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**LARGE RESIDENTIAL
DEVELOPMENT
CORRESPONDENCE FORM**

Appeal No: ACP 324 286-26Please treat correspondence received on 12/6/26 18/6/26 *email* as follows:

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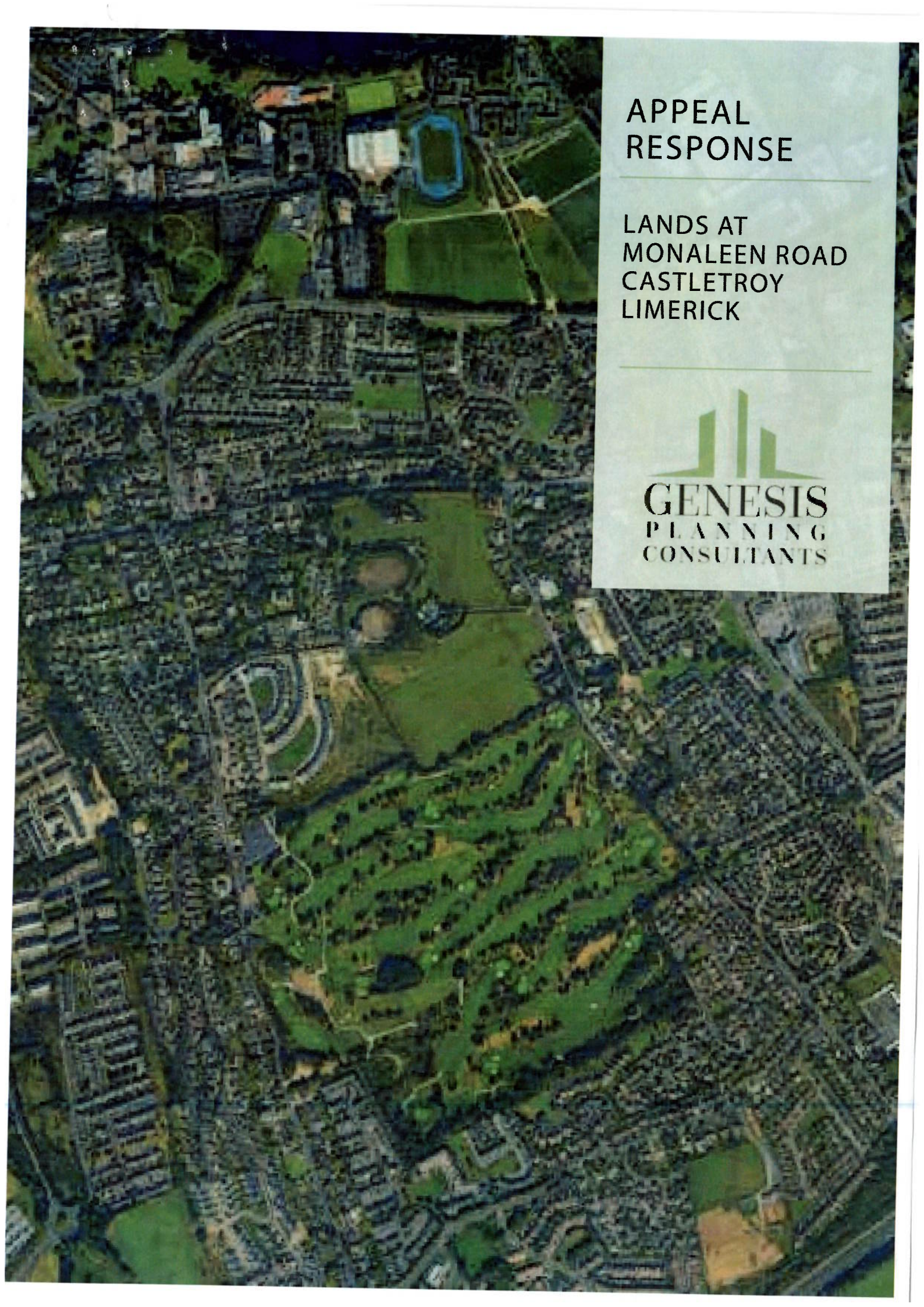
Amendments/Comments

*applicants response to 2nd 3rd & 4th appeals***4. Attach to file**(a) SHD/LRD Unit ☐(b) Inspector ☒RETURN TO EO ☐Plans Date Stamped ☐Date Stamped Filled in ☐EO: *Dave* *by* *all*

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APPEAL RESPONSE

LANDS AT
MONALEEN ROAD
CASTLETROY
LIMERICK



GENESIS
PLANNING
CONSULTANTS

APPEAL RESPONSE

LRD Residential Development for lands at
Monaleen Road, Castletroy

PREPARED BY:
Genesis Planning
Planning and Urban Design

ON BEHALF OF:
Columbia Estates Management Limited

Appeal reference 324286-26

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01 Introduction & background

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01 Background

1.1 Overview

1.1.1 Limerick City County Council issued a notification of it's decision to grant permission for the proposal on 28th April 2026, subject to 27no. conditions (LCC Reg. Ref. 2660241 refers). An Coimisiún will be aware that the applicant has not appealed any of the conditions in this case.

1.1.2 In overall terms having regard the respective third party appeals we note they comprise a number of statements that are entirely unsupported by any evidence, or reference to material on file or to the decision of the Planning Authority in this case.

1.1.3 In this context we request that An Coimisiún upholds the decision of the Planning Authority to grant permission for the development, in order to allow this important development to proceed which will provide for delivery of housing units and crèche to meet local demand.

1.1.4 For conciseness detailed background information relating to the proposed development and relevant to this appeal response, including site and development descriptions and planning policy context, is provided in the application particulars submitted to LCC at application stage.

1.1.5 Also relevant to the project background as a LRD project we highlight the development proposal has been designed to address matters raised by the Planning Authority during the course of the LRD pre-application discussions. For conciseness and to assist An Coimisiún this report should be read in conjunction with the application particulars as follows:

Application particulars

- Application Form & Statutory Notices;
- Part V Proposals;
- Statement on Housing Mix by Genesis Planning;
- Building Lifecycle Report by Arnold Leahy Architects & Genesis Planning;
- Schools, Childcare & Social Infrastructure Assessment by Genesis Planning;
- Architectural Drawings prepared by Arnold Leahy Architects;
- Housing Quality Assessment by Arnold Leahy Architects;
- Outline Construction Management Plan by Garland Consulting Engineers;
- Resource Waste Management Plan by Genesis Planning;
- Design Statement prepared by Genesis Planning;
- Statement of Response by Genesis Planning;
- Noise Assessment by AWNI;
- Engineering Services reports & drawings prepared by Garland Consulting Engineers;
- Letter of feasibility from Irish Water;
- DMURS Design Audit by Genesis Planning & Arnold Leahy Architects;
- Traffic & Transport Assessment and RSA prepared by Road Plan;
- Appropriate Assessment Screening and Natura Impact Statement by JBA;
- EIAR by the project team;
- Landscaping Proposals prepared by CSR;
- Daylight Analysis by Digital Dimensions;
- Street Lighting proposals by Molloy Consulting Engineers;
- Project CGI's and Montages.

1.1.6 For conciseness we highlight the Planning Authority are satisfied on all development management criteria set out in both the Limerick City and County Development Plan (CDP) and the wider strategic policy and planning context, including the relevant Section 28 Guidelines. Key criteria on which all matters are deemed acceptable are summarised below:

- Zoning;
- Design rationale of the scheme;
- Plot Ratio & Site Coverage;
- Building design & site layout;
- Building Heights;
- Masterplan proposals;
- Parking and Access proposals;
- Landscaping proposals;
- Ecology;
- Archaeology;
- Waste Management;
- Site services;
- Urban Design and site works;
- SUDS Strategy & Wastewater;
- EIA Directive;
- Noise;
- Water Framework Directive;
- Climate Action Plan;
- Habitats Directive.

1.1.7 For ease of reference by An Coimisiún we enclose an electronic copy of all application documents to accompany this appeal response which are available on the LRD website:

www.monaleenroadlrd.com

1.1.8 We trust that An Coimisiún will have full regard to the extensive suite of material lodged with the planning application for this project.

1.1.9 We highlight also that the project design has been informed by Section 247 pre-planning discussions and Formal LRD discussions all of which are addressed in the proposal. While it is acknowledged that there are significant volumes of material in the planning application it is not considered helpful to re-iterate much of same under this appeal response as we note An Coimisiún will be considering this appeal in it's entirety de novo.

1.1.10 Furthermore we take this opportunity to state the strategic importance of the site has been fully appreciated by the design team at all stages of the planning process and the proposal represents the optimum design proposal for the site.

1.2 Decision of the Planning Authority

1.2.1 We highlight the notification to grant permission by the Planning Authority is subject to 35 conditions. Of note no amendments are sought by these conditions, except for condition no.4 which restricts the duration of the permission to 5 years.

1.2.2 Accordingly all design proposals and particulars supporting the application are to the satisfaction of the Planning Authority.

1.3 Pre-planning Discussions

1.3.1 Section 247 pre-planning discussions were held with the Planning Authority on 29th May 2025 and 9th October 2025 pursuant to the requirements of the 2021 Act.

1.3.2 In response the project team took on-board comments from the Planning Authority and reviewed the layout and design options to find the optimum design response as now proposed.

1.3.3 Specifically the design proposals attached are considered to be an appropriate balance between density requirements and ensuring appropriate design specifics being proposed which are now considered to provide for a high-quality residential environment.

1.3.4 The design now under consideration by An Coimisiún incorporates in summary:

- Net site density proposals of 53.9 units per hectare;
- Overall residential unit numbers of 523no. proposed;
- A variety of residential types to include apartments and duplex units;
- A variety of building typologies, heights and finishes to ensure a high quality residential environment is provided;
- A DMURS compliant road layout;
- A scheme that responds to it's locational context;
- Prioritisation of pedestrian and cyclist movement within the scheme, promoting active travel and reducing car dependency.
- Adequate setbacks from the R445 to allow for an effective acoustic buffer.
- A scheme which responds to it's locational context in terms of density and scale, making the best and most efficient use of the land and the opportunities which it presents.

1.3.5 To assist An Coimisiún in terms of project background the table opposite summarises the matters raised by the Planning Authority during pre-planning consultations.

Item	Summary
Principle of Development	Acceptable (residential and crèche).
Density	53.9p/ha; Acceptable. Site is to be regarded as an intermediate urban location as per the Compact Settlement Guidelines and this sets the context for density and parking.
Public Open Space	Public Open Space in excess of 15% is proposed. All public open space is required to be useable, therefore details to confirm the usability of proposed public open space should be submitted with any application. The applicant should also consider Policy and Objective 5.1 of the Sustainable Dev & Compact Growth Guidelines in the provision of public open space. Ensure open space is incorporated into each phase. Also ensure open space is provided in walking distance to each residential unit. Open space calculations to be detailed in the application particulars.
Private Open Space	Private open space provision as per SPPR 2 in Sustainable Dev & Compact Growth Guidelines is required.
Communal Space	To be provided as per Apartment Guideline requirements.
Layout	Design and layout to be in accordance with the Compact Settlement Guidelines and Apartment Guidelines and Urban Design Manual.
SUDS	Design to be in accordance with SUDS requirements.
Lighting	Full lighting design proposals required, to include consideration of bats.
Traffic	TTA, RSA and MMP required. Junction analysis demonstrates a signalised junction is not required.
Transportation	DMURS principals to be incorporated. Set-back from Monaleen Road of 3metres to allow for active travel. Mobility Management Plan to be included.
Parking provision	Given the location and high frequency bus route a reduction in car parking provision should be considered. 10% EV parking space provision. Provision of disabled spaces, car club spaces.
Bicycle provision	Apartments: 480, Visitors:161, Crèche: 10 Total 651 (dwellings in-curtilage). Mixture of storage types required, along with covered provision for crèche, cargo bikes and secure.
Flood Risk	Not in an area of flooding.
Ecology	AA Screening and NIS for application. ECIA to be incorporated into the EIAR.

Table 1 Summary of Section 247 and Formal LRD discussions

01 Background

1.4 Planning statistics

1.4.1 A summary overview of the key planning statistics for the proposed development is set out below in tabular format. Also a detailed Housing Quality Assessment is provided under separate cover.

Net Site Area	9.7 ha
Density (units per ha)	53.9p/ha
Height	2-5 storey buildings
Public Open Space	15.9% (15,448sq.m)
Communal Space	4486sq.m vs 1863sq.m required
Parking provision	648 spaces (CDP has a maximum provision of 706 spaces)
Bicycle provision	Apartments: 468, Visitors: 155, Crèche: 10 Total: 633 (dwellings in-curtilage)
One bed units	159 (30.4%)
Two bed units	151 (28.9%)
Three bed units	213 (40.7%)
Apartment Unit Dual Aspect	240no. (74%)
Apartment Units achieving 10% uplift in sizes	All Apartment units achieve 10% uplift in line with Apartment Guidelines

Table 2 Summary of site statistics

1.5 Planning history

1.5.1 We have reviewed the Planning Register and note the relevant planning history on the site. Most recently permission was granted under 117018 for alterations to the parent permission 042264 which provided for a total of 195no. houses, 61no. apartments and 41no. duplex units.

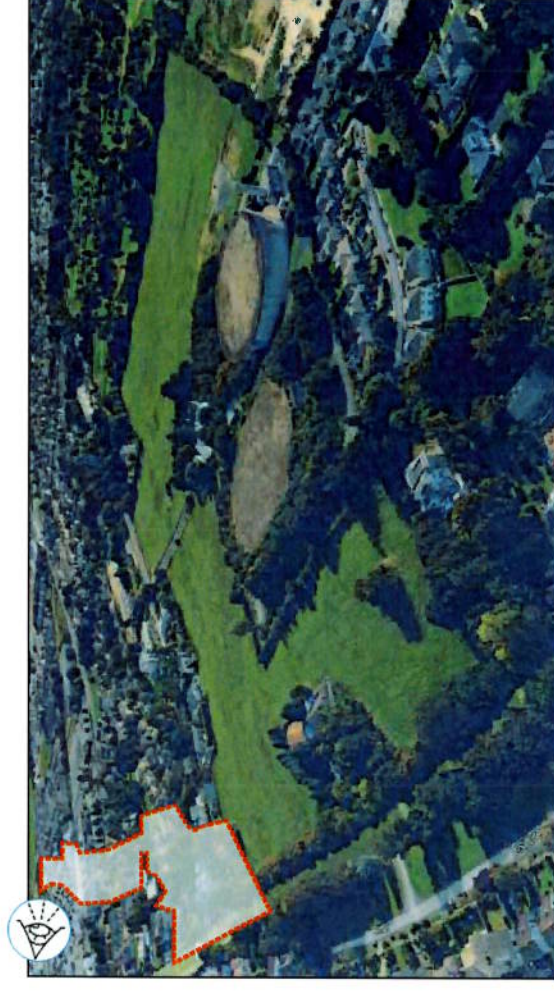
Reference Number	01871
Applicant Name	Breda Sutton
Development	Construction of 274 residential units & crèche
Decision	Conditional 14/01/2002
Reference Number	042264
Applicant Name	Michael Sutton
Development Description (summary)	construction of 195 no. houses, 61 no. apartments, 41 duplex units and crèche together with landscaping, drainage works and associated ancillary items and site works
Decision	Conditional 07/09/2005
Reference Number	071798
Applicant Name	Bellisle Properties Ltd
Development Description (summary)	alterations to planning permission ref. no. 04/2264. The alterations shall include: the conversion of 10 no. detached units, 38 no. semi-detached units, 79 no. terraced units, 27 no. duplex apartments over 27 no. apartments, and 6 no. apartments (total 187 no. units) to 27 no. detached houses, 36 no. semi-detached, 58 no. terraced houses and 60 no. apartments and 5 no. serviced sites (total 186 no. units); alterations to the road layout; alterations to the boundary wall fronting Monaleen Road; alterations to the entrance layout and elevation; alterations to landscaping; the construction of an entrance chalet; and all associated site works at Monaleen Road, Castletroy, Co. Limerick
Decision	Conditional 05/02/2008
Reference Number	09597
Applicant Name	Bellisle Properties Ltd.
Development Description (summary)	alterations to planning ref. no. 04/2264. The alterations include: the redesign and relocation of the proposed crèche; the redesign and relocation of 3 no. terraced townhouses previously numbered 64C, 65C & 66C; the replacement of 1 no. detached dwelling, 81 no. terraced townhouses and 15 no. apartments with 16 no. serviced sites with a detached dwelling house on proposed site no. 9 of this application; alterations to the roads layout; alterations to landscaping and all associated site works. Planning permission is further sought for alterations to planning permission ref. no. 07/1798. These alterations include: the replacement of 1 no. serviced site previously numbered 5 and 4 no. semi-detached houses previously numbered 119-122 with 4 no. detached houses
Decision	Conditional 13/11/2009
Reference Number	117018
Applicant Name	Gearoid Costelloe
Development Description (summary)	alterations to planning permission ref. no. 04/2264. The alterations shall include: the conversion of 10 no. detached units, 38 no. semi-detached units, 79 no. terraced units, 27 no. duplex apartments over 27 no. apartments, and 6 no. apartments (total 187 no. units) to 27 no. detached houses, 36 no. semi-detached, 58 no. terraced houses and 60 no. apartments and 5 no. serviced sites (total 186 no. units); alterations to the road layout; alterations to the boundary wall fronting Monaleen Road; alterations to the entrance layout and elevation; alterations to landscaping; the construction of an entrance chalet; and all associated site works
Decision	Conditional 10/05/2011

Table 3 Summary of planning history

01 Background

1.6 Site location & description

- 1.6.1 The subject site is located on Monaleen Road in the Castletroy area of Limerick. It is strategically positioned with the R445 regional road forming its northern boundary and the Castletroy Golf Club situated directly to the south.
- 1.6.2 In terms of the site itself it comprises a greenfield parcel of lands measuring 9.7 hectares.
- 1.6.3 In terms of access a new vehicular entrance to the site will be established from Monaleen Road, providing convenient connectivity. In addition, a dedicated pedestrian access point is proposed from the R445 on the northern boundary to support active travel.
- 1.6.4 Foul sewer and mains water infrastructure services are also existing along the local road with existing capacity to service the site.
- 1.6.5 The site itself is characterised by open and flat farm land with hedgerows along the perimeter.
- 1.6.6 The surrounding area is characterised by a suburban development pattern, with typical densities and built form reflective of residential neighbourhoods in the wider Castletroy area, as outlined below.



01 Background

1.7 Evolution of Design



Consented under previous permission 117018

1.7.1 The layout above was a previous iteration of the development from the 2011 permission, now expired. This layout was reviewed by the design team and key matters to be addressed identified as:

- 297 units as per the previous scheme would not achieve compliance with current CDP in terms of minimum density requirements. (density of 30.6 units/ha)
- Not DMURS compliant in that it was a road dominated layout and way-finding did not encourage permeability.
- No crèche provision.
- Serviced sites not an efficient use of zoned lands.
- Larger unit typology inappropriate to the 2025 policy context
- Over-provision of cul-de-sacs.
- Inadequate open space provision.

1.7 Evolution of Design



Formal LRD proposals- October 2025

- 1.7.2 A number of revisions were made to the proposal by the design team. The amended proposal which formed the basis for Formal LRD discussions included for:
- 504 Residential Units.
 - A revised unit mix for Apartments in light of the 2025 Apartment Guidelines.
 - Proposed Part V units informed by preliminary discussions with the Housing Section of LCC.
 - An increase in density from 50.8 p/ha to 51.3 units p/ha.
 - Provision of central parks, pocket parks, and a linear green route enhance amenity, biodiversity, and neighbourhood connectivity.
 - A crèche at site entrance onto Monaleen Road.
 - Diverse mix of houses, duplexes, and apartments with varied building heights (2-5 storeys) reinforces character and place.
 - Vehicular access via Monaleen Road, with pedestrian access onto the Dublin Road.
 - Generous public open space provision in excess of 15%, and communal space requirements also met.
 - A DMURS compliant design.
 - Active frontages ensure well-overlooked, safe, and lively streets and open spaces.
 - Site design now better reflects local context and scale.
 - SuDS integrated to manage surface water sustainably.
 - Pedestrian and cycle-friendly layout encourages active travel and reduces car reliance.
 - Site layout responds to local topography, surrounding context, and protected ecological features.
 - Permeable layout with pedestrian/cycle links encourages active travel and supports future public transport connectivity.
 - Links to adjacent lands provided for.

01 Background

1.8 LRD Proposals under Appeal

1.8.1 The planning rationale is to create a high quality residential development which enhances the environment and provides for a residential scheme appropriate to it's context.

1.8.2 Taking into account LRD pre-planning discussions the overarching concept for the design is therefore to achieve:

- Net residential density of 53.9p/ha meets policy for sustainable suburban growth.
- Interlinked open spaces and pocket parks, tree lined avenues and provision of same across the site to encourage usability for all residents.
- Crèche at the entrance serves as a community hub and key landmark.
- A mix of 2-5-storey buildings to create a strong sense of place; landmark buildings and create a new be-spoke residential scheme appropriate to the site.
- Responding to site contours.
- Positioning the taller buildings at the lower environs of the site.
- Responding to wayleaves that traverse the site for Irish Water infrastructure.
- Clear, DMURS-compliant road hierarchy with traffic-calming supports safe, intuitive movement.
- Active frontages overlook streets and parks, ensuring lively, secure public realms.
- Setbacks along the R445 provide effective acoustic buffering
- Achieving in excess of 15 % public open space, plus communal areas for apartments.
- A design that responds to local topography and context.
- SUDS infrastructure.
- Pedestrian and cycle priority ensured through direct routes, permeability links and secure bike storage.
- Permeability to adjacent lands to the west.
- Cognisance given to adjacent dwellings; and restricting building heights to 2 storeys where the site backs onto residential curtilages.

1.8.3 Further particulars on the design rationale are set out in the accompanying Design Statement.

MASTERPLAN GENERAL NOTES: 523 units	
Planning Site Area = 9.84 ha.	
Ownership Area = 9.70 ha.	
Net Residential Area = 9.70 ha.	
Proposed 523 no. Units Density = 53.9 units / ha.	
<u>214no. Houses</u>	204no. 3 bed Houses 10no. 2 bed Houses
<u>309no. Apartments</u>	159no. 1 bed apartments 141no. 2 bed apartments 9no. 3 bed apartments



01 Background

1.9 Duration of Permission

1.9.1 As An Coimisiún will note a 10 year permission was applied for (refer to project description). Section 41 of the Planning and Development Act 2000 (as amended) states:

"41.—Without prejudice to the powers conferred on them by this Part to grant a permission to develop land for a limited period only, in deciding to grant a permission under section 34, 37, 37G or 37N, a planning authority or the Board, as may be appropriate, may, having regard to the nature and extent of the relevant development and any other material consideration, specify the period, being a period of more than 5 years, during which the permission is to have effect, and in case the planning authority or the Board exercises, or refuses to exercise, the power conferred on it by this section, the exercise or refusal shall be regarded as forming part of the relevant decision of the authority or the Board under section 34, 37, 37G or 37N."

1.9.2 Accordingly under the provisions of Section 41 permission with a duration of 10 years is sought in this case.

1.9.3 We highlight the 10 year permission period allows for fluctuations in development output (i.e. construction of units) on a yearly basis to respond to potential changes in the construction market and the phased delivery of the necessary supporting infrastructure.

1.9.4 In terms of construction programme post planning consent being granted the phasing plan opposite and the accompanying construction programme set out the timeframe required to deliver each phase. As can be noted the project is proposed for delivery in 5 phases, which is reasonable for a development of this scale. Also prior to commencement a time period will be required for legal with potential occupants, construction drawings, tender and contractor appointment along with planning compliance matters, amongst general obligations to be met. Given the scale of the project a standard 5 year permission is a restrictive period and not realistic to deliver an overall quantum of 523 residential units, a crèche and all associated site works. We also note condition 4 of the Planning Authority's decision has restricted the duration of permission to 5 years.

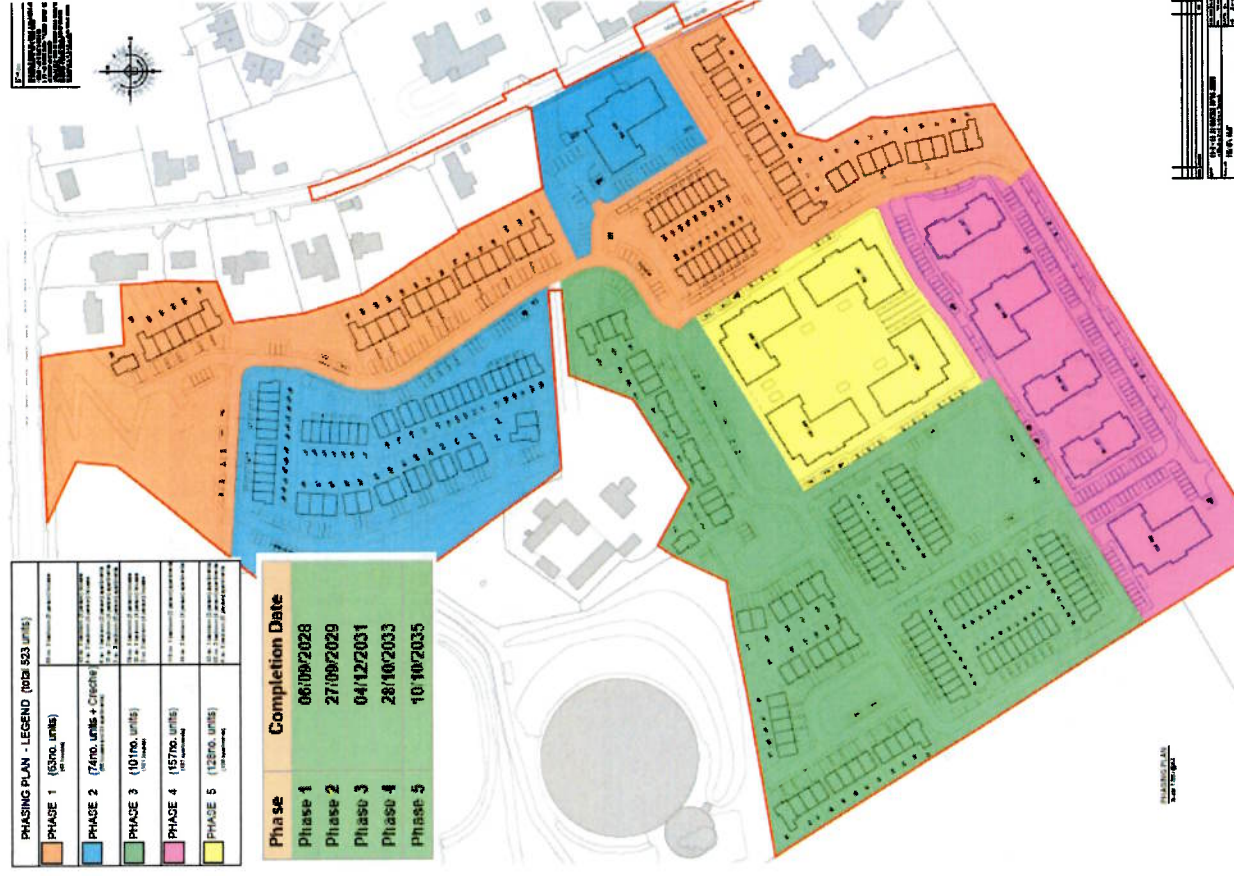
1.9.5 For the purposes of this appeal now under consideration to demonstrate why a 10 year permission is justified we refer to the accompanying Construction Programme; enclosed under separate cover.

