Limerick City and County Council.



Limerick Way Finding and Signage Project

Environmental Impact Assessment Screening

August 2023.

Project Summary: This is a Screening for Environmental Impact Assessment (EIA) of a proposed development within the metropolitan area of Limerick. It should be read with the Appropriate Assessment Screening document which is also part of the project documentation. The proposed development consists of the removal of 45 existing pedestrian wayfinding and information signs and the installation of 70 new pedestrian wayfinding and orientation signs comprising 18 Map Totems, 19 Route Markers and 33 Finger Posts and all associated site works as part of a wayfinding scheme. The project is designed to rationalise and update the existing signage stock and to present clear information and directions to both residents and visitors. Three types of signs are proposed, consisting of free standing 'totem' signs, route marker signs and fingerpost signs. These are proposed for installation in Limerick's city centre, and also along the Shannon banks.

This screening report has assessed the potential environmental impact of the proposed development on the environment in the Limerick Metropolitan Area. The proposed development does not fall under the types of development listed in Part 1 or Part 2 of Schedule 5 to the Planning and Development Regulations 2001, (as amended) for mandatory EIAR. There is also the issue of what is termed sub threshold EIA (OPR 2021, p.6, DHPLG, p.11) where projects that fall under the statutory thresholds might also have effects on the Environment. The EIA Screening Assessment has determined that there is no requirement for the preparation of an EIAR, sub threshold or otherwise. This is for the following reasons:

- 1 Only nine signs are within a Natura 2000 site boundary and these are within heavily modified areas such as streetscapes and footpaths. In all cases the works are limited in scale. The limited scale of works and its area specific nature means that effects would be confined to the immediate vicinity of the signage and not impinge on the SAC or SPA Sites. It should also be noted that in assessing an AA screening that "standard measures" in terms of pollution or emission control can be taken into account even when these have the effects of reducing effects on the Natura 2000 sites in question (C721-21). This would apply in this case to the Construction and Environmental Management Plan (CEMP) for these works. This CEMP is part of the works documentation.
- **2** The signage does not have lighting or moving parts which would add to disturbance effects. This is particularly relevant for those signs which are closest to or within the Special Protection Area and Special Area of Conservation. The signage is, in many cases, an addition to the existing stock of signage and street furniture.
- **3** The scale of works associated with the erection of the signage is limited and unlikely to create effects immediately beyond the locations of the individual signs. The limited degree of excavation required and limited amount of cement based products required renders the effects of signage erection limited and confined to the immediate area of the sign.

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1.0 Introduction: to help inform the screening the following documents were consulted and follow up meetings took place with staff of Limerick City and County Council to clarify aspects of the project.

Part 8 Archaeological Report.

Part 8 Design, Planning & Architectural Heritage Report

Outline Construction and Environmental Management Plan (CEMP).

Scheme Drawings.

Proposed Signage Schedule

This was supplemented by site visits in the area of the proposed way finding and signage project indicated in Figure 4 below. These document should be read with the Environmental Impact Assessment screening document, in particular the CEMP.

Description of works: The proposed development consists of the removal of 45 existing pedestrian wayfinding and information signs and the installation of 70 new pedestrian wayfinding and orientation signs comprising 18 Map Totems, 19 Route Markers and 33 Finger Posts and all associated site works. From this it will be noted that there are 25 new signs to be erected. Three types of signs are in question, these being monolith, finger post and small marker. These are shown in the following illustrations. The illustrations give an indication of what they look like but also how they might integrate into Limerick's urban environment. It might not be possible to locate them in the exact locations indicated in the drawings which accompany the application. The red shading in the pictures indicates the extent of the alternative nearby locations which might be used. These are immediately adjacent to the original location chosen.



Figure 1: Monolith, map marker sign. Proposed location is close to Thomond Bridge.



Figure 2: finger post sign in proposed location on intersection between Castle Street and Island Road.



Figure 3: Low marker sign located in proposed location on Nicholas Street.

The proposed signage will often be located on existing structures such as poles or close to walls which would further reduce the visual effects. There have been many attempts over the years to rationalise signage in the metropolitan area and to reduce visual clutter and reduce the amount of unnecessary and often outdated signage. The Limerick Way Finding and Signage project is the latest and most comprehensive of these initiatives.

