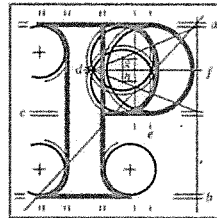


Our Case Number: ACP-323410-25



**An
Coimisiún
Pleanála**

David Fleming
Coolan House
Callahy
Tuamgraney
Co. Clare

Date: 09 October 2025

Re: Proposed Limerick City Greenway (UL to NTP)
Within the townlands of Dromroe, Sreelane, Newcastle and Castletroy, Co. Limerick.

Dear Sir / Madam,

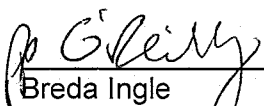
An Coimisiún Pleanála has received your recent submission (including your fee of €50) in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter.

Please note that the proposed road development shall not be carried out unless the Commission has approved it or approved it with modifications.

If you have any queries in the mean time, please contact the undersigned officer of the Commission at laps@pleanala.ie

Please quote the above mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,


Breda Ingle
Executive Officer
Direct Line: 01-8737291

HA02

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Glao Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

COOLAN HOUSE
CALLAHY, TUAMGRANEY
COUNTY CLARE

An Coimisiún Pleanála,
64 Marlborough Street,
Dublin 1.

6 October 2025

Regarding the proposed Limerick City Greenway (University of Limerick to National Technology Park) Project, within the townlands of Sreelane, Newcastle and Castletroy, County Limerick.

Case reference number: HA91.323410

To the Commissioners,

The proposed development of a ‘Greenway’ along the river Shannon will cut through the Lower River Shannon Special Area of Conservation (SPA 002165). The **EU Habitats Directive** legally requires the avoidance of any project that may have a **negative impact** on the site's ecological integrity. Indeed, the aim of the Habitats Directive is to maintain or restore the favourable conservation status of habitats and species of interest. The proposed greenway is both located within the SAC or runs along its boundary. Either way, it is proposed to use the existing riverbank path to build a wide, tarmacadamed track, altering what is a naturalised, verdant landscape.

The River Shannon is a critical ecosystem, supporting an extraordinary variety of species, habitats, and communities. When a river lies within a Special Area of Conservation (SAC), its protection becomes not just important, but essential. The law requires us to ensure the long-term conservation of this river, including its banks for environmental, and social reasons. While greenways offer recreational and tourism benefits, placing one through or adjacent to a Special Area of Conservation risks serious, irreversible damage to fragile habitats and species. The short-term gain of a greenway must not come at the expense of long-term ecological loss.

This Special Area of Conservation is home to **rare, sensitive, and legally protected species**, such as nesting birds, amphibians, cormorants, bats, and herons, that rely on peace, darkness, and undisturbed habitats. Increased human presence, noise, artificial lighting, and pet disturbance from greenway users can **stress or displace wildlife**, disrupt breeding, and even cause population decline.

Constructing this greenway will involve clearing vegetation and mature trees, altering terrain, and installing drainage or lighting infrastructure. These changes will **fragment habitats**, creating barriers for species movement, reducing biodiversity, and increasing vulnerability to invasive species.

COOLAN HOUSE
CALLAHY, TUAMGRANEY
COUNTY CLARE

Greenways have been noted to attract many more visitors to an area than would otherwise appear, which increases the risk of **litter and pollution** (plastic, dog waste, chemicals), **soil erosion and sedimentation** into rivers and mill streams, and **water quality deterioration** in aquatic ecosystems. Even small disturbances in Special Areas of Conservation ecosystems can cause **long-term ecological harm**, especially to sensitive species like salmon, which breed in the shallow waters adjacent to the University.

The proposed greenway goes under the existing pedestrian bridge linking the north and south sides of the University of Limerick campus, which part of the path **floods in most winters** (not noticed in the developer's proposals). It is impossible to raise the path (and indeed the proposed Greenway) at this point owing to the structure of the bridge at this area.

The proposed development is for a piece of urban transport infrastructure and out of place in an **unspoilt, natural landscape**. It is wholly unnecessary as there are existing and recently upgraded active travel routes on Plassey Park Road.

I am also concerned that the designed **eighteenth-century landscape**, which created the mill-stream that forms part of Sreelane at the University of Limerick will be significantly altered in terms of the paths and railings that are proposed as part of the Greenway. I am seriously concerned that the development will remove **over sixty mature trees**, including those identified as protected and forming part the 'outstanding collection' of the University of Limerick's Arboretum. The proposal to replace these trees with younger planting is a retrograde measure in terms of ecological protection.

I recommend that you do not grant permission for this development. To do so would irreversibly damage this natural habitat and ecosystem that has remained largely undisturbed from major human intervention for at least three centuries.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'David Fleming', written in a cursive style.

Professor David Fleming