Limerick City and County Council

Planning Department

Section 5 Application

DECLARATION ON DEVELOPMENT AND EXEMPTED DEVELOPMENT

Applicant's Name: Eli Lilly Limerick

Applicant's Address: Raheen Business Park

Ballycummin, County Limerick

Telephone No. [redacted]

Name of Agent (if any): Jacobs Engineering Ireland Limited

Address: Floor 2, Termini Building, 3 Arkle Road,

Sandyford Business Park, Dublin 18

Telephone No. (01) 269 5666

Address for Correspondence:

Jacobs Engineering Ireland Limited

Floor 2, Termini Building, 3 Arkle Road,

Sandyford Business Park, Dublin 18

Location of Proposed development (Please include **EIRCODE**):

Limerick Racecourse, Greenmount Park,

Patrickswell, County Limerick, V94 K858

Description of Proposed development:

The temporary use of 500no. car parking spaces at Limerick Racecourse (previously permitting under Reg.Ref. 98/1077) in lieu of 500no. temporary construction related car parking spaces at the Eli Lilly site in Raheen Business Park, Ballycummin, County Limerick (previously permitted under Reg.Ref.24/01666)

Section of Exempted Development Regulations and/or section of the Act under which exemption is claimed:

No Material Change of Use

Is this a Protected Structure or within the curtilage of a Protected Structure.

~~YES~~ NO

Applicant's interest in site: Temporary Leaseholder

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

See schedule of Documents attached to this submission.

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

If Yes please provide floor areas of all existing structures:

Area in question (red line boundary) relates only to the 500no. car parking spaces required.

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:

Planning Department,
Limerick City & County Council,
Dooradoyle,
Limerick,
V94 XF67

Enquiries:
Telephone: 061-556556
E-Mail: planning@limerick.ie

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Outlook

[EXTERNAL] Receipt

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Eli Lilly
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Park
Limerick

Code	Ref	Amount	VAT
PL041	EXEMPTION CERTIFICATES	80.00 EUR	0.00 EUR

Paid with: Credit / Debit Card
Subtotal: 80.00 EUR
Tax (VAT): 0.00 EUR
Total: 80.00 EUR
Tendered: 80.00 EUR

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SCHEDULE OF DOCUMENTS AND DRAWINGS

SECTION 5 APPLICATION

Proposed Temporary Construction Car Park at Limerick Race Course

January 2025

Doc. No.	Description	Size	Copies	✓
(this document)	Schedule of Documents (this Document)	A4	1no.	✓
(this document)	Drawings & Drawing List (this Document)	A4	1no.	✓
01	Cover Letter (by Email)	-	1no.	✓
02	Declaration of Exempt Development Form	A4	1no.	✓
03	Appropriate Assessment Screening Report	A4	1no.	✓
04	Environmental Impact Assessment Screening Report	A4	1no.	✓
05	Traffic Impact Assessment Technical Note	A4	1no.	✓
06	Drawings as outlined below	A0	1no.	✓

Drawing No.	Drawing Title	Size	Copies	Scale
25-LI-PE 00001	Contextual Site Location [Aerial Photograph]	A0	1no.	1:10,000
25-LI-PE 00002	Site Layout	A0	1no.	1:2,500
25-LI-PE 00003	Site Layout	A0	1no.	1:500
25-LI-PE 00004	Previously Approved Reference Drawing from Reg. Ref. 98/1077	A0	1no.	1:2,500

Report for the purposes of Appropriate Assessment Screening

Construction Stage Car Park at Limerick Racecourse for Eli Lilly Limerick

Prepared by: Moore Group – Environmental Services

14 January 2026

On behalf of Eli Lilly

Project Proponent	Eli Lilly Limerick
Project	Construction Stage Car Park at Limerick Racecourse for Eli Lilly Limerick
Title	Report for the purposes of Appropriate Assessment Screening Construction Stage Car Park at Limerick Racecourse for Eli Lilly Limerick

Project Number	25276	**Document Ref**	25276 Limerick Racecourse Car Pk AAS1 Rev0	
Revision	**Description**	**Author**		**Date**
Rev0	Issued to Client	G. O'Donohoe		26 November 2025
Rev1	Final	G. O'Donohoe		14 January 2026
Moore Archaeological and Environmental Services Limited				

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Abbreviations

AA	Appropriate Assessment
ACP	An Coimisiún Pleanála
CEMP	Construction Environmental Management Plan
EEC	European Economic Community
EPA	Environmental Protection Agency
EU	European Union
FWPM	Freshwater Pearl Mussel
GIS	Geographical Information System
LAP	Local Area Plan
NHA	Natural Heritage Area
NIS	Natura Impact Statement
NPWS	National Parks and Wildlife Service
OSI	Ordnance Survey Ireland
pNHA	proposed Natural Heritage Area
SAC	Special Area of Conservation
SPA	Special Protection Area
SuDS	Sustainable Drainage System
UÉ	Uisce Éireann
WFD	Water Framework Directive

1. Introduction

1.1. General Introduction

This report for the purposes of Appropriate Assessment (AA) Screening has been prepared to support a Planning Application for the Project (described in Section 3 below). This report contains information required for the competent authority to make a determination on screening for Appropriate Assessment (AA) in respect of the construction and operation of a temporary construction carpark for the Eli Lilly development at Limerick Racecourse, Greenmount (hereafter referred to as the Project) to determine whether it is likely individually or in combination with other plans or projects to have a significant effect on any European sites, in light of best scientific knowledge.

Having regard to the provisions of the Planning and Development Act 2000, as amended (the "Planning Acts") (section 177U), the purpose of a screening exercise under section 177U of the PDA 2000 is to assess, in view of best scientific knowledge, if the Project, individually or in combination with other plans or projects is likely to have a significant effect on a European site.

If it cannot be *excluded* on the basis of objective information that the Project, individually or in combination with other plans or projects, will have a significant effect on a European site then it is necessary to carry out a Stage 2 appropriate assessment under section 177V of the Planning Acts.

When screening the project, there are two possible outcomes:

- the project poses no potential for the possibility of a significant effect and as such requires no Stage 2 assessment; or
- the project has potential to have a significant effect (or this is uncertain and therefore cannot be excluded) and therefore a Stage 2 Appropriate Assessment of the project is necessary.

This report has been prepared by Moore Group - Environmental Services to enable the competent authority to make a determination on AA screening in relation to the Project. The report was compiled by Ger O'Donohoe B.Sc. Applied Aquatic Sciences (ATU Galway, 1993) & M.Sc. Environmental Sciences (TCD, 1999) who has over 30 years' experience in environmental impact assessment and has completed numerous Appropriate Assessment Screening Reports and Natura Impact Statements on terrestrial and aquatic habitats for various development types.

1.2. Legislative Background - The Habitats and Birds Directives

Article 6(3) and 6(4) of the Habitats Directive are transposed into Irish Law inter alia by the Part XAB of the Planning Acts (in particular section 177U and 177V) which governs the requirement to carry out appropriate assessment screening and appropriate assessment, where required, per Section 1.1 above.

The Habitats Directive (Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora) is the main legislative instrument for the protection and conservation of biodiversity in the European Union (EU). Under the Habitats Directive, Member States are obliged to designate Special Areas of Conservation (SACs) which contain habitats or species considered important for protection and conservation in a EU context.

The Birds Directive (Council Directive 2009/147/EC on the conservation of wild birds), transposed into Irish law by the Bird and Natural Habitats Regulations 2011 as amended, and the Wildlife Act 1976, as amended, is concerned with the long-term protection and management of all wild bird species and their habitats in the EU. Among other things, the Birds Directive requires that Special Protection Areas (SPAs) be established to protect migratory species and species which are rare, vulnerable, in danger of extinction, or otherwise require special attention.

SACs designated under the Habitats Directive and SPAs, designated under the Birds Directive, form a pan-European network of protected sites known as Natura 2000. The Habitats Directive sets out a unified system for the protection and management of SACs and SPAs. These sites are also referred to as European sites.

Articles 6(3) and 6(4) of the Habitats Directive set out the requirement for an assessment of proposed plans and projects likely to have a significant effect on Natura 2000 sites.

Article 6(3) establishes the requirement to screen all plans and projects and to carry out an appropriate assessment if required (Appropriate Assessment (AA)).

> ***Article 6(3):*** *"Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subjected to an appropriate assessment of its implications for the site in view of the site's conservation objectives. In 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."*

Article 6(4) establishes requirements in cases of imperative reasons of overriding public interest.

2. Methodology

The Commission's methodological guidance (EC, 2002, 2018, 2021 see Section 2.1 below) promotes a four-stage process to complete the AA and outlines the issues and tests at each stage. An important aspect of the process is that the outcome at each successive stage determines whether a further stage in the process is required.

Stages 1 and 2 deal with the main requirements for assessment under Article 6(3). Stage 3 may be part of Article 6(3) or may be a necessary precursor to Stage 4. Stage 4 is the main derogation step of Article 6(4).

Stage 1 Screening: This stage examines the likely effects of a project either alone or in combination with other plans and projects upon a Natura 2000 site and considers whether it can be objectively concluded that these effects will not be significant. In order to screen out a project, it must be excluded, on the basis of objective information, that the Project, individually or in combination with other plans or projects, will have a significant effect on a European site.

Stage 2 Appropriate Assessment: This stage considers whether the plan or project, alone or in combination with other projects or plans, will have adverse effects on the integrity of a Natura 2000 site, and includes any mitigation measures necessary to avoid, reduce or offset negative effects. The proponent of the plan or project will be required to submit a Natura Impact Statement, i.e. the report of a targeted professional scientific examination of the plan or project and the relevant Natura 2000 sites, to identify and characterise any possible implications for the site in view of the site's conservation objectives, taking account of in combination effects.

Stage 3 Assessment of Alternative Solutions: This stage examines alternative ways of implementing the project that, where possible, avoid any adverse impacts on the integrity of the Natura 2000 site.

Stage 4 Assessment where no alternative solutions exist and where adverse impacts remain: Where imperative reasons of overriding public interest (IROPI) exist, an assessment to consider whether compensatory measures will or will not effectively offset the damage to the sites will be necessary.

To ensure that the Project complies fully with the requirements of Article 6 of the Habitats Directive and all relevant Irish transposing legislation, Moore Group compiled this report to enable the competent authority to make a determination on AA screening in relation to the Project to determine whether it can be excluded, on the basis of objective information, that the Project, individually or in combination with other plans or projects, will have a significant effect on a European site(s).

2.1. Guidance

This report has been compiled in accordance with guidance contained in the following documents:

- Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities. (Department of Environment, Heritage and Local Government, 2010 rev.).
- Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities. Circular NPWS 1/10 & PSSP 2/10.
- Managing Natura 2000 Sites: The Provisions of Article 6 of the Habitat's Directive 92/43/EEC (EC, 2018).
- Guidance document on the strict protection of animal species of Community interest under the Habitats Directive (EC, 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 (EC, 2021).
- Office of the Planning Regulator (OPR) Practice Note PN01 Appropriate Assessment Screening for Development Management (OPR, 2021).
- Natura Impact Statement Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (NPWS, 2024).

2.2. Data Sources

Sources of information that were used to collect data on the Natura 2000 network of sites, and the environment within which they are located, are listed below:

- The following mapping and Geographical Information Systems (GIS) data sources, as required:
    - National Parks & Wildlife (NPWS) protected site boundary data;
    - Ordnance Survey of Ireland (OSI) mapping and aerial photography;
    - OSI/Environmental Protection Agency (EPA) rivers and streams, and catchments;
    - Digital Elevation Model over Europe (EU-DEM);
    - Google Earth and Bing aerial photography 1995-2025;
- Online data available on Natura 2000 sites as held by the National Parks and Wildlife Service (NPWS) from www.npws.ie including:
    - Natura 2000 - Standard Data Form;
    - Conservation Objectives;
    - Site Synopses;
- National Biodiversity Data Centre records;
    - Online database of rare, threatened and protected species;
    - Publicly accessible biodiversity datasets.
- Status of EU Protected Habitats in Ireland. (National Parks & Wildlife Service, 2019); and
- Relevant Development Plans;
    - Limerick City and County Development Plan 2022-2028

3. Description of the Project

The Project consists of the relocation of 500 construction car parking spaces from the Eli Lilly construction compound at Raheen to Limerick Racecourse, Greenmount, County Limerick.

The reasons for the unforeseen (during the planning application) requirement to use remote temporary construction parking are as follows;

- There is an area of site being used by the ESB for their infrastructure (a proposed substation that will serve the local area).
- The requirement to retain and protect a proportion of Meadow Barley and other 'High Nature Value Areas' by the NPWS.
- Developments by other applicants approved int he intervening time have added to cumulative traffic.
- Potential to lease the race course grounds presented itself following the application and was viewed as an opportunity to improve the commute for a percentage of construction staff travelling to site from specific directions.

The Project site comprises the existing parking facility at Limerick Racecourse which has been in operation since the mid 1990's. The particular area of the Racecourse parking comprised grasses areas accessed from hardcore access strips.

The proposed works will involve placing interlocking HDPE plastic mats over the existing ground surface and provision of temporary lighting, signage and bus shelters. These works are minor in nature, limited in scale, and of short duration (c. 3 days).

The carpark will be operational from February 2026 to August 2027 and car park lights will be switched off at 6pm.

Figure 1 shows the Project location and Figure 2 shows a detailed view of the Project boundary on recent aerial photography. Figure 3 shows the layout of the Project.

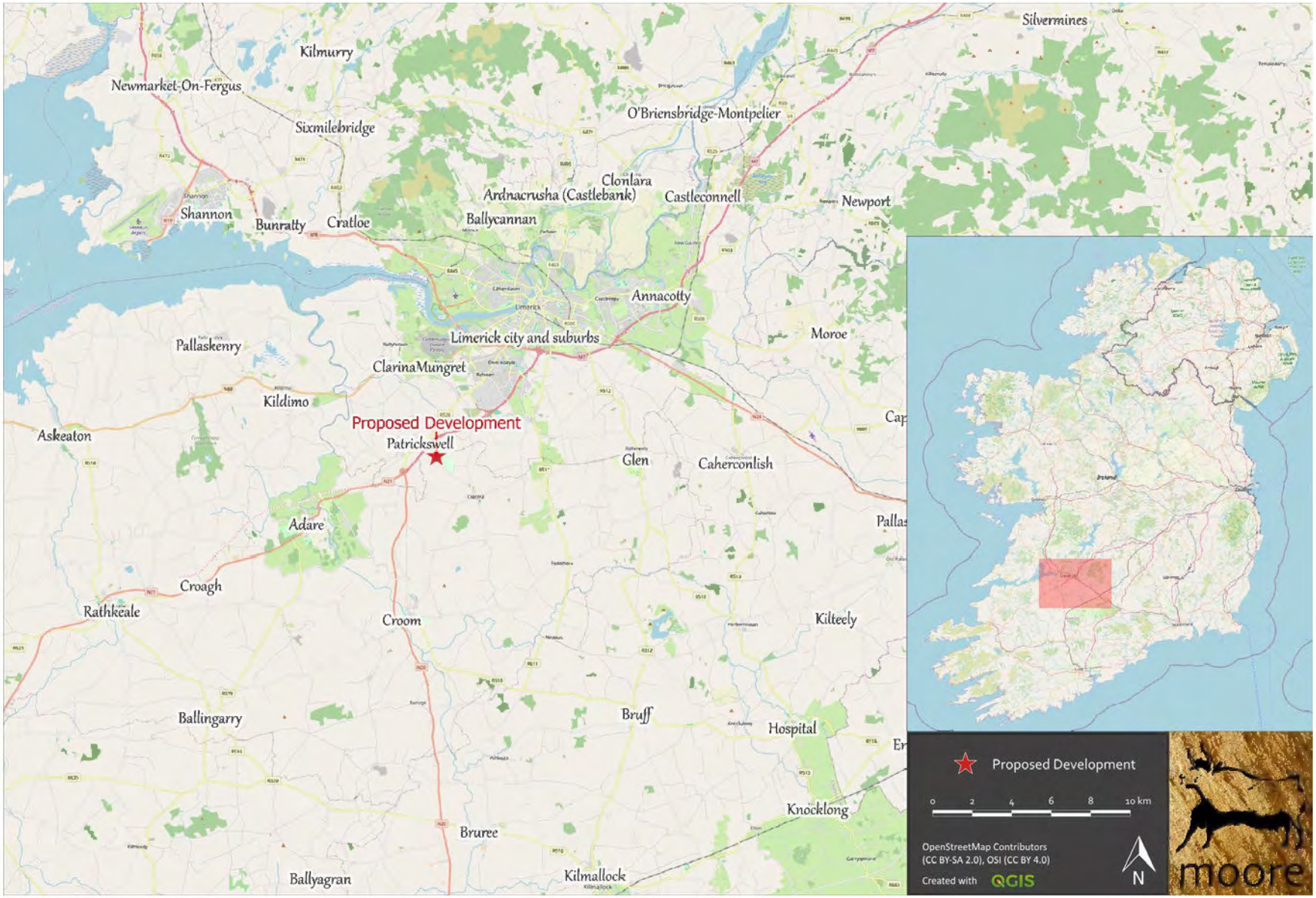

Figure 1. Showing the Project location at Patrickswell, Co. Limerick.

Figure 2. Showing the overall Project boundary with proposed car park area highlighted on recent aerial photography.

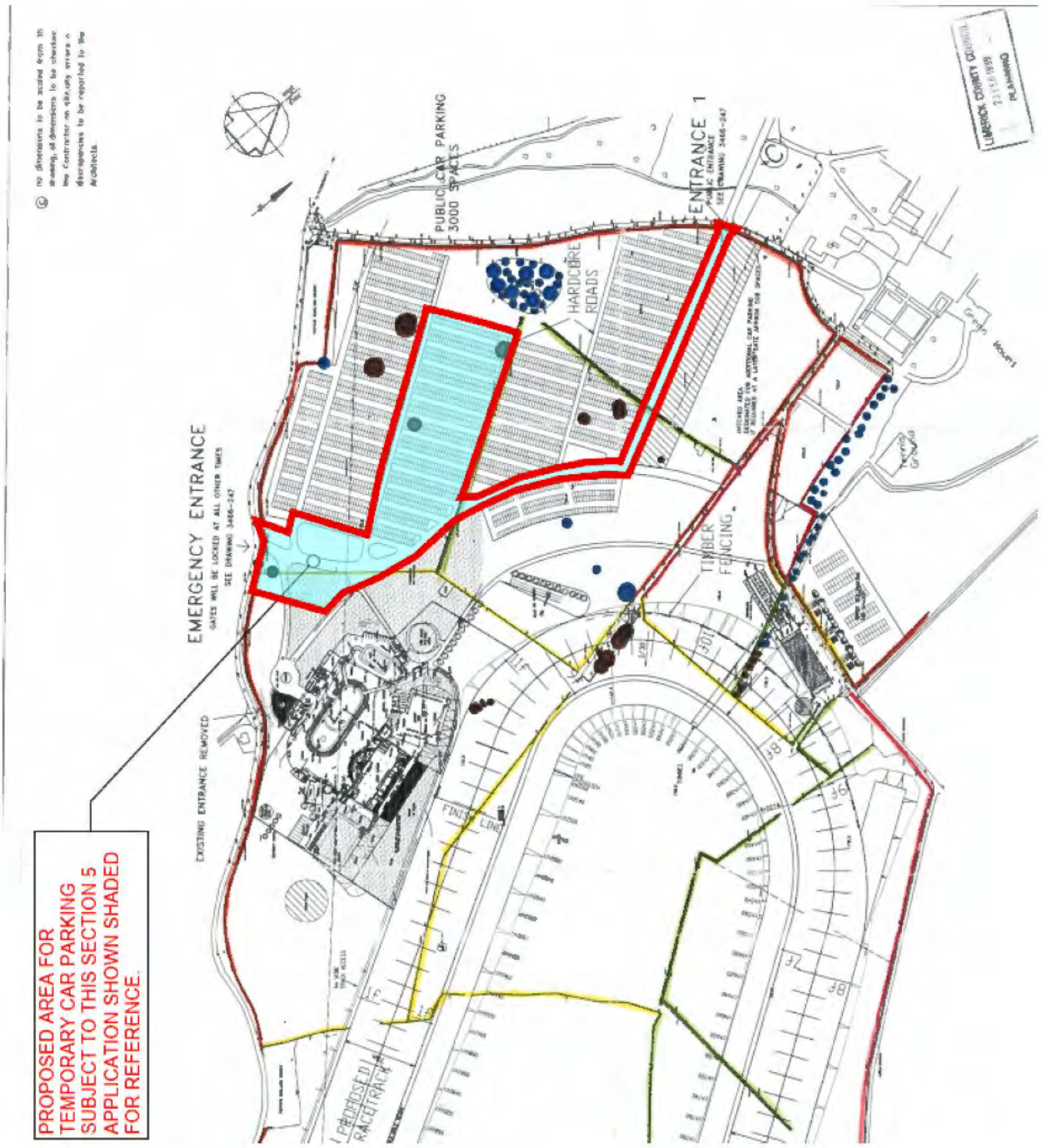

Figure 3. Plan of the Project

4. Identification of Natura 2000 Sites

4.1. Description of Natura Sites Potentially Significantly Affected

A Zone of Influence (ZoI) of a Project is the geographical area over which it could affect the receiving environment in a way that could have significant effects on the Qualifying Interests of a European site. In accordance with the OPR Practice Note (2021), PN01, the ZoI should be established on a case-by-case basis using the Source- Pathway-Receptor framework.

The European Commission's "*Assessment of plans and projects in relation to Natura 2000 sites guidance on Article 6(3) and (4) of the Methodological Habitats Directive 92/43/EEC*" published 28 September 2021 states at section 3.1.3, that:

"Identifying the Natura 2000 sites that may be affected should be done by taking into consideration all aspects of the plan or project that could have potential effects on any Natura 2000 sites located within the zone of influence of the plan or project. This should take into account all of the designating features (species, habitat types) that are significantly present on the sites and their conservation objectives. In particular, it should identify:

- *any Natura 2000 sites geographically overlapping with any of the actions or aspects of the plan or project in any of its phases, or adjacent to them;*
- *any Natura 2000 sites within the likely zone of influence of the plan or project Natura 2000 sites located in the surroundings of the plan or project (or at some distance) that could still be indirectly affected by aspects of the project, including as regards the use of natural resources (e.g. water) and various types of waste, discharge or emissions of substances or energy;*
- *Natura 2000 sites in the surroundings of the plan or project (or at some distance) which host fauna that can move to the project area and then suffer mortality or other impacts (e.g. loss of feeding areas, reduction of home range);*
- *Natura 2000 sites whose connectivity or ecological continuity can be affected by the plan or project".*

The range of Natura 2000 sites to be assessed, i.e. the zone in which impacts from the plan or project may arise, will depend on the nature of the plan or project and the distance at which effects may occur. For Natura 2000 sites located downstream along rivers or wetlands fed by aquifers, it may be that a plan or project can affect water flows, fish migration and so forth, even at a great distance. Emissions of pollutants may also have effects over a long distance. Some projects or plans that do not directly affect Natura 2000 sites may still have a significant impact on them if they cause a barrier effect or prevent ecological linkages. This may happen, for example, when plans affect features of the landscape that connect Natura 2000 sites or that may obstruct the

movements of species or disrupt the continuity of a fluvial or woodland ecosystem. To determine the possible effects of the plan or project on Natura 2000 sites, it is necessary to identify not only the relevant sites but also the habitats and species that are significantly present within them, as well as the site objectives.

The Zone of Influence may be determined by considering the Project's potential connectivity with European sites, in terms of:

- Nature, scale, timing and duration of all aspects of the proposed works and possible impacts, including the nature and size of excavations, storage of materials, flat/sloping sites;
- Distance and nature of potential pathways (dilution and dispersion; intervening 'buffer' lands, roads etc.); and
- Location of ecological features and their sensitivity to the possible impacts.

