

Planning Department  
Limerick City and County Council  
Dooradoyle Road  
Dooradoyle  
Limerick  
V94 WV78

Friday, 28<sup>th</sup> February 2025  
[Submitted via LGMA Planning Portal]

Dear Sir/Madam,

**RE: PROPOSED AMENDMENTS TO PERMITTED STRATEGIC HOUSING DEVELOPMENT (ABP REG. REF. 311588-21) FOR LANDS AT THE FORMER GREENPARK RACECOURSE, DOCK ROAD, LIMERICK CITY, LIMERICK.**

On behalf of Voyage Property Limited, the Applicant, please find the enclosed Large Scale Residential Development (LRD) Planning Application comprising proposed amendments to a previously permitted Strategic Housing Development (SHD) (An Bord Pleanála Ref. 311588-21) in respect of lands at the Former Greenpark Racecourse, Dock Road, Limerick City, Limerick.

In summary, planning permission was granted by An Bord Pleanála on 30<sup>th</sup> March 2022 for a Strategic Housing Development (SHD) (ABP Reg. Ref. 311588-21) comprising 371 no. residential units (including 157 no. houses, 214 no. apartments, and a creche).

It should be noted that 2 no. residential units were omitted from the SHD scheme via Compliance, as part of the detailed design process. This omission was deemed to comply with Condition No. 15 of the Parent Permission. A copy of the letter from Limerick City and County Council, dated 30<sup>th</sup> January 2025, confirming same is enclosed in Appendix B.

Therefore, the total number of residential units permitted as part of ABP Reg. Ref. 311588-21, has been reduced from 371 no. to 369 no., on foot of the above

The amendments proposed as part of this LRD Application relate solely to Apartment Blocks A and B, and the associated areas immediately surrounding and between these Blocks.

The proposed development is described as follows:

*"Voyage Property Limited intends to apply for permission for a Large-Scale Residential Development (LRD) comprising amendments to a previously permitted Strategic Housing Development (SHD) (An Bord Pleanála Reg. Ref. 311588-21) with a total application site area of c. 10.5Ha (with a substantive residential site development area of c. 7.9Ha), on lands at the Former Greenpark Racecourse, Dock Road, Limerick, principally bounded by existing undeveloped lands to the north, south, and west and the adjoining Log na gCapall Housing Estate and Greenpark Avenue to the east.*

*The proposed amendments relate solely to the previously permitted Apartment Blocks A and B, and the areas between and immediately surrounding these Blocks.*

*The development will consist of: the relocation of bin stores within permitted service area located between Apartment Blocks A and B; provision of ESB substation with associated switch room within service area; omission of bicycle parking within service area; associated amendments to footprint and elevational arrangement of service area; change of use of 2 no. permitted Ground Floor units within Apartment Block A from ancillary residential amenity use to residential use (to provide 2 no. 2-bedroom apartments with associated private terraces); change of use of permitted plant rooms at Ground Floor Level of Apartment Blocks A and B for use as bicycle storage; provision of cleaners store and smoke shaft at Ground Floor Level of Apartment Block A; minor internal design revision at Ground Floor Level at Apartment Block A; minor elevational amendments to Apartment Blocks A and B; minor revisions to hard and soft landscaping; minor revisions to cycle parking arrangements; cabling and ducting; and all associated site development and excavation works above and below ground.*

*The proposed amendments will not result in any changes to the Gross Floor Area of Apartment Blocks A and B."*

The proposed development will result in a total of 371 no. residential units on site, the same number as was originally permitted.

### **Red-line Boundary**

The same red-line boundary for the original SHD Application has been utilised for the subject amendment LRD Application. The area of proposed works is limited to what is delineated on the enclosed 'Proposed Site Layout Plan' (Dwg. No. GPL-02-SW-XXX-DR-RAU-AR-1100) prepared by Reddy Architecture + Urbanism. The majority of the subject site is in the ownership of the Applicant, Voyage Property Limited, whilst a portion of the lands are in the ownership of Arrowdale Limited. A Letter of Consent has been provided by Arrowdale Limited for inclusion of their lands within the red-line boundary for this Application. We highlight that all proposed works are contained within the lands in the ownership of the Applicant.

Please refer to the enclosed 'Ownership Map' prepared by Punch Consulting Engineers for full details.

### **Part V Provision**

The proposed development consists of the provision of 2 no. new residential units, which will increase the number of units on site back to the originally permitted 371 no. units. Therefore, the required Part V provision will not increase, above and beyond that previously permitted and agreed upon as part of the parent permission (ABP Reg. Ref. 311588-21).

