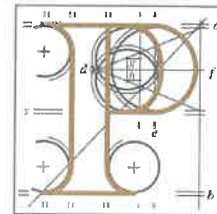


**Our Case Number:** ABP-306270-19



**An  
Bord  
Pleanála**

Limerick City & County Council  
c/o Séamus Hanrahan, Design and Delivery Services  
Merchant's Quay  
V94EH90  
Co. Limerick



**Date:** 18 February 2020

**Re: Flood protection measures around King's Island.  
King's Island, Limerick.**

A Chara,

Enclosed for your information are **two copies of nine submissions** received by the Board in relation to the above-mentioned proposed development from:


1. **Development Applications Unit**
2. **Development Applications Unit**
3. **Limerick City and County Council (Limerick Market Trustees),**
4. **Limerick City and County Council (Sarah McCutcheon, Archaeologist),**
5. **Curraghgour Boat Club**
6. **St. Mary's Area Integrated Development CLG**
7. **Maria Donoghue**
8. **Irish Water**
9. **Environmental Health Service.**

Please ensure that one copy of these submissions is kept available for inspection by the public.

If you have any queries in relation to the matter, please contact the undersigned officer of the Board.

Please quote the above-mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

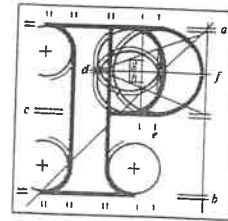
Yours faithfully,

  
Rob Mac Giollarnáth  
Executive Officer  
Direct Line: 01-8737247

EL05

<b>Teil</b>	<b>Tel</b>	(01) 858 8100
<b>Glaó Áitiúil</b>	<b>LoCall</b>	1890 275 175
<b>Facs</b>	<b>Fax</b>	(01) 872 2684
<b>Láithreán Gréasáin</b>	<b>Website</b>	www.pleanala.ie
<b>Ríomhphost</b>	<b>Email</b>	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902



Development Applications Unit  
c/o Diarmuid Buttimer, Department of Culture, Heritage and the Gaeltacht  
Newtown Road  
Wexford  
Co. Wexford  
Y35 AP90

Date: 17 February 2020

**Re: Flood protection measures around King's Island.  
King's Island, Limerick.**

A Chara,

An Bord Pleanála has received your submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

The Board will revert to you in due course in respect of this matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of Limerick City and County Council and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: [www.pleanala.ie](http://www.pleanala.ie).

If you have any queries in the meantime please contact the undersigned officer of the Board. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

*Rob Mac Giollarnáth*

Rob Mac Giollarnáth  
Executive Officer  
Direct Line: 01-8737247

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902



Your Ref: **ABP-306270-19**  
Our Ref: **177AE King's Island Flood Relief**  
(Please quote in all related correspondence)

14 February 2020

The Secretary  
An Bord Pleanála  
64 Marlborough Street  
Dublin 1  
D01 V902

Via email to [bord@pleanala.ie](mailto:bord@pleanala.ie)

Re: Notification to the Minister for Culture, Heritage and the Gaeltacht under the Planning and Development Act, 2000, as amended.

**177AE: Limerick City & County Council): King's Island Flood Relief Scheme**

A chara

On behalf of the Department of Culture, Heritage and the Gaeltacht, I refer to correspondence received in connection with the above.

Outlined below are heritage-related observations/recommendations of the Department under the stated heading(s).

**Nature Conservation**

Parts of the proposed development are immediately adjacent to, or on occasion just within, the Lower River Shannon candidate Special Area of Conservation (cSAC) (2165). This Department has no issues to raise concerning residual impacts on this site, subject to all relevant mitigation measures being clearly and effectively implemented.

**Protected plant species - Opposite-leaved pondweed**

The proposed development will also impact the habitat of a protected species of plant, the opposite-leaved pondweed (*Groenlandia densa*), which was discovered during the ecological assessment for this project, growing in a drainage ditch on the north-east of King's Island within the footprint of the proposed flood embankment. A Wildlife Act Section 21 licence has been obtained for the translocation of opposite-leaved pondweed from the existing drainage ditch to the newly created drainage ditch, with the condition that the detailed translocation plan will be finalised and agreed with the National Parks and Wildlife Service (NPWS) of this Department.



As the Board will need to complete the EIA, it is important to answer the question as to whether there is still uncertainty concerning the likely success of the translocation, which will require further assessment by the NPWS, and hence the requirement for agreement with the NPWS after planning permission is granted. In other words, is the EIAR incomplete because it is leaving full assessment of the translocation until after the decision to approve the project?

Translocation of opposite-leaved pondweed has had low success in the past, and therefore the initial preference of the NPWS was to retain the existing drainage ditch (see p. 61 of the EIAR). However, detailed sequencing and specification of the construction and careful handling of the translocated material should reduce the factors which have contributed to failure in the past. This will require an adaptive management approach, with particular emphasis on having a minimum storage period between infilling of the existing habitat and creating the new habitat. This will require detailed coordination with the contractor, hence the need for further agreement with the NPWS. However, complete translocation success cannot be guaranteed.

The EIAR concludes (Table 8-15) that there would be no significant effects on the overall population of this species (locally or nationally) if the combination of translocation and habitat enhancement (at two other sites) were fully carried out. The Department would not disagree within this conclusion, if habitat enhancement was continued into the future. This plant species will expand if light and other conditions are suitable, and existing populations have been seen to respond readily to drain clearing previously. If successful re-introduction to the new King's Island drainage ditch was also carried out, then continued habitat enhancement at other sites, in the event of total failure of translocation, would not be necessary.

**The following type of condition is therefore recommended:**

Prior to the commencement of construction, a detailed survey of the open drainage ditch marked in Drawing KIFRS-A-004 accompanying the planning application, for the protected plant Opposite-leaved pondweed (*Groenlandia densa*) will be carried out, at the appropriate time of year, by a competent experienced botanist. The provisions of the licence application Methods Statement in Appendix 3 of the EIAR will be revised as a Construction Management Plan in consultation with the appointed contractor and with the NPWS. Storage times of translocated plants or wetland soil will be minimised wherever feasible. Habitat enhancement of two existing sites, which have declining subpopulations of existing opposite-leaved pondweed, will be carried out outside the development site. The success of translocation will be monitored, and if it is found to fail, then four years after creation of the new drainage ditch, habitat creation and re-introduction at the new drainage ditch will be carried out, under licence from the NPWS. This will also be monitored and managed two years after completion. If it too is not successful, the habitat enhancement at the two sites will be continued.



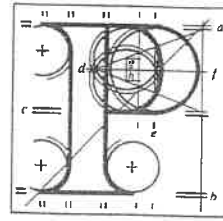
You are requested to send further communications to this Department's Development Applications Unit (DAU) at **manager.dau@chg.gov.ie** (team monitored); if this is not possible, correspondence may alternatively be sent to:

The Manager  
Development Applications Unit (DAU)  
Department of Culture, Heritage and the Gaeltacht  
Newtown Road  
Wexford  
Y35 AP90

Is mise, le meas

A handwritten signature in black ink, which appears to read 'Diarmuid Buttimer', is written over a horizontal line.

Diarmuid Buttimer  
Development Applications Unit



Development Applications Unit  
c/o Sinéad O'Brien, Department of Culture, Heritage and the Gaeltacht  
Newtown Road  
Wexford  
Co. Wexford

**Date:** 17 February 2020

**Re:** Flood protection measures around King's Island.  
King's Island, Limerick.

A Chara,

An Bord Pleanála has received your submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

The Board will revert to you in due course in respect of this matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of Limerick City and County Council and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: [www.pleanala.ie](http://www.pleanala.ie).

If you have any queries in the meantime please contact the undersigned officer of the Board. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Le meas,

Rob Mac Giollarnáth  
Executive Officer  
Direct Line: 01-8737247

Tel	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
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Your Ref: ABP-306270-19

Our Ref: **177AE King's Island Flood Relief**  
(Please quote in all related correspondence)

14 February 2020

The Secretary  
An Bord Pleanála  
64 Marlborough Street  
Dublin 1  
D01 V902  
Via email to [sids@pleanala.ie](mailto:sids@pleanala.ie)

Re: Notification to the Minister for Culture, Heritage and the Gaeltacht under the Planning and Development Act, 2000, as amended.

**Re: Section 177AE application by Limerick City and County Council for the King's Island Flood Relief Scheme and archaeological testing programme**

A chara

On behalf of the Department of Culture, Heritage and the Gaeltacht, I refer to correspondence received in connection with the above.

Further to the Nature Conservation observations that were submitted to you earlier this afternoon please find outlined below further heritage-related observations/recommendations of the Department under the stated heading.

#### **Underwater Archaeology**

Having considered the proposed works for King's Island Flood Relief Scheme and the Cultural Heritage Section of the Environmental Impact Assessment Report (EIAR), with its attendant recommended archaeological mitigation, the following are the observations and recommendations of the National Monument Service (NMS) section of the Department. For clarity, they follow the area breakdown as detailed in the Cultural Heritage section of the Environmental Impact Assessment (EIA).

#### **OVERVIEW**

##### **Project Archaeologist:**

It is strongly recommended, and in keeping with the recommendation made in the EIAR, that a Project Archaeologist be engaged to manage the archaeological mitigation of King's Island Flood Relief Programme of Works. The Project Archaeologist should be suitably qualified and experienced, including having experience of carrying out management of



flood relief works and implementing mitigation strategies in relation to underwater cultural heritage. It is the advice of this Department that a Project Archaeologist be engaged as soon as possible in order to ensure that appropriate mitigation strategies, as agreed, are in place and to oversee their implementation. This will involve on-going liaison with the archaeological contractors carrying out the mitigation and availability to advise Limerick City Council and the Office of Public Works (OPW). The Project Archaeologist, as part of their role, will also liaise with the National Monuments Service section of this Department on behalf of Limerick City Council and the OPW.

**Archaeological Mitigation:**

All archaeological contractors engaged to carry out archaeological mitigation on the ground should be suitably qualified and experienced in the type of environment the work is being carried out in, including works in the foreshore/intertidal, subtidal and riverine areas. Sufficient teams of suitably qualified and suitably experienced archaeologists should be on site to cover all elements of the works, including all machinery, etc. A monitoring strategy should be included with the licence application method statement; to be updated as contractors are engaged on site; such a strategy should include communications with plant and machinery operatives, extent and nature of machinery on site, locations for excavated spoil to allow for metal detection (see below), etc. These details can be agreed/devised by the Project Archaeologist, should one be engaged, as part of the archaeological works/mitigation strategy and submitted to the National Monuments Service section of this Department for agreement in advance to prevent delays when contractors arrive on site.

All archaeological testing and monitoring shall be licensed by the Department of Culture, Heritage and the Gaeltacht and a detailed method statement shall accompany the licence application. The mitigation shall also include a Find's Retrieval strategy that includes the spreading of all excavated material and the metal detection of that material for artefactual remains. Again, the Project Archaeologist, if engaged, can devise the strategy for this and advise on same, on behalf of Limerick City Council/OPW.

A large proportion of the proposed test trenches and any future testing/excavation, will be in an area that was formally foreshore/intertidal zones. All excavation strategies therefore should make provision for the full handling of water ingress, to ensure that any identified lower stratigraphic courses, sections and base of trenches can be accessed by the archaeologist, properly inspected & fully recorded. Such provision should also include the proper handling of organic material that could be discovered in the anaerobic estuarine conditions.

**Underwater Archaeological Impact Assessment (UAIA):**

In June and August 2019 an Underwater Archaeological Impact Assessment (UAIA) was recommended by the National Monuments Service section of this Department as part of the consultation process for the EIAR. This has not been carried out but there is a recommendation for such in the EIAR. It is clear that there are to be impacts to the intertidal zones and the Abbey River and Shannon River for storage tanks, outfalls and spud leg





barges. The full nature and extent of these works has not been fully detailed, but the potential for underwater cultural heritage to be present in these areas that could be impacted, particular the River Shannon and in areas of the Abbey River not previously excavated, remains extremely high. It is therefore, again, recommended that a UAIA is carried out as soon as possible to inform the final design phase of the proposed Flood Relief Works for King's Island. As part of the role of the Project Archaeologist, should one be engaged, they would advise on the strategy for the UAIA.

