

An
Coimisiún
Pleanála

Internal Technical

Note

R318314_TN

To Jimmy Green

From Paula Kearney BSc, CEcol, MCIEEM

Development 500 seat outdoor community amphitheatre.
Former Council Depot at Commons North Lime
Quarry, Lanesborough, Co. Longford.

Topic **Ecology Technical Report.:** Adequateness of
scientific information for Biodiversity/Appropriate
Assessment

Date 19th January 2026

1.0 Introduction

- 1.1. This technical note has been prepared to assist the Senior Planning Inspector and the Commission in the consideration of impacts on Lough Ree Special Protection Areas (SPA) and Lough Ree Special Area of Conservation (SAC) with particular focus on the Special Conservation Interests (SCIs) of the SPA and Qualifying Interests (QI) of the SAC and other ecological concerns regarding bats, breeding birds and habitat loss.
- 1.2. In my capacity as Inspectorate Ecologist, I have the relevant expertise to provide a professional opinion as to the adequacy of the information before the Inspector and the Commission to undertake Appropriate Assessment (AA) and assessment of impacts to wider ecological receptors. I have read all the relevant documents

pertaining to the original application and response to Further Information documentation including the Natura Impact Statement, Report on Supporting Ecological Surveys, Outline Construction and Environmental Management Plan, Noise Impact Statement, Hydrological Investigation, Further Information Response to Submissions document and drawings including the Proposed Landscape Plan and Construction Management.

2.0 Background

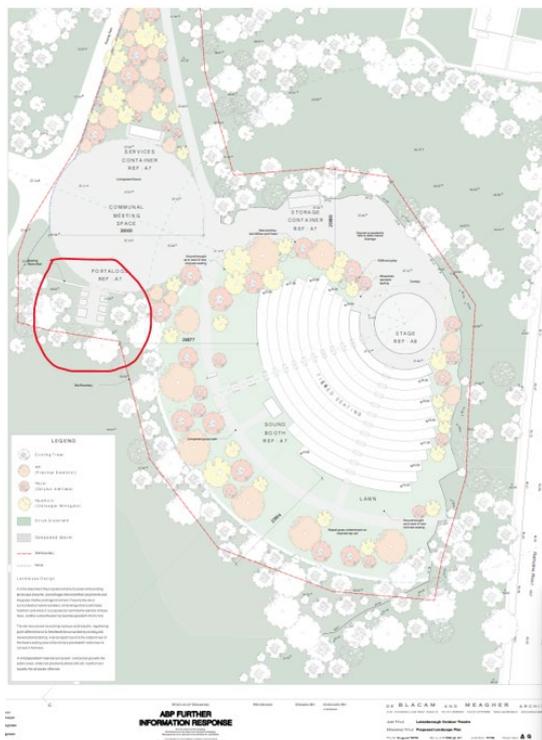
- 2.1. The applicant, Longford County Council, submitted a revised Natura Impact Statement (NIS), and a Report on Supporting Ecological in response to a further information request by ACP.
- 2.2. The proposed Lanesborough Outdoor Theatre development, site area 0.618 ha (6,180 sqm), is set in a former lime quarry which is currently a Council Depot, situated along a public access route leading from Lanesborough village, through a large area of amenity grassland along the shore of Lough Ree to Rathcline Woods. The development will comprise tiered seating (500 seats) in a landscaped embankment, with a stage with a canvas / steel canopy.
- 2.3. The habitats on site have been assessed in accordance with A Guide to Habitats in Ireland (Fossitt, 2000). The development site is an active council compound with exposed rock face of the old quarry (ER1), stockpiles of soil and stone aggregate (ED2), recolonising bare ground (ED2) and scrub vegetation (WS1) has developed on the less disturbed areas. Rathcline Woods (also known White Sand Wood) is classified as wet willow alder ash woodland (WN6) in the NIS and borders the compound area to the south.
- 2.4. In response to the observations of the Development Applications Unit, the applicant submitted a new Appropriate Assessment Screening Report & Natura Impact Statement report which includes habitat, wintering and breeding bird surveys undertaken during the appropriate seasons. In addition, hydrogeological investigations were carried out by AquaGeo Services to inform the assessment on potential hydrological pathways to surrounding habitats.

- 2.5. A report on supporting ecological surveys for proposed development was also submitted which provides survey findings and impact assessment for species protected under the Wildlife Acts including bats and amphibians.

