

PLANNING REPORT / STATEMENT OF CONSISTENCY LARGE-SCALE RESIDENTIAL DEVELOPMENT (LRD)

GREENPARK LRD

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



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1.0 INTRODUCTION

Tom Phillips + Associates¹ have been retained by Voyage Property Limited², in association with Reddy Architecture + Urbanism, to prepare this Large-Scale Residential Development (LRD) application in respect of lands at the Former Greenpark Racecourse, Dock Road, Limerick City.

The proposed development constitutes an amendment to a Strategic Housing Development (SHD), as permitted by An Bord Pleanála on 30th March 2022 (ABP Reg. Ref. 311588-21).

The proposed changes primarily consist of the change of use of 2 no. permitted residential amenity areas to provide 2 no. 2-bedroom Universally Accessible residential units at Apartment Blocks A and B and provision of an ESB substation. These proposed changes do not materially alter the nature of the permitted development.

The proposed amendments solely relate to Apartment Blocks A and B and the areas between and immediately surrounding these blocks, as permitted as part of ABP Reg. Ref. 311588-21. A full breakdown of the proposed development is provided in Section 4.0 of this Report.

The design team for this Planning Application is comprised of the following:

- Tom Phillips + Associates – Town Planning Consultants.
- Reddy Architecture + Urbanism – Architecture.
- Punch Consulting Engineers – Civil Engineering.

1.1 Executive Summary

In summary, planning permission was granted by An Bord Pleanála (ABP) for a Strategic Housing Development (SHD) on 30th March 2022 (ABP Reg. Ref. 311588-21) for the provision of 371 no. residential units, comprised of 157 no. houses and 214 no. apartments, as well as a creche. This development is currently under construction.

The proposed site layout changes result from a requirement from the Electricity Supply Board (ESB) for a new substation within the development, to serve the 2 no. permitted apartment blocks.

To facilitate these proposed amendments, minor changes are also required at Ground Floor Level of both blocks and within the areas immediately surrounding the two blocks, including the permitted service area.

Two residential units within the eastern portion of the subject site were agreed to be omitted via Compliance with Condition No. 15(b), therefore the total number of units permitted on site was reduced to 369 no. units.

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Since permission was granted, an arrangement has been made with Clúid Housing Association CLG, an Approved Housing Body (AHB), in respect of Apartment Block A. To meet Clúid's specific housing needs, it was decided to seek a change of use of the 2 no. permitted Ground Floor ancillary residential amenity spaces to facilitate the provision of 2 no. 2-bedroom (4-person) Universally Accessible units. Clúid has stated that the provision of additional residential units at this location would be preferable to them.

These proposed amendments result in the requirement for minor elevational amendments at Apartment Blocks A and B.

We highlight that the provision of these units will result in a total of 371 no. units on site, as was originally permitted under the SHD scheme.

In our view, the proposed revised scheme accords with national, regional, and local planning policy through the provision of additional residential units at an appropriate location. The provision of additional residential units within an emerging area will assist in meeting the current shortfall in housing supply within Limerick City and suburbs.

1.2 Section 247 Pre-Planning Request

A S247 Pre-Planning Meeting Request was submitted to Limerick City and County Council Planning Department on 18th November 2024 in respect of the proposed development (PAC Ref. LRD1014758), as required for all applications for Large-Scale Residential Development.

A letter dated 23rd January 2025 was received from the Senior Executive Planner in Limerick City and County Council, which determined that the subject application could bypass the Section 247 and Section 32B stages and proceed to lodgement stage. The extract below states:

"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."* [Our Emphasis.]

This determination means that the subject application is exempt from the requirement to hold a Section 247 Pre-Application Consultation Meeting or Section 32B (LRD Meeting) Consultation. This determination, under Section 247(7), negates the requirement for an 'LRD Opinion'. No 'Response to LRD Opinion' has therefore been prepared as part of the subject Application.

A copy of this letter is provided as an Appendix to the enclosed 'Planning Cover Letter / Schedule of Enclosures' prepared by Tom Phillips + Associates.

2.0 SITE LOCATION AND DESCRIPTION

The red-line boundary for the overall SHD site measures c. 10.5 Ha (with a c. 7.9Ha substantive residential development site area), however the proposed amendments are contained within the two permitted apartment blocks located within the north-east portion of the subject site (Apartment Blocks A and B) and the areas between and immediately surrounding these blocks.

The SHD site is located c. 2km to the south-west of Limerick City Centre and within the townland of Ballinacurra (Hart). The site is principally bounded by existing undeveloped lands to the north, south (open land, formerly part of the racecourse) and west (open ground with the greyhound track) and the adjoining Log na gCapall Housing Estate and Greenpark Avenue to the east and north-east.

The surrounding area comprises a number of land uses. The primary form of development to the east of the site is low rise residential development. To the north, north-west and west of the site is a number of commercial buildings, with a number of community uses, schools and retail buildings in the vicinity. The Limerick Greyhound Stadium adjoins the Applicant's lands and continues to operate as a greyhound stadium.

The Ballinaclogh River, a tributary of the River Shannon, flows to the south-west of the site but does not directly abut its boundary.



Figure 2.1: Location of the area of proposed works (indicated by red star) in the context of the surrounding area. (Source: Google Maps, as annotated by Tom Phillips + Associates, 2025.)

In terms of proximity and accessibility to the wider environs, the site is located approximately 2km from Limerick City Centre, 1.2km from Crescent Shopping Centre, 1.6km from the Regional Hospital and 4.1km to Raheen Business Park. There are a number of bus routes (e.g. 301 and 304) that service the bus stops closest to the site, including the stops at Lifford Gardens and on the corner of South Circular Road and Ballinacurra Road and provide access to the City Centre.

We highlight that the permitted SHD development is currently under construction at the subject site. No works have begun on the portion on lands in the north-east corner of the site, where the subject amendments are proposed (as delineated in green in Figure 2.2 below). A number of units within the development have completed construction, with some units occupied, as shown in Figure 2.3 and 2.4 below. The location of the permitted apartment blocks is visible to the left of the constructed units in Figure 2.3 below.



Figure 2.2: Extract from Dwg. No. GPL-02-SW-ZZZ-DR-RAU-AR-1200 'Proposed Site Plan', showing the area of proposed works delineated in green (as annotated by Tom Phillips + Associates, 2025).



Figure 2.3: Aerial image of the subject site, facing east, showing the development as constructed in December 2024. (Source: Voyage Property Limited, 2024.)



Figure 2.4: Aerial image of the subject site facing south-west, showing the development as constructed in December 2024. (Source: Voyage Property Limited, 2024.)

2.1 Masterplan Context

The application site is a portion of the former Greenpark Racecourse lands, which measure c. 47Ha in total. This strategically important landholding has been subject to a Masterplanning exercise which provides an indicative framework for the future development of the former Racecourse over a number of phases and future connection into adjoining lands.

This Masterplan informed the parent permission (ABP Reg. Ref. 311588-21) and outlined a multi-phased residential development, office campus, neighbourhood centre, creche, nursing home, with public open spaces. With the potential to deliver 920 no. residential units and 39,500sqm of office floorspace, the Masterplan provides a significant opportunity to contribute to the delivery of housing and employment in the Limerick City area, in line with national, regional and local policy objectives. As well as the previously permitted SHD, a nursing home has been permitted under LCCC Reg. Ref. 21/1222 within the Masterplan lands, as detailed in Section 3.1 below.

3.0 PLANNING HISTORY

A planning history search of the site was conducted using Limerick City and County Council's online planning history search facility and that of An Bord Pleanála, in order to establish the planning history of the subject site. For the purpose of this assessment, we have reviewed the planning history for the wider Greenpark Racecourse lands, which form the Masterplan for the area.

In the interest of clarity, we have omitted any Planning Applications lodged prior to 2000, as we note these related to the former Greenpark Racecourse itself, and its associated facilities, which were removed and/or demolished upon the closure of the racecourse.

Application LCCC Reg. Ref. 21311588 (ABP Reg. Ref. 311588-21), a Strategic Housing Development (SHD) is currently under construction on lands which adjoin the subject site. This represents the first phase of redevelopment on the Greenpark lands since the establishment of the Greyhound Stadium, which opened in 2010. It is this SHD Application which is proposed to be amended by the subject Application and is outlined in greater detail in Section 3.1 below.

