



An
Bord
Pleanála

Case Reference:

ABP-310233-21

Planning and Development (Housing) and Residential Tenancies Act 2016

Notice of Pre-Application Consultation Opinion

Proposed Development: 287 no. residential units (139 no. houses, 148 no. apartments), creche and associated site works.

Lands at the former Greenpark, Dock Road, Limerick City.

An Bord Pleanála has considered the issues raised in the pre-application consultation process and, having regard to the consultation meeting and the submission of the planning authority, is of the opinion that the documents submitted with the request to enter into consultations require further consideration and amendment to constitute a reasonable basis for an application for strategic housing development.

An Bord Pleanála considers that the following issues need to be addressed in the documents submitted that could result in them constituting a reasonable basis for an application for strategic housing development.

1. Residential Density and Housing Mix

Further consideration / justification of the documents as they relate to the issues of residential density and housing mix, with regard to the following matters:

- The status of the Racecourse lands as one of the largest remaining undeveloped land banks in Limerick City.

- The strategic importance of the proposed development site and the Racecourse lands for the development of the Limerick Metropolitan area, in the context of national planning policy to achieve compact urban areas and, specifically, National Planning Objectives NPO 2a, NPO 3b, NPO 7, NPO8 regarding the development of Ireland's existing cities; NPO 5 regarding the development of cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity and NPO 35 to increase residential density in settlements, as set out in the National Planning Framework.
- National planning policy on residential development as set out in the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities and the Design Standards for New Apartments Guidelines for Planning Authorities.
- Table 2.4 of the Core Strategy of the Limerick City Development Plan 2010-2016 (as varied), which identifies the Racecourse lands (36 ha) as having capacity for 1,188 no. residential units, also the objectives for the Racecourse lands set out in Development Plan Chapter 14.
- The accessible location of the proposed development site close to Limerick City Centre, Mary Immaculate College, Dooradoyle District Centre and employment zones such as the Raheen Industrial Estate and University Hospital Limerick campus.
- The availability of existing and proposed roads, pedestrian, cycle and public transport infrastructure in the vicinity of the site, in the context of the draft Limerick Shannon Metropolitan Area Transport Strategy (LSMATS).

The further consideration of this issue may require an amendment to the documents and/or design rationale submitted.

2. Design and Layout of Development

Further consideration/justification of the documents as they relate to the design and layout of residential development. The prospective applicant should satisfy themselves that the proposed design and layout provide the optimal urban design and architectural solution for this site and are of sufficient quality to ensure that the

proposed development makes a positive contribution to the character of the area over the long term. In this regard, the submitted documents should allow for particular consideration of the following matters:

- The development shall comprise separate Character Areas, with an integrated hierarchy of public open spaces at accessible, well overlooked locations throughout the site. The public open spaces shall address specific functions such as active / passive open spaces and play areas. The Character Areas shall include a consistent approach to (i) the design and finish of houses / apartment buildings; (ii) roads and footpaths layout materials and finishes; (iii) hard and soft landscaping and tree retention (where proposed); (iv) biodiversity enhancement measures; (v) relevant SuDS measures.
- Details of the proposed development shall be provided in the context of any other current proposals for adjacent developments within the Racecourse lands, such as the nursing home to the south east of the development site, also the development permitted to the north east of the proposed development site under Reg. Ref. 17/1190 ABP-302015-18.
- The associated provision of a public lighting scheme, to the satisfaction of the planning authority.

The further consideration of these issues may require an amendment to the documents and/or design proposals submitted relating to design and layout of the proposed development.

3. Roads, Pedestrian and Cycle Connectivity

Further consideration of the documents as they relate to road / pedestrian / cycle connectivity to South Circular Road via adjacent residential areas to the north and east of the site, to include the capacity of existing roads, pedestrian and cycle infrastructure at these locations, as well as the potential cumulative impacts of the development of adjacent sites within the overall Racecourse lands in the context of the proposed Masterplan and any current proposals to develop adjacent sites within the Masterplan area, also the development permitted Reg. Ref. 17/1190 ABP-

302015-18. The prospective applicant is also advised to consider connectivity to adjoining development sites within the Masterplan lands and to potential future connectivity to the lands owned by Limerick City and County Council to the south of the development site. The following matters should also be taken into consideration:

- The draft Limerick Shannon Metropolitan Area Transport Strategy, including proposals for roads, pedestrian, cycle and public transport infrastructure in the area.
- The prospective applicant is advised to liaise with the planning authority regarding connectivity to Council lands to the south of the development site. They should at a minimum not preclude any future connections to adjoining lands.
- Existing and proposed roads levels with regard to the SSFRA.

The further consideration of these issues may require an amendment to the documents and/or design proposals submitted relating to design and layout of the proposed development.

