

Noreen McLoughlin, MSc

Environmental Consultant

Whitehill
Edgeworthstown
Co. Longford
☎ (087) 4127248 / (043) 6672775
✉ noreen.mcloughlin@gmail.com

STATEMENT OF SCREENING FOR APPROPRIATE ASSESSMENT OF A PROPOSED DEVELOPMENT AT DOMINICK STREET (LADY'S LANE / HUNTS LANE), LIMERICK CITY



Lanehunt Ltd
c/o AK Planning and Development Ltd
Millside
Mill Road
Corbally
Limerick

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TABLE OF CONTENTS

1	INTRODUCTION	3
1.1	Background.....	3
1.2	Regulatory Context.....	3
2	METHODOLOGY	7
2.1	Appropriate Assessment.....	7
2.2	Statement of Competency.....	9
2.3	Desk Studies & Consultation.....	9
2.4	Assessment Methodology.....	10
3	SCREENING	11
3.1	Development Description	11
3.2	Site Location and Surrounding Environment	15
3.3	Natura 2000 Sites Identified.....	19
3.4	Impact Assessment	33
3.5	Finding of No Significant Effects.....	37
4	APPROPRIATE ASSESSMENT CONCLUSION	38

1 INTRODUCTION

1.1 BACKGROUND

Article 6 of the EU Habitat's Directive (Council Directive 92/43/EEC) requires that all plans and projects be screened for potential impacts upon Special Areas of Conservation (SACs) or Special Protection Areas (SPAs). The aim of this screening process is to establish whether or not a full Appropriate Assessment of the proposed plan or project is necessary

A comprehensive assessment of the potential significant effects of a proposed development (Purpose Built Student Accommodation) at Dominick Street (Lady's Lane / Hunts Lane), Limerick City on certain designated sites was carried out in March 2026 by Noreen McLoughlin, MSc, MCIEEM of Whitehill Environmental. This report has been prepared to assist Limerick City and County Council, as the Competent Authority, in carrying out its duties under Article 6(3) of the Habitats Directive.

The location of the proposed development is within 15km of sites designated under European Law. As such and in accordance with Article 6(3) of the EU Habitat's Directive (Council Directive 92/43/EEC) regarding Appropriate Assessment, this screening exercise for Appropriate Assessment was carried out in order to identify whether any significant effects on designated sites are likely, when considered on their own or in combination with other plans and projects. This exercise will also determine the appropriateness of the proposed project, in the context of the conservation status of the designated sites.

1.2 REGULATORY CONTEXT

The Birds Directive (Council Directive 2009/147/EC) recognises that certain species of birds should be subject to special conservation measures concerning their habitats. The Directive requires that Member States take measures to classify the most suitable areas as Special Protection Areas (SPAs) for the conservation of bird species listed in Annex 1 of the Directive. SPAs are selected for bird species (listed in Annex I of the Birds Directive), that are regularly occurring populations of migratory bird species and the SPA areas are of international importance for these migratory birds.

The EU Habitats Directive (92/43/EEC) requires that Member States designate and ensure that particular protection is given to sites (Special Areas of Conservation) which are made up of or support particular habitats and species listed in annexes to this Directive.

Articles 6(3) and 6(4) of this Directive also call for the undertaking of an Appropriate Assessment for plans and projects not directly connected with or necessary to the management of, but which are likely to have a significant effect on any European designated sites (i.e. SACs and SPAs).

The Water Framework Directive (WFD) (2000/60/EC), which came into force in December 2000, establishes a framework for community action in the field of water policy. The WFD was transposed into Irish law by the European Communities (Water Policy) Regulations 2003 (S.I. 722 of 2003). The WFD rationalises and updates existing legislation and provides for water management on the basis of River Basin Districts (RBDs). RBDs are essentially administrative areas for coordinated water management and are comprised of multiple river basins (or catchments), with cross-border basins (i.e. those covering the territory of more than one Member State) assigned to an international RBD. The aim of the WFD is to ensure that waters achieve at least good status by 2027 and that status does not deteriorate in any waters.

Appropriate Assessment and the Habitats Directive

Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora – the 'Habitats Directive' - provides legal protection for habitats and species of European importance. Article 2 of the Directive requires the maintenance or restoration of habitats and species of European Community interest, at a favourable conservation status. Articles 3 - 9 provide the legislative means to protect habitats and species of Community interest through the establishment and conservation of an EU-wide network of sites known as *Natura 2000*. Natura 2000 sites are Special Areas of Conservation (SACs) designated under the Habitats Directive and Special Protection Areas (SPAs) designated under the Conservation of Wild Birds Directive (79/409/EEC).

Articles 6(3) and 6(4) of the Habitats Directive sets out the decision-making tests for plans or projects affecting Natura 2000 sites. Article 6(3) establishes the requirement for Appropriate Assessment:

"Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will

not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.”

Article 6(4) deals with the steps that should be taken when it is determined, as a result of appropriate assessment, that a plan/project will adversely affect a European site. Issues dealing with alternative solutions, imperative reasons of overriding public interest and compensatory measures need to be addressed in this case.

Article 6(4) states:

“If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of a social or economic nature, the Member States shall take all compensatory measures necessary to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted.

Where the site concerned hosts a priority natural habitat type and/or a priority species, the only considerations which may be raised are those relating to human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest.”

The Appropriate Assessment Process

The aim of Appropriate Assessment is to assess the implications of a proposal in respect of a designated site’s conservation objectives.

The ‘Appropriate Assessment’ itself is an assessment which must be carried out by the competent authority which confirms whether the plan or project in combination with other plans and projects will have an adverse impact on the integrity of a European site.

Screening for Appropriate Assessment shall be carried out by the competent authority as set out in Section 177U(1) and (2) of the Planning and Development Act 2000 (as amended) as follows:

‘(1) A screening for appropriate assessment of a draft Land use plan or application for consent for proposed development shall be carried out by the competent authority to assess, in view of best scientific knowledge, if that Land use plan or proposed development, individually or in combination with another plan or project is likely to have a significant effect on the European site.

(2) A competent authority shall carry out a screening for appropriate assessment under subsection (1) before—

(a) a Land use plan is made including, where appropriate, before a decision on appeal in relation to a draft strategic development zone is made, or

(b) consent for a proposed development is given.’

The competent authority shall determine that an Appropriate Assessment is not required if it can be excluded, that the proposed development, individually or in combination with other plans or project will have a significant effect on a European site.

Where the competent authority cannot exclude the potential for a significant effect on a European site, an Appropriate Assessment shall be deemed required.

Where an Appropriate Assessment is required, the conclusions of the Appropriate Assessment Report (Natura Impact Statement (NIS)) should enable the competent authority to ascertain whether the plan or proposed development would adversely affect the integrity of the European site. If adverse impacts on the integrity of a European site cannot be avoided, then mitigation measures should be applied during the appropriate assessment process to the point where no adverse impacts on the site remain. Under the terms of the Habitats Directive consent can only be granted for a project if, as a result of the appropriate assessment either (a) it is concluded that the integrity of any European sites will not be adversely affected, or (b) after mitigation, where adverse impacts cannot be excluded, there is shown to be an absence of alternative solutions, and there exists imperative reasons of overriding public interest for the project should go ahead.

Section 177(V) of the Planning and Development Act 2000 (as amended) outlines that the competent authority shall carry out the Appropriate Assessment, taking into account the Natura Impact Statement (amongst any other additional or supplemental information). A determination shall then be made by the competent authority in line with the requirements of Article 6(3) of the Habitats Directive as to whether the plan or proposed development would adversely affect the integrity of a European site, prior to consent being given.

2 METHODOLOGY

2.1 APPROPRIATE ASSESSMENT

This Statement of Screening for Appropriate Assessment (Stage 1) has been prepared with reference to the following:

- European Commission (2018). Managing Natura 2000 Sites: The Provisions of Article 6 of the 'Habitats' Directive 92/43/EEC.
- European Commission (2021). Assessment of Plans and Projects Significantly Affecting Natura 2000 sites: Methodological Guidance on the Provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC.
- European Commission (2006). Nature and Biodiversity Cases: Ruling of the European Court of Justice.
- European Commission (2007). Clarification of the Concepts of: Alternative Solution, Imperative Reasons of Overriding Public Interest, Compensatory Measures, Overall Coherence, Opinion of the Commission.
- Department of Environment, Heritage and Local Government (2009). Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities.
- The AA has also been undertaken in consideration of the European Union (CJEU) judgment on Case C323/17 (People over Wind, Peter Sweetman v Coillte Teoranta), which concluded that "it is not appropriate, at the screening stage, to take account of the measures intended to avoid or reduce the harmful effects [mitigation] of the plan or project on that site.". Other caselaw relevant to Screening are Waddenzee (C127/02), Holohan and Others v An Bord Pleanála (C461/17) and Court of Appeal case C1/2009/0041/QBACF Citation No [2009] EWCA Civ. 1061.
- Most recent and pertinent case law pertaining to AA screening comes from *Eco Advocacy v. An Bord Pleanála* Case C-721/21. This case recently determined that "standard design measures" can be included at design stage if they are an inherent part of the plan, namely a measure: *'incorporated into that plan or project as standard features, inherent in such a plan or project, irrespective of any effect on the site'*.

