



An
Coimisiún
Pleanála

Inspector's Report

PL-501093-LK-26

Development

Provision of additional scrubber and associated site works. This is a existing Lower Tier Seveso site, and the development consists of modifications to an establishment within the meaning of the European Communities Chemicals Act (IPC) Licence

Location

Analog Devices B.V Limited,
Cloghkeating Avenue, Raheen Business
Park, Ballycummin, Limerick

Planning Authority

Limerick City and County Council

Planning Authority Reg. Ref.

2660086

Applicant(s)

Analog Devices International Unlimited
Company

Type of Application

Permission

Planning Authority Decision

Grant

Type of Appeal

Third Party

Appellant(s)

Tom Ryan

Observer(s)

Environmental Protection Agency (EPA)

Date of Site Inspection

30th June 2026

Inspector

Clare Clancy

Contents

1.0 Site Location and Description	5
2.0 Proposed Development	5
3.0 Planning Authority Decision	6
3.1. Decision	6
3.2. Planning Authority Reports	6
3.3. Prescribed Bodies	7
3.4. Third Party Observations	7
4.0 Planning History	8
5.0 Policy Context	9
5.1. National Policy	9
5.2. Regional Spatial and Economic Strategy for the Southern Region 2019-2031	9
5.3. Limerick Development Plan 2022-2028 (as varied)	9
5.4. Natural Heritage Designations	12
6.0 EIA Screening	13
7.0 The Appeal	13
7.1. Grounds of Appeal	13
7.2. Applicant Response	14
7.3. Planning Authority Response	17
7.4. Observations	17
8.0 Assessment	18
8.2. Principle of Development	19
8.3. Surface Water	20
8.4. Third Party Issues	21

8.5. Other Matters	21
9.0 AA Screening.....	22
10.0 WFD Screening	23
11.0 Recommendation	23
12.0 Reasons and Considerations.....	24
Appendix 1 – Form 1 EIA Pre-Screening	25
Appendix 2 – Appropriate Assessment Screening	28
Appendix 3 – WFD Screening	51

1.0 Site Location and Description

- 1.1. The appeal site is located within the existing Analog Devices International (ADI) premises at the north eastern side of the Raheen Industrial Estate, which is situated approx. 4.5 km to the southwest of Limerick City centre (as the crow flies). The subject site with a stated area of 0.020 ha is proposed to be located adjacent to the existing manufacturing building, on the eastern side.
- 1.2. The site comprises of an existing industrial / manufacturing plant facility, associated administration buildings, stores and car parking areas. There is a network of internal access roads serving the appeal site as follows; the Ballynoe Road is located to the southeast, Ballycummin Avenue is located to the northeast, the Lurraga Road bounds the existing building to the northwest and Cloughkeating Avenue is located to the southwest. The adjoining buildings surrounding the site comprise of Analog Devices Campus buildings.

2.0 Proposed Development

- 2.1. Permission is sought for the provision of plant equipment in the form of an additional (backup) scrubber (no. 5) adjacent to an existing similar scrubber plant within the existing utility compound of the AD campus. The proposed development is as follows:
 - Area of site – 0.020 ha
 - Excavate 2 no. footpad areas to depth of c. 2.0 m below ground level
 - Construct extension to the existing steel elevated scrubber deck to accommodate new plant
 - Install new plant, associated discharge flues with interconnected ducting, and associated electrical and mechanical equipment
 - All associated works including connection to existing site infrastructure
- 2.2. The following is noted:
 - The site is an existing Lower Tier Seveso Site and the proposed development entails modifications to an establishment within the meaning of the European Communities Chemicals Act (Control of Major Accident Hazards Involving Dangerous Substances) Regulations.

- The overall Analog Devices facility operates under a current Integrated Pollution Licence (IPC) (P0224-04) which is currently under review.
- Existing connection to public water mains and public sewer
- Proposed surface water disposal – connect new drains to existing underground drainage which is connected to existing overall internal ADI campus storm drainage network

2.3. The application is accompanied by the following supporting documents:

- Planning Statement Report (Brady Shipman)
- Screening for Appropriate Assessment (AA) – Byrne Ó Cléirigh

3.0 Planning Authority Decision

3.1. Decision

By Order dated 18th March 2026, Limerick City and County Council decided to grant permission for the proposed development subject to four conditions. The conditions included relate to payment of a development contribution and the management of surface water.

3.2. Planning Authority Reports

3.2.1. Planning Reports

One planning report forms the basis of the assessment and recommendation. The following is noted:

- The principle of the proposed development is acceptable as it complies with the land use zoning of the site.
- The nature of the proposed development relates to a filtration device that is used to capture gases, particles, chemicals from air in large spaces, prior to release into the atmosphere.
- There are 4 existing scrubbers on site.

- There will be no change or increase in activity throughput or in emissions to the environment.
- Emission limits are set and managed by the EPA under an IPC licence.
- The proposed development was acceptable having regard to the site context.
- Noted that excavation works would be to a dept of 2.0 m. Ground water monitoring is carried out biannually and in compliance with IPC licence conditions. The level of ground water in the vicinity of the proposed development is at least 10 m below ground level (BGL).
- Surface water at construction and operational stages will discharge to existing stormwater system before joining the Raheen Business Park surface water network which discharges via a man-made surface water attenuation lagoon Loughmore Canal.
- A Stage 2 Appropriate Assessment and an EIA Screening determination was not required and screened the proposed development out.

3.2.2. Other Technical Reports

- Heritage Officer (18/03/2026) – No objection raised having regard to distance from European Sites and the management of surface water via the existing storm water network system at operational stage.
- Fire & Emergency Department (09/03/2026) – No objection raised.

3.3. Prescribed Bodies

- HSA (18/02/2026) – No objection.

3.4. Third Party Observations

One Third Party observation was received from Tom Ryan. The issues raised are similar to those raised in the grounds of appeal.

4.0 Planning History

There is extensive planning history related to the appeal site (between Lurraga Rd and Derrybeg Road) and also within the wider ADI campus. The relevant and most recent planning history for the subject site is summarised as follows:

Area adjoining appeal site (between Lurraga Rd and Ballynote Rd):

- ABP Ref. 313700-22 & ABP Ref. 313740-22, PA Ref. 2238 – permission granted for new liquid hydrogen storage tank, alterations to existing equipment, removal of existing liquid hydrogen storage tank (07/09/2023).
- ABP Ref. 314692-22, PA. Ref. 22803 – 10-year permission granted to extend the C1 R&D Pilot Line & first industrial deployment/ manufacturing use in the proposed C2 fanfare building (12/09/2023).
- ACP Ref. 323395-25, P.A. Ref. 2560508 – Appeal dismissed (alterations to external envelope of existing manufacturing facility) (02/10/2025).
- ABP Ref. 318396-23, P.A. Ref. 2360609 – 10-year planning permission granted for the regeneration of a building and site (site of former Provencial Flooring premises). This comprised the partial demolition (2,505.8 m²) and redevelopment and construction of an extension (5,697.93 m²) to an existing warehousing structure (19/02/2025).
- PL501114-LK-26, P.A. Ref. 2660069 – Construction of Liquid Nitrogen Facility (HPN) and associated site works. Lower tier Seveso site, Integrated Pollution Control (IPC) Licence. Decision pending.
- ACP-324255-26 – Section 5 Referral – determination pending.

