

## Memo

**To:** Pat Daly, Chief Executive

**From:** Vincent Murray, Director of Services, Planning, Environment and Place Making

**Date:** 08/01/2024

**Re:** Part 8 proposal, Reference 23/8013 – The proposed development is for the construction of dedicated cycle track facilities on both sides of the R526 St. Nessan's Road over an approximate length of 600m between the St. Nessan's Park entrance road (south of St. Paul's Roundabout) and the Crescent Shopping Centre entrance road (north of Ballykeeffe Roundabout).

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Dear Chief Executive,

Please find attached for your consideration report prepared in accordance with Section 179 of the Planning and Development Act 2000 (as amended) in respect of a proposal for dedicated cycle track facilities on both sides of the R526 St. Nessan's Road.

The proposal prepared by the Active Travel Department of the Transport and Mobility Directorate has been evaluated taking into consideration all submissions received. It is concluded that the proposed development is in accordance with the objectives of the Limerick Development Plan 2022 – 2028, and the proper planning and sustainable development of the area.

It is recommended that the proposed development be recommended to the Elected Members of Limerick City & County Council for their approval.



**Signed:** \_\_\_\_\_  
**Jennifer Mc Nulty, Executive Planner**

  
**Donogh O'Donoghue, Senior Executive Planner**  
**Signed:** \_\_\_\_\_  
**Vincent Murray, Director of Services, Planning, Environment and Place Making**



**CHIEF EXECUTIVE'S REPORT & RECOMMENDATION IN ACCORDANCE  
WITH SECTION 179 3(a) OF THE PLANNING & DEVELOPMENT  
ACT 2000 (AS AMENDED)**

**Re: Proposed Development:**

Permission for the development works that will consist of:

- (1) Construction of dedicated cycle track facilities on both sides of the R526 St. Nessans Road over an approximate length of 600m between the St. Nessans Park entrance road (south of St. Pauls Roundabout) and the Crescent Shopping Centre entrance road (north of Ballykeeffe Roundabout) to encompass St. Pauls Roundabout and Ballykeeffe Roundabout and alterations to existing road carriageway widths;
- (2) Provision of a shared street arrangement through Ballykeeffe Estate to facilitate cyclist access to/from Ballykeeffe Roundabout;
- (3) Re-construction of pedestrian footpaths on both sides of the R526 where required to facilitate the upgrade works;
- (4) Upgrade of the existing zebra crossings on the R526 adjacent St. Pauls Roundabout to signalised pedestrian/cyclist crossings, upgrade of the existing crossing on the L-1429 Father Russell Road and provision of a new crossing on the Scoil Phoil Naofa access road;
- (5) Provision of bus priority signals on the northbound and southbound approaches to St. Pauls Roundabout on the R526 in conjunction with the crossing upgrades;
- (6) Re-construction of a section of the boundary wall to St. Pauls Nursing Home;
- (7) Closure of an existing entrance off St. Pauls Roundabout to St. Pauls Nursing Home;
- (8) Reconstruction of a section of the low boundary wall to protected structure No. 1648 St. Pauls Church Dooradoyle;
- (9) Alterations to the Ballykeeffe Estate junction with the R526;
- (10) Upgrade of the existing zebra crossings on the R526 and the zebra crossings on the R926 adjoining Ballykeeffe Roundabout to signalised crossings;
- (11) Provision of bus priority signals on the southbound approach to Ballykeeffe Roundabout on the R526 in conjunction with the crossing upgrade;
- (12) Provision of a stepped pedestrian access route from Ballykeeffe Estate and road crossing on the western arm of the Ballykeeffe Roundabout on the R526;
- (13) Re-construction of existing bus stop facilities including for the provision of island bus stop arrangements at four separate locations;
- (14) Improvements to drainage, water and utility services where required;
- (15) Road re-surfacing, road markings and coloured surfacing to cycle facilities where required;
- (16) Existing trees to be removed / cut back as required for the construction of the footway and cycle facilities. New trees and landscaping to be provided to compensate for removal of trees;
- (17) All associated site works.

The development is to be carried out in the townlands of Ballykeeffe, Dooradoyle and Gouldavoher, Limerick. Limerick City & County Council has carried out an Environmental Impact Assessment (EIA) Screening Report in accordance with the Roads Act 1993 (S.I. No 14 of 1993) as amended and has determined that there is no real likelihood of significant effects on the environment. Accordingly, it has been determined that EIA is not required in respect of this proposed development. Nonetheless, a person may within 4 weeks from the date of the notice, apply to An Bord Pleanála for a screening determination. Such a submission should be addressed to the

Secretary, An Bord Pleanála, 64 Marlborough Street, Dublin 1. Limerick City & County Council has carried out an Appropriate Assessment (AA) Screening Report and has determined a that a full Appropriate Assessment is not required in respect of this proposed development.

**At:** R526 St. Nessans Road commencing to the south of St. Paul's Roundabout and extending to the north of Ballykeeffe Roundabout, Dooradoyle

**Reference Number 23/8013**

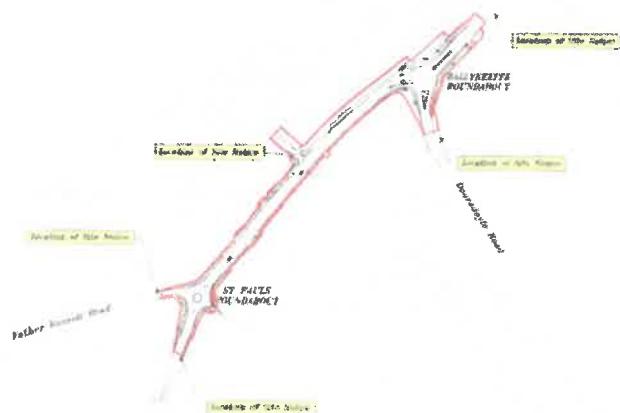
## 1.0 Foreword

This Chief Executive Report and Recommendation has been prepared pursuant to Section 179 of the Planning & Development Act 2000 (as amended), and Part 8 of the Planning & Development Regulations 2001 (as amended).

