



An  
Coimisiún  
Pleanála

## Inspector's Report ABP-322678-25

### Development

PROTECTED STRUCTURE:

Construction of roof extension with all associated site works

### Location

University Hospital Limerick, St.  
Nessan's Road, Dooradoyle, Limerick

### Planning Authority

Limerick City and County Council

### Planning Authority Reg. Ref.

2560249

### Applicant(s)

Health Service Executive (HSE)

### Type of Application

Permission

### Planning Authority Decision

Grant

### Type of Appeal

Third Party

### Appellant(s)

Thomas Loftus & Others

### Observer(s)

### Date of Site Inspection

15<sup>th</sup> August 2025

### Inspector

Clare Clancy

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## **1.0 Site Location and Description**

- 1.1. The appeal site is that of the University Hospital Limerick (UHL) campus which has an overall area of 17.130 ha. It is a Level 4 hospital located in Dooradoyle approximately 3.5 km to the southwest of Limerick city centre. The overall hospital campus lies to the east of St Nessel's Road which is a busy regional route through the city R526. The landholding also includes the HSE West training services and a regional ambulance depot to the west of St Nessel's road.
- 1.2. Established residential housing developments bound the main hospital campus to the north, east and to the south. Gouldavoher estate is located to the west of the existing HSE training centre and High Meadows and Willsbroke housing estates are located to the west and southwest of the existing regional ambulance depot. These areas are low density residential areas characterised mainly by two-storey dwellings. There are other commercial and retail uses within the area. The Crescent shopping centre is located approx. 1.2 km to the northeast of the hospital.
- 1.3. The main access to UHL is off St Nessel's Road roundabout.

## **2.0 Proposed Development**

- 2.1. Permission is sought for a vertical extension of the permitted 'shell' extension to the north of the existing Emergency Department (ED) and Renal Department (RD) P.A. Ref. 23/60506. This permitted development comprises of double basement car parking (levels -01 and -02), two levels of medical floor space (levels 0 and 01) with stairwells, lift access and circulation areas at roof level (level 02).
- 2.2. The proposed development 'Block B' comprises the following:
  - The construction of a 96 no. single-bed acute ward over four floor levels (level 03 to level 06).
  - Associated plant at level 02 and roof level 07.
  - Plant accommodation at fourth storey (level 02), setback plant room at roof level, with basement level below.

- 2.3. The overall height of the building permitted will be increased to 8 stories with an overall height of above ground level approx. 37 m. Due to level changes across the site, the structure will appear as part 8 storey along St. Nesson's Road.
- 2.4. The existing Catholic Church is located adjacent to the main entrance to the hospital campus and is designated a Protected Structure, Hospital Chapel RPS Reg. No. 1649 (Volume 3a Proposed Record of Protected Structures Metropolitan Area).
- 2.5. It is proposed to carry out alterations to the permitted 'shell' granted under P.A. Ref. 23/6050. This comprises of the following:
- The provision of plant/equipment at level 02.
  - Removal of a ventilation well to the basement car park.
  - Relocation of the pedestrian and cyclist access to the basement at level - 01 (from the north elevation to the west elevation).
  - The provision of an external structural support column.
  - Minor alterations to all elevations, including rearrangement of windows and louvre openings and changes to materials and finishes.
- 2.6. It is proposed to provide covered and uncovered bicycle parking spaces at a number of locations within the hospital campus. These are shown on the proposed site layout plan.

Overview Summary of Proposed Development		
Site Area	<ul style="list-style-type: none"> <li>• Appeal Site 0.406 ha (UHL Campus 17.13 ha)</li> </ul>	
Proposed Floor Levels	Level	Use
	07	Plant/ equipment accommodation
	06	Ward
	05	Ward
	04	Ward
	03	Ward & ancillary landscaped space
	02	Plant/ equipment accommodation

<b>Total Floor Area Proposed Ward Extension</b>	<b>Approx. 10,541 m<sup>2</sup></b>	
<b>Floor Levels Permitted P.A. Ref. 23/6050</b>	<b>Level</b>	<b>Use</b>
	02	Roof
	01	Medical floor space
	0	Medical floor space
	-01	Car parking
	-02	Car parking
<b>Total Floor Area P.A. Ref. 23/60506</b>	<b>Approx. 11,262 m<sup>2</sup></b>	
<b>Access</b>	<ul style="list-style-type: none"> <li>• 1 overall existing main access off St Nesson's roundabout.</li> <li>• Ambulance only access from St. Nesson's Road further to south.</li> </ul>	
<b>Water Supply</b>	<ul style="list-style-type: none"> <li>• Existing Uisce Éireann Connection</li> </ul>	
<b>Foul Drainage</b>	<ul style="list-style-type: none"> <li>• Existing Uisce Éireann Connection</li> </ul>	
<b>Surface Water Drainage</b>	<ul style="list-style-type: none"> <li>• Existing foul sewer Connection</li> </ul>	
<b>Finishes</b>	<p>To assimilate with Block A:</p> <p><u>External Walls</u></p> <ul style="list-style-type: none"> <li>• Natural stone cladding</li> <li>• White aluminium rainscreen panelling,</li> <li>• White silicon sealed curtain wall glazing</li> <li>• Render finish</li> </ul> <p><u>Windows</u></p> <ul style="list-style-type: none"> <li>• Powdered coated aluminium.</li> <li>• Tinted coloured glass</li> </ul>	
<b>Parking</b>	<b>Car Parking</b>	<b>Bicycle Parking</b>
	<ul style="list-style-type: none"> <li>• 0 proposed.</li> <li>• 131 no. spaces at basement permitted P.A. Ref. 23/60506 to serve Block B overall</li> </ul>	<ul style="list-style-type: none"> <li>• 32 no. at basement level permitted under P.A. Ref. 23/60506 to serve Block B</li> <li>• 144 no. proposed</li> </ul>

		(covered and secured) • 6 no. biker bunker units across the campus (DWG UHLBLB-KJA-AR)
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The following documents are submitted in support of the application:

- Planning Report
- Environmental Impact Assessment Screening Report
- Screening Report for Appropriate Assessment
- Hydrological & Hydrogeological Assessment Report
- Architects Design Report
- Landscape Report Planning Submission
- Daylight Impact Assessment
- Architectural Visualisation (Computer Generated Images)
- Noise Impact Assessment
- Traffic and Transport Assessment
- Mobility Management Plan
- Stage 1 Road Safety Audit
- Preliminary Construction Management Plan
- Resource and Waste Management Plan
- Operational Waste Management Plan

### 3.0 Planning Authority Decision

#### 3.1. Decision

3.2. By Order dated 20<sup>th</sup> May 2025, Limerick City and County Council (LCCC) decided to grant permission for the proposed development subject to 12 conditions. The following conditions are of note:

- Condition 3 – Hours of operation related to construction works.

- Condition 5 – Pre-development condition regarding final Construction Management Plan and Site-Specific Temporary Traffic Management Plan.
- Condition 6 – Pre-development condition regarding the agreement of a final construction management plan and site specific temporary traffic management plan.
- Condition 7 – Pre-developed condition revised drawings to detail showers and lockers within staff changing rooms.
- Condition 8 – Pre-development condition regarding the revision of the projected modal split for years 1, 3 and 5 in line with Section 3.2.2 of Workplace Travel Plans – Guidance for Local Authorities.
- Condition 9 – The submission of a monitoring report to show compliance with the Mobility Management Plan.
- Condition 10 – Pre-development condition to submit proposals for swift nest boxes.
- Condition 11 – Pre-development condition requiring the submiss of details of the Drainage and Watermain Planning Report to include the UHL hospital complex watermain network.
- Condition 12 – Implementation of noise mitigation measures as identified in the Noise Impact Assessment.

### **3.3. Planning Authority Reports**

#### **3.3.1. Planning Reports**

One planning report forms the basis of the assessment and recommendation. The following is noted:

- The principle of development is acceptable. It accords with the land use zoning objective for the site 'Education and Community Infrastructure', and is consistent with Objective SCSi O15 and ECON O17 of the development plan.
- The overall design and material finishes were acceptable and with assimilate Block A currently under construction.



- Building Height – existing building heights within the campus are between 2 and 8 stories. The Building Height Strategy – the site is not identified as a location suitable for tall buildings, however the strategy allows consideration of ‘taller buildings’ for flexibility on a case by case basis. The proposal is comparable to adjoining Block A and was deemed to be acceptable.
- Impacts of Residential Amenities in terms of overshadowing, loss of daylight – was satisfied that no undue impacts arose.
- New shared pedestrian and cyclist link at the north of the campus connecting to Neassan’s Road R526 is acceptable as it will enable direct and a safe route of access for cyclists into the campus.
- Car parking – None proposed. A Mobility Management Plan, Road Safety Audit and a Traffic and Transport Assessment are submitted. The Roads Department and Active Travel Department LCCC were satisfied with the proposals and recommended conditions, particularly having regard to the active travel scheme identified in the Limerick Shannon Metropolitan Area Transport Strategy (LSMATS) due to commence construction.
- Cycle Parking – notes that 290 no. bike spaces will be available. Bike parking will be available at basement level car parking. This was deemed acceptable.
- Mobility Management Plan – Park and ride with shuttle bus from the car parks to the hospitable is available. A very low cohort of staff uses public transport. The implementation of BusConnects with a more frequent bus service will enhance options for staff including planned improvements to the cycle network. The timing of shifts has an impact on public transport take up.
- Protected structure – the proposed development will not materially alter or detract from the character of the existing Church.
- Noise – Concerns raised regarding impacts on residential amenities. The Noise Impact Assessment concluded that significant impacts from construction phase will be low. At operational stage, acoustic screens are proposed at roof level around heat pumps which was considered acceptable.

### 3.3.2. Other Technical Reports

- Roads Department – No objection subject to conditions. In this regard, a pre-development is recommended regarding a Stage 2 detailed design stage storm water audit, Stage 3 completion storm water audit to demonstrate compliance with SuDS and surface water management plan. The Construction Management Plan and Site Specific Temporary Traffic Management Plan approved and in operation in relation to P.A. Ref. 23/60506 to apply to the proposed development.
- Active Travel Department – No objection subject to conditions which relate to staff changing facilities, to review the projected modal split in accordance with Section 3.2.2 of the Workplace Travel Plans – Guidelines for Planning Authorities, a monitoring progress report on the first anniversary of first occupation of the development, the provision of car pooling spaces and welfare facilities for construction phase.
- Climate Action & Environment Department – regarding Noise Impact Assessment, no objection subject to condition regarding implementation of noise mitigation measures.
- Architectural Conservation Officer – No objection.
- Council Ecologist – No objection.
- Fire & Emergency Services – No objection.

### **3.4. Prescribed Bodies**

- Uisce Éireann – No objection subject to connection agreement(s). Any works building over assets or divert existing services require consent, prior to works commencing.

The application was referred to An Taisce, HSE, the Department of Housing, Local Government and Heritage but no Responses were received.

### **3.5. Third Party Observations**

Four third party observations were received in relation to the proposed development by Martin and Niamh O'Dea, Alan Geary, Sinéad Fennessy, Thomas and Marian Loftus. The matters raised are largely covered by the grounds of appeal.

## 4.0 Planning History

### Appeal Site

- P.A. Ref. 23/60506 – Permission granted subject to 8 no. conditions, for new double basement car park (levels -01, -02), the provision of a department shell comprising medical floor space (levels 0, 01) and ancillary works (08<sup>th</sup> September 2023).

The following pre-development conditions are relevant:

- Condition 3 – (c) refers to the provision of car parking facilities for workers during construction.
- Condition 4 – (i) Construction Environmental Management Plan (CEMP),  
(iii) Construction Management and Delivery Plan to include Site Specific Traffic Management Plans (TTMP).
- Condition 5 – Site specific waste management plan.
- Condition 7 – Revised surface water /SuDS details.
- Condition 8 – (i) Revised site layout plan showing cycle storage spaces in accordance with Table DM 9(a) of the development plan.

### Adjoining Block A to the South – Under Construction

- P.A. Ref. 20/775 – Permission granted for a 4 storey extension (96 bed ward) above existing Emergency Department, and car parking. (03<sup>rd</sup> March 2021).

### Other Adjoining Recent Permissions

- P.A. Ref. 23/383 – Permission granted for single storey extension to radiology department and MRI building (10<sup>th</sup> October 2023).
- P.A. Ref. 24/60376 – Permission granted for 2 no. two storey emergency accommodation extensions and 18 no. car park spaces (12<sup>th</sup> June 2024).
- P.A. Ref. 24/60987 – Permission granted for a part two storey extension for a 24 no. bed ward (27<sup>th</sup> November 2024).

- P.A. Ref. 25/60149 – Permission granted to extend the existing ground floor building by 2 no. first floor extensions providing consultant offices, medical and open plan work space to serve the pathology department (27<sup>th</sup> May 2025).

## 5.0 Policy Context

### 5.1. National Policy

#### 5.1.1. The National Planning Framework – First Revision (April 2025)

The following is relevant:

- National Policy Objective 10

Deliver Transport Orientated Development (TOD) at scale at suitable locations, served by high capacity public transport and located within or adjacent to the built up footprint of the five cities or a metropolitan town and ensure compact and sequential patterns of growth.

- National Policy Objective 13

Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.

- National Policy Objective 37

Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages.

- National Strategic Outcome 5 Sustainable Mobility
- National Strategic Outcome 10 Access to Quality Childcare, Education and Health Services.

#### 5.1.2. Climate Action Plan 2025

This outlines measures and actions by which the national climate objective of transitioning to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy by 2050 is to be achieved. These include the delivery of carbon budgets and reduction of emissions across sectors of the economy. Key targets also include to further reduce emissions include a 20% reduction in total

vehicle kilometres travelled relative to business-as-usual, a 50% reduction in fuel usage, and significant increases to sustainable transport trips and modal share.

## **5.2. Regional Policy Context**

### **5.2.1. Regional Spatial & Economic Strategy for the Southern Region (RSES)**

- The RSES provides a high-level development framework for the southern region that guides the physical, economic and supports the implementation of the National Planning Framework (NPF).
- Under the RSES, there is a joint Metropolitan Area Strategic Plan (MASP) for Limerick city and Shannon town Limerick-Shannon MASP. Such plans support the implementation of the NPF at a regional level.

#### **Section 2.1 Limerick City**

The MASP supports the growth and development of health care facilities as proposed by the University Hospital Limerick in their Strategic Plan.

