

# **CLEEVES RIVERSIDE QUARTER – MIXED USE DEVELOPMENT**

## **Phase II Residential and Public Realm Works**

### **ADDENDUM ENVIRONMENTAL IMPACT ASSESSMENT REPORT**

Addendum Report in Response to Further Information Request

June 2026



**HRA | PLANNING**

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## CHAPTER ONE INTRODUCTION

### 1.1 INTRODUCTION

On behalf of the applicant, Limerick City & County Council in partnership with Limerick Twenty Three Strategic Development DAC (LTT) this Addendum provides a review of the Environmental Impact Assessment Report (EIAR) completed for the construction of a mixed use development that seeks the regeneration and adaptive reuse of a strategic brownfield site, as part of the Limerick City and County Council 'World Class Waterfront revitalisation and transformation project'. The review has been undertaken having regard to the further information request issued by An Comisiún Pleanála dated 25<sup>th</sup> March 2026 under Section 175(5)(a) of the Planning and Development Act 2000 as amended.

The site, known locally as 'Cleeves Riverside Quarter' comprises the former industrial mill complex ('Cleeves') situated on the northern side of the River Shannon, Limerick City and occupies the area between; Stonetown Terrace Road to the northeast; O'Callaghan Strand to the southeast; Condell Road (R527) to the southwest; and, Salesian Primary School and the 'Fernhill' residential estate to the northwest and west respectively - all situated in the townland of Farranshone More in Limerick City. The site is dissected by North Circular Road where it extends between Shelborne Road Lower and O'Callaghan Strand.

### 1.2 PURPOSE OF THE ADDENDUM ENVIRONMENTAL IMPACT ASSESSMENT REPORT

This Addendum EIAR has been prepared following a further information request issued by An Comisiún Pleanála (ACP) dated 25<sup>th</sup> March 2026 and the response made by the applicant.

Whilst the description of development has not changed and the development proposal remains as originally proposed when the application for consent was lodged, a number of issues raised by ACP in the further information request have resulted in minor changes / enhancements to the development proposal. This Addendum EIAR considers the additional information submitted by the applicant and in particular the consequences of the Bat Derogation License, which necessitates ex situ works by the applicant on other land in their ownership. Further the EIAR considers minor design revisions proposed.

Notwithstanding the further information request did not specifically require an update to the submitted EIAR, an Addendum to the EIAR is necessary to ensure the environmental analysis reflects the proposal as currently presented and to ensure the competent authority has a complete, up-to-date assessment in advance of making a determination.

### 1.3 OVERVIEW OF AMENDMENTS TO DEVELOPMENT

#### 1.3.1 Bat Derogation License

A Bat Derogation License, Derogation Number DER-BAT-2026-201, is now being submitted in support of the development proposal and in response to the further information request.

In addition to the provision of 3 no. bat houses on site; the retention of the commuting routes into and out of the site; the provision of suitable dark and vegetated foraging areas within the quarry and reservoir areas; and the replacement of the roosting habitat that will be lost throughout the site, all proposed in the original application for consent, the National Parks & Wildlife Service (NPWS) requested additional ex situ measures.

The proposed ex-situ bat house location, was selected following detailed consultations with NPWS, who suggested Clonmacken as a suitable area for the construction of an additional bat house for lesser horseshoe bats. The bat house is intended to enhance roosting opportunity in Limerick City and in proximity to suitable foraging and commuting grounds along the River Shannon. Owned by Limerick City & County Council the lands are located approximately 1.5km to the west of the Cleeves site, as detailed in Figure 1.0 below



Figure 1.0 Location of Bat House Identified by Red Star

The proposed ex situ bat house shall be delivered by Limerick City & County Council in partnership with Limerick Twenty Thirty, in advance of construction works on the Cleeves site.

Section 4(i) (b) of the Planning and Development Act 2000 (as amended) provides that development by the council of a county in its functional area, is exempted development where the project is being carried out on behalf of, or jointly or in partnership with, a local authority. Article 80(1)(k) provides a general cost threshold of €126,000, whereby such works can advance without the need for a public consultation process (Part 8). As the erection of an ex situ bat house is to be carried out by the local authority and is less than this cost threshold, its development does not need to be taken through a Part 8 process. Its construction therefore can commence at any time, with a commitment that it shall be constructed in advance of commencement of development on site.

### **1.3.2 Additional Mitigation Measures to PBSA**

Upon detailed consideration of the further information request to revise the site layout plan with specific reference to the Purpose Built Student Accommodation (PBSA), demonstrating compliance with the required minimum 16m separation distance, and having regard to other relevant design standards including daylight & sunlight, noise (from roof plant) and wind microclimatic effects along with planning policy promoting compact settlements, increased density, protection of heritage amenity and protected structures, it was considered that a revised site layout plan was not the optimal solution for this brownfield site.

Mitigation measures had already been introduced at initial design stage to prevent overlooking including angled facades, window locations offset relative to each other minimising direct lines of sight and side panels introduced so that the main window section would not be facing another.

These mitigation measures have been further reinforced in response to the further information request with translucent / obscure glazing now proposed with angled solid metal louvres. A comprehensive rationale and explanation to the design function is detailed in the attached Architectural Design Response to Planning prepared by Feilden Clegg Bradley Studios and Bucholz Mc Evoy Architects - CRQMP-BMEA-XX-XX-RP-AA-0015-P01

In addition to the detailed architectural response, an Addendum has been prepared to the Daylight, Sunlight and Overshadowing Study prepared by Integrated Environmental Solutions, focusing on Daylight Results for the Student Accommodation following additional overlooking prevention measures.

### **1.3.3 Additional Planting to Quarry Face**

Additional planting is proposed adjacent to the quarry face as requested in the further information request. In total 10 no. trees are proposed to be added along the northern boundary of the Salesians and Quarry Zones.

### **1.3.4 Traffic & Transport**

Chapter 18.0 Material Assets Traffic & Transport has been amended to correct the labelling 'error' and to remove reference to the solar farm as requested in the further information request.

### 1.3.5 Construction Parking Provision

Commensurate with the overall car parking strategy proposed for the site at operational stage, it is proposed to minimise car parking provision during construction. Cleaves is a city centre site which benefits from strong public transport accessibility and proximity to established public car parking facilities. All workers shall be encouraged to use alternative modes of travel and shall be briefed in advance of works commencing on site re car parking management and expectations. If necessary, construction workers will avail of public on or off street parking, similar to any other worker in a consolidated urban area.

Notwithstanding, it is not expected that there will be a significant temporary need for construction staff car parking during the construction period, during the initial stages of construction up to 36no. existing car parking spaces on the Shipyard site will be allocated to construction staff. This will accommodate construction staff for the enabling works, flood protection works, construction of the residential zones and public realm.

## 1.4 APPROACH TO ADDENDUM CHAPTERS

All chapters of the EIAR were reviewed and evaluated by their respective author, having regard to the further information being submitted.

Where no change arises from the further information submitted to ACP, it has been clearly documented in Table 1.0 for the purpose of the EIAR.

Where a change does arise, an Addendum EIAR Chapter has been provided with clarifications and amendments provided in green text. Further, any identified oversights have been corrected and also identified in green text. Unless explicitly stated otherwise, the green text provided either replaces, amends, or supplements relevant sections within the original EIAR submitted as part of the planning application. All other content in each chapter remains unchanged.

As can be seen from Table 1.0 a number of chapters within the original EIAR submitted to ACP on the 11<sup>th</sup> November 2025 remain unchanged. Accordingly, for a full and complete evaluation of the proposed development from an environmental perspective this Addendum EIAR should be read in conjunction with the original EIAR submitted with the application for consent.

Chapter of EIAR	Subject Area	Addendum Chapter	Overview of Change
Chapter 1.0	Introduction	Yes	Sets Context for Changes and Structure for Addendum EIAR
Chapter 2.0	Project Description	Yes	Provides correction to quantitative data associated with development proposal and provides details of ex-situ proposal comprising an off site bat house to be constructed by the applicant.
Chapter 3.0	Project Need & Spatial Planning Policy	No	

Chapter 4.0	Project Scoping & Engagement	No	
Chapter 5.0	Examination of Alternatives	No	
Chapter 6.0	Population & Human Health	Yes	Clarifies the landuse zoning associated with the proposed ex-situ bat house and corrects capacity of proposed creche
Chapter 7.0	Biodiversity	Yes	Provides detail on the ex-situ bat house, corrects errors and takes new landscaping measures into consideration in Section 7.7.2.3, Section 7.3.4, Section 7.3.5, Section 7.3.6 and Section 7.3.7
Chapter 8.0	Cultural Heritage - Archaeology	Yes	Assesses the likely potential impact arising from the es situ bat house on archaeology under Sections 8.3.1 and Section 8.4.
Chapter 9.0	Cultural Heritage - Architecture	No	
Chapter 10.0	Land, Soils & Geology		Assesses the likely potential impact arising from the es situ bat house on archaeology under Sections 10.4 and Section 10.5.2
Chapter 11.0	Water & Hydrogeology		Assesses the likely potential impact arising from the es situ bat house under Sections 11.4 and 11.5.1
Chapter 12.0	The Landscape		Assesses the likely potential impact arising from the es situ bat house and enhanced landscaping through the introduction of a new Section 12.7.4.
Chapter 13.0	Noise & Vibration	No	
Chapter 14.0	Air Quality	No	
Chapter 15.0	Climate	No	
Chapter 16.0	Microclimate – Pedestrian Wind Comfort & Distress	No	
Chapter 17.0	Microclimate – Sunlight Daylight & Shadow Analysis	Yes	Section 17.4 has been updated to provide a revised section on the 'Characteristics of the Proposed Development'.
Chapter 18.0	Material Assets - Traffic & Transport	Yes	Assesses the likely potential impact arising from the es situ bat house and the temporary on site construction parking under Sections 18.4 and Section 18.5.1. It also corrects a number of errata in the chapter in response to the further information request.
Chapter 19.0	Material Assets – Waste Management	Yes	Assesses the likely potential impact arising from the es situ bat house and clarifies the capacity of the creche under Sections 19.4, 19.5.3 and 19.5.4
Chapter 20.0	Material Assets – Utilities	No	

Chapter 21.0	Risk Management for Major Accidents /Disasters	No	
Chapter 22.0	Interaction Between Environmental Factors	No	
Chapter 23.0	Summary of Mitigation Measures	Yes	Includes additional mitigation and monitoring measures with respect to the ex situ bat house. Corrects a number of 'Error References'.

**Derogation Number  
DER-BAT-2026-xx**

**EUROPEAN COMMUNITIES (BIRDS AND NATURAL HABITATS) REGULATIONS, 2011  
(S.I. No 477 of 2011)**

**DEROGATION**

Granted under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011, hereinafter referred to as “the Habitats Regulations”.

The Minister for Housing, Local Government & Heritage, in exercise of the powers conferred on him by Regulation 54 of the Habitats Regulations hereby grants to **Martin Ryan of Limerick Twenty Thirty, The GPO Building, Gardens International, Henry Street, Limerick, County Limerick, V94 01W7** a derogation. It is stated that this derogation is issued:

- A. In the interests of public health and public safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment
- B. As there is no satisfactory alternative, and the action authorised by this derogation will not be detrimental to the maintenance of the population of **bats** referred to below at a favourable conservation status in their natural range.

This derogation authorises the following:

1. Roost disturbance
2. Actions authorised within the derogation

The derogation is issued in respect of the following **bat species**:

- **Lesser Horseshoe Bat**                      **Rhinolophus Hipposideros**
- **Soprano Pipistrelle**                      **Pipistrellus Pygmaeus**



### Terms and Conditions

1. This derogation is granted solely to allow the activities specified in connection with the works located at **Cleeves Riverside Quarter, Limerick, County Limerick** for **Martin Ryan**
2. All activities authorised by this derogation, and all equipment used in connection herewith, shall be carried out, constructed and maintained (as the case may be) so as to avoid unnecessary injury or distress to any species of **BAT**. Anything done other than in accordance with the terms of this derogation may constitute an offence
3. This derogation may be modified or revoked, for stated reasons, at any time. In addition, the Minister reserves the right to revoke the derogation where updated information indicates that the basis upon which the derogation was granted has materially changed.
4. The mitigation measures outlined in the application report (**Supporting Document – Bat Derogation Licence Application Cleeves Riverside Quarter, Co. Limerick**) together with any changes or clarification agreed in correspondence between NPWS and the agent or applicant, are to be carried out. Strict adherence must be paid to all the proposed measures in the application.
5. The actions which this derogation authorise shall be completed between **30<sup>th</sup> April 2026 – 31<sup>st</sup> December 2026, inclusive**.
6. The works will be supervised by bat ecologist(s): **Sara Fissolo & Pat Roberts**.
7. Orientation of the bat house and internal layout shall be modified as per conditions below to minimise potential light spill into and disturbance of underground compartment and reduce high levels of airflow into the structure from the west. NPWS will be happy to detail this further if any additional clarification is necessary.
8. Advice from project engineer is required prior to construction as to ensure the best balance between preventing potential flooding of underground chamber and floor area and maintaining high humidity inside the underground compartment and bat house. This may require consideration of barrier membrane or other sealing methods.
9. The building should be rotated 180 degrees from its original specifications. As such the door for human access would now face northwest and the gable end with the bat access point would face southeast.
10. An additional bat access point will be added into the wall of the now northeastern side of the building.
11. Instead of a steel door containing an access grill for bats, a lockable solid steel door with no openings will be used. This is to reduce light entering the roost and minimise potential for antisocial behaviour, predator entry or other disturbance to the interior of the roost. LHB access will be via two VWT style access points.
12. A Vincent Wildlife Trust design anti predator (tipping platform) access opening for LHBs be located on the gable end (now southeast side of the building) as well as what is now the northeast side of the building.
13. The underground chamber will be 2 m in depth (not the 1m suggested) and the roof of which shall be a surface with suitable gripping points for LHBs to hang from.
14. After construction, conditions in and around the Clonmacken bat house will be monitored to ensure:
  - External light levels around the building are below 1 Lux. If this is not being achieved measures such as planting, screening or adaption of nearby lighting will be undertaken.
  - Humidity levels inside the building will be assessed after construction to ensure they are suitable for lesser horseshoe bat roosting (60-70%). If humidity is at unsuitable levels measures will be put in place to correct this.
15. Future use of the bat house will be monitored so that any potential problems preventing or limiting usage may be addressed in consultation with NPWS.

16. The council ensure that adequate yearly budget is made available as required for maintenance, repairs and monitoring of the bat house. This is to ensure that at all times the bat house is kept in suitable condition for bats using or which may wish to use the bat house at any point throughout the year.
17. The derogation does not provide consent to proceed with any works that may also be subject to another approval (for example, planning permission).
18. The derogation is based upon information provided in the application. Where this information may cease to be accurate due to the passage of time or changes to the circumstances giving rise to the need for the derogation, the derogation holder is responsible for notifying the NPWS.
19. If this derogation expires prior to works permitted under this derogation commencing, a new application must be sought in advance, including the provision of any updated data or reports.
20. This derogation shall be produced for inspection on a request being made on that behalf by a member of An Garda Síochána or an authorised NPWS officer appointed under Regulation 4 of the Habitats Regulations.
21. The local **NPWS Regional Manager – Aine Lynch**, [aine.lynch@npws.gov.ie](mailto:aine.lynch@npws.gov.ie), must be contacted prior to construction to ensure design conditions have been met, and if bats are detected on site during the course of the work, under the terms of this derogation. Any results from monitoring should be shared with NPWS staff.
22. On completion of the actions which this derogation authorises, all recordings of bat species affected will be made using the standardised Returns Form and must be submitted to the NPWS within **four weeks of the expiry of the derogation or the 31<sup>st</sup> January each year**, should the derogation run for longer than one calendar year. Additionally a report will also be submitted detailing results of works and success of mitigation. **Both documents must be submitted to constitute a derogation return** and should be submitted to [wildlife.reports@npws.gov.ie](mailto:wildlife.reports@npws.gov.ie)



**NPWS**

An tScribhís Páircenna  
Náisiúnta agus Fiadhúlra  
National Parks and Wildlife  
Service

**For the Minister for Housing, Local Government & Heritage**

*Claire Costey*

(an officer authorised by the Minister to sign on his behalf)

**30 April 2026**

Any query in relation to this derogation should be sent to [reg54derogations@npws.gov.ie](mailto:reg54derogations@npws.gov.ie)



## Derogation Assessment

**Name of Applicant: Martin Ryan**

**Location/Name of Project: Cleeves Riverside Quarter, County Limerick**

**Tick the following prohibition as chosen on the application:**

(a) Deliberately capture or kill any specimen of the relevant species in the wild	<input type="checkbox"/>
(b) Deliberately disturb these species particularly during the period of breeding, rearing, hibernation and migration	<input checked="" type="checkbox"/>
(c) Deliberately take or destroy eggs of the relevant species in the wild	<input type="checkbox"/>
(d) Damage or destroy a breeding or resting place of such an animal, or	<input checked="" type="checkbox"/>
(e) Keep, transport, sell, exchange, offer for sale or offer for exchange any specimen of the relevant species taken in the wild, other than those taken legally as referred to in Article 12(2) of the Habitats Directive.	<input type="checkbox"/>
(a) Deliberately pick, collect, cut, uproot or destroy any specimen of these species in the wild, or	<input type="checkbox"/>
(b) Keep, transport, sell, exchange, offer for sale or offer for exchange any specimen of these species taken in the wild, other than those taken legally as referred to in Article 13(1)(b) of the Habitats Directive.	<input type="checkbox"/>

### Test 1: A reason(s) listed in Regulation 54 (a)-(e) applies to the proposed activity

i. Tick which reason the applicant claims should be applied to the derogation

(a) In the interests of protecting wild flora and fauna and conserving natural habitats,	<input type="checkbox"/>
(b) To prevent serious damage, in particular to crops, livestock, forests, fisheries and water and other types of property	<input type="checkbox"/>
(c) In the interests of public health and public safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment,	<input checked="" type="checkbox"/>
(d) For the purpose of research and education, of re-populating and re-introducing these species and for the breeding operations necessary for these purposes, including artificial propagation of plants, or	<input type="checkbox"/>
(e) To allow, under strictly supervised conditions, on a selective basis and to a limited extent, the taking or keeping of certain specimens of the species to the extent specified therein, which are referred to in the First Schedule.	<input type="checkbox"/>



ii. Test 1: Conclusion

Please tick the following where it applies:

There is a valid reason(s) listed in Regulation 54 (a)-(e) which applies to the proposed activity:	Yes	<input checked="" type="checkbox"/>
	No	<input type="checkbox"/>

**Please outline your analysis below and state how the applicant has provided evidence to support your conclusion:**

The application form and associated documentation provided by the applicant has been reviewed in full. The application relies on regulation 54(2)(c) *‘in the interests of public health and public safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment’* as the reason chosen for a derogation that they believe applies to the proposed activity.

In the detail provided, it is clear that the applicants are relying on the imperative reasons of overriding public interest, including those of a social or economic nature aspect of Reason C.

As outlined on page four of the accompanying report titled “Supporting Document”, the derogation is required to facilitate proposed works in the Docklands of Limerick City, at the former Cleeves factory.

The objective of the proposed works, comprising phase 2 of the overall masterplan involves the stabilisation and repair of the Flaxmill protected structure on the site. The report further outlines on page five from a policy context, regeneration of the site is “promoted at national, regional and local policy level” and also “prioritised for investment under the Urban Regeneration and Development Fund”

The overall objective of the masterplan as noted on page 17 of the report is to “is to revitalise and transform the Cleeves site and surrounding area to deliver a World Class Waterfront development in Limerick’s urban core”. This transformation will support the local economy through business investment, local employment opportunities and address housing needs.

The applicants have provided evidence as to the nature and scale of the overriding public interest reasoning and the proposed activity is necessary to achieve these overall objectives. Based on the above this application has passed Test 1 and can now proceed to Test 2 |



**Test 2: Absence of a satisfactory alternative**

Please tick the following where it applies and add a comment below to support the recommendation:

The applicant has provided satisfactory evidence that alternative solutions have been considered and have given reasons why the proposed approach is the only satisfactory alternative:	Yes	<input checked="" type="checkbox"/>
	No	<input type="checkbox"/>

**Please outline your analysis below and state how the applicant has provided evidence to support your conclusion (If you wish to add additional conditions please complete pg. 6):**

The documentation submitted by the applicant has been reviewed, including the evidence for alternative solutions.

The purpose of the derogation is to allow the following activity to take place:

- A. Demolition of a number of structures to facilitate development including (i) Salesians Secondary School and Fernbank House; (ii) 2 no. houses on North Circular Road; (iii) Residual piers from the basin of the reservoir; (iv) Upper Reservoir on Stonetown Terrace comprising 2 no. concrete water tanks, pump house and liquid storage tank; (v) 1960’s lean-to building structures adjoining the Cold Store (former Weaving Mill); (vi) c20th rear lean-to of the Flaxmill Building; (vii) c.1960s office building adjoining the Packing Store and Cheese Plant on North Circular Road; (viii) Cluster of buildings including altered part of the Linen Store, the former Linen Store, Storage Building, and Office/Lab building at O’Callaghan Strand / Stonetown Terrace with partial retention of existing stone wall; (ix) warehouse on the Shipyard site; and (x) partial removal of stone boundary wall defining the Cleeves site adjoining O’Callaghan Strand / Stonetown Terrace. Some of the demolition works / partial demolition works overlap with Phase I works associated with the emergency stabilisation and repair of the Flaxmill building.
  