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

The proposal is to upgrade cycling facilities and cyclist/pedestrian crossing facilities along the R526 St. Nessan's Road from St Pauls Roundabout to Ballykeeffe Roundabout. The works include segregated cycle lanes, shared carriageway and footpath upgrades/reconstruction on the R526. This cycle lane project is based on the recommendations of the Limerick Metropolitan Cycle Network Study (LMCNS) which identified this route as part of the primary cycle network.

### 2.1 Site Location



## 2.2 Public Consultation:

The plans and particulars were placed on public display from the 27<sup>th</sup> of September 2023 up to and including 25<sup>th</sup> of October 2023. Submissions and observations were invited up to the 9<sup>th</sup> of November 2023.

## 3.0 Submissions with respect of the proposed development

A total of 35 No. written submissions/observations were received and are listed below:

No.	Name
1	Shane Cusack
2	Leo Dillon
3	Sandra Hurley
4	Maurice Egan
5	Limerick Cycling Campaign
6	Melanie Power
7	Edmond O'Rourke
8	St. Paul's Parents Association
9	Tony and Patricia Fitzgibbon
10	Claire Singleton
11	Marie Woulfe
12	Lucy Carr
13	John Duckett
14	Claire Normoyle
15	Seamus Flynn
16	Pat & Mary Dillon
17	Ellen O'Mahony
18	Stephen Aherne
19	Jeremiah Cremin
20	Mary Lynch
21	Mary and Michael Breen
22	Emer O'Donnell
23	Meadbh Meaney and Seamus Griffin
24	Gavin Barry
25	Michael O'Connor
26	Brian Beirne
27	Bernadette Hurley
28	Jack and Vanessa Finucane
29	Peter O' Dowd, Margaret O'Dowd
30	Niamh Cooke
31	Bernie Moroney
32	Gerard Curran
33	Transport Infrastructure Ireland
34	Mid West Road Design Office

**SUB (1) Shane Cusack****Submission Summary:**

1. Are traffic lights necessary when traffic could utilise the roundabouts at either of the scheme. Query regarding flexibility to remove / relocate the structures in the future if a business closes.

**Chief Executive Response:**

1. There is an existing pedestrian crossing of the R526 at this location provided in conjunction with the traffic signals which will be upgraded as part of the Scheme. The existing junction will also be tightened in conjunction with reducing the width of the Ballykeeffe Estate road to reduce crossing distances. The traffic signals allow vehicles exiting the side roads to join traffic. The traffic signal upgrade works will include increased detection of vehicles on the side roads to maximise operation of the signals.

**SUB (2) Leo Dillon****Submission Summary:**

1. Request to replace the proposed toucan crossings on the arms of roundabouts with Zebra crossings due to the delays it will cause to pedestrians and cyclists.

**Chief Executive Response:**

1. In line with the recent publication of the Cycle Design Manual 2023 prepared by the NTA the exact layout and design of crossings will be further examined to ensure compliance with National Guidance and any necessary alterations will be made within the scope of the scheme. Zebra crossings of two traffic lanes on one approach is no longer recommended due to visibility issues that can arise resulting from queuing traffic. It is noted that the crossing of the R526 north of Ballykeeffe roundabout and the R926 south of the roundabout are envisaged to act as a single stage crossings for pedestrians and cyclists which will in effect reduce the number of crossings to be activated from 4 to 2 travelling towards SCR from Dooradoyle Road. The crossings will be brought more in line across the full width of each roadway improving convenience for pedestrians and cyclists.

**SUB (3) Sandra Hurley****Submission Summary:**

1. Concerns related to proposals for Ballykeeffe estate road to be designated a shared street.
2. Public safety - conflicts of cyclists with vehicles accessing and egressing from driveways, traffic congestion, emergency service access, illegal parking, and indirect route.
3. Design out of scale in relation to the estate - a shared street would make the estate less pleasant and damage the dynamic and character of the area.
4. Adverse visual impact of the plan - removal of trees at access ramp.

5. Noise - due to hedging being removed
6. Pollution from urban transport - due to tree removal
7. Disturbance and potential for crime - increased permeability has the potential for a level of disturbance and anti-social behaviour in the area.
8. Impact on property values due to reduction in privacy and change of road to shared street.
9. Alternative proposed - extension of footpath/convert to cycle lane on the green verge between Ballykeeffe estate road and R526.

**Chief Executive Response:**

1. A shared street is a low traffic and low speed road where cyclists can share the space with vehicular traffic.
2. A Road Safety Audit has been prepared which evaluates any hazards in relation to the scheme and public safety. The provision of a shared (or mixed) traffic street is suitable for this low traffic roadway. There is no reduction proposed for the road width within the Ballykeeffe Estate. Access to driveways is unchanged.
3. Landscaping works are proposed to enhance the environment. The route was selected to minimise impact on trees. Any alternative route along the R526 will likely result in the loss of the green verge and all existing mature trees at this location.
4. The proposed route has been chosen to minimise impact on trees. Landscaping works are proposed to enhance the area. A native hedge will replace the existing ornamental hedge at this location. This and a large quantity of specimen trees (12no. proposed trees replacing 1no. removed tree in the area) planted at 5m height will provide good initial screening. Additional 2m high native hedge planting will be included to soften the visual impact and to maximise screening from the estate towards the roundabout wherever possible.
5. Proposed landscaping will have a similar noise reduction effect as existing landscaping, given the large number of proposed trees and hedge planting. A large section (between Ballykeeffe Roundabout and Ballykeeffe Estate Road) will also have reduced noise pollution since a proposed hedgerow will act as a buffer in the green verge along the R526 (currently only grass verge).
6. Proposed landscaping measures will triple the number of trees along the scheme and introduce approximately 330 linear metres of native hedgerow as well as replacing sterile lawn with species rich floral lawn. The purpose of the proposed landscaping is to improve air quality, reduce noise pollution and increase biodiversity in the area.
7. There is an existing permeability route. The proposed scheme includes minor amendments to existing permeability to provide a safer access for pedestrians and cyclists.
8. The landscaping works provide additional privacy and the changes to the road will be minor.
9. The option of providing the cycle track within the green verge between the Ballykeeffe Estate Road and the R526 was considered as part of the options developed for the Scheme. The drawings, including the alternative option proposed were publicly available during the non statutory consultation. The provision of the cycle track at this location would require the removal of a number of the mature trees in the verge area. In view of the vertical level difference between both roads, a low wall or similar would also be required along a section of the frontage to construct this option which would further increase the hard surface area for the Scheme.

