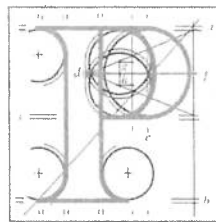


**Our Case Number:** ACP-323410-25



An  
Coimisiún  
Pleanála

University of Limerick  
Co. Limerick  
V94 T9PX

**Date:** 16 October 2025

**Re:** Proposed Limerick City Greenway (UL to NTP)

Within the townlands of Dromroe, Sreelane, Newcastle and Castletroy, Co. Limerick.

Dear Sir / Madam,

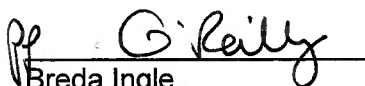
An Coimisiún Pleanála has received your recent submission (including your fee of €50) in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter.

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](mailto: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

Teil  
Glao Áitiúil  
Facs  
Láithreán Gréasáin  
Ríomhphost

Tel  
LoCall  
Fax  
Website  
Email

(01) 858 8100  
1800 275 175  
(01) 872 2684  
[www.pleanala.ie](http://www.pleanala.ie)  
[communications@pleanala.ie](mailto:communications@pleanala.ie)

64 Sráid Maoilbhríde  
Baile Átha Cliath 1  
D01 V902

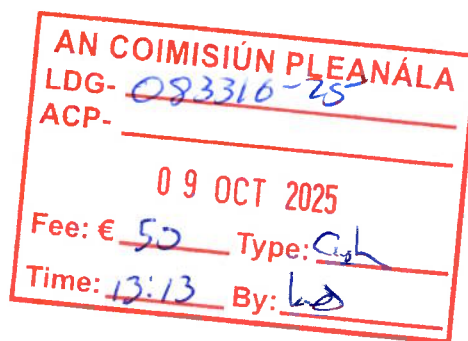
64 Marlborough Street  
Dublin 1  
D01 V902



**Ollscoil Luimnigh**  
University of Limerick

The Secretary  
An Coimisiún Pleanála  
64 Marlborough Street  
Dublin 1  
D01 V902

09 October 2025



Dear Sir/Madam

**RE: Application for the Proposed Limerick City Greenway (UL to NTP) within the townlands of Dromroe, Sreelane, Newcastle and Castletroy, Co. Limerick.**

**ACP REF. NO.: ACP-323410-25**

The application in respect of the Proposed Limerick City Greenway (UL to NTP) refers.

Please find enclosed our submission in respect of the proposed development, together with the applicable fee of €50.

We would be grateful if the Commission could take the valid comments made in the submission into account in the assessment of the application.

Please direct all correspondence in relation to this file to the address cited below.

Yours faithfully,

Robert Reidy  
Acting Chief Commercial Officer



**COAKLEY O'NEILL**  
town planning

# Planning Submission

**Proposed Limerick City Greenway (UL to NTP)**

Prepared in October 2025 on behalf of

**University of Limerick**

Coakley O'Neill Town Planning Ltd.

 NSC Campus, Mahon, Cork

 021 2307023

 [info@coakleyoneill.ie](mailto:info@coakleyoneill.ie)

 [www.coakleyoneill.ie](http://www.coakleyoneill.ie)

## Document Control Sheet

|                        |                                             |
|------------------------|---------------------------------------------|
| <b>Client</b>          | University of Limerick                      |
| <b>Project Title</b>   | Proposed Limerick City Greenway (UL to NTP) |
| <b>Job No.</b>         | CON25200                                    |
| <b>Document Title</b>  | Planning Submission                         |
| <b>Number of Pages</b> | 15                                          |

| Revision | Status        | Date of Issue                | Authored | Checked | Signed            |
|----------|---------------|------------------------------|----------|---------|-------------------|
| 1        | Draft         | 8 <sup>th</sup> October 2025 | AON      | DC      | <i>Ad O'Neill</i> |
| 2        | Revised Draft | 8 <sup>th</sup> October 2025 | AON      | DC      | <i>Ad O'Neill</i> |
| 3        | Final         | 8 <sup>th</sup> October 2025 | AON      | DC      | <i>Ad O'Neill</i> |

### Confidentiality Statement

*This report has been produced for the exclusive use of the commissioning party and unless otherwise agreed in writing by Coakley O'Neill Town Planning Ltd., no other party may copy, reproduce, distribute, make use of, or rely on the contents of the report. No liability is accepted by Coakley O'Neill Town Planning Ltd. for any use of this report, other than for the purposes for which it was originally prepared and provided. Opinions and information provided in this report, including plates and figures, are on the basis of Coakley O'Neill using due skill, care and diligence in the preparation of same and no explicit warranty is provided as to their accuracy. It should be noted and is expressly stated that no independent verification of any of the documents or information supplied to Coakley O'Neill Town Planning Ltd. has been made.*

Maps reproduced under Ordnance Survey Ireland Licence Number CYAL50492471 © Tailte Éireann – Surveying