- B. Construction and phased delivery of:
  - 1. Residential Development in 4 development ‘zones’ within the site ranging in height from 3 – 7 storeys (with screened service plant at roof level) comprising; (a) 234 no. residential units; (b) 270 no. student bedspaces with ancillary resident services at ground floor level; (c) 256sqm of commercial floorspace; and (d) a creche. The specific development details of each proposed development zone comprise the following:
    - i. Salesians Zone – 1 no. building with 2 no. blocks extending to 6 and 7 storeys comprising 146 no. apartments (76 no. 1 bed; and 70 no. 2 bed); a creche; undercroft car and bicycle parking; reception area, plant rooms, and refuse storage, with screened external plant at roof level; 20 no. 3 storey 3 bed triplex units; and 30 no. car parking spaces for the dedicated use of the adjoining Salesians Primary School.
    - ii. Quarry Zone – 1 no. Purpose Built Student Accommodation building with 3 no. blocks extending to 6 and 7 storeys comprising 270 no. bedspaces with study rooms, shared areas, exercise room, reception area, plant rooms, refuse storage and bicycle parking all at ground floor level and

screened external plant at roof level. Provision is made for communication antennae on the rooftop of one block. Consent is also sought for use of the PBSA accommodation, outside of student term time, for short-term letting purposes.

- iii. Stonetown Terrace Zone – 1 no. building extending to 5 storeys comprising 38 no. apartments (6 no. studios; 12 no. 1 beds; and 20 no. 2 beds) with plant rooms and refuse storage at ground level, ancillary infrastructure at basement level at northern end of the block, with screened external plant at roof level; 9 no. 3-storey 3-bed townhouses; and a dedicated secure bicycle storage facility.
  - iv. O’Callaghan Strand Zone – 1 no. building extending to 4 / 5 storeys comprising 21 no. apartments (9 no. 1 bed and 12 no. 2 bed) with an open roof structure accommodating communal open space and plant; and 256qm of commercial ground floorspace intended to accommodate Class 1, Class 2 and / or Class 3 uses, with provision for car parking in the undercroft.
2. Dedicated mobility hub with canopy including double stacker bicycle parking; and EV Charging spaces, within the Shipyard Zone. A dedicated pedestrian/cycle link connects North Circular Road with Condell Road. The remaining area of the zone shall accommodate temporary car parking and a temporary external event space to be used on a periodic basis as the need arises, pending future redevelopment proposals as detailed in the Masterplan (Stage IV).
  3. Extensive provision of Public Realm including creation of the Reservoir/Quarry Park, the Flaxmill Square and the Riverside Corridor. Significant areas of civic and green spaces are provided, incorporating formal and informal play space; nature based SuDs, permeability and access; provision of heritage interpretative panels; and a riverside canopy functioning as an outdoor event space.
  4. 3 no. dedicated bat houses; and
  5. All ancillary site development works including (a) water services, foul and surface water drainage and associated connections across the site and serving each development zone; (b) attenuation proposals; (c) raising the level of North Circular Road between Fernhill and O’Callaghan Strand; (d) temporary construction access to the Quarry site including provision of a temporary bridge across the reservoir; (e) refuse collection store (f) car and bicycle parking; (g) public lighting; and (h) all landscaping works.

The specific situation that needs to be addressed is the project will entail

1. The destruction of resting (not breeding) places of a population of two lesser horseshoe (*Rhinolophus hipposideros*) and small roost (<5 individuals) of soprano pipistrelle (*Pipistrellus pygmaeus*).
2. Potential disturbance to a small soprano pipistrelle roost counting approx. 6-8 bats that will be retained as part of the development but could be subject to disturbance during construction and operation.

The alternative solutions suggested by the applicant are:

A do-nothing scenario was considered. If the proposed development was not to go ahead, the habitats within the site would likely be retained and remain available to bats. However, due to its prominent location within Limerick City, the site is likely to be utilised or redeveloped in some form that would likely result in an alteration of use of the site by the small number that currently use it. Such a scenario where the bat roosts were retained

would likely not be supported at national, regional and local policy level for the redevelopment of this city centre location.

Substantial mitigation has been incorporated into the proposals for the development site and these will assist in minimising the impact. An impact is, however unavoidable if the development is to proceed hence the requirement for derogation. To mitigate this off site mitigation is proposed by way of a new bat house to be constructed at a key location (Clonmacken) to maximise potential usage by lesser horseshoe and other bat species. This mitigation was suggested by NPWS, the developers have committed to it and having it in place before demolition works begin at the main site. NPWS regional staff support this proposal and see it as a potential positive for the bat species particularly LHBS locally and at a strategic location to potentially open up movement of LHB between the north and south of Limerick. Such movement is a key conservation concern and will be assisted by the development.

The applicant has provided satisfactory evidence that alternative solutions have clearly been considered. As outlined on pages 17-18 of the accompanying report.

Based on the assessment of the application documentation, it is regarded that the applicant has considered all available alternative solutions and at this time, no other alternative solutions are apparent. Having weighed the possible solutions to solve the applicant's problem against the effects of a derogation on the species concerned, it is concluded that the application has passed Test 2 and can proceed to Test 3 |

Upon completion of your assessment, please return this Recommendation to WLU to continue the application process.



**Test 3: Impact of a derogation on conservation status of the species**

Please tick the following where it applies and add a comment below to support the recommendation:

The derogation would NOT be detrimental to the maintenance of the populations of the species in question at a favourable conservation status in their natural range.	Yes	<input checked="" type="checkbox"/>
	No	<input type="checkbox"/>

**Please outline your analysis below and state how the applicant has provided evidence to support your conclusion. (If you wish to add additional conditions please complete pg. 6)**

Roosts for Lesser horseshoe bat (LHB) and soprano pipistrelle bat were identified on site. LHB is in unfavourable conservation status nationally, while the soprano pipistrelle is in favourable conservation status.

Although the proposed renovations will remove the roosting opportunities, the planned mitigation measures include retention of roosting space in the buildings, additional night roosting locations for LHB and the creation of a new bat house further to the west outside the boundary of the site. Thus, increasing the roosting opportunities and enhancing the long-term suitability of the area for bats. Particularly in area which is a pinch point for LHB movement.

Provided the mitigation measures are implemented in full and the conditions of this licence are followed, the works will not be detrimental to the maintenance of the populations of the species in question at a favourable conservation status in their natural range.

If the answer above is Yes then the derogation may be granted, providing Tests 1 and 2 have also been met.

Upon completion of your assessment, please return this Recommendation to WLU to continue the application process.



### Derogation decision

The application for a derogation under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations, 2011 (S.I. 477 of 2011), as amended, has been assessed by officials in the Department and the following decision has been made:

#### **Tick box where appropriate:**

There is no satisfactory alternative

and the derogation is not detrimental to the maintenance of the populations of the species to which the Habitats Directive relates at a favourable conservation status in their natural range.

Therefore, a derogation may be granted to the applicant, since it is—

(a) in the interests of protecting wild fauna and flora and conserving natural habitats

(b) to prevent serious damage, in particular to crops, livestock, forests, fisheries and water and other types of property,

(c) in the interests of public health and public safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment,

(d) for the purpose of research and education, of repopulating and re-introducing these species and for the breeding operations necessary for these purposes, including the artificial propagation of plants, or

(e) to allow, under strictly supervised conditions, on a selective basis and to a limited extent, the taking or keeping of certain specimens of the species to the extent specified therein, which are referred to in the First Schedule.

**OR This application has been refused as one or more of the conditions set out above have not been met**



The following conditions should be attached to the derogation:

1. Orientation of the bat house and internal layout shall be modified as per conditions below to minimise potential light spill into and disturbance of underground compartment and reduce high levels of airflow into the structure from the west. NPWS will be happy to detail this further if any additional clarification is necessary.
2. NPWS shall be consulted prior to construction to ensure design conditions have been met.
3. Advice from project engineer is required prior to construction as to ensure the best balance between preventing potential flooding of underground chamber and floor area and maintaining high humidity inside the underground compartment and bat house. This may require consideration of barrier membrane or other sealing methods.
5. The building should be rotated 180 degrees from its original specifications. As such the door for human access would now face northwest and the gable end with the bat access point would face southeast.
6. An additional bat access point will be added into the wall of the now northeastern side of the building.
7. Instead of a steel door containing an access grill for bats, a lockable solid steel door with no openings will be used. This is to reduce light entering the roost and minimise potential for antisocial behaviour, predator entry or other disturbance to the interior of the roost. LHB access will be via two VWT style access points.
8. A Vincent Wildlife Trust design anti predator (tipping platform) access opening for LHBs be located on the gable end (now southeast side of the building) as well as what is now the northeast side of the building.
9. The underground chamber will be 2 m in depth (not the 1m suggested) and the roof of which shall be a surface with suitable gripping points for LHBs to hang from.
10. After construction, conditions in and around the Clonmacken bat house will be monitored to ensure:
  - External light levels around the building are below 1 Lux. If this is not being achieved measures such as planting, screening or adaption of nearby lighting will be undertaken.
  - Humidity levels inside the building will be assessed after construction to ensure they are suitable for lesser horseshoe bat roosting (60-70%). If humidity is at unsuitable levels measures will be put in place to correct this.
11. Future use of the bat house will be monitored so that any potential problems preventing or limiting usage may be addressed in consultation with NPWS.
12. Any results from monitoring should be shared with NPWS staff.
13. The council ensure that adequate yearly budget is made available as required for maintenance, repairs and monitoring of the bat house. This is to ensure that at all times the bat house is kept in suitable condition for bats using or which may wish to use the bat house at any point throughout the year.

Signed: .

Date: April 30, 2026

Position: Ecologist

## CHAPTER TWO PROJECT DESCRIPTION

### 2.1 INTRODUCTION

This chapter of the Environmental Impact Assessment Report (EIAR) Addendum provides clarifications and amendments to Volume 2, Chapter 2.0 Project Description of the EIAR submitted as part of the application for approval to An Comisiún Pleanála.

This Addendum is intended to be read in conjunction with Chapter 2.0 of the original EIAR, submitted as part of the application for approval, to ensure a comprehensive understanding of the updates provided in response to the Request for Further Information (RFI).

### 2.2 REQUEST FOR FURTHER INFORMATION

Chapter 2.0 has been reviewed in the context of the RFI items and to consider the additional information submitted, in particular the consequences of the Bat Derogation License, which necessitates ex situ works by the applicant on other land in their ownership. Further the minor design revisions occurring as a result of the further information response have been reviewed and detailed in this chapter.

For completeness the full RFI Response has been considered in the preparation of this addendum chapter and where relevant, information from that response has been considered and incorporated as appropriate.

### 2.3 CLARIFICATIONS AND AMENDMENTS

Unless explicitly stated otherwise, the text provided below either replaces, amends, or supplements the corresponding sections within the original EIAR submitted as part of the planning application. All other content in Volume 2, Chapter 2.0 remains unchanged.

#### 2.3.1 Correction to Section 2.3 Table 7.1 (Page No. 2-15 of the Original EIAR)

Table 7.1 requires amendment to take account of a correction to the density calculation and the communal open space provision. Further, a correction has been made to the capacity of the creche facility which can accommodate 36 no. children.

No. of Residential Units	234 no. units	
	Apartments 205 no.	Townhouses & Triplex Units 29 no.
Unit Mix	Number	Percentage
Studio	6	2.5%
1 bed apartment	97	41.4%
2 bed apartment (3 person)	98	41.8%

2 bed apartment (4 person)	4	1.7%
3 bed townhouses & Triplex Units	29	12.3%
Number of Student Bed Spaces	270 no. bedspaces <sup>1</sup>	
Creche Area	381sqm Capacity for 36 no. children	
Commercial Floorspace	299sqm	
Site Area Gross	5.09 hectares gross	
Site Area Net	2.63 hectares <sup>2</sup>	
Density	122.5 units per hectare	
Floor Area to be Demolished	11,000sqm GIA	
Gross Floor Area	33,877sqm	
Building Height	3 - 7 storeys	
Plot Ratio	0.8 (net site area)	
Site Coverage	25% of net site area	
Public Open Space	7,817sqm of public realm (15.3% of total site)	
Communal Open Space	2,812sqm	

### 2.3.2 Correction to Section 2.5.3 First Paragraph (Page No. 2-20 of the Original EIAR)

The proposed development provides for the equivalent of 315 no. residential units, including 234 no. apartments, triplex units and townhouses; and 270 no. purpose built student accommodation bedspaces.

#### Salesians Zone

Salesians will create 166 no. new homes for Limerick. The apartments are made up of one-bedroom two-person apartments (46%), two-bedroom four-person apartments (42%) and three-bedroom five-person back-to-back triplexes (12%). The zone is served with 1076sqm of communal open space.

### 2.3.3 Correction to Section 2.5.4 First Paragraph (Page No. 2-22 of the Original EIAR)

A creche is accommodated at ground floor level within Block B in the Salesians Zone in the heart of the scheme. It is accessible from the hillside steps, which includes a ramp, or by a publicly-accessible lift next to the basement car park entrance. The creche with a floor area of 381sqm has capacity for 36 no. children.

### 2.3.4 Correction to Section 2.5.6 Second Paragraph (Page No.2-23 of the Original EIAR)

The Mobility Hub will accommodate 36 no. cargo bike spaces; 84 no. double stacker bicycle spaces; and 6 no. EV Charging spaces. It is intended to serve the proposed development and the proposed Phase III educational campus development by TUS. The Hub shall be relocated as part of any future Phase IV development on the Shipyard Site. The Mobility Hub currently provides for 10 no. car parking spaces and 26 no. temporary car parking spaces pending redevelopment of the site.

<sup>1</sup> 4 bed spaces equate to 1 no. residential units as per definition provided in the Sustainable Residential Development & Compact Settlement Guidelines

<sup>2</sup> Excludes Shipyard Site, Riverside Site, North Circular Road, Infiltration Gallery and Flaxmill as these are not intended for residential use. It includes 0.78 hectares of public realm

### 2.3.5 Additional Information to Section 2.6.1 Third Paragraph (Page No. 2-32 of the Original EIAR)

Stage 1: Construction of Bat Houses - A 3-month period is allocated exclusively to this stage to allow bats on-site to adjust to their new accommodation. This stage shall include construction of the ex-situ bat house located on land at Clonmacken and which is necessary to satisfy the terms of the Bat Derogation License. No other construction activity will overlap with this stage.

### 2.3.6 Additional Information to Section 2.6.4 First Paragraph (Page No. 2-34 of the Original EIAR)

The first activity to be carried out at the site will be the establishment of site facilities and security. The site office and welfare facilities (site compounds) including 36 no. temporary construction parking spaces will be located on the Shipyard site for most phases, with development in the O'Callaghan Strand Zone and in the Quarry Zone accommodating independent site compounds, following construction of the Mobility Hub within the Shipyard site. Refer to Figures 2-3 to 2-11 of the Outline CEMP. All the sub-contractors as well as the main contractor and project managers will occupy offices within the construction compound. The site parking for ~~all staff, contractors and~~ visitors will also be located in this area.

### 2.3.7 Additional Information to and Removal of Wording from Section 2.8 Second Paragraph (Page No. 2-34 of the Original EIAR)

~~There are no secondary or off-site development works necessary to facilitate the development proposal save for connection to the existing road network and water services.~~

A Bat Derogation License, Derogation Number DER-BAT-2026-201, has been submitted in support of the development proposal and is attached as an Appendix to this chapter.

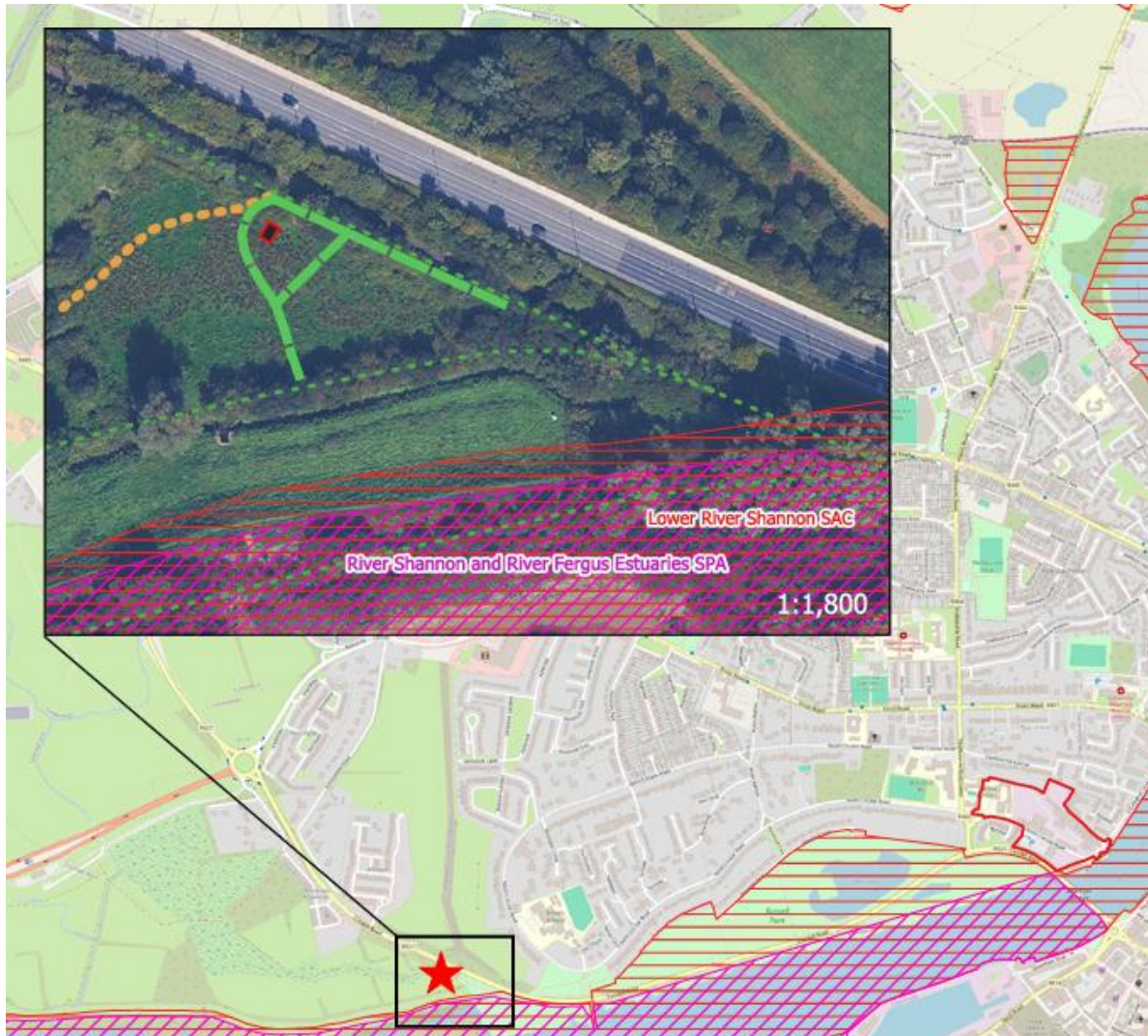
In addition to the provision of 3 no. bat houses on site; the retention of the commuting routes into and out of the site; the provision of suitable dark and vegetated foraging areas within the quarry and reservoir areas; and the replacement of the roosting habitat that will be lost throughout the site, all proposed as part of the development proposal and detailed in Chapter 7.0 Biodiversity, the National Parks & Wildlife Service (NPWS) requested additional ex situ measures.

The proposed ex-situ bat house location, was selected following detailed consultations with NPWS, who suggested Clonmacken as a suitable area for the construction of an additional bat house for lesser horseshoe bats. The bat house is intended to enhance roosting opportunity in Limerick City and in proximity to suitable foraging and commuting grounds along the River Shannon. Owned by Limerick City & County Council the lands are located approximately 1.5km to the west of the Cleeves site, as detailed in Figure 2.10 below.

The proposed ex situ bat house shall be delivered by Limerick City & County Council in partnership with Limerick Twenty Thirty, in advance of construction works on the Cleeves site.

Section 4(i) (b) of the Planning and Development Act 2000 (as amended) provides that development by the council of a county in its functional area, is exempted development where the project is being carried out on behalf of, or jointly or in partnership with, a local authority. Article 80(1)(k) provides a general cost threshold of €126,000, whereby such works can advance without the need for a public consultation process (Part 8). As the erection of an ex situ bat house is to be carried out by the local authority and is

less than this cost threshold, its development does not need to be taken through a Part 8 process. Furthermore, the development has been screened for the purposes of Appropriate Assessment whereby it was concluded that the proposed development of a bat house at the location site would not likely give rise to significant effects on a European site.



