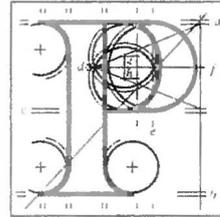


**Our Case Number:** ACP-323849-25



**An  
Coimisiún  
Pleanála**

Irish Wildlife Trust (Limerick Branch)  
c/o Michael Quirke  
1 Cois na Coille  
Murroe  
Co. Limerick

**Date:** 16 January 2026

**Re:** The proposed development is for a mixed use development that seeks the regeneration and adaptive reuse of a strategic brownfield site, as part of the Limerick City and County Council 'World Class Waterfront revitalisation and transformation project' 'Cleaves Riverside Quarter' in the townland of Farranshone More in Limerick City.

Dear Sir / Madam,

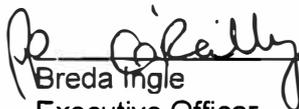
An Coimisiún Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

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

If you have any queries in relation to the matter please do not hesitate to 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

JA02

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:communications@pleanala.ie">communications@pleanala.ie</a>

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

To: An Coimisiun Pleanala,  
64, Marlborough Street, Dublin

An Observation on Cleeves Riverside Quarter, Limerick.

Case Reference 323849

From: Limerick Branch, Irish Wildlife Trust.

Contact details:

Michael Quirke.

1, Cois na Coille,

Murroe,

Co. Limerick.

[Mikequirke23@gmail.com](mailto:Mikequirke23@gmail.com)

089 2167153

16<sup>th</sup> December 2025.

## 1. The Limerick branch of the IWT

The Irish Wildlife Trust (IWT) is a registered charity dedicated to protection and restoration of Ireland's biodiversity by motivating and supporting people to take action for nature ([www.iwt.ie](http://www.iwt.ie)).

The Limerick branch of the IWT was established in 2021. One of our aims is to provide scientific advice for nature conservation in Limerick. The branch is represented on the Biodiversity Forum for Limerick City and County Council, and is involved with other conservation bodies.

Another aim is to support the public in developing their skills in identification of Limerick's flora (and fauna), and in recording it with the NBDC. Its committee includes a number of botanists, some of whom are members of the Botanical Society of Britain and Ireland (BSBI).

The branch has a FaceBook page for Limerick Wild Plants enthusiasts, where they share observations and comments. Our brief extends over the county of Limerick, but it has held a number of field activities specifically in the City. For instance, it has held an annual walk in the spring on King's Island to showcase one of Limerick's botanical specialities, the Summer Snowflake, *Leucojum aestivum*, as well as other plants in flower at that time. This summer it held a walk from Cleeves to the railway station, to specifically look at six plant species, not native to Limerick, including the Maidenhair Fern, *Adiantum capillus-veneris*. The dispersal and naturalisation of 'alien' plant species within the country is of significant interest to botanists.

We are confining our observations on this development to its flora, as there exists in Limerick a branch of BirdWatch Ireland, and a bat conservation group.

Our main concern with this project is the conservation of Maidenhair Fern. We find that the EIAR is somewhat deficient in recording its presence at the site, in identifying its significance, and in proposing mitigating measures to enable the plant to continue as a developing part of Limerick's flora.

## 2. Maidenhair Fern

Maidenhair Fern, *Adiantum capillus-veneris*, is a native plant which is 'locally frequent in the Aran Islands and the Burren and very rare elsewhere and there often an introduction' (An Irish Flora, 2012). It is also native to Sligo and Donegal, Isle of Man, south Wales and south-west England. It has a world-wide distribution, and in Europe it is considered Mediterranean-Atlantic in its biogeography (Plant Atlas 2020).

Its natural habitat is rock-crevices and damp rock-faces, on calcicole or base-enriched sites, but it has, through natural dispersal, spread to a small number of man-made structures, such as walls, in Britain and Ireland.

As well as the native sites mentioned above, it has extended its range in Ireland and has established itself in a few locations. There is a long-established population at Skibbereen (Wildflowers of Cork City and County, 2009), which O'Mahony describes as 'a very welcome and graceful adornment to the Cork flora'. Praeger, in 1939, reported it on a wall at Crom Castle in Fermanagh, and it was also at Florencecourt, and these are the only known sites in Northern Ireland (<http://fermanagh.bsbi.org>). More recently it has been found in a small number of other locations, such as Cobh and Roscrea. See attached distribution map from the BSBI.

