



Mid-West Area Strategic Plan

SEA Statement

June 2012

Limerick City Council

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Comhshool, Pobal agus Rialtas Áitiúil
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An Roinn Iompair
Turasóireachta agus Spóirt
Department of Transport,
Tourism and Sport



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Content

Chapter	Title	Page
1.	Introduction	9
1.1	Introduction _____	9
1.2	Mid West Area Strategic Plan _____	9
1.3	Structure of the SEA Statement _____	10
2.	Consultation	11
2.1	Introduction _____	11
2.2	Statutory Consultation _____	11
2.3	Public Consultation _____	11
2.4	Submissions to Consultation _____	12
2.5	Summary of Primary Environmental Submissions _____	12
3.	Integration of Environmental Considerations into MWASP	15
3.1	Introduction _____	15
3.2	Sustainability Principles _____	15
3.3	Integration of Strategic Environmental Assessment into MWASP _____	16
3.4	Monitoring _____	16
4.	Reasons for Choosing the Plan	26
4.1	Introduction _____	26
4.2	Conclusions _____	31
Appendix A. SEA Consultation list _____		33
Appendix B. Summary of MWASP Submissions and Incorporation of Comments into Strategy _____		35



1. Introduction

1.1 Introduction

This document is the Strategic Environmental Assessment (SEA) Statement which has been prepared as part of the SEA process for the Mid West Area Strategic Plan (MWASP).

This SEA Statement has been prepared in accordance with *Schedule 2, Section 16(2) of the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations (S.I. No. 435 of 2004)* as amended. The SEA statement provides information on the following:

- How environmental considerations, consultation responses and the recommendations of the Environmental Report have been integrated into the development of the MWASP;
- The reasons for choosing the Plan, as adopted, in the light of the other reasonable alternatives dealt with; and
- The measures decided upon to monitor the significant environmental effects of implementation of MWASP;

The preparation of the SEA statement was undertaken taking full cognisance of the relevant best practice guidance below;

- *Assessment of the Effects of Certain Plans and Programmes on the Environment. Guidelines for Regional Authorities and Planning Authorities. Department of Environment, Heritage and Local Government (2004), Implementation of SEA Directive (2001/42/EC) (2004).*
- *Development of Strategic Environmental Assessment (SEA) Methodologies for Plans and Programmes in Ireland, Environmental Protection Agency (2003),*

1.2 Mid West Area Strategic Plan

The overall objective of the MWASP is to provide a framework to help guide the physical and spatial development of the Mid-West region to 2030. The plan is not intended to present an “end-state”, but instead is a framework that will guide a continuous process over the next twenty years and beyond to shape a more sustainable future for the Mid-West region.

The Mid West area comprises the entirety of Limerick City, Limerick County, County Clare and North Tipperary. The MWASP focuses primarily on the “Gateway area” of Limerick and Shannon and the “Hub”

town of Ennis as designated in the *National Spatial Strategy 2002 – 2020*, but also considers other major urban centres and rural areas in the Mid West area.

1.3 Structure of the SEA Statement

The SEA statement is structured in a logical coherent manner, in order to clearly present the required information as detailed above:

Section 2 outlines the consultation undertaken on the MWASP, and the associated documentation including draft Environmental Report as required under Article 13 of the *European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations (S.I. No. 435 of 2004)*. This section outlines how the content of the MWASP, the draft Environmental report and associated documentation was influenced by the submissions received during the consultation period.

A more detailed appraisal of the consultation process and the submissions made during the consultation period are presented in a separate document entitled *SEA Consultation – Submissions Report*.

Section 3 details how the principles of sustainable development and environmental protection were integrated into MWASP. This section also details the proposed mitigation measures that will ensure that MWASP strategies and projects that result do not have a significant environmental effect.

Section 4 presents the rationale for choosing the MWASP strategy as proposed, when compared to the “reasonable alternatives” assessed.

Section 5 presents the measures decided upon to monitor the significant environmental effects of implementation of MWASP

2. Consultation

2.1 Introduction

A comprehensive consultation process was undertaken on the Draft Environmental Report. This involved consultation with the designated environmental authorities, other statutory and non statutory authorities and the public. Full details of the consultation process are provided in the *SEA Consultation – Submissions Report*.

2.2 Statutory Consultation

Hard copies of the draft MWASP strategy report with accompanying Public Transportation Feasibility Study (PTFS), Natura Impact Statement (NIS) and the draft SEA Environmental Report were delivered to the designated environmental authorities on January 20th 2012. The environmental authorities consulted are as follows;

- Environmental Protection Agency;
- Department of the Environment, Community and Local Government;
- Department of Communications, Energy and Natural Resources;
- Department of Agriculture, Food and the Marine;
- Department of Arts, Heritage and the Gaeltacht.

In addition other statutory and non-statutory consultees were consulted on the MWASP strategy. A full list of consultees is presented *Appendix A List Of Consultees*

2.3 Public Consultation

Public consultation commenced on January 20th 2012 with the deadline for receipt of submissions in respect of the draft MWASP strategy documentation being 8th March 2012.

Notification of the SEA consultation for MWASP was advertised in the following newspapers.

- Limerick Leader;
- Irish Times;

Following this advertisement, the draft Environmental Report was made available for public inspection at the public offices of the following Local Authorities within the study area of MWASP:

- Limerick City Council;

- Limerick County Council;
- Clare County Council; and
- North Tipperary County Council.

In addition a digital version of the draft Environmental Report was also made available on the www.MWASP.ie web-site.

2.4 Submissions to Consultation

In response to the invite to consult on the content of the MWASP plan and the SEA, 23 submissions were made by those on the consultation list and by members of the general public.

Each of the submissions received have been reviewed in detail by the project team and the MWASP Steering Group and amendments have been made to the MWASP strategy documentation and the SEA Environmental Report where deemed appropriate. Full details of all submissions and integration of these into the report are contained within *Appendix B Summary of MWASP Submissions and Incorporation of Comments into Strategy*

2.5 Summary of Primary Environmental Submissions

Some submissions had a substantial amount of background research and information to support their comments. This background research and information provided with the submissions has been considered, and has been useful in terms of outlining the requirement for introducing changes to the MWASP strategies or supporting environmental measures.

Some submissions included specific recommended text edits to the MWASP strategy document, the Environmental Report or accompanying documentation. Full details of all submissions made, and of the amendments to the plan where considered appropriate are detailed in *Appendix B Summary of MWASP Submissions and Incorporation of Comments into Strategy*. A variety of submissions were made to the invite for consultation covering a broad range of topics. The submissions with greatest relevance to the SEA and to the integration of the principles of sustainability and environmental protection were made by the following bodies;

- Environmental Protection Agency;

- Department of Arts, Heritage and the Gaeltacht

In summary, the main environmental issues that were addressed in the submissions were as follows:

- There was a request for a greater focus on the protection of “non-designated” ecological sites with particular reference to preserving “ecological corridors” and ensuring that habitat fragmentation does not occur. Additional text was added to the SEA Environmental report to strengthen the recognition of the importance of non-designated ecology. In addition, it should be noted that the SEA strategic Environmental Objectives, include for the protection of non-designated valuable ecological sites, with particular reference to “ecological corridors
- There was a request for the SEA to address outstanding landscape and natural heritage. The SEA Environmental Report includes Strategic Environmental Objectives and relevant mitigation measures for the protection of the landscape and heritage in the region. .
- There was concern raised about the potential environmental impact arising from the provision of the proposed “Ennis Transshipment Centre”. Specific mitigation measures were added to the SEA Environmental Report to ensure that the development of this facility does not have a significant impact on the sensitive receiving environment of the Shannon Estuary. Effective “siting” of the facility is a key requirement to ensure that there is no significant environmental impact resulting.
- There was a requirement to ensure that the potential impact of flooding on existing and proposed transport related infrastructure (road / rail / air) should be taken into consideration in addition to the requirement for flood relief measures to be considered. There were specific SEA strategic environmental objectives and mitigation measures introduced to ensure that developments proposed under the MWASP strategy follow best practice measures in regard to flood risk. This includes taking full cognisance of the requirements and recommendations from the Shannon CFRAMS project.
- There was a recommendation that provisions should be made in MWASP for the incorporation of the objectives and measures for individual water bodies set out in the River Basin Management Plan. The SEA Environmental Report was

modified to include reference to the relevant River Basin Management Plans with specific Strategic Environmental Objectives and mitigation measures introduced.