Reg. Ref.	Date Lodged	Description	Decision and Decision Date
LCCC Reg. Ref. 01/770130 ABP Reg. Ref. PL30.130232	30/04/2001	Infrastructural development to include new roundabout, road sewers, water mains, other underground services, landscaping.	Grant Permission (Subject to 19 No. Conditions) 05/02/2003
LCCC Reg. Ref. 03/770343	29/08/2003	Permission for a new roundabout on the N69 (Dock Road).	Grant Permission
LCCC Reg. Ref. 05/770014	17/01/2005	Mixed Use scheme comprising 353 residential units and a neighbourhood centre.	Grant Permission (Subject to 25 No. Conditions) 09/03/2007
LCCC Reg. Ref. 07/770237	18/06/2007	To raise land levels using clean inert construction and demolition waste and subsoil.	Grant Permission (Subject to 4 No. Conditions) 12/03/2008
LCCC Reg. Ref. 07/770406	31/10/2007	Signage.	Refused Permission 11/12/2007
LCCC Reg. Ref. 07/770453 ABP Reg. Ref. PL30.230944	29/11/2007	222 housing units comprising 90 no. houses, 78 no. duplex/apartment units, and a 54 no. unit retirement village.	Refuse Permission 09/04/2009
LCCC Reg. Ref. 07/770470	17/12/2007	Greyhound Racing Stadium, including greyhound track and car park.	Grant Permission (Subject to 21 No. Conditions) 01/07/2008

LCCC Reg. Ref. pe770135	25/02/2013	Proposed Extension of Duration for Application Reg. Ref. P05/014	Refuse Permission 17/05/2013
LCCC Reg. Ref. 15/428 ABP Reg. Ref. 246035	16/06/2015	110 housing units comprising of 31 4-bed detached, 4 3-bed semi- detached, 3 3-bed terraced units.	Refuse Permission 19/05/2016
LCCC Reg. Ref. 21/1222 ABP Reg. Ref. 314754-22	31/08/2021	Development for a nursing home and all site development and excavation works above and below ground.	Grant Permission (Subject to 17 No. Conditions) 16/05/2024
LCCC Reg. Ref. 21/311588 ABP Reg. Ref. 311588-21	07/10/2021	SHD - 371 no. residential units (157 no. houses, 214 no. apartments), creche and associated site works.	Grant Permission (Subject to 25 No. Conditions) 30/03/2022

Table 3.1: Overview of the Planning History for the subject site.

3.1 Parent Permission – ABP Reg. Ref. 311588-21

Application ABP Reg. Ref. 311588-21, a Strategic Housing Development (SHD) Application, was lodged on 7th October 2021, directly to An Bord Pleanála. The description of proposed development, as outlined in the statutory notices for this Application, was as follows:

“Voyage Property Limited intend to apply to An Bord Pleanála (the Board) for permission for a strategic housing development with a total application site area of c.10.5 ha (with a substantive residential site development area of c.7.9 ha), 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 Green park Avenue to the east. The application site includes the proposed access road (374m in length, including two lanes for vehicles, a roundabout, cycle lanes and pedestrian footpath) which connects to Dock Road at the north-western corner of the former Green park Racecourse lands and runs adjacent to the Limerick Greyhound Stadium.

The development, with a total gross floor area of c. 36, 879 sq m, will consist of the provision of 371 no. residential units comprising 157 no. two storey houses (consisting of 10 no. 4 bedroom units, 110 no. 3 bedroom units and 37 no. 2 bedroom units); 76 no. three storey duplex units (consisting of 14 no. 3 bedroom units, 38 no. 2 bedroom units and 24 no. 1 bedroom units) and 138 no. apartments (consisting of 92 no. 2 bedroom units and 46 no. 1 bedroom units arranged in 3 no. blocks ranging between 4 and 5 storeys together with communal amenity space) and a two storey childcare facility (550 sq m), including all private, communal and public open space provision (including balconies and terraces, private rear gardens and related play areas); surface car parking (510 no. spaces, including accessible spaces); car sharing provision; electric vehicle charging points; bicycle parking (long and short stay spaces); storage areas; internal roads and pathways; hard and soft landscaping and boundary treatments; piped infrastructural services and connections; plant; revised entrances and tie-in arrangements to adjoining roads, including emergency access via Log na gCapall and

Greenpark Avenue and pedestrian and cyclist access via Log na gCapall; waste management provision; solar panels; attenuation tank and related SUDS measures; signage; public lighting; bulk earthworks; and all site development and excavation works above and below ground. Vehicular access to the site will be from Dock Road, via the proposed access road."

This SHD received a Final Grant of Permission on 30th March 2022, subject to 25 No. Conditions. It is this permitted development which the subject Application seeks to amend. Application ABP Reg. Ref. 311588-21 will be referred to as the 'parent permission' herein.

A Compliance Submission for Condition No. 15(b) of the parent permission was lodged with Limerick City and County Council on 30th October 2024. This submission outlined that due to site and boundary constraints, it was required to omit 2 no. permitted residential units (a duplex) from the eastern portion of the subject site. The omission of these units was agreed through Compliance with this Condition, as confirmed in the response received from Limerick City and County Council, dated 30th January 2025. The omission of these two units through Compliance results in a total of 369 no. residential units permitted on site.

As outlined in Section 3.0 above, this SHD permission is currently under construction.

4.0 OVERVIEW OF PROPOSED AMENDMENTS

The proposed works relate solely to apartment Blocks A and B and their associated external areas located immediately adjacent to the blocks. These blocks are located within the north-east portion of the subject site, as shown in Figure 4.1 below.

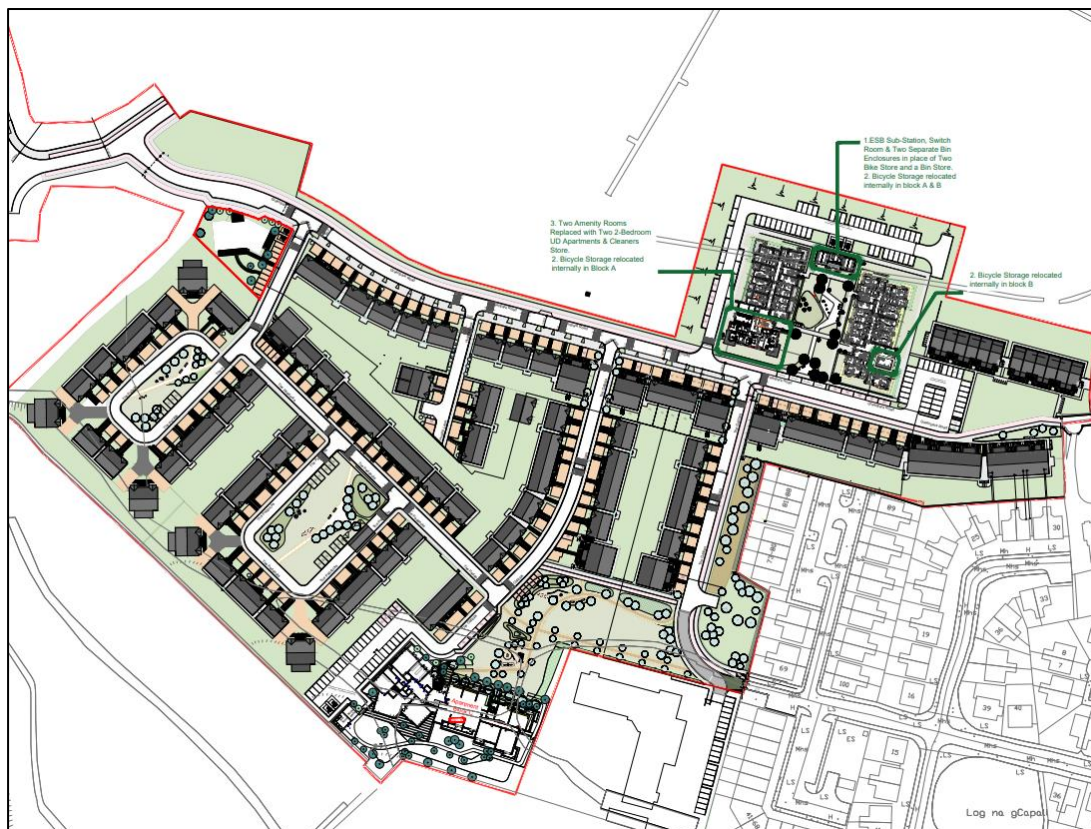


Figure 4.1: Extract from Dwg. No. GPL-02-SW-XXX-DR-RAU-AR-1200 'Proposed Site Plan' prepared by Reddy architecture + Urbanism, showing the proposed site layout.

4.1 Description of Proposed Development

The description of proposed development, as set out in the Statutory Notices, for the proposed development is 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.”

4.2 Breakdown of Proposed Development

4.2.1 Site Layout Changes

Amendments are proposed to the permitted service area located within the northern portion of the communal open space provided between Apartment Blocks A and B. The location of the service area is not proposed to be amended.

The permitted service area measured c. 101.5sqm, comprised of 2 no. 30.2sqm bicycle stores and a c. 35.1sqm bin store. The proposed service area will measure c. 84sqm, comprised of 2 no. bin stores (measuring 31.3sqm and 31.7sqm respectively), a 14sqm ESB substation, and 7sqm switch room.

Long-stay bicycle parking is proposed to be relocated internally within Apartment Blocks A and B, as detailed in Section 4.2.2 below.

The built form, design, and materiality of this service area is also proposed to be amended. The walls and doors to the new bin stores are to be constructed with a vertical timber finish, with a timber finish pergola with mesh above. The walls of the ESB substation and switch room portion of the area will also feature a timber vertical finish, with galvanised doors.

