



An
Coimisiún
Pleanála

Inspector's Report PL-501062-LK-26

Development	Demolition of existing commercial building and construction of multi-storey student accommodation.
Location	New Road/Pennywell Road and Old Clare Street, Limerick
Planning Authority	Limerick City and County Council
Planning Authority Reg. Ref.	2561232
Applicant(s)	A&R Supplies (Limerick) Ltd
Type of Application	Permission
Planning Authority Decision	Grant with Conditions
Type of Appeal	Third Party
Appellant(s)	Ray Ryan Martin and Paul Hurley
Observer(s)	None
Date of Site Inspection	26 th May 2026
Inspector	Lorraine Dockery

1.0 Site Location and Description

- 1.1 The subject site, which has a stated area of 0.167 hectares, is located on the corner of Pennywell Road and Old Clare Street in Limerick city.
- 1.2 The site is bounded to the south by Pennywell Road, to the north and northeast by Old Clare Street, to the west by the residential estate of Pennywell Gardens and to the northwest by Old Clare Street Terrace (principally single storey cottages).
- 1.3 The site is currently occupied by A&R Supplies which is stated in the documentation to be a long-established heating and plumbing merchant. There is a two-storey showroom fronting onto Pennywell Road with parking area and associated out-buildings to the rear. Spirit Memorials occupies the southeast corner of the site.

2.0 Proposed Development

- 2.1 The proposed development, as per the submitted public notices, comprises the demolition of existing structures and boundary walls on site and the construction of a new Purpose-Built Student Accommodation (PBSA) multi-storey scheme, alterations to footpaths and roads bounding the site at New Road/Pennywell Road and Old Clare Street and all ancillary site works. Permission is also sought for use of the accommodation, outside of student term time, for short-term letting purposes.
- 2.2 The following is a summary of the key characteristics of the proposed development:

Table 1:

Site Area	0.167 ha
Gross floor area of existing buildings	1050m ²
Demolition Works	1050m ²
Gross floor area of proposed works	3356m ²
No. of bedspaces /height	115 (17 apartments) in 4 no. blocks (A, B, C, D)

	Block A- 32 bedspaces – 5 storeys Block B- 35 bedspaces- 6 storeys Block C- 48 bedspaces- 4 storeys Block D- substation, bins- single storey
Other Uses	• ESB substation • SUDS inclusive of Green Roof (166m²) • Alterations to footpaths and roads bounding the site at New Road/Pennywell Road and Old Clare Street • Creation of a designated set down area on New Road/Pennywell Road
Access	Pedestrian and emergency vehicular access only from Old Clare Street. Main entrance onto Pennywell Road
Parking	96 bicycle spaces
Services	New connection to public mains (water supply) and public sewer (wastewater management). Surface water disposal to public sewer/drain

3.0 Planning Authority Decision

3.1 Decision

GRANT permission subject to 16 no. conditions

Further Information was requested from the planning authority in relation to fire issues; traffic and parking matters and bat survey.

Unsolicited Further Information was twice submitted by the applicant.

3.2 Planning Authority Reports

3.2.1 Planning Reports

Planner's Report- Reflects decision of planning authority, grant of permission recommended

3.2.2 Other Technical Reports

Roads Office- Further Information requested (date 27/02/2026)

Active Travel- Conditions recommended (15/01/26). Response to FI considered acceptable; conditions attached (undated)

Archaeology Section- Insufficient information to make an informed decision on current design (dated 13/01/2026)

Architectural Conservation- Condition attached (09/01/2026)

Ecology Section- Further Information requested (date 26/01/2026). Conditions recommended (dated 27/02/2026).

Fire Section- Conditions attached (dated 07/01/26)

3.3 Prescribed Bodies

None

(It is noted that a CoF from Uisce Eireann is included with the application documentation, which states that water and wastewater connections are both feasible without infrastructure upgrade).

3.4 Third Party Observations

Two observations were received by the planning authority which generally reflect the matters raised in the appeal submissions.

4.0 Planning History

The most recent, relevant history is as follows:

ABP-318133-23

Permission REFUSED for one reason as follows:

1. Having regard to the application site's location, specifically, its location immediately adjacent to the Limerick School of Art and Design Architectural Conservation Area (ACA) 8- Clare Street and Limerick Institute of Technology Campus- School of Art and Design, with buildings and structures identified as areas of local importance to the urban character of Limerick City, and also having regard to the bulk, massing, scale and elevational design of the proposed development, the Board considered that the proposed development failed to deliver the optimum quality design solution that such a location warranted, would detract from the adjacent ACA, would constitute a visually discordant feature that would be detrimental to the distinctive architectural and historic character of this area and would thus conflict with Objective EH 053 of the Limerick Development Plan 2022-2028. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

5.0 Policy Context

5.1 National Planning Policy

Section 28 Ministerial Guidelines

The following list of section 28 Ministerial Guidelines are considered to be of relevance to the proposed development. Specific policies and objectives are referenced within the assessment where appropriate.

- Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)
- Urban Development and Building Heights, Guidelines for Planning Authorities (2018)

Other policy documents of note:

- National Planning Framework, First Revision
- Regional Spatial & Economic Strategy for the Southern Region
- Limerick / Shannon Metropolitan Area Transport Strategy 2040 (LSMATS) (2022)
- The National Student Accommodation Strategy (NSAS) (2017)
- Architectural Heritage Protection, Guidelines for Planning Authorities (2011)
- Appropriate Assessment Guidelines for Planning Authorities
- DHPCLG Circular PL8/2016 APH 2/2016 (July 2016): Encourages co-operation between local authorities and higher education institutes in the provision of student housing. Indicates that student accommodation should not be used for permanent residency but can be use by other persons/groups during holiday periods.
- Guidelines on Residential Developments for 3rd Level Students - Section 50 Finance Act, Department of Education and Science, 1999
- Matters Arising in Relation to the Guidelines on Residential Developments for 3rd Level Students (Section 50 Finance Act 1999), Department of Education and Science, 2005.
- Report on Student Accommodation: Demand and Supply, Higher Education Authority, 2015

5.2 Local Planning Policy

Development Plan

Limerick Development Plan 2022-2028 (as varied by Variation No. 1) applies

Zoning: ‘City Centre’, the objective of which is ‘To protect, consolidate and facilitate the development of the City Centre commercial, retail, educational, leisure, residential, social and community uses and facilities’.

Map 4 – Density Map indicates the site within the density band of 100+.

Urban Character Area - UCA 02 – surrounding suburban area

There are a number of Protected structures directly to the east of the subject site within the Limerick School of Art and Design campus and to the northwest of the

subject site at the HSE Roxtown health centre (Former orphanage/children's home) (RPS 3352) (Regional importance on NIAH 21514007)

The subject site is located between the Architectural Conservation Area ACA 8 Clare Street- School of Art and Design/Roxtown HSE (Limerick School of Art and Design - LSAD) and the Architectural Conservation Area ACA 4 St. John's Square. (Volume 3)

Architectural Conservation Area ACA 8 Clare Street - This assemblage of structures is considered to be of regional significance in terms of its special social and historical significance as the former Convent of the Good Shepherd complex, including a commercial laundry, orphanage and reformatory school in the 19th Century. There is also technical interest in the formidable chimney projecting into the skyline as a landmark feature. Thomond Brewery operated from this site prior to the religious institution locating in the area. There are six structures of significance identified by the NIAH. These include the industrial chimney, entrance gates and walls, the former orphanage, the chapel, the convent built with some Gothic Revival detail and the hostel.

Architectural Conservation Area ACA 4 St. John's Square- This area is one of the most historic locations in Limerick City, located in Irishtown, having 23 structures identified by the NIAH as being of significant importance and interest at a regional level.

Site lies within the Zone of Notification (ZON) for Recorded Monument LI005-017 - the historic city of Limerick.

The site is located on a Secondary Cycle Route - Transport/cycleway delineated along New Road and Pennywell Road and within close proximity of a number of Primary and Green Routes within the Limerick Shannon Metropolitan Transport Strategy 2040 (LSMATS).

Section 4.2.10 Student Accommodation

Objective HO 08: 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.

Section 11.4.4.7 Student Accommodation: When assessing applications for student accommodation the Council will have regard to:

- 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;
- The potential impact on residential amenities: The provision and location of student accommodation will not be permitted where it would have a detrimental effect on established residential amenities
- 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;
- The architectural quality of the design and integration with the wider streetscape with respect to scale, mass, external finishes and landscaping
- The number of existing similar facilities in the area (applicable only to off campus accommodation). In assessing a proposal for student accommodation, the Planning Authority will consider the cumulative impact of student accommodation, which exists in the locality and will resist the overconcentration of such schemes in any one area, in the interests of sustainable development and residential amenity.

