

Ballinlee Green Energy Ltd.

Chapter 6 Biodiversity

Appendix 6H: Biodiversity Actions and Objectives for County Limerick

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COMMERCIAL IN CONFIDENCE

APPENDIX 6H: LIMERICK CITY & COUNTY COUNCIL BIODIVERSITY OBJECTIVES (SOURCE: LIMERICK DEVELOPMENT PLAN 2022-2028)

Table 1: Limerick Development Plan 2022-2028 Biodiversity Policies and Objectives

Policy /Objective	Description of Policy	Project Compliance
Biodiversity and Landscape Policies		
<i>Environment, Heritage, Landscape and Green Infrastructure</i>		
EH P1	Protection of Natural Heritage and Biodiversity It is a policy of the Council to: a) Protect and conserve Limerick's natural heritage and biodiversity, in particular, areas designated as part of the European Sites Natura 2000 network, such as Special Protection Areas (SPAs) and Special Areas of Conservations (SACs), in accordance with relevant EU Directives and national legislation and guidelines. b) Maintain the conservation value of all Natural Heritage Areas and proposed Natural Heritage Areas (pNHAs) for the benefit of existing and future generations.	✓
EH P2	Sustainable Management and Conservation It is a policy of the Council to sustainable management and conservation of areas of natural environmental and geological value within Limerick and to protect, enhance, create and connect, where ecologically suitable, natural heritage, green spaces and high-quality amenity areas for the benefit of biodiversity.	✓
EH P3	Climate Action and the Natural Environment It is a policy of the Council to take into account the contents of the National Biodiversity Action Plan and the Biodiversity Climate Adaptation Plan and any forthcoming guidance or legislation on climate action, whether adaptation or mitigation that will emerge during the course of the Plan.	✓
EH P4	Compliance with Limerick's Heritage Plan It is a policy of the Council to place ecological and environmental issues at the centre of planning policies and decisions and in doing so, will adhere to the objectives set out in Limerick's Heritage Plan 2017-2030.	✓
<i>Waterways, Lakes and Wetland Landscapes, Air Quality, Noise</i>		
EH P6	Water and Air Quality It is a policy of the Council to ensure that water and air quality shall be of the highest standard, to ensure the long term economic, social and environmental well-being of Limerick's resources. The World Health Organisation Air Quality Guidelines will be the basis for the air quality guidance in Limerick.	✓

Policy /Objective	Description of Policy	Project Compliance
Biodiversity and Landscape Objectives		
<i>Protected Sites and Species</i>		
EH O1	Designated Sites and Habitats Directive It is an objective of the Council to ensure that projects/plans likely to have significant effects on European Sites (either individually or in combination with other plans or projects) are subject to an appropriate assessment and will not be permitted under the Plan unless they comply with Article 6 of the Habitats Directive. The Council, will through the planning enforcement process where applicable, seek to restore the ecological functions of designated sites, where they have been damaged through inappropriate development.	✓
EH O2	Lesser Horseshoe Bat It is an objective of the Council to require all developments in areas where there may be Lesser Horseshoe Bats, to submit an ecological assessment of the effects of the development on the species. The assessment shall include mitigation measures to ensure that feeding, roosting or hibernation sites for the species are maintained. The assessment shall also include measures to ensure that landscape features are retained and that the development itself will not cause a barrier or deterrent effect on the species.	✓
<i>Conservation outside Protected Sites</i>		
EH O3	Ecological Impact Assessment It is an objective of the Council to require all developments where there are species of conservation concern, to submit an ecological assessment of the effects of the development on the site and nearby designated sites, suggesting appropriate mitigation measures and establishing, in particular, the presence or absence of the following species: Otter, badger, bats, lamprey and protected plant species such as the Triangular Club Rush, Opposite Leaved Pond Weed and Flora Protection Order Species generally.	✓
EH O4	Creation of New Habitats It is an objective of the Council to: a) Seek the creation of new habitats by encouraging wild green areas and new water features such as, pools and ponds in new developments. b) Encourage management plans for green areas to use the minimum of pesticides and herbicides.	✓
EH O5	New Infrastructure Projects It is an objective of the Council to require new infrastructure and linear developments in particular, to demonstrate at design stage sufficient measures to assist in the conservation of and dispersal of species and to demonstrate a high degree of permeability for wildlife, to allow the movement of species and to prevent the creation of barriers to wildlife and aquatic life in the wider countryside.	✓
EH O8	Roosting Habitats	✓

