



An
Coimisiún
Pleanála

Inspector's Report ACP-323968-25

Development	Construction of 114 dwellings, creche, ESB substation and associated site works
Location	Golf Links Road and Mount Green Road, Newcastle, Castletroy, Limerick
Planning Authority	Limerick City and County Council
Planning Authority Reg. Ref.	2560271
Applicant(s)	Sonnervale Limited
Type of Application	Large-Scale Residential Development
Planning Authority Decision	Grant Permission
Type of Appeal	Third Party
Appellant(s)	Charles and Shirley Helen Enright Castletroy Golf Club Christopher Cole Mary McGuinness William and Kathy O'Halloran Kevin and Caroline Muldoon and Others

Gerard Cosgrave
Alan and Sandra Moylan
Damien Naughton
Mount Green Residents
John Curtin

Observer(s)

Niall Loughrey and Dervla Clohessy
Cllr. Peter Doyle
Helen Enright
Colm Ryan and Deirdre Kinnane
John Twomey
Dennis Griffin and Catherine Lee
Griffin

Further Observer(s)

Mount Green Residents
Mike & Cynthia Durack
Iryna Pavlovska

Date of Site Inspection

4th February 2026

Inspector

Emma Nevin

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1.0 Introduction

- 1.1. This is an assessment of an application for a proposed large-scale residential development (LRD) submitted to Limerick City and County Council under the provisions of the Planning and Development Act 2000, as amended (hereinafter referred to as 'the Act'). This application was granted permission by the Planning Authority and subsequently appealed by the several third parties to An Coimisiún Pleanála.
- 1.2. I also draw the Commissions attention to the fact that three no. leave to appeals were granted and subsequently two no. additional appeals received were received from Charles Pires and Shirley Rocca and Helen Enright (relating to **ACP-324007-26**, granted 30/01/2026 and **ACP-324013-26**, granted 30/01/2026), respectively. I also note that Helen Enright made an observation on the appeal. Three no. further responses were made following the two no. additional appeals noted above. These are all referenced within the report.

2.0 Site Location and Description

- 2.1. The site is a 3.6-hectare greenfield site which is part of an overall housing development site that has been developed on a phased basis, and the subject site represents the last remaining part of the overall site to be developed.
- 2.2. The subject site is located to the rear and east of recently constructed residential units at Caislean Nua, it is bounded to the northeast by the Waterworks, to the east by undeveloped land zoned New Residential, to the south by Castletroy Golf Club and Mount Green Road to the north. Vehicular access to the site is via the Caislean Nua estate which accesses onto the Golf Links Road to the west with potential for access directly from Mount Green Road to the north.
- 2.3. The site is within walking distance (c.1km) of the University of Limerick Campus to the north, Castletroy shopping centre to the east and a number of schools including Gaelscoil Castletroy to the northwest and Limerick Educate Together Secondary School to the southwest. There is an existing footpath and public lighting along the Golf Links Road fronting the Caislean Nua Estate and along the opposite side of the Mount Green Road to the north of the site.

3.0 Proposed Development

3.1. The proposed development comprises of the following:

Construction Works

- 114 no. residential units comprising: 16 no. 2.5 storey 4 bed detached units; 8 no. 2.5 storey 3 bed semi-detached units; 36 no. 2.5 storey 3 bed terrace units; 19 no. 3 storey 2 bed duplex units; 19 no. 3 storey 3 bed duplex units; and 16 no. 2 bed apartments provided within 2 no. 4 storey blocks.
- Ancillary apartment storage facility inclusive of bin and bike store;
- Creche facility.

Ancillary and Supporting Works

- New access road off Mount Green Road;
- Off and on street car parking and bicycle stands;
- Bin storage;
- 6 no. bicycle storage sheds;
- landscaping;
- temporary construction access;
- ESB Substation; and
- All other associated site works.

3.2. Key Development Statistics are outlined below:

Table 1.0: Principal Figures						
Tenure Type	Total No.	Beds	No.	Typology	% of tenure	Unit Size (GFA) m ²
House	60	4 Bed	16	Detached	14%	216.1sqm – 219.1sqm
		3 Bed	44	Terrace & Semi-detached	38%	117.4sqm – 119.4sqm
Apartment	16	2 bed	16	Apartment	14%	98.7sqm
Duplex	38	3 bed	19	Duplex – three bed over two bed	17%	124.8sqm – 137sqm
		2 bed	19	Duplex – two bed under three bed	17%	83.1sqm – 85.3sqm

Table 2.0: Development Areas	
Gross Site Area	3.78 hectares
Net Developable Area (excludes creche facility)	3.25 hectares
Gross Development Floor Area	15,122.5sqm
Building Height	2 – 4 storey
Open Space	15% gross of overall site
Density	35 u/ha
Plot Ratio	0.399
Site Coverage	0.196%
Part V Units	23 no. units (20%)
Creche	438sqm

3.3. In addition to the drawings, the application was accompanied by the following technical reports and appendices:

- Planning Compliance Statement.
- Application Cover Letter.
- Application Form.
- Social Infrastructure Audit.
- Response to LRD Opinion.
- Letters of Consent (LCCC and Landowner).
- OMC Agreement.
- Part V agreement.
- Housing Quality Assessment – 114 units.
- 3D Visualisations.
- Architectural Design Sustainability Statement.
- Building Life Cycle Report.

- Engineering Report.
- SUDS Maintenance Plan.
- DMURS Street Design Audit.
- Landscape Report.
- Landscape Drawing.
- Public Lighting Report.
- Traffic and Transport Assessment.
- Road Safety Audit.
- Quality Audit Report.
- Mobility Management Plan.
- Daylight & Sunlight Assessment.
- CEMP.
- Appropriate Assessment Screening.
- EIA Screening Report.
- Climate Action Energy Statement.

3.4. Following the further information request, the following additional reports were submitted:

- Traffic and Transport Report.
- Golf Course Assessment.
- Construction Entrance Options Overview.

4.0 Planning Authority Pre-Application Opinion

4.1. Pre-application consultation meeting

4.1.1. I refer to pre-application ref: 24/547418 in relation to the proposed LRD at Golf Links Road, Limerick comprising 110 no. residential units; ancillary apartment storage facility; creche facility; and new access road off Mount Green Road.

4.2. Planning Authority Opinion

4.2.1. In the Notice of LRD Opinion, the Planning Authority was of the opinion that the documentation submitted requires further consideration and amendment to constitute a reasonable basis for an application. The applicant was advised that the following is required to be submitted with the application:

- Detailed drawings including plans, sections and elevations of the 2 no. proposed apartment blocks.
- Detailed drawings including plans, sections and elevations of the proposed Duplex Block 4.
- In relation to bicycle and bin storage for the proposed duplex blocks, submitted drawings show the following provisions: ▫ Duplex Block 1 (8 units) - 8 no. bicycle stores and 8 no. bin stores, ▫ Duplex Block 2 (12 units) – 12 no. bicycle stores and 10 no. bin stores, ▫ Duplex Block 3 (10 units) - 9 no. bicycle stores and 5 no. bin stores. ▫ Duplex Block 4 – no detailed drawings submitted. In this regard, secure, locked bicycle and bin storage shall be provided for each unit and the allocation of same shall be clearly shown on drawings.
- Revised drawings to show bin stores facing inward towards the building(s) rather than outwards towards the public road shall be submitted.
- Details of all internal boundaries proposed and site boundaries including with the adjacent Caislean Nua estate, Mount Green Road and undeveloped lands to the east shall be submitted.
- Details of EV housing units shall be shown on submitted drawings.
- Proposals for the maintenance of bin storage areas e.g. details of maintenance company shall be provided.
- Proposals for the management of EV car parking shall be provided.
- Proposals for car share space(s) shall be provided.

4.2.2. Additional details including revised drawings as appropriate should be included for the following:

- Submit a Stage 1 Road Safety Audit to comply with the TII Publication 'Road Safety Audit GE-STY-01024'.
- Submit revised Site Layout Plans to include the recommendations of the Audits, which should be clearly labelled.
- The construction access is proposed via Mount Green Housing Estate Road. The Planning Authority is not in agreement with this proposal. Proposals for an alternative construction access shall be submitted. For example, the construction access could be located between the existing houses 76 and 77 Caislean Nua, where it is proposed to construct a new access to the proposed development. This location is a short distance to the main access onto the Golf Links Road.
- Further traffic calming measures are required along main straights in the interest of safety.
- Road drawings are unclear and overly cluttered; these drawings should be revised in the interests of clarity.
- The main internal road width is shown as being 5.0m in width; this shall be revised to 5.5m to comply with "DMURS".
- Footpath widths shall be revised to 1.8m except at the perpendicular parking areas where the footpath will be impeded by the overhang of parking vehicles
- Show how the overhanging of footpaths at the perpendicular parking areas will be addressed.
- Pedestrian crossing points with the inclusion of tactile paving on the pedestrian desire line are required.
- Driveway dimensions shall be shown on submitted drawings; these shall have a minimum length of 6.0m.
- Car parking dimensions shall be shown on submitted drawings.
- Demonstrate that all footpaths' gradients are in line with Building Regulations.

- Submit a road marking and signage layout plan to include house numbering signage, ornate type, and to include the design, locations and how they are proposed to be mounted.
- Include for a T-Junction raised table ramp/pedestrian crossing at the Golf Links Road Junction/Mount Green Housing Estate Junction. This will require the existing traffic calming ramp on Golf Links Road to be removed.
- Submit a swept path analysis for refuse vehicle and fire tender.
- A spare bank of ducts shall be shown on drawings, to be handed over to Limerick City and County Council upon taking in charge.
- Car parking spaces in the public realm are shown numbered and appears assigned to individual units. This is not acceptable and revised proposals shall be submitted.

4.2.3. A site layout plan shall be submitted to show utility ducting and manholes for broadband services etc. The ducting shall be 100mm diameter uPVC and shall show a connection to each housing unit.

4.2.4. A lighting design in compliance with Limerick City and County Council's Public Lighting Specification shall be submitted.

4.2.5. Additional details in terms of surface water and SuDS, including revised drawings as appropriate.

4.2.6. In terms of access and layout, the applicant is advised that pedestrian and cyclist priority is required at junctions as well as compliance with DMURS.

4.2.7. In terms of bicycle parking for the overall development, the following shall be addressed:

- The proposed bicycle storage for the apartment Blocks consists of 2 tier cycle racks to serve 24 bikes. This type of bike storage isn't suitable for residential development and is normally used in colleges and railway stations as it can be noisy to operate (As per the Cycle Design Manual). A mix of bike storage solutions for the apartments is required, close to access/egress of the apartments. The proposed Lock ups do not appear to be for bike storage.

- The bicycle parking requirement to serve Duplex and Apartment Blocks is 94 spaces. There are also quite a number of terraced houses, which require bike parking to the front of the property. The site layout is not clear, and it is difficult to determine if the required bicycle parking has been provided. For all housing schemes the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities, 2024, requires a general minimum standard of 1 space per bedroom should be applied for all units that do not have ground level open space or similar terraces. Visitor bicycle parking should also be provided. Revised drawings to clearly show bicycle parking in line with the requirements of the Limerick Development Plan and Residential Development and Compact Settlements Authorities, 2024 as appropriate shall be submitted.
- Elevations of bicycle storage for Duplexes and Terraced housing shall be submitted.
- In terms of creche bicycle parking provision, secure and covered bicycle parking for staff separate to drop off spaces for parents shall be provided. The 'cycle stands' for parents drop off shall be covered and of sufficient width to include cargo bike spaces. Elevations of same shall form part of LRD application documentation.

4.2.8. In relation to the EIA Screening Report, the following should be amended:

- The first page it mentions Clare County Council as the consent authority, should be amended.
- The title of the report is Preliminary EIA screening, which implies that it not the final report, this should be clarified.

4.3. **Applicants Response to Opinion**

4.3.1. The application includes an LRD Opinion Compliance Statement. The applicant considers that each of the 8 no. items included in the LRD Opinion have been comprehensively addressed, as detailed in the response statement submitted, including accompanying supporting information prepared by the Design Team and other suitably qualified consultants, which is cross-referenced throughout the compliance statement.

- 4.3.2. A Planning Compliance Statement that demonstrates the extent of consistency with the pertinent Development Plan (the Limerick Development Plan 2022 - 2028) and the relevant Section 28 National Guidelines, as required, has been prepared by HRA Planning.
- 4.3.3. A number of other documents submitted with the LRD Meeting Request were updated, and additional information included in the planning application as prescribed by the LRD Opinion.

5.0 Planning Authority Decision

5.1 Decision

5.2. The Planning Authority granted permission, following further information, on 12th December 2025, subject to 23 conditions, which included the following. I note that **Condition 9** has been referenced in the third part appeals and further responses.

- Condition 2 relates to Development Contributions.
- Condition 3 relates to a cash deposit/bond.
- Condition 4 relates to Part V agreement.
- Condition 5 relates to Section 47 agreement.
- Condition 6 relates to Taking in Charge.
- Condition 7 relates to landscape and boundaries.
- Condition 8 relates to open space requirements.
- Condition 9 relates to construction access i.e. **the Construction Access via Mount Green is not permitted.**
- Condition 10 relates to the naming of the estate.
- Conditions 11, 12, and 13 relate to construction hours, wheel wash facility for construction and the Construction Environmental Management Plan.
- Condition 14 relates to the Waste Management Plan.
- Condition 15 requires a revised Stage 2 Road Safety Audit.

- Condition 16 requires that the residential car parking spaces accommodate ducting for future electrical vehicle charging points.
- Condition 17 relates to a revised public lighting design.
- Condition 18 relates to surface water drainage and SUDS.
- Condition 19 requires that as constructed drawings for the development be submitted upon completion of any phase of the development hereby approved.
- Condition 20 requires certification from all the service providers.
- Conditions 21 and 22 relate to Archaeology requirements.
- Conditions 23 details specific requirements with respect to ecology.

5.3. Planning Authority Reports

5.3.1. The initial Planners' Report (dated 25th May 2025) can be summarised as follows:

Principle of Development

- This site is zoned New Residential under the Limerick Development Plan 2022-2028. 'Residential' and 'Childcare Facilities' are generally permitted in this zone. The principle of the development is therefore considered to be in line with the zoning objective and zoning matrix of the Limerick Development Plan.
- The National Planning Framework seeks to accommodate a substantial amount of future population growth in our cities or their suburbs and recognises the need to deliver quality homes within the built-up footprint of existing settlements at locations that can support sustainable development and at an appropriate scale of provision relative to location.
- The development of the subject site for appropriate residential development is welcomed.

Site layout

- The site is a 3.6 hectare greenfield site, which is part of an overall housing development site that has been developed on a phased basis, and the subject site represents the last remaining part of the overall site to be developed.

Density

- The proposal has been designed to provide high quality homes in a mix of two, three and four bed units at a density of 35.3 units per hectare. As per the Limerick Development Plan, 2022-2028, the subject site lies within Density Zone 3 Suburban Edge where a minimum net density of 35+ dwelling units per hectare is required.
- As per Table 3.2 of the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (January 2024) the site is located within the City - Suburban/Urban Extension Suburban area.
- The site is located south of the future Bus Connects network, c.850m from the proposed 10-min frequency route along the L1118 Plassey Park Road and c.500m from the proposed 15-min frequency route along the R445 Dublin Road. The site is therefore located in an Intermediate Location. In this regard, as per the Guidelines a residential density in the range 35 dph to 50 dph (net) is appropriate on the subject site.
- Having regard to the proposed density, the current proposal is considered to be in line with the density requirements of both the Limerick Development Plan and the Sustainable Residential Development and Compact Settlements Guidelines.

Space Requirements and Associated Facilities

- All dwellings are 2.5-storey in height and from submitted drawings, typical bedroom sizes are between 9sqm and 25.8sqm with the majority being 9sqm and c.12/13sqm. Floor to ceiling areas of units vary from 2.45m to 3m.
- All apartment and duplex blocks are 3-storey in height. An external storage building consisting of communal bin storage, bike storage to cater for 24 bicycles, and 12 no. lock up stores. It is unclear if any other facilities are proposed as no detailed drawings of the proposed apartment blocks have been submitted.
- From submitted drawings, typical bedroom sizes are between 9.5sqm and 14.1sqm with the majority being c.12sqm and 13sqm. All apartment and

duplex units are dual aspect. Floor to ceiling areas of duplex units vary from 2.7m to 3.15m.

Childcare Facility

- The proposed creche facility, would be located at the site entrance off the Mount Green Road. It is a two-storey standalone building with a total floor area of 438sq.m with the capacity to support 48 no. children.
- It is outlined in the application documentation that the creche is intended to serve not only the residents of the proposed development but also to accommodate families from other residential developments in the area, thereby enhancing the overall provision of childcare services within the locality.
- In line with the phasing schedule submitted the creche is to be delivered as part of Phase 1.
- The drawings submitted indicate that 5 classrooms are proposed catering for 48 children in total. As per the Childcare Facilities Guidelines, a minimum of 2.32m² of floor area is required per child aged 2-6, 2.8m² for children aged 1-2 and 3.5m² for children aged 0-1.
- The floor area for all rooms appear to comply of the required amount of floor space.

Design, Height, Scale, Materials and Finishes

- As set out in the applicants Building Lifecycle Report, the development has taken account of sustainable design principles focusing on optimising these systems to reduce energy consumption, minimize carbon emissions and enhance the overall environmental performance of buildings.
- The development is proposing that all dwelling units will have an A2 rating. This is considered acceptable and in line with Objective CAF O7 New Zero Energy Buildings of the Limerick Development Plan. All residential units have been designed to comply with Part M of The Building Regulations. The development satisfies the minimum requirements regarding the provision of private and communal space and includes for adequate cycle parking within the building envelope. The overall design and layout provide for a welcome

development of this site, that is appropriately zoned, and it is considered that it will make a positive contribution in urban design terms to the surrounding area. The proposed development complies with the relevant Section 28 Guidelines and with the policies and objectives of the Limerick Development Plan and any issues raised by way of third party objector have been addressed.

Residential Amenity of Adjacent Properties

- The proposal seeks to mitigate any overlooking of existing dwellings to the west by way of design and orientation of the proposed units. For example, the apartments are located at the end of a cul-de-sac internal road at the southeast corner of the site at a significant distance from existing dwellings.
- The submitted documentation confirms that as per the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (January 2024), a separation distance of 16m has been maintained between opposing first floor windows.

Open Space Provision

- The apartments and duplex units are provided with private balconies or terraces that meet standards.
- The applicant should be requested to address concerns that the proposed linear park by reason of its elevated level to the rear of existing houses could lead to undue overlooking. There is also a concern that the proposed walkway through the linear park may not comply with Technical Guidance Document Part M in relation to Access and Use.

Car Parking/Bicycle Parking

- The provision of reduced car parking associated with the proposed development is considered generally acceptable. Two no. car share spaces are provided. It is noted that in accordance with the requirements of the Development Plan, 13 no. EV charge points are proposed to be provided.
- The proposed two tiers bike store serving the apartments is not suitable due to concerns that such facilities can be noisy to operate that. In the event of a grant of permissions a condition requiring an alternative layout should be

attached and the management plan for the apartments should include the operation and maintenance of the cycle storage facilities.

Access

- The site is essentially proposed to be split into three with access from the northern part to be provided via Mount Green Road, access from the southern part of the site being provided via the existing Caislean Nua housing estate.
- Internal roads and footpaths will be designed and constructed in accordance with DMURS. As part of the Stage 2 LRD Opinion the applicant was advised that there were significant concerns with the proposed construction access onto the Mount Green Road. The planning application has included a construction access on this road. Further information should be requested seeking its omission.
- The Roads Section have outlined a number of requests in term of roads layout, servicing of the site, public lighting, surface water and SuDs Management. Further information should be sought in relation to these issues.

Mobility Management Plan

- An outline Mobility Management Plan (MMP) has been submitted in line with Objective TR023 of the Limerick Development Plan 202-2028 as part of the traffic assessment. The Active Travel Section has recommended that in the event of a grant of permission a revised MMP should be sought which provides for modal split targets in line with the NTA standards along with measures to encourage sustainable travel. However, given that the development is for a residential development and small scale creche this is not considered necessary in this case.

Flood Risk

- The site located on Flood Zone C lands; therefore, a flood risk assessment is not required.

Information for Appropriate Assessment Screening / Environmental Impact Assessment

- An AA and EIA Screening have been submitted as part of the application. Both have been reviewed by the Council Ecologist (23/05/25) and are considered acceptable.

Archaeology

- It is recommended that archaeological monitoring of all site investigations, excavation works and all ground disturbance associated with the development should be required in the event of a grant of permission.

Landscape and Biodiversity

- A Landscape Plan accompanies the development proposal. Details are included, all internal boundaries proposed and site boundaries including with the adjacent Caislean Nua estate, Mount Green Road and eastern lands. It is intended that the planting scheme will be at least 75 % pollinator friendly keeping in line with the 'All Ireland Pollinator Plan 2021 - 2025'.

Part V

- A preliminary Part V Agreement letter was issued by the Housing Section. An agreement in principle to comply with Part V has been reached.

Third Party Observations

- The third-party submissions on file are noted and have been taken into account in the assessment of the application.