The potential for source pathway receptor connectivity is firstly identified through GIS interrogation and detailed information is then provided on sites with connectivity. European sites that are located within a potential Zone of Influence of the Project are listed in Table 1 and presented in Figures 4 and 5, below. Spatial boundary data on the Natura 2000 network was extracted from the NPWS website (www.npws.ie) on 26 November 2025. This data was interrogated using GIS analysis to provide mapping, distances, locations and pathways to all sites of conservation concern including pNHAs, NHA and European sites.

Table 1 European Sites located within the potential Zone of Influence[1] of the Project.

Site Code	Site name	Distance (km)[2]
000439	Tory Hill SAC	5.13
002165	Lower River Shannon SAC	4.63
004077	River Shannon and River Fergus Estuaries SPA	5.24

The nearest European sites to the Project are the Lower River Shannon SAC (Site Code 002165), 4.63km directly to the northwest with the River Shannon and River Fergus Estuaries SPA (Site Code 004077), 5.24km to the northwest.

Tory Hill SAC (Site Code 000439) is 5.13km to the south and the Askeaton Fen Complex SAC (Site Code 002279)is 9.85km to the west. These last two sites can be screened out at this stage due to a lack of any meaningful connectivity to the Project.

The Project is located within existing carparking area at Limerick Racecourse. A review of aerial photography, Ordnance Survey Ireland (OSI) mapping and OSI Geographical Information System (GIS) data for rivers and

[1] All European sites potentially connected irrespective of the nature or scale of the Project.
[2] Distances indicated are the closest geographical distance between the Project and the European site boundary, as made available by the NPWS.

streams indicates that there are no notable surface water features onsite and no direct hydrological pathways to offsite surface water bodies.

The nearest waterbody to the proposed car parking area is the Patrickswell Stream, which is located c. 120 m to the west of the parking area. The Patrickswell Stream joins the Barnakyle River c.1.5km downstream. The Barnakyle River then joins the River Maigue c. 7km further downstream where it is designated as part of the Lower River Shannon SAC and the River Shannon and River Fergus Estuaries SPA.

There is no direct pathway from the car parking area to the Patrickswell stream, with any surface water overland flow from the car parking area likely to follow the slope of the ground which slopes down towards the northeast away from the Patrickswell stream. On that basis and given the distance to the stream, it is considered unlikely that overland flow from the works in the car park area would enter the stream. It is more likely that, in the absence of storm water management measures, any surface water runoff within the construction site would infiltrate into the ground as per the current situation.

The Qualifying Interests (QIs) and Special Conservation Interests (SCIs) of the European sites in the Zone of influence of the Project are provided in Table 2 below.

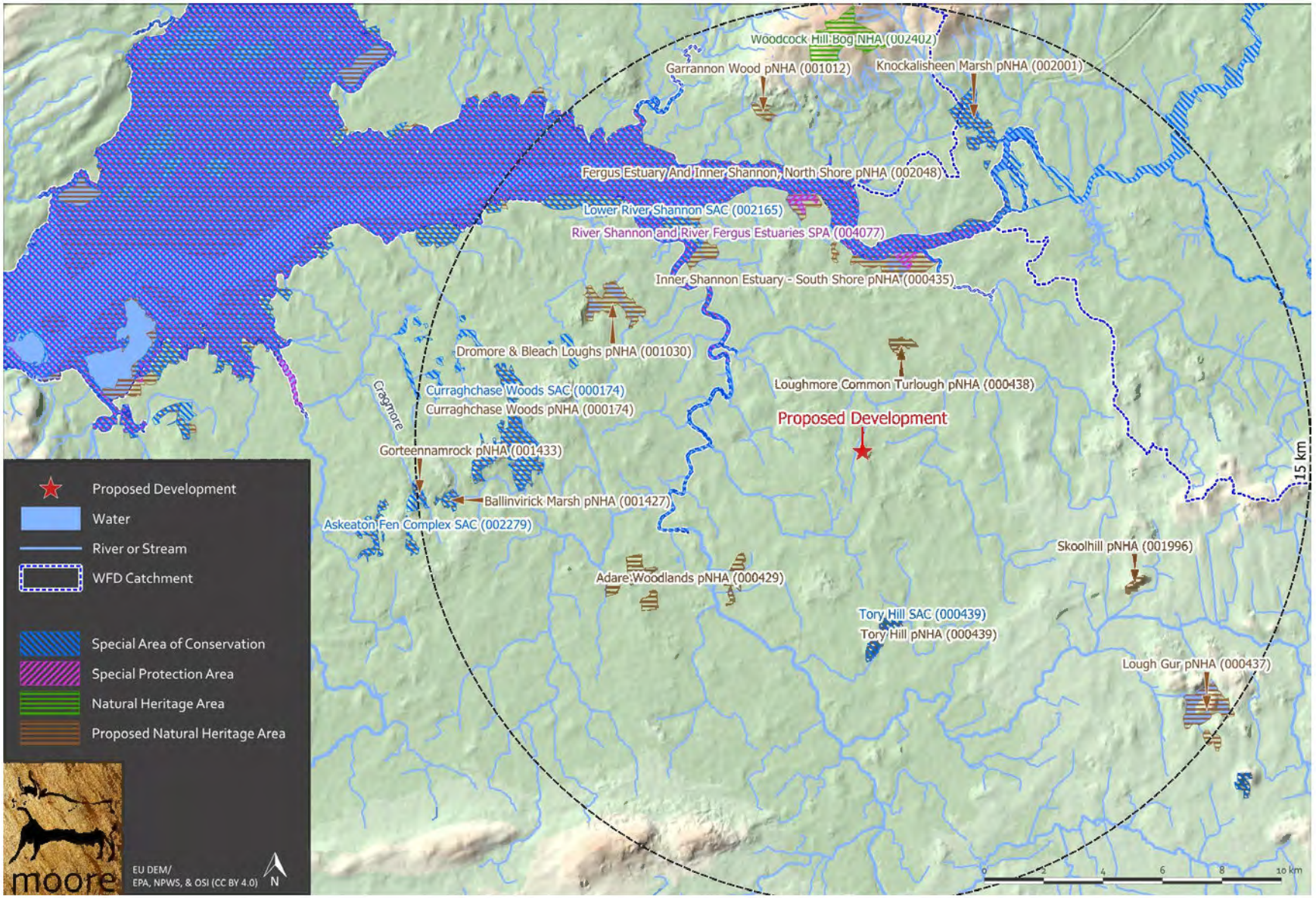

Figure 4. Showing European sites and NHAs/pNHAs within the wider Potential Zone of Influence of the Project.

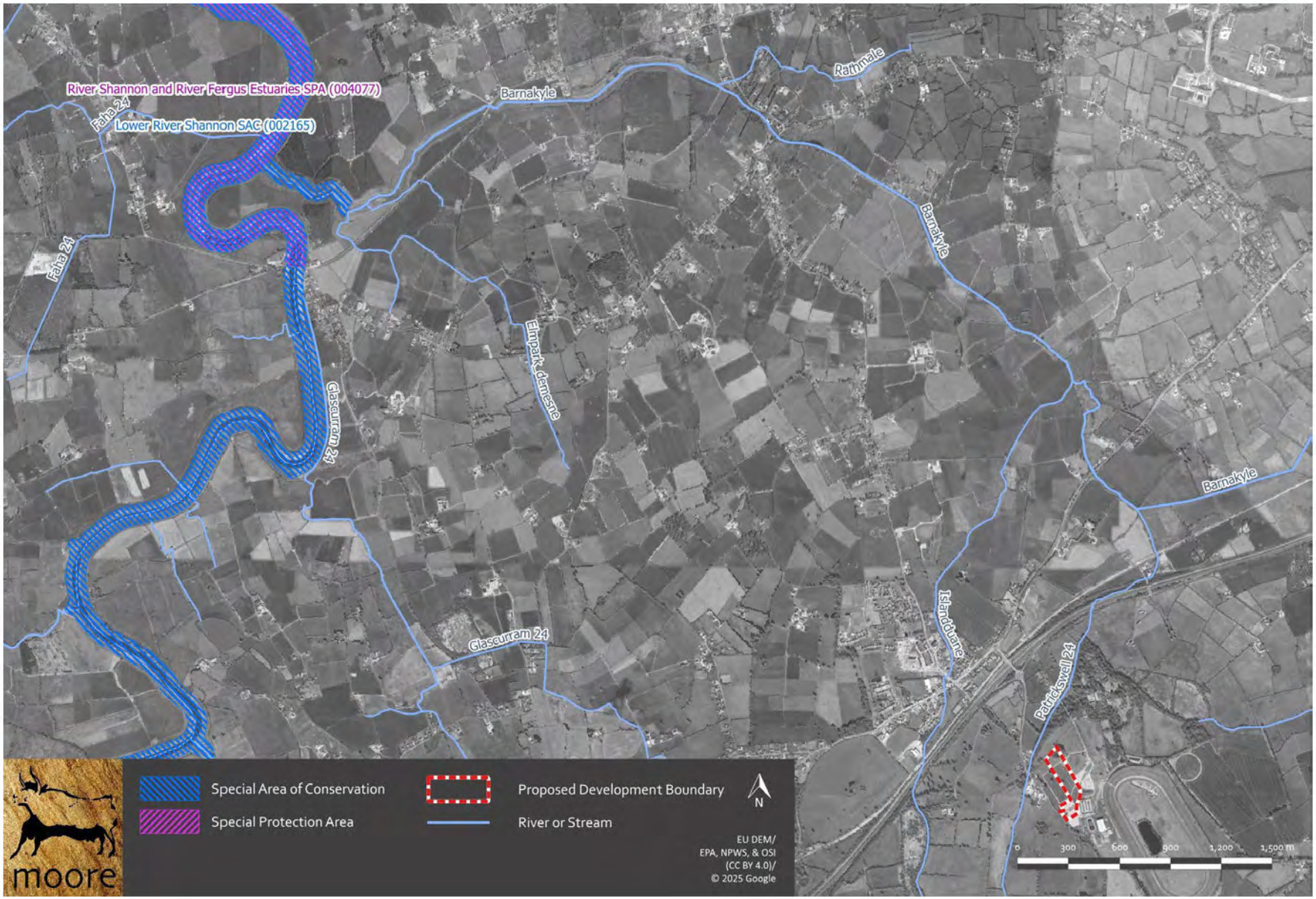

Figure 5. Detailed view of European sites in the nearer Potential Zone of Influence of the Project.

*Table 2 Identification of relevant European sites using Source-Pathway-Receptor model and compilation of information on QIs and conservation objectives. *Priority Habitats*

European Site name, Site code and Conservation Objectives	Location Relative to the Project Site	Connectivity – Source-Pathway-Receptor	Considered further in Screening – Y/N
Lower River Shannon SAC (002165) The overall aim of the Habitats Directive is to maintain or restore the favourable conservation status of habitats and species of community interest: 1029 Freshwater Pearl Mussel *Margaritifera margaritifera* 1095 Sea Lamprey *Petromyzon 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 truncatus* 1355 Otter *Lutra lutra* 1410 Mediterranean salt meadows (*Juncetalia maritimi*) 3260 Water courses of plain to montane levels with the *Ranunculion fluitantis* and *Callitricho-Batrachion* vegetation 6410 *Molinia* meadows on calcareous, peaty or clayey-silt-laden soils (*Molinion caeruleae*)	7km downstream of the Project	No There are no direct pathways or connectivity to the habitats and/or species of this site.	No

European Site name, Site code and Conservation Objectives	Location Relative to the Project Site	Connectivity – Source-Pathway-Receptor	Considered further in Screening – Y/N
91E0 *Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (*Alno-Padion, Alnion incanae, Salicion albae*) NPWS (2012) Conservation Objectives: Lower River Shannon SAC 002165. Version 1.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.			
River Shannon and River Fergus Estuaries SPA (004077) The overall aim of the Birds Directive is to maintain or restore the favourable conservation status of habitats and species of community interest: A017 Cormorant *Phalacrocorax carbo* breeding + wintering A038 Whooper Swan *Cygnus cygnus* wintering A046 Light-bellied Brent Goose *Branta bernicla hrota* wintering A048 Shelduck *Tadorna tadorna* wintering A050 Wigeon *Anas penelope* wintering A052 Teal *Anas crecca* wintering A054 Pintail *Anas acuta* wintering A056 Shoveler *Anas clypeata* wintering A062 Scaup *Aythya marila* wintering A137 Ringed Plover *Charadrius hiaticula* wintering A140 Golden Plover *Pluvialis apricaria* wintering A141 Grey Plover *Pluvialis squatarola* wintering A142 Lapwing *Vanellus vanellus* wintering A143 Knot *Calidris canutus* wintering A149 Dunlin *Calidris alpina* wintering A156 Black-tailed Godwit *Limosa limosa* wintering A157 Bar-tailed Godwit *Limosa lapponica* wintering A160 Curlew *Numenius arquata* wintering A162 Redshank *Tringa totanus* wintering A164 Greenshank *Tringa nebularia* wintering	7.5km downstream of the Project	No There are no direct pathways or connectivity to the habitats and/or species of this site. No Due to distance and the lack of any relevant ex-situ factors of significance to bird species or wetland habitat.	No

European Site name, Site code and Conservation Objectives	Location Relative to the Project Site	Connectivity – Source-Pathway-Receptor	Considered further in Screening – Y/N
A179 Black-headed Gull *Chroicocephalus ridibundus* wintering A999 Wetlands NPWS (2012) Conservation Objectives: River Shannon and River Fergus Estuaries SPA 004077. Version 1.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.			

4.2. Ecological Network Supporting Natura 2000 Sites

A concurrent GIS analysis of the proposed Natural Heritage Areas (pNHA) and designated Natural Heritage Areas (NHA) in terms of their role in supporting the species using Natura 2000 sites was undertaken along with GIS investigation of European sites. These supporting roles mainly relate to mobile fauna such as mammals and birds which may use pNHAs and NHAs as ecological corridors or "stepping stones" between Natura 2000 sites.

Article 10 of the Habitats Directive and the Habitats Regulations 2011 place a high degree of importance on such non-Natura 2000 areas as features that connect the Natura 2000 network. Features such as ponds, woodlands and important hedgerows were taken into account in the decision process and during the preparation of this AA Screening report.

The NHAs and pNHAs identified in Figure 4 are located outside the Zone of Influence, and there are no areas of supporting habitat that will be impacted by the Project.

5. Identification of Potential Impacts & Assessment of Significance

The Project is not directly connected with or necessary to the management of the sites considered in the assessment and therefore potential impacts must be identified and considered.

5.1. Assessment of Likely Significant Effects

The Project is located within existing carparking area at Limerick Racecourse. A review of aerial photography, Ordnance Survey Ireland (OSI) mapping and OSI Geographical Information System (GIS) data for rivers and streams indicates that there are no notable surface water features onsite and no direct hydrological pathways to offsite surface water bodies.

There is no direct connectivity to any European sites within or outside the potential Zone of Influence.

The consideration of all potential direct and indirect impacts that may result in significant effects on the conservation objectives of a European site, taking into account the size and scale of the Project are presented in Table 3.

Table 3 Assessment of Likely Significant Effects.

Identification of all potential direct and indirect impacts that may result in significant effects on the conservation objectives of a European site, taking into account the size and scale of the project.	
Impacts:	**Significance of Impacts:**
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	None The Project site is located within the boundary of the existing car park, an area of hard surfaces and amenity grassland. There are no direct pathways to European sites. Surface water runoff percolates to ground and there will be no emissions to the Patrickswell Stream, to the Barnakyle River or the River Maigue c. 8.5km downstream. The Lower River Shannon SAC and the River Shannon and River Fergus Estuaries SPA are considered to be outside the zone of influence of the Project.
Operational 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	Surface water runoff percolates to ground and there will be no emissions to the Patrickswell Stream, to the Barnakyle River or the River Maigue c. 8.5km downstream. The Lower River Shannon SAC and the River Shannon and River Fergus Estuaries SPA are considered to be outside the zone of influence of the Project. There is no real likelihood of any significant effects on European Sites in the wider catchment area. The facility is located at a distance of removal such that there will be no disturbance to qualifying interest species in any European sites.

Physical presence of structures (e.g. collision risks)	
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 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 Climate change	None. The Project site is not located adjacent or within a European site, therefore there is no risk of habitat loss or fragmentation or any effects on QI habitats or species directly or ex-situ.

5.2. Assessment of Potential In-Combination Effects

Cumulative effects are described by the EPA as *the addition of many minor or insignificant effects, including effects of other projects, to create larger, more significant effects*. In combination effects are considered in the appropriate assessment process as an assessment of the potential adverse effects of a plan or project in combination with other plans or projects. The underlying intention of the in-combination provision is to take account of cumulative effects.

As part of the Screening for an Appropriate Assessment, in addition to the Project, other relevant plans and projects in the area must also be considered at this stage. This step aims to identify at this early stage any possible significant in-combination effects of the Project with other such plans and projects on European sites.

A review of the National Planning Application Database was undertaken. The database was then queried for developments granted planning permission within 1000m of the Project within the last three years, these are presented in Table 4 below.

Table 4.Planning applications granted permission in the vicinity of the Project.

Planning Ref.	Description of development	Comments
21920	construction of an apartment building consisting of 3-storeys of residential accommodation above lower ground floor/basement consisting of the following accommodation mix; 8 x No. 2-bedroom apartments and 5 x No. 1-bedroom apartments, total 13 x No. apartments. The proposed works to include internal circulation and service areas on each floor, car parking, bicycle storage and ancillary storage areas at lower ground floor/basement, together with connection to existing public sewer network including all necessary enabling works, creation of new access points, creation of private and communal open space/amenity areas, works to site boundaries, ESB sub-station, public lighting, bin storage, surface car parking and bicycle stands and all ancillary site works including the demolition of an existing outbuilding	No potential for in-combination effects given the Project will have no effect on any European site.
221257	the demolition of an existing single storey dwelling house and the construction of a new replacement single storey dwelling with carport, out buildings, site landscaping, installation of a new wastewater treatment system and ancillary works to the public road boundary to reconfigure the existing vehicle entrance	No potential for in-combination effects given the Project will have no effect on any European site.
22225	the construction of a new vehicular entrance off main street & provision of visitor and staff car parking facilities, construction of an extension to existing office/ warehouse building together with all associated site works	No potential for in-combination effects given the Project will have no effect on any European site.
23125	the construction of a single storey extension to the existing dwelling house, the conversion of the existing attic to a habitable space including new rooflights in the existing roof, and the replacement of the front boundary fence including the relocation of the vehicular entrance and all associated site works	No potential for in-combination effects given the Project will have no effect on any European site.
2360158	existing limestone cladding to front elevation as built, 3x rooflight windows to existing roof as built and site boundary as built	No potential for in-combination effects given the Project will have no effect on any European site.
2360746	the alteration to previously approved Planning ref no's 18/200 ,18/1193 & 19/444. The alteration consists of the reduction in roads levels and dwelling floor levels for all three phases, and all associated site development works	No potential for in-combination effects given the Project will have no effect on any European site.
2360936	the change of use of the existing resource centre/office building known as 'Resource House', Main Street, Patrickswell, Co.Limerick to residential dwelling use. This proposed change of use relates to the entirety of the existing building, associated services and the building's site and boundaries	No potential for in-combination effects given the Project will have no effect on any European site.
2460610	the modification of a scheme permitted under Planning Ref. No. 21/873. The modification results in a net increase of 4 units on the wider site and consists of: the inclusion of houses 6-9 which are 2 blocks of semi d's to the north western boundary of the site to reflect site relevant revisions to the latest Local Area Plan, minor landscaping revisions, site ancillaries, all associated development and site works. The planning application is accompanied by an NIS (Natura Impact Statement)	No potential for in-combination effects given the Project will have no effect on any European site.
2460650	the construction of a new dwelling house, 2 No. private sheds, site entrance and access road along with all associated site works and services	No potential for in-combination effects given the Project will have no effect on any European site.
2560022	construction of 6 No. two storey terraced dwellings inclusive of the following; removal of existing front boundary wall and replacement with new low level wall with metal railings and individual	No potential for in-combination effects given the Project will have no effect on any European site.

Planning Ref.	Description of development	Comments
	pedestrian access gates, vehicular and pedestrian access to the rear, 'off street' parking to the rear, boundary treatment, landscaping and lighting and all ancillary site works inclusive of connections to adjacent services and utilities	
2560133	alteration to previously approved Planning ref no. 18/1193. The alterations consist of a change of house type from 2 bed to 3 bed for House No's 5-8 and the reposition of houses 47 and 48 to facilitate a revised site boundary adjacent house no. 48 and all associated site works	No potential for in-combination effects given the Project will have no effect on any European site.
2560156	a residential development comprising 63 no. residential units, (4 no. detached houses, 50 no. semi-detached houses, 9 no. terrace houses), a Creche, new entrance onto the existing R526 road and all ancillary site development works. Ancillary site development works include a new connection to the public water main, foul and surface water drainage, access roads, footpaths, vehicle parking, landscaping, boundary treatments and site development works above and below ground. The planning application is accompanied by a Natura Impact Statement (NIS).	No potential for in-combination effects given the Project will have no effect on any European site.
2560232	the construction of a two storey detached dwelling house with attic accommodation, entrance from estate road granted under P.R.19-689, ancillary site works and connection to services granted under P.R.19-689	No potential for in-combination effects given the Project will have no effect on any European site.
2560320	the construction of 2 semi-detached 2 storey houses , construction of boundary walls to rear gardens with pedestrian access gates, connection to mains services together with all associated site works	No potential for in-combination effects given the Project will have no effect on any European site.
2560640	the construction of 2no. two storey semi-detached dwelling-houses, construction of rear boundary walls to private garden spaces, connection to public services and all associated site works	No potential for in-combination effects given the Project will have no effect on any European site.
2587	the provision of 55no. serviced sites and full planning permission for the development of internal roads and pathways; car parking; hard and soft landscaping and boundary treatments; open spaces; public lighting; substation; new vehicular and pedestrian access onto R526 road, and all associated site development works including drainage and foul sewer infrastructure works and SuDS measures	No potential for in-combination effects given the Project will have no effect on any European site.
2595	the construction of a new warehouse building comprising 4 no. warehousing units along with hardstand parking areas, external lighting, boundary fence and walls, 2 no. EV charging spaces, foul and storm connections and all associated site works	No potential for in-combination effects given the Project will have no effect on any European site.

The Limerick City and County Development Plan in complying with the requirements of the Habitats Directive requires that all Projects and Plans that could affect the Natura 2000 sites in the same potential Zone of Influence of the Project site would be initially screened for Appropriate Assessment and if requiring Stage 2 AA, that appropriate employable mitigation measures would be put in place to avoid, reduce or ameliorate negative impacts. In this way any, in-combination impacts with Plans or Projects for the Project area and surrounding townlands in which the Project site is located, would be avoided.

The listed developments have been granted permission in most cases with conditions relating to sustainable development by the consenting authority in compliance with the relevant Local Authority Development Plan and in compliance with the Local Authority requirement with regard to the Habitats Directive. The development

cannot have received planning permission without having met the consenting authority requirement in this regard.

There are no predicted in-combination effects given that it is predicted that the Project will have no effect on any European site.

Any new applications for the Project area will be assessed on a case by case basis *initially* by Limerick City and County Council which will determine the requirement for AA Screening as per the requirements of Article 6(3) of the Habitats Directive.

6. Conclusion

There is no connectivity to any European sites within or outside the potential Zone of Influence.

There are no predicted effects on any European sites given:

- The lack of direct connectivity between the Project and any hydrological pathways; there are no watercourses within the Project boundary and there is no connectivity between the Project site and any watercourses that lead to any European sites;
- There are no predicted emissions to air, water or the environment during the construction or operational phases that would result in significant effects.

