



An
Bord
Pleanála

Record of Meeting ABP-310233-21

Case Reference / Description	287 no. residential units (139 no. houses, 148 no. apartments), creche and associated site works. Lands at the former Greenpark, Dock Road, Limerick City.		
Case Type	Section 5 Pre-Application Consultation Request		
Date:	24 th June 2021	Start Time	10:00 am
Location	Remotely via Microsoft Teams	End Time	12:00 pm
Chairperson	Tom Rabbette	Executive Officer	Helen Keane

Representing An Bord Pleanála:

Tom Rabbette, Assistant Director of Planning
Sarah Moran, Senior Planning Inspector
Helen Keane, Executive Officer

Representing Planning Authority

Dara McGuigan, Senior Executive Officer
Donogh O'Donoghue, Senior Executive Planner
Jennifer McNulty, Executive Planner
Robert Gallagher, Senior Engineer
Sinead Kennedy, Senior Executive Engineer
Seamus O'Reilly, Senior Executive Engineer
Tony Carmody, Senior Executive Technician

Representing Prospective Applicant:

John Gannon, Tom Phillips Associates
Lizzie Donnelly, Tom Phillips Associates
John Keane, Voyage Properties

Jane McMahon, Voyage Properties
Mike Freaney, Reddy Architecture + Urbanism
Rob Keane, Reddy Architecture + Urbanism
Donal Gallery, PUNCH Consulting Engineers
Aidan O’Connell, PUNCH Consulting Engineers
Andrew Jackson, RPS Consulting
Gavin Fennessy, Ecology Ireland
Tim O’Shea, GDG Consulting Engineers

Introduction

The representatives of An Bord Pleanála (ABP) welcomed the prospective applicant, Planning Authority (PA) and introductions were made. The procedural matters relating to the meeting were as follows:

- The written record will be placed on the pre-application consultation file and will be made public once the Opinion has issued,
- ABP received a submission from the PA on 14th June 2021 providing the records of consultations held pursuant to section 247 and its written opinion of considerations related to proper planning and sustainable development that may have a bearing on ABP’s decision,
- The consultation meeting will not involve a merits-based assessment of the proposed development,
- The meeting will focus on key site-specific issues at strategic overview level, and whether the documents submitted require further consideration and/or amendment in order to constitute a reasonable basis for an application.
- Key considerations will be examined in the context of the statutory development plan for the area and section 28 Ministerial Guidelines where relevant,
- A reminder that neither the holding of a consultation or the forming of an opinion shall prejudice ABP or the PA concerned in relation to any other of their respective functions under the Planning Acts or any other enactments and cannot be relied upon in the formal planning process or in legal proceedings.

The ABP representatives acknowledged the letter dated 14th May 2021 formally requesting pre-application consultations with ABP. Prospective applicant advised of the need to comply with definition of SHD as set out in the Act of 2016, in relation to thresholds of development. It was also noted that the Inspector dealing with the pre-application consultation request would be different to who would deal with the application when it was submitted. Recording of the meeting is prohibited.

Agenda

- 1. Residential Density and Planning Context**
- 2. Design and Layout of Development**
- 3. Roads, Traffic and Transportation Issues. Pedestrian and cycle connections**
- 4. Flood Risk**
- 5. Ecology**
- 6. Any Other Matters**

1. Residential Density and Planning Context

ABP Comments:

- Extensive planning history on the proposed development site
- The site has been vacant since the racecourse closed in 1999
- Planning authority have raised issues regarding the density and scope of the proposed development due to the strategic importance of the site for the development of Limerick City
- The prospective applicant is advised to address the strategic importance of the site in any application
- The prospective applicant is advised to provide details of adjacent public transport services at application stage
- The publication of the draft Limerick City Development Plan is imminent. ABP will have regard to the draft development plan but it will not have any statutory status if it is not in force when an application is brought forward
- The prospective applicant is advised to consider any draft Strategic Flood Risk Assessment of the draft Development Plan in relation to flood risk at the proposed site
- The ABP opinion is based on the documentation submitted with the Section 5 Consultation Request only
- The prospective applicant is advised to give detailed consideration to the Masterplan for the overall racecourse lands in progressing the subject application, including matters relating to land use zoning, road capacity, childcare provision, connectivity to adjoining areas, flood risk, etc.