5.3.2. Notwithstanding, the planner requested Further Information (FI) in relation to 7 no. items including:

- The proposed construction access through Mount Green Road omitted and to provide an alternative construction access through their Caislean Nua, which is easily accessed between the existing houses 76 & 77.
- A revised lighting design is requested, fully in line with Limerick City and County Council's Public Lighting Specification (2022).
- Surface Water & SuDs Management drawings and supporting information for specific items showing compliance with Limerick City and County Council's Surface Water & SuDs Specification (2022).

- An Ecological Impact Assessment to include the following: a) A bat activity and roost suitability survey b) An FPO plant species survey c) A badger survey.
- Clarify what measures are to be incorporated into the design of the proposed development to protect the safety and amenity of residents of the development from the potential impacts of the operation and enjoyment of the golf course.
- Submit a drawing identifying all areas of the proposed development to be taken in charge by the Local Authority.
- Noting Section 11.3.6 Open Space Requirements of the LCCC Development plans, which states ‘Houses shall not be permitted to back onto open spaces’, to submit a proposal to address the proposed linear park to the rear of house numbers 63-70, where the proposed open space would be at a substantially higher level than the levels of the existing dwellings, resulting in overlooking of the existing dwellings.
- Demonstrate how the proposed linear park will comply with Technical Guidance Document Part M in relation to Access and Use.

5.3.3. The Planner’s Report following the submission of the FI Response assessed the applicant’s FI response as follows:

- Item 1: The Roads Section has significant concerns regarding the Applicant’s proposal to utilise the Mount Green Housing Estate Road, which is under the Council’s charge, as the primary construction access route for the proposed development. The use of this route for construction traffic would therefore have a substantial and prolonged impact on many residents located at Mount Green Housing Estate. The comments from Uisce Éireann are also noted and again highlight concerns with the use of this stretch of road for construction access purposed. Uisce Éireann have stated that they require unimpeded HGV access to this Reservoir.
- Given that the applicant has an available construction access through their own lands and the concerns raised, it is recommended that a condition is

attached to ensure that a revised construction entrance is submitted prior to the commencement of development.

- Item 2: A revised lighting design has been prepared and submitted by Litho Circuits. The Roads Department have reviewed the information submitted and have stated that it does not appear to align with Limerick City and County Council's Public Lighting Specification.
- A condition will be attached subject to a grant of permission requesting that the Applicant shall submit a revised public lighting design for the written agreement of the Planning Authority, fully in accordance with Limerick City and County Council's Public Lighting Specification.
- Item 3: The Roads Department have reviewed the information submitted and has stated that drawings and supporting information showing compliance with Limerick City and County Council's Surface Water & SuDs Specification shall be submitted for the written agreement with the Planning Authority prior to the commencement of the development.
- Item 4: The Council's Ecologist has reviewed the information submitted and is satisfied to recommended conditions subject to a grant of permission.
- Item 5: The report notes that it is the responsibility of Castletroy Golf Club to ensure that golf balls played from the 1st Tee and from other parts of the course were and are restricted from travelling into the adjoining lands. The development seeks to retain the existing treeline and hedgerow along with the existing wall on the southern site boundary adjoining the golf course. Save for the gable end of a terrace of houses at the south western corner of the site, all houses are located a minimum of 21m from the southern site boundary. A condition will be attached subject to a grant of permission that the existing mature hedgerow and wall along the southern boundary shall be retained.
- Item 6: A revised Taken in Charge Map shall be requested to be submitted for the written agreement of the planning authority prior to the commencement of development subject to a grant of permission.
- Item 7: There are concerns regarding the proposed Linear Park which is located to the rear of house numbers 63-70 where the proposed open space

would be at a substantially higher level than the levels of the existing dwellings. The Applicant has stated that the land slopes from east to west with a drop in level between the existing development along the western boundary. The applicant has stated that to avoid any potential overlooking the existing gardens will be screened from the public path by the retention of the existing boundary wall with additional 1.8m high fence on top. Given the constraints on site, it is considered that the proposal is considered acceptable.

- Concerns have previously been raised regarding the removal of the boundary wall on the northern part of the site adjacent to Mount Green Road. Residents have requested that it be constructed up the northern length of the site. However, this would create an area of dead space behind a wall. The green strip as proposed adjacent to Mount Green Road would allow for additional landscaping to be planted. It is noted that there is a triangular area of land that could be left over between any future boundary which is not recommended given that this could result in an area of dead space. It is therefore recommended that further details of landscaping and boundaries are agreed prior to the commencement of development.

5.3.4. It was considered that the proposed development of 114 no. residential units is fully compliant with the applicable zoning objectives. Its scale, height, and design are consistent with the established character of the surrounding area and reflect a considered approach to urban form. Furthermore, the proposal adheres to the standards set out in the Limerick Development Plan and relevant government guidelines, contributing positively to the sustainable growth and development of the area. As such the Planning Authority recommended a grant of planning permission for this LRD subject to the conditions as noted in Section 5.1.1 above.

5.3.5. Other Technical Reports

- Roads Section – Following detailed further information the Roads Section had significant concerns regarding the Applicant’s proposal to utilise the Mount Green Housing Estate Road, which is under the Council’s charge, as the primary construction access route for the proposed development. Given that there is an alternative access route the Roads Department have requested that the applicant redesign the access routes to comply fully with DMURS and the

National Cycle Manual. Recommends conditions to be attached to any grant of permission.

- Lighting Arrangements – Revised lighting design required in line with Limerick City and County Council’s Public Lighting Specification for the approval with the Planning Authority.
- Surface Water & SuDs Management Plan – Drawings and supporting information required showing compliance with Limerick City and County Council’s Surface Water & SuDs Specification shall be submitted.
- Mid-West Roads – No observations.
- Fire Officer – Conditions to be attached.
- Housing Section – A preliminary Part V agreement letter was issued to applicant and is included in the planning application - the transfer of 23 no. units on-site.
- Ecologist – Following receipt of further information - The findings of the survey submitted are considered acceptable. Conditions recommended.
- Broad Development Manager Digital Services – Developer shall ensure appropriate telecommunications infrastructure is provided as part of the development.
- Parks – No additional drawings have been received demonstrating successful screening towards existing housing. There is non-compliance with previous phases of the development, and they have concerns regarding the usability of the linear park due to position to sides and rear of properties as well as steep slopes on soft landscape areas.
- Active Travel – Revisions in relation to bike storage and bicycle parking requested. Relocate bus stop.
- Roads Traffic & Cleansing - Proposed raised tabletop junction at access to Mount Green acceptable. Pedestrian crossing may be provided by Limerick City and County Council on Golf Links Road as part of Bus Connects development works.
- Taking in Charge – On review of the Taking in Charge map submitted the TIC team are not satisfied with one element on the Southeast Side of the

development the parking spaces in front of Block A & Block B are not included for taking in charge by LCCC. A revised TIC map will be requested by way of condition.

5.3.6. Conditions

- Notwithstanding, the decision of the planning authority to refuse permission as noted in Section 5.1.1 above, where bespoke conditions, have been recommended or attached by the internal departments these relevant conditions will be considered in my assessment of the proposed development, and consideration will be given as to whether the condition should be included in any decision to grant by the Commission.

5.4. Prescribed/Other Bodies

5.4.1. Department of Housing, Local Government and Heritage (DAU) (6th May 2025) –

- The proposed area of the site is within an area that would be sensitive to water quality issues, as it is in close proximity of the Lower River Shannon SAC. Any proposed works within this area could have a negative impact on water quality in the area. Ensure watercourse mitigation measures are undertaken to prevent runoff during works to the adjacent SAC.
- Any proposed machinery operations within this area could have a negative impact on nesting birds in the area, works should be carried out outside of bird nesting season 1st September.
- Should ground works include the alteration or removal of hedgerows or trees on site, this is to be undertaken outside of the bird nesting season 1st March to 31st of August.

5.4.2. Uisce Éireann (27th November 2025 and 7th May 2025) –

- A Confirmation of Feasibility confirms that water and wastewater connections are possible, but upgrades are required, including a new connection and an on-site booster pump. Fire flow cannot be guaranteed, so on-site fire storage must be provided.
- Hydraulic modelling is needed to assess flooding risk and may require upgrades or diversion of the foul sewer. Uisce Éireann also requires

uninterrupted access to its reservoir on the Mount Green Road at all times, which must be agreed in advance.

- Building over existing infrastructure is not allowed unless prior approval for diversion is obtained from Uisce Éireann.

Following receipt of further information the following comments were received:

- Uisce Éireann (UÉ) owns and operates a major reservoir (the Newcastle Reservoir) on the 'Water Tower'/Mount Green Road and therefore, requires unimpeded HGV access to this Reservoir.
- It is imperative that UÉ's access to the reservoir will not be restricted during the Construction works for this proposed development, and subsequently, when the housing development is occupied.
- Recommends conditions to be attached to any grant of permission.

5.4.3. Transport Infrastructure Ireland (30-Apr-2025) –

- Transport Infrastructure Ireland requests that the planning authority has regard to the provisions of official policy for development proposals as follows: proposals impacting national roads, to the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities and relevant TII Publications and proposals impacting the existing light rail network, to TII's "Code of engineering practice for works on, near, or adjacent the Luas light rail system".

5.5. Third Party Observations

5.5.1. Forty (40 no.) third party observations were received by the planning authority and the issues raised have been set out in the Planning Report.

5.5.2. In summary, the key issues raised are similar to those included in the appeal and relate to significant concerns regarding access, safety, and overall suitability. It is considered that Mount Green is a separate estate and should not be used as an access route; all entry should instead be via the main Caislean Nua entrance. The existing road network in Mount Green is narrow, has poor visibility, and is unsuitable for increased traffic or construction vehicles, posing serious risks to residents, particularly children.

- 5.5.3. It was noted that traffic in the surrounding area is already congested, and the development would worsen delays without adequate supporting infrastructure such as proper footpaths, cycle lanes, or public transport. Parking provision within the scheme is insufficient, likely leading to congestion and unsafe parking practices.
- 5.5.4. The objectors considered that the scale and density of the development are excessive and out of character with the area, resulting in overlooking, loss of privacy, and reduced residential amenity—especially in the case of Block 4. Construction impacts, environmental concerns, drainage issues, and the loss of green space and mature trees further add to the negative impact.
- 5.5.5. Overall, the proposal represents overdevelopment with inadequate infrastructure and planning, and a fundamental redesign is required to address access, safety, scale, and community needs.
- 5.5.6. The planners report (Section 7.16) addresses and responds to the issues/concerns raised in the third party observations.

6.0 Planning History

6.1. Subject site:

- 6.1.1. An Bord Pleanála Ref:13.213499/P04/670 – Permission was granted on appeal to An Bord Pleanála on 27th January 2006 for alteration and amendments to part of previously permitted development (98/1967) to provide for proposed new site layout, roads, drainage, public and private open space, footpaths, cycle ways, 88 no. four bedroom semi-detached houses, 3 no. five bedroom detached houses, 9 no. four bedroom detached houses, 56 no. three bedroom duplex units & 72 no. two bedroom apartments & all associated landscaping & site works in lieu of 102 no. four & five bedroom detached houses, associated site layout and site works previously permitted.
- 6.1.2. An Bord Pleanála Ref:PL13.118381/P98/1967 – Permission was granted on appeal to An Bord Pleanála on 23rd June 2000 for 148 houses at Golf Links Road, Newcastle, Castletroy.

7.0 Policy Context

7.1. National Planning Policy

National Planning Framework (2025)

7.1.1. The National Planning Framework (NPF) 2025 sets out that the ‘major policy emphasis on renewing and developing existing settlements established under the NPF 2018 will be continued, rather than allowing the continual expansion and sprawl of cities and towns out into the countryside, at the expense of town centres and smaller villages’.

7.1.2. Relevant Policy Objectives include:

- National Policy Objective 7: Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements and ensure compact and sequential patterns of growth.
- National Policy Objective 8: Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints and ensure compact and sequential patterns of growth.
- National Policy Objective 9: Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints and ensure compact and sequential patterns of growth.
- 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 11 – Planned growth at a settlement level shall be determined at development plan-making stage and addressed within the objectives of the plan. The consideration of individual development proposals on zoned and serviced development land subject of consenting processes under the Planning and Development Act shall have regard to a broader set of considerations beyond the targets including, in particular, the receiving capacity of the environment.

- National Policy Objective 20: In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.
- National Policy Objective 22 – In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high-quality outcomes in order to achieve targeted growth.
- National Policy Objective 43 – Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.
- Implements carbon budgets and sectoral emissions ceilings and sets a roadmap for taking decisive action to halve our emissions by 2030 and reach net zero no later than 2050. By 2030, the plan calls for a 40% reduction in emissions from residential buildings and a 50% reduction in transport emissions. The reduction in transport emissions includes a 20% reduction in total vehicle kilometres, a reduction in fuel usage, significant increases in sustainable transport trips, and improved modal share.

Delivering Homes, Building Communities, 2025

- 7.1.3. This document aims to further accelerate the delivery of new homes, to deliver 300,000 by the end of 2030, which will be achieved through the individual and collective effort of the key delivery partners. Local authorities, together with Approved Housing Bodies, the Land Development Agency, and the construction sector, will be critical to delivering and enabling the delivery of the quantum of homes needed over the lifetime of the plan. This is a wide-ranging strategy, encompassing two pillars: Activating Supply and Supporting People.

Climate Action Plan, 2024 and 2025

- 7.1.4. Implements carbon budgets and sectoral emissions ceilings and sets a roadmap for taking decisive action to halve our emissions by 2030 and reach net zero no later than 2050. By 2030, the plan calls for a 40% reduction in emissions from residential

buildings and a 50% reduction in transport emissions. The reduction in transport emissions includes a 20% reduction in total vehicle kilometres, a reduction in fuel usage, significant increases in sustainable transport trips, and improved modal share.

- 7.1.5. 2025 update -Implements carbon budgets and sectoral emissions ceilings and sets a roadmap for taking decisive action to halve our emissions by 2030 and reach net zero no later than 2050. The residential sector is on track to meet its 2021-2025 sectoral emissions ceiling and is ahead of its 2025 indicative reduction target of - 20%.

National Biodiversity Action Plan (NBPA) 2023-2030

- 7.1.6. The 4th NBAP strives for a “whole of government, whole of society” approach to the governance and conservation of biodiversity. The aim is to ensure that every citizen, community, business, local authority, semi-state and state agency has an awareness of biodiversity and its importance, and of the implications of its loss, while also understanding how they can act to address the biodiversity emergency as part of a renewed national effort to “act for nature”.
- 7.1.7. This National Biodiversity Action Plan 2023-2030 builds upon the achievements of the previous Plan. It will continue to implement actions within the framework of five strategic objectives, while addressing new and emerging issues:

- Objective 1 - Adopt a Whole of Government, Whole of Society Approach to Biodiversity
- Objective 2 - Meet Urgent Conservation and Restoration Needs
- Objective 3 - Secure Nature’s Contribution to People
- Objective 4 - Enhance the Evidence Base for Action on Biodiversity
- Objective 5 - Strengthen Ireland’s Contribution to International Biodiversity Initiatives

Water Framework Directive

- 7.1.8. The Water Framework Directive (WFD) Directive 2000/60/EC focuses on ensuring good qualitative and quantitative health, i.e., on reducing and removing pollution and

on ensuring that there is enough water to support wildlife at the same time as human needs.

- 7.1.9. The key objectives of the WFD are set out in Article 4 of the Directive. It requires Member States to use their River Basin Management Plans (RBMPs) and Programmes of Measures (PoMs) to protect and, where necessary, restore water bodies in order to reach good status, and to prevent deterioration. Good status means both good chemical and good ecological status. It establishes a framework for the protection of all inland surface waters, transitional waters, coastal waters and groundwaters.

Section 28 Ministerial Guidelines

- 7.1.10. In consideration of the nature and scale of the proposed development, the receiving environment and the site context, as well as the documentation on file, including the submissions from the Planning Authority and other parties addressed below, I am satisfied that the directly relevant Section 28 Ministerial Guidelines comprise of:

Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) (hereinafter the ‘Sustainable Settlements Guidelines’);

- The guidelines note “*City - Suburban/Urban Extension Suburban areas are the low density car orientated residential areas constructed at the edge of cities in the latter half of the 20th and early 21st century, while urban extension refers to greenfield lands at the edge of the existing built-up footprint that are zoned for residential or mixed use (including residential) development. It is a policy and objective of these Guidelines that residential densities in the range 35 dph to 50 dph (net) shall generally be applied at suburban and urban extension locations in Limerick, Galway and Waterford, and that densities of up to 100 dph (net) shall be open for consideration at ‘accessible’ suburban / urban extension locations (as defined in Table 3.8).*
- *Intermediate Location (Table 3.8: Accessibility) • Lands within 500-1,000 metres (i.e. 10-12 minute walk) of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services; and • Lands within 500*

metres (i.e. 6 minute walk) of a reasonably frequent (minimum 15 minute peak hour frequency) urban bus service”.

Design Standards for Apartments, Guidelines for Planning Authorities, (2025)

- The guidelines, hereafter referred to as the Apartment Guidelines, provide quantitative and qualitative standards for apartment development across a range of thresholds depending on the number of units proposed and the site's context. It also sets out SPPRs to be adhered to across a range of parameters. Applicable standards for the proposed development include requirements in respect of minimum floor areas, and by reference to Appendix 1, minimum storage and private open space areas, % of dual aspect units, and minimum 2.7m requirement for ground level floor to ceiling height.

Urban Development and Building Heights, Guidelines for Planning Authorities (2018) (hereinafter the ‘Building Heights Guidelines’);

- SPPR 3: An application needs to set out how the development complies with development management criteria in relation to at the scale of the relevant city/ town, at the scale of district/ neighbourhood/ street and at the scale of the site/ building.

Design Manual for Urban Roads and Streets (DMURS) (2019);

Water Services Guidelines for Planning Authorities – Draft (2018) and Circular FPS 01/2018 issued by the Department of Housing, Planning and Local Government on the 17th day of January 2018;

Childcare Facilities – Guidelines for Planning Authorities (2001) (hereinafter the ‘Childcare Guidelines’).

7.1.11. Although not an exhaustive list, the following planning guidance and strategy documents are also considered relevant:

- Cycle Design Manual (2023).
- Part V of the Planning and Development Act 2000 - Guidelines (2017).
- Road Safety Audits (TII, 2017).
- Traffic and Transport Assessment Guidelines (TII, 2014).

- Building Research Establishment (BRE) 209 Guide - Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice, (2nd Edition 2011, 3rd Edition 2022).
- AA of Plans and Projects in Ireland - Guidance for Planning Authorities (2009).
- The Planning System and Flood Risk Management - Guidelines for Planning Authorities.
- National Biodiversity Action Plan 2023–2030.

7.2. Regional Planning Policy

The Regional Spatial and Economic Strategy for the Southern Region (RSES)

- 7.2.1. The Southern Regional Assembly Regional Spatial & Economic Strategy provides for the development of nine counties including Limerick and supports the implementation of the National Development Plan (NDP).
- 7.2.2. The Regional Spatial and Economic Strategy for the Southern Regional Assembly (RSES) identifies employment and population targets for the region which are consistent with the NPF, along with policy objectives to deliver such growth in a sustainable manner in both urban and rural locations.
- 7.2.3. Of relevance are:
- RPO 10 (compact growth in the metropolitan areas),
 - RPO 34 (regeneration, brownfield and infill development)
 - RPO 35 (compact growth)
- 7.2.4. Limerick-Shannon is identified as one of three Metropolitan Areas in the Strategy which includes the Limerick-Shannon Metropolitan Area Strategic Plan (MASP). The following MASP Policy Objectives are of note:
- Policy Objective 1 and Policy Objective 2 - to achieve compact growth and regeneration and consolidation of development in Limerick city centre and suburbs.

- Policy Objective 5 to identify suitable sites for regeneration and development by a quality site selection process that addresses environmental concerns.
- Policy Objective 10 which seeks to support the environmentally sustainable densification of Limerick City Centre, the assembly of brownfield sites for development and the regeneration of suburbs to accommodate residential use.
- Policy Objective 21 seeks to deliver projects which can strengthen place making and public realm improvements.

7.3. Limerick City and County Development Plan, 2022-2028

- 7.3.1. The Limerick Development Plan 2022 - 2028 is the current statutory plan for Limerick City and includes the subject site. The Core Strategy is provided in Chapter 2, and this sets out population projections over the lifetime of the plan.
- 7.3.2. Table 2.2 provides the 'Population growth Q3 2016-Q2 2028, with estimate of growth up to Q2 2022 and future growth to be facilitated by end of 2022-2028 Development Plan period'. A population growth of 30,621 is estimated in the period 2022 – 2028 for Limerick City and suburbs.
- 7.3.3. Under Section 2.3.3 – 'Settlement Hierarchy' it states that '1. Limerick City and Suburbs (in Limerick), Mungret and Annacotty is designated for significant growth under the NPF and RSES;'.
- 7.3.4. Table 2.6 provides 'Density Assumptions per Settlement Hierarchy' and Map 2.2 details the 'Limerick City and Suburbs (in Limerick), Mungret and Annacotty Density Zones'.
- 7.3.5. The subject site is located in an area with a density of 35+ Housing Units per Hectare. As per Table 2.6 the following refers to Density Zone 3, which the subject site is located within: '*Density Zone 3: Suburban Edge: A minimum net density of 35+ dwelling units per hectare are required at sites in suburban development areas that do not meet proximity or accessibility criteria of the Intermediate Urban Locations*'.
- 7.3.6. The subject site is zoned 'New Residential' on 'Map 3: Limerick City and Suburbs (in Limerick), including Mungret and Annacotty - Zoning Map'. This zoning has an

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

7.3.7. Map 5: 'Limerick City and Suburbs (in Limerick), including Mungret and Annacotty - Flood Map' locates the site within Flood Zone C.