It has been objectively concluded by Moore Group Environmental Services that:

1. The Project is not directly connected with, or necessary to the conservation management of the European sites considered in this assessment.
2. The Project is not likely to either directly or indirectly significantly affect the Qualifying interests or Conservation Objectives of the European sites considered in this assessment.
3. The Project, either alone or in combination with other plans or projects, is not likely to have significant effects on a European site.
4. It is possible to conclude that significant effects can be excluded at the screening stage.

It can be excluded, on the basis of objective information, that the Project, individually or in combination with other plans or projects, will have a significant effect on any European site, in the absence of any mitigation.

An appropriate assessment is not, therefore, required.

A final determination will be made by the competent authority in this regard.

7. References

Department of the Environment, Heritage and Local Government (2010) Guidance on Appropriate Assessment of Plans and Projects in Ireland (as amended February 2010).

European Commission (2007) Guidance document on Article 6(4) of the 'Habitats Directive '92/43/EEC: Clarification of the concepts of: alternative solutions, imperative reasons of overriding public interests, compensatory measures, overall coherence and opinion of the Commission. European Commission, Brussels.

European Commission (2018) Managing Natura 2000 sites: the provisions of Article 6 of the 'Habitats' Directive 92/43/EEC.

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, Brussels 28.9.21.

European Commission (2021) Guidance document on the strict protection of animal species of Community interest under the Habitats Directive, Brussels 12.10.21.

NPWS (2019) The Status of EU Protected Habitats and Species in Ireland. National Parks and Wildlife Service, Department of the Environment, Heritage and Local Government, Dublin.

NPWS (2025) National Parks and Wildlife Service Metadata available online at https://www.npws.ie/maps-and-data

Office-of-the-Planning-Regulator (2021) Appropriate Assessment Screening for Development Management OPR Practice Note PN01. March 2021

Trinity Consultants

awnconsulting

Preliminary EIA Screening Technical Note

Project Title: Construction Stage Car Park at Limerick Racecourse for Eli Lilly Limerick

CLIENT	DOCUMENT REFERENCE	DATE
Eli Lilly Limerick	257501.0984ES01	14 January 2026

AWN Consulting Ltd, The Tecpro Building, IDA Business & Technology Park, Clonshaugh, Dublin 17, D17 XD90

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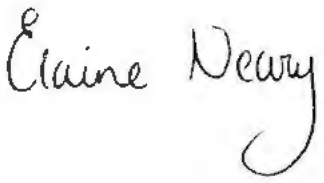
Signature		
Name	Truc Vo	Elaine Neary
Title	Senior Environmental Consultant	Associate
Date	14 January 2026	14 January 2026

Disclaimer
This report considers the specific instructions and requirements of our client. It is not intended for third-party use or reliance, and no responsibility is accepted for any third party. The provisions in this report apply solely to this project and should not be assumed applicable to other developments without review and modification.

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1. INTRODUCTION

On behalf of Eli Lilly Limerick ('the Applicant'), AWN Consulting Limited ('AWN'), a Trinity Consultants Company, has prepared the following Preliminary Environmental Impact Assessment (EIA) Screening Technical Note in support of a Section 5 application to Limerick City and County Council (LCCC). The application relates to the temporary use of 500 no. car parking spaces at Limerick Racecourse (previously permitting under Reg. Ref. 98/1077) in lieu of 500 no. temporary construction related car parking spaces at the Eli Lilly site in Raheen Business Park, Ballycummin, County Limerick (previously permitted under Reg.Ref.24/61160).

The Limerick Racecourse (hereafter referred to as the Racecourse) is located approximately six km, southwest of the Eli Lilly site along the Local Road L1407. The Racecourse, permitted under Reg. Ref. 98/1077, includes 3,000 public car parking spaces, with a separate parking of 100 spaces for horse boxes at the stable and six spaces for utility trucks at the Corporate Tent Area. The relocation of 500 construction stage car parking spaces will be accommodated within the existing 3,000 car parking spaces at the Racecourse. The site location is illustrated in Figures 1.1 and 1-2. The site layout is illustrated in Figure 1-3.

The unforeseen requirement (not identified during the planning application of the Reg. Ref. 24/61160) to use the Limerick Racecourse as a remote temporary construction parking has arisen due to the following factors:

- There is an area of site being used by the ESB for their infrastructure (a proposed substation that will serve the local area).
- The requirement to retain and protect a proportion of Meadow Barley and other 'High Nature Value Areas' by the NPWS.
- Additional developments approved in the intervening period, contributing to cumulative traffic impacts.
- Opportunity to lease the racecourse grounds, which emerged post-application and was considered beneficial to improve commuting for a proportion of construction staff travelling from specific directions.

The proposed location of 500 car parking spaces at the Racecourse is presented in Figure 1-1. These spaces will be situated centrally within the existing car park. The 500 designated parking spaces at the Racecourse, covering approximately 10,000 m², are currently grassed. The proposed works will involve placing interlocking rubber matting over the existing ground surface. The proposed use of the Racecourse car park as a temporary car park facility for the Eli Lilly construction project is scheduled to take place from February 2026 through August 2027. A shuttle bus service will operate from the Racecourse to the construction site, departing every ten minutes during peak arrival periods to transport construction staff to and from the site.

Figure 1-1 Site Location (Source: Jacobs Engineering, Dec 2025)

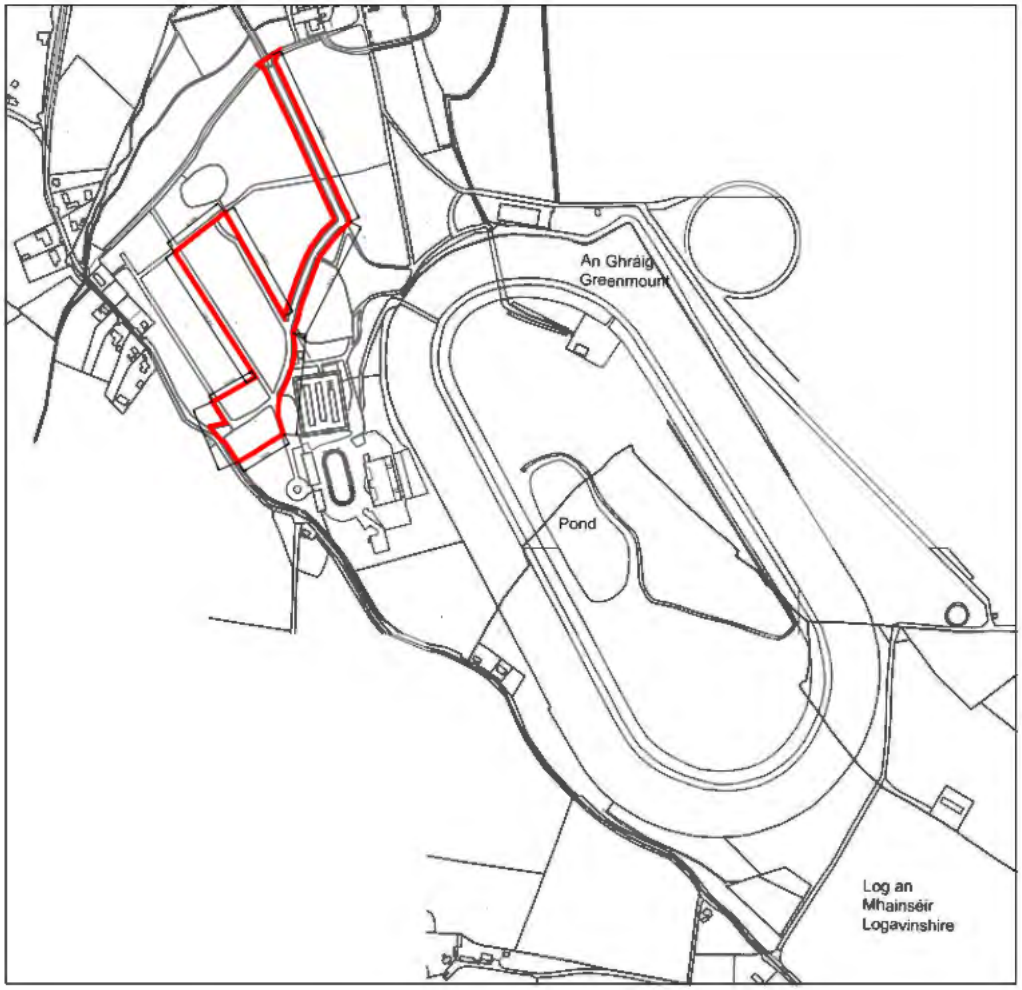


Figure 1-2 Site Location (Source: Jacobs Engineering, Dec 202S)

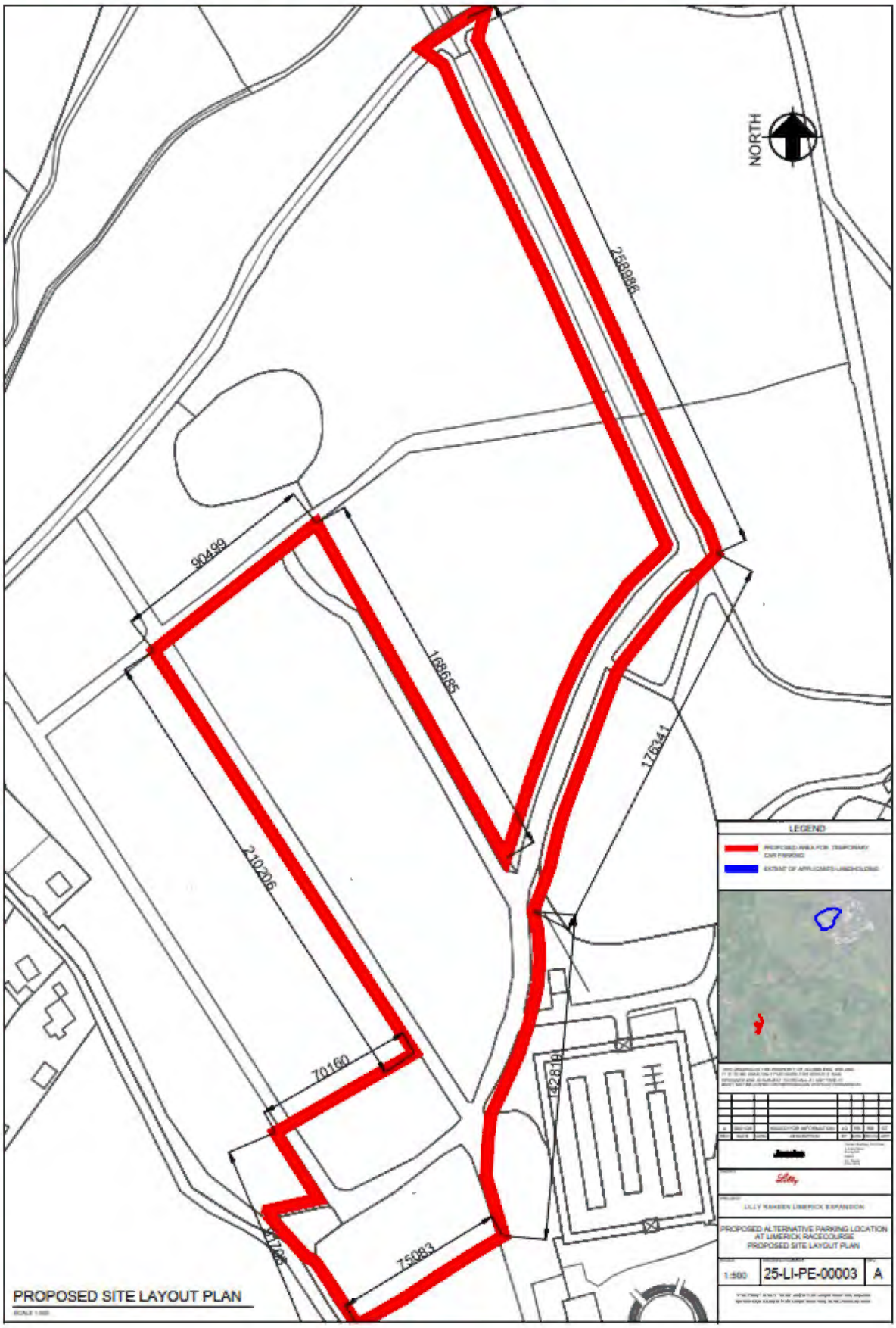
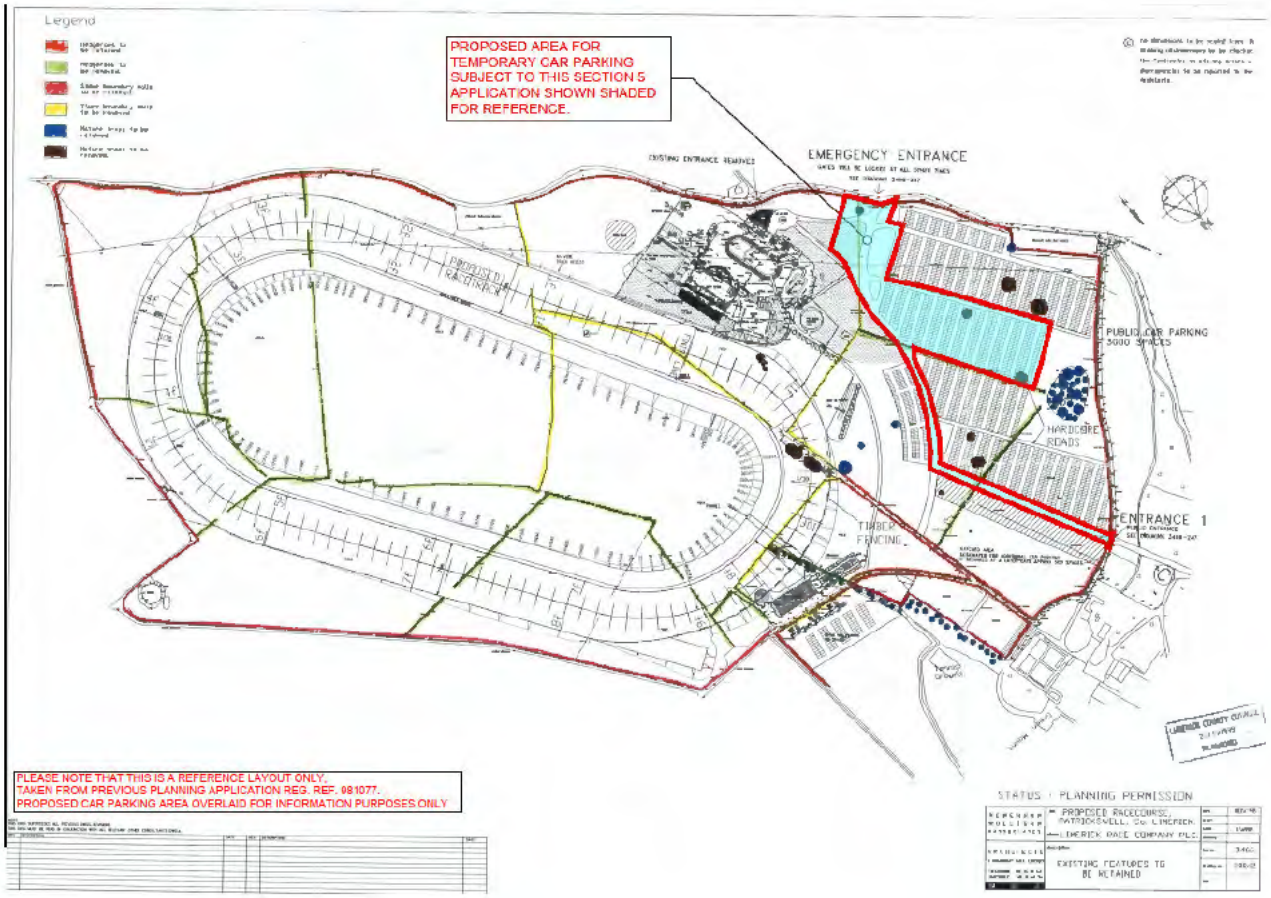


Figure 1-3 Site Layout (Source: Jacobs Engineering, Dec 2025)



1.1 Objective of Report

This Preliminary EIA Screening Technical Note outlines the screening process and preliminary examination conducted by AWN, providing AWN's professional opinion regarding the necessity for a formal Screening Determination for the proposed utilisation of the existing parking spaces (hereafter referred to as the Proposed Development).

The preliminary information presented in this technical note, along with the accompanying application documentation, will facilitate the Competent Authority in establishing whether a formal Screening Determination is required.

1.2 EIA Screening Legislation and Guidance

The legislation and guidance listed below have informed this report and the method of EIA Screening:

- Guidelines on the Information to be contained in Environmental Impact Assessment Reports, (2022). Environmental Protection Agency.
- Environmental Impact Assessment Screening, OPR Practice Note PN02 (Office of the Planning Regulator, 2021).
- European Union (Planning & Development) (Environmental Impact Assessment) Regulations 2018.
- Environmental Impact Assessment of Projects – Guidance on Screening. (2017). European Commission.
- Commission Notice regarding application of the Environmental Impact Assessment Directive (Directive 2011/92/EU of the European Parliament and of the Council, as amended by Directive 2014/52/EU) to changes and extension of projects - Annex I.24 and Annex II.13(a), including main concepts and principles related to these (2021/C 486/01)

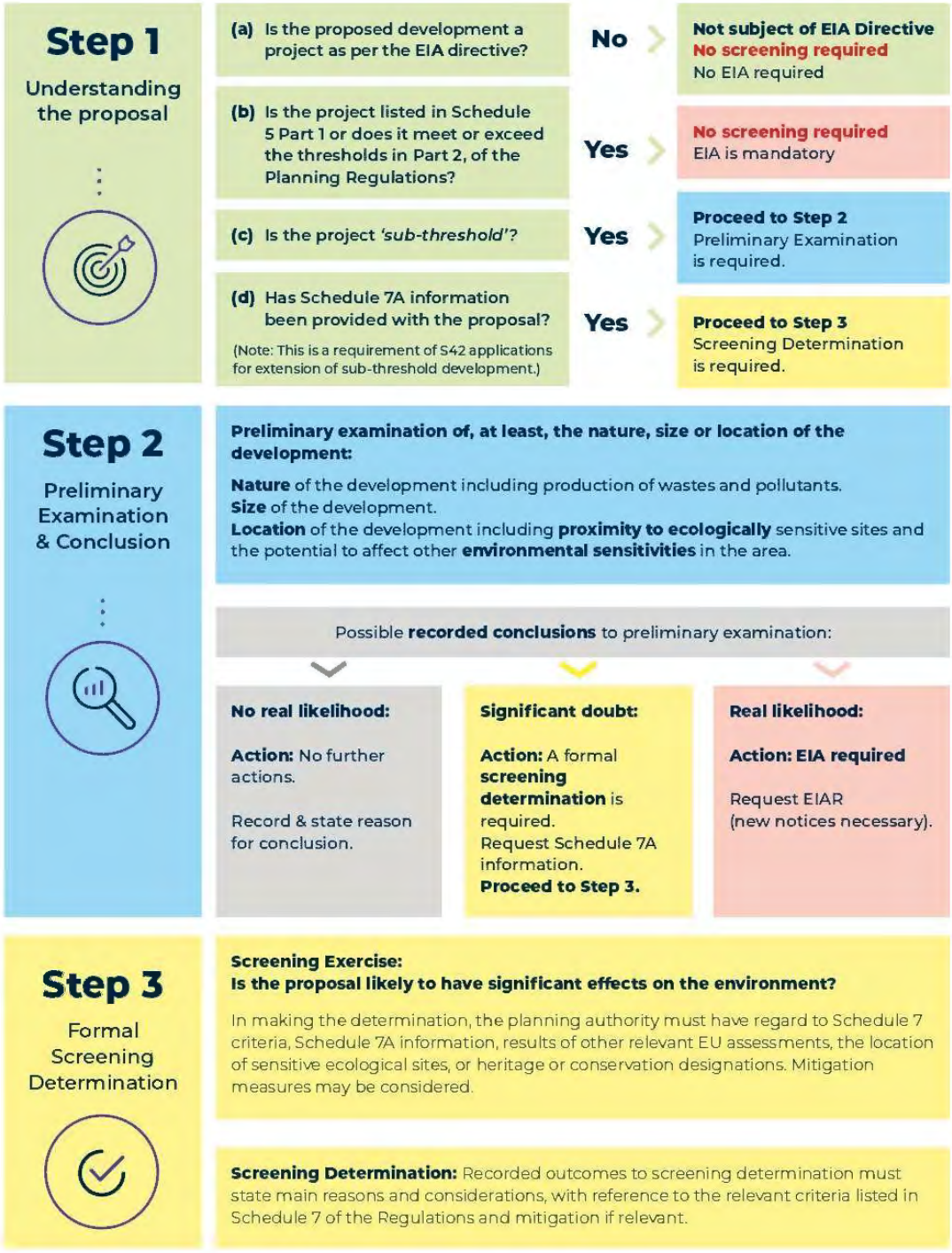
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment. (August 2018). Department of Housing, Planning and Local Government.
- European Union Environmental Impact Assessment (EIA) Directive 2011/92/EU as amended by 2014/52/EU.
- Planning and Development Regulations 2001 (as amended).
- Planning and Development Act, 2000 (as amended).

The national requirements to provide an EIA with a planning application is outlined in *Planning and Development Act 2000 as amended* (the Act) and *Planning and Development Regulations, 2001 as amended* (the Regulations). In addition to the national legislation there are requirements set out in the EU Directive (as referenced above); the EU Directive has been transposed into Irish Legislation.

1.3 Screening Methodology

The screening process and preliminary examination followed in this report is in accordance with the EIA Directive 2011/92/EU of the European Parliament and of the Council as amended by 2014/52/EU and follows the approach to EIA Screening for proposed development proposals (Figure 1-4) set out in the OPR Practice Note PN02 Environmental Impact Assessment Screening (June 2021).

Figure 1-4 Step-by-Step Approach to EIA Screening



Following the OPR Practice Note PN02 as presented in Figure 1-4, if a development is a Project as per the EIA Directive, but it does not mandatorily require an EIA and is categorised as a 'sub-threshold' development, it requires a preliminary examination of the nature, size and location of the proposed development to determine if a screening determination is required. This screening evaluation and preliminary examination are provided in Section 2.0 of this report.

The preliminary examination includes an evaluation of the project's characteristics, the sensitivity of the location of the proposed development, and a preliminary assessment of the potential for significant impacts with regard to Schedule 7 of the Regulations. Schedule 7 of the Regulations outlines the criteria for the

Competent Authority to determine whether a development is likely to have significant effects on the environment.

The Competent Authority must have regard to the Schedule 7 criteria in forming an opinion as to whether or not a development is likely to have significant effects on the environment by virtue, *inter alia*, of their nature, size or location should be subject to EIA.

1.4 Team and Contributors to the EIA Screening Report

This Preliminary EIA Screening Technical Note and the Project has been informed by the accompanying documents submitted with the application (and the relevant listed mitigation measures as included therein). The preparation of this technical note has been completed by AWN and has relied on specialist input from the project team and applicant, as per **Error! Reference source not found.**-1.

Table 1-1 Applicant Project Team

Role	Contributor
Applicant	Eli Lilly Limerick
Civil and structural engineering, in particular, the Traffic Impact Assessment	Jacobs Engineering Ireland Limited
Population and Human Health; Land, Soils, Geology and Hydrology; Air Quality and Climate; Noise and Vibration; Waste Management	AWN Consulting Limited
Appropriate Assessment (AA) Screening Report	Moore Group Limited

This Preliminary EIA Screening Technical Note was prepared by Truc Vo. Truc is a Senior Environmental Consultant in AWN Consulting with expertise in impact assessment, licensing, environmental compliance and project management. Truc has over 16 years of experience in environmental compliance, environmental licensing, and environmental impact assessment in Ireland, Thailand and Vietnam.