### **Architectural Heritage**

It is noted that there is to be an impact to historic quay walls and quays. The services of a suitably qualified and experienced conservation architect should be engaged to submit a strategy for the architectural conservation, recording and protection of any of these historic structures that might be impacted, prior to and during works. All proposed works should seek to retain the historic character of the quays and walls and any quay furniture within the footprint of works. The conservation architect can advise accordingly.

### **'Dig-out' for supporting walls behind Historic Quays:**

The proposed excavations for the support walls behind the historic quays will be deep and therefore there is a high potential to impact previously unrecorded archaeology. It is acknowledged that there is little logistical scope for archaeological testing in advance of construction works commencing, and there is therefore a need to have an archaeological strategy in place to address any potential discoveries in order to fully mitigate same and prevent undue delays to the flood relief works. The strategy should be devised and submitted to the National Monuments Service section of this Department for agreement, ideally via a Project Archaeologist, and should include archaeological monitoring, and recommendations for full recording and mitigation of all identified archaeology.

### **Onsite storage and post-excavation strategy:**

Suitable on-site temporary storage that is secure should be in place in advance of all archaeological excavation works to ensure any material recovered can be placed in suitable tanks or holding facilities; they should be able to accommodate waterlogged material, organic material, etc. As part of all testing and monitoring methodologies, particularly for the full works, a strategy that includes post-excavation processing of finds should be included; ideally, such post-excavation work should begin in a timely manner during the course of the Flood Relief Scheme construction Phase. The need therefore to have suitable facilities and personnel in place to carry out the work should be identified as part of the archaeological methodology.

## **SPECIFICS**

### **Area A1 Thomond Bridge to Verdant Place**

- Although the proposed works here are of minimal impact with regard to ground works, should design change or contractor needs require ground works, all such



works are required to be archaeologically monitored by a suitably qualified and suitably experienced archaeologist.

**Area A2 Verdant Place steps and crèche**

- Archaeological monitoring as proposed is agreed.

**Area A3 North West Embankment & Area A4 North East Embankment**

- The works here should be subject to archaeological monitoring.

**Area A5 Star Rovers to Athlunkard Boat Club; Area A6 Athlunkard Boat Club**

These areas are of high archaeological potential, Athlunkard being directly linked with the Viking origins of Limerick City. There is therefore the potential that sites or material relating to maritime activity, including Athlunkard as a longphort, with potential for the remains of wrecks, nausts other structural remains or artefacts, etc. to be present and the original Viking settlement in Limerick could be located within the footprint of the proposed works. Similarly archaeological features and finds relating to the walled city of Limerick and its maritime history could also be found in the locations of the proposed works.

The following is therefore recommended:

- A strategy for archaeological testing to be submitted along the line of the proposed flood works in areas that can be investigated in advance of the constructional phase.
- Outfalls are proposed into the Abbey River to replace existing or increase the size of existing pipes, along with an intertidal storage tank. Further information is required on these, with respect to actual works, e.g. are there to be impacts into the intertidal zone/Abbey River and, if so, what is the nature and extent of works, etc.?

**Area A7 Sir Harry's Mall**

- Although proposed works here are of minimal impact with regard to ground works, should design change or contractor needs require ground works, all such works are required to be archaeologically monitored by a suitably qualified and suitably experienced archaeologist.

**Area A8 Absolute Hotel Boardwalk**

- Although proposed works here are of minimal impact with regard to ground works, should design change or contractor needs require ground works, all such works are required to be archaeologically monitored by a suitably qualified and suitably experienced archaeologist.

**Area A9 Absolute Hotel Boardwalk to Abbey Bridge & Area A10 Abbey Bridge to Baal's Bridge**

- Archaeological monitoring is recommended here and agreed.
- The impact into the river by the barge should be subject to UAIA as should any outfall works that may also run into the intertidal zone or into the river.



#### **Areas B1 & B2 George's Quay**

- Archaeological monitoring is proposed here and agreed for all excavation works.
- There are proposed works for outfall pipes into the Abbey River in this area and the nature and extent of these works needs to be more fully explained. The UAIA should address this.

#### **Area B3 Potato Market to King John's Castle**

- The proposed archaeological testing for this area is agreed.
- It is highlighted that there is potential for negative impacts on the underwater cultural heritage from the proposed intertidal works for the storage tank. There are also other works proposed in the foreshore, including the use of spud leg barges and a number of outfall pipes, including one near King John's Castle.
- The areas to be impacted in the foreshore and subtidal areas (if any) should be subject to a UAIA to inform on design in tandem with the archaeological testing, the objective of which is to do the same.

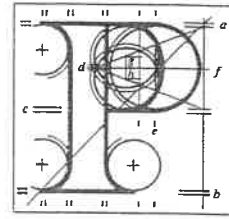
You are requested to send further communications to this Department's Development Applications Unit (DAU) at the following address:

The Manager  
Development Applications Unit (DAU)  
Department of Culture, Heritage and the Gaeltacht  
Newtown Road  
Wexford  
Y35 AP90

Is mise, le meas

---

Sinéad O' Brien  
Development Applications Unit



Limerick City & County Council  
c/o Séamus Hanrahan, Design and Delivery Services  
Merchant's Quay  
V94EH90  
Co. Limerick

**Date:** 17 February 2020

**Re:** Flood protection measures around King's Island.  
King's Island, Limerick.

A Chara,

An Bord Pleanála has received your submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

The Board will revert to you in due course in respect of this matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of Limerick County Council and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: [www.pleanala.ie](http://www.pleanala.ie).

If you have any queries in the meantime please contact the undersigned officer of the Board. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Rob Mac Giollarnáth  
Executive Officer  
Direct Line: 01-8737247

Teil	Tel	(01) 858 8100
Glaic Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902



Comhairle Cathrach  
& Contae **Luimnigh**

**Limerick City**  
& County Council

Seirbhísí Dearaidh agus Soláthair,  
Comhairle Cathrach agus Contae Luimnigh,  
Cé na gCeannaithe, Luimneach V94 EH90

Design and Delivery Services,  
Limerick City and County Council,  
Merchants Quay, Limerick, V94 EH90

t: +353 (0) 61 55 7180

An Bord Pleanála,  
64 Marlborough Street,  
Dublin 1.  
D01 V902

14<sup>th</sup> February 2020

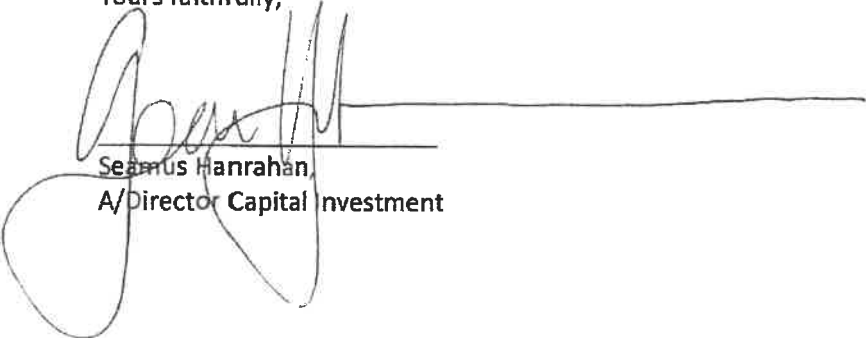
By email  
[sids@pleanala.ie](mailto:sids@pleanala.ie)  
[bord@pleanala.ie](mailto:bord@pleanala.ie)

**ABP Case Number: ABP-306270-19**  
**Re: Flood protection measures around King's Island.**  
**King's Island, Limerick**

Dear Sir/Madam,

I refer to Limerick City and County Council's application, under Section 226 of the Planning and Development Act (as amended), for approval of a proposed flood defence scheme at King's Island, Limerick. Please find enclosed a letter of consent from Limerick Market Trustees to carry out works in Potato Market, Merchant's Quay, Limerick.

Yours faithfully,

  
Seamus Hanrahan  
A/Director Capital Investment

Ceanncheathrú Chorpáraideach,  
Cé na gCeannaithe, Luimneach  
Corporate Headquarters,  
Merchants Quay, Limerick

email: [customerservices@limerick.ie](mailto:customerservices@limerick.ie)  
web: [www.limerick.ie](http://www.limerick.ie)  
twitter [@LimerickCouncil](https://twitter.com/LimerickCouncil)  
tel: +353 (0) 61 556000



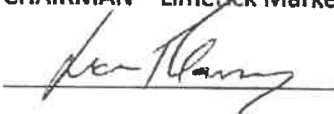
## LIMERICK MARKET TRUSTEES

To whom it may concern

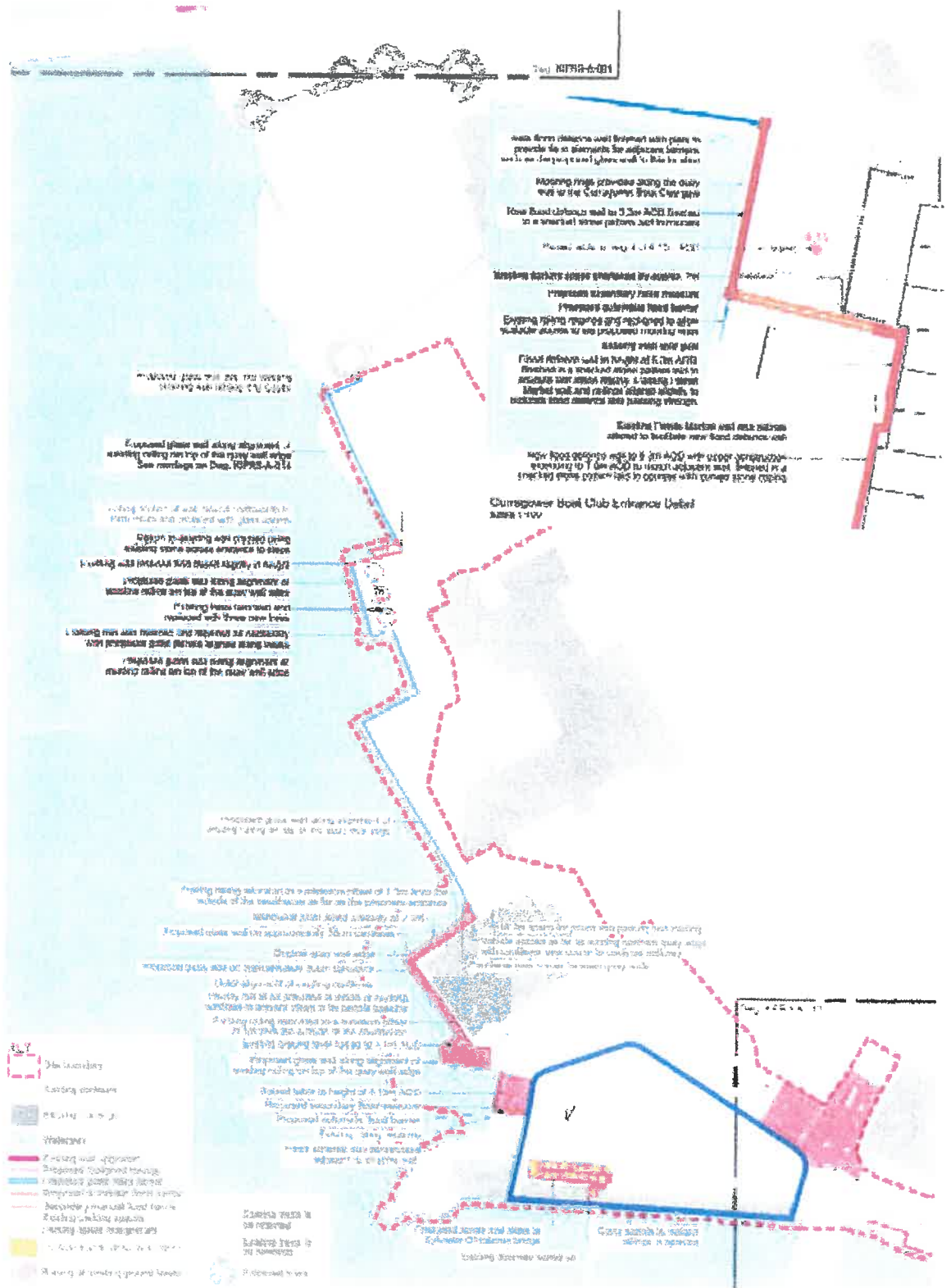
**King's Island Flood Relief Scheme  
Application of Limerick City and County Council to An Bord Pleanála**

Dear Sir/Madam,

The Limerick Market Trustees Company owns The Potato Market at Merchant's Quay, as shown outlined in blue on the attached drawing. The Limerick Market Trustees consent to the application by Limerick City and County Council to An Bord Pleanála under reference APB-306270-19.

