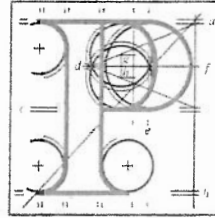


Our Case Number: ACP-323410-25



**An
Coimisiún
Pleanála**

Maria Kelly
6 Monaleen Heights
Castletroy
Co. Limerick

Date: 14 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.

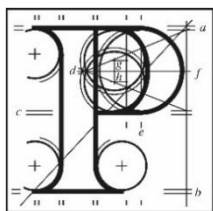
Yours faithfully,


Breda Ingle
Executive Officer
Direct Line: 01-8737291

HA02

Tel	Tel	(01) 858 8100
Glaos Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	communications@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902



An
Bord
Pleanála

Observation on a Strategic Infrastructure Development Application

Observer's details

1. Observer's details (person making the observation)

If you are making the observation, write your full name and address.

If you are an agent completing the observation for someone else, write the observer's details:

(a) Observer's name

Maria Kelly

(b) Observer's postal address

6 Monaleen Heights, Castletroy, Limerick

Agent's details

2. Agent's details (if applicable)

If you are an agent and are acting for someone else **on this observation**, please **also** write your details below.

If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

Click or tap here to enter text.

(b) Agent's postal address

Click or tap here to enter text.

Postal address for letters

3. During the process to decide the application, we will post information and items to you or to your agent. For this **current application**, who should we write to? (Please tick ✓ one box only)

You (the observer) at the postal address in Part 1

☒

The agent at the postal address in Part 2

☐

Details about the proposed development

4. Please provide details about the **current application** you wish to make an observation.

- (a) **An Bord Pleanála case number for the current application (if available)**
(for example: 300000)

Click or tap here to enter text.

- (b) **Name or description of proposed development**

Limerick City Greenway – UL to NTP

- (c) **Location of proposed development**

(for example: 1 Main Street, Baile Fearainn, Co Abhaile)

West of the River Groody bridge, along an existing section of paved and gravel pathway along the River Shannon, from the University of Limerick (UL) to the National Technology Park (NTP) in Castletroy, Limerick.

Observation details

5. Grounds

Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below. There is **no word** limit as the box expands to fit what you write.

You can also insert photographs or images in this box. (See part 6 – Supporting materials for more information).

Developments that support active travel and reduce car usage are generally welcome, but they must be developed in a way that fits with the natural environment and does not have any undue adverse effects on biodiversity. This is particularly important in Ireland as we are one of the most nature depleted countries on Earth. A fact borne out by many reports including a recent European Environment Agency report which rates the state of nature in Ireland as very poor. This report published on the 28th September 2025, found that 85% of Ireland's protected habitats and almost one third of protected species of flora and fauna have an unfavourable status. Over half of our native plant species are in decline and more than 50 bird species are of high conservation concern, our water quality is also rated as poor, with no net improvement in river or lake quality. The report states that significant measures are needed to address declines in these areas, highlighting the urgency for scaled up action to protect and hopefully restore what is left of our fragile ecosystems. That is why I believe developments such as the proposed Greenway from the University of Limerick (UL) to the National Technology Park (NTP) must be weighed up against their potential to negatively impact biodiversity and nature versus the overall requirement for a development of this scale. In particular, I would ask the Bord to consider the following:

5. Grounds

- The necessity for such a highly engineered design which is an extension to an already developed smarter travel route from Limerick City to UL. This 4KM link from UL to the NTP will involve almost doubling the size of existing pathways, the construction of new pathways on greenfield areas, dismantling of existing bridges, construction of five new bridges, requiring 4 temporary compounds and 4 haul roads. All at a cost of over €10M. This seems excessive and unnecessary and the design is more in keeping with an urban environment than a natural, semi-rural river landscape. It should be noted the riverbank walk as it currently exists, is a public amenity that is widely used by the local community (including students and employees going to UL and NTP) so how much active travel will actually increase as a result of this development? If it hasn't been articulated, surely the risks are too great for an ill-defined benefit.
- While the designers have clearly taken steps to assess the likely significant effects of the proposed development on biodiversity and put in place mitigation measures, the proposal states there is potential to negatively affect the status of the designated sites the Lower River Shannon SAC and the River Shannon and River Fergus Estuaries SPA including:
 - High levels of silt from construction beside rivers can impact spawning habitats.
 - There is the potential to spread Himalayan balsam and Giant Hogweed.
 - The potential to impact on the water quality of the study area watercourses through release or run-off of suspended solids from site preparation or development of construction materials, accidental release of cement or contaminated materials from the

5. Grounds

site to watercourses, unintentional discharge of oil/diesel from the worksite to watercourses.