Policy /Objective	Description of Policy	Project Compliance
	It is an objective of the Council to require the provision of alternative roosting or settlement facilities for species, such as bird or bat boxes, swift boxes, artificial holts (for otters), or other artificially created habitats in proposed developments, where considered appropriate.	
Trees, Forestry and Hedgerows		
EH O10	Trees and Hedgerows It is an objective of the Council to: a) Retain and protect amenity and biodiversity value of the County and City by preserving as far as possible trees, woodlands and hedgerows, having regard to the significant role that trees and hedgerows play in local ecology, climate change and air quality and their contribution to quality place making and the associated health and wellbeing benefits. b) Require, in the event that mature trees or extensive mature hedgerow is proposed to be removed, that a comprehensive tree and hedgerow survey be carried out by a suitably qualified tree specialist to assess the condition, ecological and amenity value of the tree stock/ hedgerow proposed for removal and to include mitigation planting and a management scheme. The Council will seek in all cases to ensure when undertaking development, or when permitting development, that the loss of, or damage to, existing trees is minimised. c) Require the planting of native trees, hedgerows and vegetation and the creation of new habitats in all new developments and public realm projects. The Council will avail of tree planting schemes administered by the Forest Service, in ecologically suitable locations, where this is considered desirable. d) To identify and prepare TPO's where trees of exceptional amenity, cultural or environmental value are identified which warrant a high level of protection. e) To implement the Limerick City and County Tree Policy when completed and review as appropriate.	✓
Blue and Green Infrastructure Strategy		
EH O12	Blue and Green Infrastructure It is an objective of the Council to: a) Promote a network of blue and green infrastructure throughout Limerick. b) Promote connecting corridors for the movement of species and encourage the retention and creation of features of biodiversity value, ecological corridors and networks that connect areas of high conservation value such as woodlands, hedgerows, earth banks, watercourses, wetlands and designated sites. In this regard, new infrastructural projects and linear developments in particular, will have to demonstrate at design stage, sufficient measures to assist in the conservation of and dispersal of species. Projects which would be detrimental to existing blue and green infrastructure features will not be permitted. c) Ensure the integration and strengthening of green infrastructure into the preparation of Local Area Plans. d) Where possible remove barriers to species movement, such as the removal of in-stream barriers to fish passage for example. e) Seek to advance the use of an ecosystem services approach and ecosystem services valuation as a decision-making tool in plans and projects, subject to appropriate ecological assessment.	✓

Policy /Objective	Description of Policy	Project Compliance
EH O14	Nature Based Solutions It is an objective of the Council to increase the use of Nature Based Solutions (NBS) throughout Limerick.	✓
All Ireland Pollinator Plan		
EH O7	All Ireland Pollinator Plan It is an objective of the Council to: a) Continue to actively support the aims and objectives of the All-Ireland Pollinator Plan 2021 – 2025, by encouraging measures to protect and increase the population of bees and other pollinating insects in Limerick. b) Support the aims of the National Bio-Diversity Action Plan and succeeding plans, in emphasising the importance of ecological issues in planning.	✓
Invasive Species		
EH O11	Invasive Species It is an objective of the Council to: a) Work with and facilitate the work of agencies addressing the issue of terrestrial and aquatic invasive alien species (IAS), by implementing biosecurity measures, selected control measures and surveys, where appropriate. b) Address the presence of invasive alien species on derelict sites under the provisions of the Derelict Sites Act through the preparation of a management and eradication plan for these species. c) Require the submission of a control and management program for the particular invasive species as part of the planning process, if developments are proposed on sites where invasive species are present. d) Employ biosecurity measures to prevent the spread of invasive alien species and disease and to insist that all such measures are employed on all development sites.	✓
Ground Water, Surface Water Protection and River Basin Management Plans		
EH O15	Ground Water, Surface Water Protection and River Basin Management Plans It is an objective of the Council to: a) Protect ground and surface water resources and to take into account the requirement of the Water Framework Directive when dealing with planning and land use issues. b) Implement the provisions of the River Basin Management Plan 2022 – 2028 and any succeeding plan. The filling of wetlands, surface water features and modifications and drainage of peatlands shall generally be prohibited. c) Implement the measures put forward in the Limerick Groundwater Protection Plan, in assessing planning applications and their consequences for ground water. d) The Blue Dot Catchments programme is a key action under the River Basin Management Plan for Ireland 2022-2028. The aim of the programme is to protect and restore high ecological status to a network of rivers and water bodies in Limerick. In Limerick, the following rivers and water bodies are Blue Dot Catchments, Bleach Lough, the Ogeen River and the Behanagh River. The Council will	✓

