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27<sup>th</sup> October 2017

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**To: The Cathaoirleach and Each Member of the Municipal District of  
Newcastle West**

**Planning and Development Acts 2000 (as amended)  
Planning and Development Regulations 2001 (as amended)(Part VIII)**

**Proposed incorporation of the Barnagh Tunnel and Viewing Area onto the Great  
Southern Greenway Limerick.**

A Chomhairleoir, a chara,

I enclose herewith a report prepared in accordance with the Planning & Development Acts 2000 (as amended) and Part VIII of the Planning & Development Regulations 2001 (as amended) in relation to the above

The scope of works is outlined here:

1. The installation of an underpass under the N21 to incorporate the Barnagh viewing area and Barnagh Tunnel onto the Great Southern Greenway Limerick.
2. Upgrade 1.4km of the old railway line to greenway standard.
3. Enhancement works to the viewing area and approach to it.
4. Installation of post and rail fencing at vulnerable locations.
5. Provision of certain drainage works in a number of locations.
6. Installation of seating and cycle stands at miscellaneous locations.
7. Installation of signage including:
  - a. Information sign boards and related structures,
  - b. Directional signage on the greenway and on the N21 and related roads

This proposal was advertised on the 5<sup>th</sup> of August, 2017, and plans and particulars in relation to same were made available for inspection from the 5<sup>th</sup> of August 2017 to Tuesday 5<sup>th</sup> of September 2017. The closing date for submissions was Wednesday the 20<sup>th</sup> of September 2017. Four submissions were received and the responses and conditions are outlined in the report.

It is proposed to proceed with the development as outlined in the report.

Is mise le meas,

*Pat Daly*

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**DIRECTOR,  
ECONOMIC DEVELOPMENT**



**PLANNING REPORT IN ACCORDANCE WITH  
SECTION 179 3(a) OF THE PLANNING AND  
DEVELOPMENT ACT 2000 (as amended)**

**Re:** 1. the installation of an underpass under the N21 to incorporate the Barnagh viewing area and Barnagh Tunnel onto the Great Southern Greenway Limerick. 2. Upgrade 1.4km of the old railway line to greenway standard. 3. Enhancement works to the viewing area and approach to it. 4. Installation of post and rail fencing at vulnerable locations. 5. Provision of certain drainage works in a number of locations. 6. Installation of seating and cycle stands at miscellaneous locations. 7. Installation of signage including: a. information sign boards and related structures, b. directional signage on the greenway and on the N21 and related roads.

**Planning Reference No: 17/8009**



**Lisa Ruttle**  
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A/ Senior Planner



**Pat Daly**  
Director of Services Economic  
Development

Pursuant to Section 179 3(a) of the Planning & Development Act 2000-2015, this report is submitted to the members of Limerick City & County Council. In accordance with Section 179(4) (b) of the above Act, it is proposed to proceed as indicated in Section 5 of this report



**Conn Murray**  
Chief Executive  
Limerick City and County Council

**Date:** 3<sup>rd</sup> October 2017

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## **1.0 Foreword**

This planning report has been prepared pursuant to Section 179 of the Planning and Development Act 2000-2015 and Part 8 of the Planning and Development Regulations 2001-2015.

## **2.0 Description of the nature and extent of the proposed development**

The Great Southern Greenway (formerly known as the Great Southern Trail (GST)) is a 96km stretch of countryside in West Limerick/North Kerry. It was the former route taken by the Limerick - Tralee/ Fenit railway line, which opened in stages between 1867 and 1887. Most of the route closed between 1975 and 1978 but remains in the ownership of CIÉ (the National Transport Company). In Limerick, approximately 38km of the Great Southern Greenway has been developed for off road walking and cycling from Rathkeale to Kilmorna, Abbeyfeale (county boundary). The route passes through the countryside allowing the walker/cyclist the opportunity to stop off in towns and villages along the route including Rathkeale, Ardagh, Newcastle West, Templeglantine and Abbeyfeale.