1.9.6 Also we highlight for An Coimisiún a further reason for seeking a 10 year duration of permission is due to legislation under Section 42 of the Planning & Development Act 2000 (as amended) wherein further restrictions have been put in place regarding the extension of duration of any permission which requires an Environmental Impact Assessment or Appropriate Assessment.

1.9.7 On review of the legislation as per the 'European Union (Planning) (Habitats, Birds and Environmental Impact) Regulations 2021 (S.I. No. 456 of 2021), reg. 2(a)(ii) it is to be noted that for this scale of development which involves both an Environmental Impact Assessment and an Appropriate Assessment there is no basis for an extension of duration of permission to be granted.

1.9.8 Therefore in terms of the duration of the permission (and the requirements for EIA and NIS for the project) this raises a very significant risk to a project of this scale and hence it is both prudent and appropriate to seek a duration of permission during which the applicant can be comfortable the development can be completed.

1.9.9 For the reasons set out above we submit a 10 year permission period is considered appropriate to cover factors which may arise and which would be beyond the control of the applicant (and the Planning Authority) such as an unforeseen global conflict or a repeat of the Covid pandemic, either of which would be macroeconomic factors that should be allowed for in any construction programme and the duration of planning permissions.





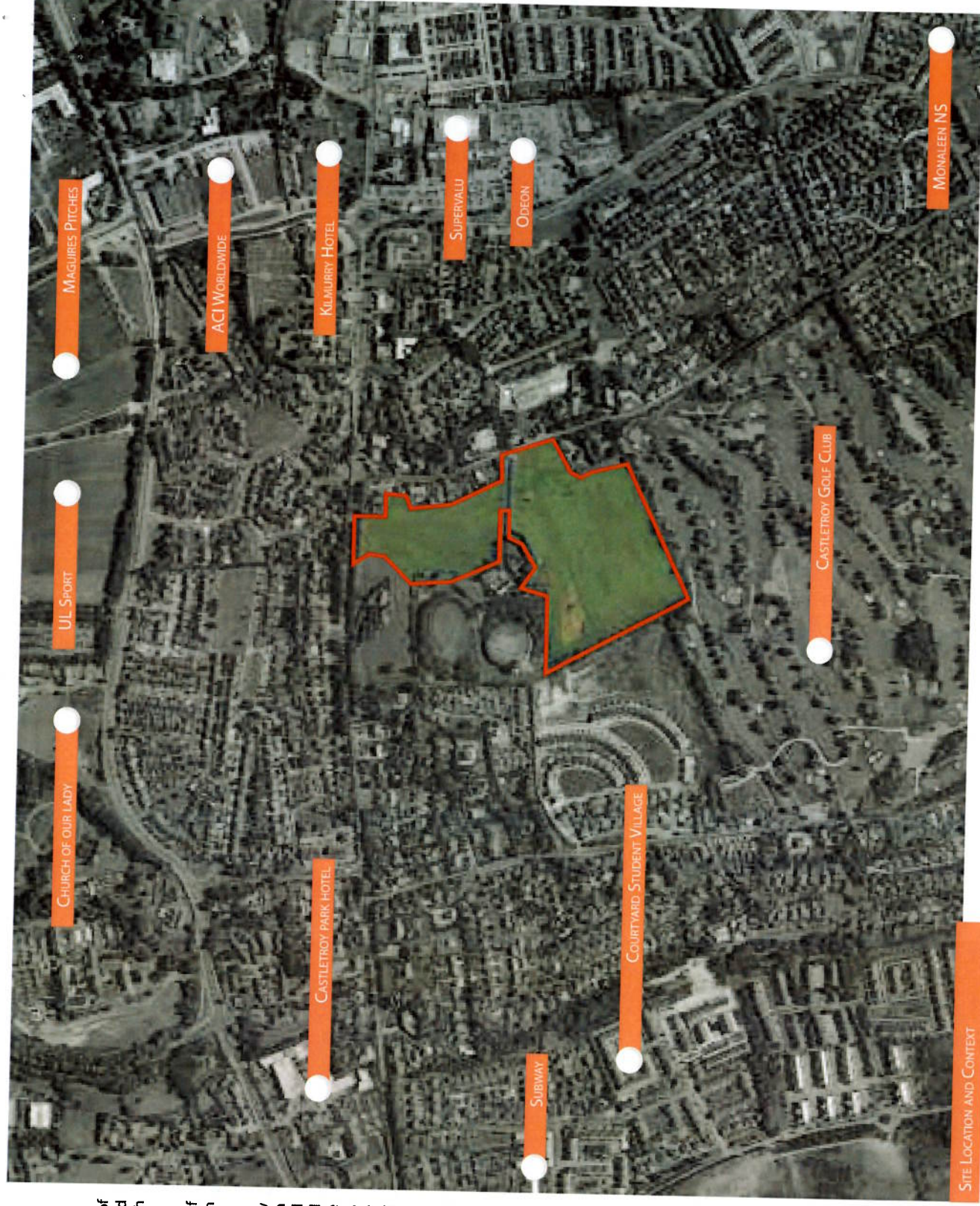
02 | Local Context

2.1	Site location
2.2	Locational context
2.3	Site Location: Local & Existing Context
2.4	Local socio-economic context
2.5	Rationale for the proposal
2.6	Social & community infrastructure
2.7	Schools and childcare

02 Local Context

2.1 Site location

- 2.1.1 The site is located in the Castletroy area of Limerick City. It is bounded by Monaleen Road to the east, Dublin Road (R445) to the north and Castletroy Golf Club to the south.
- 2.1.2 The site comprises a greenfield parcel of agricultural lands measuring 9.7 hectares in total.
- 2.1.3 Access to the site will be provided via a new entrance from Monaleen Road. This location was selected due to level differences and mature tree cover and also the planned Bus Corridor along Dublin Road, which are constraints to vehicular access. Foul sewer, mains water, and ESB infrastructure are available along Monaleen Road, with capacity to service the development.
- 2.1.4 The site benefits from its position within an established residential area and is readily accessible.
- 2.1.5 Existing bus services run along R445 Road, and pedestrian connections to local facilities will be enhanced through integrated footpaths and safe crossing points.
- 2.1.6 The development connects to existing footpaths along Monaleen Road and provides an internal network of pedestrian routes, promoting walkability.
- 2.1.7 Adjoining uses include residential developments and agricultural lands.



02 Local Context

2.2 Locational context

2.2.1 Limerick City is the largest urban centre in Ireland's Mid-West and the country's third largest city. In terms of local demographic context, the population of Limerick City and Suburbs 94,192 which is the third largest in Ireland, and is an economic hub for the southern region. There are a large number of multi-national companies across a range of sectors and in conjunction with the economic growth of the town there has been a steady increase in the local population.

2.2.2 According to the NPF Limerick City and Metropolitan Area is:

'a well-located regional centre situated mid-way between Cork and Galway on Ireland's Atlantic Economic Corridor and with good connectivity to Dublin. Limerick has the potential to generate and be the focus of significant employment and housing growth.

2.2.3 In respect of the its aims the NPF also seeks to develop this area in a balanced manner between employment and residential wherein it states:

'It is necessary for Limerick to further strengthen its position as the principal focus within the Region and to continue to address the legacy of regional growth having occurred outside the City area.'

2.2.4 Further we note it is a National Policy Objective to:

'prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location' (p.93).

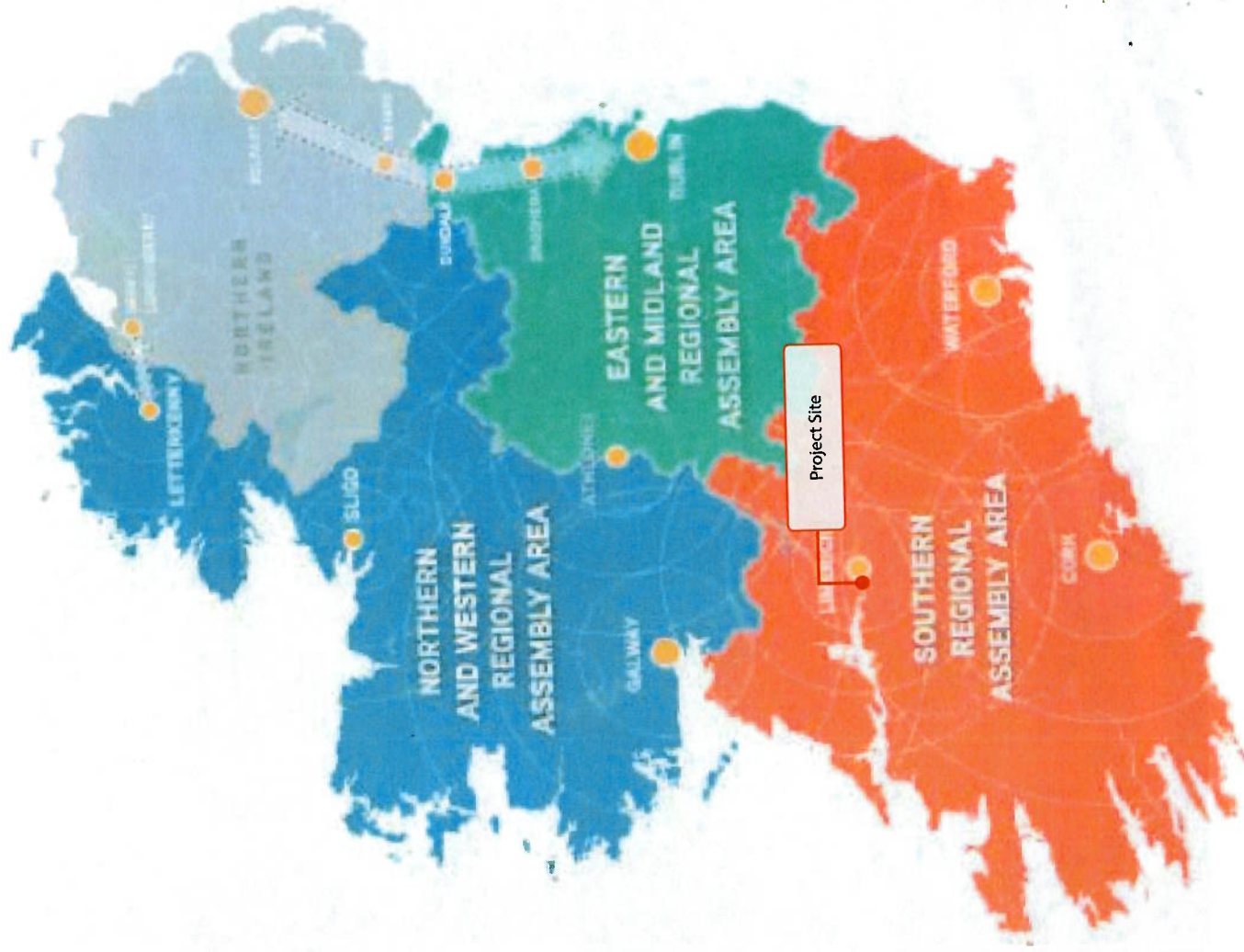
2.2.5 Also the NPF recognises such pressures wherein it states:

'There is a need to encourage population growth in towns of all sizes that are strong employment and service centres, where potential for sustainable growth exists, also supported by employment growth' (pg.60)

2.2.6 In this context the provision of appropriate residential accommodation in the right location is critical to maintaining Limerick's competitiveness and attracting further growth in investment and jobs.

2.2.7 Given the proximate location of the site to areas zoned for employment purposes the proposed development will offer much needed housing for the area.

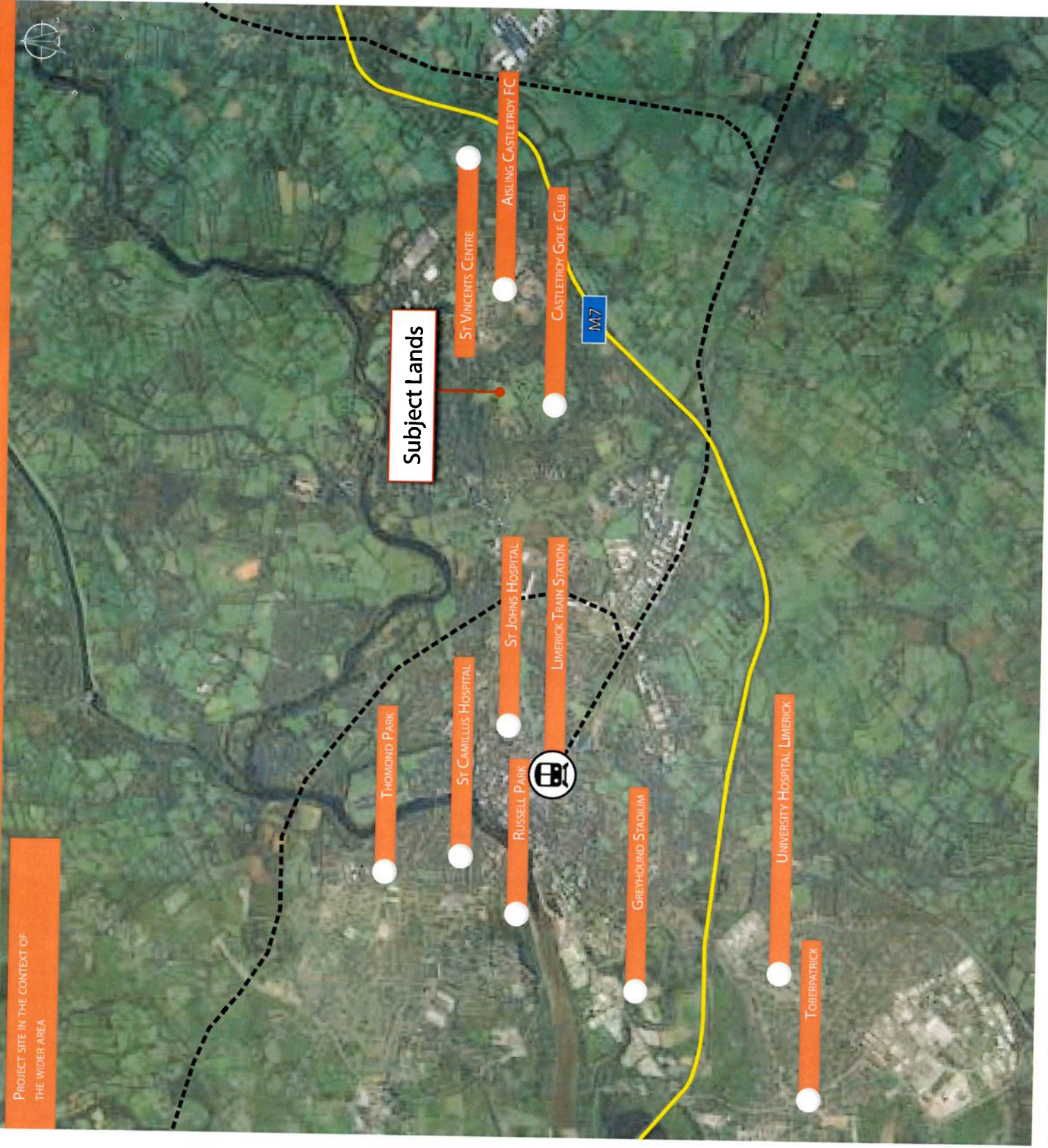
2.2.8 Accordingly we submit this clearly demonstrates that there is demand for additional residential units in the area which needs to be provided for in conjunction with increasing employment generation.



02 Local Context

2.3 Site Location: Local & Existing Context

- 2.3.1 The site is accessed via Monaleen Road and is highly accessible. It's location within an established urban area supports sustainable travel patterns.
- 2.3.2 Footpaths and on-street cycle routes in the surrounding area connect the site to Dublin Road and the wider Limerick environs.
- 2.3.3 The site is immediately bordered by Monaleen Road, Dublin Road and Castletroy Golf Club.
- 2.3.4 Surrounding land uses include residential developments, utility infrastructure and greenfield lands.



02 Local Context

2.4 Local socio-economic context

2.4.1 Limerick City is the largest urban centre in Ireland's Mid-West and the country's third largest city. In terms of local demographic context the population of Limerick City and Suburbs is 94,192 which is the third largest in Ireland. There are a large number of multi-national companies across a range of sectors and in conjunction with the economic growth of the City there has been a steady increase in the local population.

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2.4.5 In this context the provision of appropriate residential accommodation in the right location is critical to maintaining Limerick and Suburbs competitiveness and attracting further growth in investment and jobs.

2.4.6 Given the proximate location of the site to areas zoned for employment purposes and its commuter distance to Limerick City the proposed development will offer accommodation in Castletroy that is needed and currently not available.

2.4.7 In terms of population growth in recent years on review of CSO data it is found that Ballysimon ED population increased by 21.7% from 2016-2022, and County Limerick experienced a similar increase of 7.5% in this period.

2.4.8 This growth in population is resulting in a significant and unfulfilled housing demand for the City as a whole, and in particular the Ballysimon ED area given its strategic location adjacent to major employers at the eastern margins of Limerick.

2.4.9 In this context we submit this clearly demonstrates there is demand for additional residential units in the area which needs to be provided for in conjunction with increasing employment generation.

Population change

2.4.10 To provide an overview in terms of local population change and demand for housing this section provides a brief outline of the population growth of the State, the Greater Dublin Area (GDA), Co Limerick, Ballysimon ED according to the CSO census data.

2.4.11 As can be noted from table 3 below the population of County Limerick grew by 7.5% between 2016 and 2022. Also Ballysimon has grown substantially between 2016-2022, from 13590 in 2016 to 16540 in 2022, representing a population increase of 21.7%.

2.4.12 On this basis the population growth experienced both at County Level, and at a local level in Ballysimon ED (21.7%) are marginally below the trend in the growth in the state (8.1%) and the GDA (9.2%) during the same period.

Census Year	State	Greater Dublin Area	Co. Limerick	Ballysimon ED
2016	4,761,860	1,907,332	194899	13590
2022	5,149,139	2,082,605	209536	16540
% Change	8.1%	9.2%	7.5%	21.7%

Table 4 Population change of the State, the Greater Dublin Area, Limerick and Ballysimon ED between 2016 and 2022 as derived from the CSO statistics

02 Local Context

2.4 Local socio-economic context (contd.)

Housing market

2.4.13 As the Planning Authority will note the housing market in Limerick has shown significant growth in recent years, influenced by it's own population, economic growth and also by the overall demands being exerted for housing units.

2.4.14 On review we consider it is reasonable to assume this represents the natural growth of Limerick's population and the ongoing demand to live within the City environs.

2.4.15 Also as is evident in relevant publications and statistics there remains significant pressure on the housing market in the Metropolitan area.

2.4.16 However on review of CSO data for new dwelling completions it is noted that units constructed in recent years within County Limerick still remains low, particularly for apartment unit provision as shown below which captures housing delivery since the CDP was adopted.

Limerick	2022 Q2	2022 Q3	2022 Q4	2023 Q1	2023 Q2	2023 Q3	2023 Q4	2024 Q1	2024 Q2	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3
Single House	54	59	60	36	57	44	58	60	50	72	49	40	80	79
Scheme House	121	128	148	109	90	107	137	121	130	181	148	108	133	124
Apartment	37	5	3	60	2	46	48	17	46	112	42	30	12	32

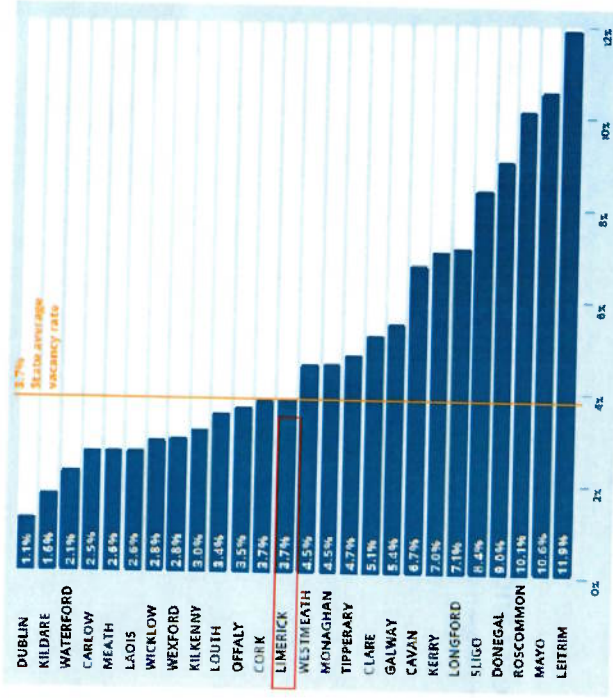
Table 5 New dwelling completions in Limerick, Type of Unit and Quarter (source: CSO)

2.4.17 Also with ongoing population growth trends evident from census figures this occupancy rate has increased in recent years.

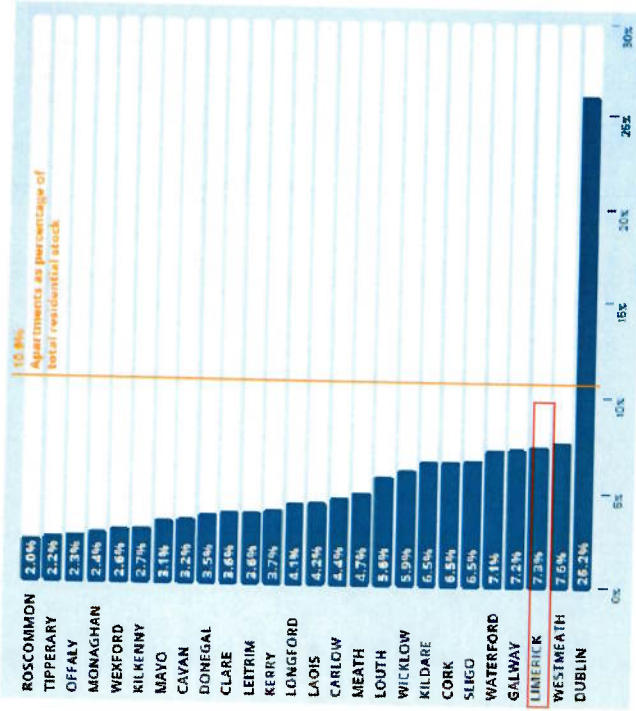
2.4.18 Further, at a county level it is noted from recent figures that the vacancy rate in Limerick is now recorded at an extremely low rate of 3.7% as per the latest Geodirectory Residential Issue report.

2.4.19 Further our analysis has found that In terms of existing apartment numbers it is noted that apartments form a low overall percentage of the housing mix within the county at only 7.3% of the total residential stock.

2.4.20 On the basis of the above it is clear there is a need for more residential units to be provided to accommodate the growing population within the Limerick Environs and in particular for apartment units.