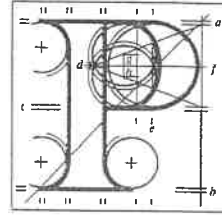
Name	Liam Flannery
Position	CHAIRMAN – Limerick Market Trustees
Signature	
Date	<u>14<sup>th</sup> February 2020</u>

**Limerick Market Trustees,  
Milk Market House,  
The Milk Market,  
Limerick V94 TX29**



Clubhouse Boat Club Entrance Detail  
Scale 1:100

**Our Case Number:** ABP-306270-19



**An  
Bord  
Pleanála**

Limerick City & County Council  
Séamus Hanrahan, Delivery and Design Services,  
Merchant's Quay  
V94EH90  
Co. Limerick

**Date:** 17 February 2020

**Re:** Flood protection measures around King's Island.  
King's Island, Limerick.

A Chara,

An Bord Pleanála has received your submission from Sarah McCutcheon in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

The Board will revert to you in due course in respect of this matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of Limerick City and County Council and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: [www.pleanala.ie](http://www.pleanala.ie).

If you have any queries in the meantime please contact the undersigned officer of the Board. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Rob Mac Giollarnáth  
Executive Officer  
Direct Line: 01-8737247

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Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

64 Sráid Maoilbhríde	64 Marlborough Street
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Comhairle Cathrach  
& Contae **Luimnigh**

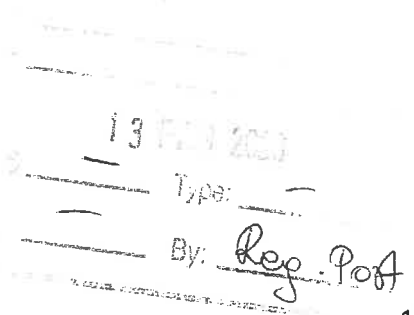
**Limerick City  
& County Council**

Seirbhísí Dearaidh agus Soláthair,  
Comhairle Cathrach agus Contae Luimnigh,  
Cé na gCeannaithe, Luimneach V94 EH90

Design and Delivery Services,  
Limerick City and County Council,  
Merchants Quay, Limerick, V94 EH90

t: +353 (0) 61 55 7180

An Bord Pleanála,  
64 Marlborough Street,  
Dublin 1.  
D01 V902



12<sup>th</sup> February 2020

By registered post and email [sids@pleanala.ie](mailto:sids@pleanala.ie)

**ABP Case Number: ABP-306270-19**  
**Re: Flood protection measures around King's Island.**  
**King's Island, Limerick**

Dear Sir/Madam,

I refer to Limerick City and County Council's application, under Section 226 of the Planning and Development Act (as amended), for approval of a proposed flood defence scheme at King's Island, Limerick. Please find enclosed a submission received from internal referrals within the Council.

**Submission No. 1 Ms. Sarah McCutcheon, Local Authority Archaeologist, Limerick City and County Council, Merchant's Quay, Limerick**

King's Island Flood Relief Scheme: The scheme is located within the historic core of Limerick City and is adjacent in places to the town defences which are deemed National Monuments, it is also close to other National Monuments such as King John's Castle and St. Mary's Cathedral. All works, both pre-development test investigations and construction works will require Ministerial Consent under the National Monuments Act 2004 Amendment.

Mitigation: A full archaeological desk-top assessment of the implications of the scheme was undertaken on behalf of Limerick City & County Council by Moore Group in conjunction with the Council Archaeologist. Some installations were re-positioned to lessen the effect on potential archaeological remains. A comprehensive test trenching strategy has been devised. This will commence shortly, once Ministerial Consent is received. The results of the test trenching will inform the final design and may allow for further mitigation by redesign to avoid certain features or in the form of advance archaeological excavation where it is deemed appropriate. All of these decisions will be in consultation with the Department of Culture, Heritage & the Gaeltacht. The National Policy on Town Defences (2008) will be adhered to and the line of the City Wall will be respected throughout. On the north end of King's Island, all of the ground associated with the development will be top soil stripped under archaeological monitoring. In addition to advance works, the entire construction phase will also be archaeologically monitored.

Yours faithfully,

Seamus Hanrahan  
A/Director Capital Investment

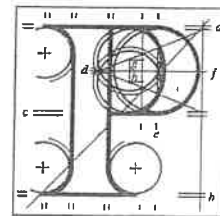
Ceanncheathrú Chorpáirídeach,  
Cé na gCeannaithe, Luimneach

Corporate Headquarters,  
Merchants Quay, Limerick

email: [customerservices@limerick.ie](mailto:customerservices@limerick.ie)  
web: [www.limerick.ie](http://www.limerick.ie)

twitter [@LimerickCouncil](https://twitter.com/LimerickCouncil)  
tel: +353 (0) 61 556000

Our Case Number: ABP-306270-19



An  
Bord  
Pleanála

Curraghbour Boat Club  
c/o Brian Hickey, Secretary of Curraghbour Boat Club  
Rathuard  
Ballysheedy  
Co. Limerick

Date: 17 February 2020

Re: Flood protection measures around King's Island.  
King's Island, Limerick.

A Chara,

An Bord Pleanála has received your submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

The Board will revert to you in due course in respect of this matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of Limerick County Council and at the offices of An Bord Pleanála when they have been processed by the Board:

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: [www.pleanala.ie](http://www.pleanala.ie).

If you have any queries in the meantime please contact the undersigned officer of the Board. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Rob Mac Giollarnáth  
Executive Officer  
Direct Line: 01-8737247

Tel	Tel	(01) 858 8100
Glaos Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902



# Curraghbour Boat Club



Chairman: Matty Benn  
Craven Cottage  
Main St.  
Kilkishen,  
Co. Clare  
086-8867458

Merchants Quay  
Limerick  
Ireland

Secretary: Brian Hickey  
Rathuard  
Ballysheedy  
Co. Limerick  
087-6343753

04/02/2020

To:  
Strategic Infrastructure Development Section  
An Bord Pleanála  
64 Marlborough Street  
Dublin 1  
D01 V902

**AN BORD PLEANÁLA**  
LDG- 024233-20  
ABP- \_\_\_\_\_  
07 FEB 2020  
Fee: € 50 Type: PMO  
Time: - By: Reg. Post.

Submission to planning application 306270: King's Island, Limerick.

Limerick City and County Council

*"Limerick City and County Council*

*Flood protection measures around King's Island.*

*Case reference: PL91 .306270*

*Case type: LA Foreshore Dev - Application*

*Status: Case is due to be decided by 18/06/2020"*

## Introduction

The Curraghgour Boat club is located on Kings Island in Limerick at Merchants Quay. It has been in existence since 1877 (page 310 of King's Island Flood Relief Scheme Environmental Impact Assessment Report, Volume 2 - EIAR Report Final Report December 2019). The boat club is in area B3 and is included in drawing number: KIFRS-A-011-PL2 KIFRS Proposals Layout 10 of 10 (attached to this submission).

The boat club is the sole owner of the property and its grounds. As can be seen from the drawing, there is only one available access to the club and the proposed development would form a barrier to this access. This takes away the right of way of each member to access the boat club.

The club is objecting to the following:

1. To the erection of a barrier to the club. As can be seen in drawing number KIFRS-C-118\_PL1 (attached), the council proposes the installation of an automatic tilt up flood barrier with manual backup. This removes the sole access to the boat club by its members.
2. The position of the proposed ramp is too close to the existing boat club gate. The ramp is located at the point where a trailer carrying a boat, is removed from its towing vehicle to allow a boat to be put into or removed from the club. It is also too high at a proposed height of 30cm. The plan for the ramp does not comply with regulations. See the following -

As per S.I. No. 32/1988 - Road Traffic (Bollards and Ramps) Regulations, 1988.

*2. Where ramps are provided, they shall not be positioned—*

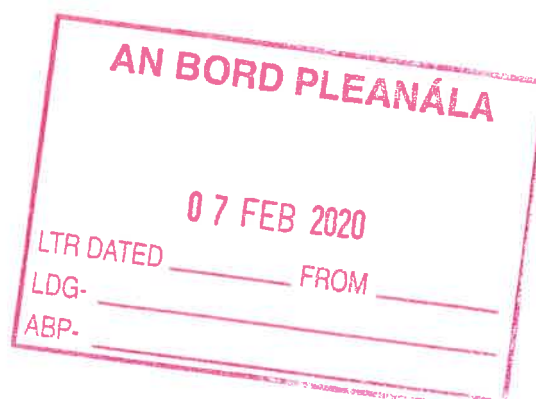
*(a) So as to obstruct an entrance for vehicles to premises or land adjoining the road,*

*5. Each ramp shall—*

*(d) Have a maximum height at the centre above the road surface of 10 centimetres,*

*1. Ramps shall be provided in the following manner:—*

*(1) There shall be a distance of at least 20 metres and not more than 200 metres between any two ramps on any roadway.*



3. The proposed automatic barrier causes a hazard to vehicles including trailers and cars parked outside the club while waiting for access. There should not be any automatic system put in place. It is also estimated that the flood barrier would be used for a one in ten-year event. This would be an unacceptable risk as the system would not be used and tested adequately to prove its reliability over a long period. According to the Environmental Impact Assessment Report, Volume 1 – Non Technical Summary, Final Report, December 2019, page 2;

*“The scheme proposed herein is designed to provide protection to properties in the Study area from the 1 in 200 year tidal flood event.”*

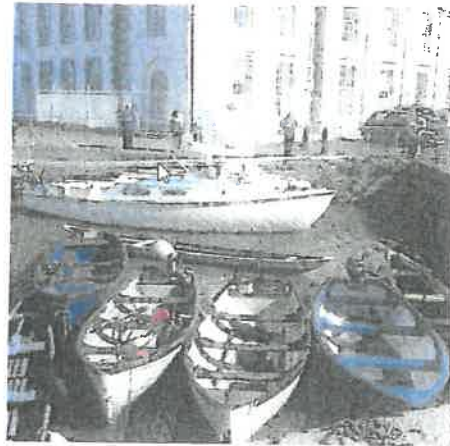
In terms of climate change, there is no significant risk. Page 14;

*“The residual impact to climate vulnerability during the operation of the scheme is Not Significant in the Long Term (i.e., the appraisal period of approximately 50 year), and Adaptable to climate change. Beyond the Long Term (past the appraisal period of 50 years), the scheme is considered to be Moderately Vulnerable, and Slightly Adaptable to the effects of climate change if mitigation measures and monitoring are implemented.”*

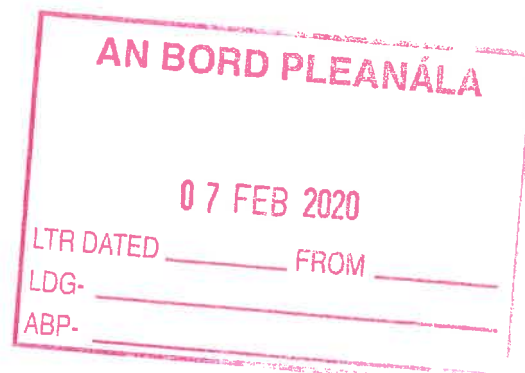
4. Ladder access to the club while the barrier would not be suitable. There are elderly and disabled members of the club who have their own right of access. As can be seen in drawing number KIFRS-C-118\_PL1 (attached), there is a ladder shown for access over the barrier on one side only. How is it intended for an elderly person exiting the premises to get off a wall? Any ladder, wheel chair ramp or other system that allows people to go above ground level must also be built so as not to allow or aid unauthorised access to the boat club.