- There was a request to include measures to control and manage alien/invasive species. In response to this submission a specific Strategic Environmental Objective was introduced which would ensure that this issue is dealt with on an ongoing basis by projects arising from the introduction of the MWASP strategies.

It should be noted that all modification to Strategic Environmental Objectives (SEOs), mitigation measures or proposed monitoring programmes have all been all fully integrated into the MWASP strategy document.

3. Integration of Environmental Considerations into MWASP

3.1 Introduction

This section of the SEA statement details how the principles of sustainable development and environmental protection were integrated into MWASP. This section also details the proposed mitigation measures that will ensure that MWASP strategies and projects that result do not have a significant environmental effect and that sufficient monitoring is in place to allow for impacts to be effectively assessed.

The development of the MWASP strategy has been based on a set of strategic policies which include protection of the environment. In addition, the development of MWASP has been undertaken in parallel to the Strategic Environmental Assessment (SEA) process. The SEA process has been undertaken to ensure that the proposed MWASP strategies that are implemented will not have a significant negative effect on the receiving environment over the lifetime of the plan.

3.2 Sustainability Principles

One of the key principles of the Mid West Area Strategic Plan is sustainability. The vision statement for the plan states the following:

“The Mid-West Region and Limerick City as its capital, will realise its potential as a gateway region both nationally and internationally.

The future of the region will be based on sustainable, economic, social equity and environmental drivers, which together will deliver an enhanced quality of life”.

The vision statement for MWASP highlights the central position of sustainable development and environmental protection in the strategy which will act to ensure an enhanced quality of life for the residents of the region. Specifically the MWASP strategy is based on the following strategic policies:

- To protect the landscape, ecologically sensitive areas and the cultural and built heritage of the region from inappropriate development that is unsustainable.
- Minimise the negative impacts of transport on the local and global environment through reducing localised air pollutants and greenhouse gas emissions
- Improve security of energy supply by reducing dependency on imported fossil fuels.

These strategic policies have been central to the development of MWASP, ensuring that environmental protection and sustainable development are key drivers to the future development of the region.

The proposed improvements in settlement patterns, infrastructural development and public transport provision will allow for sustainable development, reduction in emissions to the environment and protection of sensitive locations within the region.

3.3 Integration of Strategic Environmental Assessment into MWASP

The Strategic Environmental Assessment (SEA) determined that in general the preferred MWASP strategy has a largely positive impact on the receiving environment, with the implementation of appropriate mitigation measures and ongoing monitoring programmes.

Section 6.4.4 *Strategic Environmental Assessment* of the *MWASP Planning, Land use and Transport Strategy* document outlines that the implementation of MWASP strategies will require the implementation of **all appropriate mitigation measures and the proposed monitoring programme as outlined the SEA Environmental Report**. This will ensure that the implementation of the MWASP strategies will not result in a significant impact on the receiving environment.

The inclusion of these mitigation measures in the MWASP strategy ensures that the requirements of the Strategic Environmental Assessment are fully integrated into MWASP. These mitigation measures are included in *Table 6.8 Strategic Environmental Assessment Mitigation Measures* in the *MWASP Planning, Land use and Transport Strategy* document.

3.4 Monitoring

The SEA Directive requires that the significant environmental effects of the implementation of plans and programmes are monitored. This Section of the SEA Statement, *Section 11 Monitoring* of the Environmental Report and *Table 6.9 MWASP SEOs Indicators Targets and Monitoring* in the *MWASP Planning, Land use and Transport Strategy* document details the proposed monitoring to be undertaken as part of the implementation of the MWASP strategy.

The purpose of monitoring is to identify any unforeseen effects that may have occurred during the implementation of the preferred strategy and to take immediate remedial action, if deemed necessary.

As part of the monitoring of MWASP it is necessary that key environmental indicators be monitored in order to assess the level of achievement of key environmental objectives. Indicators have been chosen that are relatively readily available, quantifiable and that relate to the various environmental objectives. If better quality or more comprehensive information becomes available this will be used in the future.

It is considered that an *Environmental Review Report* will be prepared that will present the results of the environmental monitoring on a five yearly basis. This will ensure a quality record of the performance of MWASP in terms of the impacts on the Strategic Environmental Objectives over the lifetime of MWASP.

Objective Title and Code	Target/ Assessment Code	Detail of Objective	Indicator	Target/Assessment Criteria	Monitoring
Biodiversity, flora and fauna (O-BFF)	T-BFF-01	The Strategy alone or in combination should not significantly impact on valuable ecological habitats and species including European Designated Sites (SACs and SPAs), Nationally Designated Sites (NHA's) other designated sites (e.g. sensitive waters, bathing waters) ecological corridors or local sites	Conservation status of habitats and species as assessed every 6 years under Article 17 of the Habitats Directive and % of other valuable habitats and species due to implementation of MWASP strategies through trending of ecological surveys.	Estimated effects of development for which this plan provides a framework on protected sites.	Consultation with the National Parks, Wildlife Service, Inland Fisheries Ireland and the co-ordinating local authority for the River Basin District (where relevant) in order to identify changes in the ecological status of relevant habitats followed by quantitative analysis of relevant data..
	T-BFF-02	To ensure compliance with Article 10 of the Habitats Directive and protect ecological connectivity between Natura 2000 sites.	Loss of areas of ecological connectivity as a result of implementation of MWASP strategies	Estimated effects of development for which this plan provides a framework on essential dispersal and migration corridors/stepping stones between Natura 2000 sites.	Consultation with the National Parks, Wildlife Service, National Biodiversity data Centre, Inland Fisheries Ireland and the co-ordinating local authority for the River Basin District (where relevant) in order to identify changes in the ecological status of relevant habitats followed by quantitative analysis of relevant data..

Objective Title and Code	Target/ Assessment Code	Detail of Objective	Indicator	Target/Assessment Criteria	Monitoring
	T-BFF-03	The Strategy alone or in combination should not impact the biological diversity within the study area and to ensure that invasive species do not impact significantly on the biodiversity of the region there is no significant loss of valuable habitats and species not protected as European Designated Sites.	Measurement of the loss of valuable habitats and species on or close to development sites and the the occurrence of invasive species at these sites due to implementation of MWASP strategies through trending of annual/bi-annual surveys	To avoid having a significant impact on the integrity of regional scale biodiversity in the region.	Consultation with the National Parks, Wildlife Service, Inland Fisheries Ireland and the co-ordinating local authority for the River Basin District (where relevant) in order to identify changes in the ecological status of relevant habitats followed by quantitative analysis of relevant data. In addition consultation should be undertaken with Invasive Species Ireland (National Biodiversity Data Centre) to identify the status of invasive species.
	T-BFF-04	Aims to ensure that the strategy or proposals arising from the strategy do not result in the introduction of invasive species to the region.	Establishment of invasive species in areas where MWASP strategies have been implemented.	To avoid the establishment of invasive species in areas where MWASP strategies have been implemented and to promote the implementation of Codes of Practice where required	Consultation with the National Parks and Wildlife Service to identify the occurrence invasive species in the region followed by quantitative analysis of relevant data..