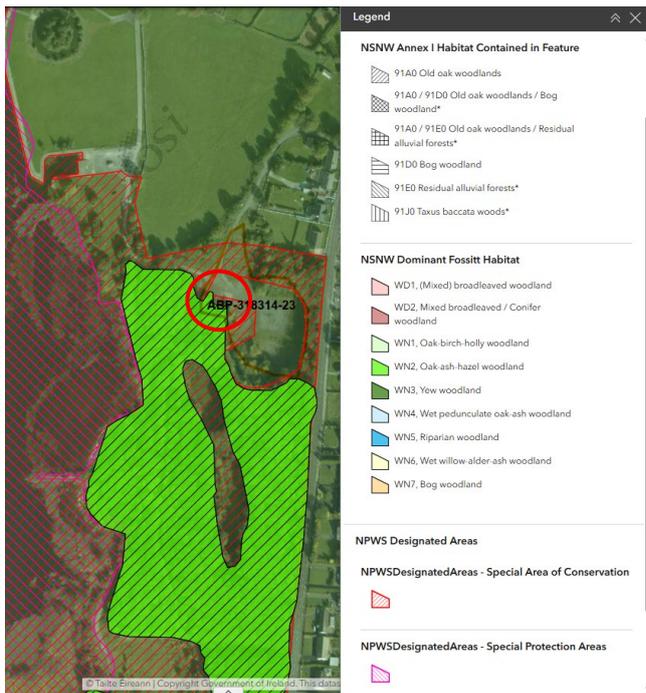
3.0 Assessment and Recommendations

Implications for European Sites - Habitats

- 3.1. With reference to Item 5 in the DAU submission to the original application “*Areas of habitat removal have not been identified*” I feel that this item has not been adequately assessed in the further information response documentation. The areas of habitat loss, particularly within the boundary of Lough Ree SAC have not been presented. It is noted that the habitats within the development site, for the most part, are disturbed and reflect the previous quarry and current council compound activities. My main concern however is the woodland habitat bordering the compound area to the south which is within the boundary of Lough Ree SAC and is proposed location for the temporary storage of Portaloos, as indicated in the Proposed Landscape Plan drawing DWG No. A9, see below, area of interest indicated in red circle.



3.2. From the National Survey of Native Woodlands (NSNW) 2003-2008 database the woodland bordering the development site is classified under Fossitt (2000) as Oak-ash-hazel woodland (WN2) and corresponds with the Annex I habitat [91A0] Old sessile oak woods with Ilex and Blechnum in the British Isles, see figure below, area of interest indicated in red circle. The area of interest is within the planning application boundary for ABP-318314-23 and corresponds in the legend to habitat 91A0 and WN2.



3.3. Habitat 91A0 is listed in the Conservation Objectives for Lough Ree (NPWS 2016), which states that the status of same is under review as a Qualifying Interest (QI) for Lough Ree SAC and it has subsequently not been included in the Statutory Instrument (S.I. No. 466 of 2023). There is disagreement in the classification of this habitat between the original NIS which classifies it as Oak-ash-hazel woodland (WN2) and the NIS submitted as part of further information classified as Wet willow, alder, ash woodland (WN6).

3.4. I am inclined to agree with the WN2 classification as the NSNW 2003-2008 comprises a rigorous assessment supported by relevés which captures data on vascular plant and bryophyte cover abundance, soil type and soil chemistry, notable lichens, stand structure, and natural regeneration. Detailed species lists have not been provided in either NIS, therefore it is difficult to refute the NSNW classification.

As the woodland is not a QI of Lough Ree SAC it is not assessed under the statutory Appropriate Assessment. Where its significance lies is that it is an Annex I habitat and valuable habitat for local wildlife. Removal of this habitat for temporary storage of portalooos seems like unnecessary loss of semi-natural habitat when there are areas of disturbed ground, hard standing and improved grassland within the development boundary that could amply accommodate such facilities. I recommend that this area is excluded from the grant of permission, if you are minded to do so, and other areas of hardstanding available within the development site are identified for temporary Portaloo storage.

- 3.5. QI habitat which is found in proximity to the development site includes Lough Ree which is classified as Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation [3150] and Limestone pavements [8240] which was recorded outside the development site boundary on the shores of Lough Ree. I am satisfied that there will be no direct effects on QI habitats 3150 and 8240, however there is potential for indirect effects to Lough Ree habitat 3150 during the construction phase of the proposed development via potential hydrogeological connectivity from the site to the lake as outlined in the Hydrogeological Investigation Report (Aqua GeoServices, 2025) that both point and diffuse recharge occurs within the groundwater body at the site, exhibiting a very rapid response to recharge. *“The lack of surface water drainage in the vicinity of the quarry confirms that potential recharge readily percolates into the groundwater system.”*
- 3.6. An ephemeral pond or so called ‘sump’ in the Hydrogeological Investigation Report, was identified along the southern boundary of the proposed development site as stated in the NIS *“...is likely remnant basic from quarry activities.”* As karst wetland features have been identified in the neighbouring woodlands, I was concerned that this pond could be a direct conduit to groundwater and ultimately to Lough Ree. However, water levels in the sump were monitored as part of Hydrogeological Investigation Report and it was concluded that the water levels within the sump are consistent with ponding water and are not connected to either groundwater or surface water.