Policy /Objective	Description of Policy	Project Compliance
	take a precautionary approach to development which might affect water quality in these areas in line with requirements of the Water Framework Directive.	
EH O17	Water Quality It is an objective of the Council to support commitments to achieve and maintain 'At Least Good' status, except where more stringent obligations are required. There shall be no deterioration of status for all water bodies under the Marine Strategy Framework Directive and its programme of measures, the Water Framework Directive and the River Basin Management Plan. Key challenges include, inter alia, the need to address significant deficits in urban waste-water treatment and water supply, addressing flooding and increased flood risks from extreme weather events and increased intense rainfall because of climate change.	✓
EH O18	Riparian Buffers It is an objective of the Council to maintain riverbank vegetation along watercourses and ensure protection of a 20m riparian buffer zone on greenfield sites and sites are maintained free from development. Proposals shall have cognisance of the contents of the Inland Fisheries Ireland document Planning for Watercourses in Urban Environments.	✓
Light Pollution		
EH O24	Light Pollution It is an objective of the Council to ensure that the design of external lighting schemes minimise the incidence of light spillage or pollution in the immediate surrounding environment. In this regard, developers shall submit lighting elements as part of any design, with an emphasis on ensuring that any lighting is carefully directed, not excessive for its purpose and avoids light spill outside the development and where necessary will be wildlife friendly in design.	✓

Table 2: Limerick Biodiversity Action Plan 2025-2030 Objectives and Actions

Action Code	Description of Action	Target/Measure of Success	Responsible Body	Resources
Table B. Meet Urgent Conservation and Restoration Needs				
15	Promote native/local provenance for trees, shrubs plants etc. and LCCC to include this as a criteria for procurement	No. of promotions and no. of trees/ plants procured annually	LCCC in collaboration with others	-
18	Promote the prevention of fragmentation of ecological corridors including hedgerows and riverine features	Regular capacity building and awareness initiatives will be undertaken	LCCC planning team	-
Table C. Secure Nature's Contribution to Current and Future Generations				
1	Protect and enhance Biodiversity on all developments in Limerick including new, existing and refurbished developments along with Greenways and all infrastructural developments	New measures introduced to be highlighted in new developments and progress implementation of the Greenway Biodiversity Action Plan	LCCC Greenway Team and LCCC and contractors and Franchises	LCC own resources
3	In line with LCCC Tree Policy increase the planting of suitable trees and hedgerows of local provenance	No. of trees, hedgerows to be planted in urban, town and village areas (ensure right tree right place)	LCCC and developers	LCCC own resources and part of overall project development
Table D. Enhance the Evidence Base for Action on Biodiversity				
8	Resurvey Limerick County Barn Owls, Swifts and Bat Roosts include desktop surveys for ground truthing.	No. of surveys that will be participated in.	LCCC in Collaboration with BirdWatch Ireland /landowners	85% NPWS LBAF15% LCCC own resources
Table E. Strengthen Limerick's Contribution to National and Regional Biodiversity Initiatives				
2	Develop integrated programme to address Invasive Alien Species including a) mapping, b) management protocol for public lands and c) guidelines for private lands and d) targeted education workshops.	Species map to be developed. Protocol & guidelines will be developed. A minimum of 1 invasive workshop per annum will be carried out along with 4 x toolbox talks	LCCC in collaboration with relevant stakeholders	85% NPWS LBAF 15% LCCC own resources
3	Continue to collaborate on Lesser Horseshoe Bat's national group and regional group.	Number of LHB meetings that are attended annually	LCCC, NPWS, BCI and other stakeholders	85% NPWS LBAF 15% LCCC own resources

Action Code	Description of Action	Target/Measure of Success	Responsible Body	Resources
4	Engage with Inland Fisheries Ireland, Electricity Supply Board, Office of Public Works and other stakeholders to reverse decline in riparian and riverine habitat which is home to many annex species such as Atlantic salmon, sea lamprey etc, including the removal and mitigation of barriers to fish movement in our rivers.	Develop working relationship with all and report on the number of Meetings held annually	LCCC in collaboration with stakeholders	LCCC own resources
7	Promote the protection of hedgerows and other trees which contribute to green infrastructure	Min of 2 training sessions to be held annually. Educational guidance leaflet which includes case studies to be produced	LCCC in collaboration with landowners and other relevant organisations	85% NPWS LBAF 15% LCCC own resources
10	Promote and enhance habitat for species scarce to Limerick where appropriate	Efforts will continue towards the ongoing protection of nationally scarce and species scarce to Limerick.	LCCC in collaboration with relevant stakeholders	LCCC own resources