The EC Guidance sets out a number of principles as to how to approach decision making during the process. The primary one is 'the precautionary principle' which requires that the conservation objectives of Natura 2000 should prevail where there is uncertainty.

When considering the precautionary principle, the emphasis for assessment should be on objectively demonstrating with supporting evidence that:

- There will be no significant effects on a Natura 2000 site;
- There will be no adverse effects on the integrity of a Natura 2000 site;
- There is an absence of alternatives to the project or plan that is likely to have an adverse effect to the integrity of a Natura 2000 site; and
- There are compensation measures that maintain or enhance the overall coherence of Natura 2000.

This translates into a four stage process to assess the impacts, on a designated site or species, of a policy or proposal.

The EC Guidance states that “each stage determines whether a further stage in the process is required”. Consequently, the Council may not need to proceed through all four stages in undertaking the Appropriate Assessment.

The four-stage process is:

Stage 1: Screening – The process which identifies the likely impacts upon a Natura 2000 site of a project or plan, either alone or in combination with other projects or plans, and considers whether or not these impacts are likely to be significant;

Stage 2: Appropriate Assessment – The consideration of the impact on the integrity of the Natura 2000 site of the project or plan, either alone or in combination with other projects or plans, with respect to the site’s structure and function and its conservation objectives. Additionally, where there are adverse impacts, an assessment of the potential mitigation of those impacts;

Stage 3: Assessment of Alternative Solutions – The process which examines alternative ways of achieving objectives of the project or plan that avoid adverse impacts on the integrity of the Natura 2000 site;

Stage 4: Assessment where no alternative solutions exist and where adverse impacts remain – An assessment of the compensatory measures where, in the light of an assessment of imperative reasons of overriding public interest (IROPI), it is deemed that the project or plan should proceed.

In complying with the obligations set out in Articles 6(3) and following the guidelines described above, this screening statement has been structured as a stage by stage approach as follows:

- Description of the proposed project;

- Identification of the Natura 2000 sites close to the proposed development;
- Identification and description of any individual and cumulative impacts on the Natura 2000 sites likely to result from the project;
- Assessment of the significance of the impacts identified above on site integrity. Exclusion of sites where it can be objectively concluded that there will be no significant effects.

2.2 STATEMENT OF COMPETENCY

This AA Screening report was carried out by Noreen McLoughlin, BA, MSc, MCIEEM. Noreen has an honours degree in Zoology and an MSc in Freshwater Ecology from Trinity College, Dublin and she has been a full member of the Chartered Institute of Ecology and Environmental Management for over twenty years. Noreen has over 22 years' experience as a professional ecologist in Ireland.

2.3 DESK STUDIES & CONSULTATION

Information on the site and the area of the proposed development was studied prior to the completion of this statement. The following data sources were accessed in order to complete a thorough examination of potential impacts:

- National Parks and Wildlife Service - Aerial photographs and maps of designated sites, information on habitats and species within these sites and information on protected plant or animal species, conservation objectives, site synopses and standard data forms for relevant designated sites.
- Environmental Protection Agency (EPA)- Information pertaining to water quality, geology and licensed facilities within the area;
- Myplan.ie – Mapped based information;
- National Biodiversity Data Centre (NBDC) – Information pertaining to protected plant and animal species within the study area;
- Bing maps & Google Street View – High quality aerials and street images;
- AK Planning and Development Ltd / JFA Architects – Plans and Information Pertaining to the Development
- Limerick City Council – Information on planning history in the area for the assessment of cumulative impacts.

2.4 ASSESSMENT METHODOLOGY

The proposed development was assessed to identify its potential ecological impacts and from this, the Zone of Influence (Zoi) of the proposed development was defined. Based on the potential impacts and their Zoi, the Natura 2000 sites potentially at risk from direct, indirect or in-combination impacts were identified. The assessment considered all potential impact sources and pathways connecting the proposed development to Natura 2000 sites, in view of the conservation objectives supporting the favourable conservation condition of the site's Qualifying Interests (QIs) or Special Conservation Interests (SCIs).

The conservation objectives relating to each Natura 2000 site and its QIs/SCIs are cited generally for SACs as "to maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or Annex II species for which the SAC has been selected", and for SPAs "to maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA".

As defined in the Habitat's Directive, the favourable conservation status of a habitat is achieved when:

- Its natural range and area it covers within that range is stable or increasing;
- The specific structure and functions which are necessary for its long-term maintenance exist and are likely to continue to exist for the foreseeable future;

The favourable conservation status of a species is achieved when:

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

Where site-specific conservation objectives (SSCOs) have been prepared for a European site, these include a series of specific attributes and targets against which effects on conservation condition, or integrity, can be measured. Where potential significant effects are identified, then these SSCO's should be considered in detail.

3 SCREENING

3.1 DEVELOPMENT DESCRIPTION

Lanehunt Ltd are applying to Limerick City and County Council for planning permission for a development (Purpose Built Student Accommodation) on a circa 0.19ha site at Dominick Street (Lady's Lane / Hunt's Lane), Limerick. Planning permission is being sought here for the following:

Permission is sought for the construction of Purpose Built Student Accommodation (PBSA) at Dominick Street, (Lady's Lane/Hunts Lane), Limerick. The development will comprise a single block of eight storeys providing 350 student bedspaces arranged in clusters with shared kitchens and living rooms and with a gross internal area of 9,360 m². Communal facilities will include a café, gym, cinema, study rooms, laundry, and indoor and covered outdoor bicycle storage for 185 spaces. A total of 1,360 m² of amenity space will be provided, comprising 545 m² of landscaped outdoor courtyards and rooftop terraces and 815 m² of indoor communal areas. Supporting infrastructure at ground floor level will include plant rooms, refuse storage and collection areas, service zones, and a dedicated ESB substation. The development will be accessed on a pedestrian and cycle priority basis, with zero car parking. Permission is also sought for use of the accommodation, outside of student term time, for short-term letting purposes. All associated site development works, including drainage, water supply, and sustainable urban drainage systems, will be provided.

An extract from the planning drawings as submitted is shown in Figure 1.

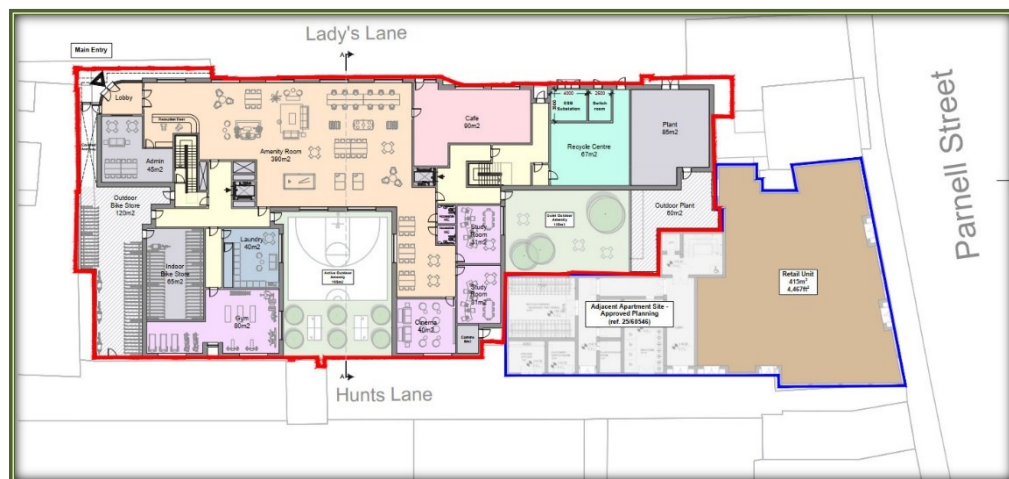


Figure 1a – Extract from Planning Drawings, Ground Floor Plan (as prepared by JFA Architects)



Figure 1b – Proposed Aerial View (as prepared by JFA Architects)



Figure 1c – Proposed Visual (as prepared by JFA Architects)

Proposed Stormwater Drainage

Details regarding the management of storm water from the site have been provided in the accompanying Engineering Report which has been prepared by BDB Consulting Engineers.