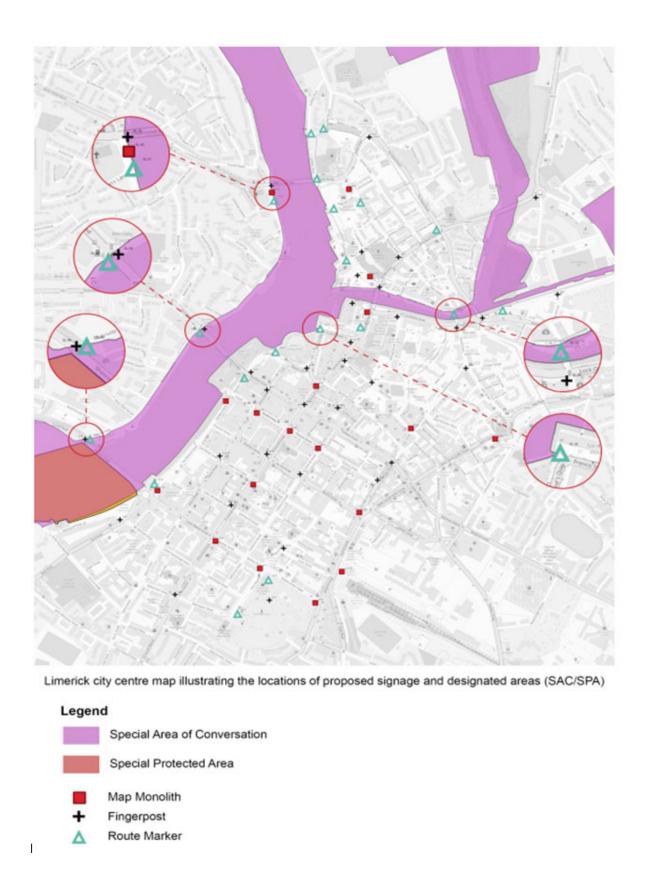


Figure 4: location of the proposed wayfinding and signage scheme.

1.1 Legislation and Planning Guidance: The EIA Directive, Council Directive 85/337/EEC 1985 on the 'Assessment of the effects of certain public and private projects on the environment' ensures that projects likely to have a significant effect on the environment are subject to an assessment of environmental effects prior to consent being given. This Directive has been amended by Directive 2014/52/EU of 2014. This is transposed into Irish law by the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018) and the European Union (Planning and Development) (Environmental Impact Assessment) (No. 2) Regulations 2018.

Also in 2018 the *Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment* August 2018 was published by the Department of Housing, Local Government and Heritage.

1.2 Screening Process: Screening "is the initial stage in the EIA process and determines whether or not specified public or private developments are likely to have significant effects on the environment and, as such, require EIA to be carried out prior to a decision on a development consent application being made" (DHPLG, 2018, p.14. This is the stage we are at now.

The first task is to establish if the project is a class set out in Schedule 5 (Part 1 and 2) of the Planning and Development Regulations 2001, as amended, and is therefore subject to mandatory EIA. The second stage considers significant effects of the project on the environment and the possible need for a sub-threshold development.

Mandatory EIA Thresholds: The Limerick wayfinding and signage scheme fulfils the definition of a project in Article 1(2) of the EIA Directive. The project was compared to the description of urban development in Schedule 5 of the Planning & Development Regulations 2001-2023 (as amended) and the contents of the *Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment August 2018.* This was to determine if the wayfinding scheme proposed for Limerick city meets the development thresholds that require mandatory EIA, or if the development is sub-threshold to these criteria.

Schedule 5 (10) of the Planning and Development Regulations presents urban development under the following categories and thresholds

- (i) Construction of more than 500 dwelling units.
- (ii) Construction of a carpark providing more than 400 spaces, other than a carpark provided as part of, and incidental to the primary purpose of, a development.
- (iii) Construction of a shopping centre with a gross floor space exceeding 10,000 square metres.
- (iv) Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere. (In this paragraph, "business district" means a district within a city or town in which the predominant land use is retail or commercial use.)

The signage and wayfinding project did not fall under any of the categories or thresholds in this schedule, which means mandatory EIA is not required.

