



An
Coimisiún
Pleanála

Inspector's Report

ACP-324206-26

Development

Construction of 95 apartments, 22 houses and a Purpose-Built Student Accommodation (PBSA) scheme comprising 309 student bedspaces. The development also includes provision of a creche and all associated site works - <https://groodylrd.com/>

Location

Groody Road and Caisleán Na hAbhann, Kilbane Castletroy, Co. Limerick

Planning Authority

Limerick City and County Council

Planning Authority Reg. Ref.

2660089

Applicant(s)

A&G Thomond Builders Limited

Type of Application

Large-Scale Residential Development

Planning Authority Decision

Grant Permission

Type of Appeal

Third Party

Appellant(s)

Caisleán Na hAbhann Residents Association
Diarmuid Ryan

Observer(s)	John Mulvihill Michael Hennessey and Denis Tierney Christopher McNamara
Further Observer(s)	None
Date of Site Inspection	23 rd June 2026
Inspector	Emma Nevin

Contents

1.0 Introduction	4
2.0 Site Location and Description	4
3.0 Proposed Development	5
4.0 Planning Authority Pre-Application Opinion	8
5.0 Planning Authority Decision	10
6.0 Planning History.....	20
7.0 Policy Context.....	21
8.0 The Appeal	33
8.1. Grounds of Appeal	33
8.3. Further Observations	36
8.4. Planning Authority Response.....	36
8.5. Applicant's Response	36
9.0 Assessment	38
10.0 Water Framework Directive	81
11.0 Appropriate Assessment	82
12.0 Environmental Impact Screening.....	82
13.0 Conclusion.....	86
14.0 Recommendation	87
15.0 Recommended Commission Order	87
16.0 Conditions	93

Appendix A – Screening for Appropriate Assessment

Appendix B – Form 1 – EIA – Pre-Screening

Appendix C – Form 3 – EIA Screening Determination

Appendix D – WFD Impact Assessment Stage 1: Screening

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 two (2 no.) third parties to An Coimisiún Pleanála.
- 1.2. I also note that three (3 no.) observations were made on the appeal. These are all referenced within the report.

2.0 Site Location and Description

- 2.1. The site is a 3.23 hectare greenfield site to the east of Limerick City centre, located in a mixed urban area, located between the Groody Road to the west and Caisleán Na hAbhann to the east. To the north, there is existing student accommodation (Brookfield Hall).
- 2.2. The site is approximately 3.7km east of Limerick City centre, the site is situated within 1.5km of the University of Limerick. The general area comprises a mix of commercial and residential uses, with residential use dominant to the east and student housing adjoining the site to the north. The Groody Road extending north of the site primarily comprises residential uses, including a number of residential blocks accommodating students. Residential use is also dominant to the east.
- 2.3. There is a significant fall across the site from east to west, with a more gradual fall from north to south. The level of the site adjacent to the existing Groody Road varies from 8.06mOD to 10.25m OD while the levels vary from 12.0m to 14.0m along eastern boundary.
- 2.4. The site is presently overgrown with mature planting to all boundaries and is enclosed with timber fencing. There is an existing bus stop adjoining the site on the Groody Road, to the west.

3.0 Proposed Development

3.1. The proposed development comprises of the following:

Nature of Development

- 95 no. apartments, 22 no. houses and a purpose-built student accommodation scheme (PBSA) comprising 309 no. student bedspaces.

The apartment units are distributed across 4 no. separate blocks of 4.5 storeys in height and comprise (a) 18 no. 1 bed units; (b) 74 no. 2 bed units; and (c) 3 no. 3 bed units. The houses comprise 2 storey units including (a) 8 no. 4 bed units and (b) 14 no. 3 bed units and the provision of a creche.

Three no. apartment blocks are located centrally within the site, with the proposed creche which will be accessed from the Groody Road to the west.

The proposed houses are located to the central and southern portion of the site, with a proposed apartment block to the southern section of the site. This portion of the development will be accessed via Caisleán Na hAbhann.

- The PBSA scheme is distributed across 4 no. separate blocks of 5 storeys in height including provision of (a) 3 no. 7 bed apartments; (b) 36 no. 8 bed apartments; and (c) ancillary building service infrastructure at ground floor level in Block 1 including communal space, laundry facilities and a meeting room.

The proposed PBSA is located to the northern portion of the site, to adjoin the existing student block at Brookfield Hall. The proposed PDSA blocks are in pavilion form surrounding a central open space.

- Planning permission is also sought for use of the accommodation, outside of student term time, for short-term letting purposes.

Ancillary Infrastructure

- 159 no. Car parking spaces and 659 no. bicycle parking;
- Bicycle stands;
- 2 no. bicycle sheds;

- Boundary treatments;
- Public lighting;
- Water supply;
- Foul and surface water drainage infrastructure;
- ESB substation;
- Temporary construction access;
- Landscaping.
- Vehicular and pedestrian access to the site will be from the Groody Road and Caisleán Na hAbhann.

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

- LRD Application Form;
- Consent Letter from Limerick City & County Council;
- Part V Agreement;
- A full suite of architectural drawings prepared by Arnold Leahy Architects;
- Architectural Design Statement;
- Housing Quality Assessment;
- Building Lifecycle Report;
- Student Schedule of Accommodation;
- CGI's;
- Daylight & Sunlight Assessment;
- Landscape Drawings;
- Landscape Design Report;
- Engineering Drawings prepared by DRA Consulting Engineers;
- Civil Engineering Design Report;
- Appropriate Assessment Screening Report;

- Ecological Impact Assessment;
- Bat Survey;
- Tree Survey & Arboriculture Impact Assessment;
- Archaeological Impact Assessment & Test Trenching Report;
- Environmental Noise Report;
- Water Framework Directive Assessment Report;
- Construction Environmental Management Plan;
- Public Lighting Drawings & Report;
- Traffic & Transport Impact Assessment;
- Mobility Management Plan;
- Road Safety Audit;
- Planning Compliance Statement;
- Response to LRD Opinion;
- EIA Screening Report;
- Student Demand Assessment;
- Operational Student Management Plan; and
- Social Infrastructure Audit.

3.2.1. Key Development Areas as presented in the application:

Table 2.0: Development Areas	
Gross Site Area	3.23 hectares
Net Developable Area	3.0 hectares
Development Gross Floor Area	21,843.8sqm
Residential Use – Apartments & Houses	12,692.8sqm
Residential Use – Student Housing	8,630sqm
Creche Area & Children Numbers	438sqm catering for 48 no. children
Bike Stores	78sqm
ESB Sub Station	5sqm
Building Height	2 – 5 storeys
Public Open Space	0.48 hectares (15%)
Communal Open Space	3,200sqm (0.32 hectares)
Density	64.7 units per hectare
Plot Ratio	0.406
Site Coverage	20.1%
Part V Provision	12 no. units

In addition the proposal provides 159 no. Car parking spaces and 659 no. bicycle parking (as noted above).

4.0 Planning Authority Pre-Application Opinion

4.1. Pre-application consultation meeting

- 4.1.1. I refer to pre-application Ref. 1037911 in relation to a proposed development of apartments, residential units, Purpose Built Student Accommodation (PBSA) and a creche on a site situated between the Groody Road and Caisleán Na hAbhann in the townland of Kilbane, Castletroy, Limerick.

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:

- To provide details of engagement and agreement with the LCCC Housing Section to deliver social/affordable housing in line with the requirements of Part V.
- To provide details of how the elevations of these blocks could be broken more and better assimilated into the site and surrounding area.
- Public / Communal Open Space - Details of how this has been calculated should be provided.
- Parking - To clarify how the various parking spaces would be managed across the site given the different residential uses proposed. Particularly in the context of the spaces adjacent to the houses and apartments in the southern half of the development, and to clarify where the visitor bicycle parking would be located for the houses and show locations on a revised site layout.
- Provide a revised TIC layout omitting the apartments and student accommodation and clarify how the roads, footpaths and open spaces afforded to each type of development would be managed across the site given that there are overlaps of this infrastructure and some shared accesses.
- Details of boundary treatment for the houses and for the western and eastern boundaries along the Groody Road and with the Caisleán na hAbhann estate.
- Specific details with respect to the proposed access and roads arrangements.
- Submit a lighting design in line with Limerick City and County Council's Public Lighting Specification (2022).
- Specific details in relation to surface Water / SuDS.
- To submit an updated AA Screening Statement.
- Details of the Derogation Licence.
- To submit a tree survey.
- To engage a Licenced Archaeologist to undertake a geophysical survey of the site, to undertake test trenching based on any results from the non-invasive survey but also covering a representative sample of the site and submit an updated Archaeological Impact Assessment.

4.3. Applicants Response to Opinion

- 4.3.1. The application includes an LRD Opinion Compliance Statement. The applicant considers that each of the 11 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 on 26th March 2026, subject to 21 conditions, which included the following of note:
 - Condition 2 relates to Development Contribution.
 - Condition 5 relates to a Bond.
 - Condition 7 relates to Purpose Built Student Accommodation Scheme (PBSA) Use specifically relating to *“a. Student accommodation (in accordance with the definition of student accommodation provided under section 13(d) of the Planning and Development (Housing) and Residential Tenancies Act, 2016) or accommodation related to a Higher Education Institute only, during the academic year; or b. Student accommodation or accommodation related to a Higher Education Institute or tourist/visitor accommodation only, during academic holiday periods. The development shall not be used for the purposes*

of permanent residential accommodation, as a hotel, hostel, apart-hotel or similar use without a prior grant of permission”.

- Condition 12 relates to Roads, Access, Footpaths, Parking & Mobility including internal footpath widths, pedestrian crossing points, EV charging spaces (at least 20% provided) and that bicycle parking complies with the Cycle Design Manual.
- Conditions 13 relates to Ecology, specifically *“(a) All ecological mitigation in the Bat Fauna Survey, EclA, and Landscape Plan shall be implemented in full. (b) The removal of the Lesser Noctule bat roost tree shall be carried out strictly in accordance with the NPWS derogation licence, including seasonal restrictions, pre-felling inspections, and supervised removal. (c) A minimum of three Noctule bat boxes and three Leisler’s bat boxes shall be installed under ecological supervision. (d) Swift bricks and at least 5 bird nesting boxes shall be integrated into the development at locations agreed with the Council. (e) A post-construction bat survey and light-spill assessment shall be submitted within 6 months of occupation”.*
- Condition 14 relates to Archaeology – standard requirements in respect to monitoring and reporting and the appointment of a suitably qualified archaeologist during construction.
- Condition 21 relates to Active Travel & Mobility Management Plan in particular, *“(a) Prior to commencement of development, a revised site layout drawing shall be submitted and agreed in writing with the Planning Authority which continues the existing Groody Road cycle lane to meet the new proposed vehicular entrance at Caisleán na hAbhann”.*

5.3. Planning Authority Reports

5.3.1. The Planners’ Report (dated 20th March 2026) can be summarised as follows:

Principle of Development:

- The site is zoned “New Residential” under the Limerick Development Plan.
- Residential, student accommodation and childcare uses are all generally permitted.

- It is considered that the development accords with national, regional and local planning policy promoting compact growth and housing delivery in serviced urban locations.

Site Layout and Urban Design:

- The layout intentionally uses a graduated height strategy i.e. 5-storey student blocks to the north beside existing student accommodation, 4.5-storey apartment blocks in the centre and 2-storey houses to the south and east beside existing housing.
- It is considered that this a logical transition in scale that responds to the surrounding context and reduces impacts on neighbouring homes.

Density:

- Proposed density is approximately 64.7 units per hectare.
- This exceeds the minimum density required by the Development Plan.
- Although above the normal suburban guideline range, this is justified because the site is fully serviced, it is close to UL, employment centres and public transport and National policy supports higher density development in accessible locations.

Housing Quality:

- The 22 houses exceed national minimum floor area standards.
- Private garden sizes are compliant.
- It is considered that the houses provide a high standard of accommodation.

Apartment Quality:

- Apartment floor areas exceed national standards.
- Approximately 80% are dual aspect (well above guideline requirements).
- Private balconies, storage and communal open space all comply with guidelines.
- The apartment design is considered acceptable.

Student Accommodation:

- Student accommodation is appropriate at this location due to proximity to UL (1.5km), existing student accommodation immediately adjoining the site, good walking, cycling and bus connections.
- The applicant demonstrated continuing student demand.
- The argument that additional student accommodation is still required, is accepted.
- Summer/holiday use as short-term accommodation is considered acceptable provided management controls are imposed by condition.
- Concerns regarding over-concentration of student accommodation as addressed.

Childcare Provision:

- A creche for 48 children is proposed.
- The proposal exceeds the childcare demand generated by the development itself.
- Considered a positive addition to local social infrastructure.

Height, Scale and Visual Impact:

- The height strategy is considered appropriate as existing 3–4 storey student accommodation nearby establishes a precedent.
- The proposed buildings are considered visually acceptable.
- Materials and architectural treatment are regarded as high quality.
- The scheme is viewed as compatible with the evolving character of the Groody Road corridor.

Residential Amenity (Privacy, Overlooking, Overshadowing):

It is considered that:

- Minimum separation distances are achieved.
- Daylight and sunlight assessments show neighbouring houses retain acceptable levels of light.
- Overshadowing impacts are not significant.

- Landscaping, building separation and layout mitigate overlooking concerns.
- The development is considered compatible with neighbouring residential amenity.

Open Space and Landscaping:

- Public open space provision meets guideline requirements.
- Significant landscaping is proposed, including 513 new trees, new hedgerows, biodiversity enhancements and playgrounds and amenity spaces.
- The proposed landscaping is acceptable.

Parking and Active Travel:

The parking strategy is generally accepted with regard to the following:

- Overall car parking provision.
- Significant bicycle parking provision.

Issues requiring amendment/conditions:

- EV charging spaces are below Development Plan requirements.
- Some bicycle facilities need redesign.
- Additional covered cycle parking is needed.

Traffic, Access and Road Safety:

- The two-access arrangement (Groody Road and Caisleán na hAbhann) is acceptable.
- Roads Department has no objection subject to conditions.
- Some improvements are required i.e. wider footpaths, additional crossings, better cycle connections, and coordination with future BusConnects works. These matters are considered capable of being addressed through conditions rather than refusal.

Mobility Management Plan:

The Active Travel Team considered the submitted plan inadequate because walking and cycling targets are too low, no car-share targets, Travel Plan Coordinator not identified and monitoring arrangements need improvement.

It is considered that these matters can be resolved by condition.

Environmental Issues

- No Appropriate Assessment is required.
- No EIA is required.
- Flood risk is acceptable.
- Bat impacts can be mitigated through licensing and conditions.
- Archaeological concerns can be addressed through monitoring conditions.

5.3.2. The overall thrust of the assessment is strongly supportive of the development. The main concerns raised by objectors (height, density, student accommodation concentration, privacy, overshadowing, traffic and parking) have either been satisfactorily addressed by the design or can be dealt with through planning conditions. The only notable deficiencies identified relate to EV charging provision, active travel measures and the Mobility Management Plan, all of which are viewed as matters capable of being resolved through conditions rather than grounds for refusal. The Planning Authority recommended a grant of planning permission for this LRD subject to the conditions as noted in Section 5.1.1 above.