**SUB (4) Maurice Egan****Submission Summary:**

1. Significant departure from desire lines for cyclists at St.Paul's roundabout on the Fr Russell Rd arm.

**Chief Executive Response:**

1. The crossing may be relocated closer to the roundabout within the scope of the scheme and subject to adherence to the Cycle Design Manual.

**SUB (5) Limerick Cycling Campaign****Submission Summary:**

1. Design to be brought into compliance with the new Cycle Design Manual.
2. Fully signalised crossing points for pedestrians and cyclists will provide longer wait times which is a reduction in service from existing Zebra Crossings. CDM offers alternatives such as elephant crossings/elephant footprints.
3. Welcome changes to southern arm of roundabout.
4. Concerns regarding northern arm crossing point - off the desire line, question retention of right hand turn for singular house, converting the Zebra crossings to Toucan crossings will mean longer wait times.
5. Ballykeeffe roundabout - four crossings required for cyclists from Dooradoyle Rd to get to SCR scheme. Toucans will adversely affect wait times for people. Reconsider the crossing design.
6. Welcome quietway on Fr Russell Rd. A formalised cycle connection to Russell Court should be provided.
7. Southbound cyclists on the bi-directional cycle path will not be able to access push button Toucan crossing near entrance to Ballykeeffe estate.
8. Suggest red or buff colour surfacing for Ballykeeffe estate road proposed as shared street.
9. Request all footpaths and cycle lanes remain raised at all junctions.
10. Welcome junction tightening and request further tightening at entrance leading to nursing home.

**Chief Executive Response:**

1. In line with the recent publication of the Cycle Design Manual 2023 prepared by the NTA the exact layout and design of crossings will be further examined to ensure compliance with National Guidance and any necessary alterations will be made within the scope of the scheme.
2. It is noted that the crossings of the R526 and R926 are envisaged to act as single stage crossings for pedestrians and cyclists, which will in effect reduce the number of crossings of each roadway improving convenience for pedestrians and cyclists.
3. Noted.
4. The crossing may be relocated closer to the roundabout within the scope of the scheme and subject to adherence to the Cycle Design Manual.
5. It is noted that the crossings of the R526 and R926 are envisaged to act as single stage crossings for pedestrians and cyclists which will in effect reduce the number of crossings of each roadway improving convenience for pedestrians and cyclists.

6. Noted.

7. A buffer is provided between the road carriageway and the cycle track at this location. A push button facility for cyclists will be considered to be located within the buffer to allow activation of the signals by southbound cyclists.

8. The detail of the Shared Street provision will be reviewed against the new Cycle Design Manual.

9. It is proposed that uncontrolled side road crossings will be raised. The detail at the controlled crossing locations are to be further reviewed against the new Cycle Design Manual.

10. Noted.

**SUB (6) Melanie Power**

**Submission Summary:**

1. Toucan crossings- St Nesson Road and Fr Russell Road. Query regarding whether it will contain a signalised beeping system.

**Chief Executive Response:**

1. Toucan crossings have a beeping noise to assist visually impaired pedestrians, the volume during the day is equivalent to conversational volume, the volume is reduced to less than 10dB at night (very quiet). The hours of the reduced volume can be reviewed for each location.

**SUB (7) Edmond O'Rourke**

**Submission Summary:**

1. Copy of Submission number 3.

**Chief Executive Response:**

1. See response to Submission number 3.

**SUB (8) St. Paul's NS Parents Association**

**Submission Summary:**

1. The Parents Association of St. Paul's NS Dooradoyle wish to convey our support for the proposed scheme. With the help of infrastructural developments in the vicinity of the school, St.Paul's school has made great strides in increasing the number of pupils cycling to school; the proposed scheme will further enable a far greater number of pupils to cycle independently.

**Chief Executive Response:**

1. Noted.

**SUB (9) Tony and Patricia Fitzgibbon**

**Submission Summary:**

1. Concerns related to the location of the Crossing on the Fr Russell Rd Arm of St. Paul's Roundabout. Request the crossing to be closer to Gouldavoher.

**Chief Executive Response:**

1. A crossing is required on all arms of the St. Paul's roundabout, optimum location is close to the roundabout to cater for pedestrians and cyclists continuing on St.Nessans Road (R526).

**SUB (10) Claire Singleton**

**Submission Summary:**

1. No stop and go system
2. No beeping sound from crossing signals as this would be an annoyance and nuisance both day and night.

**Chief Executive Response:**

1. Noted.
2. Toucan crossings have a beeping noise to assist visually impaired pedestrians, the volume during the day is equivalent to conversational volume, the volume is reduced to less than 10dB at night (very quiet). The hours of the reduced volume can be reviewed for each location.