## **1.0 INTRODUCTION**

- 1.1 Coakley O'Neill Town Planning Ltd has been retained by the University of Limerick to prepare this planning submission on the proposed Limerick City Greenway (University of Limerick (UL) to National Technology Park (NTP)) submitted by Limerick City and County Council to An Coimisiún Pleanála, ACP Ref. No. ACP-323410-25, under Section 51(A) of the Roads Act, 1993, as amended, on 14<sup>th</sup> August, 2025.
- 1.2 The proposed route of the Limerick City Greenway (UL to NTP) is located along the banks of the River Shannon from the bridge on the River Groody, running along the southern bank of the River Shannon, passing through University of Limerick, and along University Road and McLaughlan Road to Plassey Park Road. Of note in the context of this submission is that, in addition to the National Technology Park (NTP), the proposed Greenway is centred around the University of Limerick (UL) campus grounds.
- 1.3 As a strong advocate of sustainable transport, the University of Limerick is fully supportive of measures that encourage active travel in the City, and, in this respect, endorses the principle of the proposed development.
- 1.4 There are, however, serious concerns about the limited assessment of alternative options, including the alternative of the use of sections of the existing path, to minimise the consequential environmental and amenity impacts on the University's lands.
- 1.5 We set out below our reasoned considerations and would respectfully request the Commission to take these valid comments on board in its assessment of the proposed development.

## **2.0 PROPOSED DEVELOPMENT**

- 2.1 The Limerick City Greenway (UL to NTP) Project will provide strategic, sustainable, and safe connectivity between Limerick city the University of Limerick, and the National Technology Park.
- 2.2 It will be 4.25km long and will consist of a 3.3km long and 3.0-4.0m wide shared path on existing paths or in green fields, and 0.9km of separated 1.8m wide footpaths and 2.0m wide cycle lanes alongside the eastern and western sides of University Road and McLaughlan Road. The proposed Greenway will extend between the River Groody bridge and Plassey Park Road.
- 2.3 The proposed development, the purpose of which is to provide an accessible cycling and walking route for users of all abilities, will form an extension to the already constructed Limerick Smarter Travel, Route 2. The proposed Greenway route will continue from the existing Limerick Smarter Travel, Route 2 west of the River Groody bridge and extend along an existing section of paved and gravel pathway along the River Shannon, providing for access to and from the University of Limerick (UL) and the National Technology Park (NTP) in Castletroy. The proposed Greenway will connect along University Road and McLaughlan Road to Plassey Park Road.

### 3.0 PLANNING SUBMISSION

3.1 The focus of this submission is on the following sections of the proposed route:

- The proposed section to the south of the existing Fisherman Cottages (CH1040-CH1330)
- The proposed section to the west of the Living Bridge (CH1320 to CH2180)
- The proposed section to the east of Kilmurray Village, the Horticulture building, and University Road (CH300\_C-CH677\_C)

#### 3.2 Proposed section to the south of the existing Fisherman Cottages (CH1040-CH1330)



**Plate 1: Proposed section to the south of the existing Fisherman Cottages (CH1040-CH1330)**

- 3.2.1 Plate 1 above is an excerpt of drawing no. PD0011 which illustrates new path, which diverts away from the existing path through an existing wooded area to the south of the existing Fisherman Cottages.
- 3.2.2 Section 6.1.11 of the Planning Application Report states that *the existing path continues north of the existing Fisherman cottages, but the proposed path will turn south-east and run behind the Fisherman Cottages as requested by the residents. This area is characterised by uneven poorly drained ground with thick undergrowth. The residents in the cottages have reported regular flooding in their properties so this project will construct a new flood defence system for the residents.*
- 3.2.3 Section 6.2.8 further states that *The proposed Greenway will turn southeast and will continue south of a collection of fishing huts and cross a section of mixed broadleaved woodland and amenity grassland (approx.*

CH 1050 – CH 1250), and that the trees and hedgerows that will be cut down to clear a path for the proposed Greenway will be replanted to act as a screen between the proposed path and the rear of the Fisherman cottages. It is further stated that the residents in the Fisherman cottages requested LCCC to resolve flooding at the rear of their properties. The proposed earth bund along the east (partially), south, and west (partially) of the properties will prevent flood water from the Plassey Mill Race from entering the rear of the properties. There will be proposed drainage channels on the north and south sides of the elevated Greenway path (refer to Figure 6-98) and surface water will drain towards the existing land drain that discharges to the Plassey Mill Race (refer to drawing RHA-XX-DR-C-PD0011). A proposed flap valve will prevent water from back entering the rear of the Fisherman Cottage properties from the Plassey Mill Race.