Implications for European Sites – Species

Otter

- 3.7. The DAU submission on the original application (dated 10th January 2024) outlined perceived deficiencies in the AA screening report and the NIS relating to an inadequate consideration of potential impacts on protected habitats and species. It is noted that the FI does not include any additional targeted surveys for Otter. In the absence of specific otter surveys, in my professional opinion the habitats within the proposed development site do not provide otter with suitable foraging or resting habitat and I am satisfied that there will not be a direct impact on the species. However, there is potential for indirect impacts to the species during the construction stage as a result of water pollution and disturbance impacts during the operation of the proposed development.
- 3.8. Through the implementation of the Construction Phase mitigation measures set out in the NIS Section 8.1 and the Report on Supporting Ecological Surveys Section 5 Lighting Design (also see NIS Section 3.3), and the recommendations in the Noise Impact Assessment (Allegro Acoustics, 22nd August 2025) with regards to number, placement, and directivity of loudspeaker, the potential for adverse effects can be excluded. In addition, noise monitoring is to be carried out at the ecological receiver locations during events.

Birds

- 3.9. Wintering and breeding birds surveys were carried out during peak seasons. The habitats within the proposed development site do not provide suitable habitat for SCI species of Lough Ree SPA, therefore there will be no direct impact to the SPA. However, there is potential for indirect impacts to the species during the construction stage as a result of water pollution and disturbance impacts during the operation of the proposed development.
- 3.10. Through the implementation of the Construction Phase mitigation measures set out in the NIS Section 8.1 and the Report on Supporting Ecological Surveys Section 5 Lighting Design (also see NIS Section 3.3), and the recommendations in the Noise Impact Assessment (Allegro Acoustics, 22nd August 2025) during the operation with

regards to number, placement, and directivity of loudspeaker, the potential for adverse effects can be excluded. Please note that noise monitoring is to be carried out at the ecological receiver locations during events.

Implications for Biodiversity

Amphibians

- 3.11. The Report on Supporting Ecological Surveys submitted with the Further Information documentation include the findings of the bat and amphibian surveys conducted on site, which focused on the quarry and the immediate environs.
- 3.12. Amphibian surveys carried out during in the breeding season at the ephemeral pond within the proposed development site found no evidence of breeding frogs or newts, however it is noted in the report that this could be attributed to recent disturbance at the pond from activities at the compound. The report highlights that there is also an inaccessible pond within the woodland to the south that would provide suitable habitat for the species, the location is shown in Figure 5.1 and within the “Zone of ecological importance”.
- 3.13. Through the implementation of mitigation measures set out in the Report on Supporting Ecological Surveys Section 5.2, the Hydrological Investigation Mitigation Measures Section V and A10 Outline Construction Management drawing, specifically the Zone of Ecological Importance, and protection of amenity grasslands during events, impacts to amphibians can be minimised.

Bats

- 3.14. In the Report on Supporting Ecological Surveys, it is evident that the proposed development site and surrounding habitats provides suitable foraging habitat for bats and the exposed rock face of the disused quarry is identified as providing potential bat roost habitat for several species. However, the DAU note in their submission on Further Information, that the Report does not provide details on observational roost emergence data to provide quantitative evidence on the relative importance of this habitat as a roost site within a geographical context.

- 3.15. The exposed quarry face is vulnerable to disturbance during the construction stage and operation of the proposed development.
- 3.16. Through the implementation of the mitigation measures set out in the Report on Supporting Ecological Surveys Section 5.1 relating to lighting and noise impacts to bats will be minimised. It is also recommended that no vegetation is removed from the exposed quarry face to ensure that any potential roosting habitat is not disturbed during the construction phase. Additional real-time noise monitoring is to be carried at the quarry face during events and with a suitably qualified bat expert to engage with noise engineers to manage noise impacts as required.

Landscaping plan

- 3.17. Due to the proximity to designated European Sites, the landscaping plan must prioritise the protection and enhancement of biodiversity using native species of Irish provenance.
- 3.18. The species list for the proposed scrub grassland is not provided; however it must include 100% native species of Irish provenance suitable for the local soil conditions.
- 3.19. The species mix for the lawn grassland is also not provided; however it must include 100% native species of Irish provenance suitable for the local soil conditions
- 3.20. Due to the proximity of sensitive ecosystems, vulnerable to water pollution, there will be no application of fertilizer or other chemicals into grasslands and landscaped areas within the site. If possible, source grass seed from green hay sourced from a local area of species rich grassland can be scattered in the target areas. In new areas identified for species diverse grassland, topsoil from excavations within the site during construction will be put aside and spread on these areas, to ensure a seed bank of local provenance is in place to allow this habitat to establish.

Signed

Paula Kearney

Inspectorate Ecologist

19/01/2026