The proposed surface water drainage system has been designed in accordance with established best practice and relevant standards, including I.S. EN 12056:2000, I.S. EN 752:2017, the Greater Dublin Region Code of Practice for Drainage Works, the Greater Dublin Strategic Drainage Study (GDSDS), and CIRIA SuDS Manual C753. Hydraulic modelling has been undertaken for a range of return periods, including the 1 in 5-year event for pipe design, the 1 in 30-year event to ensure no flooding within the drainage network, and the 1 in 100 year event plus a 30% climate change allowance to ensure protection of properties. The modelling confirms that the network will operate without flooding for events up to the 1 in 30-year return period, with exceedance events managed appropriately. Greenfield runoff rates have been calculated using the IH124 method, and discharge from the site will be restricted via flow control devices to approximately 1.5 l/s, ensuring that post-development runoff does not exceed the equivalent greenfield rate and will not increase flood risk downstream.

The overall drainage strategy is based on Sustainable Drainage Systems (SuDS) principles, following the hierarchy of source control, site control and regional control measures to manage surface water runoff in a holistic manner. Surface water will be attenuated and treated at source and progressively through the site prior to discharge to the existing network. The design incorporates a blue roof system to provide primary attenuation and reduce runoff at source, in addition to bioretention rain gardens with lined filter drains which provide interception, conveyance, and water quality treatment through filtration of sediments and associated pollutants. These features also contribute to reduced flow velocities and additional storage within the system.

Further attenuation is provided by a geocellular underground storage tank, which offers significant storage capacity and regulates discharge rates while maintaining the usability of the overlying amenity space. The SuDS measures operate as a treatment train, providing multiple stages of attenuation and water quality improvement prior to discharge. No infiltration to ground is proposed, with systems designed as lined features to protect groundwater. Collectively, the SuDS strategy will reduce peak runoff rates, improve surface water quality, and ensure that the development will not result in increased flood risk or adverse effects on the receiving environment.

Foul Sewerage

Separate wastewater sewer and storm sewer will be provided within the development, and systems will be connected together prior to the connection point to the existing combined sewer network. The foul and surface water systems will be designed to comply with BS EN 752-4, BS 8301 (guidance only), Irish Water Code of Practice, and the Technical Guidance Document H Drainage and Wastewater Disposal ARNA FHOILSIÚ AG OIFIG AN TSOLÁTHAIR. A Pre-Connection Enquiry has been submitted to Uisce Éireann.

Foul water will be directed to the combined public sewer, for treatment at the treatment plant in Bunlicky. Treated effluent is discharged into the River Shannon. This WWTP is fully licensed by the EPA D0013-01. The Annual Environmental Report (2024 available) indicates that this WWTP was compliant with all parameters. Capacity remains at this WWTP, with the peak hydraulic capacity as constructed to be 88,500m³.

3.2 SITE LOCATION AND SURROUNDING ENVIRONMENT

The application site is 0.13ha and it is located in the urban area of south Limerick city, within the townland of Prior's Land. The site is bounded by Hunt's Lane to the south-west, by Lady's Lane to the north-east, by buildings that front onto Dominick St to the north-west, and by buildings that front onto Parnell St in the south-east.

The land-use surrounding the site is largely urban / sub-urban, where commercial and residential areas dominate. The habitats associated with these areas include buildings and artificial surfaces and amenity grasslands and gardens. Further beyond the site and in the rural and semi-rural areas surrounding the city, agriculture is the main land-use and improved/semi-improved agricultural grassland is the dominant habitat associated with this use. The site is also close to the River Shannon and its associated estuarine habitats.

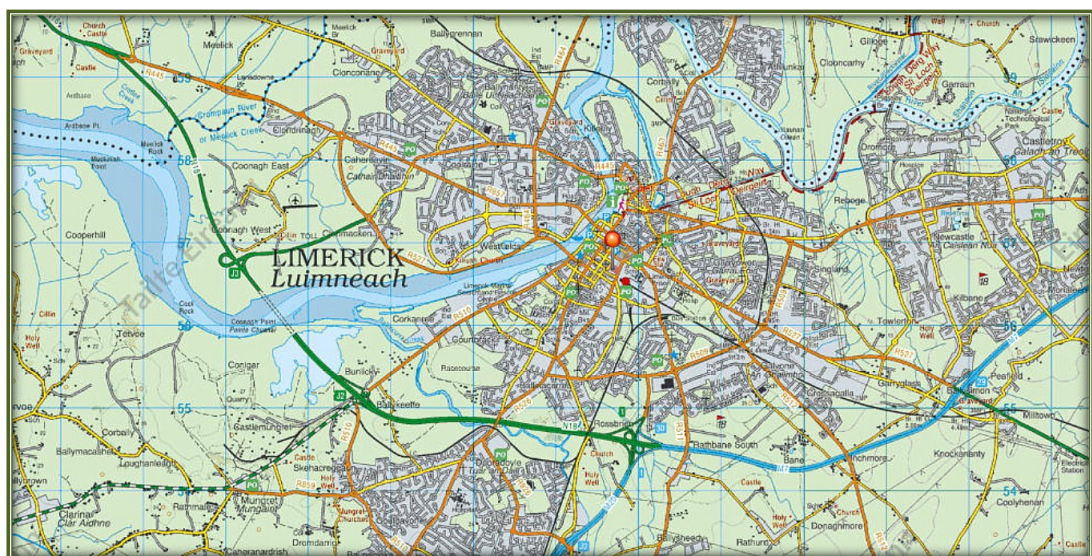


Figure 2 – Site Location Map (Site Pinned)

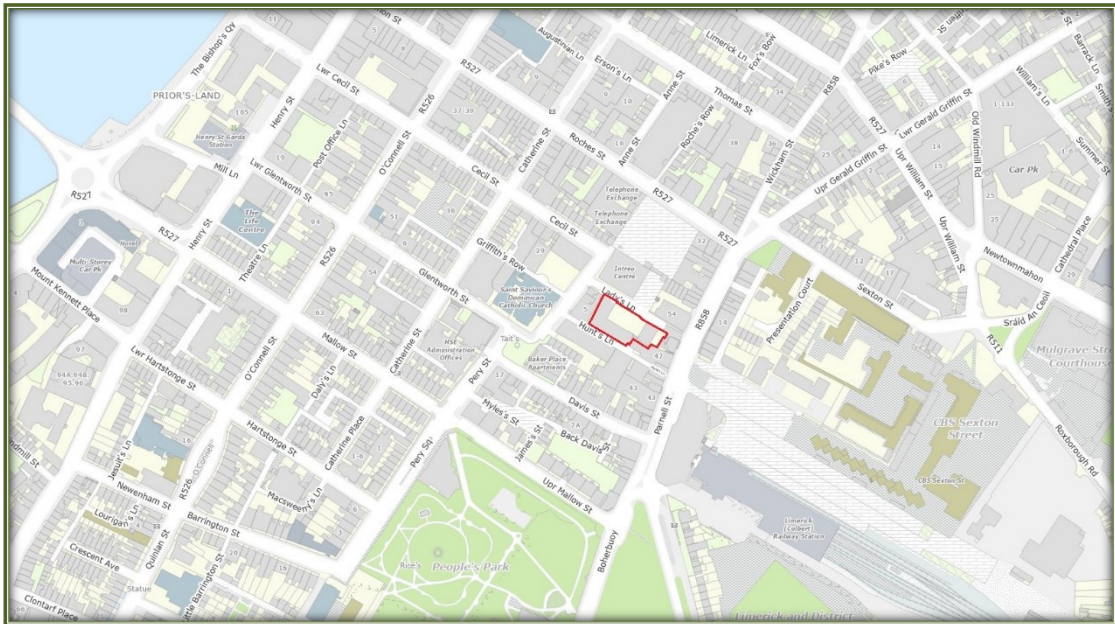


Figure 3 – Site Location Map. Application Site Outlined in Red

HABITATS WITHIN THE SITE

No part of the site lies within or adjacent to any site that has been designated for nature conservation purposes. The site is entirely brownfield and it encompasses a large building and existing small carpark. The only habitat within the site is Buildings and Artificial Surfaces (Fossit Code BL3). There are no natural habitats or vegetation features within the site. The site is of no biodiversity value.

WATER FEATURES AND QUALITY

The application site is located within the Shannon Estuary South Hydrometric Area (24) and Catchment (24), and the Ballynaclogh Sub-Catchment (010) and Sub-Basin (010). There are no drains, streams or other water features within or adjacent to the application site. The closest watercourse to the site is the main channel River Shannon which is ~470m north-west of the application site.

The EPA have classified the ecological status of the River Shannon (EPA refer to it at this point as the Limerick Dock) at points close to the application site as a transitional water body (Estuary) and it is noted to be of poor ecological status. Under the requirements of the Water Framework Directive in Ireland, this is unsatisfactory and good status should be achieved in the River Shannon Estuary and all other watercourses within the current cycle of the WFD, i.e., by 2027.