Vacancy rates by County (Source Geodirectory Q4, 2025)

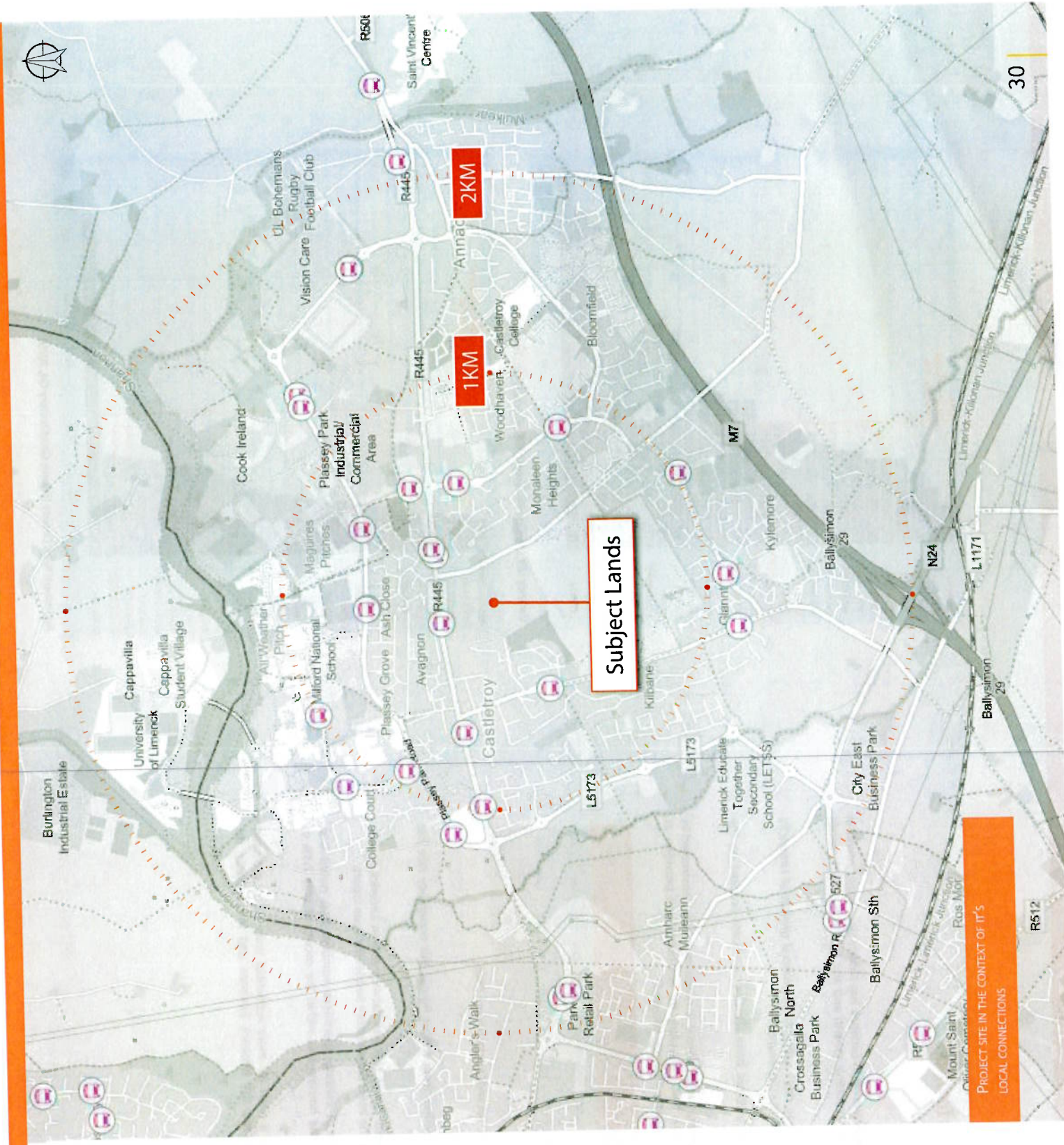


Apartment % by County (Source Geodirectory Q4, 2025)

02 Local Context

2.5 Rationale for the proposal: Connections

- 2.5.1 The site is served by Monaleen Road, which connects to the R445 (Dublin Road) and provides direct access to the wider Limerick Environs.
- 2.5.2 The location benefits from strong road connectivity, facilitating efficient access to and from the City centre.
- 2.5.3 Existing footpaths and cycle infrastructure in the area offer good access to local services and amenities. The site is also well served by public transport, with regular 308 bus services operating along Dublin Road to Limerick City Centre.
- 2.5.4 Overall the lands are strategically positioned within an established and accessible area, making them well suited to residential development in terms of local connectivity.



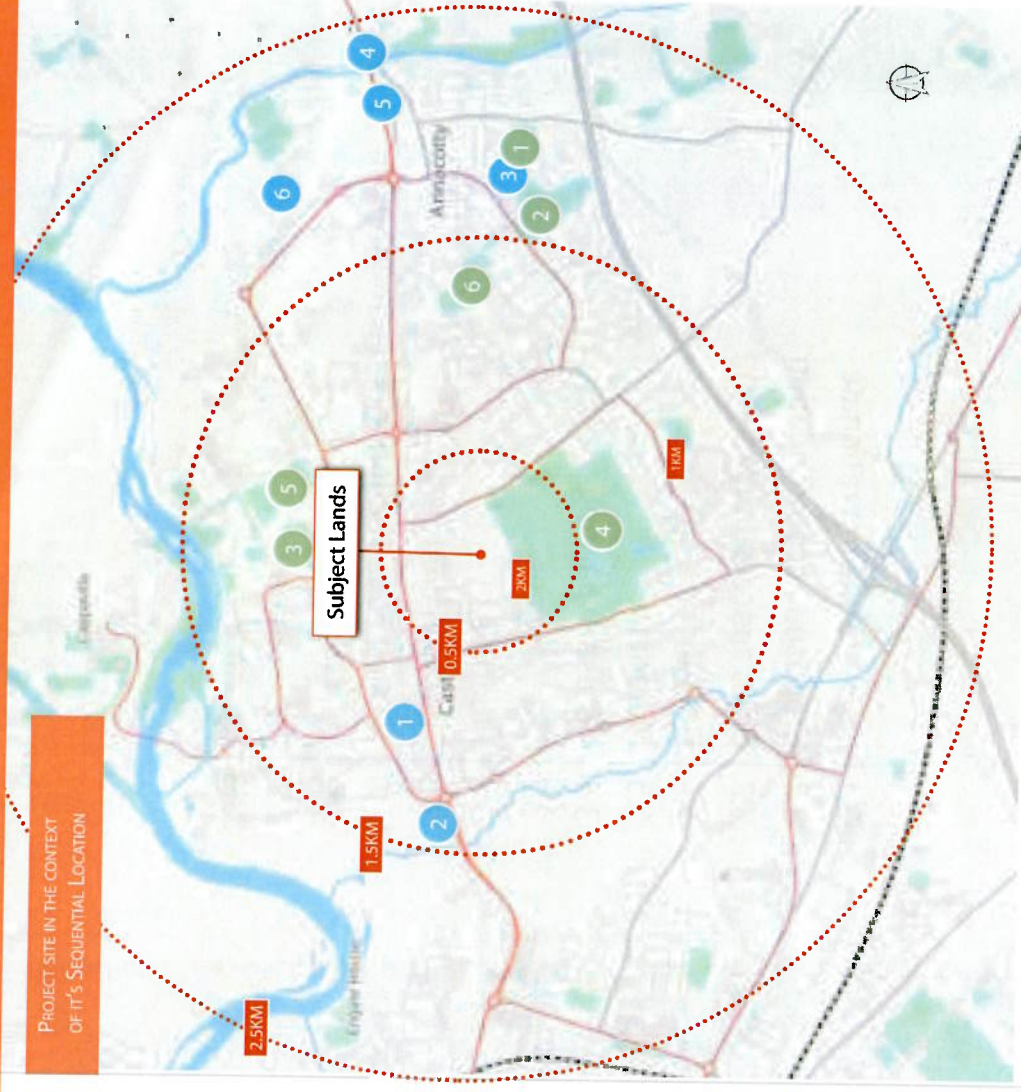
02 Local Context

2.6 Social & community infrastructure

- 2.6.1 Policy SC8 of the CDP sets out a requirement for proposals to demonstrate how residential developments are catered for in terms of social and community infrastructure.
- 2.6.2 Set out opposite is a map detailing how the site is well provided for in terms of social and community infrastructure within a 3km radius.
- 2.6.3 As can be noted the proposed development will be located in a well-provided for neighbourhood and within a short distance of a wide range of services for future residents.
- 2.6.4 In this context the development will provide a range of residential types which create a sustainable community and support the existing services in the area. Further analysis is set out in the accompanying Social Infrastructure Assessment.

2.7 Schools and childcare

- 2.7.1 In accordance with policy SCS014 of the CDP an audit of existing childcare and schools has also been undertaken by this practice, under separate cover, with a total of 18no. childcare facilities within a 3km radius and 28no. primary and post primary schools identified within a 5km radius of the site.
- 2.7.2 The assessment demonstrates in summary:
 - Childcare/crèche provision: The proposed childcare facility does not need to cater for any existing surplus demand outside of the site area itself at Monaleen Road and the crèche as proposed will be adequately sized to accommodate up to 60 children.
 - Primary and post primary school provision: There is adequate capacity in the Castletroy area going forward to cater for the proposed development in terms of both primary and post primary school provision.
- 2.7.3 As per accompanying plans the Crèche is designed to cater for 109 children, which is well above what the likely childcare demand our analysis finds is likely to be in the order of 60 childcare places from the proposed development.



Shopping & Community		Sports & Recreation Facilities	
1	Castletroy Park Hotel	1	Aisling Castletroy FC
2	Supermacs	2	Castletroy Park
3	Halleys Pharmacy	3	UL Sport
4	St Vincents Centre	4	Castletroy Golf Club
5	Copper and Spice Castletroy	5	Maguires Pitches UL
6	Johnson & Johnson	6	Gaelscoil Castletroy Pitches



03 The proposed development

3.1	Layout & design rationale
3.2	Proposed accommodation
3.3	Open space & landscaping
3.4	Height
3.5	Materials
3.6	Access & parking
3.7	Site services
3.8	Flood risk
3.9	Taking in charge
3.10	Project construction management plan
3.11	Part V
3.12	Archaeology
3.13	Phasing

03 The Proposed Development

3.1 Layout & design rationale

3.1.1 The layout has been primarily informed by context, policies and objectives as defined in the Limerick City & County Development Plan 2022-2028 and relevant section 28 guidelines. The design rationale includes:

- Net residential density of 53.9 units/ha.
- 15.9% high-quality, usable public open spaces including pocket parks, and a linear green route with active frontages.
- Crèche located at site entrance, acting as a community hub and placemaking anchor.
- Mix of houses, duplexes, and apartments with varied heights (2-5 storeys) to create a strong identity and visual interest.
- Focal buildings positioned along key frontages to enhance legibility and streetscape character.
- Clear, DMURS-compliant road hierarchy promoting walkability, permeability, and safe navigation.
- Active frontages and well-overlooked spaces ensure safety and vibrant street life.
- Setbacks and layout revisions address acoustic impacts from R445.
- Internal roads incorporate RSA feedback, with traffic calming and enhanced pedestrian visibility.
- Safe, sociable street design includes upgraded EV and cycle infrastructure, supporting sustainable mobility.
- A design that responds to site constraints, including drainage, ecological sensitivity, and local context.

3.1.2 The orientation and layout of buildings within the proposed development is also designed to create a balance between scale, active streetscapes and also providing a sense of place.

3.2 Proposed accommodation

3.2.1 We refer to the attached statement of housing mix which demonstrates how the mix of units is appropriate to the area in terms of demographic profile.

Description	Number	Percentage %
1 Bed Units	159	30.4
2 Bed Unit	151	28.9
3 Bed Unit	213	40.7
Total	523	100%

Table 6 Unit mix summary

3.2.2 Building typologies are broken down into blocks ranging from 2-3 storey dwellings to 5 storey apartment units. All units have been designed to fully accord with the guidelines 'Sustainable Urban Housing: Design Standards for New Apartments' and also the Guidelines 'Quality Housing for Sustainable Communities' as appropriate.

3.2.3 Also the majority of apartment units have been designed to incorporate a minimum 10% uplift in minimum floor areas as specified under the Guidelines. We refer to the accompanying Housing Quality Assessment for reference.



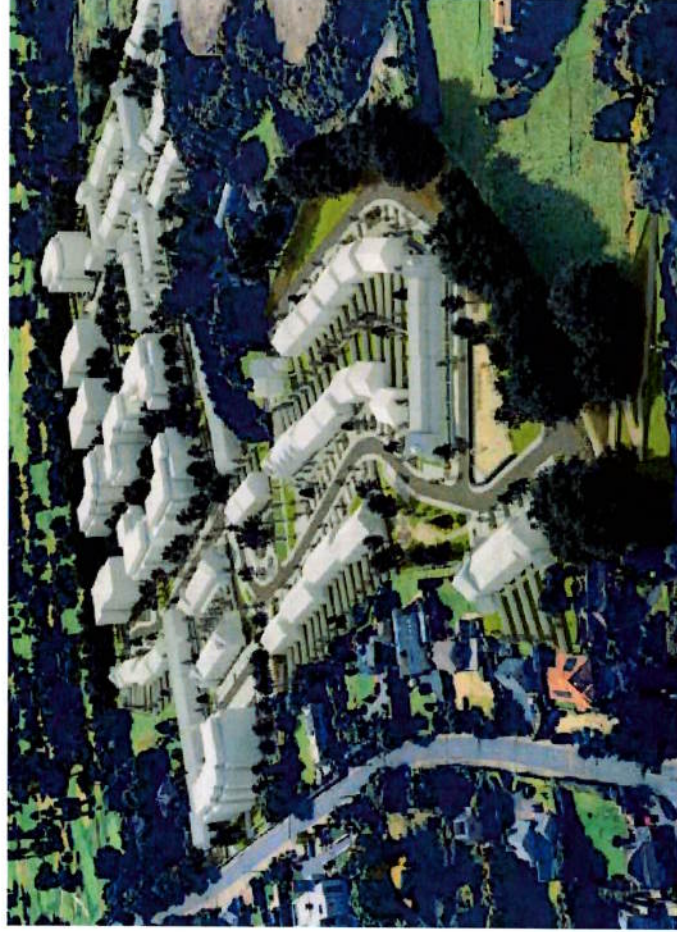
03 The Proposed Development

3.3 Open space & landscaping

3.3.1 Detailed consideration has been given to the provision of public open spaces and landscaping treatments within the development. The landscaping master plan for the site has incorporated a number of different landscaped areas, such as courtyards, play areas and walkways.

3.3.2 In terms of particulars we highlight:

- In excess of 15% high-quality public open space provided, including play areas, a central park, linear greenway and multiple pocket parks.
- A clear hierarchy of pedestrian and cycle links ensures strong site-wide connectivity and permeability.
- Dedicated communal open spaces provided for apartment and duplex residents.
- Landscaped buffers, planting belts, and privacy zones soften the built environment and reduce hard surfacing.
- A detailed landscape strategy, including planting plans and street furniture, enhances visual amenity and usability.
- All open spaces are overlooked by active frontages, promoting safe, sociable and well-surveilled environments.
- Open space provision meets density and play accessibility requirements, with pocket parks within 100m of all homes.
- Landscape design supports walkability, cycle access, and integration with future active travel infrastructure.



3.4 Height

3.4.1 The surrounding area is predominantly suburban in character, with typical building heights of up to five storeys. This context has informed a balanced height strategy across the development and the proposal is also appropriate in the context of the Limerick Height Strategy; discussed further in Section five of this statement.

3.4.2 Proposed building heights range from two to five storeys, with taller elements carefully located to respond to site topography, internal street hierarchy, and proximity to key frontages. Transitions in scale have been incorporated to ensure a respectful interface with adjacent residential areas and site boundaries.

3.4.3 The design approach minimises excessive regrading by responding to existing ground levels, reducing visual impact and allowing for seamless integration of green infrastructure.

3.5 Materials

3.5.1 A variety of materials are proposed within the development to provide visual interest and to create a distinct sense of place. The overall aesthetic concept is one of coherence and quality, balancing integration with the surrounding context and also providing for a unique and modern identity.

3.5.2 We refer to accompanying drawings prepared by Arnold Leahy Architects which detail proposed elevations and finishes.

3.6 Access & parking

3.6.1 The layout has been designed to connect to proposed pedestrian and cycle links to the R445 and the Monaleen Road which links to the wider Castletroy area and Limerick City Centre.

3.6.2 As with any intermediate location that is served by a bus route adjacent it is proposed to provide parking for residents and visitors in a manner that will encourage mobility shift.

3.6.3 Section five sets out the proposed parking and cycle storage proposals. In summary a total of 648no. car parking spaces are proposed, which is a reduction from the maximum standards of 732 spaces permitted under the CDP. It is submitted that due to the intermediate location and the nature of the development as a residential scheme then the proposed car parking provision is appropriate in this instance.

3.6.4 The proposed development will also provide for bicycle storage spaces in curtilage along with designated storage bays if required. It is submitted that the level of bicycle storage provided is sufficient to serve the proposed development. Local journeys will be encouraged to be undertaken via walking or cycling where practical with all units incorporating or having immediate access to storage space for bicycles.

3.6.5 There is a Bus Eireann bus stop located along the R445 which is to be upgraded to a quality bus corridor route. Appropriate pedestrian connections within the site and also to/from the bus stop via existing footpaths will ensure use is made of the public transport as available

03 The Proposed Development

3.7 Site services

3.7.1 The site is to be serviced via the existing Irish Water foul and water networks which pass along the site frontage. Further details regarding site services are provided in a separate report by Garland Consulting Engineers. Irish Water have also confirmed via a pre-connection inquiry that they have no objections to connections being made to serve the proposed development.

3.8 Flood risk

- 3.8.1 The site is located entirely within Flood Zone C as identified in the CFRAM study.
- 3.8.2 Accordingly with the site being outside an area identified at flood risk under the CFRAM study no further elaboration on flood risk is required and matters are settled in this regard.

3.9 Taking in charge

3.9.1 In accordance with taking in charge procedures in Limerick the development has been designed in such a manner as to allow for same. A condition pertaining to same is considered acceptable, providing for specific agreements with the Planning Authority prior to occupation of any units within the site.

3.10 Project construction management plan

3.10.1 Given the proximity of the site to the existing residential areas a project construction management plan accompanies the proposal. Matters to be addressed include management practices for works on-site in order to minimise the potential for any adverse effects on the recipient environment.

3.11 Part V

- 3.11.1 Section 96(3) of the Act sets out the 5 types of part V agreements that may be made.
- Transfer to the ownership of the local authority of a part or parts of the lands.
 - Build and transfer to the ownership of the local authority, or persons nominated by the authority, of a number of housing units on the site.
 - Transfer to the ownership of the local authority, or persons nominated by the authority, of housing units on any other land in the functional area of the local authority.
 - Grant a lease of housing units to the local authority, either on the site subject to the planning application or on any other land within the functional area of the local authority.
 - A combination of the transfer of the ownership of land under paragraph (a) of section 96(3) and one or more of the options of section 96(3).

3.11.2 In response the proposed development will provide for 20% of units (104 units under part V). It is proposed the 104 no. units will be provided as 'build and transfer' as shown on the Part V proposals under separate cover. A letter for preliminary Part V agreement is enclosed and this can be addressed by planning condition going forward.

3.12 Archaeology

3.12.1 This is addressed in the accompanying Archaeological Assessment incorporated into the EIAR.

3.13 Phasing

3.13.1 The proposed development will be carried out in five phases. The phasing approach will ensure completion of car parking and open space/site works in totality prior to the occupancy of each phase of the development. Also with unit numbers in phase one being only 59 units there is no requirement to deliver the Crèche in phase one.

3.13.2 We refer to the accompanying phasing drawing by AL Architects which details the phasing schedule.





04 Policy Context

4.1	Overview
4.2	National Planning Framework 2040
4.3	Housing For All
4.4	Urban Design Manual
4.5	Urban Development & Building Heights
4.6	Sustainable Residential Development & Compact Settlement Guidelines
4.7	Design Standards for New Apartments
4.8	National Sustainable Mobility Policy (2022)
4.9	DMURS
4.10	Appropriate Assessment
4.11	Climate Action Plan
4.12	Flood Risk Management Guidelines
4.13	Childcare Guidelines
4.14	RSES
4.15	EPA: EIA Guidelines
4.16	Water framework Directive
4.17	Local Policy
4.18	Core Strategy
4.17	Residential Development Management

04 National & Regional Policy

4.1 Overview

4.1.1 The key planning policy, section 28 guidelines and regional planning policy relative to the proposal are as follows:

- National Planning Framework 2040
- Housing for All
- Urban Development and Building Heights
- Compact Settlement Guidelines
- National Sustainable Mobility Management Plan
- Sustainable Urban Housing: Design Standards for New Apartments: Guidelines for Planning Authorities 2025
- Guidelines for Planning Authorities on Childcare Facilities (2001)
- Design Manual for Urban Roads and Streets
- Habitats Directive - Appropriate Assessment
- Regional and Spatial Strategy for the Southern Region
- Flood Risk Management Guidelines
- EPA: EIA Guidelines
- Water Framework Directive
- Limerick City and County Development Plan 2022-2028

4.2 National Planning Framework 2040 (Revised)

4.2.1 The National Planning Framework 2040 sets out the importance of development within existing urban areas and sets out strategic objectives which Planning Authorities are to have regard to.

4.2.2 In response we submit that the proposal in a growth town is wholly consistent with the strategy and objectives as set out in the NPF to increase residential development at appropriate locations, within the settlement boundary of Limerick City.

4.3 Housing For All

4.3.1 Housing For All was launched in 2021 with the objective that everybody should have access to sustainable, good quality housing to purchase or rent at an affordable price, built to a high standard and located close to essential services, offering a high quality of life.

4.3.2 Housing for All is set around 4 no. pillars of proposed actions summarised as follows:

- Increasing New Housing Supply.
- Addressing vacancy and efficient use of existing stock.
- Supporting home ownership and increasing affordability.
- Eradicating Homelessness, Increasing Social Housing Delivery and Supporting Social Inclusion

4.3.3 In response we submit the proposed development is consistent with pillars 1-4 above in that it will improve the supply of residential units for Limerick in a sustainable manner.

4.4 Urban Design Manual

4.4.1 In response the proposal is consistent with the 12 criteria set out the Urban Design Manual. We refer to the accompanying Planning Statement and also the Design Statement.

4.5 Urban Development and Building Heights (2018)

4.5.1 The guidelines put in place a presumption in favour of high buildings at locations with good public transport services, subject to design specifics.

4.5.2 In relation to redevelopment and enhancement of urban areas the guidelines state that:

'to meet the needs of a growing population without growing out urban areas outwards requires more focus in planning policy and implementation terms of reusing previously developed 'brownfield land', building up urban infill sites (which may not have been built on before) and either reusing or redeveloping existing sites and buildings that may not be in the optimal usage or format taking into account contemporary and future requirements'.

4.5.3 The guidelines also place significant emphasis on promoting development within the existing urban footprint utilising the existing sustainable mobility corridors and networks. They state:

'On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape'.

4.5.4 Of relevance is SPPR 4 which states:

'SPPR 4: It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:

1. The minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled "Residential Development in Urban Areas (2007)" or any amending or replacement Guidelines;
2. A greater mix of building heights and typologies in planning for the future development of suburban locations; and
3. Avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more.'

4.5.5 In response we submit the proposed building heights are an appropriate design response as envisaged under the guidelines for this suburban location.

4.5.6 In this policy context the design rationale incorporated into the design is for the development incorporating building heights up to 5no. storeys. On this basis we submit the design will be fully consistent with the approach envisaged under the guidelines for a suburban location.

4.5.7 For conciseness the accompanying Planning Statement sets out how consideration of Criteria under section 3.2 of the Building Height Guidelines are addressed.

04 National & Regional Policy

4.6 Sustainable Residential Development & Compact Settlement Guidelines

Overview

4.6.1 The Compact Settlement Guidelines have been recently adopted (January 2024) and set out policy and guidance in relation to the planning and development of urban and rural settlements, with a focus on residential development and the creation of sustainable and compact settlements.

4.6.2 We address the relevant matters and SPPRs from the Guidelines below.

Density

Under the Limerick Development Plan Castletroy falls within the Limerick City and Suburbs. In relation to density as per table 3.6 of the Guidelines it states that a density in the range of 35-50 dwellings per hectare (and up to 100dph) is acceptable.

	Centre		Urban	Suburban / Edge
Dublin / Cork	100-300 dph	50-250 dph	40-80 dph (+ 150 dph)	
Limerick / Galway / Waterford	100-200 dph	50-150 dph	35-50 (+ up to 100 dph)	
MASP Town	40-100 dph	40-100 dph	35-50	
Regional Growth Centres / Key Towns / Large Towns	40-150 dph	n/a	30 - 50 dph (+ up to 80 dph).	
Small to Medium Sized Town (>1500 - 10,000)	Respond to existing context.	n/a	25 - 40 dph	
Rural Towns and Villages	Respond to existing context.	n/a	Respond to existing context	

Extract from Table 3.6 of the Guidelines

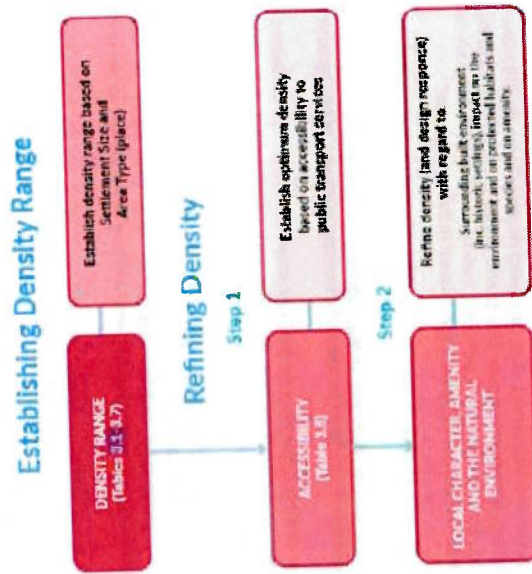
4.6.3 Regarding density policy and objective 3.1 states:

'It is the policy and objective of these Guidelines that the recommended residential density ranges set out in Section 3.2 are applied within statutory development plans and in the consideration of individual planning applications, and that these density ranges are refined further at a local level using the criteria set out in Section 3.3 where appropriate.'

4.6.4 In this context the net density proposed is 53.9 units per hectare and consistent with the Guidelines given it's accessible location and also the provisions of the Building Height Guidelines. Also relevant we highlight it is important to design the scheme so it does not appear out-of-context with a density that is excessive for this location.

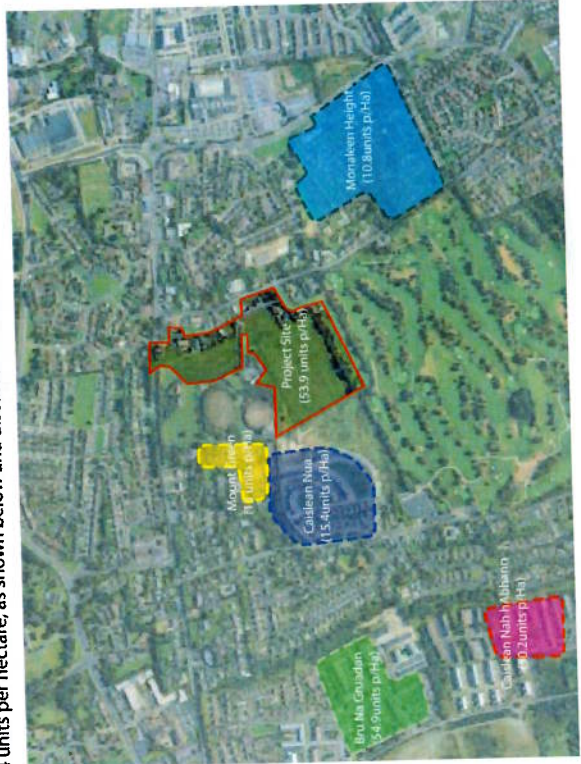
4.6.5 Furthermore regarding density Figure 3.3 of the Guidelines is highlighted.