**SUB (11) Marie Woulfe**

**Submission Summary:**

1. Copy of Submission number 3.

**Chief Executive Response:**

1. See response to Submission number 3.

**SUB (12) Lucy Carr**

**Submission Summary:**

1. Object to works on the Fr Russell Rd in front of the curtailment of their property.

**Chief Executive Response:**

1. The proposed scheme is from Ballykeeffe roundabout to St. Paul's roundabout.

**SUB (13) John Duckett**

**Submission Summary:**

1. Copy of Submission number 3.

**Chief Executive Response:**

1. See response to Submission number 3.

**SUB (14) Claire Normoyle**

**Submission Summary:**

1. Concerns related to infrastructure related to the crossing - flashing lights and any signals that emit noise 24 hours a day would cause nuisance to residents and should be avoided.
2. Consideration to location of their driveway due to proximity to the crossing. There are issues with visibility and would like footpath widening and/or the drop kerb to be extended in an effort to reduce the issues.

**Chief Executive Response:**

1. Toucan crossings have a beeping noise to assist visually impaired pedestrians, the volume during the day is equivalent to conversational volume, the volume is reduced to less than 10dB at night (very quiet). The hours of the reduced volume can be reviewed for each location. Zebra crossings have flashing lights, which are cowlled to mitigate disturbance.
2. A Road Safety Audit has been prepared on the details of the Scheme to review public safety associated with the proposed Scheme. Proximity of driveways to proposed crossing will be taken into consideration.

**SUB (15) Seamus Flynn**

**Submission Summary:**

1. Copy of Submission number 3.

**Chief Executive Response:**

1. See response to Submission number 3.

**SUB (16) Pat & Mary Dillon**

**Submission Summary:**

1. Copy of Submission number 3.

**Chief Executive Response:**

1. See response to Submission number 3.

**SUB (17) Ellen O'Mahony**

**Submission Summary:**

1. Copy of Submission number 3.

**Chief Executive Response:**

1. See response to Submission number 3.

**SUB (18) Stephen Aherne**

**Submission Summary:**

1. Copy of Submission number 3.

**Chief Executive Response:**

1. See response to Submission number 3.

**SUB (19) Jeremiah Cremin**

**Submission Summary:**

1. Copy of Submission number 3.

**Chief Executive Response:**

1. See response to Submission number 3.

**SUB (20) Mary Lynch**

**Submission Summary:**

1. Copy of Submission number 3.

**Chief Executive Response:**

1. See response to Submission number 3.

**SUB (21) Mary and Michael Breen**

**Submission Summary:**

1. Copy of Submission number 3.

**Chief Executive Response:**

1. See response to Submission number 3.

**SUB (22) Emer O'Donnell**

**Submission Summary:**

1. Copy of Submission number 3.

**Chief Executive Response:**

1. See response to Submission number 3.

**SUB (23) Meadbh Meaney and Seamus Griffin**

**Submission Summary:**

1. Copy of Submission number 3.

**Chief Executive Response:**

1. See response to Submission number 3.

**SUB (24) Gavin Barry**

**Submission Summary:**

1. Copy of Submission number 3.

**Chief Executive Response:**

1. See response to Submission number 3.

**SUB (25) Michael O'Connor**

**Submission Summary:**

1. Copy of Submission number 3.

**Chief Executive Response:**

1. See response to Submission number 3.

**SUB (26) Brian Beirne**

**Submission Summary:**

1. Copy of Submission number 3.

**Chief Executive Response:**

1. See response to Submission number 3.

**SUB (27) Bernadette Hurley**

**Submission Summary:**

1. Copy of Submission number 3.

**Chief Executive Response:**

1. See response to Submission number 3.

**SUB (28) Jack and Vanessa Finucane**

**Submission Summary:**

1. Concerns regarding the proposed Toucan Crossing system and the constant beeping noise that is typical of this type of crossing. Requests measures to reduce the impact of this beeping.

**Chief Executive Response:**

1. Toucan crossings have a beeping noise to assist visually impaired pedestrians, the volume during the day is equivalent to conversational volume, the volume is reduced to less than 10dB at night (very quiet). The hours of the reduced volume can be reviewed for each location.

**SUB (29) Peter and Margaret Dowd**

**Submission Summary:**

1. Copy of Submission number 3.

**Chief Executive Response:**

1. See response to Submission number 3.

**SUB (30) Niamh Cooke**

**Submission Summary:**

1. Copy of Submission number 3.

**Chief Executive Response:**

1. See response to Submission number 3.

**SUB (31) Bernie Moroney**

**Submission Summary:**

1. Copy of Submission number 3.

**Chief Executive Response:**

1. See response to Submission number 3.

**SUB (32) Gerard Curran****Submission Summary:**

1. Copy of Submission number 3.

**Chief Executive Response:**

1. See response to Submission number 3.

**SUB (33) Transport Infrastructure Ireland****Submission Summary:**

1. No specific observations.

**Chief Executive Response:**

1. Noted.

**SUB (34) Mid West Road Design Office****Submission Summary:**

1. No specific observations.

**Chief Executive Response:**

1. Noted

**SUB (35) Andrea Deverell – University of Limerick****Submission Summary:**

1. Support the proposed scheme it will serve as a strong attractive active travel link, connecting this area onward into Limerick City and UL.
2. Roundabout designs do not seem to align with 2023 Cycle Design Manual – flared entrances will maintain high speeds. Signalised crossings are set well back from the roundabout. Signalised crossings are combined rather than segregated. It is not clear there is waiting room for the Universal Design Cycle or that it will be easy to turn in this page.
3. Consideration for the Universal Design Cycle as there are tight corners (near Ballykeeffe Estate Access Road) – vehicle tracking analysis.
4. The wayfinding/coherence seems low for cyclists.
5. Consideration for linking the cycle lanes to the R526 crossing to enable cyclists to turn right through the roundabout.
6. Introduction of steps by the proposed pedestrian crossing on R526.