<b>AN BORD PLEANÁLA</b>	
<b>07 FEB 2020</b>	
LTR DATED _____	FROM _____
LDG- _____	
ABP- _____	

5. The proposed wall on the quayside would remove access to the harbour for boats. The Curraghgour boat club has been using the quay for boats for over 100 years. This is shown below and is referenced in plate 14 – 48 page 311 of King’s Island Flood Relief Scheme Environmental Impact Assessment Report, Volume 2 - EIAR Report Final Report December 2019.



6. The outflow to the harbour/beach area would be a hazard. The outflow from the intertidal storage tank to the petrol interceptor would be to the harbour. This is a slack area in terms of tidal flow. Waste would accumulate in this area, as there is not enough water current to remove it. It would affect the use of boats as can be seen in item 5 above. Also, see drawing no KIFRS-C-215 PL1.
7. There is a bollard for mooring boats located at the corner of the harbour. This is a protected historical structure. There is no mention of it been protected in the drawings. This bollard is the only secure mooring in the harbour. It was used by the Limerick Fire Brigade to secure a pontoon recently. The pontoon had broken its mooring, would have crashed into Sarsfield Bridge, and could have done a large amount of damage. It is shown on plate 14-31, page 333 of King’s Island Flood Relief Scheme Environmental Impact Assessment Report, Volume 2 - EIAR Report Final Report December 2019.



## Conclusion

The Curraghgour boat club does not oppose the Kings Island Flood Defence works in principal. It would like the defences at the location of the club to be designed and built to a higher standard in terms of the historic location and how it functions as an amenity. The risk of flooding, though real, is not of a significant level to justify the damage to a local boat club that has been in existence since 1877. The club has put forward its own proposals to the council, and is prepared to explore options that are better suited for the area.

Signed:

*Brian Hickey*

Brian Hickey  
Curraghgour Boat Club Secretary,  
Rathard,  
Ballysheedy,  
Co. Limerick,  
087-6343753  
[hickey.brian86@gmail.com](mailto:hickey.brian86@gmail.com)

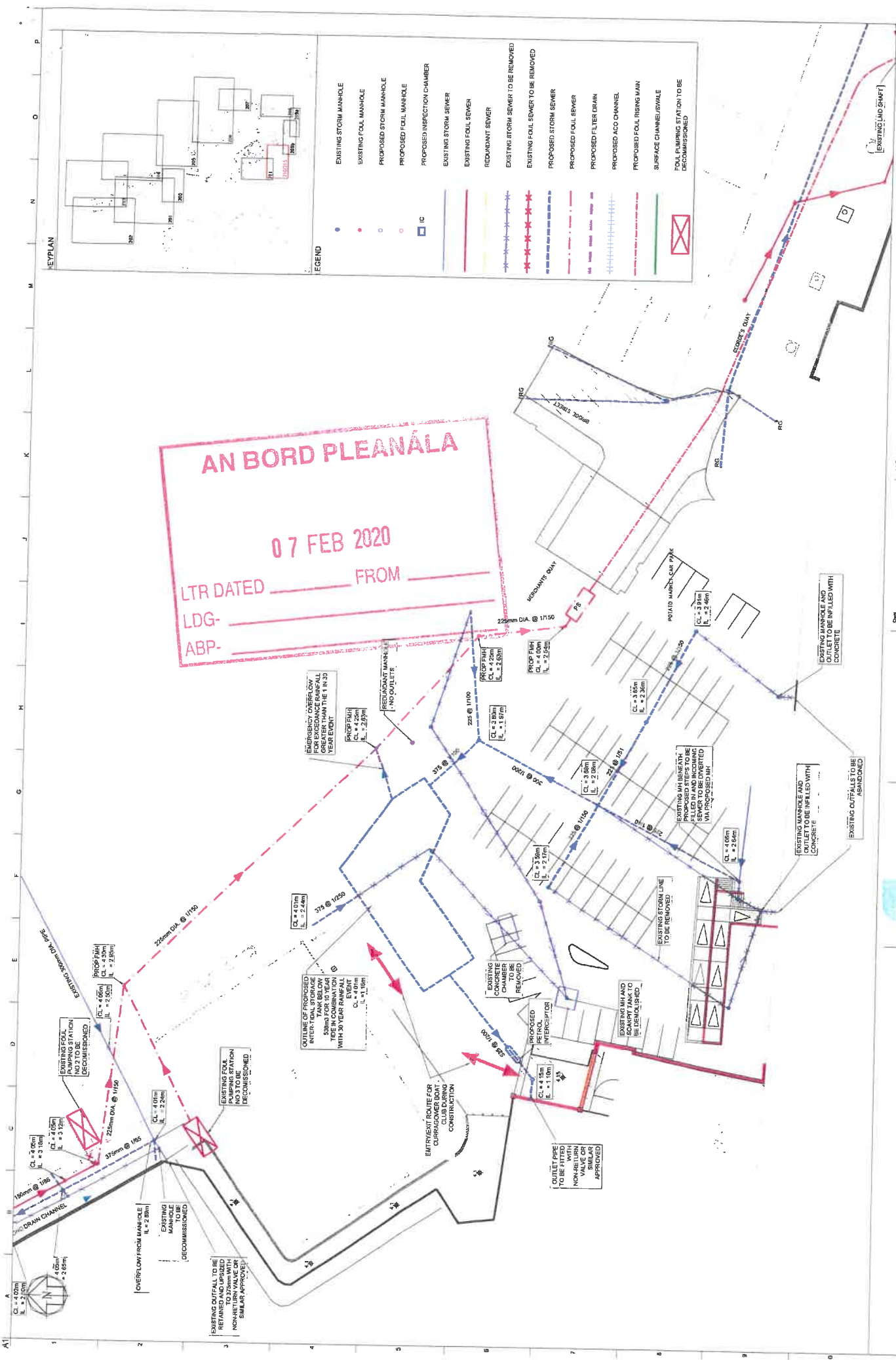
AN BORD PLEANÁLA

07 FEB 2020

LTR DATED \_\_\_\_\_ FROM \_\_\_\_\_

LDG- \_\_\_\_\_

ABP- \_\_\_\_\_



AN BORD PLEANÁLA

07 FEB 2020

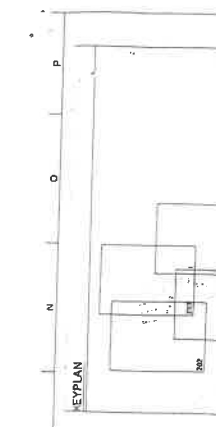
LTR DATED \_\_\_\_\_ FROM \_\_\_\_\_

LDG- \_\_\_\_\_

ABP- \_\_\_\_\_

**LEGEND**

- EXISTING STORM MANHOLE
- EXISTING FOUL MANHOLE
- PROPOSED STORM MANHOLE
- PROPOSED FOUL MANHOLE
- PROPOSED INSPECTION CHAMBER
- EXISTING STORM SEWER
- EXISTING FOUL SEWER
- REDUNDANT SEWER
- EXISTING STORM SEWER TO BE REMOVED
- EXISTING FOUL SEWER TO BE REMOVED
- PROPOSED STORM SEWER
- PROPOSED FOUL SEWER
- PROPOSED FILTER DRAIN
- PROPOSED ACO CHANNEL
- PROPOSED FOUL RISING MAIN
- SURFACE CHANNEL/SWALE
- FOUL PUMPING STATION TO BE DECOMMISSIONED



**ARUP**

15 Riverside Road, Dublin 4  
T: +353 (0)1 454 4000  
www.arup.com

**KING'S ISLAND**

Station 1, 250  
Drogheda, Co. Dublin  
T: +353 (0)1 707 1100

**OPW**

Office of Public Works  
100, Upper Mount Street, Dublin 2  
T: +353 (0)1 454 4000