Figure 3.3
Illustration of the process for establishing, optimising and refining appropriate density for a plan or development.



4.6.6

In response to Figure 3.3 of the Guidelines we have reviewed local character and density, with particular regard given the surrounding built environment which comprises density in the range of 10-54 units per hectare, as shown below and discussed further in the Design Statement enclosed.



4.7 Sustainable Urban Housing: Design Standards for New Apartments; Guidelines for Planning Authorities (2025)

- 4.7.1 The Design Standards for New Apartments provide for updated guidance on apartment developments in response to the National Planning Framework and Rebuilding Ireland.
- 4.7.2 In response the proposal is fully compliant with the Apartment Guidelines in terms of unit mix, design particulars, communal space provision, bicycle storage and waste storage.
- 4.7.3 Also in terms of daylight requirements all apartments have been designed to meet relevant BRE Guideline Standards. We refer to the accompanying Daylight assessment by for more discussion and which also assesses the proposal in the context of communal, private and public open spaces.
- 4.7.4 Given the daylight analysis demonstrates apartment units and open spaces (public and private) will perform satisfactorily on daylight then compensatory measures as per Section 6.7 of the Apartment Guidelines are not required.

4.8 National Sustainable Mobility Policy (2022)

- 4.8.1 In response being a suburban site within walking distance of all local amenities the proposal is consistent with this policy framework by encouraging Mobility shift. Further discussion is set out in the accompanying Mobility Management Plan by Road Plan.

4.9 Design Manual for Urban Roads and Streets (DMURS)

- 4.9.1 In response the principal design guidance of DMURS has been incorporated into the proposal. We refer to the accompanying DMURS Design Statement by Garlands which accompanies the application.

4.10 Appropriate Assessment of Plans and Projects; Guidelines for Planning Authorities

- 4.10.1 In summary we refer to the Natura Impact statement by JBA which concludes that the proposed development individually or in combination with other plans or projects will not impact adversely on the integrity or qualifying features of any Natura 2000 site.
- 4.10.2 As the competent authority to carry out appropriate assessment, we submit that the findings in the NIS enable An Coimisiún to reach its own independent conclusion on the basis of objective information that the proposed development, individually or in combination with other plans or projects, will not have an adverse effect on any Natura 2000 sites and this conclusion can be reached beyond a reasonable scientific doubt.

4.11 Climate Action Plan

- 4.11.1 The Climate Action Plan (2023) sets out an ambitious plan to put Ireland on a more sustainable path, cutting emissions, creating a cleaner, greener economy and society and protecting us from the consequences of climate change.
- 4.11.2 In response the proposed development is compliant with the objectives of the National policy context on Climate Action and Low Carbon Development as the development will incorporate A2 rated buildings and incorporate technologies to minimise impacts on climate change.
- 4.11.3 All measures when combined will ensure a sustainable inner urban development is delivered and we refer to the EIAR for further discussion.

4.12 The Planning System and Flood Risk Management Guidelines

- 4.12.1 In summary the site is not affected by Fluvial, Tidal or Pluvial Flood risk as per the CFRAM study.
- 4.12.2 In summary the proposal fully complies with the Section 28 Guidelines in terms of flood risk and we highlight the Planning Authority are satisfied this is the case also.
- 4.12.3 Also the design of surface water infrastructure ensures no increase in run-off rates from the site. Accordingly with the site being outside an area identified at flood risk under the CFRAM study no further elaboration on flood risk is required and matters are settled in this regard.

4.13 Guidelines for Planning Authorities on Childcare Facilities

- 4.13.1 The development has been designed in accordance with the Guidelines. We refer to the accompanying statement on the Childcare Needs Assessment prepared by this practice.
- 4.13.2 In summary:
 - Childcare/crèche provision: our analysis on existing crèche demand and spaces within the catchment area of 3km demonstrates that at present there are 761 max childcare spaces with 191 crèche spaces available for take up. On this basis the proposed childcare facility does not need to cater for any existing surplus demand outside of the site area itself.
 - Demand generated by the proposal for childcare: On analysis of the proposed scheme against the relevant childcare guidelines, the demographics of the area and the projected population have demonstrated that the proposal will be adequately sized by providing space to accommodate 109 children, against a demand for 60 children arising from the proposed development.
- 4.13.3 Furthermore being a full day care facility crèche provision is therefore consistent with both the 2001 Guidelines and Tusla standards set out in the 'Quality and Regulatory Framework' document for child care services.

4.14 Regional Spatial Economic Strategy for the Southern Region

4.14.1 The Regional Spatial and Economic Strategy 2020-2032 (RSES) provides the roadmap for effective regional development - it delivered a combination of response, design and innovation; in how we do business, deliver homes, build communities and value land-use - creating healthy places and promoting sustainable communities. The vision of the RSES is 'to play a leading role in the transformation of this region into a vibrant, connected, natural, inclusive and smart place to work and live.'

4.14.2 With regard to growth ambitions for the region the RSES notes the importance of compact growth in order to create more compact settlements:

'Compact Growth involves careful management of sustainable growth of compact cities, towns and villages to achieve better residential development across the Southern Region.'

4.14.3 At a strategic level the RSES aims to:

- Nurture all our places to realise their full potential;
- Protect and enhance our environment;
- Successfully combat climate change;
- Achieve economic prosperity and improved quality of life for all our citizens;
- Accommodate expanded growth and development in suitable locations; and
- Make the Southern Region one of Europe's most creative, innovative, greenest and liveable regions.

4.14.4 In response we submit the proposal is consistent with the RSES in that it will improve the supply of residential units for Castletroy in a sustainable manner; and in particular it's emphasis on the consolidation of the urban area and the promotion of residential development close to existing services and employment centres.

4.15 Environmental Impact Assessment: EPA Guidelines

4.15.1 The proposed development includes proposals for 523no. residential units in total on the site. Therefore, on the basis that the threshold of 500no. dwelling units or more has been exceeded, the preparation of an EIAR is required on that basis.

4.15.2 In summary an EIAR is enclosed that fulfils the requirements set out by the EPA Guidelines on the information to be contained in Environmental Impact Assessment Reports (May 2022) and also legislative requirements under the Planning and Development Regulations.

4.15.3 The EIAR sets out in detail the current state of the environment in the vicinity of the proposed development site to quantify the possible effects of the proposed development on the environment.

4.16 Water Framework Directive

4.16.1 For conciseness we refer to chapter 10 in the EIAR which assesses Hydrology. The EIAR chapter sets out how the proposal is fully compliant with the Water Framework Directive.

4.17 Local Policy Context & Zoning

4.17.1 The Limerick CDP sets out the strategic land use objectives and policies for the overall development of the City and its Environs.

4.17.2 We note the subject lands are zoned 'New Residential'.

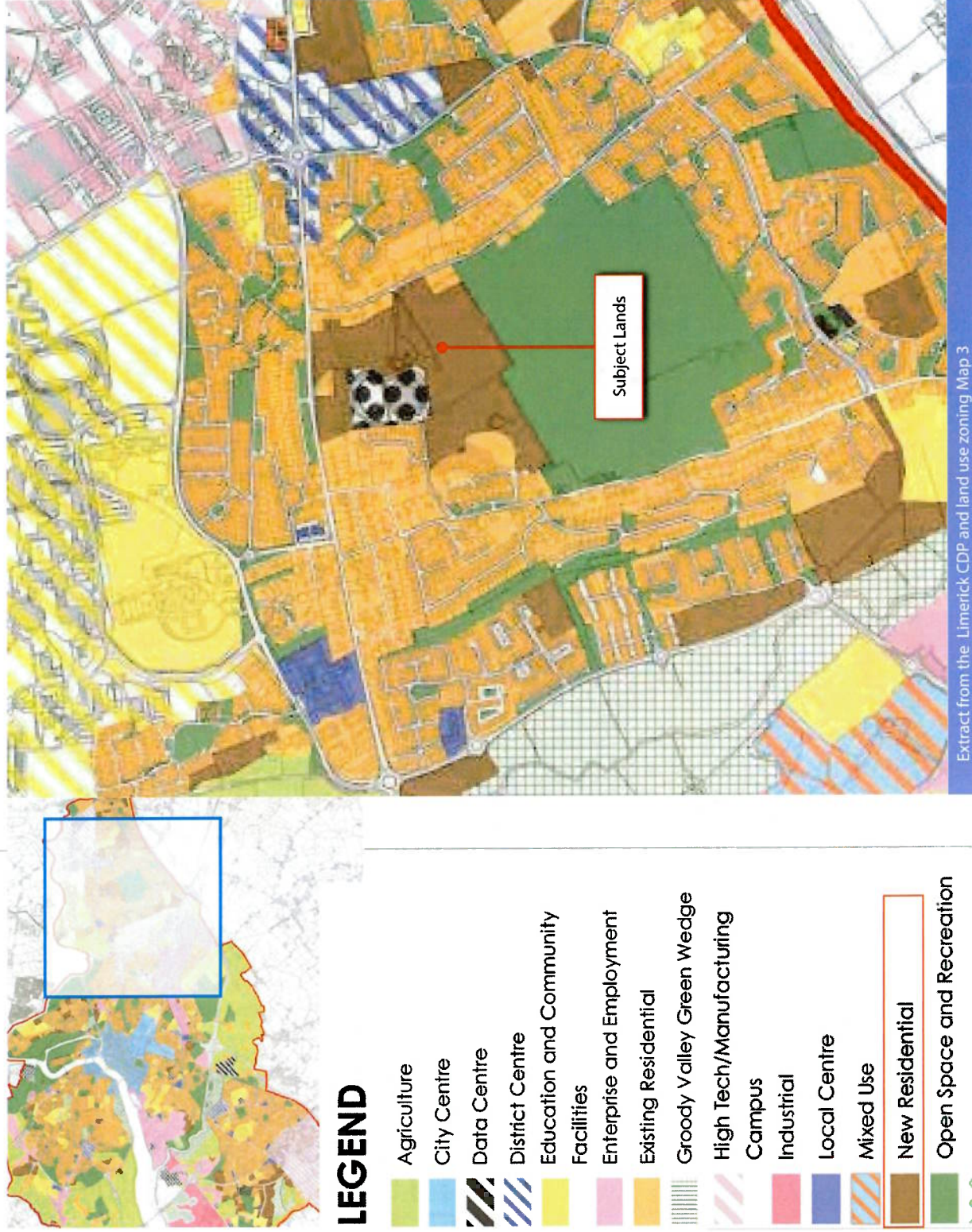
4.17.3 We highlight under 'New Residential' the objective states:

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

4.17.4 Furthermore the provision of a crèche on site is supported by the aim:

'This zone may include a range of other uses particularly those that have the potential to facilitate the development of new residential communities such as open space, schools, childcare facilities, doctor's surgeries and playing fields etc.'

4.17.5 In this context the development is plan-led as the zoning and land use objectives are being complied with.



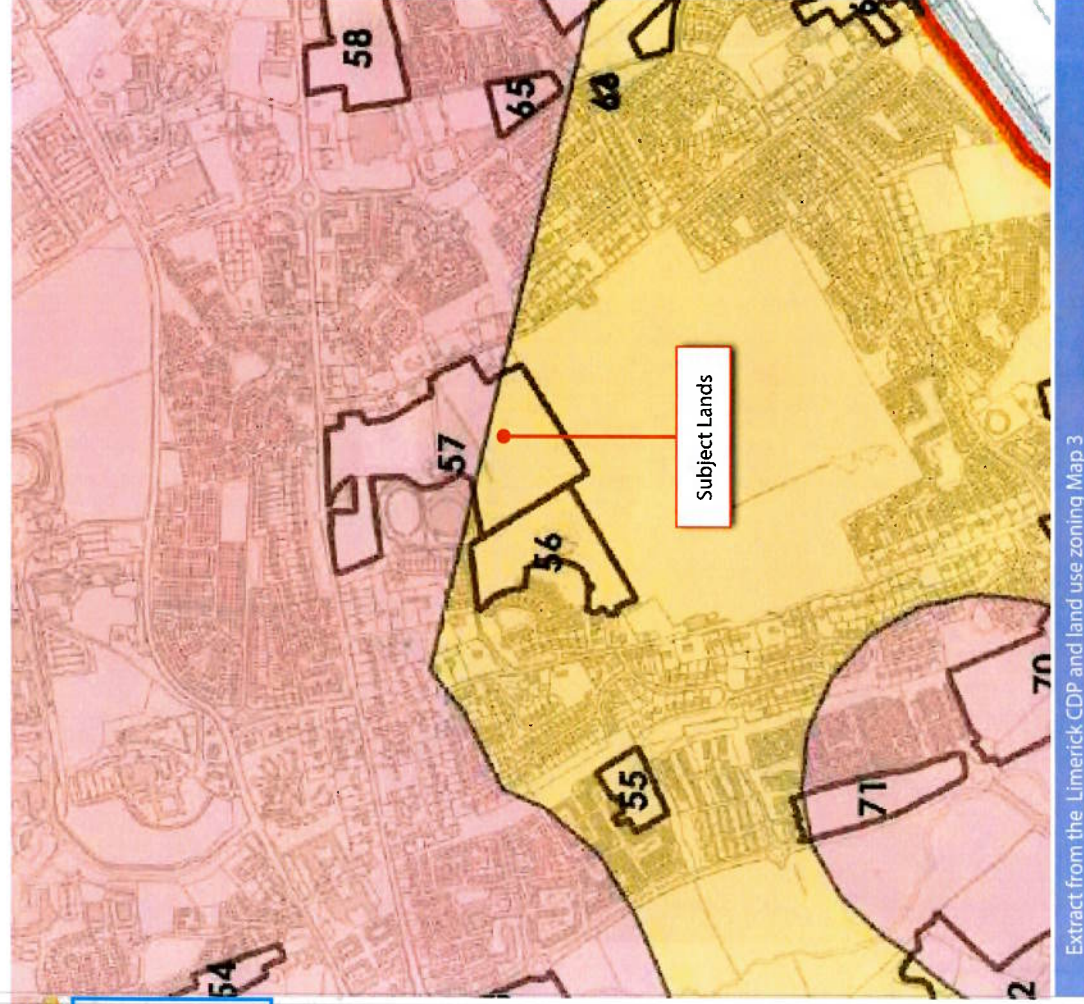
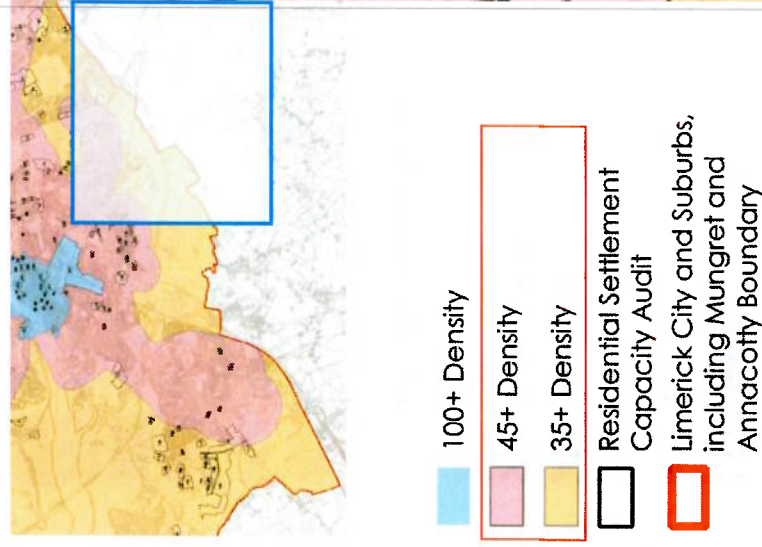
4.17 Local Policy Context & Zoning

4.17.6 The proposed site layout has been carefully designed to respond to its zoning context in the Limerick City and Suburbs Density Map, which straddles two designated density zones:

- 35+ units per hectare ;
- 45+ units per hectare.

4.17.7 By balancing unit distribution and building typologies across the site, the design achieves a net residential density of 53.9 units per hectare.

4.17.8 This density aligns with national and local planning policy objectives for compact growth, while making efficient use of serviced land and supporting the delivery of a sustainable, walkable neighbourhood.



Extract from the Limerick CDP and land use zoning Map 3

05 Local Policy

4.18 Core Strategy

4.18.1 The LCCDP provides a settlement hierarchy which provides the direction for new development within the County for the period 2022-2028. Under the core strategy Castletroy located in Limerick City and Suburbs is identified within the Limerick Shannon Metropolitan Area.

4.18.2 We note under the consolidated variation of the core strategy at county level it sets out a housing allocation for Limerick City and Suburbs up to the period 2028 with a housing allocation of 11,054 over the plan period. For reference we include an extract from table 2.7 of the CDP:

Level	Settlements	Census 2016 population	Population growth as % of 2016 base	Additional house-holds forecasted 2022-28	Target residential density ranges (UPHP)	Zoned land Required (hectares)	Existing brownfield zoned land available (hectares)	Infill or brownfield as % of total zoned lands	Shortfall (+) or excess (-) of zoned land (hectares)
Limerick City and Suburbs (in Limerick)		89,671	123,242	11,054	35 to 100+	259.25	353.06	84%	938
Shannon Metropolitan Area (in Limerick)		2930	3641	235	45+	5.22	838	80%	316
		277	687	153	35+	4.37	438	100%	901
	City and Suburbs (in Limerick), Mungret and Annacotty	92,878	127,570	11,442	37%	268.84	365.82	84%	96,98ha. (Capacity for 12,750 units on zoned lands)

4.18.3 As set out in the accompanying Statement of Housing Mix the total quantum of housing and apartments since adoption of the CDP in July 2022 (3 years) is averaging 606 units per annum across the County against what the Core Strategy seeks to deliver being 1907 per annum. This is significantly below the Core Strategy Target for the County and is circa 31% of the Core Strategy Target per annum.

4.18.4 In relation to Limerick City and suburbs our analysis also finds that 1292 units have been delivered since 2022 (431 per annum), against the Target being 1842 units per annum (11,054 between the period 2022-2028); 23% of Targets being met. We also highlight this Core Strategy has since been updated in 2026 with an uplift in Housing Targets to 2740 units per annum pursuant to the Section 28 Guidelines NPF Implementation Guidelines for Planning Authorities. (this was previously a target of 2599 units per annum under the 2022 CDP).

4.18.5 In response we submit the proposal is therefore consistent with the core strategy and housing allocation as set out in the Limerick City & County Development Plan 2022-2028, as varied. With regards to overall policy objectives of the CDP we refer to key policy objectives:

- Aligning with NPO4 of the NPF which targets 50% of future population and employment growth to be provided in the five cities and their suburbs;
- Policy CS P1 Core Strategy Implementation It is a policy of the Council to implement the Core Strategy for Limerick to ensure consistency with policies at a national and regional level, in particular population targets and distribution.
- Policy CS P2 Compact Growth It is a policy of the Council to support the compact growth of Limerick City Metropolitan Area, towns and villages by prioritising housing and employment development in locations within and contiguous to existing City and town footprints where it can be served by public transport and walking and cycling networks, to ensure that development proceeds sustainably and at an appropriate scale, density and sequence, in line with the Core Strategy

4.18.6 In this context the proposed development is consistent with these overarching policy objectives of the core strategy and development plan.

4.19 Residential development management standards

4.19.1 For conciseness we refer An Coimisiún to section 5.3 of the Planning Statement which accompanied the application.

4.19.2 In summary the proposal is wholly consistent with the relevant policy tests and we also highlighted the Planning Authority are satisfied in this regard with no design amendments.

05 | Response to Grounds of Appeal

5.1 Overview

5.2 Responds to Grounds of Appeal

05 Response to Grounds of appeal

5.1 Overview

5.1.1 The applicant has gone to great length to ensure that a comprehensive planning and environmental assessment of the proposal was provided to the Planning Authority, demonstrating how the proposed development is compliant with the relevant statutory planning policy and the proper planning and development of the area.

5.1.2 We also highlight from the planner's report they are satisfied that this is the case.

5.1.3 We would also highlight that the concerns raised in the appeal to An Coimisiún, have been either addressed in the planning application documents and/or the assessment of the Planning Authority.

5.1.4 Ultimately the Planning Authority was satisfied, when making its assessment and determination, that the planning application was consistent with National, Regional and Local planning policy have been satisfied.

5.1.5 Also we refer An Coimisiún to the respective submission made by the appellant to the Planning Authority during the course of the application which set out stated concerns to include apartment heights, privacy and red line boundary questions.

5.1.6 As per the planner's report of the above matters are to the satisfaction of the Planning Authority, with no amendments or mitigation measures incorporated into the decision.

5.1.7 Notwithstanding the above, in preparing this response we have sought to identify all of the grounds contained in the third party appeal and to elicit the key issue we provide our response to each matter below.

Zoning

5.1.8 In the first instance and of relevance to the planning context for this appeal we refer An Coimisiún to the Residential zoning which pertains to the lands. The proposal is plan-led and deemed appropriate for the residential development as proposed through the statutory development process.

5.1.9 Indeed by virtue of the RZLT now applicable there is now an obligation on the prospective applicant to develop the lands for residential use, as otherwise a RZLT penalty will arise.

5.1.10 In this context the proposal aligns with the proper planning of the area to deliver homes and a crèche on zoned lands as per the development plan objectives which deemed the lands appropriate for the proposal in the context of the wider environs and third party land uses.

Context

5.1.11 Having reviewed the planning register we highlight comparable grounds of appeal were recently considered by An Coimisiún under ACP decision reference 323968-25 on lands at Golf Links Road and Mount Green Road, Castletroy per map below.

5.1.12 This appeal is particularly relevant as it set out considered assessment on matters relating to proximity to the Golf Club, the same density concerns and the same infrastructure concerns which are now the subject of this appeal.

5.1.13 We submit that An Coimisiún's own reasoning and planning assessment are directly material to consideration of this appeal at Monaleen Road.



Site context and appeal site 323968-25

05 Response to Grounds of appeal

5.2 Response to Grounds of Appeal

5.2.1 We address each third party appeal separately below.

- Appeal 1: Pam Maloney

5.2.2 The appeal states:

'Our grounds of appeal as outlined in our submission to LCC are as follows:

- Inadequate daylight and sunlight assessment.
- Failure to assess Annual Probable Sunlight House (APSH) and impacts on rear rooflights.
- Inaccurate representation of site levels and boundary relationships.
- Inappropriate boundary treatment in the context of a retained embankment.
- Lack of structural and drainage safeguards.
- Unacceptable loss of residential amenity, including overlooking and overshadowing.
- Failure to assess cumulative and long-term overshadowing impacts.
- Overdevelopment, contrary to the established character of the area.

5.2.3 Response: For reference the appellant's property is noted as per the map below.



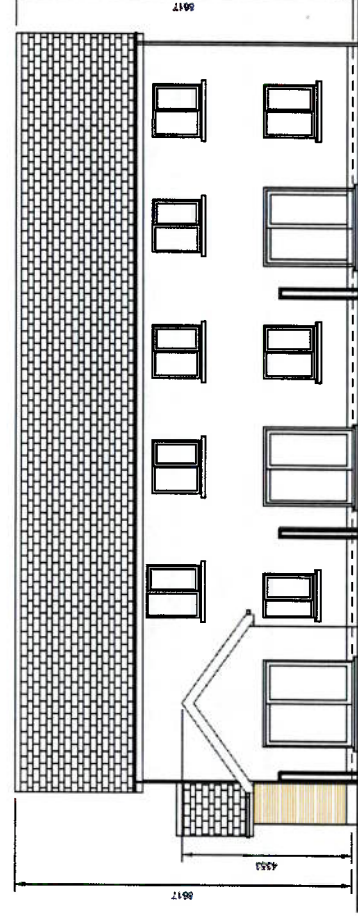
Site layout in the context of appellant's property & proposed unit for plot 158

5.2.4 As shown on the site layout plan the closest proposed dwelling is 16.1 metres from the rear boundary of the appellant's dwelling, and at this closest point only a single storey rear projection is proposed for unit 158 which is a 2 storey dwelling.

5.2.5 This separation distance adheres to the provisions of the Compact Settlement Guidelines.

5.2.6 To demonstrate how this layout is appropriate relative to the appellant's property the project team have prepared a scaled model render of the proposed layout; shown below.

5.2.7 As shown the existing dwellings along Monaleen Road are provided with a design and layout that is appropriate with only 2 storey units proposed and adequate separate distances proposed from the party boundaries.



REAR ELEVATION
Scale 1:100

Site model in the context of appellant's property & proposed unit for plot 158

5.2.8 Also the Daylight, Sunlight and Shadow Assessment by Digital Dimensions demonstrates no unacceptable impact on existing or proposed dwellings in terms of Daylight, Sunlight or Shadow. This is detailed in section 3.2 of the study and the appellant's dwelling/property was duly assessed and is referenced as property C in the report.

3.2 Preliminary Assessment of Adjoining Dwellings

The BRE guidelines BRE2018:2022 recommend that loss of light to existing windows need not be assessed if the distance of each part of the new development from the existing window is three or more times its height above the centre of the existing window. This area referred to as the zone of influence is plotted in yellow in Figure 2 below. Over most of the site, the zone of influence does not extend to any existing residential structure or to structures in the development to the south west, which is currently in the planning process.

The north and east boundaries, where the zone of influence is close to residential properties, the area is examined in detail, as shown in Figure 3 below. Here the dwellings are subject to sectional analysis. Section planes perpendicular to the windows of habitable rooms, which face the proposed development are indicated in blue. The planes at locations A - E extend and if they intersect the proposed development, they are plotted in Figure 4 below.



5.2.9

In summary the Daylight, Sunlight and Shadow Assessment by Digital Dimensions demonstrates no unacceptable impact on existing or proposed dwellings in terms of Daylight, Sunlight or Shadow. Indeed of relevance we refer to both sections 1.6 and section 3.3.17 of the BRE Guidelines which states in relation to impact on adjacent properties gardens and open spaces:

'1.6 The guide is intended for building designers and their clients, consultants, and planning officials. The advice given here is not mandatory and the guide should not be seen as an instrument of planning policy; its aim is to help rather than constrain the designer.'