**Figure 2.10** Location of Bat House Identified by Red Star

Temporary fencing will be installed where necessary to define the working area and prevent encroachment beyond the approved footprint at Clonmacken. Access for light machinery and material deliveries will be via the existing farm access to the west of the site. Groundworks will be limited to minor localised site levelling within the bat house footprint to accommodate a 3.5 m × 5.0 m reinforced concrete foundation, and a localised sunken below-ground chamber. The bat house will be constructed using standard concrete blockwork walls, a timber roof structure with a natural slate roof.

Excavated material will be stored within the working area and reused where possible for additional bunding or removed from site in accordance with waste management procedures. On completion of construction, linear landscape features will be established around the bat house to enhance connectivity and screening. Existing hedgerows along the greenway will be reinforced through additional planting. A native treeline will be installed to the north of the bat house to provide long-term screening from artificial

light sources. No artificial lighting will be used during construction that could affect nearby bat commuting routes.

**2.3.8 Additional Information to and Removal of Wording from Section 2.11 Second Paragraph (Page No. 2-43 of the Original EIAR)**

~~This project does not involve or rely on any other related projects or give rise to significant ex-situ effects that should be considered as part of this EIAR. The applicant is satisfied that all projects are contained within the confines of the masterplan boundary as presented and assessed in this EIAR.~~

As part of the project design process and in response to the NPWS a specific ex-situ measure has been proposed to reduce the potential for impacts. As there is a commitment by the applicant to implement this measure in advance of demolition / construction commencing on site, the proposed ex-situ bat house is considered inherently part of the design of the Project. This measure has already been presented in Section 2.8 and has been considered in assessments presented in this Addendum EIAR.

## CHAPTER SIX POPULATION & HUMAN HEALTH

### 6.1 INTRODUCTION

This chapter of the Environmental Impact Assessment Report (EIAR) Addendum provides clarifications and amendments to Volume 2, Chapter 6.0 Population & Human Health of the EIAR submitted as part of the application for approval to An Comisiún Pleanála.

This Addendum is intended to be read in conjunction with Chapter 6.0 of the original EIAR, submitted as part of the application for approval, to ensure a comprehensive understanding of the updates provided in response to the Request for Further Information (RFI).

#### 6.1.1 Details of Competent Experts

In accordance with Article 5(3) of the EIA Directive (2011/92/EU, as amended by 2014/52/EU), the EIAR submitted as part of the application for approval, along with this EIAR Addendum, has been prepared by a multi-disciplinary team of competent experts.

Details of all competent experts involved in the preparation of the EIAR are provided in Volume 2, Chapter 1.0 Introduction, of the original EIAR and remain the same for this Chapter of the Addendum EIAR.

### 6.2 REQUEST FOR FURTHER INFORMATION

Chapter 6.0 has been reviewed in the context of the RFI items and to consider the additional information submitted, in particular the consequences of the Bat Derogation License, which necessitates ex situ works by the applicant on other land in their ownership. Further the minor design revisions occurring as a result of the further information response have been reviewed and detailed in this chapter.

For completeness the full RFI Response has been considered in the preparation of this addendum chapter and where relevant, information from that response has been considered and incorporated as appropriate.

### 6.3 CLARIFICATIONS AND AMENDMENTS

Unless explicitly stated otherwise, the text provided below either replaces, amends, or supplements the corresponding sections within the original EIAR submitted as part of the planning application. All other content in Volume 2, Chapter 6.0 remains unchanged.

#### 6.3.1 Additional Information to Section 6.4.1 Bullet Points (Page No. 6-13 of the Original EIAR)

To frame the identification of baseline receptors and potential pathways, the key elements of the proposed scheme are summarised below from Chapter 2.0:

- » **Demolition:** Removal of a number of existing structures.
- » **Residential Development:** Construction and phased delivery of 234 units (205 apartments and 29 townhouses/triplex units) across four zones—Salesians, Quarry, Stonetown Terrace, and O’Callaghan Strand.
- » **Mobility Hub & Access:** Provision of bicycle parking, EV charging spaces, and a dedicated pedestrian/cycle link between North Circular Road and Condell Road.
- » **Public Realm:** Creation of new civic and green spaces, including the Reservoir/Quarry Park, Flaxmill Square, Riverside Corridor, and areas for formal and informal play.
- » **Ecological Measures:** Provision of three dedicated bat houses and an ex-situ dedicated bat house located at Clonmacken some 1.5km west of the Cleeves Site
- » **Ancillary Works:** All associated site development and infrastructure works

### 6.3.2 Additional Information to Section 6.4.3.1 Sixth Paragraph (Page No. 6-17 of the Original EIAR)

At a local level, the Cleeves site comprises two zoning types: predominantly “City Centre” mixed uses, supporting commercial, residential, civic, cultural, leisure, and retail activity, with Stonetown Terrace zoned for existing residential use to protect and enhance amenity. The site represents the only major development opportunity on the right bank of the River Shannon, functioning as a gateway location with high visibility and connectivity. The proposed development is aligned with the Cleeves quarter masterplan that was prepared in 2023 to ensure phased, coherent, and sustainable development, balancing densification, mixed-use objectives, and the conservation of heritage assets of the site.

The proposed ex-situ bat house located 1.5km west of the Cleeves site is zoned for agricultural purposes where the objective is to protect and improve rural amenity and provide for the development of agricultural uses. The provision of a bat house on these lands is therefore in full accordance with the principle of the land use zoning and remote from neighbouring residential development.

### 6.3.3 Correction to Section 6.4.3.2 Tenth Paragraph (Page No. 6-20 of the Original EIAR)

In terms of **residential amenities** for future occupants of the development, the scheme incorporates a crèche (capacity for 34 36 children, matching projected demand), private and public open space, and improved permeability through retention of historic boundary walls. These features will support families, improve community wellbeing, and provide heritage value by preserving key-built elements of social interest.

## 6.4 IMPLICATIONS FOR THE EIAR

The amendments set out above do not materially alter the findings, conclusions, or overall assessment presented in Chapter 6.0: (Population & Human Health) of the original EIAR.

## CHAPTER EIGHT CULTURAL HERITAGE - ARCHAEOLOGY

### 8.1 INTRODUCTION

This chapter of the Environmental Impact Assessment Report (EIAR) Addendum provides clarifications and amendments to Volume 2, Chapter 8: Cultural Heritage - Archaeology of the EIAR submitted as part of the application for approval to An Comisiún Pleanála.

This Addendum is intended to be read in conjunction with Chapter 8.0 of the original EIAR, submitted as part of the application for approval, to ensure a comprehensive understanding of the updates provided in response to the Request for Further Information (RFI).

#### 8.1.1 Details of Competent Experts

In accordance with Article 5(3) of the EIA Directive (2011/92/EU, as amended by 2014/52/EU), the EIAR submitted as part of the planning application, along with this EIAR Addendum, has been prepared by a multi-disciplinary team of competent experts.

Details of all competent experts involved in the preparation of the EIAR are provided in Volume 2, Chapter 1.0 Introduction, of the original EIAR and remain the same for this Chapter of the Addendum EIAR:

### 8.2 REQUEST FOR FURTHER INFORMATION

Chapter 8.0 has been reviewed in the context of the RFI items and to consider the additional information submitted, in particular the consequences of the Bat Derogation License, which necessitates ex situ works by the applicant on other land in their ownership. Further the minor design revisions occurring as a result of the further information response have been reviewed in the context of their potential to alter the predicted impacts to cultural heritage - archaeology.

For completeness the full RFI Response has been considered in the preparation of this addendum chapter and where relevant, information from that response has been considered and incorporated as appropriate.

### 8.3 CLARIFICATIONS AND AMENDMENTS

Unless explicitly stated otherwise, the text provided below either replaces, amends, or supplements the corresponding sections within the original EIAR submitted as part of the planning application. All other content in Volume 2, Chapter 8.0 remains unchanged.

#### 8.3.1 Additional Information to Section 8.3.1 Fifth Paragraph (Page No. 8-5 of the Original EIAR)

The scope of the assessment area is extended to consider the additional information of the proposed development and is summarised below from Chapter 2.0, Section 2.3.7:

- » **Ecological Measures:** Provision of three dedicated bat houses and an ex-situ dedicated bat house located at Clonmacken some 1.5km west of the Cleeves Site

The groundworks shall entail 'minor localised site levelling within the bat house footprint to accommodate a 3.5 m × 5.0 m reinforced concrete foundation, and a localised sunken below-ground chamber.'

#### **8.3.2 Additional Information to Section 8.4 Seventh Paragraph (Page No. 8-62 of the Original EIAR)**

An ex-situ dedicated bat house located at Clonmacken some 1.5km west of the Cleeves Site is ancillary to the current development. It shall entail a small footprint, within very limited groundworks. The location of the bat house does not reside within or close to the scope of any recorded archaeological sites or previous archaeological work. There shall be no construction or operational impacts, nor shall there be cumulative impacts from the development.

#### **8.4 IMPLICATIONS FOR THE EIAR**

The amendments set out above do not materially alter the findings, conclusions, or overall assessment presented in Chapter 8.0: (Cultural Heritage - Archaeology) of the original EIAR.

## CHAPTER SEVEN BIODIVERSITY

### 7.1 INTRODUCTION

This chapter of the Environmental Impact Assessment Report (EIAR) Addendum provides clarifications and amendments to Volume 2, Chapter 7.0 Biodiversity of the EIAR submitted as part of the application for approval to An Comisiún Pleanála.

This Addendum is intended to be read in conjunction with Chapter 7.0 of the original EIAR, submitted as part of the application for approval, to ensure a comprehensive understanding of the updates provided in response to the Request for Further Information (RFI).

#### 7.1.1 Details of Competent Experts

In accordance with Article 5(3) of the EIA Directive (2011/92/EU, as amended by 2014/52/EU), the EIAR submitted as part of the planning application, along with this EIAR Addendum, has been prepared by a multi-disciplinary team of competent experts.

Details of all competent experts involved in the preparation of the EIAR are provided in Volume 2, Chapter 1.0 Introduction, of the original EIAR and remain the same for this Chapter of the Addendum EIAR: Pat Roberts, Principal Ecologist at MKO, and Sara Fissolo, Project Ecologist at MKO.

### 7.2 REQUEST FOR FURTHER INFORMATION

Chapter 7.0 has been reviewed in the context of the RFI items and to consider the additional information submitted, in particular with relation to the construction of an ex-situ bat house by the applicant on other land in their ownership. All other minor design revisions occurring as a result of the further information response have been reviewed in the context of their potential to alter the predicted impacts to biodiversity.

For completeness the full RFI Response has been considered in the preparation of this addendum chapter and where relevant, information from that response has been considered and incorporated as appropriate.

### 7.3 CLARIFICATIONS AND AMENDMENTS

The requests for clarification and necessary amendments in relation to Chapter 7 of the EIAR have been addressed in the following sections. Additionally, any identified oversights have been corrected.

Unless explicitly stated otherwise, the text provided below either replaces, amends, or supplements the corresponding sections within the original EIAR submitted as part of the planning application. All other content in Volume 2, Chapter 7.0 remains unchanged.

### 7.3.1 Correction to Section 7.1.3 (Page No. 7-5 of the Original EIAR)

This Section has been corrected to introduce the correct reference to Table 7.1.3-1 to replace an error warning where a reference source was not found, as per below.

All surveyors have relevant academic qualifications and are competent in undertaking habitat and ecological assessments (*Table 7.1.3-1*).

### 7.3.2 Correction to Section 7.3.2.1 (Page No. 7-29 of the Original EIAR)

This Section has been corrected to introduce the correct reference to Plate 7.3-3 to replace an error warning where a reference source was not found, as per below.

There are 16 buildings in total within the site boundary, including old industrial buildings in the centre of the site associated with the Flaxmill factory building (Plate 7.3-1); a school and convent in the Salesians Site (Plate 7.3-2); derelict warehouses and offices near O'Callaghan Strand; and two disused residential buildings and warehouses along North Circular Road (NCR) (*Plate 7.3-3*).

### 7.3.3 Revision to Section 7.7.2.3 (Page No. 7-83 of the Original EIAR)

Section 7.7.2.3 has been updated. The revised text, set out below, replaces and revises the corresponding 'Loss of Bat Roosting Habitat and Mortality' section in the original EIAR to account for works on Phase I having started since the Original EIAR was submitted, and to provide a description of the ex-situ bat house.

#### *Loss of Bat Roosting Habitat and Mortality*

A derogation licence (DER-BAT-2025-169, *DER-BAT-2026-79*) is in place for Phase I works relating to the remediation works on the Flaxmill building, where LHB roosts were identified. The following mitigations apply to this phase and are relevant to the continued monitoring of the bat activity within the site prior to and during the construction of the Application Site (Phase II):

- A pre-commencement survey *has been* carried out to assess the buildings where roosting was identified prior to any works. The function of this survey *was* to assess any changes in baseline environment since the time of last undertaking surveys in 2024, and to prevent direct harm on bats.
- Prior to commencement, a toolbox talk *has been* carried out by the project ecologist to inform working crews of the potential effects of the works on resident bats, and known roosting locations will be clearly pointed out. Roosting locations will be avoided where possible.
- While it is recommended to avoid works during the bat activity season (April – September), it is understood that this cannot be avoided due to the structural integrity of the building being at risk. *The work programme has commenced in January 2026 and is expected to run for a period of 12 months.*
- Based on the work programme, regular site visits will be undertaken by a licenced bat ecologist at different stages of the works to assess progress and use of known roosts by bats, as well as checking access to known locations is maintained. Inspections will make use of scaffolding equipment where possible to expand bat searches to previously unreachable areas.

- Bat access to the first floor will be maintained throughout the works by ensuring access points are kept free from obstruction. The roost locations on the first floor will not be used to store materials and will be kept free from human traffic.
- Interior lighting will be restricted to the areas where works are being undertaken and any exterior lighting will be turned off when not in use.

In addition to these, it has been proposed to also limit lighting during works in adjacent buildings so as to provide alternative dark environments in buildings adjacent to the Flaxmill during Phase I.

*A derogation licence application has been obtained from NPWS (DER-BAT-2026-201). The application documentation submitted is presented in Appendix 7-4. The derogation licence is issued by NPWS on a yearly basis, and therefore it is expected that multiple licences will be necessary. Each licence will be informed by monitoring undertaken at the site and will be specific to the works to be undertaken during the calendar year. NPWS will be informed of any progress made during construction with regular updates. As part of the derogation licencing process, NPWS has requested the additional ex-situ measure described below to be included, to enhance roosting opportunity for lesser horseshoe bats in Limerick City.*

The following additional mitigations in relation to the construction works for Phase II will apply in addition to the mitigation detailed in page 7-84 and 7-85 of the EIAR.

- *The Ex-situ bat house will be in place prior to Phase II works commencing. The design will include all measures conditioned by NPWS as part of the derogation licence.*

#### **Ex-situ Bat House**

*An agricultural site at Clonmacken in Limerick City, has been identified as a suitable location for the construction of an additional bat house for lesser horseshoe bats. The bat house is intended to enhance roosting opportunity in Limerick City and in proximity to suitable foraging and commuting grounds along the River Shannon. The site is located approximately 1.5km to Cleeves Riverside Quarter. The ex-situ bat house location (ITM X555243 Y656748) was selected following consultations with NPWS, who suggested Clonmacken as a suitable area, and Limerick City and County Council, who own the site and approved the location for use by Limerick Twenty Thirty.*

*The bat design followed a case study presented in CIEEM guidelines (Reason and Wray, 2023, Case Study 1) which was successfully taken up by breeding and hibernating lesser horseshoe bats. The NPWS also included design conditions as part of the derogation licence issued (DER-BAT-2026-201). This is a cement block building with a natural slate roof developed on three levels, a ground floor level, an attic space with roof dormer and a sunken chamber created with a pre-cast concrete ring and cover. The building is oriented south-east for sun exposition and to allow for microclimates to develop within the structure throughout the day, allowing for suitable conditions for maternity roosts, transitional roosts, day/night roosting as well as potential for hibernation within the cooler insulated ground floor and humid sunken floor. It includes two ground-floor entrances suitable for lesser horseshoe bats (Schofield, 2025) as well as other openings suitable for other species via raised roof tiles and barge boards, and an integrated bat box suitable for crevice dwellers at its south-western aspect. The open truss roof design facilitates flight movement within the attic space.*

*The ex-situ bat house will be delivered as soon as possible and will be in place prior to large scale demolitions taking place at Cleeves Riverside Quarter. The design and location were selected to require minimal ground works, involving minor site levelling, concrete 3.5x5m foundation and accommodations for the sunken chamber possible with light machinery, and no vegetation clearance other than grassland vegetation removal within the bat house footprint. Access to the location, for light machinery and materials, is viable via existing farm access to the west of the site. Ready mix concrete will be used and due to the small scale of the works, and the ~45m distance to the nearest drain, any potential runoff from excavations and concrete pouring will be contained and is not expected to significantly impact water quality at any geographic scale. The building will be constructed with standard blockwork, a wooden roof structure, and slate roof waterproofed with bituminous roofing felt which does not contain filaments (i.e. bitumen felt type 1F).*

*Additional linear features will be created around the ex-situ bat house, and existing hedgerows along the greenway will be bolstered to screen the area from artificial lighting and to create further commuting corridors. A mix of native hedge species, including fast growing species such as willow (*Salix sp.*), will be planted. In addition, a native treeline will be planted to screen the area from the north. This section may also require screening fencing to separate the bat house location from an existing wayleave and potential future development, whilst the treeline establishes. The existing hedgerows along the Condell Road greenway and the vegetation lining the drains along the existing flood relief embankments located south of the house will be retained indefinitely.*

*There will be an allowance for accommodations for additional planting, micro-siting, or modifications to the existing lighting in proximity of the site to be implemented as the ex-situ bat house is constructed and monitored.*

#### **7.3.4 Revision to Section 7.8.1.3 (Page No. 7-90 of the Original EIAR)**

Section 7.8.1.3 Residual Effects on Fauna has been updated to reflect the addition of ex-situ measures. The revised text, set out below, revises the 'Roosting Bats' section in the original EIAR.

##### ***Roosting Bats***

Following the incorporation of mitigation measures for roosting bats as described above, and the provision of alternative roosting resource, there will be no significant residual effect on roosting bats at any geographic scale as a result of this development. As a result of the development phased approach and the provision of temporary bat houses, roosting availability will be retained onsite during construction until the proposed bat houses and bat boxes are erected. *In addition, the provision of additional ex-situ maternity and hibernacula roosting habitat prior to construction is expected to enhance roosting opportunity along the River Shannon, in proximity to the development, likely resulting in long-term positive residual effects for bat species, and lesser horseshoe bats in particular.*

#### **7.3.5 Amendment to Figure 7.7-1 (Page 7-86 of the Original EIAR)**

Figure 7.7-1 has been amended to incorporate the revised landscape plan. The location of proposed bat mitigation measures has remains unchanged. The Figure is presented at page 7-7.

### 7.3.6 Amendment to Section 7-11 References (Page 7-94 of the Original EIAR)

Chapter 7: Biodiversity reference list has been amended to include the following reference:

- Schofield H. (2025). *The Lesser Horseshoe Bat: Conservation Handbook Second Edition*. The Vincent Wildlife Trust, Herefordshire, UK.

### 7.3.7 Amendment to Appendix 7-4 of the Original EIAR

Appendix 7-4 has been updated to provide the most up to date derogation licence application supporting documentation, which includes the bat house design, a site location map and the existing ecological baseline at the ex-situ location.