**Nicholas de Jong Associates**

URBAN DESIGN

Alternative Foul Sewer Arrangement at Pobato Market

Job No: 265545

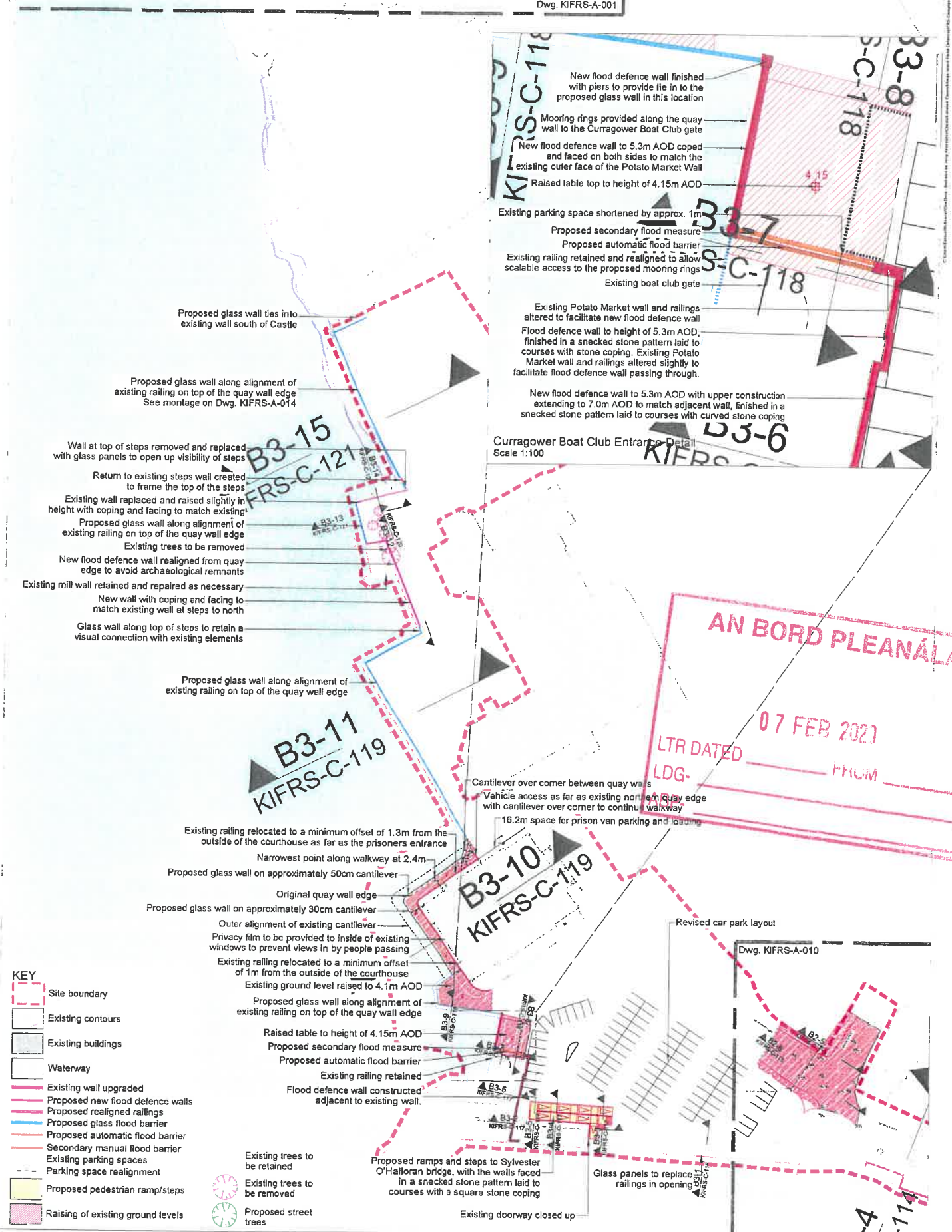
Drawing No: **PLANNING**

Client: MFRS-C-215

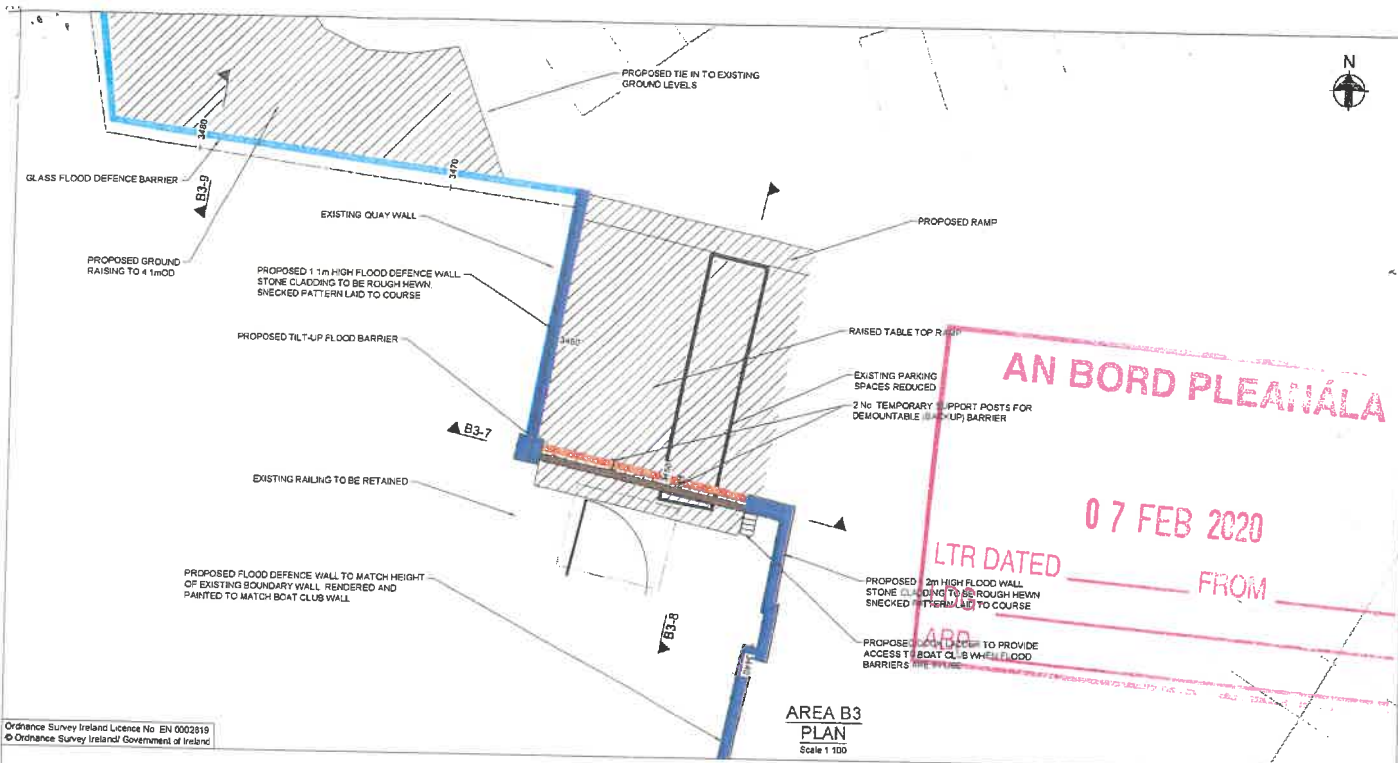
Scale: PL1

Issue	Date	By	Check	Appr



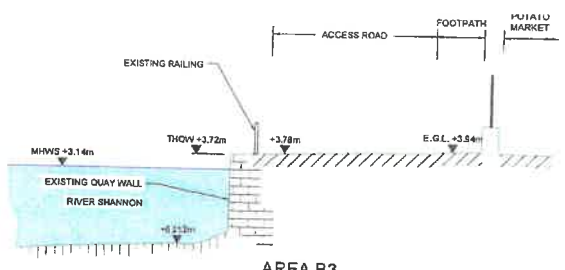


- KEY**
- Site boundary
  - Existing contours
  - Existing buildings
  - Waterway
  - Existing wall upgraded
  - Proposed new flood defence walls
  - Proposed realigned railings
  - Proposed glass flood barrier
  - Proposed automatic flood barrier
  - Secondary manual flood barrier
  - Existing parking spaces
  - Parking space realignment
  - Proposed pedestrian ramp/steps
  - Raising of existing ground levels
  - Existing trees to be retained
  - Existing trees to be removed
  - Proposed street trees

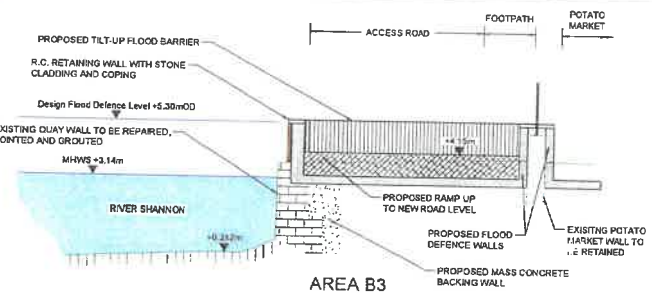


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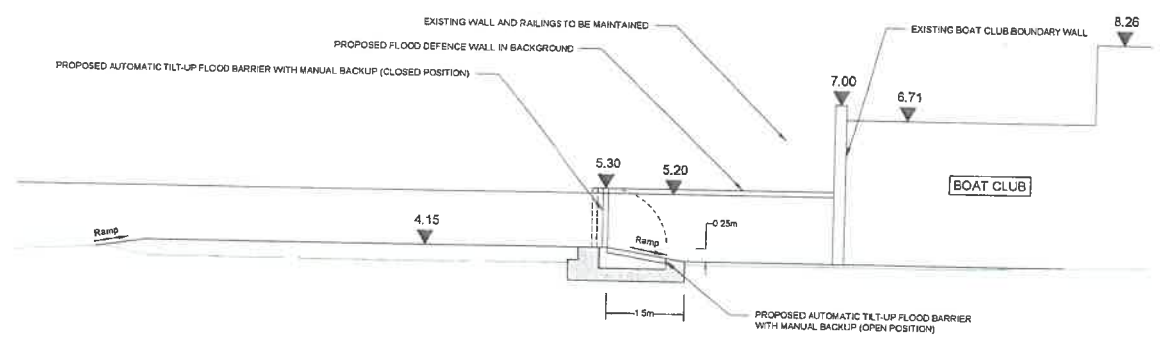
**AREA B3  
PLAN**  
Scale 1:100



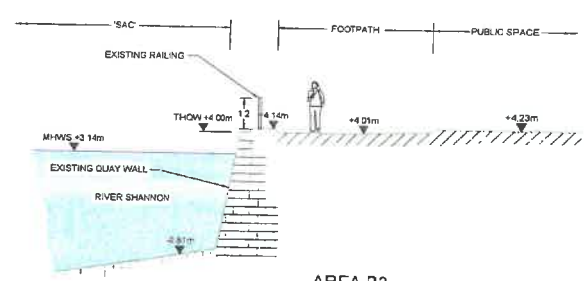
**AREA B3  
CROSS-SECTION B3-7  
CH 3445m  
EXISTING**



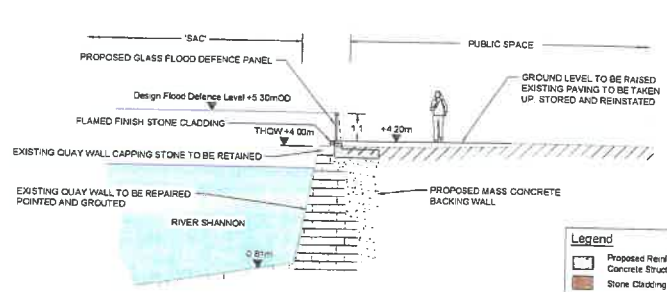
**AREA B3  
CROSS-SECTION B3-7  
CH 3445m  
PROPOSED**



**AREA B3  
CROSS-SECTION B3-8  
RAISED ROAD**  
Scale 1:50



**AREA B3  
CROSS-SECTION B3-9  
CH 3479m  
EXISTING**



**AREA B3  
CROSS-SECTION B3-9  
CH 3479m  
PROPOSED**

**Legend**

- Proposed Reinforced Concrete Structure
- Stone Cladding
- Coping
- Proposed Bitmac Surface and Base
- Top of Existing Quay Wall (approx. level)

**NOTES**  
1 ALL LEVELS SHOWN ARE TO ORDNANCE DATUM MAIN HEAD  
2 THIS DRAWING TO BE READ IN CONJUNCTION WITH ALL RELEVANT PLANNING DRAWINGS AND DOCUMENTS

**Nicholas de Jong Associates  
URBAN DESIGN**

PL1	19/12/19	TD	MM	KL
Issue	Date	By	Check	Appr

**OPW**

**KING'S ISLAND**

Scale: A1:1 As Shown  
Discipline: Infrastructure

**ARUP**

50 Popple Road  
Dublin 4, D04 T628, Ireland  
T: +353 1 234 4657 F: +353 1 833 3118  
www.arup.com

Drawing Title  
**Area B3  
Boat Club Access  
Plan & Sections**

Issue No  
**265545**

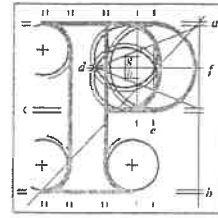
Drawing Status  
**Planning**

Drawing No  
**KIFRS-C-118**

Rev: **PL1**

N:\Projects\2019\KIFRS-C-118\Drawings\KIFRS-C-118.dwg

**Our Case Number:** ABP-306270-19



An  
Bord  
Pleanála

St. Mary's Area Integrated Development CLG  
c/o Marian Healy, The Widows Alms Houses  
Nicholas St  
King's Island  
Co. Limerick  
V94 W2P1

**Date:** 17 February 2020

**Re:** Flood protection measures around King's Island.  
King's Island, Limerick.

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter. A receipt for the fee lodged is enclosed.

The Board will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of Limerick City and County Council and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: [www.pleanala.ie](http://www.pleanala.ie).

If you have any queries in the meantime please contact the undersigned officer of the Board. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Rob Mac Giollarnáth  
Executive Officer  
Direct Line: 01-8737247

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

REF: ABP-306270-19

Dear Sir or Madam,

10<sup>th</sup> February 2020.  
**AN BORD PLEANALA**  
LDG- 024279-20  
ABP- \_\_\_\_\_  
**11 FEB 2020**  
Fee: € 50 Type: CHQ  
Time: 10.43 By: Post

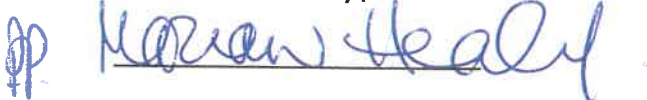
I wish to write in support of the above application and the Flood Protection Measures around King's Island, Limerick.

We are a Community Company located on the Island and are fully aware of this project and the positive consequences that it has for our local area. The project has been discussed at our Board for the last two years and we have engaged with the local community groups on an on-going basis seeking their views.

We have engaged with Limerick City and County Council with feedback and several areas of the plan have been adjusted as a result.

The Community has given its approval to this worthwhile project and our Board, after careful consideration, has also voted unanimously to lend its support to the project as a result of positive feedback from the Community.

Yours faithfully,



Marian Healy.

St. Mary's Area Integrated Development CLG

Registered Office: The Widows Alms Houses, Nicholas St, King's Island, Limerick V94 W2P1

Chairman

Telephone: 061 318106 CRO: 347666. Tax No: 6367666J

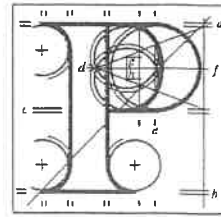
Chairperson: Marian Healy

Directors: Mary Danford, Carmel Duggan, Declan Maher, Majella O'Connor, Susan Duhig, Mary Quane, Sean Mc Glynn, Gus Clery, Lisa Griffin, Jack Bourke.