The proposed development includes:

- The installation of an underpass under the N21 to incorporate the Barnagh viewing area and Barnagh Tunnel onto the Great Southern Greenway
- Upgrade 1.4km of the old railway line to greenway standard
- Enhancement works to the viewing area and approach to it
- Installation of post and rail fencing at vulnerable locations
- Provision of certain drainage works in a number of locations
- Installation of seating and cycle stands at miscellaneous locations
- Installation of signage including: a. information sign boards and related structures, b. directional signage on the greenway and on the N21 and related roads

The plans and particulars went on public display from Saturday the 5<sup>th</sup> of August to Tuesday the 5<sup>th</sup> of September 2017. Submissions and observations had to be submitted by Wednesday the 20<sup>th</sup> of September 2017.



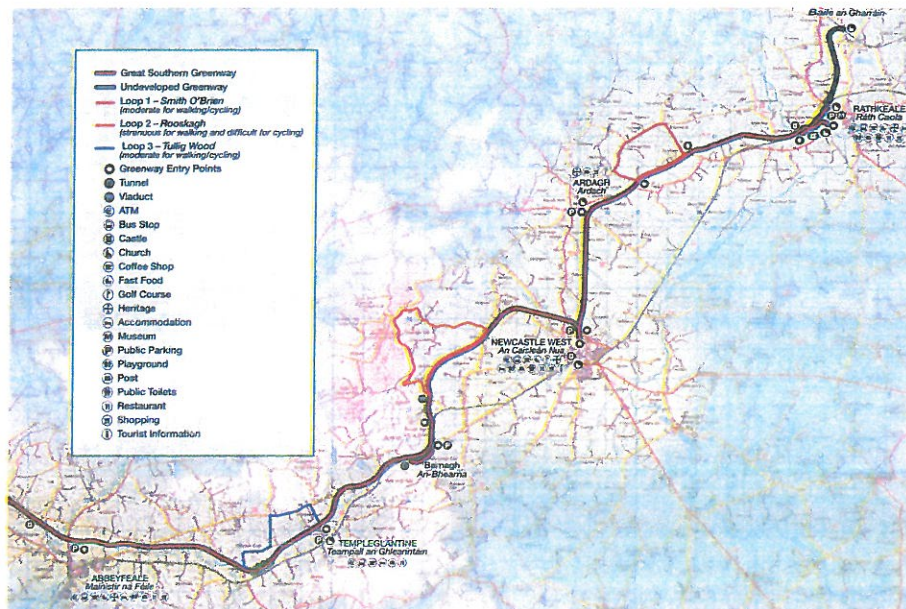


Figure 1: Great Southern Greenway route map  
Source: [www.southerntrail.net](http://www.southerntrail.net)