Objective Title and Code	Target/ Assessment Code	Detail of Objective	Indicator	Target/Assessment Criteria	Monitoring
Population and Human Health (including Noise) (O-PHH)	T-PHH-01	The strategy should enhance the economic and employment opportunities within the area and should implement strategies that promote social and economic inclusiveness for those suffering economic and social exclusion. In addition the Strategy should increase accessibility to quality public, cultural and community services (recreational, social and educational) in particular for those who are physically or economically deprived.	In making this assessment, consideration will be given to the potential affects to quality of life and environmental quality of the study area arising from MWASP. Emphasis will be placed on economic regeneration within the core of the strategy development.	To promote social and economic inclusiveness.	Every 5 years during the lifetime of MWASP monitor data on the unemployment levels in areas impacted by high unemployment and social deprivation, where proposed elements of the transport networks have been implemented.
	T-PHH-02	The Strategy should promote the use of safer modes of public transport.	% change in road accidents in areas where MWASP strategies were implemented.	Increasing the attractiveness of public transport through enhanced safety measures.	A review of road and traffic related accident data should be undertaken every 5 years to identify % change in road accidents in areas where MWASP strategies were introduced..
	T-PHH-03	The strategy should minimise noise and vibration effects on sensitive receptors	% change in noise levels on transport routes in proximity to	To ensure that the strategy does not result in significant population	A review, every five years of the Local Authorities noise action plans and monitoring



Objective Title and Code	Target/ Assessment Code	Detail of Objective	Indicator	Target/Assessment Criteria	Monitoring
			residential areas.	exposure to noise and vibration effects when compared with the existing situation	data to identify % change in road traffic generated noise along routes where MWASP strategies were introduced.
	T-PHH-04	The Strategy should promote healthy lifestyle choices in respect of transport mode selection.	% change in transport by walking or cycling in areas where MWASP strategies implemented.	Increase in healthy transport options utilised, such as cycling and walking	A review every 5 years of the % change in modal shift towards walking or cycling where MWASP strategies were introduced.
	T-PHH-05	The strategy should ensure that human health is protected from hazards or nuisances arising from exposure to incompatible land uses	Occurrence of spatially specific deterioration in human health arising from environmental factors as identified by Health Services Executive and the Environmental Protection Agency.	Increase in efficient public transportation and effective land use zoning ensuring separation of hazardous land uses from residential areas.	A review of local area Health Status Reports every five years for areas where MWASP strategies were implemented.
Water (O-W)	T-W-01	The Strategy alone or in combination should not impact on water quality (river, lake, transitional, coastal and groundwater) arising from the implementation of same	Change in water status of water bodies in proximity to areas where MWASP strategies implemented.	To ensure waterbodies within the area where MWASP strategies are implemented are not precluded from compliance with the Water Framework Directive due to strategies	Five year review of the Shannon International River Basin District Water Status for catchments in areas where MWASP strategies are implemented

Objective Title and Code	Target/ Assessment Code	Detail of Objective	Indicator	Target/Assessment Criteria	Monitoring
				and to ensure that the objectives and measures for waterbodies set out in the relevant River Basin Management Plan are complied with. .	
	T-W-02	The Strategy should ensure that development occurs in areas not prone to flooding in the absence of appropriate mitigation and should be undertaken to ensure no risk of future flooding.	Change in area of land developed in high risk flood areas	To ensure compliance with the Floods Directive (2007/60/EC) and the National Flood Risk Management Guidelines.	A review (every 5 years) of OPW records of flood events in areas where MWASP strategies have been implemented and of development in high risk flood zones to ensure compliance.
Air Quality and Climate (O-AQC)	T-AQC-01	The Strategy should promote the improvement (through quality or reduction) in emissions to atmosphere arising from the transport infrastructure.	Change in emissions of transport related emissions in areas where MWASP strategies implemented.	A decrease in atmospheric pollution in the region related to transport emissions.	A review (every 5 years) of Limerick City Council Air Quality monitoring data to identify changes in ambient ?air quality
	T-AQC-02	The Strategy should minimise energy consumption and thus greenhouse gas (GHG) emissions, which contributes to	Change in ghg emissions in areas where MWASP strategies	A decrease in GHG emissions in the region related to transport emissions.	A review (every 5 years) of Limerick City Council Air Quality monitoring data to identify changes in air quality

Objective Title and Code	Target/ Assessment Code	Detail of Objective	Indicator	Target/Assessment Criteria	Monitoring
		climate change.	implemented.		emissions and of EPA GHG inventories and emissions data.
Soils (O-S)	T-S-01	The Strategy should ensure the preservation of areas of Geological Heritage Importance	Change in area of Geological Heritage Areas within area where MWASP strategies are implemented.	To ensure conservation of areas of Geological Heritage Importance	The potential impact on geological heritage is project specific. A review every 5 years will be undertaken of Environmental Reports/Environmental Impact Statements issued as part of planning approval applications to monitor any potential impacts on geological heritage.
Cultural Heritage (O-CH)	T-CH-01	The Strategy must not impact on designated cultural heritage sites (e.g. National Monuments), areas of known potentially high archaeological importance, conservation areas and Protected Structures.	The potential for direct or indirect impacts on areas of Cultural Heritage Importance.	To ensure conservation of areas of Cultural Heritage Importance.	The potential impact on cultural heritage is project specific. A review (every 5 years) will be undertaken of Environmental Reports/Environmental Impact Statements issued as part of planning approval applications to monitor any potential impacts on cultural heritage.

Objective Title and Code	Target/ Assessment Code	Detail of Objective	Indicator	Target/Assessment Criteria	Monitoring
Landscape (O-L)	T-L-01	The Strategy should minimise impacts on the landscape character, and on designated, sensitive and protected landscapes. The Strategy will promote the integration of transport modes into the urban fabric rather than greenfield development	The potential for direct or indirect impacts on the landscape character, and on areas of landscape importance. Promotion of the and the use of brownfield development sites/ corridors rather than greenfield locations	To ensure conservation of landscape character areas and of designated, sensitive and protected landscapes. .	The potential impact on landscape will result from individual projects. A review (every 5 years) will be undertaken of Environmental Reports/Environmental Impact Statements issued as part of planning approval applications to monitor any potential impacts on the landscape and visual amenity.
Material Assets (O-MA)	T-MA-01	The Strategy should minimise the demand on fossil fuels, and maximise the use of existing national, regional and local assets where appropriate whilst minimise the generation of waste	% change in imported fossil fuel usage in the area where MWASP strategies were implemented. C & change in length of additional infrastructural assets (on Greenfield sites) and waste quantities generated by MWASP strategy led projects.	Maximising the use of existing infrastructural assets. Integrating access to public facilities and amenities. Minimising the use of finite natural resources and minimising the generation of waste.	A review of transport fuel consumption and C&D waste generation within the Mid-west area should be undertaken and reported on every 5 years and analysed in light of the implementation of MWASP strategies.



Objective Title and Code	Target/ Assessment Code	Detail of Objective	Indicator	Target/Assessment Criteria	Monitoring

4. Reasons for Choosing the Plan

4.1 Introduction

This section summarises the evaluation of the Alternative Scenarios which is found in *Section 8 Assessment of Alternative Strategies* of the Environmental Report. Three scenarios are evaluated in robust manner to identify the favoured scenario from an environmental perspective.

A central element of MWASP is the development of an integrated transportation strategy. A Public Transport Feasibility Study (PTFS) was undertaken to identify feasible options for the attainment of mode shift from car to more sustainable modes, primarily public transport.

Three different strategy scenarios resulted from the PTFS and these alternative options were considered in the SEA. The scenarios assessed are as follows:

- **Scenario 1** is based on the Regional Planning Guidelines and focusing population and employment in Limerick and the remaining dispersed across the region and with **no** changes to the current transport provision with the exception of some very low cost soft measures.
- **Scenario 2** is based on the Regional Planning Guidelines and focusing population and employment in Limerick and the remaining dispersed across the region and includes **significant** elements of public transportation provision over the duration of the plan.
- **Scenario 3** is based on the Regional Planning Guidelines but with a strong emphasis targeting a mode share of 55% for modes other than car; as per Smarter Travel policy for the city region and a mode share increase for the hinterland. Accordingly this scenario includes a wide range of public transport and other initiatives, both hard and soft. To achieve the significant mode shift outlined in Scenario 3, an **extensive** range of measures is proposed including major upgrading of public transport (both infrastructure and services), smarter choices initiatives and land use policies to avoid dispersed development plus investment in rural public transport. This can only be achieved with considerable investment over a longer term period.