5.3.3. Other Technical Reports

- Roads Department – Limerick City & County Council: No objection subject to conditions, in particular Condition 12 as noted above.
- Council Archaeologist - Limerick City and County Council : No objection to the development, subject to conditions requiring: *“(i) four-weeks’ advance notification before any site works, (ii) appointment of a licensed archaeologist to monitor all ground disturbance, (iii) submission of archaeologist details and licence confirmation prior to commencement, (iv) a full monitoring report on completion (or interim reports if phased), including ITM-referenced drawings of areas monitored, (v) immediate cessation of works and notification of authorities if archaeology is uncovered, (vii) full excavation, recording and reporting (to NMS standards) if required”.*
- Active Travel – Limerick City & County Council: Report notes *“The site is well-served by existing bus and cycle infrastructure and is identified as a secondary*

route under LSMATS. The Road Safety Audit highlights issues requiring correction, including footpath widths, pedestrian crossing provision, and safe connectivity between Caisleán na hAbhann, the development and Groody Road. A 2-metre continuous footpath along Caisleán na hAbhann is required. There is also an opportunity to extend the existing Groody Road cycle lane to meet the new site entrance. Cycle parking generally aligns with Development Plan standards; however, covered visitor stands are recommended in several locations. Internal bicycle stores within apartment blocks must comply with the Cycle Design Manual, including space for cargo bikes. Creche cycle parking must clearly distinguish between visitor and staff storage. A Mobility Management Plan has been submitted but requires improvement. Mode share targets for walking and cycling are below recommended levels, no car-share targets are included, and details of the Travel Plan Coordinator are missing. A travel survey and subsequent monitoring will be required. A shortfall in EV parking exists: 32 EV charging spaces are required but only 23 are proposed. Overall, the report recommends further information or conditions to secure: (i) extension of the cycle lane to the new entrance; (ii) footpath width compliance and improved pedestrian crossings; (iii) compliant internal bike stores and additional covered visitor stands; (iv) provision of 32 EV charging spaces; (v) coordination with BusConnects on pedestrian crossing/bus stop layouts; (vi) a revised Mobility Management Plan”.

- Mid-West National Road Design Office - Limerick City & County Council: No observations received.
- Digital Services - Broadband Development Manager Limerick City & County Council:

“Prior to commencement: Developer must submit evidence of consultation with all FTTH providers operating in Limerick (e.g. OpenEir, Virgin Media, SIRO, NBI).

Provide minimum 2 × 110mm telecom ducts from the public road:

- *To each individual house (up to the front door)*
- *To each Multi-Dwelling Unit (MDU) plant room*
- *To the creche plant room*

- *Access chambers required at all end points, road crossings, changes in direction, and at intervals $\leq 250\text{m}$.*
- *All telecom infrastructure must be installed on an open-access, shared-infrastructure basis (LDP Section 8.4.1).*
- *Internal ducting in MDUs must comply with: EU In-Building High-Speed Electronic Communications Regulations 2023. PAS 2016:2010 next-generation access guidelines*
- *Fascia-mounted telecom installations are prohibited.*
- *Developer must submit as-built telecom drawings (PDF + DWG/SHP) prior to handover. Strategy & Non LA Housing Construction Limerick City & County Council: A preliminary Part V letter was issued to applicant on the 28th January 2026 and is included in the planning application”.*
- Fire prevention and Building Control - Limerick City & County Council:
 - *“Student accommodation is also proposed for short-term letting; therefore, blocks must be designed as Halls of Residence, including a minimum of two escape stairways where storey height exceeds 11m.*
 - *Further information required: revised student accommodation proposals demonstrating compliance with Sections 1.4 and 1.5 of TGD B 2024 and Building Regulation B1 (Means of Escape).*
 - *Fire brigade access must comply with Section 5.4 of TGD B 2024.*
 - *Firefighting personnel access must comply with Section 5.5 of TGD B 2024.*
 - *Emergency access routes, turning areas and hardstanding must be kept clear at all times. • Fire Safety Certificates required for the creche and apartment buildings before works commence. • Disability Access Certificates required for the creche and apartment buildings prior to occupation. • All works must comply with the Building Regulations 1997–2024 and the Building Control Regulations 1997–2025”.*

5.3.4. Conditions

- Notwithstanding, the decision of the planning authority to grant 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.

I also refer the Commission to Section 9.9 of my report in this regard.

5.4. Prescribed/Other Bodies

5.4.1. Transport Infrastructure Ireland (17th February 2026) –

TII advises:

- It will rely on the planning authority to apply national policy relating to development that affects or is located near national roads, as set out in the Spatial Planning and National Roads Guidelines for Planning Authorities (2012). TII states that it will not accept any future claims regarding noise, visual impact or other effects arising from the existing national road or any future road scheme currently in planning, should the proposed development be approved.
- The submission also clarifies that it does not constitute consent to access, modify or interfere with any national road infrastructure, including drainage systems, safety barriers, ducting, structures or underground assets.
- Where development works cause damage to any national road asset, TII will require full remediation to its standards, with all associated costs to be borne by the developer.

5.4.2. National Transport Authority (5th March 2026):

The NTA notes that:

- The site lies on Groody Road, where BusConnects Limerick is progressing a network redesign that includes planned enhancements to the two bus stops adjoining the application site. Preliminary designs for upgraded bus stops have already been prepared, and the Authority has observed that the

application's red-line boundary, including a proposed pedestrian crossing, overlaps with the existing bus stop lay-by area.

- The NTA welcomes the provision of a pedestrian crossing, recognising that it supports the use of public transport and active travel for future residents.
- The Authority recommends that the applicant engage directly with the NTA to coordinate the detailed design of the road layout, pedestrian crossing, cycle path and footpath to ensure compatibility with the forthcoming bus stop enhancement works.

5.4.3. Office of Public Works (no report received date indicated) –

- The site falls within the area deemed to benefit from drainage by Channel No.C1 of the Groody Scheme and as a result may be subject to an increased flood risk.
- The Planning Authority should satisfy themselves that due consideration is given to flood risk at this site.

5.4.4. Uisce Éireann (3rd March 2026) –

- A Confirmation of Feasibility has been issued (3rd July 2025) to the applicant advising that water and wastewater connections are feasible without infrastructure upgrades by Uisce Éireann.
- Uisce Éireann notes that the diversion of water supply mains and wastewater sewers are required to accommodate the proposed development, and that the development may impact on private watermain connections to Caislean na hAbhann.
- Uisce Éireann requests a number of conditions to be applied to any grant of permission.

5.5. Third Party Observations (to the Planning Authority)

- 5.5.1. Forty-one (41 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 Height, Scale, Massing & Visual Impact, privacy and overlooking,

Residential Amenity Impacts (Noise, Disturbance, Liveability), Overconcentration of Student Accommodation, Traffic Congestion, Road Capacity & Safety, Estate Access – Vehicular & Pedestrian, Parking Shortfalls & Overspill into Estates, Construction Phase Impacts (7-Year Duration), Short-Term Letting / Dual Use (Student Accommodation to Tourist Use), Incompatibility with Established Residential Character, Green Wedge / Environmental Impacts, Property Devaluation, and Need for Family Housing Instead.

- 5.5.3. The planners report addresses and responds to the issues/concerns raised in the third party observations.

6.0 Planning History

6.1. Subject site:

- 6.1.1. Ref: 10927 – Permission refused by Limerick City and County Council on 20/06/2011 for 70 dwellings comprising 16 detached, 54 semi-detached, 3-storey for the following reason:

“It is considered that the design and layout of the proposed development is sub-standard in terms of the limited mix of house types, the linear layout of the scheme and the poor quality of public open space in terms of design, location, and usability and the creation of an antisocial alley between units 37-38 and 14-15. It is considered that the proposed development, if permitted, would therefore, materially contravene Policy H1 - New Housing Development of the Castletroy Local Area Plan 2009-2015 and would be contrary to the proper planning and sustainable development of the area”.

- 6.1.2. Ref: 021961 – Permission granted by Limerick City and County Council on 07/02/2003 for a 38kV steel mast on an existing line.
- 6.1.3. Ref: 002193 – Permission granted by Limerick City and County Council on 01/05/2001 for a large mixed-use scheme including 191 houses, 95 duplexes, 300 apartments, 149 student apartments, hotel, creche, retail and office units, sports grounds, and the construction of part of the Groody Road.

6.2. Adjoining site directly to the north:

6.2.1. Ref: 012631/ABP Ref: PL 13.129203 permission granted on 25/09/2002, on appeal to (the former) An Bord Pleanála for the construction of 256 no. student apartments, 1 no. caretaker apartment and 193 sq.m. of communal facilities and amenities incorporating 95sq. m of commercial laundry facilities.

6.3. Adjoining site to the northwest - on land fronting the Groody Road and Dublin Road:

6.3.1. Ref: 2560113 - Permission granted by Limerick City and County Council on 25/09/2025 for a Large-Scale Residential Development (LRD) of a Purpose-Built Student Accommodation (PBSA) scheme, for a period of seven years. The development consisted of 196 no. Bed Clusters, is distributed across 5 no. separate blocks, ranging in height from 5 - 8 storeys, with a total of 1,400 no. student bedspaces to be delivered in two phases.

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 2025-2030 – An Action Plan on Housing Supply and Targeting Homelessness

- 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.
- 7.1.4. Section 7.7 of the Action Plan notes that Government is committed to a long-term student accommodation strategy focussed on increasing the supply of student accommodation in line with demand. It outlines that increasing the supply of student specific accommodation will reduce reliance on the private rental market, thereby increasing housing availability for private individuals and families.

Climate Action Plan, 2025 (referenced in conjunction with Climate Action Plan 2024)

- 7.1.5. 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.
- 7.1.6. 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

- 7.1.7. 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”.
- 7.1.8. 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

- 7.1.9. 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.
- 7.1.10. 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.

The National Student Accommodation Strategy 2026-2035

7.1.11. This Strategy outlines practical measures to address affordability, supply and viability while ensuring that future demand is met without additional pressure on the private rental market. The Strategy is built around two pillars as follows:

- Pillar 1: Viability and Supply, focuses on activating supply for the emerging demand of 42,000 student beds, including on and off Campus Purpose Built Student Accommodation (PBSA) and Rent-a-Room beds over a ten-year period to meet the projected levels of demand.
- Pillar 2: Affordability Supports for Students aims to provide targeted financial support directly to students regardless of whether they are Living at Home, in Rent-a-Room accommodation, Private Rental or public or private PBSA.

Section 28 Ministerial Guidelines

7.1.12. 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.
- Section 5.2 of this document relates to Purpose Built Student Accommodation (PBSA).

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 Guide for State Sponsored Student Accommodation (2025)

- This Guide was published on the 24th of June 2025; it provides an iterative framework reflecting best practice supporting the efficient delivery of student accommodation. It is intended, where appropriate, that the standards contained therein can inform the planning and design of off-campus forms of student accommodation that are led by the private sector.

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’).

7.1.13. 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.

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, as varied**

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. I note the following variations to the Plan:

- Proposed Variation 3 to the Limerick Development Plan 2022 – 2028 (on display to 18th May 2026) - To accelerate housing delivery and respond to recent changes in National planning policy, namely the publication of the National Planning Framework (NPF) First Revision and the publication of the following Section 28 Ministerial Guidelines:
 - NPF Implementation: Housing Growth Requirements, Guidelines for Planning Authorities (2025)
 - Planning Design Standards for Apartments, Guidelines for Planning Authorities (2025)

- Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024).

- Variation No. 1 to the Limerick Development Plan 2022 – 2028 was adopted by the Elected Members on the 22nd of May 2023 comprising an amendment to Policy TR P11 Road Safety and Carrying Capacity of the non-national Road Network and Objective TR O37 Land Uses and Access Standards.
- Variation No. 2 to the Limerick Development Plan 2022 – 2028 (as varied) was adopted by the Elected Members on the 30th March 2026 comprising an amendment to Objective TR O37 regarding access to substandard roads.

7.3.3. 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.

7.3.4. 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;'.

7.3.5. 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'.

7.3.6. 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'*.

7.3.7. 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'.

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

7.3.9. 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.

7.3.10. 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' and Student Accommodation 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'.

7.3.11. Specific Policy Objectives:

- 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 HO O8 Student Accommodation *"It is an objective of the Council to:*
a) Support the provision of high quality, professionally managed purpose built student accommodation either on campus, or in appropriate and accessible locations on public transport or cycle networks. All forms of student accommodation shall respect and protect the existing residential amenities of the area in which it is proposed. Student accommodation shall be of appropriate design, in accordance with the Department of Education and Science Guidelines on Residential Development for Third Level Students (1999), and (2005) and any subsequent updates. Applications for change of

use from student housing to any other form of use shall be strongly resisted, without adequate demonstration that there is no longer a need for such use in the area and an over-provision of student housing exists.

b) Ensure that all applications for new off campus purpose built student accommodation, the change of use to student accommodation in existing residential areas, or extensions to existing dwellings to facilitate student accommodation, must include details outlining the presence and distribution of any permanent residential occupiers; the extent of students renting in the private housing market; and the presence of any other housing catering primarily for students and short term lets in the area/estate. The application should address any potential impacts of the proposal on residential amenity and any permanent residents in the area.

c) Require all applications for off-campus purpose-built student accommodation to be accompanied by a Student Management Plan outlining how the scheme will be professionally managed. The Plan shall demonstrate how the development will be managed so as to avoid potential negative impacts from occupants on surrounding properties and neighbourhoods and ensure the maintenance of safe, secure and clean environments for the community, occupants and nearby residents.

d) Ensure permissions for student accommodation will be subject to a condition requiring planning permission for a change of use to any other type of use, including short-term holiday letting. Future applications for this type of change of use will be resisted. Where it is demonstrated that such student accommodation is no longer required, a planning application will require details of a proper management plan for the non-student use of the units to prevent adverse impacts on traditional residential estates”.

- Objective GV O1 Groody Valley “It is an objective of the Council to: a) Require a high-quality landmark design. The proposal shall include an integrated development incorporating the fuel depot site along the R445 Dublin Road. b) Facilitate purpose-built student accommodation where deemed appropriate. c) Require car parking to be located to the rear of any building, or adequately screened and sympathetically integrated within the site. d) Require

connectivity for pedestrians and cyclists to the Groody Valley zoned lands. e) *Ensure the design facilitates access to enable complementary development on the Groody Valley zoned lands*".

- 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. There are no European sites, Natural Heritage Areas (NHAs), or proposed Natural Heritage Areas (pNHAs) in the immediate vicinity of the proposed development site. However, the following European Sites should be noted:

Name	Site Code	Distance from Site
Lower River Shannon SAC	[002165]	1.8km
River Shannon and River Fergus Estuaries SPA	[0040677]	5 km

8.0 The Appeal

8.1. Grounds of Appeal

8.1.1. Two (2 no.) third appeals have been lodged in respect of the proposed development, including one appeal from the Caislean na hAbhann Residents Association (the appeal was prepared by AK Planning and Development Limited).

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

Density and Intensity of Development

- The Planning Authority relied on a headline density figure that understates the true intensity of development.
- The appellants contend that the combination of 95 apartments, 22 houses, and 309 student bedspaces creates a much more intensive form of development than reflected in the reported density calculations.
- They argue the development is excessive for a suburban location and that the Planning Authority did not properly assess whether the overall scale was appropriate to the character of the area.

Height, Massing and Transition to Existing Housing

- A major concern is the introduction of 4.5–5 storey buildings beside a predominantly two-storey residential estate.
- The development does not provide an adequate transition in height.
- Elevated site levels further increase the perceived height and dominance of the buildings.
- The proposal would appear overbearing when viewed from adjoining homes.
- The scale is inconsistent with the established suburban character of Caisleán na hAbhann.

Visual Impact and Residential Amenity

- The appeals argue that the visual assessment was inadequate because:
 - It relied heavily on CGI imagery and promotional material.

- No verified photomontages were provided from the most affected houses.
- The effects of building height, ground levels and massing on nearby residents were not properly assessed.
- The appellants contend this undermines confidence in the conclusions regarding visual impact and residential amenity.