- Potential risk of contamination of groundwater through spills or leaks from hazardous substances used on site during construction.
 - Extensive areas of vegetation will need to be cleared in advance of construction works because it will require four temporary construction compounds, typically measuring 40m x 40m and 313m of haul roads.
- The proposal states that there will be both a permanent and temporary loss of habitats as a result of the project, it will result in medium-term habitat loss, fragmentation and disturbance to habitats classified as of Local (lower) and Local (higher) importance. Table 6.21 in the proposal lists areas that will be impacted including mixed broadleaved woodland, wet grassland, hedgerows, riparian woodland, wet willow alder ash woodland and scrub. It states that impacts arising from disturbance to habitats will last longer than the construction period, but it is likely to be reversible over time - 7-15 years for hedges and 15-60 years for any trees. This is an extraordinary length of time considering the value of these ecosystems to our biodiversity and the urgent need for action to protect them.
- The proposal states there will be a medium magnitude of change in certain areas – in particular the Plassey Beach area, and the Plassey Mills area. These will undergo an increase in hard surfacing, vegetation removal and a localised change in character will occur. This level of change along a natural ecosystem is highly concerning.

5. Grounds

- Mature trees are keystone ecological structures offering significant physical benefits to people, such as shade and aesthetics as well as carbon sequestration and prevention of soil erosion. While the design does take steps to specifically avoid, reduce and minimise effects on the mature trees along the bank, construction often compromises the growing environment of nearby trees. The majority of tree roots are located in the top 12 to 18 inches of soil and often extend well beyond the edge of the tree canopy and construction activity with heavy machinery especially where existing bridges are being removed and replaced, only heightens the risk of long-term ecological disruption as it can compact soil around trees, hindering water absorption and root growth. Unintended damage to tree trunks and branches can open pathways for pests and diseases and negatively impact tree health. Additionally, trees are slow to reach ecological maturity and therefore difficult to replace when removed. The proposal to plant five trees for every tree that will be removed to facilitate construction will take many years before they offset the impact of any trees that are removed and damaged – as outlined above.
- Tarmac surfaces will replace gravel paths and grassways and the 3.5m wide greenway will be installed on top of the existing 1.5-2.0m wide gravel path and grass verges. As highlighted by the successful River Barrow campaign, hard surfaces like tarmac can damage the delicate ecological interface between the river and its banks which serve as a critical refuge for numerous species. These unnatural surfaces also increase the potential for chemical run off to the river.

5. Grounds

- There was no mention of breeding or resting locations for red squirrels or Irish Hares. Red squirrels which are regularly spotted by locals foraging along the proposed route, are afforded legal protection under the Wildlife Act 1976 and the Wildlife (Amendment) Act 2000. Irish Hares have also been spotted in the land that links the riverbank at Troy Castle to the McLaughlan road which will be developed to as a linkway to the NTP. Irish hares are also protected under the Wildlife Act 1976.
- The proposed development has two link roads to the NTP, one just to the east of Kilmurray village that comes out at Troy studios and a second further along, turning right at Troy Castle to meet McLaughlan Road. The second link seems unnecessary, especially considering it follows a tree lined area at the base of Cook field and then ends up in the more open natural area with rich vegetation where Hares have been spotted. Another example of the excessive nature of the design.
- Hedgerows are one of Ireland's most important natural assets and are one of Ireland's few remaining semi-natural habitats. They provide wildlife corridors for birds, insects, and mammals and act as carbon storage and flood control through deep-rooted vegetation. The construction will involve the removal of hedgerows behind the fisherman's cottages and clearing of dense vegetation and while they will be replaced, similar to trees, young plants take many years before they are established and reach ecological maturity.

In conclusion, if any upgrade of the riverbank is deemed necessary in the future, a lighter touch, more economical, soft engineering solution should be explored that will not impact negatively on biodiversity, would ideally leave an overall biodiversity net-gain, that would enhance an ecologically

5. Grounds

important area close to SAC and SPA areas, and whose design is in more keeping with the natural landscape.

Supporting materials

6. If you wish, you can include supporting materials with your observation.

Supporting materials include:

- photographs,
- plans,
- surveys,
- drawings,
- digital videos or DVDs,
- technical guidance, or
- other supporting materials.

You can insert photographs and similar items in your observation details: grounds (part 5 of this form).

If your supporting materials are physical objects, you must send them together with your observation by post or deliver it in person to our office. You cannot use the online uploader facility.

Fee

7. You **must** make sure that the correct fee is included with your observation.

Observers (except prescribed bodies)

- strategic infrastructure observation is €50.
- there is no fee for an oral hearing request

Oral hearing request

8. If you wish to [request the Board to hold an oral hearing](#), please tick the “Yes, I wish to request an oral hearing” box below.

You can find information on how to make this request on [our website](#) or by contacting us.

If you do not wish to request an oral hearing, please tick the “No, I do not wish to request an oral hearing” box.

Yes, I wish to request an oral hearing

☐

No, I do not wish to request an oral hearing

☒

Final steps before you send us your observations

9. If you are sending us your observation using **the online uploader facility**, remember to save this document as a Microsoft word or PDF and title it with:

- the case number and your name, or
- the name and location of the development and your name.

This also applies to prescribed bodies sending an observation by email.

If you are sending your observation to us by post or delivering in person, remember to print off all the pages of this document and send it to us.

For Office Use Only

FEM – Received		SIDS – Processed	
Initials		Initials	
Date		Date	

Notes