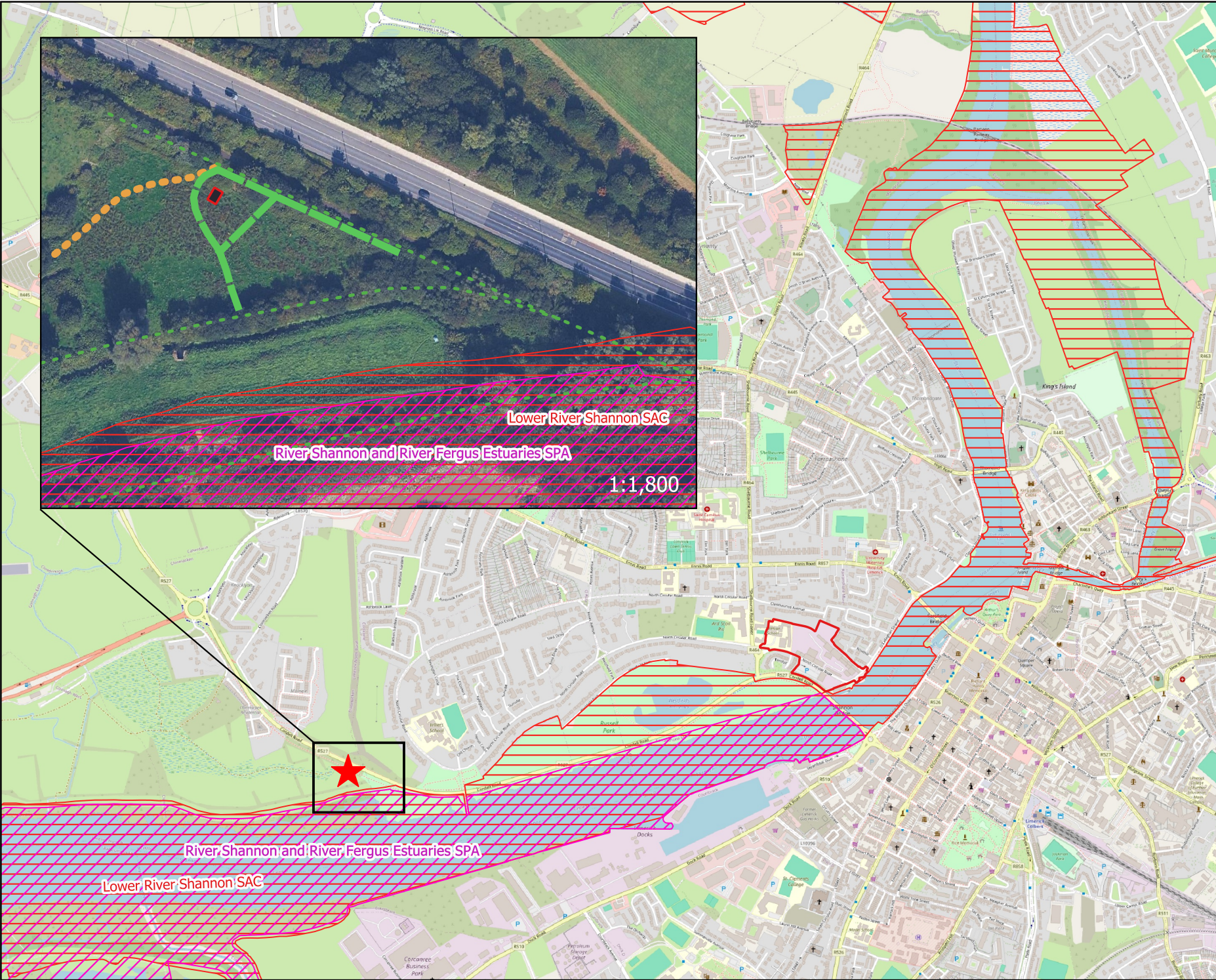
This supersedes Appendix 7-4 of the Original EIAR. Added design details from NPWS are found in the obtained licence (DER-BAT-2026-201) provided in Appendix 6-1.

## 7.4 IMPLICATIONS FOR THE EIAR





The amendments set out above do not materially alter the findings, conclusions, or overall assessment presented in the original EIAR.

Chapter 7: Biodiversity of the EIAR has been updated by way of this Addendum to ensure appropriate consideration of the off-site measures for the provision of a Bat House as detailed in the Derogation License approved by the NPWS in February 2025 (please refer to Volume 3, Appendix 6.1). In addition, a number of clarifications have been made to enhance the accuracy and clarity of the chapter.


This additional information supplements the original assessment but does not result in any negative change to the conclusions reached in the EIAR regarding Biodiversity. Positive residual effects are anticipated as a result of the provision of additional roosting habitat for bat species off-site.



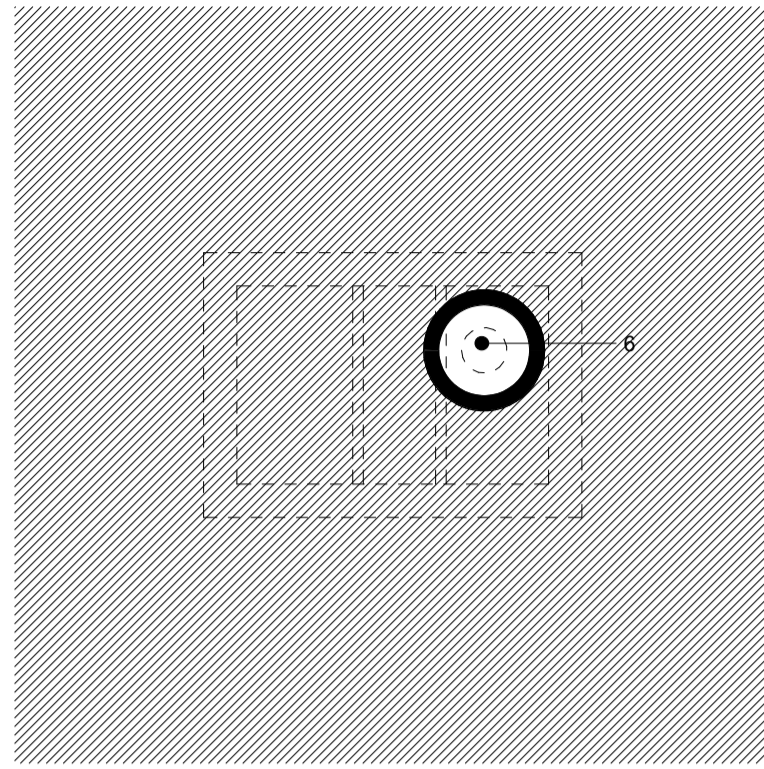
**Legend**

-  Site Location
-  LTT Cleeves Riverside Quarter
-  Bat House  
3.5x5m Footprint
-  Special Area of Conservation (SAC)
-  Special Protection Areas (SPA)
-  Existing Corridors for Retention
- Proposed Additional Planting**
-  Native Hedge
-  Treeline and Fence

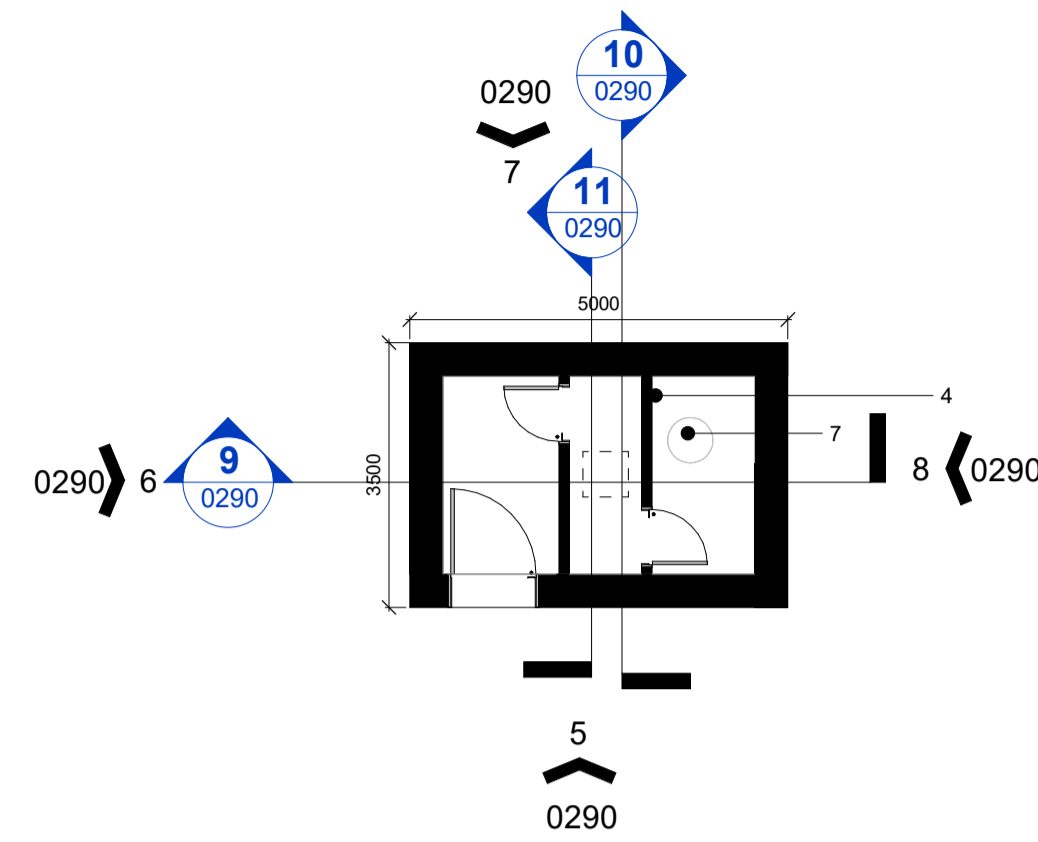
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Drawing Title	
<b>Site Location</b>	
Project Title	
<b>Lesser Horseshoe Bat House</b>	
Drawn By	Checked By
SF	SF
Project No.	Drawing No.
211052-c	Figure 1-1
Scale	Date
1:18,000	31.03.2026

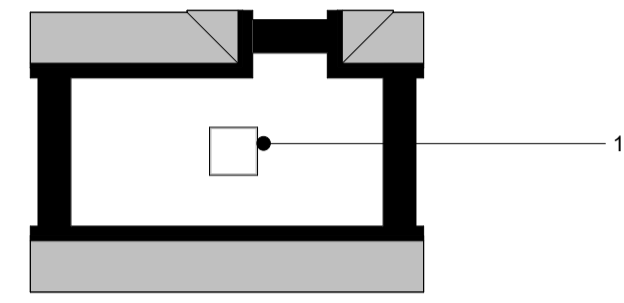

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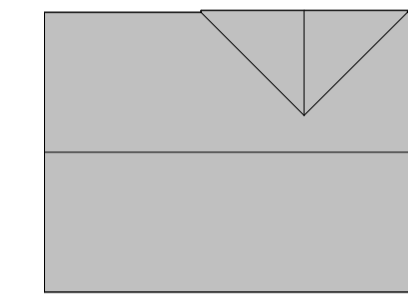
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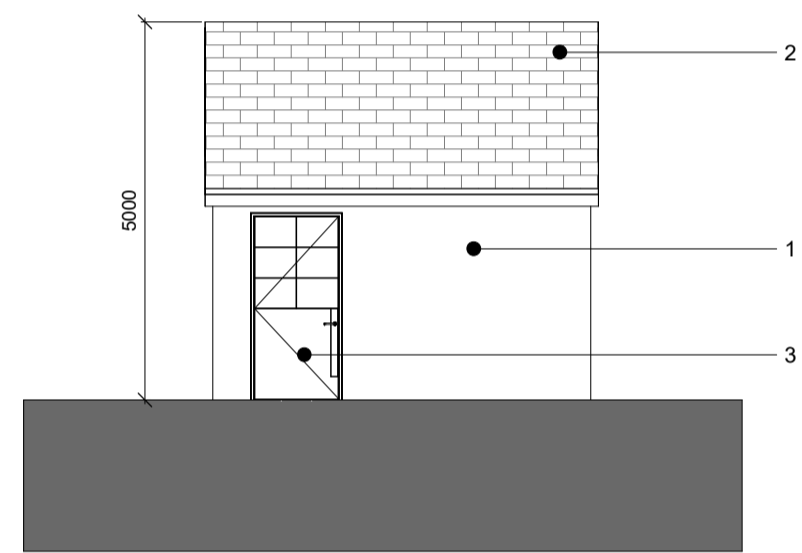
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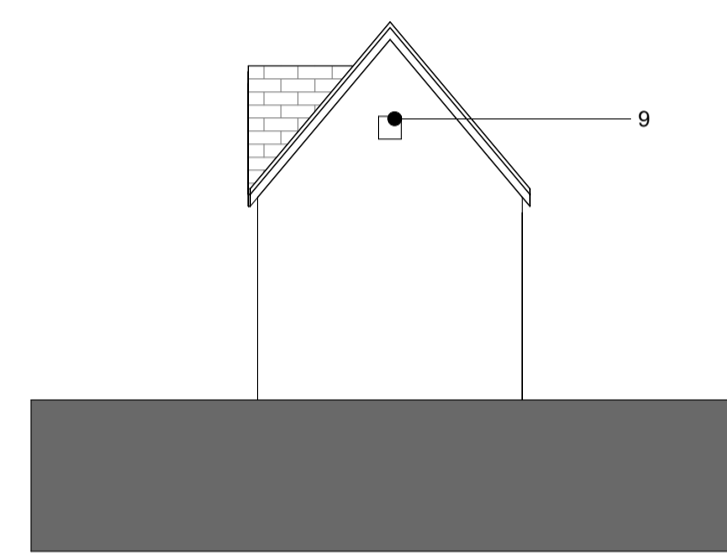
**3 Plan - Attic Level**  
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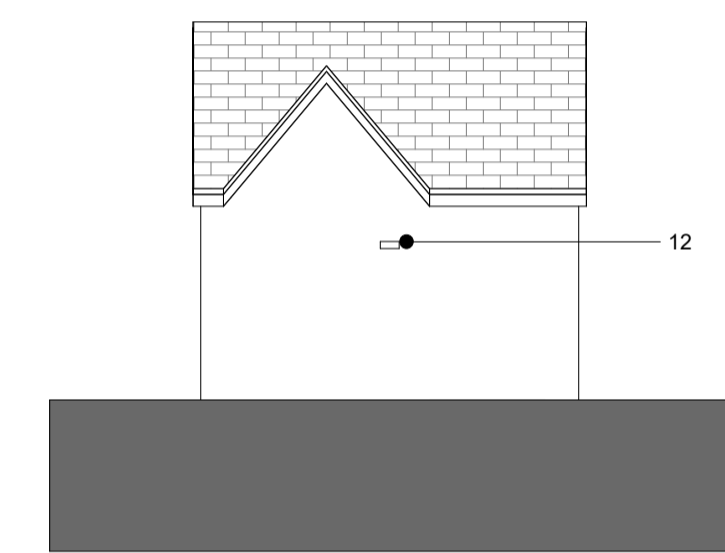
**4 Plan - Roof Level**  
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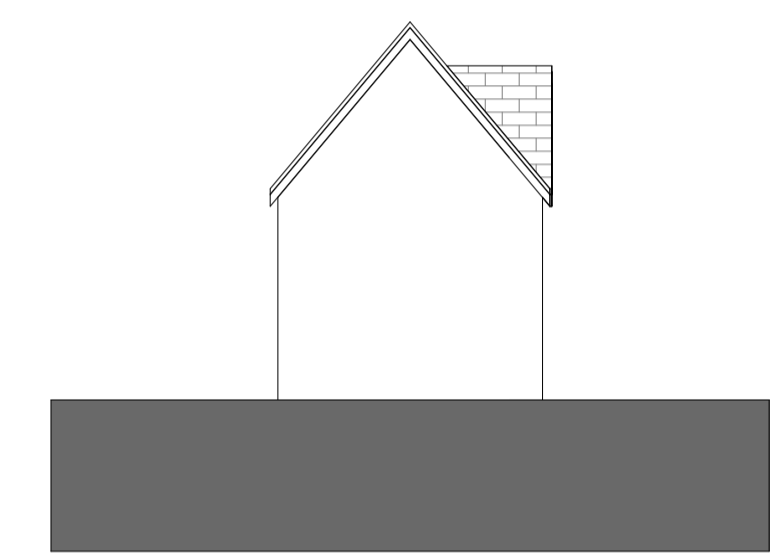
**5 Elevation - South East**  
1 : 100



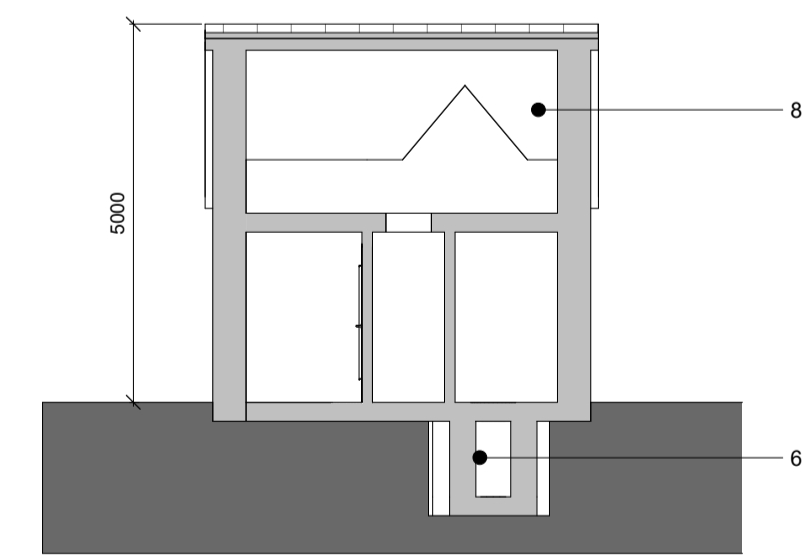
**6 Elevation - South West**  
1 : 100



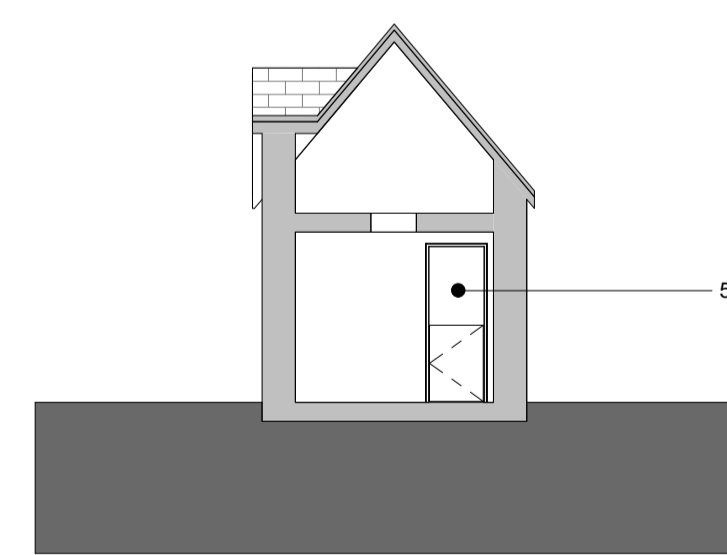
**7 Elevation - North West**  
1 : 100



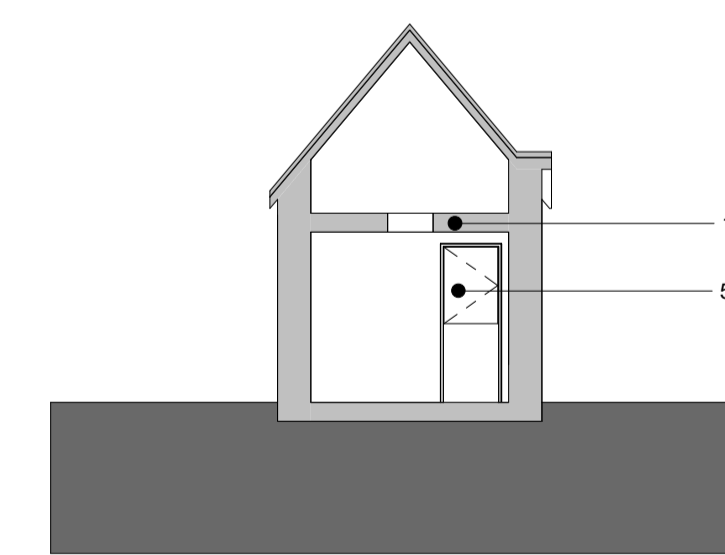
**8 Elevation - North East**  
1 : 100



**9 Long Section**  
1 : 100



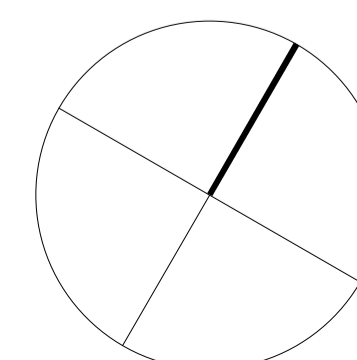
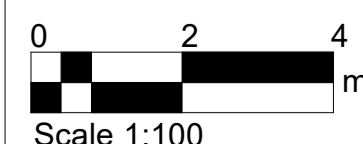
**10 Cross Section 01**  
1 : 100



**11 Cross Section 02**  
1 : 100

- Bat House Material Key**
- 01 Mid-grey render on blockwork
  - 02 Slate roof with raised ridge tiles. Bitumastic roofing felt beneath tiles. Access gaps behind barge boards.
  - 03 Dark grey coloured metal secure door with grill and gaps for bat access
  - 04 Internal blockwork walls
  - 05 Half door (top/bottom closed)
  - 06 Sunken pre-cast concrete ring chamber (1.2m wide, 1m deep)
  - 07 Access manhole to sunken chamber
  - 08 Open plan truss roof, with purlins at 1m above Attic FFL. Baffles on the rafters
  - 09 Integrated bat box
  - 10 Open attic hatch with ply collar
  - 11 Insulated Attic floor
  - 12 Second Wall Entry Point

**NOTES:**  
Dimensions are not to be scaled from this drawing.  
Drawing only to be used for the purposes it was issued for.  
Landscape, public realm and neighbouring buildings shown indicatively.  
Existing building plans and elevations are based on survey information drawings received on 11.08.2020 GEODATA-Measured Buildings Survey (Blocks 1-14)



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Rev	Status
P01	Planning Issue

Date
01.04.26

Job/Drawing No	Revision
CRQMP-FCBS-XX-00-DR-AA-0290 P01	
Cleeves Limerick	Status
Bat House General Arrangement	
Scale As indicated@A1	Drawn London
Date 01/08/2025	Checked GW
FCBS project no 2027	

Do not scale All dimensions to be checked on site

## **Supporting Document – Bat Derogation Licence Application**

Cleeves Riverside Quarter,  
Co. Limerick





## DOCUMENT DETAILS

Applicant: **Limerick Twenty Thirty (LTT)**

Project Title: **Cleeves Riverside Quarter, Co. Limerick**

MKO Project Number: **211052-c**

Document Title: **Supporting Document – Bat Derogation Licence Application**

Document File Name: **DERBAT SD – F – 211052-c – 2026.04.10**

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Rev	Status	Date	Author(s)	Approved By
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02	Final	10.04.2026	SF	PR

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## APPENDICES

- Appendix 1** – Landscape Plan
- Appendix 2** – EIAR Chapter 2 – Project Description
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- Appendix 4** – Baseline Bat Report
- Appendix 5** – Proposed Lighting Plan
- Appendix 6** – Ex-Situ Bat House Location and Plan

# 1. INTRODUCTION

This report provides information in support of an application for a derogation under Regulation 54 & 4A of the European Communities (Birds and Natural Habitats) Regulations 2011, as amended. This application is specifically for:

1. The destruction of resting (not breeding) places of a population of two lesser horseshoe (*Rhinolophus hipposideros*) and small roost (<5 individuals) of soprano pipistrelle (*Pipistrellus pygmaeus*).
2. Potential disturbance to a small soprano pipistrelle roost counting approx. 6-8 bats that will be retained as part of the development but could be subject to disturbance during construction and operation.

