F7

COMHAIRLE CATHRACH & CONTAE Luimnigh Limerick CITY & COUNTY COUNCIL

LIMERICK CITY & COUNTY COUNCIL

PLANNING AND ENVIRONMENTAL SERVICES

SECTION 5 APPLICATION

DECLARATION ON DEVELOPMENT AND EXEMPTED DEVELOPMENT

Applicant's Name: _____

Applicant's Address: _____

_____

_____

Telephone No. [redacted]

Name of Agent (if any): _____

Address: _____

_____

_____

Telephone No. _____

Address for Correspondence:

_____

_____

_____

Location of Proposed development:

_____

_____

_____

Description of Proposed development:

_____

_____

_____

_____

Is this a Protected Structure or within the curtilage of a Protected Structure. YES/NO

Applicant's interest in site:_____

List of plans, drawings, etc. submitted with this application:

_____

_____

_____

_____

Have any previous extensions/structures been erected at this location YES/NO

If Yes please provide floor areas of all existing structures:

_____

_____

_____

_____

Signature of Applicant (or Agent) _____

NOTES: Application must be accompanied by:

(a) Fee of €80
(b) Site location map
(c) Site layout plan
(d) Dimensioned plans and elevations of the structure and any existing structures.
(e) Where the declaration is in respect of a farm building, a layout identifying the use of each existing building together with floor area of each building.

****

Application to be forwarded to:

Limerick City & County Council,
Planning and Environmental Services,
City & County Council Offices,
Dooradoyle Road,
Limerick.

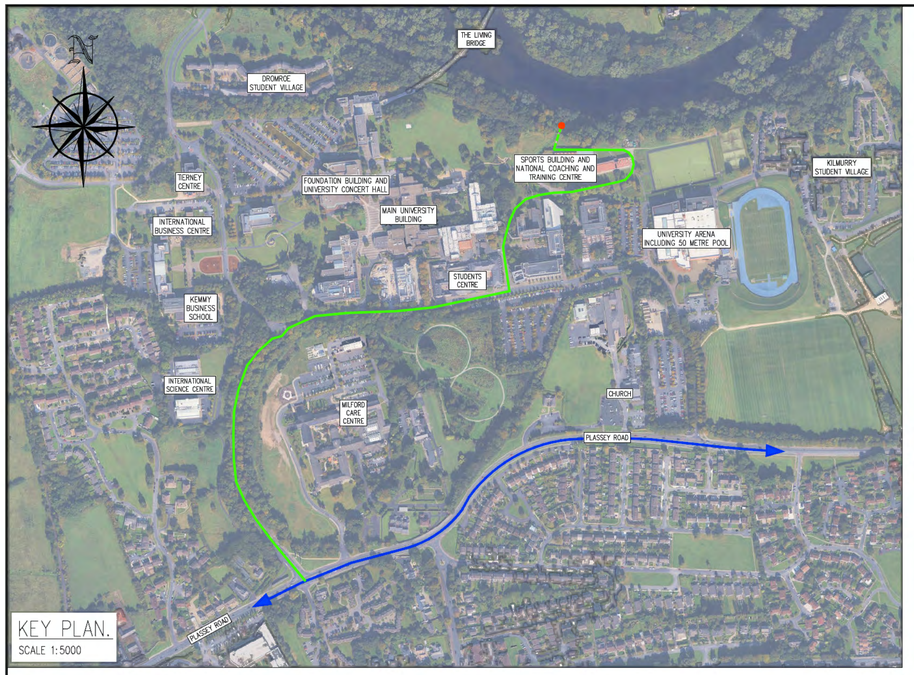
****

OFFICE USE ONLY

Ref. No. _____ Date Received _____

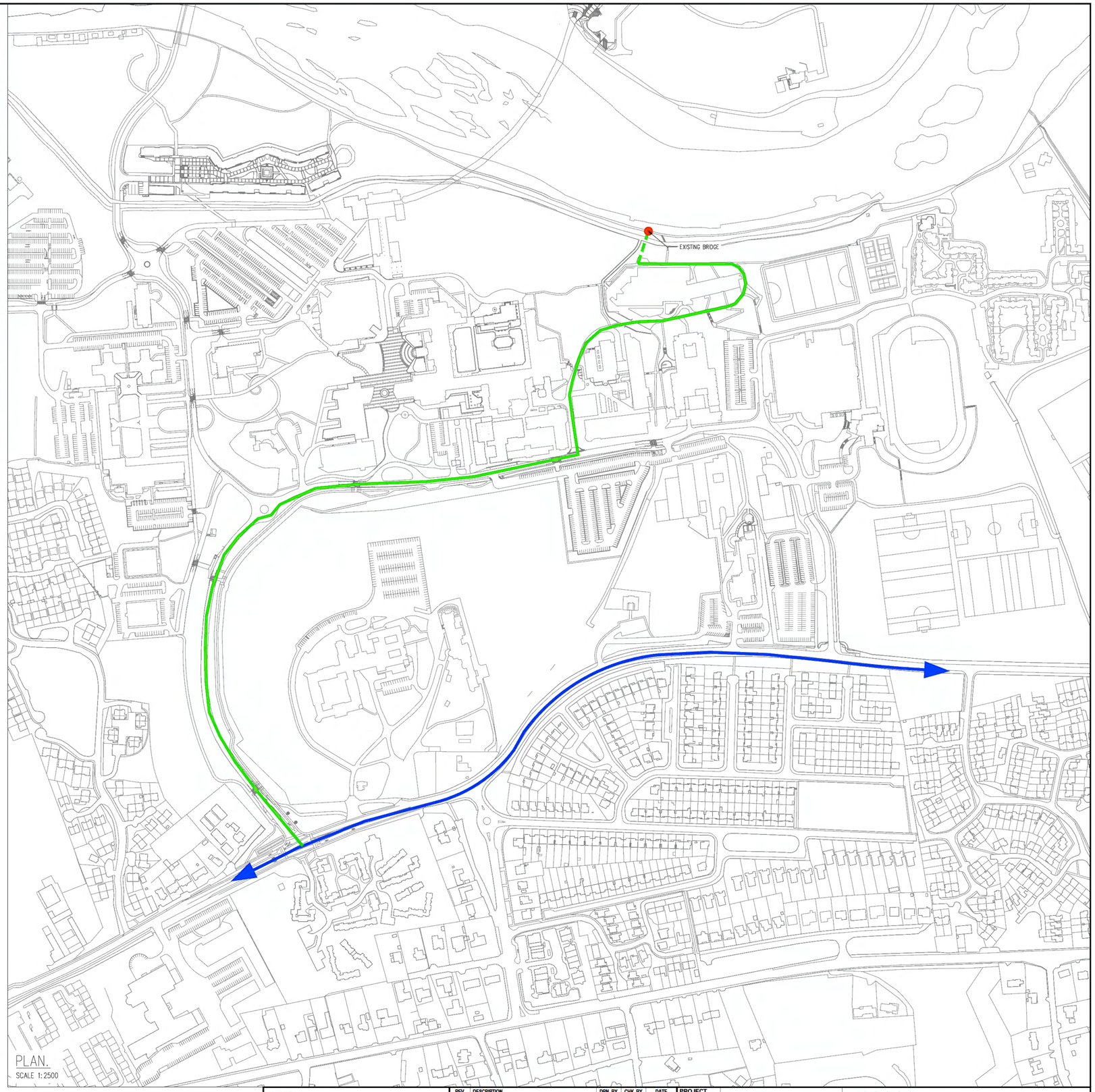
Fee Received _____ Date Due _____

****



KEY PLAN.
SCALE 1:5000

LEGEND.
- PROPOSED ACCESS ROUTE – VEHICLE ACCESS
- PROPOSED ACCESS ROUTE – PEDESTRIAN ACCESS
- PUBLIC ACCESS ROAD – PLASSEY PARK ROAD



PLAN.
SCALE 1:2500

PLANNING DRAWING
NOT FOR CONSTRUCTION.
ALL LEVELS GIVEN ARE RELATIVE TO ORDNANCE DATUM.
THIS DRAWING HAS BEEN ISSUED FOR INFORMATION PURPOSES ONLY AND MUST NOT BE USED FOR CONSTRUCTION UNDER ANY CIRCUMSTANCES.

NOTES
1. For setting out refer to Architect's drawings.
2. This drawing to be read in conjunction with all other Architectural and Engineering drawings and all other relevant drawings and Specifications.
3. DO NOT SCALE THIS DRAWING. Use figured dimensions only.
4. No part of this document may be reproduced or transmitted in any form or stored in any retrieval system of any nature without the written permission as copyright holder except as agreed for use on the project for which the document was originally issued.
5. Ordnance Survey Ireland Licence Number EN 0074025.

REV	DESCRIPTION	DRN. BY	CHK. BY	DATE

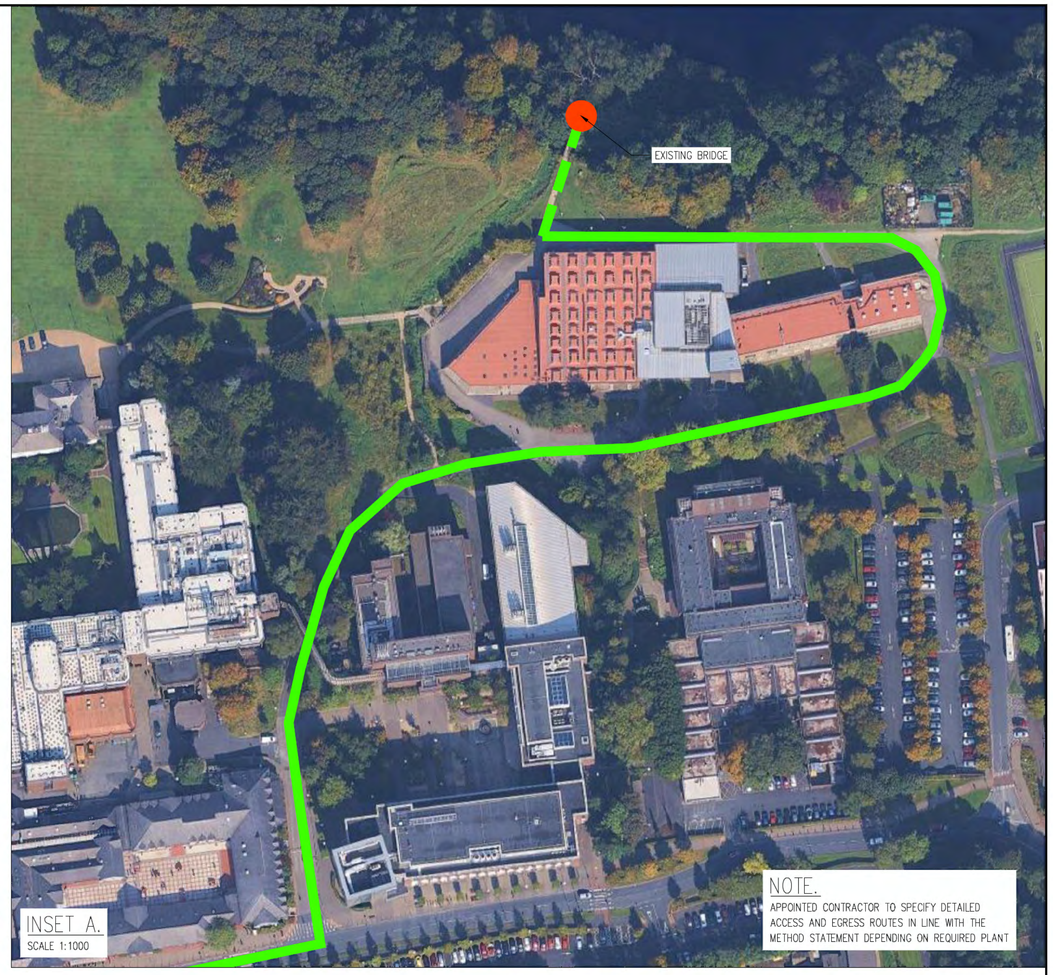
PROJECT	MILLSTREAM BRIDGE
CLIENT	UNIVERSITY LIMERICK
JOB No.	U087L
DRAWING No.	U087L-CSC-XX-ZZ-DR-C-0100
STATUS	PLANNING
TITLE	SITE LOCATION

CS CONSULTING
Civil , Structural & Traffic Engineering
Head Office: 19-22 Dame Street Dublin 2.
t: +353 (0)1 5480563 e: info@csconsulting.ie w: www.csconsulting.ie

DRAWN BY	CHECKED BY	REVISION
SC	LMcN	P01
	SCALE	DATE
	1:2500 @ A1	AUG. '25

KEY PLAN.
SCALE 1:2500

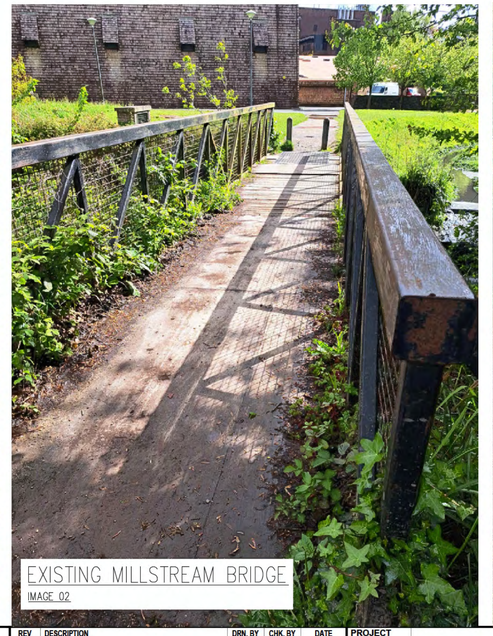
LEGEND.
- PROPOSED ACCESS ROUTE – VEHICLE ACCESS
- PROPOSED ACCESS ROUTE – PEDESTRIAN ACCESS
- PUBLIC ACCESS ROAD – PLASSEY PARK ROAD



INSET A.
SCALE 1:1000

NOTE.
APPOINTED CONTRACTOR TO SPECIFY DETAILED ACCESS AND EGRESS ROUTES IN LINE WITH THE METHOD STATEMENT DEPENDING ON REQUIRED PLANT

EXISTING MILLSTREAM BRIDGE
IMAGE 01



EXISTING MILLSTREAM BRIDGE
IMAGE 02

EXISTING MILLSTREAM BRIDGE
IMAGE 03

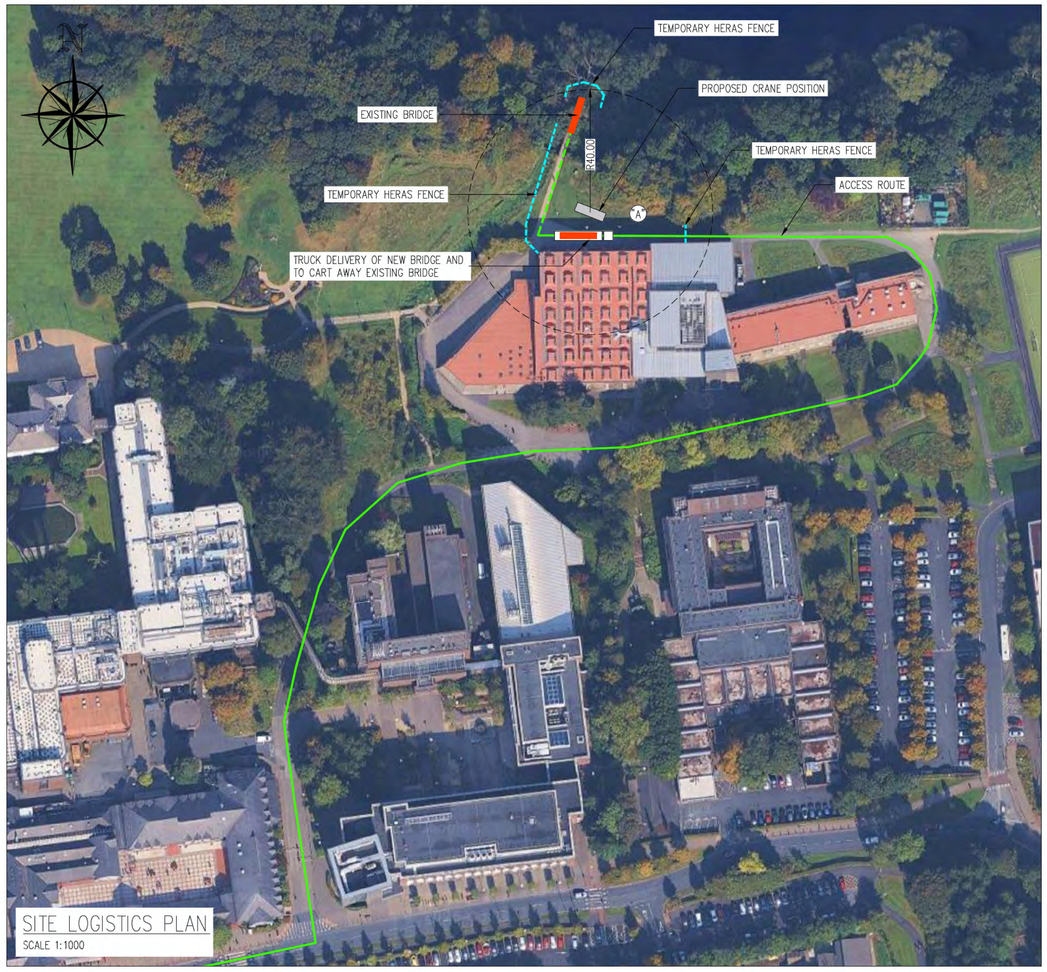
PLANNING DRAWING
NOT FOR CONSTRUCTION.
ALL LEVELS GIVEN ARE RELATIVE TO ORDNANCE DATUM.
THIS DRAWING HAS BEEN ISSUED FOR INFORMATION PURPOSES ONLY AND MUST NOT BE USED FOR CONSTRUCTION UNDER ANY CIRCUMSTANCES.

NOTES
1. For setting out refer to Architect's drawings.
2. This drawing to be read in conjunction with all other Architectural and Engineering drawings and all other relevant drawings and Specifications.
3. DO NOT SCALE THIS DRAWING. Use figured dimensions only.
4. No part of this document may be reproduced or transmitted in any form or stored in any retrieval system of any nature without the written permission as copyright holder except as agreed for use on the project for which the document was originally issued.
5. Ordnance Survey Ireland Licence Number EN 0074025.

REV	DESCRIPTION	DRN. BY	CHK. BY	DATE

PROJECT	MILLSTREAM BRIDGE			
CLIENT	UNIVERSITY LIMERICK			
JOB No.	U087L			
DRAWING No.	U087L-CSC-XX-ZZ-DR-C-0101			
STATUS	PLANNING	DRAWN BY SC	CHECKED BY LMcN	REVISION P01
TITLE	PROPOSED ACCESS ROUTE		SCALE NTS @ A1	DATE AUG. '25

CS CONSULTING
Civil , Structural & Traffic Engineering
Head Office: 19-22 Dame Street Dublin 2.
t: +353 (0)1 5480563 e: info@csconsulting.ie w: www.csconsulting.ie



SITE LOGISTICS PLAN

SCALE 1:1000

LEGEND.

- PROPOSED ACCESS ROUTE – VEHICLE ACCESS
- PROPOSED ACCESS ROUTE – PEDESTRIAN ACCESS
- TEMPORARY HERAS FENCE

OUTLINE BRIDGE REPLACEMENT METHODOLOGY:

1. THE AREA IS CURRENTLY SECURED TO PREVENT MEMBERS OF THE PUBLIC CROSSING THE BRIDGE.
2. THE EXISTING STEEL BRIDGE IS BOLTED TO THE CONCRETE HEAD WALLS WITH CAST IN PLACE HOLDING DOWN DOWNS. IN ADVANCE OF THE NEW BRIDGE BEING DELIVERED TO SITE, THE EXISTING BOLT FIXINGS WILL BE REMOVED. IF THE CONDITION OF THE NUTS ARE IN POOR CONDITION THEY MAY NEED TO BE CUT ON SITE. THIS WILL BE COMPLETED IN A CONTROLLED MANOR.
3. ON THE DAY OF DELIVERY OF THE NEW STEEL BRIDGE. TEMPORARY HERAS FENCING WILL BE ERECTED TO SECURE THE WORKING AREA.
4. A LONG REACH MOBILE CRANE WILL BE DRIVEN INTO POSITION SET BACK FROM THE RIVER CHANNEL. PROTECTION MATS WILL BE USED TO PROVIDE A SOLID WORKING PLATFORM.
5. A DELIVERY TRUCK WILL BRING TO SITE THE FULLY ASSEMBLED NEW BRIDGE. THIS WILL BE UNLOADED ONTO A TEMPORARY TRANSITION AREA "A".
6. THE EXISTING BRIDGE WILL BE LIFTED AS ONE COMPLETE STRUCTURE ONTO THE BACK OF THE DELIVERY TRUCK.
7. THE NEW BRIDGE WILL BE LIFTED ONTO THE CONCRETE HEAD WALLS AND SECURED INTO POSITION USING THE EXISTING HOLDING DOWN BOLTS.
8. THE VEHICLES WILL LEAVE SITE WITH THE BRIDGE. THE AREA WILL BE MADE GOOD AND THE HERAS FENCING REMOVED.
9. IT IS ANTICIPATED THAT THESE WORKS WILL BE COMPLETED IN A SINGLE WORKING DAY.
10. THE FOLLOWING ANY TOUCH UP WORKS TO THE BRIDGE WILL BE COMPLETED. THE HERAS FENCE WILL BE REMOVED, GRASSED AREAS WILL BE MADE GOOD AND THE BRIDGE WILL BE OPEN FOR PUBLIC USE.
11. APPOINTED CONTRACTOR WILL PROVIDE A DETAIL METHODOLOGY FOR REPLACEMENT OF THE BRIDGE PRIOR TO COMMENCING ON SITE.

EXISTING MILLSTREAM BRIDGE

IMAGE 01

EXISTING CONCRETE HEAD WALLS SUPPORTING THE BRIDGE ON EITHER SIDE OF THE WATER CHANNEL.

PLANNING DRAWING
NOT FOR CONSTRUCTION.
ALL LEVELS GIVEN ARE RELATIVE TO ORDNANCE DATUM.
THIS DRAWING HAS BEEN ISSUED FOR INFORMATION PURPOSES ONLY AND MUST NOT BE USED FOR CONSTRUCTION UNDER ANY CIRCUMSTANCES.