Traffic, Access and Road Safety

- The existing residential estate road was designed as a local access road rather than a distributor route.
- Routing development traffic through Caisleán na hAbhann is unnecessary.
- Traffic surveys relied on outdated data.
- The assessment failed to adequately account for cumulative traffic impacts from other developments in the area, including the Bon Secours Hospital expansion, Educate Together School and the approved 1,400-bed student accommodation scheme.
- Road Safety Audit concerns regarding visibility, footpaths, crossings and conflict between pedestrians and vehicles remain unresolved.

Parking Provision

- Parking provision is insufficient, particularly for student accommodation.
- Only 26 student parking spaces for 309 student bedspaces.
- Existing parking overspill problems already occurring around nearby student accommodation.
- Risk of illegal and unsafe parking within surrounding residential estates.

Student Accommodation Concentration

- A key planning issue raised is not the principle of student accommodation itself, but its concentration.
- The Planning Authority failed to properly consider the cumulative effect of student accommodation already approved in the area.

- The recently approved 1,400-bed student scheme nearby was not adequately factored into the assessment.
- Multiple large student schemes along the Groody Road corridor risk creating an over-concentration of one residential type.
- This could undermine balanced community development and adversely affect established residential neighbourhoods.

Short-Term Letting / Tourist Accommodation Use

- Allowing student accommodation to operate as tourist or short-term accommodation outside term time materially changes the nature of the development.
- The impacts of this use on noise, activity levels, management and residential amenity were not properly assessed.
- The issue should have been assessed before permission was granted rather than addressed through management arrangements later.

Reliance on Planning Conditions

- Several important matters were deferred to post-permission conditions rather than being fully assessed beforehand, in particular traffic management, mobility measures, transport integration, and operational management arrangements.
- These are fundamental aspects of the development and should have been resolved at application stage.

Open Space and Recreational Provision

- Much of the open space is incidental rather than genuinely usable.
- The development lacks sufficient recreational facilities for a scheme of this scale.
- Greater provision should be made for active recreation and children's play facilities.

8.2. Observations

8.2.1. Three (3 no.) observations were received from local residents of the adjoining residential development at Caisleán na hAbhann. The key planning issues raised in the observations are similar to those raised in the appeals including conflict with the Development Plan, excessive density, height and scale, impact on residential amenity, over-concentration of student accommodation, insufficient parking and traffic impacts, objection to Short-Term Letting and opposition to vehicular and pedestrian links through Caisleán na hAbhann.

8.2.2. The following additional concerns were also raised:

- Biodiversity and Green Wedge Impacts – concerns regarding effects on the Groody Valley Green Wedge in particular, trees, hedgerows, bat habitats and land ownership boundaries.
- Deficiencies in Public Consultation – claims that local residents were not adequately engaged during the Large Residential Development process.
- Relief Sought – refusal of permission or substantial revisions, including reduced height, removal of student accommodation and short-term letting, and a stronger focus on family housing.

8.3. Further Observations

8.3.1. None.

8.4. Planning Authority Response

8.4.1. No response received.

8.5. Applicant's Response

8.5.1. The applicant provided a detailed response on 8th May 2026. The response also includes verified photomontages, which indicate views from 4 no. locations i.e. from Groody Road roundabout looking towards the site, and from three locations within the adjoining Caisleán na hAbhann residential development.

8.5.2. The photographs present a photograph of the location with and without the proposed development i.e. the proposed development is delineated in red outline, where visible.

8.5.3. I have summarised the key points as follows:

Density, Scale and Height

- Net density is 64.7 dwellings per hectare, which they argue complies with national planning guidelines and exceeds the Limerick minimum requirement of 45 dph.
- A minor error in the original plot ratio (0.406) was acknowledged and corrected to 0.67, applicant state this has no material impact.
- Heights are deliberately stepped i.e. 5-storey student blocks in the north beside existing student buildings; 4-storey apartments in the centre and 2-storey houses adjoining existing homes in Caisleán na hAbhann.
- It is argued that this transition protects residential amenity while achieving national compact growth objectives.

Visual Impact and Residential Amenity

- Additional verified views and photomontages were produced to demonstrate limited visual impacts.
- Existing roads, open space and the Groody Valley provide buffers around the site.
- Daylight and sunlight studies concluded impacts on neighbouring homes would be negligible and comply with BRE guidance.
- Open space provision is 15% of the site, exceeding the 10% minimum requirement.

Traffic and Car Parking

- Traffic assessments show only modest additional peak-hour trips and conclude surrounding junctions have adequate capacity.
- A Stage 1 Road Safety Audit was completed and all recommendations were incorporated into revised plans.
- The development provides 159 parking spaces compared with a maximum permissible 187 spaces under the Development Plan.

- Reduced parking is intentional to encourage public transport, walking and cycling, in line with climate and mobility objectives.
- Student accommodation parking actually exceeds the required standard (26 spaces provided versus 23 required).

Student Accommodation

- Student accommodation represents roughly 40% of the overall development, with permanent housing making up the majority.
- Even including the permitted 1,400-bed Groody Student Village, students would remain a minority of the wider population.
- The proposal is supported by the National Student Accommodation Strategy 2026–2035, which identifies a need for 42,000 additional student beds nationwide.
- Overall, the developer contends that the proposal is a policy-compliant, mixed-tenure scheme with acceptable density, height, traffic impacts and student accommodation levels, and therefore requests that An Coimisiún Pleanála uphold Limerick City & County Council's decision to grant permission.

9.0 Assessment

9.1. Having examined the application details and all other documentation on file, including the submission received in relation to the appeal, including the reports of the planning authority, following an inspection of the site, and having regard to relevant local/regional/national policies and guidance, I consider that the main issues in this appeal are as follows:

- Principle of Development
- Density, Scale and Height
- Transportation and Parking
- Design Strategy
- Residential Amenity and Residential Standards

- Ecology
- Other Matters

9.2. Principle of Development

Zoning

- 9.2.1. The appeal site is on lands zoned in the Limerick Development Plan 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.”*.
- 9.2.2. The proposed development includes the provision of 95 apartments and 22 houses, in addition to the proposed PBSA (totalling 309 bedspaces), and creche facility at the edge of a regional city.
- 9.2.3. In this regard, the site is suitably zoned for residential development, including student accommodation and 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.
- 9.2.4. Section 11.4.4.7 of the Plan references student accommodation noting that the Council will support the provision of on-campus accommodation and purpose built-professionally managed student accommodation off-campus at suitable locations.

Moreover, professionally managed and purpose built third level student accommodation is permitted under this land use zoning objective.

Core Strategy

- 9.2.5. 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 Annacotty¹.
- 9.2.6. 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.
- 9.2.7. 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.
- 9.2.8. 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, I am satisfied that the principle of the proposed development, which includes 95 apartments and 22 houses, to be acceptable.

Concentration of Student Accommodation

- 9.2.9. There are two third level colleges in the vicinity of the appeal site. University of Limerick (UL) is located approximately 1.5 km away from the appeal site, while Limerick College of Art and Design (TUS) is situated circa 3.2km from the site. I note that the Student Accommodation Demand and Concentration Report submitted by

¹ It is noted that Proposed Variation No. 3 to the Limerick Development Plan 2022–2028 proposes amendments to the Housing Strategy, Settlement Capacity Audit and Core Strategy to reflect updated national planning policy and to further support compact growth and the delivery of housing on serviced lands. - [Proposed Variation No. 3 | Limerick.ie](#)

the application references the Technological University of the Shannon and Mary Immaculate College. The Mary Immaculate College is located within 6 km of the site, however the Technological University of the Shannon is not proximate to the site. Notwithstanding, the site is well located, along an accessible route to UL, in particular, which has the benefit of high frequency transport services which will be enhanced in the future. Having regard to the rising population, there will be a greater need for student accommodation and in my view, it constitutes good planning to locate student accommodation proximate to accessible routes to the college(s). I note that Section 11.4.4.7 Student Accommodation of the Development Plan notes that *“The location of student accommodation: The Council will prioritise student accommodation on campus or within 1km distance from the boundary of a Third Level Institute, followed by locations within close proximity to high quality public transport corridors, cycle and pedestrian routes and green routes”*.

- 9.2.10. The third party appeals/observations state that the concentration of student accommodation proposed and the cumulative effect of student accommodation already approved in the area has not been assessed. Multiple large student schemes along the Groody Road corridor risk creating an over-concentration of one residential type, which would adversely affect established residential neighborhoods.
- 9.2.11. The planning authority concluded that the location is appropriate and desirable for student accommodation, providing safe, direct and sustainable access to the University and also noted that the proposal addresses an identified shortfall in student bedspaces in Limerick and has been designed to an appropriate standard with a clear management framework in place and concluded that the PBSA element is considered to comply with the proper planning and sustainable development of the area.
- 9.2.12. The immediate surrounding area is suburban in character with a variety of uses evident including adjoining low density residential development and additional commercial uses at nearby Garryglass to the southwest and Childers Retail Park further to the west of Groody Road. I note that there is a recently constructed PBSA development immediately to the north of the appeal site (Brookfield Hall – comprising 550 bedspaces).

- 9.2.13. The Student Accommodation Demand and Concentration Report submitted by the application references Edinburgh City Council's Student Housing Guidance, and notes that there is no indicator / threshold of acceptability in Ireland. The report considered that due to limited housing provision within a 1km radius of the site, a wider demographic assessment was conducted using the Ballysimon Electoral Division (ED), which encompasses the University of Limerick and Castletroy urban areas. Based on 2022 Census data, the ED has a population of 16,540 persons, with students accounting for 19.9% (3,306 individuals) of the population over the age of 15. The proposed development will introduce an additional 309 students to the area. This influx will increase the local student concentration within the ED from 19.9% to 21.4%. The resulting concentration remains within acceptable planning thresholds.
- 9.2.14. The report notes that the National Student Accommodation Strategy (NSAS), 2017, detailed that there were 6,816 no. student bedspaces in Limerick in 2017. The report outlines the projected (planned) supply and demand for student bedspaces in Limerick to 2024 which is detailed in the NSAS as follows:

Location	Supply 2017	Demand 2017	Supply 2019	Demand 2019 (excess Demand)	Supply 2024	Demand 2024 (excess demand)
Limerick	6,816	7,724 (908)	6,831	9,000 (2,169)	8,181	9,798 (1,617)

Table 1.0 Projected supply and demand for student bedspaces in Limerick (National Student Accommodation Strategy)

- 9.2.15. In addition, the applicant provided a review of planning applications granted permission for purpose-built student accommodation in Limerick City has been undertaken which takes into account developments permitted since Q3 2019 as follows:

Name	Location	Approx. Distance from Site	Capacity (bedspaces)
Ashdown Student Village	Courtbrack Avenue, off South Circular Road	5.9km	210
Courtbrack Student Accommodation	Courtbrack Avenue	5.9km	8
Punchs Residence	Punch's Cross, Limerick	5.3km	72
Clontarf Hall	Clontarf Place	4.4km	48
City Campus	Edward Street, Limerick	4.3km	660
The Ostia Community	Augustinian Lane, Thomas Street v	4.7km	7
Grove Island Student Village	Grove Island, Corbally, Limerick	3.2km	300
Parkview Hall	Rhebogue, Dublin Road	1.75km	210
Cratloe Wood Village	Old Cratloe Road	6.5km	600
Thomond Student Village	Old Cratloe Road	6k.5m	570
Groody Student Park	72, Groody Student Park, Castletroy	500m	147
Courtyard Student Village	70, Bru na Gruadan, Castletroy	440m	225
Brookfield Hall	Castletroy	Neighbours the Site	550
University of Limerick On -Campus Accommodation	University of Limerick, Garraun, Limerick	1.5km	2,505
Troy Village	University of Limerick (Off Campus)	500m	170
Total			6,282

Table 3.0 Existing Student Accommodation Facilities in Limerick

- 9.2.16. The proposed development seeks to deliver 309 student bedspaces on a residentially zoned site located within 1.5km of the University of Limerick (UL). While Section 11.4.4.7 of the Limerick Development Plan prioritises student accommodation within 1km of third-level campuses, the subject site is considered acceptable at this location given its immediate environment which is in close proximity to high quality public transport corridors, cycle and pedestrian routes, and as such complies with the Development Plan. This also includes its location adjacent to existing student housing (Brookfield Hall), proximity to existing and proposed public transport, and established pedestrian and cycle connectivity to UL.
- 9.2.17. Data presented by the applicant in their Student Accommodation Demand and Concentration Report confirms an acute local deficit in Purpose-Built Student Accommodation (PBSA). Since the publication of the National Student Accommodation Strategy (NSAS) in 2017, only 2,008 bedspaces have been permitted or built in Limerick City, with approximately 1,921 of those remaining unbuilt and only 87 operational. Based on NSAS demand projections, a net shortfall of 959 bedspaces persists across the city, at time of writing the NSAS. Although the immediate vicinity already accommodates approximately 922 student bedspaces, the

addition of the proposed units will not result in an overconcentration within a 1km radius.

- 9.2.18. I note the recently permitted Groody Student Village (P25/60113) comprising 1,400 student bedspaces immediately adjoining the site. The report concludes that, when assessed cumulatively, the proportion of students residing within 1km of the site would increase to 21.4%, and to 27.4% within the wider Ballysimon Electoral Division.
- 9.2.19. The report further notes that the site occupies a sustainable location within close proximity of the University of Limerick, adjoining existing student accommodation and served by established public transport, walking and cycling infrastructure. In this regard, the concentration of PBSA reflects the locational strategy of the Development Plan (Section 11.4.4.7 Student Accommodation) rather than an inappropriate clustering of development.
- 9.2.20. While acknowledging the significant recent permission for 1,400 bedspaces, the report concludes that Limerick continues to experience a substantial shortfall in purpose-built student accommodation, with many permitted schemes not yet delivered.
- 9.2.21. I am satisfied that the proposed PBSA, when taken in conjunction with the permitted PBSA in the vicinity would not result in an unacceptable over-concentration of student accommodation in the immediate area but would contribute towards addressing an identified accommodation deficit in an appropriate and sustainable location.
- 9.2.22. Within this wider neighbourhood there are a wide range of housing types and diversity in the population. As such, I am satisfied that the proposed development would not result in a neighbourhood with an imbalanced community or conflict with the community profile of this area. I do not consider that the proposed development would affect community cohesion in an adverse manner and would be in accordance with the Development Plan in particular Section 11.4.4.7 Student Accommodation.

Conclusion:

- 9.2.23. I note that LCC had no issue with the nature of the proposed development in the context of the site zonings and, having regard to the foregoing, I consider that the

principle of development on site is acceptable, subject to the following detailed consideration.

9.3. Density, Scale and Height

- 9.3.1. The issue of density and height are linked and have been raised in the appeals/observations as concerns. It is contended that the application exceeds the density for the suburban area, and is excessive, with the methodology used understating the density of the student accommodation by 50%. With respect to scale and height it is considered that the proposal fails to provide any transition in height or massing relative to the adjoining estate, which is inconsistent, overbearing and out of character with the area. Concern is also raised in respect to the elevated site levels, which further increase the perceived height and dominance of the buildings.

Density

- 9.3.2. The proposed developments provide for a total of 194 residential units for density calculation purposes, comprising 95 apartments, 22 dwelling houses, and 309 student bedspaces, with the latter equating to 77.25 units². This results in a net residential density of 64.7 units per hectare, based on a net developable area of 3 hectares.