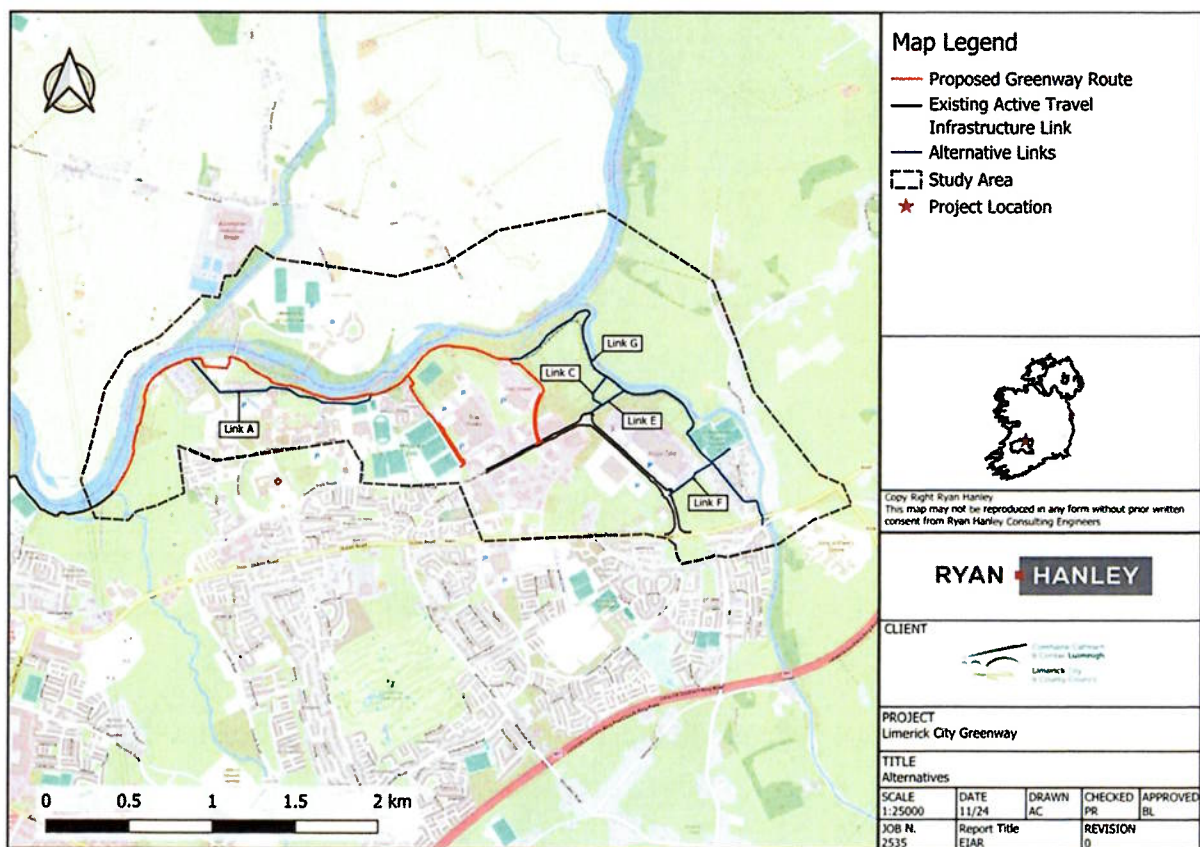


Plate 2: Figure 2.3 of Chapter 2 of the EIAR Part 2

- 3.2.4 It is submitted that the route of the path at this location should be determined on foot of an environmental assessment that is technologically, socially, environmentally, and economically acceptable. In this context, we note Figure 2.3 of Chapter 2 of the EIAR Part 2, excerpt in Plate 3, which illustrates the alternative route options considered.
- 3.2.5 The reasonable alternative of the existing path to the front of the Fisherman Cottages (Plates 3-4) is not assessed. It is noted in section 2.4.2 of Chapter 2 of the EIAR Part 2 that, in accordance with the EU Guidance Document (EU, 2017), *an alternative should not be ruled out simply because it would cause inconvenience or cost to the Developer.*