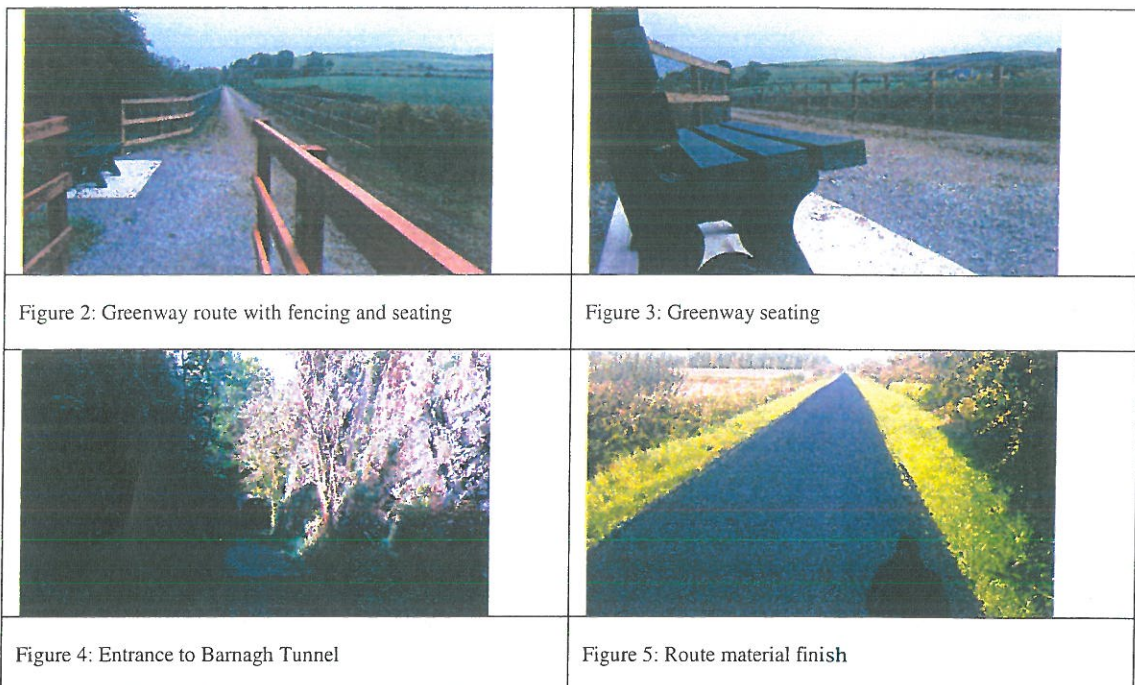


Figure 2: Greenway route with fencing and seating

Figure 3: Greenway seating

Figure 4: Entrance to Barnagh Tunnel

Figure 5: Route material finish

### **3.0 Likely implications, if any, with respect to the proper planning and sustainable development of the area**

It is considered that the proposed improvements will have a positive and enhancing effect on the existing Greenway route and for the wider hinterland of West Limerick. The proposal will enhance the Greenway in terms of accessibility, safety and amenity through the inclusion of the Barnagh Tunnel for walkers and cyclists, therefore, decreasing the likelihood of users to this part of the Greenway to walk/ cycle across the N21 national primary route. This also includes for the upgrade of 1.4km of the old railway line to greenway standard, enhancement works to the Barnagh Viewing Area and the approach to it, the installation of post and rail fencing at vulnerable locations, provision of certain drainage works in a number of locations, installation of seating and cycle stands at miscellaneous locations, and installation of signage including information sign boards and related structures, directional signage on the Greenway, the N21 and related roads.

The proposed installations will make the Greenway more user friendly, in addition to the amenity value of the cycle stands, information boards and seating. All ancillary infrastructural works such as drainage will assist in the improvement and continued safe use of the Greenway.

It is envisaged that the works will have a positive impact for the Great Southern Greenway and improve the profile of the route nationally and internationally. The Limerick County Development Plan 2010 - 2016 sets out the following with respect to the development and improvement of walking and cycling facilities.

#### **3.1 Policy**

##### **Objective COM O26: National Cycle Policy Framework**

It is the objective of the Council to support the policies of the 'National Cycle Policy Framework 2009-2020 – Smarter Travel', Department of Transport, April 2009.

##### **Objective COM O27: Co-operation with Other Agencies**

a) It is the objective of the Council to co-operate with representative bodies of walking and cycling groups, landowners, farmers, local groups and communities, and others to support the improvement and development of walking and cycling routes in an environmentally sustainable manner.

b) It is the objective of the Council to commence an assessment into the feasibility of working in partnership with state, private and voluntary sectors to develop a walking and cycling policy for the county within the lifetime of the Plan with a view to establishing a register of walking routes, legal status of same, the mapping and promotion of guided walks and developing links with neighbouring counties.

##### **Objective COM O29: Proposed Developments and Design Considerations**

It is the objective of the Council to:

a) Encourage the successful incorporation of safe and efficient cycle ways, accessible footpaths, and pedestrian routes, and general cycling facilities into the design schemes for town centres/neighbourhood centres, residential, educational, employment, recreational developments and other uses. (Refer to Development Management



Guidelines)

- b) Provide cycle ways, where appropriate, as part of all road improvement / redesign schemes ensuring, where possible, that cycle ways and footpaths are effectively separated from major vehicular carriageways,
- c) Prioritise the movement of pedestrians and cyclists in proximity to public transport nodes.
- d) Require planning applications for residential, commercial, retail, community, educational and industrial developments to demonstrate the proposal's accessibility for pedestrians and cyclists.
- e) Seek provision of appropriate, well-designed pedestrian ways for residential development proposals to link with amenities and facilities. Such proposals shall adhere to the Guidelines on Sustainable Residential Development in Urban Areas and Urban Design Manual (DEHLG May 2009)

**Objective IN O8: Cycle and pedestrian facilities**

It is an objective of the Council to encourage the successful incorporation of safe and efficient cycle and pedestrian facilities, and accessible cycleways, footpaths and pedestrian routes into the design schemes for residential, educational, employment, and recreational developments. Consideration will be given in these schemes to existing or proposed routes where applicable.