Subthreshold EIA: While not falling under any of the categories or thresholds of development as outlined above there is still the possibility that the signage project might yet generate significant effects on the environment. The 2018 EIA guidance (p.17) mentions "having regard to the 'Source – Pathway – Target' model, where appropriate". This was taken into account as was the contents of the Construction and Environmental Management Plan, which was one of the documents provided. This can be included in the assessment as it is part of the works programme. The criteria for Schedule 7 of the Planning and Development Regulations provided a template for this assessment. The Criteria and commentary which outlines possible environment effects are presented below:

2.0 Assessment of the proposed development.

1. Characteristics of proposed development

The characteristics of proposed development, in particular—

- (a) the size and design of the whole of the proposed development,
- (b) cumulation with other existing development and/or development the subject of a consent for proposed development for the purposes of section 172(1A)(b) of the Act and/or development the subject of any development consent for the purposes of the Environmental Impact Assessment Directive by or under any other enactment,
- (c) the nature of any associated demolition works,
- (d) the use of natural resources, in particular land, soil, water and biodiversity,
- (e) the production of waste,
- (f) pollution and nuisances,
- (g) the risk of major accidents, and/or disasters which are relevant to the project concerned, including those caused by climate change, in accordance with scientific knowledge, and
- (h) the risks to human health (for example, due to water contamination or air pollution).

Comments: The proposed development consists of the removal of 45 existing pedestrian wayfinding & information signs and the installation of 70 new pedestrian wayfinding and orientation signs comprising 18 Map Totems, 19 Route Markers and 33 Finger Posts and all associated site works. From this it will be noted that there are 25 new signs to be erected. The scale of the individual signage and its appearance can be gauged from Figures 1 to 3. In terms of the actual footprint of each sign, an allowance of 5m2 is assumed. This also takes into account possible movement. On

average this is far in excess of what some signage would require (see Figures 1 to 3). Assuming 70 signs (70 x 5) this is 350m2. This is 0.035ha. This is below the 2ha area mentioned in Schedule 5(10)(iv) of the Planning Regulations. It has been decided to use the 2ha as a baseline, as this refers to "business district" which is a close approximation of the City Centre zoning in which much of the Signage is proposed (Limerick Development Plan 2022-2028, p.343 and Map 3 Volume 2a, p.22).

In terms of cumulative effect, firstly any effects must be considered in the context of similar development such as signage and street furniture. It should also be considered in the context of transport trends and developments associated with that. In recent years there has been a consistent effort on the part of LCCC to make the city centre more pedestrian friendly. This is reflected in initiatives such those on O Connell Street, and Bedford Row and elsewhere. Clearly legible signage is an essential part of pedestrianisation and the new wayfinding scheme will be an important addition to this.

The proposed signage will often be located in the position of existing signs which would further reduce the visual effects. There have been many attempts over the years to rationalise signage in the metropolitan area and to reduce visual clutter and the amount of unnecessary and often outdated signage and the way finding project is part of this on-going effort.

In terms of pollution risks, demolition works and natural resources, the effects are judged to be very limited in scale. This is because there will be no large structures demolished or modified, just those associated with signage. Where new foundations may have to laid, good practice measures designed to prevent pollution and ensure good work practices should reduce the risk of pollution to a level which is not significant. Such measures would include shuttering, where necessary and working only in suitable weather conditions. These measures are presented in the Construction and Environmental Management Plan (CEMP) which is part of the project documentation. In the CEMP the risks associated with each signage location are outlined and a reference to the relevant good practice measures from the CEMP which will be employed are described. The local ecology of each site is also described using the habitat code developed by Fossitt (2000), which is a useful shorthand for describing the ecological conditions on site. This will influence the measures needed to reduce environmental effects. In this way site specific measures to for each signage location are put forward to ensure any changes of pollution or significant environmental damage are removed. For instance signage locations SL1 And SL3 identify risk to water quality. This is followed by a reference to appropriate locations (sections 3.1 and 3.2) in the CEMP where the good practice measures to prevent this risk is mentioned. There is a direct link between the signage locations and the necessary measures to be employed to reduce environmental risk.

Usage of natural resources will be confined to material sourced from locations such as quarries which possess either planning permission or have been registered. This will help ensure that such sources operate under conditions governed by standards laid down by appropriate planning or environmental guidelines. As can be seen from the Figures 1-3 and Figure 4, the project is located in a highly modified urban

environment, so its potential for soil and bio-diversity disturbance is limited. This is dealt with in more detail below.

