



An
Bord
Pleanála

**S. 6(7) of Planning and
Development (Housing)
and Residential Tenancies
Act 2016**

**Inspector's Report on
Recommended Opinion
ABP-307185-20**

Strategic Housing Development	332 no. residential units, creche and associated site works.
Location	Ballykeefe, Raheen, Co. Limerick.
Planning Authority	Limerick County Council
Prospective Applicant	DW Raheen Developments Limited
Date of Consultation Meeting	24 th September 2020
Date of Site Inspection	20 th September 2020
Inspector	Sarah Moran

1.0 Introduction

- 1.1. Having regard to the consultation that has taken place in relation to the proposed development and also having regard to the submissions from the planning authority, the purpose of this report is to form a recommended opinion as to whether the documentation submitted with the consultation request under section 5(5) of the Planning and Development (Housing) and Residential Tenancies Act 2016 - (i) constitutes a reasonable basis for an application under section 4, or (ii) requires further consideration and amendment in order to constitute a reasonable basis for an application under section 4.

2.0 Site Location and Description

- 2.1. The development site is located on the southern side of Limerick city, c. 4 km south west of the city centre and south of the N18/N69 ring road. It comprises undeveloped lands with a frontage to the R510, which connects the N69 with residential areas further to the south and east. The site comprises several agricultural fields with well established field boundaries. There is a band of mature trees along the site frontage to the R510. Permission was previously granted for residential development at the site and a roundabout has been constructed on the R510 to facilitate site access. The permitted development was otherwise never constructed. There is currently limited pedestrian and cycle infrastructure in the area. The site is bound by existing low density, suburban residential development to the south, east and west and by further undeveloped lands to the north (blue line site boundary). There is also a disused railway line to the north of the site, some distance from the northern site boundary. The lands at the site are relatively flat. There is a lowlying wetland at the northern end of the site, which is identified as within Flood Zone A in the submitted SSFRA. That area drains via two culverts to the local surface water system and ultimately to the River Shannon. This part of the site is identified as an area of coastal flood risk in OPW PFRA flood mapping but is protected by existing flood defences in the area (the SSFRA identifies a residual risk of overtopping and embankment failure).

3.0 Proposed Strategic Housing Development

3.1. The proposed development involves the following key points:

Site Area	c. 9.1 ha (9.95 ha including flood zone)
No. of Residential Units	332 (221 houses, 70 apts, 41 BTR apts)
Other Development	Creche (761.75 sq.m.), 79 no. childcare places 2 no. ESB substations
Height	2 – 5 storeys
Residential Density	36.5 units/ha or 37.3 units/ha excluding creche
Amenity Space	16,343 sq.m. public open space 16.6% of total site area
Roads	Single vehicular access from existing roundabout on R510 Cycle lane along R510 frontage Pedestrian connection at eastern site boundary
Cycle Parking	70 no. cycle parking spaces
Car Parking	485 no. car parking spaces, based on Limerick County Development Plan Table 10.5 car parking requirements Houses - 253 no. shared /visitor spaces in addition to in curtilage spaces Apts - 172 no. spaces including 55.5 no. visitor spaces (c. 1.7 spaces/unit) 26 spaces for creche
Part V	Transfer of 33 no. units on site to LCCC
Site Services	New connection to public water supply and foul sewer. IW CoF submitted.

	Surface water drainage to attenuation tanks, to discharge to public sewer.
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3.4. The proposed housing mix is as follows:

UNIT TYPE	NO. OF UNITS	%
Houses		
2 bed house	26	8%
3 bed house	156	47%
4 bed house	32	10%
5 bed house	7	2%
Total Houses	221	
Apartments		
1 bed apt	3	< 1%
2 bed apt	56	17%
4 bed apt	11	3%
Total Apts	70	
BTR Apartments		
BTR studio apt	8	2%
1 bed BTR apt	8	2%
2 bed BTR apt	25	8%
Total BTR Apts	41	
TOTAL	332	

3.5. The northern site boundary is close to the Lower River Shannon SAC and the River Shannon and River Fergus Estuaries SPA and the site has surface water links to these European sites. A NIS is submitted. The development is sub threshold for EIAR. No EIA screening has been submitted.