Chapter 11 sets out Development Management Standards.

Section 3.4.2.4 and Volume 6 of the Development Plan set out the Building Height Strategy for Limerick City. The subject site sits outside the 'Transition Area Character Area' and is located within 'Rest of Inner City' in the wider strategy designations.

The following policies and objectives are also considered relevant

- Objective CGR O2: Place-making, Universal Design and Public Realm
- Objective HO 02- Density of Residential Developments
- Objective CGR 09- Building Heights

5.3 **Natural Heritage Designations**

The nearest designated sites are the Lower River Shannon SAC (Site Code: 002165) and the River Shannon and River Fergus Estuaries SPA (Site Code 004077) approximately 300m and 600m distant respectively. The Fergus Estuary and Inner Shannon, North Shore proposed Natural Heritage Area (Site Code 002048) is located approximately 800m distant.

5.4 **EIA Screening**

The proposed development has been subject to preliminary examination for environmental impact assessment (refer to Form 1 and Form 2, in the Appendices of this report). Having regard to the characteristics and location of the proposed development and the types and characteristics of the potential impacts, it is considered that there is no real likelihood of significant effects on the environment. The proposed development, therefore, does not trigger a requirement for environmental impact assessment screening and an EIAR is not required.

5.5 **AA Screening**

5.5.1 See Appendix 3 below.

5.5.2 I have considered the proposal in light of the requirements S177U of the Planning and Development Act 2000 as amended.

5.5.3 The subject site is located approximately 300 metres from the Lower River Shannon (SAC) (Site Code 002165) and approximately 600m from the River Shannon and River Fergus Estuaries SPA (Site Code 004077).

5.5.4 The proposed development comprises details as provided in section 2.0 of this report. No nature conservation concerns were raised in the planning appeal. Neither the planning authority nor An Coimisiún Pleanála (in the previous decision on the site) raised concerns in this regard.

5.5.5 Having considered the nature, scale and location of the project, I am satisfied that these sites can be eliminated from further assessment because there is no conceivable risk to any European Site. The reason for this conclusion is as follows:

- Location-distance from nearest European site and lack of connections
- Taking into account the AA Screening report submitted with the application.

- The screening undertaken by the planning authority

I conclude that on the basis of objective information, that the proposed development would not have a likely significant effect on any European Site either alone or in combination with other plans or projects. Likely significant effects are excluded and therefore Appropriate Assessment (stage 2) (under Section 177V of the Planning and Development Act 2000) is not required.

5.6 Water Framework Directive

5.6.1 See Appendix 4 below

5.6.2 I have assessed the proposed development and have considered the objectives as set out in Article 4 of the Water Framework Directive which seeks to protect and, where necessary, restore surface & ground water body in order to reach good status (meaning both good chemical and good ecological status), and to prevent deterioration. Having considered the nature, scale and location of the project, I am satisfied that it can be eliminated from further assessment because there is no conceivable risk to any surface and/or groundwater water bodies either qualitatively or quantitatively. The reason for this conclusion is as follows.

- The nature of the proposed development due to size and scale.
- The location of the nearest water bodies,
- Reports of the planning authority

6.0 The Appeal

6.1 Grounds of Appeal

Two third- party appeal submissions were received, one of which (Ray Ryan submission) was purportedly signed by a number of residents of Pennywell Road, Roxtown Terrace, Cathedral Court, The Gardens, Good Shepherd Villas, Old Clare Street and Old Lelia Street. Photographs were submitted with both submissions. The submissions may be summarised as follows and are expanded upon within the assessment:

Policy conflict/planning history

- Site not located within identified opportunity site for increased height or designated areas for height development and conflicts with Building Height Policy BH3 of Limerick Development Plan 2022
- Notes previous refusal of permission on this site; continues to warrant a cautious and restrictive approach to development at this location
- Use during summer months

Impacts on architectural and historic structures

- Adjacent to Limerick School of Art and Design ACA, formally the Good Shephard Magdelene Laundry and site of The Treaty Brewery c.1870
- Previous decision of ABP determined that the development by reason of its height, density and massing would obscure the legibility of the ACA, diminish its role in placemaking and result in a visually discordant form of development that would be detrimental to the distinctive architectural and historic character of the area
- Proposal fails to adequately respect the architectural and historic significance of the adjoining ACA

Height, scale and massing

- Notes reduction in height but considers that proposal remains substantial in scale relative to surrounding built environment

Impacts on residential amenity

- Impacts on residential amenity due to proposal being attached to their property- loss of privacy, increased noise and vibration, impacts on natural light and disruption; diminish quality of life
- Impacts on property values
- Location of waste management and bin storage area and ESB substation directly adjoining residential property and associated noise, increased activity and visual intrusion; perceived and actual safety concerns; cumulative impacts of these

Impacts on protected wildlife including bats and swifts

- Concerns regarding potential loss of foraging, commuting or roosting opportunities for bats and cumulative ecological impacts on bats
- Concerns regarding disturbance, displacement and long-term impacts on swift population

Other Matters

- Road safety concerns at Hot Corner; parking concerns; fire access
- Boundary matters; impacts on chimney at 35 Roxtown Terrace
- Inaccuracies in documentation
- Construction impacts
- References other developments in city in context of future maintenance
- Lack of consultation

6.2 Applicant Response

A response was received on behalf of the applicant, which may be summarised as follows:

- Outlines background to application/planning history
- Contends that previous decision of ACP envisaged that a revised and more sensitive design solution could be acceptable; not a refusal in principle
- Current proposal is a materially revised scheme; PA decision reflects its conclusion that the revised development successfully resolves the deficiencies identified and now complies with relevant conservation, design and placemaking objectives
- Neither appeal substantively engages with design revisions made; issues raised are largely generalised; appear to conflate the current scheme with that previously refused
- Proposal includes reduction in scale and density from 122 to 115 bedspaces; height reduced from seven to six storeys; more pronounced stepped massing strategy with reduction to single storey at appellant's property; refined elevational treatment and enhanced VIA

- Residential amenity concerns were carefully examined by PA; revised building form and massing have been designed to respond sensitively to surrounding context
- Site located within city centre where a degree of change and intensification is anticipated
- Car-free development, supported by Residential Travel Plan, extensive cycle parking and direct access to high-frequency public transport; PA satisfied in this regard subject to conditions
- Ecological matters were assessed by PA and not identified by PA or ACP in previous appeal
- Bat Survey and Ecological Assessment confirmed site is heavily urbanised brownfield plot of low ecological value, no bat roosts present and no evidence of significant bat activity; mitigation and enhancement measures secured by condition
- Proposal represents a high-quality, policy-compliant regeneration of a brownfield city centre site, delivering purpose-built student accommodation in a sustainable and accessible location adjacent to third-level educational facilities

6.3 Planning Authority Response

None

6.4 Observations

None

6.5 Further Responses

None

7.0 Assessment

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

- Principle of proposed development/policy context
- Design rationale- height, scale and massing
- Built Heritage
- Impacts on residential amenity
- Ecology
- Other Matters

7.2 Principle of proposed development/policy context

- 7.2.1 I refer An Coimisiún to the planning history of the site, whereby permission was refused under ABP-318133-23 for a similar type development. This current proposal has been reduced to 115 bedspaces (17 apartments) from 122 bedspaces (19 apartments) previously refused. The height has also been reduced by one storey to a maximum height of 6 storeys. I note that the principle of student accommodation was not raised as an issue in the previous appeal on the site.
- 7.2.2 The subject site is zoned 'City Centre' as per the Limerick Development Plan 2022 with student accommodation being 'generally permitted' within such zones. Section 11.4.7 Student Accommodation of the Plan states that the Council will support the provision of on-campus accommodation and purpose built-professionally managed student accommodation off-campus at suitable locations. The planning authority highlight that the need for purpose-built student accommodation is identified within the National Planning Framework, which notes that demand for student accommodation exacerbates the demand pressures on the available supply of rental accommodation in urban areas in particular. The planning authority state that they welcome the development of this infill site.
- 7.2.3 I note section 11.4.4.7 Student Accommodation of the operative Development Plan which sets out a number of criteria in which to have regard to in assessing applications for student accommodation. I consider that the proposal is generally in compliance with each of the criteria set out in this section of the Plan. The subject site is located immediately opposite the Limerick School of Art and Design campus, it is stated to be within 13 mins cycle to UL and less than 10 mins cycle to Mary Immaculate College, within close proximity to high quality public transport corridors, cycle and pedestrian routes. The site is located on a Secondary Cycle Route with

transport/cycleway delineated along New Road and Pennywell Road and within close proximity of a number of Primary and Green Routes within the Limerick Shannon Metropolitan Transport Strategy 2040 (LSMATS). My assessment below demonstrates that the proposal would not have a detrimental effect on established residential amenities. The proposal includes for the provision of on-site facilities, including storage facilities, waste management, cycle parking, leisure facilities and amenity areas. The architectural quality of the design is such that it integrates well with the wider streetscape with respect to scale, mass, external finishes and landscaping (see assessment below). I have no information before me to believe that there is an overconcentration of such schemes in this area. A Student Demand and Concentration Report was submitted with the application documentation and I note contents of same.