#### **Section 10.0 Social Inclusion and Infrastructure**

Limerick-Shannon MASP Policy Objective 23 Health Cities and Health Infrastructure

- a) It is an objective to seek investment in health service infrastructure within the Limerick-Shannon MASP area to meet existing and future regional population growth including supporting University Hospital Limerick to develop a consolidated integrated health district incorporating acute care, primary care, health education, innovation and research.
- b) It is an objective to grow and develop health care facilities as proposed by the University Hospital Limerick in their Strategic Plan.
- c) It is an objective to support the role of Limerick as a WHO Healthy City and seek investment in the delivery of recreation, environmental improvements, active travel and health services infrastructure that retains and improves on this status.

#### **Section 7.1.2 Healthy Communities**

- RPO 177 Childcare, Education and Health Services

It is an objective to improve access to quality childcare, education, and health services through initiatives and projects under the National Development Plan, alignment with Healthy Ireland and support development of outreach and community services for an expanding and ageing population.

- RPO 178 Universal Health Services

It is an objective to seek the delivery of better universal health services including mental health, at all levels of service delivery, including provision of 24 Hour Accident and Emergency Services and implementation of Sláintecare for an expanding and ageing population across the Region.

#### 5.2.2. Limerick Shannon Metropolitan Area Transport Strategy 2040 (LSMATS)

This strategy provides a long-term strategic framework for the planning and advancement of transport infrastructure and services within the Limerick-Shannon Metropolitan Area. It proposes a number of measures including the following which would relate to the Dooradoyle area:

- A BusConnects Limerick program to provide high-frequency public transport services to enhance connectivity between Limerick city and its suburbs.
- A cycling network that includes for a primary radial route from Mungret to the city centre serving the R510, R526 Ballinacurra Road serving UHL, South Circular Road, and Henry Street.
- The improvement of pedestrian infrastructure and linkages, the establishment of Strategic Walking Routes connecting residential areas to major employment hubs, third-level education institutions etc. This includes for a Strategic Walking Route proposed for St. Nesson's Road, UHL, Dooradoyle and Ballinacurra Crescent Shopping Centre.

#### 5.3. **Limerick City and County Development Plan 2022-2028**

##### ➤ **Chapter 3 Spatial Strategy**

##### Section 3.4.2.5 Urban Character Area Objectives

This sets out the Urban Character Areas (UCAs) identified in the Landscape Character Assessment and analysed in the Building Height Strategy.

### Table 3.2 Urban Character & Objectives

#### UCA O4 Southern Environs - Dooradoyle/ Raheen/ Mungret

This area covers the Southern Environs of the city and contains many modern housing developments dating in large part from the 1960s. Major housing initiatives are currently under way in the area. The area also accommodates a range of other uses including the Regional Hospital, Raheen Business Park, the Crescent Shopping Centre, educational institutions and recreational facilities.

#### Specific Objectives:

- a) Infill and brownfield development patterns to be favoured.
- b) Building Height Strategy to inform design of higher buildings and to direct high buildings to the areas in the City Centre that have been identified as having potential for increased building height, subject to comprehensive case by case assessment at planning application stage.
- c) Special Control Area in Mungret College Area to be retained, together with protected views.
- d) The Framework for Mungret to guide development in this location.
- e) Existing green spaces to be retained.

#### Objective CGR O9 Building Heights

It is an objective of the Council to:

- a) Ensure that all new tall buildings in Limerick City are designed in accordance with the character area objectives, tall building recommendations and criteria set out in the Development Management Standards. All such buildings shall be of an exceptional architectural quality and standard of design and finish.
- b) Focus delivery of tall buildings in the City Centre, in particular the areas that have been identified as having potential for increased building height. In particular, tall building clusters will be encouraged at The Quays, Colbert Station Quarter, Cleeves Site and The Docklands in accordance with the building classification criteria set out in the Building Height Strategy. There shall be a general presumption against tall buildings in other areas, except at designated areas and the gateway locations identified in the Tall Buildings at City Level Map below.

- c) Protect the unique intrinsic character, scale and significant views of Limerick City, the skyline and key landmark buildings in the delivery of increased building heights, through the application of the Tall Building Classifications, Recommendations, High Level Principles and Assessment Tools and Criteria set out in the Building Height Strategy.
- d) Ensure applications for tall buildings are supported by the following assessments and any additional assessments required at the discretion of the Planning Authority - Environmental Assessment, Wind Analysis, Sunlight and Daylight Analysis, Verified View Analysis, Landscape and Visual Impact Assessment, Architectural Design Statement, Traffic Impact Assessment including a Mobility Management Plan for non- residential uses, Building Services Strategy.

➤ **Chapter 5 A Strong Economy**

Objective ECON 017 Strategic Employment Locations City and Suburbs (in Limerick), Mungret and Annacotty

It is an objective of the Council to:

- a) Promote, facilitate and enable a diverse range of employment opportunities by facilitating appropriate development, improvement and expansion of enterprise and industry on appropriately zoned lands, accessible by public and sustainable modes of transport, subject to compliance with all relevant Development Management Standards and Section 28 Guidance at Strategic Employment Locations and other appropriately zoned locations in a sustainable manner.
- b) Facilitate and support Limerick City Centre, University Hospital Limerick, Raheen Business Park, the National Technology Park, Higher Education Institutes, Public Hospitals, Dock Road, Northside Business Campus, Opera Centre and Cleaves Site as Strategic Employment Locations, identified in accordance with the Limerick Shannon Metropolitan Area Strategic Plan.

➤ **Chapter 6 Environment, Heritage, Landscape, and Green Infrastructure**

Objective EH O31 Views and Prospects

It is an objective of the Council to:



a) Preserve, protect and encourage the enjoyment of views and prospects of special amenity value or special interests and to prevent development, which would block or otherwise interfere with views and/or prospects.

b) In areas where scenic views and prospects are listed in the Plan, there will be a presumption against development, except that required to facilitate farming and appropriate tourism and related activities. The development must be appropriately designed so that it can be integrated into the landscape.

## ➤ **Chapter 6 Environment, Heritage, Landscape and Green Infrastructure**

### Policy EH P5 Protection of the Built Environment

It is a policy of the Council to promote high standards for conserving and restoring the built environment and promote its value in improving living standards and its benefits to the economy.

### Map 6.1 Landscape Character Assessment

- UHL – located in the ‘Southern Environs’

## ➤ **Chapter 7 Sustainability Mobility and Transport**

### Policy TR P4 Promotion of Sustainable Patterns of Transport Use

It is a policy of the Council to seek to implement in a positive manner, in cooperation with other relevant authorities and agencies, the policies of the NPF, RSES and the Department of Transport’s Smarter Travel, A Sustainable Transport Future 2009 – 2020 (and any subsequent updates), to encourage more sustainable patterns of travel and greater use of sustainable forms of transport, including public transport, cycling and walking.

### Objective TR O6 Delivering Modal Split

It is an objective of the Council to: a) Promote a modal shift away from the private car towards more sustainable modes of transport including walking, cycling, carpool and public transport in conjunction with the relevant transport authorities; b) Support investment in sustainable transport infrastructure that will make walking, cycling, carpool and public transport more attractive, appealing and accessible for all.

### Objective TR O23 Mobility Management

It is an objective of the Council to require the submission of Mobility Management Plans, subject to the guidance provided in the Toolkit for School Travel, Safe Routes to School Programme, Workplace Travel Plans – A Guide for Implementers and Achieving Effective Workplace Travel Plans – Guidance for Local Authorities, for any development that the Council consider will have significant trip generation and attraction rates, at peak hours or throughout the day and where existing or proposed public transport may be utilised.

## ➤ **Chapter 10 Sustainable Communities and Social Infrastructure**

### Section 10.7 Health and Respite Care

Includes relevant policy objectives that support the proposed development which includes:

#### Objective SCSI O15 Health Care Facilities

It is an objective of the Council to:

- a) Support and facilitate development and expansion of health service infrastructure by the Health Service Executive, other statutory and voluntary agencies and private healthcare providers in the provision of healthcare facilities at appropriate locations - including the system of hospital care and the provision of community-based primary care facilities, mental health and wellbeing facilities.
- b) Encourage the integration of appropriate healthcare facilities within new and existing communities.

## ➤ **Chapter 11 Development Management Standards**

### Section 11.1.3 Building Heights

Requires that all new development in the city shall comply with the guidance set out in the Building Heights Strategy and Table DM 1: Limerick City Building Height Objectives, Recommendations and Criteria, where relevant.

### Section 11.8.1 Access to Roads, Traffic and Transport Assessments (TTAs) and Road Safety Audits (RSAs)

Developers will be required to submit a Traffic Impact Assessment/Traffic and Transport Assessment and/or Road Safety Audit where a new development will have a

significant effect on the travel demand and capacity of the existing road network in the area

### Section 11.8.3 Car and Bicycle Parking Standards

In relation to Table DM 9(a), The developer will submit a Justification Assessment in the Mobility Management Plan providing the rationale for the deviation from the parking standards above and of national planning guidance for their proposed development. Exceptional circumstances may includes:

- Limited/Restricted site area - Site size whereby refurbishment on sites of any size or urban infill schemes on sites of up to 0.25ha, car parking provision may be relaxed in part or whole, on a caseby-case basis, subject to overall design quality and location;
- Sustainable travel infrastructure supported by a Mobility Management Plan; Availability of car sharing and bike/e-bike sharing facilities on-site and in the vicinity;
- Existing car parking in the vicinity, including on street and the potential for dual use subject to agreement and management details;
- Impact on traffic safety and the capacity of the road network;
- Urban design, regeneration and civic benefits of the proposal including enhancement of public realm.

### Table DM 9(a) Car and Bicycle Parking Standards Limerick City and Suburbs (in Limerick) Mungret and Annacotty.

- **UHL is located in Zone 2.**

Car Parking                      1 no. space per 75 m<sup>2</sup>.

Bicycle Parking              1 no. space per staff + 1 no. space per 20 beds.

### Section 11.8.7 End of Journey Cycling Facilities

All cycling facilities will be assessed in accordance with the NTA's National Cycle Manual and any subsequent national guidance document.

The Council encourages developers to provide on-site supporting infrastructure for the cyclist including safe, secure, weather protected parking and shower facilities in workplaces. The following should be adhered to:

- One shower for high tech/ manufacturing and enterprise and employment development over 100sqm (over 5 employees);
- Two showers for high tech/ manufacturing and enterprise and employment development over 500sqm (25 employees);
- One shower per 1000sqm thereafter;
- Changing facilities/drying areas, toilets and lockers to be provided with sufficient ventilation.

#### ➤ **Chapter 12 Land Use Zoning Strategy**

- Land Use Zoning

The subject site is zoned Education and Community Facilities.

Objective: To protect and provide for educational, training and adult learning, community, healthcare, childcare, civic, religious and social infrastructure.

Purpose: To protect existing and allow for expansion of a wide range of educational facilities, services and related development. To facilitate sustainable development of community infrastructure and create an inclusive high quality of life. This land use will provide for community facilities, healthcare services, childcare, religious, social and civic infrastructure, ancillary purpose-built accommodation such as residential care or institutions to support the main use only, and other facilities.

### **Volume 6 Accompany Strategies – Building Height Strategy for Limerick City**

#### ➤ **Chapter 5**

The following is noted:

#### Southern Environs

- This area covers the urban area to the south west of the City Centre, on the southern side of the by-pass including Dooradoyle, Mungret, Ballycummin and Raheen.

- As a suburban area it is predominantly low rise, 1-3 storeys and substantially residential in character. The notable exceptions to the general height of the area are University Hospital Limerick on St. Nessian's Road and the Limerick City and County Council Offices, a landmark building on the Dooradoyle Road.
- The area also accommodates a range of other uses including the Crescent Shopping Centre, educational institutions, recreational facilities such as Garryowen Rugby Football Club and the substantial Raheen Business Park. Lands at Mungret Loughmore, c. 290 ha, are subject to a Masterplan for their development.
- The location of the M20 motorway to the east of the Southern Environs means that it is not a direct access route to the City Centre, instead being a destination in itself for work, shopping and healthcare provision.

#### Tall Building Recommendations

- The recommendations on tall buildings should be read in conjunction with Maps 6.8 and 6.9 as these identify suitable locations for tall buildings, as per the 'Tall Building Classifications', at the Character Area level and the City Level respectively. Given the localised nature of the 'Taller Building' category it is not appropriate or viable to seek to identify these on a map. Where a 'Taller Building' is considered appropriate in the context of a Character Area this is addressed in the text relating to the Character Area.
- Outside of the City Centre building height will primarily be a tool in the delivery of density in order to achieve compact growth in line with national policy requirements. It will largely be limited to buildings in the 'taller building' category, where deemed appropriate on a case by case basis. However, as indicated on the Urban Structure map, Map 5.1, there are a limited number of areas outside of the City Centre where buildings of height may be practical, viable and/or required. The 'Tall Buildings - City Scale' map, Map 6.8, identified these and utilises the Tall Building Classifications to indicate where 'landmark and gateway' buildings are permissible.

#### ➤ **Chapter 6 Building Height – Policies and Guidance**

#### Tall Building Policy

## Policy TB7: Assessment Criteria for Tall Building

Limerick City and County Council will take account of the following in assessing applications for tall buildings:

- The site context - Including inter alia topography, natural environment, landscape, height, built form, urban grain, scale, streetscape and impact on the skyline;
- Impact on significant buildings, views, landmarks and landscapes - Tall building proposals should address the potential effect on the setting of, and views to and from the following over a wide area:

\*Protected Structures

\*Architectural Conservation Areas

\*Sites on the Record of Monuments and Places \*Public Parks and Open Spaces

\*The River Shannon and other water bodies

\* Significant views and prospects, specifically those identified on Map 6.10 of this Building Height Strategy for Limerick City;

- The architectural quality of the building - Including inter alia its form, scale, massing, facade materials, proportion, relationship to other structures and the design of the top portion in terms of its potential impact on the skyline;
- The impact on the local environment - Including inter alia overlooking, daylight and sunlight, microclimate, wind, overshadowing, glare, loss of privacy, over-bearance, and the impact on residents due to the use of the building;
- Compliance with best practice in terms of the facilitation of sustainable modes of transport and the delivery of transport orientated development - Specifically the level of public transport provision to the site, the capacity of the public transport network and the quality of links between the site and public transport;
- The impact on the surrounding context - Including inter alia localised views, the quality and scale of existing streets, spaces and adjacent buildings and the contribution to permeability at both the site level and the wider area;

- The contribution to wayfinding - This includes the building's role as a locational marker from the local, street level, to the wider City wide level;
- Sustainability and environmental performance - Including inter alia design, construction technology, materials, renewable energy initiatives, adaptability, operation and management;
- The contribution to public spaces, amenities and facilities, both internal and external - Including inter alia the provision of a mix of uses, especially at ground floor level, publicly accessible areas and spaces and the integration with and contribution to the public realm; and
- The quality of the built environment - From the perspective of those who will be using the building. The above list is non-exhaustive. All applications for tall buildings will be rigorously assessed on a case by case basis, with regard had to any other matters deemed appropriate and relevant by the Planning Authority.

