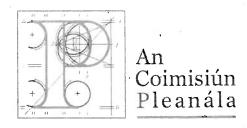
Our Case Number: ACP-323410-25



An Taisce c/o Seán Mcilfatrick 2 inglewood villas Thomandgate V94 DYW2

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 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.

I acknowledge receipt of the payment of €50 which accompanied your submission. Please be advised that a prescribed body is exempt from paying a fee, therefore, a refund of €50.00 will be issued to the debit/credit card used to make this payment.

If you have any queries in relation to this matter please contact the undersigned officer of the Commission at <a href="mailto:laps@pleanala.ie">laps@pleanala.ie</a>

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

Yours faithfully,

**B**reda Ingle

**Executive Officer** 

Direct Line: 01-8737291

**HA03** 

Email

## AN TAISCE LIMERICK

## Environment | Heritage | Advocacy

Submission on Case no. 323410

An Coimisiún Pleanála reference HA91-323410

An Taisce Limerick is the local branch of the national organisation An Taisce working towards an Ireland where our environment, natural and built, is actively prioritised and a lasting legacy of sustainability and resilience is ensured. We aim to advocate on behalf of present and future generations on the important choices we must make in search of a more sustainable future. We rely on the best available science, promote inclusion and community participation at all levels.

An Taisce Limerick welcomes the opportunity to make the following observations.

While recognizing the importance of Active travel schemes to promote modal shift and create better environments for pedestrians and cycling along with the benefits to health and wellbeing these interventions can have, it must be balanced with protecting our natural environment.

In relation to the riverbank walkway from Lock Quay to the confluence of the Mulcair river / shannon River An Taisce Limerick are deeply concerned at the removal of 60 mature trees in a pristine long established amenity of great natural beauty The Lady Maunsell walk dating to the late 18th century is a well established walk enjoyed by many locals and visitors, the removal of these trees will cause the destruction of a vital habitat for wildlife and fauna.

The destruction of this habitat is acknowledged in the summary of the EIAR report, the mitigating measures with sets out Limerick city and county councils tree policy of planting 5 trees for every one tree that is cut down is in our opinion now outdated in light of the EU Restoration Law which Ireland is a signatory to and has legally binding commitments which states that there should be no loss of our urban tree canopy by 2030, The EIAR report does not take into consideration this law.

The cutting down of 60 mature trees that are now providing their peak potential for carbon sequestering will be wiped out with replacement trees needing 3 decades to provide this level of carbon sequestering.

It is well documented that Ireland's bird species is in a dramatically perilous condition with 63% of regularly occurring bird species in trouble. Ireland faces one of the starkest loss of habitats in Europe with the lowest tree canopy in Europe along with the likelihood of Ireland failing to meet its own goals for "good water status" by 2027 it is of concern that the removal of the 60 mature trees will have grave consequences for the structural stability of the walkway with risks for water quality .

The introduction of a tarmac surface along this route and its proximity to the Mulcair river within the catchment area of the river Shannon SAC which is protected under the EU habitats directive raises concerns about run off from a non permeable surface, greater considerations should be given to permeable surfaces in proximity to rivers and water courses.

There is not enough scientific data to determine the environmental damage that may be caused by the run off from toxic pollutants contained within tarmac ,the mix of toxic chemicals including formaldehyde and numerous toxic binding agents .

An Taisce Limerick believes that current recently upgraded active travel measures on plassey and improvements to other routes within UL and National Technological park would provide a more balanced approach ensuring the protection of an alluvial woodland, a valuable amenity and established habitat.

A defining legacy of this generation will be how we manage, protect and restore our natural environment. This shared endeavour falls to each and everyone one of us to consider each decision we make in that context.

Seán Mc ilfatrick Chairperson An Tasice Limerick

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