7.3.8. Map 6: 'Limerick City and Suburbs (in Limerick), including Mungret and Annacotty - Transport Map' includes 'Indicative Cycleways/ Walkways' along the Golf Links Road to the west of the site.

7.3.9. Relevant Development Plan Chapters/Volumes:

- Chapter 6 refers to 'Environment, Heritage, Landscape and Green Infrastructure'.
- Chapter 7 refers to 'Sustainable Mobility and Transport' and Chapter 8 'Infrastructure'.
- 'Sustainable Communities and Social Infrastructure is in Chapter 10.
- 'Development Management Standards' are in Chapter 11.
- Volume 2 - Settlements and Zoning Maps.
- Volume 4 - Environmental Reports include a Strategic Environmental Assessment (SEA), a Natura Impact Report and a Strategic Flood Risk Assessment (SFRA).
- Volume 6 includes a 'Building Height Strategy for Limerick City'.

7.3.10. Specific Policy Objectives, which have been referenced in planners report and third party appeals, including:

- Objective HO O3 Protection of Existing Residential Amenity "It is an objective of the Council to ensure a balance between the protection of existing residential amenities, the established character of the area and the need to provide for sustainable new development".
- Objective SCS1 O20 Protection of Sports Grounds/Facilities "It is an objective of the Council to a) Ensure that adequate playing fields for formal active recreation are provided for in new development areas. b) Protect, retain and enhance existing sports facilities and grounds".

- Objective CAF O7 Near Zero Energy Buildings “It is an objective of the Council to support and promote climate smart and the Near Zero Energy Building (NZEB) standard of building, or equivalent, for all new developments”.
- Objective TR023 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”.

7.4. Natural Heritage Designations

7.4.1. The following European Sites should be noted:

Name	Site Code	Distance from Site
Lower River Shannon SAC	[002165]	1.7km
River Shannon and River Fergus Estuaries SPA	[0040677]	5.5 km

8.0 The Appeal

8.1. Grounds of Appeal

- 8.1.1. **Ten (10 no.) third appeals** have been lodged in respect of the proposed development. I note that a USB including video footage of the adjoining site boundary with the golf course is included as part of the appeal.
- 8.1.2. Three no. leave to appeal applications were granted under ACP-324007-26, ACP-324024-26 and ACP-324013-26. All of the leave to appeal applications related to the

inclusion of Condition No. 9 of the local authority grant of permission. On foot of the leave to appeals **two further third party appeals** were received from Charles Pires and Shirley Rocca and Helen Enright (relating to ACP-324007-26 and ACP-324013-26, respectively).

8.1.3. The main issues raised have been summarised as follows:

Access Through Mount Green

- Strong, consistent opposition to vehicular, pedestrian, and cycle access linking Caisleán Nua to Mount Green.
- Mount Green is:
 - A small (24–25 houses), quiet cul-de-sac.
 - A separate, established estate with no historic connection to Caisleán Nua.
- Proposed link would:
 - Increase traffic ~4x (vehicles) and up to 8x (pedestrians).
 - Turn estate into a “through-road” / distributor road.
- Unnecessary (alternative access exists via Caisleán Nua).
- Self-serving (developer avoiding routing traffic through own estate).
- Contrary to previous planning precedents (similar links previously rejected).
- The estates must remain separate, with no access link.

Traffic, Road Safety & Infrastructure Capacity

- Mount Green roads:
 - Narrow, not designed for high traffic.
 - Poor visibility, blind spots, limited footpaths.
 - Entrance only ~22ft wide vs ~39ft in Caisleán Nua.
- Risks identified:
 - Increased collision risk (cars, cyclists, pedestrians).
 - Danger to children playing in cul-de-sac.
 - Unsafe for service vehicles (bin trucks, emergency access).

- Construction access deemed unsafe, yet permanent access allowed.
- Traffic study:
 - Considered wider junctions only.
 - Did not assess estate-level impacts.
- Road network is unsuitable and unsafe for proposed traffic volumes.

Residential Amenity & Quality of Life

- Loss of:
 - Privacy.
 - Quiet environment.
 - Sense of security.
 - Community identity.
- Increase in:
 - Noise.
 - Disturbance.
 - Traffic outside homes (especially Nos. 20–26).
- Children currently use roads for play; this would become unsafe.

Design issues (duplex block)

- Overlooking from Windows and balconies.
- Overbearing scale - 3-storey vs surrounding 2-storey homes.
- Overshadowing, including loss of daylight and impact on solar panels.
- Development would cause serious and unacceptable deterioration in living conditions.

Parking & Overspill Issues

- Inadequate parking provision in new development i.e. 1.24 spaces per unit.
- Likely consequences:
 - Overspill parking into Mount Green.

- Loss of existing on-street parking (yellow lines).
- Blocked roads and footpaths.
- Creche adds further pressure (drop-off/pick-up traffic).
- Parking strategy is insufficient and shifts burden onto Mount Green residents.

Planning Process Failures & Policy Issues

- Planners Report:
 - Did not assess traffic link impact.
 - Ignored resident objections.
 - Failed to consider cumulative impacts.
- Planning Application does not include the following assessments:
 - Daylight / overshadowing.
 - Traffic capacity.
 - Noise.
 - Golf safety.
- Potential invalid application (LRD regulations timing).
- Policy conflicts:
 - Development Plan objectives.
 - DMURS (street design).
 - Sustainable settlement guidelines.
 - Lack of integration / creation of segregated scheme.
- Decision is argued to be incomplete, flawed, and potentially unlawful.

Environmental & Biodiversity Concerns

- Removal of mature trees (privately maintained) in Mount Green.
- Loss of biodiversity (birds, bats, hedgehogs).
- Loss of visual amenity and heritage.
- No Environmental Impact Assessment.

- Bat surveys considered inadequate.
- Tree Preservation Order for trees in Mount Green.
- Proper ecological studies should be submitted.
- Environmental impacts are under-assessed and potentially significant.

Boundary, Identity & Community Integrity

- Strong emphasis on maintaining physical boundary (wall).
- The estate identity of Mount Green should be preserved.
- Concern regarding proposed removal of wall/fencing.
- Open-plan connection between estates not acceptable.
- The applicant should reinstate/extend permanent boundary wall.
- Avoid “merging” estates and protecting clear separation is central to residents’ concerns.

Golf Club Impacts:

- Development placed in golf ball strike zone.
- Risks including injury to residents and liability for golf club.
- The application is missing a Ball-strike analysis and Noise assessment (early morning maintenance).
- Planning principle - Failure to apply “agent of change”.
- Requested mitigation – including netting, walls, course redesign (developer-funded).

Alternative Solution Proposed

- Use internal Caisleán Nua road network instead of Mount Green.
- This has several benefits including, no loss of housing units, safer traffic management, minimal design impact and resolves majority of objections.
- Better alternative solution is available.
- A viable, lower-impact alternative exists.

Condition 9 of grant of permission:

- The permission as granted allows for construction traffic through the Caislean Nua estate, which is a material alteration and fundamentally changes the impact of the development.
- The development in terms of the construction access is unsound and should be amended to require all construction traffic to use Mount Green Road.
- The proposed method of construction access now authorised, gives rise to serious safety and amenity issues and was not clearly identified during the public application process.
- This outcome significantly alters the nature of the development from the perspective of existing residents and results in impacts that were not apparent at application stage.

Impact on residential amenity:

- Allowing construction traffic through Caislean Nua, an occupied residential estate will lead to noise and vibration disturbance, dust and air quality issues, obstruction and loss of residential amenity and these impacts were not properly assessed.

Health and Safety

- Public health and safety concerns to children and other vulnerable road users with the introduction of construction traffic through the estate.
- A safer alternative access route via Mount Green Road existing and was initially identified.

8.2. Observations

8.2.1. Six (6 no.) detailed observations were received. I note that an observation was received from Helen Enright, who subsequently lodged a third party appeal (also noted in the forgoing section), following a grant of a leave to appeal in respect to the development as noted in Section 8.1 above.

8.2.2. The key planning issues raised in the observations have been summarised as follows:

Protection of Castletroy Golf Club & Boundary Measures

- Support Castletroy Golf Club in its objection; the golf course is an important amenity that should be protected.
- A buffer zone within the development should be planted with appropriate trees and securely fenced to protect the golf course boundary, with restricted access.

Preservation of Existing Features (Wall & Trees)

- Support residents of Mount Green in preserving the existing boundary wall and line of trees.
- The proposed zebra crossing should be relocated closer to the water tower to avoid removal of these features.
- A boundary wall (as included in original planning permissions) should be constructed prior to any development to ensure privacy and separation between estates.

Traffic Safety & Road Infrastructure Concerns

- Increased traffic through Mount Green would:
- Endanger residents, particularly children playing on the road.
- Increase the likelihood of collisions and unsafe driving behaviour.
- Existing infrastructure is unsuitable for additional traffic due to:
- Narrow road width and constrained entrance at Mount Green / Golf Links Road.
- Inadequate sightlines at the junction.
- On-street parking (especially at Nos. 20–26) further reducing visibility.
- These constraints create a significant road safety risk for all users.

Construction Traffic Impacts

- The rejection of construction access via Mount Green on safety grounds is welcomed.

- Allowing construction traffic (whether via Mount Green or through the estate) would:
- Pose public health and safety risks.
- Cause noise, vibration, dust, and air quality issues.
- Result in loss of residential amenity.
- These impacts have not been adequately assessed.

Access Strategy & Planning Concerns

- All traffic should be routed through the main Caislean Nua entrance rather than Mount Green.
- Allowing access via Mount Green would contradict earlier planning decisions where such access was proposed and later removed and set an undesirable planning precedent.
- The proposed access represents a material alteration to the development and significantly changes its impact.
- There is no justification for linking the two established estates under the guise of “inclusivity.”

Impact on Residential Amenity & Quality of Life

- Increased traffic would, reduce quality of life within Mount Green, lead to environmental degradation within the estate and cause loss of privacy, increased noise, and light disturbance.
- Overflow parking and increased vehicle movement would further disrupt the residential character of the area.

Specific Property & Layout Concerns

- Concern regarding the proximity of the proposed entrance to No. 23 Mount Green and its impact on accessibility.
- Duplex Block 4 is considered inappropriate due to, insufficient setbacks, height and siting, finished floor levels relative to site gradient.

- The block would negatively impact light, enjoyment of nearby homes, and property values.

Conduct & Community Impact

- Residents feel poorly treated regarding removal of trees and boundary issues and loss of privacy.
- Concerns that the new access is being proposed for the developer's convenience rather than proper planning reasons.

Key Request

- Request that An Coimisiún Pleanála refuse permission for access via Mount Green.
- Direct all vehicular and construction traffic through the primary Caislean Nua access route instead.

8.3. Further Observations

8.3.1. Three (3 no.) further observations were received following the subsequent third party appeals (on foot of the leave to appeal applications). The issues raised have been summarised as follows:

Access and Road Design

- Mount Green Residents wish to confirm that no form of access whether temporary, construction related or permanent is acceptable via Mount Green Road.
- The principle of routing development-related traffic through a constrained residential cul-de-sac. This road was never designed, nor is it physically suited, to serve as an access route for any incidental large-scale developments.
- Concerns in relation to the suggestion that construction traffic or pedestrian connectivity associated with the development could be routed through Mount Green estate.

- Introducing construction traffic or creating new connections between Mount Green and the neighbouring Caisleán Nua estate would raise significant concerns in relation to road safety, planning history, residential amenity and the protection of existing infrastructure and biodiversity.
- Introducing regular construction traffic associated with a separate development would fundamentally change the function of these streets from serving local residential use to accommodating heavy vehicle movements generated by an external development.
- Introduce heavy construction vehicles onto roads not designed for such traffic.

Safety Risks

- Mount Green contains a number of families with young children as well as older residents who regularly walk through the estate. Pedestrians and children utilise the entire road network up to and including the main entrance.
- The internal road layout includes narrow residential streets with bends, gradients and restricted sightlines. These conditions naturally reduce visibility and driver reaction time.
- Introducing construction related traffic into this residential environment would create avoidable safety risks for pedestrians, particularly children travelling through the estate.
- Create unacceptable safety risks for children and vulnerable residents.

Entrance at Mount Green

- The entrance from Mount Green onto Golf Links Road is considerably narrower than the entrance serving the neighbouring Caisleán Nua estate.
- Two cars cannot comfortably pass through the entrance at the same time.
- Drivers frequently have to wait for oncoming traffic to clear before proceeding.
- This demonstrates that the junction already operates with limited capacity under normal residential traffic conditions.
- Introducing construction vehicles would further restrict manoeuvrability and increase the risk of conflict between vehicles and pedestrians.

Planning History

- The planning history of the development indicates that Mount Green was not originally intended to serve as a construction access route. A separate construction entrance previously existed along Golf Links Road which allowed construction vehicles to access the development lands without passing through established residential estates.
- It is understood that Limerick City and County Council later required this entrance to be closed following enforcement action when the associated planning permission expired.

Loss of residential amenity

- The existing environment is characterised by established concrete boundary walls and mature trees that define the residential character of the estate, and the proposed access strategy necessitates the destruction of these boundaries and the removal of mature planting, leading to a direct and permanent loss of residential amenity.
- Mount Green Road already accommodates a range of large service vehicles, including refuse collection trucks and other vehicles servicing the estate, in addition to occasional heavy vehicles accessing the nearby water tower infrastructure. Residents are very aware of the impact when these larger vehicles pass through the estate.
- Allowing pedestrian, vehicular or construction access from the neighbouring Caisleán Nua development would negatively impact the residential amenity and character of the estate.
- The introduction of regular construction vehicle movements through its internal road network would expose residents to prolonged construction-related impacts including noise, traffic conflict and disturbance.
- The impacts associated with the construction of the development should be contained and managed within the development site or its own access network, rather than imposed upon an existing residential estate.
- Mount Green and Caisleán Nua are two distinct residential developments with their own road networks and residential character. Maintaining clear and

defined boundaries between residential estates helps preserve residential amenity and prevents unnecessary through-movement of traffic.

Loss of Trees and Impact on Biodiversity

- The proposal to remove a grass verge containing approximately twenty-five mature trees in order to construct a two-metre footpath would result in the unnecessary loss of established vegetation and local biodiversity.
- Mature trees play an important role in supporting urban biodiversity, improving air quality, providing shade and contributing to the environmental character of residential areas.
- A functional pedestrian footpath already exists on the opposite side of the road. The construction of an additional footpath would therefore provide little practical benefit while resulting in the removal of mature landscaping that has developed over many years.
- The retention of mature trees within established residential areas is widely recognised as an important element of sustainable urban planning.

Focus of Appeals

- Recent appeals focus narrowly on the immediate impacts of construction traffic within their own estate. However, by doing so, they fail to engage with the broader planning consequences.
- These appellants seek to preserve an arrangement that displaces all negative access impacts onto Mount Green.
- The arguments raised in the most recent third party appeals do not possess the planning substance required to displace the core deficiencies identified in the Mount Green Residents' appeal.
- Pedestrian and child activity is not confined to areas immediately adjacent to individual dwellings, as suggested in the appeals, but occurs throughout the estate roads, including the section leading to the proposed access point.
- The appeals contain outdated photographic evidence. The appeal documentation includes photographs showing a corrugated fence at the

proposed access location. However, this fence has since been replaced by the permanent wall constructed in 2024.

- The appeal documentation also attempts to justify the use of Mount Green by comparing road widths. However, the comparison presented does not compare equivalent road environments.
- The appeals rely in part on outdated or inaccurate evidence regarding site conditions.

Boundary Wall

- The suggestion that the recently constructed boundary wall could be removed to accommodate construction access is particularly concerning.
- Residents campaigned extensively to have this wall constructed in order to clearly define and protect the boundary of the estate.
- The demolition or removal of this wall in order to facilitate access would undermine the considerable efforts made by residents and the local authority to establish this boundary and would represent a significant reversal of those efforts.

Design Decision

- The applicant previously possessed a viable internal access route within Caisleán Nua lands and made a deliberate design decision to build over that route.
- The consequences of that decision, namely the lack of appropriate access, are now being redistributed onto the residents of Mount Green.
- It is submitted that a developer's choice to maximise site density at the expense of proper access should not constitute a planning justification for infringing upon an adjacent residential estate.
- It is unreasonable for the residents of Mount Green to bear the impacts of construction traffic as a result of earlier development decisions.
- The issue arose from development phasing and access decisions rather than unavoidable site constraints.

Residual Land

- The Planning Authority's report expresses concern regarding the creation of a 'dead' or residual space at the side of No. 59 Caisleán Nua.
- It is respectfully submitted that this issue arises solely from the boundary alignment required to extend to the water tower. This space has no functional or amenity value for the Mount Green development and was not sought by the Residents Association.
- If the Planning Authority deems this residual space undesirable, a practical and proportionate solution exists: this land should be incorporated into the curtilage of No. 59 Caisleán Nua. The owner of that property is best positioned to manage and benefit from the area.
- This 'boundary rationalisation' would resolve the Planning Authority's concern without undermining the integrity of Mount Green.

8.4. Planning Authority Response

- 8.4.1. The Planning Authority responded on 12th January 2026 and noted that the Planning Authority have no further comments to make outside that of the assessment of planning application 25/60271, which is found in the appropriate Planner's Reports, available on the Council's Planning Enquiry System.

8.5. Applicant's Response

- 8.5.1. The applicant provided a detailed response on 21st January 2026, I have summarised the key points as follows:
- The applicant is satisfied that the design proposal is an appropriate response to the site location and context.
 - The proposal has due regard to the provisions of the Limerick Development Plan, 2022 – 2028.
 - The appeal statement largely reiterates objections made at application stage and fails to engage meaningfully with the planning authority's comprehensive

assessment, the planners report, the further information process or the conditions attached to the grant of permission.

- Concerns raised in relation to residential amenity including overlooking, loss of privacy, daylight and sunlight impacts, have been robustly assessed and dismissed.
- Separation distances exceed minimum policy standards, independent daylight and sunlight assessments confirm compliance with guidelines.
- The Planning Authority was satisfied that no unacceptable impacts would arise.
- Issues raised in respect of traffic, parking and safety have been comprehensively addressed.
- Updated traffic surveys including a revised Traffic and Transport Assessment, confirm that the surrounding road network will continue to operate within capacity with no material congestion or safety concerns arising.
- The parking provision accords with the Development Plan policy and is complemented by a Mobility Management Plan that actively promotes modal shift in line with national and local sustainability objectives.
- The decision to grant permission reflects a balanced, evidence based assessment of the proposal against national, regional and local planning policy.
- An Coimisiún Pleanála are urged to uphold the decision to grant permission.

8.5.2. Subsequently, the applicant submitted a further response to the appeals on 5th February 2026, I have summarised the key points as follows:

- The Applicants consider that nothing presented that would warrant the setting aside of the decision of the planning authority to grant permission.
- The principle of residential development on the subject lands is consistent with design objectives of the development plan and national policy promoting capability, sustainable settlement patterns, and housing delivery in metropolitan suburban locations.

- The appellants did not challenge the fundamental acceptability of the proposal but rather is based on site specific amenity, access and operational concerns, all of which were comprehensively addressed by the planning department.
- The decision to grant permission to follow the detailed and balanced assessment supported by independent expert documentation. The planners report demonstrates that all material planning considerations raised by third parties were identified, evaluated and addressed.
- There were no substantive concerns or objectives from the road section regarding the use of the L1161 as a vehicle access to the proposed development.
- Concerns raised regarding overlooking, loss of privacy, overshadowing, visual dominance, boundary treatment and levels are not supported by objective evidence.
- Independent daylight and sunlight analysis confirms compliance with BRE guidelines and demonstrates that no material adverse impact on neighboring residential community would occur.
- The proposed net density accords with the Compact Guidelines, and the minimum density objectives of the Development Plan for suburban edge locations. The inclusion of duplex and apartment units reflect national policy objectives for housing delivery and does not itself constitute excessive or inappropriate density.
- Appeals relating to traffic congestion, road safety, vehicles access via the L1169 Mount Green Road, and the construction access have been comprehensively reported upon.
- Temporary construction access from the L1161 represents the least disruptive and safest option and avoids significant impacts on the established existing environments.
- It is argued that Mount Green Road is wider, is similar to the construction access used in the earlier phases and there is no logical reason as to why construction access at the same location would not be acceptable.

- The proposed construction access would be positioned to the west of the existing dwellings in Mount Green, thereby reducing impact.
- The position of the construction entrance in Caislean Nua would result in construction traffic passing an established residential development.
- It is submitted that the temporary construction access be maintained in the originally proposed location.
- The appeal by Castletroy Golf Club concerning errand golf balls does not constitute a sustainable planning ground for refusal.
- Residential development on the subject site has long planning history predating the redesign of the golf course in the mid-2000s. The layout of the proposed development incorporates substantial buffers, setbacks and retained boundary features, consistent with historic inspector findings that responsibility for public safety does not rest solely with the adjoining landowner.
- The decision to grant permission was a balanced, evidence based assessment of the proposal against national, regional and local planning policy, including objectives related to compact growth, sustainable mobility, housing delivery and protection of residential amenities.
- An Coimisiún Pleanála are urged to uphold the decision to grant permission.