This Preliminary EIA Screening Technical Note was reviewed by Elaine Neary. Elaine has a BA (Natural Sciences), an MApplSc. (Environmental Science) and is a Chartered Member of the Institute of Waste Management (MCWIM). She is an Associate in AWN and has 22 years' experience in environmental consultancy with extensive experience in Environmental Impact Assessment, EPA Licencing and Compliance and Waste Management. She has prepared numerous EIA Screening Reports and project managed, coordinated and prepared specialist inputs for numerous EIS/EIA's.

This screening report should be read in conjunction with the specialist reports that are included with the planning application, namely:

- Traffic Impacts of Relocation of Construction Car Parking Spaces from Eli Lilly Construction Compound to Racecourse Limerick, County Limerick (Jacobs Engineering Ireland Limited, 2025).
- Appropriate Assessment (AA) Screening Report for Racecourse Limerick (Moore Group Limited, 2025).

2. SCREENING EVALUATION

2.1 Step 1 – Understanding the Proposal

The initial step in determining the need for EIA is understanding the Proposed Development. This step informs whether further examination, such as a preliminary assessment or a formal screening determination, may be necessary. Table 2-1 below sets out Step 1 of the OPR Practice Note PN02 EIA Screening process, and Table 2.2 sets out the evaluation of the Proposed Development against the definition of a 'project' as per the EIA directive.

Table 2-1 Step 1 – Understanding the Proposal (OPR Practice Note PN02)

Step 1	Response	Explanation
(a) Is the Proposed Development a project as per the EIA directive?	No	The Proposed Development does not constitute a "project" within the meaning of the EU Directive. Under the Directive, a "project" is defined as: • *The execution of construction works or other installations or schemes; or* • *Other interventions in the natural surroundings and landscape, including those involving the extraction of mineral resources.* The 500 car parking spaces at the Racecourse are already permitted under Reg. Ref. 98/1077. The current proposal involves the temporary use of 500 of the permitted Racecourse car parking spaces. The 500 Racecourse parking areas (10,000 m^2) are currently grassed. The proposed works will involve placing interlocking HDPE plastic mats over the existing ground surface. These works are minor in nature, limited in scale, and do not represent a significant intervention in the environment.

The Proposed Development is not considered a project under the EIA directive (Step 1(a)) and therefore no screening or EIA is required. Therefore, it is not relevant or necessary to proceed to Step 1(b) of the OPR Practice Note PN02 EIA Screening process.

However, during the pre-planning meeting with the Limerick County council planning department, it was advised that the Applicant submit a Section 5 application form along with this Preliminary EIA Screening Technical Note and Appropriate Assessment (AA) Screening Assessment.

2.2 Step 2 – Preliminary Examination & Conclusion

Preliminary examination of, at least, the nature, size or location of the development:

- Nature of the development, including production of wastes and pollutants.
- Size of the development.

- Location of the development, including proximity to ecologically sensitive sites and the potential to affect other environmental sensitivities in the area.

2.2.1 Nature and Size of the Proposed Development

2.2.1.1.1 Construction Phase

The nature of the construction phase has been considered with regard to the generation of waste and pollutant emissions and is outlined in Table 2-1 below.

The proposed works will involve placing interlocking HDPE plastic mats over the existing ground surface. This does not require any soil stripping or excavations.

Temporary lighting, signage and bus shelters will also be provided. These will also be placed on the existing ground surface and do not require any installation or ground preparation works. It is proposed that they will remain in situ for the duration of use of the car parking by the Eli Lilly construction personnel i.e. February 2026 to August 2027 (16 months).

Table 2-1 Nature of the Construction Phase of the Proposed Development

Pollutant	Nature of the Construction Phase
Emissions to Land and Water	The potential impact on the underlying aquifer is low based on the limited nature and duration of the works. The proposed works are small scale in nature and are anticipated to take only c. 3 days to complete. Based on a review of the nearest waterbody to the proposed car parking area is the Patrickswell Stream, which is located c. 120 m to the west of the parking area. The Patrickswell stream flows into the Barnakyle River, which subsequently joins the Lower River Shannon, a Special Areas of Conservation (SAC) River - located approximately 4.63km northwest of the Proposed Development. There is no direct pathway from the car parking area to the Patrickswell stream, with any surface water overland flow from the car parking area likely to follow the slope of the ground which slopes down towards the northeast away from the Patrickswell stream. On that basis and given the distance to the stream and that there are no ground works proposed, it is considered unlikely that overland flow from the works in the car park area would enter the stream. It is more likely that, in the absence of storm water management measures, any surface water runoff within the construction site would infiltrate into the ground as per the current situation. No exceedance of water quality objectives as outlined in S.I. No. 272 of 2009, S.I. No. 386 of 2015 and S.I. No. 77 of 2019) is likely by the time the stormwater reaches any nearest Natura 2000 Sites, which would involve a significant distance and a large dilution factor. Construction workers will use existing welfare facilities at Limerick Racecourse for the short duration of construction.
Emission to Air	The potential impact on air quality during the construction phase would be from nuisance construction dust emissions and $PM_{10}/PM_{2.5}$ emissions. Greenhouse gas emissions during the construction phase are expected to arise primarily from construction-related traffic and the embodied energy of construction materials. Construction vehicles and associated machinery may generate limited CO_2 and NO_2 emissions. However, given the relatively small scale of the works and their short duration (c. 3 days)—these emissions are not anticipated to result in any perceptible environmental effects.

Noise Emissions	There will be vehicular movements to and from the site that will use existing roads. Due to the nature of these activities, there is potential for the generation of elevated levels of noise. However, given the relatively small scale of the work and their short duration (c. 3 days) this would not be expected to give rise to significant effects.
Waste Generation	During the construction phase, no waste will be generated from the proposed works as no ground preparation or construction of structures is required. Small volumes of waste may be generated from construction workers. Construction workers will use existing welfare facilities and waste receptacles at Limerick Racecourse for the short duration of the works. Given the relatively small scale of the works and their short duration (c. 3 days) this would not be expected to give rise to any perceptible environmental effects.

The residual impacts of pollutant emissions on potential sensitive receptors are outlined in Section 2.2.2. below.

2.2.1.1.2 Operational Phase

No waste generation is anticipated during the operational phase. The nature of the operational phase of the Proposed Development has been considered with regard to pollutant emissions and is outlined in Table 2-2 below.

The generation of pollutants as a result of the Proposed Development will be limited to those generated by traffic movements to and from the carpark, and the potential for accidental leaks/spills of fuel from the vehicles accessing and parking within the temporary car park.

Table 2-2 Nature of the Operational Phase of the Proposed Development

Pollutant	Nature of the Operational Phase
Emissions to Land and Water	During operation, the risk of a release is minimal as there will be no bulk Fuel or chemical storage and no silt-laden run-off. Stormwater from the temporary car park will be drained naturally, infiltrating into the underlying soil or flowing by overland flow into the grassed areas located to the north east of the Proposed Development. In addition, the potential for hydrocarbon discharge is quite minimal based on an individual vehicle (70 litres) leak/spill being the only source for hydrocarbon release. Even with control measures excluded from consideration, there is no likely impact above water quality objectives as outlined in S.I. No. 272 of 2009, S.I. No. 386 of 2015 and S.I. No. 77 of 2019) in the worst-case scenarios of a vehicle leak/spill of 70 litres, given the distance to the nearest waterbody and the likely direction of overland flow to the north east, away from the stream and therefore there will be no potential for significant effect on any European site. The volume of contaminant release is low and combined with the significant pathways within the aquifer, hydrocarbons will dilute to background levels with no likely impact above water quality objectives as outlined in S.I. No. 272/2009 - European Communities Environmental Objectives (Surface Waters)
	Regulations 22009, S.I. No. 386 of 2015 and S.I. No. 77 of 2019 at any Natura 2000 sites.

Emission to Air	The Proposed Development will not result in any significant emissions of air quality pollutants or greenhouse gases once operational. The operational phase traffic generation will not meet the Transport Infrastructure Ireland (TII) '*Air Quality Assessment of Specified Infrastructure Projects – PE-ENV-01106*' criteria and therefore, a detailed assessment of traffic emissions is not required. There is no potential for significant emissions of pollutants from operational traffic.
Noise Emissions	The outward noise emissions to the surrounding environment from the Proposed Development, when operational, will arise from traffic on surrounding roads. The parking of 3,000 vehicles at the Limerick Racecourse is already permitted under Reg. Ref. 98/1077. The use of 500 spaces for the Eli Lilly construction personnel as well as buses to convey construction personnel to the Eli Lily site, will not increase the vehicle movements beyond the 3,000 permitted. It will result in more frequent traffic movements to/from the site as the use of the car park is likely to be Monday to Saturday for the 16-month duration, but this is not anticipated to result in any significant outward noise emissions.
Waste Generation	No waste will be generated.

2.2.2 Location of the Proposed Development

The location of the Proposed Development has been considered with regard to potential impacts on sensitive environmental receptors and is outlined under the headings below.

Geology and Hydrogeology

Mapping from the Geological Society of Ireland (GSI, 2025) indicates that the bedrock underlying the northern part of the Proposed Development is a Visean limestone & calcareous shale (undifferentiated limestone) and on the southern Proposed Development is Visean limestone & calcareous shale (massive unbedded lime-mudstone). The GSI/ Teagasc (2025) mapping database of the quaternary sediments in the area of the subject site indicates that the principal subsoil type underlying the Proposed Development is till derived from limestones (TLs).

The GSI (2025) National Bedrock Aquifer Map classifies the bedrock aquifer beneath the subject site as a 'LI, Locally Important Aquifer - Bedrock which is Moderately Productive only in Local Zones'. The GSI currently classifies the aquifer vulnerability in the region of the subject site as Extreme (E). The most recent WFD groundwater status for the groundwater body (2019-2024) is 'Good', and the WFD risk score is 'Not at Risk.' There are no recorded Public Supply Source Protection Area or Group Scheme Preliminary Source Protection Areas in the vicinity of the site. The nearest Public Supply Source Protection Area is Coshma GWS, located c. 3.4km south-west of the Proposed Development site.

The importance of the soil and geology attributes for the Proposed Development site is defined as 'low' based on the TII methodology (2009) criteria for rating site attributes. There are no sensitive soil receptors, no identified areas of geological heritage, or groundwater supplies in the vicinity of the site boundary.

The importance of the hydrogeological attributes for the Proposed Development site is defined as 'very high' based on the TII methodology (2009) criteria for rating the importance of hydrogeological attributes. This is due to the regionally important aquifer and its vulnerability. The underlying bedrock comprises Visean limestone and calcareous shale, which are typically associated with groundwater bodies due to

their permeability. However, given that the Proposed Development does not involve any ground works, the potential impact on the groundwater body is considered negligible.

With respect to the foregoing, in addition to the scale and nature of the Proposed Development, it is considered that there is no potential for significant impacts on geological and hydrogeological receptors during the construction or operational phase of the Proposed Development. Therefore, the requirement for sub-threshold EIA does not arise.

Hydrology

The proposed development is permitted development, involves no changes in the existing use of the carpark. The proposed works will involve placing interlocking HDPE plastic mats over the existing ground surface. This does not require any soil stripping or excavations.

The nearest watercourse to the site is the Patrickswell Stream, which is c. 120m to the west at its nearest point. The Patrickswell Stream joins the Barnakyle River c.1.5km downstream. The Barnakyle River then joins the River Maigue c. 7km further downstream where it is designated as part of the Lower River Shannon SAC and the River Shannon and River Fergus Estuaries SPA. It is considered unlikely that overland flow from the construction site would enter the stream. It is more likely that any surface water runoff within the construction site would infiltrate into the ground. No exceedance of water quality objectives as outlined in S.I. No. 272 of 2009, S.I. No. 386 of 2015 and S.I. No. 77 of 2019) is likely by the time the stormwater reaches any nearest Natura 2000 Sites, which would involve a significant distance and a large dilution factor.

Consequently, there is no potential for significant impacts on hydrological receptors during either the construction or operational phases of the development. Therefore, a sub-threshold EIA is not required**.**

Biodiversity and Areas of Conservation

Appropriate Assessment (AA) Screening report has been prepared by Moore Group and is submitted alongside this application. The report concludes that:

There is no direct connectivity between the Proposed Development and any European sites within or outside the potential Zone of Influence. The Project, alone or in combination with other plans, will not have significant effects.

Therefore, an Appropriate Assessment is not required.

Condition 9 of the Planning Permission for the Permitted Racecourse (Reg. Ref. 98/1077), which includes the temporary carpark, states:

The mature trees located within the proposed car parking area and which is intended to remove, as indicated on the Site Layout Map submitted to and received by the Planning Authority on 23rd February, shall be retained in full. The car park area shall be developed around these trees and the trees shall be enclosed within the stout fence during construction, to ensure their protection. Remedial measures to correct existing defects in tree shall be carried out after the construction phase. Detail shall be submitted to the planning authority for agreement prior to commencement of development.

These trees will be protected for the duration the construction and use of the car park for the Eli Lilly construction project. Fencing will be erected around the root protection zone of the trees.

It is proposed to use temporary lighting towers to light the bus set down and car parking area for the duration of use. These are on wheels and will be removed when the car park is no longer required for this use, post August 2027. The location and daily duration of use of the temporary lighting towers will be agreed with an ecologist to minimise any potential effects on bats (if present in the vicinity) during the bat activity season of April to September. It is currently proposed that lights would be turned off at 6pm each evening.

With respect to the foregoing, there is no potential for significant impacts on sensitive habitats, species, or areas of conservation during either the construction or operational phase due to the small scale of the Proposed Development and lack of connectivity to sensitive receptors. Therefore, the requirement for sub-threshold EIA does not arise.

Archaeology and Cultural Heritage

The proposed development is permitted development, involves no changes in the existing use of the carpark. This does not require any soil stripping or excavations.

Consequently, there is no potential for significant impacts on archaeology or cultural heritage during either the construction or operational phases of the development. Therefore, a sub-threshold EIA is not required**.**

Population and Human Health

The proposed development is permitted development, involves no changes in the existing use of the car park. The proposed works will involve placing interlocking HDPE plastic mats over the existing ground surface and provision of temporary lighting, signage and bus shelters. These works are minor in nature, limited in scale, and of short duration (c. 3 days).

It is considered that the only environmental aspect that has the potential to be a nuisance to the local population is in relation to traffic. The traffic impacts during the operational period are assessed in Traffic Impacts of Relocation of Construction Car Parking Spaces from Eli Lilly Construction Compound to Racecourse Limerick, County Limerick (Jacobs Engineering Ireland Limited, 2025). It concluded that: *The junction capacity assessment exercise concluded that 500 temporary car parking spaces can be accommodated at the Limerick Racecourse car park with minimum impact on operational performance of junctions providing access to and from the Limerick Racecourse car park and will support in lowering the Eli Lilly Construction Stage traffic impacts at the Ballycummin Roundabout and M20 Interchange (Junction 3).*

Consequently, there is no potential for significant impacts on populations or human health as a result of the construction or operational phases. Therefore, the requirement for sub-threshold EIA does not arise.

Material Assets (Including Utilities and Traffic/Transportation)

The proposed development is permitted development, involves no changes in the existing use of the car park. The proposed works will involve placing interlocking HDPE plastic mats over the existing ground surface and provision of temporary lighting, signage and bus shelters.

The traffic impacts due to the relocation of Construction Stage Car Parking Spaces from Eli Lilly Construction Compound to Racecourse Limerick during the operational period are assessed in Traffic Impacts of Relocation of Construction Car Parking Spaces from Eli Lilly Construction Compound to Racecourse Limerick, County Limerick (Jacobs Engineering Ireland Limited, 2025). It concluded that: *The junction capacity assessment exercise concluded that 500 temporary car parking spaces can be accommodated at the Limerick Racecourse car park with minimum impact on operational performance of junctions providing access to and from the Limerick Racecourse car park and will support in lowering the Eli Lilly Construction Stage traffic impacts at the Ballycummin Roundabout and M20 Interchange (Junction 3).*

The operation of the temporary car park will be coordinated to avoid conflicts with scheduled racecourse events. Contractors will be notified of event dates in advance and measures will be implemented to reduce the number of vehicles accessing the temporary car park during these periods.

No utilities i.e. water supply, wastewater or drainage infrastructure will be required for the construction or operation of the temporary car park. Construction workers will use the existing welfare facilities at Limerick Racecourse for the short duration of the works. Lighting will be provided via temporary lighting towers.

With respect to the foregoing, it is considered that there is no potential for significant impacts on material assets during either the construction or operational phases of the Proposed Development due to its nature and small scale, and the requirement for sub-threshold EIA does not arise.

Landscape and Visual Impact

The proposed development is permitted development, involves no changes in the existing use of the car park. The proposed construction works will comprise the placement of HDPE plastic mats on the existing ground surface and provision of temporary lighting, signage and bus shelters. These works are minor in nature, limited in scale, and of short duration (c. 3 days). During the operational phase, the use of the car park is consistent with the current use and it anticipated to have an imperceptible effect on landscape and visual impact.

With reference to the foregoing, there is no likelihood of significant negative landscape or visual impacts as a result of the Proposed Development. Therefore, the requirement for sub-threshold EIA does not arise.

Cumulative Impacts

A review of the National Planning Application Database was undertaken. The database was then queried for developments granted planning permission within 1000m of the site within the last three years, these are presented in Appendix A.

The listed developments have been granted permission in most cases with conditions relating to sustainable development by the consenting authority in compliance with the relevant Local Authority Development Plan and in compliance with the Local Authority requirements. The development cannot have received planning permission without having met the consenting authority requirement. There are no predicted perceptible cumulative effects given that it is predicted that the proposed development in itself will be temporary, it is consistent with the permitted use of the Limerick Racecourse car parking and will not give rise to any potentially significant effects. Therefore, a requirement for sub-threshold EIA does not arise.

In addition, the Ryder Cup event will take place in September 2027 at Adare Manor in Adare, County Limerick. There is a park and ride facility planned to support the event which is in the vicinity of Limerick Racecourse. However, since the Ryder Cup event does not take place until September 2027, there will be no overlap with the proposed development which will only use the car park at Limerick Racecourse until August 2027.

Interactions

There is limited potential for interactions between the environmental factors outlined in Sections 2.2.1 and 2.2.2 during both the construction and operational phases of the Proposed Development. However, no significant environmental impacts are anticipated, and any interactions between these factors are not expected to result in significant adverse effects on the environment.

2.3 Step 2 Conclusion

The purpose of this Preliminary EIA Screening Technical Note is to determine whether an Environmental Impact Assessment Report (EIAR) or Environmental Impact Screening Report is required to accompany the application to Limerick City and County Council ('LCCC') for the Proposed Development.

The Proposed Development is not considered as a "project" under the EIA Directive. In addition, following a preliminary examination of the nature, scale, and location of the Proposed Development (as outlined in Section 2.2), it is concluded that there is no real likelihood of significant environmental effects. Therefore, neither a formal screening determination nor an EIA is required.

APPENDIX A. PLANNING APPLICATIONS GRANTED

Planning applications granted permission in the vicinity of the Project.

Planning Ref.	Description of development
21920	construction of an apartment building consisting of 3-storeys of residential accommodation above lower ground floor/basement consisting of the following accommodation mix; 8 x No. 2-bedroom apartments and 5 x No. 1-bedroom apartments, total 13 x No. apartments. The proposed works to include internal circulation and service areas on each floor, car parking, bicycle storage and ancillary storage areas at lower ground floor/basement, together with connection to existing public sewer network including all necessary enabling works, creation of new access points, creation of private and communal open space/amenity areas, works to site boundaries, ESB sub-station, public lighting, bin storage, surface car parking and bicycle stands and all ancillary site works including the demolition of an existing outbuilding
221257	the demolition of an existing single storey dwelling house and the construction of a new replacement single storey dwelling with carport, out buildings, site landscaping, installation of a new wastewater treatment system and ancillary works to the public road boundary to reconfigure the existing vehicle entrance
22225	the construction of a new vehicular entrance off main street & provision of visitor and staff car parking facilities, construction of an extension to existing office/ warehouse building together with all associated site works
23125	the construction of a single storey extension to the existing dwelling house, the conversion of the existing attic to a habitable space including new rooflights in the existing roof, and the replacement of the front boundary fence including the relocation of the vehicular entrance and all associated site works
2360158	existing limestone cladding to front elevation as built, 3x rooflight windows to existing roof as built and site boundary as built
2360746	the alteration to previously approved Planning ref no's 18/200 ,18/1193 & 19/444. The alteration consists of the reduction in roads levels and dwelling floor levels for all three phases, and all associated site development works
2360936	the change of use of the existing resource centre/office building known as 'Resource House', Main Street, Patrickswell, Co.Limerick to residential dwelling use. This proposed change of use relates to the entirety of the existing building, associated services and the building's site and boundaries
2460610	the modification of a scheme permitted under Planning Ref. No. 21/873. The modification results in a net increase of 4 units on the wider site and consists of: the inclusion of houses 6-9 which are 2 blocks of semi d's to the north western boundary of the site to reflect site relevant revisions to the latest Local Area Plan, minor landscaping revisions, site ancillaries, all associated development and site works. The planning application is accompanied by an NIS (Natura Impact Statement)
2460650	the construction of a new dwelling house, 2 No. private sheds, site entrance and access road along with all associated site works and services
2560022	construction of 6 No. two storey terraced dwellings inclusive of the following; removal of existing front boundary wall and replacement with new low level wall with metal railings and individual pedestrian access gates, vehicular and pedestrian access to the rear, 'off street' parking to the rear, boundary treatment, landscaping and lighting and all ancillary site works inclusive of connections to adjacent services and utilities
2560133	alteration to previously approved Planning ref no. 18/1193. The alterations consist of a change of house type from 2 bed to 3 bed for House No's 5-8 and the reposition of houses 47 and 48 to facilitate a revised site boundary adjacent house no. 48 and all associated site works
2560156	a residential development comprising 63 no. residential units, (4 no. detached houses, 50 no. semi-detached houses, 9 no. terrace houses), a Creche, new entrance onto the existing R526 road and all ancillary site development works. Ancillary site development works include a new connection to the public water main, foul and surface water drainage, access roads, footpaths, vehicle parking, landscaping, boundary treatments and site development works above and below ground. The planning application is accompanied by a Natura Impact Statement (NIS).
2560232	the construction of a two storey detached dwelling house with attic accommodation, entrance from estate road granted under P.R.19-689, ancillary site works and connection to services granted under P.R.19-689
2560320	the construction of 2 semi-detached 2 storey houses , construction of boundary walls to rear gardens with pedestrian access gates, connection to mains services together with all associated site works
2560640	the construction of 2no. two storey semi-detached dwelling-houses, construction of rear boundary walls to private garden spaces, connection to public services and all associated site works
2587	the provision of 55no. serviced sites and full planning permission for the development of internal roads and pathways; car parking; hard and soft landscaping and boundary treatments; open spaces; public lighting; substation; new vehicular and pedestrian access onto R526 road, and all associated site development works including drainage and foul sewer infrastructure works and SuDS measures

Planning Ref.	Description of development
2595	the construction of a new warehouse building comprising 4 no. warehousing units along with hardstand parking areas, external lighting, boundary fence and walls, 2 no. EV charging spaces, foul and storm connections and all associated site works