NOTES

1. For setting out refer to Architect's drawings.
2. This drawing to be read in conjunction with all other Architectural and Engineering drawings and all other relevant drawings and Specifications.
3. DO NOT SCALE THIS DRAWING. Use figured dimensions only.
4. No part of this document may be reproduced or transmitted in any form or stored in any retrieval system of any nature without the written permission as copyright holder except as agreed for use on the project for which the document was originally issued.
5. Ordnance Survey Ireland Licence Number EN 0074025.

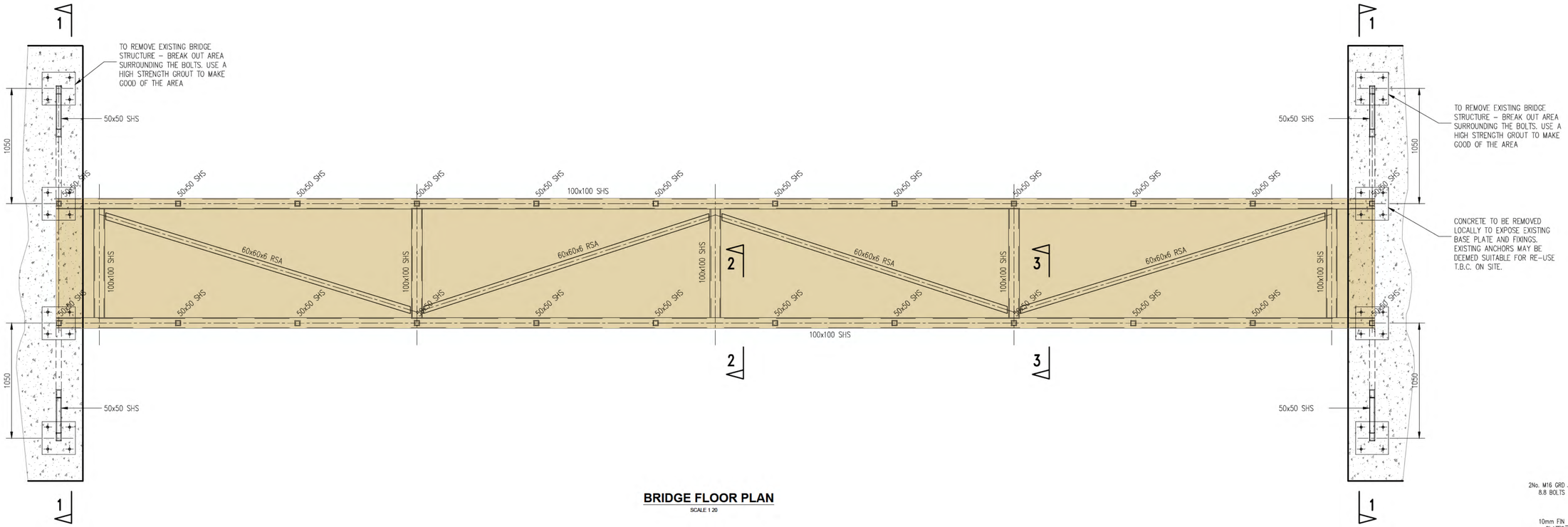
REV	DESCRIPTION	DRN. BY	CHK. BY	DATE
T01	ISSUED FOR INFORMATION	EB	LMcN	24/11/2025

PROJECT	MILLSTREAM BRIDGE
CLIENT	UNIVERSITY LIMERICK
JOB No.	U087L
DRAWING No.	U087L-CSC-XX-ZZ-DR-C-0102
STATUS	PLANNING
TITLE	BRIDGE REPLACEMENT METHODOLOGY

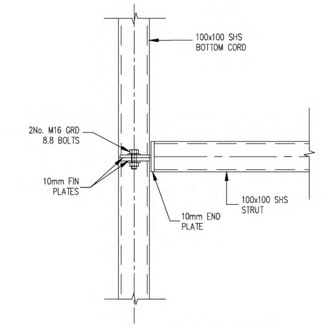
CS CONSULTING
Civil , Structural & Traffic Engineering
Head Office: 19-22 Dame Street Dublin 2.
t: +353 (0)1 5480663 e: info@csconsulting.ie w: www.csconsulting.ie

DRAWN BY	CHECKED BY	REVISION
SC	LMcN	T01
	SCALE	DATE
	NTS @ A1	AUG. '25

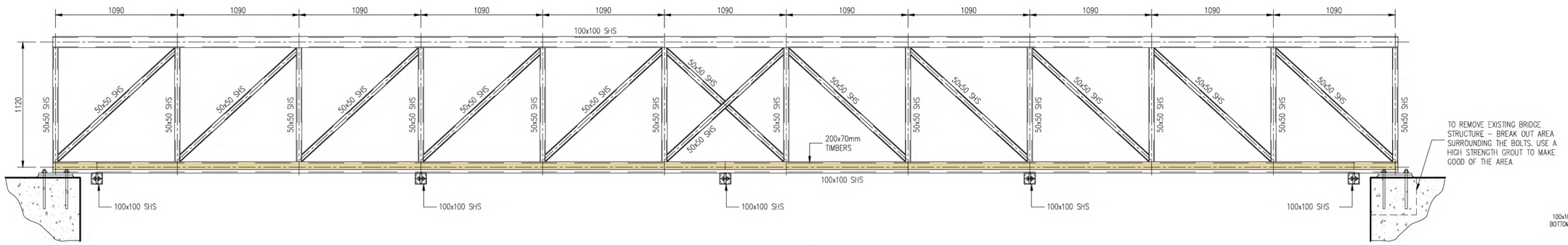
Last saved by: Erika Barrosa (24/11/2025) Last Plotted: 24/11/2025 File Location: z:\U_JOBS\Job-U087L\A_DRAWINGS\U087L-CSC-XX-ZZ-DR-C-0102 Bridge Replacement.dwg



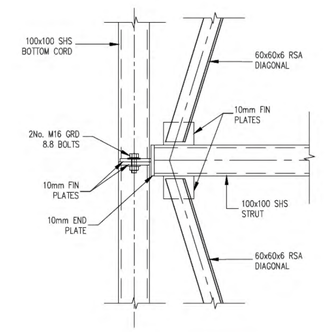
BRIDGE FLOOR PLAN
SCALE 1:20



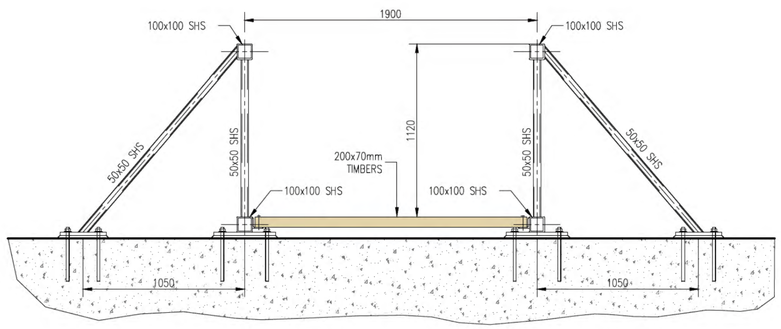
2a SECTION
SCALE 1:10



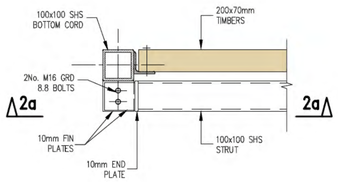
BRIDGE TRUSS ELEVATION
SCALE 1:20



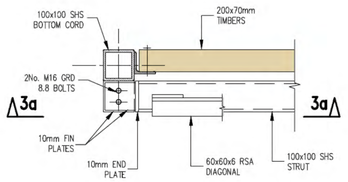
3a SECTION
SCALE 1:10



1 SECTION
SCALE 1:20



2 SECTION
SCALE 1:10



3 SECTION
SCALE 1:10

PLANNING DRAWING
NOT FOR CONSTRUCTION.
ALL LEVELS GIVEN ARE RELATIVE TO ORDNANCE DATUM.
THIS DRAWING HAS BEEN ISSUED FOR INFORMATION PURPOSES ONLY AND MUST NOT BE USED FOR CONSTRUCTION UNDER ANY CIRCUMSTANCES.

NOTES
1. For setting out refer to Architect's drawings.
2. This drawing to be read in conjunction with all other Architectural and Engineering drawings and all other relevant drawings and Specifications.
3. DO NOT SCALE THIS DRAWING. Use figured dimensions only.
4. No part of this document may be reproduced or transmitted in any form or stored in any retrieval system of any nature without the written permission as copyright holder except as agreed for use on the project for which the document was originally issued.
5. Ordnance Survey Ireland Licence Number EN 0074025.

REV	DESCRIPTION	DRN. BY	CHK. BY	DATE

PROJECT	MILLSTREAM BRIDGE			
CLIENT	UNIVERSITY LIMERICK			
JOB No.	U087L			
DRAWING No.	U087L-CSC-XX-ZZ-DR-S-0500			
STATUS	Planning	DRAWN BY GS	CHECKED BY LMcN	REVISION P01
TITLE	EXISTING BRIDGE - PLAN, ELEVATION & DETAILS		SCALE as shown @ A1	DATE AUGUST 2025

CS CONSULTING
Civil , Structural & Traffic Engineering
Head Office: 19-22 Dame Street Dublin 2.
t: +353 (0)1 5460363 e: info@csconsulting.ie w: www.csconsulting.ie

PHOTO 01

PHOTO 02

PHOTO 03

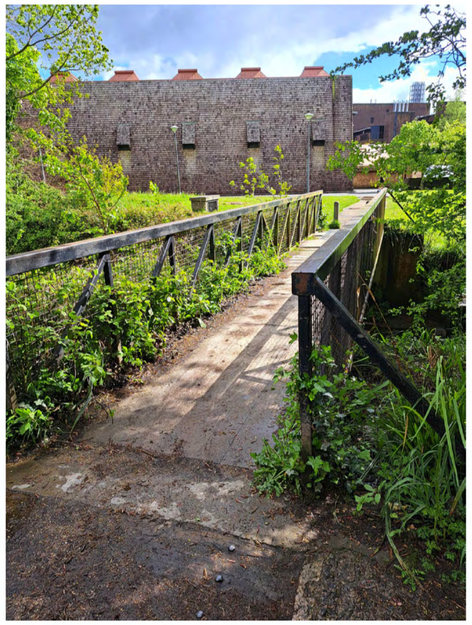


PHOTO 04

PHOTO 05

PHOTO 06

PHOTO 07

PHOTO 08

PLANNING DRAWING
NOT FOR CONSTRUCTION.
ALL LEVELS GIVEN ARE
RELATIVE TO ORDNANCE DATUM.
THIS DRAWING HAS BEEN ISSUED FOR INFORMATION PURPOSES ONLY AND MUST NOT BE USED FOR CONSTRUCTION UNDER ANY CIRCUMSTANCES.

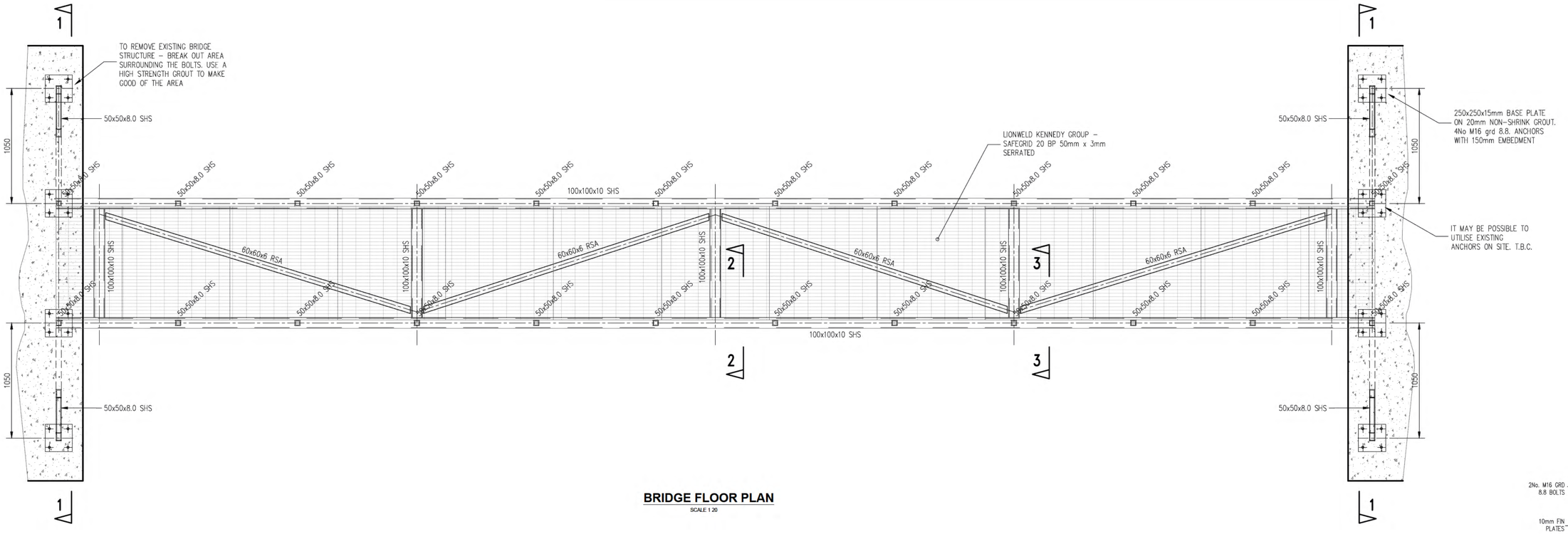
NOTES
1. For setting out refer to Architect's drawings.
2. This drawing to be read in conjunction with all other Architectural and Engineering drawings and all other relevant drawings and Specifications.
3. DO NOT SCALE THIS DRAWING. Use figured dimensions only.
4. No part of this document may be reproduced or transmitted in any form or stored in any retrieval system of any nature without the written permission as copyright holder except as agreed for use on the project for which the document was originally issued.
5. Ordnance Survey Ireland Licence Number EN 0074025.

REV	DESCRIPTION	DRN. BY	CHK. BY	DATE

PROJECT	MILLSTREAM BRIDGE
CLIENT	UNIVERSITY LIMERICK
JOB No.	U087L
DRAWING No.	U087L-CSC-XX-ZZ-DR-S-0501
STATUS	STATUS D2 - Suitable for Tender
TITLE	EXISTING BRIDGE - PHOTOS

CS CONSULTING
Civil , Structural & Traffic Engineering
Head Office: 19-22 Dame Street Dublin 2.
t: +353 (0)1 5460563 e: info@csconsulting.ie w: www.csconsulting.ie

DRAWN BY	CHECKED BY	REVISION
GS	LMcN	P01
	SCALE	DATE
	NTS @ A1	AUGUST 2025



BRIDGE FLOOR PLAN

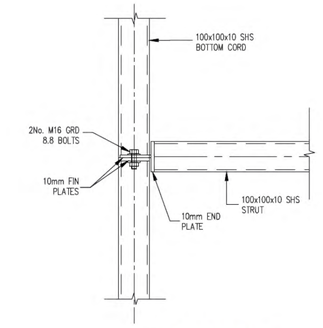
SCALE 1:20

STEELWORK NOTES:

1. ALL STEELWORK TO BE IN ACCORDANCE WITH THE NATIONAL STRUCTURAL STEELWORK SPECIFICATION (N.S.S.S.).
2. STEELWORK GRADE S355 TO BS EN 10025 UNLESS NOTED OTHERWISE. EXTERNAL STEEL TO BE S355 UNLESS NOTED OTHERWISE. ALL HOLLOW SECTIONS TO BE HOT FINISHED UNLESS NOTED OTHERWISE.
3. ALL EXTERNAL BOLTS, NITS AND WASHERS TO BE STAINLESS STEEL WITH EPDM ISOLATING WASHERS.
4. CORROSION PROTECTION OF STEELWORK:

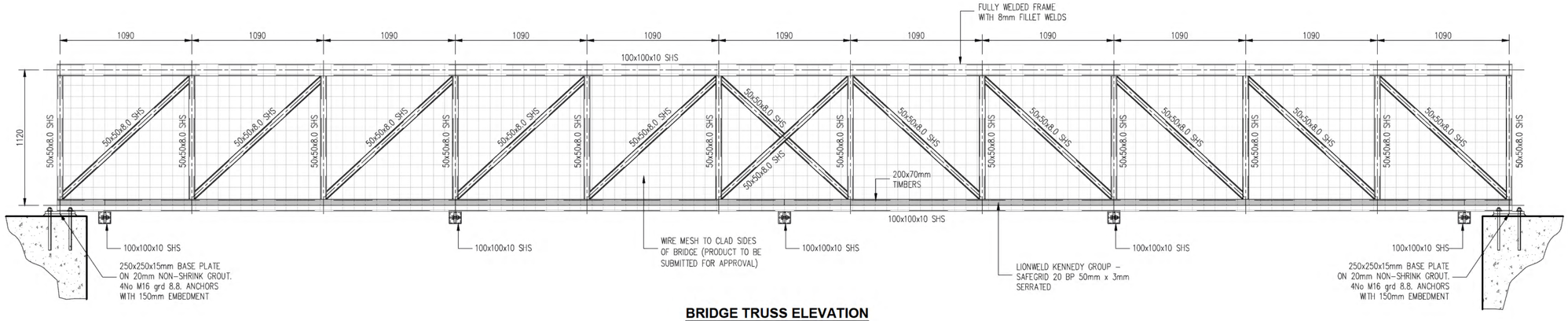
EXTERNAL STEELWORK – STEELWORK TO BE SHOT BLASTED TO SWEDISH STANDARD SA2.5 AND HOT DIP GALVANIZED TO 140 MICRONS.

5. FINISHING COAT TO BE AGREED.
6. ALL DIMENSIONS TO BE MEASURED ON SITE PRIOR TO FABRICATION.



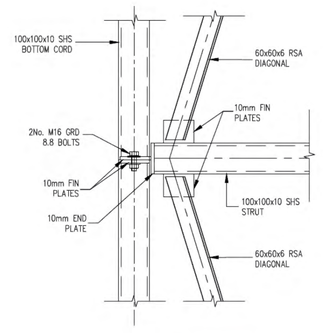
2a SECTION

SCALE 1:10



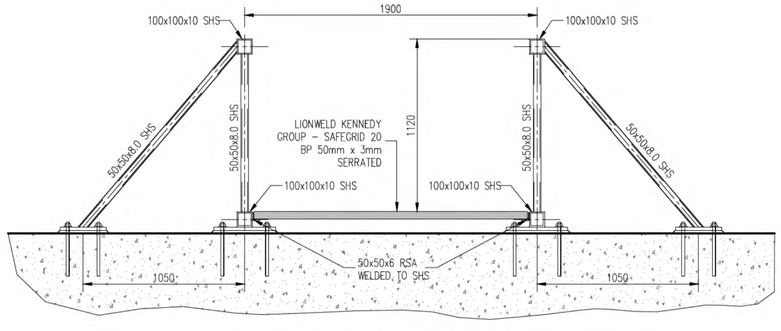
BRIDGE TRUSS ELEVATION

SCALE 1:20



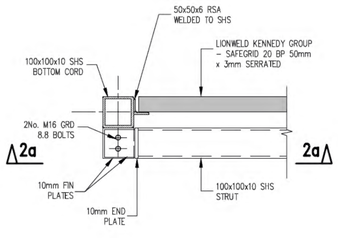
3a SECTION

SCALE 1:10



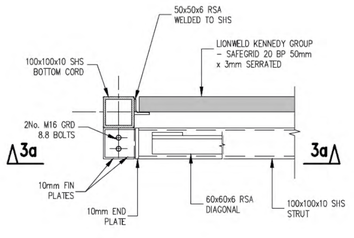
1 SECTION

SCALE 1:20



2 SECTION

SCALE 1:10



3 SECTION

SCALE 1:10

PLANNING DRAWING
NOT FOR CONSTRUCTION.
ALL LEVELS GIVEN ARE RELATIVE TO ORDNANCE DATUM.
THIS DRAWING HAS BEEN ISSUED FOR INFORMATION PURPOSES ONLY AND MUST NOT BE USED FOR CONSTRUCTION UNDER ANY CIRCUMSTANCES.

NOTES
1. For setting out refer to Architect's drawings.
2. This drawing to be read in conjunction with all other Architectural and Engineering drawings and all other relevant drawings and Specifications.
3. DO NOT SCALE THIS DRAWING. Use figured dimensions only.
4. No part of this document may be reproduced or transmitted in any form or stored in any retrieval system of any nature without the written permission as copyright holder except as agreed for use on the project for which the document was originally issued.
5. Ordnance Survey Ireland Licence Number EN 0074025.

REV	DESCRIPTION	DRN. BY	CHK. BY	DATE

PROJECT	MILLSTREAM BRIDGE
CLIENT	UNIVERSITY LIMERICK
JOB No.	U087L
DRAWING No.	U087L-CSC-XX-ZZ-DR-S-0502
STATUS	STATUS D2 - Suitable for Tender
TITLE	NEW BRIDGE - PLAN, ELEVATION & DETAILS

CS CONSULTING
Civil , Structural & Traffic Engineering
Head Office: 19-22 Dame Street Dublin 2
t: +353 (0)1 5490363 e: info@csconsulting.ie w: www.csconsulting.ie

DRAWN BY	CHECKED BY	REVISION
GS	LMcN	P01
	SCALE	DATE
	as shown @ A1	AUGUST 2025

CS CONSULTING
Civil, Structural & Traffic Engineering

The Secretary
Planning Environment & Planning Making
Limerick City & County Council
Dooradoyle, Limerick

Sent By: Post
Job Ref: U087L
A - LMcN
Date: 29-Jul-25

RE: Millstream Bridge Replacement, University of Limerick – Section 5 Application

Dear Sir/Madam

We enclose herewith section 5 application for the replacement of an existing pedestrian foot bridge at the University of Limerick.

We are of the opinion that the proposed development is exempted development for the following reasons:

- *The development falls under Class 13 of Part 1 of Schedule 2 of the Planning and Development Regulations 2001, The repair or improvement of any private street, road or way, being works carried out on land within the boundary of the street, road or way, and the construction of any private footpath or paving. The width of any such private footpath or paving shall not exceed 3 metres*

- An appropriate assessment screening report carried out on the proposed bridge replacement has concluded that the proposed work will not have a significant effect on any European sites and therefore a Natura Impact Assessment is not required.

