Limerick City and County Council.



Limerick Way Finding and Signage Project Appropriate Assessment Screening.

August 2023.

Contents:

1.0 Introduction	p.3
2.0 Appropriate Assessment Process and Legislation	p.3
3.0 Works description	p.4
4.0 Screening Matrix	p.14
5.0 Findings of no significant effects matrix	p.20
6.0 Concluding statement	p. 24

Appropriate Assessment Screening – Limerick Way finding and Signage Project.

1.0 Introduction: This Appropriate Assessment Screening Document is for the Limerick Way Finding and Signage Project. The works are described in section 3 below. The screening is in accordance with the requirements of Article 6(3) of the EU Habitats Directive (92/43/EEC). It is the first step in establishing whether or not projects will have possible effects on a Natura 2000 site. The principal consideration for an Appropriate Assessment would be if the proposed works were likely to have significant effects on a Natura 2000 site – Special Areas of Conservation and Special Protection Areas (SACs and SPAs) are Natura sites.

2.0 Appropriate Assessment Process and Legislation: The Appropriate Assessment process is carried out to establish if any proposed plan or project is likely to have a significant effect or impact on any site that has been designated under the E.U. Habitats Directive (92/43/EEC) i.e., SAC; or the E.U. Birds Directive (79/409/EEC as amended 2009/147/EC) i.e., SPA. Both types of site are present in this situation. Collectively, SAC's and SPA's are known as Natura 2000 sites. There are several stages to this process. The need to carry out this process has arisen from Articles 6(3) and 6(4) of the Habitats Directive; where the Article 6(3) is primarily concerned with the protection of sites from likely significant effects and Article 6(4) allows derogation from such protection in very specific circumstances involving imperative reasons of overriding public interest.

Article 6(3) of the Habitats Directive requires that:

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

And Article 6(4) of the Habitats Directive requires that:

"If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried

out for imperative reasons of overriding public interest, including those of a social or economic nature, the Member State shall take all compensatory measures necessary to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted."

In Stage 1, a screening process is undertaken to identify likely significant effects on a Natura 2000 site are likely to arise from the project or plan in question. This is the current stage in the process. Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities (February 2010) states that "its purpose is to determine, on the basis of a preliminary assessment and objective criteria, whether a plan or project, alone and in combination with other plans or projects, could have significant effects on a Natura 2000 site in view of the site's conservation objectives"

The Planning and Development Act 2000 (as amended) in S177U states the following: "a screening for appropriate [assessment for consent for a proposed development] shall be carried out by the competent authority to assess, in view of best scientific knowledge, if that proposed development, individually or in combination with another plan or project is likely to have a significant effect on the European site.

If significant effects are likely to occur or if it is unclear whether significant effects are likely to occur, then the process continues to Stage 2 where an AA considers potential mitigation measures for adverse effects. If mitigation measures will not be able to satisfactorily reduce potential adverse effects on a Natura 2000 site then an assessment of alternative solutions is considered in Stage 3. This is then followed by Stage 4 in the event that adverse effects remain and the proposed activity or development is deemed to be of Imperative Reasons of Overriding Public Interest (IROPI), allowing an assessment of compensatory measures to be considered. The outcome of a Stage 2 and higher assessment is presented in a report known as a Natura Impact Statement (NIS). While an AA NIS is provided by the advocate of the plan or project in question, the AA NIS itself is undertaken by the competent authority.

3.0 Works Description: 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 Limericks urban environment. The red shading in the pictures indicate the extent of the alternative

nearby locations which might be used. These are immediately adjacent to the

original location chosen.



Figure 2: Monolith, map marker sign. Proposed location is close to Thomond Bridge.



Figure 3: finger post sign in proposed location on intersection between castle Street and Island Road.



Figure 4: Low marker sign located in proposed location on Nicholas Street.

The proposed signage will often be located on existing structures such as poles 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 indeed the sheer amount of unnecessary and often outdated signage. The Limerick Way Finding and Signage project is the latest and most comprehensive of these initiatives.

The following pictures indicate some of the locations where signage will be replaced on a one for one basis. All are heavily modified urban locations, with footpaths walls other built elements and are subject to constant traffic either pedestrian or vehicle. What is not evident from the pictures but is present is also street lighting.



Figure 5: one sign, close to Merchants quay and the river due for replacement under the project.



Figure 6: sign at Sarsfield bridge junction, also due for replacement.



Limerick city centre map illustrating the locations of proposed signage and designated areas (SAC/SPA)



Figure 7: Shows locations of proposed signage with nearby Natura 2000 sites.