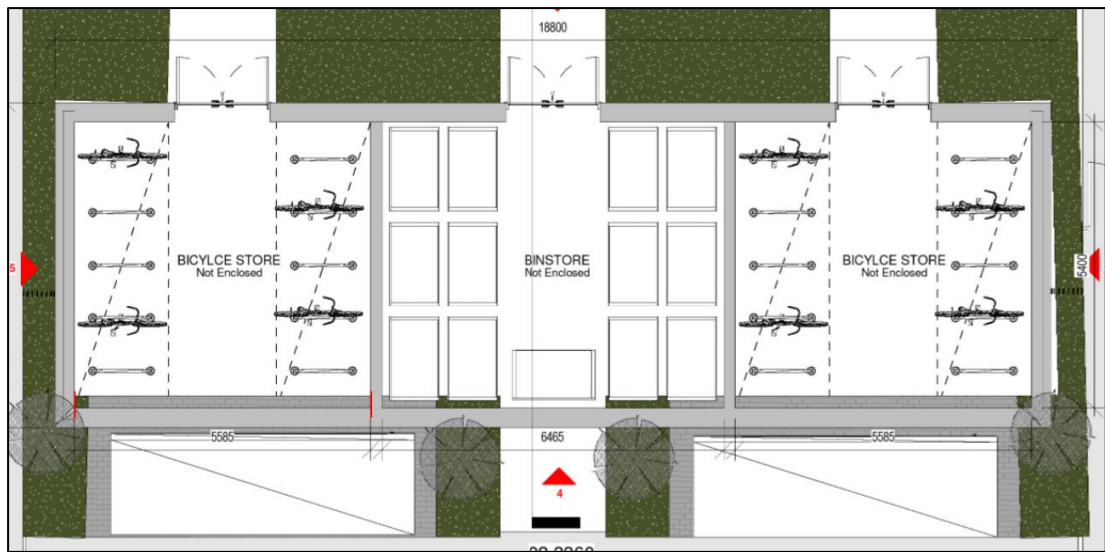


Figure 4.2: Extract from Dwg. No. GPL-02-AB-XXX-DR-RAU-AR-3350 'Permitted Bin Store Plans, Sections & Elevations' prepared by Reddy Architecture + Urbanism, showing the footprint of the permitted service area.

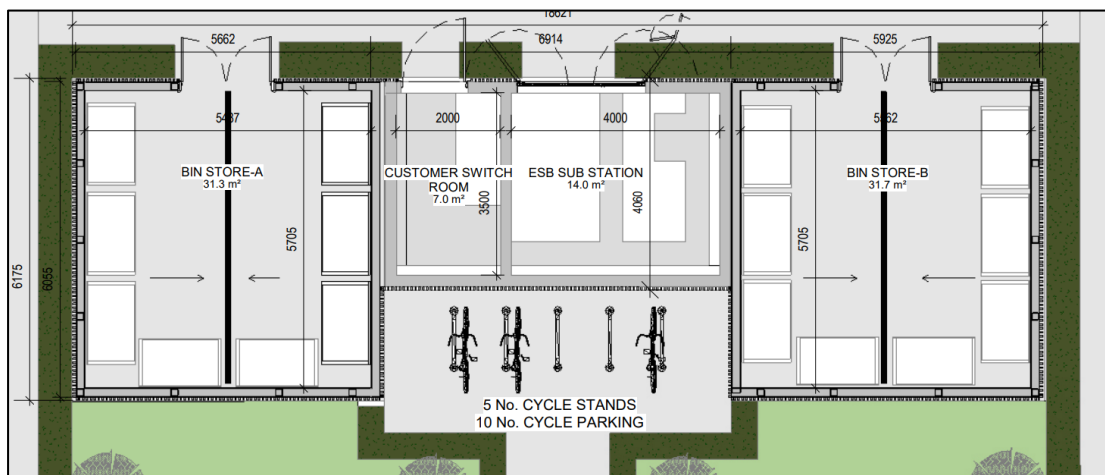


Figure 4.3: Extract from Dwg. No. GPL-02-AB-XXX-DR-RAU-AR-3360 'Proposed Bin Store Plans, Sections & Elevations' prepared by Reddy Architecture + Urbanism, showing the proposed footprint for the service area



Figure 4.4: Extract from Dwg. No. GPL-02-AB-XXX-DR-RAU-AR-3350 'Permitted Bin Store Plans, Sections & Elevations' prepared by Reddy Architecture + Urbanism, showing the built form of the permitted service area.

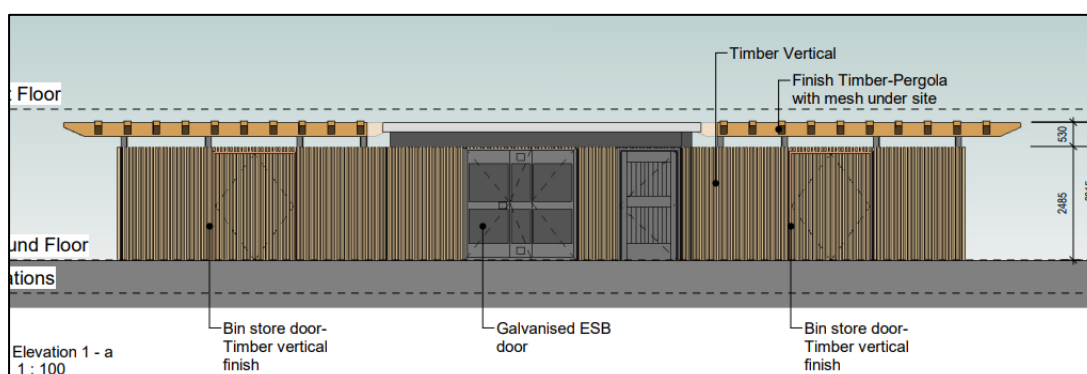


Figure 4.5: Extract from Dwg. No. GPL-02-AB-XXX-DR-RAU-AR-3360 'Proposed Bin Store Plans, Sections & Elevations' prepared by Reddy Architecture + Urbanism, showing the proposed built form and elevations for the service area.

The location of short-stay cycle parking within the areas immediately surrounding and between Apartment Blocks A and B are proposed to be rearranged, to facilitate the proposed amendments to the service area at Ground Floor units within Apartment Block A.

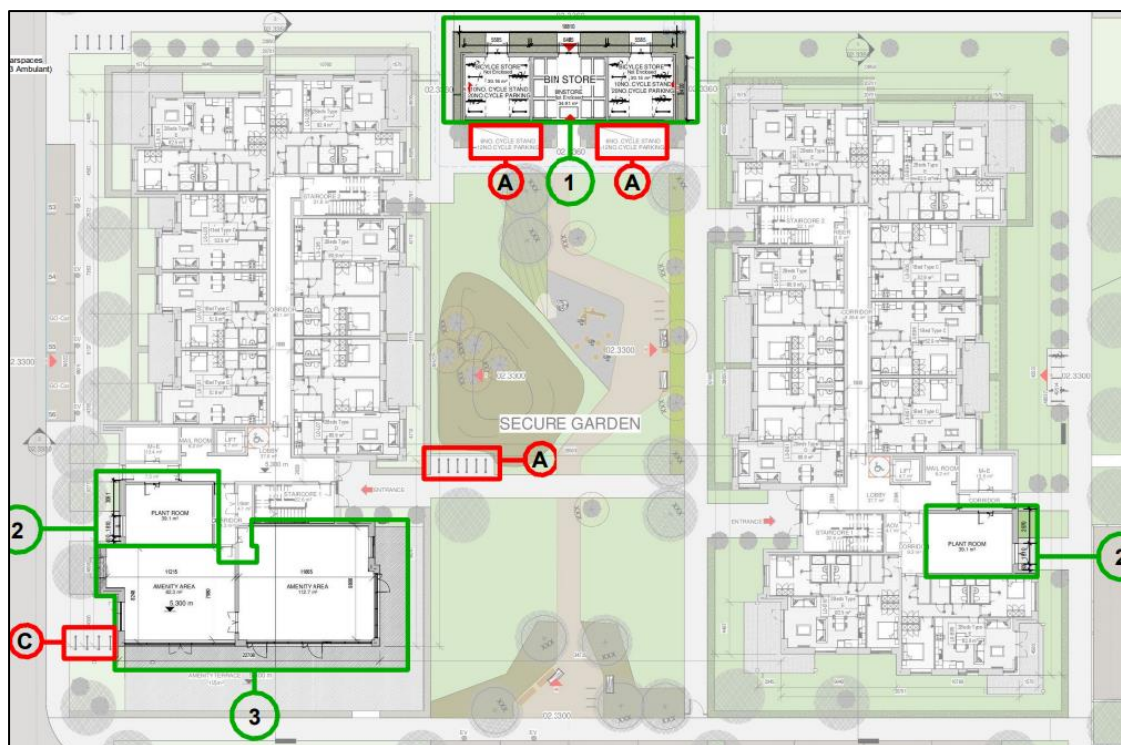


Figure 4.6: Extract from Dwg. No. GPL-02-AB-L00-DR-AU-AR-1000 'Permitted and Proposed Apart. Block A & B - Ground Floor Plan' prepared by Reddy Architecture + Urbanism, showing the permitted site layout for Apartment Blocks A and B.