9.0 Assessment

9.1. Introduction/Context

- 9.1.1. An Coimisiún Pleanála received **10 no.** third party appeals on a large scale residential development for 144 no. residential units consisting of dwellings and apartments, creche and all associated site works. As noted above, and following the grant of three no. leave to appeal applications on this site, **2 no.** further third party appeals were submitted (totalling 12 no. third party appeals).
- 9.1.2. 6 no. observations were made in respect to the proposed development, and 3 no. further responses were received on foot of the two additional third party appeals, submitted following the decision to grant the leave to appeal applications. The key

issues have been summarised above and will be considered, where relevant, in my assessment to follow.

9.1.3. The Limerick City and County Council planners' report considered the proposed development to be acceptable; accordingly, permission was granted subject to 23 no. conditions as noted in Section 5.1.1 above.

9.2. Therefore, the following are the main issues I consider to be pertinent in my assessment of this third party appeal:

- Principle of Development and Policy Compliance
- Access/Construction Access, Traffic, Safety and Parking Issues
- Impact on Character of the Area
- Impact on Residential Amenity
- Adjoining Golf Course lands
- Other Matters

9.3. **Principle of Development and Policy Compliance**

9.3.1. The Planning Authority had no issue in relation to residential development on this site, considering it to be a greenfield site, which forms part of an overall housing development, with the appeal site forming the last remaining phase of the overall site to be developed. Moreover, the site is accessible to Limerick City Centre. The appellants/observers did not consider this to be an unsuitable site for residential development, and their concerns relate more to the proposed access onto Mount Green, the proposed construction access, parking, the proposed duplex blocks, impact on residential amenity, impact on trees, impact on biodiversity, impact on the character of the area and other miscellaneous matters. Concern was expressed about the boundary wall, the previous permitted development on site and the procedural matters in respect to the planning application.

Zoning

9.3.2. The appeal site is on lands zoned in the Limerick Development Plan 2022 – 2028 for “new residential” development, which has the objective to “*To provide for new residential development in tandem with the provision of social and physical infrastructure*”. I note that the purpose of this zoning objective as stated in the

Development Plan is *“intended primarily for new high quality housing development, including the provision of high-quality, professionally managed and purpose built third level student accommodation. The quality and mix of residential areas and the servicing of lands will be a priority to support balanced communities. New housing and infill developments should include a mix of housing types, sizes and tenures, to cater for all members of society. Design should be complimentary to the surroundings and should not adversely impact on the amenity of adjoining residents. These areas require high levels of accessibility, including pedestrian, cyclists and public transport (where feasible). This zone may include a range of other uses particularly those that have the potential to facilitate the development of new residential communities such as open space, schools, childcare facilities, doctor’s surgeries and playing fields etc.”*.

- 9.3.3. In this regard, the site is suitably zoned for residential development, including childcare facility and, therefore, I am satisfied that the principle of the development is acceptable in terms of the zoning objective of the Limerick Development Plan 2022 – 2028.
- 9.3.4. The site is identified as Tier 1, serviced lands, in the Settlement Capacity Audit (Volume 2a), and as per Table 2.4 Limerick Settlement Hierarchy the site is within the settlement hierarchy of Level 1 Limerick City and Suburbs (in Limerick), Mungret and Annacotty’, which includes Limerick City and Suburbs (in Limerick), Mungret and Annacotty.
- 9.3.5. In respect to compact growth, the Development Plan highlights that consideration must be given to the delivery of Housing Strategy in order to meet the increasing projected population, changing household size and housing needs, including social and affordable housing requirements of Limerick over the lifetime of the Plan.
- 9.3.6. The Core Strategy identifies a population growth target of 34,692 in Limerick City and Suburbs (in Limerick), Mungret and Annacotty to 2028. This has been reflected in Policy CGR P3 - Level 1 Growing Limerick City and Suburbs (in Limerick) Mungret and Annacotty of the Plan, which echoes National guidance that at least 50% of all new homes will be located within the existing built-up footprint of the settlement, in order to deliver compact growth and reduce unsustainable urban sprawl.

9.3.7. Therefore, having regard to the zoning objective pertaining to the lands and the guidance referenced in the Development Plan in respect to the development of residential growth with particular reference to the delivery of Tier 1 lands during the lifetime of the Plan, and the location of the at the edge of a regional city, the principle of residential development on the lands zoned new residential is acceptable.

Density and Height

- 9.3.8. The issue of density and height are linked and have been raised in the appeals/observations as concerns, as it is considered that the proposal fails to provide any graduation in height or massing where higher-density development interfaces with established housing. Concern is also raised in respect to the proposed three storey nature of the proposed duplex block and its height relative to the existing ground levels.
- 9.3.9. As per Table 2.6: Density Assumptions per Settlement Hierarchy of the Limerick Development Plan, the site is located in a **Density Zone 3: Suburban Edge**, which provides for a minimum net density of 35+ dwelling units per hectare.
- 9.3.10. I also reference the 'Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities', Table 3.2 which states that the recommended density of development for '**Suburban/Urban Extension**' in the range of 35 dph to 50 dph (net). I also note that the site is located south of the proposed future Bus Connects network and, therefore, having regard to Table 3.8 of the Guidelines, I consider that the site is located in an **Intermediate Location**. These guidelines have a specific focus on the renewal of existing settlements and on the interaction between residential density, housing standards and placemaking to support the sustainable and compact growth of settlements. The Guidelines note that to achieve compact growth it will be necessary to increase the scale and density of development of sites, particularly in locations served by existing facilities and public transport.
- 9.3.11. The proposed housing density is 35 dwelling units per hectare (dph) net based on the proposed 114 no units on a net development site area of 3.25 hectares.
- 9.3.12. The planner's report considered the proposed development to be in line with the density requirements of both the Limerick Development Plan and the Sustainable Residential Development and Compact Settlements Guidelines.

- 9.3.13. Having regard to the Development Plan, I am satisfied that the proposed density accords with the minimum housing target and also is appropriate in the context of the site location within the existing Caislean Nua residential development, where higher densities have been permitted. The proposed development also accords with the recommend density for the sites located as identified in the Compact Guidelines which identifies a range of 35 – 50 dup (net). Therefore, I am satisfied that the proposed density is acceptable having regard to the urban location of the subject site, its general character, pattern development and the existing service provision therein, and that the density as proposed accords with the target residential density identified in the Development Plan.
- 9.3.14. The Limerick Development Plan recognises that in order to increase density there may be a need for the development of higher buildings, and the development plan includes a Building Height Strategy for Limerick City. This is a detailed strategy and identifies particular parts of the city that may be suitable for taller/ high buildings. The strategy notes that “substantial land banks within the existing built-up suburban area should be informed by a Masterplan and comply with SPPR 4 of the Building Heights Guidelines. In this regard a greater mix of building heights and typologies is supported i.e. typically a mix of town-houses (2-3 storeys), duplexes (3-4 storeys) and apartments (4 storeys upwards)”, these will be access on a case-by-case basis.
- 9.3.15. The subject site is located within Castletroy, and therefore I reference “*Building Height Strategy – Castletroy/University of Limerick*”. The area objectives for Castletroy, as per the Building Height Strategy include that any proposed height should be in line with the planned, coordinated and sustainable development of Castletroy and a modest increase in building height may be required to enhance the legibility and sense of place.
- 9.3.16. The proposed building heights will range from 8.7 – 11.9 metres for the proposed Duplex Block Nos. 1 – 4, (three storey in height) with the proposed apartment blocks A and B at a height of 13.3 metres (four storey in height). The proposed duplex blocks 1, 2 and 4 are located to the northern section of the site, with the proposed duplex block 3 located to the southern portion of the site. The proposed apartment blocks are to the south eastern corner of the site.

- 9.3.17. The appeals express concern with respect to the height of the scheme, in particular the proposed duplex block 4. The proposed duplex block 4 addresses the existing dwellings (Nos. 53-55 Caislean Nua) to the west and the side elevation of an existing dwelling (No. 60 Caislean Nua) to the south. The proposed duplex block is some 20 metres from the front elevation of the dwellings at Nos. 53-55 Caislean Nua. Whilst I acknowledge that the proposed duplex will be visible from the front of the aforementioned dwellings, the proposed unit is positioned to the front and side of the existing dwellings within Caislean Nua, with a set back of some 20 metres and represents a modest increase in height from the existing context within Caislean Nua. Therefore, I do not consider the proposed height of this duplex unit to be excessive in the context of a housing development.
- 9.3.18. Therefore, I am satisfied that the proposed building heights are acceptable in this location. From my site visit I note that the existing site does give an appearance of a semi-complete development, especially when viewed from within the existing Caislean Nua development and as viewed from the adjoining Golf Course lands, to the east, and the Mount Green residential estate, to the north and northwest, and I would suggest that the proposed development upon completion would present a more complete appearance, allowing for a better integration with the existing area.
- 9.3.19. Reference is made in the third party appeals to Objective HO O3, which requires new developments to ensure a balance between the protection of existing residential amenities, the established character of the area. Having regard to the proposed layout, relative to the existing development on site, and that this proposal is for the final phase of the overall Caislean Nua scheme, I consider that the proposed development has been carefully considered in terms of layout, density, building lines, setbacks and positioning on site, is appropriate in this location, will not impact on the existing visual amenity of the area nor appear visually overbearing. The impact on residential amenity is further considered in Section 9.6 below.
- 9.3.20. I am satisfied that the proposed layout, density and heights are acceptable in terms of the Limerick Development Plan, 2022 – 2028 as well as national guidance and will provide for a development that will integrate with the existing area.

National Policy and Regional Guidelines

- 9.3.21. In terms of national and regional guidance, I reference the NPF (First Revision), within which compact growth is identified as a National Strategic Outcome of the NPF. As required under the NPF, 50% of future population and employment growth will be focused in the existing five cities and their suburbs, as per National Policy Objective 4 of the NPF.
- 9.3.22. I reference the RSES in respect of Limerick-Shannon Metropolitan Area Strategic Plan (MASP), in particular Policy Objectives 1 and 2 to achieve compact growth and regeneration and consolidation of development in Limerick city centre and suburbs. Policy Objective 5 to identify suitable sites for regeneration and development by a quality site selection process that addresses environmental concerns. Policy Objective 10 which seeks to support the environmentally sustainable densification of Limerick City Centre, the assembly of brownfield sites for development and the regeneration of suburbs to accommodate residential use. Policy Objective 21 seeks to deliver projects which can strengthen place making and public realm improvements.
- 9.3.23. The Development Plan reinforces these objectives and states *“Policy CGR P3 - Level 1 Growing Limerick City and Suburbs (in Limerick) Mungret and Annacotty It is a policy of the Council to strengthen and consolidate Limerick City and Suburbs (in Limerick), Mungret and Annacotty as a key driver of social and economic growth in Limerick and become a vibrant living, retailing and working City. In accordance with national and regional policy it is a requirement that at least 50% of all new homes will be located within the existing built-up footprint of the settlement, in order to deliver compact growth and reduce unsustainable urban sprawl”*.
- 9.3.24. As the proposed scheme includes apartment units, I also reference the Apartment Guidelines (2025), which states that *“The NPF was revised in 2025, reaffirming the Government’s commitment to Compact Growth. This includes a new approach to monitoring urban growth and a tool to track and compare urban development trends across the main urban settlements”*.
- 9.3.25. Accordingly, I am satisfied that the principle of the proposed large scale residential development on these lands, in particular the density and mix of units proposed accords with the relevant guidance noted above. Any other relevant Section 28 Guidance will be referred to in the following assessment.

Conclusion:

9.3.26. I am satisfied that the proposed development is acceptable in terms of the residential zoning that applies to this site and would be acceptable in the context of National and Regional Planning Guidance, based on the foregoing.

9.4. Access/Construction Access, Traffic, Safety and Parking Issues

9.4.1. The core focus of the third party appeals, leave to appeal applications and several observations relate to the proposed access arrangements to Mount Green from the proposed development and the negative impact this will have on the existing residents in terms of increased traffic and safety and the impact on the existing estate. Several appeals also relate to the proposed construction access arrangements, originally proposed under the parent permission for the site, and as conditioned by the planning authority as part of the recommended grant of permission (Condition 9), which redirects the proposed construction traffic via the existing development Caislean Nua, and the associated negative impact this will have on existing residents. Concerns have also been raised in respect of the proposed parking arrangement to serve the development which is considered insufficient (for occupiers and visitors) and will lead to on street parking and parking pressure. Compliance with relevant Development Plan policies and DMURS have also been raised as issues, such as safety, appropriate street hierarchy and the protection of existing residential amenity including avoiding "*segregated or disconnected street networks*" and instead promote "*coherent, integrated communities*".

Proposed Access and Layout

9.4.2. In respect to the proposed access, vehicular access to the site is via the Caislean Nua estate which accesses onto the Golf Links Road to the west serving the proposed apartment blocks A and B, and detached, semi-detached and terraced house to the southern portion of the site. A second access is proposed from Mount Green Road to the north of the site, which will serve the proposed creche, duplex units, terraced and semi-detached dwellings.

9.4.3. As noted above, several third party appeals and observations cite concerns in respect to the proposed access to the site from Mount Green, impact on the access and parking serving the existing dwellings at Mount Green, the increased traffic from

the development and the negative impact this will have on the residents in Mount Green, the suitability of the road for such traffic and the road network adjoining the site and safety.

- 9.4.4. Having regard to the position and width of the proposed entrance to Mount Green Road and the separation distance to the adjoining dwellings at Mount Green, I am satisfied that the internal road layout and proposed access points are acceptable. I also note that the Limerick City and County Council Roads Section were satisfied with the proposed access arrangement to the development site.
- 9.4.5. I note the concerns raised in the appeals highlighting that the proposal represents a two-tier development, with different densities, housing types and tenures separated by access arrangements. The appeals reference DMURS (2019), which requires that residential layouts avoid "segregated or disconnected street networks" and instead promote "coherent, integrated communities". However, I note that site is also located in an established urban area within an existing residential development and will form part of the final phase of this residential scheme. I consider that the provision of two access points to the site i.e. from Caislean Nua and Mount Green Road, will provide a more appropriate arrangement in relation to traffic flows, and volumes, etc. suited to the integration of the proposed scheme with the adjoining developments at both Caislean Nua and Mount Green.
- 9.4.6. The applicant submitted a Traffic and Transport Assessment (TTA) in support of the development with the proposed application and also submitted an updated TTA as part of the further information submission. The report also assesses the traffic impacts associated with existing uses in the area in tandem with the potential level of transport impact likely to be generated by the proposed development.
- 9.4.7. The original Traffic Assessment included traffic counts which were undertaken in 2024 at 3 key local junction locations including: Caislean Nua/L1116 Golf Links Road; L11161 Mount Green Road (Water Tower access)/L1116 Golf Links Road; and R445 Dublin Road/L1116 Golf Links Road/Milford Road junctions. The TTA submitted as part of the further information response includes traffic surveys undertaken during term time (29th September 2025) including local schools and the University of Limerick and the TTA was updated accordingly. The updated TTA also includes the construction phase vehicular trip generation (Table 3.1). I am satisfied

that the assessment presents an adequate account of traffic volumes for the area to assess the proposed development.

- 9.4.8. The traffic generation potential of the proposed development has been estimated using PICADY software. Table 3.2 of the TTA received as part of the further information, indicated the vehicular trip generation from the proposed development at both Mount Green Road, including the proposed creche and Caislean Nua.
- 9.4.9. It was estimated that the total vehicle movements generated by the proposed residential development accessing onto Mount Green Road will be 45 arrivals and 73 departures during the 08.00-08.59 (AM peak hour) and 43 arrivals and 33 departures during the 16.15-17.14 (PM peak hour), which includes the creche development.
- 9.4.10. It is estimated that the total vehicle movements generated by the proposed residential development accessing onto Caislean Nua will be 9 arrivals and 26 departures during the 08.00-08.59 (AM peak hour) and 17 arrivals and 11 departures during the 16.15-17.14 (PM peak hour).
- 9.4.11. I am satisfied with the accuracy and traffic generation figures presented for the scale of the proposed development. The assessment notes that it would be expected for the proposed crèche to serve residents of the proposed development and as such typical trip generation rates have been applied as external trips for this element of the development.
- 9.4.12. I also note that the planner's report did not raise any issues with regards to post development traffic flows. The Roads Section did outline a number of requests in term of roads layout, servicing of the site, public lighting, surface water and SuDs Management which were addressed by way of further information and condition.
- 9.4.13. As part of the junction analysis the following scenarios were modelled – 2029 (Opening Year), 2034 (Opening Year + 5 Years) and 2044 (Opening Year + 15 Years). Each year was modelled with and without development. The traffic network modelling assessment results revealed that the that the existing Caislean Nua/L1116 Golf Links Road junction will operate with spare capacity and minimal queuing in all of the scenarios tested. In 2044 with the proposed development there is 80% spare capacity in the AM peak hour and 92% spare capacity in the PM peak hour.

- 9.4.14. The modelling results also noted that the existing L11161 Mount Green Road (Water Tower access)/L1116 Golf Links Road junction will operate with large amounts of spare capacity and minimal queuing in all of the scenarios tested. In 2044 with the proposed development there is 81% spare capacity in the AM peak hour and 90% spare capacity in the PM peak hour.
- 9.4.15. The Traffic and Transport Impact Assessment has confirmed that the that the impact on the operation of the Caislean Nua/L1116 Golf Links Road and the L11161 Mount Green Road (Water Tower access)/L1116 Golf Links Road junctions is minimal whilst the R445 Dublin Road/L1116 Golf Links Road/Milford Road junction is predicted to be over capacity in the 2044 AM peak hour with the proposed development. Whether this situation materialises is dependent on other factors such as the actual impact of the 'Golf Links Road Upgrade Scheme', 'Castletroy Link Road Scheme' and wider Government sustainable and active travel initiatives. Accordingly, the assessments show that all of the junctions will continue to operate within capacity in all of the scenarios tested.
- 9.4.16. In this regard, I am satisfied that the proposed access arrangements and adjoining road network could safety and adequately accommodate the potential increased traffic levels as a result of the proposed development.

Construction Access and Condition 9:

- 9.4.17. In respect to the proposed construction access, the applicant originally proposed the construction access via Mount Green Road to the north of the site. The report received from the Road Section expressed concerns regarding the applicant's proposal to utilise Mount Green Road due to the impact of the proposed construction traffic on the existing units which use this road for access. It was further considered that the duration of construction activities would be extremely onerous for residents and was considered unacceptable. The Roads Section further noted that an alternative access option was available via the applicants own development lands at Caislean Nua, which is not in charge of the Council, specifically between existing houses Nos. 76 and 77, where a new junction is proposed to serve the development. It was considered that this route provides the shortest connection between the proposed development and the main entrance at Golf Links Road, with the roads of greater width and suitability for construction traffic. The Roads Section further noted

that this route was in the full control of the Applicant, thereby avoiding undue impact on third-party lands and residents. Uisce Eireann in their submission also highlighted concerns with the use of Mount Green Road for construction access proposed having regard to the location of the reservoir at the end of Mount Green Road, to the northeast of the appeal site, and that this route should not be restricted during construction works, in particular. Accordingly, Condition 9 was included requesting a revised site layout plan with respect to the proposed redesigned construction access route.

- 9.4.18. Third party concerns have been expressed with respect to the use of both Mount Green Road and Caislean Nua for the proposed construction access in terms of traffic issues and safety. Further responses to the appeals lodged on foot of the leave to appeal applications, counter argue the use of Caislean Nua as the construction access and reiterate the concerns regarding the use of Mount Green for construction access.
- 9.4.19. The applicant in their response considers that the proposed construction access via Mount Green would have lesser impact on existing amenities due to the position of the dwellings relative to the proposed construction access, whereby bringing the access road through the existing estate would directly impact 12 no. houses fronting onto the roadway and would negatively impact the use of a large area of open space internally positioned within the existing development.
- 9.4.20. Having reviewed the proposal and following my site visit, I concur with the planning authority with respect to their concerns regarding the proposed construction access via Mount Green Road. I also note the existing Uisce Eireann reservoir adjoining the site and the potential access impacts construction vehicles, etc. may impose on this access. I note that the potential construction access point to the site between the existing dwellings at 76 – 77 Caislean Nua, with a width of some 15.8 metres, and the existing width of the access road within the Caislean Nua development. I also note the distance from the proposed site to the main Golf Links Road via the Caislean Nua development. Therefore, I consider this access to be a more suitable construction entry and exit point for the proposed development in comparison to Mount Green.