**Plate 3: Existing path to the front of the Fisherman Cottages**



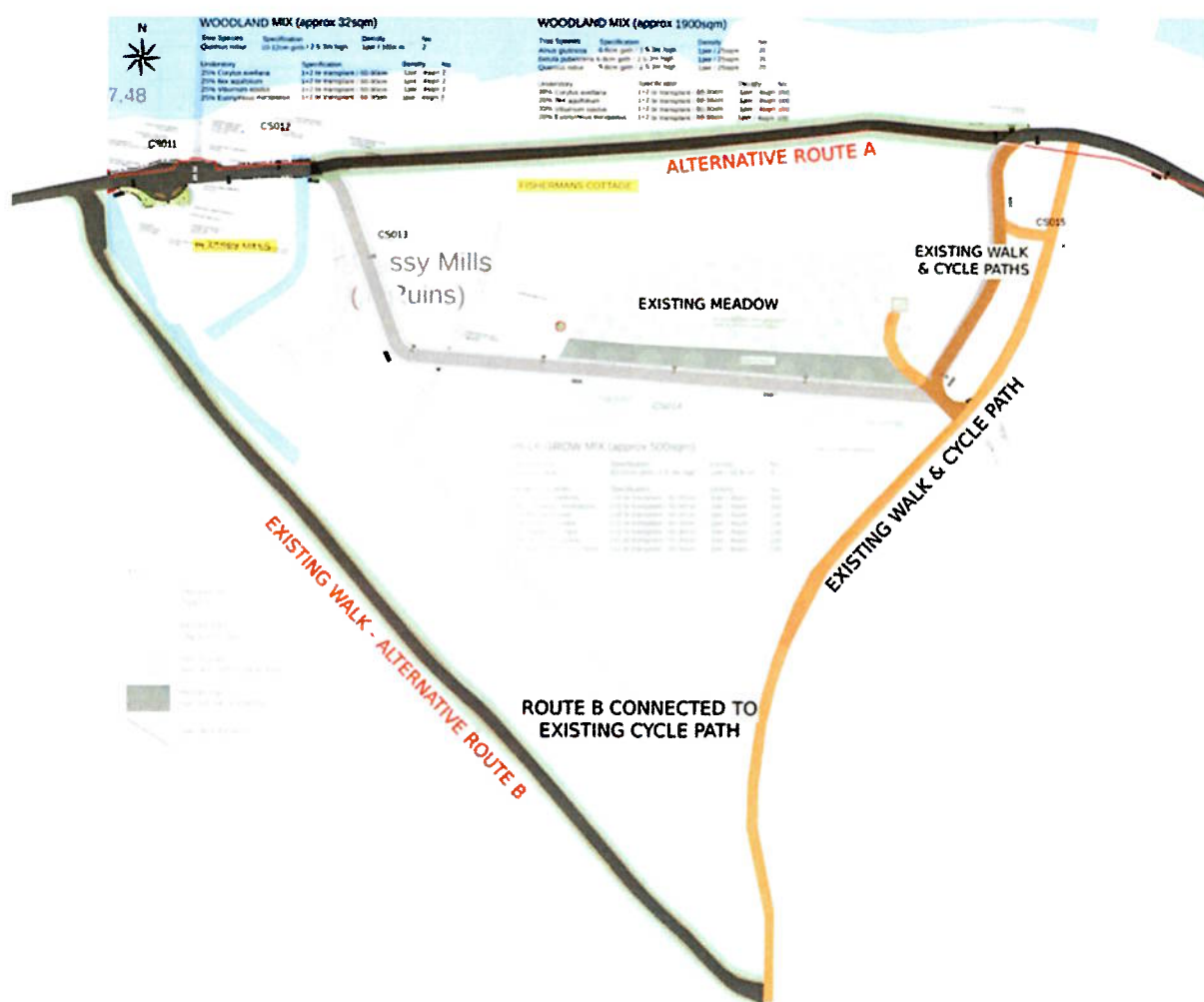
**Plate 4: Existing path to the front of the Fisherman Cottages**

3.2.6 There does not appear to be an environmental reason to rule out the alternative option of using the existing path to the front of the Fisherman Cottages. It is considered that the lack of environmental assessment of this reasonable alternative is a weakness in the application. The removal of existing trees to facilitate the preferred option does not appear to be justified in this context. The provision of replacement planting to compensate for the removal of these trees is also, therefore, not justified. In addition, the proposed greenway bisects a meadow on University land, which is an established amenity area, and contains mature trees. This section of preferred route appears to have a higher potential for environmental impact than the alternative existing route and is therefore not in the interests of the proper planning and sustainable development of the area. In addition, the proposal to instal a berm to address concerns raised by residents of the Fisherman Cottages in relation to flooding can be facilitated in the alternative existing route.

3.2.7 In this context, we respectfully request the Commission to request the applicant to submit revised proposals that either:

- Incorporate the use of the existing route to the front of the Fisherman Cottages for that section of the proposed development (the preferred option from the University's perspective), or
- Incorporate the use of the existing route along the Millstream, connecting back to existing University roads, avoiding the meadow altogether.

Plate 5 below illustrates these alternative options. Plates 6 and 7 depict sections of the existing path along the Millstream.