Development Plan

- 9.3.3. As referenced above, the site is categorised as Tier 1 (Serviced) with full availability of water, foul drainage, surface water infrastructure, footpaths, lighting and road access, and is located within an established suburban context proximate to schools and public transport services.
- 9.3.4. Table 2.6 in the Development Plan specifies that within Density Zone 2: Intermediate Urban Locations/Transport Corridors, that “*A minimum net density of 45+ dwelling units per hectare are required at appropriate locations within:*
- a. 800 metres of (i) the University Hospital; (ii) Raheen Business Park; (iii) National Technology Park; (iv) University of Limerick; (v) Technological University of the Shannon; (vi) Mary Immaculate College;*

² The Compact Settlement Guidelines (2024) states that ‘When calculating net densities for shared accommodation, such as student housing, four bed spaces shall be the equivalent of one dwelling’

b. 500m of high frequency (min. 10-minute peak hour frequency) existing or proposed urban bus services; and

c. 400m of reasonably frequent (min. 15-minute peak hour frequency) urban bus services”.

9.3.5. The appeal site is located along the Groody Road which provides public transport via route 310 (on Groody Road) and routes 304/304A on the Dublin Road, approximately 900m away. I also note that the appeal site is located within 1.5km of the University of Limerick.

9.3.6. Given the location of the lands which states that the minimum density of 45+ dwellings units are required on these lands. The proposed development of 64.7uph exceeds the minimum net density standard set out in the Development Plan (Density Zone 2, Table 2.6 of the Plan) and having regard to the location of the appeal site is in my view compliant with the provisions of the plan. I also note that there is no maximum density standards promoted in the Development Plan.

Compact Settlement Guidelines

9.3.7. 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 ‘City - Suburban/Urban Extension’ in the range of 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).

9.3.8. To this end, the site is located proximate to existing and proposed high-frequency bus corridors. The site is c. 500m from the planned 15-minute frequency service on the R445 Dublin Road and approximately 850–900m from the proposed 10-minute frequency BusConnects corridor on Plassey Park Road / Dublin Road, therefore, having regard to Table 3.8 of the Guidelines, I consider that the site is located in an Intermediate Location.

9.3.9. 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.

- 9.3.10. I note that the proposed housing density at 64.7 dwelling units per hectare (dph) net, is at the upper end of the spectrum noted in the Guidelines, however I am satisfied that the density as proposed can be supported on this site based on its location and public transport connections.

Conclusion

- 9.3.11. Having regard to the Development Plan, I am satisfied that the proposed density accords with the minimum housing target as set out in Table 2.6 in the Development Plan and also is appropriate in the context of the site location along the Groody Road, where higher densities are permitted and as much I am satisfied that no material contravention of the Development Plan arises (i.e. Section 2.3.5.2 Density - Table 2.6).
- 9.3.12. The proposed development also accords with the recommend density for the sites located as identified in Tabel 3.2 of the Compact Guidelines which identifies a range of 35 – 50 dup (net), with increased densities of up to 100 dph (net) open for consideration at ‘accessible’ suburban / urban extension locations (as per Table 3.8 of the Guidelines).
- 9.3.13. 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 above.

Height

- 9.3.14. The current 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 accessed on a case-by-case basis.

- 9.3.15. Whilst the specific site is not identified in the Building Height Strategy, the subject site is located within Castletroy, and therefore I reference "*Building Height Strategy – Castletroy/University of Limerick*", in this regard. 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 apartment building heights will range from 16.2 metres - 16.6 metres for the proposed Block Nos. A - D, (4 – 4.5 stories in height) with the proposed student blocks 1 – 4 at a height of 16.575 metres (5 storey in height). The proposed apartment building A is located to the southern section of the site, with the proposed apartment blocks B, C and D located centrally within the site. The proposed student blocks are located to the northern portion of the site.
- 9.3.17. The appeals raise concern with respect to the proposed 4.5-5 storey buildings at this location with no transition in height coupled with the site levels will impact on the adjoining dwellings and is inconsistent with the area.
- 9.3.18. Whilst I acknowledge that the proposed apartment and student blocks will be visible from the front of the aforementioned dwellings, the proposed apartment block A will be positioned to the south of the site and is some 26.3 metres from the side gable elevation of the dwellings to the east at Nos. 40 and 41 Caisleán na hAbhann. The proposed apartment blocks B and C are some 23 – 25 metres from the front of the dwellings at Nos. 177 – 186 Caisleán na hAbhann. The proposed student block are positioned some 31 – 33 metres from the side gable of No. 189 Caisleán na hAbhann and the rear of No. 231 Caisleán na hAbhann, respectively.
- 9.3.19. I also note the height of the existing student accommodation development (Brookfield Hall) directly adjoining the site to the north of the appeal site, which extends to 4 storey in height.
- 9.3.20. Given the location of the appeal site, adjoining the Groody Road and its relationship with the adjoining estate at Caisleán na hAbhann and the existing 4-storey student

accommodation site to the north, I do not consider the proposed height of the proposed development to be excessive in the context of a housing development, which has an area of approximately 3.23 hectares situated between Groody Road to the west and Caisleán Na hAbhann to the east is capable of setting its own character given its location. Moreover, the overall proposal provides two-storey dwellings, to the central and southern portion of the site.

9.3.21. The appellants reference that there is no transition in building height across the site, I note that the development has concentrated the proposed increased height to the south and northern portions of the site. The proposed houses are centrally located within the site, which are two storey, with the development increasing in height towards the north with the proposed apartment blocks (16.2 metres in height) and student accommodation (16.5 metres). I note that the tallest blocks to the north at 16.5 metres, adjoin the existing student development. As such, I am satisfied that the applicant has considered the adjoining development as part of the overall height strategy for this development and given the location of the site relative to the Groody Road and the layout of the adjoining estate at Caisleán na hAbhann, I am satisfied that the proposed building heights are acceptable in this location and complies with the Building Height Strategy for Limerick City and the Limerick Development Plan and will provide for a development that will integrate with the existing area.

9.3.22. 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, 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, whilst the development will have an impact on the existing area, I am satisfied that this will not result in a negative 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.

National Policy and Regional Guidelines

9.3.23. 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.

9.3.24. 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.

9.3.25. 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*”.

9.3.26. 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*”.

9.3.27. The Design Guide for State Sponsored Student Accommodation 2025 reflects guidance on new design standards for state-sponsored on-campus student accommodation which will also inform that of off-campus PBSA schemes led by the private sector. This Guide refers to different types of student accommodation including twin/double/accessible room/studio but primarily focuses on cluster design whereby a number of study-bedrooms are grouped together sharing a kitchen, living

and dining area. Section 1.1 of the Guide states that it is an iterative document and will be extended to include standards relating to other design considerations e.g. guidance on Studios as a typology. I note that the Guide does not provide clarity on density calculation for PBSA schemes.

Conclusion:

- 9.3.28. Accordingly, I am satisfied that the principle of the proposed large scale residential development on these lands, in particular the density and height of units proposed accords with the Limerick Development Plan, 2022 – 2028 and the relevant national and regional policy guidance noted above.

9.4. Transportation and Parking

- 9.4.1. The core focus of the third party appeals and observations relate to traffic, safety, access/permeability and insufficient parking, which will result in parking overspill and illegal parking. The appeals repeatedly frame these as the principal planning concern, especially regarding the proposed vehicular and pedestrian links through Caisleán na hAbhann from the appeal site.
- 9.4.2. I will address the proposed access and layout first and then consider the issues raised with respect to traffic generation, parking, etc.

Proposed Access and Layout

- 9.4.3. In respect to the proposed access, the proposed development is served by two vehicular access points, one from Groody Road serving the apartment blocks, student accommodation and the crèche, and the second from Caisleán Na hAbhann serving the housing element. The proposed site plan identifies the proposed internal street layout, which includes pedestrian and cycle connections between both road frontages and across the site, including a pedestrian crossing proposed on Groody Road to facilitate safe pedestrian movements within the site and the adjoining lands and future public transport connections proposed along the Groody Road.
- 9.4.4. The proposed vehicular access to the Groody Road is at the midway point of the site and serves most of the proposed development. The existing trees are proposed to be removed at this location to provide a splayed access with 49 metre sightlines proposed in both directions, in accordance with DMURS. A pedestrian crossing is

also proposed, which will assist in traffic calming at this location. I am satisfied with the proposed access to Groody Road.

- 9.4.5. As noted above, several third party appeals and observations cite concerns in respect to the proposed access to the site from Caisleán Na hAbhann, impact on the existing dwellings at Caisleán Na hAbhann, the increased traffic from the development and the negative impact this will have on the residents in Caisleán Na hAbhann, the suitability of the estate road for such traffic and safety issues.
- 9.4.6. In respect to the proposed entrance to Caisleán Na hAbhann, I note that this access will serve the proposed dwellings (22 no.) and the proposed apartment block A (29no. apartments to the southern portion of the site).
- 9.4.7. The Caisleán Na hAbhann access road extends northwards along the eastern boundary of the appeal site for its overall length. This access road has two no. further access roads off the main Caisleán Na hAbhann road to serve the residential estate. Having regard to the position and width of the proposed entrance to Caisleán Na hAbhann, which is to the northwest of the existing access road off Caisleán Na hAbhann and the separation distance to the adjoining dwellings at Caisleán Na hAbhann, I am satisfied that the internal road layout and proposed access points are acceptable.
- 9.4.8. I acknowledge that there will be a greater volume of traffic as a result of the development, however, there will be a range of options provided for access into the site as the proposed development will be served by two access points. I further note that the proposed access onto Groody Road will provide access to the proposed PBSA (309 bedspaces), 134 apartments and creche and the proposed access onto Caisleán Na hAbhann will provide access to the remainder of the development i.e. 22 no. dwellings and apartment block A. I am satisfied that the potential impact of any increased traffic associated with the proposed development has been fully assessed as part of the proposed development and that the proposed access arrangements are acceptable with respect to traffic and pedestrian safety.
- 9.4.9. 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.

9.4.10. The planner's report notes that the Active Travel Section of Limerick County Council notes that "*The Road Safety Audit highlights issues requiring correction, including footpath widths, pedestrian crossing provision, and safe connectivity between Caisleán na hAbhann, the development and Groody Road*". I note Condition No. 9 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, 9, for the agreement of the Planning Authority prior to the commencement of development on site and prior to the occupation of the development.

Traffic Generation:

9.4.11. 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).

9.4.12. 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.

9.4.13. The site is also located in an established urban area adjoining an existing residential development and student accommodation. I consider that the provision of two access points to the site i.e. from Groody Road and Caisleán Na hAbhann, 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 Caisleán Na hAbhann, in particular.

9.4.14. The applicant has submitted a Traffic and Transport Assessment in support of the development. The assessment includes an analysis of the existing traffic conditions and an analysis of the existing road network. The appellants raise concerns regarding the baseline data used in the assessment.

9.4.15. With respect to public transport and walking, the assessment also notes the existing public transport connections to the site, and I am satisfied that the existing site benefits from good levels of existing public transport and walking/cycling infrastructure, which will assist to encourage sustainable modes of travel for residents and visitors to/from the proposed development. I also note the distance of the proposed development to Limerick University (UL) and the potential public transport connections from the site to UL.

9.4.16. Traffic counts were classified counts were carried out on the 1st day of October 2024 (during a 12-hour period) at different locations including:

- Groody Road Roundabout;
- Caisleán Na hAbhann;
- Groody Road (south);
- Garryglass Roundabout;
- Groody Road (north);
- R527 (east);
- Garryglass Road;
- R527 (west); and,
- Bloodmill Road.

9.4.17. The traffic count data was used to develop an ARCADY model of the existing Garryglass roundabout and the Groody Road roundabout. The traffic count data was used to develop an PICADY model of the proposed Groody Road / Development Access priority junction.

9.4.18. The surveys were carried out on the date identified above to ensure that flows were representative of normal term time and hence not affected by school holidays or other public holidays or events. Whilst the appeals/observations query the baseline data given that the survey details pre-date a number of significant and material changes in the local traffic environment. I note that the applicant's response to the appeal's states that the traffic surveys were undertaken after the opening of the Limerick Educate Together Secondary School. The response also notes that the

Bons Secours Hospital opened on a phased basis in September 2025, and was not fully operational until March, 2026, after the planning application was submitted.

- 9.4.19. While I acknowledge that the TTA may not have taken account of the operational traffic flow arising from the Bons Secours Hospital, I note that the TTA has taken forecast growth into consideration as part of the assessment and used medium growth factors in the assessment. As such, I am satisfied that the surveys are complete and provide an appropriate and robust representation of a neutral month during a period of normal school and employment activity in the area, taking medium growth factors into consideration.
- 9.4.20. With respect to the Bons Secours Hospital, I do not consider that the TTA is incomplete given the lack of consideration in this regard and I note that the TTA has taken forecasted growth into consideration as part of the overall assessment. I further note that the TTA assessment has indicated that the adjoining road network will operate within capacity with minimal queues and delays when the development is operational.
- 9.4.21. The traffic generation potential of the proposed development has been estimated using The Trip Rate Information Computer System (TRICS) software modelling database.
- 9.4.22. It is estimated that the total vehicle movements generated by the proposed development (including the proposed houses, apartment units and creche) will be 33 arrivals and 54 departures in the AM peak (two-way total of 87). The total number of vehicle movements in the PM peak hour will be 62 arrivals and 34 departures (two-way total of 96).
- 9.4.23. I note that the traffic generation and trip distribution has not specified the number of departures from each proposed access i.e. Groody Road and Caislean na Abhann, however it is presented in terms of trip rates per residential unit (i.e. house and apartment) and creche. I consider this to be acceptable and presents an accurate depiction of the traffic generation and trip distribution from the proposed development.
- 9.4.24. I am satisfied with the accuracy and traffic generation figures presented for the scale of the proposed development. I also note that Section 4.1.3 of the Traffic and

Transport Assessment includes an assessment of the proposed creche and considers the trip generation, as noted in the above total vehicle movements.

- 9.4.25. As part of the junction analysis the following scenarios were modelled – 2024 Survey Year, 2028 Opening Year, 2033 Opening Year + 5 Years and 2043 Opening Year + 10 Years. Each year was modelled with and without development at the junctions referenced in Section 9.4.12 of my assessment above.
- 9.4.26. In respect to the junction analysis the assessment notes that junction modelling undertaken for the study network demonstrates that in 2028, 2033 and 2043 with an increase in background flows and the proposed residential development operational the proposed Groody Road / Development Access priority junction will operate within capacity with minimal queues and delays during the AM and PM peak period. I note that the results are fully consistent with what would be expected in a busy, expanding urban environment that has undergone significant recent development, with multiple new residential, commercial, and transport-related projects adding to background demand.
- 9.4.27. Overall, I am satisfied that the analysis presented confirms that the proposed development can be accommodated within the future road network, and that the proposed access arrangements could safely and adequately accommodate traffic levels as a result of the proposed development.
- 9.4.28. The Traffic Flow Sheets (Appendix C of the TTA) demonstrate that the proposed development will result in only a modest increase in peak hour traffic, generating 95 two-way vehicle trips during the AM peak (33 inbound / 62 outbound) and 88 two-way trips during the PM peak (54 inbound / 34 outbound). This equates to an approximate increase of 7.7% (AM) and 6.1% (PM) in traffic at the Groody Road Roundabout, and only 2.9% (AM) and 2.3% (PM) at the higher-volume Garryglass Roundabout, where traffic is dispersed across multiple approaches. Despite these additional movements, the ARCADY and PICADY assessments confirm that the Groody Road Roundabout continues to operate within capacity, while the Garryglass Roundabout remains constrained primarily by existing and forecast background traffic rather than development-generated trips. Although a slight uplift in queues and delays is predicted, the increases are marginal, with RFC values remaining within acceptable operational limits at the assessed junctions, demonstrating that the

surrounding road network retains sufficient residual capacity to accommodate the proposed development without giving rise to any significant or severe traffic impact.