In order to assess the alternative strategy scenarios a comparative analysis was undertaken of each of the alternative strategy scenarios in terms of the potential impact accruing from each on the Strategic

Environmental Objectives (SEOs). It was determined whether the strategy scenarios have potential to have a positive or negative impact on the SEOs. The results of the alternative strategy assessments have been presented in Table 4.1 Assessment of Alternative Strategies below;

Table 4.1 Assessment of Alternative Strategies

	Likely to Improve status of SEOs	Possible Conflict with SEOs	Neutral Impact on SEOs
Scenario 1	x	x	√
Scenario 2	√	√	x
Scenario 3	√	√	x

4.1.1 Scenario 1

This scenario entails very limited intervention in terms of providing alternative modes of transport. This scenario represents the continuation of existing dispersed development patterns which are served by limited public transport provision. This scenario entails the simplification of the existing transport networks but does not involve an increase in public transport provision. Modelling of the impact of these interventions has indicated that by 2015 this scenario would result in a 5% increase in public transport usage. This would increase the public transport share to just 6%.

In terms of the potential impacts of Scenario 1 on the Strategic Environmental Objectives (SEOs) it is considered that the strategy elements proposed will have a largely neutral impact. The potential impacts of this alternative strategy on the Strategic Environmental Objectives are summarised below:

- The impact from Scenario 1 on Biodiversity, Water Quality, Soils and Landscape SEOs is largely neutral, with a slight potential negative impact arising during the construction phase of a Limerick City Centre Bus Hub and Layover area.
- There will be a slight positive impact in terms of the impact on the Population and Human Health SEO's in terms of the benefits accruing due to the higher uptake of public transport and reduced congestion resulting from lower car usage in the Limerick area.

- There is a slight potential negative impact on cultural heritage elements in Limerick City Centre as the proposed development of a City Centre Bus Hub and improved street furniture may occur within the South City Centre Architectural Conservation Area (ACA), the South Circular Road ACA, O'Connell Avenue ACA, Johns Square ACA, Ballincurra Road ACA and the Ennis/Shelbourne Road ACA or within proximity to some of the many protected sites and structures within the city centre area.

Overall, it is considered that the strategy elements proposed under Scenario 1 will have a largely neutral impact on the SEOs, and as a result this alternative strategy option (in isolation) is not considered as the preferred option.

4.1.2 Scenario 2

Scenario 2 proposes significant intervention in terms of both “soft” measures and “hard” measures. This scenario entails the delivery of significantly improved public transport within the Limerick area and significant improvements in the provision of bus services between major towns elsewhere in the region. These improved services however require a restructuring of the regional bus services which may result in a lower degree of public transport provision in rural areas where there is not a sufficient population base to support it. In those low density areas it may be feasible to introduce demand responsive transport (DRT) services to link to main towns, for onward access on the more frequent regional bus service.

The most significant elements of infrastructural provision for the region include the provision of three new Bus Rapid Transit (BRT) Routes serving the Limerick area, a number of potential park & ride facilities (P&R) surrounding Limerick, which will promote commuters to park their cars and travel into the city centre (and beyond) on the improved bus services. In addition, a key strategy of Scenario 2 is the provision of improved cycle and walking routes.

Modelling of the impact of these interventions has indicated that by 2020 this scenario would result in a 20% increase in public transport usage. This will increase the public transport share to just 8%

In terms of the potential impacts of Scenario 2 strategy elements on the Strategic Environmental Objectives (SEOs) it is considered that the strategy elements proposed will have an overall slight positive impact. The potential impacts of this alternative strategy on the Strategic Environmental Objectives are summarised below:

- There are both slight positive and slight negative impacts on Biodiversity and Water Quality SEOs resulting from Scenario 2 elements. There will be positive impacts accruing due to the reduction in traffic congestion in Limerick which will result in lower emissions to air and reduced “road runoff” to water. However there are some potential infrastructural works that if not mitigated could result in some short term slight negative impacts on water resources and ecological habitats, particularly in the Limerick area, with particular reference to the Lower Shannon SAC. In addition a proposed park and ride facility maybe located in proximity to Loughmore Common Turlough pNHA, which has already been degraded due to lower water levels. However it is considered with appropriate site location and design (integrating Sustainable Urban Drainage Systems SUDs) there will be no significant impact on this pNHA.
- A potential park and ride facility near Milltown to the west of Limerick, may be located in the Groody River Valley and in the absence of sufficient mitigation there is a potential for a negative impact on water quality in the catchment. There is also a flood risk in this catchment which would need to be considered in terms of site location and design. However it is considered that with appropriate site location and design (Sustainable Urban Drainage Systems SUDs) there will be no significant impact arising from this facility.
- There is a slight potential negative impact on cultural heritage elements in Limerick arising from the proposed development of infrastructure such as the BRT routes and potential P&R facilities, particularly within Limerick City where parts of the city are designated as Architectural Conservation Areas. However it is considered with appropriate site location of infrastructure and strict adherence to the principles of the Architectural Heritage Protection Guidelines for Planning Authorities, DEHLG 2004 will mitigate any significant impacts.
- There is considered to be significant positive impacts accruing from Scenario 2 in terms of the Population and Human Health SEOs. A significant reduction in traffic congestion, with resultant positive effects in terms of reduced noise levels and air quality will have a significant positive impact on the human population. In addition the provision of improved public transport will allow the population, particularly those from marginalised areas of Limerick greater access to employment opportunities and community and cultural facilities.

- The reduction in traffic congestion will result in a significant improvement in air quality, which will have a significant positive impact on the Air Quality SEO, including a reduction in air emissions and greenhouse gas emissions.

Overall, it is considered that the strategy elements proposed under Scenario 2 have an overall slight positive impact on the SEOs. There are some potential conflicts with the SEOs, however it is considered with appropriate mitigation there will be no significant impact resulting. As a result this alternative strategy option (in isolation) is considered as a favourable option.

4.1.3 Scenario 3

Scenario 3 builds on the provision of quality and restructured public transport proposed under Scenario 2. This scenario entails strategy options that include further “soft” measures such as the development of travel plans for schools and workplaces. The main focus of Scenario 3 is to offer significantly greater frequency on bus routes proposed under scenario 2 with some additional services such as a Limerick orbital route. This option also entails the expansion of the cycle and walking network within Limerick as well as a further enhancement of the regional bus services. An additional element includes the development of freight handling services within the region.

In terms of the potential impacts of Scenario 3 strategy elements on the Strategic Environmental Objectives (SEOs) it is considered that the strategy elements proposed will have an overall significant positive impact. Details of the potential impacts of this alternative strategy on the Strategic Environmental Objectives are summarised below:

- There are both slight positive and slight negative impacts on Biodiversity and Water Quality SEOs resulting from Scenario 3 elements. There will be positive impacts accruing due to the further reduction in traffic congestion in Limerick which will result in lower emissions to air and reduced “road runoff” to water. However there are some potential infrastructural works associated with increased bus service provision that if not mitigated could result in some short term slight negative impacts on water resources and ecological habitats, particularly in the Limerick area, with particular reference to the Lower Shannon SAC. However it is considered with appropriate site location, the implementation of a Construction Environmental Management Plan (CEMP) during the construction phase and the implementation of best practice design criteria, i.e.

Sustainable Urban Drainage Systems (SUDs) there will be no significant impact on designated sites or water resources.

- A proposed Freight Transshipment Centre at an unknown location along the Shannon Estuary has potential to negatively impact on the Biodiversity and Water Quality SEOs. However it is considered with appropriate site location and design there will be no significant impact. The location of this facility will be required to take account of the outcomes of the outcomes of the Strategic Environmental Framework for the Shannon Estuary. In addition the development of a freight transshipment centre along the Shannon Estuary is likely to require a full Environmental Impact Assessment and Habitats Directive Assessment to ensure that the development does not have a significant impact on the receiving environment.
- There is considered to be significant positive impacts accruing from Scenario 3, which will build on those for Scenario 2 in terms of the Population and Human Health SEOs. A further significant reduction in traffic congestion, with resultant positive effects in terms of reduced noise levels and air quality will have a significant positive impact on the human population. In addition the provision of increased frequency in terms of the bus service will allow the population, particularly those from marginalised areas of Limerick greater access to employment opportunities and community and cultural facilities.
- The reduction in traffic congestion will result in a significant improvement in air quality, which will have a significant positive impact on the Air Quality SEO, including reduction air emissions and greenhouse gas emissions.
- The provision of significant additional cycleway and walkway routes with pedestrian prioritisation will enhance the population and Human Health SEOs.