#### **5.4. Natural Heritage Designations**

- SPA: 004077 - River Shannon and River Fergus Estuaries SPA – approx. 1.18 km to the north.
- SAC: 002165 - Lower River Shannon SAC – approx. 108 km to the north.
- pNHA: 002048 - Fergus Estuary And Inner Shannon, North Shore – approx. 108 km to the north.
- pNHA: 000438 - Loughmore Common Turlough – approx. 1.48 km to the southeast.

## **6.0 EIA Screening**

- 6.1. EIA pre-screening and EIA screening determinations are included in Appendix 1 and 2 of this report.
- 6.2. The EIA Screening Determination concludes that the proposed development would not be likely to have significant effects on the environment, and that an EIAR is not required. This conclusion is based on regard being had to the following:
1. The criteria set out in Schedule 7, in particular

- a) The nature and scale of the proposed development which is below the threshold in respect of class 10(b)(iv) of Part 2, Schedule 5 of the Planning and Development Regulations 2001 (as amended), in this case the subject development has a stated area of 0.0406 ha, and will occur on the footprint of the previously permitted development P.A. 23/60506 within the existing site context serviced by public infrastructure,
  - b) The nature of the existing site context i.e. the established University Hospital Campus,
  - c) The nature of the development and the provisions of Policy Objective 23 of the Limerick-Shannon MASP and Objectives ECON 017 and SCS1 015 of the Limerick City and County Development Plan 2022-2028 which seek to support and facilitate expansion of UHL and HSE services,
  - d) The availability of existing public water and wastewater infrastructure to serve the development,
  - e) The absence of any significant environmental sensitivity in the vicinity,
  - f) The location of the development outside of any sensitive location specified in article 109(4)(a) of the Planning and Development Regulations 2001 (as amended).
2. The results of other relevant assessments of the effects on the environment submitted by the applicant i.e. An Appropriate Assessment Screening, Noise Impact Assessment, Resource and Waste Management Plan and Operational Waste Management Plan for the proposed development, Schedule 7A information provided in support of the application.

6.3. The proposed development would not be likely to have significant effects on the environment, and an EIAR is not required.

## **7.0 The Appeal**

### **7.1. Grounds of Appeal**

One third party appeal was received from Thomas Loftus and others. The grounds of appeal may be summarised as follows:



### Visual Impact

- The UHL campus is not one of the locations identified in the Limerick Building Height Strategy 2022-2028 (LBHS). The justification for additional high-rise development on the basis of proximity to existing high-rise is not appropriate or logical. This approach only factors in adjacent buildings or those to the rear of the proposed development it does not take account of the accumulation of negative impact on nearby low rise neighborhoods.
- The Visual Impact Assessment (VIA) of the proposed development was not adequately addressed by the Planning Authority (PA). It only factored in adjacent buildings or those to the rear of the proposed development.
- The proposed development in tandem with the building nearing completion will have a significant detrimental impact on nearby residents (impacting on privacy and daylight) such that some are considering moving.
- The VIA report of the permitted building under construction P.A. Ref. 20/775 was seriously deficient and misleading and the VIA report under the current application is misleading using side-on reference points, but none from most obvious front facing aspect.
- Daylight analysis was considered, however this is not a measure of visual impact.
- Reference points for Willsbrook and Gouldavoher should be used.

### Construction Noise

- Construction activity and noise are regulated by condition no. 3 of the final grant. In particular the hours of operation are restricted to 08:00 am to 8:00 pm Monday to Friday, and 08:00 a.m. to 4:00 pm Saturdays. Building works are not supposed to start before 08:00 am. A similar condition was included under P.A. Ref. 20/775. Noise from construction activity on site frequently starts before 08:00 am. Therefore conditions are not being complied with.

### Traffic & Parking

- Ongoing development of the site is significantly exacerbating and not easing existing traffic difficulties.

- The introduction of a traffic flow system by UHL to address large volumes of traffic leaving the site c. 4:00 pm are required to turn left and head southwards to exit. This has resulted in gridlock and a large number of cars use Willbrook entrance to turn back towards town. This has resulted in a dangerous situation.
- Condition 3(c) of the final grant requires adequate car parking facilities to be proposed on site for workers and visitors. Currently large numbers of construction works, UHL staff and visitors routinely park in neighbouring estates.
- Large parts of the campus are devoted to carparking. Such sites should be converted to multi-storey and basement car parks, without unnecessary intrusion of visual amenities and would free up space for other uses within the campus.

#### Future Development Proposals

- Concern raised regard future high-rise development proposals on the subject site and across the road at the Regional Ambulance Centre, with specific reference to proposals for a multi-storey car park, in this location.

#### Request for Oral Hearing

- No consideration given by the HSE to the impacts on residential amenities of neighbouring properties relating to visual amenity and privacy.
- An in-hospital garden is part of the proposals for staff welfare and patients. Neighbouring residents impacted by the proposed development should receive similar considerations.
- An oral hearing may offer the possibility of constructive engagement with the HSE with a view to agreeing mitigation measures for the impacts on neighbouring properties.

## **7.2. Applicant Response**

The applicant's response to the grounds of appeal was received which can be summarised as follows:

#### Building Height

- The proposed development will result in a building that will be taller than prevailing building heights in the Dooradoyle area of the city. UHL is a designated Model 4 hospital for the Midwest region and plays an important strategic role. It is therefore expected to be developed with buildings of varying form and heights which is not uncommon for a hospital campus of this nature.
- UHL is located within the 'Southern Environs' of Limerick City's urban structure in the development plan which also includes Dooradoyle. The Limerick Building Height Strategy (LBHS) notes that a suburban area is predominantly low-rise (1-3) storeys and substantially residential in character, the notable exception to the general height of the area are UHL on St Nessian's Road, and the council offices on the Dooradoyle road. In light of that, the building height at UHL are considered exceptions within the overall area.
- The appellant contends that the proposed development meets the criteria for a tall building having regard to the LBHS and the LBHS does not indicate UHL as a suitable location for such buildings – the definition referenced by the appellant appears to relate to a quotation from Section 4 of the LBHS which pertains to 'international policy and practice review'. The council's definition of a tall building is reference in page 111 of the LBHS.
- The UHL campus already accommodates buildings of varying height some of which may be considered tall buildings. This includes for the buildings to the east and north of proposed Block B range from 1-6 stories, Block A is 7 stories high, to the south of Block A is another 7 storey building. Proposed Block B will be approx. 3.78 m taller than Block A and will therefore not be significantly taller than existing structures. It will provide an appropriate transition in height along St Nessian's Road.
- It is acknowledged that UHL is not identified in the LBHS as a location, this does not preclude it as a proposal.
- The transition to taller buildings within the campus is also a direct response to national planning policy – Urban Development and Building Heights – Guidelines for Planning Authorities 2018. Appendix A of the Planning Report submitted under P.A. Ref. 25/60249 provides an assessment in regard to Policy TB 7 of the LBHS and complies with the LBHS.

- UHL is evolving to meet demand and this includes for urban form and building heights over the last 15 years and the current proposal reflects the hospital strategic role to accommodate the region's population growth.

#### Visual Impact

- The VIA submitted shows the current proposal in tandem with the existing permitted development is criticised for being misleading and insufficient as it does not include key viewpoints from properties facing the proposed development e.g. Willsbrook and Gouldavoher estates.
- The vantage points chosen for the assessment were selected to capture the proposal along St Nessian's Road which is the most visible on approach from the north and south of the site.
- Four additional views from the appellant's cited locations are submitted in response to the appeal to assess visual impact on surrounding properties to the west of the appeal site.
- Regarding mitigation measures such as trees, following inspection of the boundary to the rear of the ambulance centre, there is a 4.0 m high building directly adjacent to no's 35 and 36 Willbrooks and established vegetation. It is not feasible to provide additional landscaping mitigation, as requested by the appellant.

#### Daylight

- A revised Daylight Impact Assessment is submitted to address inconsistencies highlighted in the third party submissions to the planning application. The results of Table 2 of the assessment are consistent across all the rear private amenity gardens of the 3 no. properties shown in Figure 3.1 of the appeal.
- The assessment concluded that the proposed development complies with BRE Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice (2022) and will not adversely affect existing residential amenity to the west of the appeal site.

#### Loss of Privacy

- The setback distance of the proposed development to the nearest residential properties in Willsbrook estate is c. 95 m and c. 133 m in Gouldavoher estate. There is no direct lines of sight into these properties and the potential for overlooking and consequent impact on residential amenities is limited. The windows serving the ward bedrooms are angled away from the line of the façade so that they do not look directly south towards residential properties.

#### Construction Noise

- A response to the appellant's contention that construction works commence before 08:00 am prepared by O'Connell Mahon Kevin Jackson Architects (OCMA) is provided. This notes that the construction contractor strictly enforces construction operation hours in line with the conditions of planning.
- It is acknowledged that UHL did receive complaints regarding noise nuisance from construction activities occurring outside of restricted hours of operation, the matter was addressed by the contractor.

#### Traffic Congestion and Road Safety

- The proposed development primarily comprises a rooftop extension above an already permitted development that includes basement parking. The current application does not propose additional car parking, but instead supports sustainable travel through the provision of a significant quantity of bicycle parking. In that regard it cannot reasonably be concluded that the proposed development in itself will exacerbate the existing traffic situation during its operational phase.
- The resultant increase in traffic to and from the site associated with the future Block B extension was previously assessed under P.A. Ref. 23/60506 and was deemed acceptable by the PA subject to conditions attached to that permission.
- Additional detail from the contractor regarding the measures being taken to manage traffic disruption in and around the hospital during construction stage is prepared by OCMA. Construction of the proposed extension is planned to commence in tandem with the completion of the permitted shell. Traffic management and safety measures will be strictly implemented throughout all construction stages until Block A and Block B are fully completed.

- While some traffic disruption is inevitable such impacts are typical of any construction project and are temporary in nature, and will be managed in accordance with the approved Construction Environmental Management Plan (CEMP). The HSE's Primary objective is to deliver additional wards on the UHL campus as quickly as possible in response to the urgent need to increased bed capacity.

#### Insufficient Car Parking Works and Visitors During Construction

- With regard to the appellants' contention that construction workers and visitors are parking in nearby estates, a green travel plan is prepared by the contractor which strongly encourages construction staff to use more sustainable modes of transport to the hospital rather than the car. However every effort is being made to discourage staff and visitors from parking in nearby residential estates, individual behavior is beyond the applicant's direct control.
- As required under condition 3 of the grant, an area for short term parking will be provided on site during the construction stage which will be determined post planning by the contractor.
- The planning application and appeals process is not an appropriate mechanism for regulating or enforcing parking restrictions on third party lands.

#### Future High-rise Development Proposals

- The concern raised by the appellant regarding future high-rise development along St Nessan's Road and at the regional ambulance centre is based on the PA's justification for granting permission for additional building heights being grounded solely in their proximity to existing high-rise structures, and fails to consider cumulative impacts on neighbouring residential properties.
- In response to the appellant's submission, ACP can only assess and decide upon the proposed development. Any future development proposals for the UHL campus will be subject to separate design process requiring the submission of an application for approval at a later stage. All future applications will be considered on a case by case basis and assessed on individual merits, and will be subject to public consultation in line with statutory requirements in accordance with planning legislation.

- A letter is provided by OCMA which addresses future development proposals at the hospital and explains the reason why relocating the proposed development further into the site is neither feasible or practical.
- The proposed development will ultimately see the full completion of the St Nessan's Road urban edge, which has been designed to be functional and visually appealing serving as a focal point upon arrival at the Regional Hospital.

As part of the response to the grounds of appeal, the following are appended to the submission:

- Letter response by OCMA supporting the points addressed in the first party appeal response.
- UHL Site Delivery Information – provided by SISK building contractors including a construction traffic management plan and routes.
- Email correspondence between the PA and the architects agreeing to a programme of works to take place outside of permission conditions.
- Details of park and ride facilities.
- Supplementary Visual Impact Assessment appraisal.

### **7.3. Planning Authority Response**

Response received from PA noting that no further comments to make outside of the assessment of the planning application.

### **7.4. Observations**

None.

### **7.5. Further Responses**

- 7.5.1. 1 no. third party submission was received in response to the applicant's response to the grounds of the third party appeal from Thomas Loftus. The issues raised in the submission are summarised as follows:

#### Scale of Development and Visual Impact

- The scale and intensity of development has resulted in recent developments along St Nessan's road has resulted in the removal a line of trees resulting in

an unattractive urban edge, given rise to visual impact, impact on privacy, traffic, parking and noise problems to nearby residents, and is not sustainable.

- Block B will be taller than Block A and there is no account of cumulative impacts to the area.
- The additional visual impact assessment carried out is not satisfactory. It includes the vantage points referred to in the grounds of appeal. These were not taken at the rear of the properties which is the location where significant visual impacts occur and impact on privacy. The photos are taken at the front of the houses c. 50-60 m further back, which provide a partial screening of both blocks. An appropriately carried out VIA would find profound and hugely detrimental visual/privacy impacts.
- The response includes photos taken at the rear of affected properties which provide a more accurate indication of the impacts. The benefits of screening are shown in a number of photos.
- Regarding screening mitigation measures at the rear of the ambulance centre which shares a boundary with affected residential properties, the provision of screening proposals should be provided to break up the cumulative monolithic appearance of Block B and Block A if permitted.

#### Impact on Daylight

- Block A and Block B will significantly delay sunrises and reduce the amount of daylight in comparison to what was previously available.