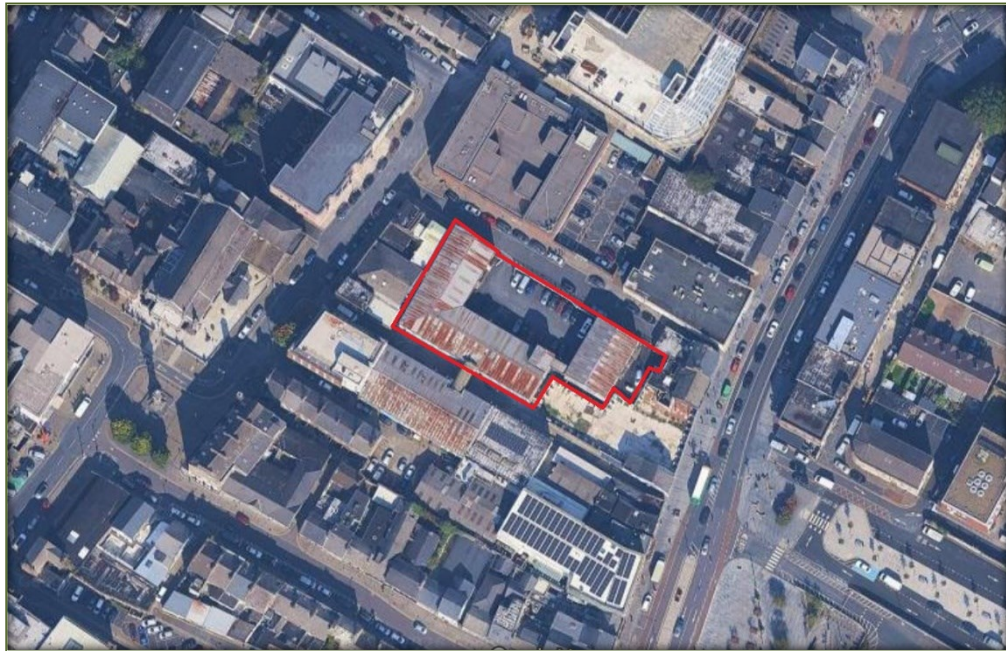


Figure 4a – Aerial Photograph of the Site (Outlined in Red) and its Surrounding Habitats © Google



Figure 4b – Street View of the Site from Lady's Lane © Google



Figure 4c – Street View of the Site from Hunt's Lane © Google

3.3 NATURA 2000 SITES IDENTIFIED

In accordance with the guidelines issued by the Department of the Environment and Local Government, a list of Natura 2000 sites within 15km of the proposed development have been identified and described according to their site synopsis, qualifying interests and conservation objectives. In addition, any other sites further than this, but potentially within its zone of interest were also considered. The zone of impact may be determined by an assessment of the connectivity between the application site and the designated areas by virtue of hydrological connectivity, atmospheric emissions, flight paths, ecological corridors etc.

For significant effects to arise, there must be a potential impact facilitated by having a *source*, i.e., the proposed development and activities arising out of its construction or operation, a *receptor*, i.e., the European site and its qualifying interests and a subsequent *pathway* or *connectivity* between the source and receptor, e.g., a water course. The likelihood for significant effects on the European site will largely depend on the characteristics of the source (e.g., nature and scale of the construction works), the characteristics of the existing pathway and the characteristics of the receptor, e.g., the sensitivities of the Qualifying Interests (habitats or species) to changes in water quality.

There are six Natura 2000 sites within 15km of this proposed development. These sites are summarised in Table 1. The location of the application site in relation to these designated areas is shown in Figures 5 and 6, and a full synopsis of these sites can be read online on the website of the National Parks and Wildlife Service (www.npws.ie).

European Site	Distance	Qualifying Interests	Screened In / Out
Lower River Shannon SAC 002165	440m north-west	- Sandbanks which are slightly covered by sea water all the time - Estuaries - Mudflats and sandflats not covered by seawater at low tide - Coastal lagoons - Large shallow inlets and bays - Reefs - Perennial vegetation of stony banks - Vegetated sea cliffs of the Atlantic and Baltic coasts - Salicornia and other annuals colonising mud and sand - Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>) - Mediterranean salt meadows (<i>Juncetalia maritimi</i>)	<i>Screened Out - There are no watercourses on the site and there is no hydrological connectivity between the application site and this SAC, therefore significant effects arising on this site due to pollutant containing run-off during construction and operation are unlikely to arise.</i> <i>However, due to the proximity of the site to this SAC, the QIs of the site will be considered in further detail.</i>

		• Water courses of plain to montane levels with the <i>Ranunculus fluitantis</i> and Callitriche-Batrachion vegetation • Molinia meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinia caerulea</i>) • Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (Alno-Padion, Alnus incanae, Salix alba) • <i>Margaritifera margaritifera</i> (Freshwater Pearl Mussel) • <i>Petromyzon marinus</i> (Sea Lamprey) • <i>Lampetra planeri</i> (Brook Lamprey) • <i>Lampetra fluviatilis</i> (River Lamprey) • <i>Salmo salar</i> (Salmon) • <i>Tursiops truncatus</i> (Common Bottlenose Dolphin) • <i>Lutra lutra</i> (Otter)	
River Shannon and River Fergus Estuaries SPA 004077	510m north-west	• Cormorant (<i>Phalacrocorax carbo</i>) • Whooper Swan (<i>Cygnus cygnus</i>) • Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) • Shelduck (<i>Tadorna tadorna</i>) • Wigeon (<i>Anas penelope</i>) • Teal (<i>Anas crecca</i>) • Pintail (<i>Anas acuta</i>) • Shoveler (<i>Anas clypeata</i>) • Scaup (<i>Aythya marila</i>) • Ringed Plover (<i>Charadrius hiaticula</i>) • Golden Plover (<i>Pluvialis apricaria</i>) • Grey Plover (<i>Pluvialis squatarola</i>) • Lapwing (<i>Vanellus vanellus</i>) • Knot (<i>Calidris canutus</i>) • Dunlin (<i>Calidris alpina</i>) • Black-tailed Godwit (<i>Limosa limosa</i>) • Bar-tailed Godwit (<i>Limosa lapponica</i>) • Curlew (<i>Numenius arquata</i>) • Redshank (<i>Tringa totanus</i>) • Greenshank (<i>Tringa nebularia</i>) • Black-headed Gull (<i>Chroicocephalus ridibundus</i>) • Wetland and Waterbirds	Screened Out - There are no watercourses on the site and there is no hydrological connectivity between the application site and this SPA, therefore significant effects arising on this site due to pollutant containing run-off during construction and operation are unlikely to arise. However, due to the proximity of the site to this SPA, the QIs of the site will be considered in further detail.

Glenomra Wood SAC 001013	10.7km north	• Old sessile oak woods with Ilex and Blechnum in the British Isles	<i>Screened Out - There is no hydrological connectivity between the application site and this SAC, therefore significant effects arising on this site due to pollutant containing run-off during construction and operation can be ruled out.</i> <i>This SAC is at a sufficient distance from the site to ensure that significant effects on the QIs of this SAC will not arise.</i>
Tory Hill SAC 000439	13.1km south	• Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) • Calcareous fens with <i>Cladium mariscus</i> and species of the Caricion davallianae • Alkaline fens	<i>Screened Out - There is no hydrological connectivity between the application site and this SAC, therefore significant effects arising on this site due to pollutant containing run-off during construction and operation can be ruled out.</i> <i>This SAC is at a sufficient distance from the site to ensure that significant effects on the QIs of this SAC will not arise.</i>
Askeaton Fen Complex SAC 002279	15km south-west	• Calcareous fens with <i>Cladium mariscus</i> and species of the Caricion davallianae • Alkaline fens	<i>Screened Out - There is no hydrological connectivity between the application site and this SAC, therefore significant effects arising on this site due to pollutant containing run-off during construction and operation can be ruled out.</i> <i>This SAC is at a sufficient distance from the site to ensure that significant effects on the QIs of this SAC will not arise.</i>
Ratty River Cave SAC 002316	15km north-west	• Lesser Horseshoe Bat (<i>Rhinolophus hipposideros</i>) • Caves not open to the public	<i>Screened Out - There is no hydrological connectivity between the application site and this SAC, therefore significant effects arising on this site due to pollutant containing run-off during construction and operation can be ruled out.</i> <i>This SAC is at a sufficient distance from the site to ensure that significant effects on the QIs of this SAC will not arise.</i>