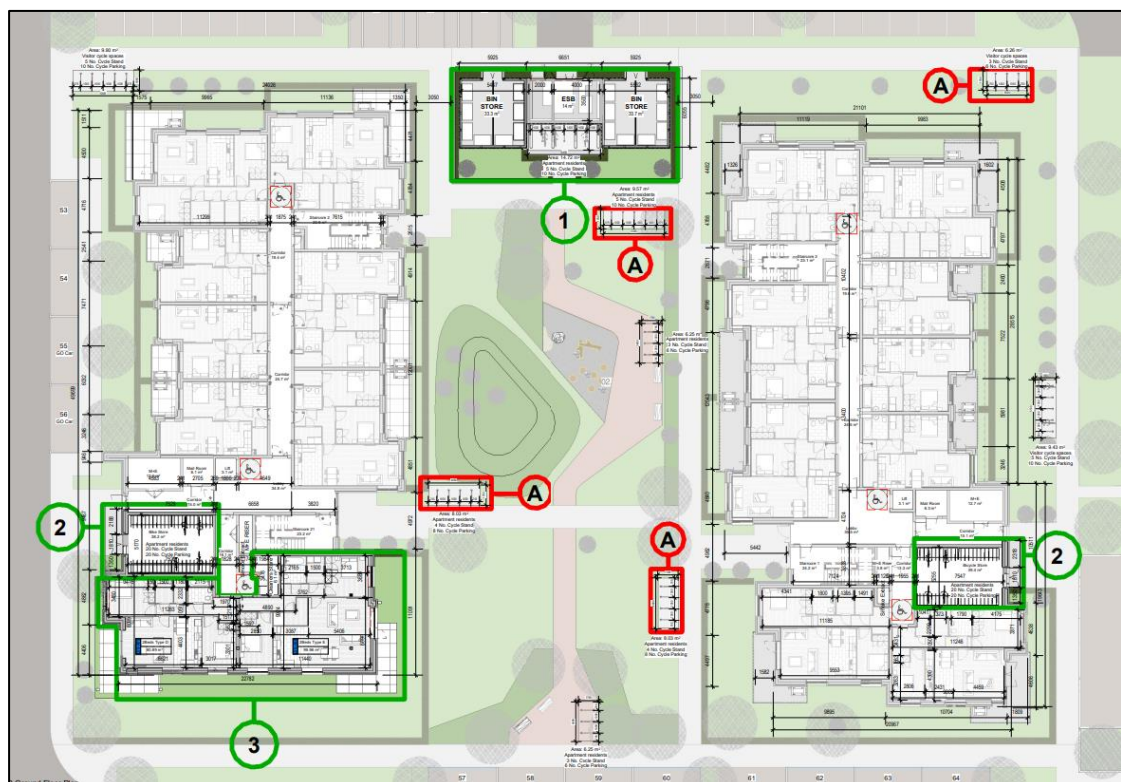


Figure 4.7: Extract from Dwg. No. GPL-02-AB-L00-DR-AU-AR-1000 'Permitted and Proposed Apart. Block A & B - Ground Floor Plan' prepared by Reddy Architecture + Urbanism, showing the proposed site layout for Apartment Blocks A and B.

As will be detailed in further detail in Section 4.2.2 below, minor changes are proposed to the terrace associated with the previously permitted residential amenity areas.

4.2.2 Internal Amendments to Apartment Blocks A and B

It is proposed to change the use of 2 no. permitted Ground Floor units within Apartment Block A from ancillary residential amenity to residential units. The proposed change of use will provide 2 no. 2-bedroom (4-person) Universally Accessible units. These new units, referred to as Units Nos. L0-L08 and L0-L09, will measure c. 80.8sqm and c. 99.9sqm respectively. A new 6.1sqm cleaners store and a smoke shaft have also been provided at Ground Floor Level of Apartment Block A, within the footprint of the previously permitted south-eastern residential amenity area.

The permitted amenity terrace to the south and south-east of Block A (c. 155sqm) is proposed to be amended, to provide private terraces for the 2 no. new residential units (c. 16.0sqm and c. 16.2sqm respectively).

As noted, the bicycle stores are proposed to be relocated from the service area to the previously permitted internal Ground Floor Level plant rooms, within Block A and B, which have been deemed to be redundant. These new bicycle stores will measure c. 38.2sqm and c. 39.4sqm respectively. Internal access to this area has been omitted, with external access only. This has been done to maximise bicycle parking space provision, to maximise security, and to avoid dirt being brought into the corridors from bicycles.

To facilitate the proposed use, internal changes are required, including amendments to the corridor, and provision of all necessary internal walls within the 2 no. units. The corridor which provides internal access to these two new residential units has been increased in size from c. 9.3sqm to c. 16.1sqm, to facilitate universal access.

We contend that the amendment of the permitted residential amenity space to provide new residential units does not constitute a material change of use. We also contend that the amendment of the permitted plant rooms to provide bicycle storage does not constitute a material change of use, with both existing uses considered to be ancillary to the primary residential use of the site.

4.2.3 Elevational Changes

Elevational changes are proposed at Ground Floor Level of Block A, resulting from the proposed change of use from residential amenity to residential units. The proposed new elevational arrangement will match that of the southernmost units of Block B, comprised of selected buff brick with grey mortar, with associated opes.

The proposed elevational changes will reduce the quantum of windows, allowing for increased privacy and functionality of the new Ground Floor residential units.



Figure 4.8: Extract from Dwg. No. GPL-02-AB-ZZZ-DR-RAU-AR-3001 'Permitted and Proposed Elevations 2 – Apartment A & B' prepared by Reddy Architecture + Urbanism, showing the permitted Block A South Elevations.



Figure 4.9: Extract from Dwg. No. GPL-02-AB-ZZZ-DR-RAU-AR-3001 'Permitted and Proposed Elevations 2 – Apartment A & B' prepared by Reddy Architecture + Urbanism, showing the proposed Block A South Elevations.

It is also proposed to amend the permitted wall finish on the stair core at roof level of both Apartment Blocks A and B from black brick finish to rendered finish.

The permitted entrance doors into the previously permitted plant rooms at both blocks have been moved slightly north along the same facades to facilitate the provision of bicycle stands within this area.

For full details of the proposed amendments, please refer to the enclosed Architecture Drawing Pack (and associated Issue Sheet) and 'Design Statement' prepared by Reddy Architecture + Urbanism.

4.3 Rationale for the Proposed Amendments to ABP Reg. Ref. 311588-21

The proposed amendments will allow for the provision of 2 no. new universally accessible residential units within the permitted Apartment Block A, to meet the specific housing needs of Clúid Housing, who will operate and manage Apartment Block A. These units will be contained within the permitted building envelope. While the loss of permitted residential amenity space is regrettable, Clúid has determined that the change of use would be a better use of the space, allowing the charity to provide additional, much-needed, residential units. Please refer to the enclosed letter of support from Clúid Housing for further information.

The proposed changes to the corridors at Ground Floor Level of Apartment Block A are required to facilitate Universal Access to these two new residential units.

The proposed smoke shaft is required for fire compliance purposes and will connect to the previously permitted smoke shaft at the levels above.

The proposed elevational changes at Ground Floor Level of Apartment Blocks A and B are required to facilitate the new residential units and internal bike stores. The elevational amendments to the stair core at roof level are proposed to reduce the visual impact of this element of the building, being less contrasting in colour.

The proposed amendments will also provide for a new substation and switch room, as required by the Electricity Supply Board (ESB). As outlined above, the proposed amendments to the location of the bicycle and bin storage for these apartment blocks are as a result of the need to provide the ESB substation. We highlight that the previously permitted plant stores within Apartment Blocks A and B were deemed obsolete, due to their large size, and the provision of the bike stores within this area is seen as a better use of the space, providing more secure long-stay parking.

The proposed changes to the cycle parking will increase the total number of bicycle parking spaces from 498 no. to 502 no., dispersed across the entire SHD site. We contend that this provision of 4 no. cycle parking is appropriate in the context of the overall quantum of residential units proposed being equal to that originally permitted. Therefore, the proposed amendments will result in a net gain for cycle parking provision for the wider development.

The proposed amendments to the built form and materiality of the service area are required to facilitate the proposed provision of an ESB substation at this location, as well as being considered more visually appealing.



We highlight that no changes are proposed to the permitted building footprint of either Block, therefore there will be no change to the permitted Gross Floor Area of the development.

Further to this, we highlight that as outlined earlier in this Report, 2 no. units which were permitted as part of the parent permission were agreed to be omitted via Compliance, due to site and boundary constraints. The proposed provision of 2 no. new residential units would result in a total of 371 no. units, the same number as originally permitted. We further highlight that the units previously omitted consisted of a 2-bed duplex over 1-bed apartment. The 2 no. new units are both 2-bed Ground Floor Universally Accessible units. Therefore, the proposed amendments will achieve a net gain in relation to the provision of accessible residential units within the scheme.

5.0 STATEMENT OF CONSISTENCY

This Statement includes a list of the various statutory and strategic policy documents considered as part of the proposed development and demonstrates the extent of consistency with national and regional planning policy framework, the relevant Section 28 Ministerial Guidelines and the pertinent Development Plan (i.e. the *Limerick City and County Development Plan 2022-2028*).