**Chief Executive Response:**

1. Noted.
2. Junction tightening is proposed with the overall roundabout carriageway footprints reduced and entry/exit lanes to the roundabouts reduced in width to reduce speeds. Approaching road layouts and traffic volumes at the roundabouts require retention of two lanes on some arms of the roundabouts. It is noted that the crossings of the R526 and R926 are envisaged to act as single stage crossings for pedestrians and cyclists on each roadway which will in effect reduce the number of crossings of each roadway improving convenience for pedestrians and cyclists.
3. Noted.
4. Signage will be provided as required.
5. For the cyclist travelling towards the city on the R926 the crossing on the southern arm of the Ballykeeffe Roundabout will allow for the right turning of cyclists across the R926 to access the two-way cycle track link to the two-way crossing of the R526 and onwards onto the two-way cycle track on the north side of the R526 which links to the SCR Scheme.
6. Suitable ramped footpath access will be provided where feasible.

#### **4.0 Habitats Directive Project Screening Assessment**

An Appropriate Assessment Screening Report has been undertaken by MEC Ltd for the proposed development. Their report concluded ‘that the scheme is not likely, alone or in combination with other plans or projects, to have a significant effect on’ any Natura 2000 sites. Having regard to the overall length of the scheme approximately (0.6km) and the proposed best practice measures as provided for in the Design Approach and Construction Methodology, the Executive is satisfied that the development as proposed should not exercise a significant effect on the conservation status of any SAC or SPA either alone or in combination with other plans or projects and therefore a Stage 2 NIS is not necessary.

#### **5.0 Environmental Impact Assessment Screening**

The application is accompanied by an EIAR screening report undertaken by MEC Ltd. The report has considered relevant thresholds as follows:

The proposed development is not a type of development included for under Schedule 5 Part 2, Class 10. Infrastructure or Class 11. Other Projects of the Planning and Development Regulations 2001, as amended.

The cycle infrastructure is well below the threshold at which a mandatory EIAR is required as defined in Schedule 5 of the Planning & Development Regulations 2001 (as amended). The site area is 0.6km in length. The proposal is an urban development. Having regard to the above the proposed development is considered to be sub threshold in terms of EIA having regard to Schedule 5, Part 2 of the Planning and Development Regulations 2001 (as amended).

The report includes information required under Schedule 7A of the Planning Regulations. The Screening Statement states that having regard to the criteria specified in Schedule 7 of the Planning and Regulations 2001 (as amended), the context and character of the site and

receiving environment and the form and character of the proposed development, the proposal would not result in significant effects on the environment.

In conclusion the following is noted:

- the nature and size of the development is well below the applicable thresholds for EIA;
- the proposal is for the redevelopment of the existing carriageway in an urban area;
- the cycle, pedestrian use would be similar to the predominant land use in the area;
- the proposal would not have a significant effect on any Natura 2000 site;
- the development would not give rise to significant use of natural resources, production of waste, pollution, nuisance or risk of accidents;
- the various reports submitted address a variety of issues and assess the impact of the proposed development.

This EIAR Screening Report has concluded that the effects of the proposed development are not identified as giving rise to significant negative effects on the environment, due to the scale, nature, location and design of the proposed development. The implementation of the standard environmental management practices will also provide safeguards in relation to potential impacts. Given the scale and nature of the project and taking account of all available information, the overall probability of impacts on the receiving environment arising from the proposed development are considered to be temporary and low. These mitigation measures are representative of standard industry environmental management that are implemented to minimise the impact of projects to the environment.

Having reviewed the EIAR screening report and considered other additional information submitted the Executive is satisfied that the proposal as outlined does not require a sub threshold Environmental Impact Assessment Report.

## **6.0 Key Policy Provisions**

The key aim of the proposal is to improve road safety for vulnerable cyclists and pedestrians through the provision of dedicated cycle facilities and the upgrading of footpaths, improved junction arrangements and upgraded and additional crossing points. As set out in this report, the proposed scheme has strong national, regional, and local planning policy support. This includes the National Planning Framework, Limerick Shannon Metropolitan Area Transport Strategy, the Limerick Development Plan, 2022-2028 and the Limerick Metropolitan Cycle Network Plan.

### **6.1 National Policy**

#### **Climate Action Plan (2021)**

The Climate Action Plan 2021 details the plan to reduce greenhouse emissions by 2030 with the goal of reaching net-zero emissions by 2050. The plan outlines the proposals for achieving these goals and also envisages a positive effect on both the economy and society in Ireland. The transport network in Ireland will play a key role in reaching the goals set out in the plan. Investments in walking, cycling and public transport will promote a modal shift reducing the level of private car use in the country.

## **Project Ireland 2040**

Project Ireland 2040 is an initiative set up by the Irish Government to make Ireland better for everyone. The policy recognises that economic and social progress go hand in hand and so prioritises people's wellbeing. The overall objective of the policy is to provide comprehensive social, economic and cultural infrastructure.

## **National Planning Framework**

The National Planning Framework (NPF), part of Project Ireland 2040, is the Government's high-level strategic plan for shaping future growth and development was published in March 2018. The NPF sets out ten National Strategic Outcomes (NSOs) which the framework aims to deliver. A strategic investment priority under the National Development Plan 2018-2027 is public investment in environmentally sustainable public transport systems in major urban areas, as a primary enabler for National Strategic Outcomes under the NPF relating to compact growth.

## **National Investment Framework for Transport in Ireland**

The Department of Transport has published the National Investment Framework for Transport in Ireland (NIFTI). The document is a high-level strategic framework to support the consideration and prioritisation of future investment in land transport. NIFTI was developed to ensure investment is aligned with the National Planning Framework and the delivery of the ten National Strategic Outcomes.