Company Secretary: Liam Lavery

Registered in Ireland

Our Case Number: ABP-306270-19



An  
Bord  
Pleanála

Maria Donoghue, Office of Regeneration,  
Housing Development Directorate, Limerick City & County Council  
Corporate Headquarters  
Merchants Quay  
Limerick  
V94 EH90

**Date:** 17 February 2020

**Re:** Flood protection measures around King's Island.  
King's Island, Limerick.

A Chara,

An Bord Pleanála has received your submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

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Yours faithfully,

Rob Mac Giollarnáth  
Executive Officer  
Direct Line: 01-8737247

Teil	Tel	(01) 858 8100
Glaic Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902



Comhairle Cathrach  
& Contae **Luimnigh**

**Limerick** City  
& County Council

Stiúrthóireacht na Forbartha Tithíochta,  
Comhairle Cathrach agus Contae Luimnigh,  
Ceanncheathrú Chorporáideach,  
Cé na gCeannaithe,  
Luimneach  
V94 EH90

Housing Development Directorate,  
Limerick City and County Council,  
Corporate Headquarters,  
Merchants Quay,  
Limerick  
V94 EH90

t: +353 (0) 61 556000

An Bord Pleanála  
64 Marlborough Street  
Dublin 1  
D01 V902

024364-20

13 FEB 2020

50 Type: PMW

Reg. PoA

**Re: Case No: ABP-306270-19 Flood protection measures around King's Island,  
King's Island, Limerick**

To whom it may concern,

My name is Maria Donoghue, and I am the Programme Manager of the Office of Regeneration, Limerick City and County Council (LCCC), Limerick City.

The Office of Regeneration is responsible for delivery of the Limerick Regeneration Programme through partnership-based structures, and is a stated objective of the Department of Housing, Planning and Local Government to ensure that regeneration is supported under the National Regeneration Programme.

The Limerick Regeneration Programme follows the Limerick Regeneration Framework Implementation Plan (LRFIP) and focuses on three key pillars: Physical, Economic and Social. The LRFIP was launched in 2013 and was adopted by the elected members of LCCC in 2014. The LRFIP concentrates on four regeneration areas – St Mary's Park, Moyross, Southill, Ballincurra Weston – and the case referred to above will impact very positively on one of these areas, St Mary's Park, Kings Island.

Objective 2.6.4.13 (Open Space and Public Realm Strategy) of the Limerick Regeneration Framework Implementation Plan 2014 states:

*“Manage the existing and future flood risk to St Mary’s Park by:*

- *Protecting the integrity of the existing flood defences and embankments*
- *Incorporate flood resistant and floor resilient measures appropriately*
- *Utilise sustainable urban drainage systems (SUDS)*
- *Establish flood warning and emergency procedures”*

The Office of Regeneration is of the view that the proposed development to construct the Kings Island Flood Relief Scheme will meet this objective. In light of the extreme flood events experienced in St Mary’s Park in 2014 and the serious disruption to life for the residents there following these flood events, the Office of Regeneration strongly welcomes this proposal.

Please find enclosed postal order for €50 for submission fee. I trust you will find this submission is in order.

Yours faithfully,

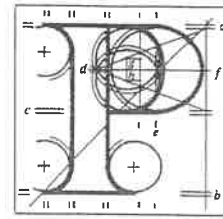


Maria Donoghue MRIAI

Programme Manager

Office of Regeneration

AN FORD PLEANÁLA	
LDG- _____	
BP- _____	
13 FEB 2020	
€ _____	type: _____
By: _____	By: _____



Irish Water  
c/o Niko Taktikos, Planning Referral Officer  
Connections and Developers Services, Colvill House  
24-26 Talbot Street  
Dublin 1

**Date:** 17 February 2020

**Re:** Flood protection measures around King's Island.  
King's Island, Limerick.

A Chara,

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Yours faithfully,

Rob Mac Giollarnáth  
Executive Officer  
Direct Line: 01-8737247

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Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Riomphost	Email	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

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Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902



An Bord Pleanála,  
64 Marlborough Street,  
Dublin 1  
D01 V902

14 February 2020

**Re: Irish Waters Response to An Bord Pleanála Reference:  
ABP-306270-19 (King's Island Flood Relief Scheme)**

Dear Sir / Madam,

Irish Water welcomes the opportunity to submit on the proposed King's Island Flood Relief Scheme and has the following comments:

The surface water drainage proposals include surface water connections and overflows to the Irish Water public foul network. It is Irish Water's policy not to accept Surface Water or Storm Water runoff into its network, and current proposals are unacceptable to Irish Water. The applicant is required to engage with Irish Water in respect of alternative proposals.

Irish Water records indicate the presence of water/waste infrastructure which may be impacted by the proposed development; therefore **Further Information is requested in relation to the following matters;**

1. The applicant shall submit a diversion enquiry to Irish Water as a significant number of water mains and foul sewers will be impacted by the proposed works and all necessary measures to protect and maintain access to Irish Water infrastructure should be undertaken.
2. The applicant shall submit a must Pre Connection Enquiry to Irish Water to assess the feasibility in respect of water and/or waste water connections for Athlunkard Boat Club.

Queries relating to the terms and observations above should be directed to [planning@water.ie](mailto:planning@water.ie)

Signed on behalf of Irish Water: Maria O'Dwyer

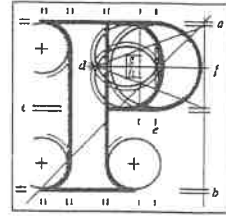


Uisce Éireann  
Bosca OP 6000  
Baile Átha Cliath 1  
D01 WA07  
Éire

Irish Water  
PO Box 6000  
Dublin 1  
D01 WA07  
Ireland

T: +353 01 89 25000  
T: +353 01 89 25001  
[www.water.ie](http://www.water.ie)

Our Case Number: ABP-306270-19



An  
Bord  
Pleanála

Andrew Curtin, Environmental Health Service  
Health Service Executive  
2nd Floor, Ashbourne Hall  
Ashbourne Business Park, Dock Road  
Limerick

**Date:** 17 February 2020

**Re:** Flood protection measures around King's Island.  
King's Island, Limerick.

A Chara,

An Bord Pleanála has received your submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

The Board will revert to you in due course in respect of this matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of Limerick and City County Council and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: [www.pleanala.ie](http://www.pleanala.ie).

If you have any queries in the meantime please contact the undersigned officer of the Board. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Rob Mac Giollarnáth  
Executive Officer  
Direct Line: 01-8737247

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902



Feidhmeannacht na Seirbhíse Sláinte  
Health Service Executive

14.02.20.

**An Bord Pleanála,  
64 Marlborough Street,  
Dublin 1**

**Re: King's Island Flood Relief Scheme  
Limerick City and County Council  
EHIS Reference: 1075**

Dear Sir/Madam

Please find enclosed the HSE Consultation Report in relation to the above application. If you have any queries regarding this report, the initial contact is Mr Andrew Curtin, Principal Environmental Health Officer, who will refer your query to the appropriate person

Yours faithfully

**Andrew Curtin  
Principal Environmental Health Officer**

Environmental Health Service  
Health Service Executive West  
Ashbourne Hall  
Ashbourne Business Park  
Dock Road  
Limerick  
V94 NPEO  
T: 00353 (0)61 461502 / 04 / 05

Seirbhíse Sláinte Comhshaoil  
Halla Ashbourne  
Páirc Gnó Ashbourne  
Bóthar an Duga  
Luimneach  
V94 NPEO  
T: 00353 (0)61 461502 / 04 / 05



Feidhmeannacht na Seirbhíse Sláinte  
Health Service Executive

Environmental Health Service  
Health Service Executive West  
Ashbourne Hall  
Ashbourne Business Park  
Dock Road  
Limerick  
V94 NPEO  
T: 00353 (0)61 461502 / 04 / 05

### Environmental Health Consultation Report

(as a statutory consultee under the Planning and Development Acts 2000 (as amended) and Regulations made thereunder)

Seirbhíse Sláinte Comhshaoil  
Halla Ashbourne  
Páirc Gnó Ashbourne  
Bóthar an Duga  
Luimneach  
V94 NPEO  
T: 00353 (0)61 461502 / 04 / 05

**Report to:** An Bord Pleanála, 64 Marlborough Street, Dublin 1

**Type of Consultation:** EIAR

**Planning Authority:** Limerick City and County Council

**EHIS Reference Number:** 1075

**Applicant:** Limerick City and County Council

**Proposed Development:** King's Island Flood Relief Scheme, Limerick

The following HSE stakeholders were made aware of the application on 30 December 2019

- Emergency Planning -Kay Kennington
- Estates – Helen Maher
- Assistant National Director for Health Protection – Kevin Kelleher / Laura Murphy
- CHO – Maria Bridgeman

#### General Introduction

This report only comments on Environmental Health impacts of the proposed development as outlined in the EIAR and the adequacy of the EIAR from the Environmental Health viewpoint. The Environmental Health Service has made observations and submissions on the following specific Environmental Health areas:

##### 1. Assessment of principle and description of the project

Limerick City and County Council has identified a need for investment in a flood relief scheme for the King's Island area of Limerick City. The Island is bounded by the River Shannon and the Abbey River, both of which are tidal. As a result, King's Island is very vulnerable to tidal and fluvial flooding. Although temporary flood defences are in place, King's Island and the surrounding area have been subject to significant flooding, most recently in 2014 and 2016.

Chapter 4 of the EIAR prepared on behalf of Limerick City and County Council contains a detailed description of the proposed King's Island Flood Relief Scheme. The requirement for the proposed scheme is described in Chapter 2.3 'The Need for the Proposed Project'.

The proposed Flood Relief Scheme works comprise *'a series of flood defences positioned around King's Island comprising both new and upgraded flood walls (incorporating transparent panels in the urban areas) and earth embankments plus associated public realm improvements.'*

Proposed works include

- Replacement of existing embankment with new concrete wall structure
- Provision of a footpath and cycle path
- Provision of new embankment at sports fields
- Construction of a new sewer system for Athlunkard Boat Club which will be connected to the Limerick Mains Sewerage Scheme
- Raising, strengthening and replacement of walls and raising of footpaths and boardwalk access landings
- Provision of glazed viewing panels in parts of the flood relief walls
- Provision of an automatic and manual flood gate

Each phase of the proposed Flood Relief Scheme is detailed in the EIAR and accompanying plans, drawings and photomontages.

It is anticipated that the construction phase of the proposed flood relief scheme will take approximately eighteen months.

The Environmental Health Service (EHS) notes the impact of previous flood events on the residents and businesses in King's Island and welcomes the proposed flood relief scheme. The requirement for a flood relief scheme for King's Island and a detailed description of the proposed works is described in the EIAR.

## **2. Assessment of later consents**

From the information contained in the EIAR concerning emissions to surface and ground water and emissions to air (including noise, vibration and dust) it is not anticipated that later consents will be required. It is noted that a new sewer system will be provided for the Athlunkard Boat Club which will be connected to the main Limerick sewerage system. Concrete and stone waste resulting from the reconstruction of the flood walls will be reused where possible for the construction of site access tracks. Any material not used will be removed off site to a licenced waste facility. Any soil materials not used for the construction of embankments will be screened and taken to a soil recovery facility. Soil materials considered to be contaminated will be disposed of at a licenced hazardous landfill site.

## **3. Assessment of Public Consultation and Non-Technical Summary**

Chapter 5 of the EIAR 'Consultation' details the key stakeholders and statutory bodies which were consulted in the preparation of the application prior to its submission to An Bord Pleanála. Initial consultation was undertaken with statutory and non –statutory bodies as part of the Scoping process. A list of the twenty five statutory and twenty eight non-statutory bodies consulted is included in Chapter 5.3 'Consultation'. Detailed responses were received from the Department of Culture, Heritage and the Gaeltacht (including National Parks and Wildlife Service); the ESB, Fáilte Ireland, Geological Survey of Ireland, Inland Fisheries Ireland, Limerick City and County Council (Archaeology and Planning and Environmental Services) and Transport Infrastructure Ireland.