4.2 Conclusions

Overall, it is considered that the strategy elements proposed under Scenario 3 have an overall positive impact on the SEOs. The further enhancement of the transportation network, an increase in frequency of bus services and the prioritisation of cycle and pedestrian routes would build on the infrastructural investment proposed under Scenario 2 would mean that this Scenario in combination with Scenario 2 is the preferred option. In addition the provision of higher quality, more

frequent public transport will allow for more sustainable urban development whereby residential, commercial and industrial development is focussed within the existing urban fabric, rather than more dispersed development which would result in increased potential impacts on the receiving environment in areas not previously impacted See *Appendix D SEA Analysis* of SEA Environmental Report for details of the assessment of Scenario1, Scenario 2 and Scenario 3. where strategies proposed under each scenario were assessed with reference to the strategic environmental objectives (SEOs).

Appendix A. SEA Consultation list

Consultee Name
Limerick City Council
Limerick County Council
Clare County Council
North Tipperary County Council
Mid West Regional Authority
Department of Arts, Heritage and the Gaeltacht
Department of the Environment, Community and Local Government
Environmental Protection Agency
Department of Agriculture, Fisheries and Food
Department of Communications, Energy and Natural Resources
Department of the Environment, Community and Local Government
Department of Transport, Tourism & Sport
Department of Transport, Tourism & Sport
An Taisce
Atlantic Way
Bus Éireann
Construction Industry Federation
Department of Transport, Tourism & Sport
Department of Transport, Tourism & Sport
Enterprise Ireland
Forfas
Health Service Executive
Heritage Council
IBEC
IDA
Irish Concrete Federation
Irish Farmers Association
Irish Rail
Irish Rural Dwellers Association
ISME
JJ Kavanagh
Limerick and Clare Energy Agency
Limerick Regeneration
National Parks and Wildlife
National Roads Authority
National Transport Authority
Shannon Airport
Shannon Development
Shannon Foynes Port Authority

Consultee Name
Tipperary Energy Agency
Waterways Ireland
Nenagh Chamber of Commerce
Roscrea Chamber of Commerce
Thurles Chamber of Commerce
Shannon and District Chamber of Commerce
Ennis Chamber
Limerick Chamber
Office of Public Works

Appendix B. Summary of MWASP Submissions and Incorporation of Comments into Strategy

No.	Name	Organisation	Ref.	Consultation Response	Incorporation into MWASP
1	Warren Whitney	N/A	1.1	Orbital route and Ennis Transshipment centre are referred to but not identified in the text	Refer to section 3.11.2 And 3.12 of PTFS.
			1.2	Subvention levels of PT should be provided	This is a strategic document and does not address operational expenditure. This would require a fuller assessment and is not generally address in this type of report.
			1.3	Commitment to more frequent Ennis rail service to build on success should be identified	Comment added in section 3.3; however, general review of this service expansion indicated that this may not be financially viable.
			1.4	Unsure of appropriateness of high speed rail in study	It is a long-term strategic plan and high speed rail line connections should at least be assessed, as noted in the plan.
			1.5	No priority levels for road improvements	Information on this was not available at the time and was not available from the agency that has responsibility for prioritisation.
			1.6	No planned provision for PT in Ennis which could be added to service 310 in some form.	Comment added in section 4.3.2, although extended local service in Ennis is unlikely..
			1.7	Costs of BRT seem low and speeds high in comparison to Dublin and Cork BRT	Costs of BRT depend on engineering assessment but could be priority lanes rather than additional alignment, which would reduce costs. High speeds were required to attract users, partially reflecting the better quality perception – text has been added to sections 3.5 and 4.2.2.
2	Tara Spain	National Roads Authority	2.1	Wants to be briefed in full considering limited consultation	Consultation held with the NRA was deemed appropriately sufficient to inform the study and was no less than meetings held with other bodies of similar stature.
			2.2	Provides updates on a number of schemes including the suspension of the Atlantic Corridor, N21, N24 Pallasgreen to Cahir, N62 Thurles Bypass and N62 Roscrea Bypass. The Ballysimon interchange to be	Comments are noted and minor edits to text in Section 5.4.4 Strategic Road Infrastructure have been made.

No.	Name	Organisation	Ref.	Consultation Response	Incorporation into MWASP
				enhanced.	
			2.3	Project team to be aware that new River Shannon crossings are subject to tolling schemes	The comments are noted and the strategic plan is not materially affected by this level of detail. The transport model is also unaffected by the information provided as it is a model to support the decision making of the public transport requirement to a large degree. No changes to the report required.
			2.4	Road proposals should indicate whether they have been completed, particularly in relation to items 2,3,4,7	These road projects have been only proposed by the NRA and the text does not suggest that they are completed. Thus the text has not been amended
			2.5	Modelling detailed in Section 5.4.3 and Appendix C does not tie into Section 6.2	Have reviewed for consistency and made changes where necessary.
			2.6	New road schemes in DS2 Low Cost not listed, NRA wants to check validity.	Have added a table with modelled improvements as Appendix C to the PTFS
			2.7	PnR sites have not been evaluated in detail and must be done so in a coordinated way	PnR sites have been evaluated in the context of a strategic plan following in-depth local consultation with local authorities.
3	Bryan Wylie	Irish Rail	3.1	No Issues with the strategy though highlighted the new morning Limerick-Dublin service to serve MWASP rail stations.	Changes made to report in section 2.3.6 Access and transport infrastructure issues
4	Patrick O'Sullivan	Dept. Environment Community & Local Government	4.1	Strategy should be updated with 2011 census data and population figures	Table 5.1 of the Report has been amended with 2011 population levels and consequent changes to targets in future growth periods. The final targets remain unchanged.
5	Tara Buckley	RG Data	5.1	Supports sustainable retail development in vibrant towns and villages.	Most of the issues raised are more properly dealt with in Retail Strategies and County Development Plans. The identification of a settlement hierarchy in MWASP will establish a framework for



No.	Name	Organisation	Ref.	Consultation Response	Incorporation into MWASP
					development from which the RGDATA concerns can be met. Retail has been removed from the key employment sectors. The Shannon Development comments are supported. In reality if Limerick does get a boost in retail jobs they are likely to be displaced from other areas in the Region i.e 'the Dundrum effect.' Not seen as a huge growth area.
			5.2	Recommends a comprehensive database be established in the region that there is a fair and equitable distribution of retail.	See comments above and note that this database would be included in the regional retail strategy.
			5.3	A region specific reference should be made to zoning.	The strategic plan does not assess zoning.
			5.4	Mixed use retail warehousing.	A more appropriate evaluation should be under separate reports on retail.
			5.5	Wants parking supply to be managed	Was addressed in the modelling scenarios and current model has restrictions on parking and movement in city centre. No additional changes proposed.
6	Rita McInerney	Ennis Chamber	6.1	Wants a connection between Quin Road and Eastern Bypass, signage for Ennis on the motorway and development of relief roads	Issues best addressed in County Development Plan settlement hierarchy. The framework established in MWASP will help create the critical mass needed to most of the issues to be addressed. No change.
			6.2	Job creation should be emphasised.	Under 3.5.3 Key Growth Sectors for the Region, the key sectors for job creation have been highlighted. Under 5.3.2: Key Strategic Recommendations for the Region job creation is now referred to several times.
			6.3	Identify the potential of natural assets for same.	Included under 3.5.3 Key Growth Sectors for the Region Energy and Environmental sector - the Region's natural assets