We highlight that the principle of residential development at the subject location has been examined as part of the parent permission (ABP Ref. 311588-21) and will therefore not be revisited as part of this assessment.

5.1 *National Planning Framework (Ireland 2040 – Our Plan) (2018).*

The *National Planning Framework* (NPF) sets out a range of Policies and Objectives which support the provision of housing within the five cities of Ireland and the promotion of compact growth and density. Compact growth is listed as one of the ten National Strategic Outcomes (NSOs) within the NPF.

Section 1.3 of the NPF states that achieving effective density and consolidation in strategic areas is a top priority.

The following National Policy Objectives within the NPF support the provision of housing at appropriate locations:

National Policy Objective 2a

“A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs.”

National Policy Objective 3a

“Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.”

National Policy Objective 3b

“Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.”

The subject application inherently complies with the *National Planning Framework* through the provision of additional residential units at a location which has been deemed suitable for new residential development within the Limerick City suburbs.

5.2 *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024).*

The *Sustainable Residential Development and Compact Density Guidelines for Planning Authorities* (2024) (referred to as the Compact Density Guidelines herein) sets out the relevant car and cycle parking standards for any new residential development.

We highlight that SPPR 1 does not apply to the proposed development as no change is proposed in relation to the footprint and location of permitted Apartment Blocks A and B. SPPR 2 relates solely to houses, and therefore does not apply to the proposed development, which seeks amendments to the permitted Apartment Blocks A and B.

The subject site can best be categorised as an ‘accessible location’, due to its proximity to Limerick City Centre. SPPR 3 outlines that the maximum number of car parking spaces permissible for accessible locations is 1.5 spaces per dwelling.

Section 5.3.4 of the Guidelines states the following in relation to lower car parking provision:

*“Car parking ratios should be reduced at all urban locations, and should be minimised, **substantially reduced or wholly eliminated at locations that have good access to urban services and to public transport.**”* [Our Emphasis.]

The subject Application does not include any additional car parking provision. It is determined that the 2 no. new residential units will be served by the previously permitted car parking provision. This reduced car parking provision is in line with Section 5.3.4 of the Guidelines, as the proposed amendments will not result in any increase in car parking provision.

SPPR 4 outlines that a minimum standard of 1 no. bicycle parking space per bedroom should be applied for all new residential developments, as well as visitor parking.

The subject application seeks the provision of 4 no. additional bicycle parking spaces. We highlight that cycle parking provision included as part of the parent Planning Application was deemed acceptable, and as the number of total units proposed will match that originally permitted, we contend that the provision of 4 no. additional cycle parking spaces is appropriate.

Please refer to the enclosed ‘Architecture Design Statement’ and Architectural Drawing Pack prepared by Reddy Architecture + Urbanism for full details.

5.3 Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2023).

The Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2023) (referred to as the Apartment Guidelines herein) seek to promote high density apartment development on appropriately zoned land in appropriate locations, in line with the above referenced NPF overarching policies in relation to encouraging residential development within existing urban settlements.

When applying the locational criteria set out within the Apartment Guidelines, the proposed development is considered to fall within the ‘Intermediate Urban Location’ category. For such locations, Section 2.4 of the Apartment Guidelines states:

*“Such locations are generally suitable for smaller-scale (will vary subject to location), higher density development that may wholly comprise apartments, or alternatively, medium-high density residential development of any scale that includes apartments to some extent (will also vary, but broadly **>45 dwellings per hectare net**) ...”* [Our Emphasis.]

The proposed development will provide an overall residential density of 47uph, which is in line with the recommendations set out in Section 2.4 of the Apartment Guidelines. We highlight that because of the omission of 2 no. units via compliance with Conditions, as set out in section 3.1 of this Report, the provision of 2 no. new units will not result in any changes to the permitted residential density.

The Apartment Guidelines also provide design standards in relation to:

- Apartment mix;
- Apartment sizes;
- Dual aspect ratios;
- Floor-to-ceiling heights;
- Apartment to stair/lift ratios;
- Internal space standards, including storage spaces;
- Amenity spaces including balconies and patios; and
- Room dimensions.

Compliance with the above noted design provisions has been achieved in this development. Full details in this regard are provided in the enclosed 'Housing Quality Assessment' and the 'Architectural Design Statement', prepared by Reddy Architecture + Urbanism. The proposed amendments have been assessed within the context of the wider permitted scheme, and a summary of compliance with the Specific Planning Policy Requirements (SPPRs) outlined in the Apartment Guidelines is presented in Table 5.1 below.

SPPR No.	Compliance with SPPR
SPPR 1	No new one-bedroom units are proposed as part of the proposed amendment Application. Both new proposed units are 2-bedroom (4-person) units. Therefore, the provisions of SPPR 1 do not apply.
SPPR 2	The proposed development does not constitute a building refurbishment scheme and the site is larger than 0.25Ha, therefore the provisions of SPPR 2 do not apply.
SPPR 3	The floor area of the 2 no. new proposed 2-bedroom (4-person units) both measure in excess of 73sqm, the minimum floor area requirement for this unit type, in accordance with SPPR 3.
SPPR 4	Both new units will be dual-aspect, in accordance with SPPR 4.
SPPR 5	The permitted floor-to-ceiling height at each storey of Apartment Blocks A and B is 3.3m. No changes are proposed in respect of the built form of these blocks, including the floor-to-ceiling height. The provisions of SPPR 5 therefore do not apply.
SPPR 6	The proposed new units will result in 9 no. residential units at Ground Floor Level of Apartment Block A, which has 2 no. stair and lift cores. The proposed amendments therefore accord with SPPR 6.
SPPR 7	The proposed development does not constitute shared accommodation/co-living, therefore the provisions of SPPR 7 do not apply.

Table 5.1: Summary of compliance with the Specific Planning Policy Requirements (SPPRs) set out in *The Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2023)*.

Further to this, the Apartment Guidelines states that private amenity space of 7sqm and communal open space of 7sqm are required for 2-bedroom (4-person) apartments. A terrace measuring c. 16.0sqm and 16.2sqm respectively have been provided for each new residential unit. We highlight that the public and communal open space permitted as part of the parent permission was in excess of the minimum requirements, therefore, since the number of proposed residential units will be the same as that originally permitted (371 no.), we contend that the existing provision will be capable of supporting the new units.

Please refer to the enclosed 'Housing Quality Assessment' and 'Architectural Design Statement' prepared by Reddy Architecture + Urbanism for further details.

5.4 *The Urban Development and Building Heights Guidelines for Planning Authorities (2018)*

The Urban Development and Building Heights Guidelines for Planning Authorities (the Building Heights Guidelines) were published in 2018, providing a guide for the provision of taller buildings in urban areas.

No changes to building heights are proposed as part of the subject Application, therefore the provisions of *The Urban Development and Building Heights Guidelines for Planning Authorities (2018)* do not apply.

5.5 *Urban Design Manual: A Best Practice Guide (2009).*

It is understood that the intention is to prepare a replacement Urban Design Manual document to reflect the Compact Settlement Guidelines (2024), as detailed in Section 5.2 above. However, this document has not been published to date and the Development Plan refers to the *Urban Design Manual: A Best Practice Guide (2009)* (referred to as the Urban Design Manual herein).

The Urban Design Manual presents 12 no. criteria that should be used to facilitate assessment of planning applications and should, therefore, be used as a guide to steer best design practice for residential proposals. The figure below illustrates how the 12 no. criteria have been sequenced in a logical order and the order of the criteria reflects the prioritisation and processes that should be adopted: i.e. not moving onto matters of detail until the important structural decisions have been taken. The 12 no. criteria are subdivided into three groups: Neighbourhood; Site; and Home, respectively, reflecting the sequence of spatial scales and order of priorities that is followed in a good design process.



Figure 5.1: Urban Design Criteria. (Source: *Urban Design Manual: A Best Practice Guide* (2009).)

These 12 no. criteria were incorporated into the design of the parent application, as detailed in the 'Planning Statement of Consistency' and 'Design Report' submitted as part of ABP Reg. Ref. 311588-21.

We contend that the proposed amendments do not constitute such a material deviation from the permitted scheme to necessitate a re-examination of the Urban Design Criteria, as set out in the *Urban Design Manual: A Best Practice Guide*.

Please refer to the documentation submitted as part of the parent permission (ABP Reg. Ref. 311588-21) for full details of compliance with this policy document.

5.6 Part V and the Planning and Development Act 2000: Guidelines (2017).

This Guidance document advocates consideration of Part V issues at the earliest point possible. The subject proposal is entirely consistent with the 2017 Guidelines, which states:

"The acquisition of units on the site of the development is the recommended option in order to advance the aim of achieving a social mix in new developments. This option should be pursued by the local authority from its earliest engagement with the developer, with a view to acquiring houses which meet its social housing requirements for that area/site."

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).

Please refer to the documentation submitted as part of the parent permission for full details regarding Part V provision.

5.7 *Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities, (2009).*

The *Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities, (2009)* was published to guide compliance with the *Birds Directive, 1979* and the *Habitats Directive, 1992*.