Table 5.2 'Summary of issues raised through statutory consultation' describes how the matters mentioned in correspondence from statutory and non-statutory consultees are addressed in the EIAR. A number of the initial design elements have been amended or scoped out of the final EIAR following submissions from consultees.

Chapter 5.3.4 'Public Consultation' states that there have been four public information days to date on the proposed King's Island Flood Relief Scheme. Events were held on

- October 2015 - Initial Public Information Day
- March 2016 – Verdant Place Public Consultation Day
- December 2017 – Emerging Preferred Option Public Information Day
- August 2019 – Final Public Information Day on Preferred Option

The four public information events were advertised extensively in social media, through a stakeholder advisory group, word of mouth, leaflets, newspapers and posters. In addition to the public information events, it is noted that there is a dedicated website for the project ([www.kingsislandfrs.ie](http://www.kingsislandfrs.ie)), a link to this website from Limerick City and County Council's homepage and a King's Island Flood Relief Scheme Facebook page.

The Environmental Health Service is satisfied that meaningful consultation has been undertaken with statutory and non-statutory agencies and with the local community in the preparation of the EIAR for the King's Island Flood Relief Scheme.

**The Environmental Health Service recommends that a dedicated member of the construction team has specific responsibility for dealing with any potential complaints and queries which may arise during the construction phase of the project, and that the local community are informed of the timing, nature and extent of the proposed works via regular updates on local radio, newspapers, the project website and appropriate social media channels. It is recommended that 24 hours' notice is given in advance of critical phases of the work which may have significant impacts on sensitive receptors.**

#### **4. Assessment of consideration of alternatives**

Stage 1 of the project was the 'Development of a number of flood relief options and the identification of a preferred scheme'. Chapter 3.2 'Alternatives Considered' lists the various options considered and outlines the process involved in the screening and assessment of the different options. Options considered included pumping, modifications to weirs and bridges, individual property protection measures, river and tidal barriers, land use management, early warning system and planning controls. The potentially viable options were 'do nothing', 'do minimal' and 'structural measures'

The EHS is satisfied that the EIAR provides details of the necessity to undertake works to prevent flooding on King's Island. In order to guarantee the future viability of domestic, commercial and community facilities on King's Island, 'do nothing' and 'do minima!' were not considered to be realistic options. Carrying out the programme of works described in the King's Island Flood Relief Scheme EIAR over an eighteen month timeframe is considered to be the most feasible option.

## 5. Assessment of the Physical Environment

### • Population and Human Health

The EHS notes the methodology used, including the legislation, guidelines and data sources referred to in the preparation of the chapter on Population and Human Health. Chapter 6 provides a description of King's Island, stating that it is divided into two areas – Englishtown, the historic part of Limerick city and St. Mary's Park, which is a residential estate. St Mary's Park has been assigned a deprivation score of 10 by the HSE, which indicates the highest level of deprivation. It has also been identified in the Limerick Regeneration Framework Implementation Plan 2013 as 'a deprived area in need of regeneration'

According to the 2016 census, the population of King's Island showed a marginal decrease of 1.8% between 2011 and 2016, when there were 866 households comprising 2167 people in the area. When asked to describe their health in the 2016 census, an average of 4.6% of the King's Island population described their health as 'bad' or 'very bad'.

The EIAR has identified potential sensitive receptors that may be impacted by the construction work, including homes, schools and colleges, childcare facilities, health, social and community facilities, commercial, tourism and recreational facilities. Chapter 6.6.2 'Construction Phase' acknowledges that local residences and businesses will be affected by construction activity relating to 'traffic, noise, air emissions and visual impacts'

Positive impacts arising from increased employment and an increase in the use of local services during the construction phase have also been outlined in the EIAR. On completion, it is anticipated that the King's Island Flood Relief Scheme will have a positive impact on the local population as the area 'will be less vulnerable to flooding' and the provision of additional recreational amenities will be beneficial to the local population.

The proposed King's Island Flood Relief Scheme will contribute towards meeting the objectives of the Healthy Ireland Framework 2013-2025, including the 'Healthy Limerick' initiative. 'Theme 4 – Environment' of the 'Get Ireland Walking – Strategy and Action Plan 2017-2020' aims 'to connect walkers with suitable walking environments and advocate for improved pedestrian infrastructure and recreational walking routes'. The inclusion and upgrading of walkways and cycle paths as part of the proposed development will be a positive factor in meeting this aim and in providing opportunities for health gain.

The provision of trees, walkways, cycle paths and glass river viewing areas will provide an opportunity for health gain for those living and working in King's Island and will encourage visitors to avail of the recreational amenities in the area. **The Environmental Health Service recommends that, where possible, pedestrian areas should be accessible to wheelchairs, pushchairs and mobility vehicles in order that all ages and all levels of mobility can access the improved recreational amenities. Consideration should be given to the provision of seating at the glass viewing areas as research has shown that views of water has benefits for both physical and mental health** (9Depledge ECEHH, UK 2013)

The Environmental Health Service is satisfied that the mitigation measures outlined in Chapter 6.7, if implemented in full, are adequate to protect human health. Particular emphasis is placed on the

**importance of providing a detailed site- and project- specific Construction Environmental Management Plan (CEMP).**

- **Surface and Ground water**

Chapter 9 of the EIAR describes the River Shannon as having a total catchment area of 17,000km<sup>2</sup>. It divides into two water bodies – the Shannon and the Abbey River - to the north of King's Island. Both of these rivers are tidal. From the information provided in Figure 9.2 'Groundwater Bodies' the bedrock aquifers underlying the King's Island area are the Limerick City East Aquifer and the Limerick City North Aquifer, which have both been classified by the GSI as 'Locally important aquifer(s), bedrock which is generally moderately productive'. The aquifer vulnerability in the study area and surrounding area has been classified as 'extreme and high'. Both of these aquifers are used as sources of drinking water and feed into the Limerick City Public Water Supply. There are no private wells supplying drinking water on King's Island as all properties are connected to the Limerick City Public Water Supply.

The Lower Shannon Special Area of Conservation (SAC) includes part of King's Island.

Hydrogeological investigations undertaken in the preparation of the EIAR indicate that there may be some historic minor contamination of made ground in the SAC.

Details are provided in Chapter 9.3.6 of the surface water quality in the Limerick Docks Transitional Water Body, which is described as being 'at risk'. Monitoring of water quality in the River Shannon is undertaken at a number of points, the closest one to King's Island being at Castleconnell, a distance of approximately 13km away. Results from the most recent data for this station indicated that the water quality at this point was unsatisfactory.

Chapter 9.4.2 'Construction Phase' details the potential impacts on surface and groundwater quality and the manner in which water quality may be impacted during the construction phase of the King's Island Flood Relief Scheme. Chapter 9.5 describes the mitigation measures proposed to minimise these impacts.

It is noted that it is proposed that *'a water quality monitoring regime will be established and agreed with the NPWS and IFI in advance of works commencing'*. **The EHS recommends that the quality of drinking water from the Limerick City Public Water Supply serving Kings Island is monitored during the construction phase of the project. This monitoring programme should be agreed with Irish Water, Limerick City and County Council and the HSE Environmental Health Service who should also be notified of monitoring results.**

The Environmental Health Service is satisfied those potentially significant impacts on surface and groundwater quality arising during the construction phase of the proposed project have been identified and that the detailed mitigation measures proposed in Chapter 9.5, if implemented in full, are acceptable to protect public health.

- **Air Quality – Dust**

Chapter 12 'Air Quality, Dust and Climate Change' outlines the methodology used to determine the existing air quality in the King's Island area. It is noted that no baseline air quality was undertaken and data from on-going air quality monitoring undertaken by Limerick City and County Council was used to determine baseline air quality. Limerick City and County Council undertake monitoring of



particulate matter and gases (NO<sup>2</sup>, SO<sup>2</sup>, CO and ozone) at three city sites. Existing air quality in the King's Island area is classified as good.

As a result of dust deposition, the construction phase of the scheme has the potential to result in a decrease in air quality in the immediate vicinity of the construction and demolition works.

The EIAR determines the potential magnitude of dust emissions from earthworks as being 'medium to large', from construction activities as being 'low' and from trackout activities as being 'large'. It is noted in Chapter 12.6 'Sensitivity of Receptors' that 'there is an estimated 10-100 receptors within 20m of the proposed construction activities on Kings Island'. This takes into account residential properties, other occupied buildings and car parks. The 'sensitivity of the area to dust soiling effects on people and property' from the construction phase of the flood relief scheme is considered to be 'high'

Information on the HSE's 'Health Profile for Limerick City 2015' indicates that respiratory illness rates are significantly higher than the national average (Limerick C&C 9.6; Ireland 6.4). It is likely that some residents of the King's Island may be affected by chronic respiratory illness which could be exacerbated by dust emissions during the construction of the flood relief scheme. Therefore it is crucial that the stakeholder communication measures cited in Chapter 12.7 'Mitigation Measures' are adhered to

*'Develop and implement a stakeholder communications plan that includes community engagement before work commences on site'*

Healthcare facilities should be prioritised in any communication plan.

There are a number of food businesses, catering facilities and hotels in the vicinity of the proposed site. The Environmental Health Service recommends that specific mitigation measures are put in place to prevent the contamination of food being delivered, stored and prepared in food business premises in the proximity of works, and to minimise the spread of dust to food premises and the subsequent contamination of food. This should be by means of communication with the food business operators prior to the commencement of dust generating works.

It is recommended that the contractor liaises with the organisers of any festivals (St Patrick's Day Festival, Riverfest, for example) which are due to be held during the construction of the flood relief scheme in order to ensure that they are facilitated during the construction period.

The EHS recommends that the extensive dust mitigation measures detailed in Chapter 12.7.2 'Construction Phase' are stringently implemented in order to minimise potentially significant impacts on public health.

- **Air Quality – noise and vibration**

The impact of noise from the proposed King's Island Flood Relief Scheme has been considered in Chapter 11. Background noise monitoring was undertaken in the preparation of the EIAR in order to establish the existing noise environment. Noise surveys were undertaken at eight locations on King's Island on Tuesday 7 May 2019. The results of the baseline noise survey indicated that there were variations in noise levels depending on location within King's Island. In the vicinity of St Mary's Park, which is a residential area to the north, noise levels were dominated by local traffic, pedestrians, birdsong, the River Shannon and construction activities which were being undertaken at the time of monitoring. Noise levels were in the range of 50 to 62 dBA<sub>eq</sub>

To the south of King's Island where the noise environment is dominated by local and regional traffic noise levels recorded were in the range of 57 to 58 dBL<sub>Aeq</sub>

Chapter 11.4 'Predicted Impacts' details the predicted noise impacts during the various stages of the construction phase and at different locations throughout the proposed course of the flood reliefs. Most predicted noise levels do not exceed the noise limits which have been applied based on BS5228 criteria (BS 5228 Part 1 and Part 2 Code of Practice for Noise and Vibration Control on Construction and Open Sites (2009+A1:2004))

Mitigation measures specified in Chapter 11.5 proposes that construction noise is controlled by using best practice identified in BS5228 which includes noise control at source, liaison with the public and noise monitoring. **The nature of construction activities can lead to short term excessive noise exposure for the public and the Environmental Health Service recommends that permitted construction activity is limited to the hours**

<b>Monday to Friday</b>	<b>08:00 – 20:00</b>
<b>Saturday</b>	<b>08:00 – 14:00</b>
<b>Sundays and Bank Holidays</b>	<b>No noisy work on site</b>

The public should be notified of the expected working hours and any works outside these hours should be exceptional and with the prior consent of the planning authority.

The EIA states that 'potential sources of transient vibration during the construction phase of the proposed scheme may arise from the breaking of existing road surfaces during road works' In order to mitigate vibration impacts, the contractor 'will be required to select and utilise methods of working and items of plant so that the maximum measured ground vibrations do not exceed a peak particle velocity (PPV) of 12mm/s for structurally sound and non-protected buildings and 6mm/s for protected and /or potentially vulnerable buildings'

The Environmental Health Service is satisfied that the detailed noise mitigation measures described in Chapter 11.5.1 'Construction Phase' if implemented in full are adequate to protect human health.