The proposed works are also consistent with the policy objectives of Smarter Travel: A Sustainable Transport Future 2009 – 2020, the National Cycle Policy Framework, 2009 and Limerick County Council Plan 2010-2016 as set out above. The proposed works will enhance the attractiveness of the existing Great Southern Greenway for the benefit of all users.

The proposed works are consistent with the policy objectives of the Newcastle West Local Area Plan 2014-2020 and the Abbeyfeale Local Area Plan 2014-2020.

The proposed works are consistent with the policy objectives of the draft Limerick Tourism Plan.

Newcastle West Vision 2023: Strategic development plan for Newcastle West, chapter 7 Tourism, section 7.5.1 Great Southern Trail/ Greenway

The plan identifies that the GSG needs to be heavily marketed in the same way as the Greenway in Mayo is promoted, and will be a key product in future development of outdoor recreation strategy for West Limerick, and as a catalyst for spin off businesses (guides, bike hire, running events, and cafes).

The proposed works are consistent with the plan's objective to enhance the Greenway as a key product in the future development of outdoor recreation in West Limerick, and will enhance the Greenway's attractiveness as a destination for outdoor recreation.



### 3.2 Habitats Directive Project Screening Assessment

<p><b>Construction Phase:</b>  Installation of an underpass under the N21 to incorporate the Barnagh viewing area and Barnagh Tunnel onto the Great Southern Greenway, upgrade 1.4km of the old railway line to greenway standard, enhancement works to the viewing area and approach to it, installation of post and rail fencing at vulnerable locations, provision of certain drainage works in a number of locations, installation of seating and cycle stands at miscellaneous locations, installation of signage including: a. information sign boards and related structures, b. directional signage on the greenway and on the N21 and related roads  Planning Reference No: 17/8009</p> <p><b>Are effects significant:</b> No</p> <p><b>Are substantial works required:</b> No</p> <p><b>Operating phase effects:</b>  Limited and localised</p> <p><b>Are effects significant:</b> No</p>	<p><b>Ex-situ effects:</b> N/a</p> <p><b>Are effects significant:</b> No</p> <p><b>Run-off:</b> N/a</p> <p><b>Are effects significant:</b> No</p> <p><b>Abstraction:</b> None</p> <p><b>Displacement:</b> None</p>
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Identification of Natura 2000 sites which may be impacted by the proposed development

1	Impacts on designated rivers, streams, lakes and fresh water dependant habitats and species e.g. bogs or otters -see abstraction/run off etc above.	Is the development in the relevant catchment of or immediately up/downstream of a watercourse that has been designated as a Natura 2000 site?	No
2	Impacts on terrestrial habitats and species.-see area and disturbance/displacement effects above.	Is the development within 1km of a SAC site with terrestrial based habitats or species?  Name of site: Lower River Shannon SAC - Abbeyfeale	Yes - Lower River Shannon SAC

<b>3</b>	<b>Impacts on designated marine habitats and species.</b>	<i>Is the development located within marine or intertidal areas or within 5 km of an SAC site whose qualifying habitats or species include the following habitats: Salmonid, Lamprey Mudflats, Sandflats, Saltmarsh, Shingle, Reefs, Sea Cliffs</i>	Yes - Lower River Shannon SAC
<b>4</b>	<b>Impacts on birds in SPAs</b>	<i>Is the development within 1km of a Special Protection Area</i>	No – 6km from the Stacks to Mullagharierks Special Protection Area
<b>5</b>	<b>Cumulative effects</b>	Would consideration of a number of significant projects nearby such as forested areas, quarries, wind energy together with the proposed development significantly increase the impacts listed above:	No

An Appropriate Assessment Screening Report was prepared. The screening assessment concluded that the project will not have negative impacts or effects on any Natura 2000 sites. The nearest designated Natura 2000 site in the vicinity of the site are set out below:

- The Askeaton Fen Complex (002279) is located 21.3 km to the north-east at its closest point. Its features of interest are Calcareous fens with *Cladium mariscus* and species of the *Caricion davallianae* [7210] and Alkaline fens [7230]
- Barrigone grassland SAC site (000432) is located 19 km to the north east. Its features of interest are as follows: *Juniperus communis* formations on heaths or calcareous grasslands [5130] Semi-natural dry grasslands and scrubland facies on calcareous substrates (*Festuco-Brometalia*) (\* important orchid sites) [6210], Limestone pavements [8240]. *Euphydryas aurinia* (Marsh Fritillary) [1065]
- Curraghchase Woodlands site is 26 km to the northeast of the trail and has been designated for the Lesser Horseshoe Bat (Site Code 0000174) and is a mixed woodland site.
- Lower river Shannon SAC site 9002165); designated for a range of riparian habitats and species such as otter and lamprey. At its closest point it is 5.7km away and lies to west.