From the point of view of nuisance and disturbance the only possibility of this is during the construction phase. This is likely to be masked by long established traffic either by pedestrians or vehicles. It will only occur for a limited time and during daylight hours typically 8.00AM to 5.30PM. During the operational phase the signage is not likely to cause disturbance. It will not have lighting or moving parts.

2. Location of proposed development

The environmental sensitivity of geographical areas likely to be affected by the proposed development, with particular regard to—

- (a) the existing and approved land use,
- (b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground,
- (c) the absorption capacity of the natural environment, paying particular attention to the following areas:
- (i) wetlands, riparian areas, river mouths;
- (ii) coastal zones and the marine environment;
- (iii) mountain and forest areas;
- (iv) nature reserves and parks;
- (v) areas classified or protected under legislation, including Natura 2000 areas designated pursuant to the Habitats Directive and the Birds Directive and;
- (vi) areas in which there has already been a failure to meet the environmental quality standards laid down in legislation of the European Union and relevant to the project, or in which it is considered that there is such a failure;
- (vii) densely populated areas;
- (viii) landscapes and sites of historical, cultural or archaeological significance

Comment: the proposed development is located within the metropolitan area of Limerick city which is within the zoned area of the Limerick Development Plan. The predominant zoning category assigned to the area where the proposed development is to take place is City Centre zoning (see below). The signage is to be located within heavily modified streetscapes so its effects on any natural areas is limited. This is indicated in Figure 6 below. The signs are located within heavily modified habitats such as Buildings and Artificial surfaces (BL3) or artificial grassland (GA2).

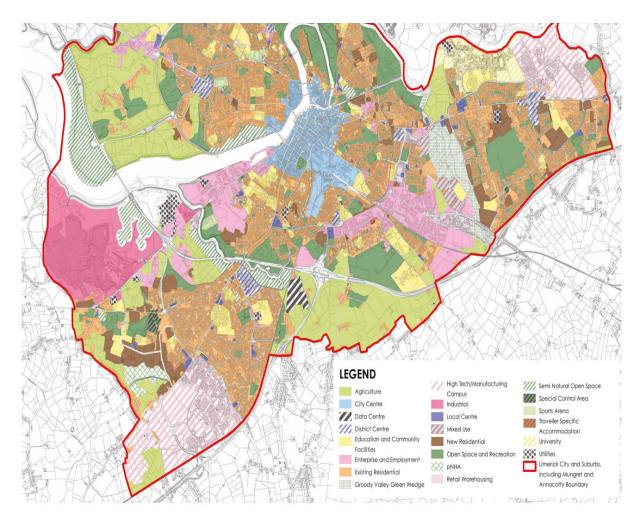


Figure 5: the light blue colours in the centre of the zoning map show city centre zoning.

The Boundaries of the development are shown in Figure 4. The actual footprint of the development is a different matter and varies from sign to sign.



Figure 6: This is one of the signs to be replaced, on the board walk on the southern bank. This indicates the highly modified nature of the streetscape into which any new signage will be introduced.

In terms of absorbing the projects, the highly developed nature of the city centre areas, together with a large pre-existing stock of signage should mean that it will be easily absorbed. The signage is located close to the River Shannon and its two Natura 2000 designations, the Lower River Shannon SAC site and the River Shannon and Fergus Estuaries SPA. The qualifying interests (i.e. the habitats and species for which they designated are presented below.

Table 1: Qualifying interests of the River Shannon and Fergus Estuaries SPA.

Cormorant (Phalacrocorax carbo) [A017]		
Whooper Swan (Cygnus cygnus) [A038]		
Light-bellied Brent Goose (Branta bernicla hrota) [A046]		
Shelduck (Tadorna tadorna) [A048]		
Wigeon (Anas penelope) [A050]		
Teal (Anas crecca) [A052]		
Pintail (Anas acuta) [A054]		
Shoveler (Anas clypeata) [A056]		
Scaup (Aythya marila) [A062]		
Ringed Plover (Charadrius hiaticula) [A137]		
Golden Plover (Pluvialis apricaria) [A140]		
Grey Plover (Pluvialis squatarola) [A141]		
Lapwing (Vanellus vanellus) [A142]		
Knot (Calidris canutus) [A143]		
Dunlin (Calidris alpina) [A149]		
Black-tailed Godwit (Limosa limosa) [A156]		
Bar-tailed Godwit (Limosa Iapponica) [A157]		
Curlew (Numenius arquata) [A160]		
Redshank (Tringa totanus) [A162]		
Greenshank (Tringa nebularia) [A164]		
Black-headed Gull (Chroicocephalus ridibundus) [A179]		
Wetland and Waterbirds [A999]		