The first record for Maidenhair Fern in Limerick is for Adare in 1997 (Flora of County Limerick, 2013), on the walls of a restored friary, but in more recent years it has established itself at O'Callaghans Strand and North Circular Road, which are part of the Cleeves' site. This habitat mimics its natural habitat of rock-crevices and damp rock-faces, on limestone or base-enriched sites. In addition to the presence of a suitable substrate, proximity to the River Shannon and its moderating effect on temperature and moisture deficits may have encouraged establishment of the Cleeves population.

A similar species, *Adiantum raddianum*, native to America and Africa, is for sale in Limerick, but it is distinguished from *A. capillus-veneris* by its horseshoe-shaped sori (Stace, 2019), and though it has established itself in a few places in England it has not been found in Limerick, or in any part of Ireland.

Maidenhair Fern is thus more than of local interest, but of County or National Interest to botanists. In fact, the Cleeve's site seems to have the largest population in Ireland.

### 3. Mitigation from effects in the development

The EIAR states that the fern was 'confirmed to be present' on the southern and eastern boundary walls in multiple pockets' - these are the street-facing walls on O'Callaghan Strand and the North Circular Road.

Unfortunately, this is its only record of the fern on the site, and from this it appears that the site was not thoroughly examined. On a site visit on 16<sup>th</sup> June 2022 by members of the Limerick IWT it was also observed growing on the south-facing wall of the flaxmill building, in the joints between the blocks (see attached photo). There were numerous colonies of the plant. In addition it was noted to be present on the internal side of the O'Callaghan Strand wall.

Our concerns for the Maidenhair Fern are centred on these two areas – the boundary walls and the flaxmill wall.

The development proposes to lower the boundary wall on O'Callaghan Strand to 450mm, and this will seriously deplete, if not entirely remove, the Maidenhair Fern from the O'Callaghan Strand wall. It is also proposed to stabilise the walls on the North Circular Road, following works to facilitate raising the level of the road.

As no observations of the Maidenhair Fern on the flaxmill wall has been presented in the EIAR it follows that no mitigation measures have been proposed.

We would recommend that these old walls should not be repointed (unless absolutely necessary for safety reasons) to avoid removing any of the plants which have naturally colonised them.

In this regard, we are guided by an article by the Dublin Naturalists Field Club in Irish Botanical News (No. 34), *Protecting the threatened flora of old walls*. The question to be considered in terms of the impact of any proposed action on the walls is 'is it purely cosmetic – tidying for the sake of tidiness'?

Old walls in towns and cities are important features in terms of both their heritage value and their value as a habitat. They are often the last refuge for rarer plant species to occur in an otherwise highly modified environment. They provide a contribution to ecological connectivity, especially when they interact with other landscape elements such as hedges and water bodies. They are also a haven for lichen and bryophyte communities as well as invertebrates (none of which have been assessed in this EIAR).

It is our opinion that the value of these stone walls is undervalued in the EIAR. We believe that such value should be increased with a greater emphasis on mitigations for this habitat, and the Maidenhair Fern.

#### 4. Geranium sanguineum

The EIAR states that Cranesbill, *Geranium sanguineum*, (commonly known as Bloody Cranesbill), is growing in the scrub alongside the reservoir, as well as 'recolonising bare ground throughout the site'. An Irish Flora states that this plant is 'locally frequent in Clare and Galway and very rare elsewhere'. The BSBI atlas has no record of it in Limerick.

We have a doubt that the plant has been correctly identified, and suggest that this be checked out. If the site does have *Geranium sanguineum* that has naturally colonised and is spreading, we think that this of botanical interest and the plants should be included in the landscaping plan.

#### 5. Conclusion

In view of the incomplete survey of the site for the Maidenhair Fern and the overlooking of the significance of the presence of *Geranium sanguineum* we recommend a further botanical survey for these two plants be carried out, and mitigating measures adopted for their continued presence on the site.

#### Attachments

BSBI distribution map of the Maidenhair Fern

Photo of Maidenhair Fern on wall of the flaxmill building.

### References

An Irish Flora (Webb's). 2012. John Parnell and Tom Curtis. Cork University Press.

Flora of County Limerick. 2013. Sylvia Reynolds. National Botanic Gardens, Dublin.

Irish Botanical News, No. 34. April 2024. BSBI.

New Flora of the British Isles (4<sup>th</sup> ed). 2019. Clive Stace. Cambridge University Press.

Wildflowers of Cork City and County. 2009. Tony O'Mahony. The Collins Press, Cork

Plant Atlas 2020. 2023. BSBI..