- 9.4.29. Moreover, I am satisfied that the proposed vehicular access points i.e., Groody Road and Caisleán Na hAbhann residential access road, would alleviate any impact on the adjoining road network in particular at Caisleán Na hAbhann, to accommodate the scale of the proposed development and that the planning application has provided appropriate access points to the subject site to cater for the proposed development.

Construction Traffic and Impacts:

- 9.4.30. Uncertainty regarding construction access and the suitability of the existing roads for construction vehicles were raised as concerns by both third party appellants and observers to the appeal. I also consider that construction traffic and impacts falls under the assessment of the traffic and parking issues, in particular the issue with respect to overspill parking to Caisleán Na hAbhann estate road.
- 9.4.31. The application documentation includes a Construction Environmental Management Plan (CEMP) for the development, including construction access, traffic management, construction parking, pollution protection measures and so on. During construction, vehicles are to access to the site will be via the Groody Road. Construction vehicles will not be permitted to turn right onto the Groody Road when exiting the development site to the west. They will be obliged to turn left and interchange at the adjacent roundabout. In order to assist with driver behaviour, it is proposed to install temporary bollards to prevent construction vehicles from turning right. It is clear from the information submitted as part of the planning application (i.e. the CEMP), that the only option will therefore be to join the eastbound lane on the Groody Road by turning left at the entrance when safe to do so.
- 9.4.32. I also note that contractor parking will be on-site in compound located adjacent to site office and welfare facilities.
- 9.4.33. I acknowledge that some disruption will be expected during the construction period with respect to construction traffic, etc. however, I consider that construction traffic would have negligible impact on local network performance, human health, safety, and existing residents.

- 9.4.34. In respect to noise and dust the CEMP includes details in respect to dust, noise and vibration. However, should the Commission be minded to grant permission I would recommend that the applicant/developer submit a site specific Construction & Environmental Management Plan (CEMP) for the proposed development, ensuring best construction practices for the written agreement of the Planning Authority.
- 9.4.35. Additionally, in accordance with the decision of the planning authority (Condition 15), should the Commission be of a mind to grant permission, I would also recommend the inclusion of a condition requiring the applicant to submit a Construction Management and Delivery Plan.

Safety

- 9.4.36. 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 and that the safety concerns associated with Caisleán Na hAbhann remain unresolved.
- 9.4.37. 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 would be acceptable with respect to traffic and pedestrian safety.

Car Parking/Bicycle Parking Provision and Access to Public Transport:

- 9.4.38. The third party appeals/observations express concerns regarding the insufficient parking provision to serve the proposed development, in particular the proposed student bedspaces. In respect of car parking, the proposed development provides 159 no. car parking spaces are proposed to be provided, comprising 125 no. spaces serving the houses and apartments, 26 no. spaces serving the Purpose Built Student Accommodation, and 8 no. spaces serving the crèche. One car share space is also provided.
- 9.4.39. 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.
- 9.4.40. Table DM 9 (a) of the Limerick Development Plan addresses car parking and bicycle parking requirements for Limerick City and Suburbs (in Limerick) according to the parking zones, the site is located within zone 2. The Development Plan allows a

maximum of 169 no. spaces for the proposed development, however, 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, which aligns with the mobility and mode shift objectives outlined in the Mobility Management Plan (MMP). The MMP places emphasis on reducing car dependency and encouraging walking, cycling and public transport use, supported by measures such as resident travel information, a mobility manager and behavioural change initiatives.

9.4.41. I note that public transport accessibility is strong, with a bus stop located directly on Groody Road adjoining the appeal site to the west and several bus routes serving the immediate area, supplemented by planned future service enhancements under BusConnects network. 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 manger will liaise with the residents and the community to improve the accessibility of the facilities over time. I also note the car share space proposed within the scheme.

9.4.42. With respect to the short stay summer use, I note that this is to take place outside of the academic year and given the accessible location of the site with good public transport links, and the extent of parking proposed to serve the scheme, I do not consider that the short-term letting use would impact negatively on parking in the area and would can accommodated within the scheme.

9.4.43. 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, including the short-term stay summer use, and complies with the Development Plan, Table DM 9(a): Car and Bicycle Parking Standards Limerick City and Suburbs (in Limerick) Mungret and Annacotty, for all proposed uses in this regard.

- 9.4.44. 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.
- 9.4.45. 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 7.3 no. car parking spaces. As part of the proposal 8 no. car parking spaces, including 1 no. disabled parking space and a set down area have been provided for the proposed creche, which is acceptable and accords with the Development Plan.
- 9.4.46. The planners report considered that a shortfall in EV parking exists and a condition was included by the planning authority to increase EV charging provision, condition 12 (c) of the Planning Authority grant of permission relates. The Development Plan requires 32 EV charging spaces to be provided i.e. Table DM 11 EV Charging Points of the Plan states that for residential development “A minimum of 1 EV Charge Point space per five car parking spaces (ducting for every parking space shall be provided)”, the proposal provides 23 EV charging spaces. I do not consider this shortfall to be a material contravention of the plan as this shortfall can be addressed by way of suitable planning condition. Therefore, in the event the Commission were minded to grant permission, I recommend the inclusion of this condition.
- 9.4.47. With respect to bicycle parking to serve the overall scheme, the proposed also caters for an ample provision of bicycle parking providing 659 no spaces, which exceeds the Development Plan requirement i.e. a minimum of 560 no. spaces for the proposed scheme i.e. Table DM 9(a): Car and Bicycle Parking Standards Limerick City and Suburbs (in Limerick) Mungret and Annacotty of the Plan presents the required minimum spaces required per resident unit for dwellings and apartments. Bicycle parking is also proposed at the entrance to facilitate the proposed creche. I also note the provision of pedestrian and cyclist routes and infrastructure throughout the development.
- 9.4.48. I reference the planners report, however, which notes that *“given the accessible nature of the site and the need to support modal shift, a number of the visitor bicycle parking locations should be upgraded to provide covered stands rather than uncovered Sheffield-type racks. The two standalone bike stores located at the*

northern end of the site are considered acceptable, but internal bicycle stores serving the apartments must comply with the dimensional requirements of the Cycle Design Manual, including adequate circulation space and provision for larger or cargo bicycles”, Condition 12 (d) of the Planning Authority grant of permission relates. Given the accessible location of the site and having regard to the requirements of the Cycle Design Manual, in the event the Commission were minded to grant permission, I recommend the inclusion of this condition.

- 9.4.49. The planners report references the report received from the Active Travel and Strategy Section which considers a number of design interventions are required to ensure that the development properly supports active travel. The Active Travel Team notes that additional pedestrian crossings are required to improve permeability between Caisleán Na hAbhann, the internal layout of the proposed development, and Groody Road, particularly in relation to links with bus stop infrastructure and the existing cycle lane. I note that the existing bus stop is immediately due south of the proposed pedestrian crossing on the opposite side of the Groody Road. There is an existing footpath providing direct access to the existing bus stop on the Groody Road from the site. Moreover, it notes that there is an opportunity to extend the existing Groody Road cycle lane around the corner to meet the new entrance at Caisleán Na hAbhann, as the existing cycle lane currently terminates at that junction. The applicant is advised to liaise with the Transport & Strategy to ensure that the proposed pedestrian crossing does not conflict with the planned bus stop upgrades and high-frequency bus corridor under Bus Connects. I note that Condition 12 (d) relates. In the event the Commission were minded to grant permission, I recommend the inclusion of this condition to encourage sustainable travel modes and improve safety for cyclists.

DMURS Compliance:

- 9.4.50. The Design Statement references Compliance with DMURS, 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.

- 9.4.51. The planners report acknowledges that the site layout and proposed vehicular and pedestrian routes throughout the site align with desire lines and support active travel, which is consistent with DMURS.
- 9.4.52. Reference is made in third party appeals to Objective HO O3 of the Development Plan in respect to the emphasises on safety, appropriate street hierarchy and the protection of existing residential amenity.
- 9.4.53. 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. Caisleán na hAbhann, and the adjoining Groody Road. The proposal also creates homezones creating a sense of place with connections to the existing Caisleán na hAbhann 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:

- 9.4.54. I am satisfied that the proposed road layout and access points are acceptable. 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. Design Strategy

- 9.5.1. The Design Statement outlines the main design characteristics stating that the impact of the site constraints on the actual developable site area is significant, including difficult topography, with a level difference across the site from east to west of approximately 4metres. Therefore, the scheme has been designed so that the buildings and 2 spine roads follow the contour lines as closely as possible. The layout has also been designed to provide for pedestrian links through the proposed development to the existing public footpath on the Groody Road.

- 9.5.2. In terms of distinctiveness, the design includes a number of housing typologies which respond to the gradients across the site including houses, apartments and student accommodation.
- 9.5.3. There is also a mix of landscaping elements, with the proposed residential units designed to overlook the open spaces.
- 9.5.4. The application includes D-Visualizations-CGIs of the proposed development as viewed within the site and 3D Visualizations-Photomontage-Before-After, which depict the proposed development as viewed from the adjoining Groody Road and Caisleán na hAbhann. I also note as part of the first party appeal response, the applicant provided photomontages of the site as viewed from within Caisleán na hAbhann looking towards the appeal site. I am satisfied that the applicant has adequately demonstrated the proposed development relative to its surroundings.
- 9.5.5. In respect to the design strategy, I welcome the use of different housing typologies, each with a unique design and unit mix which provides variety and distinctiveness within the scheme. I acknowledge the site constraints, with respect to site levels in particular, and I consider that the current proposal responds to the constraints with an appropriate design approach. With respect to the proposed accessible stair and ramp structures, I acknowledge that these are design responses to the site level constraints on the appeal site and I consider these to be acceptable.

Conclusion:

- 9.5.6. While I acknowledge that the greenfield site will change in form, however the site is zoned for residential development, and I consider that the proposed development in terms of the proposed unit typologies, form, height and scale will integrate successfully into the existing area, will provide an attractive scheme at this location and, therefore will not impact on the character or visual amenity of the existing area in particular at Caisleán na hAbhann.

9.6. Residential Amenity and Residential Standards

- 9.6.1. The Planning Authority raised no issues of concern in relation to impact from the development on existing residential amenity. Noting the concerns raised by third parties, I will assess overlooking, overshadowing, overbearing, privacy and sunlight/daylight in the following sections.

9.6.2. I will also assess student accommodation and student management in this section.

Impact on existing residential amenity:

9.6.3. The proposed site plan indicated the proposed separation distances between the proposed development and the houses on adjoining lands, to the east in particular. Due to the size and shape of the site, separation distances from the proposed development and the directly adjoining site boundaries vary between 6.6metres to 33 metres throughout the site. Concerns have been raised in respect to overlooking from the proposed development in particular from the proposed apartment blocks and the directly adjoining dwellings at Caisleán na hAbhann to the east.

9.6.4. The proposed development aligns with the front and side of the dwellings at Caisleán na hAbhann, specifically Nos. 40, 41 and 121 (addresses side elevation) and Nos. 112 – 188 (addressed front elevation). I also note that separation distances of some 26 metres are proposed. I note that Section 11.4.2 Residential Quality Standards – Houses and 11.4.2.1 Separation Distances between Residential Units of the Plan state that *“An appropriate separation distance between directly opposing rear windows at first floor level in the case of detached, semi-detached and terraced units; Any residential development proposal exceeding three or more storeys shall demonstrate adequate separation distances having regard to occupier’s amenity including privacy, sunlight and daylight. Each development proposal will be assessed on a case-by-case basis and should not be seen as a precedent for future development in the area; Minimum 3m separation distance to the side of dwellings for the full length of detached, semi-detached or end of terrace dwellings, equally divided between the two adjacent dwellings”*. Therefore, I am satisfied that the proposed apartment blocks will not result in undue overlooking of the adjoining dwellings to the east within Caisleán na hAbhann.

9.6.5. I do note however, that the proposed development runs parallel to the rear of the existing dwellings within Caisleán na hAbhann, namely Nos. 231 - 229, with proposed stated separation distance of 33.7 metres from the side elevation of the proposed student block 3 and the adjoining dwelling units.

9.6.6. To the north of the site the proposed student blocks 2 and 3 address the car parking area and the existing student apartment blocks (Brookfield Hall), with proposed separation distances of 31 – 34.4 metres.

- 9.6.7. To the west the site addresses the Groody Road and to the south the proposed apartment block addresses the roundabout and Caisleán na hAbhann road.
- 9.6.8. 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 also 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.
- 9.6.9. Concerns have also been raised specifically in respect to the proposed accessible stair and ramp structures which is argued would impact on residential amenity. Given the site levels, the proposed accessible stair and ramp structures are required to provide appropriate access within the site. Given the aforementioned separation distances to the adjoining residential development at Caisleán na hAbhann, I do not envisage that the proposed accessible stair and ramp structures would result in a negative impact on residential amenity. Moreover, given the design and overall use associated with the proposed ramp and stair structure, I do not consider that this will appear overbearing as viewed from the adjoining site.

Sunlight/Daylight:

- 9.6.10. Overshadowing and loss of daylight and sunlight has been expressed as a concern by third parties.
- 9.6.11. The Development Plan in Section 11.2.1 Design Criteria states that “*Levels of privacy and amenity, including consideration of overlooking, sunlight/ daylight standards*”. 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.

9.6.12. 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.

9.6.13. 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 Caisleán na hAbhann) to the east of the site, from the adjoining student development (Brookfield Hall) to the north and Groody Road to the west. 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, Block 1 Brookfield Hall.
- Location B, Block 2 Brookfield Hall.
- Location C through No.231 Caisleán na hAbhann
- Location D through No.183 Caisleán na hAbhann
- Location E through No.178 Caisleán na hAbhann:
- Location F through No.120 Caisleán na hAbhann
- Location G through No.113 Caisleán na hAbhann

9.6.14. 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).

9.6.15. 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. The report concluded that in both Brookfield Hall and Caisleán na hAbhann, that all windows assessed exceed the

target values set out for annual and winter probable sunlight hours, any potential loss of sunlight will be negligible. Based on the BRE BR209:2022 assessment, the proposed development causes no additional overshadowing to neighboring properties or amenity spaces. The proposed development, therefore, meets the recommendations for sunlight in the BRE guidelines BR209:2022.

9.6.16. Having regard to the submitted Daylight and Sunlight Assessment, including the shadow study, I am satisfied that the proposed development has been appropriately designed and sited to minimise overshadowing of adjoining properties and amenity areas. The assessment demonstrates that any additional shadowing is largely confined to limited periods of the day and year, reflects the movement of the sun, and is consistent with that expected within an urban residential context. The analysis concludes that impacts on neighbouring residential properties and outdoor amenity spaces are negligible to minor and remain within the recommendations of BRE BR209:2022. While some localised increases in shadowing will inevitably occur, these do not give rise to an unacceptable loss of residential amenity.

9.6.17. Overall, I am satisfied that the proposal achieves an appropriate balance between increased residential density and the protection of neighbouring amenity.

Sunlight/Daylight – Within the Scheme

9.6.18. The analysis indicates the proposed development would comply with BRE Guidelines BR209:2022 and BS EN 17037 standards for sunlight and daylight provisions. 100% of the Living, Dining, Kitchen and Bedroom spaces achieve the target values set out in BS EN 17037:2018+A1:2021 section NA1, for daylight provision. This scheme is well designed for sunlight, with 87.3% of units meeting the minimum recommended 1.5 direct sunlight hours. This is in line with the BRE guideline example for an apartment layout where 4 in 5 achieves the target sunlight hours.