- 9.4.21. Whilst construction traffic will pass through the existing Caislean Nua estate, I consider this to be a more appropriate route to the main Golf Links Road for construction traffic. The open space area within Caislean Nua is of sufficient size to not impact on its usability and/or safety if a construction access/route would be located within the existing estate.
- 9.4.22. I also note that the proposed site plan drawing indicates a new access road and junction between the existing dwellings at 76 – 77 Caislean Nua, therefore a new access route will be facilitated at this location within the development. Moreover, the proposed development forms part of the overall Caislean Nua scheme, and therefore I consider that the construction access should be facilitated through these lands and not via the adjoining residential development at Mount Green.
- 9.4.23. The planning authority also notes that the use of the existing road within Caislean Nua is within the applicant's ownership, not in the Council's charge, and as such undue impacts on third party lands and residents could be avoided. I concur with this assertion.
- 9.4.24. I acknowledge that some disruption will be expected during the construction period with respect to construction traffic, etc. however, I consider that utilising the existing route via Caislean Nua estate will aid in minimising the potential impact of construction on existing residents.
- 9.4.25. In accordance with the decision of the planning authority, I would also recommend the inclusion of a condition 9 with respect to an alternative construction access to the site via the existing Caislean Nua development. Furthermore, the applicant should be requested to submit an updated Construction Management Plan detailing the alternative construction access.

Safety

- 9.4.26. A number of concerns have been expressed in relation to safety in the adjoining estates as a result of the proposed development and increased traffic. While I acknowledge that there will be a greater volume of traffic as a result of the development, I am satisfied that the proposed access and egress arrangements to the site, in addition to the proposed footpath network within the scheme and externally via Mount Green Road would be acceptable with respect to traffic and pedestrian safety.

- 9.4.27. Section 7.5.13 of the Plan relates to Mobility Management Plans, with Objective TR O23 Mobility Management of the Development Plan in respect of Mobility Management Plans, and Objective TR O48 Traffic Management of the Plan relates to Traffic and Transport Assessment (TTA). Section 11.8.1 of the Plan relates to Access to Roads, Traffic and Transport Assessments (TTAs) and Road Safety Audits (RSAs), requires all applications to comply with relevant TII Publications in rural areas; the Design Manual for Urban Roads and Streets (DMURS) in urban locations and the Spatial Planning and National Roads - Guidance for Planning Authorities 2012, the Whole of Government National Disability Inclusion Strategy (NDIS) 2017-2022 and TII guidance and publications.
- 9.4.28. I note that the application is accompanied by a Road Safety Audit and the recommendations therein have been incorporated into the overall design proposal for the scheme and as such accords with the Development Plan, as noted above.
- 9.4.29. The planner's report does not reference the submitted Road Safety Audit. I note Condition No. 15 of the grant of permission which requires a revised Stage 2 Road Safety Audit, and Stage 3 Road Safety Audit for agreement. Should the Commission be minded to grant permission, I recommend the inclusion of a condition in respect of the submission of a final Road Safety Audits as noted in Condition No, 15, for the agreement of the Planning Authority prior to the commencement of development on site and prior to the occupation of the development.
- 9.4.30. Regarding children playing on the existing road in Mount Green and pedestrian safety both within the development and along Mount Green Road, the proposed development will provide green spaces within safe walking distance, i.e. along pedestrian footpaths from the existing Mount Green Road to the appeal site, which will provide a safer place for children in the vicinity to play. In terms of pedestrian safety, the existing footpaths will be retained and a new footpath and pedestrian crossing proposed along Mount Green Road.

Car Parking Provision and Access to Public Transport:

- 9.4.31. In respect of car parking, the proposed development provides 144 no. car parking spaces are proposed to be provided including 66 no. on-street car parking spaces and 78 no. car parking spaces within the curtilage of the proposed dwellings. Two no. car share spaces are also provided. I also consider that an adequate buffer zone

is to be provided between the proposed development and the existing adjoining houses to address concerns regarding nuisance from car parking

- 9.4.32. The planner's report raised no concerns in respect to the proposed parking and given the sites location considered that the provision of reduced car parking associated with the proposed development is considered generally acceptable.
- 9.4.33. Table DM 9 (a) of the Limerick Development Plan addresses car parking and bicycle parking requirements for Limerick City and Suburbs (in Limerick), Mungret and Annacotty according to the parking zones, the site is located within zone 3, but this is a maximum requirement. The applicant has chosen to provide for a lower level of car parking based on reducing car use, proposed public transport upgrades and walking/cycling connectivity in the area.
- 9.4.34. I note that the site is located south of the future Bus Connects network, c.850m from the proposed 10-min frequency route along the L1118 Plassey Park Road and c.500m from the proposed 15-min frequency route along the R445 Dublin Road. Therefore, I consider that the location of the appeal site allows for increased mobility. I also note the Mobility Management Plan, submitted with the planning application, which recognises the site location and encourages cycling, walking and public transport options. The report notes that a mobility management plan manager will liaise with the residents and the community to improve the accessibility of the facilities over time. I also note the car share spaces proposed within the scheme.
- 9.4.35. As such, I do not envisage an overflow of parking as a result of the proposed scheme, given the alternative transport options available in close proximity to the site. I am satisfied that adequate car parking will be provided to serve the development and complies with the Development Plan in this regard.
- 9.4.36. In respect to the proposed creche facility, I reference as per Table DM 9(a) 1 car parking space per 40sqm and a set down area is required as well as 1 bicycle space per 3 no. staff. The proposed creche has a floor area of 438 sq. m., which equates to 11 no. car parking spaces. As part of the proposal 11 no. car parking spaces, including 2 no. EV charging spaces, 8 no bicycle spaces and a set down area have been provided for the proposed creche. I am satisfied that the proposed parking and set down area for the proposed creche are acceptable and accord with the Development Plan requirements.

DMURS Compliance:

- 9.4.37. Reference is made in a third party appeal to Objective HO O3 of the Development Plan in respect to the Design Manual for Urban Roads and Streets (DMURS), and the Sustainable and Compact Settlements Guidelines 2024, all of which emphasise safety, appropriate street hierarchy and the protection of existing residential amenity.
- 9.4.38. The applicant submitted a Design Manual for Urban Roads and Streets Street Design Audit, which highlights the key DMURS reference and the proposed design response within the scheme, including the internal roads and footpaths designed and constructed in accordance with DMURS.
- 9.4.39. Objective HO O3 is an overarching housing policy objective. Having regard to the details submitted as part of the planning application, which demonstrates a collaborative design process that balances the needs of all users, including narrowed carriageways, well connected street networks, and linking to existing estates i.e. Mount Green and Caislean Nua and adjoining roads. The proposal also creates homezones creating a sense of place within the existing Caislean Nua development. I am satisfied, therefore, that the general principles of DMURS have been considered as part of the proposal and in this regard, I do not consider that the proposed development conflicts with Policy Objective HO O3 of the Development Plan.

Conclusion:

- 9.4.40. I am satisfied that the proposed road layout and access points are acceptable. I also recommend that the proposed construction access to the site is via Caislean Nua, as per Condition 9 of the local authority grant of permission. In general, pedestrian and cyclist provision are good within and to/ from the subject site. Adequate car parking is available on site, and the proposed bicycle parking provision will ensure that the opportunity for cycling is encouraged/ provided for.

9.5. Impact on Character of the Area

- 9.5.1. The Planning Authority raise no specific concerns regarding the layout of the development and the nature of the proposed scheme. The planner's report considered that the proposal represents a balanced approach to scale and form of development and has been pursued having regard to the established and prevailing

character of residential development in the area in particular the existing Caislean Nua estate of which this site forms part of. Furthermore, the planner's report considered that the layout of the proposed development has been dictated and informed by a number of site specific physical variables including the elevated nature of the site relative to the adjoining site at Caislean Nua. The appeals raised concern about the impact of the development on the character of the area both the proposed duplex units and access arrangement into Mount Green.

- 9.5.2. I have already assessed the proposed access arrangements in the forgoing section 9.3 of this report. I have also commented on the proposed density and building height. The appeals noted that this scale of the development is out of character with the predominantly two-storey residential context of the existing Caisleán Nua estate. I consider the unit mix consisting of **14% detached house, 38% terraced and semi-detached house, 14% 2-bed apartment, 17% 2-bed duplex and 17% 3-bed duplex**, to be appropriate in this location and will provide for a better housing mix in this area, within walking distance of Limerick City centre. The subject lands can be defined as a greenfield site and the scale and nature of development is appropriate for such a site, whilst ensuring that it will integrate with the existing form of housing in the area. I also note the site levels across this site, and I am satisfied that the layout and configuration of the proposed scheme responds to the site characteristics, and provides an appropriate design response to the site, whilst providing an appropriate density and mix for the area in line with the Development Plan.
- 9.5.3. As set out in the accompanying planning report and design statement and associated drawings, the proposed external materials include bonded brick of varying colour etc. This is appropriate having regard to the use of similar materials in the area on the existing houses.
- 9.5.4. Concern is raised in third party observations in respect to the removal of 25 no. trees within Mount Green and the negative impact this will have on the character of Mount Green. The proposed site plan indicates that part of the existing boundary wall will be removed to provide for a new footpath, green space and pedestrian access point to link to the existing footpath in Mount Green estate. However, the proposed site plan indicates that the existing trees along the access road within Mount Green, over a distance of some 138.9 metres, will be retained. The appellants noted that 36 metres of wall will be removed and 25 no. mature trees. Whilst some trees and

boundary wall removal is proposed (the proposed site plan drawing indicates the removal of approximately 16 metres of boundary wall) in close proximity to the proposed new access and entrance to the site, having regard to the proposed access arrangement to Mount Green, I do not consider the extent of existing boundary wall and tree removal to be excessive. Moreover, I consider this arrangement provides an attractive transition between the two developments and will not impact negatively on the character of Mount Green estate. Soft landscaping, and planting is also proposed to the northern boundary of the site, which fronts the existing dwellings at Mount Green, this will further soften the transition between the two estates.

Conclusion:

- 9.5.5. In general, I consider that the proposed development in terms of layout and integration with the existing area will be acceptable.

9.6. Impact on Residential Amenity

- 9.6.1. The Planning Authority raised no issues of concern in relation to impact from the development on existing residential amenity. Concern was raised in the appeals, however, with respect to overlooking leading to a loss of privacy and overshadowing leading to a loss of sunlight/ daylight in particular from the proposed duplex block. The lack of a sunlight or overshadowing assessment was also noted. Overbearing on existing properties was also raised in the appeals.

Impact on existing residential amenity:

- 9.6.2. The proposed site plan indicated the proposed separation distances between the proposed development and the houses on adjoining lands. Due to the size and shape of the site, separation distances vary. Concerns raised in respect to overlooking from the proposed development in particular from the proposed duplex block 4, and the directly adjoining dwellings at No. 55 Caislean Nua to the west. It is further considered that the planning authority did not fully assess the combined impact of unacceptable overlooking, height and massing, raised ground levels, overshadowing and loss of daylight which results in a serious erosion of residential amenity.

- 9.6.3. I note that the protection of privacy usually applies to the area to the rear of a property, front gardens and balconies can be excluded from such considerations. Therefore, concerns about overlooking from the proposed duplex block 4 and the adjoining dwellings to the west within Caislean Nua can be disregarded as the private amenity spaces of these properties are not overlooked.
- 9.6.4. The proposed development runs parallel to the rear of the existing dwellings within Caislean Nua, namely No. 60 – 70, with proposed stated separation distances of 22 metres and 24.9 metres from the side elevation of the proposed duplex and dwelling units. To the southeast of the site is the proposed detached and semi-detached dwellings address the rear gardens of Nos. 70 – 79 Caislean Nua, the proposed first floor separations distances of 13.7 – 14.8 metres, with separation distances of 23 metres from the rear of the dwellings at Caislean Nua. The proposed side elevation of a detached dwelling is some 14 metres from the existing dwelling at No. 79 Caislean Nua. Noting the aforementioned separation distances, I am satisfied that the proposed separation distances to the adjoining dwellings are acceptable and will not give rise to overlooking or loss of privacy of the adjoining dwellings. I note SPPR1 of the Sustainable Residential Development and Compact Settlements guidelines sets out a separation distance of 16 metres, and the proposed development exceeds this.
- 9.6.5. To the east the site adjoins a vacant greenfield site and to the south the site adjoins the Castletroy Golf Club lands, i.e. the car park and course associated with the club. The relationship with the adjoining Golf Club is assessed in further detail below.

Sunlight/Daylight:

- 9.6.6. Overshadowing and loss of daylight has been expressed by third parties. It also noted that no daylight, sunlight or overshadowing assessment was required.
- 9.6.7. Section 3.2 of the Urban Development and Building Height Guidelines (2018), refers to the criteria to be considered in assessing applications at the scale of the site/building and states that the form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light and that appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like BRE 2009 (2nd edition 2011)

or BS 8206-2: 2008. The Development Plan 2022-2028, the Apartment Guidelines (2023) and the Compact Settlements Guidelines (2024) refer to a more up-to-date version of the BRE 209 Guide from 2022.

- 9.6.8. I consider that this updated guidance provides a degree of flexibility and does not have a material bearing on the outcome of the assessment and that the relevant guidance documents remain those referred to in the Urban Development and Building Heights Guidelines and the Development Plan. A daylight and sunlight assessment is included with the application.
- 9.6.9. In designing new development, it is important to safeguard the daylight to nearby buildings. The development will be visible from the adjoining residential dwellings (within Caislean Nua) to the west of the site, from the adjoining development (Mount Green) to the north and the golf course to the south and east. In terms of the impact on the nearest dwellings the survey assessed the neighbouring dwellings that could be affected by the proposed development in terms of both daylight and sunlight, at Location A - No.26 Mount Green, Location B - No.54 Caisleán Nua, Location C - No.74 Caisleán Nua and Location D - No.79 Caisleán Nua. The report notes in respect to daylight that the closest existing dwellings were examined in accordance with the criteria set out in the BRE guidelines for a preliminary assessment in plan and section. The assessment indicated in each case that the proposed development does not subtend the 25° angle to the window wall of the existing houses and any reduction in available daylight is likely to be negligible. The proposed development meets the recommendations of the BRE guidelines BR209:2022 (third edition). With respect to sunlight the assessment noted all the private amenity space to the surrounding properties were assessed for sunlight in accordance with the recommendations set out in BR209:2022. On the 21st of March, all the amenity spaces will retain 2 hours sunlight over 50% of the area or will not be reduced below 80% of the existing levels. The proposed development meets the recommendations of the BRE guidelines (2002).
- 9.6.10. In this regard, I am satisfied that the development will not negatively impact the existing daylight/sunlight to the nearest residential dwellings, in terms of negatively impacting on existing outdoor recreation spaces.

Conclusion:

9.6.11. Therefore, I am satisfied that the development as proposed would not impact negatively on the residential amenity of the adjoining dwellings, in particular to the west of the site.

9.7. Adjoining Golf Course Lands

9.7.1. As noted above the site directly adjoins Castletroy Golf Club to the east and south. Concerns have been raised from the adjoining golf club regarding the location of the development within the known golf ball strike zone, the potential risk to residents and operation, safety, amenity impacts, legal liability of the golf club. It considers that the application is also missing a ball strike analysis and noise assessment and that the information submitted by way of further information is out of date and does not correspond with how the course currently operates. Reference is made to precedent set regarding security netting in Fingal County Council, and the Development Plan objectives with respect to golf courses. The appellant considers a central and fundamental error in the assessment of Planning Reference 25/60271 is the failure of the planning authority to apply the well-established agent of change principle¹. Various mitigation measures/conditions are requested.

9.7.2. As part of the planner's assessment, the applicant was requested, by way of further information, to submit proposals to protect the safety and amenity of residents of the development from the impacts of the operation and enjoyment of the golf course. As part of the response the applicant noted that it is the responsibility of Castletroy Golf Club to ensure that golf balls played from the 1st Tee and from other parts of the course were and are restricted from travelling into the adjoining lands. It also noted that the existing treeline and hedgerow along with the existing wall on the southern site boundary adjoining the golf course will be retained. The planner also noted the separation distance of the dwellings from the adjoining course and recommended a condition with respect to the retention of the existing boundary.

9.7.3. The appellant considers that relying on the retention of the existing boundary features, without a robust and enforceable mechanism to ensure long-term

¹ The appellant considers "This principle provides that when a new, more sensitive land use is introduced beside an existing lawful use, the responsibility for ensuring compatibility rests with the party introducing the new use, in this case, the residential developer".

protection, would fail to safeguard future residents and does not meet the standards of proper planning and sustainable development, and a permanent, durable, and effective boundary treatment-such as a 3-metre-high wall or equivalent protective structure-is required.

- 9.7.4. The appellant further considers that the development is placed in the golf ball strike zone, placing risks such as injury to residents and liability for the golf course. Concerns are raised regarding the course report submitted by the applicant. The appellants therefore requested that permission be refused and if granted has suggested that several mitigation measures are included in the development, at the developers cost, including the installation of 30-metre-high protective netting along the entire shared boundary with the golf course, execution and funding of all course reconfiguration works necessary in the vicinity of Hole 1 to ensure safety and operational continuity, and construction of a minimum 3-metre-high concrete block wall or twin wire mesh panel fencing, complemented by dense planting, along the full length of the boundary to prevent trespass and enhance security. It is also recommended that an expert noise impact assessment of the club's existing maintenance operations/workshops area and the full implementation of all related recommendations to address issues identified.
- 9.7.5. The applicant in their response to the appeals notes that the Golf Course at time of redesign and reconstruction failed to assess the operational realities of a golf course adjoining residential use. The proposed development seeks to retain the existing treeline, hedgerow and wall on the southern site of the site, with a substantial area of public open space and roadway separating the housing from the golf course. This was fully assessed by the planner noting the further information submission.
- 9.7.6. Following my site inspection, I note that there are presently no measures in place to ensure that balls from the golf course do not enter the adjoining lands either on the appeal site or the adjoining golf club lands i.e. there is presently no screen or mesh in place. While the applicant states that the boundary planting and wall to the south of the site will be retained, I acknowledge that the existing hedgerow and wall along the southern boundary of the site is inconsistent with no boundary wall present at the location from my site inspection. The boundary presently consists of intermittent fencing and sporadic planting.

- 9.7.7. I do not consider it appropriate to refuse planning permission for this reason as suggested in the grounds of appeal. Furthermore, I do not consider the proposed mitigation measures as suggested by the appellant are warranted on this site. Whilst I acknowledge the presence of the golf course, the appeal site is zoned for residential development and forms part of an existing residential estate. Furthermore, the layout of the proposed development has regard to the adjoining land use with an area of open space directly adjoining the southern site boundary.
- 9.7.8. Having regard to the potential impact on residents from the adjoining golf club regarding stray balls, I note that the save for the gable end terrace of dwellings to the southwestern corner of the site, all proposed dwellings are located a minimum of 21 metres from the southern boundary, however the proposed area of open space directly adjoins the golf course at this location. As such, I consider that measures to ensure the safety of occupants of the subject development from stray golf balls from the adjoining golf course are required to the southern site boundary in the form of a consistent boundary wall (to a minimum height of 2.5 metres) and mature planting and details of same should be submitted to and agreed in writing with the planning authority prior to the commencement of development on site.
- 9.7.9. The appellant also references Objective SCS1 O20 Protection of Sports Grounds/Facilities of the Development Plan, where it is an objective of the Council to ensure that adequate playing fields for formal active recreation are provided for in new development areas and to protect, retain and enhance existing sports facilities and grounds and considers that the proposed development conflicts with this objective. The proposed residential development is located on lands zoned for residential development, and forms part of an existing residential development. Therefore, I do not consider that the proposed development conflicts with this objective, the golf club is on the adjoining lands and does not form part of this application.
- 9.7.10. I note that the issues raised in respect to litigation are not a matter for the Commission.
- 9.7.11. The appellant considers that a fundamental error in the planning authority assessment is the failure of the planning authority to apply the 'agent of change principle' and while this is absent from Irish Statute, this does not diminish its

relevance where new residential development is proposed immediately adjacent to an established sporting use.

9.7.12. In this regard, I note that the development must comply with the land use zoning objective and the relevant policies and objectives of the relevant Development Plan and National and Regional guidance. There is no reference to the 'agent of change principle'. Notwithstanding, I consider that the onus is on both the developer and the adjoining landowner (i.e. the Golf Course in this instance), to have regard to the directly adjoining sites, the zoning objective pertaining to the lands, their existing use and any resultant impact on same. To this end, I note that the layout of the proposed development has been considered to minimise the impact on the directly adjoining sites to the north, east, west and south respectively given the proposed separation distances to the nearest adjoining residential dwelling and site boundary. I also note the existing residential development on site and that the development as proposed is an extension of this development, on lands zoned for residential development, which has been noted in the foregoing assessment. I consider that the retention and reinstatement of the boundary and additional planting as recommended will ensure that the proposed development will not negatively impact on the adjoining golf course lands and will protect the amenity of the appeal site.

9.7.13. In respect to noise, I note that a noise is assessed in the CEMP submitted as part of the planning application. I note that noise during construction will be temporary and will be controlled in accordance with relevant guidance. I do not envisage once occupied that the residential development would detract from the adjoining golf course in terms of noise or disturbance.

Conclusion:

9.7.14. Subject to appropriate mitigation measures along the southern boundary of the site, I am satisfied that the proposed development will not detract from the existing golf club on the adjoining lands to the east and south of the site.

9.8. **Other Matters**

This section assessing the remaining **planning relevant matters** raised in the third party appeals, observations and further responses as noted above.