- The works are adjacent to, but not within the Stacks' to Mullaghareirks Mountains , West Limerick Hills and Mount Eagle SPA (004161).

Accordingly, the Planning Authority is of the view that the development will not have any significant impacts on any Natura 2000 sites. Therefore an Appropriate Assessment (AA) is not considered necessary in this case.

The development has been subject of an Appropriate Assessment Screening in accordance with Article 6 (3) of the EU Habitats Directive (Directive 92/43/EEC) and the Planning & Development Acts 2000 (as amended).

### **3.3 Environmental Impact Screening**

An Environmental Impact Statement screening report has been carried out in line with relevant legislation. The primary objective of the EIA Directive is to ensure that projects which are likely to have significant effects on the environment are subject to an assessment of their likely impacts. The Directive outlines in Article 4 (1) 21 Annex 1 projects that require mandatory EIA. Article 4 (2) outlines Annex 2 projects that require consideration for EIA further to a case by case examination or through thresholds and criteria established by Member States. Projects requiring mandatory EIA are listed in Schedule 5 of the Planning and Development Regulations 2001, as amended. Where developments are under the relevant EIA threshold, planning authorities are required under Article 103 of the 2001 Regulations, as amended, to request an EIS where it considers the proposed development is likely to have a significant effect on the environment. In these cases the significant effects of the project are assessed relative to the criteria contained in Schedule 7a of the Regulations.

A series of standard mitigation measures to ensure that pollutants and construction waste would not enter water courses will help to avoid pollution from these sources. These measures are based on those drawn up by Inland Fisheries Ireland (IFI) and shall be included as actions set out below.

In conclusion significant environmental effects from the development of the proposed works are not expected to have any significant effects and progression to a full Environmental Impact Assessment is not necessary. They fall below the threshold of road or route-ways and the scale of the works, being modifications or additions to the infrastructure on the Greenway trail, is such that they will not cause significant effects.

### **3.4 Overall Conclusion**

It is considered that the proposed development is in accordance with the Limerick County Development Plan 2010 – 2016 and the proper planning and sustainable development of the area.

## 4.0 Submissions with respect to the proposed development

A total of 4 written submissions/observations were received and are listed below:

LIST OF SUBMISSIONS RECEIVED		
SUB REF	FROM	Date Received
(A)	Irish Water	04/08/17
(B)	Transport Infrastructure Ireland (TII)	01/09/17
(C)	Mid West National Road Design Office	08/09/17
(D)	South Operational Division, Limerick City & County Council	12/09/17

### SUB (A) Irish Water

#### Submission description

No objection (Class 1).

1). Where the Applicant proposes to connect to a public water/ wastewater network operated by Irish Water and the Applicant must sign a connection agreement with Irish Water prior to the commencement of the development and adhere to the standards and conditions set out in that agreement.

2). In the interest of Public Health and Environmental Sustainability, proposed connections to the Water and Waste Water Infrastructure will be subject to the constraints of the Irish Water Capital Investment Programme.

3). The Applicant is to make themselves aware of any watermains or sewers that may be within the site and note that in accordance with the requirements of section 104 of the 2007 Water Services Act there shall be no building over water mains, common pipes, or sewers, and if found the Applicant must contact Limerick City & County Council Water Services Department/ Irish Water with a proposal for altering at the cost of the Applicant.

#### Economic Development Comments:

Noted.

#### Planning Department Comments:

The Planning Authority notes the above and an appropriate action shall apply.

### SUB (B) Transport Infrastructure Ireland (TII)

#### Submission description

In the case of the above planning application, the Authority will rely on your planning authority to abide by official policy in relation to development on/affecting national roads as outlined in DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012), subject to the following:



- The Authority requests that the Council has regard to the provisions of Chapter 3 of the DoECLG Spatial Planning and National Roads Guidelines in the assessment and determination of the subject planning application.