3.6. Most of the site within the red line site boundary is zoned for new residential development under the Southern Environs Local Area Plan 2011-2017 (as

extended). Adjoining lands to the east, also owned by the applicant (blue line site boundary), are zoned Open Space and Recreational under the current LAP. The applicant has submitted an Indicative Masterplan, including the adjoining lands, which indicates potential future residential development on the Open Space and Recreational zoned lands. The applicant submits that the site layout is designed to allow for future development on the adjoining lands to the east if they are zoned for development in the future.

4.0 Planning History

4.1. Reg. Ref. 09/756 and 15/7003

- 4.1.1. Permission granted under 09/756 for 111 houses, creche and all associated site works at the development site. Under Reg. Ref. 15/7003, permission was refused to extend 09/756 for the following reason:

The planning authority consider that there have been significant changes in the development objectives in the development plan since the date of the grant of planning permission 09/756, including Policy WS.8 Flood Protection and WS.9 Flood Risk of the Limerick City Development Plan 2010-2016 and having regard to the Flood Risk Management Guidelines for Planning Authorities 2009, that the development would no longer be consistent with the proper planning and sustainable development of the area.

4.2. Reg. Ref. 08/6009 and 09/6004

- 4.2.1. Relating to adjoining lands to the northeast, which are zoned open space under the LAP. Part VIII applications for a neighbourhood park. This development has not taken place.

5.0 National and Local Planning Policy

5.1. Section 28 Ministerial Guidelines

- 5.1.1. Having considered the nature of the proposal, the receiving environment, the documentation on file, including the submissions from the planning authority, I am of the opinion that the directly relevant section 28 Ministerial Guidelines are:

- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (including the associated Urban Design Manual)
- Design Standards for New Apartments Guidelines for Planning Authorities
- Design Manual for Urban Roads and Streets (DMURS)
- The Planning System and Flood Risk Management Guidelines for Planning Authorities (including the associated Technical Appendices)
- Childcare Facilities Guidelines for Planning Authorities
- Urban Development and Building Heights Guidelines for Planning Authorities

5.2. Southern Environs LAP 2011-2017 extended to May 2021

5.2.1. The LAP sets out the following housing policies:

Policy HP1: Housing

It is the policy of the Council to provide appropriately zoned lands to cater for the sustainable growth of the Southern Environs area ensuring all residents can enjoy safe and accessible environments. Quality shall underpin all new development by creating and maintaining a sense of place and local distinctiveness in established and new development areas.

Policy HP2: Compliance with Limerick County Development Plan

It is the policy of the Council to ensure all proposals for housing development shall comply with the policies, objectives and Development Management Standards of the Limerick County Development Plan, 2010-2016 and the objectives outlined below.

5.2.2. The site is generally zoned as a Residential Development Area where the following objectives apply:

Objective HO1: New Housing

It is an objective of the Council, on serviced land that is zoned 'Residential Development Area', to facilitate sustainable residential development in accordance with the principles and guidelines of the 'Sustainable Residential Development in Urban Areas' (May 2009), the accompanying Urban Design Manual, and the Development Management Standards contained in the Limerick County Development Plan, 2010-2016.

Objective ZD 2 Residential Development Area

It is the objective of the Council to;

- a) conserve and enhance the quality and character of the wider area;*
- b) protect residential amenity and allow for development appropriate to the sustainable growth of the area;*
- c) promote the provision of community and other facilities such as childcare as an integral part of residential areas subject to overall residential amenity;*
- d) provide for a range of house types and sizes to meet the various housing needs of existing and future residents;*
- e) facilitate the expansion of the area in a balanced and sustainable way;*
- f) have regard to appropriate form and densities as set out in the DEHLG document 'Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities' (May 2009).*

- 5.2.3. Lands to the east of the site have the zoning objective Open Space and Recreational, where the following objectives apply:

Objective C1: Protection of lands designated for Open Space

It is the objective of the Council to:

- a) Reserve the land for the provision of neighbourhood parks in Ballykeeffe and Mungret to ensure that the current and future open space needs of the Southern Environs residents are met.*
- b) Protect existing open space, by not permitting development, which would result in the loss of or reduce the recreational value of open space, including public and private playing fields, allotments and informal open space, unless a replacement site is provided which is equivalent in terms of accessibility, size and quality.*
- c) Protect designated semi-natural open space areas from development, for the enjoyment of the community and flood protection.*
- d) Retain existing areas of amenity open space, such as woodlands, archaeological monuments and visual landmarks throughout housing areas.*

Objective ZD 3 Open Space and Recreation

It is the objective of the Council to;

a) protect, improve and provide for recreation, open space and amenity provision through the preservation of green space to be dedicated to active or passive recreation, i.e. sports fields, playgrounds, local areas of play (LAP)s and local equipped areas of play (LEAPs);

b) protect, improve and maintain public open space;

c) preserve private open space; and

d) provide recreational and community facilities.

6.0 Forming of the Opinion

6.1. Pursuant to section 6(7) of the Act of 2016, regard is had in the forming of the opinion to the documentation submitted by the prospective applicant; the planning authority submissions and the discussions which took place during the tripartite consultation meeting. I shall provide a brief detail on each of these elements hereunder.

6.2. Documentation Submitted

6.2.1. The prospective applicant has submitted information pursuant to section 5(5)(a) of the Planning & Development (Housing) and Residential Tenancies Act 2016 and Article 285 of the Planning and Development (Strategic Housing Development) Regulations 2017. This information included, inter alia, the following:

Completed application form; Planning Report and Statement of Consistency; S247 Pre Application Consultation Report; Architecture Report and Urban Design Statement; CGIs; Compliance Schedules Houses and Apartments; Architecture Drawings; Site Layout Map; Site Location Map; Masterplan Drawing; Part V Confirmation Letter; Civil Engineering Report; Construction Waste Management Plan; Engineering Drawings; Road Safety Audit Stage 1; Confirmation of Feasibility Statement from Irish Water; Flood Risk Assessment; AA Screening and NIS Report

6.2.2. Section 5(5)(b) of the Act of 2016 requires the submission of a statement that, in the prospective applicant's opinion, the proposal is consistent with both the relevant objectives of the development plan or local area plan concerned, and the relevant

guidelines issued by the Minister under section 28 of the Act of 2000. These statements have been submitted, as required.

6.2.3. I have reviewed and considered all of the above-mentioned documents and drawings.

6.3. Planning Authority Submission

6.3.1. In compliance with section 6(4)(b) of the 2016 Act the planning authority for the area in which the proposed development is located, Limerick City and County Council (LCCC), submitted a copy of their section 247 consultations with the prospective applicant and also their opinion in relation to the proposal. These were received by An Bord Pleanála on the 25th June 2020. The planning authority's 'opinion' included the following matters:

- The principle of residential development is accepted at this location and is in accordance with zoning Objective H01: Residential Development Area.
- The application is for the entirety of the lands zoned Residential at Ballykeefe. Objective C1(a) of the Southern Environs LAP seeks to 'Reserve the land for the provision of neighbourhood parks in Ballykeefe and Mungret to ensure that the current and future open space needs of the Southern Environs residents are met.' Therefore the development should integrate satisfactorily with the existing open space zoning. The applicant shall provide a Masterplan for all the lands in their ownership reflecting the current zonings in the Southern Environs LAP and a proposal for same. The applicants have indicated their intention at pre-planning meetings to seek the rezoning of the adjoining open space zoning to residential in the future.
- The development site is 0.5 km from the nearest Neighbourhood Centre at Racefield Centre, Father Russell Road and 0.85 km from the nearest primary school. The nearest District Centre at Dooradoyle is 1.5 km from the site. Raheen Industrial Estate (major employment zone) is 1.55 km from the site. The PA considers that the development fits the criteria between a 'Less Accessible' urban location and an 'Intermediate' urban location as per the Apartment Guidelines. The PA considers that the proposed residential density is in accordance with current Southern Environs LAP and national planning policy.