A full suite of ecological and environmental assessments were provided as part of the parent Planning Application, including a 'Natura Impact Assessment' and 'Environmental Impact Assessment Report'. An 'Appropriate Assessment Screening' is provided in Section 7.0 of this report. This 'Appropriate Assessment Screening' is to be read in conjunction with the documentation provided as part of the parent Planning Application.

5.8 *Regional Spatial and Economic Strategy for the Southern Region 2019-2031.*

The *Regional Spatial and Economic Strategy for the Southern Region 2019-2031* (RSES) is a strategic plan and investment framework to shape future development and to better manage regional planning and economic development throughout the Southern Region.

The RSES includes a Metropolitan Area Strategic Plan (MASP) for the Limerick-Shannon area. This MASP notes the following in relation to Limerick City:

"Limerick City is the largest urban centre in Ireland's Mid-West and the country's third largest city. The NPF supports ambitious growth targets to enable Limerick City to grow by at least 50% to 2040 and to achieve its potential to become a city of scale."

'Compact sustainable growth' and 'accelerate housing delivery' are listed as two of the 11 no. guiding principles within this MASP, which are described as follows:

"Compact sustainable growth – The development of brownfield and infill lands to achieve a target of at least 50% of all new homes within or contiguous to the existing built up area in Limerick City and 30% in Shannon and other settlements."

"Accelerate housing delivery – Activate strategic residential development areas such as Mungret and support the steady supply of sites to accelerate housing supply, supported by better services and public transport."

The proposed development accords with the above noted guiding principles, along with a range of other policies and objectives, which support the provision of new housing at appropriate locations, as detailed within the *Regional Spatial and Economic Strategy for the Southern Region 2019-2031* in respect of the Limerick-Shannon Metropolitan Area Strategic Plan.

5.9 Limerick Development Plan 2022-2028.

The *Limerick Development Plan 2022-2028* (referred to as the Development Plan herein) was adopted in June 2022 and is the relevant planning policy document for the subject Application.

The Core Strategy for the Development Plan highlights the importance of the provision of housing, forecasting that between 2022 and 2028, there will be an additional 11,442 no. households in Limerick City and suburbs.

Section 2.4 of the Development Plan highlights the strategic importance of population growth of Limerick City and suburbs for both Limerick County and the wider Limerick Shannon Metropolitan Area.

Section 2.4

*"The Plan aims to facilitate the sustainable growth of Limerick City and Suburbs (in Limerick), Mungret and Annacotty in line with the NPF and RSES, which supports ambitious growth targets to **enable Limerick City and Suburbs (in Limerick), Mungret and Annacotty to grow by at least 50% by 2040** and to achieve its potential to become a City of scale. This area forms part of the Limerick Shannon Metropolitan Area in the RSES, coming within the scope of the Limerick Shannon Metropolitan Area Strategic Plan (MASP) and as such is a priority growth area within the strategy's policy framework. The MASP recognises that for the Metropolitan Area to prosper and develop in a sustainable manner, Limerick City must be the primary driver of economic and population growth in the Southern Region, so that it can compete effectively for investment and jobs."* [Our Emphasis.]

The Core Strategy places an emphasis on the importance of compact growth:

Policy CS P2 - Compact Growth

"It is a policy of the Council to support the compact growth of Limerick City Metropolitan Area, towns and villages by prioritising housing and employment development in locations within and contiguous to existing City and town footprints where it can be served by public transport and walking and cycling networks, to ensure that development proceeds sustainably and at an appropriate scale, density and sequence, in line with the Core Strategy Table 2.7."

We contend that the proposed amendments to ABP Reg. Ref. 311588-21 aligns with the Core Strategy of the Development Plan through the provision of additional residential units within an established residential area of the Limerick inner suburbs, within a permitted new residential development.

5.9.1 Land Use Zoning

Within the Development Plan, the subject site is zoned 'New Residential', which has the following Objective:

"To provide for new residential development in tandem with the provision of social and physical infrastructure".

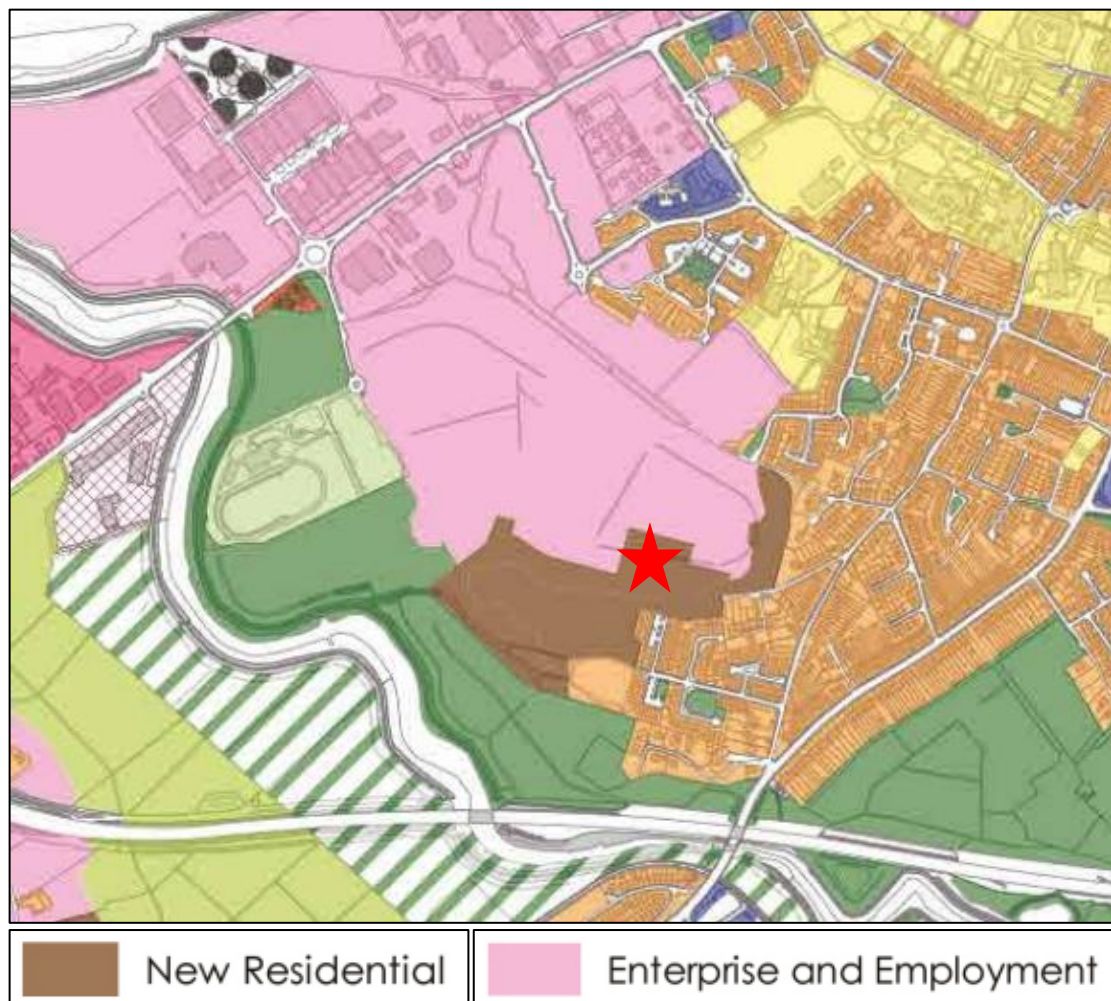


Figure 5.2: Extract from 'Map 3: Limerick City and Suburbs (in Limerick), including Mungret and Annacotty - Zoning Map' as provided in Appendix 2 of the *Limerick Development Plan 2022-2028*, showing the area of proposed work zoned 'New Residential'.

We highlight that the principle of new residential development at the subject site has been established through the parent permission (ABP Reg. Ref. 311588-21).

5.9.2 Settlement Capacity Audit

Volume 2a of the Development Plan identifies the subject site as part of Site No. 133 within the Settlement Capacity Audit. The subject site includes lands within both 'Density Zone 2: Intermediate Urban Locations/Transport Corridors' and 'Density Zone 3: Suburban Edge'. The portion of the subject site for which amendments are sought as part of the subject Application are located within 'Density Zone 2', which requires a minimum net density of 45+ dwellings per hectare.