## **National Sustainable Mobility Policy**

In April 2022, the Department of Transport published the National Sustainable Mobility Policy (NSMP) and the supporting NSMP Action Plan, 2022-2025. These documents align with the existing Project Ireland 2040 Framework. The purpose of the policy is described as follows:

“To set out a strategic framework to 2030 for active travel and public transport to support Ireland’s overall requirement to achieve a 51% reduction in carbon emissions by the end of this decade”.

The strategies principal targets are outlined below:

“To deliver at least 500,000 additional daily active travel and public transport journeys and a 10% reduction in kilometres driven by fossil fuelled cars by 2030 in line with metrics for transport set out in the Climate Action Plan 2021”.

The NSMP Action Plan, 2022-2025 outlines 10 No. goals which comprise of a total of 91 N. core actions. Furthermore, the owner, support organisation, timeline and output of each action item is defined. The 10 No. goals are as follows:

### ***Safe & Green Mobility***

1. Improve mobility safety
2. Decarbonise public transport
3. Expand availability of sustainable mobility in metropolitan areas
4. Expand availability of sustainable mobility in rural areas
5. Encourage people to choose sustainable mobility over the private car

### ***People Focused Mobility***

6. Take a whole of journey approach to mobility, promoting inclusive access for all

7. Design infrastructure according to universal design principles and hierarchy of road user's model
8. Promote sustainable mobility through research and citizen engagement

***Better Integrated Mobility***

9. Better integrate land use and transport planning at all levels
10. Promote smart and integrated mobility through innovative technologies and development of appropriate regulation

**Cycle Design Manual, 2023**

The Cycle Design Manual (CDM) sets out guidance in order to provide a safe traffic environment for all road users, including cyclists.

**Design Manual for Urban Roads & Streets**

The Design Manual for Urban Roads & Streets (DMURS) was prepared for the Department of Transport, Tourism and Sport and the Department of Environment, Community and Local Government. DMURS provides guidance on designing urban roads and streets. It presents the principles, approaches and standards for urban areas where speed limits are below 60km/hr.

**6.2 Regional Policy**

**Limerick Shannon Metropolitan Area Transport Strategy**

The vision for Revised Draft LSMATS is to deliver a high-quality, accessible, integrated and more sustainable transport network that supports the role of the Limerick Shannon Metropolitan Area as the major growth engine of the Mid-West Region, an internationally competitive European city region and main international entry to the Atlantic Corridor. Cycling is a low cost, sustainable and growing mode of transport. Limerick City has a lot of untapped potential to become a haven for cyclists with its flat topography, compact design and the fact that a journey from the City Centre to the urban edge can be undertaken in less than 30-mins.

**Limerick 2030 Vision: An Economic and Spatial Plan for Limerick**

The plan sets out a clear framework that integrates economic development with spatial planning, all underpinned by dedicated bespoke marketing. It has the support of all the major public and private stakeholders in Limerick.

**6.3 Local Policy**

**Limerick Development Plan, 2022-2028:**

The Development Plan sets out the following policies and objectives with respect to acceptable development at the locations in question:

**Objective TR O2     Design Manual for Urban Roads and Streets**

It is an objective of the Council to support the appropriate road design standards of all roads and streets within the urban areas, including suburbs, towns and villages within the 60km/h zone as per the Design Manual for Urban Roads and Streets and TII Publication Standards DNGEO-03084 The Treatment of Transition Zones to Towns and Villages on National Roads

**Objective TR O5     Limerick – Shannon Metropolitan Area Transport Strategy**

It is an objective of the Council to facilitate the implementation and delivery of the proposals that will be contained in the final Limerick Shannon Metropolitan Area Transport Strategy, in conjunction with the National Transport Authority, Transport Infrastructure Ireland and Clare County Council and other relevant stakeholders. This partnership will achieve successful integration between land use and transport planning, and targeted growth along high quality public transport corridors and sustainable higher densities.

#### **Objective TR O6 Delivering Modal Split**

It is an objective of the Council to:

- a) Promote a modal shift away from the private car towards more sustainable modes of transport including walking, cycling, carpool and public transport in conjunction with the relevant transport authorities;
- b) Support investment in sustainable transport infrastructure that will make walking, cycling, carpool and public transport more attractive, appealing and accessible for all.

#### **Objective TR O7 Behavioural Change Measures**

It is an objective of the Council to: a) Continue to implement behavioural change initiatives and ‘softer measures’ aimed at enabling and promoting sustainable travel across Limerick’s workplaces, campuses, schools and communities as identified in LSMATS; b) Facilitate and implement school streets and school zones, including slow zones around schools, park and stride facilities and promote and facilitate active travel options for school children, to reduce the health and safety risks associated with traffic congestion, pollution and inactive lifestyles.

#### **Objective TR O8 Walking and Cycling Infrastructure**

It is an objective of the Council to:

- a) Improve and provide clear, safe and direct pedestrian linkages, cycle networks, including the greenways and primary segregated cycle routes, between the employment zones, shopping areas and residential areas throughout Limerick;
- b) Maintain and expand the pedestrian route network, infrastructure and where possible, retrofit cycle and pedestrian routes into the existing urban road network, to provide for accessible safe pedestrian routes within Limerick.

#### **Objective TR O9 Limerick Cycle Network**

It is an objective of the Council to implement in full, the Cycle Network, which will be set out in the final LSMATS, with priority given in the short term to delivering the primary cycle network and cycle routes serving schools.

#### **Objective TR O42 Roads and Streets**

It is an objective of the Council to secure improvements to the road network in Limerick, including improved pedestrian and cycle facilities, in conjunction and co-operation with relevant stakeholders, subject to resources becoming available.