9.6.19. In respect of the proposed public and communal amenity areas, all the public and communal amenity spaces are well oriented for sunlight. All achieve 2 hours sunlight on the 21st March over in excess of 50% of the area. The proposed development meets the recommendations for sunlight in the BRE guidelines BR209:2022.

9.6.20. Overall, I am satisfied that the development would provide adequate sunlight and daylight for both private and communal spaces within the scheme.

Floor Areas:

- 9.6.21. I reference Section 12.6.7 Residential Standards, Chapter 12 Implementation and Monitoring of the CDP, which states that for Housing that “*All houses must comply with or exceed the minimum floor area standards contained in the Quality Housing for Sustainable Communities Guidelines, DEHLG (2007), or as may be superseded, as shown in the table 12.20*”.
- 9.6.22. The applicant’s Housing Quality Assessment demonstrates compliance with section 3.8 of the “Sustainable Urban Housing Design Standards for New Apartments – Guidelines for Planning Authorities (2023)”, with all apartment units exceeding the minimum requirements.
- 9.6.23. The submitted HQA provides an overview of all units proposed against the required standards which should be met. Overall, the minimum standards have been met or in some circumstances exceeded.

Housing Quality:

- 9.6.24. In terms of the quality of accommodation on offer, I have assessed the plans and particulars submitted in support of the application including the Housing Quality Assessment and I am satisfied on the basis of the information provided that all residential units meet or exceed the relevant minimum requirements in terms of unit size, floor area, ceiling height and internal storage. I note that all proposed units are either dual or triple aspect and that suitable arrangements have been made within the scheme for bike and bin storage. I further note that the proposed scheme, if permitted, would be subject to an Operational Waste Management Plan.

Student Accommodation and Student Management:

- 9.6.25. The purpose of the proposed 309 bedspaces is to provide for temporary accommodation during the academic year. As such the studios are not required to meet the same standards in an apartment scheme which would be occupied on a permanent basis. This proposed development of student accommodation is not bound by the requirements of the Apartment Guidelines, and therefore issues of room sizes, amenity spaces and orientation etc. do not apply. Notwithstanding, I note that Objective HO O8 Student Accommodation and Section 11.4.4.7 Student Accommodation of the Limerick Development Plan, which states that provision of on-

site facilities, including storage facilities, waste management, quality and quantum of cycle parking and associated showers and lockers, leisure facilities, car parking and amenity areas shall be provided.

9.6.26. The student blocks are positioned immediately adjoining the existing Brookfield Hall student accommodation to the north portion of the site. In terms of design and layout, I note that the PBSA is provided in the form of seven- and eight-bed clusters, with shared kitchen/living spaces, communal facilities at ground floor level, secure bicycle parking, and on-site management space. The development has been designed in excess of the minimum floor area standards for student accommodation and provides appropriate ancillary facilities including laundry, common rooms and refuse storage.

9.6.27. I consider the floor areas and associated cluster facilities to be acceptable. Ancillary facilities are also provided in Block 1, at ground floor level, which incorporates a communal space, meeting room, laundry room, office and reception with a total overall floor area of 232 sq.m. I am satisfied that the floor plan drawings accurately depict the stated size of the internal amenity areas.

Short-term Letting

9.6.28. Condition 7 of the planning authority grant of permission permits the permits tourist/visitor accommodation within the PBSA during academic holiday periods.

9.6.29. Concerns have been raised in the appeals regarding the short-term letting of the units outside of the academic year, which is considered a material change in the operational character of the development when compared with the term-time student occupation. The characterises associated with short-term letting have direct implications for residential amenity. It is further considered by the appellants that this has not been fully considered by the planning authority in their assessment and as such, it has not concluded that the short-term use would operate in a manner consistent with the protection of residential amenity.

9.6.30. I note that the proposed development description included permission to allow the student accommodation to be used for short-term letting or tourist accommodation outside of the academic year.

9.6.31. I reference the Design Guide for State Sponsored Student Accommodation (2025), which highlights the definition of student accommodation and its associated purpose under both the Residential Tenancies Acts and the Planning and Development Act 2024, and the New Planning and Development Act 2024, noting that the “*guidelines set out in this Design Guide primarily reflect the use of student accommodation by students during term time, however, as per above, summer lettings to tourists etc. will form part of the overall financial model for student accommodation depending on their location. The design implication of this has been considered in the development of these guidelines to enable operators to capitalise on this income stream during the summer period. Certain layouts therefore feature, in part, to reflect the requirements for use of student accommodation as summer lettings where applicable, including that of the double bed en-suite study bedroom*”.

9.6.32. This type of short term use is therefore supported by the government. I also note that ‘open for consideration’ uses on new residential land in the Development Plan includes relatively relevant uses such as ‘bed and breakfast’, ‘guesthouse’, and ‘tourism facility’. Therefore, given government support for these short-term non-student accommodation uses and the type of uses that are open for consideration on this zoning in the Plan, I also consider this type of ancillary accommodation to be acceptable within the PBSA during academic holiday periods. In the event the Commission be minded to grant permission, I recommend the inclusion of a condition with respect to the short-term let of the PBSA units.

9.6.33. The proposed use of student accommodation for temporary summer tourism aligns with planning policy by maximising land efficiency during low student demand. Given robust on-site management and the location's proximity to public transport, I am satisfied that this seasonal usage would not negatively impact surrounding residential amenities.

Anti-social behaviour

9.6.34. I note the concerns expressed regarding anti-social behaviour associated with the users of the facility. However, I am also satisfied that adequate consideration has been given to designing the proposed scheme, with passive surveillance to the communal and public open spaces which will deter anti-social behaviour.

Notwithstanding, issues in relation to antisocial behaviour are not a matter for An Coimisiún Pleanála.

Noise:

- 9.6.35. Noise has been raised as a concern in the third party appeals and the potential disturbance to adjoining residents from the proposed student development, in particular. 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, including the student accommodation and temporary short-term let use would detract from the adjoining residential development in terms of noise or disturbance.

Conclusion:

- 9.6.36. 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 east of the site.

9.7. Ecology

Bats:

- 9.7.1. Concerns have been raised in third party observations in respect to the assessment on the potential impact of the proposed development on bats.
- 9.7.2. The applicant submitted a Bat Fauna Survey, a lighting strategy and a Derogation Licence. I note that the survey confirms A Lesser Noctule (*Nyctalus leisleri*) roost was noted in the centre treeline on site, with two Lesser Noctule bats emerging from the roost. Bat activity found within the site is as follows; A Soprano Pipistrelle (*Pipistrellus pygmaeus*) and one Common Pipistrelle were noted foraging in the centre of the site. The scheme will result in changes to the local environment through the removal of trees and hedgerows. All hedgerows and treelines, with the exception of those located along the main road to the east and south-east of the site, are to be felled, to facilitate the layout.
- 9.7.3. One confirmed bat roost will be lost as a result of the proposed development. However, a derogation has been granted by NPWS permitting its removal subject to

strict supervision by a qualified bat ecologist and adherence to established felling protocols, including the installation of bat boxes suitable for Leisler's bats.

- 9.7.4. The planners report references the report received from the Council' Heritage Officer, which advises that given the presence of a Lesser Noctule roost, additional Noctule-appropriate boxes should also be provided, I note that Condition 13 of the planning authority grant of permission relates.
- 9.7.5. The applicant has also included bat-sensitive lighting strategy, including warm-white lighting ($\leq 3000\text{K}$), full cut-off fittings and measures to avoid spill-light onto hedgerows and treelines.
- 9.7.6. Having regard to the bat survey, I am satisfied that the proposed development will have no significant long-term impact on the foraging behaviors or stability of local bat populations, as it is anticipated that bats will continue to use the site in the longer term as newly planted trees and proposed landscaping establish and mature. Moreover, due to the site's limited use by a small number of common species, combined with the implementation of the specified lighting controls, the project will not cause significant long-term disruption to local bat foraging behaviours during either the construction or operational phases. Baseline ecological data indicates that the site is utilized exclusively by a small number of common bat species, and overall activity levels remain consistently low. Consequently, the potential for collision risk or the disruption of established flight paths is deemed negligible, as the proposed structures will be highly visible to bats navigating the area.
- 9.7.7. To safeguard the existing habitat, a comprehensive lighting mitigation strategy will be implemented during both the construction and operational phases to prevent adverse displacement. The bat survey report notes while a temporary reduction in bat foraging activity is anticipated post-construction, onsite foraging is expected to persist and will steadily recover as the proposed landscaping scheme matures over time. Therefore, the residual impact is considered to be moderate adverse/not significant in the short term to minor adverse /not significant in the long term.
- 9.7.8. 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 Survey.

Groody Valley Green Wedge

- 9.7.9. The third parties’ express concerns in respect to the encroachment of the development on the Groody Valley Green Wedge and that the proposed development is contrary to Green Wedge and Green Infrastructure policies of the Development Plan, and the National Biodiversity Plan, 2023-2030.
- 9.8. I note that the Groody Valley Green Wedge lies to the west of the appeal site, beyond Groody Road. I note the importance of the Groody Valley Green Wedge, functioning as an important natural buffer and contributing to the wider ecological and green infrastructure network of the area. The appeal site is separated from the Groody Valley Green Wedge by the Groody Road, therefore there is a physical buffer between the appeal site and the Groody Valley Green Wedge. I also note that the proposed development is set back from the western site boundary, with the closest pinch point of 6.47 metres at the proposed student block 1. Therefore, I do not consider that the proposed development would impact negatively on the Groody Valley Green Wedge nor would conflict with any Green Infrastructure policies of the Development Plan, and the National Biodiversity Plan, 2023-2030. I also reference Objective GV O1 Groody Valley of the Development Plan, which states that it is an objective of the Council to “*facilitate purpose-built student accommodation where deemed appropriate*”. the AA screening and EIA Screening Report and Ecological Impact Assessment submitted with the application, as referenced in the forgoing assessment.

9.9. **Planning Authority Conditions**

- 9.9.1. As noted in Section 5.1 above Limerick County Council granted permission subject to 21 conditions, some of which have been referenced above. I note that the remainder of the conditions are briefly summarised in the following table and I also indicate whether I have included or incorporated them in my recommended conditions in section 14. Some conditions, while indicated as being included in the recommended conditions, may have been reworded for clarity, brevity, or other reasons, but are essentially consistent with the LCC condition.

Table 9.9 – LCC Conditions

Cond. No.	Summary	Included or Excluded in Recommended
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		Conditions/Reference in assessment, where relevant
1.	Development as per plans and particulars	Included as standard condition 1
2.	Development Contribution	Included as standard condition 30
3.	Social and Affordable Housing	Included as standard condition 28
4.	First Occupation by Individual Purchasers	Included as standard condition 6
5.	Developers Bond	Included as standard condition 29
6.	Taking in Charge Protocol	Included as standard condition 25
7.	Purpose Built Student Accommodation Scheme (PBSA) Use – permitting the student use outside the academic holiday period.	Included as Condition 3
8.	Student Management - a finalised Student Accommodation Management Plan	Included as Condition 7
9.	Road Safety Audit	Included as standard Condition 16
10.	Public Lighting	Included as standard Condition 12
11.	Sustainable Urban Drainage (SuDS) – including specific surface water drainage layout drawings and design calculations and supporting documentation for written	Included as standard Condition 14

	agreement of planning authority.	
12.	Roads, Access, Footpaths, Parking & Mobility – including specific requirements regarding footpaths, pedestrian crossings, EV charging cables, and bicycle parking requirements.	Included as Condition 18 – referenced in section 9.4.46 of my assessment in respect to EV charging and section 9.4.47 with respect to bicycle parking requirements.
13.	Ecology – including requirements with respect to bats and birds (i.e. nesting boxes).	Included as Condition 17 – referenced in section 9.7 of my assessment.
14.	Archaeology	Included as Conditions 26 and 27 – referenced in sections 9.10.22-9.10.24 of my assessment
15.	Construction Management and Delivery Plan - for the construction of the development	Included as Condition 21
16.	Construction Hours	Included as standard Condition 11
17.	Wheel washing facility	Not included as a stand alone condition. Included under Condition 20 – i.e. A Construction and Environmental Management Plan – site house keeping.
18.	Landscaping and Boundary Treatment	Included as Condition 10

19.	House and Apartment naming and numbering	Included as Condition 8
20.	Apartment Management Company	Included as Condition 25
21.	Active Travel & Mobility Management Plan	Included as Condition 19 (e)

9.9.2. I note that specific requirements from Fire & Building Control, and Uisce Éireann have been included in the Manager's Order as notes. I reference Condition 13 of the Commission grant of permission with respect to the requirements of Uisce Éireann.

9.10. **Other Matters**

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

Open Space and Recreation

- 9.10.1. The appellants argue that open space provision is inadequate in quality and usability. The concerns include fragmented open space, steep gradients, limited recreational usability, and inadequate child-friendly design, etc.
- 9.10.2. The planning authority raised no issue with respect to the quantum or quality of open space proposed.
- 9.10.3. Objective SCS1 O21 of the Development Plan states that it is an objective of the Council to *“Ensure residential development incorporates appropriate provision of quality public open space and play lots in accordance with the Development Management Standards set out in Chapter 11. Open space provision will be proportional to the number of residential units proposed, consider access to existing open space and have regard to the principles of national guidance including accessibility, personal and child safety, linkage, place-making and permeability and the hierarchy of open space”*.
- 9.10.4. Section 11.3.6 of the Plan states *“In accordance with the 2009 Sustainable Residential Guidelines and any subsequent guidelines, at a minimum, 15% of the gross greenfield sites should be provided as multi functional open space in new*

residential developments easily accessible to all, encouraging active and passive use for persons of all abilities regardless of mobility and/or age”.

- 9.10.5. Section 11.4.4.7 Student Accommodation of the Plan states “*The provision of on-site facilities, including storage facilities, waste management, quality and quantum of cycle parking and associated showers and lockers, leisure facilities, car parking and amenity areas*”.
- 9.10.6. Section 11.2.1 Design Criteria of the Plan states that consideration will be taken of “*Quality of proposed public, private and communal open spaces and recreational facilities*”, when assessing planning applications.
- 9.10.7. In respect to open space the proposed development provides for 0.48 (15%) of the site area for public open space, with 0.29 ha of incidental open space also provided as part of the scheme. A substantial linear green space is located along the western boundary, connecting the northern and southern open spaces. To the north, public open space is arranged around the duplex blocks including a student courtyard including communal amenity space for both the apartments and the student accommodation, with an area of 3,200 sq. m., respectively. This is acceptable and accords with the requirements of the Plan as noted above.
- 9.10.8. A high level of landscaping is also proposed to the open spaces. The landscape areas form part of walkways pedestrian paths link the open space to the public road. The different building forms, surrounding and overlooking the open space areas, create character and a sense of place and provide passive surveillance.
- 9.10.9. The Landscape Masterplan identifies a formal equipped playground in the southern area, enclosed with a 1.2m railing and featuring natural timber play units, swings, climbing frames and safety surfacing.
- 9.10.10. In accordance with the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024), and the Development Plan, as noted above the development provides approximately 15% public open space.
- 9.10.11. I am satisfied that the public open space network includes a range of functional and recreational spaces such as a central student courtyard, a linear exercise route, naturalistic play areas and formal equipped playgrounds and is

appropriately designed providing a structured open space framework across the site, as illustrated in the Landscape Masterplan.

9.10.12. I note that supplemental sustainable drainage (SUDs) features, including bioswale planting, are also integrated into the landscape to assist with water management and ecological enhancement. The internal report received from the Roads Department recommended that a Surface Water & SuDs Management Plan be submitted by way of further information, however Condition 11 of the planning authority final grant of permission relates. In the event the Commission be minded to grant permission, I recommend the inclusion of a similar condition.