#### Loss of Privacy

- Block A overlooks the rear of properties in Willsbrook / Gouldavoher, particularly from balcony windows.
- The layout of Willsbrook and Gouldavoher is oval in configuration and there will be direct lines of sight from Block B if approved which would compound the impacts from Block A, regardless of angling of ward windows.

#### Construction Noise

- In relation to Block A, construction works are noted to be taking place outside of permitted hours raising the question if such activities were permitted. This



suggests that management are not regularly monitoring construction activities and are only acting to enforce when a complaint is made by a neighbour.

#### Traffic Congestion & Road Safety

- UHL is the source of traffic problems in the area and need to do more to address issues highlighted i.e. the impact on traffic external to the hospital as the one-way system encourages drivers to use Willsbrook entrance as an unofficial roundabout.

#### Car Parking

- A recent application is made by HSE/UHL P.A. Ref. 25/60715 for a separate development. It proposes a small number of designated parking spaces which is a piecemeal approach to the parking issue.
- Notwithstanding the commitment by the applicant to providing on-site parking and implementation of measures to minimise disruption, the reality is that construction staff, UHL staff and visitors regularly parking in neighbouring estates. The HSE should recognise that the issues are as a result of ongoing intensification of development. Some of the large surface car parking areas within the UHL campus should be multi-storey car parks to alleviate the problem.

#### Future Development Plans

- The ongoing development of the hospital campus and the benefits of consolidating services together could be achieved in a less intrusive way by the HSE through a more holistic and less piecemeal approach and to mitigate impacts on the neighbouring residential areas.

## **8.0 Assessment**

Having examined the application details and all other documentation on file, including all of the submissions received in relation to the appeal, the reports of the local authority, and having inspected the site, and having regard to the relevant local, regional and national policies and guidance, I consider that the substantive issues in this appeal to be considered are as follows:

- Principle of Development
- Height, Scale & Visual Impact
- Impact on Residential Amenity
- Traffic & Access
- Other Matters

## 8.1. Principle of Development

- 8.1.1. The appeal site is zoned 'Education and Community Facilities' the objective for which is *'to protect and provide for educational, training and adult learning, community, healthcare, childcare, civic, religious and social infrastructure'*. The purpose of the zoning is *'to protect existing and allow for expansion of a wide range of educational facilities, services and related development'* and to *'facilitate sustainable development of community infrastructure and create an inclusive high quality of life'*. Healthcare services and infrastructure is permitted in principle within this zoning. The proposed development seeks to build a vertical extension on the footprint of the existing permitted development. The Zoning Matrix in Chapter 12 of the development plan indicates that a hospital is a land use that is generally permitted on lands zoned 'Education and Community Facilities'.
- 8.1.2. Limerick city and suburbs which includes the appeal site is at Level 1 in the Settlement Hierarchy in Table 2.4 of the development plan. It is designated for significant growth under the NPF (April 2025) and in the RSES. In this regard, the NPF under NSO 10 recognises health services as a strategic investment priority and the delivery of transport orientated development under NPO 10. The RSES which includes a Metropolitan Area Strategic Plan for Limerick-Shannon (MSAP) sets out the spatial strategy for the Limerick city and prioritises compact growth, employment and public transport, walking and cycling networks. The RSES also recognises and supports UHL in the provision of medical services at a regional level within the mid-west region (counties Clare, Limerick and Tipperary).
- 8.1.3. Having regard to the proposed development within the existing UHL campus which provides acute hospital services and in particular to Policy Objective 23 of the Limerick-Shannon MASP, I consider that the proposed development on the site zoned

for 'Education and Community Facilities' is consistent with national planning policy including NSO 10, NPO 10, NPO 13 NPO 37 of the NPF and regional spatial planning policy objectives of the RSES including RPO 177 and RPO 178. It also meets objective SCS1 O15 of the development plan. I am therefore satisfied that the proposed development is consistent in principle with the zoning provisions of the development plan for this site.

- 8.1.4. I note that it is proposed as part of this application to carry out alterations to the permitted 'shell' development under P.A. Ref. 23/60506 as described in Section 2.0 above. I have reviewed the proposals and consider that these amendments are acceptable.

## **8.2. Height, Scale & Visual Impact**

### Height & Scale

- 8.2.1. Concerns have been raised in the grounds of appeal of the appropriateness of the height and scale of the proposed development which will have a negative impact on the visual amenity of the area and on nearby residential amenities. It is also raised that the height of the proposed development is at variance with the Building Height Strategy for Limerick City.
- 8.2.2. The proposed development Block B, is essentially a vertical extension over the footprint of the existing permitted development P.A. Ref. 23/60506 (permitted approx. height 15.230 m), and it adjoins Block A which is to the south and is under construction and nearing completion. Block A was permitted under P.A. Ref. 20/775 and relates to a 4 storey building above the existing 3 storey building which facilitates the Emergency Department (ED), Renal Dialysis Department (RDD) and basement car parking. I note that the overall height is approx. 29 m above ground level.
- 8.2.3. I note that the design of Block B is informed by the existing site context and assimilates Block A in terms of design, scale and finishes. It will present as a 7 storey building along St Nessan's Road and will have an overall height of approx. 36.870 m depending on existing ground levels. At roof level, the height will vary due to the configuration of the installation of plant/machinery accommodation and flue vents and will be slightly higher than Block A as a result, with a max roof height of approx. 37 m at finish ground level.

- 8.2.4. In terms of compliance with development plan policy and in particular the Building Height Strategy for Limerick City, I note that UHL is not identified on Map 6.8 of the Building Height Strategy nor is it designated as a location to accommodate taller buildings. I note however that the appeal site forms part of the wider hospital campus and the development plan has included the existing Limerick regional hospital under UCA 04 Southern Environs in Table 3.2. A number of the specific objectives set out for UCA 04 include for (a) infill and brownfield development patterns to be favoured in the context of increased building heights and (b) subject to the design being informed by the Building Height Strategy, and subject to comprehensive assessment on a case by case basis.
- 8.2.5. In terms of the Building Height Strategy for Limerick City, I note that taller buildings are classified as '*a building that is significantly taller than the surrounding and established buildings heights in an area*'. The strategy acknowledges that this is a broad definition however it highlights that existing site context and the established building height of the area are relevant considerations in the context of the perceived tallness of a building. This in my view is applicable to the appeal site.
- 8.2.6. UHL is a regional hospital and its status as such a hospital is reflected in the level of acute medical services that the hospital is required to provide for the mid-western region. Accordingly over time the hospital has evolved to provide these acute services and this is reflected in the planning history of the site and in the adjoining development currently under construction. The precedent for taller buildings is already established on the site. The original hospital is a 3 – 4 storey high building and the existing ED building is 5-6 storey high building. The proposed development is a large scale development similar to that under construction. It will complete the urban edge along St Nessian's Road and I consider that the design principles are strong and attractive and will integrate with the aesthetics of Block A and other adjoining buildings within the hospital campus. In this regard, I am satisfied that this is consistent with Policy Objective UCA 04 and Objective CGR O9 of the development plan and is therefore acceptable.

#### Visual Impact

- 8.2.7. The grounds of appeal raise that justifying increased height based on the existing site context is not appropriate in this case as it only factors in the buildings adjacent on the

site. It is submitted that cumulatively both the existing development and the proposed development would have a detrimental visual impact on the area and on residential amenities. Reference is also made to the Visual Impact Assessment submitted for Block A (P.A. Ref. 20/775) and the inadequacy of that assessment.

- 8.2.8. In this case, the area is a suburban built-up area approx. 3.3 km to the southwest of Limerick city centre. Surrounding the hospital, the area is characterised by low density housing predominantly two storey in scale, and small scale commercial and retail developments, pockets of recreational and amenity spaces and schools. The area is also noted to be low-lying. I consider that the visual impacts relate to the local community, road users and the visual change to the urban character of the area and how this might effect visual amenity.
- 8.2.9. In support of the application and the appeal, an updated Visual Impact Assessment (VIA) is provided with computer generated photomontages of how the proposed development will appear from several locations including from the main road and in addition to those cited by the appellants in the grounds of appeal. In reviewing the VIA, I consider that it is adequate to assess the impacts arising from the proposed development.
- 8.2.10. I note that there are no sensitive landscape receptors or sensitive views and prospects relative to the area. The appeal site and the general area is located in the 'southern environs' urban structure / character area, having regard to Table 3.2 of the development plan. In this regard I do not consider that this receiving urban environment would be sensitive to change and that such urban environments would be susceptible to change in any case. While the scale of the proposed development is significant, considering the policy context as set out above and in considering the characteristics of the existing hospital on the site, I do not consider that the proposed development will unduly impact on the visual amenities of the surrounding urban area. I consider the design and scale to be acceptable and it adequately integrates with Block A providing an enhanced urban edge and modern streetscape along St Nessel's road.
- 8.2.11. At time of site inspection, I viewed the appeal site and the overall UHL campus from the locations identified on the updated VIA and using Block A that is under construction and nearing completion as a visual aid, I was able to conclude that there is substantial setback distance (c. 336 m+) from the proposed Block A relative to the rear of existing

dwelling located in Willisbrock estate and the other estates referenced. Therefore I do not have concerns in regard to the visual dominance or overbearance of the proposed development in conjunction with Block A relative to adjoining residential properties or the immediate area.

- 8.2.12. I note that the appellant has made specific reference to the regional ambulance centre located directly across the road to UHL, west of St Nesson's road and which backs onto what appears to be the shared boundary with the residential areas of Willsbrook and Gouldavoher estates. I noted at time of site inspection that the structures within the grounds broadly reflect the height of the adjoining residential properties and in some cases a number of existing structures are at a lower height level. The appellant has raised that mitigation measures in the form of tree planting to screen the proposed development should be provided along this shared boundary. I note that the first party applicant has indicated that the existing 4.0 m high ambulance building is located directly adjacent to the boundary of no. 35 and 36 Willsbrook estate and that new planting in this location would not be possible. I would note for the Commission that views from houses and individual properties are a matter of private amenity and in this case, I do not consider it appropriate to provide a belt of screening along the shared boundary as referenced.

### **8.3. Impact on Residential Amenity**

- 8.3.1. The main impacts on residential amenities raised in the grounds of appeal relate to impact on daylight, privacy and noise arising from construction works. In terms of impact on daylight, a Daylight Impact Assessment of the proposed development has been undertaken in accordance with the BRE Guidelines 'Site Layout Planning for Daylight and Sunlight (3<sup>rd</sup> edition)' and submitted with the application. This presents 'before' and 'after' scenarios in relation to the assessment of skylight and sunlight access levels in relation to neighbouring properties which includes for properties identified in the grounds of appeal. Overshadowing is also considered.

#### Loss of Daylight

- 8.3.2. In relation to access to skylight, I note that the results of Study A carried out concluded for a 'worst case' scenario that reasonable skylight would remain available with little to no impact occurring. In using the angular criteria set out in Section 2.2.5 of the BRE

Guidelines, the proposed development would sit below the 25° line. With regard to sunlight levels received by habitable rooms, the appraisal concluded that based on a 'worst case' scenario that the proposed development would not adversely affect the sunlight available to neighbouring properties. Having regard to my site inspection and to the location of the dwellings relative to the proposed development, I concur with this assessment and I do not consider that the proposed development will result in undue impacts to adjoining residential amenities.

#### Sunlight to Existing Amenity Space / Overshadowing

- 8.3.3. A further assessment was undertaken of access to sunlight in the private amenity spaces of neighbouring properties. In relation to sunlight to amenity spaces, Section 3.3 of the BRE Guidelines state that good site layout planning for daylight and sunlight should not limit itself to providing good natural lighting inside buildings. Section 3.3.17 of the guidance document provides that for a space to appear adequately sunlight throughout the year, at least half of the garden or amenity area should receive at least two hours on the 21<sup>st</sup> March. In this case it is evident from the Shadow Casting Imagery for the 21<sup>st</sup> March that access to sunlight more than exceeds the acceptable minimum standards for the identified properties and I am satisfied also that the proposed development will not significantly delay sunrise, as submitted in the grounds of appeal.
- 8.3.4. In terms of overshadowing, notwithstanding the scale and height of the proposed development, and having regard to its juxtaposition relative to the adjoining residential development located to the west of the appeal site, and to the separation distances between the appeal site and to the nearest residential receptor, and having reviewed the indicative Shadow Casting Imagery provided, I am satisfied that the proposed development will not give rise to undue impacts on any residential property within the vicinity. In this regard, I am satisfied that the private amenity spaces of the dwellings referenced in the grounds of appeal will not be impacted, and that daylight received exceeds minimum acceptable standards as set out in the BRE Guidelines 'Site Layout Planning for Daylight and Sunlight (2022)'.

#### Construction Noise

- 8.3.5. The grounds of appeal have raised that construction activity related to Block A in some instances occurred outside of the permitted hours of operation regulated by condition no. 3 of that grant of permission. In this regard it is queried if construction activity

occurring outside of the permitted hours of operation was permitted and if conditions are being complied with. Concerns are further raised that noise from construction activity is audible from nearby residential properties.

- 8.3.6. While there is an onus on the applicant to comply with conditions related to a separate planning permission, matters of non-compliance with planning conditions is an enforcement issue which is a matter for the local authority. An Comisiún Pleanála does not have an enforcement function and the scope of this assessment relates only to the permission sought, as described in the public notices and indicated on the plans and drawings provided with the application details.
- 8.3.7. In terms of the concerns raised regarding noise levels associated with the proposed development, a Noise Impact Assessment (NIA) was undertaken as part of the application. This addresses noise levels arising from construction stage and operational stage. Base line information was obtained with regard to the receiving environment at the locations identified in Figure 1 of Section 3.0.
- 8.3.8. The nearest third party sensitive receptors identified for the purposes of the NIA were identified to the west of the appeal site and are identified in Section 4.1 and Figure 2.2. I note that these include a number of the residential estates identified in the grounds of appeal with the nearest identified residential properties at approx. 110 m. Arising from construction activities, the predicted construction noise levels at the identified sensitive noise receptors will be at or below the threshold above which a significant impact is likely to occur.
- 8.3.9. At operational phase, plant operation is deemed to be the main source of noise and plant room at level 02 and at level 07 are identified as the locations for the main source noises arising from plant operation. I note that level 02 will be fully enclosed with external vents. Level 07 will have an external screen and will contain a number of air source heat pumps and extractor fans serving the building. The assessment carried out is based on predicted noise calculation generated by computer-generated modelling for the night-time period which is used as the basis for the assessment. I note that compliance with night-time assessment will ensure compliance with day-time assessment and in one scenario it includes for an acoustic screen encompassing roof level plant. Each of the identified nearest noise sensitive receptors were assessed having regard to BS 4142 standard which is between 07:00 to 23:00 hrs. The



assessment concluded that during day-time at the locations, noise level is between -11 and -2 dB which is indicative of sound sources having a low impact.