**Plate 5: Proposed alternative options to avoid unnecessary impact on University lands**

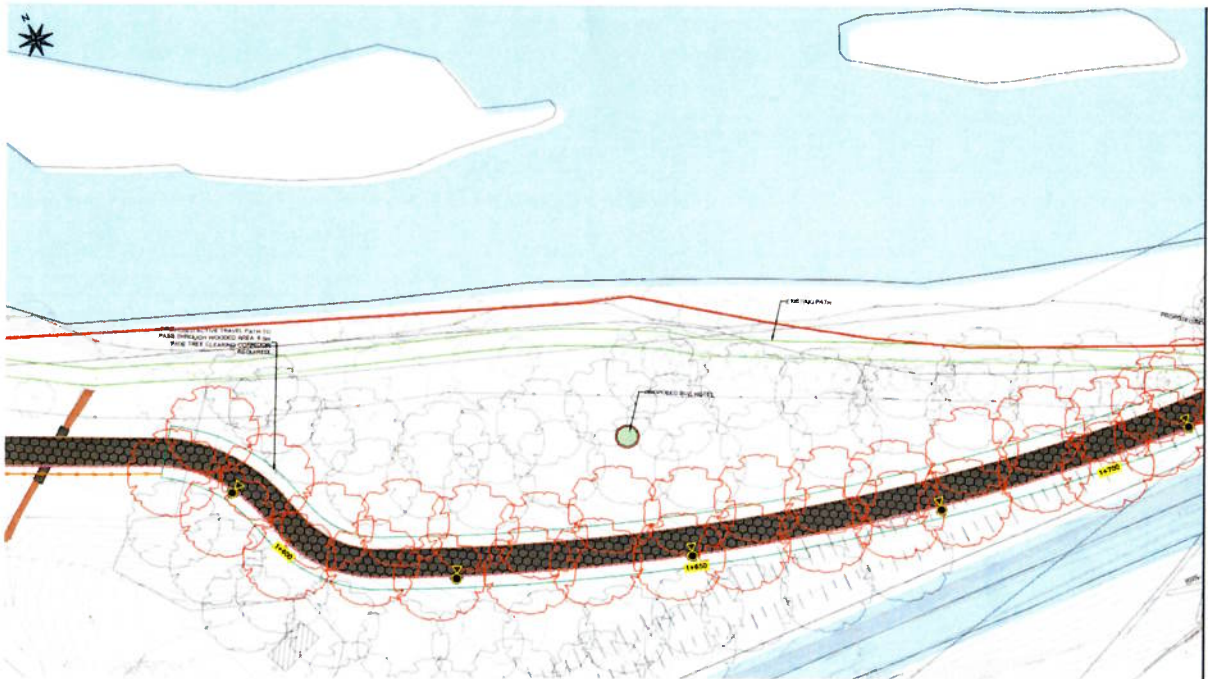


**Plate 6:** Existing path along the Millstream – connection to existing University road



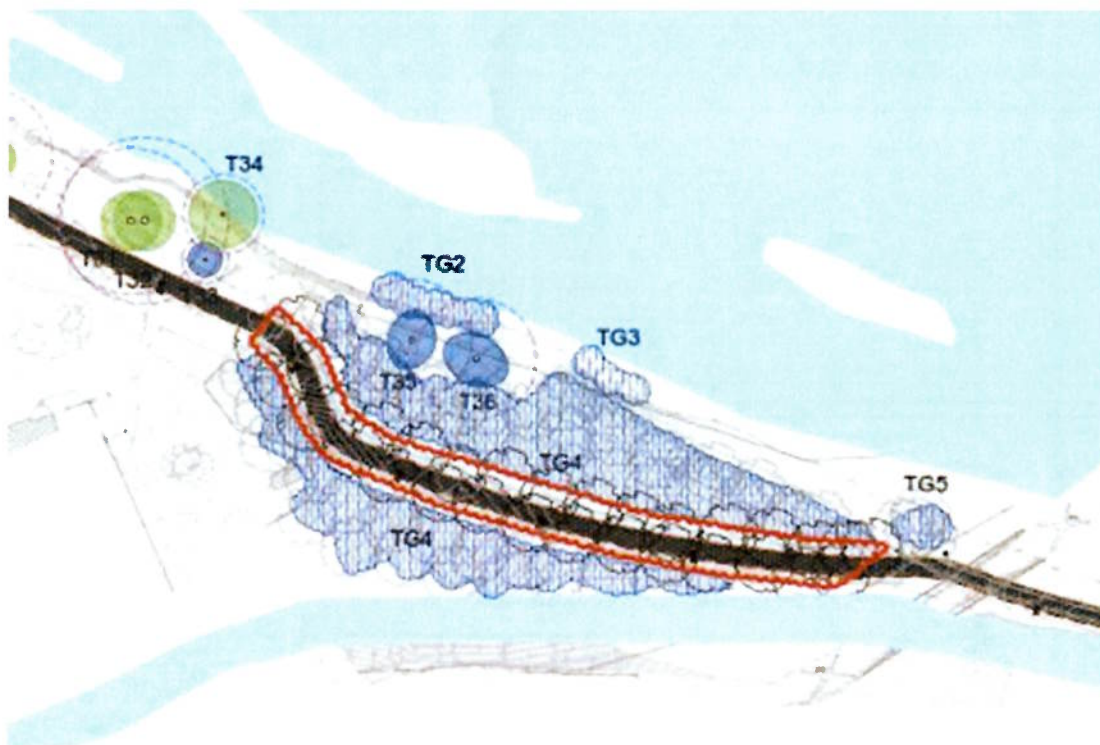
**Plate 7:** Existing path along the Millstream – connection to the existing path to the west of Fisherman Cottages