Source: https://www.npws.ie/protected-sites/spa/004077

Table 3: Qualifying interests of the Lower River Shannon SAC site.

Sandbanks which are slightly covered by sea water all the time [1110]

Estuaries [1130]

Mudflats and sandflats not covered by seawater at low tide [1140]

Coastal lagoons [1150]

Large shallow inlets and bays [1160]

Reefs [1170]

Perennial vegetation of stony banks [1220]

Vegetated sea cliffs of the Atlantic and Baltic coasts [1230]

Salicornia and other annuals colonising mud and sand [1310]

Atlantic salt meadows (Glauco-Puccinellietalia maritimae) [1330]

Mediterranean salt meadows (Juncetalia maritimi) [1410]

Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation [3260]

Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae) [6410]

Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) [91E0]

Margaritifera margaritifera (Freshwater Pearl Mussel) [1029]

Petromyzon marinus (Sea Lamprey) [1095]

Lampetra planeri (Brook Lamprey) [1096]

Lampetra fluviatilis (River Lamprey) [1099]

Salmo salar (Salmon) [1106]

Tursiops truncatus (Common Bottlenose Dolphin) [1349]

Source: NPWS

Nine signs are located within the boundaries of the Lower River Shannon SAC site. It is during the construction phase of the proposed development that disturbance or effects on the natural environment is most likely or other effects such as pollutants entering the river. Reference has been made above to the specific measures to be employed in the Construction and Environmental Management Plan to avoid pollution. Disturbance through movement and noise from the works is also an issue that will

have to be considered, particularly for bird species, for which the SPA is designated. The background level of normal traffic both vehicles and pedestrian is a factor that is ever present in the city centre and it is likely that the movement during the construction phase, being confined to specific sites and lasting only during daylight hours when human activity is at its highest will be absorbed by the ambient activity of the city centre area. Many of the signs are replacements for existing ones so their construction will not lead to new risk of disturbance or collision risk for bird species. The habitats that are affected are highly modified urban habitats and are not of the same ecological value, nor are they ecologically similar to the Qualifying Interests of either Natura 2000 site.

Table 3: On site habitats and relationship to Qualifying Interests of downstream SAC site.

Habitat	Fossit Code	Relationship to Qualifying interest habitats	Comments
Buildings and Artificial surfaces. BL3 and Amenity Grassland (GA2).	BL3 GA2.	None	Of limited ecological interest, all are of human construction or modification. No link with qualifying Interest Habitats. They are either built construction such as footpaths or boardwalks or amenity grass areas in urban open space.

Sections 1.6.2, 3.1 and Appendix A of the CEMP deal with issues during the construction phase. The other issue that arises is the possible transmission of invasive species. Introduction of these to the river would enable their further spread downstream. It is considered that terrestrial invasive species such as plants like Himalayan Balsam or Japanese Knotweed or Old Man's Beard would be the greatest risk. This is dependent on where the machinery might have been previously and this raises the issue of water borne species or diseases which might also be factor. This is dealt with in the CEMP, where a section on biosecurity and cleaning of vehicles outlines measures to be taken. Disturbance of on-site invasive species is also a factor to be taken into account Species such as Buddleia and Japanese Knotweed, for instance, are widely present in already modified environments within the boundary area of the way finding and signage project. Walkovers in July and August have shown

that no invasive species are present in the area of the proposed signage, so disturbance of onsite species which might lead to further spread is unlikely. It is likely that there will be a gap between lodging of the Part 8 and the eventual erection of the signage, so it is recommended that a walkover of all works areas be carried out prior to construction to ensure that invasive species have not spread to those sites in the interim. This is considered a necessary step to ensure no further spread of these species, as at least part of growing season would have elapsed before possible construction works.