Two Natura 2000 sites are closest, the Lower River Shannon Special Area of Conservation Site (002165) immediately north and west of the proposed works (See Figure 2). Nine signs are located within the boundaries of the Lower River Shannon SAC site. The second site is the River Shannon and Fergus Estuary (004165) Special Protection Area (SPA). This is also located along the Shannon and is designated for wintering wildfowl. It is just to the west of the area of the proposed signage. It is not necessary to consider other Natura 2000 sites, due to distance and lack of hydrological connection and the localised scale of the works, which are essentially modifications and additions to street signage and furniture, within a heavily modified urban environment.

Table 1 Distance to Natura 2000 sites.

Natura 2000 site	Site Code	Distance	Comments
Lower River Shannon SAC site	002165	Nine signs are located within the boundaries of the Lower River Shannon SAC site.	This is north and west of the development site and the one most likely to be affected by any works.
River Shannon and Fergus estuaries	004077	Two signs within the SPA.	Used by wildfowl both resident and wintering.
Other Natura 2000 sites have been discounted.	Not Applicable.	The lack of ex situ effects of the signage projects means that Natura sites farther away are beyond any effects they can generate.	There is no hydrological or other connection between the development site and other Natura 2000 sites

Survey methodology: Surveys were carried out on the 27th and 28th of July and the 21st of August. Given the modified nature of the metropolitan area this is considered sufficient. The individual signage footprints of the proposed development has already been heavily modified and lies within an existing urban complex.

On site habitats: There are only artificial habitats on the signage sites, Buildings and Walls, and Amenity Grassland. These are common habitats with no links to Qualifying Interest habitats of any of the Natura 2000 sites network. Qualifying interest habitats and species are those of particular ecological interest and are the reason for the designation of these sites. There are no links between onsite habitats and those qualifying interests. The qualifying interests habitats and species for both sites are presented in the following tables.

Table 2: 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 lapponica) [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

Comments: Some sources in literature (*Sutherland and Hill eds., 1995, pp. 44 to 45.*) indicate that the disturbance distance from wildfowl is generally 100-200m. Noise, light and movement can be particular causes. However in the case of the location of the signage close to the river, these areas have long histories of human activity to which wildfowl have become accustomed. In this context the addition of signage, which is immobile and is not illuminated is not likely to cause any disturbance effects. In addition given its location within the existing streetscape it is not likely to pose any additional collision risk.

The construction phase has also be viewed in the contexts of pre-existing human activity and traffic, with its movement and lights. The small scale of any works associated with the erection of signage is likely to be hidden by the daily passage of pedestrians and vehicles in any of the riverside locations. As a result it is not likely to contribute to any significant disturbance effects. The scale of the works makes any run off from construction activities small and unlikely to be significant, given background run off from the urban area and standard measures designed to prevent water pollution inherent in any works.

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 for each signage location are put forward to ensure any chances 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.

Given both the scale of the works which is small and the use of standard measures, such as those referred to above, it is not considered that any significant adverse effects would result for either the species or habitats of the SAC site or the species of SPA site

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 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.

Table 4: On site habitats and relations 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.

Table 5 Effects of the works on site habitats.

Works	Habitats affected	Effects	Comments
Erection of	Previously	Limited as it's	Effects limited to
signage and	modified area	within existing an	small scale of
removal of some	within existing	urban complex.	works and are
signage stock.	farmyard.		screened by
			existing urban
			activities. The
			contents of the
			CEMP also
			ensures that
			standard good
			practice
			measures apply.

Neighbouring land uses: lands immediately around the signage areas are urban related. These would be footpaths, walls, amenity grasslands, all heavily modified environments. This is reflected by the fact that much of the land area is zoned for city centre use, which in itself reflects the degree of human activity in the area.

2.0 Screening Matrix

Brief description of the project:

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 indicated in Figures 2, 3 and 4 above.

Brief description of the Natura 2000 sites:

Two Natura 2000 sites are closest, the Lower River Shannon Special Area of Conservation Site (002165) immediately north and west of the proposed works (See Figure 5). The second site is the River Shannon and Fergus Estuary (004165) Special Protection Area (SPA). This is also located along the Shannon and is designated for wintering wildfowl. It is just to the west of the area of the proposed signage. It is not necessary to consider other Natura 2000 sites, due to distance and lack of hydrological connection and the localised scale of the works, which are essentially modifications and additions to street signage and furniture, within a heavily modified urban environment.

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

Due to the nature of the works and its location within an existing urban area with a large amount of human activity and movement and lighting it is considered that the possibility of significant effects on the lower River Shannon SAC site is small, as the effects of the construction phase will be hidden by pre-existing activity. The limited area of the works and the distance from sites (other than the Lower River Shannon or the River Shannon and Fergus estuaries means that there will be no effects on these sites. Post construction the signs themselves will not be illuminated or have moving parts so no disturbance effects on the bird species for which the SPA was designated are anticipated.