'3.3.17 It is recommended that for it to appear adequately sunlit throughout the year, at least half of a garden or amenity area should receive at least two hours of sunlight on 21 March. If as a result of new development an existing garden or amenity area does not meet the above, and the area that can receive two hours of sun on 21 March is less than 0.80 times its former value, then the loss of sunlight is likely to be noticeable. If a detailed calculation cannot be carried out, it is recommended that the centre of the area should receive at least two hours of sunlight on 21 March.'

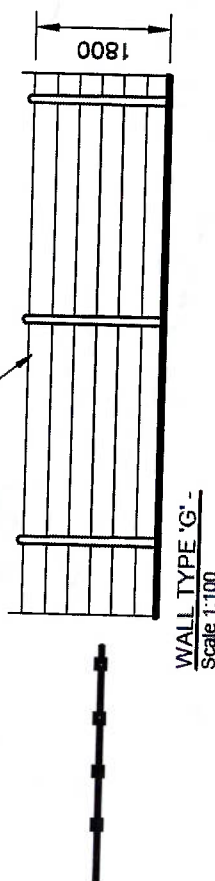
5.2.10

As shown in the accompanying assessment by Digital Dimensions the recommended standards for neighbouring lands and the appellant's property or dwelling are not impacted by the proposal, neither in terms of shadow, daylight or sunlight.

5.2.11

Also to address concerns raised by the appellant in terms of boundary treatments and general arrangement of the proposal relative to their property this is addressed in the the boundary proposals by Arnold Leahy Architects. As shown a new 1.8m height concrete post and plank fence is proposed along the boundary, with the existing hedge also retained. (refer to drawing sheet 107)

1.8m HIGH CONCRETE POST AND CONCRETE PLANK FENCE, TO ENGINEER'S DETAIL.



5.2.12

In this context we submit appeal grounds by Pam Maloney are fully addressed in application documents. Going forward should An Coimisiún deem a 2 metre high wall is more appropriate along this boundary this can be addressed by planning condition.

5.2.13

We would also highlight for An Coimisiún the above matters were duly considered by the Planning Authority.

5.2.14

On these basis we submit no matters have been raised that have not been addressed either in the assessment of the Planning Authority or our responses above.

05 Response to Grounds of Appeal

• Appeal 2: P Gerard Boland

5.2.15 The appeal sets out a number of grounds and we address each matter below.

• Ground 1: Contravention of the Limerick City and County Development Plan 2022-2028

5.2.16 **Response:** The proposal fully aligns with the zoning and policy objectives of the Limerick City and County Development Plan. For conciseness we refer to our Planning Statement which sets out same.

5.2.17 We also note this was considered by the Planning Authority and the proposal was deemed compliant with the policy and zoning context as applicable.

• Ground 2: Height, scale and density is a material contravention of the Limerick City and County Development Plan 2022-2028

5.2.18 **Response:** We refer to the Planning Statement which specifically addresses height (pages 81-84). It states:

'In accordance with the requirements of the Urban Development and Building Height Guidelines for Planning Authorities (2018), a Building Height Strategy for Limerick City has been incorporated into the Development Plan. The strategy acknowledges that the Castlebar / University Gateway Area is predominantly low rise, 1-3 storeys, and substantially residential in character. It further acknowledges that the higher end of the height range is generally located in the newer residential areas including inter alia Bloomfield as well as in purpose built student accommodation such as Brookfield Hall which is up to 4 storeys.

According to the Building Heights Strategy, 'tall building' is defined as one that is significantly taller than the established building heights in the surrounding area. The subject site is currently adjacent to a two/three-story buildings. Considering the site's intermediate urban location and the provisions of the Urban Development and Building Height Guidelines, 2018, it is our assessment that the proposed 2-5 storey urban blocks are appropriate for this context.

These heights facilitate a diverse mix of unit types and sizes within the broader area. The proposal as submitted has undergone a detailed assessment using the localised assessment tool. This assessment was conducted in accordance with the criteria outlined in Policy TB 7 of the Limerick Development Plan and it is our assessment that the development aligns with the specific context and planning objectives.

Relevant to the proposal the Building Height Strategy notes on page 98 'These tools together will guide building height by providing an indication of appropriate heights which will allow for a degree of flexibility to adapt to local circumstances through the application of performance based criteria, in line with NPO 13 of the NPP and the Building Heights Guidelines

Also we refer to pre-planning discussions wherein building heights were supported by the Planning Authority, having regard to the site, the local policy context and the Section 28 Building Height Guidelines. In this context we note there is no policy restriction that prohibits buildings up to 5 storeys on the site (or higher), but rather the approach to Building Heights is to ensure quality design and placemaking.'

5.2.19 Also in terms of density the proposal aligns with both the local policy context and the Section 28 Guidelines Sustainable Residential Development and Compact Settlement Guidelines:

5.2.20 A net residential density of 53.9p/ha is proposed, which aligns with the Limerick City & County Development Plan 2022-2028 and the Section 28 Guidelines for Sustainable Residential Development and Compact Growth. This density is considered appropriate for an Intermediate and accessible location and supports the efficient use of serviced, zoned lands.

5.2.21 The proposed density achieves a balanced response to national, regional and local policy objectives by delivering compact growth while respecting the site's suburban context and ensuring integration with surrounding residential areas.

5.2.22 In terms of height, the proposal includes a considered mix of 2 to 5-storey buildings, with increased heights concentrated in the core of the site within the apartment blocks. This approach reflects guidance in the CDP and also national policy, promoting higher density in appropriate locations while incorporating a lower height proximate to third party dwellings.

5.2.23 Focal buildings are strategically positioned along key routes and frontages to enhance legibility, contribute to placemaking, and support a coherent urban structure.

5.2.24 In response we say no Material Contravention of the CDP arises on these matters.

• Ground 3: Traffic Congestion and Road Safety

5.2.25 **Response:** We refer to the Traffic and Transport Assessment, DMURS Audit and Road Safety Audit which accompany the application now under consideration. As set out in the TTA:

The objective of this report is to examine the traffic implications of the proposed residential development in terms of how it can integrate with existing traffic in the area. The report will determine and quantify relevant elements of additional trips generated by the proposed development and the impact of such trips on the operational performance of the local road network and junctions, in particular the existing R445 / Monaleen Rd priority junction and the proposed Development Access / Monaleen Rd priority junction.

CONCLUSIONS

Junction analyses to assess the effects of traffic generated by the proposed development have been undertaken for the existing R445 / Monaleen Rd priority junction and the proposed Monaleen Rd / Development Access priority junction. The analysis shows that:

-The existing R445 / Monaleen Rd priority junction currently operates within capacity with minimal queues and delays during the AM and PM peak hours.

-The existing R445 / Monaleen Rd priority junction will continue to operate within capacity with small queues and delays when the proposed residential development is completed in 2035, year of opening, 2040, five years after opening and in 2050, fifteen years after opening.

-The proposed Monaleen Rd / Development Access priority junction will operate within capacity with minimal queues and delays when the proposed residential development is completed in 2035, year of opening, 2040, five years after opening and in 2050, fifteen years after opening.'

5.2.26 In response we highlight all design standards are incorporated into the layout to ensure no traffic, pedestrian or cyclist safety matters arise and the local road network has capacity to cater for the proposal.

05 Response to Grounds of Appeal

Ground 3: Childcare and Education

- 5.2.27 **Response:** This is addressed in the Schools, Childcare and Social Infrastructure Assessment which accompanied the application.
- 5.2.28 We also highlight the zoning which pertains to the lands and the Planning Authority are satisfied the re is adequate capacity in the area in terms of Social Infrastructure.
- 5.2.29 We also note these matters were raised under the adjacent appeal. Having reviewed the planning register we highlight comparable grounds of appeal were recently considered by An Coimisiún under ACP decision reference 323968-25 on lands at Golf Links Road and Mount Green Road, Castletroy. The Inspector's conclusion in terms of Social Infrastructure is highlighted:

'As the proposal forms part of the final phase of an existing residential estate and is at the edge of Limerick City and served by existing facilities, I am satisfied that the proposed development will not cause undue pressure on the capacity of the existing social and community infrastructure in the area.'

Ground 4: Previous Planning Permission

- 5.2.30 **Response:** The appeal references the previous 2004 and 2007 permissions and sets out the design rationale incorporated into same provided for a 30 metre buffer zone to protect the second Fairway of Castletroy Golf Club.
- 5.2.31 In response we highlight no such buffer was stipulated and this statement by the appellant is misleading. Also the zoning which pertains to the lands does not have a key site requirement to incorporate such as buffer and the proposal fully complies with the zoning objective to deliver residential on the lands.
- 5.2.32 Indeed the provisions of the RZLT are relevant wherein the land-owner (applicant) has an obligation to develop the lands as proposed. We highlight this for An Coimisiún which the appellant fails to recognise.
- 5.2.33 The provisions of a zoning objective are also to be noted and of relevance is the High Court Judicial review case 'Michael Redmond V An Bord Pleanála' wherein at paragraph 64 it states:
'The concept of a zoning objective is a term of art under the planning legislation. The concept is introduced under section 10(2)(a) of the PDA 2000 as follows:
'(2) Without prejudice to the generality of subsection (1), a development plan shall include objectives for-
(a) the zoning of land for the use solely or primarily of particular areas for particular purposes (whether residential, commercial, industrial, agricultural, recreational, as open space or otherwise, or a mixture of those uses), where and to such extent as the proper planning and sustainable development of the area, in the opinion of the planning authority, requires the uses to be indicated;'
A zoning objective enjoys an enhanced status over that of other policies and objectives under a development plan.'
- 5.2.34 Accordingly we say to not grant permission would be contrary to the zoning.
- 5.2.35 Also the provision of a 30 metre buffer from the Golf Course is not required; discussed further below in our response to the appeal by AK Planning.

Ground 5: Proposed Boundaries

5.2.36

Response: To address concerns raised by the appellant in terms of boundary treatments and general arrangement of the proposal relative to their property this is addressed in the the boundary proposals by Arnold Leahy Architects. We refer An Coimisiún to drawing sheet 107 and we say boundary proposals are wholly appropriate for the site and design rationale.

05 Response to Grounds of Appeal

• Appeal 3: AK Planning

5.2.37 The appeal sets out a number of grounds and we address each matter below.

5.2.38 In the first instance and to set the context we do however refer An Coimisiún to appeal decision e 323968-25 on lands at Golf Links Road and Mount Green Road, Castletroy per map below.

5.3.39 This appeal is particularly relevant as it set out considered assessment on matters relating to proximity to the Golf Club, the same density concerns, the same environmental concerns and the same infrastructure concerns which are now the subject of this appeal.

5.3.40 We have reviewed the planning register and note under appeal submission 323968-25 the response from the applicant's team (HRA Planning) noted on page 3:

'Having regard to the circumstance of events and the opportunity afforded to the Golf Club to mitigate impact on adjoining landuse, it is submitted to ACP that the onus in relation to public safety does not solely lie with the applicant.'

5.3.41 We highlight this background to set the context in terms of planning assessment and submit that An Coimisiún's own reasoning and planning assessment are directly material to consideration of this appeal at Monaleen Road.



Site context and appeal site 323968-25

• Ground 1: Failure to require an adequate ball-strike risk assessment

5.2.37 By way of background we have reviewed the planning register and note the previous permission granted in 2004 provided for the layout shown below; granted on appeal under ABP reference 13.214354

5.2.38 At that time Castletroy also objected to the proposal with an extract from the site layout below where the residential lands adjoin the Golf Course. In summary An Bord Pleanála granted permission without mitigation.



Site layout under appeal 13.214354 (LCC decision reference 042264)

5.2.39 Secondly our review of the planning register also finds that in relation to the lands to the west (appeal site 323968-25) permission has been granted without mitigation and the recent Inspector's report sets out:

Para 9.7.6 'Following my site inspection, I note that there are presently no measures in place to ensure that balls from the golf course do not enter the adjoining lands either on the appeal site or the adjoining golf club lands i.e. there is presently no screen or mesh in place. While the applicant states that the boundary planting and wall to the south of the site will be retained, I acknowledge that the existing hedgerow and wall along the southern boundary of the site is inconsistent with no boundary wall present at the location from my site inspection. The boundary presently consists of intermittent fencing and sporadic planting.

Para 9.7.7 'I do not consider it appropriate to refuse planning permission for this reason as suggested in the grounds of appeal. Furthermore, I do not consider the proposed mitigation measures as suggested by the appellant are warranted on this site. Whilst I acknowledge the presence of the golf course, the appeal site is zoned for residential development and forms part of an existing residential estate. Furthermore, the layout of the proposed development has regard to the adjoining land use with an area of open space directly adjoining the southern site boundary.

Para 9.7.9 'The appellant also references Objective SCS1 O20 Protection of Sports Grounds/Facilities of the Development Plan, where it is an objective of the Council to ensure that adequate playing fields for formal active recreation are provided for in new development areas and to protect, retain and enhance existing sports facilities and grounds and considers that the proposed development conflicts with this objective. The proposed residential development is located on lands zoned for residential development, and forms part of an existing residential development. Therefore, I do not consider that the proposed development conflicts with this objective, the golf club is on the adjoining lands and does not form part of this application.

05 Response to Grounds of Appeal

- Ground 1: Failure to require an adequate ball-strike risk assessment (Contd).

5.2.40 For reference the site layout granted under 323968-25 is shown below.



Site layout under appeal site 323968-25

5.2.41 In summary this is a wholly comparable and relevant precedent and the same planning assessment applies as the Inspector correctly notes under 323968-25:

Para 9.7.7

'I do not consider it appropriate to refuse planning permission for this reason as suggested in the grounds of appeal. Furthermore, I do not consider the proposed mitigation measures as suggested by the appellant are warranted on this site. Whilst I acknowledge the presence of the golf course, the appeal site is zoned for residential development and forms part of an existing residential estate. Furthermore, the layout of the proposed development has regard to the adjoining land use with an area of open space directly adjoining the southern site boundary.'

5.2.42 Furthermore we also highlight the provision of a ball-strike net is not practical as the party boundary between the appeal site and the Golf Course is aligned with mature trees and to install a ball-strike net would adversely affect ecology



Southern boundary of appeal site and golf course

5.2.43 Of relevance section 11.4.4.1 of the EIAR refers to Bat Surveys and states:

'Bats were recorded commuting and foraging mainly along the boundary features and around the edges of patches of tall scrub/ tree areas.'

5.2.44 In this context we say this ground of appeal seeking installation of a ball strike net would be unnecessary, unreasonable, not consistent with the decision by ACP under 323968-25 and also potentially impact ecology species in the area. Indeed the provision of a buffer strip alongside the southern site boundary is consistent in terms of separation distances from what was previously deemed acceptable under ABP reference 13.214354 and most recently under 323968-25.

5.2.45 We would also highlight for An Coimisiún the above matters were duly considered by the Planning Authority.

05 Response to Grounds of Appeal Context

- Ground 2: Trespass and Anti-Social Behaviour
- 5.2.46 Response: The site is zoned Residential and to not develop the lands for residential would be contrary to the proper planning and development of the area. Anticipated future scenarios which may result in trespass is not a planning consideration but rather a civil matter.
- 5.2.47 Indeed the provisions of the RZLT are relevant wherein the land-owner (applicant) has an obligation to develop the lands as proposed. We highlight this for An Coimisiún which the appellant fails to recognise.
- Ground 3: Operational Restriction & Insurance
- 5.2.48 Response: The development of the lands for Residential will not infringe on Golf Club operations. As the Coimisiún will note it is common-place for residential units to be positioned alongside Golf Clubs as they are compatible land uses with no unacceptable noise or operational emissions from either land use. Again we refer to the zoning which has deemed residential acceptable directly adjacent to the Golf Club and the directly comparable precedent under appeal 323968-25.
- Ground 4: Agent of Change Principle
- 5.2.49 Response: We have reviewed appeal particulars under 323968-25 and note the Golf Club raised this as a Ground of Appeal also. The Inspector's report considers same and states at paragraph 9.7.12:

'In this regard, I note that the development must comply with the land use zoning objective and the relevant policies and objectives of the relevant Development Plan and National and Regional guidance. There is no reference to the 'agent of change principle'. Notwithstanding, I consider that the onus is on both the developer and the adjoining landowner (i.e. the Golf Course in this instance), to have regard to the directly adjoining sites, the zoning objective pertaining to the lands, their existing use and any resultant impact on same. To this end, I note that the layout of the proposed development has been considered to minimise the impact on the directly adjoining sites to the north, east, west and south respectively given the proposed separation distances to the nearest adjoining residential dwelling and site boundary. I also note the existing residential development on site and that the development as proposed is an extension of this development, on lands zoned for residential development, which has been noted in the foregoing assessment. I consider that the retention and reinstatement of the boundary and additional planting as recommended will ensure that the proposed development will not negatively impact on the adjoining golf course lands and will protect the amenity of the appeal site.'
- 5.2.50 In summary the same principle applies to the appeal now under consideration and with retention of the southern site boundary and also the proposed site layout we say the proposal will not negatively impact the Golf Course lands.
- 5.2.51 We also note this was considered by the Planning Authority and condition 10 seeks installation of a 2.5m boundary wall along the southern site boundary. Going forward should the Coimisiún deem additional mitigation is appropriate we would suggest additional tree and planting is more appropriate to augment with existing trees and not impact on root zones sub-surface along the southern boundary.

- Ground 4: Objective SCS1 020 Protection of Sports Grounds
- 5.2.52 Response: The objective in the Development Plan states:

'Objective SCS1 020 Protection of Sports Grounds/Facilities "It is an objective of the Council to a) Ensure that adequate playing fields for formal active recreation are provided for in new development areas. b) Protect, retain and enhance existing sports facilities and grounds.'

Again this was considered under appeal 323968-25 and the Inspector notes at paragraph 9.7.9:

'The appellant also references Objective SCS1 020 Protection of Sports Grounds/Facilities of the Development Plan, where it is an objective of the Council to ensure that adequate playing fields for formal active recreation are provided for in new development areas and to protect, retain and enhance existing sports facilities and grounds and considers that the proposed development conflicts with this objective. The proposed residential development is located on lands zoned for residential development, and forms part of an existing residential development. Therefore, I do not consider that the proposed development conflicts with this objective, the golf club is on the adjoining lands and does not form part of this application.'
- 5.2.54 In summary we say Objective SCS1 020 is not offended by the proposal, as noted by the planning officer and also the Inspector under the previous appeal adjacent.
- Ground 5: Buffer Zone
- 5.2.55 Response: The site layout incorporates buildings appropriately positioned away from the southern boundary.
- 5.2.56 Furthermore the zoning which pertains to the lands does not have a key site requirement to incorporate such as buffer and the proposal fully complies with the zoning objective to deliver residential on the lands.
- Ground 6: Noise Impact Assessment
- 5.2.57 Response: This is addressed in the EIAR; chapter 12. In summary

'During daytime periods, average noise levels were in the range 56 to 58 LAeq,16hr and 50 and 52 dB LA90, 16hr. During night-time periods, average noise levels were in the range 50 to 52 dB LAeq,8hr and 35 to 39 dB LA90, 8hr. These noise levels are considered representative of noise environment experienced along the north of the site in proximity to the R445 Dublin Road.'
- 5.2.58 In this context there will be no unacceptable noise emissions from the Golf Club on future residents.
- Ground 7: Cumulative Impact
- 5.2.59 Response: At time of writing the EIAR the adjacent permission under appeal decision 323968 was not granted permission. Also the cumulative impacts of both project sites will not impact operations of the Golf Club. Furthermore the Development Plan zonings provide for both residential schemes; they are plan-led.

05 Response to Grounds of Appeal

• Ground 8: EIAR Deficiencies

5.2.60 **Response:** We note the appellant raises several sub-headings and sets out the EIAR is deficient. For conciseness we highlight the Planning Authority when assessing the application included an assessment of the EIAR. We refer to the Planner's report where it states on page 39:

'Having regard to the examination of environmental information contained above and outlined in the EIAR, internal reports and submissions received from prescribed bodies, it is considered that there will be no significant effects on the environment subject to the mitigation measures outlined in the NIS and EIAR submitted with the application documentation.'

5.2.61 In the event that An Coimisiún, as the competent authority, considers that there are matters contained within the EIAR, or the Non-Technical Summary in particular that require further consideration, that is a matter which An Coimisiún can raise with the applicant having regard to Section 126A(4) of the Planning & Development Act 2000, as amended.

• Ground 9: Habitats Directive and Appropriate Assessment

5.2.62 **Response:** The appeal refers to the Groundwater Vulnerability and asks An Coimisiún to be satisfied that no significant effects will arise via construction and impact on the Groundwater pathway.

5.2.63 By way of background we refer to the CEMP, the Water Framework Directive Assessment and how the design proposals and construction mitigation proposals have informed the Natura Impact Statement.

5.2.64 In summary:

- As per the CEMP construction methodology will protect Groundwater at all stages of construction
- At operational stage Groundwater will also be protected by design and SUDS proposals;
- As per the WFD conclusion:

'Following the completion of the WFD impact assessment, it is concluded that the proposed development will not impact on the quality elements of the screened in WFD waterbodies when mitigation measures described in Section 5 of this Report are applied.

The Screening Assessment found three WFD waterbodies with potential pathways from the proposed development. These three WFD waterbodies, Shannon (Lower)_060, Limerick City East groundwater body, and Limerick Dock transitional waterbody were carried forward to the Scoping stage.

The Scoping Assessment found that the proposed development, when considering all aspects of its design including the proposed drainage layout and design measures to be put in place during construction, is not likely to cause a deterioration in WFD status objectives for any of the screened in waterbodies.'

• The NIS also concludes on an evidential basis:

'It is concluded that provided that the mitigation measures outlined are strictly adhered to, adverse effects as a result of the proposed development are not likely to occur on the Lower River Shannon SAC.

To confirm this conclusion, a checklist on methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC from (European Commission 2021) has been completed with regards to conservation objectives in Table 7-1:

5.2.65

In terms of technical assessment by the decision maker (the Planning Authority in this instance) we refer to the legal principles set out in the Judgement 'Michelle Hayes v the Environmental Protection Agency and the Minister for the Environment, Climate and Communications, Ireland and the Attorney General and Irish Cement Limited (2024).

5.2.66

This Judgement is particularly relevant to this application as it sets out the need for a decision maker to make a valid appropriate assessment and reach conclusions on the submissions made to it. We highlight key extracts:

Para 201. 'Earlier in this judgment I have referred to the requirements for a valid appropriate assessment as set out in judgments of the CJEU such as Waddenzee, Commission v Spain and Sweetman v An Bord Pleanála and, in this jurisdiction, in Kelly v An Bord Pleanála. To reiterate, in order for an AA to reach a valid conclusion that there will be no adverse effect on the integrity of an EU site, the assessment must identify and describe all aspects of the development which may affect a European site, it must contain complete, precise and definitive scientific findings and conclusions and not have any gaps or lacunae. Those scientific findings must be capable of supporting the conclusion that no reasonable scientific doubt remains as to the absence of any adverse effect on the integrity of the sites. The potential for such effect will usually have been identified in the course of a preliminary screening exercise.

Para 202. 'Added to these requirements, a number of cases in this area have identified the need for the decision maker to reach conclusions on the submissions made to it and for the statement of reasons for the decision to enable those who made submissions to understand why those conclusions had been reached.'

5.2.67

In summary this Judgement sets out that where expert evidence relevant to the issues arising in the AA process is adduced by any party, that evidence must be considered by the decision-maker and if the evidence is not accepted, it must be apparent from its reasoning process why that was the case.

5.2.68

With JBA's Appropriate Assessment (NIS) and Water Framework Directive Assessment being carried out by qualified and experienced ecologists and environmental consultants there is a robust evidence base to demonstrate, as per the conclusion, that:

'It is concluded that provided that the mitigation measures outlined are strictly adhered to, adverse effects as a result of the proposed development are not likely to occur on the Lower River Shannon SAC.

To confirm this conclusion, a checklist on methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC from (European Commission 2021) has been completed with regards to conservation objectives in Table 7-1:

5.2.69 On these basis we submit appeal ground 9 is unfounded.

• Ground 10: Uisce Éireann Watermain Infrastructure

5.2.70 **Response:** In response the Uisce Éireann Watermain Infrastructure is to remain in-situ. The site layout by Arnold Leahy (and the wider project team) have all been based on this infrastructure remaining in-situ and being undisturbed the proposals. For conciseness we refer to project drawings denoting same and Uisce Éireann are satisfied in this regard.

5.2.71 Finally we would also highlight for An Coimisiún all of the above matters raised by AK Planning in the respective appeal were duly considered by the Planning Authority.

05 Response to Grounds of Appeal

- Appeal 4: A Hersey Planning

5.2.72 The appeal sets out a number of grounds and we address each matter below.

- Ground 1: Overdevelopment and inadequate provision of local services

5.2.73 **Response:** This is addressed in the Schools, Childcare and Social Infrastructure Assessment. As set out in application documents a 10 year permission is sought in this instance and given the delivery of the scheme over several years there will be no immediate demand on Social Infrastructure in the area.

5.2.73 For conciseness we refer An Coimisiún to our assessment on Infrastructure in the area which demonstrates the site is well located for services going forward. We would also highlight a Crèche is proposed to cater for the development with headroom incorporated into same.

5.2.74 Going forward we also highlight the Department of Education carry out annual reviews on future school place demand and we refer to their most recent forecast published in December 2025 (appended to this appeal submission) which demonstrates that even with population growth both primary and post primary school demand falls over the next 20 years.



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- Ground 2: Density

5.2.75 **Response:** This is addressed in the Planning Statement which demonstrates how the density is appropriate for the site. Of relevance we refer An Coimisiún to LRD pre-planning discussions and how the design and density was supported by the Planning Authority, particularly in the context of the Quality Bus Corridor proposed alongside the northern site boundary and the clear policy context that supports the density to make efficient use of this strategic site.

5.2.76 We note the appeal references the estimated yield that was factored into the Limerick City and County Development Plan and which assumed a yield of 508 units from the site.

5.2.77 In response we say this was an estimated yield only, prepared in 2022 as part of the Draft CDP and this estimated yield does not set policy objectives or density provisions for the Development Management process.