Whether the subdivision of the former provincial flooring premises involving the severing of the rear external storage compound from the remainder of the premises & the extension of the adjoining Analog Devices International Complex (ADIC) by incorporating the fPFp external storage compound within the storage compound installing of 2 no. nitrogen storage tanks and associated vaporiser units & associated works at rear of the former Provincial Flooring premises at Ballycummin, Raheen Business Park, Limerick is or is not development or is or is not exempted Development.

To south of Derrybeg Rd:

- ABP Ref. 322557-25, P.A. Ref. 2560174 – Appeal dismissed (alterations to existing building replacement of cladding with glazing) (24/07/2025).

5.0 Policy Context

5.1. National Policy

➤ Climate Action Plan 2025

- The Climate Action Plan 2025 (CAP25) is the third Climate Action Plan to be prepared under the Climate Action and Low Carbon Development (Amendment) Act 2021.
- The purpose of the Climate Action Plan is to lay out a roadmap of actions which will ultimately lead us to meeting our national climate objective of pursuing and achieving, by no later than the end of the year 2050, the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy. It aligns with the legally binding economy-wide carbon budgets and sectoral emissions ceilings that were agreed by Government in July 2022.

➤ National Biodiversity Action Plan 2023-2030

- Ireland's 4th National Biodiversity Action Plan (NBAP) sets the national biodiversity agenda for the period 2023-2030 and aims to deliver the transformative changes required to the ways in which we value and protect nature.

5.2. Regional Spatial and Economic Strategy for the Southern Region 2019-2031

- Raheen Business Park is also recognised as a key employment location in the Regional Economic and Spatial Strategy (RSES) for the Southern Region.

5.3. Limerick Development Plan 2022-2028 (as varied)

➤ Chapter 5 Strong Economy

Policy ECON P4 – Urban Economy

It is a policy of the Council to:

- a) Promote, facilitate and enable economic development and employment generating activities in Limerick City Centre, at Strategic Employment Locations and other appropriately zoned locations in a sustainable manner.
- b) Facilitate the future sustainable economic development of Limerick City and Suburbs (in Limerick), Mungret and Annacotty to optimise the benefits of its strategic location in the Limerick Shannon Metropolitan Area, in accordance with the National Planning Framework and the Regional Spatial and Economic Strategy.

Objective ECON O17 – Strategic Employment Locations City and Suburbs (in Limerick), Mungret and Annacotty

It is an objective of the Council to:

- a) Promote, facilitate and enable a diverse range of employment opportunities by facilitating appropriate development, improvement and expansion of enterprise and industry on appropriately zoned lands, accessible by public and sustainable modes of transport, subject to compliance with all relevant Development Management Standards and Section 28 Guidance at Strategic Employment Locations and other appropriately zoned locations in a sustainable manner.
- b) Facilitate and support Limerick City Centre, University Hospital Limerick, Raheen Business Park, the National Technology Park, Higher Education Institutes, Public Hospitals, Dock Road, Northside Business Campus, Opera Centre and Cleeves Site as Strategic Employment Locations, identified in accordance with the Limerick Shannon Metropolitan Area Strategic Plan.

➤ **Chapter: 6 Environment, Heritage, Landscape and Green Infrastructure**

Objective EH O15 Ground Water, Surface Water Protection and River Basin Management Plans

This objective relates to the protection of ground and surface water resources taking account of the requirement of the Waster Framework Directive, implementing the provisions of the *River Basin Management Plan 2022-2028, the Limerick Groundwater Protection Plan*.

➤ **Chapter: 8 Infrastructure**

Objective IN O12 Surface Water and SuDS

In summary, it is an objective to reduce water pollution, protect surface waters and prevent flooding by ensuring separation of foul and surface water discharges, maintaining and improving drainage infrastructure, promoting and requiring SuDS and Nature Based Solutions, and encouraging green roofs. In particular, the following is noted:

- c) Maintain, improve and enhance the environmental and ecological quality of surface waters and groundwater, including reducing the discharges of pollutants or contaminants to waters, in accordance with the National River Basin Management Plan for Ireland 2018-2021 (DHPLG) and the associated Programme of Measures and any subsequent River Basin Management Plan.
- f) Address the issue of disposal of surface water generated by existing development in the area, through improvements to surface water infrastructure, including for example attenuation ponds, the application of sustainable urban drainage techniques, or by minimising the amount of hard surfaced areas, or providing porous surfaces as the opportunity arises.
- h) Require all planning applications to include surface-water design calculations to establish the suitability of drainage between the site and the outfall point and require all new developments to include SuDS, to control surface water outfall and protect water quality in accordance with the requirements of Chapter 11: Development Management Standards of the Plan.
- j) Require SuDS schemes to be designed to incorporate the four pillars of water quality, water quantity, biodiversity and amenity to the greatest extent possible within the constraints of a given site.

➤ **Chapter 11: Development Management Standards**

- Section 11.3.11 SuDS (Sustainable Drainage Systems)

In summary, the following is noted:

- Previously developed sites which are being redeveloped should aim to achieve greenfield run off rates.

- Storm Water Management Plans should have regard to Department of the Environment, Heritage and Local Government The Planning System and Flood Risk Management (Nov 2009 – Guidelines for Planning Authorities); CIRIA Manual C753 – The SuDS Manual (2015); Greater Dublin Strategic Drainage Study - GDSDS (2005) and current best practise.
- A list of criteria will be considered in assessing proposals for surface water and SuDS schemes as part of planning applications.

➤ **Chapter: 12 Land Use Zoning Strategy**

• Land Use Zoning

Zoning – ‘High Tech/Manufacturing Campus’.

Objective – To provide for office, research and development, high technology, regional distribution/ logistics, manufacturing and processing type employment in a high quality built and landscaped campus style environment.

Purpose – ‘To facilitate opportunities for high technology, advanced manufacturing including pharmaceutical and food production, major office, regional distribution/ logistics, and research and development-based employment, within high quality, highly accessible, campus style settings. The zoning is for high value-added businesses and corporate facilities that have extensive/specific land requirements, such as those located at Raheen Business Park and the National Technology Park. These businesses are generally not accessible to members of the public. Retail warehousing will not be acceptable in this zone.

The uses in this zone are likely to generate a considerable amount of traffic by both employees and service vehicles. Sites should be highly accessible, well designed and permeable with good pedestrian, cyclist and public transport links. The implementation of mobility management plans will be required to provide important means of managing accessibility to these sites’.

5.4. **Natural Heritage Designations**

- Lower River Shannon SAC 002165 – c. 2.15 km to the north and c. 7.2 km to the west.

- River Shannon & River Fergus SPA 00407 – c. 2.7 km to the north and c. 7.02 to the west.
- pNHA Inner Shannon Estuary South Shore 000435 – c. 2.3 km to north and c. 7.6 km to the west.
- pNHA Loughmore Common Turlough 000438 – c. 875 m to west.