Planning Authority's Comments:

- The site has a strategic location in Limerick City, within the old city boundary and within 1 km of Mary Immaculate College and 1.5 km to city centre
- Density of 41 units per hectare is on the low side given its core location, the density should be higher.
- The draft Limerick Shannon Metropolitan Area Transport Strategy (LSMATS) is currently being finalised, the 1st public consultation has taken place and the 2nd public consultation is imminent. It is hoped to be finalised by the end of the year.
- The site will be very well served by public transport and is adjacent to 3 bus corridors
- There will be cycle routes along each bus corridor
- There are detailed proposals for cycle routes on South Circular Road to the east of the development site
- There will be a considerable amount of increased connectivity around the development site, as provided for in the draft LSMATS
- The new draft development plan is being released on 26th June 2021
- The CFRAMS study that is included in pre-application documentation currently stands

Prospective Applicant's Comments:

- Acknowledges the planning authority's comments in relation to the strategic location of the site

- The masterplan is an accurate, on the ground plan that shows the reality of the site
- Reluctant to base an application on anything that hasn't been delivered yet with regard to the draft LSMATS
- 47 units per hectare can be justified in the context of national planning policy
- The site is well located and pivotal to the growth of Limerick
- The site is 2 km from the city and not 1.5 km as stated by the planning authority
- The proximity to public transport can only be addressed based on existing provision, not future projections
- Have not seen the draft development plan yet
- Will consider creche numbers
- There will be an EIAR submitted at application stage

2. Design and Layout of Development

ABP Comments:

- The prospective applicant is to consider the development in the context of existing residential areas to the north and east of the site
- Also the adjoining proposed development in the context of the Masterplan for the racecourse lands, e.g. the proposed nursing home and neighbourhood centre
- Further details / modifications to the proposed areas of open space and landscaping are advised
- The layout is dominated by roads and parking at present. The prospective applicant is advised to give more detailed consideration to shared spaces, parking and landscaping around the public open spaces, also the functionality and materiality of the spaces. Biodiversity enhancement measures could also be considered.
- Prospective applicant to consider potential impacts on adjacent residential amenities, including sunlight and daylight analysis and visual impacts with regard to changes in levels adjoining existing residential properties
- Prospective applicant to consider the relationship with adjoining lands / sites

Planning Authority's Comments:

- Connection back into the city centre is one of the big issues

Prospective Applicant's Comments:

- The connection into the city centre is outside the scope of this application

3. Roads, Traffic and Transportation Issues. Pedestrian and cycle connections.

ABP Comments:

- The prospective applicant is advised to provide as much clarity as possible regarding roads and traffic capacity in adjoining residential areas, including Log na gCapall and the pedestrian / cycle capacity of Greenpark Avenue
- Also to consider roads / pedestrian / cycle capacity with regard to the development of the overall Masterplan lands

- Need for detailed consideration of the Log na gCapall access in the context of the proposed access to the nursing home on the Masterplan lands
- The prospective applicant is advised to liaise with the planning authority regarding connectivity to Council lands to the south of the development site
- Development should not preclude any future connections to adjoining lands,

Planning Authority's Comments:

- The planning authority would require a traffic assessment for a new connection from the Masterplan lands to Alandale to the north of the development site and outside the site boundary
- Access to the Masterplan lands would be shared between Alandale and the Dock Road
- The planning authority has concerns regarding access onto the South Circular Road but favours the proposed pedestrian / cycle access at Greenpark Avenue
- Emergency access to Log na gCapall is fine if bollarded and controlled
- Pedestrian and cycle facilities will be improved upon on South Circular Road
- There will be some improvements on Greenpark Avenue but they will mostly be on South Circular Road
- Agrees with the applicant that Greenpark Avenue is not heavily trafficked
- Prospective applicant is to ensure connectivity to the Council owned lands to the south of the proposed development site
- The planning authority requests that the Masterplan roads layout includes this connectivity