- 7.2.4 Having regard to all of the above including the history of the site (in which the principle of this type of development was not raised as an issue), the nature of the proposal, and local/national policy considerations that encourage the provision of such uses, I consider that the principle of the proposed development is consistent with the zoning objective, consistent with section 11.4.4.7 of the Plan and is acceptable in principle in this mixed-use location.

7.3 Design Rationale

- 7.3.1 Third-parties raised concerns regarding the height, scale and massing of the proposed development. The planning authority consider that the proposal has made a positive attempt to integrate into the current streetscape while taking into consideration the existing residential nature of the immediate area and that of the adjacent protected structures.
- 7.3.2 The proposal provides for 115 bedspaces (17 apartments) in 4 no. perimeter blocks. The maximum height is 6 storeys. Communal open space is provided at ground floor level. Having regard to the proposed student accommodation use there is no requirement in the Development Plan to provide public open space within the scheme.
- 7.3.3 Table 3.23 of the Development Plan sets out Urban Character Areas (UCA) and Objectives for the differing areas. The subject site is identified as being within UCA 02 – surrounding suburban area. This area is substantially residential in character

with a range of services and covers the suburbs immediately adjoining the inner city area. It is a specific objective to prioritise infill and brownfield sites within these suburbs and the building height strategy would inform the design of higher buildings.

Height

- 7.3.4 As stated above, the proposed development ranges in height from single storey to six storeys. Volume 6 of the Development Plan sets out the Building Height Strategy for Limerick city, which does not set out blanket numerical height limits. The planning authority note that the site is zoned city centre and is immediately adjacent to the Limerick School of Art and Design which has been identified in the Building Height Strategy as a 'Key Growth Area 9' (Map 3.15) and a 'known area for height development.' The strategy outlines that 'these areas have the ability and capacity to deliver compact growth in line with national and regional policy and represent key growth areas for the City.' The planning authority state that they are satisfied that the principle of the proposal complies with Objective CGR O9 Building Heights which encourages the delivery of tall buildings in the City Centre.
- 7.3.5 Variation in height is noted within the immediate vicinity of the site, ranging from single storey to seven storeys (chapel dome). I note the policies and objectives within Rebuilding Ireland – The Government's Action Plan on Housing and Homelessness and the National Planning Framework, First Revision which fully support and reinforce the need for urban infill residential development such as that proposed on sites within existing urban areas. I consider this to be one such site.
- 7.3.6 The Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024) recognise that in order to achieve compact growth we will need to support, amongst other ways, the more intensive use of previously developed land and infill sites, in addition to the development of sites in locations served by existing facilities and public transport. I am also cognisant of the Urban Development and Building Heights, Guidelines for Planning Authorities (2018) which sets out the requirements for considering increased building height in various locations but principally, inter alia, in urban and city centre locations and suburban and wider town locations. It recognises the need for our cities and towns to grow upwards, not just outwards. I have had particular regard to the development management criteria, as set out in section 3.2 of these Guidelines, in assessing this

proposal including at the scale of relevant city/town, at the scale of district/neighbourhood/street, at the scale of the site/building, together with specific assessments. See below.

Table 2:

At scale of relevant city/town
• Proposal assists in securing objectives of the NPF, in terms of focusing development in key urban centres, fulfilling targets in relation to brownfield, infill development and delivering compact growth • Site is well served by public transport • Proposal would successfully integrate into/enhance the character and public realm of the area and makes a positive contribution to place-making. Photomontages and Architects Urban Design Statement submitted • Proposal would not adversely affect the skyline- height of nearby buildings noted and consistent with local policy objectives • Given the scale of development proposed, I have no information before me to believe that the drainage infrastructural carrying capacity of the area could not accommodate the proposed development. Neither the PA nor Uisce Eireann have raised concerns in this regard (no report received from UE).
At District/Neighbourhood/Street Level
• Proposal responds well to its overall environment and would make a positive contribution to the urban neighbourhood/streetscape of the area • Proposal puts forward a good design response- it is not monolithic nor does it have long, uninterrupted walls of building • High quality, well considered materials proposed- this matter could be adequately dealt with by means of condition • Proposal would enhance the overall urban design context. Presently the site adds little to the streetscape; currently an underutilised brownfield site

• Proposal would make a positive contribution to legibility of the area; good public realm is proposed; would make an appropriate level of enclosure of streets/spaces • Proposal would positively add to the mix of uses within the area; would allow meaningful contact between the development and the street and would make a positive contribution to the character and identity of the area. • Proposal would respect the form of buildings and landscape around the site's edges and the amenity enjoyed by neighbouring properties. This has been demonstrated in the submitted documentation
At site/building scale
• Proposed design maximises access to natural daylight, ventilation and views and minimise overshadowing. The proposal has been examined in the context of BRE guidelines and I am satisfied in this regard • Proposal ensures no significant adverse impact on adjoining properties by way of overlooking, overbearing and/or overshadowing. Any impacts are considered to be in line with what one would expect within such an urban area • Proposal would result in an effective urban design and streetscape solution
Specific Assessments
• Environmental assessment has been undertaken within this report and I am satisfied in this regard

7.3.7 One of the third-party submissions received considers that the proposal is in conflict with Policy BH3 of the Plan which seeks to protect the unique intrinsic character and scale of Limerick City and it's skyline in the delivery of increased building heights. I do not concur with this assertion. I consider this to be a brownfield, infill site that is currently underutilised- a site which would benefit from an appropriate redevelopment. A stepped height is proposed ranging from single storey to 6 storeys. The previous refusal on the site (at maximum 7 storeys) did not raise concerns with the height specifically but instead with the bulk, massing, scale and

elevational design at this location. Photomontages have been submitted to support the application. The overall height of the building does not to exceed that of the neighbouring brick chimney, or chapel dome of Limerick School of Art and Design. The height of the building gradually transitions down from south to north to single storey, to respect the scale of the existing dwellings on Old Clare Street. This is a major difference between the current proposal and that previously refused on the site. I am satisfied that if permitted as proposed, the development before me would make a positive contribution to the streetscape at this location comprising a quality development that provides adequate levels of amenity for all. I consider the height proposed to be acceptable in this context and that the proposal, if permitted, would not impact negatively on the unique intrinsic character and scale of Limerick City and it's skyline. I consider the height as proposed to be acceptable and the proposal to be in compliance with Development Plan policy, specifically the building height policy as set out in Volume 6 of the Plan.

Density

- 7.3.8 I highlight to An Coimisiún that this was raised as an issue in the third-party submissions received. The Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities provide, in footnote 3 (Page 18), a guide to calculating densities for shared accommodation, such as student housing where four bedspaces shall be the equivalent of one dwelling. Therefore, the proposed development equates to 29 dwellings on a site area of 0.160ha with a density of 181 dph (net). The proposed density is therefore in accordance with the Compact Settlement Guidelines for Limerick City-Centre (Table 3.2), where it is a policy and objective that residential densities in the range of 100 dph to 250 dph (net) shall generally be applied in the centres of Limerick, Galway and Waterford. Furthermore, the site is located within Density Zone 1 City Centre, Central and Accessible Locations as per the Limerick Development Plan 2022. This requires a minimum net density of 100+ units/hectare. The proposal is therefore in compliance with same.
- 7.3.9 It is my view that the density proposed is acceptable and in accordance with provisions of the Development Plan with regard to Policy CS P2 which aims to support the compact growth of the metropolitan area and Objective HO O2 which aims to promote, where appropriate increased density. In addition, a number of

Objectives of the National Planning Framework, First Revision and SPPR3 and SPPR4 of the Urban Development and Building Heights Guidelines, all support higher density developments in appropriate locations, to avoid the trend towards predominantly low-density commuter-driven developments.

- 7.3.10 Given the locational context of the site within a zoned city centre area in the immediate vicinity of existing and planned high-capacity public transport corridor, within walking distance of a number of established services and facilities and in proximity to third-level institutions, I am satisfied that the proposed density is acceptable and that the proposal does not represent overdevelopment of the site. Having regard to the assessment and conclusion set out above, I am satisfied that the proposed development is consistent with the requirements of planning policy at national, regional and local level.