6.0 EIA Screening

- 6.1.1. The proposed development is not a class for the purposes of EIA as per the classes of development set out in Schedule 5 of the Planning and Development Regulations 2001, as amended (or Part V of the 1994 Roads Regulations). No mandatory requirement for EIA therefore arises and there is also no requirement for a screening determination. Refer to Form 1 in Appendix 1 of report.

7.0 The Appeal

7.1. Grounds of Appeal

One Third Party appeal was received from Tom Ryan. The grounds of appeal may be summarised as follows:

- The PA failed to carry out an adequate environmental appraisal of the proposed development including AA screening and an EIA screening to assess environmental evidence submitted with application. This includes failure to consider environmental evidence submitted with the objection and the findings in an independent environmental assessment report by Tetra Tech (2024) which identified the presence of pollutants linked to industrial activity, and confirmed the connectivity between surface water and groundwater within the karst system.
- The receiving environment for the proposed development is the Loughmore Canal, Loughmore Turlough, Barnakyle stream and Barnakyle River, an underlying karst limestone aquifer which are all interconnected and form a highly vulnerable hydrogeological environment in which pollutants migrate through pathways and enter groundwater bodies.

- There is an ongoing issues of pollution affecting theses waters.
- The PA's AA screening concluded that there is no hydrological connection between the proposed development and the European site. This is not based on objective scientific evidence e.g. drainage surveys, CCTV inspections, dye testing or certification of drainage integrity. The planning report confirms that surface water from the site discharges to the Loughmore Canal and to the Barnakyle River. A hydrological pathway therefore exists. The PA have not demonstrated the absence of hydrological connectivity to the required standard.
- The issue of misconconnections within Raheen Business Park drainage infrastructure has not been addressed.
- The decision fails to comply with the Water Framework Directive. The development is located in a hydrologically sensitive catchment connected to groundwater and surface water.
- The PA's conclusion that EIA is not required is flawed. While not listed under Schedule 5, it is a sub-threshold development as the proposed development is located within a sensitive karst groundwater system, on a Seveso regulated site, and within an area with known contamination issues. At a minimum there is significant and realistic doubt regarding the likelihood of environmental effects which the PA did not adequately consider.
- The PA failed to consider cumulative impacts in the context of the Raheen Business Park which has been subject to extensive industrial development. The potential cumulative impact of existing and permitted developments on the Loughmore Canal and associated groundwater system has not been addressed.

7.2. Applicant Response

A response to the grounds of appeal was received by the applicant which may be summarised as follows:

Appropriate Assessment (AA)

- The PA lawfully undertook an AA screening under Section 177U of the Planning and Development Act 2000 (as amended) and correctly concluded that a Stage 2 AA was not required.
- The appeal does not identify any European site likely to be significantly affected by the proposed development, nor does it establish a credible source–pathway–receptor connection.
- Surface water management is controlled through planning conditions requiring collection and discharge via the existing public surface water sewer.
- The appeal relies on general environmental sensitivities in the wider area rather than project-specific scientific evidence demonstrating likely significant effects.

Hydrological Pathway Allegations

- The appeal claims that surface water from the wider site ultimately drains to the Loughmore Canal and Barnakyle River and argues that drainage verification testing has not been provided. The applicant rejects the assertion that the development creates any hydrological pathway to a European site.
- The proposal involves the installation of an additional scrubber within an existing utility compound and does not create new surface water outfalls. Existing planning conditions require all surface water to be collected within the site's drainage system and discharged to the public sewer, with no discharge to adjoining lands.
- Given the limited scale and nature of the development, there is no objective basis for concluding that significant effects on any European site could arise.

Environmental Impact Assessment (EIA)

- The appeal is based on speculative concerns and general environmental context rather than project-specific evidence capable of undermining the PA's EIA screening determination.
- The PA assessed the proposal in accordance with Schedule 5 of the Planning and Development Regulations 2001 (as amended) and concluded that EIA was not required because:
 - The development is small in scale and clearly defined.

- No new emissions, waste streams or operational impacts are introduced beyond those already authorised and regulated.
- The development is located within an established industrial environment.
- There is no evidence of likely significant environmental effects arising from the proposal.

Water Framework Directive (WFD)

- The appeal alleges non-compliance with the WFD but does not identify any specific mechanism by which the development would cause deterioration in water quality or prevent achievement of environmental objectives.
- The proposal does not introduce new discharge points, and existing planning conditions require surface water to be collected and discharged to the public sewer network.
- The facility also operates under an existing IPC licence governing environmental performance. In the absence of project-specific evidence, the WFD concerns are considered speculative.

Cumulative Impacts

- The appeal argues that cumulative impacts were not assessed. However, the development is a minor addition within an established industrial campus and does not introduce new emissions or discharges.
- No project-specific evidence has been provided to demonstrate any plausible cumulative effects attributable to the proposal.

Alleged Failure to Consider Environmental Evidence

- The PA considered all relevant material submitted by the appellant. Much of the evidence relied upon relates to historic or general environmental conditions in the wider area and does not demonstrate likely significant effects arising from the installation and operation of Scrubber No. 5.
- Claims regarding drainage misconnections and wider hydrological connectivity are unsupported by evidence showing that the proposed development would alter drainage pathways or adversely affect water quality.

- The appeal will be considered de novo by the Commission. Therefore, even if alleged deficiencies in the PA's report were accepted, they would not invalidate the permission where the Commission is satisfied that the statutory tests have been properly applied.
- The appeal should be dismissed because:
 - No project-specific evidence has been provided to justify a Stage 2 AA.
 - No basis has been established for requiring an EIA.
 - The appeal relies largely on generalised and speculative assertions rather than objective scientific evidence relating to the proposed development.

7.3. Planning Authority Response

7.4. Observations

The Commission notified the Environmental Protection Agency (EPA) that the proposed development is within a site subject to an Integrated Pollution Control Licence (IPC) and invited observations in relation to same. The following response was received:

EPA (26/05/2026)

- Anaolog Devices International Unlimited Company hold an IPC licence (Reg. No. P0224-04) granted 13th January 2022 for the manufacture of integrated circuits and printed circuit boards which is currently under review (Reg. No. P0224-05). It relates to classes of activity:
 - *12.2.1 The surface treatment of substances, objects, or products using organic solvents, in particular for dressing, printing, coating, degreasing, waterproofing, sizing, painting, cleaning or impregnating, with the consumption capacity of more than 150 KG per hour or more than 200 tons per year;*
 - *13.2 The manufacture of integrated circuits and printed circuit boards.*
- The review application was not accompanied by an Environmental Impact Assessment Report.

- An EIA was not required for the activity to which the licence review application relates.
- The activity to which the planning application relates and licence review application relates, does not appear to be of a type listed in Schedule 5 of the Planning and Development Regulations 2001, as amended and EIA is not required.
- Should the Commission find otherwise, and should a licence review application be received which addresses the changes proposed, the associated EIAR would be required to be submitted in support of the licence review application.