No.	Name	Organisation	Ref.	Consultation Response	Incorporation into MWASP
					of wind and wave have already been referenced Tourism –: The following text has been added: <i>"The Shannon Estuary is one of the Regions most important natural assets. There is an opportunity to further utilise the Shannon to help attract more tourists to the Region and subsequently help create jobs"</i> .
			6.4	Development of Shannon Airport, Shannon Estuary and North Shore.	Under 5.3.2: Key Strategic Recommendations for the Region. A statement regarding the investment and improvement to national and international access to Shannon Airport has been amended for point 5. To further support the development of Shannon Airport and Shannon Estuary Ports, a reference to the need for relevant zoning around the airport is identified. The Shannon Estuary is referenced throughout the document and more references to it have been cited. Reference to the maritime sector and importance of the ports as per the Mid West Task Force Report & Mid West Regional Planning Guidelines 20120 -2022 has been included
			6.5	More retail provision in Clare and Ennis to be university campus.	Both points are beyond the scope of this report.
			6.6	Wants MWASP to consider Clare's Renewable (wind & hydro) Electricity Generation and Storage potential.	Energy is not part of the remit of this brief. No changes proposed.
7	Mary Hughes	Shannon Foynes Port co (HRA Planning)	7.1	See Conclusions of document and last 2 pages for proposed amendments	



No.	Name	Organisation	Ref.	Consultation Response	Incorporation into MWASP
			7.2	SFPC are currently preparing a masterplan for the provision of port infrastructure and services for the Shannon Estuary which will recommend the development of deep water berthage greater than the current 10.5 metre in Foynes. SFPC suggest that the deep water berth should be considered in MWASP	If pertinent information is available, it can be incorporated into the MWASP. This information was not available at time of developing MWASP.
			7.3	Wants further recognition and emphasis of development/growth of ports and needs to identify that the infrastructure serving the ports is a serious threat.	Included Shannon Estuary and its ports as key strength under 2.1 The Mid West Today. Referred to the ports in the SWOT under opportunities and threats. Under 5.3.2: Key Strategic Recommendations for the Region – 5. To invest and improve national and international access to Shannon Airport has changed to point 5. To support the further development of Shannon Airport and Shannon Estuary Ports. The importance of the port as an economic driver has been referenced Referenced maritime sector as future driver under 3.5.3 Key Growth Sectors for the Region.
			7.4	Ports do not appear to have the same priority for access and development as Shannon Airport	As above,
			7.5	Upgrades to rail and road corridor are recommended in the report but are not as key strategic recommendations	Refer to 7.4.3 Transport. No changes.
			7.6	Plan needs to prioritise link from Foynes to 200 acre Shannon Dev Site at Askeaton	The plan references the Strategic Integrated Framework Plan for the Shannon Estuary (SIFP) which will identify the available development lands. In the absence of this information the identification of upgrading the N69 and protection of the rail corridor is as conclusive as the strategic plan can be at this time.



No.	Name	Organisation	Ref.	Consultation Response	Incorporation into MWASP
			7.7	Recognition for deep water berthage at Foynes	Have included in SWOT analysis and under 5.3.2: To support the further development of Shannon Airport and Shannon Estuary Ports.
			7.8	SWOT Analysis for Ports to be updated	SWOT analysis has been updated.
			7.9	The contribution of ports to economic development should be highlighted.	Have referenced economic contribution under 5.3.2: To support the further development of Shannon Airport and Shannon Estuary Ports
8	Walter Carpenter	The Chartered Institute of Logistics and Transport	8.1	The proposed population targets are welcomed. How are targets to be achieved. 2011 Census data to be used.	The MWASP settlement strategy seems to establish a hierarchy which in tandem with the RPG's will create a framework for the core strategies of Development Plans. In this way development policies, land and use zonings will articulate the regional settlement strategy. Census 2011 data used and results updated.
			8.2	Have the identified development clusters the capacity to absorb the proposed growth.	The development clusters proposed do have enough capacity to accommodate proposed development. It is recommended the detail and spatial interaction of land uses is refined in more detail in more detailed LAP's.
			8.3	There should be robust monitoring of targets.	The strategic report outlines the monitoring requirements. No changes.
			8.4	The document should strengthen the interaction between land use and transportation.	The document has provided much information on the interaction between land use and transport. No changes

No.	Name	Organisation	Ref.	Consultation Response	Incorporation into MWASP
			8.5	Recommends the prescription of urban mobility plans.	Report notes the requirement for travel plans for work and a scheme for schools along the same principles. The city has already developed a walking and cycling strategy. When all combined they form an urban mobility plan. No changes.
			8.6	Statistics should be as up to date as possible.	Table 5.1 and population figures throughout the document have been altered to reflect 2011 census information.
			8.7	Detailed comments for changes are identified on pages 47 of submission. General comments are as below	
			8.8	Would like to include census 2011 data and potentially revise finding	Table 5.1 and population figures throughout the document have been altered to reflect 2011 census information.
			8.9	Arrangements should be put in place to monitor growth	The strategic report outlines the monitoring requirements. No changes.
			8.11	More strongly emphasise that previous dispersed settlement strategy is not appropriate	The report clearly outlines the previous issues with dispersed settlement in adequate detail. No changes.
			8.12	Land use and transportation strategy needs to be more closely integrated	The cost of more integration and trying to achieve greater mode-share for sustainable modes is uneconomic for the whole region at this stage. Will review the integration as the report stands and look to closer align both.
			8.13	Section 5.4 should clearly set out PT and sustainable strategy and not recount PTFS	Comment and referenced text reviewed but are not considered a problem
			8.14	No prioritisation of road infrastructure has been made. This could lead to proposals being dismissed	Responsibility of NRA.
			8.15	With scarce funding, protection of existing transport system to be prioritised, replacing bus/rail fleets	This cannot be addressed in the strategy, which is looking for considerable growth in usage.

No.	Name	Organisation	Ref.	Consultation Response	Incorporation into MWASP
			8.16	Exec Summary too short and doesn't convey substance of strategy	Executive Summary expanded to further highlight substance of strategy.
			8.17	Data in Chapter 2 out of date	Data updated with Census 2011 information.
			8.18	Discussion of Limerick-Ballybrophy line inconsistent between Chapter 2/7 and Appendix C. Text should be reviewed in light of March 5th service changes.	This service change has been considered but cannot be taken account of because service changes occurred post submission of the report
			8.19	Financial feasibility of high speed rail between Dublin-Limerick should be reviewed. Journey time reductions could be possible through improvements to service to Limerick Junction and timetable integration	Noted and requires independent study to look at detail of both.
			8.20	Section 3.1.2 on NDP is out of date and should reference National Recovery Plan and Comprehensive Expenditure review	Included a paragraph on The National Recovery Plan and Infrastructure and Capital Investment 2012 – 2106.
			8.21	Explicit recommendations for Local Authority Dev Plans should be made to achieve settlement objectives	The recommendations and figures in the report have been deemed to be explicit enough. No changes.
			8.22	A number of specific text edits for chapters 5, 6 and Appendix A/B	Noted
			8.23	Appendix C should expand the Exec summary and should incorporate more Irish information.	Appendix C Executive Summary has been expanded.
			8.24	Specific recommendations to BRT particularly in light of Institute's new policy statement.	References to this policy statement could not be found on the CILT Ireland website so have not been able to refer to it.
			8.25	Proposals could use some revision and forecast passenger numbers.	Comment is slightly unclear and may need some clarification. Forecast numbers are available via the model outputs but it is not intended to publish these as part of the report.

No.	Name	Organisation	Ref.	Consultation Response	Incorporation into MWASP
9	Tanya Murray	Dublin Airport Authority	9.1	Draft MWASP should provide for the CHP/Waste to Energy facility for consistency to LAP.	A site is zoned at Stonehall, north of Shannon Aerospace, for the development of a large scale green / renewable energy development. The site is not zoned specifically for CHP but is mentioned as a potential type of activity appropriate at the site (ref pg. 87 of the LAP). Any future development of the zoned lands will require site specific constraints and impact assessments. MWASP could be updated to acknowledge the zoning of these lands however detailed assessment of potential environmental pressures is not feasible given that specific development activities within the zoned lands are not known.
			9.2	MWASP should reference Shannon Integrated Framework	A description of SIFF is included in Section 3.1.8 and later in the document under key recommendations.
			9.3	Should acknowledge critical requirements for environmental framework	Our Strategy fully acknowledges the critical requirements of the key environmental frameworks within which they sit.
10	John Dawson, Trish FordeBrennan & Gerry Siney	Limerick Cycling, Limerick Earth Day & Shannon Protection Alliance	10.1	Recommended addition to the vision statement;	The vision is a strongly informed statement and will remain as stated. No changes.
			10.2	Changes to section 4.3 proposed	No changes.
			10.3	Climate change and over extraction impacting on viable water supplies to support future growth. Over abstraction from increasing population/economic growth leading to reduction in flow in the rivers which will affect flora and fauna.	SEA/AA already does this but for clarity and to demonstrate how the submissions have influenced the process. SEA/AA will be updated to reflect the need for the consideration of sustainable water usage for any future development in the region.