Ecology

- 9.8.1. Concerns have been raised in third party observations in respect to the presence of bats on site and the potential impact of the proposed development on bats.
- 9.8.2. Notwithstanding the Screening for Appropriate Assessment and Environmental Impact Assessment Preliminary Examination submitted as part of the planning application, the applicant was requested by way of further information to submit an Ecological Impact Assessment to include a bat activity and roost suitability survey, a Flora Protection Order (FPO) plant species survey, and a badger survey.
- 9.8.3. In respect to bats, the applicant submitted a bat and bird survey of the site and notes that the site was inspected on 9th and 10th of July 2024 with no climatic constraints and no seasonal constraints in regard to bat survey as it was undertaken within the active bat/bird season. Daytime temperatures reached 22° Celsius and fell to 14° Celsius at dusk. There had been no rain throughout the previous hours. There was no rain during the dusk/dawn survey field work. The survey report notes that *“The site, potentially, offers few opportunities for bat roosts, as there is little available access to cavities within vegetation on site”* and *“There is evidence that bats are currently present foraging over the site. There are a small number of Leislars bat (C 5) foraging high (>20 m) over the site. Common Pipistrelles (Pipistrellus pipistrellus) appear to be foraging on the boundary of the site near Golf Links Road”*.
- 9.8.4. As there are bats and birds present on site, the survey suggests mitigation measures, the timing of the works and some general mitigation measures to protect nesting birds, to ensure that the proposed development would not adversely affect bats and bird species on site. The survey report also notes that a derogation licence is not required in this instance as the proposed works do not entail works on a known bat roost.
- 9.8.5. The proposed mitigation measures include the timing of the works:
- (i) No work shall be undertaken on site clearance until after bird nesting season (September 1st). Any site clearance shall be preceded by a site survey for hares (*Lepus timidus hibernicus*). The portion of the site to the rear bordering the Golf Course shall be left a Wild Flower to encourage foraging by Long Eared Owls.
 - (ii) Timing of the works until after September 1st will prevent negative impact on birds.

- (iii) Enhancement of bat roosts in the area Bat boxes shall be mounted on trees in the area.

- 9.8.6. It is anticipated that no bat roosts should be lost due to the proposed works, and the impact on avian species can be minimised if the recommended mitigation measures are followed.
- 9.8.7. In respect to FPO plant species, the applicant submitted a FPO Plant species survey following a site visit dated 9th September 2025. The survey lists all plant species protected by Section 21 of the Wildlife Act, 1976 is set out in the Flora (Protection) Order, 2022, (which supersedes orders made in 1980, 1987, 1999 and 2015), under Schedule A (vascular plants), Schedule B (Mosses), Schedule C (Liverworts), Schedule D (Lichens) and Schedule E (Stoneworts). The survey notes the species found on site during the survey and confirms that none of the species (Schedule A, Schedule B, Schedule C, Schedule D, Schedule E) listed in the FPO were found during field work.
- 9.8.8. The applicant also submitted an 'Invasive species survey of site', which references a site visit dated 9th July 2025, noting that field visits were undertaken to all points within the site. The results of the survey noted that Buddleia davidii appears to be the sole invasive non-native species present on site. It is noted within the survey report that there is rarely any necessity to eradicate Buddleia on sites as it does not compete well against new plantings associated with new developments. Therefore, the report concludes that as there is currently only one non-native invasive species on site in Castletroy. There is no necessity to eradicate this plant as the process of development will control its spread.
- 9.8.9. In respect to badgers, the applicant submitted a badger survey of the site and notes that the site was inspected on 9th and 10th of July 2024 with no climatic and seasonal constraints in regard to survey as it was undertaken within the active season.
- 9.8.10. The survey confirmed that there is no evidence that badgers have a sett on the site and no evidence that they forage on site. In this regard it is considered that the proposed works should not adversely affect badgers and as there are currently no badger setts in the areas under examination and no compulsory mitigation measures are necessary.

- 9.8.11. Reference is made in the third party appeals in relation to hedgehogs in the adjoining residential estate (Mount Green) and the impact of the proposed development, in particular the increased traffic on the species. While I acknowledge that hedgehogs may be present within the adjoining residential estate, this is within an established residential area, which is already subject to traffic movements. There is no reference to hedgehogs within the appeal site as per the submitted environmental assessment. Therefore, I do not envisage that the development would be detrimental to the existing species referenced in the appeal.
- 9.8.12. I note the planners report, which states *“based on the information submitted regarding bats, FPO species and badgers, the assessment by the LCCC Ecologist, as well as the nature, size and location of the development it is considered that there is no real likelihood of significant effects on the environment”*.
- 9.8.13. I also note the report received from the Department of Housing, Local Government and Heritage, which referenced that any proposed machinery operation works should be carried out outside of bird nesting season 1st September and any ground works include the alteration or removal of hedgerows or trees on site, this is to be undertaken outside of the bird nesting season 1st March to 31st of August. This accords with the mitigation measures noted in the applicants’ survey.
- 9.8.14. I am satisfied that having regard to the surveys carried out and the proposed mitigation measures noted in the bat and bird survey report, in particular that the proposed development will not negatively impact ecology, in particular bats, plant species and badgers. If the Commission were minded to grant permission a condition could be attached to ensure that the development be carried out in accordance with the proposed mitigation measures outlined in the submitted Bat and Bird Survey.

Legal and Procedural Issues

- 9.8.15. Reference is made in the third party observations to the planning history and issues in relation to the construction of a boundary wall. I note that the matter of enforcement falls under the jurisdiction of the planning authority and is not a matter for the Commission.
- 9.8.16. In addition, reference is made in a third party observation to the fact that the planning authority did not follow correct planning procedures in relation to the further

information request and is legally invalid. In terms of procedural matters and the alleged irregularities in terms of the nature and timing of the further information, I note that these matters were considered acceptable by the planning authority.

9.8.17. Reference is made to a request for a Tree Preservation Order (TPO) to protect the trees in Mount Green, which are considered an intrinsic part of the beauty and heritage of Mount Green. Tree Preservation Orders (TPOs) are legal protections administered by County Council's under the Planning and Development Act 2000, as amended, and is not a matter for the Commission.

Boundary wall(s)

9.8.18. Concerns are raised in respect to the existing fencing and boundary wall with the adjoining development at Mount Green and any modifications to the existing wall as constructed. Concerns are also raised regarding historic permissions on site and the implementation of same.

9.8.19. This is, however, a civil matter to be resolved between the parties, having regard to the provisions of s.34(13) of the 2000 Planning and Development Act.

9.8.20. Moreover, any deviation from the permission originally permitted and constructed on site is a matter for planning enforcement, which falls under the jurisdiction of the planning authority.

9.8.21. Social Infrastructure:

9.8.22. Concerns are raised in the observations in respect to the lack of existing local services to cater for the increased population i.e. playgrounds, library, and public amenity spaces for example.

9.8.23. I note that the application site includes a two storey creche. The proposed creche is located at the northern boundary of the site, to the northern edge of the development, immediately adjoining the main spine road. The proposed creche has a floor area of 438 sq. m. with a capacity for 48 no. children. A dedicated creche play area is provided to the rear of the building.

9.8.24. The Childcare Facilities: Guidelines for Planning Authorities, 2021 requires one childcare facility per 75 dwellings in new housing developments. This is also echoed in Section 10.6 of the Development Plan and Objective SCS1 O14 Childcare Facilities.

- 9.8.25. Having regard to the zoning objective pertaining to the site, 'new residential', I note that Childcare Facility is open for consideration under this land use zoning objective.
- 9.8.26. Furthermore, as outlined in the application documentation, the creche is intended to serve not only the residents of the proposed development but also to accommodate families from other residential developments in the area. In this regard the proposed creche will enhance the overall provision of childcare services in the area. If the Commission were minded to grant permission a condition should be attached that the proposed creche is delivered in phase 1 of construction to ensure its timely delivery.
- 9.8.27. The applicant submitted a social infrastructure audit which assessed the proposed development on existing facilities in proximity of the proposed site. The audit considers that the proposed development will generate a modest added demand on the existing services and facilities, including open space and leisure facilities. It identified adequate capacity in primary and secondary schools in the catchment to accommodate the development proposal and noted that the site is also well served by healthcare facilities and there are a number of GP clinics and pharmacies located in the area. There are several places of worship in Limerick within proximity of the site.
- 9.8.28. In this regard and as the proposal forms part of the final phase of an existing residential estate and is at the edge of Limerick City and served by existing facilities, I am satisfied that the proposed development will not cause undue pressure on the capacity of the existing social and community infrastructure in the area.

Residual Lands

- 9.8.29. I note the concerns raised in relation to the removal of the boundary wall on the northern part of the site adjacent to Mount Green Road and the request that this wall be constructed up the northern length of the site.
- 9.8.30. The planner considered that the creation of a boundary wall at this location would create a 'dead' space behind a wall and considered that a green space, as proposed adjacent to Mount Green would allow for additional landscaping to be planted and final details have been requested by way of condition.

9.8.31. I concur with the planning authority, in respect to this space and consider that an open green space would be more attractive at this juncture and would provide a better visual transition between the estates. If the Commission were minded to grant permission a condition could be attached to provide details of the proposed landscaping and planting at this location.

Devaluation of property

9.8.32. I note the concerns raised in the observation(s) in respect of the devaluation of neighbouring property. However, having regard to the assessment and conclusion set out above, I am satisfied that the proposed development would not seriously injure the amenities of the area to such an extent that would adversely affect the value of property in the vicinity.

10.0 Water Framework Directive (WDF)

10.1. Introduction:

10.1.1. The closest watercourse is the River Groody (a tributary of the River Shannon), which is approx. 1 km west of the site, which is a recorded waterbody on the EPA catchments database, i.e. GROODY_010 (IE_SH_25G050200).

10.1.2. In terms of the groundwater body, the Limerick City East Site Code: (IE_SH_G_138) is the applicable groundwater body and is a recorded waterbody on the EPA catchments database.

10.1.3. The proposed development comprises of the construction 114 residential units, childcare facility and associated site works on lands within an existing residential development at Golf Links Road and Mount Green Road, Newcastle, Castletroy, Co. Limerick.

10.1.4. I have assessed the residential development at Golf Links Road and Mount Green Road, Castletroy, and have considered the objectives as set out in Article 4 of the Water Framework Directive which seek to protect and, where necessary, restore surface & ground water waterbodies in order to reach good status (meaning both good chemical and good ecological status), and to prevent deterioration.

10.1.5. I have undertaken a WFD Impact Assessment Stage 1: Screening and which is included in Appendix D after my report. This assessment considered the impact of the development on the:

- Waterbody
- Groundwater

10.1.6. The impact from the development was considered in terms of the construction and operational phases. Through the use of best practice and implement of a CEMP at the construction phase and through the use of SuDS during the operation phase, all potential impacts can be screened out.

10.2. **Conclusion:**

10.2.1. I conclude that on the basis of objective information, that the proposed development will not result in a risk of deterioration on any water body (rivers, lakes, groundwaters, transitional and coastal) either qualitatively or quantitatively or on a temporary or permanent basis or otherwise jeopardise any water body in reaching its WFD objectives and consequently can be excluded from further assessment.

11.0 **Appropriate Assessment**

11.1.1. 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 (see Appendix A of this report), 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 (Site code: 2165) and the River Shannon and River Fergus Estuaries SPA (Site code: 4077) in view of the conservation objectives of these sites and is therefore excluded from further consideration. Appropriate Assessment is not required.

11.1.2. This determination is based on:

- The proposal including 114 no residential units, creche and all associated works which is part of an overall housing development, which has been developed on a phased basis.
- The distance from nearest European site and lack of connections.

12.0 Environmental Impact Screening

12.1. The applicant has addressed the issue of Environmental Impact Assessment (EIA) and submitted an EIA Preliminary Examination Report (Prepared by HRA Planning – Dated February 2025), and I will have regard to same. The submitted report concludes *“The preliminary examination confirms that there is no real likelihood that the proposed development, by reason of its ‘nature, size and location’ is likely to give rise to significant effects on the receiving environment, having regard to the following considerations:*

- *The development is of medium scale in the context of an urban environment;*
- *The land is appropriately zoned residential land the principle of which has already been subject to Strategic Environmental Assessment (SEA);*
- *The site is not ecologically or environmentally sensitive nor is it proximate to sensitive sites;*
- *The site comprises disturbed, recolonising bare ground;*
- *Neither the site nor the immediate surrounding area comprises designations or other environmental sensitivities.*

It is submitted to the planning authority that there is no real likelihood of significant effects on the environment and therefore EIA is not required. Because the requirement to carry out EIA has been excluded at preliminary examination stage, there is no requirement to proceed to Step 3 ‘Screening Determination’ and the information specified in Schedule 7A for the purposes of a screening determination is not required”.

12.2. The applicant submitted an EIA Screening Statement with the application, and I am satisfied that this document provides the information deemed necessary for the purposes of screening sub-threshold development for an Environmental Impact Assessment.

12.3. In respect to ecology and biodiversity, the report references that the proposed development is located within an area of built development, predominantly composed of local biodiversity value habitats and disturbed, recolonising bare

ground. The report further notes that there is an existing line of hedgerow to the north-eastern boundary there is a line of hedgerow with the southern boundary characterised by a treeline. The Appropriate Assessment Screening report confirms that these are habitats of local biodiversity value.

- 12.4. There is no specific reference to ecology within the preliminary screening report. However, I note that the applicant submitted a bat activity and roost suitability survey, a Flora Protection Order (FPO) plant species survey, and a badger survey by way of further information and as noted in Section 9.8 above, there will be no negative impact to ecology, in particular to bats as a result of the proposed development.
- 12.5. The various reports submitted with the application also address a variety of environmental issues and assess the impact of the proposed development, in addition to cumulative impacts with regard to other permitted developments in proximity to the site, and demonstrate that, subject to the various standard construction practices recommended, the proposed development will not have a significant impact on the environment.
- 12.6. I have had regard to the characteristics of the site, location of the proposed development, and types and characteristics of potential impacts. I have examined the sub criteria having regard to the Schedule 7A information and all other submissions, and I have considered all information which accompanied the application.
- 12.7. The EIA screening report prepared by the applicant has under the relevant themed headings considered the implications and interactions between these assessments and the proposed development, and as outlined in the report states that the development would not be likely to have significant effects on the environment. I am satisfied that all other relevant assessments have been identified for the purposes of screening out EIAR.
- 12.8. I concur with the Planning Authority in their Screening determination as follows;
“An AA and EIA Screening have been submitted as part of the application. Both have been reviewed by the Council Ecologist (23/05/25) and are considered acceptable”.

12.9. I consider that the location of the proposed development and the environmental sensitivity of the geographical area would not justify a conclusion that it would be likely to have significant effects on the environment. The proposed development does not have the potential to have effects the impact of which would be rendered significant by its extent, magnitude, complexity, probability, duration, frequency or reversibility. In these circumstances, the application of the criteria in Schedule 7 to the proposed sub-threshold development demonstrates that it would not be likely to have significant effects on the environment and that an environmental impact assessment is not required before a grant of permission is considered. This conclusion is consistent with the EIA Screening Statement submitted with the application.

Screening Conclusion:

12.10. Having regard to: -

1. The criteria set out in Schedule 7, in particular
 - (a) the nature and scale of the proposed development, within the existing site context
 - (b) the absence of any significant environmental sensitivity in the vicinity, and the location of the proposed development outside of the designated archaeological protection zone
 - (c) 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. Screening Report for Appropriate Assessment was provided in support of the application.
3. The features and measures proposed by 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.

12.11. A Screening Determination should be issued confirming that there is no requirement for an EIAR based on the above considerations – as noted in Appendix C of this Report (Form 3).

13.0 Conclusion

- 13.1. The application is for the construction of 114 dwellings, creche, ESB substation and associated site works on lands at Golf Links Road and Mount Green Road, Newcastle, Castletroy, Limerick. Ten (10 no.) third party appeals were received, eight (8 no.) observations and four (4 no.) further responses, were received and their concerns have been summarised and considered as part of my assessment.
- 13.2. The planning authority recommended a grant of permission and concluded that that the proposed development was fully compliant with the applicable zoning objectives. Its scale, height, and design are consistent with the established character of the surrounding area and reflect a considered approach to urban form. Furthermore, the planner's report considered that the proposal adheres to the standards set out in the Limerick Development Plan and relevant government guidelines, contributing positively to the sustainable growth and development of the area, and permission was granted on 12th December 2025, subject to 23 no. conditions.
- 13.3. The overall layout and design of the proposed scheme on these lands is acceptable and generally accords with the standards within the current Plan, and the zoning objective pertaining to the site, I concur that the construction access to the site should be via the existing Caislean Nua residential development, which is in the control of the applicant, to minimise the impact of construction on adjoining sites. Notwithstanding, the retention of the existing boundary to the south of the site, I also recommend that additional mitigation measures be included along the southern site boundary with the adjoining Golf Club lands in the interests of amenity and safety.
- 13.4. I consider that the proposed development is consistent with relevant updated section 28 guidance i.e., Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities, 2024, the National Planning Framework, and the Sustainable Urban Housing: Design Standards for New Apartments, 2025.
- 13.5. The AA concluded that adverse effects on the site integrity of the Lower River Shannon SAC (002165), and the River Shannon and River Fergus Estuaries SPA (004077), or any Natura Site and the proposed development can be excluded at Stage 1 Screening.

- 13.6. The EIA Screening determined that the development was below threshold in respect EIA and that the proposed development would not be likely to have significant effects on the environment and that the preparation and submission of an environmental impact assessment report would not therefore be required.
- 13.7. The WFD assessment concluded that the proposed development would not result in a risk of deterioration on any water body either qualitatively or quantitatively or on a temporary or permanent basis or otherwise effect any water body in reaching its WFD objectives.

14.0 **Recommendation**

- 14.1. Having considered the contents of the application the provision of the Development Plan, the grounds of third party appeal, the observations and further responses thereto, my site inspection and my assessment of the planning issues, I recommend that permission be GRANTED for the following reason and considerations and subject to the conditions outlined below.

15.0 **Recommended Commission Order**

Planning and Development Act 2000, as amended

Planning Authority: Limerick City and County Council

Planning Register Reference Number: 2560271

Appeal

Third Party Appeals by Charles and Shirley, Helen Enright, Castletroy Golf Club, Christopher Cole, Mary McGuinness, William and Kathy O'Halloran, Kevin and Caroline Muldoon and Others, Gerard Cosgrave, Alan and Sandra Moylan, Damien Naughton, Mount Green Residents and John Curtin against the decision made on the 2nd day of September 2025, by Limerick City and County Council to grant permission for the proposed development.

Proposed Development

Large-scale Residential Development (LRD) consisting of the construction of

114 no. residential units:

- (i) **16 no.** 2.5 storey 4 bed detached units;
- (ii) **8 no.** 2.5 storey 3 bed semi-detached units;
- (iii) **36 no.** 2.5 storey 3 bed terrace units;
- (iv) **19 no.** 3 storey 2 bed duplex units;
- (v) **19 no.** 3 storey 3 bed duplex units;
- (vi) **16 no.** 2 bed apartments provided within 2 no. 4 storey blocks;
- (vii) Associated parking (114 spaces) 66 no. on-street car parking spaces and 78 no. car parking spaces within the curtilage of the proposed dwellings with ancillary storage, bin stores and bicycle parking compounds;
- (viii) A standalone single storey creche building (173sqm) with associated external play area, set down and parking spaces (11no) and bicycle parking.

The proposed development also includes vehicular access provided from a new access road off Mount Green Road, all hard and soft landscaping, boundary treatments, surface water and foul drainage connections to existing network and all associated site and development works at Golf Links Road and Mount Green Road, Newcastle, Castletroy, Co. Limerick.

An Environmental Impact Assessment Preliminary Examination Report and a Screening Report for Appropriate Assessment have been prepared in respect of the development proposal and accompanies the application.

Decision:

GRANT permission for the above proposed development in accordance with the said plans and particulars based on the reasons and considerations under and subject to the conditions set out below.

Matters Considered:

In making its decision, the Coimisiún had regard to those matters to which, by virtue of the Planning and Development Acts and Regulations made thereunder, it was required to have regard. Such matters included any submissions and observations received by it in accordance with statutory provisions. In coming to its decision, the Coimisiún had regard to the following:

- (i) Policies and objectives set out in the National Planning Framework 2040 (First Revision, 2025) and the Regional Spatial and Economic Strategy for the Southern Region 2020-2032,
- (ii) Policies and objectives set out in the Limerick Development Plan 2022 – 2028, including the location of the site on lands subject to Zoning Objective New Residential where the objective is to provide for new residential development in tandem with the provision of the necessary social and physical infrastructure,
- (iii) Delivering Homes Building Communities 2025 - 2030, issued by the Department of Housing, Local Government and Heritage in November 2025,
- (iv) the provisions of the Sustainable Residential and Compact Settlement Guidelines for Planning Authorities (January 2024),
- (v) The Planning Design Standards for Apartments Guidelines for Planning Authorities, 2025,
- (vi) the Climate Action Plan 2024 and the Climate Action Plan 2025,
- (vii) National Biodiversity Action Plan 2023–2030,
- (viii) Urban Development and Building Heights, Guidelines for Planning Authorities, 2020,
- (ix) Design Manual for Urban Roads and Streets, 2013, updated 2019,
- (x) Childcare Facilities, Guidelines for Planning Authorities, 2001,
- (xi) Development Management, Guidelines for Planning Authorities, 2007,
- (xii) The availability in the area of a wide range of social and transport infrastructure,
- (xiii) To the pattern of existing and permitted development in the area,

- (xiv) Planning Report and supporting technical reports of Limerick City and County Council,
- (xv) To the submissions and observations received,
- (xvi) The grounds of appeal, observations and further responses on appeal,
- (xvii) The report and recommendation of the planning inspector including the examination, analysis and evaluation undertaken in relation to appropriate assessment, environmental impact assessment, and water status impact assessment.