### 3.3 The proposed section to the west of the Living Bridge (CH1320 to CH2180)



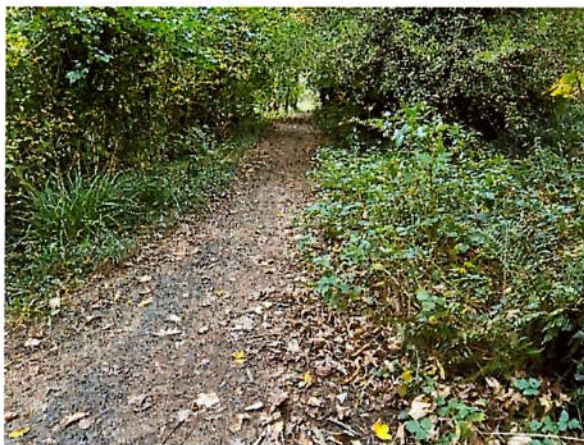
**Plate 8: Proposed greenway section to the west of the Living Bridge (CH1320 to CH2180)**

- 3.3.1 Plate 8 above is an excerpt of drawing no. PD0013 which illustrates the new path to the west of the Living Bridge (CH1320 to CH2180). Section 6.2.9 of the Planning Application Report notes that the proposed Greenway avoids an avenue of mature beech trees in an area of Annex 1 Alluvial Woodland along the riverbank by diverting south of the existing gravel path (@ CH1420) to immature Birch trees where a 6m wide avenue of tree clearance will be required to construct the proposed Greenway.
- 3.3.2 However, the trees to be removed, of which there is a significant quantum, have been characterised as being of moderate quality by the project Arborist, i.e., they represent *'Trees present in numbers, usually growing as groups or woodlands, such that they attract a higher collective rating than they might as individuals; or trees occurring as collectives but situated so as to make little visual contribution to the wider locality'*. Figure 6-102 of the Planning Application Report, excerpt in Plate 9 below, illustrates the area of moderate quality trees to be removed.
- 3.3.3 The removal of existing trees to facilitate the preferred option does not appear to be justified in this context. No alternative that avoids the removal of these mature trees is presented in the alternatives assessment. The environmental benefit of this section of the preferred route relative to the loss of this quantum of trees, and the potential impact on the survival of the overall group of trees, is questionable.

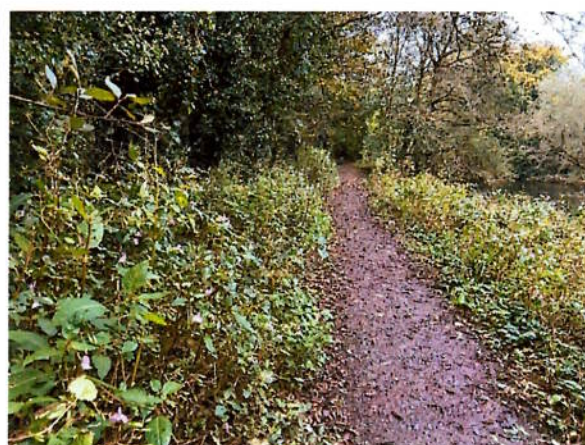


**Plate 9: Excerpt of Figure 6-102 of the Planning Application Report**

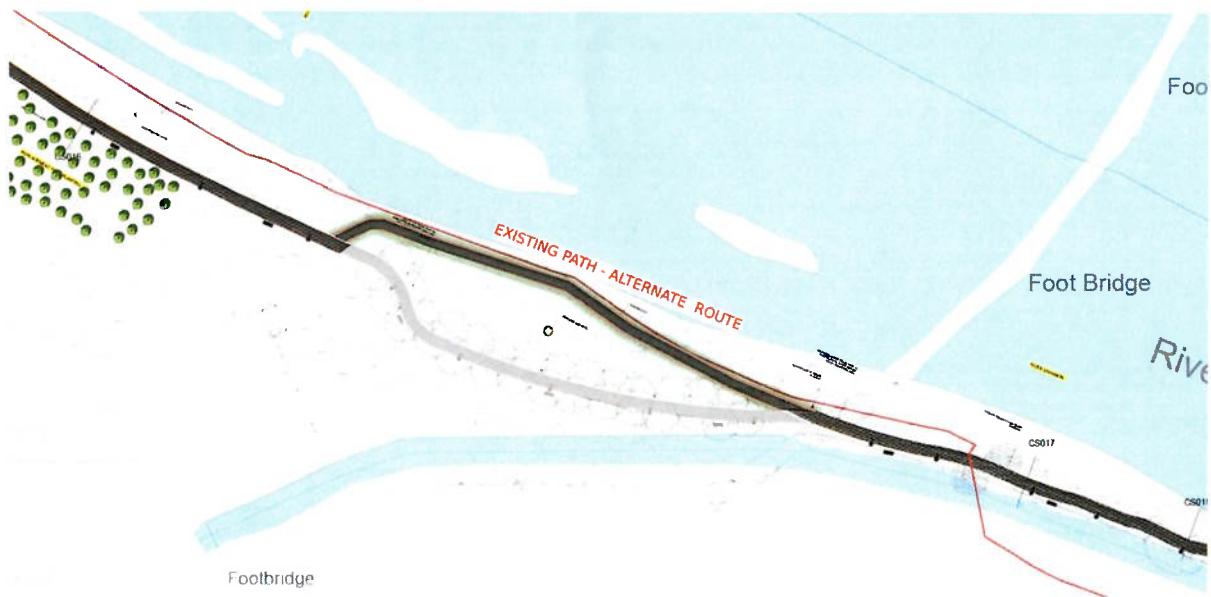
- 3.3.4 In this context, we respectfully request the Commission to ask the applicant to submit revised proposals for the section of the proposed development to the west of the Living Bridge that utilises the existing path (Plates 10-11), with a modified route closer to the riverfront that mitigates any impact on the existing Alluvial Woodland, as presented in Plate 12 below:



**Plate 10: Existing path**



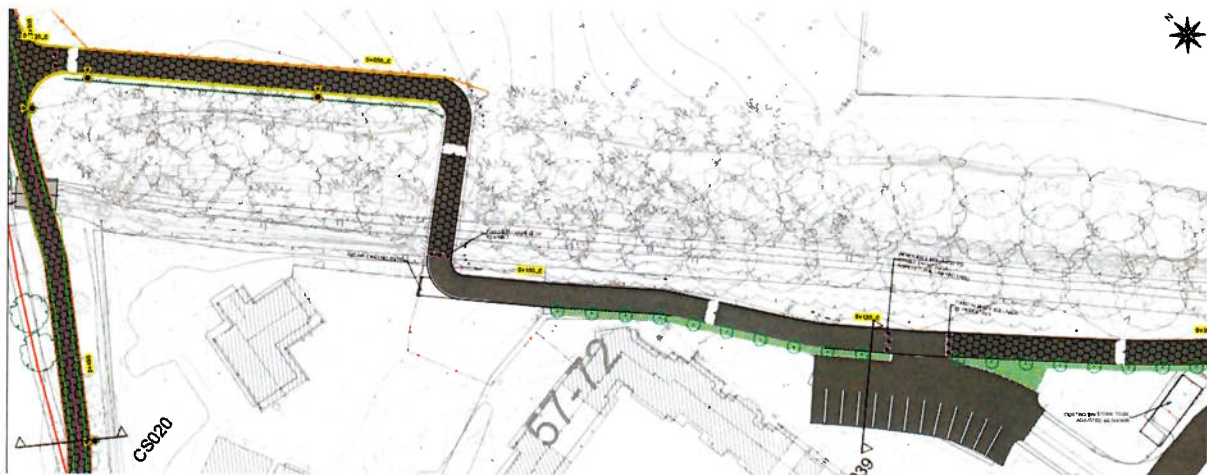
**Plate 11: Existing path**



**Plate 12: Proposed alternative option to avoid unnecessary removal of a large quantum of existing trees**

### 3.4 The proposed section to the east of Kilmurray Village, the Horticulture building and University Road (CH300\_C-CH677\_C)

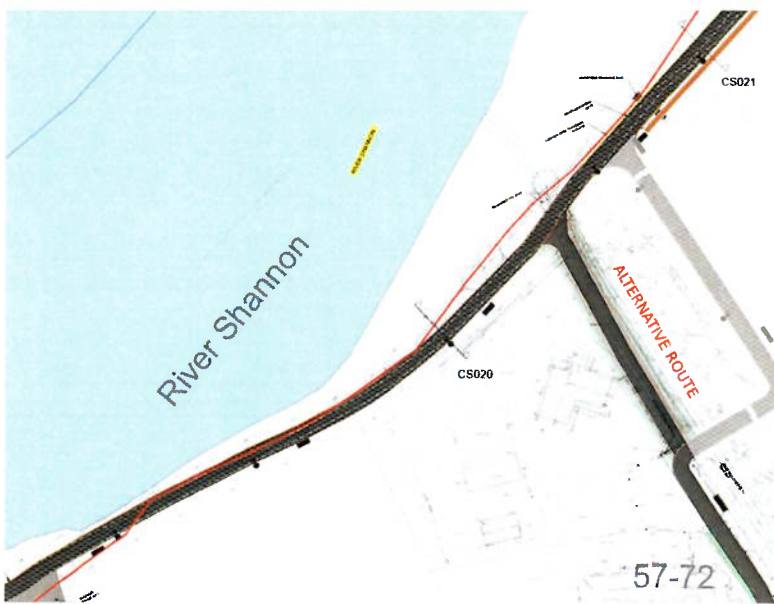
3.4.1 As illustrated in Plate 13, the proposed greenway route as it traverses University Road veers off to the south-east of the UL Horticultural building via an existing access route through an existing wooded area before joining the existing path to the north.