- 8.3.10. Overall, based on my review of the NIA, I am satisfied that it has been clearly demonstrated that the potential for significant noise effects at construction stage and at operational stage is low. At time of site inspection which was during day-time hours and before lunch time, I observed noise effects from a number of the sites identified in Figure 2.2 and found that noise levels were generally low and not in excess of noise levels occurring related to passing traffic. I note that a number of recommendations regarding good practice mitigation measures are proposed in the NIA to minimise noise effects from construction activities and operational phase which are set out in Section 4.4 of the NIA. In the event of a grant, I recommend that the Commission includes a condition in regard to the implementation of noise mitigation measures to ensure the effects on nearby residential amenities is minimised. However I do not consider that noise monitoring is necessary to be carried out having regard to the results of the NIA.

#### **8.4. Traffic & Parking**

- 8.4.1. The grounds of appeal have raised that ongoing development of the site is resulting in increased traffic problems. In this regard, the implementation of a traffic flow system by UHL has resulted in traffic turning left onto St Neassan's road to exit which has resulted in increased traffic problems and traffic safety.
- 8.4.2. I note that UHL is a teaching hospital as well as being a significant employer at local level and to a lesser extent at regional level, providing employment to a substantial work force of over 3,600 in various roles and departments operating on varying work schedules and working hours, with approx. 1,500 staff on campus at any one time in the day. It is anticipated that the proposed development in addition to other developments will result in staff levels increasing to 1,600 at the busiest time of the day. The issue of car parking and the consequent impact on traffic is acknowledged and I propose to address these issues separately below.

##### Car Parking

- 8.4.3. I note that car parking is not proposed as part of this application, however additional bicycle parking spaces and other facilities are proposed. I further note the quantum of

the work force and the associated shift patterns and the varying job roles and the operation of the hospital on a 24 hour basis. In this regard, It is anticipated that the proposed development in addition to other developments will result in staff levels increasing to 1,600 at the busiest time of the day.

8.4.4. In terms of the proposed development, I note that 131 no. spaces was permitted under P.A. Ref. 23/60506 which relates to the appeal site and which is proposed to accommodate the additional car parking needs associated with the proposed development. In this regard I note the following:

- The overall quantum of car parking is estimated to be 1,629 car parking spaces (717 public, 912 staff).
- Following the completion of P.A. Ref. 24/60376, 18 no. car parking spaces will be provided.
- Under P.A. Ref. 23/60506 which relates to the appeal site, this permitted 131 no. spaces basement level car parking permitted. In reviewing the site history, I note that the Traffic & Transport Impact Assessment for this application made provision within its calculations based on the anticipated future new floor space associated with the subject appeal and which related to approx. 13,000 m<sup>2</sup> medical floor space.

8.4.5. The maximum staff level at any one time on site is noted to be approx. 1,500 of which 82% is car based. I acknowledge that the overall hospital campus has car parking constraints and that as UHL evolved the car parking requirements have also increased. I would also concur with the appellant's point that there is potential within the hospital campus to provide multi-storey car parking, having regard to the extent of existing surface car parking available. However I note UHL management has sought to manage and mitigate car parking demand by the implementation of a number of measures. These include for operating a shuttle bus park and ride service from a number of designated park and ride sites that align with hospital shifts, the relocation of 100 non-clinical staff to another premises, the implementation of a form of blended working that enables certain cohorts of staff to work flexibly, and the continued promotion of active travel, public transport and carpooling.

8.4.6. It is important to note that the UHL campus is served by pedestrian and cycle linkages and that the area is also serviced by regular public transport and I note that the area

is subject to ongoing public transport enhancement proposals and other proposals identified in Limerick Active Travel and in the LSMATS.

- 8.4.7. I note that the PA, in particular the Roads Department appraised the proposed development having regard to the T&TIA and the Mobility Management Plan (MMP) submitted in support of the application and were satisfied with the proposed development and raised no objections to same. Having reviewed both the T&TIA and MMP submitted with the application details, I am satisfied that the car parking requirements have been addressed and are met under P.A. Ref. 23/60506 and are broadly consistent with Table DM 9(a) Car and Bicycle Parking Standards Limerick City and Suburbs (in Limerick) Mungret and Annacotty.

#### Bicycle Parking

- 8.4.8. I note that there are 114 no. existing bicycle spaces on campus across 6 no. locations which are identified in Appendix B of T&TIA. Under P.A. Ref. 23/60506, 32 no. spaces are permitted within the basement car park resulting in a total of 146 no. spaces.
- 8.4.9. Under the proposed development, a total of 144 no. bicycle spaces are proposed. In addition the following is also proposed:
- A new shared pedestrian and cycle access from St Nesson's road at the northern boundary of the site to provide access to a new secure cycle parking facility providing for capacity of 54 no. new bicycle spaces and 20 unsecured spaces.
  - Secure cycle parking facilities with capacity for 42 spaces at the western section of the campus (close to oncology).
  - 28 no. spaces proposed at the existing pedestrian access from St Nesson's Road .
- 8.4.10. The overall total once the development is completed will amount to 290 no. spaces (refer to Appendix B, DWG Ref. UHLSHL-OCMA-00-A-4002 'Proposed Cycle Storage and Changing Rooms' of the T&TIA). I note that the applicant prior to the submission of the planning application, agreed with the PA and the Active Travel Department the proposed bicycle provision for the subject development and the enhanced proposals for the wider site in terms of quantity and location of bike spaces and storage. I note that the Active Travel Department of LCCC did not raise objection to the proposals

submitted with the application and that the PA was satisfied that the bicycle proposals were adequate.

8.4.11. I have reviewed the proposals having regard to Table DM 9(a) Car and Bicycling Standards and I note that 1 no. space is required per 5 staff, + 1 no. space per 20 beds. Bike parking provision was addressed under P.A. Ref. 23/6056 and I note that for the purposes of calculating the required number of cycle parking spaces, it was anticipated that the proposed development would require 135 staff and approx. 90 new beds would be provided in the ward. On that basis, 32 no. bicycle parking spaces would be required and I note that these have been allocated to the permitted basement level car parking. On this basis, I am satisfied that both the existing permitted development and the proposed development will provide for substantial bicycle parking spaces once built. This is in accordance with the development plans minimum standards and is also consistent with objective TR O6 of the development plan.

#### Traffic Impact

8.4.12. In terms of traffic impact associated with the proposed development, I note that this was initially planned for as part of P.A. Ref. 23/60506. In this regard, Appendix D of the T&TIA provides this assessment and the MMP provides further analysis related to modal split, staff levels and staff travel.

8.4.13. A Stage 1 Road Safety Audit is submitted with the application details with specific reference to the proposed new shared path along the northern boundary of the UHL campus that will link the public footpath and cycle lane along St Nesson's road to the proposed new designated cycle parking area. The audit identified a number of issues with regard to the design and layout of the proposal and included recommendations to address the issues. The issues relate to shared path width, northbound cycle access, the lack of buffers along parking bays, unsafe pedestrian crossings.

8.4.14. In reviewing the T&TIA, I note that following the operation of the proposed development, the maximum increase in traffic volumes on the identified link roads is projected to be less than 3 %. In each of the scenarios presented, it is noted that the hospital entrance will be affected the most and will have an approx. increase of 7%. The increases as presented are not substantial and it is anticipated that as improvements to public transport and the provision of further public transport initiatives e.g. BusConnects Limerick program as identified in the LSMATS and other mobility

strategies are delivered over time, that this will lead to an expected reduction in car dependence. I note that the Transport Department and the Active Travel Department did not raise any objection to the proposed development as outlined in the T&TIA and the MMP. In this regard, while I acknowledge that the proposed development will increase traffic, I do not consider that this would warrant a refusal of permission in this case, having regard to the availability of public transportation in the area, the significant provision of bicycle parking proposed. I therefore consider that the proposed development is broadly in accordance with Section 11.8.3 of the development plan.

#### Construction Phase

- 8.4.15. Construction activity is ongoing at UHL in relation to Block A and this would be managed in accordance with the relevant Construction Management Plan strategies permitted as part of that development. I note that ground works related to Block B as per P.A. 23/60506 appear to also have commenced. In this regard I note condition 4 of P.A. Ref. 23/60506 was a pre-development condition in regard to the overall management of construction activity for this development. I note that this includes for a temporary traffic management system that will operate during construction phase. The Roads Department noted that this Construction Management Plan and Site Specific Temporary Traffic Management Plan which was approved under P.A. Ref. 23/60506 and in operation and was required to apply to the proposed development.
- 8.4.16. I have reviewed the Preliminary Construction Management Plan submitted with the application details which identifies temporary car parking for contractor workings. This is located on the site of the regional ambulance centre across the road from the hospital. It also outlines proposals for construction traffic management. I note that the PA and the Roads Department raised no objections to this plan. Therefore having regard to the foregoing and to the site history and I am satisfied that subject to a condition included with regard to a Construction Management Plan, similar to condition 3 and 6 imposed by the PA, that the management of construction activities and traffic can adequately be addressed. While I acknowledge that construction phase will likely discommode the public, it is however temporary in nature and will conclude once the project is completed. Should the Commission be minded to grant permission, I recommend the inclusion of a pre-development condition requiring the submission of a revised Construction Management Plan for the site.

## 8.5. Other Matters

### Conditions as per the PA's Grant

The following conditions were recommended to be included by the Active Travel Department in LCCC:

- Condition 7 is a pre-development condition. This relates to revised details to be submitted in terms of proposed showers and lockers to serve the staff changing rooms.
- Condition 8 requires revised projected modal splits for years 1, 3 and 5 in accordance with Section 3.2.2 of the Workplace Travel Plans.
- Condition 9 requires the submission of a monitoring report to ensure compliance with the Mobility Management Plan.

I note that it is an overall objective of the Council to implement Active Travel strategies for Limerick city and that the basis for the above conditions is to promote and provide incentives to encourage the use of sustainable modes of travel and to encourage modal changes to sustainable transport alternatives. In this regard, I consider it appropriate to include these conditions to achieve the strategic objectives of the council with regard to Active Travel and therefore recommend their inclusion, or similar.

- Condition 10 is a pre-development condition requiring the submission of proposals for swift nest boxes.

The council's Ecologist recommended a condition to be included in regard to the provision of swift nest boxes. It was identified that this breed of bird is present in the area and the design of the proposed development does not lend itself to providing available cavities that breeding birds could adapt for nesting. On that basis, I consider it appropriate that this condition is included, should the Commission decide to grant permission I recommend its inclusion.

### Future Development

It is indicated in the grounds of appeal that there are future proposals to provide a high-rise development on the site of the regional ambulance centre. I would note for the Commission that this is not a material planning consideration in the assessment

of the proposed development. Any future development proposals would be subject to public transparency as per the statutory requirements of the Planning and Development Act 2000 (as amended) and the Planning and Development Regulations 2001 (as amended) and in this case, the proposed development is assessed on its merits.

The appellant also makes reference to a lack of engagement with local residents and hospital management in the consideration of the impacts that the proposed development would have on nearby properties. I am satisfied that the planning application was received by the PA in accordance with the relevant statutory provisions of the Planning and Development Act 2000 (as amended) and the Planning and Development Regulations 2001 (as amended). At the outset, public consultation was invited by way of the statutory public notices. Other than by making a third party submission/observation to a planning application by way of the statutory mechanism to do so, this would be the only obligation on the applicant to facilitate public consultation, and I would note that other public consultation outside of this format would not be a requirement of planning within the statutory framework. In this regard, there is no further action required on behalf of the Commission.

## **9.0 AA Screening**

9.1. Refer to Appendix 3. In accordance with Section 177U of the Planning and Development Act 2000 (as amended) and on the basis of the information considered in this AA screening, I conclude that the proposed development individually or in combination with other plans or projects would not be likely to give rise to significant effects on the Lower River Shannon SAC (002165) and River Shannon & River Fergus SPA 004077 in view of the conservation objectives of this site, and is therefore excluded from further consideration. Appropriate Assessment is not required.

9.2. This determination is based on:

- Scientific information provided in the AA Screening report.
- The scale and nature of the proposed development on fully serviced lands and having regard to the site context;

- The distance from and weak indirect connection to the identified European Sites;
- No significant ex-situ impacts on wintering birds;
- Possible impacts identified would not be significant in terms of site-specific conservation objectives for the Lower River Shannon SAC site and would not undermine the maintenance of favourable conservation status;
- Taking into account the AA Screening determination by the PA.

9.3. No mitigation measures aimed at avoiding or reducing impacts on European sites were required to be considered in reaching this conclusion.

## 10.0 Water Framework Directive

10.1. Refer to Appendix 4. I conclude that on the basis of objective information, that the proposed development, subject to Standard Construction practice CEMP, will not result in a risk of deterioration on any water body (rivers, groundwaters, transitional and coastal) either qualitatively or quantitatively or on a temporary or permanent basis or otherwise jeopardies any water body in reaching its WFD objectives, and consequently can be excluded from further assessment.

## 11.0 Recommendation

I recommend that permission is granted, subject to conditions as set out below.

## 12.0 Reasons and Considerations

Having regard to the provisions of the Limerick City and County Development Plan 2022-2028, the land use zoning objective for the site, the planning history of the site in particular P.A. Ref. 23/60506, the nature, scale and design of the proposed development relative to the site context, the availability of public transport in the area and water and wastewater infrastructure, it is considered that subject to compliance with the conditions set out below, the proposed development would be in accordance with the zoning objective for the site, the objectives and policies of the development plan in particular objective ECON O17, SCSI O15 and CGR O9, would adequately



integrate with the existing adjoining development in terms of design, scale and finish, would not seriously injure the visual amenities of the area, would not unduly impact on the residential amenities of nearby properties, would not give rise to a traffic hazard, and would not detract from the existing protected structure on the hospital grounds. The proposed development, would, therefore be in accordance with the proper planning and sustainable development of the area.