Table 1 – Natura 2000 Sites Within 15km of the Proposed Site

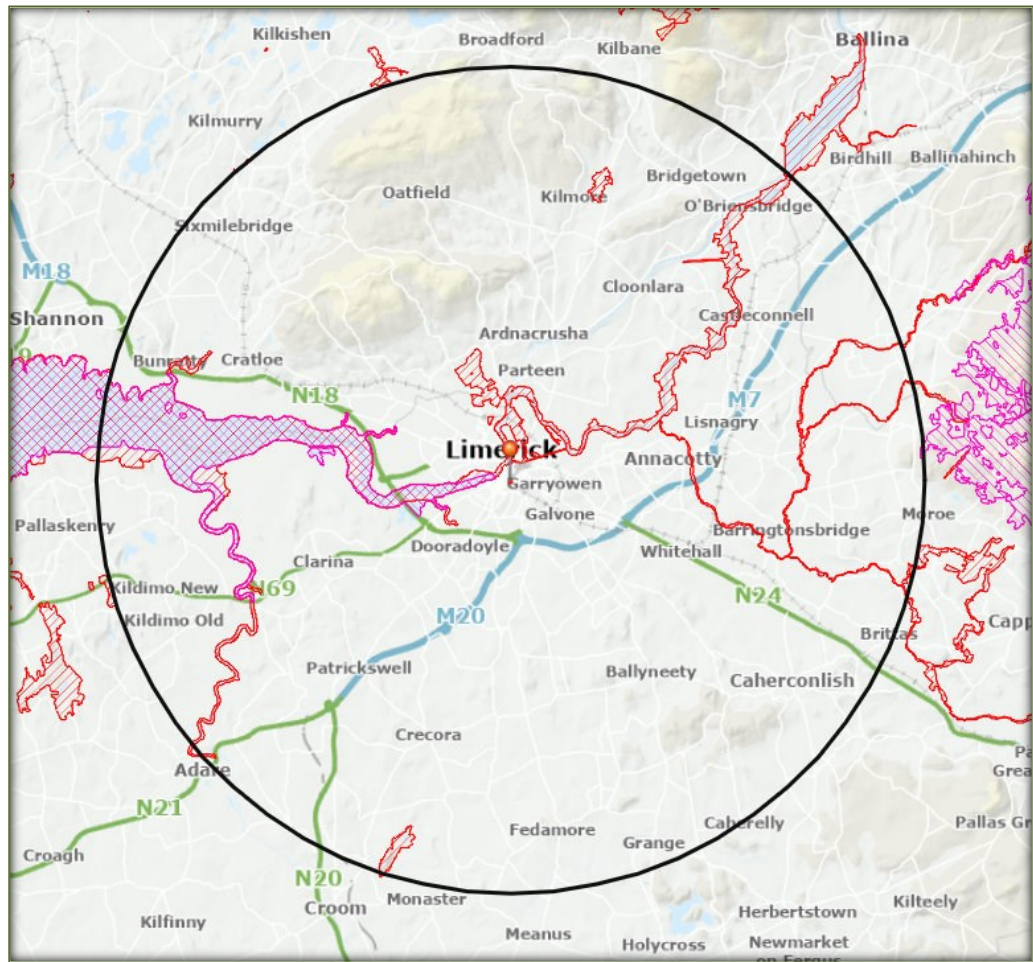


Figure 5 – The Application Site (Pinned) in relation to the Natura 2000 Sites Within 15km (SACs – Red Hatching, SPAs – Pink Hatching)



Figure 6 – The Application Site (Outlined) in relation to the Lower River Shannon SAC (Red Hatching) and the River Shannon and River Fergus Estuaries SPA (Pink Hatching)

LOWER RIVER SHANNON (SAC SITE CODE 0002165)

Site Synopsis

This site is a very large, long SAC, approximately 14 km wide and 120 km long, encompassing: the drained river valley which forms the River Shannon estuary; the broader River Fergus estuary, plus a number of smaller estuaries e.g. Poulmasherry Bay; the freshwater lower reaches of the Shannon River, between Killaloe and Limerick, plus the freshwater stretches of much of the Feale and Mulkear catchments; a marine area at the mouth of the Shannon estuary with high rocky cliffs to the north and south; ericaceous heath on Kerry Head and Loop Head; and several lagoons. The underlying geology ranges from Carboniferous limestone (east of Foynes) to Namurian shales and flagstones (west of Foynes) to Old Red Sandstone (at Kerry Head). The salinity of the system varies daily with the ebb and flood of the tide and with annual rainfall fluctuations seasonally.

The site contains many Annexed habitats, including the most extensive area of estuarine habitat in Ireland. A good range of Annexed species are also present, including the only known resident population of the common bottlenose dolphin *Tursiops truncatus* in Ireland, all three Irish species of lamprey, and a good population of *Salmo salar*. A number of birds listed on the EU Birds Directive either winter or breed in the site. The site is internationally important for with more than 50,000 individuals occurring in winter. Several species listed in the Irish Red Data Book are present, perhaps most notably the only known Irish populations of *Scirpus triqueter*.

Site Specific Conservation Objectives

In 2012, the NPWS published Site Specific Conservation Objectives (SSCOs) for this SAC¹. These conservation objectives were also supported by a number of other documents relating to the marine, coastal, lagoon and woodland habitats and the watercourses of this large and complex SAC. In general, these SSCO aim to define the favourable conservation condition for the particular habitats or species at that site. They outline certain attributes (e.g., distribution, population structure, water quality) for different species and habitats with targets, which define favourable condition for a habitat or species at a particular site. The restoration or maintenance of habitats and species within the Natura 2000 sites at favourable conservation condition will contribute to the overall maintenance of favourable conservation status of those habitats and species at national level. For the Lower River Shannon SAC, these SSCO can be downloaded on the NPWS website. Arising from the proposed development

¹ NPWS (2012) Conservation Objectives: Lower River Shannon SAC 002165. Version 1.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

at Hunt's Lane / Lady's Lane , any potential threats to the attributes and targets as defined in these SSCO's were assessed.

For each Qualifying Interest of the SAC, the specific conservation objective is either to *maintain or restore* the favourable conservation condition of that interest, by defining a list of attributes and targets which are indicative of the conservation status of that interest. For habitats, the main attributes include habitat area; habitat and community distribution; vegetation structure/composition and physical structure. The main target is to ensure that the habitats are stable or increasing in area and that the other attributes are maintained or restored. For the Annex II species of the SAC, the main attributes are population trend and distribution, whilst the targets aim to ensure that the long term population trends of the species are stable or increasing and that there is no significant decrease in the numbers or range of areas used by the species, other than that occurring from natural patterns of variation.

Qualifying Interests of the Lower River Shannon SAC

The Lower River Shannon SAC covers an extensive area of the south-west of Ireland. It is over 68,000 hectares in area and it has 21 qualifying interests. All QIs of the SAC are listed below Table 2. The potential significant effects upon each QI are considered.

Qualifying Interest [Code]	Objective	Attributes	Potential Significant Effects
Freshwater pearl mussel <i>Margaritifera margaritifera</i> [1029]	To <i>restore</i> its favourable conservation condition	• Distribution • Population Size • Population Structure • Habitat Extent • Water Quality • Substratum Quality • Hydrological Regime • Host Fish	No - Within this SAC, this species only occurs within the Cloon River in Co. Clare. It does not occur within the Zone of Influence of the application site. Significant effects upon this species can be ruled out.
Sea lamprey <i>Petromyzon marinus</i> [1095]	To <i>restore</i> its favourable conservation condition	• Distribution • Population Structure of Juveniles • Juvenile Density in Fine Sediment • Extent and Distribution of Spawning Habitat • Availability of Juvenile Habitat	No - There is no hydrological connectivity between the application site and the SAC, therefore significant effects upon this species arising from the construction or operation of this proposed development can be ruled out. There will be no decrease in water quality in the Lower River Shannon SAC arising from the proposed development. Significant effects upon this species can be ruled out.

Brook Lamprey <i>Lampetra planeri</i> [1096]	To <i>maintain</i> its favourable conservation condition	• Distribution • Population Structure of Juveniles • Juvenile Density in Fine Sediment • Extent and Distribution of Spawning Habitat • Availability of Juvenile Habitat	No - There is no hydrological connectivity between the application site and the SAC, therefore significant effects upon this species arising from the construction or operation of this proposed development can be ruled out. There will be no decrease in water quality in the Lower River Shannon SAC arising from the proposed development. Significant effects upon this species can be ruled out.
River Lamprey <i>Lampetra fluviatilis</i> [1099]	To <i>maintain</i> its favourable conservation condition	• Distribution • Population Structure of Juveniles • Juvenile Density in Fine Sediment • Extent and Distribution of Spawning Habitat • Availability of Juvenile Habitat	No - There is no hydrological connectivity between the application site and the SAC, therefore significant effects upon this species arising from the construction or operation of this proposed development can be ruled out. There will be no decrease in water quality in the Lower River Shannon SAC arising from the proposed development. Significant effects upon this species can be ruled out.
Salmon <i>Salmo salar</i> [1106]	To <i>restore</i> its favourable conservation condition	• Distribution • Adult Spawning Fish • Salmon Fry Abundance • Out-migrating Smolt Abundance • Number and Distribution of Redds • Water Quality	No - There is no hydrological connectivity between the application site and the SAC, therefore significant effects upon this species arising from the construction or operation of this proposed development can be ruled out. There will be no decrease in water quality in the Lower River Shannon SAC arising from the proposed development. Significant effects upon this species can be ruled out.
Sandbanks which are slightly covered by sea water all the time [1110]	To <i>maintain</i> its favourable conservation condition	• Habitat Distribution • Habitat Area • Community Distribution	No - Map 3 of the SSCOs illustrates the location of this QI in the SAC. It occurs at the mouth of the River Shannon, which is approximately 80km downstream of Limerick City. Its favourable conservation condition is not defined by any attributes relating to water quality. Significant effects upon this habitat can therefore be ruled out.
Estuaries [1130]	To <i>maintain</i> its favourable conservation condition	• Habitat Area • Community Distribution	No - The River Shannon downstream of Limerick City is considered an estuarine habitat and this is shown in Map 4 of the SSCO. As there is no hydrological connectivity between the application site and