3. REFERENCES

- EU (2017a) Environmental Impact Assessment of Projects Guidance on Screening. EU Luxembourg: 2017.
- EU (2017b) Guidance on the preparation of the Environmental Impact Assessment Report. EU Luxembourg: 2017.
- EC (2017) Environmental Impact Assessment of Projects – Guidance on Screening. European Commission.
- EC (2021) Commission notice regarding application of the Environmental Impact Assessment Directive (Directive 2011/92/EU of the European Parliament and of the Council, as amended by Directive 2014/52/EU) to changes and extension of projects - Annex I.24 and Annex II.13(a), including main concepts and principles related to these (2021/C 486/01)
- DHPLG (2018) Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment. Department of Housing, Planning and Local Government.
- EC (2017) Environmental Impact Assessment of Projects: Guidance on the preparation of the Environmental Impact Assessment Report, European Commission, 2017 http://ec.europa.eu/environment/eia/eia-support.htm
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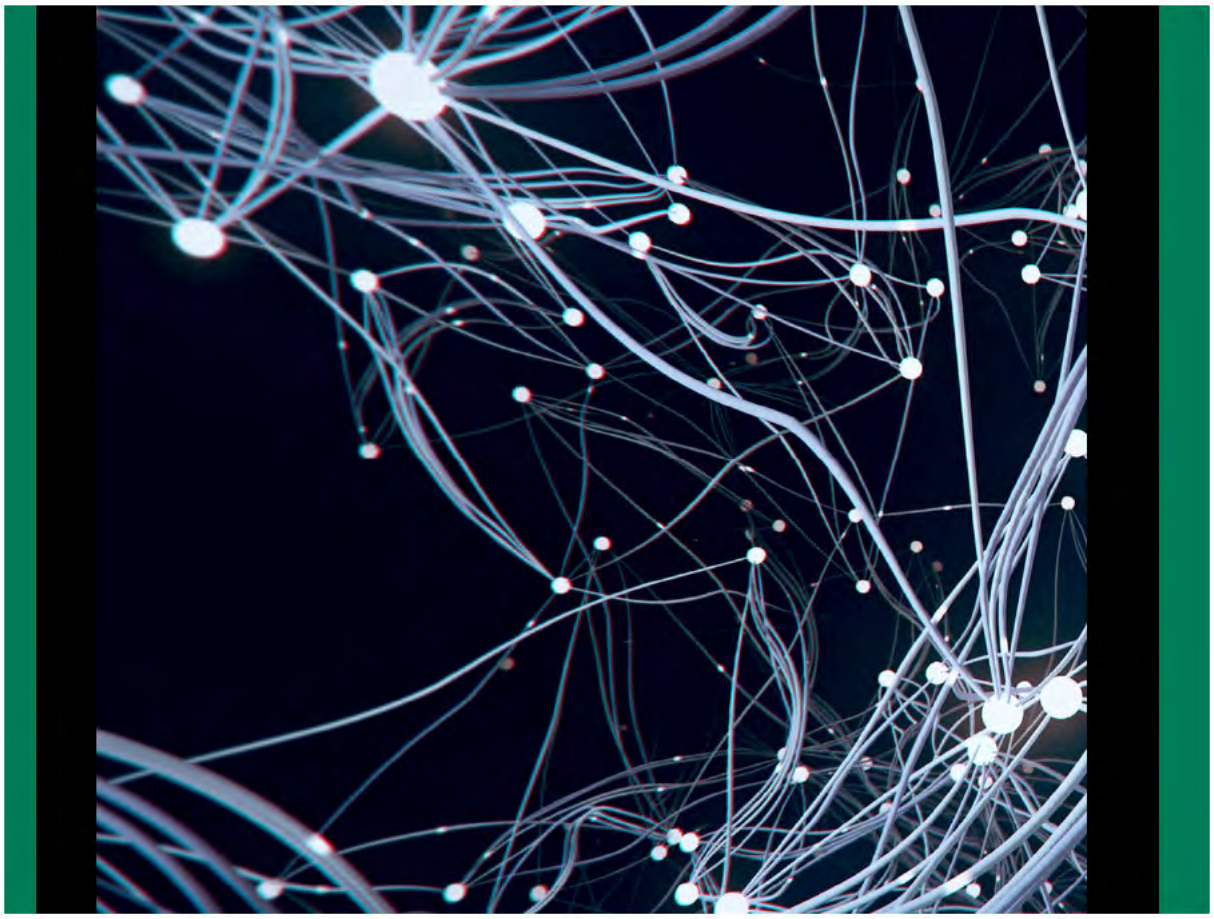
- EPA (2022) Environmental Protection Agency. Guidelines on the Information to be contained in Environmental Impact Assessment Reports. EPA.
- TII (2009) Guidelines on Procedures for Assessment and Treatment of Geology, Hydrology and Hydrogeology for National Road Scheme. Transport Infrastructure Ireland.
- TII (2011) Guidelines for the Treatment of Air Quality During the Planning and Construction of National Road Schemes. Transport Infrastructure Ireland.
- Traffic Impacts of Relocation of Construction Car Parking Spaces from Eli Lilly Construction Compound to Racecourse Limerick, County Limerick (Jacobs Engineering Ireland Limited, 2025).
- Appropriate Assessment (AA) Screening Report for Racecourse Limerick (Moore Group Limited, 2025)

Technical Note

Document no: 01
Revision no: 01

Traffic Impacts of Relocation of Construction Stage Car Parking Spaces from Eli Lilly Construction Compound to Racecourse Limerick, County Limerick

28 October 2025



Technical Note

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Project name:	Traffic Impacts of Relocation of Construction Car Parking Spaces from Eli Lilly Construction Compound to Racecourse Limerick, County Limerick.		
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Jacobs Engineering Ireland Limited

Termini Building,
2nd Floor,
3 Arkle Road, Sandyford,
D18 C9C5
Ireland

T +353 (0)1 269 5666
www.jacobs.com

Contents

Figures

Tables

1. Introduction

Jacobs has been appointed by Eli Lilly (Kinsale) Limited to prepare a Technical Note (TN) to assess the traffic impacts of relocating of 500 Construction Stage car parking spaces from Eli Lilly campus to Limerick Racecourse during the ongoing proposed expansion within Eli Lilly Biopharmaceutical Manufacturing Campus, located at Raheen Business Park, Raheen, County Limerick.

The existing Eli Lilly campus is located within the Raheen Business Park north of Ballycummin Avenue and bounded by R526 towards the west with construction compound located within Eli Lilly campus. Limerick Racecourse is located approximately six km, southeast of Eli Lilly site on the Local Road L1407.

The Traffic Impact Assessment (TTA) prepared as part of the planning process for the proposed expansion within Eli Lilly Biopharmaceutical Manufacturing Campus (Phase -2), showed that there would be approximately 1,475 number of construction staff working at the Eli Lilly site during the peak construction activity period. Of these 1,475-construction staff, it is assumed that 15% of these construction staff are likely to travel by sustainable modes and 85% by car mode.

With the temporary relocation of 500 construction car parking spaces from Eli Lilly site to Limerick Racecourse, the equivalent construction staff cars are anticipated to drive up to the Limerick Racecourse and utilise their parking. Therefore, it is important to understand the number of construction staff arriving at the Limerick Racecourse.

Table 1.1 summarises the construction staff trip generation during the peak construction activity period based on the TTA.

Table 1.1: Construction Staff Trip Generation

Mode	Mode Share (%)	Total Construction Staff
By sustainable modes (Cycle, Walking, Shuttle bus)	15%	221
By Car	85%	1,254
Total	100%	1,475

The above table presents that 1,254-construction staff would travel to the Eli Lilly site by car mode. Assuming a car occupancy of 1.5 staff per car, it results in 836 staff cars arriving daily during the peak construction phase. With 500 construction staff cars going to park at Limerick Racecourse, the car parking for the remaining 336 construction staff cars would be provided within the existing Eli Lilly site.

Based on the assumptions considered within the TTA, using a car occupancy of 1.5 staff/car, 750 construction staff will be accessing the car parking at Limerick Racecourse. These construction staff will then be using shuttle bus to transfer to and from the Eli Lilly campus. It is envisaged that double decker shuttle buses would be provided to transfer construction staff between the Eli Lilly campus in Raheen Business Park and the Limerick Racecourse car park. It is also assumed that construction staff cars travelling to and from the Racecourse car park would continue to follow the proposed arriving and departing profile and routing, presented in the TTA.

This TN summaries the outcome of reassignment of construction phase car trips on the wider network and supporting the traffic impact analysis of routing construction traffic through the M20 Interchange (Junction 4) junctions providing access to Limerick Racecourse car park.

2. Traffic Flow Changes

The Automatic Number Plate Recognition (ANPR) survey carried out on 12th March 2024 as part of proposed expansion within Eli Lilly Biopharmaceutical Manufacturing Campus (Phase 2) Planning Application gave an understanding of the wider road cordon distribution of the ongoing construction staff cars arriving and departing at the Eli Lilly campus.

The ANPR locations are shown in **Figure 2.1** and the distribution of arriving construction staff cars at the survey locations is illustrated in **Table 2.1**.

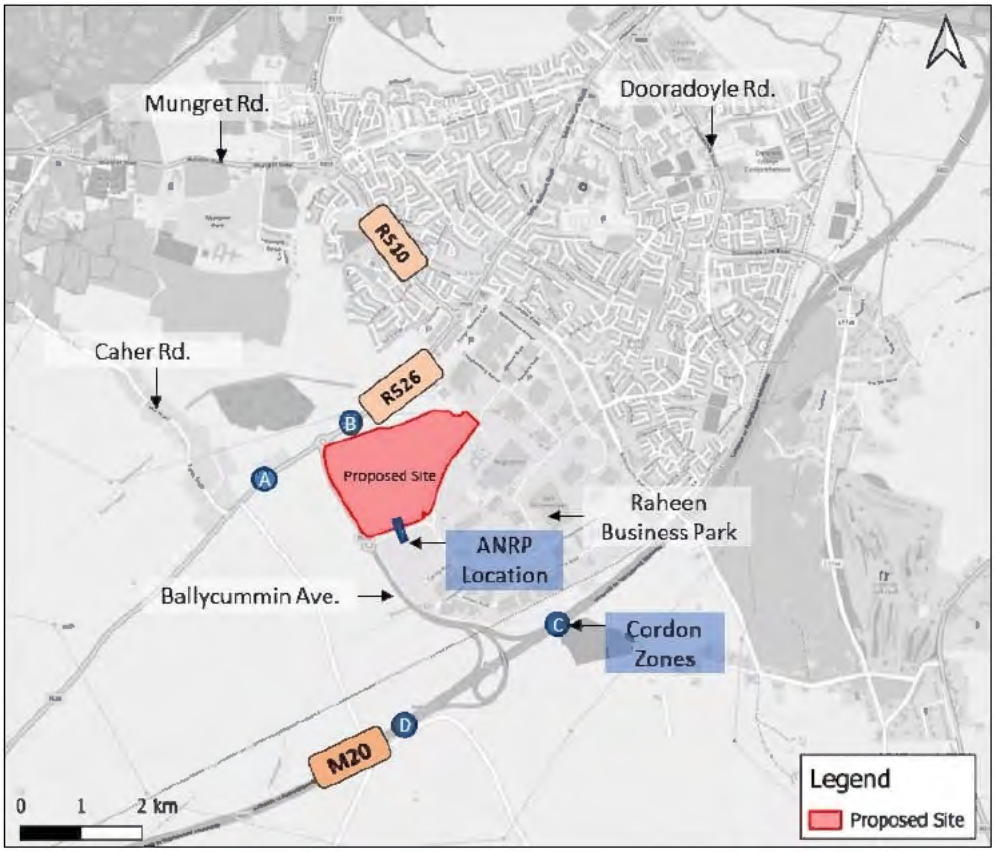


Figure 2.1: ANPR Survey Location

Table 2.1: ANPR Survey Cordon Trip Distribution

Codon Location	Arrival Distribution	Const. Staff	Equivalent Const. Staff Cars
Zone A	10%	131	87
Zone B	12%	155	103
Zone C	52%	655	437
Zone D	20%	250	167
Roches Avenue	5%	63	42
Total	100%	1,254	836

The above cordon trip distribution indicates that approximately of all the construction car trips 95% of the of all construction car trips route via Ballycummin Avenue and 5% via Roches Avenue within the Raheen Business Park.

Out of the 95% arriving via Ballycummin Avenue, 72% will approach via M20 Interchange – Junction 3 (Zone C and D), while 10% will come from Zone A (R526 Southwest) with 12% coming from Zone B (R526 Northeast).

Considering the above trip distribution and construction car trips that would be relocated to the Limerick Racecourse is presented in **Table 2.2**.

Table 2.2: Eli Lilly and Limerick Racecourse Construction Stage Car Parking Distribution

Codon Location	Total Cont. Staff Cars	Const. Staff Cars accessing Eli Lilly campus	Const. Staff Cars likely to park at Limerick Racecourse
Zone A	87	32	55
Zone B	103	38	65
Zone C	437	162	275
Zone D	167	62	105
Roches Avenue	42	42	-
Total	836	336	500

Overall, the relocation of parking spaces would significantly reduce the level of construction traffic going through the M20 Interchange Junction 3, and Loughmore and Ballycummin Roundabout, which in turn would lower the construction traffic impacts of the permitted Eli Lilly Phase 2 development at the junctions.

Shuttle Bus Transfers

The 500 construction staff cars relocated to the Racecourse car park would generate 750 staff trips that needs to be transferred to and from construction compound within the existing Eli Lilly campus.

Assuming a double decker bus with average capacity of 70 people, 11 number of buses would be needed to shuttle 750-construction staff during a typical weekday to and from Limerick Racecourse. It is proposed that the shuttle bus route would be via the R526, the R510 and Ballycummin Roundabout.

2.1 M20 Interchange (Junction 3) and surrounding Road Network

The relocation of 500 cars during the construction phase, from the existing Eli Lilly construction compound, would decrease construction car trips arriving and departing via the Ballycummin Avenue and Ballycummin Roundabout, by 120 cars from zones A and B (via R526/ R510 Loughmore Roundabout) and 380 cars arriving from zones C and D (M20 Interchange Junction 3).

Therefore, the proposed car park relocation during the Construction Stage would decrease the anticipated traffic delays and queueing at the Ballycummin Roundabout and the M20 Interchange Junction 3.

The proposed relocation of car parking would also increase around 11 shuttle buses (i.e. 22 PCUs) arriving departing via R526 between the Eli Lilly campus and Limerick Racecourse.

Table 2.3 and **Table 2.4** present a comparison between inbound traffic flows at Loughmore Roundabout and Ballycummin Roundabout during Phase 2 construction activities at existing Eli Lilly site and construction activities with the temporary relocation of construction staff parking spaces from Eli Lilly site to Limerick Racecourse.

Table 2.3 Construction AM Year Peak Arrivals percentage decrease in traffic flows *(in PCUs)*

Total Junction Inbound Flows	AM Arrivals (06:00 – 07:00)			AM Arrivals (07:00 – 08:00)		
	Base	Base + Const.	Base + Const. with Re-Routing	Base	Base + Const.	Base + Const. with Re-Routing
Loughmore Rbt	525	649 (23.5%)	642 (-1.0%)	1,219	1,304 (7.0%)	1,298 (-0.4%)
Ballycummin Rbt	884	1,397 (58.0%)	1,169 (-16.4%)	1,474	1,831 (24.2%)	1,614 (-11.8%)

Table 2.4 Construction PM Year Peak Arrivals percentage decrease in traffic flows *(in PCUs)*

Total Junction Inbound Flows	PM Arrivals (17:00 – 18:00)			PM Arrivals (18:00 – 19:00)		
	Base	Base + Const.	Base + Const. with Re-Routing	Base	Base + Const.	Base + Const. with Re-Routing
Loughmore Rbt	1,251	1,285 (2.7%)	1,294 (0.7%)	860	912 (6.0%)	914 (0.2%)
Ballycummin Rbt	1,525	1,712 (12.2%)	1,605 (-6.2%)	858	1,147 (33.7%)	985 (-14.2%)

As presented in Table 2.3 and Table 2.4, the relocation would decrease inbound traffic at Ballycummin Roundabout.

2.2 M20 Interchange (Junction 4) and surrounding Road Network

With the relocation of 500 parking spaces to Limerick Racecourse car park, traffic corresponding to 500 parking spaces will re-route via M20 Interchange (Junction 4). Therefore, following three junctions on the adjacent road network would experience increase in traffic flows:

1. R526 Roundabout
2. M20 northbound off slip/ R526 Priority Junction
3. M20 southbound off slip/ L1407 Roundabout

2.2.1 R526 Roundabout

The construction staff cars approaching the existing construction compound from Zone A (i.e. R526 south) and Zone B (R526 north) would now access the Limerick Racecourse via R526/ R526 Overbridge Roundabout.

Therefore, it is expected that 55 cars (Zone A) passing the R526 Roundabout previously would now turn right turn at the roundabout to access Limerick Racecourse. Likewise, 65 cars approaching from Zone B, would travel further south to R526 Roundabout and turn left turn at this roundabout towards the Limerick Racecourse.

In addition, there would be additional 11 shuttle buses (i.e. 22 PCUs) transferring staff to and from Limerick Racecourse routing via the R526 Roundabout.

2.2.2 M20 northbound off slip/ R526 Priority Junction

It is expected that 120 cars (Zone A and B) would now access R526 Overbridge towards the Limerick Racecourse. And 105 cars (Zone D) would access Limerick Racecourse utilising the M20 northbound off slip road. In addition, there would be additional 11 shuttle buses (i.e. 22 PCUs) transferring staff to and from Limerick Racecourse routing via theR526 Roundabout.

2.2.3 R526/ M20 southbound off slip/ L1407 Roundabout

The reassignment of construction traffic indicates that 275 cars arriving at Eli Lilly site from the M20 northeast (Zone C) would continue travelling south exiting at Junction 4 to access the L1407 using M20 Junction 4 southbound off slip. Similarly, 105 staff cars approaching from M20 south (Zone D) would access L1407 using the Junction 4 northbound off slip.

In total, around 380 construction staff cars are likely to arrive via M20 Interchange (Junction 4) off slips to access Limerick Racecourse.

In addition, R526/ L1407 Roundabout would also experience additional 120 cars arriving from the R526/ R526 Roundabout. Further, 11 shuttle buses (22 PCUs) transferring construction staff between Limerick Racecourse and Eli Lilly campus will also be using the R526/ L1407 Roundabout.

With the expected increase in traffic flows during the morning and evening peak hours, operational performance of the above three junctions of the M20 Interchange 'with' and 'without' the construction traffic, has been carried out and discussed in the next section of this TN.

2.3 Existing Traffic Flow Characteristics

To assess the impact of the temporary relocation of 500 construction car parking spaces from Eli Lilly site to Limerick Racecourse on the surrounding road network, a 24-hour classified Junction Turning Counts (JTCs), and queue length surveys were carried out at the three junctions identified above. The traffic surveys were undertaken on Thursday, 22nd May 2025.

In addition, to understand the weekday variation in traffic flow at the M20 Interchange (Junction 4) a 24-hours seven-day Automatic Traffic Counts (ATC) were also carried out from Thursday 22nd May to Wednesday 28th May 2005.

The traffic count locations are presented in Figure 2.2.

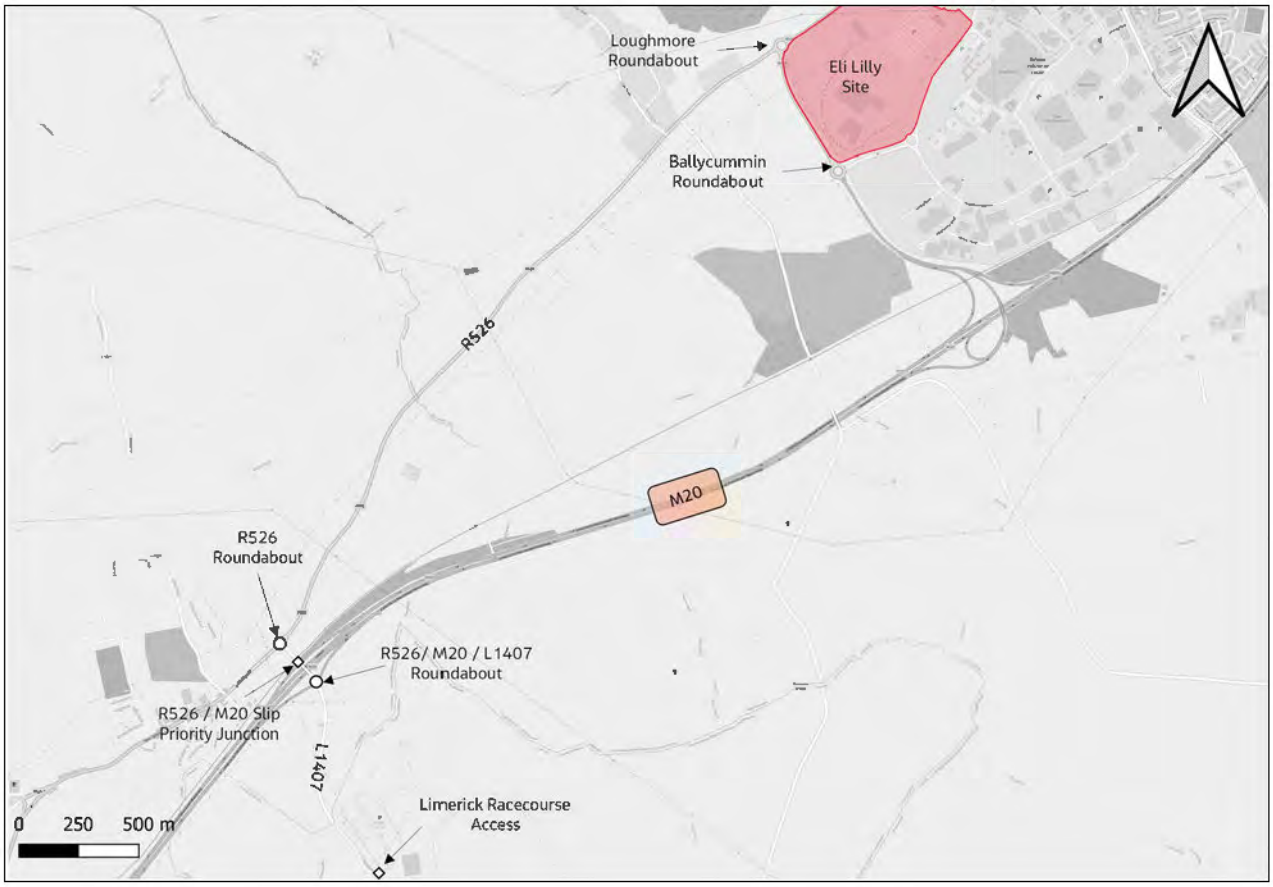


Figure 2.2 Traffic Survey Locations

Figure 2.3 shows weekday hourly traffic profile (Monday to Friday) along the R526. The weekday hourly profile illustrates Thursday being a good representation of a typical weekday.