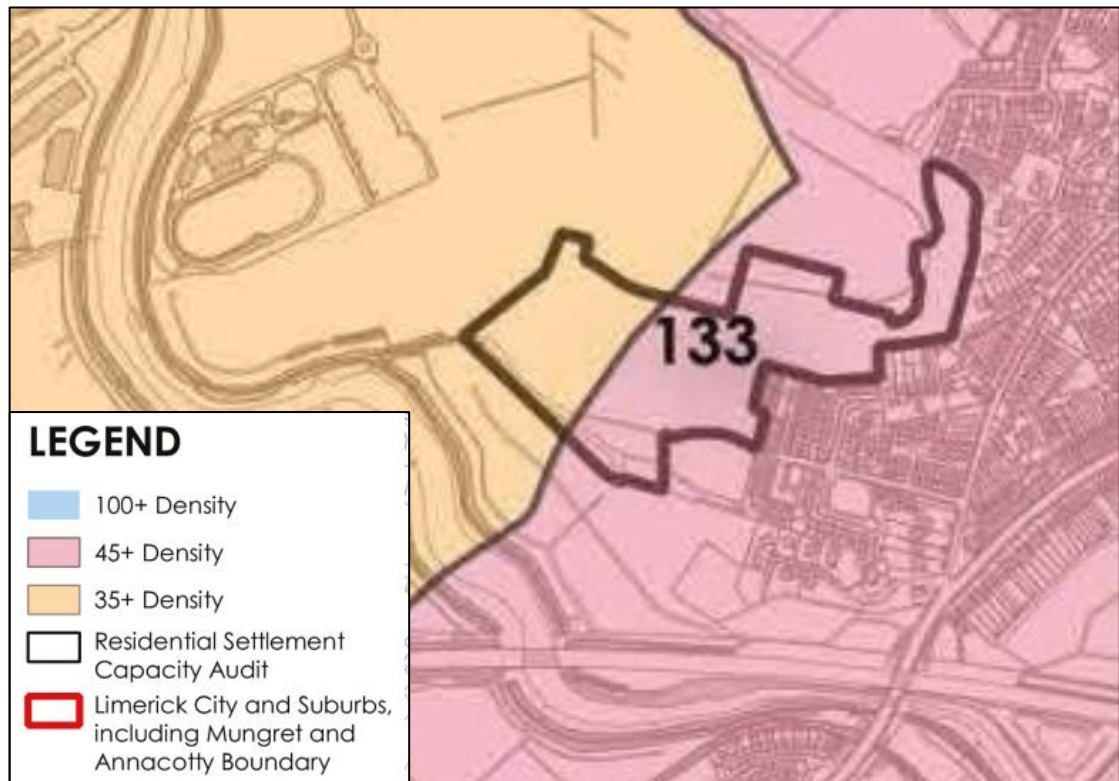


Figure 5.3: Extract from 'Map 4: Limerick City and Suburbs (in Limerick), including Mungret and Annacotty - Density Map' as provided in Volume 2a of the Limerick Development Plan 2022-2028.

Map 1 contained within Volume 2a of the Development Plan highlights the subject site as being a Tier 2 site for new residential development as part of the Settlement Capacity Audit. The site is also identified as infill development.

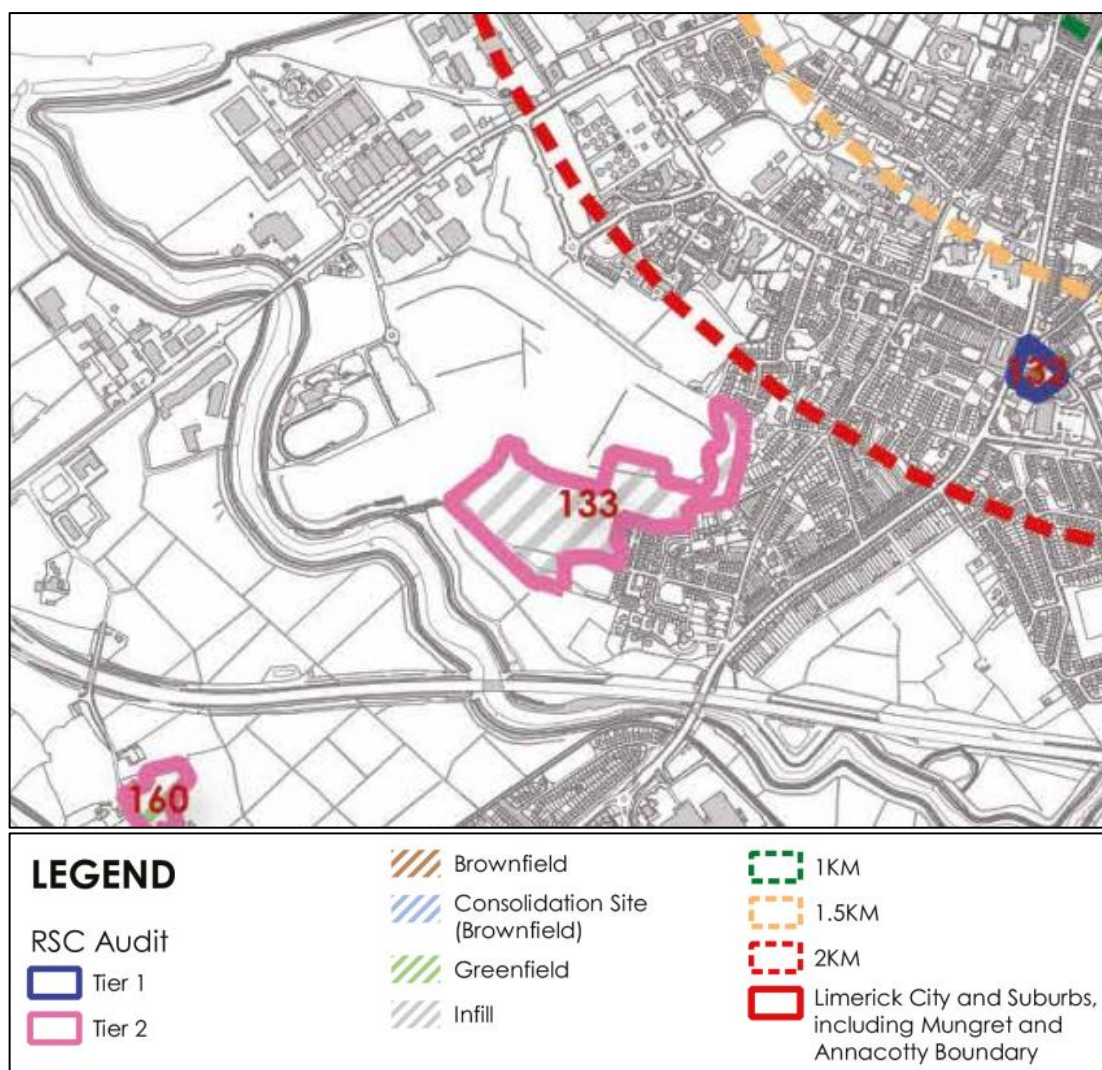


Figure 5.4: Extract from 'Map 1: Limerick City and Suburbs (in Limerick), Mungret and Annacotty - Residential Settlement Capacity Map' as provided in Volume 2a of the Limerick Development Plan 2022-2028.

We highlight that a density of 47 no. units per hectare for the subject site was considered appropriate by An Bord Pleanála in their assessment of the parent permission (ABP Reg. Ref. 311588-21). As set out previously in this Report, 2 no. units were required to be omitted via Condition, therefore the provision of the 2 no. new proposed units sought as part of the subject amendment Application will result in the same residential density as originally permitted.

5.9.3 Development Management

The primary development management standards relating to the subject amendments are dealt with under the *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)* and *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2023)*, dealt with in Sections 5.2 and 5.3 above respectively.

Minimum Apartment Floor Areas

Table DM 4 set out in the Development Plan outlines a requirement for 73sqm floor area for 2-bedroom (4-person) units.

The proposed new units will measure c. 80.8sqm and c. 99.9sqm respectively, in excess of the minimum requirements.

Dual Aspect

Section 11.4.1.2 states the following in relation to dual aspect:

Section 11.4.1.2

“There shall generally be a minimum of 50% dual aspect apartments in a single scheme.”

The 2 no. new residential units will both be dual aspect, in accordance with Section 11.4.1.2.

Internal Storage

Section 11.4.1.4 outlines the requirements for internal storage within apartments:

Section 11.4.1.4 - Internal Storage and External Storage

“Internal storage standards for apartments shall comply with the following:

- Minimum Storage Space Requirements: – One Bedroom: 3m² – Two Bedroom (3 person): 5m² – Two Bedroom (4 person): 6 sq. m. – Three Bedroom: 9m² .*
- Storage should be additional to kitchen presses and bedroom furniture.*
- Hot press/boiler space will not count as general storage.*
- No individual storage room should exceed 3.5m² and shall be provided within the apartment unit.*

In addition to the minimum apartment storage requirements, apartment schemes should provide external storage for bulky items outside individual units (i.e. at ground or basement level). These storage units should provide for accessible and secure storage, allocated to each individual apartment unit. Each storage room shall provide appropriate electric points for the purpose of charging electric bikes/scooters”

Both new units include the provision of 7sqm of internal storage space, in excess if the minimum requirements. We highlight that secure storage for bicycles is provided at Ground Floor Level of both apartment blocks, as detailed in Section 4.2.2 above.

Refuse Storage

Section 11.3.4 of the Development Plan outlines the following requirements for refuse storage:

Section 11.3.4 - Refuse Storage and Services

"Adequate refuse storage, recycling and composting areas shall be catered for within all residential developments. In the case of communal refuse storage provision, the collection point for refuse should be accessible both to the external collector and to the resident and be secured against illegal dumping by non-residents. In the case of individual houses, the applicant shall clearly show within a planning application the proposed location and design of bin storage to serve each dwelling."