**Plate 13: Proposed greenway section to the east of Kilmurray Village, the Horticulture building and University Road (CH300\_C-CH677\_C)**



3.4.3 In this context, we respectfully request the Commission to ask the applicant to submit revised proposals for the section of the proposed development to the east of Kilmurray Village, the Horticulture building and University Road, with a modified route that continues straight along University Road to connect to the existing path to the north, as presented in Plate 15 below:



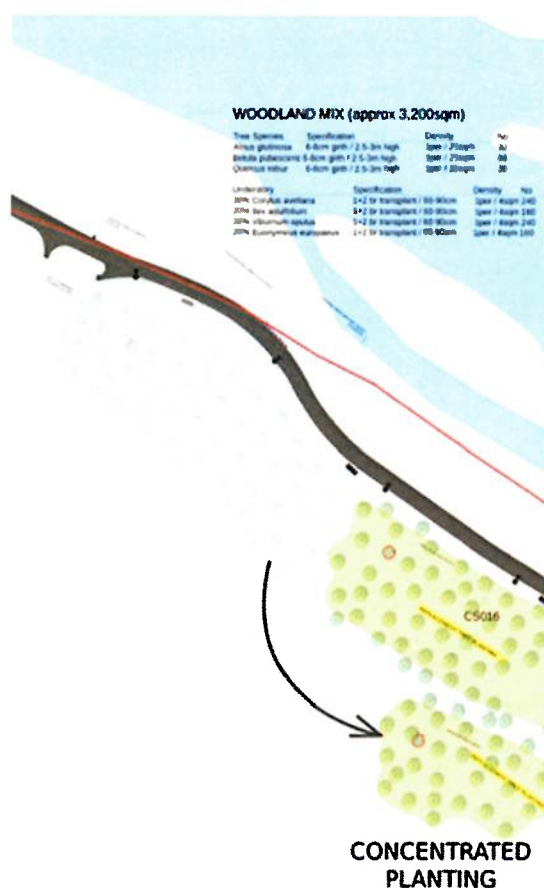
**Plate 15: Proposed alternative section of the proposed Greenway to the east of Kilmurray Village, the Horticulture building and University Road**



**Plate 16: Proposed alternative section of the proposed Greenway to the east of Kilmurray Village, the Horticulture building and University Road**

### 3.5 Loss of trees and impact on University lands

- 3.5.1 There is an overriding concern about the quantum of trees to be removed to facilitate the proposed development. The Tree Survey Report include in the Appendices of the EIAR (Part 3) notes that a total of 85no. trees are to be removed, of which 82no. (96.5%) are class B trees of moderate quality.
- 3.5.2 The scale of compensatory tree planting is noted, however, the environmental effect of removing such a large quantum of good quality trees to facilitate the proposed development relative to its overall benefits requires consideration as a matter of principle.



3.5.3 The locations of some of the areas of compensatory planting, for example to the front of Dromroe Student Village, has a negative visual effect on the existing open character and amenities of the area, noting that this area falls within the Castletroy, Dromore Architectural Conservation Area (ACA 9) for which views out from the University's principal buildings are to be safeguarded as per objective 2.9b) of Volume 3 of the Limerick Development Plan 2022-2028, and therefore requires further consideration. In the first instance, however, a fundamental review of the preferred route to reduce the quantum of existing tree removal and avoid the need for large areas of new planting in a somewhat haphazard manner is required.

3.5.4 We respectfully request the Commission to ask the applicant to review the quantum of tree loss and associated compensatory tree planting, and, in the instance of the area to the front of Dromroe Student Village, to reduce the scale of planting, or position the proposed planting further east to avoid any impact on the visual amenities of the area, as suggested in Plate 17.

Plate 17: Proposed revised planting regime to the north of Dromroe

## 4.0 CONCLUSION

- 4.1 In conclusion, we reiterate the University of Limerick's support for the proposed Greenway. However, it is considered that there are more appropriate alternatives to the route of the proposed Greenway that would achieve better environmental outcomes.
- 4.2 In this respect,
- As regards the proposed section to the south of the existing Fisherman Cottages (CH1040-CH1330), we respectfully request the Commission to request the applicant to submit revised proposals that either:
    - Incorporate the use of the existing route to the front of the Fisherman Cottages for that section of the proposed development (the preferred option from the University's perspective), or
    - Incorporate the use of the existing route along the Millstream, connecting back to existing University roads, avoiding the meadow altogether.
  - As regards the proposed section to the west of the Living Bridge (CH1320 to CH2180), we respectfully request the Commission to ask the applicant to submit revised proposals for the section of the proposed development to the west of the Living Bridge that utilises the existing path, with a modified route closer to the riverfront that mitigates any impact on the existing Alluvial Woodland.
  - As regards the proposed section to the east of Kilmurray Village, the Horticulture building, and University Road (CH300\_C-CH677\_C), we respectfully request the Commission to ask the applicant to submit revised proposals for the section of the proposed development to the east of Kilmurray Village, the Horticulture building and University Road, with a modified route that continues straight along University Road to connect to the existing path to the north.
- 4.3 In addition, we respectfully request the Commission to ask the applicant to review the quantum of tree loss and associated compensatory tree planting, and, in the instance of the area to the front of Dromroe Student Village, to reduce the scale of planting or position the proposed planning further east to avoid any impact on the visual amenities of the area, having regard to its location within the Castletroy, Dromore Architectural Conservation Area (ACA 9).
- 4.4 We would respectfully request the Commission to take these valid comments on board in its assessment of the proposed development to minimise the consequential environmental and amenity impacts on the University's lands.