



BRÁITHREACHAS Phoblacht na hÉireann



Brendan Larkin
Associate Director Stantec
1 Galway Business Park, Dangan,
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17th October 2025

By Post & By Email; SineadKennedy@limerick.ie

Notice to Agent is Notice to Principal / Notice to Principal is Notice to Agent

Your Ref: LCG_0021

A Chara,

Your Public Report Date 20 May 2025 RE: Proposed Limerick City Greenway (UL to NTP) refers.

I note from Page 2 of your Report that the Proposed Greenway Route is marked to traverse Private Property at Willowbank Castletroy Limerick, said Private Property where William James McGuire is successor as heir and where the Irish Republican Brotherhood and Óglaigh na hÉireann hold Equitable Interest.

I attach for your ease of reference a copy of Plan Notice for this Private Property and advise that further information for the Private Property is available in the Public Domain <https://e-i-r-e.ie>

It is not the intention of William James McGuire and/or the Irish Republican Brotherhood and/or Óglaigh na hÉireann to stymie any proposals for the benefit of the People of the Castletroy Community, but we will however need to be directly furnished with full details of the proposal in order to consider consent for the proposal in so far as it affects the Private Property.

Please also note that it is our intention to reinstate Willowbank House on the Private Property and we would welcome the opportunity to share our advancements in this regard with you and other interested parties in the proposal as Willowbank House, once reinstated, will stand as a pinnacle for the Peace & Reconciliation Process for the People of Éire and beyond.

Yours Presently,

Chairman
IRB & Óglaigh
GPO Dublin C/O The Mermaid House
Liscannor, Clare, V95 DKF7, Éire



Our Reference LCG_0021

Your Reference

Date 20 May 2025

BY EMAIL ONLY

RE: Proposed Limerick City Greenway (UL to NTP),

- **Progress update on the proposed Greenway, Bat surveys, and proposed public lighting standard**

A Chara,

In June 2021, we sent a letter to the National Parks and Wildlife Service to inform that Limerick City and County Council (LCCC) had engaged Ryan Hanley to produce a preliminary design and carry out the planning application process for a proposed greenway in Castletroy, Co. Limerick. This letter provides an update on this project.

Introduction

The proposed Limerick City Greenway (University of Limerick (UL) to National Technology Park (NTP)) will be 4.25km long and will consist of a 3.3km long and 3.0-4.0m wide shared path on existing paths or in green fields, and 0.9km of separated 1.8m wide footpaths and 2.0m wide cycle lanes alongside the eastern and western sides of University Road and McLaughlan Road. The proposed Greenway will extend between the River Goody bridge and Plassey Park Road.

The route of the walkway is located along the banks of the Shannon within the grounds of the University of Limerick. The existing route is partially located within the Lower River Shannon SAC, interspersed with pockets of alluvial woodland along its banks.

Policy Background

The entire site is located within the administrative boundary of Limerick City and County Council. The proposed Limerick City Greenway (UL to NTP) is included in the Limerick Shannon Metropolitan Area Transport Strategy 2022 and the Limerick Development Plan 2022-2028 where the objective is to provide an effective, sustainable, and accessible transport system that will contribute to the creation of integrated cycling and pedestrian networks which will be accessible by all. It is an economic objective of LCCC to support the development of greenways in the county that will provide an amenity and a commuter function.

ACEI



DUBLIN

Directors: Catherine Schefer, Victoria Hall-Sturt, Gerard Gibney

Ryan Hanley Ltd Registered in Galway, Ireland Business No. 377118

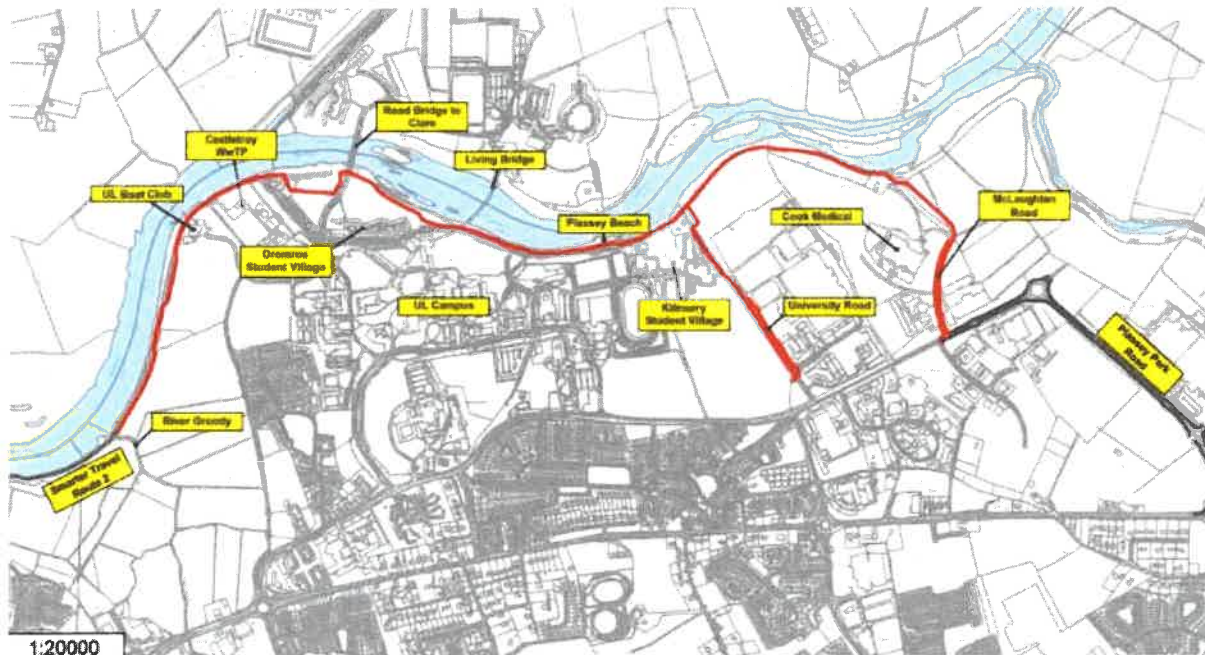
GALWAY

CORK



CASTLEBAR

The proposed Greenway is aligned with the “Code of Best Practice National and Regional Greenways” (December 2021), and the “Strategy for the Future Development of National and Regional Greenways” (July 2018).