8.0 **Assessment**

8.1. The grounds of appeal have raised numerous issues in regard to the Planning Authorities assessment of the proposed development in the context of its AA screening vis a vis a direct hydrological connection between the subject site and the Loughmore Canal, and the consequential impacts to receiving water bodies from same and to European site's downstream, arising from the proposed development. It is also submitted that the PA did not adequately assess the cumulative effects arising from the proposed development or considered the environmental report submitted by the appellant in the context of its EIA screening assessment. Notwithstanding the matters raised, this assessment considers the planning merits of the proposed development on a site-specific basis, and seeks to carry out an appraisal of the proposed development in the context of Appropriate Assessment, Environment Impact Assessment, and Water Framework Directive Assessment, and represents my *de novo* consideration of all planning issues material to the proposed development, including the issues raised by the third party appellant, and all other submissions and observations to the planning application and to the appeal.

8.1.1. Having examined the application details and all other documentation on file, including all of the submissions received in relation to the appeal, the reports of the local authority, and having inspected the site, and having regard to the relevant local/regional/national policies and guidance, I consider that the substantive issues in this appeal to be considered are as follows:

- Principle of Development

- Surface Water
- Third Party Issues
- Other Matters

8.2. Principle of Development

- 8.2.1. I note that the nature of the proposed development relates to the provision of additional plant equipment to enable manufacturing operations to continue seamlessly in such scenarios whereby maintenance works or other upgrade works are required, should any of the existing scrubbers be off-line.
- 8.2.2. The initial proposal and the development description submitted to the PA, applied for the provision of plant, in the form of an additional scrubber (no. 5) to be located adjacent to the existing scrubber plant already in situ, mounted on an elevated platform which is described in the application details as a scrubber deck, including associated electrical plant equipment.
- 8.2.3. Based on the plans and drawings submitted with the application and pursuant to site inspection, I observed that the scrubber deck platform and the ancillary electrical and mechanical equipment at ground level had been constructed. As the works have been undertaken and the proposed development partially completed, I therefore have concerns regarding the development description of the proposed development. Procedurally, it is my opinion that as the development has already commenced, the development description is not what had been applied for initially, and I note that in its current context, it would more appropriately be the retention of these works carried out. Therefore in this case, I consider that the development description is misleading and that the existing development would require a revised description of development and revised plans and drawings to reflect same. I note that the applicant's response to the grounds of appeal did not refer to the existing works carried out. Having regard to the foregoing, I consider that the Commission should refuse permission for the proposed development on the basis that the development description is misleading.
- 8.2.4. Notwithstanding the foregoing and should the Commission not agree with my appraisal of the matters raised and recommendation to refuse the principle of the proposed development, I will assess the development overall to enable the Commission to

consider the merits of the proposed development in accordance with the proper planning and sustainable development of the area, which is set out below.

- 8.2.5. The appeal site is located within the existing Analog Devices International (ADI) Campus within the Raheen Business Park. The proposed development will occupy a footprint of 0.020 ha and will adjoin the existing scrubber facilities. It will be mounted on a scrubber deck platform raised above ground and will have a max height of 19.3 m which will be consistent with the height of the adjoining scrubber exhaust. It will be enclosed by acoustic cladding and the design generally assimilates the existing scrubber facilities in terms of layout, scale and material finishes.
- 8.2.6. The subject site is zoned High Tech/Manufacturing Campus the objective for which is 'to provide for office, research and development, high technology, regional distribution/logistics, manufacturing and processing type employment in a high quality built and landscaped campus style environment'. The proposed development is considered to be a minor development having regard to the existing site context. Therefore having regard to the zoning objective for the site, I consider the proposed development to be acceptable in principle.

8.3. Surface Water

- 8.3.1. The development involves the installation of plant equipment on new 'foot' slabs proposed to be constructed upon an existing hardstanding surface. Having regard to the design of the structure, there would be no foul water runoff from same. It states in the AA screening report that it is proposed to dispose of surface water runoff from the new plant deck to ADI's process wastewater treatment plant which then discharges to the storm water sewer network serving the wider Raheen Business Park. I note that the proposed development does not seek to alter the existing on site surface water drainage system serving the overall development. It will therefore not result in any significant additional surface water runoff beyond that already occurring on site from the adjoining similar development, as it does not seek to extend the area of hardstanding within the site. I further note that there will be no direct discharge to groundwater. I am therefore satisfied that it will not result in any additional impacts on the wider Business Park storm water network.

8.4. Third Party Issues

- 8.4.1. The grounds of appeal has raised that the PA's assessment of the proposed development in the context of AA and EIA screening failed to adequately assess the environmental risks of the proposed development in the context of a hydrological pathway from the subject site to the Loughmore Canal, Loughmore Turlough, Barnakyle stream and Barnakyle River. In particular, it refers to a direct hydrological connection between the subject site and European sites by discharge of surface water to the Loughmore Canal and the European site(s) downstream. It also raises that the decision failed to comply with the Water Framework Directive and that there are misconnections in the foul and storm water network within the Raheen Business Park drainage system.
- 8.4.2. While I acknowledge the concerns raised by the appellant, I have dealt with Appropriate Assessment screening for the proposed development which is attached in Appendix 2 and in Section 9.0 of this report. The conclusion of the AA Screening is made on the basis of the information provided with the application and appeal, and in view of the conservation objectives for the identified European sites. I have carried out an EIA screening in Appendix 1 of this report and in Section 6.0 above and have concluded on same. I have also carried out an assessment of the proposed development having regard to the Water Framework Directive as per Appendix 4 of this report. I have concluded that any potential for surface water discharge that may give rise to impacts at construction and operational stages are adequately mitigated for by the implementation of a Construction Environmental Management Plan (CEMP) at construction stage. At operational stage, I have further concluded and recommend the implementation of conditions of planning in relation to surface water runoff management, which will ensure that the proposed development is compliant with objectives of the WFD. Having regard to the matters raised in the grounds of appeal, these assessments therefore represent my *de novo* consideration of all planning issues material to the proposed development including those raised in submissions to the planning application and the issues raised by the third party appellant.

8.5. Other Matters

Ongoing Water Pollution & Misconnections

- 8.5.1. Other matters raised in the grounds of appeal relate to misconnections in the foul and storm water network within the Business Park which has not been addressed, and to ongoing issues with water quality being discharged from the Business Park to the Loughmore Canal. The issues as raised are noted, however such matters regarding wider water pollution issues related to the Raheen Business Park and misconnections are outside of the scope of this appeal. In this regard, my assessment of the proposed development relates specifically to the scope of development as proposed and the impacts associated with same, if any. Other matters raised regarding misconnections to the foul and storm water network within the wider business park or unauthorised development are for the relevant enforcement authorities to address and are not within the remit of the Commission.

9.0 AA Screening

- 9.1. In accordance with Section 177U of the Planning and Development Act 2000 (as amended) and on the basis of the information considered in this AA screening, I conclude that the proposed development individually or in combination with other plans or projects would not be likely to give rise to significant effects on the Lower River Shannon SAC (002165) and River Shannon and River Fergus Estuaries (SPA 004077) sites, in view of the Conservation Objectives of those sites and Appropriate Assessment and submission of an NIS is therefore not required.