### **Legislative Context for Proposed Alterations to a SHD Permission**

From the outset, we highlight that under Section 34(3C)1 of the Planning and Development Act 2000, as amended, the Planning Authority is limited to evaluating only the amendments proposed under the subject application, rather than the entire consented SHD scheme as a whole.

*“(3C) In determining an application for permission that relates to a development in respect of a part of which permission has previously been granted—*

*(a) under section 9 of the Planning and Development (Housing) and Residential Tenancies Act 2016, or*

*(b) on foot of an application in accordance with section 32A,*

*the planning authority concerned shall, notwithstanding section 34(2)(a), **be restricted in its determination of the application**, other than in respect of any assessment of the effects of the proposed development on the environment, **to considering the modifications proposed by the applicant to the previously permitted development** and for the purposes of determining such an application the reference in subsection (6) to ‘the development concerned’ shall be read as a reference to ‘the modifications to the previously permitted development’.* [Our emphasis.]

Therefore, based on the above, current planning policies, objectives, and development management standards should not be applied retroactively to the already consented SHD scheme, which already holds planning permission. Instead, only the proposed amendments should be assessed against the current policy context, without reassessing the entire scheme.

### **LRD Application Requirements**

A Pre-Application Consultation Request (Section 247) was submitted to Limerick City and County Council (LCCC) on 18<sup>th</sup> November 2024, in respect of the proposed Large-Scale Residential Development (Pre-Application Consultation Ref. LRD1014758). A Letter from Limerick City and County Council, dated 23<sup>rd</sup> January 2025, confirms the decision of the Local Authority that the subject Application could bypass the Section 247 and Section 32B stages and proceed to lodgement stage, subject to the provisions of Section 247(7) of the *Planning and Development Act, 1964*. A copy of determination is provided in Appendix C of this Letter.

The LRD planning application has been submitted through the Local Government Ireland Planning System. Uploaded to the online portal is a fully completed ‘LRD Planning Application Form (Form 19)’, alongside the required LRD drawings and documents.

The planning application may also be inspected online at the following website: [www.greenparklrd.ie](http://www.greenparklrd.ie).

An EFT payment of €1,310.00 has been submitted to Limerick City and County Council. A copy of proof of payment is enclosed as an Appendix to the 'Limerick City and County Council Planning Application Form'. The basis of this planning fee is outlined in the table below.

Class of Development	Amount of Fee	Total
13	€80 or €10 per 0.1Ha = €10 x 10.5Ha	€1,050.00
14(b)	€130 per unit = €130 x 2	€260.00
<b>Total</b>		<b>€1,310.00</b>

We look forward to receipt of a written acknowledgement of this application.

Please revert to the undersigned with any queries arising.

Yours sincerely,



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**John Gannon**  
**Director**  
**Tom Phillips + Associates**  
Encl.

**Appendix A – Schedule of Documents and Drawings Accompanying this LRD Planning Application.**

**Appendix B – Letter from Limerick City and County Council, dated 30<sup>th</sup> January 2025, confirming Compliance with Condition No. 15.**

**Appendix C – Determination from Limerick City and County Council, dated 23<sup>rd</sup> January 2025, to bypass Section 247 and Section 32B.**

**Appendix D – Letter of Support from Clúid Housing, dated 7<sup>th</sup> February 2025.**

## APPENDIX A

### SCHEDULE OF DOCUMENTS AND DRAWINGS ACCOMPANYING THIS LRD PLANNING APPLICATION

The following information accompanies the LRD Planning Application and has been submitted via the Local Government Ireland Planning System.

TOM PHILLIPS + ASSOCIATES	
Title	Date
Planning Cover Letter (Incl. Schedule of Enclosures, Letter from LCCC re Condition No. 15 of Parent Permission, Letter from LCCC to bypass S247 and S32B, and Letter of Support from Clúid Housing)	28 <sup>th</sup> February 2025
LCCC Application Form (Incl. Proof of Fee Paid)	28 <sup>th</sup> February 2025
LRD Application Form (Form 19)	28 <sup>th</sup> February 2025
Letter of Consent from Applicant to Agent	14 <sup>th</sup> February 2025
Letter of Consent from Landowner (Arrowdale Limited)	14 <sup>th</sup> February 2025
Copy of Site Notice	28 <sup>th</sup> February 2025
Copy of Newspaper Notice	28 <sup>th</sup> February 2025
Planning Report/Statement of Consistency (Incl. AA Screening)	28 <sup>th</sup> February 2025