We therefore enclose the following:

- Application form F7;
- Receipt for fee;
- Drawings:
  - Site Location Map & Site Plan U087L-CSC-XX-ZZ-DR-0100

- Proposed Access Route U087L-CSC-XX-ZZ-DR-0101
- Existing Bridge Plans & Sections U087L-CSC-XX-ZZ-DR-0500
- Existing Bridge Photos U087L-CSC-XX-ZZ-DR-0501
- New Bridge Plans & Sections U087L-CSC-XX-ZZ-DR-0502

- Appropriate Assessment Screening Report.

We look forward to hearing from you in due course.

Yours sincerely

Luke McNamee

Director

BSc (Eng), CEng, BSc CIOB, MIEI, MIStructE

for Cronin & Sutton Consulting

Proposed Replacement of the Mill Stream Pedestrian Bridge at the University of Limerick Campus

APPROPRIATE ASSESSMENT SCREENING REPORT

Environmental Assessment

Built Environment

Client: **University of Limerick**

Date: **28 July 2025**

DOCUMENT CONTROL SHEET

7024_PESS Bridge_AASR01_Appropriate Assessment Screening Report

Project No.	7024
Client:	University of Limerick
Project Name:	Proposed Replacement of the Mill Stream Pedestrian Bridge at the University of Limerick Campus
Report Name:	Appropriate Assessment Screening Report
Document No.	PESS Bridge_AASR01
Issue No.	1
Date:	28/07/2025

This document has been issued and amended as follows:

Issue	Status	Date	Prepared	Checked
01	For issue – Final report	28 Jul 2025	MH	MH

Contents

1 Introduction

1.1 Background

The University of Limerick (UL) intends to replace an existing pedestrian bridge over a small channel, known as the Mill Stream, located near to the southern bank of the River Shannon, at the rear of the Physical Education and Sports Sciences (PESS) building, on the main campus of the University of Limerick. The bridge is in a state of disrepair and can no longer be safely used.

Brady Shipman Martin was appointed to prepare a report to assist the Competent Authority, Limerick City and County Council (LCCC), in undertaking a screening exercise for Appropriate Assessment (AA), should this be required. The purpose of the screening exercise is to assess, in view of best scientific knowledge, if the proposed works, individually or in combination with other plans or projects, are likely to have a significant effect on European sites, taking into account their conservation objectives.

This document constitutes an Appropriate Assessment Screening Report (AA Screening Report) prepared for this purpose.

A comprehensive study was undertaken and the potential for significant effects on European sites, both as a result of the proposed works and in-combination with other plans and projects, are appraised in this report.

1.2 Expertise and Qualifications

This report has been prepared by Senior Ecologist and Associate, Matthew Hague BSc MSc Adv. Dip. Plan. & Env. Law CEnv MCIEEM, of Brady Shipman Martin. Matthew is a highly experienced and qualified ecologist, with a master's degree in Ecosystem Conservation and Landscape Management. He has over 20 years of experience in ecological and environmental consultancy, across a wide range of sectors. Matthew is a Chartered Environmentalist (CEnv) and a full member of the Chartered Institute of Ecology and Environmental Management (MCIEEM). Matthew has also completed an Advanced Diploma in Planning and Environmental Law, at King's Inns and is a member of the Irish Environmental Law Association (IELA).

1.3 Legal Requirement for Appropriate Assessment

European sites make up a network of sites designated for nature conservation under Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (the "Habitats Directive") and Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds (the "Birds Directive"). The requirements for Appropriate Assessment are set out under Article 6 of the Habitats Directive, transposed into Irish law by the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended)[1] (the "Birds and Natural Habitats Regulations") and the Planning and Development Act, 2000 (as amended) (the "Planning Acts").

European sites are also known as Natura 2000 Sites (Special Areas of Conservation (SAC) and Special Protection Areas (SPA)). As defined in section 177R of the Planning Acts "European site" means:

(a) a candidate site of Community importance,
(b) a site of Community importance,
(ba) a candidate special area of conservation,

[1] SI No. 477 of 2011

(c) a special area of conservation,
(d) a candidate special protection area and
(e) a special protection area.

Article 6(3) of the Habitats Directive states that:

> *"(3) Any plan or project not directly connected with or necessary to the management of the site but likely to have significant effect thereon, either individually or in combination with other plans or projects, shall be subject to Appropriate Assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public."*

The first test is to establish whether, in relation to a particular plan or project, appropriate assessment is required. Section 177U of the Planning Acts requires that screening for appropriate assessment must be carried out:

- To assess, in view of best scientific knowledge, if the development, individually or in combination with another plan or project is likely to have a significant effect on the European site;
- An appropriate assessment is required if it cannot be excluded, on the basis of objective information, that the development, individually or in combination with other plans or projects, will have a significant effect on a European site.

The project is not required for the management of any European Site and this AA Screening Report has been prepared in accordance with the requirements of the Birds Directive, the Habitats Directive, the Planning Acts and the Birds and Natural Habitats Regulations.

2 Methodology

2.1 Guidelines

This report takes the following guidance documents into account:

- Chartered Institute of Ecology and Environmental Management (CIEEM). *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine,* September 2018, updated in September 2019 (V1.1), further updated in April 2022 (V1.2) and again in September 2024 (V1.3);
- Department of Environment, Heritage and Local Government (DoEHLG) (2010a). *Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities;*
- DoEHLG (2010b). *Circular NPW 1/10 & PSSP 2/10: Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities;*
- European Commission (2021). *Assessment of plans and projects in relation to Natura 2000 sites-Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC;*
- European Commission (2018). *Managing Natura 2000 sites: The Provisions of Article 6 of the Habitats Directive 92/43/EEC;*
- Directorate – General for Environment (European Commission), (2021). *Guidance document on the strict protection of animal species of Community Interest under the Habitats Directive*;

- National Roads Authority (NRA)[2] (2009). *Guidelines for Assessment of Ecological Impacts of National Road Schemes;*
- Office of the Planning Regulator (OPR) (2021). *Practice Note PN01 Appropriate Assessment Screening for Development Management.*
- National Parks and Wildlife Services (NPWS) (2021). *Guidance for Public authorities on the Application of Articles 12 and 16 of the EU Habitats Directive to development/works undertaken by or on behalf of a Public authority.*

2.2 Baseline Data Collection and Field Visits

A desk-based assessment was undertaken between May and July 2025 of the site and its environs. The appraisal focussed on habitats and species that are listed as Qualifying Interests (QI) (in the case of SACs) and Special Conservation Interests (SCI) (in the case of SPAs) for European sites.

In order to provide a baseline on the local ecological environment, a site visit was completed by Senior Landscape Architect George Dundon of Brady Shipman Martin on 10 July 2025.

An assessment of habitat suitability for species with links to European sites was also undertaken, in order to appraise the potential for *ex-situ* effects on European sites.

An examination of available information from Bat Conservation Ireland (BCI) and data from planning applications in the vicinity was carried out in order to compile a list of the species most likely to be present in the overall area. This included lesser horseshoe bat, a species listed as a qualifying interest in Danes Hole, Poulnalecka, SAC, which, at c.15.4km distant is, conceivably, within the potential Zone of Influence (defined in Section 4.2). Article 12 of the Habitats Directive requires Member States to take *requisite measures to establish a system of strict protection of animal species listed in Annex IV(a) in their natural range*.

Information was collated from the organisations and websites listed below:

- Data on European sites and rare and protected plant and animal species contained in the following databases:
  - The National Parks and Wildlife Service (NPWS) of the Department of Housing, Local Government and Heritage (www.NPWS.ie);
  - The National Biodiversity Data Centre (NDBC) (www.biodiversityireland.ie);
  - BirdWatch Ireland (www.birdwatchireland.ie);
  - Bat Conservation Ireland (www.batconservationireland.org).
- Information on land-use zoning from the online mapping of the Department of the Environment, Community and Local Government (www.myplan.ie);
- Recent and historical OSi mapping and aerial imagery, including www.geohive.ie;
- Photographs taken at the site;
- Information on local watercourses from www.catchments.ie;
- Information on water quality in the area (www.epa.ie);
- Information on soils, geology and hydrogeology in the area (www.gsi.ie);
- Information on the Status of EU Protected Habitats and Species in Ireland (Article 17 report) (NPWS, August 2019);
- National Biodiversity Plan 2023 – 2030 (Department of Housing, Local Government and Heritage, 2024);

[2] Now Transport Infrastructure Ireland (TII).

- Limerick Development Plan 2022-2028 (Limerick City and County Council, 2022).

This report takes full account of the proposed works, and a detailed examination of all relevant elements of the proposal as it currently stands, was undertaken.

3 Description of the Proposed Works

3.1 Site Location

The subject site (refer to Figures 3.1 to 3.3 below) is located in the northern part of the University of Limerick campus, to the rear of the PESS building. It comprises a small structure, mainly steel and wood, providing pedestrian access to a pathway that runs parallel to the River Shannon, between the Mill Stream and the main channel of the river. The pathway and the Mill Stream start close to Kilmurry Village, c.350mm to the east, running past the PESS building before turning away from the river near the Living Bridge and moving west, south of Dromroe Student Village for a distance before turning north to rejoin the river at Plassey Mill, some 800m to the west. The Mill Stream is a man-made channel, constructed to power Plassey Mills, a corn mill built in 1824.

The bridge is one of the few access points to the pathway and to the river itself – apart from this crossing, currently closed, the only other access points are some distance away to the east and west.

There is a small stream/ditch on the western side of the PESS building, this unnamed, manmade channel joins the Mill Stream just on the western side of the pedestrian bridge.

The existing bridge is inside the mapped boundary of the Lower River Shannon SAC and is zoned as '*University' as per the Limerick Development Plan 2022-2028*.

3.2 Description of the proposed works

The University of Limerick intends to replace the existing bridge, which is now in a dangerous condition and has been closed for some time. See Figures 3.4 – 3.7 (photographs of the bridge in July 2025).

The bridge replacement work is straightforward. It is proposed to simply cut the steel where it connects the bridge to its existing supports and then remove the bridge using a crane, which will be set up on the amenity grass area to the rear of the PESS building. Once this is done, the bridge abutments will be checked and made good, and minor repairs made if necessary. The new replacement bridge will then be installed using the crane.

On completion of the works the crane will be removed and once safety checks are completed the new bridge will be opened to the public.

No vegetation removal[3] or tree surgery will be required, and it is expected that the work will take no more than a day or two to complete. No excavation is required, no new drainage will be introduced, and no lighting is to be provided. There will be no works to the existing Mill Stream or to the drainage channel that enters the Mill Stream to the west of the bridge.

[3] It may be necessary to cut to ground level a young ash tree, to allow the works to take place. This tree has no value for roosting bats or nesting birds, and its removal is inconsequential in terms of its impact on local biodiversity (see Figure 3.5).

Figure 3.1 The location of the existing pedestrian bridge at the University of Limerick campus, Co. Limerick

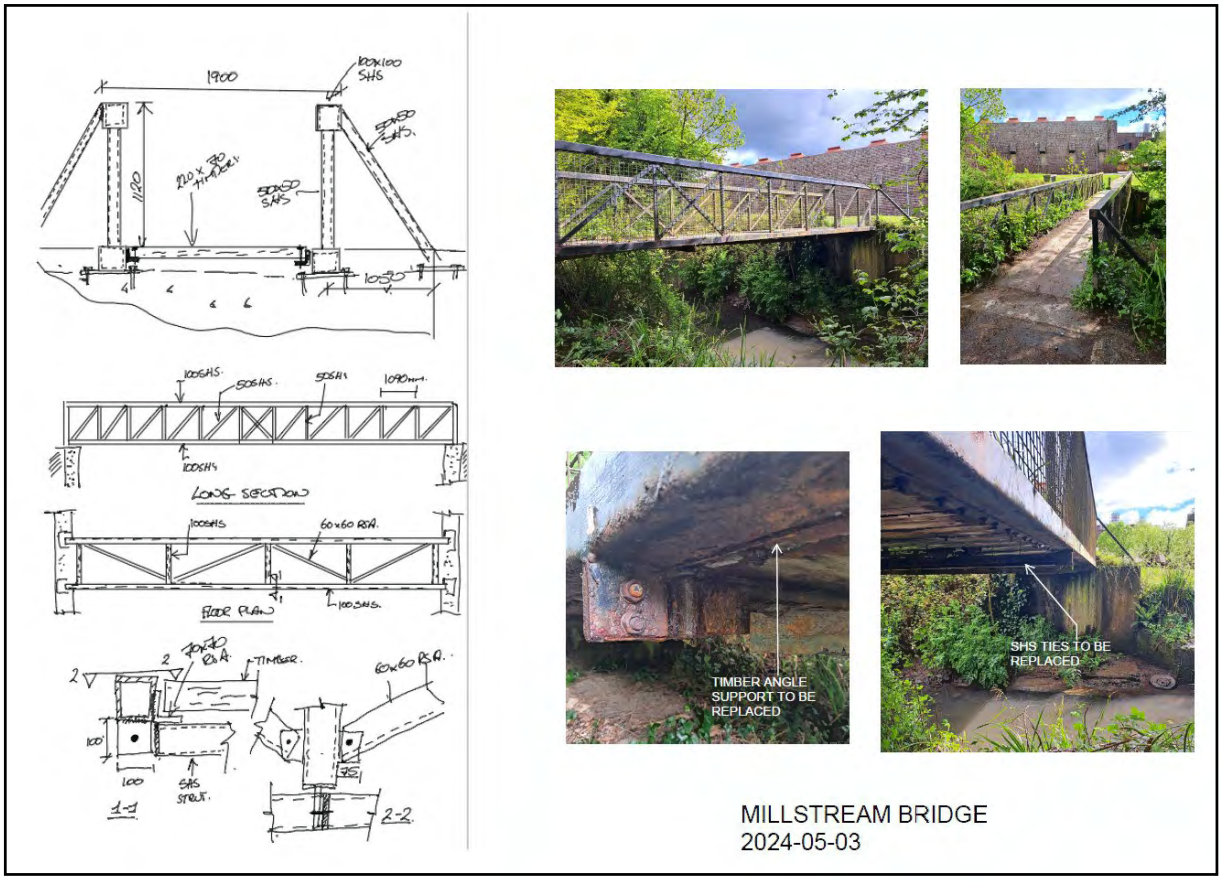


Figure 3.2 Images of the existing pedestrian bridge, and sketches of its current condition

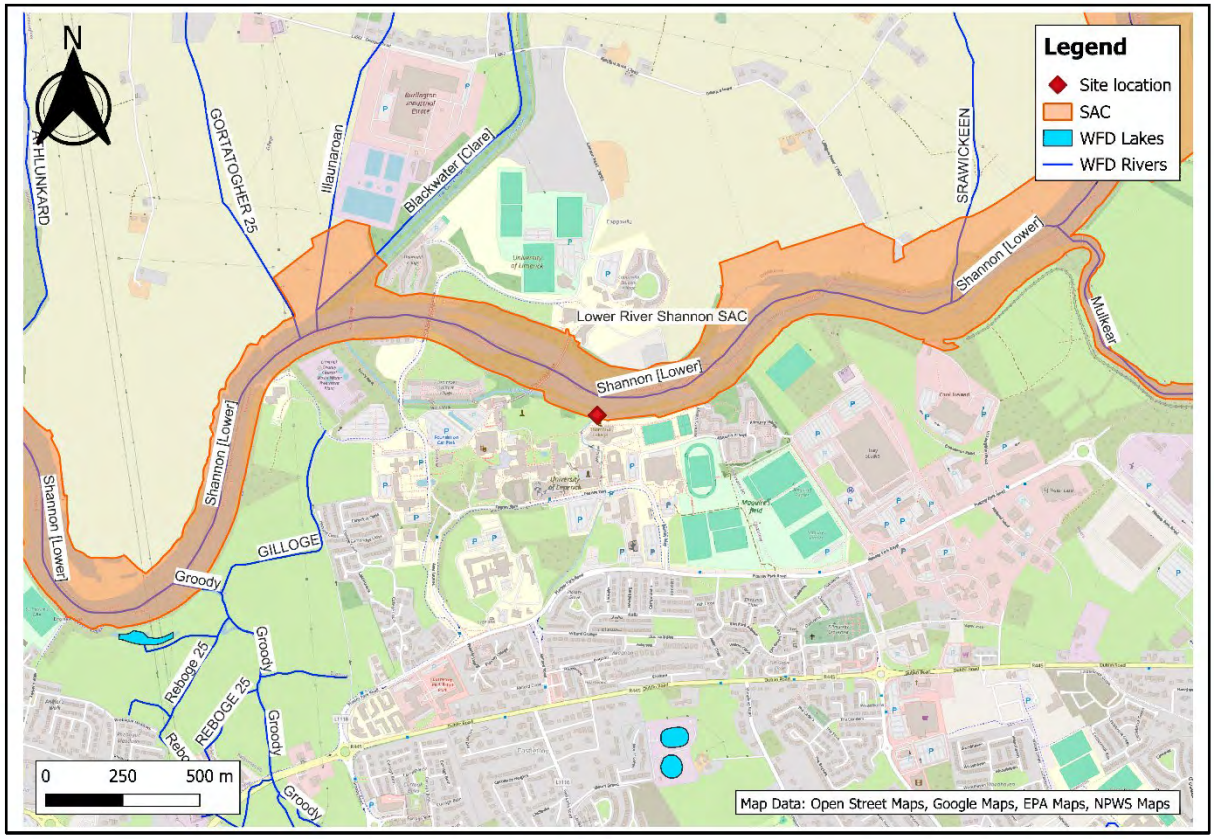


Figure 3.3 The location of the existing pedestrian bridge at the University of Limerick, Co. Limerick

Figure 3.4 View of the bridge from the PESS side. Note the Himalayan balsam in the minor channel to the west (left-hand side of the photograph – see Section 5.1)

Figure 3.5 View of the existing, dilapidated bridge from the east (note the small ash tree that many need to be cut to ground level)

Figure 3.6 The existing path between the Mill Stream and the River Shannon, with the closed bridge access visible on the right-hand side

Figure 3.7 View to the River Shannon from the existing bridge

4 Screening for Appropriate Assessment

4.1 Background

The first part of the AA process is the screening phase. Screening identifies the likely effects of any proposed works on European sites that could arise, either alone or in combination with other plans or projects and considers whether these impacts are likely to have a significant effect on the European site in view of the site's conservation objectives.

In accordance with sections 177U and of the Planning Acts, the AA screening test must be applied to the proposed development, as follows:

- To assess, in view of best scientific knowledge, if the development, individually or in combination with another plan or project is likely to have a significant effect on the European site;
- An Appropriate Assessment is required if it cannot be excluded, on the basis of objective information, that the development, individually or in combination with other plans or projects, will have a significant effect on a European site.

Screening must be undertaken without the inclusion of mitigation and it is in this context that this AA Screening Report is prepared.

In addition to the foregoing, OPR's Practice Note "*Appropriate Assessment Screening for Development Management*", dated March 2021 – also details a number of key concepts relevant to AA Screening, including *"Best Scientific Knowledge/Information in the Field"* (pg.5), stating:

> *"The screening determination must be based on scientific information relevant to the likely effects on the conservation objectives of the relevant European sites. The information should be up-to-date and based on the best available techniques and methods to estimate the presence and extent of effects. This is because if there is any scientific uncertainty as to the absence of significant effects, the project must be screened in for appropriate assessment.*
> *In the vast majority of cases the information provided by the applicant (including the project description) and publicly available information in relation to the European sites in question and information published by the NPWS, the EPA and others in relation to such sites, should provide a sufficient level of objective scientific information to allow the planning authority to make an informed decision on screening."*

Following screening therefore, if there is a possibility of there being a significant effect on a European site, this will generate the need for an appropriate assessment under section 177V of the Planning Acts for the purposes of compliance with Article 6(3) of the Habitats Directive. This means that if the conclusions at the end of the screening exercise are that significant effects on any European sites, as a result of the proposed development, either alone or in combination with other plans and projects, are likely, uncertain or unknown, then an Appropriate Assessment must be carried out. This is in accordance with established precedent and case law.

4.2 Potential Zone of Influence

This assessment is based on the source-pathway-receptor model, which dictates that, for an effect to occur, there must be a 'source' (such as a construction site); a 'receptor' (such as a designated site for nature conservation); and a 'pathway' between the two (such as a watercourse that links the construction site to the designated site). A construction site or completed development may also create

a barrier to movement, for example, by preventing the migration of fauna along a river corridor, or by obstructing the migration of birds.

Identification of a potential effect means that there is a possibility of ecological or environmental damage occurring, with the level and significance of the impact depending upon the nature and exposure to the potential effect and the characteristics of the receptor. Although there may be a risk of an impact, it may not necessarily occur, and if it does occur, it may not be significant. In other words, the existence of a source, a pathway and a receptor does not necessarily mean that a significant effect is likely.

There are no set recommended distances for projects to consider European sites as being relevant for assessment. In 2010, DoEHLG stated that (pp. 31 – 32):

> *"The approach to screening is likely to differ somewhat for plans and projects, depending on scale and on the likely effects, but the following should be included:*
>
> 1. *Any Natura 2000 sites within or adjacent to the plan or project area*
> 2. *Any Natura 2000 sites within the likely zone of impact of the plan or project. A distance of 15km is currently recommended in the case of plans, and derives from UK guidance (Scott Wilson et al., 2006). For projects, the distance could be much less than 15km, and in some cases less than 100m, but this must be evaluated on a case-by-case basis with reference to the nature, size and location of the project, and the sensitivities of the ecological receptors, and the potential for in combination effects*
> 3. *Natura 2000 sites that are more than 15km from the plan or project area depending on the likely impacts of the plan or project, and the sensitivities of the ecological receptors, bearing in mind the precautionary principle. In the cases of sites with water dependent habitats or species, and a plan or project that could affect water quality or quantity, for example, it may be necessary to consider the full extent of the upstream and/or downstream catchment."*

The 2021 Office of the Planning Regulator (OPR) guidelines, *Practice Note PN01: Appropriate Assessment Screening for Development Management*, state that the Zone of Influence *"should be established on a case-by-case basis using the Source-Pathway-Receptor framework and not by arbitrary distances (such as 15 km)"* (p. 8).

Therefore, considering the nature, scale and location of the permitted development, and in accordance with the source-pathway-receptor model, the potential Zone of Influence for the permitted development including the proposed amendments is:

- Any site to which there is a pathway from the development site during either the construction or operational phase of the development as defined in the following sections.