Elevational Treatment

- 7.3.11 A variety of architectural styles are noted within the vicinity. The elevational treatment of the proposal is considered acceptable, which seeks to reflect some of the features/elements of the nearby LSAD. I am generally satisfied in this regard and consider that the proposal would improve the streetscape at this location. A strong corner element is proposed at the corner of New Road and Old Clare Street. Red brick is proposed as the main finish to elevations. Details of materials could be dealt with by means of condition, if An Coimisiún is disposed towards a grant of permission. I consider that the previous reason for refusal relating to this matter has been substantially overcome.

Conclusion

- 7.3.12 I note the locational context of the site, within an area zoned city centre, approximately 15minute walking distance of the UL Campus, employment locations and high frequency urban bus services including Dublin Road BusConnects route. I am satisfied with the design rationale put forward and consider that the height, scale and massing of the proposal is appropriate to this locational context. Having regard to the brownfield, infill nature of this site, to the quality design and layout of the scheme and the landscaping proposals, the proposed development would successfully integrate into the streetscape and would support the consolidation of the urban environment. The proposal is therefore considered to be in accordance with

the provisions of Section 11.4.4.7 and UCA 02 of the Development Plan. In addition, having regard to the Guidelines on Urban Development and Building Heights, I am satisfied that the proposed development represents a reasonable response to its context. I consider that the previous reason for refusal has been overcome in this instance and that the proposal would be consistent with the proper planning and sustainable development of the area.

7.4 Built Heritage/Archaeology

- 7.4.1 Third-parties have raised concerns in relation to impacts on the surrounding architectural heritage. They note that subject site lies adjacent to the Limerick School of Art and Design ACA and consider that the proposal fails to adequately respect the architectural and historic significance of the adjoining ACA. They note the previous decision of ABP in this regard. They consider that the proposal would obscure the legibility of the ACA, diminish its role in placemaking and result in a visually discordant form of development that would be detrimental to the distinctive architectural and historic character of the area.
- 7.4.2 The planning authority note the report of their Conservation Officer who states that *'The scale, height and massing of the proposed development responds to the height of two prominent Protected Structures within the A.C.A. – the former Convent Chapel and the Chimney. The visual impact assessment submitted clearly illustrates that views from the surrounding area towards these two landmarks will be retained, with the exception of Viewpoint PM12. Similarly the view from Clare Street towards the spire of St. John's Cathedral will not be obstructed. I therefore consider the visual impact of the proposal on its setting and on views to landmark structures to be acceptable'*.
- 7.4.3 As stated, the subject site is located between the Architectural Conservation Area ACA 8 Clare Street- School of Art and Design/Roxtown HSE (Limerick School of Art and Design - LSAD) and the Architectural Conservation Area ACA 4 St. John's Square. (Volume 3 of Limerick Development Plan 2022).
- 7.4.4 I have examined all of the information before me in this regard. A Final Archaeological Assessment Report was submitted with the application documentation, together with an Architectural Heritage Impact Assessment. Photomontages, which seek to demonstrate the impact that the proposal will have on

the visual amenity/built heritage of the area, were also submitted. I note that the planning authority referred the application to An Taisce and DAU, with no responses received. I again note the locational context of the site, immediately adjacent to the Limerick School of Art and Design which contains a number of Protected Structures. While there are a number of Protected Structures in the vicinity, there are none within the site boundary. While I acknowledge that there will be a change in outlook if the proposal is constructed as proposed, moving from an underutilised site of low-rise, poor-quality structures as existing to that currently proposed. I do not consider this to be a negative. I am satisfied that the proposal on this infill site would not detract from the built heritage or visual amenity of the area to such an extent as to warrant a refusal of permission in this regard. A sensitive design has been put forward that respects the locational context of the site. I am satisfied that the proposed development, located within Limerick city, can be adequately accommodated on this site without impact to the visual amenities or architectural heritage of the area; would integrate well with the existing pattern of development in the vicinity and would lead to the rejuvenation of an underutilised, brownfield site.

7.4.5 The site is located within the Historic Town of Limerick (recorded monument LI005-017) and 100m from the city defences. The report of the Archaeology section of the planning authority is noted which recommended a refusal of permission as they state that there is insufficient evidence to make an informed decision on the current design. The planning authority states that these comments have been taken into consideration in the assessment of the proposal and note that the applicant has outlined mitigation measures in the Planning Statement submitted, which are considered acceptable. I note that the matter of archaeology did not form a reason for refusal in the previous decision on the site. Having regard to the information before me, including that this is a previously disturbed brownfield site, I am satisfied that the matter of archaeology could be adequately dealt with by means of condition, if An Coimisiún is disposed towards a grant of permission.

7.4.6 A balance needs to be achieved between protecting the character and setting of our historic structures/areas whilst at the same time permitting sensitive development that meets the current demands of society. I am satisfied that this balance is being achieved in this instance. It is commonplace to see historic buildings sit side by side with new interventions, without detracting from each other as a city evolves and

develops. Without this evolution, a city becomes stagnant. I consider that the revised design put forward in this current appeal addresses the concerns raised by ACP in the previous reason for refusal on the site. I do not consider that the proposal, if permitted, would obscure the legibility of the ACA, diminish its role in placemaking or result in a visually discordant form of development that would be detrimental to the distinctive architectural and historic character of the area. I am satisfied in this regard, subject to conditions.

7.5 Impacts on residential amenity

7.5.1 Third-parties have raised concerns in relation to impacts on residential amenity including that the proposal is directly attached to one property which would result in loss of privacy, increased noise and vibration, impacts on natural light and disruption and diminish quality of life. Concerns were also raised in relation to impacts on property values and location of waste management/bin storage area and ESB substation directly adjoining residential property and their associated noise, increased activity/visual intrusion; perceived/actual safety concerns and cumulative impacts of same.

7.5.2 In terms of impacts on the amenity of existing development in the area, I acknowledge at the outset that there will be a change in outlook as the site moves from its brownfield nature to that accommodating a development such as that proposed. This is not necessarily a negative. In terms of impacts on residential amenity, I am cognisant of the relationship of the proposed development to neighbouring properties. Having examined the proposal, I am of the opinion that separation distances with existing properties typical, or greater, than what would normally be anticipated within such an established, urban area are proposed. In my opinion, any impacts are in line with what might be expected in an area such as this and therefore are considered not to be excessively overbearing given this context. The design rationale is noted and is considered acceptable.

Daylight, Sunlight, Overshadowing

7.5.3 Section 3.2 of the Urban Development and Building Height Guidelines (2018) 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. The Guidelines state that appropriate and

reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the BRE 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting'. Additionally, section 11.4.2.3 of the Development Plan states that as a standard, all habitable rooms within new residential units shall have access to appropriate levels of natural daylight and be guided by the principles of Site Layout Planning for Daylight and Sunlight, A guide to good practice (Building Research Establishment Report, 2011) and/or any updated guidance.

7.5.4 A Sunlight, Daylight & Shadow Assessment (Impact Neighbours and Development Performance) was submitted with the application documentation. The analysis has been carried out in accordance with the recommendations of Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice - Third Edition (BRE Guidelines 2022). I have considered the report submitted by the applicant and have had regard to BS 8206-2:2008 (British Standard Light for Buildings- Code of practice for daylighting) and BRE 209 – Site Layout Planning for Daylight and Sunlight: A guide to Good Practice (2011). The latter document is referenced in the section 28 Ministerial Guidelines on Urban Development and Building Heights (2018). I also note the publication of the BRE Guide, which replaced the 2011 edition, in June 2022 (in the UK), however, I am satisfied that this updated guidance does not have a material bearing on the outcome of the assessment. I have carried out a site inspection.

7.5.5 In designing a new development, it is important to safeguard the daylight to nearby buildings. I have had regard to the guidance documents referred to in the Ministerial Guidelines and the Limerick Development Plan to assist in identifying where potential issues/impacts may arise. BRE guidance given is intended for rooms in adjoining dwellings where daylight is required, including living rooms, kitchens, and bedrooms. The Building Height Guidelines refer to the Building Research Establishments (BRE) 'Site Layout Planning for Daylight and Sunlight – A guide to good practice' and ask that 'appropriate and reasonable regard' is had to the BRE guidelines. However, it should be noted that the standards described in the BRE guidelines are discretionary and are not mandatory policy/criteria and this is

reiterated in Paragraph 1.6 of the BRE Guidelines. Of particular note is that, while numerical guidelines are given with the guidance, these should be interpreted with flexibility since natural lighting is only one of many factors in site layout design, with factors such as views, privacy, security, access, enclosure, microclimate and solar dazzle also playing a role in site layout design (Section 5 of BRE 209 refers). The standards described in the guidelines are intended only to assist my assessment of the proposed development and its potential impacts. Therefore, while demonstration of compliance, or not, of a proposed development with the recommended BRE standards can assist my conclusion as to its appropriateness or quality, this does not dictate an assumption of acceptability or unacceptability. I note that the criteria under section 3.2 of the Building Height Guidelines at the scale of site/building include the performance of the development in relation to minimising overshadowing and loss of light.