5.2.78 In this context and also having regard to the recent Variation no.3 to the Limerick City and County Development Plan (April 2026) which seeks to increase Housing Delivery (in line with the revised NPF and accompanying Section 28 Guidelines 'NPF Implementation: Guidelines for Planning Authorities' we submit the proposed density fully accords with the policy objectives, zoning and Core Strategy of the Limerick City and County Development Plan.

5.2.79 To assist An Coimisiún we highlight the provisions of Variation no.3 now require:

'A minimum net density in the range of 50 to 200 dwelling units per hectare are required at appropriate locations within: 800 metres of (i) the University Hospital; (ii) Raheen Business Park; (iii) National Technology Park; (iv) University Limerick; (v) Technological University of the Shannon; (vi) Mary Immaculate College; (vii) Bons Secours Hospital (viii) 500m of high frequency (min. 10-minute peak hour frequency) existing or proposed urban bus services and; (ix) Compact medium density residential neighbourhoods around the city centre that have evolved over time.'

5.2.80 On this basis and given the urban design proposed wherein the design responds appropriately to the context we say the density is wholly appropriate.

- Ground 3: Scale and Building Height

5.2.81 **Response:** This is addressed in both the Planning Statement and the Design Statement. In summary a net residential density of 53.9p/ha is proposed, which aligns with the Limerick City & County Development Plan 2022-2028 and the Section 28 Guidelines for Sustainable Residential Development and Compact Growth.

5.2.82 This density is considered appropriate for an intermediate and accessible location and supports the efficient use of serviced, zoned lands.

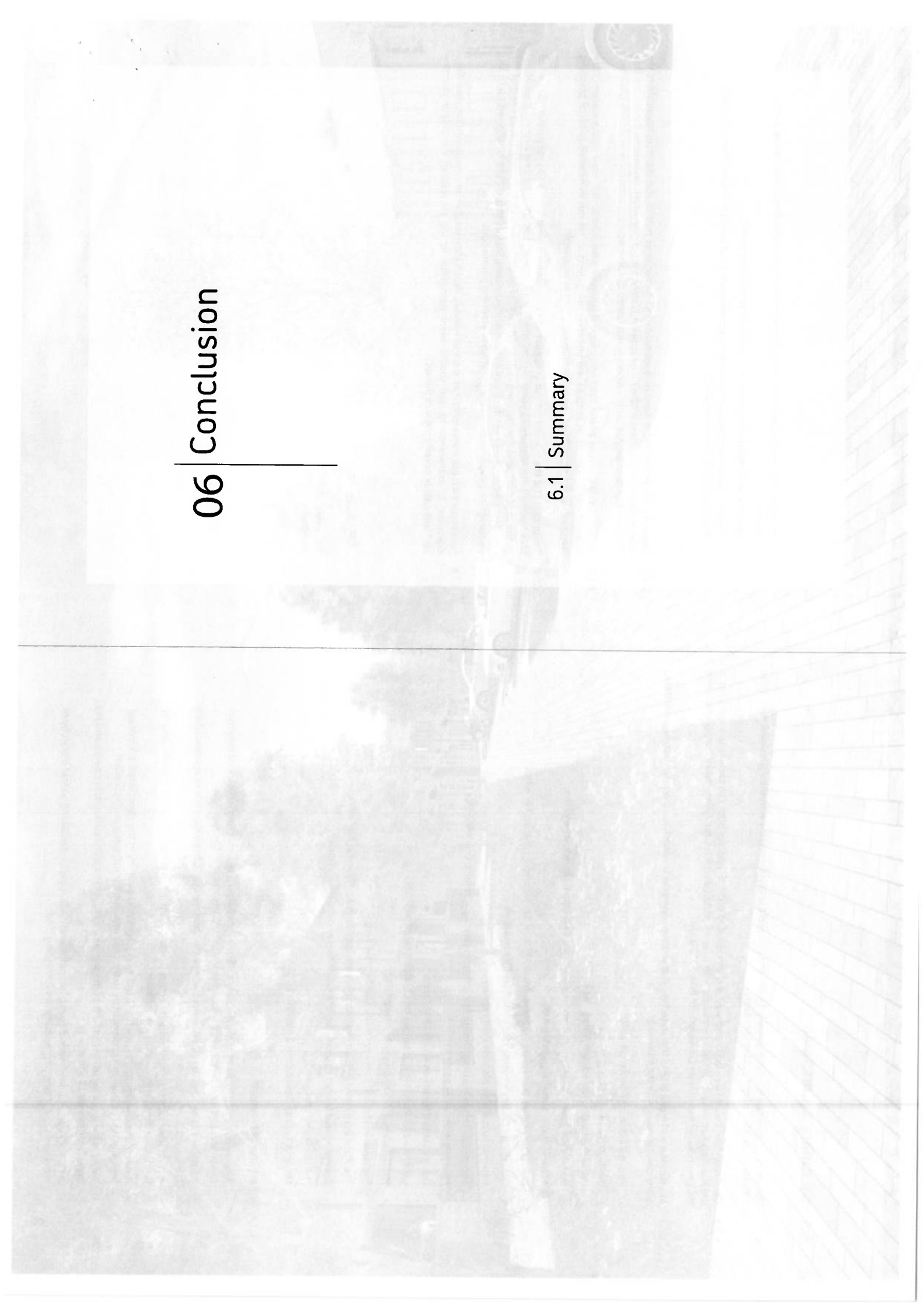
5.2.83 The proposed density achieves a balanced response to national, regional and local policy objectives by delivering compact growth while respecting the site's suburban context and ensuring integration with surrounding residential areas.

5.2.84 In terms of height, the proposal includes a considered mix of 2 to 5-storey buildings, with increased heights concentrated in the core of the site within the apartment blocks. This approach reflects guidance in the CDP and also national policy, promoting higher density in appropriate locations while incorporating a lower height proximate to third party dwellings. Focal buildings are strategically positioned along key routes and frontages to enhance legibility, contribute to placemaking, and support a coherent urban structure.

- Ground 4: Traffic Generation, Road Safety and Transportation Impacts

5.2.85 **Response:** We refer to the Traffic and Transport Assessment, Mobility Management Plan, DMURS Audit and Road Safety Audit which accompany the application now under consideration.

5.2.86 In response we highlight all design standards are incorporated into the layout to ensure no traffic, pedestrian or cyclist safety arises and the local road network has capacity to cater for the proposal.



06 Conclusion

6.1 Summary

6.1 Summary & Conclusion

6.1.1 The attached proposal has been prepared following pre-application discussions with the Planning Authority on 29th May and 9th October 2025 respectively.

6.1.2 The design particulars have been reviewed and amended in order to address both the preliminary opinions of the Planning Authority to ensure compliance with relevant national policies, guidelines and local policies under the Limerick City and County Development Plan 2022-2028.

6.1.3 At a national and regional level this statement and accompanying documents has demonstrated the consistency of the development with the following:

- National Planning Framework 2040
- Housing for All
- Urban Development and Building Heights
- Sustainable Residential Development and Compact Settlement Guidelines and the
- Accompanying Urban Design Manual;
- Delivering Homes, Sustaining Communities (2008) and the accompanying Best Practice
- Guidelines - Quality Housing for Sustainable Communities;
- National Sustainable Mobility Policy (2022)
- Sustainable Urban Housing: Design Standards for New Apartments: Guidelines for
- Planning Authorities 2025;
- Design Manual for Urban Roads and Streets;
- Guidelines for Planning Authorities on Childcare Facilities (2001);
- Habitats Directive - Appropriate Assessment;
- Regional and Spatial Strategy for the Southern Region;
- The Planning System & Flood Risk Management: Guidelines for Planning Authorities;
- Environmental Impact Assessment: EPA Guidelines and the EIA Directive;
- Water Framework Directive;
- Limerick County Development Plan 2022-2028.

6.1.4 We summarise proposals:

- A net residential density of approximately 53.9 units per hectare, representing a balanced response to national and local policy while respecting the suburban context of the site.
- A total of 523 residential units delivered across a 9.7 hectare site, comprising a mix of residential unit types.
- A centrally located crèche designed to meet demand from the development and the wider area, in line with relevant childcare design guidelines.
- A mix of building forms and heights (2 to 5 storeys) providing variety in the streetscape, enhancing legibility, and responding appropriately to the site's topography and surrounding context.
- Public open space equating to 15.9% of the site area, including a central park, pocket parks, and play areas designed for all age groups.
- A DMURS-compliant network of roads, footpaths, and cycle routes, establishing a clear hierarchy of movement and strong permeability to surrounding lands.

- Provision of active frontages throughout to promote passive surveillance and vibrant public spaces.
- All associated infrastructure and service connections incorporated.
- A high-quality, integrated scheme that makes efficient use of zoned land and reflects the site's location, context, and accessibility.

- 6.1.5 Given the foregoing and extensive documentation prepared as part of the planning application, we submit there are no matters arising in the appellants statement of case which undermine the conclusions set out in the Planning Authority's report which deems the development acceptable in planning terms.
- 6.1.6 On our detailed review of the third party appeal submitted we submit that none of the matters raise material considerations so as to offend planning policy tests as set out in relevant national planning standards or the respective County Development Plan as applicable.
- 6.1.7 To conclude for the reasons set out in application documents a we submit a 10 year permission period is considered appropriate to cover factors which may arise and which would be beyond the control of the applicant (and the Planning Authority) such as an unforeseen global conflict or a repeat of the Covid pandemic, either of which would be macroeconomic factors that should be allowed for in any construction programme and the duration of planning permissions
- 6.1.8 In summary it is our contention that, once all relevant information is taken into consideration, then the Coimisiún is empowered to, and should, grant permission in the interests of the proper planning and sustainable development of the area.



Ronan Woods
Director



www.genesisplanning.co.uk
info@genesisplanning.co.uk

T: (+44) 2830 493 001
T: (+353) 45 571 862



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Department of Education
and Youth

National Projections of full-time enrolment

Primary & Post-Primary Level
2025/26 – 2044/45

December 2025

Prepared by the Department of Education and Youth
Statistics Unit

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1 Introduction

This report presents the latest set of projections of full-time enrolment in primary and post-primary schools aided¹ by the Department of Education and Youth. It updates the previous set of projections published in March 2024 and provides projections (not predictions) of pupils nationally to 2044/45, assuming recent trends in fertility and migration were to continue. The enrolment levels serve as a baseline used in other models, for example, in teacher demand and supply modelling.

The enrolment projection model is based on the Central Statistics Office's (CSO) national² projections which were updated in July 2024. While projections are presented for three migration scenarios, the Department believes that the M1F2 scenario is the most likely outcome. This assumes that high rates of migration will continue, and that fertility will gradually decrease from the current rate of 1.55 to 1.3 in 2037.

Changes in both primary and post-primary schools are directly related to changes in the population they serve. Residential development and inward migration can create pressure on enrolment in certain areas, even as enrolments in other areas are declining. Moreover, closures due to falling enrolment numbers can exert pressure for additional places in schools with larger enrolment numbers. Therefore, it is important to recognise that enrolment at local levels may not align with national trends. The enrolment figures contained in this report are to be taken strictly as projections only, they are not to be confused with official enrolment figures, which are published separately.³

2 Assumptions

Traditionally this report has presented results with two fertility and three migration scenarios, producing six sets of tables. This multiple scenario approach is more suited to projection models that are run less frequently (for example, every five years) to enable the user to select the scenario that is arising in between releases. The Department undertakes to revise its enrolment projections on a more regular basis (generally every one or two years). This increased frequency along with the fact rising fertility ("F1") is thought to be highly unlikely,

¹ Aided means state funded. For the primary sector this includes religious schools, non-denominational schools, multi-denominational schools and Gaelscoileanna (Irish-medium schools). A small number of private primary schools (35 in 2024) are not state funded, and they are excluded from this analysis. In the post-primary sector fee charging schools are included but not private 'grind' colleges.

² CSO National Projections, see - <https://www.cso.ie/en/releasesandpublications/ep/p-plfp/populationandlabourforceprojections2023-2057/>

³ Official enrolment figures are available here: <https://www.gov.ie/en/department-of-education/publications/education-statistics/> and via the CSO <https://data.cso.ie/table/EDA42> and <https://data.cso.ie/table/EDA69>

means that only a single fertility scenario, specifically, falling fertility ("F2"), is now presented. This will be kept under review when updating projections.

Future births are projected based on the CSO projections of females aged between 15 – 49. The number of births each year is calculated based on the current fertility rate for each age and the overall projected Total Fertility Rate. The number of births is smoothed to be in line with the academic year. Entrants into junior infants are calculated based on the number of 4-, 5-, and 6-year-olds each year. Migration assumptions and transfers between private schools, special schools, and home schooling are applied for each standard. Students carry over from one standard to the next each year, accounting for repeats and retention rates in post-primary schools.

2.1 Fertility

Annual births have fallen by over 20,000 in the last number of years, from their recent peak of 75,550 in 2009 to 54,418 in 2023. While the decrease in absolute number of births is not unusual, with a very similar drop seen between 1980 and 1995, the Total Fertility Rate (TFR) has fallen from 3.23 in 1980 to 2.06 in 2009, and continues to fall. Aligning with CSO projections, the TFR is set to start at 1.55 in 2023, decrease gradually to 1.3 in 2038, and is then held constant for the remainder of the projections⁴.

2.2 Migration

Migration has a large impact on enrolment figures. Historical migration is extracted from the primary online database (POD) and the post-primary online database (PPOD) and analysed. Inflows consist of students entering school from Northern Ireland and abroad, and transfers from home schooling, special schools, and private schools. Post-primary outflow is estimated based on the results of the annual retention report.

Enrolments of Ukrainian students have held relatively steady in the 2024/25 school year, with 17,495 students in October 2024 and 17,488 in May 2025. The M1 migration scenario assumes that there will be net zero migration of Ukrainian students. M2 and M3 include 10% and 40% of students returning to Ukraine respectively over the next three years. A scenario with high rates of return is currently thought unlikely – in a survey held in 2024, 53% of respondents stated they want to stay in Ireland permanently⁵.

⁴ CSO National Projections, see - <https://www.cso.ie/en/releasesandpublications/ep/p-plfp/populationandlabourforceprojections2023-2057/fertilityassumptions/>

⁵ Largest survey to date of Ukrainians in Ireland who found protection from war Subject – "Employment". [Ukrainian Action in Ireland](#)

More details on assumptions and how they are reflected in the model can be found in the appendix.

3 National Projections

3.1 Primary

Enrolments in primary schools in Ireland stood at 552,059⁶ in September 2024, a decrease of 4,047 pupils compared to the previous school year 2023/24. Since the peak in 2018/19 (567,772 pupils), enrolments had been decreasing in line with school age demographic trends until 2022/23, when numbers rose due to increased inward migration.

Under all scenarios, enrolments are projected to fall until 2040/41, before beginning to rise again. Enrolments under the M1F2 scenario will reach a low of 481,536, a decrease of over 70,500 from September 2024.

Table 1: Projected enrolments in primary schools, 2025/26 – 2044/45

	M1F2	M2F2	M3F2
2024/25	552,059	552,059	552,059
2025/26	549,026	548,739	546,308
2026/27	546,030	542,587	537,363
2027/28	540,307	536,924	529,251
2028/29	534,460	530,645	522,126
2029/30	527,512	523,366	514,188
2030/31	521,112	516,733	507,087
2031/32	514,455	509,945	500,012
2032/33	508,019	503,273	493,544
2033/34	501,097	495,339	486,254
2034/35	494,392	488,859	480,313
2035/36	489,101	482,460	474,261
2036/37	485,832	479,068	471,021
2037/38	483,699	476,857	468,926
2038/39	482,315	475,425	467,571
2039/40	481,603	474,687	466,870
2040/41	481,536	474,620	466,801
2041/42	481,898	474,981	467,164
2042/43	482,730	475,813	467,996
2043/44	484,254	477,337	469,520
2044/45	486,469	479,553	471,735

⁶ School 19599A has previously not been included in the bulletin or projection report. It is included in the 2024/25 bulletin and final enrolment figures, giving total primary enrolments of 552,116.

3.1.1 Annual rises and falls

Table 2 presents the projected annual changes in enrolment out to the 2044/45 school year. The sharpest decline will be seen over the next two to nine years, depending on the migration scenario. The average decrease per annum for the period covering the 2024/25 school year to the 2034/35 school year is projected:

- around 5,800 decrease in pupil enrolments per annum under M1F2
- around 6,300 decrease per annum under M2F2
- around 7,200 decrease per annum under M3F2

Therefore, the net decrease in primary level for this same period is projected to be between 57,700 and 71,800 pupils depending on how migration trends unfold.

Table 2: Projected absolute annual change in primary schools, 2025/26 – 2044/45

	M1F2	M2F2	M3F2
2024/25	-4,047	-4,047	-4,047
2025/26	-3,033	-3,320	-5,751
2026/27	-2,996	-6,152	-8,945
2027/28	-5,723	-5,663	-8,112
2028/29	-5,847	-6,279	-7,125
2029/30	-6,948	-7,279	-7,938
2030/31	-6,400	-6,633	-7,101
2031/32	-6,657	-6,788	-7,075
2032/33	-6,436	-6,672	-6,468
2033/34	-6,922	-7,934	-7,290
2034/35	-6,705	-6,480	-5,941
2035/36	-5,291	-6,399	-6,052
2036/37	-3,269	-3,392	-3,240
2037/38	-2,133	-2,211	-2,095
2038/39	-1,384	-1,432	-1,355
2039/40	-712	-738	-701
2040/41	-67	-67	-69
2041/42	362	361	363
2042/43	832	832	832
2043/44	1,524	1,524	1,524
2044/45	2,215	2,216	2,215

3.1.2 Projections by standard

Table 3 shows national projections by standard under the M1F2 scenario. Intake into Junior Infants is projected to decrease by over 5,800 to 54,887 over the next 11 years before starting to rise again in 2036/37.

Table 3: Projected enrolments (M1F2) in primary schools, by standard, 2025/26 – 2044/45

	Junior Infants	Senior Infants	First Class	Second Class	Third Class	Fourth Class	Fifth Class	Sixth Class
	60,715	62,632	64,666	66,192	66,461	68,771	69,806	69,819
2025/26	61,304	60,970	63,109	65,156	66,712	67,040	69,376	70,461
2026/27	61,211	61,513	61,656	63,773	65,859	67,453	67,811	70,161
2027/28	59,805	61,211	61,953	62,086	64,240	66,372	67,986	68,366
2028/29	57,879	59,816	61,652	62,379	62,553	64,754	66,906	68,538
2029/30	56,928	57,902	60,263	62,080	62,844	63,068	65,288	67,461
2030/31	56,394	56,951	58,353	60,694	62,545	63,355	63,602	65,845
2031/32	55,959	56,481	57,448	58,829	61,161	63,104	63,941	64,159
2032/33	55,444	55,948	56,815	57,777	59,155	61,621	63,546	64,340
2033/34	55,135	55,435	56,282	57,144	58,102	59,616	62,064	63,946
2034/35	54,955	55,127	55,770	56,612	57,469	58,561	60,059	62,466
2035/36	54,887	54,948	55,462	56,101	56,937	57,928	59,003	60,462
2036/37	54,908	54,880	55,284	55,792	56,426	57,395	58,369	59,405
2037/38	54,988	54,900	55,216	55,614	56,117	56,884	57,836	58,771
2038/39	55,107	54,979	55,235	55,546	55,938	56,575	57,324	58,238
2039/40	55,245	55,098	55,315	55,565	55,870	56,396	57,015	57,726
2040/41	55,381	55,235	55,433	55,644	55,889	56,328	56,836	57,417
2041/42	55,502	55,370	55,570	55,762	55,969	56,347	56,767	57,238
2042/43	55,795	55,490	55,705	55,899	56,087	56,426	56,786	57,169
2043/44	56,421	55,781	55,825	56,034	56,223	56,544	56,865	57,188
2044/45	57,136	56,403	56,115	56,154	56,358	56,680	56,983	57,267

Figure 1 presents projected enrolments under the three scenarios, including extended projections out to 2057/58. This longer-term projection illustrates how the projected fall in enrolment will be temporary in nature but may not return to the previous peaks due to a lower fertility rate.

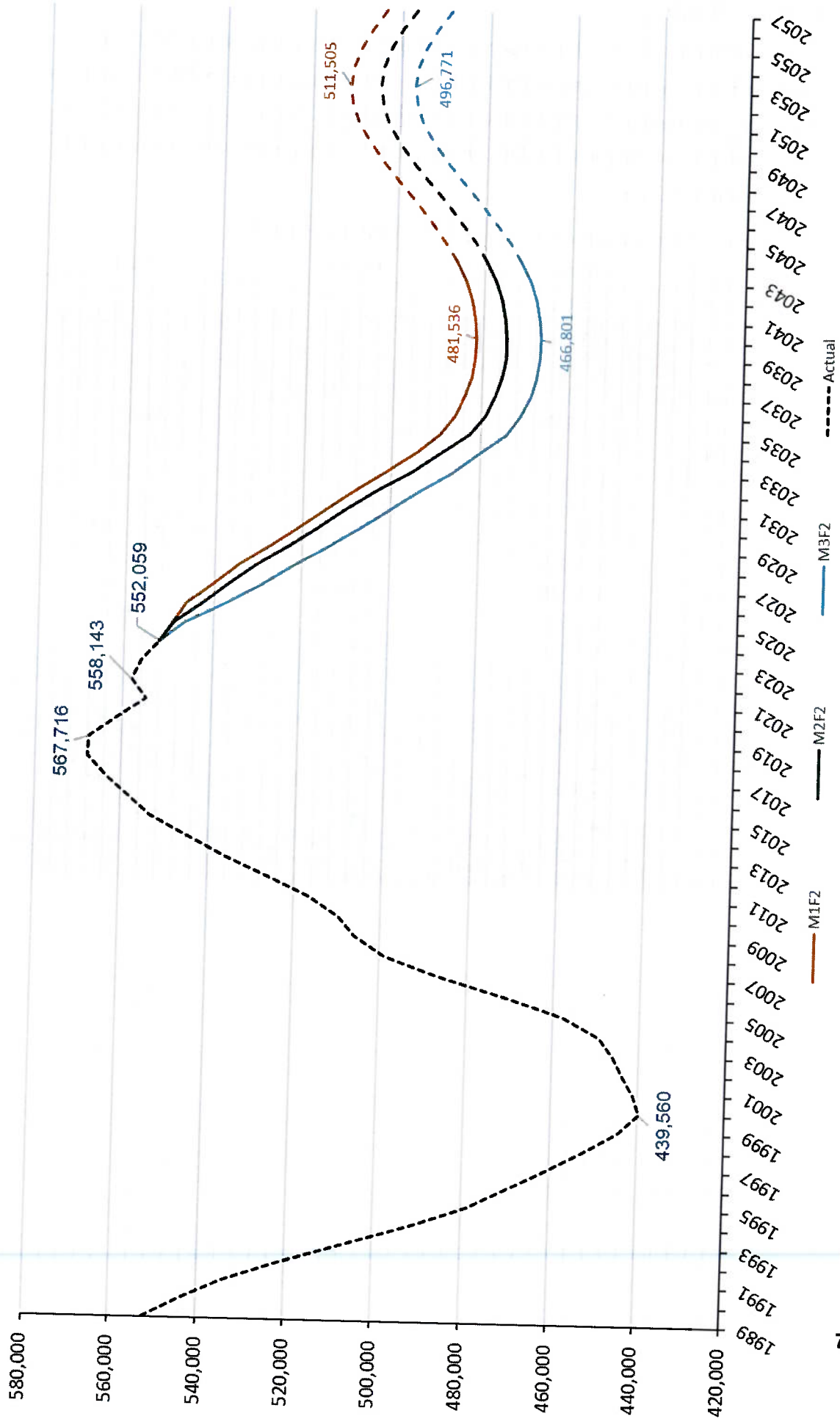


Figure 1: Past and projected enrolments (M1F2) in primary schools, 1989/90 – 2057/58

3.2 Post-Primary

Post-primary school enrolments have risen by almost 54,000 pupils since 2019/20, an increase of 14.5% in the last 5 years. Enrolments are expected to peak in 2025/26 under all three migration scenarios, with 429,350 students under the M1F2 scenario. From 2026/27 onwards, enrolments are projected to fall over the coming years, with a decrease of over 78,000 over the next 20 years.

Table 4: Projected enrolments in post-primary schools, 2025/26 – 2044/45

	M1F2	M2F2	M3F2
2024/25	425,411	425,411	425,411
2025/26	429,350	427,774	425,918
2026/27	429,057	425,493	421,027
2027/28	423,559	417,932	410,903
2028/29	418,312	411,554	403,370
2029/30	413,683	405,883	396,551
2030/31	410,330	401,611	391,158
2031/32	406,276	396,779	385,255
2032/33	400,376	390,175	377,590
2033/34	395,455	385,574	371,691
2034/35	391,338	380,640	365,762
2035/36	385,961	375,882	360,389
2036/37	379,680	369,297	353,574
2037/38	373,817	363,197	347,464
2038/39	368,508	357,500	342,012
2039/40	362,797	351,150	336,200
2040/41	357,299	345,521	331,028
2041/42	353,023	340,476	326,265
2042/43	350,214	337,551	323,477
2043/44	348,252	335,525	321,547
2044/45	346,899	334,132	320,215

3.2.1 Annual rises and falls

Table 5 presents the projected annual changes in enrolment out to 2044/45. As enrolments at primary level are projected to decrease, this will begin to carry over into post-primary level after the peak in 2025/26. Looking at the averages for the 10 year period covering the 2026/27 school year to the 2035/36 school year, the following decreases are projected:

- Around 4,300 decrease in pupil enrolments per annum under M1F2
- Around 5,200 decrease per annum under M2F2
- Around 6,550 decrease per annum under M3F2

The net loss for the period therefore is projected between 43,300 and 65,500 less pupils in post-primary.