9.10.13. Overall, I am satisfied development strategy put forward for the proposed development in terms of design, responding to the site topography, public and communal open space provision is acceptable and will provide for an attractive residential scheme at this location. If the Commission were minded to grant permission, I recommend the inclusion of a condition in respect to final details pertaining to play.

Flooding

9.10.14. In this regard, I reference the report received from the OPW, which notes that *“The site falls within the area deemed to benefit from drainage by Channel No.C1 of the Groody Scheme and as a result may be subject to an increased flood risk. The Planning Authority should satisfy themselves that due consideration is given to flood risk at this site”*.

9.10.15. No watercourses traverse the site or flow directly adjacent to the site. The appeal land benefits from arterial drainage. The Groody River flows approximately 1km at its closest point to the west of the site. The site is located on Flood Zone C lands, and therefore a flood risk assessment is not required.

9.10.16. I note that Limerick County Council raised no issues of concern regarding flooding. I am satisfied that the applicant has provided adequate information in relation to water supply and drainage. From the available information I am satisfied that the proposed development will not be impacted by flooding and will not give rise to flooding of adjoining lands.

Landscaping, Removal of Trees/Hedge

- 9.10.17. Reference is made in the third party observations to the removal of laurel hedge on the land that borders and interfaces Caislean na hAbhann and that the trees at the site of No. 231 Caislean na hAbhann should not be harmed.
- 9.10.18. I acknowledge that the existing site presently is overgrown with trees, hedgerow and long grass and in order to facilitate the proposed development the removal of trees and vegetation on site is essential.
- 9.10.19. The proposed development features a coordinated landscaping framework that prioritises the retention of moderate-quality, early-mature hornbeam trees along the eastern and western perimeters to safeguard existing green corridors. Internal clearance is acceptably limited to 128 linear metres of low-quality, Category C hawthorn hedgerows and scrub to accommodate the site layout. To offset this removal, the strategy introduces 513 new native trees and 142 linear metres of native hedgerow, yielding a net habitat gain.
- 9.10.20. Perimeter interfaces with the Caislean Na nAbhann estate, Groody Road, and eastern adjoining lands are treated in accordance with the masterplan, ensuring a clear demarcation between public and private realms. I am satisfied that the scheme successfully complies with the environmental and habitat protection policies set out under Objective EH O10 of the Limerick Development Plan.
- 9.10.21. Any issue relating to the planting at 231 Caislean na hAbhann is 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.

Archaeology

- 9.10.22. An Archaeological Impact Assessment, including a programme of licensed test trenching, was undertaken across the development site in order to determine the presence or absence of sub-surface archaeological material.
- 9.10.23. The report from the Councils Archaeologist considered that given the archaeological richness of the surrounding landscape and the potential for deeply buried or isolated features, appropriate safeguarding is required and as such recommended the inclusion of specific conditions, Condition 14 of the location authority grant of permission relates.

9.10.24. While I note that no report was received from the Department of Housing, Local Government and Heritage, given the potential for any surviving archaeological remains/features to be impacted upon, and in the event the Commission be minded to grant permission I recommend that this be addressed by way of appropriate condition.

Phasing

9.10.25. Section 11.2.3 of the Development Plan notes that “*A phasing schedule for any residential development exceeding 30 units, shall be submitted with a planning application*”.

9.10.26. The applicant submitted a phasing plan for the proposed development consisting of:

- Phase 1 – southern portion of the site – 51 units.
- Phase 2 – central portion of the site – 66 units and creche.
- Phase 3 – student accommodation.

9.10.27. The construction period for the development is expected to last four years, this would not be a considerable period of time for a project of this scale, at this location.

9.10.28. Having regard to the Phasing Plan, I note that the plan identifies the delivery of the creche in phase 02, I am satisfied that given the location of the creche within the overall scheme that the delivery of the creche in phase 02 of the phasing plan would be acceptable.

9.10.29. I am satisfied that the proposed phasing generally accords with the Development Plan and if the Coimisiún were minded to grant permission a condition could be attached to ensure agreement on the final phasing programme and/or to ensure the delivery of the proposed creche in tandem with a specific phase of development.

Legal and Procedural Issues

9.10.30. The observers reference alleged deficiencies in the LRD Consultation Process and argues that local residents were not consulted and therefore the process is incomplete.

9.10.31. I am satisfied that consultation has been carried out in accordance with the legislation.

10.0 Water Framework Directive (WDF)

10.1. Introduction:

10.1.1. I note that the applicant submitted a Water Framework Directive Assessment as part of the planning application and I have had regard to same.

10.1.2. 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). This waterbody has a moderate WFD status.

10.1.3. 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. This groundwater body has a good WFD status.

10.1.4. The proposed development comprises of the construction of 95 apartments, 22 houses and a Purpose-Built Student Accommodation (PBSA) scheme comprising 309 student bedspaces. The development also includes provision of a creche and all associated site works at Groody Road & Caisleán Na hAbhann, Kilbane Castletroy, Co. Limerick. I note that the proposed development does not include the provision of a basement.

10.1.5. I have assessed the residential development at Groody Road & Caisleán Na hAbhann, Kilbane 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.

10.1.6. 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

10.1.7. 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 nature and scale of the proposed development which includes a residential development comprising 95 apartments, 22 houses and a Purpose-Built Student Accommodation (PBSA) scheme with 309 no. student bedspaces.
- 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 Environmental Impact Assessment Screening Report (Prepared by HRA Planning – Dated January 2026), and I will have regard to same. The submitted

report concludes *“Having regard to the nature and scale of the proposed development which is below the thresholds set out in Class 10 of Part 2 of Schedule 5, the criteria in Schedule 7, the information provided in accordance with Schedule 7A of the Planning and Development Regulations 2001, as amended, and the following:*

- *The scale, nature and location of the proposed development*
 - *The potential impacts and proposed mitigation measures; and*
 - *The results of the any other relevant assessments of the effects on the environment*
- It is considered that the proposed development would not be likely to have significant effects on the environment and it is concluded that an environmental impact assessment report 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, an Ecological Impact Assessment has been submitted (prepared by Pádraic Fogarty of OPENFIELD Ecological Services). The report notes that the subject lands comprise unmanaged dry meadow, scrub, hedgerows and treeline, with the traditional hedgerows identified as being of higher local biodiversity value. No wetlands, watercourses or invasive alien species were recorded within the site.
- 12.4. The site lies within the wider catchment of the River Shannon and within the zone of influence of the Lower River Shannon SAC and the River Shannon and River Fergus Estuaries SPA. However, the lands are separated from the River Groody by a public road and there are no direct hydrological pathways connecting the site to these designated areas. Accordingly, no significant effects on European sites are predicted.
- 12.5. Ecological surveys identified a confirmed Lesser Noctule bat roost within a treeline on the site, together with foraging activity by Common and Soprano Pipistrelles. The removal of the roost tree will require a derogation licence from the NPWS. Breeding bird surveys recorded only common countryside species of low conservation

concern, while no evidence of badgers, otters or other protected mammals was identified.

- 12.6. The principal impacts identified relate to the loss of semi-natural habitat, potential disturbance to nesting birds and bats during site clearance, and the effects of artificial lighting. In the absence of mitigation, these impacts range from moderate to major adverse at a local level.
- 12.7. Mitigation measures include ecological supervision of vegetation clearance works, compliance with the proposed bat derogation licence, provision of bat and bird boxes, enhanced native planting and biodiversity-friendly landscaping, together with a bat-sensitive lighting strategy designed to minimise light spill and retain dark corridors.
- 12.8. Having regard to the absence of direct hydrological connectivity, the proposed SuDS and wastewater measures, and the ecological mitigation strategy, it is concluded that the development would not result in significant long-term adverse impacts on biodiversity, nor would it adversely affect the integrity of any Natura 2000 site, either individually or cumulatively with other permitted developments in the area.
- 12.9. 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.
- 12.10. 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.
- 12.11. I note that the Planning Authority in their Screening determination considered;
- “The applicant has submitted an EIA screening report in support of the application. The report has identified that the proposal is subthreshold and has included a preliminary examination. The report concludes that there is no real likelihood of*

significant effects on the environment and therefore EIA is not required. An EIA screening has been undertaken (See Appendix 2). Having regard to the number of residential units proposed and to Schedule 5 Part 2, 10(b)(i) of the Planning and Development Regulations (2001) it is considered that the proposal is subthreshold. A preliminary examination has been undertaken that has examined the nature, scale and location of the development. It has been concluded that there is no real likelihood of significant effects on the environment and EIA is not required”.

12.12. 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:

12.13. 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, Ecological Impact Assessment. Bat Repot and Bat Derogation licence, 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.

12.14. A Screening Determination was carried out within the required timeframe – as noted in Appendix C of this Report (Form 3).

13.0 Conclusion

- 13.1. The application is for the construction of 95 apartments, 22 houses and a Purpose-Built Student Accommodation (PBSA) scheme comprising 309 student bedspaces. The development also includes provision of a creche and all associated site works at Groody Road & Caisleán Na hAbhann, Kilbane Castletroy, Co. Limerick. Two (2 no.) two party appeals and three (3 no.) observations 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 student accommodation addresses an identified shortfall in student bedspaces in Limerick and has been designed to an appropriate standard with a clear management framework in place.
- 13.3. The proposal also 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 26th March 2026, subject to 21 no. conditions.
- 13.4. 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 am satisfied that the proposed access arrangements are acceptable and will not impact on the existing Caisleán na hAbhann with respect to amenity and traffic safety.

- 13.5. 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, the Sustainable Urban Housing: Design Standards for New Apartments, 2025, the National Student Accommodation Strategy issued by the Department of Education in July 2017, the Design Guide for State Sponsored Student Accommodation (Department of Further and Higher Education, Research, Innovation and Science, 2025), and the National Student Accommodation Strategy 2026-2035 (Department of Further and Higher Education, Research, Innovation and Science, 2026).
- 13.6. 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.
- 13.7. 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.
- 13.8. 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 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: 2660089

Appeal

Third Party Appeals by Caisleán na hAbhann Residents Association and Diarmuid Ryan against the decision made on the 26th day of March 2026, 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

- (i) **95 no.** apartments;
- (ii) **8 no.** 2.5 storey 3 bed semi-detached units;
- (iii) **22 no.** houses;
- (iv) Purpose-Built Student Accommodation (PBSA) scheme comprising **309 no.** student bedspaces;
- (v) Ancillary site development works including (i) car and bicycle parking; (ii) bicycle stands; (iii) 2 no. bicycle sheds; (iii) boundary treatments; (iv) public lighting; (v) water supply; foul and surface water drainage infrastructure; (vi) ESB substation; (vii) temporary construction access; and (viii) landscaping;
- (vi) A standalone creche building;
- (vii) Planning permission is also sought for use of the accommodation, outside of student term time, for short-term letting purposes.

The proposed development also includes vehicular and pedestrian access to the site will be from the Groody Road and Caisleán Na hAbhann, all hard and soft landscaping, boundary treatments, surface water and foul drainage connections to existing network and all associated site and development works at Groody Road and Caisleán Na hAbhann, Kilbane 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 Design Guide for State Sponsored Student Accommodation (Department of Further and Higher Education, Research, Innovation and Science, 2025),
- (xiii) the National Student Accommodation Strategy 2026-2035 (Department of Further and Higher Education, Research, Innovation and Science, 2026),
- (xiv) The availability in the area of a wide range of social and transport infrastructure, including the availability of public transport in close proximity to the site,
- (xv) To the proximity of the site to Limerick University,
- (xvi) To the pattern of existing and permitted development in the area,
- (xvii) Planning Report and supporting technical reports of Limerick City and County Council,
- (xviii) To the submissions and observations received,
- (xix) The grounds of appeal, observations and further responses on appeal,
- (xx) 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 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 as outlined in the plans and particulars, including Ecological Impact Assessment, Bat Survey, Bat Derogation License and Construction and Environmental Management Plan.

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 an satisfactory mix and quantum of residential development, would provide acceptable levels of residential amenity for future occupants, would address an identified shortfall in student bedspaces in Limerick, would not result in an overconcentration of student accommodation in the area, 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 Groody Road and Caisleán na hAbhann to the east of the site, 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.	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 30 th day of July 2026 except
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	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. Reason: in the interest of clarity.
2.	The 117 number residential units hereby permitted shall be used and occupied as a single unit for residential purposes and shall not be sub-divided or used for any commercial purpose (including short-term letting) without a separate planning permission. Reason: in the interest of clarity and to ensure the maintenance of a residential community.
3.	The 309 student bedspaces hereby permitted shall be used for student accommodation or accommodation related to a Higher Education Institute or tourist / visitor accommodation only during academic holiday periods and shall not be used for the purposes of permanent residential accommodation, as a hotel, hostel, apart-hotel or similar use, without a prior grant of permission. Reason: To clarify the scope of the permission, in the interest of the proper planning and sustainable development of the area, and in accordance with the details submitted with the planning application.
4.	Mitigation and monitoring measures outlined in the plans and particulars, including Ecological Impact Assessment, Bat Survey 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. Reason: In the interests of protecting the environment, public health and clarity.
5.	(a) The development shall be carried out on a phased basis, in accordance with a phasing scheme which shall be submitted to, and agreed in writing with, the planning authority prior to commencement of any development.

	(b) Prior to commencement of any development on the overall site, details of the first phase shall be submitted to, and agreed in writing with, the planning authority. Work on any subsequent phases shall not commence until such time as the written agreement of the planning authority is given to commence the next phase. Details of further phases shall be as agreed in writing with the planning authority. (c) Unless otherwise agreed in writing with the planning authority, the childcare facility shall be completed to an operational standard prior to the occupation of any of the 22 houses or 95 apartment units hereby permitted in Apartment Block A. Reason: To ensure the timely provision of services, for the benefit of the occupants of the proposed dwellings and that childcare facilities are provided in association with residential units.
6.	(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. (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. (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 agreement has been terminated and that the requirement of this planning condition has been discharged in respect of each specified housing unit. 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.
7.	The proposed development shall be implemented as follows: (a) The student accommodation and complex shall be operated and managed in accordance with the measures identified in a finalised Student Accommodation Management Plan which shall be submitted to, and agreed in writing with, the planning authority prior to first occupation of the development. The management scheme shall also include adequate measures for the future maintenance of open spaces, roads and communal areas. (b) Student Housing Units shall not be amalgamated or combined. Reason: In the interest of the amenities of occupier of the units and surrounding properties.
8.	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). Reason: In the interest of urban legibility and to ensure the use for new residential areas.
9.	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. Reason: In the interest of visual amenity.

10.	The proposed landscaping scheme including levelling, grading and grassing shall be carried out during the first planting season after the commencement of development. The species planted may include trees from the following list- Mountain ash, birch, cedar, willow, sycamore, larch, spruce, pine, oak, hawthorn, holly, hazel, beech alder (on no account shall Leylandii trees be planted). Any trees or plants which fail during the first 3 years after planting shall be replaced by the developer. Adequate drainage works to prevent flooding of these areas shall also be carried out. Reason: In the interest of orderly development and the visual amenities of the area.
11.	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 from these times will only be allowed in exceptional circumstances where prior written approval has been received from the planning authority. Reason: in order to safeguard the residential amenities of property in the vicinity.
12.	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). Reason: in the interests of amenity and public safety.
13.	Prior to the commencement of development, the developer shall enter into Connection Agreements with Uisce Eireann to provide for service connections to the public water supply and/or wastewater collection network. Reason: In the interest of public health and to ensure adequate water / wastewater facilities.
14.	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. Reason: In the interest of sustainable drainage.