- The PA considers that the proposed building heights are substantially in compliance with the Building Height Guidelines.
- Of particular importance is the impact of the development (in particular the 5 storey element) on the existing dwellings along the southern site boundary.
- The PA considers that the development is substantially in compliance with the Apartment Guidelines. The design is high quality and the unit mix complies with the Guidelines.
- The majority of the proposed public open space is in the north western corner of the site, which is within the flood zone. The proposed open space provision in the flood zone is not considered acceptable by the PA and a revised proposal should be considered by the applicant. The applicant shall also consider consistency with LAP objectives for the adjoining open space zoned lands and LAP Table 7 'Open Space Hierarchy within Residential Estates'. A key concern is that the applicant demonstrates that sufficient useable open space is available.
- The submitted NIS is noted. LCCC Heritage Officer comment (10th June 2020). Possibility of flooding in the northern part of the site to be addressed, this area is within Flood Zone A. The NIS does not consider potential groundwater links between the development site and the River Shannon and Natura sites. Need for on-site habitats to be mapped. Need to consider specific species mentioned in LAP objective EH10, e.g. otters, possibility of presence at the development site. No EIA screening submitted. Treatment of cumulative effects in the NIS is cursory, e.g. no reference to nearby Part VIII Mungret Links Road.
- LCCC Operations and Maintenance Section comment (15th June 2020). No TTIA submitted. Development will have a direct impact on the R510 Ballykeefe Roundabout, R510 Quinns Cross Roundabout and N69 Dock Road Interchange. Inadequate traffic analysis provided to date. The Road Safety Audit is incomplete. Surface water drainage - require details on hydraulic modelling and access to attenuation pond. No public lighting design submitted, detailed requirements set out.
- LCCC Housing Development Directorate comment on Part V (15th June 2020), Letter of Agreement provided.

- LCCC Physical Development Directorate comment on flood risk (15th June 2020). No current objection to the development in relation to the principle of flood risk.
- LCCC Physical Development Directorate (Environment) comment (15th June 2020). A noise assessment should be prepared outlining the potential impact of road noise from the N18 and R510 on the development, with proposals for mitigation measures where necessary. The noise assessment should be carried out by a suitably qualified acoustic engineer.
- LCCC Physical Development Directorate (Transport and Travel) comment (15th June 2020). With the potential for the development of the disused rail line to the east boundary of the site as a sustainable travel link, an area of ground should be retained to provide direct access to the rail line from within the development. This area should be located in a convenient, overlooked location. Requirement for provision of satisfactory pedestrian and cycle links to the R510 roundabout.
- LCCC Archaeologist comment (15th June 2020). Archaeological monitoring required.

6.4. Irish Water Submission

6.4.1. The following points are noted:

- Irish Water has issued a Confirmation of Feasibility for 400 residential units at the development site.
- The development is a standard connection requiring no network or treatment plant upgrades for water or wastewater by the customer or Irish Water.

6.5. Consultation Meeting

6.5.1. A section 5 Consultation meeting took place via Microsoft Teams on the 24th September 2020. Representatives of the prospective applicant, the planning authority and An Bord Pleanála were in attendance. An agenda was issued by An Bord Pleanála prior to the meeting.

6.5.2. The main topics raised for discussion at the tripartite meeting were based on the Agenda that issued in advanced and contained the following issues:

1. Consistency with relevant zoning objectives under the Southern Environs Local Area Plan 2011-2017 as extended.

2. Design and layout of development including provision of public open space and communal facilities
3. Flood risk
4. Appropriate Assessment
5. Roads, Traffic and Transportation Issues. Pedestrian and cycle connections.
6. Any other matters.

6.5.3. In relation to consistency with relevant zoning objectives under the Southern Environs LAP, ABP representatives sought further elaboration / discussion on:

- Potential rezoning of 'open space' zoned lands adjoining the site under the review of the current LAP. The submitted Indicative Masterplan, which includes development on adjoining lands owned by the applicant that are zoned for open space and recreation, is noted. The applicant is advised that ABP will consider the application under the LAP that is in force when the application is lodged, not any draft LAP.
- Strategic importance of the 'Open Space and Recreational' zoned lands adjoining the site with regard to LAP policy.
- The applicant will need to consider the compatibility of the development and proposed residential density with the Development Plan core strategy objectives regarding density, population distribution, etc., as well as relevant national planning policy, i.e. the Sustainable Residential Development in Urban Areas and the National Planning Framework.
- The site appears to have limited transport accessibility but is located close to enterprise units / employment centres such as the hospital and business park and to local services, schools and amenities. The applicant is to address this in the application, also any proposed new public transport connections under Limerick Shannon Metropolitan Area Transport Strategy (LSMATS).
- ABP notes that the PA is satisfied with the proposed density.