4.2.1 European Sites

The nearest European sites are as follows (see **Figure 4.1**):

- Special Areas of Conservation (SAC):
  - Lower River Shannon SAC (site code 002165): the subject site is within the boundary of this SAC;
  - Glenomra Wood SAC (site code 001013), c. 8.7km to the north;
  - Clare Glen SAC (site code 000930), c. 11.5km to the east;
  - Glenstal Wood SAC (site code 001432), c. 12.1km to the east;
  - Slieve Bernagh Bog SAC (site code 002312), c. 14.6km to the north;

- Danes Hole, Poulnalecka SAC (site code 000030), c. 15.4km to the north-west.

- Special Protected Areas (SPA):
  - River Shannon and River Fergus Estuaries SPA (site code 004077), c. 4.7km to the south-west;
  - Slievefelim to Silvermines Mountains SPA (site code 004165), c. 11.2km to the east.

Note that the above-listed distances are linear (i.e. 'as the crow flies').

The Conservation Objectives of these sites are to maintain or restore the favourable conservation condition of the QIs / SCIs in question. Where specific conservation objectives have been set out by the NPWS, 'favourable conservation condition' is defined in respect of specific attributes and targets for the habitat or species in question. For further information, refer to Appendix II.

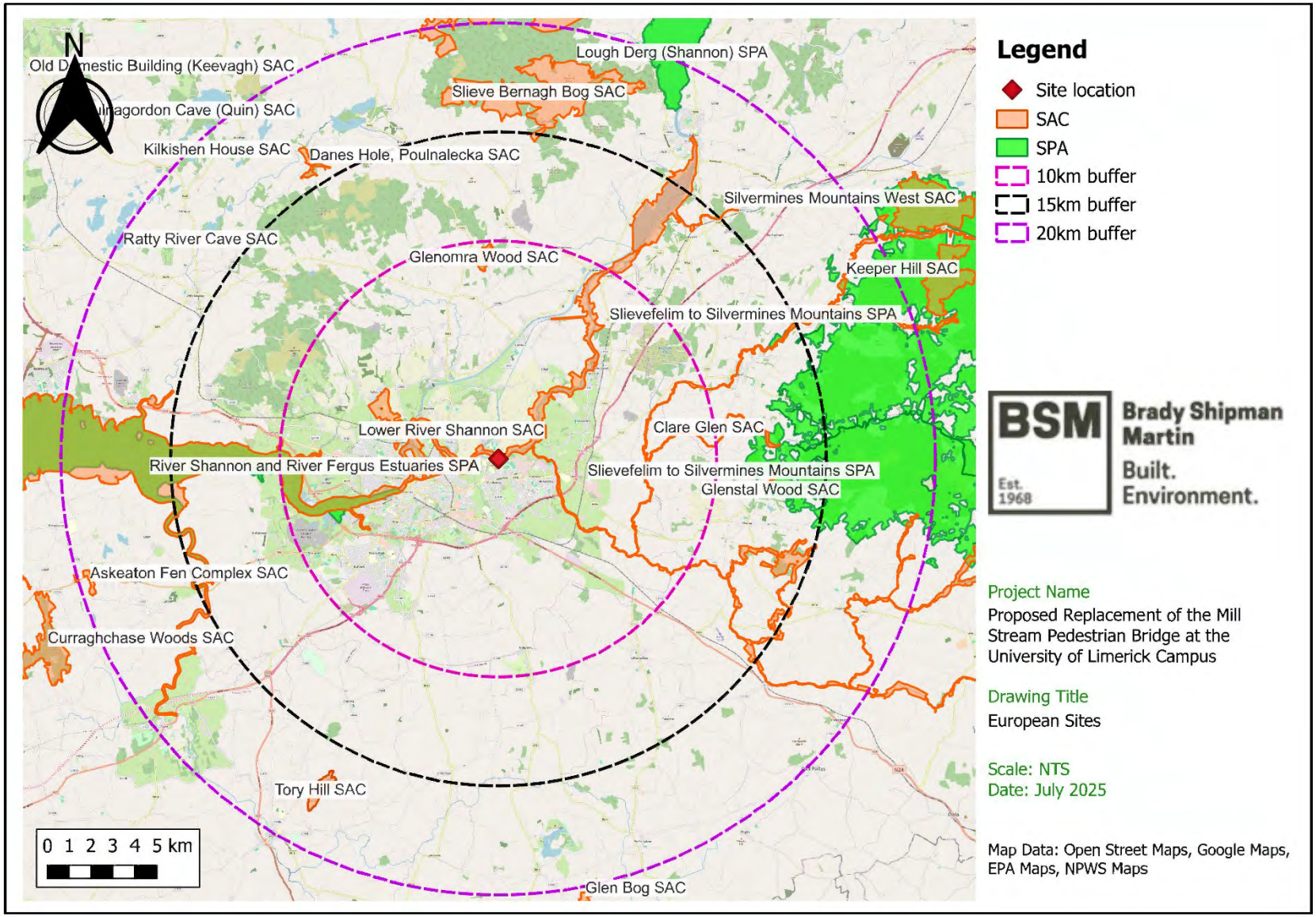


Figure 4.1 European sites within zone of influence of the proposed bridge replacement works. 10km, 15km and 20km radii are shown for scale.

4.2.2 Other Designated Areas (other than European sites)

Designated sites other than European sites (i.e. proposed Natural Heritage Areas (pNHA) and designated Natural Heritage Areas (NHA)) within the potential Zone of Influence have been included in this assessment in order to address their potential to act as supporting sites for European sites. The NHA and pNHA sites within the ZoI are as follows:

- Natural Heritage Area (NHA):
  - Woodcock Hill Bog NHA (site code 002402), c. 9.1km to the north-west;
  - Gortacullin Bog NHA (site code 002401), c. 13.2km to the north-west;
  - Doon Lough NHA (site code 000337) c. 15.2km to the north-west.
- Proposed Natural Heritage Areas (pNHA):
  - Cloonlara House pNHA (site code 000028), c. 3.7km to the north;
  - Castleconnell (Domestic Dwelling, Occupied) pNHA (site code 000433), c. 3.8km to the north-east;
  - Fergus Estuary and Inner Shannon, North Shore pNHA (site code 002048), c. 4.0km to the south-west;
  - Knockalisheen Marsh pNHA (site code 002001), c. 4.6km to north-west;
  - Inner Shannon Estuary – South Shore pNHA (site code 000435), c. 5.4km to the south-west;
  - Loughmore Common Turlough pNHA (site code 000438), c. 8.9km to the south-west;
  - Glenomra Wood pNHA (site code 001013), c. 8.6km to the north;
  - Clare Glen pNHA (site code 000930), c. 11.5km to the east;
  - Garrannon Wood pNHA (site code 001012), c. 11.9km to the north-west;
  - Glenstal Wood pNHA (site code 001432), c. 12.0km to the east;
  - Ballyvorheen Bog pNHA (site code 001849), c. 13.0km to the south-east;
  - Skoolhill pNHA (site code 001996), c. 13.3km to the south;
  - Derrygareen Heath pNHA (site code 000931), c. 14.3km to the east;
  - Castle Lake pNHA (site code 000239), c. 14.7km to the north-west.

The above distances are as the crow flies (i.e. linear distances). No impacts are expected on the Fergus Estuary and Inner Shannon, North Shore pNHA, nor on any other NHA or pNHA in the zone of influence, for the reasons set out in the following sections of this report as they relate to the European sites.

Figure 4.2 illustrates all the NHA and pNHA within the potential Zone of Influence (including those which overlap with European sites).

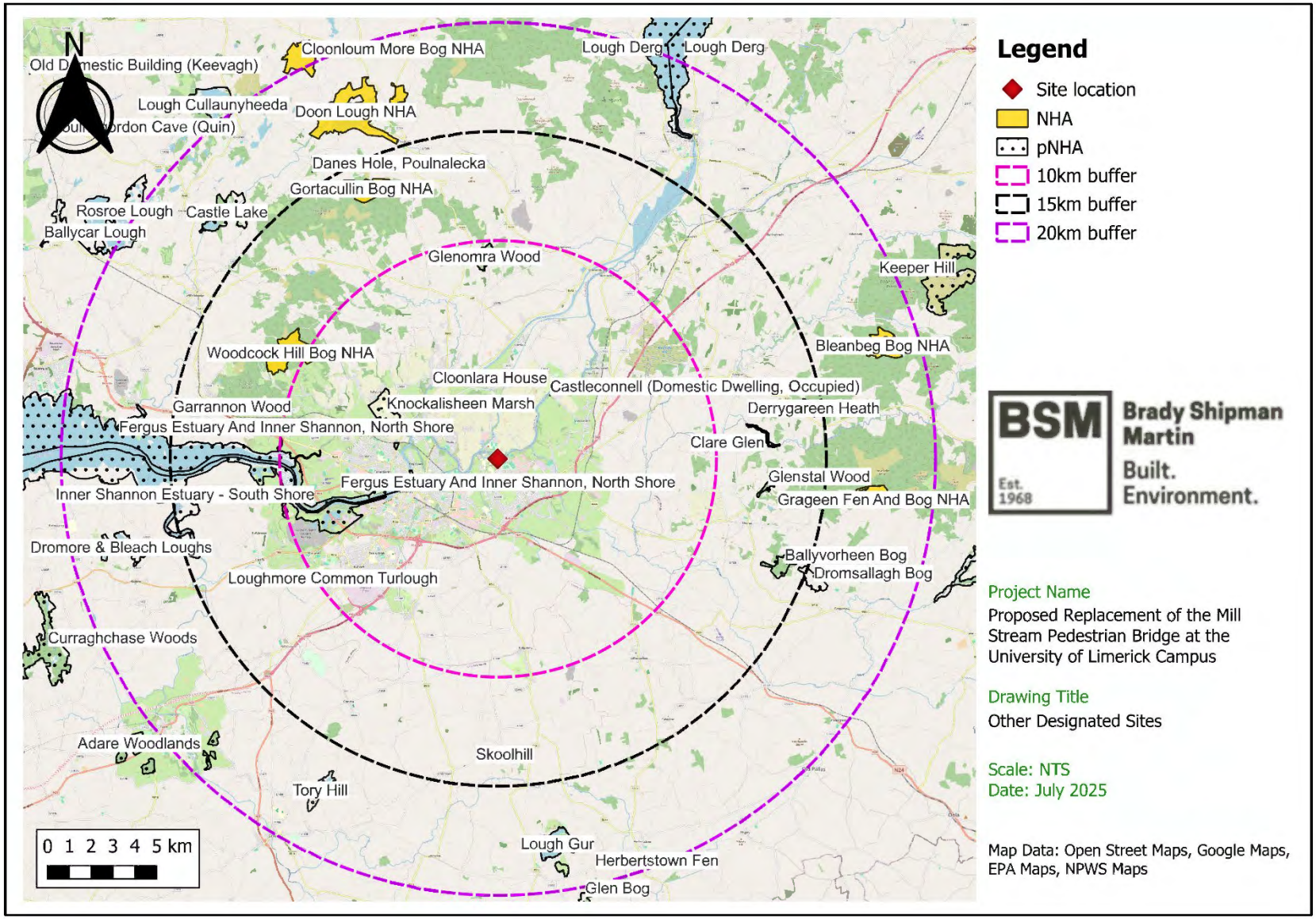


Figure 4.2 NHA and pNHA sites within zone of influence of the proposed bridge replacement works. 10km, 15km and 20km radii are shown for scale.

4.2.3 Watercourses, and pathways to European sites

A review of the Environmental Protection Agency (EPA) web-tool indicates that the main channel of the River Shannon runs in close proximity (within 20m) to the north of the existing bridge. The bridge itself crosses the Mill Stream channel as set out in Section 3.1.

Because of its location there exists a potential surface water link between the site of the proposed works and the Lower River Shannon SAC (and the River Shannon and River Fergus Estuaries SPA) should any surface water arising at the site discharge to the river / estuary. Refer to **Figure 4.3.**

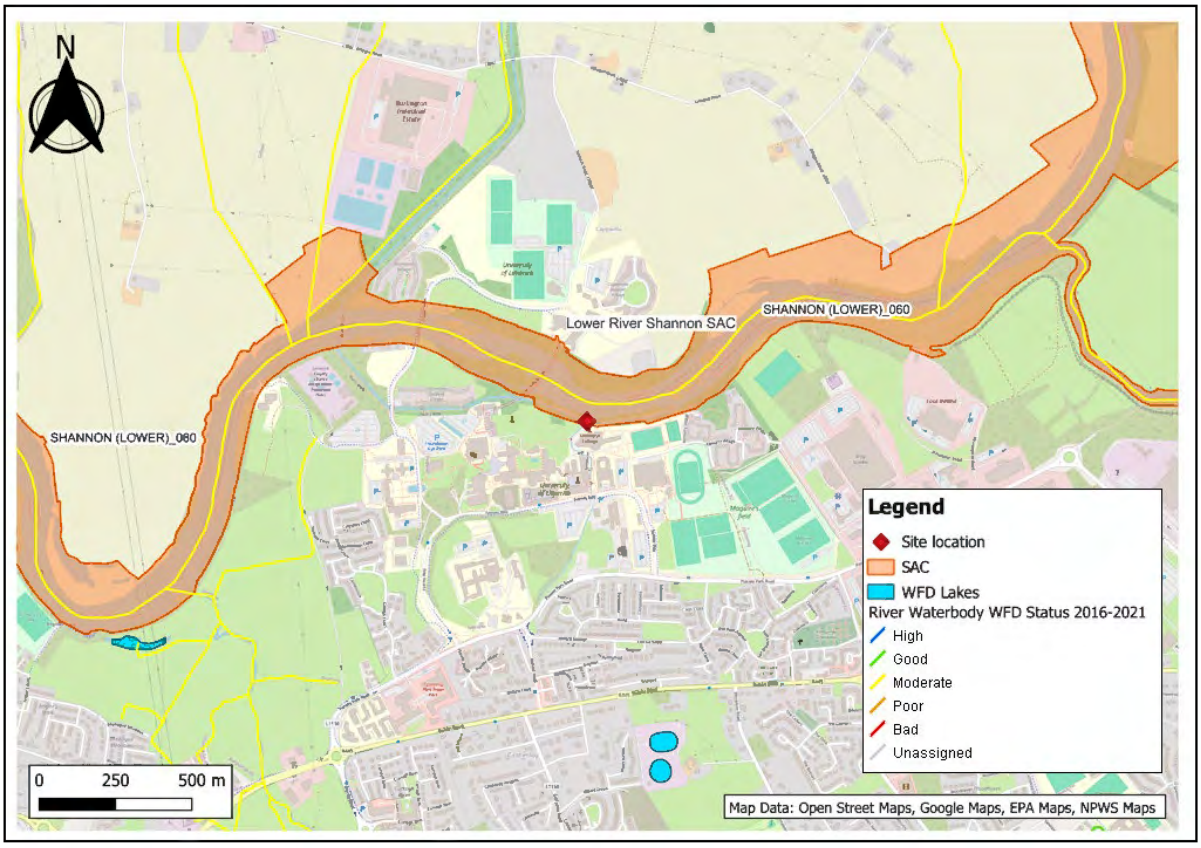


Figure 4.3 WFD status of EPA waterbodies in the proximity of the proposed works

4.2.4 Zone of Influence

Considering the nature, scale and location of the proposed works, which solely comprise the replacement of an existing bridge, in accordance with the source-pathway-receptor model, the potential Zone of Influence (ZoI) for the proposed development is limited to a single European site – the Lower River Shannon SAC (see **Section 4.2.1**). Although the River Shannon and River Fergus Estuaries SPA is c.4.7km downstream and there is a potential pathway via the Shannon, it is not remotely conceivable that there could be a significant effect on this SPA, due to the distance and the scale of the project as well as the very short duration of the works.

5 Potential impacts from the proposed development including in-combination effects

5.1 European sites and habitats with links to European sites

Although close to (within 20m) of the River Shannon, and within the boundary of the Lower River Shannon SAC, none of the habitats and species listed as qualifying interests in this SAC are present at or in the vicinity of the site. See Table 5.1 for full details. Furthermore, no rare, threatened or legally protected plant species, as listed in the *Irish Red Data Book 1 – Vascular Plants (Curtis & McGough, 1988)*, the *Flora Protection Order*, 2022 or the EU Habitats Directive, are known to occur within the site.

There are records of giant hogweed (*Heracleum mantegazzianum*) and Himalayan balsam (*Impatiens glandulifera*) from 2023 in the National Biodiversity Data Centre (NBDC) database within the 2km grid square (R65E) that covers the site, and the authors have recorded giant hogweed, Himalayan balsam, Japanese knotweed (*Reynoutria japonica*) and three-cornered leek (*Allium triquetrum*) along the banks of the River Shannon near this location. Himalayan balsam is widespread in the vicinity of the existing bridge, particularly downstream in the Mill Stream, and in the small ditch to the west of the PESS building.

Although located adjacent to the River Shannon, and near extensive areas of broadleaved and riparian woodland (mainly Fossitt habitat code WD1), there are no rare habitats or habitats of particularly high ecological value (i.e. International, National or County Importance) present at the site of the existing bridge. In the immediate vicinity are the stream itself (effectively a drainage ditch – Fossitt habitat code FW4), as well as scrub (WS1). Other habitats nearby include amenity grassland (GA2 - where the crane will be placed) and BL3 – buildings and artificial surfaces (the path network at the subject site).

No evidence of any habitats or species with links to European sites was recorded during either the field survey or desk study undertaken and no 'reservoir' type habitats (habitats which have the potential to support Qualifying Interest / Special Conservation Interest species in any European site) are present.

Otters (protected under Article 12 of the Habitats Directive) are frequently recorded along the River Shannon, however the works area itself is unsuited to use by otters (or badgers or other protected species).

The woodland along the River Shannon has good potential for roosting, commuting and foraging bats however there are no features suitable for use by roosting bats (like otters, bats are protected under Article 12 of the Habitats Directive at the subject site. This includes features potentially used by lesser horseshoe bat (for which Danes Hole, Poulnalecka SAC is designated).

Overall, given its location adjacent to the River Shannon the works area is of local importance (higher value) as defined by the ecological resource valuations presented in the National Roads Authority / Transport Infrastructure Ireland Guidelines for Assessment of Ecological Impacts of National Road Schemes (NRA/TII, 2009 (Rev. 2)).

The replacement bridge will be installed as described in Section 3.2. Very minor works are required and there will be no loss of any features of significant ecological value. Once the installation works are complete, the bridge will be reopened.

5.1.1 Potential impacts during construction

At any development site, no matter how minor, construction and demolition activities pose a potential risk to water as surface / ground water arising at a site may contain contaminants. The main

contaminants arising from construction activities may include suspended solids, hydrocarbons and concrete / cement products. If not properly managed, such pollutants could pose a temporary risk to surface water quality in the local surface water network during construction.

The River Shannon (main channel) is within c. 20m of the subject site. Given the location of the site in relation to the River Shannon there is a potential surface water link between the site of the proposed works and the Lower River Shannon SAC, via the Mill Stream, where it rejoins the river, some 800m to the west.

However, considering the distance to the river, the habitats that separate the site from the river, and the very limited extent of the works proposed, there is no possibility that polluted surface water could be emitted directly to it. Further, given the nature, scale and location of the proposed works there is no potential groundwater pathway between the subject site and the European sites.

Despite the presence of a surface water pathway to the River Shannon, the risk of contamination of any watercourses or groundwater is extremely low and even in the event of a pollution incident on site, it is reasonable to assume that this would not be perceptible in Lowre River Shannon or any other European sites, for the following reasons:

- Any pollution from the bridge replacement works would be minimal, if not negligible, in quantity and if it flowed into the Shannon via surface run-off and the Mill Stream it would be so diluted as to be undetectable by the time it entered the river. A significant level of dilution and mixing of surface water would occur in any event. Upon reaching the river any pollutants would be even further diluted and dissipated by the receiving waters;
- In addition, the construction of the proposed development will take place over a very short period (see Section 3.2). There is no possibility of long-term impacts arising as a result of the bridge replacement, given the location, nature and scale of the proposed works.

There is no possibility of any other potential direct, indirect or secondary impacts on any European site during the construction phase. For example, there will be no land-take from any European site (the project will simply replace a dilapidated bridge with a new structure, fit for purpose) and there will be no resource requirements such as water abstraction. Similarly, there will be no emissions to air from construction vehicles that could remotely impact any European site. There is no possibility that dust, noise and vibration arising during the replacement works could affect the Lower River Shannon SAC or any other European site.

There will be no loss, fragmentation, disruption, disturbance or other change to any element of any European site as a result of the removal of the existing bridge and the installation of the replacement structure, and no interference with the key relationships that define the structure or function of any European site.

Significant effects arising as a result of the installation of the replacement pedestrian bridge, on European sites (or on proposed Natural Heritage Areas), can therefore be excluded.

5.1.2 Potential impacts during operation

There is no possibility of any potential direct, indirect or secondary impacts on any European site once the replacement pedestrian bridge is installed and operational. There will be no loss, fragmentation, disruption, disturbance or other change to any element of any European site as a result of the operation of the bridge, and no interference with the key relationships that define the structure or function of any European site. Furthermore, the bridge will not be lit, and there will be no impacts from artificial lighting on bats, birds or large mammals (such as otters) once the once the replacement bridge is operational.

Significant effects arising as a result of the operation of the replacement pedestrian bridge, on European sites (or on proposed Natural Heritage Areas), can therefore be excluded.

A detailed discussion of the potential impacts of the proposed development on individual European sites within the potential Zone of Influence is presented in Table 5.1, below.