- 7.5.6 I am of the opinion that the proposed development will lead to the urban regeneration of this underutilised brownfield site and that an effective urban design solution has been put forward which will enhance the streetscape at this location. Paragraph 2.2.7 of the BRE Guidance (Site Layout Planning for Daylight and Sunlight - 2011) notes that, for existing windows, if the VSC is greater than 27% then enough skylight should still be reaching the window of the existing building. Any reduction below this would be kept to a minimum. BRE Guidelines recommend that neighbouring properties should retain a VSC (this assesses the level of skylight received) of at least 27%, or where it is less, to not be reduced by more than 0.8 times the former value (i.e. 20% of the baseline figure). This is to ensure that there is no perceptible reduction in daylight levels and that electric lighting will not be needed more of the time. A VSC analysis was conducted on the windows of the properties in the vicinity of the site. I am satisfied that all relevant points have been considered. The results confirm that access to daylight for existing surrounding dwellings, when compared with their existing baseline experience, will not be significantly compromised as a result of the proposed development as all points assessed meet BRE recommendations. 94% of tested windows comply with BRE guidelines in terms of VSC. It is acknowledged that 3 no. windows in Group B1 are below the BRE targets. Having regard to above, I am generally satisfied in this regard.

- 7.5.7 In terms of sunlight, the impact on sunlight to neighbouring windows is generally assessed by way of assessing the effect of the development on Annual Probable Sunlight Hours (APSH) and Winter Probable Sunlight Hours (WPSH). A target of 25% of total APSH and of 5% of total WPSH has been applied. See table on page 9 of submitted report. All windows within 90 degrees of due south, whether they serve a living room or not, were assessed. The BRE Guidelines suggest that windows with an orientation within 90 degrees of due south should be assessed. When tested with the proposed development in place, it was found that there would be only negligible impact to the amount of annual and winter sunlight of all analysed windows. 100% of tested windows comply with BRE guidelines in relation to APSH and WPSH. I am satisfied in this regard.
- 7.5.8 In relation to overshadowing, BRE guidelines state that an acceptable condition is where external amenity areas retain a minimum of 2 hours of sunlight over 50% of the area on the 21st March. The submitted report concludes that 100% of tested neighbouring amenity spaces pass the BRE 2-hours of sunlight on the 21st of March or 0.8 ratio requirement and that the proposed development complies with the requirements of the BRE Guidelines for impact on amenity Sunlight/Shadow.
- 7.5.9 To conclude, while there may be some impacts on nearby properties, this level is considered to be acceptable. In my opinion, and based upon the analysis presented, the proposed development does not significantly alter daylight, sunlight or overshadowing impacts from those existing and this is considered acceptable. The proposed development is located on a brownfield site identified for development in a zoned city centre location. The planning authority have not raised concerns in this regard. An Coimisiún Pleanála did not raise concerns in this regard in their previous decision on the site. Having regard to the scale of development permitted or constructed in the wider area and to planning policy for densification of the urban area, I am of the opinion that the impact is consistent with emerging trends for development in the area and that the impact of the proposed development on existing buildings in proximity to the application site may be considered to be consistent with an emerging pattern of development in the wider area. This is

considered reasonable. While there will be some impacts, on balance, the associated impacts, both individually and cumulatively are considered to be acceptable.

Noise and Nuisance

- 7.5.10 Concerns were raised by third parties regarding increased noise and nuisance for existing residents. The proposed scheme does not include any balconies and all communal open space is located at the ground floor level. It is my view that the operational phase of the development would not give rise to levels of noise that would be inappropriate in a residential context within an urban area. It is also noted that this scheme would be professionally managed and any concerns regarding noise disturbance from future occupants would be addressed through the Student Accommodation Management Plan.

Vibration Impacts

- 7.5.11 Concerns were raised regarding increased vibrations during the course of the proposed development. I acknowledge that proposed construction phase would likely result in some vibrations, however, these works would be temporary in nature. There is nothing unique or particularly challenging about this urban site and I am satisfied that subject to implementation of best practice control measures no significant impacts are predicted.

Construction Impacts

- 7.5.12 Concerns raised in relation to construction impacts could be adequately dealt with by means of condition, through the submission of a final Construction and Environmental Management Plan, if An Coimisiún is disposed towards a grant of permission. Any construction impacts would be short-lived in duration and temporary in nature and I consider that any such negative impacts arising from the construction phase of development would not be so great as to warrant a refusal of permission. I recommend that the matter of construction management be dealt with by means of condition, if An Coimisiún is disposed towards a grant of permission. This matter was not raised as an issue in the previous decision on the site.

Overlooking

- 7.5.13 Having regard to the separation distances involved and the design of the proposed scheme, I do not have undue concerns with regards the impacts on overlooking of properties in the vicinity of the proposed development.

Location of Bin/Waste Storage building

- 7.5.14 Concerns were raised regarding the location of the bin store/ESB sub-station and possible impacts this may have on properties located adjoining on Old Clare Street. I note that the proposed uses are fully contained within a single storey building. Access is from the southern elevation, away from the properties on Clare Street. The height of the structure reflects that of the existing cottages and allows for the provision of the taller elements of the proposal away from these cottages. I am generally satisfied in this regard and consider any impacts from the location of the waste storage area/ESB substation would not be so great as to warrant a refusal of permission.
- 7.5.15 Given the height of the proposed bin store/ESB substation, I do not envisage any impacts on the chimney of No. 35 Roxtown Terrace (Old Clare Street). The height of this structure is significantly lower than the ridge height of the existing cottages.

Devaluation of Property

- 7.5.16 I have no information before me to believe the proposal would lead to devaluation of property in the vicinity.

Management/use outside of term-time

- 7.5.17 A Student Management Plan was submitted with the application documentation. The use of the proposed student accommodation development during the summer months has been raised as a concern in the third-party submissions received. The public notices state that permission is also sought for use of the accommodation, outside of student term time, for short-term letting purposes. I do not have issue in this regard. The use of such developments for short-term letting, outside of term-time, is commonplace in other areas. I consider that the matter of the management of same could be adequately dealt with by means of condition, if An Coimisiún is disposed towards a grant of permission. The planning authority have not raised concerns in this regard.

Conclusion

- 7.5.18 To conclude, having regard to all of the information before me, I am satisfied that the proposed development would not impact on residential amenities to such an extent as to warrant refusal of permission.

7.6 Ecology

- 7.6.1 Third-parties have raised concerns in relation to impacts on wildlife including potential loss of foraging, commuting or roosting opportunities for bats and cumulative ecological impacts on bats. Concerns regarding disturbance, displacement and long-term impacts on swift population were also raised. In response, the first party state that a Bat Survey and Ecological Assessment confirmed that the site is a heavily urbanised brownfield plot of low ecological value; that no bat roosts are present and there is no evidence of significant bat activity.
- 7.6.2 A Bat Survey and AA Screening Report were submitted with the application documentation. I note that a bat survey was undertaken in June 2025, which confirmed that no bat roosts are present within the site and that overall bat activity in the area is extremely limited, with only occasional pipistrelle passes recorded. No foraging or roosting activity was detected. The planning authority requested Further Information in relation to clarity on the submitted bat survey. A response was received from the first party which confirmed the buildings surveyed, the roost potential assigned to each structure and the extent of the emergence survey undertaken. The response further confirmed that no bats are present on the site and that no further surveys are required. The planning authority were satisfied in this regard.
- 7.6.3 I note Condition No. 14 of the grant of permission which issued from the planning authority which related to the provision of swift boxes/bricks. I recommend that if An Coimisiún is disposed towards a grant of permission, that a similarly worded condition be attached to any such grant. This is an urban, brownfield site of low ecological value. High levels of artificial light are noted, given its locational context. The site is dominated by hard surface and commercial buildings, which offer poor roosting potential. Having regard to all of the information before me, I am satisfied that impacts on ecology/biodiversity would not be so great, as to warrant a refusal of permission.