The above derogation is required to facilitate a proposed development that is being undertaken by Limerick Twenty Thirty on behalf of Limerick County Council.

The proposed development includes phase 2 of a Masterplan for the development of the Cleeves Site in Limerick City. The Masterplan, published in 2023 was prepared in response to the requirements for a coordinated and holistic approach to development on the Cleeves Site (5.30 hectares) as detailed in the Limerick Development Plan 2022 – 2028. It provides a broad framework for LTT's vision for the future and creative re-use of this strategic city centre site and its valuable assets, providing a flexible and phased approach to development.

The ambition of Limerick Twenty Thirty (LTT) is to revitalise and transform the Cleeves site and surrounding area to deliver a World Class Waterfront development in Limerick's urban core. The transformative project seeks to achieve a number of primary objectives:

- supporting the growth of a strong local economy;
- encouraging and facilitating new business investment;
- retaining and integrating the historic buildings and site industrial heritage with contemporary buildings;
- accommodating a mix of uses anchored by a public realm that relates and links to the city core and the River Shannon, whilst implementing high-quality urban design, with sustainable and innovative design.

Once fully developed, the site has the potential to accommodate future population growth through residential unit provision and to further promote a strong local economy through the creation of employment and new local attractions, thereby encouraging and facilitating new business investment.

In order to provide the necessary information to consider this application, this report is accompanied by a full description of all bat surveys undertaken on the site; a description of the proposed development including its policy context and planning history; the proposed lighting plan and the proposed landscaping plan.

The derogation licence application has been prepared by Pat Roberts and Sara Fissolo.

Sara Fissolo is an ecologist with MKO with over five years' experience in ecological consultancy. Sara holds a BSc. (Hons) in Ecology and Environmental Biology from University College Cork. Sara first joined MKO in 2019 and has since worked as a member of MKO's dedicated bat unit, where she

scopes and manages bat survey requirements for a variety of projects, including wind-farms planning applications. She has specialised in carrying out bat survey requirements for developments and nature conservation projects, including habitat appraisals and roost assessments, manual/static activity surveys and data analysis, and produces bat report outputs to inform Ecological Impact Assessments, Environmental Impact Assessments and Appropriate Assessments. Sara's role includes keeping up to date with scientific literature and guiding her team and the rest of the ecology team on how to assess impacts on bats. She attended Wildlife Acoustics, Bat Conservation Ireland (BCI), Bat Conservation Trust (BCT) and CIEEM courses on surveying heritage buildings for bats, on performing advanced survey techniques and identification, on bats and lighting, on performing bat care, on assessing the impact of developments on bats and on the use of Kaleidoscope Pro Software. Sara is a member of BCI, for which she carries out volunteer surveys, is a qualifying member of CIEEM.

Pat Roberts is Principal Ecologist at MKO with over 20 years' experience. Pat's key strengths include his depth of knowledge and experience of a wide range of ecological and biodiversity topics. He currently operates as technical lead within the Ecology Team at MKO. He also manages training and development and ensures that the outputs from the ecology team are of a very high standard and meet the requirements of the clients. Pat has extensive experience in providing ecological services for large-scale infrastructure projects including roads, windfarms and railway construction and maintenance.

## 2. BACKGROUND TO PROPOSED ACTIVITY

### 2.1 Site Location and Project Description

The Proposed Development site is located in the Docklands of, Co. Limerick (Grid Ref: R 57051 57119) and is accessed via The North Circular Road. The Proposed Development site is located on the former Cleeves factory site on the northern bank of the River Shannon. The site location is provided in Figure 1.1 and a site layout is provided in the Landscaping Plan, which is provided as Appendix 1.

The Project Description chapter of the EIAR that accompanies the application for the Proposed Development, is provided as Appendix 2. A brief summary is provided below.

The proposed development comprises Phase II, of an overall Masterplan with four phases of development proposed. Phase II is subsequent to ongoing stabilisation and repair of the Flaxmill protected structure (Phase I). Phase III is intended to comprise an educational campus, inclusive of the adaptive reuse of the Flaxmill Building as part of that development and will be subject to a future separate application. Phase IV comprising the Shipyard site will be the final phase of development.

Two structures within the site are designated protected structures: the Flaxmill Building (PS Ref no.264 & NIAH No. 21512053) and the octagonal brick chimney (PS Ref no.265 & NIAH No. 21512059), which are to be retained. Other structures on the site will be removed to facilitate the proposed redevelopment.

The proposed development includes:

- A. Demolition of a number of structures to facilitate development including (i) Salesians Secondary School and Fernbank House; (ii) 2 no. houses on North Circular Road; (iii) Residual piers from the basin of the reservoir; (iv) Upper Reservoir on Stonetown Terrace comprising 2 no. concrete water tanks, pump house and liquid storage tank; (v) 1960's lean-to building structures adjoining the Cold Store (former Weaving Mill); (vi) c20th rear lean-to of the Flaxmill Building; (vii) c.1960s office building adjoining the Packing Store and Cheese Plant on North Circular Road; (viii) Cluster of buildings including altered part of the Linen Store, the former Linen Store, Storage Building, and Office/Lab building at O'Callaghan Strand / Stonetown Terrace with partial retention of existing stone wall; (ix) warehouse on the Shipyard site; and (x) partial removal of stone boundary wall defining the Cleeves site adjoining O'Callaghan Strand / Stonetown Terrace. Some of the demolition works / partial demolition works overlap with Phase I works associated with the emergency stabilisation and repair of the Flaxmill building.
- B. Construction and phased delivery of:
  - i. Residential Development in 4 development 'zones' within the site ranging in height from 3 – 7 storeys (with screened service plant at roof level) comprising; (a) 234 no. residential units; (b) 270 no. student bedspaces with ancillary resident services at ground floor level; (c) 256sqm of commercial floorspace; and (d) a creche. The specific development details of each proposed development zone comprise the following:
    - Salesians Zone – 1 no. building with 2 no. blocks extending to 6 and 7 storeys comprising 146 no. apartments (76 no. 1 bed; and 70 no. 2 bed); a creche; undercroft car and bicycle parking; reception area, plant rooms, and refuse storage, with screened external plant at roof level; 20 no. 3 storey 3 bed triplex units; and 30 no. car parking spaces for the dedicated use of the adjoining Salesians Primary School.

- Quarry Zone – 1 no. Purpose Built Student Accommodation building with 3 no. blocks extending to 6 and 7 storeys comprising 270 no. bedspaces with study rooms, shared areas, exercise room, reception area, plant rooms, refuse storage and bicycle parking all at ground floor level and screened external plant at roof level. Provision is made for communication antennae on the rooftop of one block. Consent is also sought for use of the PBSA accommodation, outside of student term time, for short-term letting purposes.
  - Stonetown Terrace Zone – 1 no. building extending to 5 storeys comprising 38 no. apartments (6 no. studios; 12 no. 1 beds; and 20 no. 2 beds) with plant rooms and refuse storage at ground level, ancillary infrastructure at basement level at northern end of the block, with screened external plant at roof level; 9 no. 3-storey 3-bed townhouses; and a dedicated secure bicycle storage facility.
  - O’Callaghan Strand Zone – 1 no. building extending to 4 / 5 storeys comprising 21 no. apartments (9 no. 1 bed and 12 no. 2 bed) with an open roof structure accommodating communal open space and plant; and 256qm of commercial ground floorspace intended to accommodate Class 1, Class 2 and / or Class 3 uses, with provision for car parking in the undercroft.
- ii. Dedicated mobility hub with canopy including double stacker bicycle parking; and EV Charging spaces, within the Shipyard Zone. A dedicated pedestrian/cycle link connects North Circular Road with Condell Road. The remaining area of the zone shall accommodate temporary car parking and a temporary external event space to be used on a periodic basis as the need arises, pending future redevelopment proposals as detailed in the Masterplan (Stage IV).
  - iii. Extensive provision of Public Realm including creation of the Reservoir/Quarry Park, the Flaxmill Square and the Riverside Corridor. Significant areas of civic and green spaces are provided, incorporating formal and informal play space; nature based SuDs, permeability and access; provision of heritage interpretative panels; and a riverside canopy functioning as an outdoor event space.
  - iv. 3 no. dedicated bat houses; and
  - v. All ancillary site development works including (a) water services, foul and surface water drainage and associated connections across the site and serving each development zone; (b) attenuation proposals; (c) raising the level of North Circular Road between Fernhill and O’Callaghan Strand; (d) temporary construction access to the Quarry site including provision of a temporary bridge across the reservoir; (e) refuse collection store (f) car and bicycle parking; (g) public lighting; and (h) all landscaping works.

## 2.2 Policy Context

Regeneration of the Cleeves site is promoted at national, regional and local policy level, providing a solid planning framework for its development. The site is prioritised for investment under the Urban Regeneration and Development Fund (URDF), with enabling infrastructure and governance reforms supporting its transformation. There are a number of more strategic and generic policies and objectives influencing the approach to development on the site. The proposed development has been carefully considered and designed in the context of such strategic policy, mindful of environmental and social, obligations and targets.

Chapter Three of the EIAR for the proposed development (Project Need and Spatial Planning Policy) is provided as Appendix 3.

### 3. BAT SURVEYS AND SITE ASSESSMENT

#### 3.1 Bat Surveys

Bat surveys were conducted at the site over four years, the primary conclusions of the surveys undertaken are detailed below. A Baseline Bat Report is included as Appendix 4. It provides full details of all bat surveys undertaken at the site. The results of the bat surveys are shown in Figure 3-1.

The following points set out the conclusion of all surveys:

- Six bat species, as well as *Myotis* sp. were recorded commuting and foraging across the proposed works site during the bat surveys carried out, including Soprano pipistrelle, Common pipistrelle, Leisler’s bat, Brown long-eared bat, Nathusius’ pipistrelle and Lesser horseshoe bat (LHB).
- Most of the buildings located within the Masterplan site have the potential to support bat roosts. However, no dropping accumulations indicative of large regular roosts were found. The small accumulations of bat droppings and feeding remains recorded suggest that the structures on site are used with likely regularity by a small number of bats. Droppings were found in seven buildings within the proposed development site, either scattered or accumulated under likely LHB perches. One of these LHB perches were confirmed using DNA analysis. Despite multiple revisits, no LHBs were ever noted roosting at these locations during the daytime.
- Four active roosts were identified within the site:
  - One lesser horseshoe bat was observed entering the Coldstore building, west of the Flaxmill, from the ground floor during a dawn re-entry survey, however no confirmation of its day roosting location was possible: the entrance is well connected to the whole interior.
  - A small soprano pipistrelle roost counting approx. 6-8 bats was identified within the western rock face of the Quarry Site
  - Two lesser horseshoe bats were found to be roosting within a derelict classroom building at the back of the Salesians School.
  - Another active roost was found within the Salesians, in the interior yard of the convent. Based on the evidence found in 2025 and the previous surveys undertaken in 2023, the location consistently hosts a small pipistrelle summer roost (*Pipistrellus* sp.).
- Baseline conditions present lighting disturbance around the Flaxmill site near O’Callaghan Strand, where security lighting operates all night, along the NCR and site boundaries, where road illumination spills onto the site, and in the Salesians, where the school currently operated as an accommodation centre. The central Quarry Site, with the Reservoir, present the darkest environments on the site, and the northern boundary, along the quarry walls between the Flaxmill and into the Salesians, was identified as a regular commuting corridor for LHB. This species is particularly sensitive to light pollution and represents the benchmark towards which all impacts on bats will be assessed.
- The commuting corridor for lesser horseshoe bats was confirmed during static and manual surveys to run between at least two identified roosting locations, one at the Salesians and one within the Flaxmill Site. The species utilises the site for foraging purposes and for roosting. No evidence of maternity roost or hibernating behaviour was identified for this species. It is unusual to find lesser horseshoe bats regularly utilising an urban environment. As such, due to the available roosting opportunities, the site is potentially a significant outpost for the species, despite the low numbers of individuals recorded.
- Soprano and common pipistrelles were observed commuting into the site by crossing the North Circular Road (NCR) towards the Reservoir. This location and the westernmost section of the

site, by the Salesians, are considered the most likely entry and exit points into the site. This is as a result of existing, but suboptimal, green infrastructure including treelines and private gardens located outside the MS in these areas.

- With regard to foraging and commuting bats, the reservoir and quarry areas are of Moderate suitability. Built and open areas, such as open yards and open grassland are considered of Low suitability. This assessment was confirmed by the surveys undertaken, which recorded small numbers of bats foraging continuously around the Reservoir and on occasion across the rest of the site. The Quarry Site was confirmed to be the focal point of bat activity around the Masterplan Site, with low activity levels recorded at all other sites. In particular, very little activity was recorded at the Riverfront and in the Salesians front yard.

In summary, the site is utilised by a small number of bats with approximately two lesser horseshoe bats roosting alternately at various locations throughout the derelict buildings on the site. Two small roosts of soprano pipistrelle were also recorded, neither of which were maternity roosts. Some evidence of bats travelling into the site from the south west was identified and the highest levels of foraging activity were around the quarry and reservoir, which are the sections of the site that are currently unlit and vegetated, thus providing the most optimal foraging habitat.

### 3.2

## Significance of Bats on the Site

The ecological significance and importance of the bats and their habitat identified within the study area was also determined with reference to a defined geographical context. This was undertaken following a methodology that is set out in Chapter 3 of the National Road Authority (NRA)'s *Guidelines for Assessment of Ecological Impacts of National Road Schemes Rev 2* (NRA, 2009a). These guidelines set out the context for the determination of value on a geographic basis with a hierarchy assigned in relation to the importance of any particular receptor. The guidelines provide a basis for determination of whether any particular receptor is of importance on the following scales:

- International
- National
- County
- Local Importance (Higher Value)
- Local Importance (Lower Value)

The habitats within and surrounding the Masterplan Site are utilised by a small population of bats that are assigned **Local Importance (Higher Value)** due to their urban nature, relatively low suitability for bats and corresponding low activity levels. The soprano pipistrelles that are roosting on the site are assigned an importance of **Local Importance (Higher Value)** as the species is common and widespread in the local area and the number of roosting bats is small, with no breeding colony recorded. A population of approximately 2 LHB that was recorded roosting on the site was assigned **National Importance**, due to the high sensibility of the Limerick area in maintaining a valuable genetic link for populations in the Kerry and Clare counties. The Masterplan site is not located in proximity of any sites designated for the protection of bats and therefore the population is not considered in association with protected sites.

## 4. REQUIREMENT FOR DEROGATION

The NPWS document, Guidance on the Strict Protection of Certain Animal and Plant Species under the Habitats Directive in Ireland - National Parks and Wildlife Service Guidance Series 1 (2021), was reviewed before undertaking this derogation application.

### 4.1 Actions for which Derogation is Sought

The proposed development has been specifically designed to minimise any effects on bats wherever possible and to mitigate any potential significant effects. The design of the development provides for the retention of the commuting routes into and out of the site; the provision of suitable dark and vegetated foraging areas within the quarry and reservoir areas and the replacement of the roosting habitat that will be lost throughout the site.

However, despite the informed design of the development and proposed mitigation, there is still a requirement for a derogation under Regulation 54 & 4A of the European Communities (Birds and Natural Habitats) Regulations 2011, as amended. This derogation applies specifically and directly to the following actions:

1. The destruction of resting (not breeding) places of a population of two lesser horseshoe (*Rhinolophus hipposideros*) and small roost (<5 individuals) of soprano pipistrelle (*Pipistrellus pygmaeus*). The locations of these roosting sites are shown on Figure 3.1 above and their nature and status is described in Section 3 and Appendix 4.
2. Potential disturbance to a small soprano pipistrelle roost counting approx. 6-8 bats that will be retained as part of the development but could be subject to disturbance during construction and operation. The location of this roosting site is shown on Figure 3.1 above and its nature and status is described in Section 3 and Appendix 4.

#### 4.1.1 Destruction of Resting Places

The design requirements of the development did not allow for the retention of all the bat roosting habitat on the site given the derelict nature of the factory and other buildings and the scope and vision of the Masterplan. It is however, proposed to minimise and mitigate for any significant impacts and ensure that the site continues to be used by bats into the future and suitable roosting and foraging areas are provided within the design along with the retention of commuting routes not and out of the site. In addition to in-situ mitigation and compensation measures, a bat house suitable for lesser horseshoe bats and other bat species is also proposed to be built ex-situ. This is described below.

The following mitigations and enhancements are proposed to ensure that there are no significant effects as a result of the necessary destruction of bat roosts or roosting habitat.

##### 4.1.1.1 Bat Roosting Habitat

##### 4.1.1.1.1 Compensation for Soprano Pipistrelle Roost Loss

The landscape design includes for the retention of the roost identified within the quarry walls. The reservoir arches will also be retained and not illuminated. However a small roost will be lost While no evidence of roosting was found in the tunnels on the site, they do provide suitable resting habitat for bats and birds.

The following mitigation measures will be employed to compensate for the loss of the small roost of soprano pipistrelles within an interior yard of the Salesian’s convent. All measures are shown on Figure 4.1.

- **Flaxmill staircase roost.** As part of Phase 1 works on the Flaxmill, following remediation of the building, an unused attic space above the buildings’ exterior staircase will be retained and isolated from the building. Access via bat slates will be provided into the space.
- **Flaxmill bat slates.** The provision of bat slates on the Flaxmill has also been included in the design to allow space for crevice dwellers to roost on the roof. These will not provide access to the interior.
- **Salesians Site bat pole roost.** A bat pole will be erected along the northern boundary of the Salesians, in the proposed public gardens, to be of use to pipistrelle species currently utilising the convent’s yard.
- **Bat Boxes.** A minimum of three woodcrete bat boxes will be installed at various locations within the site, with final locations to be determined by an ecologist following construction. Provisional locations include on or in proximity to the bat houses along the quarry walls. In addition, two bat boxes suitable for bridges will be erected under one of the tunnel arches to increase roosting suitability in this area. Access into the tunnels will be restricted to prevent disturbance and tampering.

#### 4.1.1.1.2 Lesser Horseshoe Bats Compensations

LHB were recorded utilising the site for roosting and as such it was an important part of the design to ensure roosting availability remained within Cleeves Riverside Quarter for this species. Three bat houses were included in the design to provide choice availability in various weather, season, and life-cycle conditions. The locations of the bat houses were selected to provide safe and undisturbed roosting habitat along identified and recreated commuting corridors and will be positioned away from potential tampering and light disturbance. The bat house design was inspired by Vincent Wildlife Trust’s designs, however a pitched roof was included instead of a sloped roof. The bat houses as soon as possible after site clearance takes place and will replace smaller Cathedine roosts that will be put in place prior to demolitions to provide suitable habitat during the demolition process. All mitigations are shown on Figure 4.1. and example drawings are provided in Plates 4-1 and 4-2.

Three bat houses have been included in the design. The location of the bat houses within the site was considered in connection with the retention of the dark corridor along the quarry walls and to provide access to the Reservoir, while providing options to bats depending on preferred roosting conditions.

- One bat house is proposed to be located against the western quarry wall, under the proposed boardwalk above the reservoir from the Salesians into the Quarry. This location, in proximity to water and partially shaded by the boardwalk, will provide cooler climatic conditions. The entrance into the house, suitable for LHB (30x20cm), will be located on the floor of the suspended house to limit potential bird access.
- One bat house is proposed along the same quarry wall, at the corner with the northern boundary. This house will be also suspended on the quarry to limit potential tampering. The house will not obstruct the existing soprano pipistrelle roost.
- One bat house is proposed along the northern boundary of the Salesians, where a roost was previously identified. This house will be on stilts to prevent tampering.