15.	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. Reason: In the interests of visual and residential amenity.
16.	Prior to commencement of development, a Stage 2 Road Safety Audit, in compliance with the TII Publication 'Road Safety Audit GE-STY-01024', shall be submitted for the prior written approval of the Planning Authority. Upon completion of the development and prior to first occupation of any residential unit, a Stage 3 Road Safety Audit, in compliance with the TII Publication 'Road Safety Audit GE STY-01024' and including revised Site Layout Plan drawings shall be submitted for the prior written approval of the Planning Authority. Reason: In the interests of traffic, pedestrian and cyclist safety, and sustainable transport.
17.	The applicant shall comply with the requirements of the planning authority with respect to ecology as follows: (a) All ecological mitigation in the Bat Fauna Survey, EcIA, and Landscape Plan shall be implemented in full. (b) The removal of the Lesser Noctule bat roost tree shall be carried out strictly in accordance with the NPWS derogation licence, including seasonal restrictions, pre-felling inspections, and supervised removal. (c) A minimum of three Noctule bat boxes and three Leisler's bat boxes shall be installed under ecological supervision. (d) Swift bricks and at least 5 bird nesting boxes shall be integrated into the development at locations agreed with the Council. (e) A post-construction bat survey and light-spill assessment shall be submitted within 6 months of occupation. Reason: To mitigate loss of roost habitat, enhance biodiversity and ensure effective mitigation.
18.	The applicant shall comply with the requirements of the planning authority with respect to road, access, footpaths, parking and mobility as follows:

	(a) All internal footpaths shall provide a minimum 2.0m width, except where widened at perpendicular parking areas to ensure pedestrian clearance from vehicles. (b) Revised drawings addressing forward visibility, pedestrian crossings, tactile paving, cycle infrastructure, kerb details, and tie-in to existing roads, shall be submitted for written agreement with the Roads Department prior to commencement. (c) All residential car parking spaces shall be ducted for future EV charging, and at least 20% of all spaces shall be EV-enabled prior to occupation. (d) Bicycle parking shall comply with the Cycle Design Manual, and visitor cycle parking shall be covered wherever requested in the Active Travel submission. Reason: In the interest of traffic safety, to support sustainable travel and comply with Development Plan standards.
19.	The proposed development shall be implemented as follows: (a) Prior to commencement of development, a revised site layout drawing shall be submitted and agreed in writing with the Planning Authority which continues the existing Groody Road cycle lane to meet the new proposed vehicular entrance at Caisleán na hAbhann. (b) The internal bicycle stores serving the apartment blocks shall be revised to comply with the Cycle Design Manual, including adequate turning/manoeuvring space and the provision of cargo-bike-appropriate spaces. (c) Visitor bicycle parking shall include covered bicycle stands in a number of locations within the development. (d) A minimum of 32 no. EV parking spaces (20% of total car parking provision) shall be provided and distributed appropriately across the development prior to occupation. (e) A revised Mobility Management Plan shall be submitted for written agreement of the Planning Authority prior to occupation, including: updated modal share targets, identification of a Travel Plan

	Coordinator, provision of car-share targets, and commitments to baseline and ongoing monitoring surveys. Reason: In the interest of promoting sustainable transport and compliance with the provisions of the Limerick Development Plan.
20.	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. Reason: in the interest of environmental protection residential amenities, public health and safety and environmental protection.
21.	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. Reason: In the interest of sustainable transport and safety.
22.	(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. (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.

	Reason: In the interest of residential amenity, and to ensure the provision of adequate refuse storage for the proposed development.
23.	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. Reason: In the interest of proper planning and sustainable development.
24.	Roof areas shall not be accessible other than for maintenance purposes only. Reason: In the interest of residential amenity.
25.	(a) The communal open spaces, including hard and soft landscaping, car parking areas and access ways, communal refuse/bin storage, and all areas not intended to be taken in charge by the local authority, shall be maintained by a legally constituted management company. (b) The management and maintenance of the proposed development following its completion shall be the responsibility of a legally constituted management company (to include details of the proposed student accommodation complex, which shall be operated and managed by an on-site management team on a 24-hour, full-time basis), 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. Reason: To ensure the satisfactory completion and maintenance of this development.

26.	Prior to the commencement of development on site that applicant shall submit the following for the written agreement of the Planning Authority: (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. 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.
27.	Prior to the commencement of development on site that applicant shall submit the following for the written agreement of the Planning Authority: (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

	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. (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. 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.
28.	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

	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.
29.	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. Reason: To ensure the satisfactory completion and maintenance of the development until taken in charge.
30.	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. Reason: It is a requirement of the Planning and Development Act 2000, as amended, that a condition requiring a contribution in accordance with the

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

14th July 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 95 apartments, 22 houses and a Purpose-Built Student Accommodation (PBSA) scheme comprising 309 student bedspaces. The development also includes provision of a creche and all associated site works at Groody Road & Caisleán Na hAbhann, Kilbane Castletroy, Co. Limerick
Brief description of development site characteristics and potential impact mechanisms	The site is a 3.6-hectare greenfield site. 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 1.8km from the boundary of this area at their closest points (the River Shannon). There are no water courses, drainage ditches, bodies of open water or habitats which could be described as wetlands. There are no direct, surface hydrological pathways from the development site to the River Groody and so there are no direct pathways to the River Shannon/Lower River Shannon SAC.
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	1.8km to the north (approx..)	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	5km to the northwest (approx..)	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

I reference the AA Screening Report I note the following 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) Qualifying Interest:	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.

• 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] • <i>Lampetra planeri</i> (Brook Lamprey) [1096]	• 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.	Water Quality: There is a potential indirect pathway from the development site via surface and wastewater water flows to the River Groody and the Shannon Estuary respectively. The proposed new homes will increase the quantity of wastewater to be generated however there is sufficient capacity in the Bunlickey wastewater treatment plant. 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. Surface water will be separate from the foul sewer and so relieve pressure on the Bunlicky plant. <u>Habitat Loss:</u> 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 <u>Habitat Disturbance:</u> 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). No significant effects to Natura 2000 sites are likely to arise from habitat disturbance.
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• 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: • 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] • Scaup (Aythya marila) [A062]	Direct: None Indirect: • 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. The proposed new homes will increase the quantity of wastewater to be generated however there is sufficient capacity in the Bunlickey wastewater treatment plant.

• Ringed Plover (<i>Charadrius hiaticula</i>) [A137] • Golden Plover (<i>Pluvialis apricaria</i>) [A140] • Grey Plover (<i>Pluvialis squatarola</i>) [A141] • Lapwing (<i>Vanellus vanellus</i>) [A142] • Knot (<i>Calidris canutus</i>) [A143] • Dunlin (<i>Calidris alpina</i>) [A149] • Black-tailed Godwit (<i>Limosa limosa</i>) [A156] • Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157] • Curlew (<i>Numenius arquata</i>) [A160] • Redshank (<i>Tringa totanus</i>) [A162] • Greenshank (<i>Tringa nebularia</i>) [A164] • Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179] • Wigeon (<i>Mareca penelope</i>) [A855] • Shoveler (<i>Spatula clypeata</i>) [A857] • Wetland and Waterbirds [A999]	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. Surface water will be separate from the foul sewer and so relieve pressure on the Bunlicky plant. <u>Habitat Loss:</u> 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 <u>Habitat Disturbance:</u> 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). No significant effects to Natura 2000 sites are likely to arise from habitat disturbance.
	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.
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-324206-26		
Case Reference			
Proposed Development Summary	95 apartments, 22 houses and a Purpose-Built Student Accommodation (PBSA) scheme comprising 309 student bedspaces. The development also includes provision of a creche and all associated site works.		
Development Address	Groody Road & Caisleán Na hAbhann, Kilbane Castletroy, Co. Limerick		
1. Does the proposed development come within the definition of a ‘project’ for the purposes of EIA? (that is involving construction works, demolition, or interventions in the natural surroundings)		Yes	X
		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. Infrastructure projects: 10(b)(i) <i>Construction of more than 500 dwelling units;</i> 10 (b)(iv) <i>Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere.</i> * (In this paragraph, “business district” means a district within a city or town in which the predominant land use is retail or commercial use.)	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 117 residential units and 309 student bedspaces (total 426 units).	Preliminary examination required (Form 2)

5. Has Schedule 7A information been submitted?		
No		
Yes	X	Environmental Impact Assessment Screening Report Submitted EIAR Form 3 - completed

Inspector: _____

Date: 14th July 2026

Appendix C – Form 3 – EIA Screening Determination

A. CASE DETAILS			
An Coimisiún Pleanála Case Reference	ACP-324206-26		
Development Summary	The construction of 95 apartments, 22 houses and a Purpose-Built Student Accommodation (PBSA) scheme comprising 309 student bedspaces. The development also includes provision of a creche and all 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	An Environmental Impact Assessment Screening Report 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, and student accommodation with creche and is located in a primarily residential area in the eastern suburbs of Limerick city adjacent to an existing student accommodation which extends to 4-storey in height.	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, including PBSA, 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

1.5 Will the project produce solid waste, release pollutants or any hazardous / toxic / noxious substances?	Yes	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.	No
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?	No	No significant risks are identified.	No
1.7 Will the project cause noise and vibration or release of light, heat, energy or electromagnetic radiation?	Yes	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.	No
1.8 Will there be any risks to human health, for example due to water contamination or air pollution?	Yes	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.	No

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?	Yes	I note that permission was granted for c. 1,400 no. student bedspaces granted to the north west of the site adjoining the Dublin Road (Ref: P25/60113). I have considered the cumulative effect of the proposed development in conjunction with recently permitted student developments in the vicinity. I note that both developments require CEMP's and therefore, I am satisfied that no significant cumulative negative effects on the environment will arise.	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: • 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	No	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 1.8km from the site, and the River Shannon and River Fergus Estuaries SPA lies approximately 5km to the east of the site. Screening for Appropriate Assessment was provided in support of the application.	No

development plan/ LAP/ draft plan or variation of a plan		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 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?	Yes	No European sites located on or adjacent to the site. However, as per the Bat Fauna Survey a Lesser Noctule bat roost is located within a central treeline on the site. This tree must be removed to facilitate the layout. A Bat Derogation Licence has been granted by NPWS permitting its removal subject to strict supervision by a qualified bat ecologist and adherence to established felling protocols. The derogation requires the installation of bat boxes suitable for Leisler's bats. A condition has been attached to the grant of permission in this regard.	No
2.3 Are there any other features of landscape, historic, archaeological, or cultural importance that could be affected?	Yes	An Archaeological Impact Assessment, including a programme of licensed test trenching, was undertaken across the	No

		development site in order to determine the presence or absence of sub-surface archaeological material. There were no archaeological features or artefacts identified during the excavation or in the examination of upcast material. Given the archaeological richness of the surrounding landscape and the potential for deeply buried or isolated features, appropriate safeguarding is required - a condition can be included to ensure sustainable development and the protection of the archaeological heritage.	
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. 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. No watercourses traverse the site or flow directly adjacent to the site. The appeal land benefits from arterial drainage. The Groody River flows approximately 1km at its closest point to the west of the site. The site is located on Flood Zone C lands, and	No

		therefore a flood risk assessment is not required. I am satisfied that the applicant has provided adequate information in relation to water supply and drainage. From the available information I am satisfied that the proposed development will not be impacted by flooding and will not give rise to flooding of adjoining lands.	
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	The site is essentially proposed to be split into two with access from the Groody Road and the existing Caisleán na hAbhann housing estate to the east. Adequate car parking is proposed to serve the development. I also note that the site is located on a public transport route with a bus stop on the Groody Road directly adjoining the site. A stage 1/2 Road Safety Audit and Traffic and Transportation Assessment have been submitted. 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	No

		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.	☒	EIAR Not Required			
Real likelihood of significant effects on the environment.	☐	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 be significant effects on the environment as outlined in the plans and particulars, including Ecological Impact Assessment, Bat Survey, Bat Derogation License and Construction and Environmental Management Plan.

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 14th July 2026

Approved (ADP) _____

Date 14th July 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-324206-26	Townland, address	Groody Road and Caisleán Na hAbhann, Kilbane, Castletroy, Co. Limerick
Description of project		The construction of 95 apartments, 22 houses and a Purpose-Built Student Accommodation (PBSA) scheme comprising 309 student bedspaces. The development also includes provision of a creche and all associated site works.	
Brief site description, relevant to WFD Screening,		Site is cleared of all structures and is greenfield in nature, which fronts onto the eastern side of Groody Road and adjoins the existing residential development at Caisleán Na hAbhann. There are no water courses, drainage ditches, bodies of open water or habitats which could be described as wetlands on site. The closest surface water feature to the site and Proposed Development is mapped by the EPA (EPA, 2025) as the Groody River (WFD Name: Groody 025G05 ; River Waterbody Code: IE_SH_25S012600) which is located to the west of the Proposed Development site, approx. 1 km west of the site (at the closest point). The River Groody flows in a northerly direction until its confluence with the River Shannon approximately 1.3km downstream. There are no direct, surface hydrological pathways from the development site to the River Groody.	

	There are, however, indirect pathways to the River Groody and the River Shannon via surface water and wastewater respectively. downstream.
Proposed surface water details	Appropriate drainage design in the form of SuDS will prevent any potential impact to the receiving water quality of downstream waterbodies. Surface water will be managed in accordance with the principles and objectives of SuDS and the GDSDS to treat and attenuate water prior to discharging offsite. Ongoing regular operational monitoring and maintenance of drainage and the SuDS measures will be incorporated into the overall management strategy for the Proposed Development. 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.
Proposed water supply source & available capacity	Confirmation of Feasibility (COF) has been issued to the applicant advising that (water/ wastewater) connections are feasible without infrastructure upgrades. An advice note has been attached to the grant of permission in respect to Confirmation of Feasibility and connection agreements with Uisce Eireann. Uisce Eireann mains water connection. Public Water Supply i.e. Limerick city and Suburbs, which has a green status – ‘Capacity Available’ rating.

Proposed wastewater treatment system & available capacity, other issues	Confirmation of Feasibility (COF) has been issued to the applicant advising that (water/ wastewater) connections are feasible without infrastructure upgrades. An advice note has been attached to the grant of permission in respect to Confirmation of Feasibility and connection agreements with Uisce Eireann. Uisce Eireann Wastewater connection. Public foul drainage system 'Castletroy WWTP', which has a Green rating – 'Spare Capacity Available'.					
Others?	N/A					
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	1km – to the west of the site.	GROODY_010 (IE_SH_25G0502 00)	Moderate	At Risk	None	Yes – indirect pathways via surface water drainage network

Groundwater body	Underlying site	Limerick City East (Site Code: IE_SH_G_138)	Good	At Risk	Agriculture, DWTS	Yes – Development site is inside this groundwater body, hydraulically linked	
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_0 10 (IE_SH_25G0 50200)	No direct hydrological pathways	Water Pollution - Deterioration of surface water quality from	Use of Standard Construction Practice and CEMP	No	Screen out at this stage.

				pollution of 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	GROODY_0 10 (IE_SH_25G0 50200)	No direct hydrological pathways	None	Subject to the implementation of the proposed SuDS strategy, drainage design and standard construction mitigation measures, the identified source-pathway- receptor linkages	No	Screen out at this stage.

					will be appropriately managed		
2.	Ground	Limerick City East (Site Code: IE_SH_G_13 8)	Drainage through soil/ bedrock	Reduction in groundwater quality	The proposed drainage design, impermeable attenuation tanks, pollution prevention measures and construction controls ensure that the development will not adversely affect groundwater quality or groundwater status	No	Screened out at this stage
DECOMMISSIONING PHASE							
1.	N/A	N/A	N/A	N/A	N/A	N/A	N/A