Additional notes:

The major effects on the river in the immediate catchment would be from agricultural activity upstream with diffuse sources of nutrients ending up in the river from fertiliser and organic fertiliser applications. The construction of the signage with its limited development footprint is not anticipated to add to the sediment or pollutant load in the river, due to fact that most of the signage is at sufficient distance from the river to ensure an adequate buffer. For those close to the river the small scale of works ensures that significant effects are not likely. There are also site specific standard good practice measures listed in the CEMP for each of the signage locations.

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

• Size and scale;

The area of in which the works are taking place is shown In Figure 7. The footprint of the individual signage can be assessed from figures 2 to 5. All are located within an existing urban environment which has already been modified and is subject to human disturbance.

Land-take;

There are no land take implications in that the works involved are taking place within an existing urban complex. In many situations the signage will be erected on or close to areas where previous signage had existed, which is an already modified environment, with highly modified artificial habitats unlikely to be used by the Qualifying interest species of the Natura 2000 sites. See Figures 5 and 6 above as examples.

Distance from Natura 2000 site or key features of the site;

The Lower River Shannon Special Area of Conservation Site (002165) is immediately north and west of the proposed works (See Figure 7). Nine signs are located within the Natura 2000 sites, but these are in heavily modified urban environments, see Figures 2 to 6 above. The second site is the River Shannon and Fergus Estuary (004165) Special Protection Area (SPA). This is also located along the Shannon and is designated for wintering wildfowl. It is just to the west of the area of the proposed signage

Resource requirements (water abstraction etc);

There are no resource implications, it is not anticipated that any extraction of material – rock etc or soil or abstraction of water would take place from the Shannon or its tributaries.

Emission (disposal to land, water or air);

The risk is limited. As outlined above the new works will be limited in scale and as such the generation of sediment laden run off or that from cement based products is not regarded as significant. The Construction and Environmental Management Plan (CEMP) produced as part of the works documentation, contains standard good practice measures to deal with these issues. These are site specific depending on the risks

involved. Figures 2-4 indicate the scale of works associated with individual signage locations.

Excavation requirements;

It will not be necessary to excavate outside the modified urban environment, thereby minimising effects on more natural habitats within the Natura 2000 network. The areas in which any excavation might take place are already heavily modified.

Transportation requirements;

All materials required for the site will be transported there by existing public roads, there will be no requirement for fresh routes to be established through any Natura 2000 site.

Duration of construction, operation, decommissioning, etc;

Works will be expected to last over a two month period and are likely to be carried out in the spring / summer of 2024. Operation is likely to be for a period of 10 years or so, which would be generally be the design life span of signage.

Other

None.

Describe any likely changes to the site arising as a result of :

reduction of habitat area:

Not applicable, the majority of the signage works are outside the Natura 2000 network and even when within are within an urban environment (see figures 2 and 6). As indicated above there are no habitats which relate to any of the Qualifying Interests of either the SPA or SAC so there are no implications for Article 10 of the Habitats Directive which deals with ecological networks of suitable habitats outside designated sites.

• habitat or species fragmentation;

No fragmentation effects expected. As indicated above the signage sites are outside the river and within a heavily modified urban environment.

• reduction in species density;

None-see above re location of the development site within the urban area.

changes in key indicators of conservation value

None expected -see last comment.

• Climate change:

Given the limited nature of the works no effects are anticipated. In the longer term, with more efficient utilisation of signage, there may be positive implications as there will be a signage network which would facilitate walking and cycling within the city.

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

• interference with the key relationships that define the structure of the site;

None, the works are limited in scale and the effects during the construction phase will be temporary in nature. Given the limited area of works and the static nature of the signage it is not considered that there will be any effects on the Natura 2000 site during the operational phase. They will not create any additional disturbance effects for bird species using the SPA for example.

• interference with key relationships that define the function of the site;

See above.

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

loss;

None, the minor nature of the works and modified nature of the urban environment means there will be no loss of habitat. There will be no change in land use activity following the development so the usage of the river by wintering and resident birds in the nearby Special Protection Areas and outside during the winter months in particular would not be affected.

Fragmentation;

None- see comment above regarding the location of the works within the urban area and the type of habitats involved which would not contribute to an Article 10 network. See also note regarding unchanged land use which would not affect usage of the river by wintering wildfowl.

• Disruption;

None- the development areas are within the heavily modified metropolitan area, where constant human activity would screen the effects of the signage particularly during the construction phase where such effects would be greatest.

Disturbance;

Any activity would be within the existing urban complex which has had a long established pattern of usage in this area.