6.5.4. In relation to the design and layout of development including provision of public open space and communal facilities, ABP representatives sought further elaboration / discussion on:

- Applicant to provide a detailed rationale for the proposed design and layout in the application.
- Applicant to address issues raised in PA Opinion regarding the design and layout, ABP would have similar issues
- Applicant to address issues raised in the PA Opinion regarding landscaping
- Applicant to look at character areas within the development, with regard to design / finish of residential units, landscaping, etc. Also distribution, hierarchy and functionality of public open spaces within the development with regard to relevant LAP policy.
- Applicant to have regard to pedestrian/cycleways in proposed development as layout appears to be roads dominated. Also layout and design of shared car parking areas.
- Development should provide strong urban edges to the wider area, creating edge/presence on regional road and to open space zoned lands
- Applicant to avoid development in the flood zone at the northern end of the site.
- Application to provide an integrated approach to roads, pedestrian / cycle facilities, parking, landscaping, SuDs, tree retention, etc.
- Pedestrian / cycle access indicated to southeast, ensure included in redline and provide details of who will carry works out.
- Submit rationale in relation to car parking provision, have regard to national policy and apartment guidelines in conjunction with Development Plan and transport etc. in area.
- Address noise and potential impacts from the R510 and the motorway to the north of the site.
- The applicant will need to provide clarity regarding any proposed works outside the red line site boundary, i.e. ownership of lands and who will carry out works
- The PA will have to make case for any special contribution that they require having regard to planning gain.

- Applicant to show how pedestrians/cyclists are accommodated and how this has led to the proposed layout.
- Good quality design required having regard to housing mix, PA may have specific objectives in Development Plan.
- Applicant to consider potential impacts on visual and residential amenities

6.5.5. In relation to flood risk, ABP representatives sought further elaboration / discussion on:

- Flood zone in northwest corner of proposed site. Proposed public open space located in this area.
- Site Specific Flood Risk Assessment submitted
- Some surface water attenuation infrastructure located in flood zone A which might be problematic
- Guidance from PA in relation to flood defences, address in application with regard to the provisions of the Planning System and Flood Risk Management Guidelines for Planning Authorities (including the associated Technical Appendices)
- Applicant to have regard to legal issues that have arisen in relation to attenuation and other infrastructure in flood zones adjoining residential development in other areas
- PA and applicant should engage in further discussions to resolve issues prior to lodging application

6.5.6. In relation to Appropriate Assessment, ABP representatives sought further elaboration / discussion on:

- Designated sites at the River Shannon to the north of the development site
- PA Opinion raised issues regarding potential ground water connections to designated sites
- Address any indirect impacts on designated sites
- Address source-pathway-receptor connections to designed sites, also potential ex-situ issues.

- Have regard to AA issues on other SHD applications in Limerick, consider NPWS comments on same.
- Department guidance refers to 15 km radius for direct and indirect impacts on designated sites
- ABP will not carry out AA as part of pre-application

6.5.7. In relation to roads and traffic and transportation issues. pedestrian and cycle connections, ABP representatives sought further elaboration / discussion on:

- Roads layout and DMURS
- Pedestrian and cycle connections to adjoining lands and in the wider area.
- Be clear in documentation regarding pedestrian/cycle connections from proposed site into adjoining site, i.e. ownership of lands and who is going to carry out works. Should be within red line site boundary if possible.
- ABP have refused SHD applications where sections of public infrastructure are missing, show all connections in application
- Traffic and transportation impacts with regard to mobility management and existing / proposed public transport infrastructure. Applicant can consider infrastructure proposed under LSMATS but this has indicative status only at present. ABP can only have regard to plans and policies that are in place when the application is lodged.
- Roads and pedestrian/cycle provision already discussed
- Address transport issues raised in PA Opinion including impacts on specific local junctions, also car parking.
- Road infrastructure connecting to roundabout carried out prior to DMURS, address DMURS in application.