No.	Name	Organisation	Ref.	Consultation Response	Incorporation into MWASP
11	David Hogan	Shannon Development	11.1	This has been addressed submission has been addressed in detail in Section Error! Reference source not found.	
12	Annette O'Regan	Ballyhoura Development	12.1	The focus on Limerick City and environs will be to the detriment of Co. Limerick. A balanced growth throughout the region will be better achieved if all areas are developed. Greater support for rural areas is needed with tourism and other development supported. Support given to the objective that peripheral areas develop their own key service centres. The rural hinterland needs to be further defined with revitalisation of market towns	The role of the rural hinterland is important and not undermined by the strategy. A distinction is made between certain types of development and the indigenous and rurally based to be promoted. "Balanced" growth it to be relative to the relativity of the settlement hierarchy. Development in peripheral areas is not excluded but should be relative to the role the area is to play in the regional development. It is accepted that the various settlements and nodes identified in the strategy do not geographically spread over all parts of the region. Some areas are therefore more removed from centres than others.
			12.2	Croom, Bruff, Cappamore act as service centres for their hinterlands.	East Limerick will be served by Kilmallock as a main node. Croom is identified in the settlement hierarchy as a major town and is placed within the Atlantic Corridor.
13	Eddie Punch	Irish Cattle & Sheep Farmers' Association (Limerick Branch)	13.1	Are predominantly concerned with realigning the M21 bypass schemes for Adare/Rathkeale/Newcastlewest to the north such that better access is provided to Foynes Port via a new link road between the M21 and N69	Noted and is identified in draft report as requiring review.
14	Yvonne Nolan	Dept. Arts Heritage and the Gaeltacht	14.1	Comments in numbers 14.2 through 14.8 are in reference to the Appropriate Assessment	
			14.2	Coastal qualifying features of the Shannon cSAC are absent from the AA.	The AA focuses on terrestrial and inland surface water qualifying features as this is where MWASP strategies have potential to impact. However on review, certain options, while not directed towards coastal locations, may potentially have knock on effects



No.	Name	Organisation	Ref.	Consultation Response	Incorporation into MWASP
					for coastal qualifying features and therefore AA has been updated to consider coastal and estuarine habitats.
			14.3	Shannon Airport Coastal lagoon is at unfavourable status-influenced by drainage at Shannon Airport needs to be taken into account in AA.	The location of the coastal lagoon has been referenced in the AA.
			14.4	Dept. lists plans for consideration in combination with MWASP.	Plans listed in submission for "in combination" effects are at a much more local level than MWASP and it is therefore the case that these plans will have regard to MWASP, due to the fact that MWASP will inform future strategy development at a regional scale.
			14.5	Habitat loss and fragmentation impacts on otter and bats to be considered.	The reference to habitat fragmentation has been strengthened in the AA, and identifies the potential impact of cycle/walking route/smarter travel development with the potential to remove connecting corridors. More emphasis has been placed on the potential impact in relation to otter and bats. Note however that exact locations of walkways etc are unknown and specific fragmentation impacts cannot therefore be quantified.
			14.6	Impacts on Cloon River Freshwater pearl mussel designated area to be considered.	The AA has been updated to consider the potential impacts of the MWASP, and particularly improved transportation between Ennis and Kilrush, on the FPM Cloon catchment and Doonbeg River.
			14.7	Ecological constraints studies for P&R locations and cycle/walk ways.	P&R site locations are indicative sites only. Full site selection and constraints studies would be necessary in advance of development.
			14.8	Flood relief measures to be included	Flood relief measures are the remit of the CFRAM. Any specific development proposed to reflect MWASP will consider flooding and the measures proposed under the Shannon CFRAMs project.

No.	Name	Organisation	Ref.	Consultation Response	Incorporation into MWASP
			14.9	Comments in numbers 14.10 through 14.14 are in reference to the Strategic Environmental Assessment	
			14.10	Other features of ecological and biodiversity significance other than designated sites to be addressed	Additional text was added to strengthen the recognition of the importance of non-designated ecology. In addition, it should be noted that the SEA strategic Environmental Objectives, include for the protection of non-designated valuable ecological sites, with particular reference to “ecological corridors”
			14.11	Table 6.1 and Section 7.2.2 to be updated with ecological rational for decisions made	Ecological rational for decision making outlined in Table 6.1 and Section 7.2.2 has been strengthened. .
			14.12	CORINE is not an appropriate dataset for measuring loss of habitat connectivity	Other available relevant datasets other than CORINE has been included e.g. Biodiversity Data Centre maps, NPWS studies e.g. coastal wetland mapping etc.
			14.13	SEA needs to address outstanding landscape, natural heritage and tourism value	SEA include Strategic Environmental Objectives and relevant mitigation measures for the protection of the landscape and heritage in the region. .
			14.14	Specific recommendations for the amendment of SEA text are made.	All alterations to text as proposed by the Department of Arts Heritage and Gaeltacht have been incorporated into the final SEA ER
15	Jim Hughes	Zinc Properties Ltd	15.1	Further strengthen the strategic policy regarding Burlington as a strategic development cluster	The statements regarding Burlington have been discussed agreed with the Steering Committee who deems it appropriate for this level of study. No changes.
			15.2	To include a strategic objective that identifies potential of wind to energy and that supports a specific proposal at Gillogue.	Site specific proposals are not identified in MWASP. The former Burlington factory already identified in the Clare County Development Plan. Benefits of energy projects for employment are highlighted in employment section.

No.	Name	Organisation	Ref.	Consultation Response	Incorporation into MWASP
					The SIFP can be referenced but as this is not due to be published until late in 2012 it is difficult to go into any detail on its proposals and how they might impact on MWASP.
			15.3	Looking for discussion and support for waste to energy, sustainable recycling and Eco Business Park and the former Burlington Facility and to promote in particular waste to energy of ELVs.	While not specifically listing recovery of ELVs for energy, MWASP recognises the opportunities for the Region in the development of energy related activities.
16	Patricia Fogarty	MidWest Regional Authority	16.1	MWASP should make reference to SIFP, Regional Housing Strategy and Retail Strategy, Limerick Regeneration Plan and the Mid West Reports, and 2011 Census data.	The population and economic data have been updated post its publication of 2011 census information. Most documents are already referred to, however, a description of SIFP is included in Section 3.1.8 and later in the document under key recommendations.
17	Liam O'Mahony	Great Southern Trail	17.1	Wants a Limerick-Tralee/Killarney bus service that parallels Great Southern Trail	Limerick-Tralee/Killarney bus service text added in section 4.3.3
			17.2	Wants a Abbeyfeale-Foynes Athea service and Foynes-Charleville service	Abbeyfeale-Foynes not added specifically but reference made in section 4.3.3 to problems related to making such services viable.
			17.3	Wants walking line Curraghchase-Adare to be activated	As 17.2.
18	Tadhg O'Mahony	Environmental Protection Agency	18.1	Projected population targets to be reviewed in line with next revision of RPGs	It is intended that MWASP is monitored and reviewed at regular intervals and that a review of the RPG's would require same.
			18.2	The plan should promote development/implementation of traffic management measures to reduce congestion for the existing and proposed new urban areas.	This is primary objective of the plan and public transport increases by a multiple of four from the investment.