			this habitat, significant effects upon this habitat arising from pollution from constructional or operational run-off can be ruled out.
Mudflats and sandflats not covered by seawater at low tide [1140]	To <i>maintain</i> its favourable conservation condition	• Habitat Area • Community Distribution	No - Map 5 of the SSCOS indicates that this habitat occurs in the Shannon Estuary around Limerick City. However, the favourable conservation condition is not defined by any attributes relating to water quality. In addition, as there is no hydrological connectivity between the application site and this habitat, significant effects upon this habitat arising from pollution from constructional or operational run-off can be ruled out.
Coastal lagoons [1150]	To <i>restore</i> its favourable conservation condition	• Habitat Area • Habitat Distribution • Salinity Regime • Hydrological Regime • Barrier connectivity between Lagoon and Sea • Water Quality • Depth of Macrophyte Colonisation • Typical Plant Species • Typical Animal Species • Negative Indicator Species •	No - Map 6 of the SSCOs illustrates the location of this QI in the SAC. There are a number of coastal lagoons within this SAC. The closest one to the application site is near Shannon airport and this is over 20km north-west of the application site. Given this distance, significant effects upon this habitat can be ruled out.
Large shallow inlets and bays [1160]	To <i>maintain</i> its favourable conservation condition	• Habitat Area • Community Distribution	No - Map 7 of the SSCOs illustrates the location of this QI in the SAC. It occurs in the Shannon Estuary, downstream of Kilrush which is over 60km west of the application site. Given this distance, significant effects upon this habitat can be ruled out.
Reefs [1170]	To <i>maintain</i> its favourable conservation condition	• Habitat Distribution • Habitat Area • Community Distribution	No - Map 8 of the SSCOs illustrates the location of this QI in the SAC. It occurs downstream of Limerick city. Its favourable conservation condition is not defined by any attributes relating to water quality. In addition, as there is no hydrological connectivity between the application site and this habitat, significant effects upon this habitat arising from pollution from constructional or

			operational run-off can be ruled out.
Perennial vegetation of stony banks [1220]	To <i>maintain</i> its favourable conservation condition	• Habitat Area • Habitat Distribution • Physical Structure • Vegetation Structure • Vegetation Composition	No - Map 10 of the SSCOs illustrates the location of this QI in the SAC. Its closest location is at Ballymacrinan Bay, which is circa 56km west of the application site. Given this distance, significant effects upon this habitat can be ruled out.
Vegetated sea cliffs of the Atlantic and Baltic coasts [1230]	To <i>maintain</i> its favourable conservation condition	• Habitat Length • Habitat Distribution • Physical Structure • Vegetation Structure • Vegetation Composition	No - Map 11 of the SSCOs illustrates the location of this QI in the SAC. Its closest location is at Burrane, which is circa 51km west of the application site. Having regards to this distance, significant effects upon this habitat can be ruled out.
Salicornia and other annuals colonising mud and sand [1310]	To <i>maintain</i> its favourable conservation condition	• Habitat Area • Habitat Distribution • Physical Structure • Vegetation Structure • Vegetation Composition	No - Map 12 of the SSCOs illustrates the location of this QI in the SAC. Its distribution is sparse and the closest mapped location to the application site is over 54km west of the application site. Given this distance, significant effects upon this habitat can be ruled out.
Atlantic salt meadows [1330]	To <i>restore</i> its favourable conservation condition	• Habitat Area • Habitat Distribution • Physical Structure • Vegetation Structure • Vegetation Composition	No - This is the most common saltmarsh habitat within the SAC. Map 12 of the SSCOs illustrates the location of this QI in the SAC. Its closest potential point to the application site is approximately 11km west of the application site. Given this distance and the fact that water quality is not a target in restoring this QI, along with the fact that there is no hydrological connectivity between the application site and this SAC, significant effects upon this habitat can be ruled out.
Bottlenose dolphin <i>Tursiops truncatus</i> [1349]	To <i>maintain</i> its favourable conservation condition	• Access to Suitable Habitat • Habitat Use: Critical Areas • Disturbance	No - There is no hydrological connectivity between the application site and the SAC, therefore significant effects upon this species arising from the construction or operation of this proposed development can be ruled out. There will be no decrease in water quality in the SAC arising from the proposed development. There will be no disturbance to any habitats used by this species within the SAC.

			Significant effects upon this species can be ruled out.
Otter <i>lutra lutra</i> [1355]	To <i>restore</i> its favourable conservation condition	• Distribution • Extent of Terrestrial, Marine, Freshwater Habitats • Couching Sites and Holts • Fish Biomass Available • Barriers to Connectivity	No - There is no hydrological connectivity between the application site and the SAC, therefore significant effects upon this species arising from the construction or operation of this proposed development can be ruled out. There will be no decrease in water quality in the SAC arising from the proposed development. There are no suitable riparian habitats within the application site for this species. Significant effects upon this species can be ruled out.
Mediterranean salt meadows [1410]	To <i>restore</i> its favourable conservation condition	• Habitat Area • Habitat Distribution • Physical Structure • Vegetation Structure • Vegetation Composition	No - Map 12 of the SSCOs illustrates the location of this QI in the SAC. It occurs in small pockets throughout the SAC. Its closest potential point to the application site is at Barrigone, approximately 30km west of the application site. Given this distance and the fact that there is no hydrological connectivity, significant effects upon this habitat can be ruled out.
Water courses of plain to montane levels with the <i>Ranunculus fluitantis</i> and Callitricho-Batrachion vegetation [3260]	To <i>maintain</i> its favourable conservation condition	• Habitat Area • Habitat Distribution • Hydrological Regime • Substratum Composition • Water Quality • Vegetation Composition • Floodplain Connectivity • Riparian Habitat	No - Map 13 of the SSCOs illustrates the location of this QI in the SAC. It occurs in the freshwater upper areas of the Shannon and also in the transitional waters. It has been mapped at points around Limerick city (<i>Schoenoplectus triquetra</i> subtype). As there is no hydrological connectivity between the application site and the SAC, significant effects upon this habitat can be ruled out.
Molinia meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinia caerulea</i>) [6410]	To <i>maintain</i> its favourable conservation condition	• Habitat Area • Habitat Distribution • Physical Structure • Vegetation Structure • Vegetation Composition	No - Full distribution of this habitat within the SAC is unknown, but it has been recorded on the eastern banks of the Shannon, just north of Castleconnell, Co. Limerick. It is a terrestrial habitat, and water quality is not a target in maintaining its favourable conservation condition in the SAC. It is unlikely to occur within the Zone of Influence of the application site and therefore significant effects upon this habitat can be ruled out.

Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> [91E0]	To <i>restore</i> its favourable conservation condition	• Habitat Area • Habitat Distribution • Woodland Size • Woodland Structure • Hydrological Regime • Vegetation • Compostion	No - Map 14 of the SSCO illustrates the location of this habitat within the SAC. It is found upstream of Limerick city and therefore it is outside of the Zone of Influence of the proposed development. In addition, water quality is not a target in maintaining its favourable conservation condition in the SAC. Therefore, significant effects upon this habitat can be ruled out.
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Table 2 – The Qualifying Interests of the Lower River Shannon SAC

RIVER SHANNON AND RIVER FERGUS ESTUARIES SPA 004077Site Synopsis

The River Shannon and River Fergus Estuaries form the largest estuarine complex in Ireland. The site comprises all of the estuarine habitat west from Limerick City and south from Ennis, extending west as far as Killadysert and Foynes on the north and south shores of the Shannon respectively (a distance of some 25 km from east to west). Also included are several areas in the outer Shannon estuary, notably Clonderalaw Bay and Poulmasherry Bay. The site has vast expanses of intertidal flats. The main macro-invertebrate community is a *Macoma-Scrobicularia-Nereis* community which provides a rich food resource for the wintering birds. Eelgrass (*Zostera* spp.) is present in places. The intertidal flats are often fringed with salt marsh vegetation, areas which provide important high tide roost sites for the birds. In the innermost parts of the estuaries, the tidal channels or creeks are fringed with species such as *Phragmites australis* and *Scirpus* spp. *Spartina anglica* is frequent in parts.