#### **Objective SCSI O4 Ten - Minute Neighbourhood**

It is an objective of the Council to implement a strategy based on the sustainable compact settlements concept ‘10-minute city and town’, whereby, a range of community facilities and services are accessible in short walking and cycle timeframes from homes, or are accessible by high quality public transport services by connecting people to larger scaled settlements delivering these services.

#### **Objective CAF O20**

#### **Flood Risk Assessments**

It is an objective of the Council to require a Site-Specific Flood Risk Assessment (FRA) for all planning applications in Flood Zones A and B and consider all sources of flooding (for example coastal/tidal, fluvial, pluvial or groundwater), where deemed necessary. The detail of these Site-Specific FRAs (or commensurate assessments of flood risk for minor developments) will depend on the level of risk and scale of development. The FRA will be prepared taking into account the requirements laid out in the SFRA, and in particular in the Plan Making Justification Tests as appropriate to the particular development site. A detailed Site-Specific FRA should quantify the risks, the effects of selected mitigation and the management of any residual risks. The assessments shall consider and provide information on the implications of climate change with regard to flood risk in relevant locations.

**Objective IN O1      Climate Action in Infrastructure Planning**

It is an objective of the Council to: a) Require all infrastructure development, whether above ground or subterranean, to avoid flood risk areas and areas at risk of coastal erosion. b) Require site selection, location, design and materials to have regard to and be resilient to the changing climate (high winds, temperature fluctuations, increased storm intensity and changes in rainfall). c) Collaborate with utility and service providers to ensure their networks are resilient to the impacts of climate change, both in terms of design and ongoing maintenance.

**Objective 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.

**Objective EH O36    Preservation of the Archaeological Heritage**

It is an objective of the Council to seek the preservation of all known sites and features of historical and archaeological interest. This is to include all the sites listed in the Record of Monuments and Places as established under Section 12 of the National Monuments (Amendment) Act 1994. The preferred option is preservation in situ, or at a minimum preservation by record.

**Objective EH 08    Roosting Habits**

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.

**Objective EH O10    Trees and Hedgerows**

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 etc

**Objective 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.

**Objective HO O3 Protection of Existing Residential Amenity**

It is an objective of the Council to ensure a balance between the protection of existing residential amenities, the established character of the area and the need to provide for sustainable new development.

**Policy 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.

**Policy CAF P5 Managing Flood Risk**

It is a policy of the Council to protect Flood Zone A and Flood Zone B from inappropriate development and direct developments/land uses into the appropriate lands, in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009 (or any subsequent document) and the guidance contained in Development Management Standards and the Strategic Flood Risk Assessment (SFRA). Where a development/land use is proposed that is inappropriate within the Flood Zone, but that has passed the Plan Making Justification Test, then the development proposal will need to be accompanied by a Development Management Justification Test and Site-Specific Flood Risk Assessment in accordance with the criteria set out under The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009 and Circular PL2/2014 (and any subsequent updates) etc.

**Policy TR P3 Integration of Land Use and Transport Policies.**

It is a policy of the Council to support and facilitate the integration of land use and transportation policies ensuring the delivery of sustainable compact settlements served by sustainable modes of transport.

## Policy TR P4 Promotion of Sustainable Patterns of Transport Use

It is a policy of the Council to seek to implement in a positive manner, in cooperation with other relevant authorities and agencies, the policies of the NPF, RSES and the Department of Transport's Smarter Travel, A Sustainable Transport Future 2009 – 2020 (and any subsequent updates), to encourage more sustainable patterns of travel and greater use of sustainable forms of transport, including public transport, cycling and walking.

## Policy TR P5 Sustainable Mobility and Regional Accessibility

It is a policy of the Council to support sustainable mobility, enhanced regional accessibility and connectivity within Limerick, in accordance with the National Strategic Outcomes of the National Planning Framework and the Regional Spatial and Economic Strategy for the Southern Region.

## **Policy TR P6 Delivery of Transport Infrastructure in line with National Policy**

It is a policy of the Council to support the delivery of transport infrastructure identified within the National Planning Framework, National Development Plan 2021-2030 (and any update) and the Regional Spatial and Economic Strategy for the Southern Region and to support enhanced connectivity within Limerick and inter-urban connectivity within the regions.

Policy TR P7 Sustainable Travel and Transport

It is a policy of the Council to support, facilitate and co-operate with relevant agencies to secure sustainable travel within Limerick and seek to implement the 10-minute city/town concept, promote compact growth and reduce the need for long distance travel, as a means to reduce the impact of climate change.

## Objective TR O42 Roads and Streets

It is an objective of the Council to secure improvements to the road network in Limerick, including improved pedestrian and cycle facilities, in conjunction and co-operation with relevant stakeholders, subject to resources becoming available.

## Policy CS P6 LSMATS

It is a policy of the Council to ensure that the Core Strategy is in line with the objectives of the final LSMATS and the integration of land use planning and transport in reducing the need to travel and promote modal shift from the use of the private car.

## **7.0 Summary of key planning issues:**

### **7.1 Introduction**

The proposal is to upgrade cycling facilities and cyclist/pedestrian crossing facilities along the R526 St. Nessan's Road from Saint Pauls Roundabout to Ballykeeffee Roundabout and the works will include segregated cycle lanes, shared carriageway and footpath upgrades/reconstruction on the R526. This cycle lane project is based on the recommendations of the Limerick Metropolitan Cycle Network Study (LMCNS) which identified this route as part of the primary cycle network.