7.7 Other Matters

Traffic Issues

- 7.7.1 Third-party submissions raised concerns in relation to road safety concerns including parking concerns and fire access.
- 7.7.2 96 no. bicycle spaces are proposed, with zero car parking spaces. Pedestrian and emergency vehicular access only will be provided from Old Clare Street while residents would access the site via the main entrance lobby on Pennywell Road. A set down area is proposed outside the entrance lobby on Pennywell Road, together with a second and a set down area for a refuse lorry along Old Clare Street. I note the reports of the planning authority in relation to road safety, which do not express objections to the proposal subject to conditions. An updated Residential Travel Plan was submitted as part of the Further Information response to the planning authority. The Active Travel section of the planning authority have no objections, subject to conditions.
- 7.7.3 The site is located within Parking Zone 1 of the Limerick Development Plan. Table DM 9(a) student accommodation requires 1 space per 20 beds. The total number of bed spaces proposed is 115 bed spaces, which would equate to a requirement of 6 parking spaces. I highlight to An Coimisiún that Table DM 9 (a) further states that for building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha., car parking provision may be relaxed in part or whole, on a case-by-case basis, subject to overall design quality and location. The planning authority are of the opinion that given that the site is an urban infill scheme on a site of 0.016 hectares and note its close proximity to public transport links i.e. cycle infrastructure and bus connects, they consider that the proposal is acceptable. Furthermore, the Roads Department have reviewed the proposal and have stated that they are satisfied with the information subject to recommended conditions. The site is considered to be strategically located- on a Secondary Cycle Route, within close proximity of a number of Primary and Green Route cycle routes and in close proximity to the bus priority network, as identified within the Limerick Shannon Metropolitan Transport Strategy 2040 (LSMATS). I would concur with the opinion of the planning authority in this regard and consider that given the locational context of the site within an area zoned for city centre uses, the nature of the use proposed, the

proximity to walking, cycling and public transport infrastructure, that the non-provision of car parking spaces is acceptable in this instance.

- 7.7.4 Concerns raised regarding fire access are noted. I highlight that emergency access is proposed from Old Clare Street. An 'Initial assessment in relation to Fire Safety Certificate' was submitted with the application documentation. I note that compliance with the Building Regulations is outside the remit of this planning appeal. The Fire and & Emergency Services section of the planning authority were satisfied with the proposal. I note that a 'Fire Tender Turning Area' is outlined on the submitted Site Layout Plan and a 'Swept Path Analysis' (Dwg. S028L-0011). I am generally satisfied in this regard.
- 7.7.5 The planning authority requested, by means of condition details showing existing footpath fronting the proposed development over the length of the site replaced/reconstructed and widened, as per the requirements of the planning authority, a Mobility Management Strategy and an Outdoor Lighting Layout Plan. I recommend that if An Coimisiún is disposed towards a grant of permission, that such matters be dealt with by means of condition.
- 7.7.6 I note that traffic and parking issues were not raised as an issue by An Coimisiún in the previous decision on the site. I have no information before me to believe that the proposal would lead to the creation of a traffic hazard or obstruction of road users. I consider the proposal to be consistent with the proper planning and sustainable development of the area.

Consultation

- 7.7.7 Lack of consultation with local residents was raised as a concern in the submissions received. While such consultation may be beneficial, there is no provision in the legislation for same.

Boundary Treatments

- 7.7.8 The matter of boundary treatments could be adequately dealt with by means of condition, if An Coimisiún is disposed towards a grant of permission.

Maintenance of buildings outside of site area

- 7.7.9 The matter of maintenance of other buildings within the wider area is outside the remit of this appeal.

Inaccuracies

- 7.7.10 The matter of inaccuracies in the submitted documentation has been raised as a concern by the third-parties. I consider that any inaccuracies are not material and do not affect the outcome of my recommendation.

Consideration of Local Authority Conditions

- 7.7.11 Table 3 below details the reasoning behind my recommended conditions for the proposed development.

PA Condition No.	Subject	Included/Modified/Excluded in Schedule of Conditions and reasons
1	Plans and Particulars	Modified Covered in Condition No.1 (Standard ACP condition)
2	Contribution	Modified Covered in Condition No.19 (Standard ACP condition)
3	Use	Modified Covered in Condition No. 3 Final Student Management Plan- Modified , covered in Condition No. 2
4	Student Management	Modified Covered in Condition No.4
5	Archaeology	Modified Covered in Condition No.17 (Standard ACP condition)

6	Working Hours	Modified Covered in Condition No.7 (Standard ACP condition)
7	Construction Traffic	Modified Covered in Condition No.6 (Standard ACP condition)
8	Construction Management/Delivery plan	Modified Covered in Condition No.14 (Standard ACP condition)
9	Roads	Modified Covered in Condition No.6 (Standard ACP condition) Replacement/Reconstructed footpath- Modified , covered in Condition No. 2
10	Servicing	Modified Covered in Condition No.12 (Standard ACP condition)
11	Lighting	Modified Covered in Condition No.6 (Standard ACP condition)
12	Surface Water/SuDS Management Plan	Modified Covered in Condition No.8 (Standard ACP condition)
13	Active Travel- Mobility Management Strategy	Modified Covered in Condition No.2 (Standard ACP condition)
14	Ecology- swift boxes/bricks	Modified Covered in Condition No.2 (Standard ACP condition)
15	Landscaping	Modified Covered in Condition No.10 (Standard ACP condition)
16	Waste Management Plan	Modified Covered in Condition No.16 (Standard ACP condition)

8.0 Recommendation

I recommend a GRANT of permission, subject to conditions

9.0 Reasons and Considerations

Having regard to the pattern of development in the area and its city centre zoning under the Limerick Development Plan 2022-2028, it is considered that, subject to compliance with conditions below, the proposed development would provide a high-quality development on an underutilised site; would not seriously injure the character and heritage of the area or the amenities of property in the vicinity and would be acceptable in terms of traffic safety and convenience. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.

10.0 Conditions

1.	The development shall be carried out and completed in accordance with the plans and particulars lodged with the application, except as amended by Further Information received by the planning authority on the 22nd day of December 2025, 14th day of January 2026 and 12th day of February 2026, except as may otherwise be required in order to comply with the following conditions. Where such conditions require details to be agreed with the planning authority, the developer shall agree such details in writing with the planning authority prior to commencement of development and the development shall be carried out and completed in accordance with the agreed particulars. Reason: In the interest of clarity.
2.	Prior to commencement of development, the developer shall submit to the planning authority for their written agreement: (i) Final Student Accommodation Management Plan, which shall include management scheme shall also include adequate

	measures for the future maintenance of open spaces, roads and communal areas. (ii) Details showing existing footpath fronting the proposed development over the length of the site replaced/reconstructed and widened, as per the requirements of the planning authority (iii) Mobility Management Strategy (iv) Outdoor Lighting Layout Plan (v) Details of proposed swift boxes/bricks (vi) Details of proposed boundary treatments Reason: In the interests of clarity and the proper planning and sustainable development of the area
3.	The proposed development shall be used for: a. student accommodation 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. Reason: In the interests of the proper planning and sustainable development of the area

4.	The proposed development shall be implemented as follows: a. The student accommodation and complex shall be operated and managed in accordance with the measures indicated in the Student Accommodation Management Plan submitted with the application, b. Student units / apartments shall not be amalgamated or combined. Reason: In the interests of the amenities of occupiers of the units and surrounding properties.
5.	Details of the materials, colours and textures of all the external finishes to the proposed development shall be submitted to, and agreed in writing with, the Planning Authority prior to commencement of development. Reason: In the interest of visual amenity.
6.	The developer shall comply with all requirements of the planning authority in relation to roads, access, lighting and cycle parking arrangements. In particular: (a) The roads and traffic arrangements serving the site (including signage) shall be in accordance with the detailed requirements of the Planning Authority for such works and shall be carried out at the developer's expense. (b) The roads layout shall comply with the requirements of the Design Manual for Urban Roads and Streets, in particular carriageway widths and corner radii; (c) The materials used in any roads / footpaths provided by the developer shall comply with the detailed standards of the Planning Authority for such road works,

	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 traffic safety and convenience.
7.	Site development and building works shall be carried out only between the hours of 0700 to 1900, Mondays to Fridays inclusive, between 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.
8.	Drainage arrangements including the attenuation and disposal of surface water, shall comply with the requirements of the planning authority for such works and services. Prior to the commencement of development, the developer shall submit to the planning authority for written agreement a Stage 2 - Detailed Design Stage Storm Water Audit. Upon completion of the development a Stage 3 Completion Stormwater Audit to demonstrate Sustainable Urban Drainage System measures have been installed and are working as designed and that there has been no misconnections or damage to storm water drainage infrastructure during construction, shall be submitted to the planning authority for written agreement. Reason: In the interest of public health and surface water management