6.5.8. In relation to any other matters, ABP representatives sought further elaboration / discussion on:

- EIA screening not addressed in pre-application, address in application
- If pedestrian / cycle connections are being included in application, this may bring the proposed development over the EIAR threshold

- Schedule 7a information to be included in application if not submitting EIAR
- Ensure clear and consistent details in all documents and drawings in application from all agencies

6.5.9. Both the prospective applicant and the planning authority were given an opportunity to comment and respond to the issues raised by the representatives of ABP. Those comments and responses are recorded in the 'Record of Meeting ABP-307185-20' which is on file. I have fully considered the responses and comments of the prospective applicant and planning authority in preparing the Recommended Opinion hereunder.

7.0 Conclusion and Recommendation

7.1. Based on the entirety of the information before me, it would appear that the proposed development falls within the definition of Strategic Housing Development, as set out in section 3 of the Planning and Development (Housing) and Residential Tenancies Act 2016.

7.2. I have examined all of the information and submissions before me including the documentation submitted by the prospective applicant, the submissions of the planning authority and the discussions which took place at the tripartite meeting. I have had regard to both national policy, via the section 28 Ministerial Guidelines, and local policy, via the statutory development plan for the area.

Having regard to all of the above, I recommend that further consideration and/or possible amendment of the documents submitted are required at application stage in respect of the following elements:

- **Residential Density**
- **Design and Layout of Residential Development**

details of which are set out in the Recommended Opinion below.

7.3. Having regard to the above, I recommend that the Board serve a notice on the prospective applicant, pursuant to Section 6(7)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016, stating that it is of the opinion that the documentation submitted with the consultation request under section 5(5) of the

Act **requires further consideration and amendment in order to constitute a reasonable basis for an application** under section 4 of the Planning and Development (Housing) and Residential Tenancies Act 2016.

- 7.4. I would also recommend that the prospective applicant be notified, pursuant to article 285(5)(b) of the 2017 Regulations, that specified information (as outlined hereunder) be submitted with any application for permission that may follow. I believe the specified information will assist the Board at application stage in its decision making process. I am also recommending that a number of prescribed bodies (as listed hereunder) be notified by the prospective applicant of the making of the application.

8.0 Recommended Opinion

- 8.1. An Bord Pleanála refers to your request pursuant to section 5 of the Planning and Development (Housing) and Residential Tenancies Act 2016. Section 6(7)(a) of the Act provides that the Board shall form an opinion as to whether the documents submitted with the consultation request (i) constitute a reasonable basis for an application under section 4 of the Act, or (ii) require further consideration and amendment in order to constitute a reasonable basis for an application under section 4.
- 8.2. Following consideration of the issues raised during the consultation process, and having regard to the opinion of the planning authority, An Bord Pleanála is of the opinion that the documentation submitted **requires further consideration and amendment to constitute a reasonable basis for an application** for strategic housing development to An Bord Pleanála.
- 8.3. In the opinion of An Bord Pleanála, the following issues need to be addressed in the documents submitted to which section 5(5) of the Act of 2016 relates that could result in them constituting a reasonable basis for an application for strategic housing development:

Residential Density

Further consideration of the documents as they relate to residential density. The prospective applicant is advised to justify the proposed residential density with regard to (i) the Core Strategy of the relevant Development Plan; (ii) national

planning policy including the National Planning Framework and the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities and (iii) the location / accessibility of the site relative to existing / proposed public transport services, district centres, retail facilities, local amenities and employment centres. The further consideration of this issue may require an amendment to the documents and/or design rationale submitted.