### **7.2 Principle of Development**

The key aim of the proposal is to improve road safety for vulnerable cyclists and pedestrians through the provision of dedicated cycle facilities and the upgrading of footpaths, improved junction arrangements and upgraded and additional crossing points. As set out in this report, the proposed scheme has strong national, regional, and local planning policy support. This includes the National Planning Framework, Limerick Shannon Metropolitan Area Transport Strategy (LSMATS), the Limerick Development Plan, (2022-2028) and Limerick Metropolitan Cycle Network Plan. The primary purpose of the development as clearly set out in the Planning Report prepared by MRG consulting Engineers, is to provide a suitable road arrangement that will accommodate existing and future pedestrian, cycle and vehicular traffic along St. Nessan's Road. It will also continue the permitted works to provide a suitable link from the city centre to Dooradoyle/Raheen and beyond. This approach is considered to be in line with the requirements set out in LSMATS. The Executive is satisfied that the proposed use is in line with Policy TR P4 Promotion of Sustainable Patterns of Transport Use, Policy TR P5 Sustainable Mobility and Regional Accessibility, Policy TR P6 Delivery of Transport Infrastructure in line with National Policy and Policy TR P7 Sustainable Travel and Transport as set out in the Limerick Development, 2022-2028.

### **7.3 Flood Risk**

A section of the site is located in Flood Zone A. A Site Specific Flood Risk Assessment has been prepared in support of the proposed development by MRG Consulting Engineers. The proposed cycle route has been assessed in accordance with the 'The Planning System and Flood Risk Management' Guidelines and the Limerick Development Plan, 2022-2028. CFRAMS Flood Extent Maps were consulted to establish the Flood Zone. It was determined that the proposed cycle route is located in Flood Zone A for coastal flooding. The proposed cycle route is classified as a Water Compatible Development under 'The Planning System and Flood Risk Management Guidelines' and as such is considered appropriate in this location. The Site Specific Flood Risk Assessment considers the development to be appropriate at this location and concludes that the proposed development will not increase flood risk elsewhere. The Executive is satisfied that the development is in line with Objective CAF O20 Flood Risk Assessments and Objective IN O1 Climate Action in Infrastructure Planning as set out in the Limerick Development, 2022-2028.

## **7.4 Transport & Mobility**

### **7.4.1 Existing Traffic & Network Conditions**

The entire route has a 50km/hr speed zone designation. The Planning Report prepared by MRG Consulting Engineers indicates that the scheme has been designed to improve road safety for vulnerable cyclists through the provision of dedicated cycle facilities which are mostly segregated from traffic through the provision of an upstand kerb. There is an existing cycle lane along the proposed route. The Part 8 proposes the creation of a dedicated 1.75m clear width one-way segregated cycle track on the south side of St. Nesson's Road, R526 and a 2.75m clear width two-way track on the north side of the road between the St. Paul's and Ballykeeffe roundabouts. The route will link with Fr. Russell Road and beyond and the South Circular Road into the City Centre. The proposal is considered to be a significant improvement to the current cycling facilities in place and would allow people to travel in a much safer environment, which in turn is anticipated to encourage people to cycle. There are no on street car parking spaces proposed for removal. The Executive considers that the proposed development which seeks to encourage modal shift and behavioural change regarding transport by allowing people to travel on foot or bicycle in a much safer manner is in line with Objectives TR O6, TR O7, TR O8 and TR O9 as set out in the Limerick Development Plan, 2022-2028.

### **7.4.2 Road Safety Issues**

A Road Safety Audit was carried out by Roadplan Consulting during the preliminary design stage of the proposal and any recommendations made in the report informed the design proposed. The Executive considers that the proposed development is in line with Objectives TR O6, TR O7, TR O8 & TR O9 as set out in the Limerick Development, 2022-2028.

## **7.5 Architectural Impact**

The proposed route does not pass through any Architectural Conservation Area (ACA) and no Protected Structure will be impacted by the development.

## **7.6 Archaeology Impact**

The Planning Report prepared by MRG Consulting Engineers states that there are no known archaeological sites or monuments within the proposed route. The Executive is satisfied that the development is therefore in line with Objective EH O36 Preservation of the Archaeological Heritage, Objective EH O39 Protection of the setting of Archaeological Monuments and Objective EH O40 Proper procedures during the planning process as set out in the Limerick Development, 2022-2028.

## **7.7 Conservation Impact – Impact on Bats**

A Bat Roost Assessment was prepared by MEC Ltd. 11 trees are proposed for removal on St. Nesson's Road R526, 7 trees are proposed for removal on the R926 Dooradoyle Road and 3 trees within the private grounds of St. Pauls Nursing Home to facilitate the design. No tree proposed for removal supports a bat roost. The removal as part of the scheme is therefore considered acceptable. The proposal includes for a number of bat boxes to be installed along the route in suitable locations to support the local bat population. The Executive is satisfied that the development is therefore in line with Objective EH 08 – Roosting Habits as set out in the Limerick Development, 2022-2028.

## 7.8 Landscaping

The proposal includes a detailing landscaping plan that proposes a host of additional landscaping features along the route that include tree planting, rain gardens, wildflower meadows, grass/lawns, hedges, planers and bulbs. This is considered to be a significant benefit of the scheme and will improve the route and area through the introduction green infrastructure and adding biodiversity benefit set out in the Planning Report and Landscaping Plans submitted. The Executive is satisfied that the development is therefore in line with Objective EH O10 Trees and Hedgerows and Objective EH O7 All Ireland Pollinator Plan as set out in the Limerick Development, 2022-2028.

## 8.0 Recommendation

Having regard to the foregoing evaluation and the reasons and considerations as set out, the Chief Executive is satisfied that the proposal is in accordance with the objectives of the Limerick Development Plan, 2022-2028 and the proper planning and sustainable development of the area. Pursuant to to Section 179 3(a) of the Planning & Development Act 2000 (as amended) this the proposed development is recommended to the Elected Members of Limerick City & County Council for their approval.



**Dr. Pat Daly**  
**Chief Executive**  
**Limerick City & County Council**

Date: 12.1.2024