The possible disturbance of onsite habitats such as crevices for roosting bats or birds is another factor to take into account. Walkovers in August indicated that where crevices were present none were used by bats or birds. They were either too shallow or located too close to the ground to be of optimum use for these purposes. Nearby trees did not have the structural features such as crevices or cracks that bats might use. One of the replacement finger point signs is to be located within 400m of a known Lesser Horseshoe Bat roost. This sign is to be erected at the Western end of the Park Canal. However since this is a one for one replacement and does not have any lighting or moving parts it is not considered that it will any effects on the roost. Its distance from the roost also ensures that there will not be an effect.



Figure 7: amenity grassland in the Peoples Park, where one of the signs is to be located. No suitable fissures or locations for bats were found when assessed in August 2023. The receiving environment for the new sign is amenity grassland.



Figure 8: though located on Nicholas Street, the dimensions and depths of the cracks in this stone work, close to where a sign is to be erected is typical of those found in such structures throughout the area. No traces of bats or birds were found in any.

A Swift Survey had been carried out In Limerick in 2022 to help to inform planning led conservation initiatives. Any of the sites that were identified in structures and locations in that survey were different from those conditions and locations that are part of the way finding and signage project. In short, the locations for the signage would be entirely unsuitable as nesting sites for swifts.

The construction activity in terms of movement and noise has to be seen in the context of the urban environment in which it is located with its long established history of human activity. Ongoing traffic either vehicles and pedestrians is likely to mask such activities. The contents of the CEMP, as outlined above, will prevent contaminants reaching the river which would reduce any chances of pollution to a level that would not be significant. This is important in safeguarding the habitats which are part of the Qualifying Interests of the Lower River Shannon Special Area of Conservation designated under the Habitats Directive and the River Shannon and Fergus Estuaries SPA which is designated under the Birds Directive.

Another highly mobile species that is part of the Qualifying Interests of the SPA is the Otter (*Lutra lutra*). It is not considered that the works will have any effect on this species. The city centre area is already highly modified. Previous construction such as that of a rescue boat pontoon just downstream of the Shannon Bridge in 2020 resulted in otters using the pontoon as a resting area and place to consume prey (personal communication from the Fire Service, February 2023). This indicates a high tolerance of new structures, even those placed within the river channel. This was within the SAC and SPA site. The current signage scheme will result in sign replacement on the river banks and not largescale construction work so it would be unlikely to affect otters. As the otter is a largely crepuscular species, the day time construction works are unlikely to disturb it.

The signs will be located in areas of historical and archaeological significance in Limerick City. Some will also be located closest to the Georgian areas of the city and within Architectural Conservation Areas. Successive submissions to the Development Plan by the National Monuments Service of the Department of Housing, Local Government & Heritage indicates the importance of riverine archaeology.

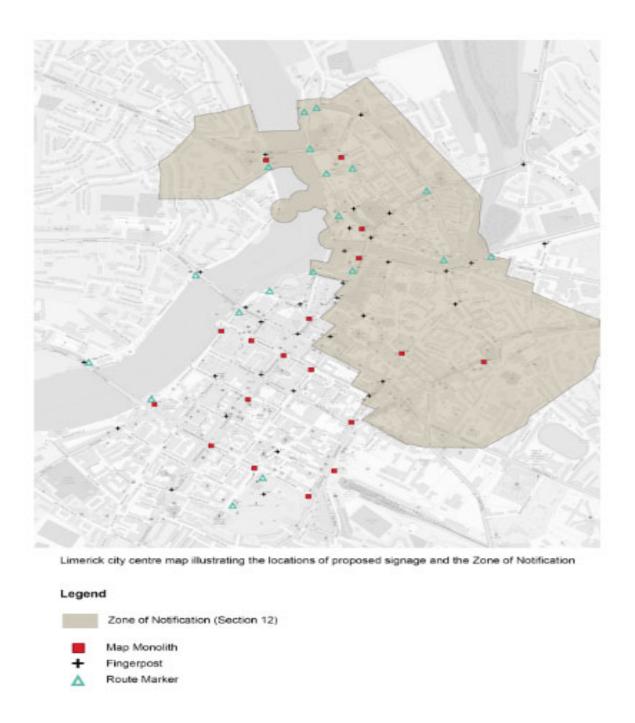


Figure 9: Showing zone of archaeological notification, within which are located some of the sites for the way finding and signage project.