Furthermore, Pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that, in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission:

1. Where the applicant considers that the proposed strategic housing development would materially contravene the relevant Development Plan or Local Area Plan, other than in relation to the zoning of the land, a statement indicating the plan objective(s) concerned and why permission should, nonetheless, be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act 2000. Notices published pursuant to Section 8(1)(a) of the Act of 2016 and Article 292 (1) of the Regulations of 2017, shall refer to any such statement in the prescribed format

2. A site plan showing the layout of the proposed development in relation to the various zonings that apply to the site.²
3. A Masterplan for the overall Racecourse lands in the ownership of the prospective applicant, which is to consider the strategic importance of the lands for the development of Limerick Metropolitan Area and is to address matters including land use zoning, residential density, housing mix, provision of a neighbourhood centre, childcare provision, details of the capacity of roads / pedestrian / cycle / public transport infrastructure and connectivity to adjoining areas, IW foul and watermain infrastructure, surface water drainage and flood risk, landscaping and biodiversity enhancement measures.
4. A detailed phasing plan for the proposed development, in the context of the Masterplan for the overall Racecourse lands.
5. Housing Quality Assessment with regard to the standards set out in the Sustainable Urban Housing Design Standards for New Apartments Guidelines for Planning Authorities.
6. A building life cycle report shall be submitted in accordance with section 6.3 of the Sustainable Urban housing: Design Standards for New Apartments (2020). The report should have regard to the long-term management and maintenance of the proposed development.
7. A site layout plan showing which, if any, areas are to be taken in charge by the planning authority.
8. A Sunlight/Daylight/Overshadowing analysis showing an acceptable level of residential amenity for future occupiers and existing residents, which includes details on the standards achieved within the proposed residential units, in

private and shared open space, and in public areas within the development and in adjacent properties. This report should address the full extent of requirements of BRE209/BS2011, as applicable.

9. Existing and proposed ground levels across the site. Detailed cross sections indicating proposed FFL's, boundary treatments, road levels, open space levels, SUDS measures, etc. relative to each other and relative to adjacent lands and structures. Also topographical details and cross sections to indicate the relationship between the development and any adjacent watercourses and wetlands with regard to the protection of riparian zones.

10. Traffic and Transport Impact Assessment, to be prepared in consultation with Limerick City and County Council and to include consideration of (i) mobility management and public transport currently available in the area; (ii) potential impacts on relevant local road junctions; (iii) cumulative impacts with traffic associated with nearby schools and residential areas.

11. Rationale for proposed parking provision with regard to development plan parking standards and to the 'Sustainable Urban Housing Design Standards for New Apartments – Guidelines for Planning Authorities' (2020). The proposed car and cycle parking provision should include areas designated for parking or drop off purposes associated with the childcare facility.

12. Stage I Road Safety Audit

13. A noise assessment, which addresses the potential noise impact from the N18 and N69 on the proposed development and clearly outlines proposed noise mitigation measures, if so required. The noise assessment should be carried out by a suitably qualified acoustic engineer.

14. Landscape and Visual Impact Assessment with photomontages and CGIs of the proposed development, to include, *inter alia*, consideration of visual impacts on adjacent residential areas and on any sensitive or designated views / prospects in the vicinity, with regard to relevant development plan landscape designations

15. Site Specific Flood Risk Assessment to include (i) details of proposals for the drainage of the site and the attenuation of surface water runoff and (ii) Justification Test with regard to the presence of Flood Zone A at the site. The issue of existing flood defences in the area is to be considered with regard to the relevant guidance provided in the Planning System and Flood Risk Management Guidelines for Planning Authorities (including the associated Technical Appendices).

16. Comprehensive landscaping scheme for the entire site to include (i) tree Survey, Arboricultural Report and Impact Assessment, to provide a detailed survey of any trees and hedgerows at the development site and assessment of the quality and quantity of the specimens to be removed, along with measures to protect trees and hedgerows to be retained during construction; (ii) rationale for proposed public open space provision for the housing development, to include an open space hierarchy, details of play areas and detailed layouts for the public open spaces; (iii) additional landscaping details including details of hard and soft landscaping, play equipment (if provided), boundary treatments, delineation of public and communal open space provision, pedestrian and cycle facilities, public lighting, car and cycle parking areas and refuse storage areas.

17. Childcare proposals to detail the number of children that the proposed creche will cater for.

18. A draft Construction Waste Management Plan, draft Construction and Environmental Management Plan and a draft Operational Waste Management Plan.

19. Irish Water has advised that applicant that its records indicate there is significant existing water and wastewater infrastructure traversing the site. Due to the size and significance of these IW assets a diversion(s) will not be feasible. Additionally, the proposed wastewater network and associated connection to the public network will be carried out at a significant depth and in excess of 6m. The prospective applicant is advised to engage with the IW Diversions section prior to lodging any application for the development site.

20. AA screening report or Natura Impact Statement.

21. The information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018, unless it is proposed to submit an EIAR at application stage.

Also, pursuant to article 285(5)(a) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is informed that the following authorities should be notified in the event of the making of an application arising from this notification in accordance with section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended:

1. Irish Water
2. Transport Infrastructure Ireland
3. National Transport Authority
4. Limerick County Childcare Committees
5. Health and Safety Authority

PLEASE NOTE:

Under section 6(9) of the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended, neither the holding of a consultation under section 6, nor the forming of an opinion under that section, shall prejudice the performance by the Board, or the planning authority or authorities in whose area the proposed strategic housing development would be situated, of any other of their respective functions under the Planning and Development Acts 2000 to 2020 or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.

Tom Rabbette

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July, 2021