- **Pest Control**

The Environmental Health Service was unable to locate any reference to pest control measures to be implemented by the contractor during the construction phase of the scheme. The control of pests on site is essential both for the safety of construction workers and to protect nearby homes and food businesses. Pests, such as rats, are found close to rivers and it is likely that rats will be encountered during the demolition phase of the project, as well as during work undertaken within the river (construction of flood protection walls)

Activities that can cause open wounds or that take place near the water's edge where rat urine is more likely to be found increases the risk of contracting Weil's Disease, which is a bacterial infection carried by rats. It can be contracted by humans through contaminated fresh water (RoSPA, 2008) It is recommended that a Pest Control Plan is incorporated into the final Construction Environmental Management Plan.

Recommended Pest Control Measures include:

1. A site survey by a professional Pest Control company should be undertaken at least four weeks prior to works commencing to identify evidence of pest infestations. Where infestations are

identified, appropriate treatments must be implemented to eliminate infestations prior to works commencing.

2. Care should be taken by the contractor not to damage drains or sewers when using machinery, as this can provide an access route for rats onto the site.
3. Old redundant sewers and drains should be capped and removed where possible and 'live' sewer connections should be appropriately sealed and capped while construction works are in progress to prevent rat egress from the sewers.
4. Pest monitoring and surface baiting should be undertaken on site during demolition/construction works.
5. Contractors should ensure that the construction site is kept as clean and tidy as possible, and any food debris should be stored in a pest proof container within the welfare facility.
6. Construction workers should be made aware of the risks associated with rodents, especially rats, and should wear suitable PPE. They should also adopt good hygiene practices, such as covering open skin wounds and washing their hands on removing safety gloves and prior to eating.

- **Assessment of Interaction of the above impacts**

The Environmental Health Service notes that the EIA assessed cumulative impacts of the proposed flood relief scheme in respect of existing and proposed developments in the Limerick city area. Chapter 16 of the EIAR describes the potential impacts of the King's Island Flood Relief Scheme on these existing and proposed developments. The assessment concludes that no likely significant cumulative impacts are expected on the eleven developments assessed.

### **Conclusion**

The Environmental Health Service makes the following recommendations in respect of this planning application

- A dedicated member of the construction team has specific responsibility for dealing with any potential complaints and queries which may arise during the construction phase of the project, and that the local community are informed of the timing, nature and extent of the proposed works via regular updates on local radio, newspapers, the project website and appropriate social media channels.
- 24 hours' notice is given in advance of critical phases of the work which may have significant impacts on sensitive receptors.
- Pedestrian areas should be accessible to wheelchairs, pushchairs and mobility vehicles in order that all ages and all levels of mobility can access the improved recreational amenities. Consideration should be given to the provision of seating at the glass viewing areas as research has shown that views of water has benefits for both physical and mental health (Depledge ECEHH, UK 2013)
- The quality of drinking water from the Limerick City Public Water Supply serving Kings Island is monitored during the construction phase of the project. This monitoring programme


should be agreed with Irish Water, Limerick City and County Council and the HSE Environmental Health Service who should also be notified of monitoring results.

- Specific mitigation measures are put in place to prevent the contamination of food being delivered, stored and prepared in food business premises in the proximity of works, and to minimise the spread of dust to food premises and the subsequent contamination of food. This should be by means of communication with the food business operators prior to the commencement of dust generating works
- The contractor liaises with the organisers of any festivals (St Patrick's Day Festival, Riverfest, for example) which are due to be held during the construction of the flood relief scheme in order to ensure that they are facilitated during the construction period.
- The dust mitigation measures detailed in Chapter 12.7.2 'Construction Phase' are stringently implemented in order to minimise potentially significant impacts on public health.
- Permitted construction activity is limited to 8 am to 8pm Monday to Friday and 8am to 2pm on Saturdays. No noisy work should be undertaken on Sundays or Bank Holidays
- A Pest Control Plan should be incorporated into the final Construction Environmental Management Plan.

Signed:

*P.P.*   
John Ryan  
Senior Environmental Health Officer  
HSE West, Ashbourne Business Park, Dock Road, Limerick

Signed:

  
Environmental Health Officer  
Environment OU, Ennistymon Health Centre, Ennistymon, Co. Clare

## Rob Mac Giollarnáth

---

**From:** Fitzgerald, Patricia B <patriciab.fitzgerald@hse.ie>  
**Sent:** Monday 10 February 2020 09:59  
**To:** Curtin, Andrew  
**Subject:** FW: EIAR King's Island Flood Relief Scheme  
**Attachments:** EIAR Kings Island Flood Relief Scheme 30 12 19.pdf

Sent on behalf of Dr Mai Mannix,

Good Morning Andrew,

Apologies for the delay with regard to the above query- **EHIS Reference Number 1075**

Please see response from the Department,

Patricia B Fitzgerald  
Clerical Officer - HSE Mid-West (Limerick, Clare and North Tipperary) | Strategic Planning and Transformation |  
Department of Public Health | Mount Kennett House | Henry St. | Limerick | V94 KN3N

Tel: 061-483338 Fax: 061-464205 Email: [patriciab.fitzgerald@hse.ie](mailto:patriciab.fitzgerald@hse.ie)

Patricia B Fitzgerald  
Oifigeach Cléireachais - FSS An Mheán Iarthair (Luimneach, Clarke agus Tiobraid Árann Thuaidh) | Pleanáil  
Straitéiseach agus Claochlú | An Rannóg Sláinte Poiblí | Teach Mhoin Cinit | Sráid Anraí | Luimneach | V94 KN3N

Teil: 061-483338 Facs: 061-464205 Rphost: [patriciab.fitzgerald@hse.ie](mailto:patriciab.fitzgerald@hse.ie)



Seirbhís Sláinte | Building a  
Níos Fearr | Better Health  
á Forbairt | Service

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**From:** Cosgrove, Breda  
**Sent:** 07 February 2020 12:47  
**To:** Mannix, Mai  
**Cc:** Fitzgerald, Patricia B; Cleary, Aisling  
**Subject:** FW: EIAR King's Island Flood Relief Scheme

I have reviewed the LCCC application submitted to An Bord Pleanála for approval of the flood defence scheme at King's Island (King's Island Flood Relief Scheme) – details of which are available at <http://www.kingsislandfrs.ie/downloads/>

My comments are as follows:

As the Public Health Department has not been made aware of any health concerns in relation to this proposal, there would be nothing to add to the submission being made by Environmental Health at this time.

Many thanks, and I'm more than happy to discuss at any time.

Kind regards,

Breda

Dr Breda Cosgrove MPH MRCPI MFPHMI  
Specialist in Public Health Medicine - HSE Mid-West (Limerick, Clare and North Tipperary) | Strategic Planning and Transformation | Department of Public Health | Mount Kennett House | Henry St. | Limerick | V94 KN3N

Tel: 061-483338 Fax: 061-464205 Email: [breda.cosgrove1@hse.ie](mailto:breda.cosgrove1@hse.ie)

Dr Bríd Ní Cosraigh MPH MRCPI MFPHMI  
Speisialtóir sa Mhíochaine Sláinte Poiblí - FSS An Mheán Iarthair (Luimneach, Clár agus Tiobraid Árann Thuaidh) | Pleanáil Straitéiseach agus Claochlú | An Rannóg Sláinte Poiblí | Teach Mhoin Cinit | Sráid Anraí | Luimneach | V94 KN3N

Teil: 061-483338 Facs: 061-464205 Rphost: [breda.cosgrove1@hse.ie](mailto:breda.cosgrove1@hse.ie)



Seirbhís Sláinte  
Níos Fearr  
á Forbairt

Building a  
Better Health  
Service

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**From:** Mulcahy, Helen **On Behalf Of** Kelleher, Kevin  
**Sent:** 30 December 2019 14:01  
**To:** Mannix, Mai; Director of Public Health  
**Cc:** Kelleher, Kevin  
**Subject:** FW: EIAR King's Island Flood Relief Scheme

Kind Regards, *Helen* Helen Mulcahy, Assistant Staff Officer, National Office for Public Health/Child Health, Strategic Planning and Transformation, HSE Public Health Offices, Second Floor, Mount Kennett House, Henry Street, Limerick Tele. 061 483347. Email [helent.mulcahy@hse.ie](mailto:helent.mulcahy@hse.ie)

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**From:** Fiona McCormack [<mailto:fiona.mccormack5@hse.ie>] **On Behalf Of** Environmental Health  
**Sent:** 30 December 2019 13:02  
**To:** Emergency Managementwest; Helen Maher (Estates Manager); Kelleher, Kevin; 'laura1.murphy@hse.ie'; CHO, Midwest

**Cc:** Sulley, Andrew; Curtin, Andrew  
**Subject:** EIAR King's Island Flood Relief Scheme

To:

- Emergency Planning – Kay Kennington
- Estates – Helen Maher
- Assistant National Director for Health Protection – Kevin Kelleher / Laura Murphy
- CHO – Maria Bridgeman

The HSE has received an Environmental Impact Assessment Report for consideration. The EHIS Reference Number is 1075.

Please email Andrew Curtin, PEHO, Limerick ([andrew.curtin@hse.ie](mailto:andrew.curtin@hse.ie)) if you wish to make a submission.

Submissions must reach the local PEHO office no later than 7<sup>th</sup> February 2020.

Kind Regards,  
Fiona

**Fiona McCormack**  
**National Business Services Unit**  
**National Environmental Health**  
Oak House, Limetree Avenue, Millennium Park, Naas, Co. Kildare  
Tel: +353 (0) 45 880442



Seirbhís Sláinte  
Níós Fearr  
á Forbairt

Building a  
Better Health  
Service



Comhairle Cathrach  
& Contae Luimnigh

Limerick City  
& County Council

Seirbhísí Dearaidh agus Soláthair,  
Comhairle Cathrach agus Contae Luimnigh,  
Ceanncheathrú Chorparáideach,  
Cé na gCeannaithe,  
Luimneach

Design and Delivery Services,  
Limerick City and County Council,  
Corporate Headquarters,  
Merchants Quay,  
Limerick

Mr Dave Molloy  
Assistant National Director  
Environmental Health and Emergency Planning  
Health Service Executive  
Oak House, Lime Tree Avenue  
Millennium Park  
Naas  
Co Kildare



EIRCODE V94 EH90

t: +353 (0) 61 557 180

#### Planning Referral

Section 226 of the Planning and Development Act 2000, as amended and the Planning and Development Regulations 2001, as amended  
Limerick City & County Council proposes to seek approval from An Bord Pleanála for the following proposed development:

#### King's Island Flood Relief Scheme

19<sup>th</sup> December 2019

Dear Mr Molloy,

An **Environmental Impact Assessment Report (EIAR)** and a **Natura Impact Statement (NIS)** have been prepared in respect of the proposed development. The application plans and particulars, the EIAR and NIS are attached in hardcopy.

**Submissions or observations** may be made in writing only to An Bord Pleanála ('the Board') 64 Marlborough Street, Dublin 1, D01 V902 in respect of:

- (i) The implications of the proposed development for proper planning and sustainable development in the area concerned, and
- (ii) The likely effects on the environment of the proposed development, if carried out, and
- (iii) The likely significant effects of the proposed development on a European site, if carried out.

Any submissions / observations must be received by the Board not later than 5.30 p.m. on **14<sup>th</sup> February 2020**. Such submissions or observations must include the following information:

1. The name of the person, authority or body making the submission or observation, the name of the person, if any, acting on behalf of that person, authority or body, and the address to which any correspondence relating to the application should be sent,
2. The subject matter of the submission or observation, and
3. The reasons, considerations and arguments on which the submission or observation is based in full.

Yours Sincerely,

Kieran O'Gorman - Senior Executive Engineer  
Design & Delivery Services