9.	Prior to the commencement of development, the developer shall enter into a Connection Agreement (s) with Uisce Éireann (Irish Water) to provide for a service connection(s) to the public water supply and/or wastewater collection network. Reason: In the interest of public health and to ensure adequate water/wastewater facilities.
10.	The site shall be landscaped in accordance with the detailed comprehensive scheme of landscaping, which accompanied the application submitted, unless otherwise agreed in writing with, the planning authority prior to commencement of development. The developer shall retain the services of a suitably qualified Landscape Architect throughout the life of the site development works. The approved landscaping scheme shall be implemented fully in the first planting season following completion of the development or each phase of the development and any plant materials that die or are removed within 3 years of planting shall be replaced in the first planting season thereafter. Reason: To ensure a satisfactory completion and maintenance of the development in the interests of residential amenity and in the interests of protecting the environment
11.	Proposals for an apartment naming / numbering scheme and associated signage shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. Thereafter, all signs, and apartment numbers, shall be provided in accordance with the agreed scheme. The proposed names shall be based on local historical or topographical features, or other alternatives acceptable to the planning authority. 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 of locally appropriate place names for new residential areas.
12.	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 interest of visual and residential amenity.
13.	Notwithstanding the exempted development provisions of the Planning and Development Regulations, 2001, or any statutory provision amending or replacing them, no additional plant, solar/PV panels, machinery or telecommunications structures shall be erected on the roof of the proposed development. No fans, louvres or ducts shall be installed unless authorised by a further grant of permission. Reason: To protect the visual amenity of the area
14.	The construction of the development shall be managed in accordance with a Construction and Environmental Management Plan, which shall be submitted to, and agreed in writing with the planning authority prior to commencement of development. This plan shall provide, inter alia: details and location of proposed construction compounds, details of intended construction practice for the development, including hours of working, noise and dust management measures, details of arrangements for routes for construction traffic, parking during the construction phase, and off-site disposal of construction/demolition waste. Reason: In the interests of public safety and residential amenity.

15.	Construction and demolition waste shall be managed in accordance with a construction waste and demolition management plan, which shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. This plan shall be prepared in accordance with the “Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Projects”, published by the Department of the Environment, Heritage and Local Government in July 2006. Reason: In the interest of sustainable waste management.
16.	A plan containing details for the management of waste within the development, including the provision of facilities for the storage, separation and collection of the waste and, in particular, recyclable materials shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. Thereafter, the waste shall be managed in accordance with the agreed plan. Reason: To provide for the appropriate management of waste and, in particular recyclable materials, in the interest of protecting the environment.
17.	The developer shall facilitate the archaeological appraisal of the site and shall provide for the preservation, recording and protection of archaeological materials or features which may exist within the site. In this regard, the developer shall: (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, and (b) employ a suitably-qualified archaeologist prior to the commencement of development. The archaeologist shall assess the site and monitor all site development works. The assessment shall address the following issues: (i) the nature and location of archaeological material on the site, and (ii) the impact of the proposed development on such archaeological material. A report,

	containing the results of the assessment, shall be submitted to the planning authority and, arising from this assessment, the developer shall agree in writing with the planning authority details regarding any further archaeological requirements (including, if necessary, archaeological excavation) prior to commencement of construction works. In default of agreement on any of these requirements, the matter shall be referred to An Coimisiún Pleanála for determination. Reason: In order to conserve the archaeological heritage of the area and to secure the preservation (in-situ or by record) and protection of any archaeological remains that may exist within the site.
18.	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 of roads, footpaths, watermains, drains, 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 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 Bord Pleanála for determination. Reason: To ensure the satisfactory completion of the development.
19.	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 Bord 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 me, directly or indirectly, following my professional assessment and recommendation set out in my report in an improper or inappropriate way.

Lorraine Dockery
Senior Planning Inspector

15th June 2026

Appendix 1- Form 1 - EIA Pre-Screening

Case Reference	PL-501062-LK-26
Proposed Development Summary	Demolition of existing commercial building and construction of multi-storey student accommodation.
Development Address	New Road/Pennywell Road and Old Clare Street, Limerick
	In all cases check box /or leave blank
1. Does the proposed development come within the definition of a 'project' for the purposes of EIA? (For the purposes of the Directive, "Project" means: - The execution of construction works or of other installations or schemes, - Other interventions in the natural surroundings and landscape including those involving the extraction of mineral resources)	☒ Yes, it is a 'Project'. Proceed to Q2. ☐ No, No further action required.
2. Is the proposed development of a CLASS specified in Part 1, Schedule 5 of the Planning and Development Regulations 2001 (as amended)?	
☐ Yes, it is a Class specified in Part 1. EIA is mandatory. No Screening required. EIAR to be requested. Discuss with ADP.	
☒ No, it is not a Class specified in Part 1. Proceed to Q3	
3. Is the proposed development of a CLASS specified in Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) OR a prescribed type of proposed road development under Article 8 of Roads Regulations 1994, AND does it meet/exceed the thresholds?	
☐ No, the development is not of a Class Specified in Part 2, Schedule 5 or a prescribed type of proposed road	

development under Article 8 of the Roads Regulations, 1994. No Screening required.	
☐ Yes, the proposed development is of a Class and meets/exceeds the threshold. EIA is Mandatory. No Screening Required	
☒ Yes, the proposed development is of a Class but is sub-threshold. Preliminary examination required. (Form 2) OR If Schedule 7A information submitted proceed to Q4. (Form 3 Required)	Part 2, Schedule 5, Class 10 (b)(iv) Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere. Class 15: Any project listed in this Part which does not exceed a quantity, area or other limit specified in this Part in respect of the relevant class of development but which would be likely to have significant effects on the environment, having regard to the criteria set out in Schedule 7.

4. Has Schedule 7A information been submitted AND is the development a Class of Development for the purposes of the EIA Directive (as identified in Q3)?	
Yes ☐	Screening Determination required (Complete Form 3)
No ☒	Pre-screening determination conclusion remains as above (Q1 to Q3)

Inspector: Lorraine Dockery **Date:** 15th June 2026

Appendix 2- Form 2 - EIA Preliminary Examination

Case Reference	PL-501062-LK-26
Proposed Development Summary	Demolition of existing commercial building and construction of multi-storey student accommodation and ancillary site works
Development Address	New Road/Pennywell Road and Old Clare Street, Limerick
This preliminary examination should be read with, and in the light of, the rest of the Inspector's Report attached herewith.	
Characteristics of proposed development (In particular, the size, design, cumulation with existing/ proposed development, nature of demolition works, use of natural resources, production of waste, pollution and nuisance, risk of accidents/disasters and to human health).	Proposed development is described in section 2.0 above. The site area of 0.16 ha. The proposed development comprises the demolition of existing structures and boundary walls on site and the construction of a new Purpose-Built Student Accommodation (PBSA) multi-storey scheme and all ancillary site works. Permission is also sought for use of the accommodation, outside of student term time, for short-term letting purposes. The site is located within Limerick city. The development comes forward as a stand-alone project, does not require the use of substantial natural resources, or give rise to significant risk of pollution or nuisance. The development, by virtue of its type, does not pose a risk of major accident and/or disaster, or is vulnerable to climate change.
Location of development (The environmental sensitivity of geographical areas likely to be affected by the development in particular existing and approved land use, abundance/capacity of natural resources, absorption capacity of natural environment e.g. wetland, coastal zones, nature reserves, European sites, densely populated areas, landscapes, sites of historic, cultural or archaeological significance).	This is a brownfield site within an established urban area. The development is removed from sensitive natural habitats and designated sites and landscapes of identified significance in the Development Plan. It is considered that the proposed development would not be likely to have a significant effect, individually or in-combination with other plans and projects, on a European Site.
Types and characteristics of potential impacts (Likely significant effects on environmental parameters, magnitude and spatial extent,	Having regard to the nature of the proposed development, its location removed from sensitive habitats/features, its location, likely limited magnitude and spatial extent of effects, and absence of in-combination effects, there is no potential for significant

nature of impact, transboundary, intensity and complexity, duration, cumulative effects and opportunities for mitigation).	effects on the environment factors listed in section 171A of the Act
Conclusion	
Likelihood of Significant Effects	Conclusion in respect of EIA
There is no real likelihood of significant effects on the environment.	EIA is not required.
There is significant and realistic doubt regarding the likelihood of significant effects on the environment.	
There is a real likelihood of significant effects on the environment.	

Inspector: Lorraine Dockery **Date:** 15th June 2026

Appendix 3: AA Screening Determination

Screening for Appropriate Assessment Test for likely significant effects	
Step 1: Description of the project and local site characteristics	
Brief description of project	See section 2.0 above I have considered the proposed demolition of existing commercial building and construction of multi-storey student accommodation in Limerick city in light of the requirements of S177U of the Planning and Development Act 2000 as amended. A detailed description of the proposed development is presented in Section 2 of my report and detailed specifications of the proposal are provided in the AA Screening Report and other planning documents submitted by the applicant. In summary, the subject site is located within the defined settlement boundary of Limerick city. It has a stated area of 0.16 hectares. The proposed development will be served by public mains connections. SuDS measures are proposed, which are standard measures in all new such developments and are not included to avoid/reduce an effect to a Natura 2000 site. The site is brownfield in nature. The site is not located within a Flood Zone. The application site was surveyed by ecologists with surveys, including bat survey, undertaken at the appropriate time of year and in accordance with standard methodologies.