REDDY ARCHITECTURE + URBANISM		
Documents		
Document Number	Title	Date
-	Design Report	February 2025
-	Housing Quality Assessment	February 2025
-	Issue Sheet	February 2025
Drawings		
Drawing Number	Title	Scale
GPL-02-SW-ZZZ-DR-RAU-AR-1000	Site Location Plan	1:2,500 @ A1
GPL-02-SW-ZZZ-DR-RAU-AR-1100	Permitted Site Plan	1:500 @ A1
GPL-02-SW-ZZZ-DR-RAU-AR-2000	Permitted Contiguous Elevations	1:500 @ A1
GPL-02-SW-ZZZ-DR-RAU-AR-1200	Proposed Site Plan	1:500 @ A1
GPL-02-SW-ZZZ-DR-RAU-AR-2100	Proposed Contiguous Elevations	1:250 @ A1
GPL-02-AB-L00-DR-RAU-AR-1000	Permitted & Proposed Ground Floor Plan	1:200 @ A1
GPL-02-AB-L00-DR-RAU-AR-2000	Permitted General Sections	1:200 @ A1
GPL-02-AB-ZZZ-DR-RAU-AR-2001	Proposed Sections	1:200 @ A1
GPL-02-AB-ZZZ-DR-RAU-AR-3000	Permitted & Proposed Elevations 1	1:200 @ A1
GPL-02-AB-ZZZ-DR-RAU-AR-3001	Permitted & Proposed Elevations 2	1:200 @ A1
GPL-02-AB-XXX-DR-RAU-AR-3350	Permitted Bin Store Plans, Sections & Elevations	1:100 @ A1
GPL-02-AB-XXX-DR-RAU-AR-3360	Proposed Bin Store Plans, Sections & Elevations	1:100 @ A1

PUNCH CONSULTING ENGINEERS		
Documents		
Document Number	Title	Date
-	Civil Engineering Memorandum	20 <sup>th</sup> February 2025
Drawings		
Drawing Number	Title	Scale
231175-PUNCH-XX-XX-DR-X-0402	Ownership Map	1:2,500 @ A1

## APPENDIX B

### LETTER FROM LIMERICK CITY AND COUNTY COUNCIL, DATED 20<sup>TH</sup> JANUARY 2025, CONFIRMING COMPLIANCE WITH CONDITION NO. 15





## APPENDIX C

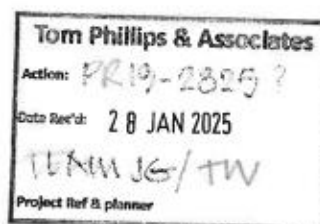
### DETERMINATION FROM LIMERICK CITY AND COUNTY COUNCIL, DATED 23<sup>RD</sup> JANUARY 2025, TO BYPASS SECTION 247 AND SECTION 32B



Pleanáil, agus Cruthú Áite  
Comhairle Cathrach agus Contae Luimnigh  
Bothar Thuar an Daill  
Tuar an Daill, Luimneach  
V94 WV78

Planning and Place-Making  
Limerick City and County Council  
Dooradoyle Road  
Dooradoyle, Limerick  
V94 WV78

Mr. John Gannon,  
Tom Phillips & Associates, 80 Harcourt Street,  
Dublin 2.  
D02F449.



23<sup>rd</sup> January 2025

#### **RE: PLANNING APPLICATION FOR PROPOSED AMENDMENTS TO PERMITTED DEVELOPMENT (ABP REF -311588-21) GREENPARK, DOCK ROAD, LIMERICK**

Dear Mr. Gannon,

I have reviewed your correspondence dated 18/11/24 which relates to a request for a determination under Section 247 (7) of the Planning and development Acts (as amended).

Permission was granted for a Strategic Housing Development of 371 residential units and a crèche, at Greenpark, Dock Road, Limerick. An Bord Pleanála reference ABP-311588-21. I note the following works are proposed:

*'Amendments at Ground Floor Level of Apartment Block A, to omit permitted indoor amenity areas to provide 2 No. additional Universally Accessible Units, with associated elevation alterations, and associated site layout changes, including amendments to bin store, bike store, and provision of new ESB substation'.*

I have reviewed the permitted and proposed development and confirm, in accordance with the provisions of S.247 (7) (a) & (b) of the Planning and Development Act (as amended) that the proposed development is substantially the same as the permitted development, and the nature scale and effect of any alterations to the permitted development are not such that require the consultation process to be repeated.