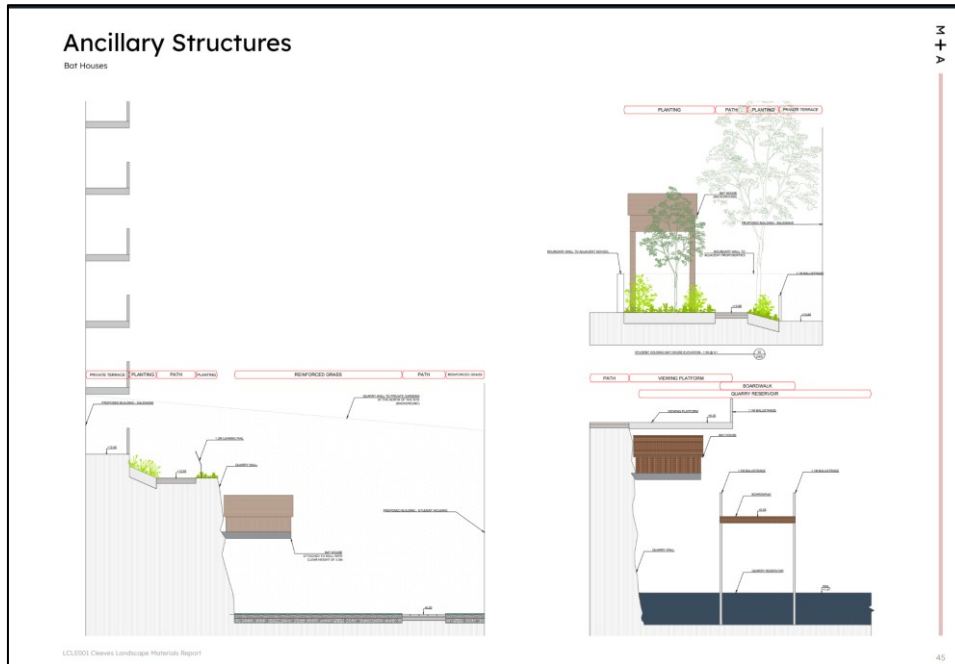


Plate 4-4-1 Extract from LCLE001 Landscape Plan showing proposed bat houses

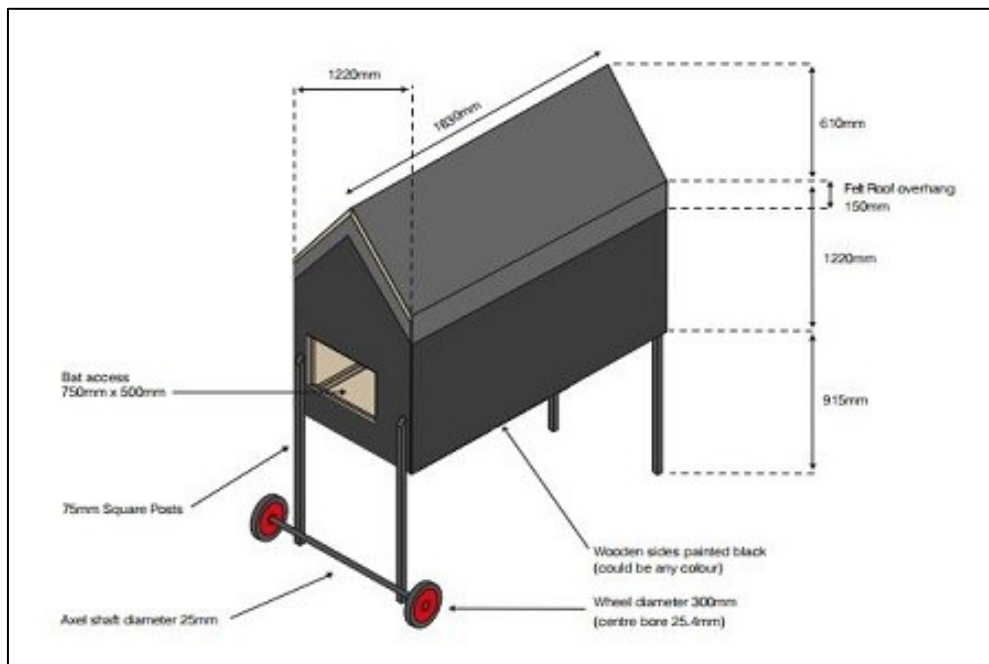


Plate 4-4-2 Cathedrine Roost Example

### 4.1.1.2 Ex-situ Bat House

An agricultural site at Clonmacken in Limerick City, has been identified as a suitable location for the construction of an additional bat house for lesser horseshoe bats. The bat house is intended to enhance roosting opportunity in Limerick City and in proximity to suitable foraging and commuting grounds along the River Shannon. The site is located approximately 1.5km to Cleeves Riverside Quarter (Appendix 6). The ex-situ bat house location (ITM X555243 Y656748) was selected following consultations with NPWS, who suggested Clonmacken as a suitable area, and Limerick City and County Council (LCCC), who own the site and approved the location for a new bat house on LCCC lands for use by Limerick Twenty Thirty.

The Clonmacken area was visited on the 20<sup>th</sup> January 2026 by Sara Fissolo to assess suitable locations for a bat house to be constructed. Habitats were classified in accordance with the Heritage Council’s ‘Guide to Habitats in Ireland’ (Fossitt, 2000). The preferred location is a small field surrounded by hedgerows tucked between the Condell Rd and the flood embankments running along the River Shannon. The site is predominantly *Juncus*-dominated wet grassland (GS4, Plate 4-3). Willow (*Salix sp.*) hedgerows (WL1) with bramble (*Rubus sp.*) and gorse (*Ulex sp.*) scrub separate and screen the site from the existing greenway, where directional lighting fixtures illuminate the greenway (Plate 4-4). Additional hedgerows line the drains (FW4) located approximately 45m south of the proposed bat house location, screening the site from the public walkways along the flood embankments (Plate 4-5). The site is well connected to suitable foraging and commuting habitats for bats to the south, east and west, including the Westfield Wetlands, via existing hedgerows lining Condell Rd. and its adjacent greenway, and wet woodland/scrub vegetation along the River Shannon, in a position which is possible to isolate and screen from potential future development in the Clonmacken area without losing this connectivity. The site location is shown in Appendix 6.



Plate 4-3 Ex-situ lands



Plate 4-4 Existing lighting along the Condell Rd greenway



Plate 4-5 Proposed Ex-situ location screened from view from public walkways along flood embankments

Bat house drawings are also presented in Appendix 6. The design followed a case study presented in CIEEM guidelines (Reason and Wray, 2023, Case Study 1) which was successfully taken up by breeding and hibernating lesser horseshoe bats. This is a cement block building with a natural slate roof developed on three levels, a ground floor level, an attic space with roof dormer and a sunken chamber created with a pre-cast concrete ring and cover. The building is oriented south-east for sun exposition and to allow for microclimates to develop within the structure throughout the day, allowing for suitable

conditions for maternity roosts, transitional roosts, day/night roosting as well as potential for hibernation within the cooler insulated ground floor and humid sunken floor. It includes two ground-floor entrances suitable for lesser horseshoe bats (Schofield, 2025) as well as other openings suitable for other species via raised roof tiles and barge boards, and an integrated bat box suitable for crevice dwellers at its south-western aspect. The open truss roof design (Plate 4-6) facilitates flight movement within the attic space. An integrated bat box will be added to the blockwork at the house’s southern gable to suit crevice dwelling bats such as pipistrelle species.



Plate 4-6 Example of open truss roof design (Reason and Wray, 2023 p. 159)

The ex-situ bat house will be constructed as soon as possible and will be in place prior to large scale demolitions taking place at Cleeves Riverside Quarter. The design and location were selected to minimise ground and site works, involving minor site levelling, accommodations for a 3.5x5m reinforced concrete foundation and for the localised sunken below-ground chamber possible with light machinery, and no vegetation clearance other than grassland vegetation removal within the bat house footprint. Vehicle access to the location, for light machinery and materials delivery, is viable in summer via existing farm access to the west of the site. In addition, materials can be hoisted directly on location from the nearby greenway, without the need to clear vegetation. Ready-mix concrete will be used and pumped onto the site from the Condell Road. Due to the small scale of the works, the use of ready-mixed concrete, and the ~45m distance to the nearest drain, any potential runoff from excavations and concrete pouring will be contained and is not expected to impact water quality. The building will be constructed with standard blockwork, a wooden roof structure, and slate roof waterproofed with bituminous roofing felt which does not contain filaments (i.e. bitumen felt type 1F).

Additional linear features will be created around the ex-situ bat house, and existing hedgerows along the greenway will be bolstered to screen the area from artificial lighting and to create further commuting corridors. A mix of native hedge species, including fast growing species such as willow (*Salix* sp.), will be planted as shown in Appendix 6. In addition, a native treeline will be planted to screen the area from the north. This section may also require screening fencing to separate the bat house location from an existing wayleave and potential future development, whilst the treeline establishes. The existing hedgerows along the Condell Road greenway and the vegetation lining the drains along the existing flood relief embankments located south of the house will not be impacted by the proposed bat house construction.

There will be an allowance for accommodations for additional planting, micro-siting, or modifications to the existing greenway lighting in proximity of the site to be implemented as the ex-situ bat house is constructed and monitored.

#### 4.1.1.3 Bat Foraging and Commuting Habitat

It is noted that the derogation is sought for the loss of roosting habitat and direct mitigation is described above. It is further noted that the provision of such habitat is ineffective if the site no longer provides suitable habitat for the species involved. As such, the design of the proposed development was informed by the findings of bat surveys undertaken at the site, which found the quarry area to be the focus of commuting and foraging bat activity, with the reservoir providing suitable prey availability. This is where the majority of bat activity recorded was concentrated. LHBs were found to be moving across the site along its northern boundary, using the quarry walls and neighbouring private gardens to navigate.

In collaboration with the project ecologists, the landscape (Appendix 1) and lighting (Appendix 5) plans underwent a series of iterations to ensure these habitats remained available and were improved and enhanced as much as possible.

The proposed landscape plan includes for the provision of native planting throughout the Application and Masterplan Sites, which will help provide foraging opportunity for local wildlife:

- As the focus of the proposed development’s landscape, the reservoir will see biodiverse planting mix replacing the existing low diversity scrub and recolonising bare ground which will maintain connectivity along the identified commuting corridors.
- Phytoremediation islands will also be introduced to help purify surface water and will be planted with native flowering mixes to attract invertebrates and boost biodiversity. The planting mixes around the reservoir will promote prey availability for bats.
- A tree canopy will be re-established along the proposed steps into the quarry, which will replace the existing semi-mature gardens of the Victorian terrace. It was not possible to retain the existing trees as their roots extend below derelict buildings to be demolished.
- The quarry walls will be revegetated with climbing mixes if removal of any existing vegetation during construction was necessary, to maintain prey availability and commuting features in this area.
- In front of the Flaxmill, trees will be introduced within movable wooden planters to increase greenery in this zone while allowing for future phases of the masterplan to be implemented.
- Communal gardens and amenity spaces will be created in the Salesians and Stonetown terrace.
- Tree canopy will be added to existing treelines adjacent to the Shipyard to strengthen potential commuting and foraging route, and increase prey availability in this area.

The proposed lighting plan was specifically limited to the provision of lighting that was justified and navigated Limerick City and County Council Public Lighting and Product Specification 2022 Guidance, amongst others:

- The LCCC guidance on outdoor lighting colour temperature request the use of 4000K luminaires in public areas. Following studies carried out on ecological impact on the site, and the identification of foraging bats in the area, the IDT have agreed to the reduced temperature of 2700K luminaires to accommodate the local wildlife requirements. This colour temperature allows for better visual comfort for wildlife.
- The use low-level bollards has also been incorporated into many areas to suit the design team vision for the site. There is a mixture of symmetrical and asymmetrical bollard being used in the proposed scheme.

- Bollards have been used in the trafficked area to the rear of the Quarry building to suit the IDT requirements.
- Handrail lights are used in areas with steps. This lighting type will maximise the lighting on the steps for safety and minimise up light spill and impact on the ecology. Lighting in handrails will be fit with dimming control to achieve appropriate lux levels.
- Surface mounted downlight luminaires are proposed in some areas, primarily the canopy areas on the main site, and in the shipyard. These luminaires were selected to reduce upwards light spill on the site while providing sufficient light fittings for pedestrians within the scheme constraints
- All luminaires will have an LED light source.
- No lighting is directed at the reservoir area or along linear features created or retained.
- Lighting control regimes were implemented across the site:
  - Walkways and amenity areas will be programmed with dusk to midnight switching, and roadways with dusk to dawn switching, as per LCCC specification.
  - The Quarry Roadway being the primary route for the foraging wildlife will incorporate presence detection, the lighting will be off unless there is movement detected that will activate the lights in this area via movement sensors. The purpose of this is to always ensure minimum light in the area to allow maintenance of the foraging route.

#### 4.1.1.4 Construction Mitigations

The following mitigations will be put in place to ensure that no bats are significantly affected during demolition activities.

##### **Masterplan Phase 1**

A derogation licence (DER-BAT-2025-169) is in place for Phase I works relating to the remediation works on the Flaxmill building, where LHB roosts were identified. The following mitigations apply to this phase and will be relevant to the continued monitoring of the site during construction of the Application Site (Phase II):

- A pre-commencement survey will be carried out to assess the buildings where roosting was identified prior to any works. The function of this survey will be to assess any changes in baseline environment since the time of last undertaking surveys in 2024, and to prevent direct harm on bats.
- Prior to commencement, a toolbox talk will be carried out by the project ecologist to inform working crews of the potential effects of the works on resident bats, and known roosting locations will be clearly pointed out. Roosting locations will be avoided where possible.
- While it is recommended to avoid works during the bat activity season (April – September), it is understood that this cannot be avoided due to the structural integrity of the building being at risk. The work programme currently is anticipated to commence in Q2 2025 and run for a period of 12 months.
- Based on the work programme, regular site visits will be undertaken by a licenced bat ecologist at different stages of the works to assess progress and use of known roosts by bats, as well as checking access to known locations is maintained. Inspections will make use of scaffolding equipment where possible to expand bat searches to previously unreachable areas.
- Bat access to the first floor will be maintained throughout the works by ensuring access points are kept free from obstruction. The roost locations on the first floor will not be used to store materials and will be kept free from human traffic.
- Interior lighting will be restricted to the areas where works are being undertaken and any exterior lighting will be turned off when not in use.

In addition to these, it has been proposed to also limit lighting during works in adjacent buildings so as to provide alternative dark environments in buildings adjacent to the Flaxmill during Phase I.

### **Masterplan Phase II (current development)**

The following mitigations in relation to the construction works for Phase II will apply:

- A derogation licence from the NPWS will be in place for the project. The derogation licence is issued by NPWS on a yearly basis, and therefore it is expected that multiple licences will be necessary. Each licence will be informed by monitoring undertaken at the site and will be specific to the works to be undertaken during the calendar year. NPWS will be informed of any progress made during construction with regular updates.
- Prior to commencement, inspections and bat activity surveys will be carried out to ensure no bats are present within the buildings. These will be catered to each specific building. If these cannot rule out the presence of bats, precautions will be taken during the demolitions (manual removals, delayed use of machinery to allow escape) and these will be undertaken under the supervision of an ecologist.
- Demolition works will not be carried out during the bat activity season (April-September) within buildings where active day roosts are found during pre-commencement surveys. Where pre-commencement surveys identify any alternative roosts, similar timing mitigations will be applied.
- A toolbox talk will be carried out by the project ecologist to inform working crews of the potential effects of the works on resident bats, and known roosting locations will be clearly pointed out.
- Prior to demolitions being carried out, alternative roosting resources will be set up to retain roosting availability on site. These will be in the form of three cathedine bat houses, suitable for LHB. Their proposed locations are shown in Figure 4-1. Whilst two of the Cathedine roosts will be located in areas relatively buffered from continuous construction activities, in the Victorian terrace garden and along an existing terrace looking over the reservoir, the third roost will be in the north-western corner of the Quarry Site. A 5m buffer will be created around it to avoid stockpiling and machinery in its immediate vicinity. This is primarily to avoid damage to the roost.
- Other available roosting spaces will be retained along the quarry wall, under the reservoir tunnels and in buildings not proposed for demolition. The permanent bat houses included in the design will also be set up prior to demolition or as soon as possible following site clearance.
- The use of the site by LHB will be monitored during construction using passive static detectors left on site and tuned to the specific frequency calls of the species, to reduce battery and storage usage. A minimum of three detectors at the proposed bat house locations, or nearby, are proposed.

## 4.1.2 **Bat Disturbance**

There is the potential for the proposed development to result in disturbance to the identified roost of 6-8 soprano pipistrelle that is to be retained within the quarry wall. As described above, the development has been designed to ensure that the impacts on the main foraging areas within the site are minimised. These areas include the quarry wall where the roost is located and no significant disturbance of the roost is anticipated during operation. However, without mitigation, there is potential to disturb the roost during construction and the mitigation listed below is in place to prevent any significant effect in this regard. Notwithstanding the likelihood that significant effects can be avoided, a derogation is sought on a precautionary basis, given that there will be significant construction and demolition activity being undertaken around the site and the potential for some level of disturbance still exists.

- A toolbox talk will be carried out by the project ecologist to inform working crews of the potential effects of the works on resident bats, and the known roosting location will be clearly identified.
- Vegetation clearance of non-native species and ivy in proximity of the soprano pipistrelle roost identified within the quarry walls will be avoided if possible. If vegetation clearance is required in this area, it will be carried out outside the bat activity season (April-October) and all clearance works supervised by an appropriately qualified ecologist to ensure that the removal does not damage the existing roost crevice and that suitable cover for the roost entrance is retained or replaced.
- If lighting is required during construction (likely only in early evening and morning during winter months), directional lighting will be used to prevent overspill on to sensitive areas, namely the reservoir and quarry areas. There will be no requirement for lighting of the quarry wall where the bat roost is located.
- Exterior lighting during construction, shall be designed to minimize light spillage, thus reducing the effect on areas outside the Proposed Project, and consequently on bats i.e. Lighting will be directed away from sensitive areas around the periphery of the site boundary to minimize disturbance to bats. Directional accessories can be used to direct light away from these features, e.g. through the use of light shields (Stone, 2013). The luminaries will be of the type that prevent upward spillage of light and minimize horizontal spillage away from the intended lands.

In addition, the applicant commits to the use of lights during construction (such that they are necessary) in line with the following guidance that is provided in the Dark Sky Ireland Lighting Recommendations:

- Every light needs to be justifiable,
- Limit the use of light to when it is needed,
- Direct the light to where it is needed,
- Reduce the light intensity to the minimum needed,
- Use light spectra adapted to the environment,
- When using white light, use sources with a “warm” colour temperature (less than 3000K, ideally 2700K).

## 4.2 Derogation Tests

Article 16 of the Habitats Directive sets out three pre-conditions, all of which must be met before a derogation from the requirements of Article 12 or Article 13 of the Directive can be granted. These preconditions are also set out in Regulation 54 of the Regulations.

The preconditions are:

1. A reason(s) listed in Regulation 54 (a)-(e) applies
2. No satisfactory alternatives exist
3. Derogation would not be detrimental to the maintenance of a population(s) at a favourable conservation status.

The following sections consider each of these tests in relation to the derogation, which is currently sought.

### 4.2.1 Test 1 – Reason For Derogation

Regulation 54(2) (a)–(e) states that a derogation licence may be granted for any of the reasons listed (a) to (e). In this case, reason (c) as listed below, applies:

*(c) In the interest of public health and public safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment.*

The redevelopment of the site requires the demolition of all buildings on the site with the exception of two protected structures. As described above, the ambition of Limerick Twenty Thirty (LTT) is to revitalise and transform the Cleeves site and surrounding area to deliver a World Class Waterfront development in Limerick’s urban core. The transformative project seeks to achieve a number of primary objectives:

- supporting the growth of a strong local economy;
- encouraging and facilitating new business investment;
- retaining and integrating the historic buildings and site industrial heritage with contemporary buildings;
- accommodating a mix of uses anchored by a public realm that relates and links to the city core and the River Shannon, whilst implementing high-quality urban design, with sustainable and innovative design.

Once fully developed, the site has the potential to accommodate future population growth through residential unit provision and to further promote a strong local economy through the creation of employment and new local attractions, thereby encouraging and facilitating new business investment.

The derelict and dated buildings that currently occupy the site are primarily industrial and/or educational and their retention would preclude the development of the site in line with the overall vision and stated primary objectives. The roosting habitat is spread throughout the site and represents the utilisation of many of the buildings by a small number of bats.

The loss of known roosts and roosting habitat throughout the site along with the potential for disturbance to the roost that is to be retained, has been mitigated so that no significant effects remain. The construction of an ex-situ bat house will enhance roosting habitat in the wider environment, creating important roosting opportunities in Limerick City for bat movement along and across the River Shannon.

This is an important development that could be considered to be in the over-riding public interest for reasons of a social and economic nature.

## 4.2.2 Test 2 – Absence of Alternative Solutions

The development was designed in line with planning development standards to maximise use of its prime location for residential and public realm uses. The development goals have influenced the overall approach to the development proposal from masterplan concept to detailed design, resulting in a development with an acute focus on compact growth and mixed-use brownfield regeneration, adaptive re-use, reversal of vacancy and dereliction and sustainable travel.

The requirement for a derogation was a last resort when considering how to manage protected fauna on the site. The masterplan was constraint led from the outset and the final design was informed by a suite of ecological surveys that were undertaken in advance of and throughout the design process. The ecological surveys identified the areas of greatest importance for biodiversity and the development was designed with this in mind.