All works on or adjacent to the N21 should be the subject of a Road Safety Audit in accordance with the guidelines in TII Publications. Any recommendations arising should be incorporated and funded by the developer.

Economic Development Comments:  
Noted.

Planning Department Comments:  
The Planning Authority notes the above and an appropriate action shall apply

#### **SUB (C) Mid West National Road Design Office**

##### Submission description

The Mid West National Road Design Office has the following observations to make in relation to the above application:

The N21 underpass should be designed in compliance with TII's publication DN-STR-03001 – Technical Acceptance of Road Structures on Motorways and Other National Roads. This application should also be subjected to a Road Safety Audit.

Economic Development Comments:  
Noted.

Planning Department Comments:  
The Planning Authority notes the above and an appropriate action shall apply.

#### **SUB (D) South Operational Division, Limerick City & County Council**

##### Submission description

Comments as follows:

1. Car, Accessible and Cycle Parking:

The Barnagh Viewing Area Car Park has the following number of car parking spaces:

- 1 no disabled space;
- 13 no car spaces; and
- 2 no coach / truck spaces.

The existing disabled space does not comply with the minimum dimensions required by the Irish Wheelchair Association.

No cycle parking is provided however there is sufficient space to rest bicycles next to the existing post and rail fence in the proximity of the picnic tables.

- Condition the applicant to submit a revised car park layout drawing for approval prior to construction. The disabled parking space shall comply with the Irish Wheelchair Association requirements.

## 2. Roads & Footpaths:

A minimum shared width of 3m is proposed for the recreational route. This is in line with the European requirements for a Greenway.

- Surface Course, 50mm Clause 912 AC14 Close Surface Course with a 2.5% one directional cross fall; and
- Sub-Base, 150mm Minimum Clause 804 (Machine Laid).

A blinded clause 804 surface would be more suitable for this scheme. From discussions with Limerick City and County Council representatives promoting this scheme this will be the case.

- Condition the applicant to submit updated construction details of the proposed Greenway for approval prior to construction.

## 3. Surface Water Disposal:

There is an existing network of open drains in the area.

From the N21 to the Tunnel mouth these are less defined as this section has very little use and is impassable in places due to localised ponding. It is proposed to re-construct the open drainage system over this section to connect in with the existing drainage system to ensure surface water disposal.

It is proposed that the underpass of the N21 will have an open drainage channel. The works around the construction of the underpass are to have a proposed 150mm Dia Perforated Pipes to drain the embankment.

- Condition the applicant to provide revised embankment drainage details for the scheme for approval prior to construction, 225mm Dia Perforated Pipes should be shown.

## 4. Signage

No details of signage have been provided. The pedestrian/cyclist interface with the N21 at the Barnagh Viewing Area Car Park will have to be clearly signed to ensure pedestrians/cyclists do not think the Greenway continues on the N21 towards Newcastle West or cross the N21 to join the Greenway.

- Condition the applicant to provide signage details for the scheme for approval prior to construction.

## 5. Public Lighting

Public lighting is to be provided in the underpass however no design report accompanies the application. No public lighting is available in the Barnagh Tunnel, this should be assessed and if required designed and signed by a Lighting Design Engineer. This design can be sent for approval to Kieran Fitzgerald of Operations & Maintenance Services, Central Services, Limerick City & County Council, Dooradoyle Road, Limerick. Public lighting to be energy efficient, ie. LED.

- Condition the applicant to provide public lighting design details for the scheme for approval prior to construction.

## 6. Construction Methodology and Management

No details have been supplied on the method of construction of the underpass. Construction management and delivery plan for the construction of the development to be agreed with the Roads Engineers of Limerick City and County Council prior to the commencement of construction.

- Condition the applicant to provide construction methodology and management details for the scheme for approval prior to construction.

## 7. Road Opening Licence Requirement

A Road Opening Licence from Limerick City & County Council is required for any connection for services or construction works onto the section already in the charge of Limerick City & County Council.

### Economic Development Comments:

#### 1. Car & Cycle Parking

Disabled car parking spaces will comply the guidelines set out in the Irish Wheelchair Association and all road markings at the viewing area will comply with TII Chapter 7 Traffic Signs Manual design guidelines.

Sheffield style stainless steel Cycle stands will be provided in proximity to the existing picnic benches.