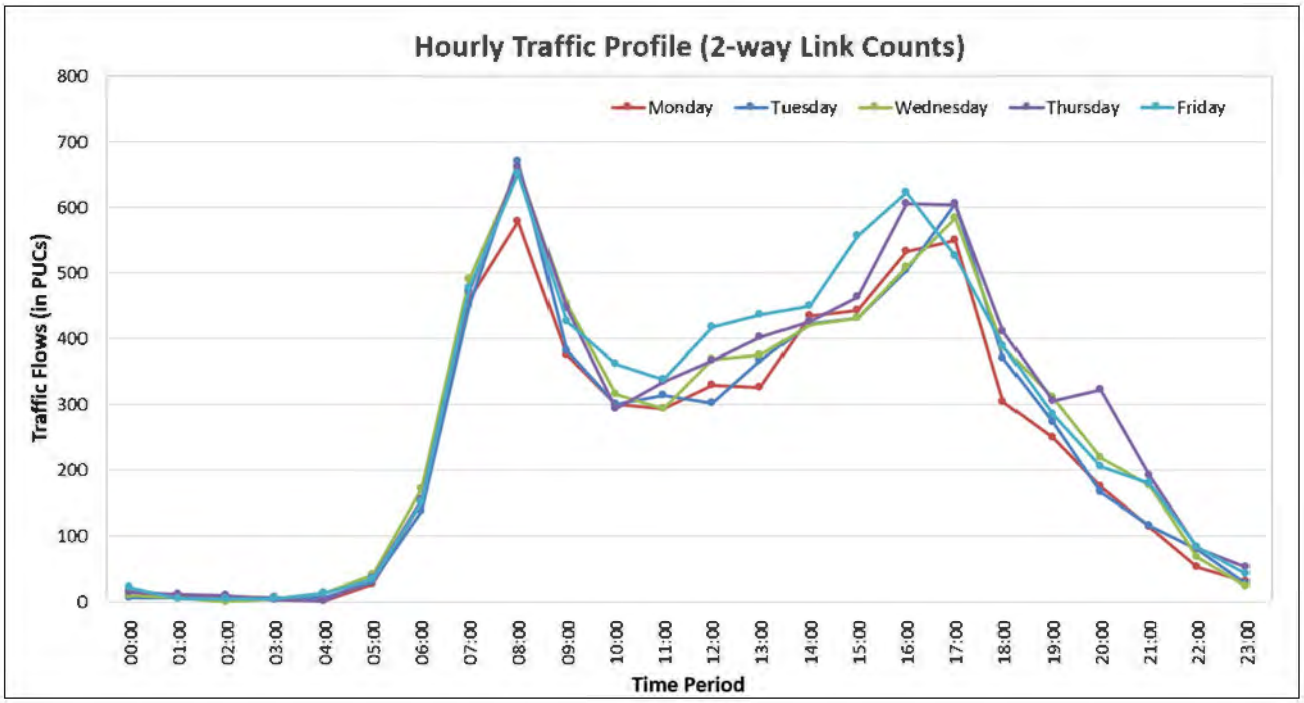


Figure 2.3 Hourly Traffic Profile on R526 (over the M50 Interchange Bridge, Junction 4)

Figure 2.4 presents the hourly traffic profile from the three junctions turning counts throughout the day.

It should be noted that each 15-minute time segment presented corresponds to one-hour traffic flows to determine the peak time within a peak hour. The observed traffic counts for the three junctions in the study area show that the road network peaks follow a typical commuter travel peak trend. The AM peak hour occurs between 07:45 to 08:45 in the morning and the PM peak hour occurs from 16:30 to 17:30 in the evening.

The road network peak hours were the same hours observed during the traffic surveys carried out on 12th March 2024 as part of the Phase 2 Planning Application presented in the TTA.

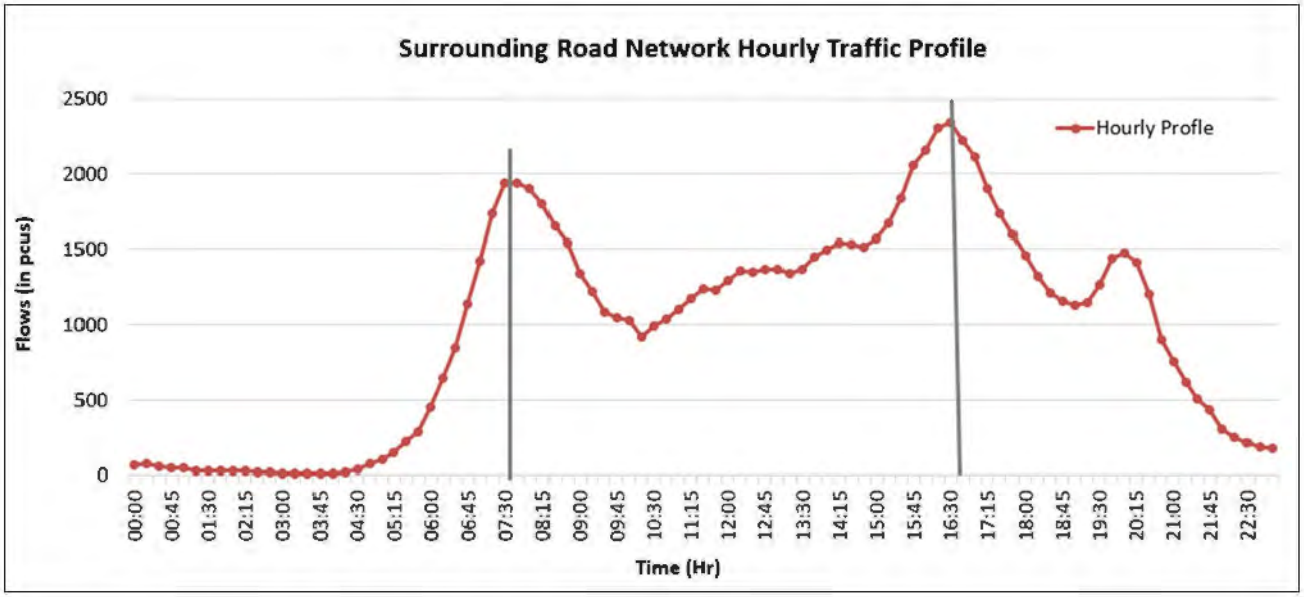


Figure 2.4 Surrounding Road Network Hourly Traffic Profile

2.4 Traffic Assessment Scenarios

The following scenarios have been assessed for the traffic flow assessment and junction operational performance and are based on the peak construction arrival and departure periods as presented in the TTA.

- Construction peak activity year AM peak arrivals
    1. 06:00 to 07:00; and
    2. 07:00 to 08:00;

- Construction peak activity year PM peak departures
    1. 17:00 to 18:00; and
    2. 18:00 to 19:00.

In addition, a sensitivity scenario is also assessed considering if all the construction staff cars corresponding to 500 car parking spaces arrive during the road network peak hour.

- Road Network AM Peak Hour (07:45 – 08:45); and
- Road Network PM Peak Hour (16:30 – 17:30);

It should be noted that the traffic assessment considers all the known permitted developments (as presented in the TTA) plus re-routing of 500 construction staff cars plus remaining construction staff cars arriving and departing the Eli Lilly site to understand the percentage increase in traffic flows due to the temporary relocation to Limerick Racecourse during the construction phase of the Proposed Development.

Table 2.5 summarises the percentage increase in the flows at the key junctions between the 'base' and 'base with Racecourse' scenarios for the Construction Year.

Table 2.5 Construction Year Peak Arrivals percentage increase in traffic flows *(in PCUs)*

Total Junction Inbound Flows	AM Arrivals (06:00 – 07:00)		AM Arrivals (07:00 – 08:00)		PM Arrivals (17:00 – 18:00)		PM Arrivals (18:00 – 19:00)	
	Base	Base with Re-Routing	Base	Base with Re-Routing	Base	Base with Re-Routing	Base	Base with Re-Routing
R526 Roundabout	258	392 (52.3%)	758	872 (15.1%)	1,002	1,059 (5.6%)	675	748 (10.8%)
M20 northbound off slip/ R526 Priority Junction	148	298 (101.7%)	472	613 (30.0%)	641	762 (18.9%)	436	613 (40.7%)
M20 southbound off slip/ L1407 Roundabout	75	353 (368.2%)	206	468 (127.7%)	562	712 (26.7%)	352	560 (59.2%)

The re-routing predicts that there will be an increase in traffic flows of more than 10% in the AM peak periods. However, the increase in percentage terms looks significant but it is largely due to the low number of traffic flows at these junctions in the base scenario.

Considering that the junctions show an increase in traffic flows of more than 10%, a detailed junction capacity analysis is carried out at these junctions and discussed in the next section.

2.5 Junction Capacity Analysis

Junction capacity analysis has been carried out using Junction 10 for the assessment of priority-controlled and roundabout junctions using the 'Lane Simulation' (advanced modelling feature), which allows lane utilisation on roundabout approaches to be realistically modelled and simulated in accordance with the existing lane markings. This approach has been taken to ensure that the junction models reflect existing operational performance of the junctions.

Junction performance results have been summarised as Ratio of Flow to Capacity (RFC) and Average Mean Maximum Queue (MMQ), that is the total number of vehicles in queue, for all lanes on the approach arm expressed in PCU values. An RFC value of 0.85 is generally regarded as the practical limit for approach roads at a junction. Junctions operating below this threshold should operate efficiently and within capacity.

The base network peak operational performance of the three junctions has been assessed to evaluate that the junction model reflects performance relative to observed queue.

2.5.1 Peak Construction Stage Assessment

Table 2.6 shows the junction capacity assessment during construction AM peak arrivals at 06:00 to 07:00 and 07:00 to 08:00 and Table 2.7 shows the capacity assessment during construction PM peak departures at 17:00 to 18:00 and 18:00 to 19:00.

Table 2.6 Construction AM Peak Hours Junction Capacity Assessment *(in PCUs)*

Junction Approach	(06:00 - 07:00)				(07:00 - 08:00)			
	Base		Base with Re-Routing		Base		Base with Re-Routing	
	MMQ	RFC	MMQ	RFC	MMQ	RFC	MMQ	RFC
R526 Roundabout								
R526 North	< 1	0.04	<1	0.08	<1	0.12	<1	0.16
R526 East	<1	0.04	<1	0.05	<1	0.11	<1	0.12
R526 South	<1	0.14	<1	0.19	1	0.39	1	0.45
M20 northbound off slip/ R526 Priority Junction								
R526 East	<1	0.01	<1	0.02	<1	0.03	<1	0.04
M20 Off-Slip	<1	0.05	<1	0.07	<1	0.20	<1	0.22
M20 southbound off slip/ L1407 Roundabout								
M20 Off-Slip	<1	0.03	<1	0.14	<1	0.06	<1	0.17
L1407	<1	0.03	<1	0.06	<1	0.06	<1	0.10
R526 West	<1	0.01	<1	0.15	<1	0.06	<1	0.18

Table 2.7 Construction PM Peak Hours Junction Capacity Assessment *(in PCUs)*

Junction Approach	(17:00 - 18:00)				(18:00 - 19:00)			
	Base		Base with Re-Routing		Base		Base with Re-Routing	
	MMQ	RFC	MMQ	RFC	MMQ	RFC	MMQ	RFC
R526 Roundabout								
R526 North	1	0.43	1	0.43	1	0.23	1	0.24
R526 East	1	0.20	1	0.20	<1	0.12	1	0.14
R526 South	1	0.27	1	0.28	<1	0.23	<1	0.22
M20 northbound off slip/ R526 Priority Junction								
R526 East	<1	0.07	<1	0.19	<1	0.07	<1	0.27
M20 Off-Slip	<1	0.10	<1	0.10	<1	0.08	<1	0.08
M20 southbound off slip/ L1407 Roundabout								
M20 Off-Slip	<1	0.27	<1	0.29	<1	0.14	<1	0.15
L1407	<1	0.12	1	0.27	<1	0.10	1	0.33
R526 West	<1	0.12	<1	0.15	<1	0.07	<1	0.09

Tables above show that the three junctions assessed are predicted to operate within capacity, during the construction peak activity year peak arrival and departure peak periods, with the relocation of 500 construction to Limerick Racecourse.

2.5.2 Construction Phase Sensitivity Scenario Assessment

Table 2.8 shows the junction capacity assessment during construction AM peak arrivals at 07:45 to 08:45 and PM peak departures at 16:30 to 17:30.

Table 2.8 Road Network AM and PM Peaks Junction Operational Capacity Results *(in PCUs)*

Junction Approach	AM Peak (07:45 – 08:45)				PM Peak (16:30 – 17:30)			
	Base		Base with Re-Routing		Base		Base with Re-Routing	
	MMQ	RFC	MMQ	RFC	MMQ	RFC	MMQ	RFC
R526 Roundabout								
R526 North	1	0.18	1	0.30	1	0.40	1	0.42
R526 East	<1	0.11	<1	0.13	1	0.23	1	0.26
R526 South	2	0.53	2	0.61	1	0.28	1	0.31
M20 northbound off slip/ R526 Priority Junction								
R526 East	<1	0.07	<1	0.10	<1	0.05	2	0.64
M20 Off-Slip	<1	0.19	<1	0.27	<1	0.08	<1	0.13
M20 southbound off slip/ L1407 Roundabout								
M20 Off-Slip	<1	0.09	1	0.35	1	0.30	<1	0.32
L1407	<1	0.09	<1	0.15	<1	0.11	5	0.81
R526 West	<1	0.08	1	0.35	<1	0.15	<1	0.19

The junction modelling results in the above table show that two junctions (i.e. R526 Roundabout and M20 off slip/ R526 priority junction) assessed are predicted to operate within capacity with the relocation of 500 construction car parking spaces from Eli Lilly site to Limerick Racecourse during the Construction Stage AM and PM peaks.

The junction modelling results at the M20 southbound off slip/ L1407 Roundabout shows a MMQ of 5 PCUs (i.e. 30m in length) and an RFC of 0.81 on the L1407, indicating that the L1407 approach would operate close to capacity with a maximum queue of five PCUs, should all construction staff cars depart the Limerick Racecourse during the network PM peak hour. However, this is considered a reasonable worst-case scenario and in reality, there would be a spread of construction staff leaving the Limerick Racecourse car parking.

3. Conclusions

This Technical Note sets out the effects of temporary relocation of 500 construction car parking spaces from the existing Eli Lilly site (construction compound) to Limerick Racecourse during the ongoing permitted Phase 2 construction activities on the M20 Interchanges (Junction 3 and Junction 4) and surrounding road network.

The relocation of construction car park to Limerick Racecourse would results in reassignment of construction phase traffic to M20 Interchange (Junction 4) and would decrease the number of staff cars travelling through the Ballycummin Roundabouts and M20 Interchange (Junction 3).

The junction assessment results show that relocating 500 construction car park spaces would have a minimal impact on operation of the three junctions of the M20 Interchange (Junction 4) during the construction AM and PM peak arrivals and departures periods. In addition, a further sensitivity test with all the 500 construction staff cars arriving and departing during the road network AM and PM peak hours respectively show all three junctions of the M20 Interchange (Junction 4) will continue to operate within capacity.

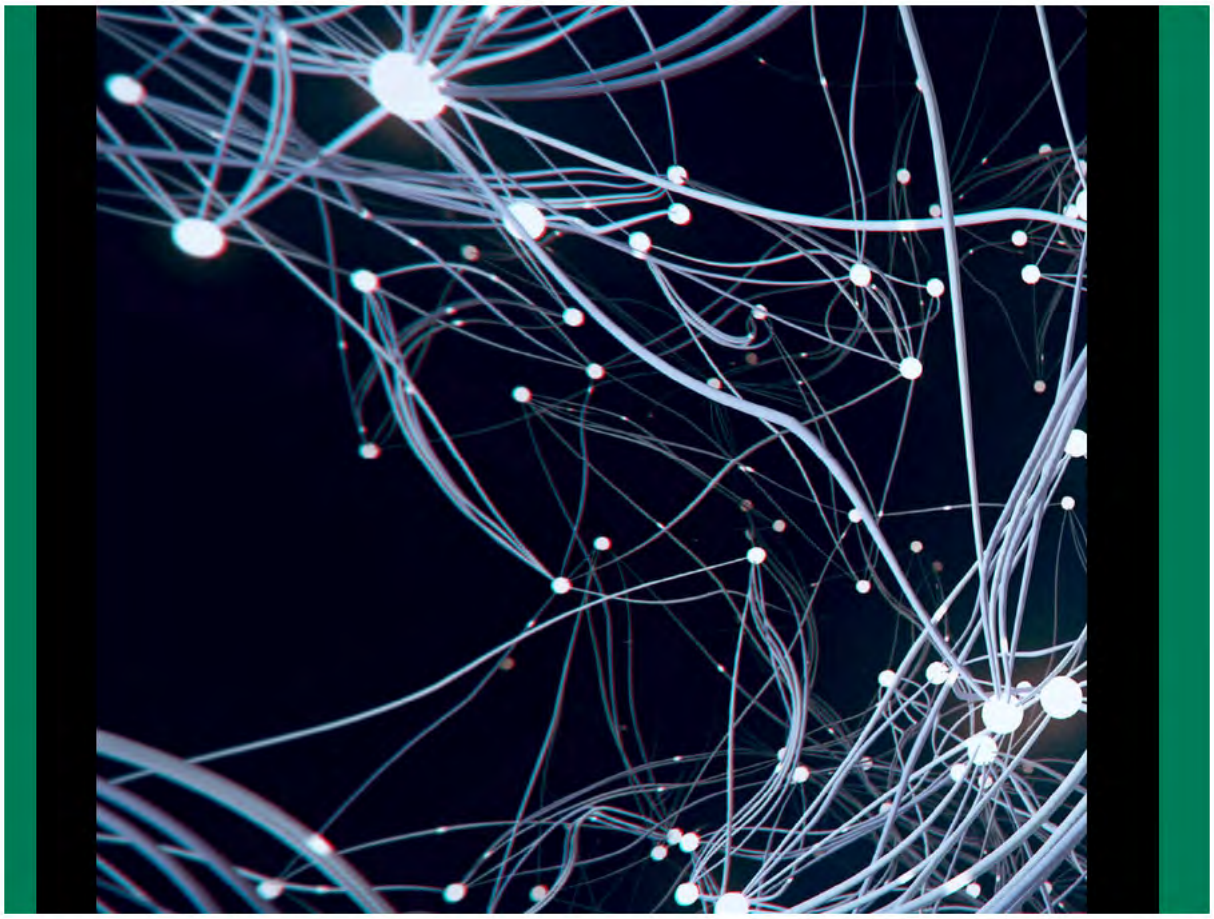
The junction capacity assessment exercise concluded that 500 temporary car parking spaces can be accommodated at the Limerick Racecourse car park with minimum impact on operational performance of junctions providing access to and from the Limerick Racecourse car park and will support in lowering the Eli Lilly Construction Stage traffic impacts at the Ballycummin Roundabout and M20 Interchange (Junction 3).

Technical Note

Document no: 01
Revision no: 01

Traffic Impacts of Relocation of Construction Stage Car Parking Spaces from Eli Lilly Construction Compound to Racecourse Limerick, County Limerick

28 October 2025
16 Feb 2026 Revised



Technical Note

Client name:	Eli Lilly		
Project name:	Traffic Impacts of Relocation of Construction Car Parking Spaces from Eli Lilly Construction Compound to Racecourse Limerick, County Limerick.		
		Project no:	79241304
Document no:	01	Project manager:	Saurabh Gupta
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Jacobs Engineering Ireland Limited

Termini Building,
2nd Floor,
3 Arkle Road, Sandyford,
D18 C9C5
Ireland

T +353 (0)1 269 5666
www.jacobs.com

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Figures

Tables

1. Introduction

Jacobs has been appointed by Eli Lilly (Kinsale) Limited to prepare a Technical Note (TN) to assess the traffic impacts of relocating of 500 Construction Stage car parking spaces from Eli Lilly campus to Limerick Racecourse during the ongoing proposed expansion within Eli Lilly Biopharmaceutical Manufacturing Campus, located at Raheen Business Park, Raheen, County Limerick.

The existing Eli Lilly campus is located within the Raheen Business Park north of Ballycummin Avenue and bounded by R526 towards the west with construction compound located within Eli Lilly campus. Limerick Racecourse is located approximately six km, southeast of Eli Lilly site on the Local Road L1407.

The Traffic Impact Assessment (TTA) prepared as part of the planning process for the proposed expansion within Eli Lilly Biopharmaceutical Manufacturing Campus (Phase -2), showed that there would be approximately 1,475 number of construction staff working at the Eli Lilly site during the peak construction activity period. Of these 1,475-construction staff, it is assumed that 15% of these construction staff are likely to travel by sustainable modes and 85% by car mode.

With the temporary relocation of 500 construction car parking spaces from Eli Lilly site to Limerick Racecourse, the equivalent construction staff cars are anticipated to drive up to the Limerick Racecourse and utilise their parking. Therefore, it is important to understand the number of construction staff arriving at the Limerick Racecourse.

Table 1.1 summarises the construction staff trip generation during the peak construction activity period based on the TTA.

Table 1.1: Construction Staff Trip Generation

Mode	Mode Share (%)	Total Construction Staff
By sustainable modes (Cycle, Walking, Shuttle bus)	15%	221
By Car	85%	1,254
Total	100%	1,475

The above table presents that 1,254-construction staff would travel to the Eli Lilly site by car mode. Assuming a car occupancy of 1.5 staff per car, it results in 836 staff cars arriving daily during the peak construction phase. With 500 construction staff cars going to park at Limerick Racecourse, the car parking for the remaining 336 construction staff cars would be provided within the existing Eli Lilly site.

Based on the assumptions considered within the TTA, using a car occupancy of 1.5 staff/car, 750 construction staff will be accessing the car parking at Limerick Racecourse. These construction staff will then be using shuttle bus to transfer to and from the Eli Lilly campus. It is envisaged that double decker shuttle buses would be provided to transfer construction staff between the Eli Lilly campus in Raheen Business Park and the Limerick Racecourse car park. It is also assumed that construction staff cars travelling to and from the Racecourse car park would continue to follow the proposed arriving and departing profile and routing, presented in the TTA.

This TN summaries the outcome of reassignment of construction phase car trips on the wider network and supporting the traffic impact analysis of routing construction traffic through the M20 Interchange (Junction 4) junctions providing access to Limerick Racecourse car park.

2. Traffic Flow Changes

The Automatic Number Plate Recognition (ANPR) survey carried out on 12th March 2024 as part of proposed expansion within Eli Lilly Biopharmaceutical Manufacturing Campus (Phase 2) Planning Application gave an understanding of the wider road cordon distribution of the ongoing construction staff cars arriving and departing at the Eli Lilly campus.

The ANPR locations are shown in **Figure 2.1** and the distribution of arriving construction staff cars at the survey locations is illustrated in **Table 2.1**.

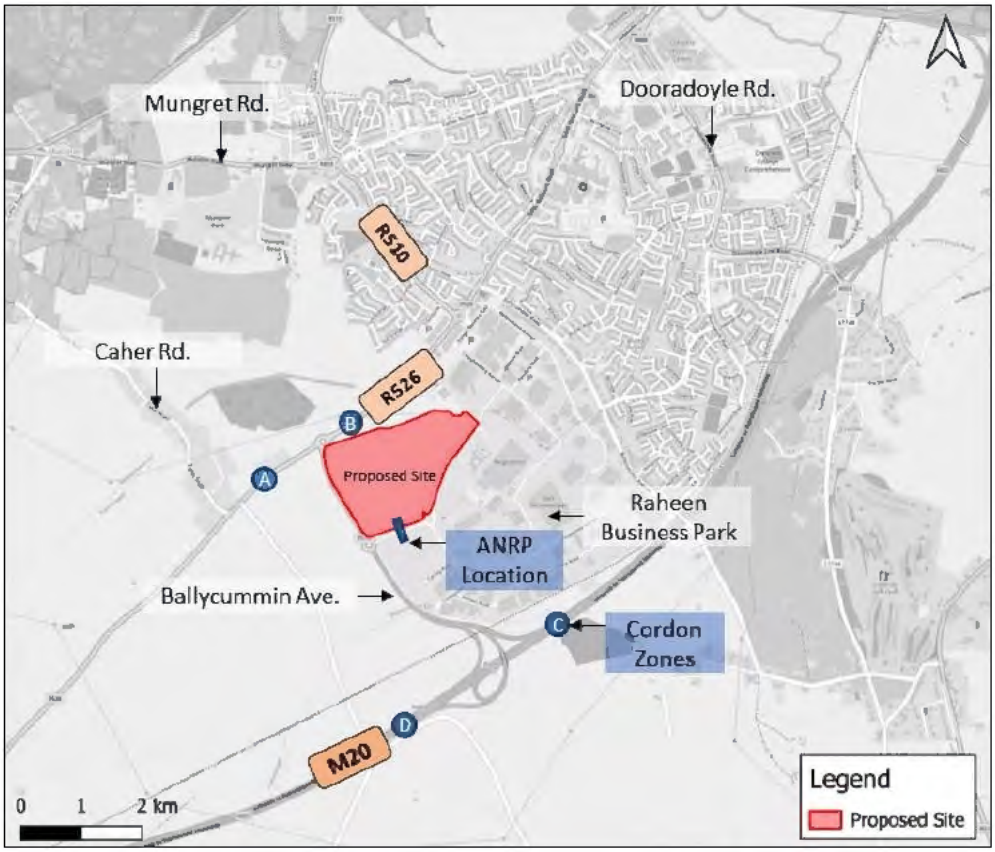

Figure 2.1: ANPR Survey Location

Table 2.1: ANPR Survey Cordon Trip Distribution

Codon Location	Arrival Distribution	Const. Staff	Equivalent Const. Staff Cars
Zone A	10%	131	87
Zone B	12%	155	103
Zone C	52%	655	437
Zone D	20%	250	167
Roches Avenue	5%	63	42
Total	100%	1,254	836

The above cordon trip distribution indicates that approximately of all the construction car trips 95% of the of all construction car trips route via Ballycummin Avenue and 5% via Roches Avenue within the Raheen Business Park.