Table 5.1 Potential impacts on designated sites in the potential Zone of Influence

Site	Reasons for designation (information correct as of July 2025)	Discussion of Source-Pathway-Receptor Link	Likely Significant Effect?
Special Areas of Conservation (SAC)			
Lower River Shannon SAC (site code 002165): the existing bridge is within the site boundary of the SAC	▪ 1029 Freshwater Pearl Mussel (*Margaritifera margaritifera)* ▪ 1095 Sea Lamprey (*Petramyzon marinus)* ▪ 1096 Brook Lamprey (*Lampetra planeri)* ▪ 1099 River Lamprey (*Lampetra fluviatilis)* ▪ 1106 Atlantic Salmon *Salmo salar* (only in fresh water) ▪ 1110 Sandbanks which are slightly covered by sea water all the time ▪ 1130 Estuaries ▪ 1140 Mudflats and sandflats not covered by seawater at low tide ▪ 1150 *Coastal lagoons ▪ 1160 Large shallow inlets and bays ▪ 1170 Reefs ▪ 1220 Perennial vegetation of stony banks ▪ 1230 Vegetated Sea cliffs of the Atlantic and Baltic coasts ▪ 1310 *Salicornia* and other annuals colonizing mud and sand ▪ 1330 Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*) ▪ 1349 Bottlenose Dolphin (*Tursiops truncates)* ▪ 1355 Otter (*Lutra lutra)* ▪ 1410 Mediterranean salt meadows (*Juncetalia maritimi*)	No significant effects on water quality, or on any of the site's QIs, are predicted. The works associated with the proposed pedestrian bridge replacement works are very minor in nature, comprising only the removal of the existing dilapidated structure, minor repairs to the existing bridge supports and the installation and fixing in place of the new bridge, with works taking place over a very short period. It is not remotely likely that contamination of watercourses (the minor channel that enters the Mill Stream, the Mill Stream itself or the main channel of the River Shannon) could occur during the works – given the methodology proposed (see Section 3.2). Even in the event of a pollution incident (such as a fuel spill from the crane), such pollution would be minimal in quantity and even in the event that it entered the Mill Stream it would be so diluted that it would not be perceptible in the River Shannon itself (over 80m downstream at Plassey Mills), due to the very small volumes. There will be no significant effects on any of the QIs of the Lower River Shannon SAC, including on mobile species such as otters (there are no otter holts in the vicinity of the existing bridge) or fish – including on spawning/breeding grounds of fish. There is no possibility of any operational phase impacts, either direct or indirect (such as via foul/wastewater, which will not arise). There will be no loss of habitat or species, fragmentation or disturbance to the qualifying interests of this site as a result of the proposed works. <u>Notes:</u> The Mill Stream contains none of the qualifying habitats for which the SAC is designated, and there is no realistic pathways to any listed habitats. ▪ Freshwater pearl mussel is known only from the Cloon River in Co. Clare. No impact possible – there is no hydrological/hydrogeological link between the subject site and the Cloon River, which is some 50km (straight line distance) from the site. ▪ No instream works will take place, and there is no possibility that the works could impact on otter, lamprey species, Atlantic salmon, or bottlenose dolphin	No

Site	Reasons for designation (information correct as of July 2025)	Discussion of Source-Pathway-Receptor Link	Likely Significant Effect?
	▪ 3260 Water courses of plain to montane levels with the *Ranunculion fluitontis* and *Callitricho-Batrachion* vegetation ▪ 6410 Molinia meadows on calcareous, peaty or clayey-silt-laden soils (*Molinion caeruleae*) ▪ 91E0 *Alluvial forests with Alnus glutinosa and Fraxinus excelsior (*Alno-Padion, Alnion incanae, Salicion olbae*) *indicates a priority habitat under the Habitats Directive According to this SAC's site Conservation Objectives document (Version 1, dated 07 August 2012), for each of the listed QIs, the Conservation Objective is to maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected.	▪ The sandbank habitat is some 80km downstream and there is no conceivable possibility of any impacts ▪ The coastal lagoon habitat is some 25km downstream and there is no conceivable possibility of any impacts ▪ The large shallow inlets and bays habitat is some 65km downstream and there is no conceivable possibility of any impacts ▪ The reef habitat is some 35km downstream and there is no conceivable possibility of any impacts ▪ The perennial vegetation of stony banks habitat is some 60km downstream and there is no conceivable possibility of any impacts ▪ The vegetated sea cliff habitat is some 80km downstream and there is no conceivable possibility of any impacts ▪ The watercourses of plain to montane level habitat is all upstream of UL (the Bilboa River) or several km downstream and there is no conceivable possibility of any impacts. These habitats are not present in the Mill Stream ▪ The Molinia meadow habitat is upstream (Castleconnell) and there is no conceivable possibility of any impacts ▪ The alluvial forest habitat is upstream (Castleconnell) and there is no conceivable possibility of any impacts ▪ The River Shannon at UL is within the area mapped as Estuaries in the CO document[4]. However the proposed bridge replacement works will not in any way impact on the estuarine Intertidal or sub-tidal sediments, nor on the mudflat and sandflat habitat or the Mediterranean salt meadows, Atlantic salt meadows and Salicornia habitats, all several km downstream.	
Glenomra Wood SAC (site code 001013), c. 8.6km to the north	▪ 91A0 Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles According to this SAC's site Conservation Objectives document (Version 1, dated 19 June 2018), for each of the listed QIs, the Conservation Objective is to maintain the	There is no direct hydrological link or any other pathway between the site of the proposed pedestrian bridge replacement works and this SAC. It is over 8km distant and is completely unconnected via any pathway. Furthermore, there will be no loss of habitat or species, fragmentation or disturbance to the QIs of this SAC.	No

[4] https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO002165.pdf

Site	Reasons for designation (information correct as of July 2025)	Discussion of Source-Pathway-Receptor Link	Likely Significant Effect?
	favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected.		
Clare Glen SAC (site code 000930), c. 11.5km to the east	▪ 91A0 Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles ▪ 1421 Killarney Fern (Trichomanes speciosum) According to this SAC's site Conservation Objectives document (Version 1, dated 16 May 2018), for each of the listed QIs, the Conservation Objective is to maintain the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected.	There is no direct hydrological link or any other pathway between the site of the proposed pedestrian bridge replacement works and this SAC. It is over 11km distant and is completely unconnected via any pathway. Furthermore, there will be no loss of habitat or species, fragmentation or disturbance to the QIs of this SAC.	No
Glenstal Wood SAC (site code 001432), c. 12.1km to the east	▪ 1421 Killarney Fern (*Trichomanes speciosum)* According to this SAC's site Conservation Objectives document (Version 1, dated 15 May 2018), for each of the listed QIs, the Conservation Objective is to maintain the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected.	There is no direct hydrological link or any other pathway between the site of the proposed pedestrian bridge replacement works and this SAC. It is over 12km distant and is completely unconnected via any pathway. Furthermore, there will be no loss of habitat or species, fragmentation or disturbance to the QIs of this SAC.	No
Slieve Bernagh Bog SAC (site code 002312), c. 14.6km to the north	▪ 4010 Northern Atlantic wet heaths with *Erica tetralix* ▪ 4030 European dry heaths ▪ 7130 Blanket bogs (* if active bog) * indicates a priority habitat under the Habitats Directive	There is no direct hydrological link or any other pathway between the site of the proposed pedestrian bridge replacement works and this SAC. It is almost 15km distant and is completely unconnected via any pathway. Furthermore, there will be no loss of habitat or species, fragmentation or disturbance to the QIs of this SAC.	No

Site	Reasons for designation (information correct as of July 2025)	Discussion of Source-Pathway-Receptor Link	Likely Significant Effect?
	According to this SAC's site Conservation Objectives document (Version 1, dated 18 August 2016), for each of the listed QIs, the Conservation Objective is to restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected.		
Danes Hole, Poulnalecka SAC (site code 000030), c. 15.4km to the north-west	▪ 8310 Caves not open to the public ▪ 91A0 Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles ▪ 1303 *Rhinolophus hipposideros* (Lesser Horseshoe Bat) According to this SAC's site Conservation Objectives document (Version 1, dated 24 July 2018), for each of the listed QIs, the Conservation Objective is to maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected.	There is no direct hydrological link or any other pathway between the site of the proposed pedestrian bridge replacement works and this SAC. It is over 15km distant and is completely unconnected via any pathway. The proposed works will not impact on lesser horseshoe bats in any way. Furthermore, there will be no loss of habitat or species, fragmentation or disturbance to the QIs of this SAC.	No
Special Protection Areas (SPA)			
River Shannon and River Fergus Estuaries SPA (site code 004077), c. 4.7km to the south-west	▪ A017 Cormorant (*Phalacrocorax carba)* ▪ A038 Whooper Swan (*Cygnus cygnus)* ▪ A046 Light-bellied Brent Goose (*Branta bernicla hrota*) ▪ A048 Shelduck (*Tadarna tadorna*) ▪ A050 Wigeon (*Anas penelope*) ▪ A052 Teal (*Anas crecca*) ▪ A054 Pintail (*Anas acuta*)	No significant effects on water quality, and therefore on the site's SCIs, are predicted. The works associated with the proposed pedestrian bridge replacement works are very minor in nature, comprising only the removal of the existing dilapidated structure, minor repairs to the existing bridge supports and the installation and fixing in place of the new bridge, with works taking place over a very short period. It is not remotely likely that contamination of watercourses (the minor channel that enters the Mill Stream, the Mill Stream itself or the main channel of the River Shannon) could occur during the works – given the methodology proposed (see Section 3.2). Even in the event of a pollution incident (such as a fuel spill from the crane), such	No

Site	Reasons for designation (information correct as of July 2025)	Discussion of Source-Pathway-Receptor Link	Likely Significant Effect?
	▪ A056 Shoveler (*Anas clypeata)* ▪ A062 Scaup (*Aythya marila)* ▪ A137 Ringed Plover (*Charadrius hiaticula)* ▪ A140 Golden Plover *(Pluvialis apricaria)* ▪ A141 Grey Plover (*Pluvialis squatarala)* ▪ A142 Lapwing (*Vanellus vanellus)* ▪ A143 Knot (*Calidris canutus)* ▪ A149 Dunlin (*Calidris alpina)* ▪ A156 Black-tailed Godwit (*Limosa limosa)* ▪ A157 Bar-tailed Godwit (*Limosa lappanica)* ▪ A160 Curlew (*Numenius arquata*) ▪ A162 Redshank (*Tringa tetanus*) ▪ A164 Greenshank (*Tringa nebularia*) ▪ A179 Black-headed Gull (*Chraicocephalus ridibundus)* ▪ A999 Wetlands According to this SPA's site Conservation Objectives document (Version 1 - dated 17 September 2012), for each of the listed SCIs, the Conservation Objective is to maintain the favourable conservation condition of the species and wetland habitat for which the SPA has been selected.	pollution would be minimal in quantity and even in the event that it entered the Mill Stream it would be so diluted that it would not be perceptible in the River Shannon itself (over 80m downstream at Plassey Mills), due to the very small volumes – and not the remotest possibility of an effect almost 5km downstream. There will be no significant effects on any of the SCIs of the River Shannon and River Fergus SPA. There is no possibility of any operational phase impacts, either direct or indirect (such as via foul/wastewater, which will not arise). There will be no loss of habitat or species, fragmentation or disturbance to the qualifying interests of this site as a result of the proposed works.	
Slievefelim to Silvermines Mountains SPA (site code 004165), c. 11.1km to the east	▪ A082 Hen Harrier (*Circus cyaneus*) According to this SPA's site Conservation Objectives document (Version 1 - dated 23 September 2022), for each of the listed SCIs, the Conservation Objective is to restore the	There is no direct hydrological link or any other pathway between the site of the proposed pedestrian bridge replacement works and this SPA. It is approximately 11km distant and is completely unconnected via any pathway.	No

Site	Reasons for designation (information correct as of July 2025)	Discussion of Source-Pathway-Receptor Link	Likely Significant Effect?
	favourable conservation condition of the species and wetland habitat for which the SPA has been selected.	Furthermore, there will be no loss of habitat or species, fragmentation or disturbance to the SCIs of this SPA.	

5.2 Summary of potential impacts of the proposed pedestrian bridge replacement works

There will be no loss of any habitat or species listed as a QI or SCI of any designated site as a consequence of the provision of the proposed replacement bridge. There is, therefore, no potential for the effects of habitat loss or fragmentation to occur.

There will also be no significant effects on any European sites as a result of:

- Habitat loss and/or fragmentation;
- Land-take;
- Resource requirements such as water abstraction;
- Impacts to habitat structure;
- Mortality to species (such as roadkill);
- Noise pollution / vibration impacts;
- Light pollution;
- Emissions to air (including dust);
- Emissions to water.

Several invasive plant species (*i.e.* those species listed on Schedule 3 of the *Birds and Habitats Regulations, 2011-2022*) are known to be present in the wider area, including a stand of Himalayan balsam in the Mill Stream and in the nearby ditch. The Himalayan balsam will not be interfered with in any way by the proposed works and neither this nor any other such invasive species will be introduced or caused to be spread by the proposed works.

Additionally, for the reasons outlined in this report for the European sites, no impacts on any other designated sites including proposed Natural Heritage Areas, will occur.

6 Mitigation Specific to European Sites

This screening assessment is consistent with the judgment of the European Court in Case C-323/17, People Over Wind & Sweetman v Coillte (Judgment of the Court (Seventh Chamber) of 12 April 2018) and the recent case-law of the High Court, including Heather Hill Management Company CLG v An Bord Pleanála [2019] IEHC 450 and Sweetman v An Bord Pleanála [2020] IEHC 39.

It is also consistent with the judgment in Eco Advocacy CLG v An Bord Pleanála [2021] IEHC 265. In that case, Humphreys J confirmed the core legal principle, being that regard should not be had to mitigation measures at AA screening stage. Humphreys J decided in that case that clarification was required from the CJEU on the matter (as it related to the consideration of SUDs and whether these represented mitigation measures).

The CJEU, in its ruling on this case dated 15 June 2023 clarified issues defining mitigation in the context of European sites[5]. It confirmed that Article 6(3) of Directive 92/43 *must be interpreted as meaning that, in order to determine whether it is necessary to carry out an appropriate assessment of the implications of a plan or project for a site, account may be taken of the features of that plan or project which involve the removal of contaminants and which therefore may have the effect of reducing the harmful effects of the plan or project on that site, where those features have been incorporated into*

5 https://curia.europa.eu/juris/document/document.jsf?text=&docid=274644&pageIndex=0&doclang=EN&mode=lst&dir=&occ=first&part=1&cid=21723482

that plan or project as standard features, inherent in such a plan or project, irrespective of any effect on the site.

In relation to European sites, there will be no impacts (such as pollution events, habitat loss, disturbance or any other impacts) capable of giving rise to any likely significant effects on European sites as a result of the replacement of the existing pedestrian bridge.

As set out in this report, it is certain that likely significant effects on European sites as a result of the replacement of the existing pedestrian bridge can be excluded.

No mitigation is necessary or proposed for the protection of European sites.

7 In-combination Effects

It is a requirement of Section 177U of the Planning Acts that, when considering whether a plan or project will have a significant effect on a European site, the assessment must take into account in-combination effects with other plans and projects. The assessment should consider plans and projects that are completed, approved but uncompleted, or proposed (but not yet approved)[6]. If there are identified effects arising from the plan or project, even if they are perceived as minor and not likely to have a significant effect on the integrity of a European site alone, then these effects must be considered in combination with the effects arising from other plans and projects.

The following sources were consulted to identify relevant other plans or projects:

- Limerick Development Plan 2022-2028 (Limerick City and County Council (2022));
- Limerick City and County Council Planning Viewer (accessed July 2025);
- An Board Pleanála database (www.pleanala.ie – accessed July 2025); and
- EIA Portal (www.housinggovie.maps.arcgis.com – accessed July 2025).

Permitted and proposed projects in the immediate vicinity of the proposed works area were considered in terms of the potential for in-combination effects. No developments are proposed within the immediate vicinity of the site that would, in combination with the works under appraisal in this report, give rise to significant effects. This includes projects that are currently under construction, have recently been granted planning permission or are awaiting a decision within the wider UL campus:

A number of other plans were considered when assessing in-combination effects, but it was determined that there would be no in-combination effects with these:

- Revised National Planning Framework (April 2025);
- Climate Action Plan 2025 (CAP 25);
- Limerick Climate Action Plan (LACAP) 2024 – 2029;
- National Biodiversity Action Plan 2023 – 2030.

It is considered that significant in-combination effects on European sites are not likely to occur as a result of the proposed works in combination with other plans or projects.

8 Screening Conclusion

In view of best scientific knowledge, this report concludes that the provision of the proposed replacement of the existing pedestrian bridge over the Mill Stream to the rear of the PESS building within the University of Limerick campus, individually or in combination with another plan or project,

[6] Assessment of Plans and Projects Significantly Affecting European sites: Methodological Guidance on the Provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (European Commission Environment Directorate-General, 2001)

will not have a significant effect on any European sites. This conclusion was reached without considering or taking into account mitigation measures or measures intended to avoid or reduce any impact on European sites.

It is considered that this report provides sufficient relevant information to allow Limerick City and County Council to carry out an Appropriate Assessment Screening, if necessary, and reach a determination that the proposed works will not have any likely significant effects on European sites under Article 6 of the Habitats Directive in light of their conservation objectives.

9 References

- Chartered Institute of Ecology and Environmental Management (CIEEM) (2024). *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine (Version 1.3).*
- DoEHLG (2010a). *Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities.*
- DoEHLG (2010b). Circular NPW 1/10 & PSSP 2/10: Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities.
- DoHLGH (2025). EIA Portal.
- European Commission (2021). *Assessment of plans and projects in relation to Natura 2000 sites- Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC.*
- European Commission (2018). *Managing Natura 2000 sites: The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC.*
- European Commission Environment Directorate-General (2021). *Guidance document on the strict protection of animal species of Community Interest under the Habitats Directive.*
- NBDC (2025). Biodiversity Maps.
- NPWS (2021). Guidance for Public authorities on the Application of Articles 12 and 16 of the EU Habitats Directive to development/works undertaken by or on behalf of a Public authority.
- NPWS (2024). *Boundary data – Special Area of Conservation (SAC).* [Update date 06/12/2024].
- NPWS (2024). *Boundary data – Special Protection Area (SPA).* [Update date 11/01/2024].
- NPWS (2015). *Boundary data – proposed Natural Heritage Area (pNHA)*. [Update date 01/11/2015].
- NPWS (2019). *Boundary data –Natural Heritage Area (pNHA)*. [Update date 28/06/2019].
- NRA[7] (2009). *Guidelines for Assessment of Ecological Impacts of National Road Schemes.*
- Limerick City and County Council (2022). *Limerick Development Plan 2022-2028.*
- OPR (2021). *Practice Note PN01 Appropriate Assessment Screening for Development Management.*
- Wyse Jackson, M., FitzPatrick, Ú., Cole, E., Jebb, M., McFerran, D., Sheehy Skeffington, M. & Wright, M. (2016). *Ireland Red List No. 10: Vascular Plants.* Dublin Ireland: NPWS, Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs.

[7] Now Transport Infrastructure Ireland (TII).

Appendix I: Background

The European[8] network is a Europe-wide network of ecologically important sites (SPAs and cSACs – also known as 'European Sites' or 'Natura 2000 sites') that have been designated for protection under either the EU Birds Directive (Council Directive 79/409/EEC on the Conservation of Wild Birds) or the EU Habitats Directive (Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Flora and Fauna).

The main aim of the Habitats Directive is *"to contribute towards ensuring biodiversity through the conservation of natural habitats of wild fauna and flora in the European territory of the Member States to which the treaty applies".* Any actions taken must be designed to *"maintain or restore, at a favourable conservation status, natural habitats and species of wild fauna and flora of Community interest".* Under Article 6 of the Habitats Directive, an assessment is required where a plan or project is not directly connected with or necessary to the management of a European Site but may give rise to significant effects upon a European site.

In addition, it is a matter of law that candidate SACs (cSACs), candidate SPAs (cSPAs) and Sites of Community Importance (SCI) are considered in this process and treated the same as SACs and SPAs.

Article 6 (paragraphs (3) and (4)) of the Habitats Directive states that:

> (3) Any plan or project not directly connected with or necessary to the management of the site but likely to have significant effect thereon, either individually or in combination with other plans or projects, shall be subject to Appropriate Assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.
>
> (4) If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of a social or economic nature, the Member State shall take all compensatory measures necessary to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted.
>
> Where the site concerned hosts a priority natural habitat type and/or a priority species, the only considerations which may be raised are those relating to human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest.

The requirements of the Habitats Directive are transposed into Irish law by means of the *European Union (Birds and Natural Habitats) Regulations 2011-2021* (hereafter referred to as the *Birds and Habitats Regulations*)[9] and by the *Planning and Development Act 2000*, as amended.

In Ireland, the statutory agency responsible for the designated areas is NPWS.

[8] The EU Habitats Directive, Article 3.1, states "*A Coherent European ecological network of Special Areas of Conservation and Special Protection Areas pursuant to Directive 79/409/EEC shall be set up under the title Natura 2000*"
[9] SI No. 477 of 2011 and subsequent amendments

Stages in the Assessment

European Commission guidance (2021)[10] sets out the principles on how to undertake decision making in applying the Habitats Directive. The requirements of the Habitats Directive comprise three distinct stages":

Stage one: screening. The first part of the procedure consists of a pre-assessment stage ('screening') to ascertain whether the plan or project is directly connected with, or necessary to, the management of a Natura 2000 site, and, if this is not the case, then whether it is likely to have a significant effect on the site (7) (either alone or in combination with other plans or projects) in view of the site's conservation objectives. Stage one is governed by the first part of the first sentence of Article 6(3).

Stage two: the appropriate assessment. If likely significant effects cannot be excluded, the next stage of the procedure involves assessing the impact of the plan or project (either alone or in combination with other plans or projects) against the site's conservation objectives, and ascertaining whether it will affect the integrity of the Natura 2000 site, taking into account any mitigation measures. It will be for the competent authorities to decide whether or not to approve the plan or project in light of the findings of the appropriate assessment. Stage two is governed by the second part of the first sentence and the second sentence of Article 6(3)..

Stage three: derogation from Article 6(3) under certain conditions. The third stage of the procedure governed by Article 6(4). It only comes into play if, despite a negative assessment, the developer considers that the plan or project should still be carried out for imperative reasons of overriding public interest. This is only possible if there are no alternative solutions, the imperative reasons of overriding public interest are duly justified, and if suitable compensatory measures are adopted to ensure that the overall coherence of Natura 2000 is protected.

[10] *Assessment of Plans and Projects in relation to Natura 2000 sites: Methodological Guidance on the Provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (European Commission Environment Directorate-General, September 2021)*

Appendix II: Conservation Objectives of European Sites

The conservation objectives for a European Site are intended to represent the aims of the Habitats and Birds Directives in relation to that site. To this end, habitats and species of European Community importance should be maintained or restored to 'favourable conservation status' (FCS), as defined in Article 1 of the Habitats Directive below[11]:

The conservation status of a natural habitat will be taken as 'favourable' when:

- its natural range and the area it covers within that range are stable or increasing, and
- the specific structure and functions which are necessary for its long term maintenance exist and are likely to continue to exist for the foreseeable future, and
- the conservation status of its typical species is favourable as defined (i).