Legend

- Proposed Greenway Route
- Existing Active Travel Link

Surveys

There have been extensive baseline survey work completed over the course of many years with all surveys updated to prepare for the application to An Bord Pleanála this summer. The surveys reflect the qualifying interests of the Lower Shannon SAC and the River Shannon and Fergus SPA located downstream of the site as well as those habitats and species protected under National legislation.

Bat Surveys

Bat surveys were initially undertaken on the 19th of July 2021 and between 9th – 21st September 2021 by Tom O'Donnell BSc (Hons) MSc. CEnv. MCIEEM., from O'Donnell Environmental, surveying every day at sunrise and sunset. No bat roosts were recorded although three buildings were classified as having 'Moderate' suitability for bat roosts. The mature tree species that were considered as Potential Roost Features were considered to have 'Low' suitability. The species include oak, beach, and sweet chestnut. The greenway has been designed to avoid these PRF trees located at the following locations CH850, CH1430 and CH1780 (chainage reference from Preliminary Design drawings).

A review of the NBDC revealed historical records for bat species within the area which include Daubenton's Bat (*Myotis daubentonii*), Lesser Horseshoe Bat (*Rhinolophus hipposideros*), Lesser Noctule (*Nyctalus leisleri*), Myotis Bat species (*Myotis*), Pipistrelle (*Pipistrellus pipistrellus sensu lato*), and Soprano Pipistrelle (*Pipistrellus pygmaeus*).

Eight bat species were recorded through echolocation including Lesser Horseshoe Bat (Annex II, EU Habitats Directive). During the active bat survey, Soprano Pipistrelles were the most frequently recorded species out of 350 individual registrations.

A Ground Level Tree Assessment (GLTA) was undertaken on the 10th of January 2024 to assess tree potential to support roosting bats. The visual roost survey was carried out to identify any bat roosting potential and it included a survey of structures during daytime to inspect Potential Roost Features (PRFs), as well as a survey of trees by ground-level roost assessment. The mature trees inspected were found to have no potential for maternity roost for any bat species. No unoccupied roosts which contained signs of bat occupation were encountered.

A further bat activity survey was carried out on the 19th of June and the 10th of July 2024. The surveys included nighttime walkover (transect) surveys and passive acoustic surveys to determine the areas and habitats within the ZOI of the proposed works which are being used by bats; the diversity and relative abundance of bats present and if bat roosting is occurring or likely to occur in the zone of influence of the proposed works. Passive detectors were placed in two locations for a total of 7 days (Detector 1: 19th-25th of June 2024 Inclusive. Detector 2: 03rd to the 09th of July 2024). Eight species of bat were detected during these passive surveys: Soprano Pipistrelle; Brown Long-eared Bat; Common Pipistrelle. Leisler's Bat; Daubenton's Bat; Natterer's Bat; Whiskered Bat and Nathusius' Pipistrelle. Soprano Pipistrelles were the most frequently recorded species during both the active transect and passive surveys followed by Common Pipistrelle, Daubenton's Bat and Leisler's Bat.

Proposed Public Lighting

There will be new public lighting along the shared path which follows the south bank of the River Shannon for approximately 3km. The Public Lighting design for the proposed project will use best practice guidance notes "*Bats and artificial lighting in the UK*" as published by the Bat Conservation Trust, in respect of mitigation strategies, to minimise the impact of outdoor lighting upon bat populations. The LCCC Public Lighting standard has also been followed. Public lighting will be controlled by light sensors and will turn off at 23:00 hours.

Light emitting diodes (LEDs) type lanterns of the cool white type in accordance with the LCCC Public Lighting standard will be installed. They will have a Colour Temperature of 3,000°Kelvin, because it is considered least disruptive to the emergence of bats from roosts at dusk, and subsequent movement from habitats to foraging locations. LED lanterns do not emit any ultraviolet or infra-red radiation, this again being a desirable feature in relation to impact upon bats, in terms of causing spatial exclusion from artificially lit areas. Light levels have been kept as low as possible (P4 Class) by reference to levels specified in "Design of road lighting" - BS EN 5489-1: 2020, and these will be in accordance with the LCCC Public Lighting standard.

Lanterns will be mounted at 0° degree tilt and will be the fully cut off type with no light output above the horizontal plane. Lanterns will be erected at 5m above ground level and lighting columns will be 30-35m apart. The height of the columns also mitigates against vandalism which can be an issue when placing luminaires in isolated locations.

The preliminary design and supporting environmental, archaeological, and ecological surveys and assessments are currently being finalised, and the Project Team will submit a planning application to An Bord Pleanála upon their completion. An EIAR, NIS, BMP and CEMP are being prepared to support the application.

We would welcome your preliminary comments, in particular in relation to the potential effects or disturbance to bats as a result of the proposed development and your views in relation to public lighting, if you require additional information, please contact Brendan Larkin larkinb@ryanhanley.ie and/or Sinead Kennedy sinead.kennedy@limerick.ie

Yours faithfully,



Brendan Larkin

Associate Director

Email: Sinead Kennedy, LCCC Project Manager [Sinead.Kennedy@limerick.ie]