This determination is based on:

- The nature and scale of the development on fully serviced lands on a brownfield site;
- Scientific information provided in the AA Screening report and in the EPA IPC licence for the site;
- Distance from and weak indirect connections to the European sites;
- No ex-situ impacts on birds;

Possible impacts identified would not be significant in terms of site-specific conservation objectives for the Lower River Shannon SAC (002165) and River Shannon and River Fergus Estuaries (SPA 004077) sites and would not undermine the maintenance of favourable conservation condition or delay or undermine the

achievement of restoring favourable conservation status for those qualifying interest features of unfavourable conservation status.

No mitigation measures aimed at avoiding or reducing impacts on European sites were required to be considered in reaching this conclusion.

10.0 WFD Screening

An assessment of the proposed development has been undertaken in accordance with Article 4 of the EU Water Framework Directive (2000/60/EC), as transposed by the European Communities (Water Policy) Regulations 2003, as amended, and with regard to the Eastern/South Eastern River Basin Management Plan 2022–2027.

The receiving water environment has been identified and assessed, see Appendix 3 attached. Having regard to the nature, scale, and location of the proposed development, and the mitigation measures conditioned it is concluded that the proposed development will not:

- Result in deterioration of the ecological, chemical, or quantitative status of any relevant surface water or groundwater body;
- Increase pollutant loading or alter the hydrological regime of any receiving watercourse;
- Prevent or impede achievement of environmental objectives under the applicable River Basin Management Plan;

Any residual risks are capable of being addressed through the implementation of a Construction Environmental Management Plan (CEMP).

The proposed development is considered to be in compliance with the requirements of Article 4 of the Water Framework Directive.

11.0 Recommendation

Having regard to the foregoing, I recommend that permission is refused for the reasons and consideration set out below.

12.0 Reasons and Considerations

1. The proposed development for which planning permission is sought differs from the existing characteristics of the appeal site and the statutory notices, in that works have already been undertaken in relation to the development as proposed. In this regard, it is considered inappropriate to grant permission in a circumstance where the statutory description of the proposed development is not consistent with the existing status of the site the subject of the appeal. The proposed development would, therefore, be contrary to proper planning and sustainable development.

I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence, directly or indirectly, the exercise of my professional judgement in an improper or inappropriate way.

Clare Clancy
Planning Inspector

10th July 2026

Appendix 1 – Form 1 EIA Pre-Screening

Case Reference	PL-501093-LK-26
Proposed Development Summary	Permission is sought for the provision of plant equipment in the form of an additional (backup) scrubber (no. 5) to be mounted on an elevated platform deck adjacent to an existing similar scrubber plant and ancillary plant electrical equipment within the existing utility compound of the AD campus.
Development Address	Analog Devices B.V Limited , Ballynoe Road Cloughkeating Avenue Raheen Business Park, Ballycummin Limerick
IN ALL CASES CHECK BOX / OR LEAVE BLANK	
1. Does the proposed development come within the definition of a 'Project' for the purposes of EIA?	☒ Yes, it is a 'Project'. Proceed to Q.2.
	☐ No, No further action required.
(For the purposes of the Directive, "Project" means: - The execution of construction works or of other installations or schemes, - Other interventions in the natural surroundings and landscape including those involving the extraction of mineral resources)	
2. Is the proposed development of a CLASS specified in Part 1, Schedule 5 of the Planning and Development Regulations 2001 (as amended)?	
☐ Yes, it is a Class specified in Part 1.	State the Class here

EIA is mandatory. No Screening required. EIAR to be requested. Discuss with ADP.	
☒ No, it is not a Class specified in Part 1. Proceed to Q3	
3. Is the proposed development of a CLASS specified in Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) OR a prescribed type of proposed road development under Article 8 of Roads Regulations 1994, AND does it meet/exceed the thresholds?	
☒ No, the development is not of a Class Specified in Part 2, Schedule 5 or a prescribed type of proposed road development under Article 8 of the Roads Regulations, 1994. No Screening required.	
☐ Yes, the proposed development is of a Class and meets/exceeds the threshold. EIA is Mandatory. No Screening Required	State the Class and state the relevant threshold
☐ Yes, the proposed development is of a Class but is sub-threshold. Preliminary examination required. (Form 2) OR If Schedule 7A information submitted proceed to Q4. (Form 3 Required)	State the Class and state the relevant threshold

4. Has Schedule 7A information been submitted AND is the development a Class of Development for the purposes of the EIA Directive (as identified in Q3)?	
Yes ☐	
No ☒	Pre-screening determination conclusion remains as above (Q1 to Q3)

Inspector: _____ Date: _____

Appendix 2 – Appropriate Assessment Screening

Screening for Appropriate Assessment Test for likely significant effects	
Case Reference Number: PL-501093-26-LK	
Step 1: Description of the project and local site characteristics	
Brief description of project	Permission is sought for the provision of plant equipment in the form of an additional (backup) scrubber (no. 5) to be mounted on an elevated platform deck adjacent to an existing similar scrubber plant and ancillary plant electrical equipment within the existing utility compound of the AD campus. The overall ADI site is subject to an EPA IPC licence (P0224-4).
Brief description of development site characteristics and potential impact mechanisms	The appeal site is located within the overall ADI Campus in Raheen Business Park and is a brownfield site surrounded by similar type developments. The subject site has a stated area of 0.020 ha, is of an industrial nature and will be adjacent to the existing manufacturing building, on the eastern side.

	Groundworks and excavation will be limited to a footprint area of 0.020 ha and will entail excavation works for the provision of 2 no. footpad areas to a depth of approx. 2.0 m BGL. The AA screening report notes that from biannual ongoing groundwater monitoring carried out at the ADI campus (in compliance with IPC licence conditions) the groundwater levels in the vicinity of the subject is at least 10 m BGL. An extension will be constructed to the existing steel elevated scrubber deck to accommodate new plant which will be installed, associated discharge flues with interconnected ducting and associated electrical & mechanical equipment. The plant deck is of steel fabrication, will be positioned above ground, and upon which the scrubber will be installed. There will be little requirement for storage of construction material on site. All associated connection & commission works to connect to existing infrastructure. Surface water runoff from the proposed plant deck will discharge to the existing stormwater drainage system serving the site, and onto the stormwater foul sewer serving the Raheen Business Park.
--	---