The conservation status of a species will be taken as favourable when:

- population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats, and
- the natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future, and
- there is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis.

The 2019 Guidance from the European Commission[12] indicates that the general objective of achieving FCS for all habitat types and species listed in Annexes I and II to the Habitats Directive needs to be translated into site-level conservation objectives.

The European Commission guidance recommends that screening should fulfil the following steps:

1. ascertaining whether the plan or project is directly connected with or necessary to the management of a Natura 2000 site;
2. identifying the relevant elements of the plan or project and their likely impacts;
3. identifying which (if any) Natura 2000 sites may be affected, considering the potential effects of the plan or project alone or in combination with other plans or projects;
4. assessing whether likely significant effects on the Natura 2000 site can be ruled out, in view of the site's conservation objectives.

[11] https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A01992L0043-20130701
[12] Managing Natura 2000 sites: the provisions of Article 6 of the Habitats Directive 92/43/EEC. (European Commission 2019)

Brady Shipman Martin

DUBLIN
Mountpleasant Business Centre
Mountpleasant Avenue
Dublin 6

CORK
Penrose Wharf Business Centre
Penrose Wharf
Cork

+353 1 208 1900
mail@bradyshipmanmartin.com
www.bradyshipmanmartin.com

CS CONSULTING
Civil, Structural & Traffic Engineering

Planning, Environment and Place-Making
Limerick City and County Council
Dooradoyle Road, Dooradoyle, Limerick
V94 WV78

Sent By: Email
Job Ref: U087L
A – HY, GL
Date: 24-Nov-25

RE: Further Information Response in Relation to Planning Reference EC/194/25 at University of Limerick Campus.

INTRODUCTION

This Further Information Response document has been prepared by Cronin & Sutton Consulting Engineers (CS Consulting) on behalf of the applicant University of Limerick, in relation to Section 5 Application under Planning Reference EC/194/25 for the proposed replacement of the Mill Stream Bridge Pedestrian Bridge at the University of Limerick Campus.

This document addresses items 1, 2, 3, 4 of the Requests for Further Information (RFI) issued on the 14tt of October 2025 by Limerick City and County Council (LCCC) in respect of the above proposed works application.

ITEM 1 OF THE REQUEST FOR FURTHER INFORMATION

A site-specific otter survey must be undertaken by a suitably qualified ecologist to determine the presence or absence of active otter holts within the recognised disturbance zone. If holts are identified, a derogation licence may be required and should be addressed accordingly.

RESPONSE TO ITEM 1 OF THE RFI

Please find appended a Site Survey Report from Brady Shipman Martin Ltd confirming no otter holts are present at or adjacent to the area of works.

ITEM 2 OF THE REQUEST FOR FURTHER INFORMATION

The ecological report should be revised to include clear and detailed information on the construction and demolition methodology, specifically how the steel bridge components will be cut and removed. The potential environmental risks associated with the use of cutting equipment near the watercourse must be addressed.

RESPONSE TO ITEM 2 OF THE RFI

Please find included under separate cover an updated Ecological Report from Brady Shipman Martin Ltd.

Refer to drawing number L087L-CSC-XX-XX-DR-C-0102 which outlines the bridge replacement methodology.

ITEM 3 OF THE REQUEST FOR FURTHER INFORMATION

Clarification is required on whether a site compound or associated facilities will be used during the works. If so, the location, size, and composition of the compound must be clearly identified and assessed in terms of environmental impact.

RESPONSE TO ITEM 3 OF THE RFI

We confirm no site compound or site facilities shall be provided during the works.

It is envisaged the works shall be completed in one working day. The existing bridge shall be uncoupled from its existing foundations, lifted and removed by mobile crane and removed from site.

The new bridge shall then be lifted and placed into position by mobile crane and tied back into the existing foundations.

During the course of the working day, UL have confirmed existing campus facilities shall be made available for use to all construction workers.

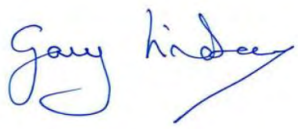
ITEM 4 OF THE REQUEST FOR FURTHER INFORMATION

Given the presence of Himalayan balsam (Impatiens glandulifera) adjacent to the bridge, the applicant must provide details of the measures that will be taken to prevent the spread of this invasive species during the removal and replacement of the bridge.

RESPONSE TO ITEM 4 OF THE RFI

Please find appended a method statement from Brady Shipman Martin Ltd for control measures to be implemented when working in the vicinity of Himalayan Balsam.

We trust the above and attached are in order, should you have any queries please do not hesitate to contact the undersigned.



Gary Lindsay

Associate Director

Chartered Engineer

For the Cronin & Sutton Consulting Group

UNIVERSITY OF LIMERICK
OLLSCOIL LUIMNIGH

Limerick City and County Council
County Hall
Dooradoyle
Limerick
Ireland

[redacted]

REMITTANCE ADVICE Electronic Transfer

Supplier Number	2635
Pay Date	12/09/2025
Page	1/1

Inv Date	Your Ref	Description	Our Ref	AMOUNT EUR	Payable EUR
27/08/2025	P240027		4413173	80.00	80.00
			PAGE TOTAL EUR	80.00	80.00
			GRAND TOTAL EUR	80.00	80.00

PAYMENT ACCOUNT DETAILS

BIC CODE	[redacted]
IBAN NUMBER	
ACCOUNT NAME	

Brady Shipman Martin.
Built. Environment.

Project:	**Proposed replacement of the Mill Stream Pedestrian Bridge at the University of Limerick Campus**
LCCC Reg. Ref.:	**EC/194/25**
Subject:	**Declaration under Section S – Response to a Request for Further Information**
Report date:	**24 November 2025**

Background

The University of Limerick (UL) intends to replace an existing pedestrian bridge over a small channel, known as the Mill Stream, located near to the southern bank of the River Shannon, at the rear of the Physical Education and Sports Sciences (PESS) building, on the main campus of the University of Limerick. The bridge is in a state of disrepair and can no longer be safely used.

UL submitted an application for a Section 5 declaration to the planning authority in September 2025. The application included an Appropriate Assessment Screening Report (Brady Shipman Martin) as well as details on the proposed bridge replacement works (CS Consulting).

Further Information Request

The FI request comprised four separate but related points, as follows:

- A site-specific otter survey must be undertaken by a suitably qualified ecologist to determine the presence or absence of active otter holts within the recognised disturbance zone. If holts are identified, a derogation licence may be required and should be addressed accordingly.
- The ecological report should be revised to include clear and detailed information on the construction and demolition methodology, specifically how the steel bridge components will be cut and removed. The potential environmental risks associated with the use of cutting equipment near the watercourse must be addressed.
- Clarification is required on whether a site compound or associated facilities will be used during the works. If so, the location, size, and composition of the compound must be clearly identified and assessed in terms of environmental impact.
- Given the presence of Himalayan balsam (*Impatiens glandulifera*) adjacent to the bridge, the applicant must provide details of the measures that will be taken to prevent the spread of this invasive species during the removal and replacement of the bridge.

Response

In response to the FI request, UL has commissioned Brady Shipman Martin (as project ecologists) to resurvey the subject site, including to carry out a dedicated in-stream otter survey, and to provide details on requirements in relation to Himalayan balsam. UL has also requested further detail from CS Consulting (as project engineers) to provide further detail and clarification on the bridge replacement methodology.

Brady Shipman Martin.
Built. Environment.

This **Technical Note** has been prepared in response to a request for further information (FI) issued by Limerick City and County Council (14 October 2025). It forms part of the overall response to the FI request, prepared by CS Consulting on behalf of the applicant.

Point 1 – otter survey

- A site-specific otter survey must be undertaken by a suitably qualified ecologist to determine the presence or absence of active otter holts within the recognised disturbance zone. If holts are identified, a derogation licence may be required and should be addressed accordingly.

Background

The Mill Stream is a man-made channel, starting close to Kilmurry Village, c.350m to the east, running past the PESS building before turning away from the river near the Living Bridge and moving west, south of Dromroe Student Village for a distance before turning north to rejoin the river at Plassey Mill, some 800m to the west. The Mill Stream was constructed as a means of powering Plassey Mill, built in 1824, some 800m downstream of the pedestrian bridge.

The bridge is one of the few access points to the pathway and to the river itself – apart from this crossing, currently closed, the only other access points are some considerable distance away to the east and west.

As set out in the AA Screening Report submitted with the Section 5 application otters are protected under Article 12 of the EU Habitats Directive. The species is frequently recorded along the River Shannon and is listed as a qualifying interest (QI) species in the Lower River Shannon SAC (site code 002165). The AA Screening report states that there are no otter holts in the vicinity of the existing bridge – this conclusion was based on field surveys carried out by Brady Shipman Martin.

On 24 October 2025 and in response to the FI request a dedicated otter survey was undertaken at the site of the proposed bridge replacement works, by ecologists Matthew Hague CEnv MCIEEM and Sadye Goldfarb of Brady Shipman Martin. Matt (author of this technical note and lead ecologist with Brady Shipman Martin) is a highly experienced field ecologist and has been undertaking protected species surveys (specifically for large mammals such as badger and otter) for over 20 years. Sadye is also an ecologist with Brady Shipman Martin, specialising in wetland species and experienced undertaking survey work in complex conditions.

Survey

The survey undertaken in October 2025 was based on the methodologies set out in the NRA (TII) publications *Ecological Surveying Techniques for Protected Flora and Fauna during the Planning of National Road Schemes* and *Guidelines for the Treatment of otters prior to the Construction of National Road Schemes.* The guidelines provide a coherent and systematic approach to such survey work.

Otter survey work can be undertaken at any time of the year; however, it is best undertaken outside the summer period if there is heavy vegetation in the survey area. Late October, being the season available to undertake this work, is a good time to survey for otters.

As noted elsewhere in this submission, the proposed works are very minor and will take place over a very short period (one day). Nevertheless, as otters are a QI species in the Lower River Shannon SAC, and a European Protected species, on a very conservative basis, the project team defined the potential zone of influence of the proposed bridge replacement work as being a distance c. 25m upstream of the existing bridge, and c.100m downstream. These distances were chosen because they extend *significantly* beyond the likely zone of disturbance by machinery cutting the existing bolts and removing/replacing the bridge. Realistically there is no possibility of disturbance beyond the immediate working area.

Using safety equipment to facilitate safe working in an in-stream environment the survey team, starting at the eastern end, entered the stream via the wooded bank and walked slowly downstream. On entering the stream it was confirmed that despite the initial impression gained from viewing the bridge from the stream bank there is very little vegetation present in the immediate vicinity. On the eastern side of the existing structure, the vegetation is dominated by brambles (with some Himalayan balsam in places, see below). Downstream (to the west) the stream is more open with less vegetation.

Once instream, the stream banks, and the space under the bridge itself, were systematically searched for any signs of otter – signs such as holts or couches, but also more ephemeral signs such as spraints, anal jelly, slides and footprints.

Given the presence of bramble scrub on the eastern side of the bridge it was necessary to search through the vegetation by hand, while taking care not to disturb any Himalayan balsam (small amounts are present under the bridge). Once west of the bridge the vegetation opens up and it was not necessary to cut back or move any vegetation.

By this methodology (visually checking all parts of the in-stream channel, on both sides, as well as the stream banks) it was possible to comprehensively ascertain the presence/absence of signs of otters on the day of the survey.

In addition to the in-stream survey, which extended up- and down-stream of the bridge, the survey team also walked along, and examined, the entire Mill Stream – from its commencement at Kilmurry to where it re-enters the River Shannon at Plassey Mill.

Results

The in-stream survey confirmed the following key findings (see the photographs below (**Plates 1-8**):

- Despite extensive searches, including in the immediate vicinity of the proposed works and significantly outside the working area, no evidence of otter holts was recorded. The authors are satisfied that there is no otter holt present. Further, no evidence of otter activity was recorded, however this is not to say that otters do not use the Mill Stream at all – just that there is no holt, and no evidence that otters had been using the stream on the day of the survey or in the recent past. This includes the area underneath the north-side of the bridge which contains a small gap/setback between the top of the bank and the bridge deck (see Plate 3).
- The survey confirmed that the nature of the stream banks, particularly west of the bridge, is not favourable to otters intending to create a holt – they are solid, robust structures constructed of stone, providing no suitable crevices or holes that an otter could use. The banks are also very steep (see plates 4 and 5) and, west of the bridge, very exposed.
- No evidence of otter activity was noted at any point along the Mill Stream (although it is accepted that otter activity is likely in the wider area). In addition, no evidence of otter activity was noted in the small stream/ditch on the western side of the PESS building. This unnamed, manmade channel joins the Mill Stream just on the western side of the pedestrian bridge.

Conclusion in relation to otter holts

Based on the research undertaken, and the site survey carried out, the authors are satisfied that there is no otter holt within the zone of influence of these minor works. It is likely that otters use the stream for commuting and it is therefore recommended that a survey be undertaken prior to the works being undertaken – this is considered a best practice approach to work in the vicinity of any stream – given the absence of otter holts this is not mitigation in the context of a European site (and Appropriate Assessment).

Point 2 – Construction and Demolition methodology

- The ecological report should be revised to include clear and detailed information on the construction and demolition methodology, specifically how the steel bridge components will be cut and removed. The potential environmental risks associated with the use of cutting equipment near the watercourse must be addressed.

CS Consulting, as project engineers, has provided detail on the precise bridge removal and replacement process. See the documentation submitted separately, specifically CS drawing L087L-CSC-XX-XX-DR-C-0102. The engineers have also confirmed that the works shall be completed in one day. See response below (Point 4).

Given the very minor extent and straightforward nature of the works proposed, there is no possibility of there being any environmental impacts, whether they be temporary, short term or permanent. None of the works proposed, which include the removal of existing bolt fixings, the lifting off of the existing dilapidated bridge and the placing/fixing of the new bridge onto the existing concrete piers will result in any significant effects on any ecological receptor.

Should it be necessary to cut the bolts to release the bridge – this work will be undertaken by hand using a suitable cutting tool. This work, if required, will take no more than a few minutes to carry out, and will release no contaminants.

There is no possibility of any spillage of any material or pollutant of any kind into the Mill Stream (or anywhere else) and there is simply no likelihood of any environmental impacts of any kind.

Point 3 – Site compound/facilities

- Clarification is required on whether a site compound or associated facilities will be used during the works. If so, the location, size, and composition of the compound must be clearly identified and assessed in terms of environmental impact.

CS Consulting, as project engineers, has confirmed the following (refer to the CS Consulting cover letter/report:

We confirm no site compound or site facilities shall be provided during the works.

It is envisaged the works shall be completed in one working day. The existing bridge shall be uncoupled from its existing foundations, lifted and removed by mobile crane and removed from site.

The new bridge shall then be lifted and placed into position by mobile crane and tied back into the existing foundations.

During the course of the working day, UL have confirmed existing campus facilities shall be made available for use to all construction workers.

As project ecologists Brady Shpiman Martin is satisfied that there is no possibility of an environmental impact from the proposed works.

Point 4 – Himalayan balsam

- Given the presence of Himalayan balsam (*Impatiens glandulifera*) adjacent to the bridge, the applicant must provide details of the measures that will be taken to prevent the spread of this invasive species during the removal and replacement of the bridge.

Himalayan balsam is ubiquitous in this part of the River Shannon. It is also present downstream of the works area – and is thriving in places. The plant is spread by seed dispersal, and seeds develop over the summer months, between June and August.

Given the nature and scale of the work which will effectively take one day to complete, there is no likelihood that the works will cause Himalayan balsam or any other Third Schedule invasive species to be spread. Nevertheless, good procedure would require the personnel undertaking the work to be competent and to both recognise and know how to prevent the spread of Himalayan balsam and other species.

Appendix I of this note contains information on Himalayan balsam, and general best practice measures to prevent its spread. To reiterate, following best practice is not a mitigation measure in the context of the River Shannon SAC, particularly in an area where the plant is already present.

The reason for these procedures is to prevent the spread of invasive species off site (e.g. to the contactor's depot and beyond), rather than causing the species to spread downstream (it is already present downstream in the Mill Stream).

Conclusion

Brady Shipman Martin, as project ecologists and environmental advisors to the University of Limerick, are satisfied that there is no possibility of any significant effect on any European site including the River Shannon SAC as a result of the proposed bridge replacement works. There will be no impacts on otter holts, which are not present, and there is also no possibility that the proposed works could spread, or cause to be spread, Himalayan balsam or any other Third Schedule invasive species.

Plates

Plate 1: The existing bridge is a lightweight structure bolted to existing concrete piers. Viewed from the east.

Plate 2: The underside of the existing bridge

Plate 3: View to the north side under the bridge

Plate 4: canal-like western side of the stream, looking west – note the steep sides and lack of opportunities for holt construction

Plate 5: Vertical, stone stream banks

Plate 6: Another view of the stream bank west of the bridge

Plate 7. View of a replacement bridge installed by LCCC, near where the Mill Stream enters the River Shannon

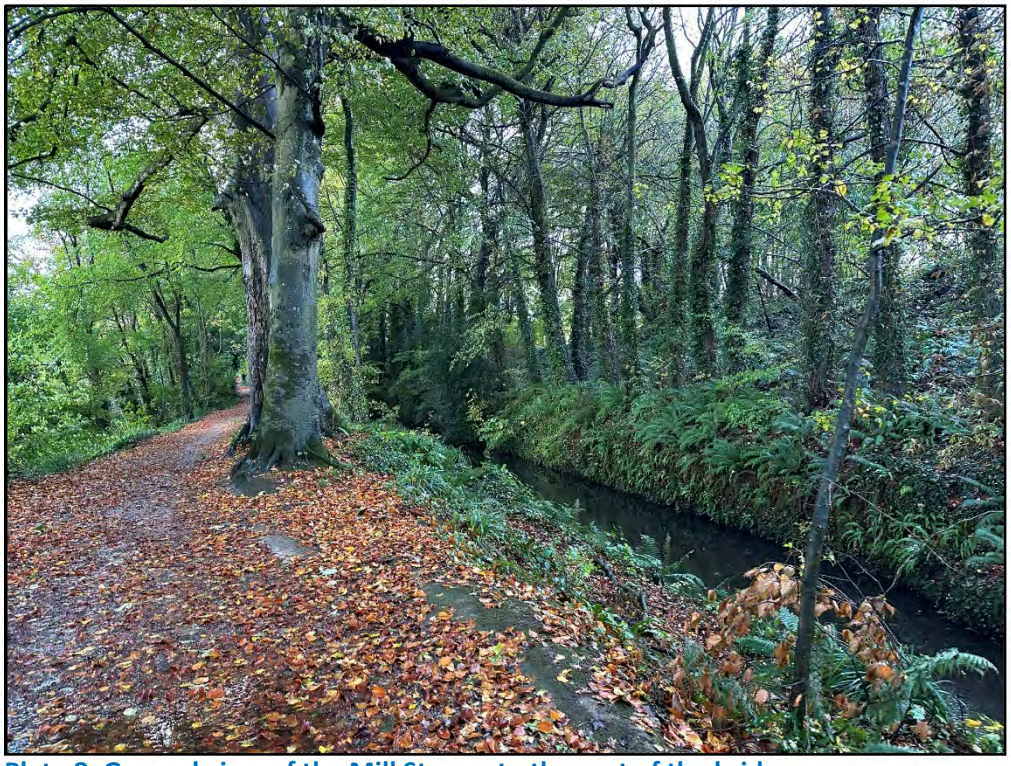


Plate 8: General view of the Mill Stream to the east of the bridge

Appendix I – general notes on best practice (Himalayan Balsam)

See also https://species.biodiversityireland.ie/profile.php?taxonId=28772

Himalayan balsam

Himalayan balsam (*Impatiens glandulifera*) is listed on the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations (2011 as amended).

Himalayan balsam is an annual plant, it spreads by seed dispersal. Individual plants can produce over 800 seeds per year, contained in exploding seed pods which can propel/disperse seeds up to 6 metres from plants. Seeds can be spread over greater distances by various mean including water flow (the seeds float) and through human activity (e.g. attached to vehicles, clothing and footwear). In order to germinate, the seeds require a period of cold stratification. Himalayan balsam generally persists in the soil for 18 - 24 months, however, seeds have been reported to persist up to 3 years.

Himalayan balsam seedlings can be identified at most times of the year. March - June seedlings can be identified by their pinkish stems, leaf shape and short root structure. From July - September they can also be identified by their flowers and height. In winter, areas of Himalayan balsam can be identified by hay like remains.

Control Methods

Hand pulling of Himalayan balsam is considered to be the most effective treatment option for smaller stands as the species is shallow rooted (10-15cm).

Hand pulling should be carried out in late April or May when plants can be easily identified but will not have developed seedpods. The plant stems should be gripped 0.5 metres above ground and carefully pulled which will normally remove the entire root. While the species does not spread by vegetative means, e.g. from fragments of root or stem, uprooted plants left in moist conditions can re-root from nodes on the stem. The plants removed should be placed in an area away from any watercourses and covered with jute material. By blocking out light the plants will degrade naturally, eliminating the potential to re root or set seed. The infested area should be regularly monitored for new growth during this time. It is still possible to hand-pull isolated plants after May, but the plant tops should be covered with a plastic bag to prevent seed spread.

If no suitable area can be found, bagging of plant material can be utilised. The bagged plants should then be placed in a designated area in order to decay, for a period of up to 24 months, or removed for off-site disposal at a licensed landfill site.

Chemical treatment should be avoided due to the proximity of the adjoining watercourse (i.e. the Mill Stream).

Biosecurity

It will be necessary to adhere to full biosecurity protocols at all times during the bridge replacement works to ensure that Himalayan balsam is not spread inadvertently by the works – particularly off site. Construction equipment and materials, including vehicles, clothing and footwear, have the potential to act as vectors for the spread of invasive plant species.

It is very important that the plants are not disturbed when seed pods are visible (mid-June onwards), Other biosecurity measures shall include:

- Where possible, fence off or clearly mark infested area including the extent of the potential seed dispersal zone (i.e. 7m around the plants), Do not allow vehicle/machinery/personnel access to the infested area, if possible, unless required for treatment. If access is required, then decontamination measures below must be followed.

Comhairle Cathrach & Contae **Luimnigh**

Limerick City & County Council

Report on application under Section 5 of the Planning and Development Act 2000 (as amended)

File Reference number	EC-194-25
Applicant	University of Limerick
Location	Limerick Campus

1.0 Description of Site and Surroundings:

Existing bridge on the north east edge of the University of Limerick Campus.