In respect of bats, it was noted that the quarry and reservoir sections of the site provided the most suitable habitat for the taxa with existing dark areas and vegetation (that was largely absent from the rest of the site). These are the areas that are currently most utilised by bats. Taking this into account, the development was deliberately designed to replace these habitats. The landscaping and lighting plans

(Appendices 1 and 5) show how the quarry area has been designed to preserve and (where possible) to enhance the existing habitats and connectivity. The scheme was also designed specifically to retain a roost of soprano pipistrelles in the quarry wall. However, the other bat roosts were recorded widely throughout the masterplan site and could not be avoided, whilst still meeting the primary objectives of the development because the buildings are primarily industrial and/or educational, are dated and, in many cases, derelict.

As a result of this, there were no alternatives to the removal of the roosts in the buildings and despite mitigation, the potential for disturbance to the roost being retained could not be excluded given the large scale demolition and construction being proposed.

A do-nothing scenario was also considered. If the proposed development was not to go ahead, the habitats within the site will likely be retained and remain available to bats. However, due to its prominent location within Limerick City, the site is likely to be utilised or redeveloped in some form that would likely result in an alteration of use of the site by the small number that currently use it. Such a scenario where the bat roosts were retained would likely not be supported at national, regional and local policy level for the redevelopment of this city centre location.

Following consultation with NPWS, the construction of an ex-situ bat house was included to enhance availability of roosting habitat for lesser horseshoe bats within the wider environment of Limerick City, in a location well-connected to the existing green and blue infrastructure and less susceptible to potential disturbance than the Cleeves site, whilst still within the urban network in proximity to the site. Other areas in proximity to the Cleeves site were considered before selecting the proposed ex-situ location:

- The Westfield Wetlands, located closer to the Cleeves site, did not provide available space for a construction of this size without encroaching into the wetland habitats, which are part of the SAC. A small area of grassland which did not present habitat associated with the SAC was initially considered, but was determined too public and susceptible to human tampering, as well as being constrained by its location within the SAC, and in an area with little sun exposure.
- Other options in Clonmacken were excluded due to the difficulty of “future-proofing” the locations and maintaining suitable connectivity to the bat house in the event potential future development in lands not owned by LCCC occurs.
- An option adjacent to the existing drains and treelines, approximately 50m south-east of the selected location, was excluded due to the potential for temporary works occurring along the drains and causing disturbance.

## Test 3 – Impact of a Derogation on Conservation Status

The proposed development is not anticipated to affect the conservation status of the species encountered roosting on site due to the small number of individuals affected, the provision of compensatory roosting habitats and other mitigations provided during construction and operation to avoid mortality and limit disturbance.

### **Soprano Pipistrelle**

A small roost (non breeding) of this species, will be lost as a result of the proposed development. However, following the implementation of mitigation as described above, no significant effects resulting from the loss of roosting, foraging or commuting habitat, direct mortality or disturbance, are anticipated.

According to the latest Article 17 reporting (2025), soprano pipistrelle are in favourable conservation status and the granting of this derogation licence will not result in any effect on that status as there will be no reduction in roosting resource and no significant disturbance.

### **Lesser Horseshoe Bat**

A small (non breeding) population of approximately two bats utilises a number of locations throughout the site for roosting. Following the implementation of mitigation as described above, no significant effects resulting from the loss of roosting, foraging or commuting habitat, direct mortality or disturbance, are anticipated.

According to the latest Article 17 reporting (2025), lesser horseshoe bat is in inadequate conservation status. This is found in relation to their range, habitats and future prospects. It is noted that the population of only two bats is afforded National Importance due to the urban location of the population and location within their range. Thus it was important to ensure that roosting, foraging and commuting habitat was retained on the site following the redevelopment. This has been achieved through informed design and bespoke mitigation, as well as the provision of ex-situ roosting habitat. As such, the granting of this derogation licence will not result in any effect on that status as there will be no reduction in roosting resource and no significant disturbance.

## 5. MONITORING

The construction works will be monitored at several levels of seniority as described below to ensure that the environmental best practice prescribed in this document is fully adhered to and is effective. The following system will be put in place to ensure compliance.

### **Contractors Environmental Representative**

An Ecological Clerk of Works (ECoW) will be appointed by the Contractor to ensure that the ecological plan is effectively implemented. The representative will be a suitably qualified ecologist or environmental scientist. All operatives working on the site will be made fully aware of the environmental responsibilities, conditions and requirements along with a full description of the methods to be employed. This information will be imparted at a dedicated site induction prior to commencing work on the site. The induction of any new staff will include an environmental induction. A checklist will be filled in on a weekly basis to show how the measures above have been complied with. Any environmental incidents or non-compliance issues will immediately be reported to the project team and that the project team will take corrective action if necessary. The construction management team will be regularly monitoring the works and will be fully briefed and aware of the environmental constraints and protection measures to be employed. The contractor's environmental representative will work closely with the Employers Environmental Representative as described below.

The ECoW will be responsible for:

- Monitoring the construction works and identifying any additional or refined mitigation measures (i.e. 'adaptive management measures required), in relation to any ecology;
- Reporting the findings of monitoring, including any adaptive management measures recommended and the effectiveness of same;
- Delivering site induction and training on ecological aspects to all construction personnel prior to commencement of construction activities;
- The implementation of ecological mitigation measures
- Updating, renewing and returning the derogation licence in place throughout construction

### **Employers Environmental Representative**

In addition to the above, the employer (Limerick Twenty Thirty), will also provide an employer's environmental representative. This officer will be a suitably qualified ecologist or environmental scientist and will work closely with the contractor's representative to ensure that all environmental/ecological requirements are adhered to and fully monitored. The employer's representative will visit the site on a weekly basis (at a minimum) during the construction phase. An audit of the works will be undertaken during these weekly visits, and it will be ensured that the prescribed methods are employed. Any potential impacts additional to those predicted will be highlighted and if necessary, additional measures put in place to prevent them. Any deviance from the agreed methodology will be highlighted and if necessary rectified. Operational monitoring for biodiversity will include annual surveys for bats to monitor the success of the constructed bat roosts and to ensure that the proposed landscaping and lighting measures are in place and are established and maintained as planned. Monitoring of the bat populations on the site and ex-situ will continue for 5 years following construction and will include activity surveys as well as inspections of the erected bat houses and boxes and other alternative roosting places. The results of the monitoring will be communicated to NPWS in standard reporting format as part of the conditions of the derogation licencing required.

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## CHAPTER TEN LAND, SOILS AND GEOLOGY

### 10.1 INTRODUCTION

This chapter of the Environmental Impact Assessment Report (EIAR) Addendum provides clarifications and amendments to Volume 2, Chapter 10: Land, Soils And Geology of the EIAR submitted as part of the application for approval to An Comisiún Pleanála.

This Addendum is intended to be read in conjunction with Chapter 10.0 of the original EIAR, submitted as part of the application for approval, to ensure a comprehensive understanding of the updates provided in response to the Request for Further Information (RFI).

#### 10.1.1 Details of Competent Experts

In accordance with Article 5(3) of the EIA Directive (2011/92/EU, as amended by 2014/52/EU), the EIAR submitted as part of the planning application, along with this EIAR Addendum, has been prepared by a multi-disciplinary team of competent experts.

Details of all competent experts involved in the preparation of the EIAR are provided in Volume 2, Chapter 1.0 Introduction, of the original EIAR and remain the same for this Chapter of the Addendum EIAR:

### 10.2 REQUEST FOR FURTHER INFORMATION

Chapter 10.0 has been reviewed in the context of the RFI items and to consider the additional information submitted, in particular the consequences of the Bat Derogation License, which necessitates ex situ works by the applicant on other land in their ownership. Further the minor design revisions occurring as a result of the further information response have been reviewed in the context of their potential to alter the predicted impacts to Land, Soils And Geology.

For completeness the full RFI Response has been considered in the preparation of this addendum chapter and where relevant, information from that response has been considered and incorporated as appropriate.

### 10.3 CLARIFICATIONS AND AMENDMENTS

Unless explicitly stated otherwise, the text provided below either replaces, amends, or supplements the corresponding sections within the original EIAR submitted as part of the planning application. All other content in Volume 2, Chapter 10.0 remains unchanged.

#### 10.3.1 Additional Information to Section 10-4 Characteristics of the Proposed Development (Page No. 10-28 of the Original EIAR)

The scope of the assessment area is extended to consider the additional information of the proposed development and is summarised below from Chapter 2.0, Section 2.3.7:

- » **Ecological Measures:** Provision of three dedicated bat houses and an ex-situ dedicated bat house located at Clonmacken some 1.5km west of the Cleeves Site

The groundworks shall entail 'minor localised site levelling within the bat house footprint to accommodate a 3.5 m × 5.0 m reinforced concrete foundation, and a localised sunken below-ground chamber.'

### **10.3.2 Additional Information to Section 10.5.2 Demolition and Construction Phase Effects (Page No. 10-33 of the Original EIAR)**

An ex-situ dedicated bat house located at Clonmacken ca. 1.5km west of the Cleeves Site is ancillary to the current development. It shall entail a small footprint, within very limited groundworks. The location of the bat house does not reside within or close to the scope of any recorded geological heritage sites and no key constraints regarding the receiving land, soils and geology environment have been identified.

The proposed minor design revisions occurring as a result of the further information response will not result in a material change to the conclusions of this EIAR chapter. No additional mitigation measures are required for the proposed minor development changes (including the construction of the proposed ex-situ bat house). Accordingly, there shall be no significant construction or operational impacts, nor shall there be cumulative impacts from the development with respect to Land, Soils and Geology.

## **10.4 IMPLICATIONS FOR THE EIAR**

The amendments set out above do not materially alter the findings, conclusions, or overall assessment presented in Chapter 10.0: (Land, Soils And Geology) of the original EIAR.

## CHAPTER ELEVEN WATER AND HYDROGEOLOGY

### 11.1 INTRODUCTION

This chapter of the Environmental Impact Assessment Report (EIAR) Addendum provides clarifications and amendments to Volume 2, Chapter 11: Water and Hydrogeology of the EIAR submitted as part of the application for approval to An Comisiún Pleanála.

This Addendum is intended to be read in conjunction with Chapter 11.0 of the original EIAR, submitted as part of the application for approval, to ensure a comprehensive understanding of the updates provided in response to the Request for Further Information (RFI).

#### 11.1.1 Details of Competent Experts

In accordance with Article 5(3) of the EIA Directive (2011/92/EU, as amended by 2014/52/EU), the EIAR submitted as part of the planning application, along with this EIAR Addendum, has been prepared by a multi-disciplinary team of competent experts.

Details of all competent experts involved in the preparation of the EIAR are provided in Volume 2, Chapter 11.0 Introduction, of the original EIAR and remain the same for this Chapter of the Addendum EIAR:

### 11.2 REQUEST FOR FURTHER INFORMATION

Chapter 11.0 has been reviewed in the context of the RFI items and to consider the additional information submitted, in particular the consequences of the Bat Derogation License, which necessitates ex situ works by the applicant on other land in their ownership. Further the minor design revisions occurring as a result of the further information response have been reviewed in the context of their potential to alter the predicted impacts to Water and Hydrogeology.

For completeness the full RFI Response has been considered in the preparation of this addendum chapter and where relevant, information from that response has been considered and incorporated as appropriate.

### 11.3 CLARIFICATIONS AND AMENDMENTS

Unless explicitly stated otherwise, the text provided below either replaces, amends, or supplements the corresponding sections within the original EIAR submitted as part of the planning application. All other content in Volume 2, Chapter 11.0 remains unchanged.

#### 11.3.1 Additional Information to Section 11.4 Characteristics of the Proposed Development (Page No. 11-25 of the Original EIAR)

The scope of the assessment area is extended to consider the additional information of the proposed development and is summarised below from Chapter 2.0, Section 2.3.7:

- » **Ecological Measures:** Provision of three dedicated bat houses and an ex-situ dedicated bat house located at Clonmacken some 1.5km west of the Cleeves Site

The groundworks shall entail 'minor localised site levelling within the bat house footprint to accommodate a 3.5 m × 5.0 m reinforced concrete foundation, and a localised sunken below-ground chamber.'

### **11.3.2 Additional Information to Section 11.5.1 Demolition & Construction Effects (Page No. 11-29 of the Original EIAR)**

An ex-situ dedicated bat house located at Clonmacken ca. 1.5km west of the Cleeves Site is ancillary to the current development. It shall entail a small footprint, within very limited groundworks, based on the description provided in Chapter 2.0, this ancillary development is considered to be water compatible. The location of the bat house does not reside within or close to any key constraints regarding the receiving water environment.

The proposed minor design revisions occurring as a result of the further information response will not result in a material change to the conclusions of this EIAR chapter. No additional mitigation measures are required for the proposed minor development changes (including the construction of the proposed ex-situ bat house). Accordingly, there shall be no significant construction or operational impacts, nor shall there be cumulative impacts from the development with respect to Water and Hydrogeology.

## **11.4 IMPLICATIONS FOR THE EIAR**

The amendments set out above do not materially alter the findings, conclusions, or overall assessment presented in Chapter 11.0: (Water and Hydrogeology) of the original EIAR.

## CHAPTER TWELVE THE LANDSCAPE

### 12.1 INTRODUCTION

This chapter of the Environmental Impact Assessment Report (EIAR) Addendum provides clarifications and amendments to Volume 2, Chapter 12.0 The Landscape of the EIAR submitted as part of the application for approval to An Comisiún Pleanála.

This Addendum is intended to be read in conjunction with Chapter 12 of the original EIAR, submitted as part of the application for approval, to ensure a comprehensive understanding of the updates provided in response to the Request for Further Information (RFI).

#### 12.1.1 Details of Competent Experts

In accordance with Article 5(3) of the EIA Directive (2011/92/EU, as amended by 2014/52/EU), the EIAR submitted as part of the planning application, along with this EIAR Addendum, has been prepared by a multi-disciplinary team of competent experts.

Details of all competent experts involved in the preparation of the EIAR are provided in Volume 2, Chapter 1.0 Introduction, of the original EIAR and remain the same for this Chapter of the Addendum EIAR:

### 12.0 REQUEST FOR FURTHER INFORMATION

Chapter 12.0 has been reviewed in the context of the RFI items and to consider the additional information submitted, in particular the consequences of providing an ex-situ bat house and amendments to provide additional tree planting to the northern boundary of the Salesians site and the PBSA site quarry face; minor landscape changes and clarifications in sections; amendments to façade/fenestration to PBSA.

For completeness the full RFI Response has been considered in the preparation of this addendum chapter and where relevant, information from that response has been considered and incorporated as appropriate.

The landscape and visual effects of the minor landscape changes and clarifications in sections and details planting illustrated in the landscape submission are assessed as not significant in the context of The Landscape.

The proposed amendments to the façade/fenestration of the PBSA, are visible to a greater or lesser extent in the verified views no's 1,2,3,19,20 & 22. The limited scope of the changes, at such distances means the changes are not perceptible. The landscape and visual effects of the proposed amendments to the façade/fenestration of the PBSA is assessed as not significant in the context of The Landscape.

## 12.3 CLARIFICATIONS AND AMENDMENTS

The requests for clarification and necessary amendments in relation to Chapter Twelve of the EIA have been addressed in the following sections. Additionally, any identified oversights have been corrected.

Unless explicitly stated otherwise, the text provided below either replaces, amends, or supplements the corresponding sections within the original EIA submitted as part of the planning application. All other content in Volume 2, Chapter Twelve remains unchanged.

### 12.3.1 Insertion of New Section 12.7.4 Mitigation and Response related to RFI (Page No.12-45 of the Original EIA)

A new section Mitigation and Response Related to RFI is to be added to 12.7 Remedial and Mitigation Measures. The revised text below is to be inserted immediately after Section 12.7.3 at the end of the section, and before Section 12.8 Residual Impacts. The addition of Section 12.7.4 does not alter the numbering of any preceding or subsequent sections within the original EIA.

#### *12.7.4 Ex – Situ Works*

An ex-situ bat house is now proposed at a location in Clonmacken, the site for which was selected following detailed consultations with NPWS. The proposed ex situ bat house shall be delivered by Limerick City & County Council in partnership with Limerick Twenty Thirty, in advance of construction works on the Cleeves site. The proposed bat house is as described in Chapter 2, (paragraph 2.3.7 and Figure 2.10) and as set out in drawing no. CRQMP-FCBS-XX-00-DR-AA-0290 P0, (Bat House General Arrangement drawing) prepared by the Architect.

In terms of Landscape and Visual Impact the proposed ex-situ bat house will have no impact on the main proposed development site approx. 1.5km to the east and it cannot be seen in any of the selected verified views submitted with the planning application.

The likelihood of any new or additional effects created by the ex-situ bat house itself has also been assessed in relation to the potential effects on views from Condell Road which runs close to the proposed bat house location. The small scale of the proposed bat house design and the existence of hedgerow and scrub vegetation between the bat house and the roadway reduces any potential for views from the road. In any case, any views which may be obtainable through the occasional gap in the roadside vegetation are likely to be very short-term, fleeting views and of little concern or interest to the passing and predominantly car-travelling public. The landscape and visual effects of the proposed ex-situ bat house are therefore assessed as not significant; indeed they will be barely discernible from the public realm.

## 12.4 IMPLICATIONS FOR THE EIA

The amendments set out above do not materially alter the findings, conclusions, or overall assessment presented in the original EIA.

The proposed amendments have been assessed and are considered to be minor amendments in terms of the likely landscape or visual impact. They will have no discernible effect on the appearance of the scheme from the selected viewpoints.

This additional information supplements the original assessment but does not result in any change to the conclusions reached in the EIAR regarding The Landscape.

## **CHAPTER SEVENTEEN MICROCLIMATE – DAYLIGHT, SUNLIGHT & SHADOW ANALYSIS**

### **17.1 INTRODUCTION**

This chapter of the Environmental Impact Assessment Report (EIAR) Addendum provides clarifications and amendments to Volume 2, Chapter 17: (Microclimate – Daylight, Sunlight & Shadow Analysis) of the EIAR submitted as part of the application for approval to An Comisiún Pleanála.

This Addendum is intended to be read in conjunction with Chapter Seventeen of the original EIAR, submitted as part of the application for approval to ensure a comprehensive understanding of the updates provided in response to the Request for Further Information (RFI).

#### **17.1.1 Details of Competent Experts**

In accordance with Article 5(3) of the EIA Directive (2011/92/EU, as amended by 2014/52/EU), the EIAR submitted as part of the application for approval, along with this EIAR Addendum, has been prepared by a multi-disciplinary team of competent experts.

Details of all competent experts involved in the preparation of the EIAR are provided in Volume 2, Chapter 1.0 Introduction, of the original EIAR and remain the same for this Chapter of the Addendum EIAR.

### **17.2 REQUEST FOR FURTHER INFORMATION**

Chapter Seventeen (Microclimate – Daylight, Sunlight & Shadow Analysis) of the Environmental Impact Assessment Report (EIAR) has been reviewed in the context of the RFI items and to consider the additional information submitted, in particular the consequences of the Bat Derogation License, which necessitates ex situ works by the applicant on other land in their ownership. Further the minor design revisions occurring as a result of the further information response have been reviewed in the context of their potential to alter the predicted impacts to Daylight, Sunlight & Overshadowing.

For completeness, the full RFI Response has been considered in the preparation of this addendum chapter and where relevant, information from that response has been considered and incorporated as appropriate.

### **17.3 CLARIFICATIONS AND AMENDMENTS**

The requests for clarification and necessary amendments in relation to this Chapter have been addressed in the following sections. Additionally, any identified oversights have been corrected.

Unless explicitly stated otherwise, the text provided below either replaces, amends, or supplements the corresponding sections within the original EIAR submitted as part of the planning application. All other content in Volume 2, Chapter Seventeen remains unchanged.

### 17.3.2 Revision to Section 17.4 (Page No. 7 of the Original EIAR)

Section 17.4 has been updated to provide a revised section on the 'Characteristics of the Proposed Development'. The revised text, set out below, replaces the corresponding 'listed bullet point design features' section in the original EIAR.

- *Percentage of apartments, triplexes or townhouses that are dual aspect (or greater) is 47.9%*
- *The amount of Communal Amenity Space provided for the residential plots is 1,506.1sqm (excluding the PBSA and additional provision at Stonetown Terrace to compensate for the reduced provision of private open space serving the houses), some 8.1% more than the recommended minimum of 1,399sqm for 205 apartments and 20 triplex units.*
- *Some 7,817sqm of public open space / public realm is to be provided in the proposals.*
- *Some 78.2% of the residential homes are provided more than 10% in excess of the minimum apartment sizes recommended in the Guidelines (183 out of 234).*

### 17.4 IMPLICATIONS FOR THE EIAR

The amendments set out above do not materially alter the findings, conclusions, or overall assessment presented in Chapter 17: (Microclimate – Daylight, Sunlight & Shadow Analysis) of the original EIAR.