	Construction phase anticipate to occur over approx. 16 week period. The nearest European sites are: • Lower River Shannon SAC 002165 – c. 2.15 km to the north and c. 7.2 km to the west. • River Shannon & River Fergus SPA 00407 – c. 2.7 km to the north and c. 7.02 to the west. There are no watercourses or other ecological features of note on site that would connect it directly to European Sites in the wider area. The Loughmore Canal is located approx. 875 m to the west of the site. There is indirect surface water connectivity to the Loughmore Canal via the existing storm water drainage network which intercepts drainage in the Raheen Business Park.
Screening report	Yes – Appropriate Assessment Screening Report (Byrne Ó Cléirigh)
Natura Impact Statement	No
Relevant submissions	• EPA observation to the appeal • Third Party observations – issues raised regarding stormwater drainage network of

	the Raheen Business Park and the transport of contaminants conveyed to the Loughmore Canal, Barnakyle River and onto European sites. • Heritage Officer report Limerick City & County Council – noted the following: - Will ensure ongoing coverage of operations and has positive implications for airborne emissions arising from plant - Small footprint, surface water runoff to existing drainage system - No impact to European sites
Step 2. Identification of relevant European sites using the Source-pathway-receptor model I note that Table 1 of the AA Screening Report identified a total of 5 no. European Sites within a 15 km radius of the subject site and carried out an initial screening assessment for same. These included for: Lower River Shannon SAC (Site Code 002165), River Shannon and River Fergus Estuaries SPA (Site Code 004077), Tory Hill SAC (Site Code 000439), Askeaton Fern Complex SAC (Site Code 002279) and Curraghchase Woods SAC (Site Code 000174). Table 1 of the AA Screening Report identified the Lower River Shannon SAC (Site Code 002165), River Shannon and River Fergus Estuaries SPA (Site Code 004077) for further screening and discounted the remainder on the basis of no ecological connection to these site from the appeal site. Therefore having reviewed same, I am satisfied that these sites can be excluded from further consideration due to distance and lack of/ weak ecological connections.	

European Site (code)	Qualifying interests ¹ Link to conservation objectives (NPWS, date)	Distance from proposed development (km)	Ecological connections ²	Consider further in screening ³ Y/N
Lower River Shannon SAC (Site Code 002165)	Habitats (14) <u>Marine/ coastal habitats:</u> ▪ Sandbanks (110), ▪ Estuaries (1130), ▪ Mudflats & Sandflats (1140), ▪ Coastal Lagoons (1150*), ▪ Large shallow inlets & bays (1160), ▪ Reefs (1170) <u>Coastal terrestrial habitats:</u> ▪ Perennial vegetation of stony banks (1120) ▪ Vegetated sea cliffs of the Atlantic & Baltic coasts (1230)	Lies c. 2.15 km to the north and c. 7.2 km to the west of the appeal site.	No direct connection/ pathway. indirect weak hydrological connection via existing Raheen Business Park stormwater drainage system outfall – Loughmore Canal. Distance of pathway >8.5 km	Y

	▪ Salicornia & other annuals colonising mud and sand (1310) ▪ Atlantic salt meadows (1330), ▪ Mediterranean salt meadows (1410) ▪ Freshwater and terrestrial habitats: ▪ Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation (3260), ▪ Molinia meadows on calcareous, peaty or clayey-silt-laden soils (6410), ▪ Alluvial forests with Alnus glutinosa and Fraxinus excelsior91E0 Species (7): <u>Fish and lampreys:</u> ▪ Freshwater Pearl Mussel (1029), ▪ Sea Lamprey (1095),			
--	---	--	--	--

	▪ Brook Lamprey (1096), ▪ River Lamprey (1099), ▪ Salmon (1106) <u>Mammals:</u> ▪ Bottlenose Dolphin (1349), ▪ Otter (1355). <u>Conservation Objectives</u>			
River Shannon & River Fergus SPA (Site Code 004077)	Habitat Feature (1) • Wetlands and Waterbirds (A999) Species Features (21) <u>Waterfowl:</u> • Whopper Swan (A038), • Light-bellied Brent Goose (A046), • Shelduck (A048), • Wigeon (A855), • Teal (A052), • Pintail (A054), • Shoveler (A857), • Scaup (A062)	Lies c. 2.7 km to the north and c. 7.02 to the west of appeal site.	No direct connection. Indirect weak hydrological connection via existing Raheen Business Park stormwater drainage system outfall – Loughmore Canal. Distance of pathway >8.5 km	Y

	<u>Waders:</u> • Ringed Plover (A137), • Golden Plover (A140), • Grey Plover (A141), • Lapwing (A142), • Knot (A143), • Dunlin (A149), • Black-tailed Godwit (A146), • Bar-tailed Godwit (A157), • Curlew (A160), • Redshank (A162), • Greenshank (A164) <u>Other Birds:</u> • Cormorant (A017), • Black-headed Gull (A179) Conservation Objectives			
¹ Summary description / cross reference to NPWS website is acceptable at this stage in the report ² Based on source-pathway-receptor: Direct/ indirect/ tentative/ none, via surface water/ ground water/ air/ use of habitats by mobile species				

³ if no connections: N

Step 3. Describe the likely effects of the project (if any, alone or in combination) on European Sites

AA Screening matrix

Site name Qualifying interests		Possibility of significant effects (alone) in view of the conservation objectives of the site*	
Site 1		Impacts	Effects
Lower River Shannon SAC (002165)		<u>Direct – No impact</u> No direct impacts and no risk of habitat loss, fragmentation or any other direct impact due to the site characteristics and the distance to the European site. There is no physical encroachment. The AA screening report notes that from biannual ongoing groundwater monitoring carried out at the ADI campus (in compliance with IPC licence conditions) the groundwater levels in the vicinity of the subject is at	Deterioration in water quality during the construction phase and operational phase could arise which could undermine the conservation objectives set for water quality targets and to water dependent species. Surface water runoff from hardstanding areas and roofs associated with the proposed development will discharge to the existing stormwater drainage system serving the ADI facility which discharges to the Raheen Business Park stormwater network.
QI/SCI	CO		
1029 Freshwater Pearl Mussel <i>Margaritifera margaritifera</i>	To restore the favourable conservation condition of Freshwater Pearl Mussel in the Lower River Shannon SAC.		
1095 Sea Lamprey <i>Petromyzon marinus</i>	Maintain populations and habitat; ensure free passage		
1096 Brook Lamprey <i>Lampetra planeri</i>	Maintain populations and habitat; ensure free passage		

1099 River Lamprey <i>Lampetra fluviatilis</i>	Maintain populations and habitat; ensure free passage	least 10 m BGL concluding that there is no S-P-R connectivity between the proposed facility and any European site via groundwater. <u>Indirect – Potential Impact</u> Localised, temporary, low magnitude impacts from construction related emissions to surface water during construction. Release of silt and sediment during site works from runoff Release of construction related compounds including hydrocarbons to surface water	The ADI campus has an existing IPC licence issued by the EPA which covers all emissions from the facility including emissions to air and water. Given the contained nature of the site which is a brownfield site (serviced, defined site boundaries, no direct ecological connections or pathways) with the proposed development located centrally within the existing ADI facility and distance from receiving features connected to the SAC, make it highly unlikely that the proposed development could generate impacts of a magnitude that could affect water quality within the SAC for the SCI listed. Conservation objectives would not be undermined.
1106 Atlantic Salmon <i>Salmo salar</i> (only in fresh water)	Restore favourable conservation condition; population targets, free spawning access		
1349 Bottlenose Dolphin <i>Tursiops truncatus</i>	Maintain population, habitat quality and usage pattern Stable; ~107 individuals (est.), highly site-faithful		
1355 Otter <i>Lutra lutra</i>	Maintain populations and habitat. Present and widespread in site		
1110 Sandbanks which are slightly covered by sea water all the time	Maintain favourable conservation condition. Stable, area: 1,353 ha		
1130 Estuaries	Maintain favourable conservation condition. Stable/increasing, area: 24,273 ha		
1140 Mudflats and sandflats not covered by seawater at low tide	Maintain favourable conservation condition. Stable/increasing, area: 8,808 ha		