2.0 Proposal:

This is an application requesting a Section 5 Declaration on whether the following works are or are not development or are or not exempted development:

- Replacement of the Millstream bridge.

This Section 5 declaration includes the following:

- Site location & site layout map
- Proposed access route
- Existing bridge plans and sections
- Existing bridge photographs
- New bridge plans and section
- AA Screening Report

Within the submitted cover letter the applicant has stated that the proposed development falls under class 13 of Part 1 of Schedule 2 of the Planning and Development Regulations 2001 (as amended).

3.0 Planning History:

Whilst there are numerous applications within the grounds of UL, there are none in relation to the existing bridge.

3.1 Enforcement History
N/A

4.0 Assessment

Consideration as to whether a development constitutes exempted development or not is governed by Sections 4 and 5 of the Planning and Development Act 2000 (as amended)

and Articles 5, 6, 7, 8, 9, 10 and 11 of the Planning and Development Regulations 2001 (as amended).

5.1 Is the proposal development?

Section 2(1) in this Act, except where otherwise requires –

'works' includes any act or operation of construction, excavation, demolition, extension, alteration, repair or renewal.

'structure' as any building, structure, excavation, or other thing constructed or made on, in or under any land, or part of a structure so defined, and –

(a) Where the context so admits, includes the land on, in or under which the structure is situated.

Section 3(1) defines '**development**' as 'the carrying out of any works on, in, over or under land or the making of any material change in the use of any structures or other land'.

The proposed development on site, comprising the replacement of a bridge, constitutes 'works' and 'development'.

5.2 Is the proposal exempted development?

The applicant has stated that the proposed works would fall under Class 13 of Part 1 Schedule 2 of the Planning and Development Regulations 2001 (as amended). However, I do not consider that the proposed development should be evaluated under Class 13 of Part 1 Schedule 2 of the Planning and Development Regulations 2001 (as amended):

"The repair or improvement of any private street, road or way, being works carried out on land within the boundary of the street, road or way, and the construction of any private footpath or paving.

The width of any such private footpath or paving shall not exceed 3 metres."

I do however consider that the proposed development may be exempted development under Article 4(1)(h) of the Planning and Development Act 2000 (as amended), which reads:

"Exempted development.

4.—(1) The following shall be exempted developments for the purposes of this Act—

(h) development consisting of the carrying out of works for the maintenance, improvement or other alteration of any structure, being works which affect only the interior of the structure or which do not materially affect the external appearance of the structure so as to render the appearance inconsistent with the character of the structure or of neighbouring structures;"

It is considered that the replacement bridge structure is a like for like replacement in terms of appearance and that the works can be considered as an improvement and alteration of the existing structure. However, given the location of the bridge within the Lower River Shannon SAC, the ecological implications are a key consideration which are covered in section 6.0 below.

5.0 Article 9 Restrictions

The proposed development is not restricted by any of the restrictions in Article 9 of the Planning and Development Regulations 2001 (as amended).

6.0 Appropriate Assessment

Submitted with the application is an AA Screening Report. This report concludes with the following recommendation:

- The proposed bridge replacement will not have a significant effect on any European sites.

This screening report has been assessed by the Local Authority's Ecologist who has made the following comments (full report appended):

The application submitted by the University of Limerick proposes the replacement of an existing bridge that is currently in a dangerous condition and has been closed for some time. The works are described as straightforward, involving the removal of the existing bridge using a crane and the installation of a replacement structure. No excavation, vegetation removal, or works to the Mill Stream are proposed, and the works are expected to be completed within a short timeframe.

However, the ecological report submitted in support of the application has been found to lack sufficient detail. Concerns were raised regarding the absence of a site visit by a qualified ecologist to assess the presence of otter holts within the disturbance zone, particularly as the survey was conducted outside the optimal season. Additionally, the method of steel removal is not specified, raising potential environmental risks if methods such as acetylene torches are used near the watercourse. The report also fails to provide information on whether a site compound will be required and, if so, its location and composition. Furthermore, given the presence of Himalayan balsam adjacent to the bridge, no measures have been outlined to prevent its spread during the removal process.

As a result, further information is required to address these gaps before the application can be fully assessed. This includes an otter survey by a qualified ecologist, clarification on construction methods, details of any site compound, and measures to prevent the spread of invasive species.

7.0 Environmental Impact Assessment

An EIA Screening report is attached to this report. The screening has had regard to the nature, size and location of the proposed development and to the criteria set out in Schedule 7 of the Regulations it has been concluded at preliminary examination that there is no real likelihood of significant effects on the environment arising from the proposed development. EIA, therefore, is not required.

8.0 Conclusion

The proposed bridge replacement works, as described in the application and accompanying documentation, appear to fall within the general scope of Section 4(1)(h) of the Planning and Development Act 2000 (as amended). However, based on the information currently available, there are several outstanding issues that must be addressed before a definitive conclusion can be reached regarding the exempted development status of the proposal.

Namely, the ecological assessment lacks sufficient detail to rule out potential impacts on protected species and habitats.

Accordingly, it is not possible at this time to confirm that the proposed works constitute exempted development under Section 4(1)(h) of the Planning and Development Act 2000 (as amended).

9.0 Recommendation

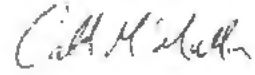
Further information is requested

- A site-specific otter survey must be undertaken by a suitably qualified ecologist to determine the presence or absence of active otter holts within the recognised disturbance zone. If holts are identified, a derogation licence may be required and should be addressed accordingly.

- The ecological report should be revised to include clear and detailed information on the construction and demolition methodology, specifically how the steel bridge components will be cut and removed. The potential environmental risks associated with the use of cutting equipment near the watercourse must be addressed.

- Clarification is required on whether a site compound or associated facilities will be used during the works. If so, the location, size, and composition of the compound must be clearly identified and assessed in terms of environmental impact.

- Given the presence of Himalayan balsam (*Impatiens glandulifera*) adjacent to the bridge, the applicant must provide details of the measures that will be taken to prevent the spread of this invasive species during the removal and replacement of the bridge.

Assistant Planner	Cathal McMullan	**Date:** 13/10/2025
Signature:		
A/Senior Planner	**Barry Henn**	**Date:** 14/10/2025
Signature		

Appendix 1: AA PN01 Screening Form

STEP 1: Description of the project/proposal and local site characteristics:	
(a) **File Reference No:**	EC-194-25
(b) **Brief description of the project or plan:**	Replacement of the Millstream bridge
(c) **Brief description of site characteristics:**	North east edge of the University of Limerick Campus. Currently bridge is closed to the public.
(d) **Relevant prescribed bodies consulted: e.g. DHLGH (NPWS), EPA, OPW**	N/A
(e) **Response to consultation:**	N/A

STEP 2: Identification of relevant Natura 2000 sites using Source-Pathway-Receptor model and compilation of information on Qualifying Interests and conservation objectives.				
European Site (code)	**List of Qualifying Interest/Special Conservation Interest [1]**	**Distance from proposed development [2] (km)**	**Connections (Source-Pathway-Receptors)**	**Considered further in screening Y/N**
002165- Lower River Shannon SAC	https://www.npws.ie/protected-sites/sac/002165	Within the boundary of SAC	Y	N
004077-River Shannon and River Fergus Estuaries SPA	https://www.npws.ie/protected-sites/sac/004077	4.7km	Y	N

STEP 3: Assessment of Likely Significant Effects	
(a) **Identify all potential direct and indirect impacts that may have an effect on the conservation objectives of a European site, taking into account the size and scale of the project under the following headings:**	
Impacts:	**Possible Significance of Impacts: (duration/Magnitude etc)**
Construction phase e.g - Vegetation clearance - Demolition - Surface water runoff from soil excavation/infill/landscaping (including borrow pits) - Dust, noise, vibration - Lighting disturbance - Impact on groundwater/dewatering - Storage of excavated/construction materials - Access to site - Pests	The proposed pedestrian bridge replacement works are described as minor in scale and short in duration. However, based on the ecological review, further clarification is required to fully assess the potential for significant effects. The following construction-related impacts have been considered: Vegetation Clearance: No vegetation clearance is proposed as part

	of the works. However, the presence of Himalayan balsam (Impatiens glandulifera) adjacent to the bridge introduces a risk of inadvertent spread of this invasive species during removal and replacement activities. measures to prevent this must be confirmed. Demolition: The removal of the existing bridge structure involves cutting steel connections and lifting the bridge using a crane. The method of steel cutting has not been specified. If hot works (e.g. acetylene torches) are used, there is a potential risk of molten metal entering the adjacent Mill Stream, which could impact water quality and aquatic species. This represents a gap in the current assessment. Surface Water Runoff: Although no excavation or infill is proposed, the lack of detail on construction methods and material handling introduces uncertainty regarding the potential for contaminated runoff. This is particularly relevant given the proximity to the Mill Stream and the Lower River Shannon SAC. Dust, Noise, Vibration: These impacts are expected to be temporary and minor. However, without confirmation of the construction methods and duration, the potential for disturbance to mobile species such as otters cannot be fully ruled out. Lighting Disturbance: No artificial lighting is proposed, and no night-time works are planned. This reduces the likelihood of disturbance to nocturnal species. Impact on Groundwater / Dewatering: No dewatering or groundwater interference is anticipated.

	Storage of Excavated / Construction Materials: The location and management of any site compound or material storage area has not been detailed. Without this information, the risk of accidental pollution or habitat disturbance cannot be excluded. Access to Site: Access is proposed via existing amenity grass areas. However, the location of the crane and any compound must be clarified to ensure no indirect impacts on sensitive habitats or species. Pests: No waste or conditions likely to attract pests are expected to arise during the works. Due to the lack of clarity on key aspects of the construction methodology, potential impacts on protected species (notably otters), and the presence of invasive species adjacent to the works area, the current information does not allow for a conclusive screening determination. Further ecological input and mitigation detail are required to ensure that the project will not result in significant effects on the qualifying interests of the Lower River Shannon SAC or the River Shannon and River Fergus Estuaries SPA.
Operation phase e.g. - Direct emission to air and water - Surface water runoff containing contaminant or sediment - Lighting disturbance - Noise/vibration - Changes to water/groundwater due to drainage or abstraction - Presence of people, vehicles and activities - Physical presence of structures (e.g collision risk) - Potential for accidents or incidents	Following completion of the pedestrian bridge replacement, the operational phase will involve passive use of the structure by pedestrians only. While the bridge replaces an existing structure and is not expected to introduce new pressures, the following potential impacts have been considered. Direct Emissions to Air and Water: There will be no emissions to air or water during the operational phase. The bridge is a passive structure and does not involve any mechanical or powered elements. Surface Water Runoff Containing Contaminants or Sediment: The bridge does not introduce any new impermeable surfaces or drainage infrastructure. However, given the proximity to the Mill Stream and the

	presence of invasive Himalayan balsam nearby, ongoing monitoring may be warranted to ensure no indirect impacts arise from increased footfall or maintenance activities. Lighting Disturbance: No artificial lighting is proposed as part of the bridge design. This eliminates the risk of lighting-related disturbance to nocturnal species such as otters or bats. Noise / Vibration: Use of the bridge will be limited to pedestrian traffic, which will not generate significant noise or vibration. The structure is not expected to alter the existing acoustic environment. Changes to Water / Groundwater Due to Drainage or Abstraction: No changes to drainage, water abstraction, or groundwater interaction are proposed or anticipated. Presence of People, Vehicles and Activities: The bridge will restore pedestrian connectivity across the Mill Stream. While this may result in a slight increase in foot traffic compared to the current situation (where the bridge is closed), the level of activity is expected to remain consistent with historic use and is not considered significant in terms of disturbance to local fauna. Physical Presence of Structures (e.g. Collision Risk): The replacement bridge will occupy the same footprint as the previous structure and does not pose a collision risk to wildlife. It does not obstruct movement corridors for species such as otters or birds. Potential for Accidents or Incidents: The operational phase presents a negligible risk of pollution or accidents. No hazardous materials are associated with the structure, and its passive nature limits the potential for environmental incidents.

	The operational phase of the proposed bridge is not expected to result in significant effects on the qualifying interests of the Lower River Shannon SAC or the River Shannon and River Fergus Estuaries SPA. However, due to the ecological sensitivities of the site and the presence of invasive species, appropriate monitoring measures should be confirmed during the construction phase to ensure no indirect impacts arise post-completion.
In-combination/Other	At this stage, the potential for significant effects arising from the proposed bridge replacement works alone cannot be fully ruled out due to identified gaps in the ecological assessment, particularly regarding the presence of otters and the management of invasive species. As such, a precautionary approach must be taken. However, based on the information currently available, there are no known plans or projects in the immediate vicinity with overlapping construction timelines or spatial impacts that would give rise to likely significant in-combination effects. Once the outstanding ecological and construction-related clarifications are addressed through further information, a more definitive conclusion on in-combination effects can be made.

(b) **Describe any likely changes to the European site:**	
Examples of the type of changes to give consideration to include: - Reduction or fragmentation of habitat area - Disturbance to QI species - Habitat or species fragmentation - Reduction or fragmentation in species density - Changes in key indicators of conservation status value (water or air quality etc) - Changes to areas of sensitivity or threats to QI - Interference with the key relationships that define the	At present, the proposed works cannot be confirmed to avoid all potential for direct or indirect changes to the ecological integrity of the Lower River Shannon SAC or the River Shannon and River Fergus Estuaries SPA. While the bridge replacement is intended to be minor in scale and short in duration, the absence of key ecological information introduces uncertainty Due to these uncertainties, it cannot be definitively concluded that the proposed works will not result in changes to key indicators of conservation status, such as water quality, or interfere with the

structure or ecological function of the site	ecological function of the site. Further ecological clarification and mitigation detail are required to rule out the potential for significant effects.

(c) **(Are '*mitigation*' measures necessary to reach a conclusion that likely significant effects can be ruled out at screening?**
☐ **Yes** ☒ **No**

STEP 4: Screening Determination Statement		
The assessment of significance of effects: Describe how the proposed development (alone or in-combination is/is not likely to have significant effects on European site (s) in view of its conservation objectives		
While the proposed bridge replacement is modest in scale and intended to be short in duration, the absence of key ecological information—particularly a site-specific otter survey and detailed construction methodology—introduces uncertainty regarding potential impacts on qualifying interest species and habitats. The proximity of the works to the Mill Stream, the potential for water quality impacts during demolition, and the presence of invasive Himalayan balsam adjacent to the works area further contribute to this uncertainty. Until these issues are addressed through the submission of further information, the assessment cannot rule out the possibility of significant effects on the conservation objectives of the relevant European sites. Therefore, the proposal cannot be screened out at this time, and additional ecological clarification is required to complete the Appropriate Assessment screening process.		
	Tick as appropriate:	Recommendation:
(i) It is clear that there **is no likelihood** of significant effects on a European Site	☐	The proposal can be screened out: Appropriate Assessment not required.
(ii) It is **uncertain** whether the proposal will have a significant effect on a European Site	☒	☒ Request further information to complete screening ☐ Request NIS ☐ Refuse planning permission

(iii) **Significant effects** are likely	☐	☐ Request NIS ☐ Refuse planning permission
Signature and Date of Recommending Officer:	Cathal McMullan 13/10/2025	
Signature and Date of the Decision Maker:	B. Hanna 14/10/2025	

Appendix 2: EIA Screening

Establishing if the proposal is a *'sub-threshold development'*:	
Planning Register Reference:	EC-194-25
Development Summary:	Replacement of the Millstream bridge
Was a Screening Determination carried out under Section 176A-C?	☐ Yes. no further action required X No. Proceed to **Part A**

A. Schedule 5 Part I - Does the development comprise a project listed in Schedule 5. **Part 1.** of the Planning and Development Regulations 2001 (as amended)? (Tick as appropriate)		
☐	Yes. specify class: [insert here] _	**EIA is mandatory** No Screening required
X	No	Proceed to **Part B**

B. Schedule 5 Part 2 - Does the development comprise a project listed in Schedule 5, **Part 2,** of the Planning and Development Regulations 2001 (as amended) **and** does it meet/exceed the thresholds? (Tick as appropriate)		
X	No. the development is not a project listed in Schedule 5, Part 2	**No Screening required**
☐	Yes the project is listed in Schedule 5. Part 2 **and** meets/exceeds the threshold, specify class (including threshold): _[specify class & threshold here]_	**EIA is mandatory** No Screening required
☐	Yes the project is of a type listed **but** is *sub-threshold:* [insert here] _	Proceed to **Part C**

c. If Yes, has Schedule 7A information/screening report been submitted?	
☐ Yes, Schedule 7A information/screening report has been submitted by the applicant	**Screening Determination required**
☐ No, Schedule 7A information/screening report has not been submitted by the applicant	**Preliminary Examination required**

Signature and Date of Recommending Officer:	Cathal McMullan 13/10/2025
Signature and Date of the Decision Maker:	 14/10/2025

Appendix 3: Site photographs

Appendix 4: Internal Report

Comhairle Cathrach & Contae Luimnigh
Limerick City & County Council

Planning Exemption Application Internal Report

Planning Ref:

Applicant: UL

Development Description:

The University of Limerick intends to replace the existing bridge, which is now in a dangerous condition and has been closed for some time. The bridge replacement work is straightforward. It is proposed to simply cut the steel where it connects the bridge to its existing supports and then remove the bridge using a crane, which will be set up on the amenity grass area to the rear of the PESS building. Once this is done, the bridge abutments will be checked and made good, and minor repairs made if necessary. The new replacement bridge will then be installed using the crane. On completion of the works the crane will be removed and once safety checks are completed the new bridge will be opened to the public.

No vegetation removal or tree surgery will be required, and it is expected that the work will take no more than a day or two to complete. No excavation is required, no new drainage will be introduced, and no lighting is to be provided. There will be no works to the existing Mill Stream or to the drainage channel that enters the Mill Stream to the west of the bridge.

Report Prepared By: Seán Doyle, MSc., BSc. Hons - Ecologist.

Comments:

An AA screening was submitted in support of this application.

In the report p6 the following is found " In order to provide a baseline on the local ecological environment, a site visit was completed by Senior Landscape Architect George Dundon of Brady Shipman Martin on 10 July 2025". In order to establish if there are active otter holts within the recognised disturbance distance of the proposal, a site visit by a suitably qualified and experienced ecologist should be conducted. The survey was also conducted outside the optimal period for surveys of this type.

Lack of detail in the description of the works. On p7 of the report the following can be found "It is proposed to simply cut the steel where it connects the bridge to its existing supports and then remove the bridge using a crane, which will be set up on the amenity grass area to the

rear of the PESS building". There is no information provided as to how the steel will be cut. Will acetylene gas torches or angle grinders be used? The use of torches may result in molten metal entering the water of the stream. This lack of detail amounts to a lacunae and so this assessment cannot be considered to contain complete, precise, and definitive findings to remove all reasonable scientific doubt about the effects of a project on a protected site. Furthermore, the report suggests that "it is expected that the work will take no more than a day or two to complete". The short duration of the proposal is considered plausible but no detail is provided as to whether there will be a site compound and or associated facilities is and where this compound would be situated is provided.

Recommendation:

Prior to any grant of permission being issued the following should be sought by F.I.

- An otter survey undertaken by a suitably experienced and qualified ecologist should be conducted and a derogation licence sought if appropriate
- The report should be amended to provide clear detail on exactly what the construction/demolition phase of this proposal entail
- The report should be amended to include detail on location, size and composition of any site compound, if there is to be one
- Given that Himalayan balsam *Impatiens glandulifera* is growing directly adjacent to the bridge proposed for removal, detail on precautions taken to ensure that the species is not spread off site through the removal of the bridge should be provided

Signed: Seán Doyle MSc., BSc. Hons. - Ecologist **Date:** 13/10/2025

Comhairle Cathrach
& Contae Luimnigh

Limerick City
& County Council

Pleanáil, agus Cruthú Áite
Comhairle Cathrach agus Contae Luimnigh
Bothar Thuar an Daill
Tuar an Daill, Luimneach
V94 WV78

Planning and Place-Making
Limerick City and County Council
Dooradoyle Road
Dooradoyle, Limerick
V94 WV78

PLANNING & PLACE-MAKING

REG POST:

EC/194/25 **14 October 2025**

University of Limerick,
c/o Cronin Sutton Consulting,
19-22 Dame Street,
Dublin 2

RE: Declaration under Section 5

Dear Sir/Madam,

I refer to the above Section 5 Application you are hereby requested to submit the following further information:

- A site-specific otter survey must be undertaken by a suitably qualified ecologist to determine the presence or absence of active otter holts within the recognised disturbance zone. If holts are identified, a derogation licence may be required and should be addressed accordingly.

- The ecological report should be revised to include clear and detailed information on the construction and demolition methodology, specifically how the steel bridge components will be cut and removed. The potential environmental risks associated with the use of cutting equipment near the watercourse must be addressed.

- Clarification is required on whether a site compound or associated facilities will be used during the works. If so, the location, size, and composition of the compound must be clearly identified and assessed in terms of environmental impact.

- Given the presence of Himalayan balsam (*Impatiens glandulifera*) adjacent to the bridge, the applicant must provide details of the measures that will be taken to prevent the spread of this invasive species during the removal and replacement of the bridge.

Your application will not be further processed until confirmation of the above is received. A complete response should be submitted.

I hereby give you notice that the statutory period of three weeks during which the Planning Authority is required to give a decision will date from the receipt of a satisfactory response to the notice seeking further information.

Please quote your planning reference number on all correspondence EC/194/25.

Yours sincerely,

(for) Senior Planner,
Development Management

Tuar an Daill, Luimneach
Dooradoyle, Limerick

customerservices@limerick.ie
www.limerick.ie
@LimerickCouncil
061 - 556 000

Comhairle Cathrach & Contae **Luimnigh**

Limerick City & County Council

Report on application under Section 5 of the Planning and Development Act 2000 (as amended) – After FI

File Reference number	**EC-194-25**
Applicant	**University of Limerick**
Location	**NE Edge of the Limerick Campus, V94T9PX**

1.0 Previous Assessment:

Previous assessment concluded that the Planning Authority was not in a position to determine whether the proposed is or is not exempted development. This was due to the uncertainty of how the proposed development would impact the receiving environment. Specifically, the applicant was requested to provide further information on the following:

- A site-specific otter survey must be undertaken by a suitably qualified ecologist to determine the presence or absence of active otter holts within the recognised disturbance zone. If holts are identified, a derogation licence may be required and should be addressed accordingly.