Out of the 95% arriving via Ballycummin Avenue, 72% will approach via M20 Interchange – Junction 3 (Zone C and D), while 10% will come from Zone A (R526 Southwest) with 12% coming from Zone B (R526 Northeast).

Considering the above trip distribution and construction car trips that would be relocated to the Limerick Racecourse is presented in **Table 2.2**.

Table 2.2: Eli Lilly and Limerick Racecourse Construction Stage Car Parking Distribution

Codon Location	Total Cont. Staff Cars	Const. Staff Cars accessing Eli Lilly campus	Const. Staff Cars likely to park at Limerick Racecourse
Zone A	87	32	55
Zone B	103	38	65
Zone C	437	162	275
Zone D	167	62	105
Roches Avenue	42	42	-
Total	836	336	500

Overall, the relocation of parking spaces would significantly reduce the level of construction traffic going through the M20 Interchange Junction 3, and Loughmore and Ballycummin Roundabout, which in turn would lower the construction traffic impacts of the permitted Eli Lilly Phase 2 development at the junctions.

Shuttle Bus Transfers

The 500 construction staff cars relocated to the Racecourse car park would generate 750 staff trips that needs to be transferred to and from construction compound within the existing Eli Lilly campus.

Assuming a double decker bus with average capacity of 70 people, 11 number of buses would be needed to shuttle 750-construction staff during a typical weekday to and from Limerick Racecourse. It is proposed that the shuttle bus route would be via the R526, the R510 and Ballycummin Roundabout.

2.1 M20 Interchange (Junction 3) and surrounding Road Network

The relocation of 500 cars during the construction phase, from the existing Eli Lilly construction compound, would decrease construction car trips arriving and departing via the Ballycummin Avenue and Ballycummin Roundabout, by 120 cars from zones A and B (via R526/ R510 Loughmore Roundabout) and 380 cars arriving from zones C and D (M20 Interchange Junction 3).

Therefore, the proposed car park relocation during the Construction Stage would decrease the anticipated traffic delays and queueing at the Ballycummin Roundabout and the M20 Interchange Junction 3.

The proposed relocation of car parking would also increase around 11 shuttle buses (i.e. 22 PCUs) arriving departing via R526 between the Eli Lilly campus and Limerick Racecourse.

Table 2.3 and **Table 2.4** present a comparison between inbound traffic flows at Loughmore Roundabout and Ballycummin Roundabout during Phase 2 construction activities at existing Eli Lilly site and construction activities with the temporary relocation of construction staff parking spaces from Eli Lilly site to Limerick Racecourse.

Table 2.3 Construction AM Year Peak Arrivals percentage decrease in traffic flows *(in PCUs)*

Total Junction Inbound Flows	AM Arrivals (06:00 – 07:00)			AM Arrivals (07:00 – 08:00)		
	Base	Base + Const.	Base + Const. with Re-Routing	Base	Base + Const.	Base + Const. with Re-Routing
Loughmore Rbt	525	649 (23.5%)	642 (-1.0%)	1,219	1,304 (7.0%)	1,298 (-0.4%)
Ballycummin Rbt	884	1,397 (58.0%)	1,169 (-16.4%)	1,474	1,831 (24.2%)	1,614 (-11.8%)

Table 2.4 Construction PM Year Peak Arrivals percentage decrease in traffic flows *(in PCUs)*

Total Junction Inbound Flows	PM Arrivals (17:00 – 18:00)			PM Arrivals (18:00 – 19:00)		
	Base	Base + Const.	Base + Const. with Re-Routing	Base	Base + Const.	Base + Const. with Re-Routing
Loughmore Rbt	1,251	1,285 (2.7%)	1,294 (0.7%)	860	912 (6.0%)	914 (0.2%)
Ballycummin Rbt	1,525	1,712 (12.2%)	1,605 (-6.2%)	858	1,147 (33.7%)	985 (-14.2%)

As presented in Table 2.3 and Table 2.4, the relocation would decrease inbound traffic at Ballycummin Roundabout.

2.2 M20 Interchange (Junction 4) and surrounding Road Network

With the relocation of 500 parking spaces to Limerick Racecourse car park, traffic corresponding to 500 parking spaces will re-route via M20 Interchange (Junction 4). Therefore, following three junctions on the adjacent road network would experience increase in traffic flows:

1. R526 Roundabout
2. M20 northbound off slip/ R526 Priority Junction
3. M20 southbound off slip/ L1407 Roundabout

2.2.1 R526 Roundabout

The construction staff cars approaching the existing construction compound from Zone A (i.e. R526 south) and Zone B (R526 north) would now access the Limerick Racecourse via R526/ R526 Overbridge Roundabout.

Therefore, it is expected that 55 cars (Zone A) passing the R526 Roundabout previously would now turn right turn at the roundabout to access Limerick Racecourse. Likewise, 65 cars approaching from Zone B, would travel further south to R526 Roundabout and turn left turn at this roundabout towards the Limerick Racecourse.

In addition, there would be additional 11 shuttle buses (i.e. 22 PCUs) transferring staff to and from Limerick Racecourse routing via the R526 Roundabout.

2.2.2 M20 northbound off slip/ R526 Priority Junction

It is expected that 120 cars (Zone A and B) would now access R526 Overbridge towards the Limerick Racecourse. And 105 cars (Zone D) would access Limerick Racecourse utilising the M20 northbound off slip road. In addition, there would be additional 11 shuttle buses (i.e. 22 PCUs) transferring staff to and from Limerick Racecourse routing via theR526 Roundabout.

2.2.3 R526/ M20 southbound off slip/ L1407 Roundabout

The reassignment of construction traffic indicates that 275 cars arriving at Eli Lilly site from the M20 northeast (Zone C) would continue travelling south exiting at Junction 4 to access the L1407 using M20 Junction 4 southbound off slip. Similarly, 105 staff cars approaching from M20 south (Zone D) would access L1407 using the Junction 4 northbound off slip.

In total, around 380 construction staff cars are likely to arrive via M20 Interchange (Junction 4) off slips to access Limerick Racecourse.

In addition, R526/ L1407 Roundabout would also experience additional 120 cars arriving from the R526/ R526 Roundabout. Further, 11 shuttle buses (22 PCUs) transferring construction staff between Limerick Racecourse and Eli Lilly campus will also be using the R526/ L1407 Roundabout.

With the expected increase in traffic flows during the morning and evening peak hours, operational performance of the above three junctions of the M20 Interchange 'with' and 'without' the construction traffic, has been carried out and discussed in the next section of this TN.

2.3 Existing Traffic Flow Characteristics

To assess the impact of the temporary relocation of 500 construction car parking spaces from Eli Lilly site to Limerick Racecourse on the surrounding road network, a 24-hour classified Junction Turning Counts (JTCs), and queue length surveys were carried out at the three junctions identified above. The traffic surveys were undertaken on Thursday, 22nd May 2025.

In addition, to understand the weekday variation in traffic flow at the M20 Interchange (Junction 4) a 24-hours seven-day Automatic Traffic Counts (ATC) were also carried out from Thursday 22nd May to Wednesday 28th May 2005.

The traffic count locations are presented in Figure 2.2.

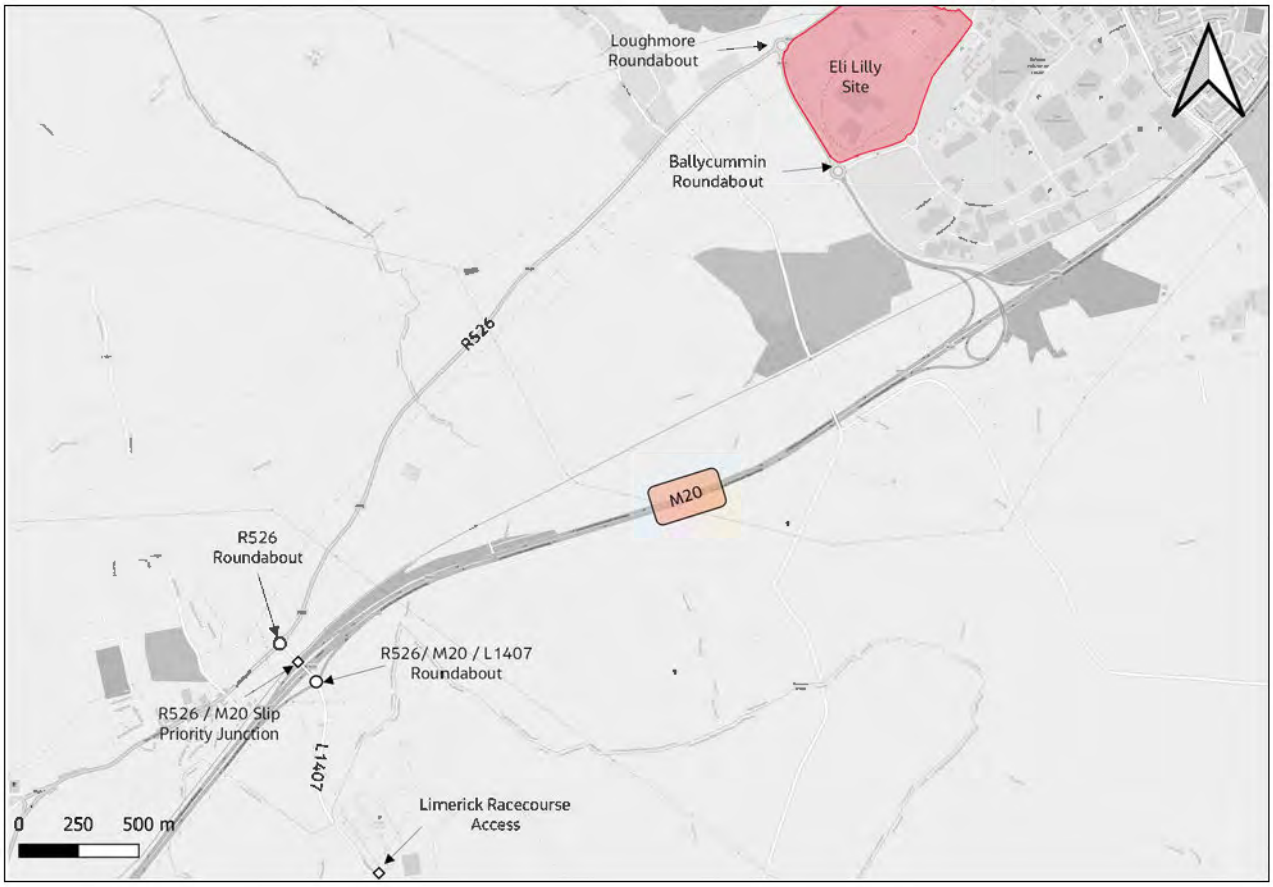

Figure 2.2 Traffic Survey Locations

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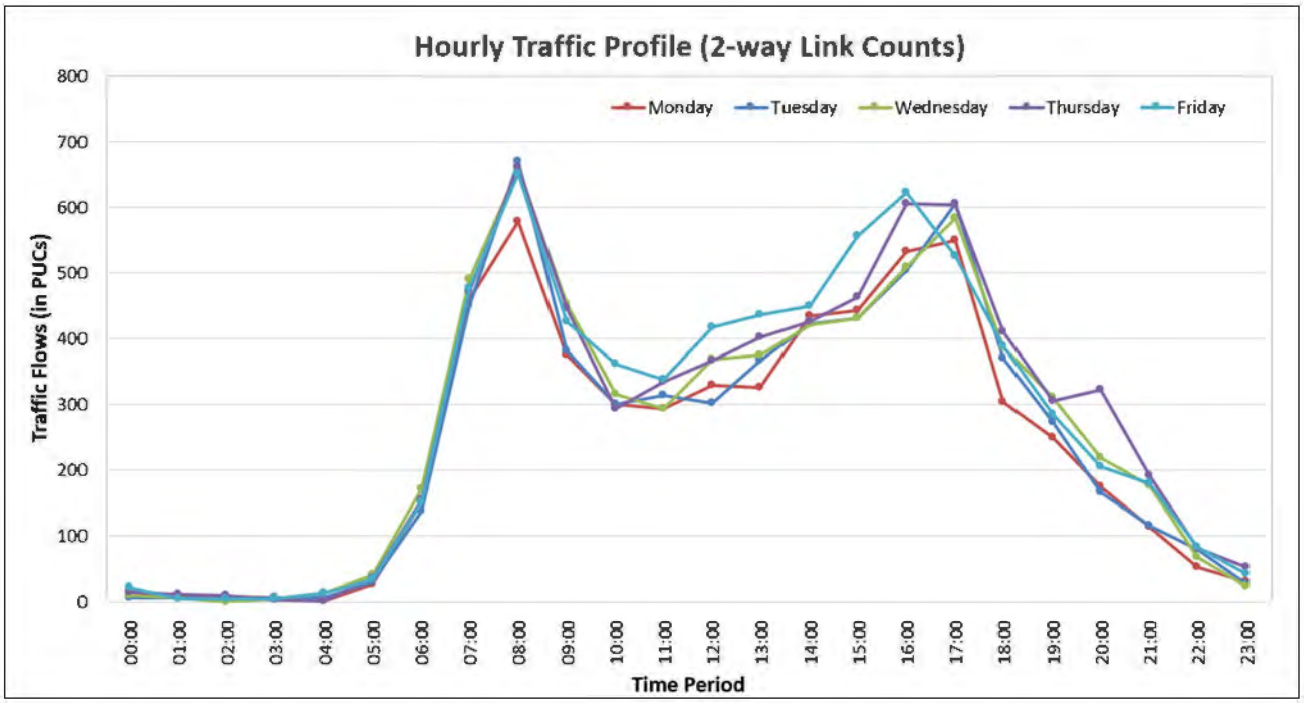

Figure 2.3 Hourly Traffic Profile on R526 (over the M50 Interchange Bridge, Junction 4)

Figure 2.4 presents the hourly traffic profile from the three junctions turning counts throughout the day.

It should be noted that each 15-minute time segment presented corresponds to one-hour traffic flows to determine the peak time within a peak hour. The observed traffic counts for the three junctions in the study area show that the road network peaks follow a typical commuter travel peak trend. The AM peak hour occurs between 07:45 to 08:45 in the morning and the PM peak hour occurs from 16:30 to 17:30 in the evening.

The road network peak hours were the same hours observed during the traffic surveys carried out on 12th March 2024 as part of the Phase 2 Planning Application presented in the TTA.

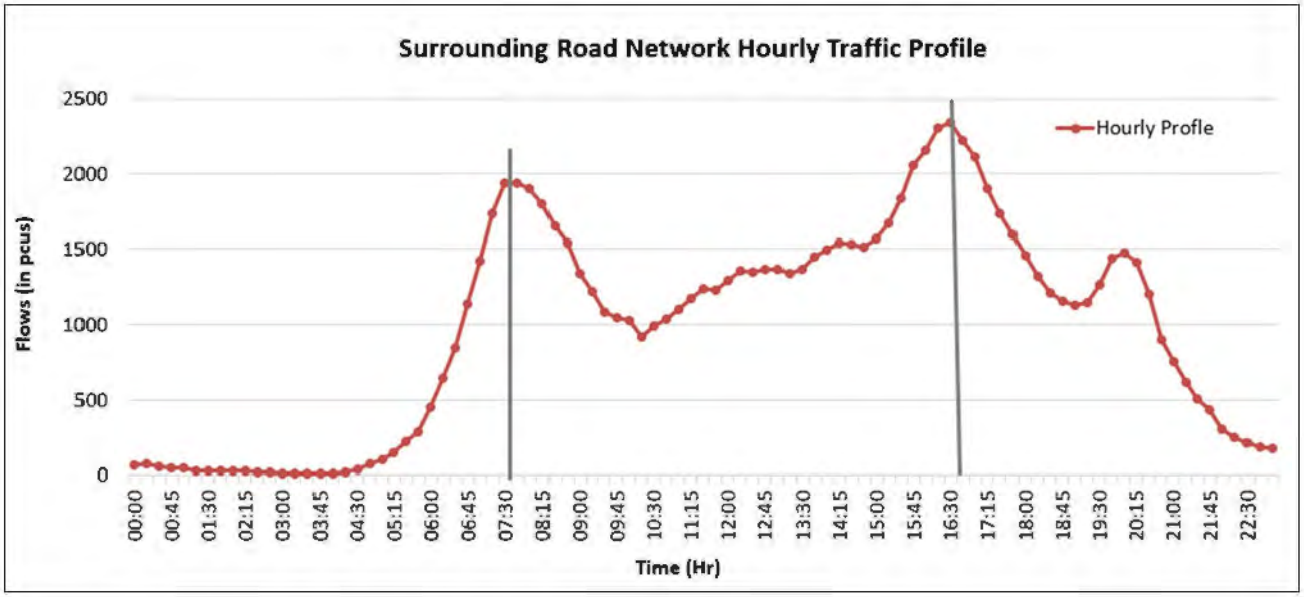

Figure 2.4 Surrounding Road Network Hourly Traffic Profile

2.4 Traffic Assessment Scenarios

The following scenarios have been assessed for the traffic flow assessment and junction operational performance and are based on the peak construction arrival and departure periods as presented in the TTA.

- Construction peak activity year AM peak arrivals
    1. 06:00 to 07:00; and
    2. 07:00 to 08:00;

- Construction peak activity year PM peak departures
    1. 17:00 to 18:00; and
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In addition, a sensitivity scenario is also assessed considering if all the construction staff cars corresponding to 500 car parking spaces arrive during the road network peak hour.

- Road Network AM Peak Hour (07:45 – 08:45); and
- Road Network PM Peak Hour (16:30 – 17:30);

It should be noted that the traffic assessment considers all the known permitted developments (as presented in the TTA) plus re-routing of 500 construction staff cars plus remaining construction staff cars arriving and departing the Eli Lilly site to understand the percentage increase in traffic flows due to the temporary relocation to Limerick Racecourse during the construction phase of the Proposed Development.

Table 2.5 summarises the percentage increase in the flows at the key junctions between the 'base' and 'base with Racecourse' scenarios for the Construction Year.

Table 2.5 Construction Year Peak Arrivals percentage increase in traffic flows *(in PCUs)*

Total Junction Inbound Flows	AM Arrivals (06:00 – 07:00)		AM Arrivals (07:00 – 08:00)		PM Arrivals (17:00 – 18:00)		PM Arrivals (18:00 – 19:00)	
	Base	Base with Re-Routing	Base	Base with Re-Routing	Base	Base with Re-Routing	Base	Base with Re-Routing
R526 Roundabout	258	392 (52.3%)	758	872 (15.1%)	1,002	1,059 (5.6%)	675	748 (10.8%)
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The re-routing predicts that there will be an increase in traffic flows of more than 10% in the AM peak periods. However, the increase in percentage terms looks significant but it is largely due to the low number of traffic flows at these junctions in the base scenario.

Considering that the junctions show an increase in traffic flows of more than 10%, a detailed junction capacity analysis is carried out at these junctions and discussed in the next section.

2.5 Junction Capacity Analysis

Junction capacity analysis has been carried out using Junction 10 for the assessment of priority-controlled and roundabout junctions using the 'Lane Simulation' (advanced modelling feature), which allows lane utilisation on roundabout approaches to be realistically modelled and simulated in accordance with the existing lane markings. This approach has been taken to ensure that the junction models reflect existing operational performance of the junctions.

Junction performance results have been summarised as Ratio of Flow to Capacity (RFC) and Average Mean Maximum Queue (MMQ), that is the total number of vehicles in queue, for all lanes on the approach arm expressed in PCU values. An RFC value of 0.85 is generally regarded as the practical limit for approach roads at a junction. Junctions operating below this threshold should operate efficiently and within capacity.

The base network peak operational performance of the three junctions has been assessed to evaluate that the junction model reflects performance relative to observed queue.

2.5.1 Peak Construction Stage Assessment

Table 2.6 shows the junction capacity assessment during construction AM peak arrivals at 06:00 to 07:00 and 07:00 to 08:00 and Table 2.7 shows the capacity assessment during construction PM peak departures at 17:00 to 18:00 and 18:00 to 19:00.

Table 2.6 Construction AM Peak Hours Junction Capacity Assessment *(in PCUs)*

Junction Approach	(06:00 - 07:00)				(07:00 - 08:00)			
	Base		Base with Re-Routing		Base		Base with Re-Routing	
	MMQ	RFC	MMQ	RFC	MMQ	RFC	MMQ	RFC
R526 Roundabout								
R526 North	< 1	0.04	<1	0.08	<1	0.12	<1	0.16
R526 East	<1	0.04	<1	0.05	<1	0.11	<1	0.12
R526 South	<1	0.14	<1	0.19	1	0.39	1	0.45
M20 northbound off slip/ R526 Priority Junction								
R526 East	<1	0.01	<1	0.02	<1	0.03	<1	0.04
M20 Off-Slip	<1	0.05	<1	0.07	<1	0.20	<1	0.22
M20 southbound off slip/ L1407 Roundabout								
M20 Off-Slip	<1	0.03	<1	0.14	<1	0.06	<1	0.17
L1407	<1	0.03	<1	0.06	<1	0.06	<1	0.10
R526 West	<1	0.01	<1	0.15	<1	0.06	<1	0.18

Table 2.7 Construction PM Peak Hours Junction Capacity Assessment *(in PCUs)*

Junction Approach	(17:00 - 18:00)				(18:00 - 19:00)			
	Base		Base with Re-Routing		Base		Base with Re-Routing	
	MMQ	RFC	MMQ	RFC	MMQ	RFC	MMQ	RFC
R526 Roundabout								
R526 North	1	0.43	1	0.43	1	0.23	1	0.24
R526 East	1	0.20	1	0.20	<1	0.12	1	0.14
R526 South	1	0.27	1	0.28	<1	0.23	<1	0.22
M20 northbound off slip/ R526 Priority Junction								
R526 East	<1	0.07	<1	0.19	<1	0.07	<1	0.27
M20 Off-Slip	<1	0.10	<1	0.10	<1	0.08	<1	0.08
M20 southbound off slip/ L1407 Roundabout								
M20 Off-Slip	<1	0.27	<1	0.29	<1	0.14	<1	0.15
L1407	<1	0.12	1	0.27	<1	0.10	1	0.33
R526 West	<1	0.12	<1	0.15	<1	0.07	<1	0.09

Tables above show that the three junctions assessed are predicted to operate within capacity, during the construction peak activity year peak arrival and departure peak periods, with the relocation of 500 construction to Limerick Racecourse.