Table 5: Projected absolute annual change (M1F2) in post-primary schools, 2025/26 – 2044/45

	M1F2	M2F2	M3F2
2024/25	8,981	8,981	8,981
2025/26	3,938	2,362	506
2026/27	-293	-2,281	-4,891
2027/28	-5,498	-7,561	-10,124
2028/29	-5,247	-6,378	-7,533
2029/30	-4,629	-5,671	-6,819
2030/31	-3,353	-4,272	-5,393
2031/32	-4,054	-4,832	-5,903
2032/33	-5,900	-6,604	-7,665
2033/34	-4,921	-4,601	-5,899
2034/35	-4,117	-4,934	-5,929
2035/36	-5,377	-4,758	-5,373
2036/37	-6,281	-6,585	-6,815
2037/38	-5,863	-6,100	-6,110
2038/39	-5,309	-5,697	-5,452
2039/40	-5,711	-6,350	-5,812
2040/41	-5,498	-5,629	-5,172
2041/42	-4,276	-5,045	-4,763
2042/43	-2,809	-2,925	-2,788
2043/44	-1,962	-2,026	-1,930
2044/45	-1,353	-1,393	-1,332

3.2.2 Projections by standard

Table 6 presents projections for each year by programme type under the M1F2 scenario. The number of students entering 1st Year is projected to fall by over 13,500 from the 2024/25 peak of 73,237 to 59,681 over the next 20 years. For 6th Year, there will be an additional 7,865 students in 2026/27 than in 2024/25.

Table 6: Projected enrolments (M1F2) in post-primary schools, by standard, 2025/26 – 2044/45

	JC1	JC2	JC3	TY	LC1	LC2 (+ repeats)
2024/25	73,237	76,265	75,685	60,520	74,358	65,347
2025/26	72,189	73,816	76,566	59,085	77,456	70,238
2026/27	72,906	72,770	74,139	59,729	76,300	73,212
2027/28	72,365	73,252	72,872	57,210	75,781	72,078
2028/29	70,640	72,747	73,405	56,284	73,426	71,810
2029/30	70,880	71,035	72,905	56,673	72,628	69,561
2030/31	69,872	71,269	71,207	56,307	72,883	68,792
2031/32	68,326	70,269	71,436	55,065	72,146	69,033
2032/33	66,643	68,734	70,446	55,233	70,991	68,330
2033/34	66,823	67,060	68,922	54,508	70,916	67,225
2034/35	66,430	67,235	67,260	53,393	69,869	67,150
2035/36	64,952	66,845	67,432	52,178	68,403	66,151
2036/37	62,951	65,378	67,045	52,303	67,253	64,749
2037/38	61,895	63,389	65,590	52,021	67,275	63,646
2038/39	61,262	62,337	63,617	50,956	66,672	63,663
2039/40	60,730	61,707	62,571	49,513	65,188	63,087
2040/41	60,219	61,177	61,945	48,748	63,541	61,670
2041/42	59,910	60,669	61,419	48,289	62,643	60,093
2042/43	59,731	60,362	60,914	47,905	62,072	59,230
2043/44	59,662	60,184	60,609	47,535	61,580	58,682
2044/45	59,681	60,115	60,432	47,312	61,149	58,211

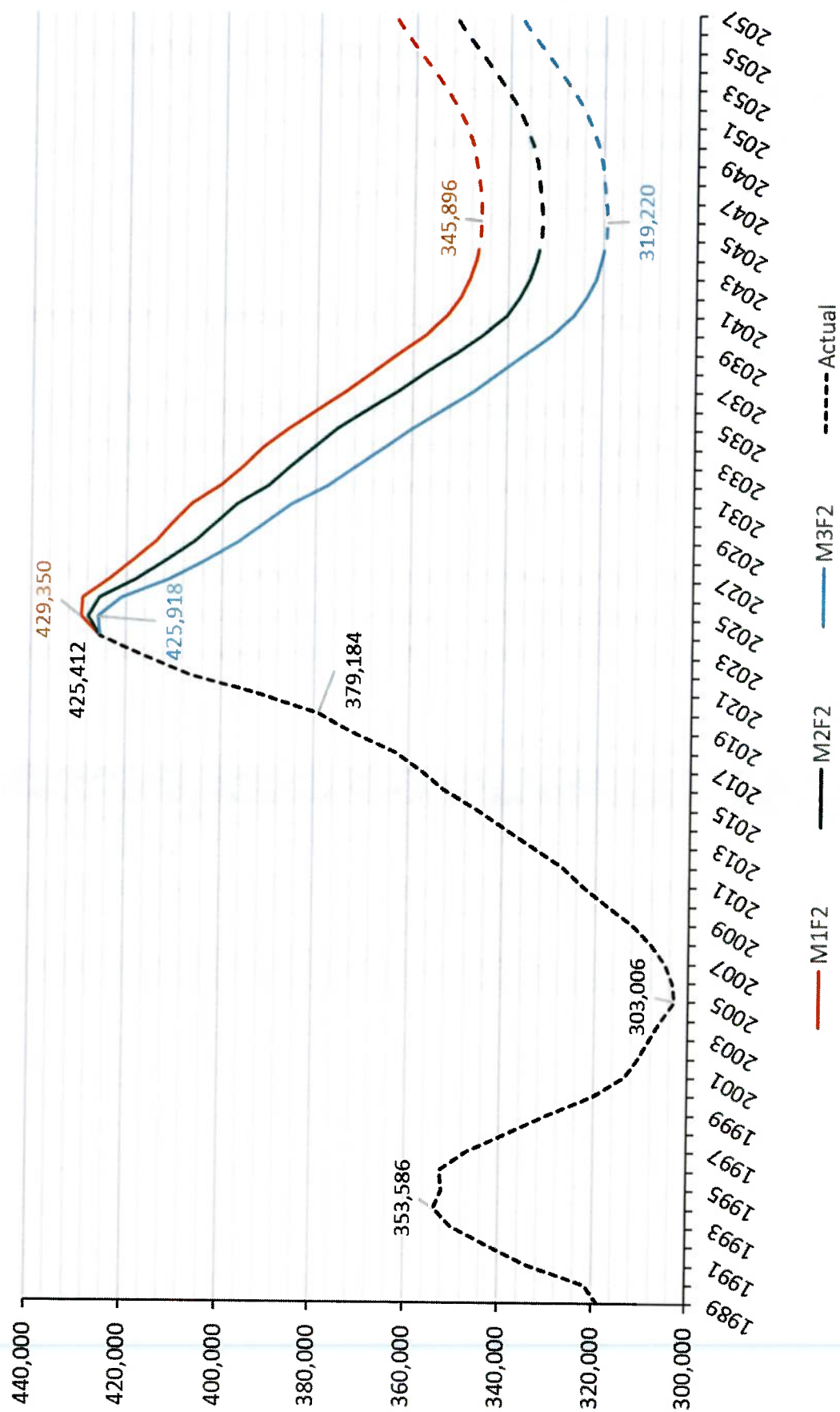


Figure 2: Past and projected enrolments (M1F2) in post-primary schools, 1989/90 – 2057/58

4 Review of 2023 Projections

This section presents a short review of the last published projections and outlines the updates to the projected figures made for the 2025 iteration.

The percent error of a prediction is defined as follows:

$$\frac{|Predicted\ Value - Actual\ Value|}{Actual\ Value} * 100$$

Table 18 shows the actual enrolment in 2024/25 at primary and secondary level compared to the projected values.

Enrolments at primary level were under-projected by 2,452. The majority of the difference was at Junior Infants and special education. The model has been updated to include migration of under 4s and has increased the rate of special education to match recent trends.

Enrolments at post-primary level were over-projected by 2,289. Some of this was due to under-projecting TY, and over-projecting at LC1. A large number of students were coming to Ireland to take TY but leaving before entering LC1. The model has been updated to account for this.

Table 18: Projected vs actual enrolments, 2024/25

2024/25		
Education level	Primary	Post-Primary
Actual enrolment	552,059	425,412
Most likely scenario (M1F2)	549,633	428,723
Difference	-2,426	+3,310
Percent error	-0.44% (under-projection)	+0.77% (over-projection)

5 Appendix

The following sections provide further information on the main assumptions and how they are integrated into the national model.

5.1 Migration

The most recent estimates of migration published by the CSO show net inward migration of 79,300 in the year up to April 2024, a slight increase from 77,700 in April 2023. Excluding the recent dip in migration due to the pandemic, this is the tenth consecutive year to show strong net inward migration, although the rate of increase appears to be decreasing.

Migration at primary level has been high in recent years, with net inward migration at almost 6,000 in 2023/24 and 4,600 in 2022/23, excluding Ukrainian pupils. These are higher than the numbers during the COVID-19 pandemic, which were 1,900 in 2021/22 and 1,400 in 2020/21. Due to this, and CSO projections of lower migration in the coming years, all primary assumptions are high in the short-term before falling over the coming years.

Table 19: Primary migration assumptions

	2025/26	2026/27	2027/28 – 2031/32	2032/33 – 2057/58
M1	6,500	6,000	4,300	3,500
M2	5,500	5,000	3,500	2,500
M3	4,000	3,500	2,000	1,300

Migration of those under four years of age has traditionally not been included in the model, as it is difficult to estimate. This is one factor that affects projections of enrolments in Junior Infants, causing them to be underestimated. To try account for this, a proportion of the CSO projections by single year of age were added to the Junior Infants entrance cohort.

Table 20: Under 4 migration assumptions

M1	M2	M3
1,080	780	480

Inward migration at post-primary level is based on the average inwards migration between 2020 and 2024 (8,261). In previous projections M2 was taken as the average flow from the previous few years, M1 was 1.5 times M2 and M3 was 0.5 times M2. To keep in line with overall migration assumptions (remaining high in short term and then falling), the methodology has been changed slightly.

Table 21: Post-primary migration assumptions

	2025/26 – 2026/27	2027/28 – 2057/58
M1	10,326 (1.25*average)	8,261 (average)
M2	8,261 (average)	6,196 (0.75*average)
M3	6,196 (0.75*average)	4,131 (0.5*average)

For outflows the retention rate, as published by the Department annually, is used. However, using this method alone it is not possible to account for international students who stay for less than a year. This is particularly common in Transition Year (TY) – 55% of new TY entrants from outside Ireland in 2023/24 left before starting 5th Year. The model has been adjusted to account for these leavers.

Table 22: Percentage of new post-primary entrants from outside Ireland who left the country the same year, by standard

	2021/22	2022/23	2023/24
JC1	14%	12%	11%
JC2	28%	26%	30%
JC3	44%	34%	38%
TY	48%	50%	55%
LC1	44%	40%	49%
LC2	14%	13%	19%

In 2024/25 the number of Ukrainian pupils has held relatively steady, with 17,495 students in October 2024 and 17,499 in May 2025. M1 assumes net zero migration from Ukraine, and that all Ukrainian pupils will stay in Ireland. The M2 and M3 scenario assume that 10% and 40% of Ukrainian pupils return home over the next three years.

Table 23: Ukrainian migration assumptions

	Primary			Post-Primary		
	2025/26	2026/27	2027/28	2025/26	2026/27	2027/28
M1	0	0	0	0	0	0
M2	- 210	- 420	- 420	- 140	- 280	- 280
M3	- 840	- 1,680	- 1,680	- 560	- 1,120	- 1,120

5.2 Fertility

The TFR in Ireland fell from 2.06 in 2009 to 1.7 in 2022. Aligning with CSO projections, the TFR is set to start at 1.55 in 2023, decrease gradually to 1.3 by 2038, and is then held constant for the remainder of the projections. The impact of recently increased migration on births is unknown and has not been factored into this iteration of the model.

Projected births are smoothed to align with the academic year. Births are projected to decline until 2030/31 before starting to rise again.

Table 24: Projected smoothed births by year, 2025/26 – 2044/45

2025/26	56,457	2035/36	55,874
2026/27	56,012	2036/37	55,958
2027/28	55,665	2037/38	56,531
2028/29	55,445	2038/39	57,233
2029/30	55,337	2039/40	57,870
2030/31	55,336	2040/41	58,433
2031/32	55,395	2041/42	58,895
2032/33	55,501	2042/43	59,233
2033/34	55,625	2043/44	59,425
2034/35	55,755	2044/45	59,461

5.3 Deaths

Assumptions on deaths are taken directly from the CSO projections for each single year of age. The effect of deaths on the overall projections is negligible given the small number of deaths (about 110 every year) involved.

5.4 Special education

Students enrolled in special classes and special schools, being a subset of the total student demographics, were previously estimated as a percentage of projected total enrolment. In this model however, the number of students in special schools and special classes is projected based on number of places allocated. This means that there is the same number of students in special education regardless of migration assumption. It is also important to note the model does not project the number of pupils with additional education needs that are enrolled in mainstream classes, only pupils in special schools and special classes are included in the modelling framework.

Table 25: Projections of students in special education, 2024/25 – 2042/43

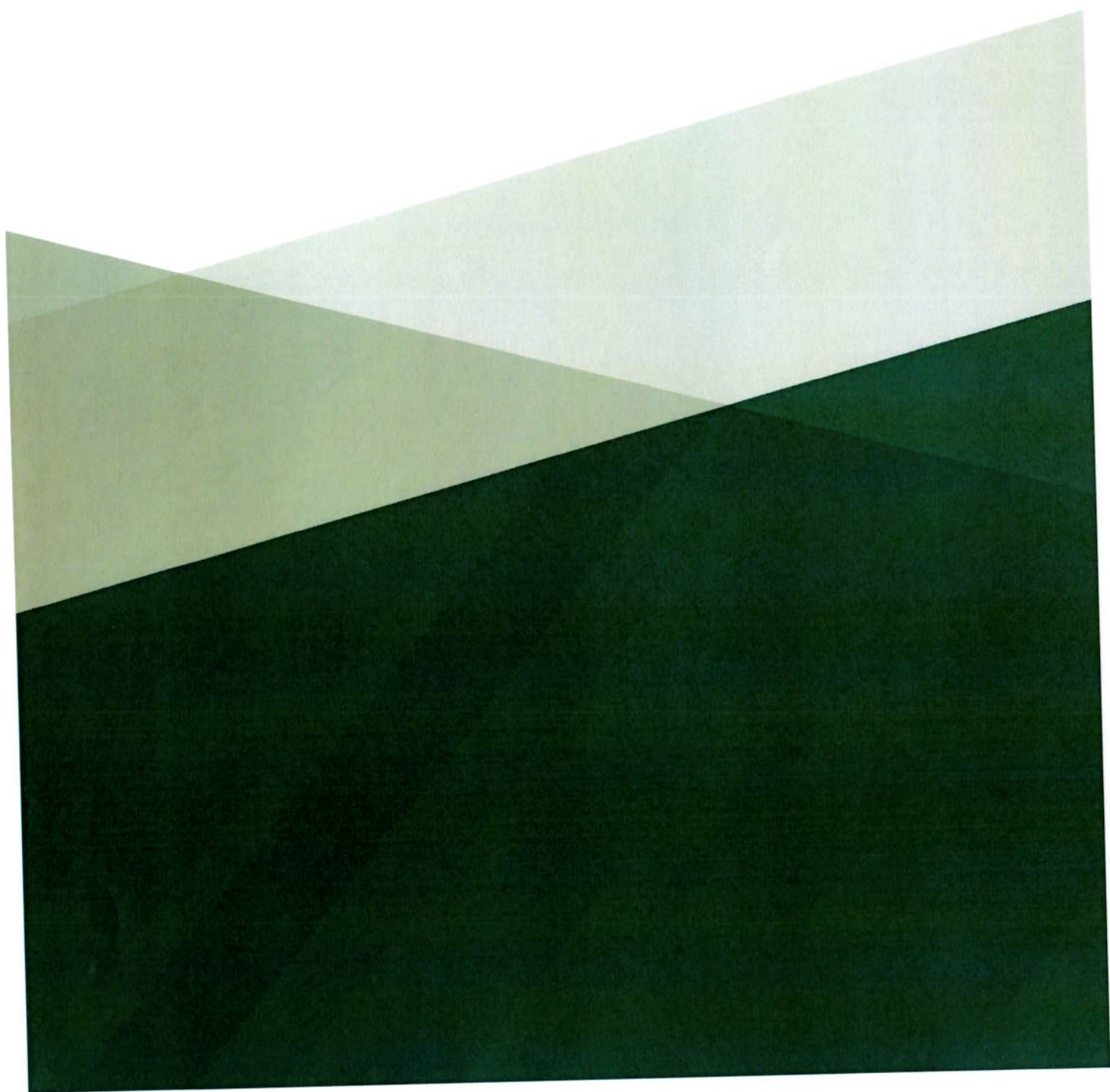
	Special Schools	Special primary classes	Special post-primary classes	% of total M1F2 enrolment
2024/25	9,680	13,317	5,437	2.6%
2025/26	9,980	14,918	6,062	3.2%
2026/27	10,280	16,313	7,457	3.5%
2027/28	10,580	17,708	8,852	3.9%
2028/29	10,880	19,103	10,247	4.2%
2029/30	11,180	20,498	11,642	4.6%
2030/31	11,480	21,893	13,037	5.0%
2031/32	11,480	21,893	13,037	5.0%
2032/33	11,480	21,893	13,037	5.1%
2033/34	11,480	21,893	13,037	5.2%
2034/35	11,480	21,893	13,037	5.2%
2035/36	11,480	21,893	13,037	5.3%
2036/37	11,480	21,893	13,037	5.4%
2037/38	11,480	21,893	13,037	5.4%
2038/39	11,480	21,893	13,037	5.5%
2039/40	11,480	21,893	13,037	5.5%
2040/41	11,480	21,893	13,037	5.5%
2041/42	11,480	21,893	13,037	5.6%
2042/43	11,480	21,893	13,037	5.6%
2043/44	11,480	21,893	13,037	5.6%
2044/45	11,480	21,893	13,037	5.6%

5.5 Other Primary level factors

A number of other factors, which have a smaller impact on overall figures at primary level, are included in the model, including transfers to and from the private sector and special education, as well as repeat rates in junior infants and 6th class in primary school.

5.6 Post Leaving Certificate Students

The projected enrolments refer to the school-based enrolments up to Leaving Certificate only and do not include PLC (Post Leaving Certificate) students.



Lisa Quinn

From: Communications
Sent: Friday 12 June 2026 12:24
To: Appeals2
Subject: FW: Appeal 324286-26
Attachments: Cover letter (Appeal 324286).pdf; Appeal Response Statement (324286).pdf

Follow Up Flag: Follow up
Flag Status: Completed

From: Ronan Woods <ronan@genesisplanning.co.uk>
Sent: Friday 12 June 2026 12:02
To: Appeals2 <appeals@pleanala.ie>; Bord <bord@pleanala.ie>
Subject: Appeal 324286-26

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

Hi appeals

On behalf of the applicant, Columbia Estates Management Ltd, please find attached our statement of response to the 3rd party appeals and your letters dated 21st and 27th May 2026.

If an acknowledgement can be issued by reply.

Thanks again

Ronan Woods/Director
Genesis Planning Consultants

E: ronan@genesisplanning.co.uk
W: www.genesisplanning.co.uk

T: 02830493001 (NI)
A: Dean Swift Building, Armagh Business Park, Hamiltonsbawn Road, Armagh, BT60 1HW
T: 045 571 862 (ROI)

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An Coimisiun Pleanála
64 Marlborough Street
Dublin 1
D01 V902

12th June 2026

Re: Appeal reference 324286
Planning Authority: Limerick City & County Council (reference 2660241)
Decision date: 28th April 2026

Dear Sir/Madam,

In relation to the above matter and on behalf of the applicant, Columbia Estates Management Ltd, please find enclosed our statement of response to the third party appeals submitted.

For reference by the Coimisiun we also refer to an E copy of application documents as submitted to the Planning Authority under application and which are available to view on the LRD project website:

www.monaleenroadlrd.com

We trust that this information is to your satisfaction.

Yours sincerely,

A handwritten signature in black ink, appearing to read "R. Woods".

Ronan Woods
Director

Darragh Burke

From: Ronan Woods <ronan@genesisplanning.co.uk>
Sent: Thursday 18 June 2026 17:39
To: Appeals2
Subject: FW: Appeal 324286-26
Attachments: Cover letter (Appeal 324286) (Submission by Genesis Planning).pdf; Appeal Response Statement (324286)(18-6-26 submission by Genesis Planning on behalf of applicant).pdf

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

Hi Suzanne

As per call earlier today please find attached our revised appeal submission which solely addresses the appeal by A Hersey Planning & appeal by P&T Boland. For both of these appeals your letter was dated 27th May; so we are clearly inside the 4 week window.

If you can confirm this is valid & received by reply.

We also look forward to confirmation that our earlier submission dated 12th June remains valid. Should the Coimisiun deem that any of the appeals addressed therein were outside the 4 week window then at the very least the remaining 3no. appeals should be considered as per our submission.

To clarify in terms of chronology:

- Appeal by P Gerard Boland: dated 15th May; your letter was dated 15th May, received by this office on 19th May & response submitted 12th June
- Appeal by AK Planning: dated 20th May; your letter was dated 21st May; received by this office on 24th May & response submitted 12th June
- Appeal by A Hersey Planning: dated 22nd May; your letter was dated 27th May; received by this office on 30th May & response submitted 12th June
- Appeal by P & T Maloney: dated 25th May; your letter was dated 27th May; received by this office on 30th May & response submitted 12th June

Regards,

Ronan Woods/Director
Genesis Planning Consultants

E: ronan@genesisplanning.co.uk

W: www.genesisplanning.co.uk

T: 02830493001 (NI)

A: Dean Swift Building, Armagh Business Park, Hamiltonsbawn Road, Armagh, BT60 1HW

T: 045 571 862 (ROI)

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From: Ronan Woods

Sent: 12 June 2026 12:02

To: 'Appeals2' <appeals@pleanala.ie>; 'bord@pleanala.ie' <bord@pleanala.ie>

Subject: Appeal 324286-26

Hi appeals

On behalf of the applicant, Columbia Estates Management Ltd, please find attached our statement of response to the 3rd party appeals and your letters dated 21st and 27th May 2026.

If an acknowledgement can be issued by reply.

Thanks again

Ronan Woods/Director
Genesis Planning Consultants

E: ronan@genesisplanning.co.uk

W: www.genesisplanning.co.uk

T: 02830493001 (NI)

A: Dean Swift Building, Armagh Business Park, Hamiltonsbawn Road, Armagh, BT60 1HW

T: 045 571 862 (ROI)

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An Coimisiun Pleanála
64 Marlborough Street
Dublin 1
D01 V902

18th June 2026

Re: Appeal reference 324286
Planning Authority: Limerick City & County Council (reference 2660241)
Decision date: 28th April 2026

Dear Sir/Madam,

In relation to the above matter and on behalf of the applicant, Columbia Estates Management Ltd, please find enclosed our statement of response to the third party appeals submitted. Please note this appeal submission is being made specifically in relation to appeals by:

- Thomas & Pam Moloney (Appeal date 25th May and ACP Letter was issued 27th May 2026); we are inside the four week period for a response to be made.
- A Hersey (Appeal date 22nd May and ACP Letter was issued 27th May 2026); we are inside the four week period for a response to be made.

We submit this appeal response as individual responses to the above appeals, as your letter dated 15th June 2026 returned our previous submission. We have also discussed this with Suzanne in your office today; 18th June 2026 who advised that we address the above appeals today, as per this submission.

We would also ask the Coimisiun to review the contents of your letter dated 15th June wherein the collective submission from this practice was returned. In response we request our original submission is considered going forward, as this was indicated to us by your office that the four week window expires only after the last 3rd party appeal was lodged and your corresponding letter issued thereafter.

For reference by the Coimisiun we also refer to an E copy of application documents as submitted to the Planning Authority under application and which are available to view on the LRD project website:

www.monaleenroadlrd.com

We trust that this information is to your satisfaction.

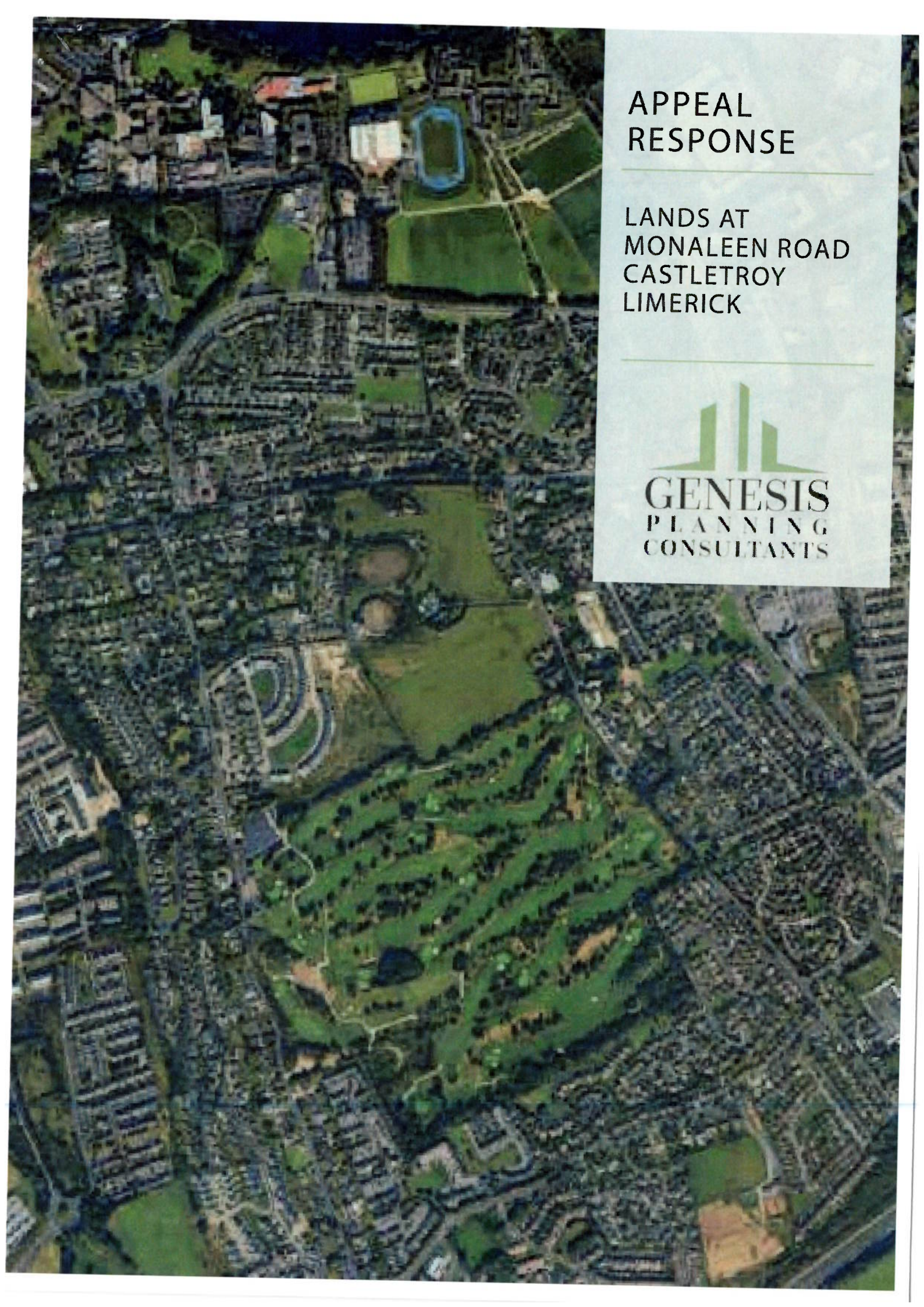
Yours sincerely,

A handwritten signature in black ink, appearing to read 'R. Woods'.