## CHAPTER EIGHTEEN TRAFFIC AND TRANSPORT

### 18.1 INTRODUCTION

This chapter of the Environmental Impact Assessment Report (EIAR) Addendum provides clarifications and amendments to Volume 2, Chapter 18: Traffic and Transport of the EIAR submitted as part of the application for approval to An Comisiún Pleanála.

This Addendum is intended to be read in conjunction with Chapter 18.0 of the original EIAR, submitted as part of the application for approval, to ensure a comprehensive understanding of the updates provided in response to the Request for Further Information (RFI).

#### 18.1.1 Details of Competent Experts

In accordance with Article 5(3) of the EIA Directive (2011/92/EU, as amended by 2014/52/EU), the EIAR submitted as part of the planning application, along with this EIAR Addendum, has been prepared by a multi-disciplinary team of competent experts.

Details of all competent experts involved in the preparation of the EIAR are provided in Volume 2, Chapter 1.0 Introduction, of the original EIAR and remain the same for this Chapter of the Addendum EIAR:

### 18.2 REQUEST FOR FURTHER INFORMATION

Chapter 18.0 has been reviewed in the context of the RFI items and to consider the additional information submitted, in particular the consequences of the Bat Derogation License, which necessitates ex situ works by the applicant on other land in their ownership. Further the minor design revisions occurring as a result of the further information response have been reviewed in the context of their potential to alter the predicted impacts to Traffic and Transport.

For completeness the full RFI Response has been considered in the preparation of this addendum chapter and where relevant, information from that response has been considered and incorporated as appropriate.

### 18.3 CLARIFICATIONS AND AMENDMENTS

Unless explicitly stated otherwise, the text provided below either replaces, amends, or supplements the corresponding sections within the original EIAR submitted as part of the planning application. All other content in Volume 2, Chapter 18.0 remains unchanged.

#### 18.3.1 Additional Information to Section 18.4 Characteristics of the Proposed Development (Page No. 18-23 of the Original EIAR)

The scope of the assessment area is extended to consider the additional information of the proposed development and is summarised below from Chapter 2.0, Section 2.3.4:

- » **Mobility Hub:** The Mobility Hub currently provides for 10 no. car parking spaces and 26 no. temporary car parking spaces pending redevelopment of the site.

The scope of the assessment area is extended to consider the additional information of the proposed development and is summarised below from Chapter 2.0, Section 2.3.6:

- » **Temporary Construction Parking:** The site office and welfare facilities (site compounds) including 36 no. temporary construction parking spaces will be located on the Shipyard site for most phases, with development in the O'Callaghan Strand Zone and in the Quarry Zone accommodating independent site compounds, following construction of the Mobility Hub within the Shipyard site.

The quantum of temporary car parking proposed reflects the number of parking spaces to be provided in the Shipyard site at operational stage, and which has been fully assessed for the purposes of the Traffic & Transport Assessment. Further, it is generally presumed that construction staff arrival/departure times does not coincide with the network peak.

The scope of the assessment area is extended to consider the additional information of the proposed development and is summarised below from Chapter 2.0, Section 2.3.7:

- » **Ecological Measures:** Provision of three dedicated bat houses and an ex-situ dedicated bat house located at Clonmacken some 1.5km west of the Cleaves Site

The groundworks shall entail 'minor localised site levelling within the bat house footprint to accommodate a 3.5 m × 5.0 m reinforced concrete foundation, and a localised sunken below-ground chamber.'

### **18.3.2 Additional Information to Section 18.4.6.1 Characteristics of the Proposed Development (Page No. 18-40 of the Original EIAR)**

The number of standard car parking spaces at Stonetown Terrace has been updated to 12no., instead of 14no., in Table 18-1 and in the associated text within this section of the assessment.

### **18.3.3 Additional Information to Section 18.4.6.5 Characteristics of the Proposed Development (Page No. 18-41 of the Original EIAR)**

Table 18-2 (Total parking provision for the proposed development) has been updated with a total of 116 spaces, instead of a total of 118 spaces, as per Table 4-2 in the Traffic & Transport Assessment below confirming parking numbers in Shipyard area.

**Table 4-2 Total parking provision for the proposed development**

Use / Zone		Car Parking		
		Standard Spaces	Accessible Spaces	Total Spaces
Residential	Salesians	45	4	49
	Stonetown Terrace	12	2	14
	O'Callaghan Strand	4	1	5
Student residential	Quarry PBSA	6	2	8
Dedicated residential / PBSA car club	Shipyard	9	1	10
Visitor	Shipyard	24	2	26*
Creche	Salesians	3**	1	4
<b>Total</b>				<b>116</b>
* temporary parking spaces				
** includes 2 parent and child spaces				

**18.3.4 Additional Information to Section 18.5.1 Construction Phase Effects (Page No. 18-43 of the Original EIAR)**

An ex-situ dedicated bat house located at Clonmacken ca. 1.5km west of the Cleeves Site is ancillary to the current development. It shall entail a small footprint, within very limited groundworks. The location of the bat house does not reside within or close to any key constraints regarding the receiving traffic environment.

The proposed minor design revisions occurring as a result of the further information response will not result in a material change to the conclusions of this EIAR chapter. No additional mitigation measures are required for the proposed minor development changes (including the construction of the proposed ex-situ bat house). Accordingly, there shall be no significant construction or operational impacts, nor shall there be cumulative impacts from the development with respect to Traffic and Transport.

**18.3.5 Additional Information to Section 18.7 Construction Phase Mitigation (Page No. 18-50 of the Original EIAR)**

The following text has been removed from this section, as it is not relevant to the assessment  
~~‘Once construction of the Proposed Development is completed, all machinery and equipment will be removed and hard standing within the Solar Farm site excavated. The area will be regraded with the stockpiled topsoil to a natural profile. Road surfaces, road markings, etc. will be fully reinstated as is and in such a manner that there is no change to the operation of the local road network.’~~

**18.3.6 Additional Information to Section 18.3.2 Existing Receiving Environment (Page No. 18-3 of the Original EIAR) to Section 18.6.5 Cumulative Impacts (Page No. 18-49 of the Original EIAR)**

The following typo has been corrected throughout the assessment. An ‘error’ reference appears from Section 18.3.2 Existing Receiving Environment (Page No. 18-3 of the Original EIAR) to Section 18.6.5 Cumulative Impacts (Page No. 18-49 of the Original EIAR). In all cases this ‘error’ reference refers to the relevant table / figure which appears directly below / above the descriptive text with the ‘error’ reference.

Page	Section	Original Wording	Corrected Wording
18-3	18.3.2	The road network surrounding the site is made up of regional and local roads, as shown in Figure 18.3Error! Reference source not found.and described below:	The road network surrounding the site is made up of regional and local roads, as shown in Figure 18.3 <del>Error! Reference source not found.</del> and described below:
18-25	18.4.3.1	Most car trips are expected to originate from the west of the proposed development, whereas the majority of expected pedestrian and cyclist trips are expected from the east (see Error! Reference source not found.18.26 below).	Most car trips are expected to originate from the west of the proposed development, whereas the majority of expected pedestrian and cyclist trips are expected from the east (see <del>Error! Reference source not found.</del> 18.26 below).
18-39	18.4.6.1	The parking provision for each residential zone, including both standard and accessible spaces, is shown in Error! Reference source not found. below.	The parking provision for each residential zone, including both standard and accessible spaces, is shown in <del>Error! Reference source not found.</del> Table 18-1 below.
18-40	18.4.6.5	The total car parking provision for the proposed development, including residential, PBSA, visitor and creche parking is 118 spaces, as shown in Error! Reference source not found. below	The total car parking provision for the proposed development, including residential, PBSA, visitor and creche parking is 118 spaces, as shown in <del>Error! Reference source not found</del> Table 18-2 below
18-42	18.5.1.2	The construction traffic flows through the Salesians roundabout during the AM and PM peak periods as shown in Error! Reference source not found. below.	The construction traffic flows through the Salesians roundabout during the AM and PM peak periods as shown in <del>Error! Reference source not found.</del> Table 18-3 below.”
18-42	18.5.1.2	Person trip rates for both student accommodation and residential units have been obtained from TRICS and are shown in Error! Reference source not found. below.	Person trip rates for both student accommodation and residential units have been obtained from TRICS and are shown in <del>Error! Reference source not found.</del> Table 18-4 below.
18-42	18.5.2.1	Applying the resident numbers to the TRICS person trip rates results in the person trips included in Error! Reference source not found. below.	Applying the resident numbers to the TRICS person trip rates results in the person trips included in <del>Error! Reference source not found.</del> Table 18-5 below.
18-43	18.5.2.1	his results in a total residential trip generation of 21 trips during the AM peak and 28 trips during the PM peak, as shown in Error! Reference source not found..	his results in a total residential trip generation of 21 trips during the AM peak and 28 trips during the PM peak, as shown in <del>Error! Reference source not found.</del> Table 18-6.
18-43	18.5.2.1	The mobility hub within the Shipyard Zone will include 26 visitor spaces as noted in Error! Reference source not found..	The mobility hub within the Shipyard Zone will include 26 visitor spaces as noted in <del>Error! Reference source not found.</del> Table 18-2
18-43	18.5.2.1	the available capacity of the visitor parking provided for the proposed development results in the expected visitor trip generation provided in Error! Reference source not found. below.	the available capacity of the visitor parking provided for the proposed development results in the expected visitor trip generation provided in <del>Error! Reference source not found.</del> Table 18-7 below.

18-43	18.5.2.1	The resultant peak hour trips based on the residential and visitor generation is outlined in Error! Reference source not found	The resultant peak hour trips based on the residential and visitor generation is outlined in <del>Error! Reference source not found</del> Table 18-8
18-44	18.5.2.2	This represents an overall decrease in traffic on the road network surrounding the site during peak times as shown in Error! Reference source not found. below.	This represents an overall decrease in traffic on the road network surrounding the site during peak times as shown in <del>Error! Reference source not found</del> . Table 18-9 below.
18-44	18.5.2.2	This change in traffic corresponds to a reduction of 2% when considering the total traffic volumes at the roundabout during the AM peak and a reduction of 1% in total traffic volumes during the PM peak as shown in Error! Reference source not found..	This change in traffic corresponds to a reduction of 2% when considering the total traffic volumes at the roundabout during the AM peak and a reduction of 1% in total traffic volumes during the PM peak as shown in <del>Error! Reference source not found</del> . Table 18-10.
18-46	18.6.5	The Euro Car Parks trip generation during AM and PM peak periods has been determined using the baseline traffic data (Section 18.3.7), presented in Error! Reference source not found. below.	The Euro Car Parks trip generation during AM and PM peak periods has been determined using the baseline traffic data (Section 18.3.7), presented in <del>Error! Reference source not found</del> . Table 18-11 below.
18-46	18.6.5	The Phase IV trip generation is shown in Error! Reference source not found. below.	The Phase IV trip generation is shown in <del>Error! Reference source not found</del> . Table 18-12 below.
18-47	18.6.6	This change in traffic corresponds to a 4% increase in total traffic volumes during the AM and PM peaks as compared to baseline traffic flows as shown in Error! Reference source not found. below.	This change in traffic corresponds to a 4% increase in total traffic volumes during the AM and PM peaks as compared to baseline traffic flows as shown in <del>Error! Reference source not found</del> . Table 18-13 below.
18-47	18.6.6	This change in traffic corresponds to a 4% increase in total traffic volumes during the AM and PM peaks as compared to baseline traffic flows as shown in Error! Reference source not found. below.	This change in traffic corresponds to a 4% increase in total traffic volumes during the AM and PM peaks as compared to baseline traffic flows as shown in <del>Error! Reference source not found</del> . Table 18-14 below.
18-48	18.6.6	For the purposes of this assessment, Salesians Roundabout can be considered to be sensitive as it is located near quays and subject to the 5% threshold. Based on the Error! Reference source not found. above, the additional trips due to full masterplan is less than 5% of the baseline traffic.	For the purposes of this assessment, Salesians Roundabout can be considered to be sensitive as it is located near quays and subject to the 5% threshold. Based on the <del>Error! Reference source not found</del> . Table 18-14 above, the additional trips due to full masterplan is less than 5% of the baseline traffic.

#### 18.4 IMPLICATIONS FOR THE EIAR

The amendments set out above do not materially alter the findings, conclusions, or overall assessment presented in Chapter 18: (Traffic and Transport) of the original EIAR.

## CHAPTER NINETEEN MATERIAL ASSETS - WASTE MANAGEMENT

### 19.1 INTRODUCTION

This chapter of the Environmental Impact Assessment Report (EIAR) Addendum provides clarifications and amendments to Volume 2, Chapter 19: Material Assets – Waste Management of the EIAR submitted as part of the application for approval to An Comisiún Pleanála.

This Addendum is intended to be read in conjunction with Chapter 19.0 of the original EIAR, submitted as part of the application for approval, to ensure a comprehensive understanding of the updates provided in response to the Request for Further Information (RFI).

#### 19.1.1 Details of Competent Experts

In accordance with Article 5(3) of the EIA Directive (2011/92/EU, as amended by 2014/52/EU), the EIAR submitted as part of the planning application, along with this EIAR Addendum, has been prepared by a multi-disciplinary team of competent experts.

Details of all competent experts involved in the preparation of the EIAR are provided in Volume 2, Chapter 1.0 Introduction, of the original EIAR and remain the same for this Chapter of the Addendum EIAR:

### 19.2 REQUEST FOR FURTHER INFORMATION

Chapter 19.0 has been reviewed in the context of the RFI items and to consider the additional information submitted, in particular the consequences of the Bat Derogation License, which necessitates ex situ works by the applicant on other land in their ownership. Further the minor design revisions occurring as a result of the further information response have been reviewed in the context of their potential to alter the predicted impacts to Material Assets – Waste Management.

For completeness the full RFI Response has been considered in the preparation of this addendum chapter and where relevant, information from that response has been considered and incorporated as appropriate.

### 19.3 CLARIFICATIONS AND AMENDMENTS

Unless explicitly stated otherwise, the text provided below either replaces, amends, or supplements the corresponding sections within the original EIAR submitted as part of the planning application. All other content in Volume 2, Chapter 19.0 remains unchanged.

#### 19.3.1 Additional Information to Section 19-4 Characteristics of the Proposed Development (Page No. 19-9 of the Original EIAR)

The scope of the assessment area is extended to consider the additional information of the proposed development and is summarised below from Chapter 2.0, Section 2.3.7:

- » **Ecological Measures:** Provision of three dedicated bat houses and an ex-situ dedicated bat house located at Clonmacken some 1.5km west of the Cleeves Site

The groundworks shall entail 'minor localised site levelling within the bat house footprint to accommodate a 3.5 m × 5.0 m reinforced concrete foundation, and a localised sunken below-ground chamber.'

The scope of the assessment area is extended to consider the additional information of the proposed development and is summarised below from Chapter 2.0, Section 2.3.1:

- » **Development Statistics:** Creche Area - Capacity for 36 no. children

There will be no change to the total number of proposed residential units (as confirmed in Table 7.1, Chapter 2.0, Section 2.3.1).

### **19.3.2 Additional Information to Section 19.5.3 Demolition and Construction Phase Impacts (Page No. 19-13 of the Original EIAR)**

An ex-situ dedicated bat house located at Clonmacken ca. 1.5km west of the Cleeves Site is ancillary to the current development. It shall entail a small footprint, within very limited groundworks.

### **19.3.3 Additional Information to Section 19.5.4 Operational Phase Impacts (Page No. 19-14 of the Original EIAR)**

There will be no change to the total number of proposed residential units (as confirmed in Table 7.1, Chapter 2.0, Section 2.3.1). The capacity for 36no. children within the proposed creche will not result in increased waste volumes during the operational phase of the proposed development.

The proposed minor design revisions occurring as a result of the further information response will not result in a material change to the conclusions of this EIAR chapter. No additional mitigation measures are required for the proposed minor development changes (including the construction of the proposed ex-situ bat house). Accordingly, there shall be no significant construction or operational impacts, nor shall there be cumulative impacts from the development with respect Material Assets – Waste Management.

## **19.4 IMPLICATIONS FOR THE EIAR**

The amendments set out above do not materially alter the findings, conclusions, or overall assessment presented in Chapter 19.0: (Material Assets – Waste Management) of the original EIAR.

## CHAPTER TWENTY THREE SUMMARY OF MITIGATION MEASURES

### 23.1 INTRODUCTION

This chapter of the Environmental Impact Assessment Report (EIAR) Addendum provides clarifications and amendments to Volume 2, Chapter 23.0 Summary of Mitigation Measures of the EIAR submitted as part of the application for approval to An Comisiún Pleanála.

This Addendum is intended to be read in conjunction with Chapter 23.0 of the original EIAR, submitted as part of the application for approval, to ensure a comprehensive understanding of the updates provided in response to the Request for Further Information (RFI).

#### 23.1.1 Details of Competent Experts

In accordance with Article 5(3) of the EIA Directive (2011/92/EU, as amended by 2014/52/EU), the EIAR submitted as part of the application for approval, along with this EIAR Addendum, has been prepared by a multi-disciplinary team of competent experts.

Details of all competent experts involved in the preparation of the EIAR are provided in Volume 2, Chapter 1.0 Introduction, of the original EIAR and remain the same for this Chapter of the Addendum EIAR.

### 23.2 REQUEST FOR FURTHER INFORMATION

Chapter 23.0 has been reviewed in the context of the RFI items and to consider the additional information submitted, in particular the consequences of the Bat Derogation License, which necessitates ex situ works by the applicant on other land in their ownership. Further the minor design revisions occurring as a result of the further information response have been reviewed and detailed in this chapter.

For completeness the full RFI Response has been considered in the preparation of this addendum chapter and where relevant, information from that response has been considered and incorporated as appropriate.

### 23.3 CLARIFICATIONS AND AMENDMENTS

Unless explicitly stated otherwise, the text provided below either replaces, amends, or supplements the corresponding sections within the original EIAR submitted as part of the planning application. All other content in Volume 2, Chapter 23.0 remains unchanged.

**23.3.1 Additional Bullet Point to Section 23.2.2 (Page No. 23-1 of the Original EIAR)**

- As per Bat Derogation License, Derogation Number DER-BAT-2026-201 an ex situ bat house shall be delivered by Limerick City & County Council in partnership with Limerick Twenty Thirty, in advance of construction works on the Cleeves site, on lands at Clonmacken, Limerick, located approximately 1.5km to the west of the Cleeves site

**23.3.2 Update and Additional Mitigation Measure to Section 23.3.2.3(e) (Page No. 23-6 of the Original EIAR)**

A derogation licence from the NPWS ~~will be in place for the project~~ has been granted for the development, Derogation Number DER-BAT-2026-201. The derogation licence is issued by NPWS on a yearly basis, and therefore it is expected that multiple licences will be necessary. Each licence will be informed by monitoring undertaken at the site and will be specific to the works to be undertaken during the calendar year. NPWS will be informed of any progress made during construction with regular updates.

- r. An ex situ bat house shall be delivered by Limerick City & County Council in partnership with Limerick Twenty Thirty, as per the permitted Bat Derogation License, in advance of construction works on the Cleeves site, on lands at Clonmacken, Limerick, located approximately 1.5km to the west of the Cleeves site

**23.3.3 Correction to Section 23.3.8.6 (Page No. 23-18 of the Original EIAR)**

- a. Vibration from construction activities will be limited to the values set out in ~~Error! Reference source not found.~~ Table 13.4 of this EIAR to avoid any form of potential cosmetic damage to buildings and structures.
- b. In order to minimise any potential impacts to adjacent building occupants, the following measures shall be implemented during the Construction Phase.
  - A clear communication programme will be established by contractor to inform adjacent building occupants in advance of any potential intrusive works which may give rise to vibration levels likely to result in significant effects as per ~~Error! Reference source not found.~~. The nature and duration of the works will be clearly set out in all communication circulars as necessary; and
  - Appropriate vibration isolation will be applied to plant (such as resilient mounts to pumps and generators), where required and where feasible

**23.3.4 Additional Bullet Point to Section 23.5.1 (Page No. 23-28 of the Original EIAR)**

- Future use of the bat house will be monitored so that any potential problems preventing or limiting usage may be addressed in consultation with NPWS.

**23.3.5 Correction to Section 23.5.8 Fourth Bullet Point (Page No. 23-30 of the Original EIAR)**

- Monitoring of construction dust deposition along the site boundary to nearby sensitive receptors (as identified in Section 14.3.3 ~~Error! Reference source not found.~~) during the construction phase of the proposed development is recommended to ensure mitigation measures are working satisfactorily. This can be carried out using the Bergerhoff method in accordance with the requirements of the German Standard VDI 2119. The Bergerhoff Gauge consists of a collecting

vessel and a stand with a protecting gauge. The collecting vessel is secured to the stand with the opening of the collecting vessel located approximately 2m above ground level. The TA Luft limit value is 350 mg/m<sup>2</sup>/day during the monitoring period of 30 days (+/- 2 days). Monitoring shall ensure that the dust mitigation measures are working satisfactorily as construction works progress.

#### **23.4 IMPLICATIONS FOR THE EIAR**

The measures set out in this chapter collate the mitigation and monitoring measures as presented in the EIAR. Accordingly, the amendments, clarifications and additional mitigation measures set out above do not materially alter the findings or conclusions of this chapter.