Appropriate Assessment (AA):

An Coimisiún Pleanála completed an Appropriate Assessment screening exercise in relation to the potential effects of the proposed development on designated European sites, taking into account the nature, scale and location of the proposed development within a suitably zoned and adequately serviced urban site, the Appropriate Assessment Screening Reports submitted with the application, the Inspectors' Reports, and submissions on file.

In completing the screening exercise, An Coimisiún Pleanála adopted the reports of the Inspectors and concluded that, by itself or in combination with other development in the vicinity, the proposed development would not be likely to have a significant effect on any European site in view of the conservation objectives of such sites.

Environmental Impact Assessment:

An Coimisiún Pleanála completed an environmental impact assessment screening of the proposed development and considered that the Environment Impact Assessment Screening Report submitted by the applicant, which contains information set out in Schedule 7A to the Planning & Development Regulations, 2001 (as amended), identifies and describes adequately the effects of the proposed development on the

environment.

Having regard to:

- a) the nature and scale of the proposed development, which is below the threshold in respect of Class 10(b)(i) and 10(b)(iv) of Part 2 of Schedule 5 of the Planning and Development Regulations 2001, as amended,
- b) the location of the site on lands governed by Zoning Objective New Residential of the Limerick Development Plan 2022 – 2028 and the results of the Strategic Environmental Assessment of the Limerick Development Plan 2022 – 2028 undertaken in accordance with the SEA Directive (2001/42/EC),
- c) the greenfield nature of the site and its location at the edge of City location at Castletroy, which is served by public services and infrastructure,
- d) the existing use on the site and the pattern of development in the surrounding area,
- e) the planning history related to the wider area of the site,
- f) the absence of any significant environmental sensitivity in the vicinity,
- g) the location of the development outside of any sensitive location specified in article 109(4)(a) of the 2001 Regulations,
- h) The guidance set out in the “Environmental Impact Assessment (EIA) Guidance for Consent Authorities regarding Sub-threshold Development”, issued by the Department of the Environment, Heritage, and Local Government (2003),
- i) The criteria set out in Schedule 7 and 7A of the Planning and Development Regulations 2001 as amended, and
- j) The features and measures proposed by applicant envisaged to avoid or prevent what might otherwise be significant effects on the environment,

It is considered that the proposed development would not be likely to have significant effects on the environment and that the preparation and submission of an environmental impact assessment report would not, therefore, be required.

Water Status Impact Assessment Screening

An Coimisiún Pleanála completed a Water Status Impact Assessment screening exercise with regard being had to the objectives of Article 4 of the Water Framework Directive, taking into account the nature of the proposed development, site and receiving environment, the hydrological and hydrogeological characteristics of proximate waterbodies, the absence of any meaningful pathways to any waterbody, the standard pollution controls and project design features, the information and reports submitted as part of the application and appeal, and the Planning Inspector's report.

In completing the screening exercise, the Commission adopted the report of the Planning Inspector, and concluded that proposed development will not result in a risk of deterioration to any waterbody (rivers, lakes, groundwaters, transitional and coastal) either qualitatively or quantitatively or on a temporary or permanent basis or otherwise jeopardise any waterbody in reaching its Water Framework Directive objectives, and that a Water Status Impact Assessment would not, therefore, be required.

Conclusions on Proper Planning and Sustainable Development:

The Coimisiún considers that, subject to compliance with the conditions set out below, the proposed development would be consistent with the applicable Zoning Objective New Residential and other policies and objectives of the Limerick Development 2022 – 2028, would result in an appropriate density of residential development, would constitute a satisfactory mix and quantum of residential development, would provide acceptable levels of residential amenity for future occupants, would not seriously injure the residential or visual amenities of property in the vicinity, would not cause adverse impacts on or result in serious pollution to biodiversity, lands, water, or air, would be acceptable in terms of water and surface water proposals.

Moreover, having regard to the proposed access and egress arrangements, including proposed access via Caislean Nua and to the north of the site at Mount

Green Road, the proposed additional traffic volumes and the location of the site within an existing residential area that the development as proposed would be acceptable in terms of pedestrian, cyclist and traffic safety and convenience, and would not impact negatively on the immediate vicinity of the site. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.

16.0 Conditions

1.	<p>The development shall be carried out and completed in accordance with the plans and particulars lodged with the application, as amended by the further plans and particulars submitted on the 17th day of November 2025, and 11th day of December 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>Reason: in the interest of clarity.</p>
2.	<p>Prior to commencement of development on site measures to ensure the safety of occupants of the subject development from stray golf balls from the adjoining golf course in the form of a consistent boundary wall (to a minimum height of 2.5 metres) and mature planting shall be submitted to and agreed in writing with the planning authority.</p> <p>Reason: In the interest of public health and the proper planning and sustainable development of the area.</p>
3.	<p>The construction access via Mount Green Road is not permitted. Prior to commencement of development, a revised site layout plan shall be submitted for the written agreement of the Planning Authority consisting of details of a redesigned construction access route.</p> <p>Reason: In the interest of traffic safety.</p>
4.	<p>Mitigation and monitoring measures outlined in the plans and particulars, including Ecological Impact Assessment, and Construction and Environmental Management Plan submitted with the application shall be carried out in full, except where otherwise required by conditions attached to this permission.</p> <p>Reason: In the interests of protecting the environment, public health and clarity.</p>

5.	<p>Prior to the commencement of development on site, the applicant shall submit for the written agreement of the Planning Authority the final Phasing Plan indicating:</p> <p>(a) The construction of the dwellings permitted herein shall proceed in accordance with the submitted phasing plan and shall ensure that the appropriate section of access road, footpath, lighting, open space, landscaping and infrastructural services benefitting the particular dwellings are fully completed prior to those dwellings being occupied.</p> <p>(b) The creche permitted herein shall be constructed in Phase 1.</p> <p>Reason: To ensure the timely provision of services, for the benefit of the occupants of the proposed dwellings.</p>
6.	<p>(a) Prior to the commencement of the development as permitted , the applicant or any person with an interest in the land shall enter into an agreement with the planning authority (such agreement must specify the number and location of each house or duplex unit), pursuant to Section 47 of the Planning and Development Act 2000, that restricts all relevant residential units permitted, to first occupation by individual purchasers i.e. those not being a corporate entity, and/or by those eligible for the occupation of social and/or affordable housing, including cost rental housing.</p> <p>(b) An agreement pursuant to Section 47 shall be applicable for the period of duration of the planning permission, except where after not less than two years from the date of completion of each specified housing unit, it is demonstrated to the satisfaction of the planning authority that it has not been possible to transact each of the residential units for use by individual purchasers and/or to those eligible for the occupation of social and/or affordable housing, including cost rental housing.</p> <p>(c) The determination of the planning authority as required in (b) shall be subject to receipt by the planning and housing authority of satisfactory documentary evidence from the applicant or any person with an interest in the land regarding the sales and marketing of the specified housing units, in which case the planning authority shall confirm in writing to the applicant or any person with an interest in the land that the Section 47</p>

	<p>agreement has been terminated and that the requirement of this planning condition has been discharged in respect of each specified housing unit.</p> <p>Reason: To restrict new housing development to use by persons of a particular class or description in order to ensure an adequate choice and supply of housing, including affordable housing, in the common good.</p>
7.	<p>Prior to commencement of development, proposals for a development name and numbering scheme, and associated signage shall be submitted to and agreed in writing with the planning authority. Thereafter, all such names and numbering shall be provided in accordance with the agreed scheme. No advertisements/ marketing signage relating to the name(s) of the development shall be erected until the developer has obtained the planning authority's written agreement to the proposed name(s).</p> <p>Reason: In the interest of urban legibility and to ensure the use for new residential areas.</p>
8.	<p>Details of the materials, colours, and textures of all the external finishes to the proposed development and boundary treatments shall be as submitted with the application, unless otherwise agreed in writing with the planning authority.</p> <p>Reason: in the interest of visual amenity.</p>
9.	<p>Prior to the commencement of development, the developer shall submit further details of landscaping and boundary treatments for the written agreement of the Planning Authority to include the following:</p> <ul style="list-style-type: none"> (a) Details of the green strip on the northern section of the site adjacent to Mount Green Road and all boundaries adjacent to the existing houses in this area. (b) Details of screening along the linear park towards existing houses number 63 – 70. <p>Reason: To protect the residential amenities of the area in the interest of proper planning and sustainable development.</p>
10.	<p>Site development and building works shall be carried out only between the hours of 0700 to 1900 Mondays to Fridays inclusive, 0800 to 1400 hours on Saturdays, and not at all on Sundays and public holidays. Deviation</p>

	<p>from these times will only be allowed in exceptional circumstances where prior written approval has been received from the planning authority.</p> <p>Reason: in order to safeguard the residential amenities of property in the vicinity.</p>
11.	<p>Prior to the commencement of development, the developer shall submit a revised public lighting design for the written agreement of the Planning Authority, fully in accordance with Limerick City and County Council's Public Lighting Specification (2022).</p> <p>Reason: in the interests of amenity and public safety.</p>
12.	<p>Prior to the commencement of development, the developer shall:</p> <ul style="list-style-type: none"> (a) Enter into a Connection Agreement(s) with Uisce Éireann to provide for a service connection(s) to the public water supply and/or wastewater collection network and adhere to the standards and conditions set out in that agreement. (b) Carry out the proposed development in compliance with Uisce Éireann's Standard Details and Codes of Practice. (c) Where the applicant proposes to build over or divert existing water or wastewater services the applicant shall have received written Confirmation of Feasibility (COF) of Diversion(s) from Uisce Éireann prior to any works commencing. (d) Contact Uisce Éireann representatives to agree general access arrangements, prior to the commencement of construction on site. <p>Reason: In the interest of public health and to ensure adequate water/wastewater facilities.</p>
13.	<p>The disposal of surface water shall comply with the requirements of the planning authority for such works and services and in accordance with the plans and particulars lodged.</p> <p>Reason: In the interest of sustainable drainage.</p>
14.	<p>All service cables associated with the proposed development (such as electrical, telecommunications and communal television) shall be located underground. Ducting shall be provided by the developer to facilitate the provision of broadband infrastructure within the proposed development.</p> <p>Reason: In the interests of visual and residential amenity.</p>

15.	<p>Prior to the commencement of development, the developer shall submit:</p> <p>(a). A revised Stage 2 Road Safety Audit for the inclusion of a controlled crossing at the main junction for the written agreement with the Planning Authority in compliance with the TII Publication 'Road Safety Audit GE-STY-01024'.</p> <p>(b). Prior to the occupation of the development a Stage 3 Road Safety Audit shall be submitted for the written agreement of the Planning Authority in compliance with the TII Publication 'Road Safety Audit GE-STY-01024'.</p> <p>(c). The developer shall address all issues raised with the stage 2 and 3 Audits in full and shall submit revised Site Layout Plans to include the recommendations of the Audits for the written agreement of the Planning Authority.</p> <p>Reason: In the interests of traffic, pedestrian and cyclist safety, and sustainable transport.</p>
16.	<p>The applicant shall comply with the requirements of the planning authority with respect to ecology as follows:</p> <p>(a) In the event of high-water table or groundwater strike, a dewatering scheme to keep the excavations free from water will be implemented. A settlement tank will be installed, and water will be discharged into the Irish Water sewer network for the duration of works.</p> <p>(b) Any vegetation removal on site must be done outside bird nesting season March 1st to August 31st inclusive.</p> <p>(c) Swift bricks and hirundine nest boxes should be included in each building over two storeys high. The spec and location of these should be decided by a suitably qualified ecologist</p> <p>(d) Three no. bat boxes should be installed around the site. The spec and location of these should be decided by a suitably qualified ecologist.</p> <p>(e) The following invasive and non-native (alien) species are not to be used:</p> <ul style="list-style-type: none"> • Stipa species or Pheasants tail grass including Anemanthele lessoniana should not be used.

	<ul style="list-style-type: none"> • Centaurea montana Portuguese Laurel Prunus lusitanica is proposed as a hedging plant. • A native species such as holly Ilex aquifolium or Yew Taxus baccata should be used as it is of higher ecological value. <p>Reason: In the interest of protection of the environment, nature conservation and in the interest of public health.</p>
17.	<p>A minimum of 20% of all car parking spaces shall be provided with functioning electric vehicle charging stations/ points, and ducting shall be provided for all remaining car parking spaces, facilitating the installation of electric vehicle charging points/ stations at a later date. Where proposals relating to the installation of electric vehicle ducting and charging stations/ points have not been submitted with the application, in accordance with the above noted requirements, such proposals shall be submitted to and agreed in writing with the planning authority prior to the occupation of the development.</p> <p>Reason: To provide for and/ or future proof the development such as would facilitate the use of electric vehicles.</p>
18.	<p>A Construction and Environmental Management Plan (CEMP) shall be submitted to and agreed in writing with the planning authority prior to the commencement of development. The CEMP shall include but not be limited to construction phase controls for dust, noise and vibration, waste management, protection of soils, groundwaters, and surface waters, site housekeeping, emergency response planning, site environmental policy, and project roles and responsibilities.</p> <p>Reason: in the interest of environmental protection residential amenities, public health and safety and environmental protection.</p>
19.	<p>A detailed construction traffic management plan shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. The plan shall include details of arrangements for routes for construction traffic, parking during the construction phase, the location of the compound for storage of plant and machinery and the location for storage of deliveries to the site.</p>

	Reason: In the interest of sustainable transport and safety.
20.	<p>(a) An Operational Waste Management Plan (OWMP) containing details for the management of waste within the development, the provision of facilities for the storage, separation, and collection of the waste and for the ongoing operation of these facilities, shall be submitted to and agreed in writing with the planning authority not later than six months from the date of commencement of the development. Thereafter, the waste shall be managed in accordance with the agreed OWMP.</p> <p>(b) The OWMP shall provide for screened bin stores for the apartment blocks, and the childcare facility, the locations, and designs of which shall be as indicated in the plans and particulars lodged within the application unless otherwise agreed in writing with the planning authority.</p> <p>Reason: In the interest of residential amenity, and to ensure the provision of adequate refuse storage for the proposed development.</p>
21.	<p>Prior to the commencement of development, a Resource Waste Management Plan (RWMP) as set out in the EPA's 'Best Practice Guidelines for the Preparation of Resource and Waste Management Plans for Construction and Demolition Projects' (2021) shall be prepared and submitted to the planning authority for written agreement. The RWMP shall include specific proposals as to how the RWMP will be measured and monitored for effectiveness. All records (including for waste and all resources) pursuant to the agreed RWMP shall be made available for inspection at the site office at all times.</p> <p>Reason: In the interest of proper planning and sustainable development.</p>
22.	<p>The management and maintenance of the proposed development following its completion shall be the responsibility of a legally constituted management company, or by the local authority in the event of the development being taken in charge. Detailed proposals in this regard shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.</p> <p>Reason: To ensure the satisfactory completion and maintenance of this development.</p>

23.	<p>Prior to the commencement of development on site that applicant shall submit the following for the written agreement of the Planning Authority:</p> <ul style="list-style-type: none"> (a) Notify the Planning Authority in writing at least four weeks prior to the commencement of any site operation (including hydrological and geotechnical investigations) relating to the proposed development. (b) Employ a suitably qualified archaeologist who shall apply for a licence to monitor all site investigations, excavation works and all ground disturbance associated with the development. (c) Submit the name of the suitably qualified archaeologist to the Planning Authority four weeks in advance of the commencement of any site works (including site investigations) accompanied by a site specific letter from the archaeologist certifying that they have applied for a licence. <p>Reason: In order to conserve the archaeological heritage of the site and to secure the preservation of any remains which may exist within the site.</p>
24.	<p>Prior to the commencement of development on site that applicant shall submit the following for the written agreement of the Planning Authority:</p> <ul style="list-style-type: none"> (a) Submit on completion of the ground works a report detailing the results of the licensed archaeological monitoring works to the Department of Housing, Local Government & Heritage and the Planning Authority. The report shall contain a drawing showing the exact extent of the area that was archaeologically monitored certified by the archaeologist. Excavators should include a catalogue of excavated features with 12 figure ITM coordinates for the centre point of each feature. In the event that the development is phased, interim reports shall be submitted at each stage showing the area monitored and giving preliminary results. (b) Should archaeological material be found during the course of monitoring, the archaeologist may have work on the site stopped, pending a decision as to how best to deal with the archaeology. The Development Applications Unit, National Monuments Service, Department of Housing, Local Government & Heritage and the

	<p>Planning Authority Archaeologist shall be informed immediately. The developer shall be prepared to be advised by the National Monuments Service, Department of Housing, Local Government & Heritage and the Planning Authority with regard to any necessary mitigating action.</p> <p>(c) Should an archaeological excavation be required then the following shall apply: the developer shall provide satisfactory arrangements for the recording and excavation of any archaeological material that may be considered appropriate to excavate and shall undertake to complete all post excavation analysis up to and including final report stage. Excavators should include a catalogue of excavated features with 12 figure ITM coordinates for the centre point of each feature. Within twelve months of the completion of the excavation a final report (in the format recommended in the Guidelines for Authors of Reports on Archaeological Excavations 2006 National Monuments Service) shall be submitted to the Planning Authority.</p> <p>Reason: In order to conserve the archaeological heritage of the site and to secure the preservation of any remains which may exist within the site.</p>
25.	<p>Prior to commencement of development, the applicant or other person with an interest in the land to which the application relates shall enter into an agreement in writing with the planning authority in relation to the provision of housing in accordance with the requirements of section 94(4) and sections 96(2) and (3) (Part V) of the Planning and Development Act 2000, as amended, unless an exemption certificate shall have been applied for and been granted under section 97 of the Act, as amended. Where such an agreement is not reached within eight weeks from the date of this order, the matter in dispute (other than a matter to which section 96(7) applies) may be referred by the planning authority or any other prospective party to the agreement to An Coimisiún Pleanála for determination</p>

	<p>Reason: To comply with the requirements of Part V of the Planning and Development Act 2000, as amended, and of the housing strategy in the development plan of the area.</p>
26.	<p>Prior to commencement of development, the developer shall lodge with the planning authority a cash deposit, a bond of an insurance company, or other security to secure the provision and satisfactory completion and maintenance until taken in charge by the local authority and/ or management company of roads, footpaths, watermains, drains, public open space and other services required in connection with the development, coupled with an agreement empowering the local authority to apply such security or part thereof to the satisfactory completion or maintenance of any part of the development. The form and amount of the security shall be as agreed between the planning authority and the developer or, in default of agreement, shall be referred to An Coimisiún Pleanála for determination.</p> <p>Reason: To ensure the satisfactory completion and maintenance of the development until taken in charge.</p>
27.	<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>Reason: It is a requirement of the Planning and Development Act 2000, as amended, that a condition requiring a contribution in accordance with the</p>

	Development Contribution Scheme made under section 48 of the Act be applied to the permission.
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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.

Emma Nevin

Planning Inspector

2nd April 2026

Appendix A – Screening for Appropriate Assessment

Screening for Appropriate Assessment Test for likely significant effects	
Step 1: Description of the project and local site characteristics	
Brief description of project	Construction of 114 dwellings, ESB substation and associated site works at Golf Links Road and Mount Green Road, Newcastle, Castletroy, Co. Limerick
Brief description of development site characteristics and potential impact mechanisms	<p>[include size, scale, land take, proximity to European site, duration of works, measures integral to design – any key issues, e.g. emissions, disturbance,]</p> <p>The site is a 3.6-hectare greenfield site which is part of an overall housing development site that has been developed on a phased basis, and the subject site represents the last remaining part of the overall site to be developed.</p> <p>The development site is not located within or directly adjacent to any Natura 2000 site. It is physically removed from the Lower River Shannon SAC and works are approximately 1.7km from the boundary of this area at their closest points (the Mulkear Shannon).</p> <p>There are no water courses, drainage ditches, bodies of open water or habitats which could be described as wetlands.</p>
Screening report	Yes
Natura Impact Statement	No
Relevant submissions	No
Step 2. Identification of relevant European sites using the Source-pathway-receptor model	
Sites within zone of influence of project.	

European Site (code)	Qualifying interests ¹ Link to conservation objectives (NPWS, date)	Distance from proposed development (km)	Ecological connections ²	Consider further in screening ³ Y/N
002165 – Lower River Shannon SAC	Lower River Shannon SAC National Parks & Wildlife Service	1.7km to the north	No hydrological connectivity and sufficient geographical separation, so no potential for impacts	No
004077 - River Shannon and River Fergus Estuaries SPA	River Shannon and River Fergus Estuaries SPA National Parks & Wildlife Service	4.5km to the east	No hydrological connectivity and sufficient geographical separation, so no potential for impacts	No

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

[From the AA Screening Report or the Inspector's own assessment if no Screening Report submitted, complete the following table where European sites need further consideration taking the following into account:

- (a) Identify potential direct or indirect impacts (if any) arising from the project alone that could have an effect on the European Site(s) taking into account the size and scale of the proposed development and all relevant stages of the project (See Appendix 9 in Advice note 1A).
- (b) Are there any design or standard practice measures proposed that would reduce the risk of impacts to surface water, wastewater etc. that would be implemented regardless of proximity to a European Site?
- (c) Identify possible significant effects on the European sites in view of the conservation objectives (alone or in combination with other plans and projects)

AA Screening matrix

Site name Qualifying interests	Possibility of significant effects (alone) in view of the conservation objectives of the site*	
	Impacts	Effects
Site 1: Lower River Shannon SAC (Site code: 2165)	Direct: None Indirect:	The subject lands are not located within or directly adjacent to any Natura 2000 area. There can be no loss of habitat inside any SAC or SPA arising from this project due to the separation distance. Only indirect impacts are therefore possible.