The planning authority has determined that no pre-planning consultation is required under this section in relation to the proposed development.

You are advised to submit a copy of this determination letter with any relevant planning application. Please note the reference for this is LRD1014758.

customer services@limerick.ie  
www.limerick.ie  
@LimerickCouncil  
061 - 556 000



Comhairle Cathrach  
& Contae Luimnigh

**Limerick City  
& County Council**

Pleanáil, agus Cruthú Áite  
Comhairle Cathrach agus Contae Luimnigh  
Bothar Thuar an Daillí  
Tuar an Daillí, Luimneach  
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Planning and Place-Making  
Limerick City and County Council  
Dooradoyle Road  
Dooradoyle, Limerick  
V94 WV78

Yours faithfully,

**Barry Henn,**  
**Senior Executive Planner.**

✉ [customerservices@limerick.ie](mailto:customerservices@limerick.ie)  
🌐 [www.limerick.ie](http://www.limerick.ie)  
🐦 @LimerickCouncil  
☎ 061 - 556 000



## APPENDIX D

### LETTER OF SUPPORT FROM CLÚID HOUSING, DATED 7<sup>TH</sup> FEBRUARY 2025



159-161 Sheriff Street Upper T 01 707 2088  
Dublin D01 R8N0 E cluid@cluid.ie  
Ireland W www.cluid.ie

**Planning Section,  
Limerick City & County Council,  
Dooradoyle Office,  
Dooradoyle,  
Limerick**

07<sup>th</sup> February 2025

**To whom it concerns,**

Clúid Housing Association (Clúid) has been engaging with Voyage Property Limited (Voyage) to seek proposed amendments to LCC Reg. Ref. 311588-21 on lands at the Former Greenpark Racecourse, Dock Road, Limerick City. The proposed amendments primarily consist of the change of use of permitted Ground Floor residential amenity areas to residential units at Block A, alongside other minor associated site layout, floor layout, and elevational changes.

An arrangement (subject to contract) has now been finalised between Voyage and Cluid for Cluid to purchase the necessary lands to accommodate Blocks A & B Greenpark Place, Greenpark, Limerick and subsequently for Voyage to develop out these apartment blocks on behalf of Cluid to deliver general needs social housing units. The proposed change of use at Ground Floor Level of Block A will allow for the provision of 2 no. additional Universally Accessible units within this block, which will increase the overall social housing provision on site.

It is a well documented fact that there is a shortfall in social housing in Ireland, with over 60,000 households currently on Local Authority waiting lists for housing. There has been an acute need identified in Limerick City, which has resulted in long waiting lists for social housing, with a particular demand identified for general needs social housing and more acutely for people with ambulant disability.

The Housing Department in Limerick City & County Council have provided support for Clúid to deliver this scheme and the local authority will be retaining 100% nomination rights for the units for applicants approved for social housing in the County.

Clúid is an Approved Housing Body (AHB) with over 30 years experience providing housing for people in need. We have provided over 12,000 affordable, high-quality homes across the country, housing c. 31,000 people. Clúid has a proven track record in the delivery of successful social housing schemes and our experience has shown that indoor amenity spaces, such as that permitted at the subject site, require additional management resources, which Cluid will struggle to secure adequate funding for. In addition to this, Clúid has identified through other schemes that the provision of indoor amenity areas can often become a source of anti-social behaviour, leading to the space becoming unused at times.

On balance, the provision of additional Universally Accessible units in place of the permitted amenity space would be preferable to Clúid.

Chair: Mark Shakespeare. Directors: Alun Dawson (British), Eamonn Doyle, Caroline Godsill, David Horgan, Anne McLoughlin, Paul Mooney, David Mullins (British), Deborah Power, Niall Sheridan, Kathleen Stack, and Claire Solon. Company Secretary: Thérèse Allen.  
Clúid Housing is a registered business name of Clúid Housing Association (registered business number 526122).  
Clúid Housing Association is a private company limited by guarantee with a registered office at 159-161 Sheriff Street Upper, Dublin D01 R8N0.  
Company number: 212249. Registered charity number: 20029975. CHY No. 11171. AHB-02839. PSRA Licence: 001415.



Clúid wholeheartedly supports this Planning Application and if you require any additional information, please do not hesitate to contact me.

Kind regards

**James O'Halloran**  
**Head of New Business**

[cluid.ie](http://cluid.ie)