- The ecological report should be revised to include clear and detailed information on the construction and demolition methodology, specifically how the steel bridge components will be cut and removed. The potential environmental risks associated with the use of cutting equipment near the watercourse must be addressed.

- Clarification is required on whether a site compound or associated facilities will be used during the works. If so, the location, size, and composition of the compound must be clearly identified and assessed in terms of environmental impact.

- Given the presence of Himalayan balsam (*Impatiens glandulifera*) adjacent to the bridge, the applicant must provide details of the measures that will be taken to prevent the spread of this invasive species during the removal and replacement of the bridge.

The Council ecologist has reviewed the documents, and their recommendations are appended to this report.

2.0 Submitted Documents:

In response the applicant has submitted:

- Cover letter from CS Consulting

- Bridge replacement methodology
- Updated site logistics plan
- Site survey report from Brady Shipman Martin

3.0 Assessment

Consideration as to whether a development constitutes exempted development or not is governed by Sections 4 and 5 of the Planning and Development Act 2000 (as amended) and Articles 5, 6, 7, 8, 9, 10 and 11 of the Planning and Development Regulations 2001 (as amended).

3.1 Is the proposal development?

As previously assessed, it is determined that:
The proposed development on site, comprising the replacement of a bridge, constitutes 'works' and 'development'.

3.2 Is the proposal exempted development?

The proposal was previously assessed under section 4(1)(h) of the Planning and Development Act 2000 (as amended), which reads:

"Exempted development.

4.—(1) The following shall be exempted developments for the purposes of this Act—

(h) development consisting of the carrying out of works for the maintenance, improvement or other alteration of any structure, being works which affect only the interior of the structure or which do not materially affect the external appearance of the structure so as to render the appearance inconsistent with the character of the structure or of neighbouring structures;"

The proposed development consists of the replacement of the existing bridge decking and guarding/handrail on a like for like basis. No work is proposed to the existing supporting buttresses/piers or foundations in the ground, these will remain unaltered.

As previously assessed, it is considered that the replacement bridge represents a like-for-like structure in terms of appearance. The works can therefore be regarded as an improvement and alteration of the existing bridge. However, due to the bridge's location within the Lower River Shannon SAC, the potential ecological impacts were identified as a key consideration, requiring additional information for a proper assessment.

Having reviewed the response to the further information request, I am satisfied that the replacement bridge will not materially alter its external appearance. My recommendation on this matter remains unchanged – the works are within the scope of section 4(1)(h).

4.0 Article 9 Restriction

Not applicable

5.0 Appropriate Assessment

An AA Screening examination was carried out by Limerick City & County Council (see appendix 1 in previous report). It was considered that further information was required to complete a screening assessment. An updated screening assessment is appended to this report based on all the information on file.

The following comments have been made by the Council Ecologist based on the submitted further information.

The response confirms that an otter survey was carried out by experienced ecologists in October 2025, covering approximately 25 metres upstream and 100 metres downstream of the existing bridge. This represents an improvement on the initial screening, which relied on a landscape architect. However, the survey does not meet the recognised 150-metre buffer for potential disturbance to otter holts. Despite this, given the limited scale, short duration, and nature of the proposed works—details of which were clarified in the further information response—it is reasonable to conclude that significant impacts on otter populations or holts can be ruled out. Issues relating to the duration and method of works, as well as the site compound, have been adequately addressed.

In relation to Himalayan Balsam, the report suggests that invasive species protection protocols may be excessive, arguing that the plant is already well established downstream of the site. While further spread is unlikely to be significant, the council agrees with the author's observation that the species spreads through seed dispersal. Given its established presence in the area, seeds contained in the soil could be transported offsite by machinery, potentially introducing the plant to uncolonised areas or other designated sites. As the future location of machinery cannot be confirmed, a control protocol should have been included as best practice to prevent inadvertent spread, which would constitute an offence under the Third Schedule.

Both the Council Ecologist and I are satisfied that the proposal can be screened out at this stage, as no significant ecological impacts are anticipated, provided that appropriate measures for invasive species control are implemented.

6.0 Environmental Impact Assessment

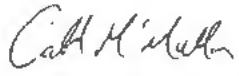
An EIA Screening examination was carried out by Limerick City and County Council (see Appendix 2 in previous report). Based on a preliminary examination of the proposal there is no real likelihood of significant effects on the environment and EIA is not required.

7.0 Conclusion/Recommendation

The proposed works as detailed on the application and plans submitted is considered to be within the section 4(1)(h) of the Planning and Development Act 2000 (as amended).

Regard has been had to –
(a) Section 2, 3 and 4 of the Planning and Development Act 2000 (as amended)
(b) Articles 5, 6, 7, 8, 9, 10 and 11 of the Planning and Development Regulations 2001 (as amended).
(c) The plans & particulars submitted with the application received on (17/09/2025 and 24/11/2025).

It is therefore considered that the said works are development and are exempted development under Article 4(1)(h) of the Planning and Development Act 2000 (as amended).

Assistant Planner	**Cathal McMullan**	**Date: 04/12/2025**
Signature:		
Senior Executive Planner	**Gráinne O'Keeffe**	**Date: 10/12/2025**
Signature		

Appendix 1: AA PN01 Screening Form

STEP 1: Description of the project/proposal and local site characteristics:	
(a) **File Reference No:**	EC-194-25
(b) **Brief description of the project or plan:**	Replacement of the Millstream bridge
(c) **Brief description of site characteristics:**	North east edge of the University of Limerick Campus. Currently bridge is closed to the public.
(d) **Relevant prescribed bodies consulted:** **e.g. DHLGH (NPWS), EPA, OPW**	N/A
(e) **Response to consultation:**	N/A

STEP 2: Identification of relevant Natura 2000 sites using Source-Pathway-Receptor model and compilation of information on Qualifying Interests and conservation objectives.				
European Site (code)	**List of Qualifying Interest/Special Conservation Interest [1]**	**Distance from proposed development [2] (km)**	**Connections (Source-Pathway-Receptors)**	**Considered further in screening Y/N**
002165- Lower River Shannon SAC	https://www.npws.ie/protected-sites/sac/002165	Within the boundary of SAC	Y	N
004077-River Shannon and River Fergus Estuaries SPA	https://www.npws.ie/protected-sites/sac/004077	4.7km	Y	N

STEP 3: Assessment of Likely Significant Effects	
(a) **Identify all potential direct and indirect impacts that may have an effect on the conservation objectives of a European site, taking into account the size and scale of the project under the following headings:**	
Impacts:	**Possible Significance of Impacts: (duration/Magnitude etc)**
Construction phase e.g - Vegetation clearance - Demolition - Surface water runoff from soil excavation/infill/landscaping (including borrow pits) - Dust, noise, vibration - Lighting disturbance - Impact on groundwater/dewatering - Storage of excavated/construction materials - Access to site	The proposed pedestrian bridge replacement works are now confirmed as minor in scale and will be completed within a single working day (previously unclear). Based on the ecological review and FI response, the following construction-related impacts have been reassessed:

- Pests	Vegetation Clearance: No vegetation clearance is proposed. However, the presence of Himalayan balsam adjacent to the bridge introduces a risk of inadvertent spread during works. The FI response confirms that best practice biosecurity measures will be implemented to prevent off-site spread. Demolition: The removal of the existing bridge will involve uncoupling and lifting by crane. The FI response clarifies that any cutting of bolts will be carried out by hand using suitable tools, not hot works, eliminating the risk of molten metal entering the Mill Stream. Surface Water Runoff: No excavation or infill is proposed, and the FI response confirms that the works will not generate contaminated runoff due to the absence of soil disturbance and the short duration of activities. Dust, Noise, Vibration: These impacts are expected to be temporary and minor. The FI response confirms the works will he completed in one day, significantly reducing potential disturbance to mobile species such as otters. Lighting Disturbance: No artificial lighting or night-time works are proposed. Impact on Groundwater / Dewatering: No dewatering or groundwater interference is anticipated. Storage of Excavated / Construction Materials: The FI response confirms that no site compound or storage area will be established, removing the risk of accidental pollution or habitat disturbance. Access to Site: Access will be via existing amenity grass areas. The FI response confirms crane use

	will be limited to the immediate working area, avoiding sensitive habitats. Pests: No waste or conditions likely to attract pests are expected.
Operation phase e.g. - Direct emission to air and water - Surface water runoff containing contaminant or sediment - Lighting disturbance - Noise/vibration - Changes to water/groundwater due to drainage or abstraction - Presence of people, vehicles and activities - Physical presence of structures (e.g collision risk) - Potential for accidents or incidents	Following completion of the pedestrian bridge replacement, the operational phase will involve passive use of the structure by pedestrians only. While the bridge replaces an existing structure and is not expected to introduce new pressures, the following potential impacts have been considered. Direct Emissions to Air and Water: There will be no emissions to air or water during the operational phase. The bridge is a passive structure and does not involve any mechanical or powered elements. Surface Water Runoff Containing Contaminants or Sediment: The bridge does not introduce any new impermeable surfaces or drainage infrastructure. The FI response confirms that the works will not disturb soil or introduce contaminants, and no ongoing monitoring is considered necessary beyond standard maintenance. Lighting Disturbance: No artificial lighting is proposed as part of the bridge design. This eliminates the risk of lighting-related disturbance to nocturnal species such as otters or bats. Noise / Vibration: Use of the bridge will be limited to pedestrian traffic, which will not generate significant noise or vibration. The structure is not expected to alter the existing acoustic environment. Changes to Water / Groundwater Due to Drainage or Abstraction: No changes to drainage, water abstraction, or groundwater interaction are proposed or anticipated.

	Presence of People, Vehicles and Activities: The bridge will restore pedestrian connectivity across the Mill Stream. While this may result in a slight increase in foot traffic compared to the current situation (where the bridge is closed), the FI response confirms that this will remain consistent with historic use and is not considered significant in terms of disturbance to local fauna. Physical Presence of Structures (e.g. Collision Risk): The replacement bridge will occupy the same footprint as the previous structure and does not pose a collision risk to wildlife. It does not obstruct movement corridors for species such as otters or birds. Potential for Accidents or Incidents: The operational phase presents a negligible risk of pollution or accidents. No hazardous materials are associated with the structure, and its passive nature limits the potential for environmental incidents. The operational phase of the proposed bridge is not expected to result in significant effects on the qualifying interests of the Lower River Shannon SAC or the River Shannon and River Fergus Estuaries SPA. The FI response confirms that biosecurity measures during construction will prevent the spread of Himalayan balsam, eliminating any indirect operational risk.
In-combination/Other	Following receipt of the further information and the ecological report, the potential for significant effects arising from the proposed bridge replacement works alone can now be confidently ruled out, as the outstanding gaps regarding otter presence and invasive species management have been addressed. The works are confirmed as minor in scale, of very short duration (one day), and subject to best-practice biosecurity measures. Based on the updated information, there are no known plans or projects in the immediate

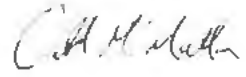
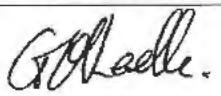
	vicinity with overlapping construction timelines or spatial impacts that would give rise to likely significant in-combination effects. Given the absence of otter holts, the negligible footprint of the works, and the confirmed invasive species protocols, the risk of cumulative or in-combination impacts is considered negligible.

(b) **Describe any likely changes to the European site:**	
Examples of the type of changes to give consideration to include: - Reduction or fragmentation of habitat area - Disturbance to QI species - Habitat or species fragmentation - Reduction or fragmentation in species density - Changes in key indicators of conservation status value (water or air quality etc) - Changes to areas of sensitivity or threats to QI - Interference with the key relationships that define the structure or ecological function of the site	Based on the further information provided, the proposed works are confirmed as minor in scale, of very short duration (one day), and subject to strict biosecurity measures. The ecological survey confirms that no otter holts are present within the zone of influence, and the construction methodology eliminates risks of contamination or habitat disturbance. As such, the potential for direct or indirect changes to the ecological integrity of the Lower River Shannon SAC or the River Shannon and River Fergus Estuaries SPA can now be ruled out. There will be no reduction or fragmentation of habitat area, no disturbance to qualifying interest species, and no changes to key indicators of conservation status such as water quality. The works will not interfere with the structure or ecological function of the site, nor will they introduce new threats to sensitive areas. The physical footprint of the replacement bridge remains unchanged, and the operational phase will not increase pressures beyond historic levels of pedestrian use. The proposed works will not result in any changes to habitat extent, species density, water quality, or ecological function of the European sites. With the implementation of best-practice measures for invasive species control during construction, the risk of indirect impacts is negligible.

(c) **(Are '*mitigation*' measures necessary to reach a conclusion that likely significant effects can be ruled out at screening?**
☐ **Yes** ☒ **No**

STEP 4: Screening Determination Statement
The assessment of significance of effects: Describe how the proposed development (alone or in-combination is/is not likely to have significant effects on European site (s) in view of its conservation objectives
The proposed bridge replacement is confirmed as modest in scale, of very short duration (one day), and subject to best-practice biosecurity measures. The further information submission addresses previous uncertainties by providing a site-specific otter survey, which confirms no holts within the zone of influence, and detailed construction methodology, which eliminates risks of water contamination or habitat disturbance. The absence of a site compound and the implementation of invasive species control measures further reduce potential impacts. In view of the conservation objectives of the Lower River Shannon SAC and the River Shannon and River Fergus Estuaries SPA, the works will not result in significant effects, either alone or in combination with other plans or projects. There will be no disturbance to qualifying interest species, no reduction or fragmentation of habitats, and no changes to water quality or ecological function. The proposal can now be screened out, as it is not likely to have significant effects on any European site, provided that the confirmed best-practice measures are implemented during construction.

	Tick as appropriate:	Recommendation:
(i) It is clear that there **is no likelihood** of significant effects on a European Site	☒	The proposal can be screened out: Appropriate Assessment not required.
(ii) It is **uncertain** whether the proposal will have a significant effect on a European Site	☐	☐ Request further information to complete screening ☐ Request NIS ☐ Refuse planning permission
	☐	☐ Request NIS

(iii) **Significant effects** are likely		☐ Refuse planning permission
Signature and Date of Recommending Officer:	Cathal McMullan  04/12/2025	
Signature and Date of the Decision Maker:	 10/12/2025	

Appendix 2: EIA Screening

Establishing if the proposal is a *'sub-threshold development'*:	
Planning Register Reference:	EC-194-25
Development Summary:	Replacement of the Millstream bridge
Was a Screening Determination carried out under Section 176A-C?	☐ Yes. no further action required X No. Proceed to **Part A**

A. Schedule 5 Part I - Does the development comprise a project listed in Schedule 5. **Part 1.** of the Planning and Development Regulations 2001 (as amended)? (Tick as appropriate)		
☐	Yes. specify class: [insert here] _	**EIA is mandatory** No Screening required
X	No	Proceed to **Part B**

B. Schedule 5 Part 2 - Does the development comprise a project listed in Schedule 5, **Part 2,** of the Planning and Development Regulations 2001 (as amended) **and** does it meet/exceed the thresholds? (Tick as appropriate)		
X	No. the development is not a project listed in Schedule 5, Part 2	**No Screening required**
☐	Yes the project is listed in Schedule 5. Part 2 **and** meets/exceeds the threshold, specify class (including threshold): _[specify class & threshold here]_	**EIA is mandatory** No Screening required
☐	Yes the project is of a type listed **but** is *sub-threshold:* [insert here] _	Proceed to **Part C**

c. If Yes, has Schedule 7A information/screening report been submitted?	
☐ Yes, Schedule 7A information/screening report has been submitted by the applicant	**Screening Determination required**
☐ No, Schedule 7A information/screening report has not been submitted by the applicant	**Preliminary Examination required**

Signature and Date of Recommending Officer:	Cathal McMullan

Internal Reports/Communication

Re: UL - Replacement Bridge Section 5

Doyle, Sean
To: McMullen, Cathal

You replied to this message on 04/12/2025 09:28

Reply | Reply All | Forward

Wed 03/12/2025 11:25

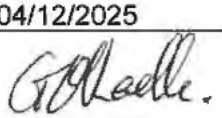
Hi Cathal,
Having gone through the responses and various docs cited in the main response letter, the following can be stated.

The letter suggests that experienced ecologists were used to conduct a survey of the area in Oct 2025 for otter.
This consisted of a search of the following "a distance c. 25m upstream of the existing bridge, and c.100m downstream".
This is more suitable than the survey conducted by a landscape architect cited in the initial screening report.
However, this does not effectively cover off the recognised standard distance for disturbance to otter holt of 150m.
However, given the size, nature and scale of the development and clear duration of the works, which has been more clearly outlined in the FI response, it can be concluded that significant impacts to Otter populations or potential holting otter can be sufficiently screened out at this stage.
The duration, method of works and the site compound issue are considered to be adequately addressed.

The response to the Himalayan Balsam issue is interesting in that the report author seems to be suggesting that the need for invasive species protection protocols on this proposal is excessive and is supplementary to best practice as opposed to something that is required. The logic underpinning this statement seems to be the presence of Himalyan Balsam downstream of the proposal already.
The further spread downstream in the Shannon is recognised as unlikely to be significant given the plant is already well established in this area.
However, the council does agree with the scientific deduction of the author when it is suggested, the plant spreads through seed dispersal.
Given the well established nature of Himalayan Balsam in the vicinity of the proposal, it would seem logical to assume that these seeds which are contained in the soil bank of the area, and so could be spread offsite by machinery involved.
Any spread of this plant as a third schedule would amount to an offence.
This could in theory, spread the seed to previously uncolonised areas and even to other designated sites dependant on where the machine is next commissioned.
As information as to the whereabouts of the machine's next engagement cannot be reasonably supplied a control statement for the spread of these plants should have been supplied as best practice in the first instance.

It can be concluded that the proposal can be sufficiently screened out at this stage.

Kind regards
Seán

	 04/12/2025
Signature and Date of the Decision Maker:	 10/12/2025

Comhairle Cathrach
& Contae Luimnigh
Limerick City
& County Council

Pleanáil, agus Cruthú Áite
Comhairle Cathrach agus Contae Luimnigh
Bothar Thuar an Daill
Tuar an Daill, Luimneach
V94 WV78

Planning and Place-Making
Limerick City and County Council
Dooradoyle Road
Dooradoyle, Limerick
V94 WV78

PLANNING & PLACE-MAKING

REG POST:

University of Limerick,
c/o Cronin Sutton Consulting,
19-22 Dame Street,
Dublin 2.

EC/194/25 10 December 2025

Re: Declaration under Section 5

Dear Sir/Madam,

I refer to the above application for Section 5 Declaration on Development and Exempted Development.

Please find herewith a copy of Council's decision on same.

Yours faithfully,

(for) Senior Planner,
Development Management

Tuar an Daill, Luimneach
Dooradoyle, Limerick

customerservices@limerick.ie
www.limerick.ie
@LimerickCouncil
061 - 556 000

LIMERICK CITY & COUNTY COUNCIL

APPROVED OFFICER'S ORDER

SECTION 5 – DECLARATION ON DEVELOPMENT AND EXEMPTED DEVELOPMENT

No. AOO/DC/2025/1387

File Ref No. EC/194/25

SUBJECT: Declaration under Section 5.
Planning and Development Act 2000 as amended
Planning and Development Regulations 2001 as amended

RE: **A replacement of a bridge at Northeast Edge of the Limerick Campus, Limerick**

ORDER: Whereas by Director General's Order No. DG/2024/141 dated 07th October 2025, Dr. Pat Daly, Director General, Limerick City & County Council did, pursuant to the powers conferred on him by Section 154 of the Local Government Act, 2001, (as amended by the Local Government Reform Act, 2014 and the Local Government (Mayor of Limerick) and Miscellaneous Provisions Act, 2024), delegate unto Grainne O'Keeffe, Senior Executive Planner the functions as defined in the Local Government Acts, 1925 to 2024.

Now therefore pursuant to the delegation of the functions aforesaid, I, Grainne O'Keeffe, Senior Executive Planner, having considered the report and recommendation of Cathal McMullan, Assistant Planner dated 04/12/2025, hereby order that a Declaration under Section 5 of the Planning and Development Act 2000 (as amended) be issued to University of Limerick, c/o Cronin Sutton, Consulting, 19-22 Dame Street, Dublin 2 to state that the works as described above is

Development and is Exempt Development.

Signed GOKeeffe

SENIOR EXECUTIVE PLANNER, PLANNING & PLACE-MAKING

Date 10/12/25

Certified to be a true copy of Approved Officer's Order, Planning & Development Order No. AOO/DC/2025/1387 dated 10/12/25, pursuant to Section 151(7) of the Local Government Act 2001

Signed: GOKeeffe

SENIOR EXECUTIVE PLANNER, PLANNING & PLACE-MAKING

LIMERICK CITY & COUNTY COUNCIL

APPROVED OFFICER'S ORDER

SECTION 5 – DECLARATION ON DEVELOPMENT AND EXEMPTED DEVELOPMENT

No. AOO/DC/2025/1387

File Ref No. EC/194/25

SUBJECT: Declaration under Section 5.
Planning and Development Act 2000 as amended
Planning and Development Regulations 2001 as amended

RE: **A replacement of a bridge at Northeast Edge of the Limerick Campus, Limerick**

ORDER: Whereas by Director General's Order No. DG/2024/141 dated 07th October 2025, Dr. Pat Daly, Director General, Limerick City & County Council did, pursuant to the powers conferred on him by Section 154 of the Local Government Act, 2001, (as amended by the Local Government Reform Act, 2014 and the Local Government (Mayor of Limerick) and Miscellaneous Provisions Act, 2024), delegate unto Grainne O'Keeffe, Senior Executive Planner the functions as defined in the Local Government Acts, 1925 to 2024.

Now therefore pursuant to the delegation of the functions aforesaid, I, Grainne O'Keeffe, Senior Executive Planner, having considered the report and recommendation of Cathal McMullan, Assistant Planner dated 04/12/2025, hereby order that a Declaration under Section 5 of the Planning and Development Act 2000 (as amended) be issued to University of Limerick, c/o Cronin Sutton, Consulting, 19-22 Dame Street, Dublin 2 to state that the works as described above is

Development and is Exempt Development.

Signed GOKeeffe

SENIOR EXECUTIVE PLANNER, PLANNING & PLACE-MAKING

Date 10/12/25