The SPA site has been designated for wintering wildfowl. One source mentions that "tolerance distances for most waterfowl is between 100 and 200m" (Sutherland and Hill, 1995 pp.44-45). Most of the signage is over 200m away from the river and that which is closest is limited in scale and will not have lighting and moving parts which ensues its effects on the river and its designated sites is limited. Construction effects would be masked by background traffic and would only occur between 8AM and 6 PM. In many situations it will be replacement of existing signage, avoiding an unnecessary addition of objects along the river.

• change to key elements of the site (e.g. water quality etc);

None- see comments above regarding the limited scale of proposed works within what is already a heavily modified urban environment. The works also include a Construction and Environmental Management Plan which includes a range of standard measures which deal with possible pollution risks. These are tailored to each signage site.

Describe from the above those elements of the project or plan, or combination of elements, where the above impacts are likely to be significant or where the scale or magnitude of impacts are not known.

As indicated above the minor nature of the works and pre-existing human disturbance in a city centre area, serves to hide any potential development works reducing the possibility of adverse effects to a level that is not regarded as significant.

The usage of the river by wintering wildfowl from the SPA site will not be affected as the proposed development will not result in a change of land use within the urban area. The signs being located within the range of existing street furniture will not pose a collision risk or cause additional disturbance. They have no moving parts or lighting and often consist of replacement of existing signage on a one for one basis.

3.0 Finding of No Significant Effects Matrix

Name of Project:	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.
Name and location of Natura 2000 sites:	Two Natura 2000 sites are closest, the Lower River Shannon Special Area of Conservation Site (002165) immediately north and west of the proposed works (See Figure 5). The second site is the River Shannon and Fergus Estuary (004165) Special Protection Area (SPA). This is also located along the Shannon and is designated for wintering wildfowl. It is just to the west of the area of the proposed signage. It is not necessary to consider other Natura 2000 sites, due to distance and lack of hydrological connection and the localised scale of the works, which are essentially modifications and additions to street signage and furniture, within a heavily modified urban environment.
Description of the Project or Plan	Management and erection of signage within the metropolitan area of Limerick. It is a project designed to rationalise the signage stock of the area and provide a more legible and easily interpreted signage stock for Limerick's urban areas.

Is the Project or Plan directly
connected with or necessary to the
management of the site (provide
details) ?
Are there other projects or plans
that together with the project of

No

Are there other projects or plans that together with the project of plan being assessed could affect the site (provide details)? The Limerick Development Plan with its zoning template informs the type of zoning and hence development that will take place in the metropolitan area as whole and in the area in question. There is a diverse range of applications ongoing, including housing and retail taking place within the area. All of these are located within appropriately zoned areas and with sufficient infrastructure for their adequate servicing, including adequate waste water capacity. Cumulatively these, with the current project, are unlikely to affect the sites.

The Assessment of Significance of Effects

Describe how the project or plan (alone or in combination) is likely to affect the Natura 2000 sites:

It is not considered that the works will have any significant effects upon the either the SPA or the SAC site for the following reasons:

1 The works area is not within any Natura 2000 designated site. The works are limited in scale. The limited scale of works and its area specific nature means that effects would be confined to 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 Man	agament Plan
		Environmental Management Plan (CEMP) for these works.	
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		relevant for those signs which are closest to the Special Protection Area.	
		·	
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		degree of excavation	• •
		limited amount of c	
		products required re	
		of signage erection	insignilicani.
Explain why these	effects are not	Because of the limi	ted scale of the
considered significant:		works, and no expansion of works	
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M.Agr.Science,		
MSc (Ecological	Site visits and	
Assessment) and	site surveys.	
Dip. EIA (Mgmt.)	-	

It is considered that due to the current scale of works that <u>progression to full Appropriate Assessment is not necessary</u>, and that there are no likely effects of the works on any Natura 2000 site.

This is for the following reasons:

- 1 The works area is not within any Natura 2000 designated site. The works are limited in scale. The limited scale of works and its area specific nature means that effects would be confined to 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.
- 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 the Special Protection Area.
- 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. This can be seen from the Figures 2 to 4 and the red shading associated with possible movement of the signage. In many situations other service providers under other consent systems such as telecommunications or water supply carry out maintenance works of greater scale within the metropolitan area on a daily basis. This does not result in adverse effects on either the SAC or SPA site, even with greater excavation required than is the case with the current project. 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.
- **6.0 Concluding statement:** due to the limited scale of the works, their location within a previously modified urban environment and fact that the area is already subject to constant human presence, the overall effects of both the construction

and operation of the way finding and signage project is considered to be minor and would not have significant effects on the nearby Natura 2000 sites.

Sources:

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