2.5.2 Construction Phase Sensitivity Scenario Assessment

Table 2.8 shows the junction capacity assessment during construction AM peak arrivals at 07:45 to 08:45 and PM peak departures at 16:30 to 17:30.

Table 2.8 Road Network AM and PM Peaks Junction Operational Capacity Results *(in PCUs)*

Junction Approach	AM Peak (07:45 – 08:45)				PM Peak (16:30 – 17:30)			
	Base		Base with Re-Routing		Base		Base with Re-Routing	
	MMQ	RFC	MMQ	RFC	MMQ	RFC	MMQ	RFC
R526 Roundabout								
R526 North	1	0.18	1	0.30	1	0.40	1	0.42
R526 East	<1	0.11	<1	0.13	1	0.23	1	0.26
R526 South	2	0.53	2	0.61	1	0.28	1	0.31
M20 northbound off slip/ R526 Priority Junction								
R526 East	<1	0.07	<1	0.10	<1	0.05	2	0.64
M20 Off-Slip	<1	0.19	<1	0.27	<1	0.08	<1	0.13
M20 southbound off slip/ L1407 Roundabout								
M20 Off-Slip	<1	0.09	1	0.35	1	0.30	<1	0.32
L1407	<1	0.09	<1	0.15	<1	0.11	5	0.81
R526 West	<1	0.08	1	0.35	<1	0.15	<1	0.19

The junction modelling results in the above table show that two junctions (i.e. R526 Roundabout and M20 off slip/ R526 priority junction) assessed are predicted to operate within capacity with the relocation of 500 construction car parking spaces from Eli Lilly site to Limerick Racecourse during the Construction Stage AM and PM peaks.

The junction modelling results at the M20 southbound off slip/ L1407 Roundabout shows a MMQ of 5 PCUs (i.e. 30m in length) and an RFC of 0.81 on the L1407, indicating that the L1407 approach would operate close to capacity with a maximum queue of five PCUs, should all construction staff cars depart the Limerick Racecourse during the network PM peak hour. However, this is considered a reasonable worst-case scenario and in reality, there would be a spread of construction staff leaving the Limerick Racecourse car parking.

3. Conclusions

This Technical Note sets out the effects of temporary relocation of 500 construction car parking spaces from the existing Eli Lilly site (construction compound) to Limerick Racecourse during the ongoing permitted Phase 2 construction activities on the M20 Interchanges (Junction 3 and Junction 4) and surrounding road network.

The relocation of construction car park to Limerick Racecourse would results in reassignment of construction phase traffic to M20 Interchange (Junction 4) and would decrease the number of staff cars travelling through the Ballycummin Roundabouts and M20 Interchange (Junction 3).

The junction assessment results show that relocating 500 construction car park spaces would have a minimal impact on operation of the three junctions of the M20 Interchange (Junction 4) during the construction AM and PM peak arrivals and departures periods. In addition, a further sensitivity test with all the 500 construction staff cars arriving and departing during the road network AM and PM peak hours respectively show all three junctions of the M20 Interchange (Junction 4) will continue to operate within capacity.

The junction capacity assessment exercise concluded that 500 temporary car parking spaces can be accommodated at the Limerick Racecourse car park with minimum impact on operational performance of junctions providing access to and from the Limerick Racecourse car park and will support in lowering the Eli Lilly Construction Stage traffic impacts at the Ballycummin Roundabout and M20 Interchange (Junction 3).

Addendum 16 Feb 2026

In relation to the use of Limerick Racecourse for 'Limerick Student Race Day' on April 16th 2026. Eli Lilly will work closely with Limerick Racecourse to ensure that traffic on the day is properly managed so that there are no concurrent arrivals or departures of construction workers using the car park, with students attending the Student Race Day.

NORTH

LEGEND

PROPOSED AREA FOR TEMPORARY CAR PARKING

EXTENT OF APPLICANTS LANDHOLDING

REV	DATE	GRID	DESCRIPTION	BY	CHK	REV'D	APP
A	09/01/26		ISSUED FOR INFORMATION	LG	RB	RB	ST

Jacobs
Tiernani Building, 2nd Floor
3 Arkle Road
Sandyford
Dublin
Co. Dublin
D18 C9C5

CLIENT

Lilly

PROJECT

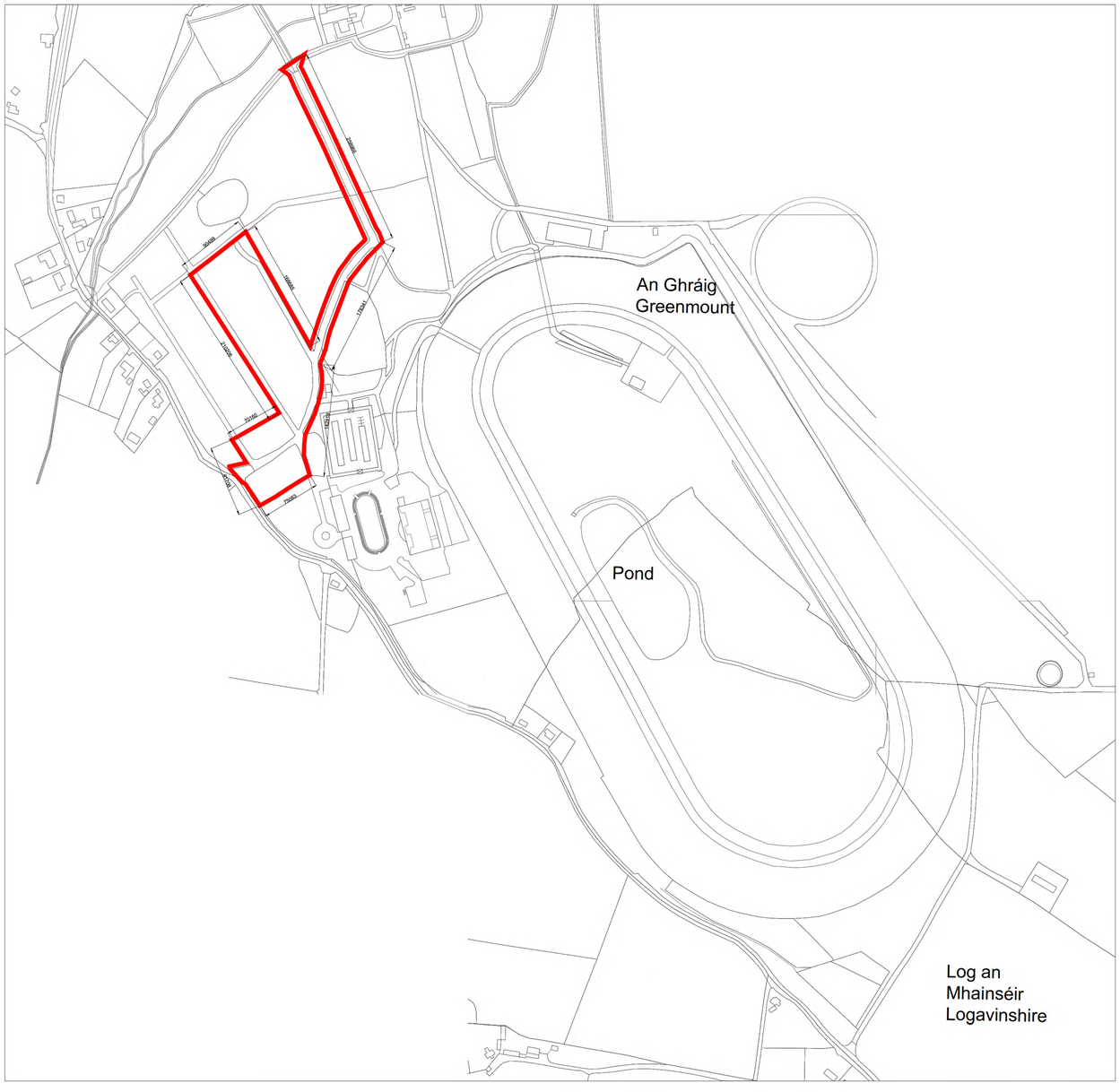
LILLY RAHEEN LIMERICK EXPANSION

CONTEXTUAL AERIAL PHOTOGRAPH

SCALE 1:10,000

PROPOSED ALTERNATIVE PARKING LOCATION
AT LIMERICK RACECOURSE
CONTEXTUAL AERIAL PHOTOGRAPH

SCALE	DRAWING NUMBER	REV
1:10,000	25-LI-PE-00001	A



PROPOSED SITE LOCATION PLAN

SCALE 1:2,500

NORTH

LEGEND

PROPOSED AREA FOR TEMPORARY CAR PARKING

EXTENT OF APPLICANTS LANDHOLDING

REV	DATE	GRID	DESCRIPTION	BY	CHK	REV'D	APP
A	09/01/26		ISSUED FOR INFORMATION	LG	RB	RB	ST

Jacobs
Termini Building, 2nd Floor
3 Arkle Road
Sandyford
Dublin
Co. Dublin
D18 C9C5

CLIENT

Lilly

PROJECT

LILLY RAHEEN LIMERICK EXPANSION

PROPOSED ALTERNATIVE PARKING LOCATION
AT LIMERICK RACECOURSE
PROPOSED SITE LOCATION PLAN

SCALE	DRAWING NUMBER	REV
1:2,500	25-LI-PE-00002	A

Entrance to be used

NORTH

258986

90499

168685

176341

210206

70160

142819

91708

75083

LEGEND

PROPOSED AREA FOR TEMPORARY CAR PARKING

EXTENT OF APPLICANTS LANDHOLDING

REV	DATE	GRID	DESCRIPTION	BY	CHK	REV'D	APP
A	09/01/26		ISSUED FOR INFORMATION	LG	RB	RB	ST

Jacobs

Termini Building, 2nd Floor
3 Arkle Road
Sandyford
Dublin
Co. Dublin
D18 C9C5

CLIENT

Lilly

PROJECT

LILLY RAHEEN LIMERICK EXPANSION

PROPOSED ALTERNATIVE PARKING LOCATION
AT LIMERICK RACECOURSE
PROPOSED SITE LAYOUT PLAN

SCALE	DRAWING NUMBER	REV
1:500	25-LI-PE-00003	A

PROPOSED SITE LAYOUT PLAN

SCALE 1:500

Legend

- Hedgerows to be retained
- Hedgerows to be removed.
- Stone boundary walls to be retained.
- Stone boundary walls to be removed.
- Mature trees to be retained.
- Mature trees to be removed.

PROPOSED AREA FOR TEMPORARY CAR PARKING SUBJECT TO THIS SECTION 5 APPLICATION SHOWN SHADED FOR REFERENCE.

EXISTING ENTRANCE REMOVED

EMERGENCY ENTRANCE
GATES WILL BE LOCKED AT ALL OTHER TIMES
SEE DRAWING 3466-247

PROPOSED RACETRACK

4m WIDE TRACK ACCESS

PUBLIC CAR PARKING
3000 SPACES

HARDCORE ROADS

ENTRANCE 1
PUBLIC ENTRANCE
SEE DRAWING 3466-247

TIMBER FENCING

HATCHED AREA
DESIGNATED FOR ADDITIONAL CAR PARKING
IF REQUIRED AT A LATER DATE APPROX 500 SPACES.

ENTRANCE TO BE USED

Tennis Ground

Great Mount

SCOUT CAMPING

HORSE BOX PARKING FOR SPACES

PRIVATE DWELLING HOUSES

TUNNEL

FINISH LINE

TO PATRICKSWELL

LIMERICK COUNTY COUNCIL
23 FEB 1999
PLANNING

PLEASE NOTE THAT THIS IS A REFERENCE LAYOUT ONLY,
TAKEN FROM PREVIOUS PLANNING APPLICATION REG. REF. 981077.
PROPOSED CAR PARKING AREA OVERLAID FOR INFORMATION PURPOSES ONLY

NOTE
THIS DWG. SUPERCEDES ALL PREVIOUS DWGS. REVISIONS
THIS DWG. MUST BE READ IN CONJUNCTION WITH ALL RELEVANT OTHER CONSULTANTS DWG.s.

REV	DESCRIPTION	DATE	REV	DESCRIPTION	DATE

STATUS : PLANNING PERMISSION

NEWENHAM MULLIGAN & ASSOCIATES	Job PROPOSED RACECOURSE, PATRICKSWELL, Co. LIMERICK.	date	NOV'98
	client LIMERICK RACE COMPANY PLC.	drawn	
		scale	1\2000
		checked	
ARCHITECTS 3 STEAMBOAT QUAY, LIMERICK •TELEPHONE 061 31 44 64 •FACSIMILE 061 31 44 56 N M A	description EXISTING FEATURES TO BE RETAINED	job no.	3466
		drawing no.	200/2
		rev	

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-009-26
Applicant	Eli Lily Limerick
Location	Limerick Racecourse, Greenmount Park, Patrickswell, Co. Limerick, V94 K858

1.0 Description of Site and Surroundings:

The subject site is located less than a 1km from Patrickswell village in the Limerick Racecourse site at Greenmount Park east of the M20 road. The question concerns the use of the existing carpark as a temporary facility for those working on the Eli Lilly Site. The applicants are proposing to use the main entrance to the Racecourse, northeast of the car parking area.

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:

- The temporary use of 500 no. car parking spaces at Limerick Racecourse (previously permitted under reg. ref. 98/1077) in lieu of 500no. temporary construction related car parking spaces at the Eli Lilly site in Raheen Business Park, Ballycummin (previously permitted under reg. ref. 24/01666).

This Section 5 declaration includes the following:

- Application Form
- Site location map
- AA Screening Report
- EIA Screening Report
- Traffic Impact Assessment Technical Note

3.0 Planning History:

98/1077 – Conditional permission granted for Erection of terraced stand with four floors incorporating bar/dining, kitchen & toilets. Entry building with bar & toilets. Stables, saddeling building.

3.1 Enforcement History
None

4.0 Relevant An Bord Pleanála referrals

None

5.0 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'.

As outlined in the planning history section of the report the application site has planning permission 98/1077 in place for a racecourse and car parking for up to 3,000 car parking spaces. It is noted that the car parking spaces were not constructed or formally laid out but the pathways were and car parking does take place there on race days.

The proposed area is currently grassed and accessed from hardcore access strips. It is noted that the AA screening indicates that the works will involve placing interlocking HDPE plastic mats over the existing ground surface and provision of temporary lighting, signage and bus shelters. The car parking will be operational from February 2026 to August 2027 and car park lights will be switched off at 6pm. A shuttle bus service will operate from the racecourse to the construction site, departing every ten minutes during peak arrival periods to transport construction staff to and from the site.

The proposal would allow for temporary parking of construction staff that currently park within the Raheen Business Park. The applicant has provided a Technical Note that has considered the potential traffic impacts of the proposal on the surrounding road network. The report has analysed the impacts on Junctions 3 and 4 of the M20 and surrounding road network with a traffic assessment scenario, and junction capacity analysis. The report has concluded that the relocation of construction car park to Limerick Racecourse would result in the reassignment of construction phase traffic to the M20 Interchange (Junction 4) and would decrease the number of staff cars travelling through the Ballycummin Roundabouts and M20 Interchange (Junction 3). The report outlines that this would have

a minimal impact on the operation of the three junctions of the M20 Interchange (Junction 4) during the construction AM and PM peak arrivals and departures periods. The report also states that a further sensitivity test with all the 500 construction staff cars arriving and departing during the road network AM and PM peak hours respectively show that all three junctions of the M20 Interchange (Junction 4) will continue to operate within capacity. Roads have reviewed this document and are satisfied that there would be no significant impact on the surrounding road network.

The applicant has also provided a note to state that they will have traffic management in place on the student race day with staff and patrons arriving/leaving at different times.

Based on the above it is considered that there are no additional planning considerations that need to be taken into account.

Given the site has the benefit of planning permission for use as a car park and the works only include for the placement of plastic mats, the lighting proposed is temporary and will be switched off at 6pm daily the proposal is not considered to be material change of use and therefore is not considered development.

6.0 Article 9 Restrictions

In this instance Article 9 does not apply having regard to Article 6 as the proposal does not fall within Part 1-4 of Schedule 2 of the Planning and Development Regulations and concerns whether a material change of use has or has not taken place.

7. 0 Appropriate Assessment

Having regard to the nature and scale of the proposed development and the absence of proximity or connectivity to a Natura 2000 European Site, no Appropriate Assessment issues arise and it is not considered that the proposed development would be likely to have a significant effect individually or in combination with other plans or projects, on a European Site. An appropriate assessment screening report and determination is attached to this report.

8.0 Environmental Impact Assessment

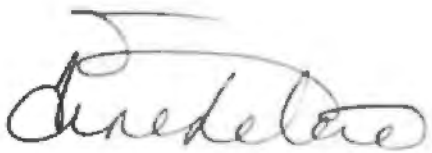
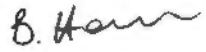
Having regard to the nature of the proposal that being the use of an existing car park and to the criteria set out in Schedule 7 of the Regulations it has been concluded at preliminary examination that there is no real likelihood of significant effects on the environment arising from the proposed development. EIA, therefore, is not required.

9.0 Conclusion/Recommendation

Regard has been had to –

(a) Section 2, 3 and 4 of the Planning and Development Act 2000 (as amended)
(b) Article 9 of the Planning and Development Regulations as amended
(c) Comments from Roads Department
(d) The plans & particulars submitted with the application received on the 22nd January 2026

It is therefore considered that the said works are not development under Section 2, 3 and 4 of the Planning and Development Act 2000 (as amended).

Executive Planner	**Áine Leland**	**Date: 13/02/2026**
Signature:		
A/Senior Planner	**Barry Henn**	**18/02/2026**
Signature:		

Appendix 1: AA PN01 Screening Form

STEP 1: Description of the project/proposal and local site characteristics:	
(a) **File Reference No:**	EC-009-26
(b) **Brief description of the project or plan:**	The temporary use of 500 car parking spaces at Limerick Racecourse in lieu of 500no. temporary construction related car parking spaces at the Eli Lilly site in Raheen Business Park is development or exempted development.
(c) **Brief description of site characteristics:**	Existing car park associated with the Limerick racecourse in Patrickswell
(d) **Relevant prescribed bodies consulted:** **e.g. DHLGH (NPWS), EPA, OPW**	N/A
(e) **Response to consultation:**	N/A

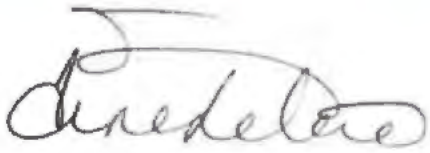
STEP 2: Identification of relevant Natura 2000 sites using Source-Pathway-Receptor model and compilation of information on Qualifying Interests and conservation objectives.				
European Site (code)	**List of Qualifying Interest/Special Conservation Interest [1]**	**Distance from proposed development [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	Approx. 5km	None	N
004077-River Shannon and River Fergus Estuaries SPA	https://www.npws.ie/protected-sites/sac/004077	Approx. 5.8km	None	N
000439 – tory Hill SAC	Tory Hill SAC | National Parks & Wildlife Service	Approx. 5km	None	N

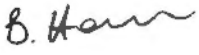
STEP 3: Assessment of Likely Significant Effects	
(a) **Identify all potential direct and indirect impacts that may have an effect on the conservation objectives of a European site, taking into account the size and scale of the project under the following headings:**	
Impacts:	**Possible Significance of Impacts: (duration/Magnitude etc)**
Construction phase e.g - Vegetation clearance - Demolition	NA, no construction works proposed

- 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	
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	NA, the use has not changed from that as a car park.
In-combination/Other	N/A given the level of development in the area.

(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	None, no works proposed

(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		
On the basis of the information submitted, which is considered adequate to undertake a screening determination and having regard to: • the nature and scale of the proposal • the intervening land uses and distance from European sites, • the lack of direct connections with regard to the Source-Pathway-Receptor model, it is concluded that the proposed development, individually or in-combination with other plans or projects, would not be likely to have a significant effect on the above listed European sites or any other European site, in view of the said sites' conservation objectives.		
Conclusion: An appropriate assessment is not required.		
	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:	 13/02/2026	

Signature and Date of the Decision Maker:	 13/02/2026

Appendix 2: EIA Screening

Establishing if the proposal is a *'sub-threshold development'*:	
Planning Register Reference:	EC-009-26
Development Summary:	The temporary use of 500 car parking spaces at Limerick Racecourse in lieu of 500no. temporary construction related car parking spaces at the Eli Lilly site in Raheen Business Park is development or exempted development.
Was a Screening Determination carried out under Section 176A-C?	☐ Yes. no further action required ☒ **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
☒ **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)	
☒ **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:	 13/02/2026
Signature and Date of the Decision Maker:	 13/02/2026

Appendix 4 - Site Visit Photos

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:

Eli Lily Limerick,
c/o Jaccobs Engineering Ireland Limited,
Floor 2,
Termini Building,
3 Arkle Road,
Sandyford Business Park,
Dublin 18.

EC/009/26 18 February 2026

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

LIMERICK CITY & COUNTY COUNCIL

APPROVED OFFICER'S ORDER

SECTION 5 – DECLARATION ON DEVELOPMENT AND EXEMPTED DEVELOPMENT

No. AOO/DC/2026/171

File Ref No. EC/009/26

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

RE: **A temporary use of 500 no. car parking spaces at Limerick Racecourse, Greenmount Park, Patrickswell, Co. Limerick.**

ORDER: Whereas by Director General's Order No. DG/2025/205 dated 24th November 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 Barry Henn, A/Senior Planner the functions as defined in the Local Government Acts, 1925 to 2024.

Now therefore pursuant to the delegation of the functions aforesaid, I, Barry Henn, A/Senior Planner, having considered the report and recommendation of Áine Leland, Executive Planner dated 13/02/2026, hereby order that a Declaration under Section 5 of the Planning and Development Act 2000 (as amended) be issued to Eli Lily Limerick, c/o Jaccobs Engineering Ireland Limited, Floor 2, Termini Building, 3 Arkle Road, Sandyford Business Park, Dublin 18 to state that the works as described above is

NOT Development and is Exempt Development.

Signed B. Henn

A/SENIOR PLANNER, PLANNING & PLACE-MAKING

Date 18/02/2026

Certified to be a true copy of Approved Officer's Order, Planning & Development Order No. AOO/DC/2026/171 dated 18/02/2026, pursuant to Section 151(7) of the Local Government Act 2001

Signed: B. Henn

A/SENIOR PLANNER, PLANNING & PLACE-MAKING

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

SECTION 5 – DECLARATION ON DEVELOPMENT AND EXEMPTED DEVELOPMENT

DECLARATION NO. **EC/009/26**

Name and Address of Applicant: Eli Lily Limerick, Raheen Business Park, Ballycummin, County Limerick.

Agent: Jacobs Engineering Ireland Limited, Floor 2, Termini Building, 3 Arkle Road, Sandyford Business Park, Dublin 18.

Whether the temporary use of 500 no. car parking spaces at Limerick Racecourse, Greenmount Park, Patrickswell, Co. Limerick is or is not Development or is or is not Exempted Development. The works as described on the plans submitted with the application on the 22nd day of January 2026.

AND WHEREAS the Planning Authority has concluded that the temporary use of 500 no. car parking spaces at Limerick Racecourse, Greenmount Park, Patrickswell, Co. Limerick **DOES** come within the scope of exempted development under Section 2, 3 and 4 of the Planning and Development Act 2000 (as amended). See Report attached.

NOW THEREFORE the Planning Authority in exercise of the powers conferred on it by Section 5(2) (a) of the Planning and Development Act 2000 (as amended) hereby decides that the said development as described above is **NOT Development and is Exempt Development.**

Signed on behalf of the said Council _____

Date: 18.2.2026

NOTE: A Declaration on Development or Exemption issued by Limerick City & County Council may be referred to An Coimisiún Pleanála on payment of €220 for review within 4 weeks after the issuing of the declaration.