1150 *Coastal lagoons	Maintain favourable conservation condition. Poor conservation status nationally		
1160 Large shallow inlets and bays	Maintain favourable conservation condition. Stable/increasing		
1170 Reefs	Maintain favourable conservation condition. Stable distribution and area		
1220 Perennial vegetation of stony banks	Maintain favourable conservation condition. No decline, stable/increasing area		
1230 Vegetated sea cliffs of the Atlantic and Baltic coasts	Maintain favourable conservation condition. Maintain range and structure		
1310 Salicornia and other annuals colonizing mud and sand	Maintain favourable conservation condition. Stable/increasing, 0.22 ha		
1330 Atlantic salt meadows (Glauco-Puccinellietalia maritimae)	Restore favourable conservation condition. Target: increasing extent; 495.4 ha		
1410 Mediterranean salt meadows	Restore favourable conservation condition. Target:		

(Juncetalia maritimi)	increasing extent; 48 ha		
3260 Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation	Maintain favourable conservation condition. Maintain structure & supporting species		
6410 Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae)	To maintain the favourable conservation condition of Molinia meadows (Molinion caeruleae) in the Lower River Shannon SAC, the habitat must have stable or increasing area and distribution (subject to natural processes), a broadleaf herb:grass ratio of 40–90%, 30–70% of the sward between 10–80 cm high, at least 7 positive indicator species including one "high quality" species, no decline in notable species, negative indicator species		

	collectively under 20% cover (none over 10%, and non-native invasives absent or controlled), specific limits on moss cover (bog moss under 10%, hair moss under 25%), woody species and bracken under 5% cover, and no more than 10% bare ground.		
91E0 *Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (Alno-Padion, Alnion incanae, <i>Salicion albae</i>)	To restore the favourable conservation condition of alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (91E0) in the Lower River Shannon SAC by ensuring a stable or increasing area and distribution, diverse and native woodland structure with adequate regeneration and dead wood, protection of veteran trees and local distinctiveness, appropriate hydrology, and control of negative indicator (especially invasive) species.		

	Likelihood of significant effects from proposed development (alone): No			
	If No, is there likelihood of significant effects occurring in combination with other plans or projects? No Other plans and projects were examined in the applicant’s AA Screening Report. Reference is made to the findings of EPA assessments of stormwater quality related to EPA licensed sites in Raheen Business Park including ADI IPC licence P0224-04 and other companies within the business park concluding that the “findings of the data in assessments did not indicate any risk to stormwater quality from any of the four license sites”. Also, “each licenced site is complying with licencing conditions relative to drainage system integrity and material handling arrangements at this time”.			
Site 2.	Impacts	Effects		
River Shannon & River Fergus SPA (Site Code 004077)	As above	Deterioration in water quality during the construction phase and operational phase could arise which could undermine the conservation objectives set for water quality targets and to water dependent species.		
<table><tr><td>QI/SCI</td><td>CO</td></tr></table>	QI/SCI	CO		
QI/SCI	CO			

Cormorant <i>Phalacrocorax carbo</i>	Maintain favourable conservation condition: stable breeding abundance, productivity, breeding distribution, prey biomass, connectivity, disturbance; stable or increasing long-term trend and non-breeding range/timing/intensity of use (see notes).		Surface water runoff from hardstanding areas and roofs associated with the proposed development will discharge to the existing stormwater drainage system serving the ADI facility and will discharge to the Raheen Business Park stormwater network. The ADI campus has an existing IPC licence issued by the EPA which covers all emissions from the facility including emissions to water.
Whooper Swan <i>Cygnus cygnus</i>	Maintain favourable conservation condition: stable or increasing long-term trend and stable range/timing/intensity of use (non-breeding).		Given the contained nature of the site which is a brownfield site (serviced, defined site boundaries, no direct ecological connections or pathways) with the proposed development located centrally located within the existing ADI facility and distance from receiving features connected to the SPA, make it highly unlikely that the proposed development could generate impacts of a magnitude that could affect water, habitat
Light-bellied Brent Goose <i>Branta bernicla hrota</i>	Maintain favourable conservation condition: stable or increasing long-term trend and stable range/timing/intensity		

	of use (non-breeding).		quality within the SPA for the SCI listed. No significant disturbance to any SCI birds (ex-situ).
Shelduck <i>Tadorna tadorna</i>	Maintain favourable conservation condition: stable or increasing long-term trend and stable range/timing/intensity of use (non-breeding).		Surface water runoff arising from the proposed development will pass through an existing bypass interceptor before discharge to the existing stormwater network serving the overall business park.
Wigeon <i>Anas penelope</i>	Maintain favourable conservation condition: stable or increasing long-term trend and stable range/timing/intensity of use (non-breeding).		Conservation objectives would not be undermined.
Teal <i>Anas crecca</i>	Maintain favourable conservation condition: stable or increasing long-term trend and stable range/timing/intensity of use (non-breeding).		

Pintail <i>Anas acuta</i>	Maintain favourable conservation condition: stable or increasing long-term trend and stable range/timing/intensity of use (non-breeding).		
Shoveler <i>Anas clypeata</i>	Maintain favourable conservation condition: stable or increasing long-term trend and stable range/timing/intensity of use (non-breeding).		
Scaup <i>Aythya marila</i>	Maintain favourable conservation condition: stable or increasing long-term trend and stable range/timing/intensity of use (non-breeding).		
Ringed Plover <i>Charadrius hiaticula</i>	Maintain favourable conservation condition: stable or increasing long-term		

	trend and stable range/timing/intensity of use (non-breeding).		
Golden Plover <i>Pluvialis apricaria</i>	Maintain favourable conservation condition: stable or increasing long-term trend and stable range/timing/intensity of use (non-breeding).		
Grey Plover <i>Pluvialis squatarola</i>	Maintain favourable conservation condition: stable or increasing long-term trend and stable range/timing/intensity of use (non-breeding).		
Lapwing <i>Vanellus vanellus</i>	Maintain favourable conservation condition: stable or increasing long-term trend and stable range/timing/intensity		

	of use (non-breeding).		
Knot <i>Calidris canutus</i>	Maintain favourable conservation condition: stable or increasing long-term trend and stable range/timing/intensity of use (non-breeding).		
Dunlin <i>Calidris alpina</i>	Maintain favourable conservation condition: stable or increasing long-term trend and stable range/timing/intensity of use (non-breeding).		
Black-tailed Godwit <i>Limosa limosa</i>	Maintain favourable conservation condition: stable or increasing long-term trend and stable range/timing/intensity of use (non-breeding).		
Bar-tailed Godwit <i>Limosa lapponica</i>	Maintain favourable conservation condition: stable or increasing long-term trend and stable range/timing/intensity		

	of use (non-breeding).		
Curlew <i>Numenius arquata</i>	Maintain favourable conservation condition: stable or increasing long-term trend and stable range/timing/intensity of use (non-breeding).		
Redshank <i>Tringa totanus</i>	Maintain favourable conservation condition: stable or increasing long-term trend and stable range/timing/intensity of use (non-breeding).		
Greenshank <i>Tringa nebularia</i>	Maintain favourable conservation condition: stable or increasing long-term trend and stable range/timing/intensity of use (non-breeding).		
Black-headed Gull <i>Chroicocephalus ridibundus</i>	Maintain favourable conservation condition: stable or increasing long-term trend and stable range/timing/intensity of use (non-breeding).		