This is the most important coastal wetland site in the country and regularly supports in excess of 50,000 wintering waterfowl. It has internationally important populations of *Calidris alpina*, *Limosa limosa* and *Tringa totanus*. A further 16 species have populations of national importance. The site is particularly significant for *Calidris alpina* (11% of national total), *Pluvialis squatarola* (7.5% of total), *Vanellus vanellus* (6.5% of total), *Tringa totanus* (6.1% of total) and *Tadorna tadorna* (6.0% of total). It has *Cygnus cygnus*, *Pluvialis apricaria* and *Limosa lapponica* in significant numbers. The site was formerly frequented by a population of *Anser albifrons flavirostris* but these have now abandoned the area. The site provides both feeding and roosting areas for the wintering birds and habitat quality for most of the estuarine habitats is good.

Site Specific Conservation Objectives

In 2012, the NPWS published full SSCOs for this site². These SSCOs, along with the full NPWS site synopsis for this SPA can be read on the website of the National Parks and Wildlife Service. The conservation objective supporting documents and the Natura 2000 standard data form are also obtainable here. All these documents were referred to in the preparation of this AA Screening Report.

Qualifying Interests of the River Shannon and River Fergus Estuaries SPA

There are 21 bird species listed as Special Conservation Interests (SCIs) for this SPA, whilst wetlands and waterbirds is also an additional interest.

The SCI species for the River Shannon and Fergus Estuary SPA are listed below in Table 3 along with their current conservation condition. The primary objective of this SPA is to maintain the favourable conservation condition of these non-breeding waterbird SCI species listed for this SPA.

This objective is defined by the following attributes and targets:

- To be favourable, the long-term population trend for each waterbird Special Conservation Interest species should be stable or increasing. Waterbird populations are deemed to be unfavourable when they have declined by 25% or more, as assessed by the most recent population trend analysis.
- To be favourable, there should be no significant decrease in the range, timing or intensity of use of areas by the waterbird species of Special Conservation Interest, other than that occurring from natural patterns of variation.

Factors that can adversely affect the achievement of Objective 1 include:

- Habitat modification: activities that modify discreet areas or the overall habitat(s) within the SPA in terms of how one or more of the listed species use the site (e.g. as a feeding resource) could result in the displacement of these species from areas within the SPA and/or a reduction in their numbers.

² NPWS (2012) *Conservation Objectives: River Shannon and River Fergus Estuaries SPA 004077. Version 1.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.*

- Disturbance: Anthropogenic disturbance that occurs in or near the site and is either singular or cumulative in nature could result in the displacement of one or more of the listed waterbird species from areas within the SPA, and a reduction in their numbers.
- Ex-situ factors: several of the listed waterbird species may at times use habitats situated within the immediate hinterland of the SPA or in areas ecologically connected to it. The reliance on these habitats will vary from species to species and from site to site. Significant habitat changes or increased levels of disturbance within these areas could result in the displacement of one or more of the listed waterbird species from areas within the SPA, and/or a reduction in their numbers

Species	Site Conservation Condition	BoCCI Category ³
Cormorant (<i>Phalacrocorax carbo</i>)	Undetermined	Amber
Whooper Swan (<i>Cygnus cygnus</i>)	Favourable	Amber
Light-bellied Brent Goose (<i>Branta bernicla hrota</i>)	Undetermined	Amber
Shelduck (<i>Tadorna tadorna</i>)	Undetermined	Amber
Wigeon (<i>Anas penelope</i>)	Highly Unfavourable	Amber
Teal (<i>Anas crecca</i>)	Undetermined	Amber
Pintail (<i>Anas acuta</i>)	Undetermined	Red
Shoveler (<i>Anas clypeata</i>)	Undetermined	Red
Scaup (<i>Aythya marila</i>)	Undetermined	Amber
Ringed Plover (<i>Charadrius hiaticula</i>)	Undetermined	Amber
Golden Plover (<i>Pluvialis apricaria</i>)	Undetermined	Red
Grey Plover (<i>Pluvialis squatarola</i>)	Undetermined	Amber
Lapwing (<i>Vanellus vanellus</i>)	Undetermined	Red
Knot (<i>Calidris canutus</i>)	Undetermined	Red
Dunlin (<i>Calidris alpina</i>)	Undetermined	Amber
Black-tailed Godwit (<i>Limosa limosa</i>)	Undetermined	Amber
Bar-tailed Godwit (<i>Limosa lapponica</i>)	Undetermined	Amber
Curlew (<i>Numenius arquata</i>)	Undetermined	Red
Redshank (<i>Tringa totanus</i>)	Undetermined	Red
Greenshank (<i>Tringa nebularia</i>)	Undetermined	Amber
Black-headed Gull (<i>Chroicocephalus ridibundus</i>)	Undetermined	Red
Wetland and Waterbirds	N/A	N/A

Table 3 – Species of the River Shannon and River Fergus Estuaries SPA

³ BoCCI – Birds of Conservation Concern Ireland. See Lynas et al. (2007) for detailed listing criteria;

The Conservation Objectives for waterbird SCIs of the River Shannon and River Fergus Estuary SPA are listed below:

Parameter	Attribute	Measure	Target
Population	Population trend	Percentage change as per population trend assessment using water bird count data collected through the Irish Wetland Bird Survey and other surveys.	Long term population trend stable or increasing
Range	Distribution	Number and range of areas used by water birds as determined by regular low tide and other water bird surveys	No significant decrease in the range, timing or intensity of use of areas by the QI, other than that occurring from natural patterns of variation

Table 4 – Conservation Objectives of the Conservation Interests of the SPA (Species)

For wetlands, the conservation objective is to maintain the favourable conservation condition of the wetland habitats at the River Shannon and River Fergus Estuaries SPA as a resource for the regularly occurring migratory waterbirds that utilise it. This is defined by the following attributes and targets.

Parameter	Attribute	Measure	Target
Area	Wetland habitat	Area (ha)	The permanent area occupied by the wetland habitat should be stable and not significantly less than the area of 32,261 hectares, other than that occurring from natural patterns of variation

Table 5 – Conservation Objectives of the Conservation Interests of the SPA (Wetlands)

Potential Significant Effects upon the QIs of this SPA

As there is no hydrological connectivity between the application site and this SPA, then it is considered that significant effects arising on these species can be ruled out. There will be no emissions into any surface waters during the construction or operation of the proposed development that could cause pollution in this SPA and significant effects upon these bird species will not arise.

There is a sufficient separation distance between the application site and the SPA boundary to ensure that significant effects upon the bird species do not arise due to visual or noise disturbances. The site is 510m from the SPA boundary. At this distance, construction noise from the site will be less than 70dB, and is unlikely to generate any response in waterbirds that might be using the River Shannon at that time⁴.

There will be no loss of disturbance to any of the wetland habitats within this SPA.

⁴ Cutts, N., Hemingway, K. & Spencer, J. (2013). *Waterbird Disturbance Mitigation Toolkit: Informing Estuarine Planning & Construction Projects*. Institute of Estuarine & Coastal Studies (IECS), University of Hull. Available at: [TIDE Toolbox website](#).

3.4 IMPACT ASSESSMENT

The potential impacts of the proposed development on the Natura 2000 sites identified are described below.

Describe the individual elements of the project (either alone or in combination with other plans or projects) likely to give rise to impacts on nearby Natura 2000 site:

The construction and operation of the proposed development at Dominick Street will not give rise to significant effects on any European sites. In particular, the proposed development will have no significant effects on the Lower River Shannon SAC or the River Shannon and River Fergus Estuaries SPA.

While the application site is located in proximity to these Natura 2000 sites, there are no direct or indirect source–pathway–receptor linkages between the application site and these designated areas. In the absence of any such pathways, there is no mechanism by which pollutants or other disturbances arising during the construction or operational phases of the proposed development could be transmitted to the designated sites. Accordingly, the proposed development will not result in significant effects on the qualifying interests or conservation objectives of the Lower River Shannon SAC or the River Shannon and River Fergus Estuaries SPA, either alone or in combination with other plans or projects.

Describe any likely direct, indirect or secondary impacts of the project (either alone or in combination with other plans or projects) on the nearby Natura 2000 sites by virtue of:

Size and scale: Having regards to the small size and scale of the development in relation to the overall size of the Lower River Shannon SAC and the River Shannon and River Fergus Estuaries SPA, the likelihood of any direct, indirect or cumulative impacts on these designated site arising from the construction and operation of the proposed development are low. All works will be undertaken within an existing brownfield site.

Land-take: There will be no land-take from any designated site. There will be no interference with the boundaries of any designated site.

Distance from Natura 2000 site or key features of the site: There are six Natura 2000 sites within 15km of the application site. The closest sites are the Lower River Shannon SAC and the River Shannon and River Fergus Estuaries SPA and these are 440m north-west and 510m north-west of the application site respectively. In this instance, given the fact that there is no hydrological connectivity between the application site and these sites, significant effects can be ruled out.

Resource requirements (water abstraction etc.): No resources will be taken from the Lower River Shannon SAC and the River Shannon and River Fergus Estuaries SPA and there are no resource requirements that will impact upon the Lower River Shannon SAC and the River Shannon and River Fergus Estuaries SPA.