#### 2. Roads and Footpaths

The existing track surface and cross fall is outlined in Drawing no.PO940-FTC-ZZ-XX-DR-T-0140 submitted with Part VIII application.

Limerick City and County Council propose to surface the existing and additional track section with 30mm Black Crushed Rock Fines. This detail will be included with both Construction and Tender documentation.

#### 3. Surface Water Disposal

All pipe sizes and detailed drainage drawings along with pipe sizes for embankments will be agreed prior to issuing of Construction and Tender Drawings and documentation.

#### 4. Signage

All signage including directional, information boards and advisory will be agreed prior to issuing of construction and tender drawings and will include warning signs at viewing park advising users to exit via Barnagh Tunnel. Fingerpost, directional and townland signage will be in keeping with existing signage on the Greenway and will adhere to the Greenway Design and Brand Guidelines.

#### 5. Public Lighting

Public lighting details for both the underpass and existing tunnel will be agreed prior to construction and details of which will form part of Tender and Construction drawings and documentation.

In relation to the existing tunnel, bat friendly low level lighting located in the alcoves along the tunnel will be agreed with the relevant bodies prior to construction.



#### 6. Construction Methodology and Road Opening Licence

A method of construction will be agreed with the Roads Engineer of Limerick City and County Council prior to issuing of Tender and Construction documentation along with a Road Opening License.

#### Planning Department Comments:

The Planning Authority notes the above and appropriate actions shall apply.

### **5.0 Action taken by Local Authority**

It is proposed to proceed with the development in accordance with the drawings submitted and the details and specifications contained in this report.

1. Fuels oils and lubricants shall be stored in safe areas at least 25m from any water course. Refuelling of machinery shall take place at a similar distance from any water course.  
Reason: In the interest of proper planning and orderly development.
2. Concrete mixing areas, where these occur, shall be located 25m from any watercourse and shall be managed appropriately to avoid spillages. No concrete washings are to be discharged to water courses.  
Reason: In the interest of proper planning and orderly development.
3. Sand and gravel shall be stored 25m from any drain or water course and any excess shall be removed after works have been completed to minimise risk of run off and possible sedimentation in watercourses or drains.  
Reason: In the interest of proper planning and orderly development.
4. Water course banks and the embankment shall be left intact, on completion of works.  
Reason: In the interest of proper planning and orderly development.
5. There shall be no building over water mains, common pipes, or sewers, and if found the Applicant shall contact Limerick City & County Council Water Services Department/ Irish Water with a proposal for altering at the cost of the Applicant.  
Reason: In the interest of proper planning and orderly development.
6. All works on or adjacent to the N21 shall be the subject of a Road Safety Audit in accordance with the guidelines in TII Publications. Any recommendations arising shall be incorporated and funded by the applicant. Prior to the commencement of construction the Road Safety Audit shall be submitted for the written agreement of the Planning Authority.  
Reason: In the interest of traffic safety.
7. The N21 underpass shall be designed in compliance with TII's publication DN-STR-03001 – Technical Acceptance of Road Structures on Motorways and Other National Roads.  
Reason: In the interest of traffic safety.



8. Prior to the commencement of construction the following shall be submitted for the written agreement of the Planning Authority.
- a. Updated construction details of the proposed Greenway
  - b. A revised carpark layout showing disabled car spaces complying with the Irish Wheelchair Association Requirements.
  - c. A revised embankment drainage details for the scheme - 225mm Dia Perforated Pipes to be provided.
  - d. Signage details.
  - e. Public lighting design details.
  - f. Construction methodology and management details for the scheme.

Reason: In the interest of proper planning and orderly development.

9. The surviving railway infrastructure shall be retained where possible. The amount of cracks and fissures to be in-filled shall be kept to a minimum in order to preserve roosting habitats for bats and birds

Reason: In order to conserve the built heritage of the Greenway and to safeguard existing habitats.

10. Scrub removal shall take place outside of the bird nesting season. Minimal amount of vegetation shall be removed from the sides of the railway cutting consistent with aim of allowing access. Replacement planning and construction of small ponds to take place where space allows.

Reason: To safeguard existing habitats.

11. The proposed tunnel under the N21 shall incorporate woodcrete bat boxes in order to offer additional bat roosting opportunities. The old station house outside the scope of the works shall remain undisturbed.

Reason: To safeguard existing habitats.