## 13.0 Conditions

1.	<p>The development shall be carried out and completed in accordance with the plans and particulars lodged with the application, as received by the planning authority on the 26<sup>th</sup> day of March 2025, except as may otherwise be required in order to comply with the following conditions. Where such conditions require details to be agreed with the planning authority, the developer shall agree such details in writing with the planning authority prior to commencement of development and the development shall be carried out and completed in accordance with the agreed particulars.</p> <p><b>Reason:</b> In the interest of clarity.</p>
2.	<p>The developer shall provide swift nest boxes. Details in regard to the locations and design shall be submitted to the Planning Authority for written agreement, prior to commencement of development.</p> <p><b>Reason:</b> In the interest of nature conservation.</p>
3.	<p>The mitigation measures contained in the submitted Noise Impact Assessment shall be implemented.</p> <p><b>Reason:</b> To protect the residential amenities of nearby properties.</p>
4.	<p>Prior to the commencement of development, the developer shall submit revised drawings for the written agreement of the Planning Authority, which shall include details of showers and lockers within the staff changing rooms, to promote increased use of sustainable modes of travel.</p> <p><b>Reason:</b> In the interest of promoting sustainable travel</p>

5.	<p>The development shall be carried out and operated in accordance with the provisions of the Mobility Management Plan (MMP) submitted to the planning authority on 26<sup>th</sup> day of March 2025. The specific measures detailed in Section 5.3 and Section 6 Action Plan Summary of the MMP to achieve the objectives and modal split targets for the development shall be implemented in full upon first occupation of the development. The developer shall undertake an annual monitoring exercise to the satisfaction of the planning authority for the first 5 years following first occupation of the development, and shall submit the results to the planning authority for consideration and placement on the public file.</p> <p><b>Reason:</b> To achieve a reasonable modal split in transport and travel patterns in the interest of sustainable development.</p>
6.	<p>Prior to the commencement of development, the developer shall submit the following for the written agreement of the Planning Authority:</p> <p>a) The projected modal split for year 1, year 3 and year 5 shall be revised in the line with section 3.2.2 of Workplace Travel Plans – A Guide for Implementers and Achieving Effective Workplace Travel Plans – Guidance for Local Authorities.</p> <p><b>Reason:</b> In the interest of promoting sustainable travel</p>
7.	<p>Prior to the commencement of development the developer shall enter into a Connection Agreement(s) with Uisce Éireann (Irish Water) to provide for a service connection(s) to the public water supply and/or wastewater collection network.</p> <p><b>Reason:</b> In the interest of public health and to ensure adequate water/wastewater facilities.</p>
8.	<p>Site development and building works shall be carried out between the hours of 8:00 a.m. to 8:00 p.m. Mondays to Fridays inclusive, between 8:00 a.m. to 4:00 p.m. on Saturdays and not at all on Sundays and public holidays. Deviation from these times shall only be allowed in exceptional circumstances where prior written agreement has been received from the</p>

	<p>planning authority.</p> <p><b>Reason:</b> To safeguard the amenity of property in the vicinity.</p>
9.	<p>The construction of the development shall be managed in accordance with a Construction Management Plan, which shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. This plan shall provide details of intended construction practice for the development, including:</p> <ul style="list-style-type: none"> <li>(a) Location of the site and materials compound(s) including area(s) identified for the storage of construction refuse;</li> <li>(b) Location of areas for construction site offices and staff facilities;</li> <li>(c) Details of site security fencing and hoardings;</li> <li>(d) Details of on-site car parking facilities for site workers during the course of construction;</li> <li>(e) Details of the timing and routing of construction traffic to and from the construction site and associated directional signage, to include proposals to facilitate the delivery of abnormal loads to the site;</li> <li>(f) Measures to obviate queuing of construction traffic on the adjoining road network;</li> <li>(g) Measures to prevent the spillage or deposit of clay, rubble or other debris on the public road network;</li> <li>(h) Alternative arrangements to be put in place for pedestrians and vehicles in the case of the closure of any public road or footpath during the course of site development works;</li> <li>(i) Details of appropriate mitigation measures for noise, dust and vibration, and monitoring of such levels;</li> <li>(j) Containment of all construction-related fuel and oil within specially constructed bunds to ensure that fuel spillages are fully contained. Such bunds shall be roofed to exclude rainwater;</li> <li>(k) Off-site disposal of construction/demolition waste and details of how it is proposed to manage excavated soil;</li> </ul>

	<p>(l) Means to ensure that surface water run-off is controlled such that no silt or other pollutants enter local surface water sewers or drains.</p> <p>(m) A record of daily checks that the works are being undertaken in accordance with the Construction Management Plan shall be available for inspection by the planning authority;</p> <p><b>Reason:</b> In the interest of amenities, public health and safety and environmental protection</p>
10.	<p>A plan containing details for the management of waste in particular, clinical waste, non-clinical waste and recyclable materials within the development, including the provision of facilities for the storage, separation and collection of the waste and, in particular, recyclable materials shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. Thereafter, the agreed waste facilities shall be maintained and waste shall be managed in accordance with the agreed plan.</p> <p><b>Reason:</b> To provide for the appropriate management of waste and, in particular recyclable materials, in the interest of protecting the environment and the amenities of properties in the vicinity.</p>
11.	<p>The landscaping plan scheme as submitted to the planning authority on the 26<sup>th</sup> day of March, 2025 shall be carried out within the first planting season following substantial completion of external construction works.</p> <p>All planting shall be adequately protected from damage until established. Any plants which die, are removed or become seriously damaged or diseased, within a period of five years from the completion of the development or shall be replaced within the next planting season with others of similar size and species, unless otherwise agreed in writing with the planning authority.</p> <p><b>Reason:</b> In the interest of residential and visual amenity.</p>

12.	<p>The disposal of surface water shall comply with the requirements of the planning authority for such works and services. Prior to the commencement of development, the developer shall submit details for the disposal of surface water from the site for the written agreement of the planning authority.</p> <p><b>Reason:</b> To prevent flooding and in the interests of sustainable drainage.</p>
13.	<p>The developer shall pay to the planning authority a financial contribution in respect of public infrastructure and facilities benefiting development in the area of the planning authority that is provided or intended to be provided by or on behalf of the authority in accordance with the terms of the Development Contribution Scheme made under section 48 of the Planning and Development Act 2000, as amended. The contribution shall be paid prior to commencement of development or in such phased payments as the planning authority may facilitate and shall be subject to any applicable indexation provisions of the Scheme at the time of payment. Details of the application of the terms of the Scheme shall be agreed between the planning authority and the developer or, in default of such agreement, the matter shall be referred to An Coimisiún Pleanála to determine the proper application of the terms of the Scheme.</p> <p><b>Reason:</b> It is a requirement of the Planning and Development Act 2000, as amended, that a condition requiring a contribution in accordance with the Development Contribution Scheme made under section 48 of the Act be applied to the permission.</p>

I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence, directly or indirectly, the exercise of my professional judgement in an improper or inappropriate way.

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Clare Clancy  
Planning Inspector

09<sup>th</sup> September 2025

## Appendix 1 – Form 1 - EIA Pre-Screening

<b>Case Reference</b>	ABP 322678-25
<b>Proposed Development Summary</b>	To extend the permitted 'shell' extension to the north of the existing Emergency Department (ED) and Renal Department (RD) P.A. Ref. 23/60506 which comprises of a 96 no. single-bed acute ward over four floor levels (level 03 to level 06) double basement car parking (levels -01 and -02), two levels of medical floor space (levels 0 and 1) with stairwells, lift access and circulation areas at roof level (level 02), and ancillary site development works. It is proposed to carry out alterations to the permitted 'shell' granted under P.A. Ref. 23/6050 as described in Section 2.5 above. The provision of significant bicycle parking and shelters. Protected Structure on site Hospital Chapel RPS Reg. No. 1649.
<b>Development Address</b>	University Hospital Limerick, St. Nessian's Road, Dooradoyle, Limerick
	<b>In all cases check box /or leave blank</b>
<b>1. Does the proposed development come within the definition of a 'project' for the purposes of EIA?</b>  (For the purposes of the Directive, "Project" means: - The execution of construction works or of other installations or schemes,  - Other interventions in the natural surroundings and landscape including those involving the extraction of mineral resources)	<input checked="" type="checkbox"/> Yes, it is a 'Project'. Proceed to Q2.  <input type="checkbox"/> No, No further action required.
<b>2. Is the proposed development of a CLASS specified in Part 1, Schedule 5 of the Planning and Development Regulations 2001 (as amended)?</b>	
<input type="checkbox"/> Yes, it is a Class specified in Part 1.  <b>EIA is mandatory. No Screening required. EIAR to be requested. Discuss with ADP.</b>	State the Class here

<input checked="" type="checkbox"/> No, it is not a Class specified in Part 1. Proceed to Q3	
<b>3. Is the proposed development of a CLASS specified in Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) OR a prescribed type of proposed road development under Article 8 of Roads Regulations 1994, AND does it meet/exceed the thresholds?</b>	
<input checked="" type="checkbox"/> No, the development is not of a Class Specified in Part 2, Schedule 5 or a prescribed type of proposed road development under Article 8 of the Roads Regulations, 1994.  <b>No Screening required.</b>	
<input type="checkbox"/> Yes, the proposed development is of a Class and meets/exceeds the threshold.  <b>EIA is Mandatory. No Screening Required</b>	<b>State the Class and state the relevant threshold</b>
<input checked="" type="checkbox"/> Yes, the proposed development is of a Class but is sub-threshold.  <b>Preliminary examination required. (Form 2)</b>  <b>OR</b>  <b>If Schedule 7A information submitted proceed to Q4. (Form 3 Required)</b>	<b>State the Class and state the relevant threshold</b>  Class 10(b)(iv)  Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere. (In this paragraph, "business district" means a district within a city or town in which the predominant land use is retail or commercial use.)

<b>4. Has Schedule 7A information been submitted AND is the development a Class of Development for the purposes of the EIA Directive (as identified in Q3)?</b>	
Yes <input checked="" type="checkbox"/>	<b>Screening Determination required (Complete Form 3)</b>
No <input type="checkbox"/>	



**Inspector:** \_\_\_\_\_ **Date:** \_\_\_\_\_



## Appendix 2 – Form 3 - EIA Screening Determination

A. CASE DETAILS		
<b>An Bord Pleanála Case Reference</b>	<b>ABP-322678-25</b>	
<b>Development Summary</b>	<p>To extend the permitted 'shell' extension to the north of the existing Emergency Department (ED) and Renal Department (RD) P.A. Ref. 23/60506 which comprises of a 96 no. single-bed acute ward over four floor levels (level 03 to level 06) double basement car parking (levels -01 and -02), two levels of medical floor space (levels 0 and 1) with stairwells, lift access and circulation areas at roof level (level 02), and ancillary site development works. It is proposed to carry out alterations to the permitted 'shell' granted under P.A. Ref. 23/6050 as described in Section 2.5 above. The provision of significant bicycle parking and shelters. Protected Structure on site Hospital Chapel RPS Reg. No. 1649.</p>	
	<b>Yes / No / N/A</b>	<b>Comment (if relevant)</b>
<b>1. Was a Screening Determination carried out by the PA?</b>	Yes	The determination made concluded that no real likelihood of significant effects on the environment. EIAR not required.
<b>2. Has Schedule 7A information been submitted?</b>	Yes	EIA Screening report submitted. This concluded that the project does not exceed a threshold in Part 1, Schedule 5 of the Planning and Development Regulations 2001 (as amended).
<b>3. Has an AA screening report or NIS been submitted?</b>	Yes	Stage 1 Screening for Appropriate Assessment submitted.

4. Is a IED/ IPC or Waste Licence (or review of licence) required from the EPA? If YES has the EPA commented on the need for an EIAR?	No		
5. Have any other relevant assessments of the effects on the environment which have a significant bearing on the project been carried out pursuant to other relevant Directives – for example SEA	N/A	The Limerick City and County Development Plan 2022-2028 has been subject to SEA Screening.	
<b>B. EXAMINATION</b>	<b>Yes/ No/ Uncertain</b>	<b>Briefly describe the nature and extent and Mitigation Measures (where relevant)</b>  (having regard to the probability, magnitude (including population size affected), complexity, duration, frequency, intensity, and reversibility of impact)  <b>Mitigation measures</b> –Where relevant specify features or measures proposed by the applicant to avoid or prevent a significant effect.	<b>Is this likely to result in significant effects on the environment?</b>  <b>Yes/ No/ Uncertain</b>
<b>This screening examination should be read with, and in light of, the rest of the Inspector's Report attached herewith</b>			
<b>1. Characteristics of proposed development</b> (including demolition, construction, operation, or decommissioning)			
1.1 Is the project significantly different in character or scale to the existing surrounding or environment?	No	The development comprises the extension of an already permitted development P.A. Ref. 23/60506. This development relates to the construction of a 'shell' extension comprising 2 no. levels of medical floor space, 2 no.	No

		<p>levels basement car parking (total levels 2 above ground, 2 below ground).</p> <p>The subject development comprises the construction of 96 no. bed ward and ancillary spaces resulting in 7 no. levels above ground level, with an overall height of c. 37 m above ground level, and a gross floor area of be approx. 10,514 m<sup>2</sup>, on the footprint of the above mentioned development. It is proposed to carry out alterations to the permitted 'shell' granted under P.A. Ref. 23/6050 as described in Section 2.5 above of the main report.</p> <p>The proposed extension occurs within the footprint of the existing hospital campus which has an overall area of 17.13 ha and is not out of character or scale with previously permitted on the site.</p>	
<p><b>1.2</b> Will construction, operation, decommissioning or demolition works cause physical changes to the locality (topography, land use, waterbodies)?</p>	No	<p>No demolition works are proposed. Permission was granted under P.A. Ref. 20/775 for a 96 no. bed ward which abuts the site to the south and which is under construction (Block A).</p> <p>The site is zoned '<i>education and community infrastructure</i>' and comprises of a regional hospital campus in an urban area and is serviced by public water and wastewater infrastructure.</p>	No