The signage scheme was referred to the Local Authority Archaeologist. In the archaeologist's report, it is noted that locations for the works had been established and that in many cases it was replacement of existing signs that is proposed. Her recommendation was as following: "the mitigation shall consist of licensed archaeological monitoring. The archaeologist shall be appointed for the duration of the construction contract, a method statement shall be prepared for the licence application and the licence shall be in place before the construction commences. The archaeologist shall monitor all ground disturbance associated with the development.

Taking into account the nature of the recommendations from the Local Authority Archaeologist and the highly modified nature of the urban environment it is considered that the effects of the work would not be significant from an archaeological perspective.

Overall conclusions: owing to the limited sale of the works, much of it being replacement of existing signs and the heavily modified urban environment it is not considered that there would be any significant environmental effects from the works. Given the variety of outdated signage which is present in the urban area, the opportunity to reduce the amount of visual clutter will have a positive visual effect on the urban environment.

3. Types and characteristics of potential impacts

The likely significant effects on the environment of proposed development in relation to criteria set out under paragraphs 1 and 2, with regard to the impact of the project on the factors specified in paragraph (b)(i)(I) to (V) of the definition of 'environmental impact assessment report' in section 171A of the Act, taking into account—

- (a) the magnitude and spatial extent of the impact (for example, geographical area and size of the population likely to be affected),
- (b) the nature of the impact,
- (c) the transboundary nature of the impact,
- (d) the intensity and complexity of the impact,
- (e) the probability of the impact,
- (f) the expected onset, duration, frequency and reversibility of the impact,
- (g) the cumulation of the impact with the impact of other existing and/or development the subject of a consent for proposed development for the purposes of section 172(1A)(b) of the Act and/or development the subject of any development consent for the purposes of the Environmental Impact Assessment Directive by or under any other enactment, and
- (h) the possibility of effectively reducing the impact.

Comments: In terms of the actual footprint of each sign, an allowance of 5m2 is assumed. This also takes into account possible movement. On average this is far in excess of what some signage would require (see Figures 1 to 3). Assuming 70 signs (70 x 5) this is 350m2. This is 0.035ha. The overall area of the project, i.e. the area which the signage is designed to serve is shown in Figure 4 and is essentially Limericks historic core.

The nature of the impact is expected to be minor. The way finding and signage project is essentially a revision the existing stock which will result, in many cases, in a one for one replacement of signage. It will help reduce the amount of visual clutter in the area by standardising on three different sign types which should help visitors navigate their way to land marks in the area. The effects of the proposed scheme are local with no transboundary effects anticipated. The project could be summed up as the latest in a revision of Limerick street signage with limited and local effects, due to the small scale of works and the limited area involved. While there will be a definite impact, i.e. the replacement of existing signage with new and more legible signage stock, many of the effects are expected to be beneficial, reducing visual clutter and tidying this aspect of the public realm. The construction phase of the project is anticipated to take to two months and to occur in early 2024. The lifespan of the signage is expected to 10 years.

In terms of cumulative effects there are many more activities on going in the metropolitan area, ranging from Active Travel initiatives to ongoing planning permissions. The signage project is expected to complement the active travel initiatives in particular as it will help pedestrians and cyclists navigate through this part of Limerick City.

The Construction and Environmental Management Plan which is part of the project documentation, through its various measures, such as control of run off, good work practices and use of shuttering with concrete and measures to prevent run off, its timing of works during daylight hours and its specific reference to Natura 2000 sites reduces the construction effects of the project to level which is not significant.

3.0 EIA Screening Conclusions: The proposed development is a way finding and signage project within part of the Limerick City metropolitan area. It will involve the erection or replacement of a total of 70 signs. The area involved is less than that of the mandatory threshold, while the possible effects on nearby water courses and Natura 2000 sites are reduced by the small scale of the works and the content of the Construction and Management Plan (CEMP) submitted and in many situations by distance from the river. Due to the small scale of the project, the contents CEMP reducing chances of run off to nearby water courses and the fact that the environment in which it is to be carried out is highly urbanised it is not considered that an Environmental Impact Assessment Report (EIAR) is necessary.