As detailed in Section 4.2.2 above, the location of the permitted bin storage is proposed to be relocated within the permitted service area between Apartment Block A and Apartment Block B. This will result in an increase of the bin storage area from 35.1sqm to 63sqm. The general location of these bin stores has therefore been deemed appropriate as part of the parent permission and the proposed increase in size of the bin stores will ensure that the waste produced by the two new residential units will be able to be accommodated at this location.

Please refer to Dwg. No. GPL-02-AB-XXX-DR-RAU-AR-3360 'Proposed Bin Store Plans, Sections & Elevations', prepared by Reddy Architecture + Urbanism for full details regarding the proposed design of the bin stores.

Separation Distances

Section 11.4.1.3 of the Development Plan states the following in respect of separation distances between blocks:

11.4.1.3 - Separation between Blocks

"All residential development, particularly apartment developments and those over three storeys high, shall provide for acceptable separation distances between blocks to avoid negative effects such as excessive overlooking, overbearing and overshadowing effects and provide quality living environment for future occupiers."

It is not proposed to alter the location, orientation, or built form of the permitted apartment blocks, therefore there will be no change to the permitted separation distance between these blocks.

Section 11.4.2.1 of the Development Plan outlines the following requirements for separation distances between opposing residential units:

11.4.2.1 - Separation Distances between Residential Units

"As per NPF National Policy Objective NPO13, in the interest of residential amenity the following applies:

- An appropriate separation distance between directly opposing rear windows at first floor level in the case of detached, semi-detached and terraced units;*
- Any residential development proposal exceeding three or more storeys shall demonstrate adequate separation distances having regard to occupier's amenity including privacy, sunlight and daylight. Each development proposal will be assessed on a case-by-case basis and should not be seen as a precedent for future development in the area;*

- *Minimum 3m separation distance to the side of dwellings for the full length of detached, semi-detached or end of terrace dwellings, equally divided between the two adjacent dwellings.” [Our Emphasis.]*

We highlight that no changes are proposed to the built form of Apartment Blocks A and B. Therefore, as the separation of the residential units located immediately above the proposed new units and the nearest permitted residential units were deemed sufficient as part of the parent permission (ABP Reg. Ref. 311588-21), the location of the two new units would also be considered acceptable.

The privacy of the occupiers of these 2 no. new residential units has been considered in the design of the proposed amendments, with revisions to the façade, to reduce the quantum of windows, and provision of private terraces.

An ‘Assessment of Sunlight and Daylight’ was prepared by ARC Architectural Consultants Limited as part of the parent Application. Whilst this assessment did not assess the previously permitted residential amenity areas, we highlight that all other units at Ground Floor Level of Apartment Blocks A and B achieved Average Daylight Factors well above the minimum requirements as set out in the BRE Guide. We highlight that the new proposed residential units are dual-aspect, providing maximum levels of daylight and sunlight. We further highlight that the most comparable units within the development, those located at Ground Floor Level at the south-east and south-west corners of Apartment Block B, identified as L0-B09 and L0-B10 within the ‘Assessment of Daylight and Sunlight’ achieved ADFs of 8.15% and 6.30% respectively, well above the minimum requirements. Therefore, we contend that the 2 no. new proposed residential units will also achieve daylight and sunlight access in excess of the minimum standards.

Please refer to the documentation submitted as part of the subject Application and parent Application for full details regarding sunlight and daylight compliance.

Open Space

Section 11.3.6 of the Development Plan sets out the following in respect of Open Space requirements:

Section 11.3.6 - Open Space Requirements

“In accordance with the 2009 Sustainable Residential Guidelines and any subsequent guidelines, at a minimum, 15% of the gross greenfield sites should be provided as multifunctional open space in new residential developments easily accessible to all, encouraging active and passive use for persons of all abilities regardless of mobility and/or age;”

As set out in this Report, 2 no. previously permitted residential units within the subject site were required to be removed via Condition, therefore the provision of the 2 no. new proposed units would result in the same number of residential units as originally were Granted Permission under ABP Reg. Ref. 311588-21. Therefore, the originally permitted quantum of public open space is considered acceptable for the total number of residential units which will result from the subject Application. Compliance with private open space requirements is outlined in Section 5.3 above.

Sustainable Urban Drainage Systems (SuDS)

The Development Plan supports the provision of Sustainable Urban Drainage Systems (SuDS) within new developments, as set out in Objective CAF 06 in particular.

We highlight that the subject application seeks proposed amendments to a permitted new residential development. We highlight that the proposed development includes only very minor changes to landscaping, including the amendment of a previously permitted residential amenity terrace to provide 2 no. private residential terraces, and the relocation of cycle parking stands within the areas immediately surrounding Apartment Blocks A and B.

The provision of SuDS was considered acceptable by An Bord Pleanála within their assessment of the parent permission and the proposed development will not result in any material alteration to this arrangement. Therefore, we contend that the provision of SuDS within this portion of the subject site is considered acceptable.

Please refer to the 'Civil Engineering Memorandum' prepared by Punch Consulting Engineers for full details.

Drainage and Water Supply

The Development Plan sets out a range of Policies and Objectives relating to drainage and water supply.

We highlight that the proposed development seeks proposed amendments to a permitted residential development, with no changes proposed to the built form of the permitted apartment blocks. Drainage and water supply provision will be as per the parent permission. The 'Engineering Memorandum' prepared by Punch Consulting Engineers as part of the subject Application confirms that the previously permitted drainage and water supply provision will be capable of accommodating the proposed 2 no. new units.

Please refer to the parent permission (ABP Reg. Ref. 311588-21) and the 'Engineering Memorandum' prepared by Punch Consulting Engineers as part of the subject Application for full details regarding drainage and water supply.

Car and Bicycle Parking

The development Plan sets out Policies and Objectives relating the car and bicycle parking provision.

The car and cycle parking provisions set out in the Development Plan have since been superseded by the *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities* (2024), outlined in Section 5.2 above. Please refer to this Section for compliance with the relevant car and bicycle parking standards.

Transport and Mobility

The Development Plan includes a range of Policies and Objectives relating to transport and mobility. We highlight that no changes are proposed to the previously permitted site access or internal roads within the site.

Please refer to the parent permission (ABP Reg. Ref. 311588-21) for full details regarding transport and mobility.

6.0 FLOOD RISK

A comprehensive 'Flood Risk Assessment' was prepared by RPS Group in respect of the subject site as part of the parent planning Application (ABP Reg. Ref. 311588-21). A number of mitigation measures were included as part of the parent planning Application, including that all roads will be built up to approximately 5.0m OD and that all finished floor levels within the development will be constructed to a minimum of 5.30m OD which provides over 1m freeboard to the property above the 0.50% AEP breach flood level, thus providing a very high standard of protection.

This 'Flood Risk Assessment' concluded as follows:

"Based on the proposed mitigation measures, consideration of the designated zoning and the proposed urban design, each of criteria in the Development Management Justification Test was shown to be satisfied. Therefore it was concluded that the proposed development complies with the requirements of the Development Management Justification Test and hence is compliant with 'The Planning System and Flood Risk Management Guidelines'."

The parent Planning Application was assessed with regard to this 'Flood Risk Assessment' and was deemed acceptable.

We contend that the nature and scale of the proposed amendments, which occur within the as permitted building envelope and footprint, do not necessitate a new Flood Risk Assessment to be prepared.

7.0 APPROPRIATE ASSESSMENT SCREENING

The subject site was screened for Appropriate Assessment. The site is not located within or directly adjacent to any Natura 2000 area.

The subject site is, however, located in proximity to 2 no. Natura 2000 sites (The Lower River Shannon SAC and the River Shannon and River Fergus Estuaries SPA).

A 'Stage 2 Natura Impact Statement' was prepared by Ecology Ireland, following a 'Stage 1 Appropriate Assessment Screening', as part of the parent Application. The parent Planning Application was assessed with regard to this Statement and was deemed acceptable.

We contend that the nature and scale of the proposed amendments do not necessitate a new Appropriate Assessment Screening to be conducted, given that the amendments principally occur within the building envelope and footprint of a previously permitted development.

8.0 CONCLUSION

The subject application seeks amendments to Apartment Blocks A and B and the areas between and immediately surrounding these blocks, permitted as part of ABP Reg. Ref. 311588-21, on lands at the former Greenpark Racecourse, Dock Road, Limerick City.

The proposed amendments primarily comprise the change of use of 2 no. permitted residential amenity areas at Ground Floor Level of Apartment Block A to provide 2 no. 2-bedroom (4-person) Universally Accessible units, as well as the provision of an ESB substation and switch room, with associated minor internal and elevational amendments to Apartment Blocks A and B and minor site layout changes within the area between and immediately surrounding these blocks.

The proposed amendments will provide much needed additional Universally Accessible residential units, which have been specifically requested by Clúid, the Approved Housing Body which will be managing Apartment Block A, and will provide an ESB substation, which has been requested by the Electricity Supply Board themselves.

We contend that the proposed amendments, as set out in this Report, are in accordance with all relevant national and local planning policy.



John Gannon
Director
Tom Phillips + Associates