		The extent of the works the subject of this application are localised and are not significant in the context of the wider area.	
<b>1.3</b> Will construction or operation of the project use natural resources such as land, soil, water, materials/minerals or energy, especially resources which are non-renewable or in short supply?	Yes	<p>Construction materials used for the proposed development are typical for such building developments. The loss of natural resources as a result of the proposed development are not considered to be significant in nature. The site is already development and therefore there is no further loss to land. The site is service by public water mains. No objection to the proposed development arose with Uisce Éireann.</p> <p>Operational demands are associated with the existing use of the site.</p>	No
<b>1.4</b> Will the project involve the use, storage, transport, handling or production of substance which would be harmful to human health or the environment?	Yes	<p>Construction waste arising from the proposed development and construction activities will be managed in accordance with a Resource and Waste Management Plan (RWMP). Standard procedures and operational measures are set out in the RWMP to manage waste during construction phase.</p> <p>Given the use of the site and outside of general waste categories such as dry mixed recycling, organic waste and general waste, healthcare waste including hazardous clinical waste is identified as a risk. Once operational, such waste will be separated from general waste and managed in accordance with the Operational Waste Management Plan (OWMP) for the proposed development and will be stored at the existing central waste storage area within the hospital campus and</p>	No

		will be moved off site by licenced waste collection services.	
<b>1.5</b> Will the project produce solid waste, release pollutants or any hazardous / toxic / noxious substances?	Yes	<p>The construction phase would require the use of potentially harmful materials e.g. fuels, oils, paint, glue or other similar substances giving rise to solid waste for disposal. The use of such materials would be typical for a construction site. Construction phase would be short term duration so significant and extended construction noise and dust impacts would be unlikely and temporary in nature.</p> <p>It is not anticipated that significant operational emissions will be generated outside of that already associated with the overall site. Storm water run-off will be managed by SuDS and discharge to the public foul sewer. Wastewater will discharge to the public sewer. Other operational emissions are not anticipated to be significant.</p> <p>Clinical waste generated from the operation of the development will be managed and disposed of in accordance with the OWMP for the proposed development.</p>	No
<b>1.6</b> Will the project lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, groundwater, coastal waters or the sea?	No	<p>The construction activities associated within the development will take place within the footprint of the existing hospital campus. This will be temporary in nature and of limited duration. Emission arising will be limited and managed in accordance with the RWMP.</p> <p>It is not anticipated that the proposed development would give rise to significant emissions or contaminants during operational phase. Wastewater will discharge</p>	No

		to the public sewer, and surface water management will discharge to the public storm sewer.	
<b>1.7</b> Will the project cause noise and vibration or release of light, heat, energy or electromagnetic radiation?	No	<p>No significant source of vibration is expected during construction as ground works have been completed.</p> <p>Emissions will inevitably arise from construction activities that would include noise, dust, construction traffic however will be confined to the day time hours of operation and will be temporary in nature with no significant effects. The closest off-site residential sensitive locations are 110 m and 115 m to the west of the site. Operational noise will relate to the operation of plant (air handling units) fitted to the external environment. No significant noise emissions will arise and will not exceed acceptable standards, having regard to the Noise Impact Assessment.</p> <p>Traffic emissions may have a localised effect.</p>	No
<b>1.8</b> Will there be any risks to human health, for example due to water contamination or air pollution?	No	No risks to human health are likely and no significant operational impacts are anticipated. The site will be managed in accordance with a CEMP, RWMP and OWMP.	No
<b>1.9</b> Will there be any risk of major accidents that could affect human health or the environment?	No	<p>Having regard to the nature of the proposed development within the existing hospital campus, no significant risks are anticipated.</p> <p>No Seveso/COMAH are noted to be in the vicinity.</p>	No



		Measures to manage surface water run-off are included in the overall development. It is unlikely that the proposed development would increase risk to flooding.		
<b>1.10</b> Will the project affect the social environment (population, employment)	Yes	The proposed development will provide jobs for the locality and wider region. No negative social environmental impacts are anticipated.	No	
<b>1.11</b> Is the project part of a wider large scale change that could result in cumulative effects on the environment?	No	The development is associated with providing on-going social infrastructure that is compatible with the existing use of the site to provide increased medical services to serve the wider area.	No	
<b>2. Location of proposed development</b>				
<b>2.1</b> Is the proposed development located on, in, adjoining or have the potential to impact on any of the following: - European site (SAC/ SPA/ pSAC/ pSPA) - NHA/ pNHA - Designated Nature Reserve - Designated refuge for flora or fauna - Place, site or feature of ecological interest, the preservation/conservation/ protection of which is an objective of a development plan/ LAP/ draft plan or variation of a plan	Yes	<b>Site</b>	<b>Location</b>	No
		Lower River Shannon SAC 002165	c. 1.2 km to the north	
		River Shannon & River Fergus SPA 004077	c. 1.8 km	
		pNHA Inner Shannon Estuary South Shore 000435	c. 1.6 km to northeast	
		pNHA Loughmore Common Turlough 000438	c. 1.4 km to southwest	

		<p>The conservation objectives for the reference sites relate to breeding and wintering birds and coastal habitats.</p> <p>An Appropriate Assessment Screening was provided in support of the application. This concluded that the proposed development will not undermine the conservation objectives of the European sites, and there will not be any significant adverse effects on any European designated sites.</p>	
<b>2.2</b> Could any protected, important or sensitive species of flora or fauna which use areas on or around the site, for example: for breeding, nesting, foraging, resting, over-wintering, or migration, be affected by the project?	No	<p>The appeal site is located in an urban area and the proposed development will take place within the existing hospital campus.</p> <p>There is no loss to or encroachment of sensitive habitats.</p> <p>The wintering and breeding birds identified from the conservation objectives would feed, roost, breed on intertidal habitats. Significant effects of roosting or foraging activity are not considered likely.</p>	No
<b>2.3</b> Are there any other features of landscape, historic, archaeological, or cultural importance that could be affected?	No	<p>The existing Church is located adjacent to the main entrance to the hospital is a designated protected structure RPS Reg. No. 1649 Hospital Chapel and form. The proposed development will take place to the south of the Church (approx. 100 m) and outside of the its immediate setting. It is also visually separated by the western wing of the existing hospital.</p>	No

		The extent of the development and impacts on landscape and visual amenity are localised and not extensive.	
<b>2.4</b> Are there any areas on/around the location which contain important, high quality or scarce resources which could be affected by the project, for example: forestry, agriculture, water/coastal, fisheries, minerals?	No		No
<b>2.5</b> Are there any water resources including surface waters, for example: rivers, lakes/ponds, coastal or groundwaters which could be affected by the project, particularly in terms of their volume and flood risk?	No	The proposed development is not within identified flood zones.  The development will implement measures to control surface water run-off. The development is unlikely to result in increased risk of flooding to downstream areas.	No
<b>2.6</b> Is the location susceptible to subsidence, landslides or erosion?	No		No
<b>2.7</b> Are there any key transport routes(eg National primary Roads) on or around the location which are susceptible to congestion or which cause environmental problems, which could be affected by the project?	Yes	The existing access serving the main hospital campus is off the adjoining R526 St Nesson's road from the city linking with the M20 which is heavily trafficked and encounters traffic congestion.  The proposed development will give rise to increased traffic levels, however the Traffic and Transport Assessment concluded that the proposed development would be negligible on the surrounding road network during construction and operational phase.  There are 2 off-site park and ride car facilities for hospital staff with a shuttle bus service in	No

		<p>place that provides transport for staff coinciding with work shifts.</p> <p>The St Paul's / Ballykeefe Active Travel scheme is due to commence construction in the area providing part of the primary radial route identified in the LSMATS from the city centre to Mungret.</p> <p>Significant bicycle parking (144 spaces) is proposed in 6 locations throughout the campus, some proposed in basement car park.</p> <p>The area is serviced by good quality public transport, high capacity and frequent service and bus stops are located immediately outside the housing entrance. Limerick train station is located 5 km to the north.</p>	
<b>2.8</b> Are there existing sensitive land uses or community facilities (such as hospitals, schools etc) which could be affected by the project?	No	<p>The overall site is a long established hospital campus.</p> <p>The area is characterised by residential, commercial and retail developments and public amenity areas. Post construction stage, no impacts are anticipated at operational stage.</p>	No
<b>3. Any other factors that should be considered which could lead to environmental impacts</b>			
<b>3.1 Cumulative Effects:</b> Could this project together with existing and/or approved development result in cumulative effects during the construction/ operation phase?	Yes	<p>The existing permitted development on the site is currently under construction. Potential for cumulative impacts may arise such as noise, dust, traffic. Any cumulative traffic impacts that may arise during construction would be subject to a project construction traffic management plan and CEMP.</p>	No

<b>3.2 Transboundary Effects:</b> Is the project likely to lead to transboundary effects?	No	No transboundary considerations arise.	No
<b>3.3</b> Are there any other relevant considerations?	No		No
<b>C. CONCLUSION</b>			
<b>No real likelihood of significant effects on the environment.</b>	✓	EIAR Not Required	
<b>Real likelihood of significant effects on the environment.</b>	<input type="checkbox"/>	EIAR Required	
<b>D. MAIN REASONS AND CONSIDERATIONS</b>			
<b><i>EG - EIAR <u>not</u> Required</i></b>			
Having regard to: -			
1. The criteria set out in Schedule 7, in particular <ol style="list-style-type: none"> <li>The nature and scale of the proposed development which is below the threshold in respect of class 10(b)(iv) of Part 2, Schedule 5 of the Planning and Development Regulations 2001 (as amended), and which will occur on the footprint of the previously permitted development P.A. 23/60506 within the existing site context serviced by public infrastructure,</li> <li>The nature of the existing site context i.e. the established University Hospital Campus,</li> <li>The nature of the development and the provisions Policy Objective 23 of the Limerick-Shannon MASP and Objectives ECON 017 and SCS1 015 of the Limerick City and County Development Plan 2022-2028 which seek to support and facilitate expansion of UHL and HSE services,</li> <li>The availability of existing public water and wastewater infrastructure to serve the development,</li> <li>The absence of any significant environmental sensitivity in the vicinity,</li> <li>The location of the development outside of any sensitive location specified in article 109(4)(a) of the Planning and Development Regulations 2001 (as amended)</li> </ol>			

2. The results of other relevant assessments of the effects on the environment submitted by the applicant i.e. An Appropriate Assessment Screening, Noise Impact Assessment, Resource and Waste Management Plan and Operational Waste Management Plan for the proposed development, Schedule 7A information provided in support of the application,
3. The features and measures proposed by the applicant envisaged to avoid or prevent what might otherwise have been significant effects on the environment.

The Commission concluded that the proposed development would not be likely to have significant effects on the environment, and that an environmental impact assessment report is not required.

Inspector \_\_\_\_\_

Date \_\_\_\_\_

Approved (DP/ADP) \_\_\_\_\_

Date \_\_\_\_\_

## Appendix 3 – Appropriate Assessment Screening

Screening for Appropriate Assessment Test for likely significant effects	
<b>Step 1: Description of the project and local site characteristics</b>	
<b>Case File ABP-322678-25</b>	
<b>Brief description of project</b>	<p>To extend the permitted 'shell' extension to the north of the existing Emergency Department (ED) and Renal Department (RD) P.A. Ref. 23/60506 which comprises of a 96 no. single-bed acute ward over four floor levels (level 03 to level 06) double basement car parking (levels -01 and -02), two levels of medical floor space (levels 0 and 1) with stairwells, lift access and circulation areas at roof level (level 02), and ancillary site development works. It is proposed to carry out alterations to the permitted 'shell' granted under P.A. Ref. 23/6050 as described in Section 2.5 above.</p> <p>The provision of significant bicycle parking and shelters. Protected Structure on site Hospital Chapel RPS Reg. No. 1649.</p>
<b>Brief description of development site characteristics and potential impact mechanisms</b>	<p>Located on UHL campus. Site area related to appeal site stated as 0.406 ha and total gross floor area for proposed works approx. 10,514 m<sup>2</sup>.</p> <p>The appeal site is not located within a European designated site however the closest sites are the following:</p> <ul style="list-style-type: none"> <li>• Lower River Shannon SAC 002165 – c. 1.2 km to the north</li> <li>• River Shannon &amp; River Fergus SPA 004077 – c. 1.8 km to the north</li> </ul> <p>Key issues identified – discharge of surface waters via hydrological connection i.e. groundwater linking to the identified sites.</p>
<b>Screening report</b>	<p>Yes (Coiscéim Consulting)</p> <p>Limerick City &amp; County Council screened out the need for AA.</p>
<b>Natura Impact Statement</b>	No
<b>Relevant submissions</b>	No issues raised.
<b>Step 2. Identification of relevant European Sites using Source-pathway-receptor model</b>	

European Site (code)	Qualifying interests <sup>1</sup> Link to conservation objectives (NPWS, date)	Distance from proposed development (km)	Ecological connections <sup>2</sup>	Consider further in screening <sup>3</sup> Y/N
Lower River Shannon SAC (002165)	<ul style="list-style-type: none"> <li>• Estuaries [1130]</li> <li>• Mudflats and sandflats not covered by seawater at low tide [1140]</li> <li>• Coastal lagoons [1150]</li> <li>• Large shallow inlets and bays [1160]</li> <li>• Reefs [1170]</li> <li>• Perennial vegetation of stony banks [1220]</li> <li>• Vegetated sea cliffs of the Atlantic and Baltic coasts [1230]</li> <li>• Salicornia and other annuals colonising mud and sand [1310]</li> <li>• Atlantic salt meadows (Glauco-Puccinellietalia maritimae) [1330]</li> <li>• Mediterranean salt meadows (Juncetalia maritima) [1410]</li> <li>• Water courses of plain to montane levels with the Ranunculion fluitantis and Callitriche-Batrachion vegetation [3260]</li> </ul>	Approx. 1.2 km to north	No direct connection,  Potential weak indirect	Yes



	<ul style="list-style-type: none"> <li>• <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>) [6410]</li> <li>• Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i>, <i>Alnion incanae</i>, <i>Salicion albae</i>) [91E0]</li> <li>• <i>Margaritifera margaritifera</i> (Freshwater Pearl Mussel) [1029]</li> <li>• <i>Petromyzon marinus</i> (Sea Lamprey) [1095]</li> <li>• <i>Lampetra planeri</i> (Brook Lamprey) [1096]</li> <li>• <i>Lampetra fluviatilis</i> (River Lamprey) [1099]</li> <li>• <i>Salmo salar</i> (Salmon) [1106]</li> <li>• <i>Tursiops truncatus</i> (Common Bottlenose Dolphin) [1349]</li> <li>• <i>Lutra lutra</i> (Otter) [1355]</li> </ul>			
River Shannon and River Fergus Estuaries SPA (004077)	<ul style="list-style-type: none"> <li>• Cormorant (<i>Phalacrocorax carbo</i>) [A017]</li> <li>• Whooper Swan (<i>Cygnus cygnus</i>) [A038]</li> </ul>	4.08 km	<p>No direct connection</p> <p>Possible weak indirect connection</p>	No

	<ul style="list-style-type: none"> <li>• Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046]</li> <li>• Shelduck (<i>Tadorna tadorna</i>) [A048]</li> <li>• Wigeon (<i>Anas penelope</i>) [A050]</li> <li>• Teal (<i>Anas crecca</i>) [A052]</li> <li>• Pintail (<i>Anas acuta</i>) [A054]</li> <li>• Shoveler (<i>Anas clypeata</i>) [A056]</li> <li>• Scaup (<i>Aythya marila</i>) [A062]</li> <li>• Ringed Plover (<i>Charadrius hiaticula</i>) [A137]</li> <li>• Golden Plover (<i>Pluvialis apricaria</i>) [A140]</li> <li>• Grey Plover (<i>Pluvialis squatarola</i>) [A141]</li> <li>• Lapwing (<i>Vanellus vanellus</i>) [A142]</li> <li>• Knot (<i>Calidris canutus</i>) [A143]</li> <li>• Dunlin (<i>Calidris alpina</i>) [A149]</li> <li>• Black-tailed Godwit (<i>Limosa limosa</i>) [A156]</li> <li>• Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157]</li> <li>• Curlew (<i>Numenius arquata</i>) [A160]</li> <li>• Redshank (<i>Tringa totanus</i>) [A162]</li> </ul>			
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	<ul style="list-style-type: none"> <li>• Greenshank (Tringa nebularia) [A164]</li> <li>• Black-headed Gull (Chroicocephalus ridibundus) [A179]</li> <li>• Wetland and Waterbirds [A999]</li> </ul>			
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- Based on source-pathway-receptor: there is a weak indirect via surface water to ground water to Lower River Shannon SAC (002165)
- Based on source-pathway-receptor, there is a weak indirect connection between the appeal site and the River Shannon and River Fergus Estuaries SPA (004077).