Emissions: Neither the construction nor the operation of the proposed development will result in emissions to the Lower River Shannon SAC or the River Shannon and River Fergus Estuaries SPA. There will be no direct run-off from the application site to either of these designated European sites.

There are no watercourses within or immediately adjacent to the application site. As such, no pathway exists whereby surface water generated during the construction phase could enter a local watercourse and

subsequently be conveyed to the Lower River Shannon SAC or the River Shannon and River Fergus Estuaries SPA. Consequently, there is no potential for construction-related surface water run-off to reach these designated sites.

During the operational phase, surface water from the development will be managed in accordance with Sustainable Drainage Systems (SuDS) principles. Following appropriate attenuation and control, excess surface water will discharge to the existing combined sewer network. This discharge will occur within an established urban drainage system and will not give rise to any hydrological or water quality pathways to the Lower River Shannon SAC or the River Shannon and River Fergus Estuaries SPA. Accordingly, the operational drainage arrangements will not result in any effects on these European sites.

Excavation requirements: Excavated material from the construction will be used on site. Any remaining will be disposed of in a responsible manner in a licensed facility away from any designated sites.

Transportation requirements: There will be no additional transportation requirements resulting from the proposed development and associated works that will have any impact upon the Natura 2000 sites identified.

In-Combination / Cumulative Impacts: In order to assess the potential for in-combination effects, the planning portal of Limerick City and County Council was reviewed to identify recently granted and pending developments within the Dominick Street / Parnell Street area that may be relevant to the cumulative assessment. A number of commercial and residential developments have been permitted or submitted in the surrounding area in recent years. Many of these applications relate to relatively minor works including small-scale construction, alterations or extensions and are not considered likely to contribute to cumulative effects on European sites.

A number of larger developments within the vicinity of the application site were also identified and are summarised below.

Planning Ref. 25/60546 (Granted August 2025): Permission was granted for the demolition of an existing two-storey building at No. 47 Parnell Street and the construction of a six-storey mixed-use development comprising two ground floor retail units and 37 residential apartments (26 one-bedroom and 11 two-bedroom units), together with bicycle parking, an ESB substation, refuse storage, rooftop solar panels (optional), public lighting, service connections and all associated site works at 47–50 Parnell Street, Limerick. This site is located adjacent to the application site. The development was screened for Appropriate Assessment by the Planning Authority and significant effects on European sites were ruled out.

Planning Ref. 26/60134: Permission granted in April 2026 for the construction of a six-storey mixed-use development comprising two ground floor retail units and 32 residential apartments (21 one-bedroom and 11 two-bedroom units) together with bicycle parking, an ESB substation, refuse storage, rooftop solar panels (optional), public lighting, service connections and associated site works at 48–50 Parnell Street, Limerick. The development was screened for Appropriate Assessment by the Planning Authority and significant effects on European sites were ruled out.

Planning Ref. 23/60345 (Granted by An Coimisiún Pleanála, 2024): Permission was granted for the demolition of an existing two-storey dwelling and the construction of an eight-storey building over basement level comprising 21 residential units, communal areas and ground floor commercial space at Nos. 1–4 James Street and 6 and 7 Upper Mallow Street, Limerick City. The development includes cycle storage, bin storage, drainage infrastructure including attenuation and a blue roof system and all associated ancillary works. The development was screened for Appropriate Assessment and significant effects on European sites were ruled out.

Planning Ref. 22/1172 (Granted by An Coimisiún Pleanála, 2024): Permission was granted for the change of use, refurbishment and partial redevelopment of the former Railway Hotel (a Protected Structure) and associated buildings to provide student accommodation comprising 111 bed spaces together with a ground floor café, laundry facilities, bicycle and bin storage and associated site works at McEnery's Shop and Railway Hotel, Parnell Street and Davis Street, Limerick. The development was screened for Appropriate Assessment by the Planning Authority and significant effects on European sites were ruled out.

Having regard to the nature and scale of the proposed development, the absence of direct impact pathways to European sites and the findings of Appropriate Assessment screening for other developments within the area, it is considered that the proposed development will not give rise to likely significant effects on any European site, either alone or in combination with other plans or projects. Any future development proposals with the potential to impact upon European sites will be subject to Appropriate Assessment screening, and where required Appropriate Assessment, in accordance with Article 6(3) of the Habitats Directive.

Duration of construction, operation, decommissioning etc: Once construction begins, it should be complete within two years.

Describe any likely changes to the nearby Natura 2000 sites arising as a result of:

Reduction of habitat area: The proposed development lies outside the boundaries of the Natura 2000 sites identified in Section 3.3. There will be no reduction of designated habitat area within the Lower River Shannon SAC or the River Shannon and River Fergus Estuaries SPA. There will be no significant effects upon the habitat qualifying interests of the Lower River Shannon SAC. There will be no interference with the boundaries of the Lower River Shannon SAC or the River Shannon and River Fergus Estuaries SPA.

Disturbance to key species: There will be no disturbance to the species listed as Qualifying Interests of the Lower River Shannon SAC or the River Shannon and River Fergus Estuaries SPA. The application site does not contain any ex-situ habitats for the species listed as QIs of either of these sites.

Habitat or species fragmentation: There will be no habitat or species fragmentation within the Lower River Shannon SAC or the River Shannon and River Fergus Estuaries SPA. No ecological corridors between the proposed site and the Natura 2000 sites identified will be damaged or destroyed.

Reduction in species density: There will be no reduction in species density within the Lower River Shannon SAC or the River Shannon and River Fergus Estuaries SPA.

Changes in key indicators of conservation value (water quality etc.): There will be no negative impacts upon surface or ground water quality within the Lower River Shannon SAC and the River Shannon or River Fergus Estuaries SPA. There will be no negative impacts upon the water quality in any designated site.

Describe any likely impacts on the nearby Natura 2000 sites as a whole in terms of:

Interference with the key relationships that define the structure or function of the site: It is not considered likely that there will be any impacts on the key relationships that define the structure or function of the Natura 2000 sites identified.

Provide indicators of significance as a result of the identification of effects set out above in terms of:

Loss - Estimated percentage of lost area of habitat: None

Fragmentation: None

Disruption & disturbance: None

Change to key elements of the site (e.g. water quality etc.): None

3.5 FINDING OF NO SIGNIFICANT EFFECTS

Finding of No Significant Effects Report Matrix	
Name of project	A Residential Development (Purpose Built Student Accommodation) at Dominick Street, Limerick City
Name and location of Natura 2000 site	There are six Natura 2000 sites within 15km of the application site. The closest sites are the Lower River Shannon SAC and the River Shannon and River Fergus Estuaries SPA and these are 440m north-west and 510m north-west of the application site respectively. In this instance, given the fact that there is no hydrological connectivity between the application site and these sites, significant effects can be ruled out.
Is the project directly connected with or necessary to the management of the site?	No
Are there other projects or plans that together with project being assessed could affect the site?	No
The Assessment of Significance of Effects	
Describe how the project is likely to affect the Natura 2000 site	Having regard to the location, nature and scale of the proposed development, it is considered that there is no potential for significant effects either from the proposed development on its own or in combination with other plans and projects.
Explain why these effects are not considered significant	Not applicable as there is no potential for negative impacts
Describe how the project is likely to affect species designated under Annex II of the Habitats Directive.	No impacts likely
Data Collected to Carry out the Assessment	
Who carried out the assessment	Noreen McLoughlin, MSC, MCIEEM. Consultant Ecologist
Sources of data	NPWS, EPA, National Biodiversity Data Centre, Limerick City Council
Level of assessment completed	Stage1 Appropriate Assessment Screening
Where can the full results of the assessment be accessed and viewed	Full results included

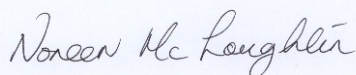
4 APPROPRIATE ASSESSMENT CONCLUSION

In accordance with Article 6(3) of the Habitats Directive, the relevant case law, established best practice and the precautionary principle, this AA Screening Report has examined the details of the project in relation to the relevant Natura 2000 sites within 15km of the application site.

At this stage of the AA process, it is for the competent authority, i.e., Limerick City Council, to carry out the screening for AA and to reach one of the following determinations:

- a) AA of the proposed development is required if it cannot be excluded, on the basis of objective information, that the proposed development, individually or in combination with other plans or projects, will not have a significant effect on any European sites;
- b) AA of the proposed development is *not* required if it can be excluded, on the basis of objective information, that the proposed development, individually or in combination with other plans or projects, will not have a significant effect on any European sites.

It is of the opinion of the author that an AA of the proposed development is not required as it can be excluded, on the basis of objective information provided in this report, that the proposed development, individually or in combination with other plans or projects, will not have a significant effect on any European sites.



Noreen McLoughlin, MSc, MCIEEM.
Ecologist.

(PI Insurance details available on request)