Brief description of development site characteristics and potential impact mechanisms	Demolition of existing commercial building and construction of multi-storey student accommodation. There are no drains, streams or other water features within or adjacent to the application site. The River Shannon and its associated habitats is located circa 261m north of the site.
Screening report	Y Concluded that the planned project, individually or in combination with other plans/projects, will not result in any significant impacts on the Natura 2000 sites situated in and around Limerick City and therefore an Natura Impact Statement is not required
Natura Impact Statement	N
Relevant submissions	The planning authority have not raised concerns in this regard. The NPWS have not raised concerns in this regard- no report received. This was not raised as a concern by An Coimisiún Pleanála in the previous decision on the site. Third- party submissions do not raise concerns regarding impacts of proposed development on designated sites and their Qualifying Interests.
Step 2. Identification of relevant European sites using the Source-pathway-receptor model	
The proposed development site is not located within any site designated as a European Site, comprising a Special Area of Conservation (SAC) or Special Protection Area (SPA). The nearest designated site is: • Lower River Shannon SAC (Site Code: 002165) to the north of the site circa 261m distant and	

- River Shannon and River Fergus Estuaries SPA (Site Code 004077) circa 600m distant

These are considered to be the only European sites are potentially with a zone of influence of the proposed development.

European Site (Code)	Qualifying interests ¹ Link to conservation objectives (NPWS, date)	Distance from proposed development (km)	Ecological connections ²	Consider further in screening Y/N
Lower River Shannon SAC (Site Code: 002165) <u>Conservation Objective</u> Maintain or restore the favourable conservation condition of the species and habitats listed as QI/SCI for this SAC	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]	300m	N No spatial overlap No pathway from subject site	N The contained nature of the site (defined site boundaries, no direct ecological connections or pathways) and distance from receiving features connected to the SAC make it highly unlikely that the proposed development could generate impacts of a magnitude that could affect habitat quality within the SAC for the QIs listed.

	Salicornia and other annuals colonising mud and sand [1310] Atlantic salt meadows (Glaucopuccinellietalia maritimae) [1330] Mediterranean salt meadows (Juncetalia maritimi) [1410] Water courses of plain to montane levels with the Ranunculion fluitantis and Callitriche-Batrachion vegetation [3260] Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae) [6410] Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) [91E0] Margaritifera margaritifera (Freshwater Pearl Mussel) [1029] Petromyzon marinus (Sea Lamprey) [1095] Lampetra planeri (Brook Lamprey) [1096] Lampetra fluviatilis (River Lamprey) [1099] Salmo salar (Salmon) [1106]			
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	Tursiops truncatus (Common Bottlenose Dolphin) [1349] Lutra lutra (Otter) [1355] <u>Lower River Shannon SAC National Parks & Wildlife Service</u>			
River Shannon and River Fergus Estuaries SPA (Site Code 004077) <u>Conservation Objective</u> Maintain or restore the favourable conservation condition of the species and habitats listed as QI/SCI for this SPA	Cormorant (Phalacrocorax carbo) [A017] Whooper Swan (Cygnus cygnus) [A038] Light-bellied Brent Goose (Branta bernicla hrota) [A046] Shelduck (Tadorna tadorna) [A048] Wigeon (Anas penelope) [A050] Teal (Anas crecca) [A052] Pintail (Anas acuta) [A054] Shoveler (Anas clypeata) [A056] Scaup (Aythya marila) [A062] Ringed Plover (Charadrius hiaticula) [A137] Golden Plover (Pluvialis apricaria) [A140]	600m	N No spatial overlap No pathway from subject site	N The contained nature of the site (defined site boundaries, no direct ecological connections or pathways) and distance from receiving features connected to the SPA make it highly unlikely that the proposed development could generate impacts of a magnitude that could affect habitat quality within the SPA for the QIs listed.

	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] Wetland and Waterbirds [A999] <u>River Shannon and River Fergus Estuaries SPA National Parks & Wildlife Service</u>			
Step 3. Describe the likely effects of the project (if any, alone <u>or</u> in combination) on European Sites				
Site name	Possibility of significant effects (alone) in view of the conservation objectives of the site*			

Qualifying interests			
		Impacts	Effects
Lower Shannon (Site 002165)	River SAC Code:	Direct: None. No risk of habitat loss, fragmentation or any other direct impact Indirect: None. No hydrological pathways	The project is not directly connected with or necessary to the management of this European Site. Possibility of significant effects can be ruled out without further analysis and assessment.
River Shannon and River Fergus Estuaries (Site 004077)	SPA Code	Direct: None. No risk of habitat loss, fragmentation or any other direct impact Indirect: None. No hydrological pathways	The project is not directly connected with or necessary to the management of this European Site. Possibility of significant effects can be ruled out without further analysis and assessment.
		Likelihood of significant effects from proposed development (alone): N	
		If No, is there likelihood of significant effects occurring in combination with other plans or projects?	
		Possibility of significant effects (alone) in view of the conservation objectives of the site*	
Further Commentary / discussion			
I am satisfied that adequate information is provided in respect of the baseline conditions, potential impacts are clearly identified, and sound scientific information and knowledge was used. The information contained within the submitted reports is considered sufficient to allow me to undertake an			

Appropriate Assessment screening of the proposed development. The screening is supported by associated reports, including ecological field surveys involving habitat survey and mapping, bird surveys, bat surveys and Construction and Environmental Management Plan.

I do not consider that any other European Sites fall within the zone of influence of the project, based on a combination of factors including the intervening distances, the lack of suitable habitat for qualifying interests, and the lack of hydrological or other connections. No reliance on avoidance measures or any form of mitigation is required in reaching this conclusion.

Invasive Species

None identified

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

Based on the information provided in the screening report, site visit, review of the conservation objectives and supporting documents, I consider that in the absence of mitigation measures beyond best practice construction methods, the proposed development does not have the potential to result in significant effects on **Lower River Shannon SAC (Site Code: 002165) and River Shannon and River Fergus Estuaries SPA (Site Code 004077)**.

I therefore consider that it is possible to exclude the possibility that proposed development alone would result significant effects on **Lower River Shannon SAC (Site Code: 002165) and River Shannon and River Fergus Estuaries SPA (Site Code 004077)**. An appropriate assessment is not required on the basis of the possible effects of the project. Further assessment of in-combination with other plans and projects is not required at screening stage.

Screening Determination

Finding of likely significant effects

In accordance with Section 177U of the Planning and Development Act 2000 (as amended) and on the basis of objective information provided by the applicant, I conclude that the proposed development would not result in significant effects on the **Lower River Shannon SAC (Site Code: 002165) and River Shannon and River Fergus Estuaries SPA (Site Code 004077)** in view of the conservation objectives of a number of qualifying interest features of these sites.

It is therefore determined that Appropriate Assessment (Stage 2) under Section 177V of the Planning and Development Act 2000 of the proposed development is not required.

Inspector: Lorraine Dockery

Date: 15th June 2026

Appendix 4- WFD Screening			
Step 1: Nature of the Project, the Site and Locality			
An Bord Pleanála ref. no.	PL-501062-LK-26	Townland Address	New Road/Pennywell Road and Old Clare Street, Limerick
Description of project		Demolition of existing commercial building and construction of multi-storey student accommodation and ancillary site works	
Brief site description, relevant to WFD Screening,		Site is located within the settlement boundary of Limerick city on a brownfield site.	
Proposed surface water details		SuDS measures proposed	
Proposed water supply source & available capacity		New connection to public mains	
Proposed wastewater treatment system & available capacity, other issues		New connection to public infrastructure	
Others?			

Step 2: Identification of relevant water bodies and Step 3: S-P-R connection

Identified water body	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) (Consider all phases)	Mitigation Measures proposed	Is mitigation sufficient? Will there be any residual impacts?
River	SHANNON (LOWER)_060 IE_SH_25S012600	Moderate	Review	None	Surface run-off, drainage.	Standard mitigation measures included in CEMP by condition	Mitigation sufficient. No residual impacts predicted.
Groundwater	Limerick City East IE_SH_G_138	Good	At Risk	Ag, DWTS	Potential for stormwater discharges to groundwater	Standard mitigation measures included in CEMP by condition	Mitigation sufficient. No residual impacts predicted.

Inspector: Lorraine Dockery **Date:** 15th June 2026