Wetlands	Maintain favourable conservation condition of wetland habitat, with permanent area stable and not significantly less than 32,261 ha (other than due to natural variation).		
		Likelihood of significant effects from proposed development (alone): No	
		If No, is there likelihood of significant effects occurring in combination with other plans or projects? No Other plans and projects were examined in the applicant's AA Screening Report. Reference is made to the findings of EPA assessments of stormwater quality related to EPA licensed sites in Raheen Business Park including ADI IPC licence P0224-4 and other companies within the business park concluding that the "findings of the data in assessments did not indicate any risk to stormwater quality from any of the four license sites". Also, "each licenced site is complying with licencing conditions relative to drainage system integrity and material handling arrangements at this time".	

Step 4: Conclude if the proposed development could result in likely significant effects on a European site

I conclude that the proposed development (along or in combination with other plans or projects) would not result in likely significant effects on European sites. No further assessment is required for the project.

No mitigation measures are required to come to these conclusions.

Screening Determination

Finding of no likely significant effects

In accordance with Section 177U of the Planning and Development Act 2000 (as amended) and on the basis of the information considered in this AA screening, I conclude that the proposed development individually or in combination with other plans or projects would not be likely to give rise to significant effects on the Lower River Shannon SAC (002165) and River Shannon and River Fergus Estuaries (SPA 004077) sites, in view of the Conservation Objectives of those sites and Appropriate Assessment and submission of an NIS is therefore not required.

This determination is based on:

- The nature and scale of the development on fully serviced lands on a brownfield site;
- Scientific information provided in the AA Screening report and in the EPA IPC licence for the site;
- Distance from and weak indirect connections to the European sites;
- No ex-situ impacts on birds;
- Possible impacts identified would not be significant in terms of site-specific conservation objectives for the Lower River Shannon SAC (002165) and River Shannon and River Fergus

Estuaries (SPA 004077) sites and would not undermine the maintenance of favourable conservation condition or delay or undermine the achievement of restoring favourable conservation status for those qualifying interest features of unfavourable conservation status.

No mitigation measures aimed at avoiding or reducing impacts on European sites were required to be considered in reaching this conclusion.

Appendix 3 – WFD Screening

WFD IMPACT ASSESSMENT STAGE 1: SCREENING			
Step 1: Nature of the Project, the Site and Locality			
An Coimisiún Pleanála ref. no.	PL-501093-LK-26	Townland, address	Analog Devices B.V Limited, Ballynoe Road Cloughkeating Avenue Raheen Business Park, Ballycummin Limerick
Description of project		Permission is sought for the provision of plant equipment in the form of an additional (backup) scrubber (no. 5) adjacent to an existing similar scrubber plant within the existing utility compound of the AD campus.	
Brief site description, relevant to WFD Screening,		The characteristics of the site comprise of an existing industrial/ manufacturing plant facility, associated administration buildings, stores and car parking areas which the appeal site is located within centrally. It is located within the Raheen Industrial/ Business Park. The site is serviced by public water and the existing surface water network on the site receives runoff discharges which conveys to the existing Raheen Business Park stormwater system network.	
Proposed surface water details		Surface water runoff from existing roofs and hardstanding areas discharges to the existing Raheen Business Park stormwater drainage system network from the appeal site via the existing surface water sewer serving the site and then discharging to the business park stormwater drainage system network. The existing storm sewer network ultimately	

	discharges to the Loughmore Canal which is located c. 875 m to the west of the site which conveys to the Barnakyle River.
Proposed water supply source & available capacity	The site is connected to the existing public water mains.
Proposed wastewater treatment system & available capacity, other issues	The site is connected to the existing public sewer.
Others?	No

Step 2: Identification of relevant water bodies and Step 3: S-P-R connection

Identified water body	Distance to (m)	Water body name(s) (code)	WFD Status	Risk of not achieving WFD Objective e.g.at risk, review, not at risk	Identified pressures on that water body	Pathway linkage to water feature (e.g. surface runoff, drainage, groundwater)
River Waterbody	c. 1.6 km to east	BALLYNACLOGH_010 IE_SH_24B050600	Moderate	At risk	Ag, UR	Surface water runoff drains

							from proposed development will drain to existing surface water and onto the existing storm water/sewer system network which serves the overall area Business Park.
Ground Waterbody	Underlying site	Limerick City Southwest IE_SH_G_141	Good	At risk	Agriculture		Via surface water run-off
Step 4: Detailed description of any component of the development or activity that may cause a risk of not achieving the WFD Objectives having regard to the S-P-R linkage.							
CONSTRUCTION PHASE							
No.	Component	Water body receptor (EPA Code)	Pathway (existing and new)	Potential for impact/ what is the possible impact	Screening Stage Mitigation Measure*	Residual Risk (yes/no) Detail	Determination** to proceed to Stage 2. Is there a risk to the water environment? (if 'screened' in or

							'uncertain' proceed to Stage 2.
1.	Surface	BARNAKYLE_020 IE_SH_24B050600	Existing surface water drainage system serving the site which discharges to the storm sewer network in the Raheen Business Park which discharges to the Loughmore Canal conveying to the Barnakyle waterbody. Runoff from construction activity is a potential risk.	Siltation, hydrocarbon spillages	Standard Construction practice CEMP	No	Screened out
2.	Ground	Limerick City Southwest IE_SH_G_141	No direct discharge to ground water, surface water runoff managed by existing. Surface water drainage system serving the site discharging to the wider Raheen Business Park storm water sewer	Hydrocarbon Spillages	Standard Construction practice CEMP	No	Screened out

			network which the proposed development will continue to discharge to.				
OPERATIONAL PHASE							
1	Surface	BALLYNACLOGH_010 IE_SH_24B050600	Existing surface water drainage system serving the site discharging to the wider Raheen Business Park storm water sewer network. The proposed development will continue to discharge to the existing system.	Potential for Hydrocarbon Spillages	Implementation of conditions of permission re surface water management	No	Screened out
42	Ground	Limerick City Southwest IE_SH_G_141	No direct discharge to ground water, surface water runoff managed by existing. Surface water drainage system serving the site discharging to the wider Raheen Business Park storm water sewer network which the proposed development will continue to discharge to.	None	Implementation of conditions of permission re surface water management	No	Screened out

DECOMMISSIONING PHASE							
1.	NA	NA	NA	NA	NA	NA	NA