### Further Commentary / Discussion

Due to the nature of the proposed development which is on the footprint of a previously permitted development, and to the enclosed nature of the development site which is fully serviced and in the context of the urban environment whereby the presence of a significant buffer between the appeal site and the River Shannon, I consider that the proposed development would not be expected to generate impacts that could affect anything but the immediate area of the development site, thus having a very limited potential zone of influence on any ecological receptors.

### Step 3. Describe the likely effects of the project (if any, alone or in combination) on European Sites

#### AA Screening Matrix

Site Name	Possibility of significant effects (alone) in view of the conservation objectives of the site*	
Site	Impacts	Effects
Lower River Shannon SAC (002165) <ul style="list-style-type: none"> <li>• Sandbanks which are slightly covered by sea water all the time [1110]</li> <li>• Estuaries [1130]</li> <li>• Mudflats and sandflats not covered by seawater at low tide [1140]</li> </ul>	<b>Direct:</b> None  <b>Indirect:</b> Arising from construction phase and operational phase, emissions to surface water and groundwater.	Low risk of surface water borne pollutants reaching the SAC thereby diminishing water/water quality at construction and operational stage via stormwater drainage system discharging to groundwater.  It is noted that the proposed development will occur on the footprint of a previously permitted development P.A. 23/60506 which includes for

<ul style="list-style-type: none"> <li>• Coastal lagoons [1150]</li> <li>• Large shallow inlets and bays [1160]</li> <li>• Reefs [1170]</li> <li>• Perennial vegetation of stony banks [1220]</li> <li>• Vegetated sea cliffs of the Atlantic and Baltic coasts [1230]</li> <li>• Salicornia and other annuals colonising mud and sand [1310]</li> <li>• Atlantic salt meadows (<i>Glaucopuccinellietalia maritimae</i>) [1330]</li> <li>• Mediterranean salt meadows (<i>Juncetalia maritima</i>) [1410]</li> <li>• Water courses of plain to montane levels with the <i>Ranunculion fluitantis</i> and <i>Callitriche-Batrachion</i> vegetation [3260]</li> <li>• <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>) [6410]</li> <li>• Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i>, <i>Alnion incanae</i>, <i>Salicion albae</i>) [91E0]</li> <li>• <i>Margaritifera margaritifera</i></li> </ul>		<p>basement car parking. This permission has commenced.</p> <p>The proposed discharge proposals for surface waters associated with the appeal site will comprise green infrastructure (green roofs, swales, raised planted areas, green roofs, bio-retention systems, and permeable paving) for interception, conveyance and storage of surface water run-off. Discharge to drainage gullies through petrol interceptors at basement level followed by pumping to the foul outfall manhole at ground level onto St Nesson's Road.</p> <p>The contained nature of the site (serviced, defined site boundaries, no direct ecological connections or pathways) and distance from receiving features connected to the SAC make it is highly unlikely that the proposed development could generate impacts of a magnitude that could affect habitat quality within the SAC for the Qis listed.</p> <p>Conservation objectives would not be undermined.</p>
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(Freshwater Pearl Mussel) [1029] <ul style="list-style-type: none"><li>• Petromyzon marinus (Sea Lamprey) [1095]</li><li>• Lampetra planeri (Brook Lamprey) [1096]</li><li>• Lampetra fluviatilis (River Lamprey) [1099]</li><li>• Salmo salar (Salmon) [1106]</li><li>• Tursiops truncatus (Common Bottlenose Dolphin) [1349]</li><li>• Lutra lutra (Otter) [1355]</li></ul>		
	<b>Likelihood of significant effects from the proposed development (alone):</b> No	
	<b>If No, is there likelihood of significant effects occurring in combination with other plans or projects?</b> No	
<b>Further Commentary / discussion (only where necessary)</b> None		
<b>Site name</b> <b>Qualifying interests</b>	<b>Possibility of significant effects (alone) in view of the conservation objectives of the site*</b>	
<b>Site</b>	<b>Impacts</b>	<b>Effects</b>
River Shannon and River Fergus Estuaries SPA (004077) <ul style="list-style-type: none"><li>• Cormorant (Phalacrocorax carbo) [A017]</li><li>• Whooper Swan (Cygnus cygnus) [A038]</li><li>• Light-bellied Brent Goose (Branta</li></ul>	Direct: None  Indirect: Weak potential Localised, temporary, low magnitude impacts from noise, dust and construction related emissions to surface water during construction.	The contained nature of the site (serviced, defined site boundaries, no direct ecological connections or pathways) and distance from receiving features connected to the SPA make it is highly unlikely that the proposed development could generate impacts of a magnitude that could affect habitat quality within the SPA for the SCI listed.

<p>bernicla hrota) [A046]</p> <ul style="list-style-type: none"> <li>• Shelduck (Tadorna tadorna) [A048]</li> <li>• Wigeon (Anas penelope) [A050]</li> <li>• Teal (Anas crecca) [A052]</li> <li>• Pintail (Anas acuta) [A054]</li> <li>• Shoveler (Anas clypeata) [A056]</li> <li>• Scaup (Aythya marila) [A062]</li> <li>• Ringed Plover (Charadrius hiaticula) [A137]</li> <li>• Golden Plover (Pluvialis apricaria) [A140]</li> <li>• Grey Plover (Pluvialis squatarola) [A141]</li> <li>• Lapwing (Vanellus vanellus) [A142]</li> <li>• Knot (Calidris canutus) [A143]</li> <li>• Dunlin (Calidris alpina) [A149]</li> <li>• Black-tailed Godwit (Limosa limosa) [A156]</li> <li>• Bar-tailed Godwit (Limosa lapponica) [A157]</li> <li>• Curlew (Numenius arquata) [A160]</li> <li>• Redshank (Tringa totanus) [A162]</li> <li>• Greenshank (Tringa nebularia) [A164]</li> </ul>		<p>No direct habitat loss due to distance between the proposed site and the SPA site.</p> <p>Conservation objectives and qualifying interests would not be undermined.</p>
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<ul style="list-style-type: none"><li>• Black-headed Gull (Chroicocephalus ridibundus) [A179]</li><li>• Wetland and Waterbirds [A999]</li></ul>		
	<b>Likelihood of significant effects from proposed development (alone):</b> No	
	<b>If No, is there likelihood of significant effects occurring in combination with other plans or projects?</b> No	
<b>Further Commentary / discussion (only where necessary)</b> None		
<b>Step 4 Conclude if the proposed development could result in likely significant effects on a European site</b>		
<p>I conclude that the proposed development (alone or in combination with other plans and projects) would not result in likely significant effects on a European Site.</p> <p>No mitigation measures are required to come to these conclusions. I consider the provision of petrol / oil interceptors are a standard measure to prevent ingress of water pollutants and is not a mitigation measure for the purpose of avoiding or preventing impacts to the SAC or SPA.</p>		
<b>Screening Determination</b>  <b>Finding of no likely significant effects</b> In accordance with Section 177U of the Planning and Development Act 2000 (as amended) and on the basis of the information considered in this AA screening, I conclude that the proposed development individually or in combination with other plans or projects would not be likely to give rise to significant effects on the Lower River Shannon SAC (002165) or River Shannon and River Fergus Estuaries SPA (004077) in view of the Conservation Objectives for the sites, and is therefore excluded from further consideration. Appropriate Assessment is not required.  This determination is based on: <ul style="list-style-type: none"><li>• Scientific information provided in the AA Screening report.</li><li>• The scale and nature of the proposed development on fully serviced lands and having regard to the site context.</li><li>• The distance from and weak indirect connection to the identified European Sites;</li><li>• No significant ex-situ impacts on wintering birds;</li></ul>		

- Possible impacts identified would not be significant in terms of site-specific conservation objectives for the Lower River Shannon SAC site and would not undermine the maintenance of favourable conservation status;
- Taking into account the AA Screening determination by the PA.

No mitigation measures aimed at avoiding or reducing impacts on European sites were required to be considered in reaching this conclusion.



## Appendix 4 – WFD Impact Assessment Stage 1

WFD IMPACT ASSESSMENT STAGE 1: SCREENING			
Step 1: Nature of the Project, the Site and Locality			
An Bord Pleanála ref. no.	ABP-322678-25	Townland, address	University Hospital Limerick, St. Nessel's Road, Dooradoyle, Limerick
Description of project		<p>To extend the permitted 'shell' extension to the north of the existing Emergency Department (ED) and Renal Department (RD) P.A. Ref. 23/60506 which comprises of a 96 no. single-bed acute ward over four floor levels (level 03 to level 06) double basement car parking (levels -01 and -02), two levels of medical floor space (levels 0 and 1) with stairwells, lift access and circulation areas at roof level (level 02), and ancillary site development works. The provision of significant bicycle parking and shelters.</p> <p>The development comprises a vertical extension of an already permitted development P.A. Ref. 23/60506 providing for 7 no. levels above ground level to facilitate a 96 bed acute ward, and ancillary medical space an overall height of c. 37 m above ground level, and a gross floor area of be approx. 10,514 m<sup>2</sup>, on the footprint of the above mentioned development. It is proposed to carry</p>	

	<p>out alterations to the permitted 'shell' granted under P.A. Ref. 23/6050 as described in Section 2.5 above.</p> <p>The proposed extension occurs within the footprint of the existing hospital campus which has an overall area of 17.13 ha.</p> <p>The site of the hospital is serviced by public infrastructure.</p> <p>The area is noted to not be a flood risk area.</p> <p>The nearest</p>
<b>Brief site description, relevant to WFD Screening,</b>	<p>The appeal site is located in Limerick regional hospital in Dooradoyle which is an urban area. The area is characterised by existing housing development, commercial and retail developments. No soil cover is evident.</p> <p>The topography of the site is level and the surrounding wider is low-lying.</p> <p>The Ballynacloogh River is located approx. 1.5 km to the east of the proposed development which generally flows north and west to drain into Ballinacura creek and Limerick dock.</p>
<b>Proposed surface water details</b>	<p>Constructed as part of P.A. Ref. 23/60506.</p> <p>Managed by SuDS strategy incorporating green infrastructure that includes green roofs, swales, bio-retention systems, permeable paving, for interception, conveyance and storage of surface water run-off. Discharge to drainage gullies</p>

	through petrol interceptors at basement level followed by pumping to the foul outfall manhole at ground level onto St Nessan’s Road.					
Proposed water supply source & available capacity	Uisce Éireann public water mains – no objective raised.					
Proposed wastewater treatment system & available capacity, other issues	Uisce Éireann public foul sewer – no objective raised.					
Others?	No					
Step 2: Identification of relevant water bodies and Step 3: S-P-R connection						
Identified water body	Distance to (m)	Water body name(s) (code)	WFD Status	Risk of not achieving WFD Objective e.g.at risk, review, not at risk	Identified pressures on that water body	Pathway linkage to water feature (e.g. surface run-off, drainage, groundwater)

River Waterbody		1.5 km to east	BALLYNACLOGH_010 IE_SH_24B040800	Moderate	Under Review	None	no
Ground Waterbody			Limerick City Southwest IE_SH_G_141	Good	At risk	Ag	Via surface water run-off
Step 4: Detailed description of any component of the development or activity that may cause a risk of not achieving the WFD Objectives having regard to the S-P-R linkage.							
CONSTRUCTION PHASE							
No.	Component	Water body receptor (EPA Code)	Pathway (existing and new)	Potential for impact/ what is the possible impact	Screening Stage Mitigation Measure*	Residual Risk (yes/no)  Detail	Determination** to proceed to Stage 2. Is there a risk to the water environment? (if 'screened' in or 'uncertain' proceed to Stage 2.
1.	<u>Surface</u> Construction	BALLYNACLOGH_010	Existing surface water drainage system in the area	Siltation, hydrocarbon spillages	Standard Construction practice CEMP	No	Screened out
2.	<u>Ground</u> Construction	Limerick City Southwest	Drainage	Hydrocarbon Spillages	Standard Construction practice CEMP	No	Screened out
OPERATIONAL PHASE							

1	Surface run-off	BALLYNACLOGH_010	Existing surface water drainage system in the area	Hydrocarbon Spillages	SUDS management and features	No	Screened out
42	Discharges to Ground	Limerick City Southwest	drainage	Hydrocarbon Spillages	SUDS management and features	No	Screened out
DECOMMISSIONING PHASE							
1.	NA	NA	NA	NA	NA	NA	NA