Prospective Applicant's Comments:

- The Masterplan deals with concerns regarding issue of Alandale road links
- The impact on roads capacity at Log na gCapall is negligible
- Greenpark Avenue is not heavily trafficked
- There is little issue with cycle and pedestrian access from the proposed development
- There is potential in the proposed development to ensure connectivity from PA owned lands to the south of the proposed development site
- The Masterplan can indicate connections to the Council owned lands to the south
- The prospective applicant does not intend to preclude future connections to adjoining lands
- Will liaise further with the planning authority on this matter
- The apartment building is located at the southern end of the site
- The prospective applicant will consider the landscaping details and layout for the open space at the southern end of the site in the event that the nursing home is not delivered
- Provision of 14.5% open space in proposed development

4. Flood Risk

ABP Comments:

- The site is adjacent to the Ballynaclough River, which drains to the Shannon, with associated flood zones
- The prospective applicant is to ensure clarity regarding roads levels and finished floor levels (FFLs) throughout the application, including cross sections, relationship with adjoining residential areas, etc.
- Prospective applicant to consider implications of raising roads levels and FFLS for visual impacts, landscaping and connectivity across the site
- Provide clarity on ground works at application stage

Planning Authority's Comments:

- The flood defenses currently in place for this part of Limerick are for agricultural lands and are not constructed for development.
- Some of the lands in the proposed development are located in flood zone A and B
- Recommends proposed development has higher finished floor levels
- Recommend provision of an emergency response access road from the Dock Road as there is currently only one emergency access to South Circular Road via Log na gCapall
- Would like to take in charge a road in the future that is not subject to flooding
- Prospective applicant advised to consider raising the level of the road between the development site and Dock Road

Prospective Applicant's Comments:

- Have completed full Flood Risk Assessment to show how Masterplan lands can be developed and a full Flood Risk Assessment of the proposed application
- If a breach occurs, all properties in the proposed development would be at least 1 m above flood level
- Surface water is being attenuated
- The proposed development puts no reliance on the existing flood defenses, as per the Flood Risk Guidelines

5. Ecology

ABP Comments:

- There are critical issues at the proposed development site including connectivity to designated sites
- Prospective applicant is to address all potential ecological impacts

Planning Authority's Comments:

- No further comments

Prospective Applicant's Comments:

- Proximity of site to several Special Area of Conservation (SAC)
- There is considerable biodiversity gain in the amount of trees (570 trees) to be planted as part of the development

- The proposed development site is currently dominated by scrub
- Can provide further details of ecological benefits
- Sought to embed the ecological approach from the beginning and this has informed the Masterplan

6. Any Other Matters

ABP Comments:

- Report from Irish Water raised questions over existing IW infrastructure at the site, suggesting that it cannot be relocated
- Prospective applicant is advised to liaise further with Irish Water, proposed development may need some amendments in response to the issues raised
- The Flood Risk Assessment should provide clarity regarding potential impacts for 3rd parties

Planning Authority's Comments:

- No further comments

Prospective Applicant's Comments:

- In discussions with Irish Water, will liaise with diversions team of IW
- Do not currently see any Material Contravention issues

- **Conclusion**

The representatives of ABP emphasised the following:

- There should be no delay in making the planning application once the public notice has been published
- Sample notices, application form and procedures are available on the ABP website
- Irish Water would like prospective applicants to contact Irish Water at cdsdesignqa@water.ie **between the Pre-Application Consultation and Application stages**, to confirm details of their proposed development and their proposed design.
- The email address to which applicants should send their **applications** to Irish Water as a prescribed body is spatialplanning@water.ie

Tom Rabbette
Assistant Director of Planning
July, 2021