No.	Name	Organisation	Ref.	Consultation Response	Incorporation into MWASP
			18.3	Short, medium and long-term traffic management measures should be addressed	This comment has been reviewed ,but consider the text clear
			18.4	Wants plan implemented within each authority in a coordinated manner	The overall plan will be monitored by the Mid-West regional Authority, who is made up of representatives of each local authority.
			18.5	S3FR, the pilot freight transshipment centre for Ennis should take account of Ennis Town Development Plan and corresponding SEA, AA and FRA with potential for doing EIA, AA and flood risk assessment where relevant	Noted and specific mitigation measures relating to this facility are included in the SEA ER.
			18.6	in PTFS where heavy rail improvements are proposed, the requirements of EIA and Habitats Directives should be taken into account	Noted and it is accepted that all development proposed under the SEA strategy will require a full environmental assessment, with EIA required when there is a risk of a significant environmental impact and AA to be undertaken where there is potential to impact the integrity of a Natura 2000 site. .
			18.7	Habitat fragmentation should be considered. The protection of significant ecological corridors and linkages should be promoted within the Plan.	There are specific SEA strategic environmental objectives detailed within the SEA ER to address this issue. The importance of "ecological corridors" has been further detailed within the text of the text of the SEA .
			18.8	The potential impact of flooding on existing and proposed transport related infrastructure (road / rail / air) should be taken into consideration.	There are specific SEA strategic environmental objectives and mitigation measures to ensure that developments proposed under the MWASP strategy follow best practice measures in regard to flood risk. This includes taking full cognisance of the requirements and recommendations from the Shannon CFRAMS project.
			18.9	Provisions should be made in MWASP for the incorporation of the objectives and measures for individual water bodies set out in the River Basin Management Plan	Comment acknowledged and the SEA ER modified to ensure compliance of all developments proposed under the MWASP strategies with the River Basin Management Plans. .

No.	Name	Organisation	Ref.	Consultation Response	Incorporation into MWASP
			18.10	European Communities (Birds and Natural Habitats) Regulations 2011, (S.I. No. 477 of 2011) to be incorporated	Comment acknowledged and text was modified to reference the regulations and their requirements.
			18.11	The provision of buffer zones between designated and undesignated ecology and areas zoned for development should be promoted and the protection of corridors.	The text in the SEA ER was strengthened to highlight the importance of "ecological corridors" and buffer zones"
			18.12	EU guidance on green infrastructure which should be integrated into MWASP	The national policies on green infrastructure and achievement of more sustainable mode usage have been included in the strategy.
			18.13	Promote the implementation of measures to control and manage alien/invasive species.	The final SEA ER has been modified to reflect the importance of controlling and managing alien invasive species. In addition a strategic environmental objective has been added to ensure that this issue is dealt with on an ongoing basis by projects arising from the introduction of the MWASP strategies.
			18.14	Specific comments on SEA are provided.	All requested amendments to text have been included in documentation.
19	Bernadette Rabitte	Atlantic Force Hydro Ltd	19.1	Want consideration of renewable energy storage to be more strongly considered in Final Strategy	It is considered that consideration of "renewable energy storage" is outside the scope of this transportation and land use plan. As a result No amendments have been made to the document.
20	Joseph Murphy Builders	Joseph Murphy Builders	20.1	Want MWASP to refer to area around Newport Interchange as a suitable location for PnR as it fits the criteria set out in MWASP for a PnR	The specification of precise locations for P&R facilities are outside the scope of this document. A robust site selection process will be used to identify suitable locations for the proposed P&R facilities at the appropriate time.
			20.2	There appears to be some discrepancies between the findings in the PTFS and MWASP strategy document and that a PnR site at Newport interchange would be more appropriate than Ballysimon	The PnR sites remain as stated in the report. No changes.

No.	Name	Organisation	Ref.	Consultation Response	Incorporation into MWASP
21	David Clements	National Transport Authority	21.1	Maintaining the settlement strategy regardless of growth is counter to LUT planning	Comments noted. Refer to Mid-West RPG's as this is the basis of the settlement strategy.
			21.2	Disproportionate amount of road infrastructure to be built in comparison to soft mode infrastructure	Noted, but given the rural nature soft modes are not applicable for most areas.
			21.3	Draft strategies do not align with 55%soft mode split in Smarter Travel	Comment added in section 3.11. The objective is to achieve the target in limerick City in the shorter term and work towards achieving it in other urban areas over the longer term. This is dependent on available funding. No changes.
			21.4	Free bus based intervention services are not likely to be funded and no funding basis for doubling frequencies has been provided	Comment added in section 4.4.3. It is agreed that free bus services are unlikely but this level of fare reduction was necessary for the model to give a measurable response..
			21.5	Measures included to develop BRT are not clear	Additional text on BRT measures has been provided in sections 3.5 and 4.2.2 although the strategy is indicative, not detailed.
			21.6	Want clarification on "statutory of workplace travel plans	Workplace travel plans need to be statutory to be effective.
			21.7	Want statutory school travel plans to be replaced by programme that facilitates and assists Green Schools travel module	Reference to Green Schools travel module added to table in Appendix A, scenario 3 and 'statutory' school travel plans removed.
			21.8	Developing a midwest national car-sharing website is duplication of the existing national car sharing web site	Text adjusted in section 4.4.2 to take account of national car share web site.
			21.9	Intervention measures could be clearer	It is thought that the measures are clear given the strategic role of the PTFS.

No.	Name	Organisation	Ref.	Consultation Response	Incorporation into MWASP
			21.10	National Cycle Manual needs to be consulted for any cycle proposals, particularly S3WC1/2	Additional references to National Cycle Manual added in section 4.4.3.
			21.11	S3WC9 is too expensive relative to other investment in the area. Doesn't think Limerick transportation unit is necessary	Cycle greenways remain included as high cost elements. The Limerick Transportation unit has been removed from the implementation plan as this is expected to be addressed within the amalgamation of Limerick City and Limerick County Councils
			21.12	Service modifications to rail and implementation of RTPI in Limerick City should be updated in the text	Service modifications noted but postdate report.
22	Sarah Newell	Limerick Regeneration	22.1	No references to the Masterplan and Implementation Strategies in MWASP	Comments noted and report can be updated to address this issue in Pages 40 and 76.
			22.2	Key provisions of Moyross Implementation strategy not included.	References to regeneration policies have been added to the document as above. The detailed reference is not considered appropriate to a regional strategy.
			22.4	Permeability should be reinforced in Section 5.4.1	No changes as considered too fine a detail at this stage.
			22.5	Upgrades of Childers Road and Roxboro Road to be reinforced throughout the document and in Section 5.4.4.1	Considered adequate comments in the report on these items. No changes.
			22.6	Section 5.4.41 does not identify the Rosbrien Road Interchange/Southill as a key gateway to Limerick City and the document should identify new strategic access from M7/M20	Considered adequate comments in the report on these items. No changes.
			22.7	Better connectivity and permeability in/to Ballinacurra Weston and in/to St Mary's should be identified in the MWASP in line with the implementation strategies at each location	For a strategic study as this, and allowing for the coarseness of the model in this area, we believe this is not relevant. Services shown to pass Ballinacurra on core corridor.

No.	Name	Organisation	Ref.	Consultation Response	Incorporation into MWASP
			22.8	The MWASP should make specific reference to the vision of the Regeneration and Implementation Plans for Limerick City. The submissions makes reference to the importance of strategies already detailed in documents like the RPG's, City Development Plan, Retail Strategy for Mid West Region, Housing Strategy.	As with the Mid West Authority submission, a short summary of main recommendations of the various documents is already included in Section 3.1. The population targets of the Strategy and the RPG's for Limerick City will only be met if the policies necessary for social and economic development are implemented. The Limerick Regeneration Masterplan and Implementation Plans and the Housing Strategy for Clare County, Limerick City and County 2010 are considered central to achieving population growth in the city area. The regeneration of the City will bring about a range of economic, environmental, land use and transportation benefits which the strategy recognises as critical to the future vibrancy of the Limerick Metropolitan Area and the Region. Changes made to pages 40 and 76 are considered adequate.
			22.9	The regeneration programme for the city is already referenced in the MWASP on Page 31.	
23	Sinead Clancy	IFA Limerick	23.1	Want MWASP to recognise importance of agriculture for jobs in the area and want to be involved in ongoing consultation	Under 3.5.2 Key Growth Sectors for the Region, under Food, the 2020 Food Sector Report targets for 2020 and the importance of farmers in reaching these targets has been referenced.