<p>Qualifying Interest:</p> <ul style="list-style-type: none"> • Sandbanks which are slightly covered by sea water all the time [1110] • Estuaries [1130] • Mudflats and sandflats not covered by seawater at low tide [1140] • Coastal lagoons [1150] • Large shallow inlets and bays [1160] • Reefs [1170] • Perennial vegetation of stony banks [1220] • Vegetated sea cliffs of the Atlantic and Baltic coasts [1230] • Salicornia and other annuals colonising mud and sand [1310] • Atlantic salt meadows (<i>Glaucopuccinellietalia maritimae</i>) [1330] • Mediterranean salt meadows (<i>Juncetalia maritimi</i>) [1410] • Water courses of plain to montane levels with the <i>Ranunculion fluitantis</i> and <i>Callitriche-Batrachion</i> vegetation [3260] • <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>) [6410] • 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] • <i>Margaritifera margaritifera</i> (Freshwater Pearl Mussel) [1029] • <i>Petromyzon marinus</i> (Sea Lamprey) [1095] 	<ul style="list-style-type: none"> • Negative impacts (temporary) on surface water and water quality due to construction related emissions including increased sedimentation and construction related pollution. • Impacts on water quality from Wastewater discharge. 	<p>Water Quality:</p> <p>There is a pathway from the development site via surface and wastewater water flows to the River Groody and the Shannon Estuary respectively.</p> <p>The proposed new homes will increase the quantity of wastewater to be generated however there is sufficient capacity in the Bunlickey wastewater treatment plant.</p> <p>Attenuation measures have been incorporated into the design of the surface water drainage system, there can be no impact to the quality or quantity of surface water run-off. The homes are to be designed with Sustainable Drainage Systems (SUDS) and so no changes to the quantity or quality or run off is predicted.</p> <p>Surface water will be separate from the foul sewer and so relieve pressure on the Bunlicky plant.</p> <p><u>Habitat Loss:</u></p> <p>The construction zone of the development site is too far from any Natura 2000 site to result in any loss of habitat. No significant effects to Natura 2000 sites are likely to arise from habitat loss</p> <p><u>Habitat Disturbance:</u></p> <p>Due to the separation distance between the development site and Natura 2000 sites, there can be no disturbance effects during either the construction or operational phases (e.g. through noise, human activity or artificial lighting).</p> <p>No significant effects to Natura 2000 sites are likely to arise from habitat disturbance.</p>
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<ul style="list-style-type: none"> • Lampetra planeri (Brook Lamprey) [1096] • Lampetra fluviatilis (River Lamprey) [1099] • Salmo salar (Salmon) [1106] • Tursiops truncatus (Common Bottlenose Dolphin) [1349] • Lutra lutra (Otter) [1355] 		
	Likelihood of significant effects from proposed development (alone): No.	
	If No, is there likelihood of significant effects occurring in combination with other plans or projects? There are no projects that can act in combination with this proposal, and which may result in significant effects to Natura 2000 areas.	
	Possibility of significant effects (alone) in view of the conservation objectives of the site*: No.	
	Impacts	Effects
Site 2: River Shannon and River Fergus Estuaries SPA (site code: 4077) Qualifying Interest: <ul style="list-style-type: none"> • Cormorant (Phalacrocorax carbo) [A017] • Whooper Swan (Cygnus cygnus) [A038] • Light-bellied Brent Goose (Branta bernicla hrota) [A046] • Shelduck (Tadorna tadorna) [A048] • Teal (Anas crecca) [A052] • Pintail (Anas acuta) [A054] 	Direct: None Indirect: <ul style="list-style-type: none"> • Negative impacts (temporary) on surface water and water quality due to construction related emissions including increased sedimentation and construction related pollution. • Impacts on water quality from Wastewater discharge. 	The subject lands are not located within or directly adjacent to any Natura 2000 area. There can be no loss of habitat inside any SAC or SPA arising from this project due to the separation distance. Only indirect impacts are therefore possible. Water Quality: There is a pathway from the development site via surface and wastewater water flows to the River Groody and the Shannon Estuary respectively. There are no water quality conservation objectives for species or habitats in the marine or intertidal zone, including for bird populations in the SPA.

<ul style="list-style-type: none"> • Scaup (Aythya marila) [A062] • Ringed Plover (Charadrius hiaticula) [A137] • Golden Plover (Pluvialis apricaria) [A140] • Grey Plover (Pluvialis squatarola) [A141] • Lapwing (Vanellus vanellus) [A142] • Knot (Calidris canutus) [A143] • Dunlin (Calidris alpina) [A149] • Black-tailed Godwit (Limosa limosa) [A156] • Bar-tailed Godwit (Limosa lapponica) [A157] • Curlew (Numenius arquata) [A160] • Redshank (Tringa totanus) [A162] • Greenshank (Tringa nebularia) [A164] • Black-headed Gull (Chroicocephalus ridibundus) [A179] • Wigeon (Mareca penelope) [A855] • Shoveler (Spatula clypeata) [A857] • Wetland and Waterbirds [A999] 		<p>The proposed new homes will increase the quantity of wastewater to be generated however there is sufficient capacity in the Bunlickey wastewater treatment plant.</p> <p>Attenuation measures have been incorporated into the design of the surface water drainage system, there can be no impact to the quality or quantity of surface water run-off. The homes are to be designed with Sustainable Drainage Systems (SUDS) and so no changes to the quantity or quality or run off is predicted.</p> <p>Surface water will be separate from the foul sewer and so relieve pressure on the Bunlicky plant.</p> <p><u>Habitat Loss:</u></p> <p>The construction zone of the development site is too far from any Natura 2000 site to result in any loss of habitat. No significant effects to Natura 2000 sites are likely to arise from habitat loss</p> <p><u>Habitat Disturbance:</u></p> <p>Due to the separation distance between the development site and Natura 2000 sites, there can be no disturbance effects during either the construction or operational phases (e.g. through noise, human activity or artificial lighting).</p> <p>No significant effects to Natura 2000 sites are likely to arise from habitat disturbance.</p>
	<p>Likelihood of significant effects from proposed development (alone): No.</p>	
	<p>If No, is there likelihood of significant effects occurring in combination with other plans or projects? There are no projects that can act in combination with this proposal, and which may result in significant effects to Natura 2000 areas.</p>	
	<p>Possibility of significant effects (alone) in view of the conservation objectives of the site*: No.</p>	

Step 4 Conclude if the proposed development could result in likely significant effects on a European site

I conclude that the proposed development (alone) would not result in likely significant effects on the Lower River Shannon SAC (Site code: 2165) and the River Shannon and River Fergus Estuaries SPA (Site code: 4077). The proposed development would have no likely significant effect in combination with other plans and projects on any European sites.

No further assessment is required for the project.

No mitigation measures are required to come to these conclusions.

Appendix B Form 1- EIA Pre-Screening

An Bord Pleanála	ACP-323968-25		
Case Reference			
Proposed Development Summary	The construction of 114 dwellings, creche, ESB substation childcare facility and all ancillary associated site works.		
Development Address	Golf Links Road and Mount Green Road, Newcastle, Castletroy, Co. Limerick		
1. Does the proposed development come within the definition of a 'project' for the purposes of EIA?		Yes	X
(that is involving construction works, demolition, or interventions in the natural surroundings)		No	
2. Is the proposed development of a CLASS specified in Part 1 or Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended)?			
Yes	X	10(b)(i) Construction of more than 500 dwelling units.	Proceed to Q3.
No			
3. Does the proposed development equal or exceed any relevant THRESHOLD set out in the relevant Class?			
Yes			
No	X	The proposed development does not equal or exceed the 500 unit threshold.	Proceed to Q4

4. Is the proposed development below the relevant threshold for the Class of development [sub-threshold development]?			
Yes	X	Class 10(b)(i) construction of more than 500 dwelling units. The development is for 114 units.	Preliminary examination required (Form 2)

5. Has Schedule 7A information been submitted?		
No		
Yes	X	Ecological Impact Assessment Preliminary Examination Submitted EIAR required – Form 3

Inspector: _____

Date: 2nd April 2026

Appendix C – Form 3 – EIA Screening Determination

A. CASE DETAILS			
An Coimisiún Pleanála Case Reference	ACP-323968-25		
Development Summary	The construction of 114 dwellings, creche, ESB substation childcare facility and all ancillary associated site works.		
	Yes / No / N/A	Comment (if relevant)	
1. Was a Screening Determination carried out by the PA?	Yes		
2. Has Schedule 7A information been submitted?	Yes	A Screening Report for EIAR has been submitted. This has also been noted in the planner's assessment.	
3. Has an AA screening report or NIS been submitted?	Yes	Stage 1 (AA) has been 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		
B. EXAMINATION	Yes/ No/ Uncertain	Briefly describe the nature and extent and Mitigation Measures (where relevant) (having regard to the probability, magnitude (including population size affected), complexity, duration, frequency, intensity, and reversibility of impact) Mitigation measures –Where relevant specify features or measures proposed by	Is this likely to result in significant effects on the environment? Yes/ No/ Uncertain

		the applicant to avoid or prevent a significant effect.	
This screening examination should be read with, and in light of, the rest of the Inspector's Report attached herewith			
1. Characteristics of proposed development (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 proposal comprises a residential scheme with creche and is located in a primarily residential area and comprises the extension and completion of Caislean Nua, a new residential neighbourhood on the Golf Links Road in the eastern suburbs of Limerick city.	No
1.2 Will construction, operation, decommissioning or demolition works cause physical changes to the locality (topography, land use, waterbodies)?	Yes	The proposed residential development will result in site excavations and the construction of a new development within the existing greenfield site, which is subject to the zoning objective 'New Residential', <i>"to provide for new residential in tandem with the provision of social and physical infrastructure"</i> , as per the Limerick Development Plan 2022 – 2028, that applies to these lands.	No
1.3 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	Construction materials will be typical for the type of development proposed. The loss of natural resources as a result of the development of the site are not regarded as significant in nature.	No
1.4 Will the project involve the use, storage, transport, handling or production of substance which would be harmful to human health or the environment?	No	Some potentially contaminating construction materials. Such construction impacts would be local and temporary in nature and with the implementation of standard measures outlined in Construction Environmental Management Plan would satisfactorily mitigate the potential impacts.	No

<p>1.5 Will the project produce solid waste, release pollutants or any hazardous / toxic / noxious substances?</p>	<p>Yes</p>	<p>Construction activities will require the use of potentially harmful materials, such as fuels and other similar substances, and will give rise to waste for disposal. The use of these materials would be typical for construction sites. Noise and dust emissions during construction are likely. Such construction impacts would be local. and temporary in nature and with the implementation of standard measures outlined in Construction Environmental Management Plan would satisfactorily mitigate the potential impacts. Operational waste would be managed. Other significant operational impacts are not anticipated.</p>	<p>No</p>
<p>1.6 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?</p>	<p>No</p>	<p>No significant risks are identified.</p>	<p>No</p>
<p>1.7 Will the project cause noise and vibration or release of light, heat, energy or electromagnetic radiation?</p>	<p>Yes</p>	<p>There is potential for the construction activity to give rise to noise and vibration emissions. Such emissions will be localised, short term in nature and their impacts would be suitably mitigated by the operation of standard measures listed in a Construction Environmental Management Plan.</p>	<p>No</p>
<p>1.8 Will there be any risks to human health, for example due to water contamination or air pollution?</p>	<p>Yes</p>	<p>Construction activity is likely to give rise to dust emissions. Such construction impacts would be temporary and localised in nature and the application of standard measures within a Construction Environmental Management Plan would satisfactorily address potential risks on human health.</p>	<p>No</p>

1.9 Will there be any risk of major accidents that could affect human health or the environment?	No	No risk from the proposed development and the site is not located in vicinity of any major accident sites.	No
1.10 Will the project affect the social environment (population, employment)	Yes	The population in the area will increase and employment would be provided in the creche element of the proposed development. It is anticipated that the development will positively affect the social environment.	No
1.11 Is the project part of a wider large scale change that could result in cumulative effects on the environment?	No	No significant risks are identified.	No
2. Location of proposed development			
2.1 Is the proposed development located on, in, adjoining or have the potential to impact on any of the following: <ul style="list-style-type: none"> • 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 	No	<p>No National or European sites located on or adjacent to the site. The closest Natura 2000 sites are the Lower River Shannon SAC which is 1.7km from the site, and the River Shannon and River Fergus Estuaries SPA lies approximately 4.5km to the east of the site.</p> <p>Screening for Appropriate Assessment was provided in support of the application.</p> <p>Having regard to the nature, scale and location of the proposed works and possible impacts arising from construction works, the qualifying interests and conservation objectives of the European sites and the potential for in-combination effects, the possibility of any significant impacts on any of the identified European sites as a result of the proposed development, either in itself or in</p>	No

		combination with other plans or projects, can be excluded.	
2.2 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	No European sites located on or adjacent to the site.	No
2.3 Are there any other features of landscape, historic, archaeological, or cultural importance that could be affected?	Yes	There is no indication whether an archaeological impact assessment was carried out. The area of the current application has been disturbed during previous phases of construction. It is possible, however, that archaeological material still survives within the site. A detailed and fieldwork-based Archaeological Impact Assessment Report should be carried out. The report shall also include an archaeological impact statement and recommended mitigation strategy. A prior to the commencement of development condition can be included to ensure sustainable development and the protection of the archaeological heritage.	No
2.4 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 significant risks are identified.	No
2.5 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 development will implement SUDS measures to control surface water run-off and reduce surface run off from that of the existing condition on site.	No

		<p>The site located on Flood Zone C lands; therefore, a flood risk assessment is not required.</p> <p>Potential impacts arising from the discharge of surface waters to receiving waters are not likely or anticipated. I reference the WFD Impact Assessment Stage 1 Screening report in this regard.</p>	
2.6 Is the location susceptible to subsidence, landslides or erosion?	No	No significant risks are identified.	No
2.7 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	<p>The site is essentially proposed to be split into three with access from the northern part to be provided via Mount Green Road, access from the southern part of the site being provided via the existing Caislean Nua housing estate to the west onto Golf Links road.</p> <p>Adequate car parking is proposed to serve the development. I also note that the site is within walking distance to Limerick City.</p> <p>A stage 1 Road Safety Audit and Traffic and Transportation Assessment have been submitted.</p> <p>The developer was requested to use an alternative construction access to that originally proposed i.e. via Caislean Nua, this is acceptable. No significant contribution to traffic congestion is anticipated from the subject development.</p>	No

		Several conditions are recommended by the Planning Authority, which are reasonable. Notwithstanding, construction traffic may impact on the area, however this will be short term and will be managed via a Construction Environmental Management Plan.	
2.8 Are there existing sensitive land uses or community facilities (such as hospitals, schools etc) which could be affected by the project?	No	No impact is anticipated in respect to air pollution on the nearest adjoining sensitive land uses.	No
3. Any other factors that should be considered which could lead to environmental impacts			
3.1 Cumulative Effects: Could this project together with existing and/or approved development result in cumulative effects during the construction/ operation phase?	No	No existing or permitted developments have been identified in the immediate vicinity that would give rise to significant cumulative environmental effects with the subject project. Any cumulative traffic impacts that may arise during construction would be subject to a project construction traffic management plan.	No
3.2 Transboundary Effects: Is the project likely to lead to transboundary effects?	No	No transboundary considerations arise.	No
3.3 Are there any other relevant considerations?	No	No	No
C. CONCLUSION			
No real likelihood of significant effects on the environment.	<input checked="" type="checkbox"/>	EIAR Not Required	
Real likelihood of significant effects on the environment.	<input type="checkbox"/>	EIAR Required	
D. MAIN REASONS AND CONSIDERATIONS			
<i>EG - EIAR <u>not</u> Required</i>			
Having regard to: -			

1. The criteria set out in Schedule 7, in particular
 - (a) the nature and scale of the proposed development, within the existing site context
 - (b) the absence of any significant environmental sensitivity in the vicinity, and the location of the proposed development outside of the designated archaeological protection zone
 - (c) 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. Screening Report for Appropriate Assessment and an Environmental Impact Assessment Preliminary Examination were provided in support of the application.
3. The features and measures proposed by 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 2nd April 2026

Approved (ADP) _____

Date 2nd April 2026

Appendix D: WFD IMPACT ASSESSMENT STAGE 1: SCREENING

Step 1: Nature of the Project, the Site and Locality

An Coimisiún Pleanála ref. no.	ACP-323968-25	Townland, address	Golf Links Road and Mount Green Road, Newcastle, Castletroy, Co. Limerick
Description of project		The construction of 114 dwellings, creche, ESB substation childcare facility and all ancillary associated site works.	
Brief site description, relevant to WFD Screening,		<p>Site is cleared of all structures and is greenfield in nature and is part of an overall housing development site, which fronts onto the eastern side of Golf Links Road. The residential zoned site has been developed on a phased basis over the years. The subject site represents the last remaining part of the overall site to be developed, situated to the rear of recently constructed residential units, bound by the Waterworks and undeveloped zoned land to the east, Castletroy Golf Club to the south, the recently constructed Caislean Nua to the west and Mount Green Road to the north.</p> <p>There are no water courses, drainage ditches, bodies of open water or habitats which could be described as wetlands on site.</p> <p>The closest watercourse is the River Groody (a tributary of the River Shannon), which is approx. 1 km west of the site (at the closest point). Due to its distance from the site and the</p>	

	<p>presence of intervening buildings and roads, it can be concluded that the site has no connection to River Groody.</p>
<p>Proposed surface water details</p>	<p>The surface water system originally granted planning permission has largely been installed in accordance with information submitted under permission 04-670 on 31st March 2005. The permitted surface water system was to serve the entire development lands of circa 9 hectares including Phase 1. 2 & 3 already constructed. Connection shall be made to the existing system. Prior to discharge of surface water, the system shall be restricted and designed to clean, retain and infiltrate through a combination of permeable paving and bioretention features.</p> <p>A SUDS Maintenance Plan Management Statement and Civil Engineering Services Report both prepared by 'Hutch O'Malley Consulting Engineers' have been provided.</p> <p>The proposal provides for permeable paving to driveways and hard standing areas around buildings but all footpaths, roads and car parking and cycleways in the public realm will be an impermeable construction.</p>
<p>Proposed water supply source & available capacity</p>	<p>Confirmation of Feasibility (COF) has been issued to the applicant advising that (water/ wastewater) connections are feasible subject to upgrades. An advice note has been attached to the grant of permission in respect to Confirmation of Feasibility and connection agreements with Uisce Eireann.</p> <p>Uisce Eireann mains water connection.</p> <p>Public Water Supply i.e. Limerick city and Suburbs, which has a green status – 'Capacity Available' rating.</p>

Proposed wastewater treatment system & available capacity, other issues	<p>Confirmation of Feasibility (COF) has been issued to the applicant advising that (water/ wastewater) connections are feasible subject to upgrades. An advice note has been attached to the grant of permission in respect to Confirmation of Feasibility and connection agreements with Uisce Eireann.</p> <p>Uisce Eireann Wastewater connection.</p> <p>Public foul drainage system 'Castletroy WWTP', which has a Green rating – 'Spare Capacity Available'.</p>
Others?	<p>N/A</p>

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)
Transitional waterbody	500m – 1km – to the west of the site.	GROODY_010 (IE_SH_25G0502 00)	Moderate	At Risk	Urban waste water	Surface water run off and wastewater

Groundwater body	Underlying site	Limerick City East (Site Code: IE_SH_G_138)	Good	At Risk	Surface water drainage in storm events	Drainage to groundwater	
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.	Site clearance & Construction	GROODY_010 (IE_SH_25G050200)	None	Water Pollution - Deterioration of surface water quality from pollution of	Use of Standard Construction Practice and CEMP	No	Screen out at this stage.

				surface water run-off during site construction			
2.	Site clearance & Construction	Limerick City East (Site Code: IE_SH_G_13 8)	Drainage through soil / bedrock	Reduction in groundwater quality from pollution of surface water run-off	Use of Standard Construction Practice and CEMP	No	Screen out at this stage.
OPERATIONAL PHASE							
1.	Surface Water Run-off	GROODY_0 10 (IE_SH_25G0 50200)	None	None	Several SuDS features incorporated into proposal	No	Screen out at this stage.
2.	Surface Water Run-off	Limerick City East (Site Code: IE_SH_G_13 8)	Drainage through soil/ bedrock	Reduction in groundwater quality	SUDS and greenfield discharge rates	No	Screened out at this stage
DECOMMISSIONING PHASE							

1.	N/A	N/A	N/A	N/A	N/A	N/A	N/A
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