Design and Layout of Residential 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:

- (i) The proposed residential layout shall integrate with any Open Space and Recreational zoned lands adjoining the development site. The applicant shall provide a Masterplan for all the lands in their ownership at this location (including lands outside the red line site boundary) reflecting the current zonings in the Southern Environs Local Area Plan 2011-2017 (as extended), or any subsequent Local Area Plan in force when the application is lodged. The Masterplan shall also include consideration of potential links to the disused railway line to the north of the development site, which may be developed as a sustainable travel link.
- (ii) The proposed residential layout shall avoid any areas identified as 'Flood Zone A' in the Site Specific Flood Risk Assessment, including infrastructure such as roads and surface water drainage infrastructure.
- (iii) The proposed residential design and layout shall address the provision of a strong urban edge to the R510. The prospective applicant is also advised to consider potential impacts on the residential amenities of adjacent properties to the immediate south of the development site.
- (iv) 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 materials and finishes; (iii) hard and soft landscaping and tree retention (where proposed); (iv) relevant SuDS measures.

- (v) The layout, distribution, hierarchy and functionality of public open space within the development shall have regard to relevant policies in the Southern Environs Local Area Plan 2011-2017 (as amended);
- (vi) The proposed residential layout shall be consistent with DMURS and shall include satisfactory pedestrian and cycle links to the R510 and, where possible, creation of pedestrian and cycle links to adjoining residential development to the south of the development site. Proposals for any such link on lands outside the red line site boundary shall include details of (i) ownership of the lands in question; (ii) who is going to carry out the proposed works and (iii) a timeframe for completion of same and should be included within the red line site boundary if possible. The applicant shall also provide details of existing pedestrian and cycle connections in the wider area and integration with same.
- (vii) Integrated proposals for hard and soft landscaping; tree retention and enhancement (where considered desirable); SuDS measures and materiality; finishes of roads and car parking areas; design, layout and finishes of houses and apartments and related private open spaces, along with the potential creation of character areas within the development;
- (viii) The associated provision of a public lighting scheme;

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.

- 8.4. 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. Housing Quality Assessment with regard to the standards set out in the Sustainable Urban Housing Design Standards for New Apartments Guidelines for Planning Authorities. The prospective applicant shall also consider relevant policies in the Southern Environs LAP 2011-2017 (as extended) in this matter.
2. Building Lifecycle Report.
3. A site layout plan showing which, if any, areas are to be taken in charge by the planning authority
4. A noise assessment, which addresses the potential noise impact from the N18 and R510 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.
5. 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 including (but not necessarily limited to) the R510 Ballykeefe Roundabout, R510 Quinns Cross Roundabout and N69 Dock Road Interchange.
6. 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' (2018), to include details of parking management for the apartments. The proposed car and cycle parking provision should include areas designated for parking or drop off purposes associated with the childcare facility.
7. Stage I Road Safety Audit
8. Updated SSFRA to include (i) details of proposals for the drainage of the site and the attenuation of surface water runoff; (ii) hydraulic modelling and (iii) 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).

9. Landscape and Visual Impact Assessment with photomontages and CGIs of the proposed development, to include, *inter alia*, consideration of visual impacts on the R510, on the disused railway line to the north of the site, on adjacent residential areas and on any sensitive or designated views / prospects in the vicinity, with regard to relevant development plan landscape designations
 10. A detailed landscaping plan for the site which clearly sets out proposals for hard and soft landscaping including street furniture, where proposed, also a Tree Survey, Arboricultural Impact Assessment and details of measures to protect trees and hedgerows to be retained at the site (where relevant).
 11. Rationale for proposed childcare provision (or lack of same) with regard to, *inter alia*, the 'Childcare Facilities Guidelines for Planning Authorities', circular letter PL 3/2016, and the 'Sustainable Urban Housing Design Standards for New Apartments – Guidelines for Planning Authorities' (2018), to provide details of existing childcare facilities in the area and demand for childcare provision within the proposed scheme. The applicant is advised to consult with the relevant Childcare Committee in relation to this matter prior to the submission of any application.
 12. Ecological Impact Statement to consider the retention and management of hedgerow boundaries at the site.
 13. AA screening report or Natura Impact Statement.
 14. The information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018 should be submitted as a standalone document.
- 8.5. 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:

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

PLEASE NOTE:

Under section 6(9) of the Planning and Development (Housing) and Residential Tenancies Act 2016, 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 2016 or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.

Sarah Moran
Senior Planning Inspector
9th October 2020