Ronan Woods

Office Director
Swift Building, Armagh Business Park,
Hamiltonsbawn Road, Armagh, BT60 1HW
Email: info@genesisplanning.co.uk

Tel: (+44) 28 30493 001
Tel: (+353) 45 571 682



APPEAL RESPONSE

LANDS AT
MONALEEN ROAD
CASTLETROY
LIMERICK



GENESIS
PLANNING
CONSULTANTS

APPEAL RESPONSE

LRD Residential Development for lands at
Monaleen Road, Castletroy

PREPARED BY:

Genesis Planning
Planning and Urban Design

ON BEHALF OF:

Columbia Estates Management Limited

Appeal reference 324286-26

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01 Introduction & background

-
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 - 1.3 Pre-planning Discussions
 - 1.4 Planning statistics
 - 1.5 Planning history
 - 1.6 Site location & description
 - 1.7 Evolution of Design
 - 1.8 LRD Proposals under appeal
 - 1.9 Duration of permission

01 Background

1.1 Overview

1.1.1 Limerick City County Council issued a notification of its decision to grant permission for the proposal on 28th April 2026, subject to 27no. conditions (LCC Reg. Ref: 2660241 refers). An Coimisiún will be aware that the applicant has not appealed any of the conditions in this case.

1.1.2 In overall terms having regard the respective third party appeals we note they comprise a number of statements that are entirely unsupported by any evidence, or reference to material on file or to the decision of the Planning Authority in this case.

1.1.3 In this context we request that An Coimisiún upholds the decision of the Planning Authority to grant permission for the development, in order to allow this important development to proceed which will provide for delivery of housing units and crèche to meet local demand.

1.1.4 For conciseness detailed background information relating to the proposed development and relevant to this appeal response, including site and development descriptions and planning policy context, is provided in the application particulars submitted to LCC at application stage.

1.1.5 Also relevant to the project background as a LRD project we highlight the development proposal has been designed to address matters raised by the Planning Authority during the course of the LRD pre-application discussions. For conciseness and to assist An Coimisiún this report should be read in conjunction with the application particulars as follows:

Application particulars

- Application Form & Statutory Notices;
- Part V Proposals;
- Statement on Housing Mix by Genesis Planning;
- Building Lifecycle Report by Arnold Leahy Architects & Genesis Planning;
- Schools, Childcare & Social Infrastructure Assessment by Genesis Planning;
- Architectural Drawings prepared by Arnold Leahy Architects;
- Housing Quality Assessment by Arnold Leahy Architects;
- Outline Construction Management Plan by Garland Consulting Engineers;
- Resource Waste Management Plan by Genesis Planning;
- Design Statement prepared by Genesis Planning;
- Statement of Response by Genesis Planning;
- Noise Assessment by AWW;
- Engineering Services reports & drawings prepared by Garland Consulting Engineers;
- Letter of feasibility from Irish Water;
- DMURS Design Audit by Genesis Planning & Arnold Leahy Architects;
- Traffic & Transport Assessment and RSA prepared by Road Plan;
- Appropriate Assessment Screening and Natura Impact Statement by JBA;
- EIAR by the project team;
- Landscaping Proposals prepared by CSR;
- Daylight Analysis by Digital Dimensions;
- Street Lighting proposals by Molloy Consulting Engineers;
- Project CGI's and Montages.

1.1.6 For conciseness we highlight the Planning Authority are satisfied on all development management criteria set out in both the Limerick City and County Development Plan (CDP) and the wider strategic policy and planning context, including the relevant Section 28 Guidelines. Key criteria on which all matters are deemed acceptable are summarised below:

- Zoning;
- Design rationale of the scheme;
- Plot Ratio & Site Coverage;
- Building design & site layout;
- Building Heights;
- Masterplan proposals;
- Parking and Access proposals;
- Landscaping proposals;
- Ecology;
- Archaeology;
- Waste Management;
- Site services;
- Urban Design and site works;
- SUDS Strategy & Wastewater;
- EIA Directive;
- Noise;
- Water Framework Directive;
- Climate Action Plan;
- Habitats Directive.

1.1.7 For ease of reference by An Coimisiún we enclose an electronic copy of all application documents to accompany this appeal response which are available on the LRD website:

www.monaleenroadlrd.com

1.1.8 We trust that An Coimisiún will have full regard to the extensive suite of material lodged with the planning application for this project.

1.1.9 We highlight also that the project design has been informed by Section 247 pre-planning discussions and Formal LRD discussions all of which are addressed in the proposal. While it is acknowledged that there are significant volumes of material in the planning application it is not considered helpful to re-iterate much of same under this appeal response as we note An Coimisiún will be considering this appeal in its entirety de novo.

1.1.10 Furthermore we take this opportunity to state the strategic importance of the site has been fully appreciated by the design team at all stages of the planning process and the proposal represents the optimum design proposal for the site.

1.2 Decision of the Planning Authority

1.2.1 We highlight the notification to grant permission by the Planning Authority is subject to 35 conditions. Of note no amendments are sought by these conditions, except for condition no.4 which restricts the duration of the permission to 5 years.

1.2.2 Accordingly all design proposals and particulars supporting the application are to the satisfaction of the Planning Authority.

1.3 Pre-planning Discussions

1.3.1 Section 247 pre-planning discussions were held with the Planning Authority on 29th May 2025 and 9th October 2025 pursuant to the requirements of the 2021 Act.

1.3.2 In response the project team took on-board comments from the Planning Authority and reviewed the layout and design options to find the optimum design response as now proposed.

1.3.3 Specifically the design proposals attached are considered to be an appropriate balance between density requirements and ensuring appropriate design specifics being proposed which are now considered to provide for a high-quality residential environment.

1.3.4 The design now under consideration by An Coimisiún incorporates in summary:

- Net site density proposals of 53.9 units per hectare;
- Overall residential unit numbers of 523no. proposed;
- A variety of residential types to include apartments and duplex units;
- A variety of building typologies, heights and finishes to ensure a high quality residential environment is provided;
- A DMURS compliant road layout;
- A scheme that responds to it's locational context;
- Prioritisation of pedestrian and cyclist movement within the scheme, promoting active travel and reducing car dependency.
- Adequate setbacks from the R445 to allow for an effective acoustic buffer.
- A scheme which responds to it's locational context in terms of density and scale, making the best and most efficient use of the land and the opportunities which it presents.

1.3.5 To assist An Coimisiún in terms of project background the table opposite summarises the matters raised by the Planning Authority during pre-planning consultations.

Item	Summary
Principle of Development	Acceptable (residential and crèche).
Density	53.9p/ha; Acceptable. Site is to be regarded as an intermediate urban location as per the Compact Settlement Guidelines and this sets the context for density and parking.
Public Open Space	Public Open Space in excess of 15% is proposed. All public open space is required to be useable, therefore details to confirm the usability of proposed public open space should be submitted with any application. The applicant should also consider Policy and Objective 5.1 of the Sustainable Dev & Compact Growth Guidelines in the provision of public open space. Ensure open space is incorporated into each phase. Also ensure open space is provided in walking distance to each residential unit. Open space calculations to be detailed in the application particulars.
Private Open Space	Private open space provision as per SPPR 2 in Sustainable Dev & Compact Growth Guidelines is required.
Communal Space	To be provided as per Apartment Guideline requirements.
Layout	Design and layout to be in accordance with the Compact Settlement Guidelines and Apartment Guidelines and Urban Design Manual.
SUDS	Design to be in accordance with SUDS requirements.
Lighting	Full lighting design proposals required, to include consideration of bats.
Traffic	TTA, RSA and MMP required. Junction analysis demonstrates a signalised junction is not required.
Transportation	DMURS principals to be incorporated. Set-back from Monaleen Road of 3metres to allow for active Travel. Mobility Management Plan to be included.
Parking provision	Given the location and high frequency bus route a reduction in car parking provision should be considered. 10% EV parking space provision. Provision of disabled spaces, car club spaces.
Bicycle provision	Apartments: 480, Visitors:161, Crèche: 10 Total 651 (dwellings in-curtilage). Mixture of storage types required, along with covered provision for crèche, cargo bikes and secure.
Flood Risk	Not in an area of flooding.
Ecology	AA Screening and NIS for application. ECIA to be incorporated into the EIAF.

Table 1 Summary of Section 247 and Formal LRD discussions

01 Background

1.4 Planning statistics

1.4.1 A summary overview of the key planning statistics for the proposed development is set out below in tabular format. Also a detailed Housing Quality Assessment is provided under separate cover.

Net Site Area	9.7 ha
Density (units per ha)	53.9p/ha
Height	2-5 storey buildings
Public Open Space	15.9% (15,448sq.m)
Communal Space	4486sq.m vs 1863sq.m required
Parking provision	648 spaces (CDP has a maximum provision of 706 spaces)
Bicycle provision	Apartments: 468, Visitors: 155, Crèche: 10 Total: 633 (dwellings in-curtilage)
One bed units	159 (30.4%)
Two bed units	151 (28.9%)
Three bed units	213 (40.7%)
Apartment Unit Dual Aspect	240no. (74%)
Apartment Units achieving 10% uplift in sizes	All Apartment units achieve 10% uplift in line with Apartment Guidelines

Table 2 Summary of site statistics

1.5 Planning history

1.5.1 We have reviewed the Planning Register and note the relevant planning history on the site. Most recently permission was granted under 117018 for alterations to the parent permission 042264 which provided for a total of 195no. houses, 61no. apartments and 41no. duplex units.

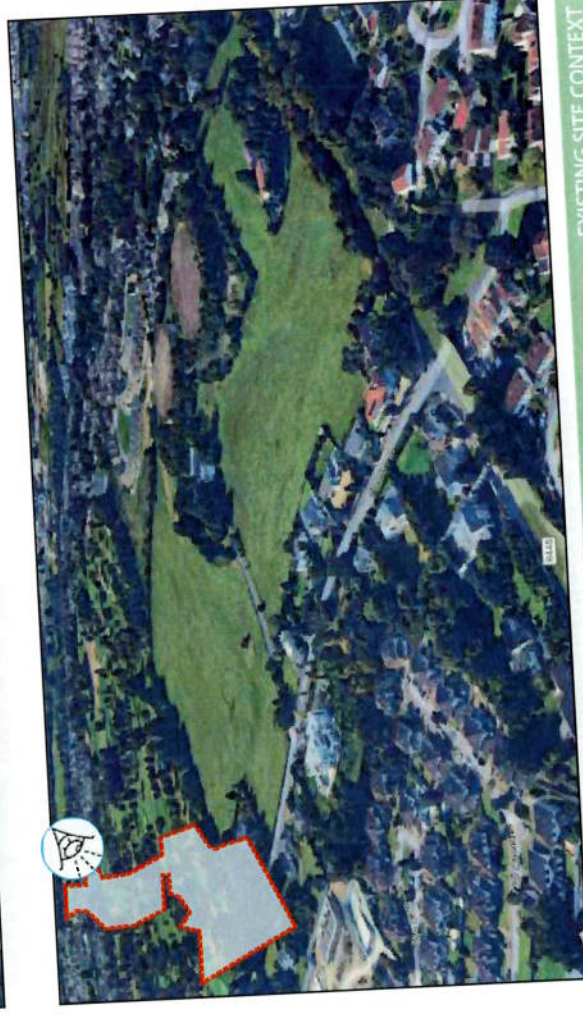
Reference Number	01871
Applicant Name	Breda Sutton
Development	Construction of 274 residential units & crèche
Decision	Conditional 14/01/2002
Reference Number	042264
Applicant Name	Michael Sutton
Development Description (summary)	construction of 195 no. houses, 61 no. apartments, 41 duplex units and crèche together with landscaping, drainage works and associated ancillary items and site works
Decision	Conditional 07/09/2005
Reference Number	071798
Applicant Name	Bellis Properties Ltd
Development Description (summary)	alterations to planning permission ref. no. 04/2264. The alterations shall include: the conversion of 10 no. detached units, 38 no. semi-detached units, 79 no. terraced units, 27 no. duplex apartments over 27 no. apartments, and 6 no. apartments (total 187 no. units) to 27 no. detached houses, 36 no. semi-detached, 58 no. terraced houses and 60 no. apartments and 5 no. serviced sites (total 186 no. units); alterations to the road layout; alterations to the boundary wall fronting Monaleen Road; alterations to the entrance layout and elevation; alterations to landscaping; the construction of an entrance chalet; and all associated site works at Monaleen Road, Castletroy, Co. Limerick
Decision	Conditional 05/02/2008
Reference Number	09597
Applicant Name	Bellis Properties Ltd.
Development Description (summary)	alterations to planning ref. no. 04/2264. The alterations include: the redesign and relocation of the proposed crèche; the redesign and relocation of 3 no. terraced townhouses previously numbered 64C, 65C & 66C; the replacement of 1 no. detached dwelling, 81 no. terraced townhouses and 15 no. apartments with 16 no. serviced sites with a detached dwelling house on proposed site no. 9 of this application; alterations to the roads layout; alterations to landscaping and all associated site works. Planning permission is further sought for alterations to planning permission ref. no. 07/1798. These alterations include: the replacement of 1 no. serviced site previously numbered 5 and 4 no. semi-detached houses previously numbered 119-122 with 4 no. detached houses
Decision	Conditional 13/11/2009
Reference Number	117018
Applicant Name	Gearoid Costelloe
Development Description (summary)	alterations to planning permission ref. no. 04/2264. The alterations shall include: the conversion of 10 no. detached units, 38 no. semi-detached units, 79 no. terraced units, 27 no. duplex apartments over 27 no. apartments, and 6 no. apartments (total 187 no. units) to 27 no. detached houses, 36 no. semi-detached, 58 no. terraced houses and 60 no. apartments and 5 no. serviced sites (total 186 no. units); alterations to the road layout; alterations to the boundary wall fronting Monaleen Road; alterations to the entrance layout and elevation; alterations to landscaping; the construction of an entrance chalet; and all associated site works
Decision	Conditional 10/05/2011

Table 3 Summary of planning history

01 Background

1.6 Site location & description

- 1.6.1 The subject site is located on Monaleen Road in the Castletroy area of Limerick. It is strategically positioned with the R445 regional road forming its northern boundary and the Castletroy Golf Club situated directly to the south.
- 1.6.2 In terms of the site itself it comprises a greenfield parcel of lands measuring 9.7 hectares.
- 1.6.3 In terms of access a new vehicular entrance to the site will be established from Monaleen Road, providing convenient connectivity. In addition, a dedicated pedestrian access point is proposed from the R445 on the northern boundary to support active travel.
- 1.6.4 Foul sewer and mains water infrastructure services are also existing along the local road with existing capacity to service the site.
- 1.6.5 The site itself is characterised by open and flat farm land with hedgerows along the perimeter.
- 1.6.6 The surrounding area is characterised by a suburban development pattern, with typical densities and built form reflective of residential neighbourhoods in the wider Castletroy area, as outlined below.



EXISTING SITE CONTEXT

01 Background

1.7 Evolution of Design



Consented under previous permission 117018

1.7.1 The layout above was a previous iteration of the development from the 2011 permission, now expired. This layout was reviewed by the design team and key matters to be addressed identified as:

- 297 units as per the previous scheme would not achieve compliance with current CDP in terms of minimum density requirements. (density of 30.6 units/ha)
- Not DMURS compliant in that it was a road dominated layout and way-finding did not encourage permeability.
- No crèche provision.
- Serviced sites not an efficient use of zoned lands.
- Larger unit typology inappropriate to the 2025 policy context
- Over-provision of cul-de-sacs.
- Inadequate open space provision.

1.7 Evolution of Design



Formal LRD proposals- October 2025

- 1.7.2 A number of revisions were made to the proposal by the design team. The amended proposal which formed the basis for Formal LRD discussions included for:
- 504 Residential Units.
 - A revised unit mix for Apartments in light of the 2025 Apartment Guidelines.
 - Proposed Part V units informed by preliminary discussions with the Housing Section of LCC.
 - An increase in density from 50.8 p/ha to to 51.3 units p/ha.
 - Provision of central parks, pocket parks, and a linear green route enhance amenity, biodiversity, and neighbourhood connectivity.
 - A crèche at site entrance onto Monaleen Road.
 - Diverse mix of houses, duplexes, and apartments with varied building heights (2-5 storeys) reinforces character and place.
 - Vehicular access via Monaleen Road, with pedestrian access onto the Dublin Road.
 - Generous public open space provision in excess of 15%, and communal space requirements also met.
 - A DMURS compliant design.
 - Active frontages ensure well-overlooked, safe, and lively streets and open spaces.
 - Site design now better reflects local context and scale.
 - SuDS integrated to manage surface water sustainably.
 - Pedestrian and cycle-friendly layout encourages active travel and reduces car reliance.
 - Site layout responds to local topography, surrounding context, and protected ecological features.
 - Permeable layout with pedestrian/cycle links encourages active travel and supports future public transport connectivity.
 - Links to adjacent lands provided for.

01 Background

1.8 LRD Proposals under Appeal

1.8.1 The planning rationale is to create a high quality residential development which enhances the environment and provides for a residential scheme appropriate to it's context.

1.8.2 Taking into account LRD pre-planning discussions the overarching concept for the design is therefore to achieve:

- Net residential density of 53.9p/ha meets policy for sustainable suburban growth.
- Interlinked open spaces and pocket parks, tree lined avenues and provision of same across the site to encourage usability for all residents.
- Crèche at the entrance serves as a community hub and key landmark.
- A mix of 2-5-storey buildings to create a strong sense of place; landmark buildings and create a new be-spoke residential scheme appropriate to the site.
- Responding to site contours.
- Positioning the taller buildings at the lower environs of the site.
- Responding to wayleaves that traverse the site for Irish Water infrastructure.
- Clear, DMURS-compliant road hierarchy with traffic-calming supports safe, intuitive movement.
- Active frontages overlook streets and parks, ensuring lively, secure public realms.
- Setbacks along the R445 provide effective acoustic buffering
- Achieving in excess of 15 % public open space, plus communal areas for apartments.
- A design that responds to local topography and context.
- SUDS infrastructure.
- Pedestrian and cycle priority ensured through direct routes, permeability links and secure bike storage.
- Permeability to adjacent lands to the west.
- Cognisance given to adjacent dwellings; and restricting building heights to 2 storeys where the site backs onto residential curtilages.

1.8.3 Further particulars on the design rationale are set out in the accompanying Design Statement.



MASTERPLAN GENERAL NOTES: 523 units

- Planning Site Area = 9.84 ha.
- Ownership Area = 9.70 ha.
- Net Residential Area = 9.70 ha.

Proposed 523 no. Units
Density = 53.9 units / ha.

214no. Houses 204no. 3 bed Houses
10no. 2 bed Houses

309no. Apartments 159no. 1 bed apartments
141no. 2 bed apartments
9no. 3 bed apartments

01 Background

1.9 Duration of Permission

1.9.1 As An Coimisiún will note a 10 year permission was applied for (refer to project description). Section 41 of the Planning and Development Act 2000 (as amended) states:

"41.—Without prejudice to the powers conferred on them by this Part to grant a permission to develop land for a limited period only, in deciding to grant a permission under section 34, 37, 37G or 37N, a planning authority or the Board, as may be appropriate, may, having regard to the nature and extent of the relevant development and any other material consideration, specify the period, being a period of more than 5 years, during which the permission is to have effect, and in the case the planning authority or the Board exercises, or refuses to exercise, the power conferred on it by this section, the exercise or refusal shall be regarded as forming part of the relevant decision of the authority or the Board under section 34, 37, 37G or 37N."

1.9.2 Accordingly under the provisions of Section 41 permission with a duration of 10 years is sought in this case.

1.9.3 We highlight the 10 year permission period allows for fluctuations in development output (i.e. construction of units) on a yearly basis to respond to potential changes in the construction market and the phased delivery of the necessary supporting infrastructure.

1.9.4 In terms of construction programme post planning consent being granted the phasing plan opposite and the accompanying construction programme set out the timeframe required to deliver each phase. As can be noted the project is proposed for delivery in 5 phases, which is reasonable for a development of this scale. Also prior to commencement a time period will be required for legal with potential occupants, construction drawings, tender and contractor appointment along with planning compliance matters, amongst general obligations to be given the scale of the project a standard 5 year permission is a restrictive period and not realistic to deliver an overall quantum of 523 residential units, a crèche and all associated site works. We also note condition 4 of the Planning Authority's decision has restricted the duration of permission to 5 years.

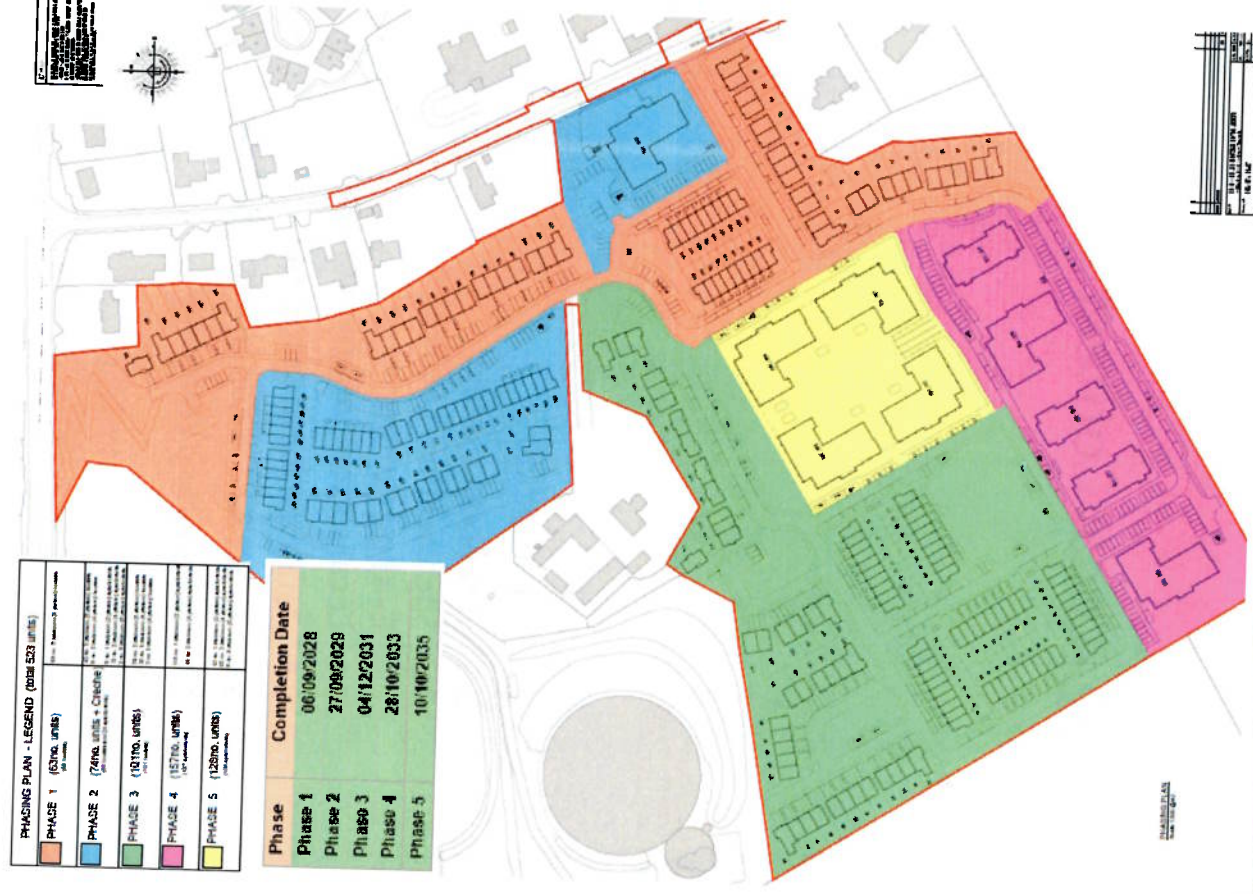
1.9.6 For the purposes of this appeal now under consideration to demonstrate why a 10 year permission is justified we refer to the accompanying Construction Programme; enclosed under separate cover.

1.9.7 Also we highlight for An Coimisiún a further reason for seeking a 10 year duration of permission is due to legislation under Section 42 of the Planning & Development Act 2000 (as amended) wherein further restrictions have been put in place regarding the extension of duration of any permission which requires an Environmental Impact Assessment or Appropriate Assessment.

1.9.8 On review of the legislation as per the 'European Union (Planning) (Habitats, Birds and Environmental Impact) Regulations 2021 (S.I. No. 456 of 2021), reg. 2(a)(ii) it is to be noted that for this scale of development which involves both an Environmental Impact Assessment and an Appropriate Assessment there is no basis for an extension of duration of permission to be granted.

1.9.9 Therefore in terms of the duration of the permission (and the requirements for EIA and NIS for the project) this raises a very significant risk to a project of this scale and hence it is both prudent and appropriate to seek a duration of permission during which the applicant can be comfortable the development can be completed.

1.9.10 For the reasons set out above we submit a 10 year permission period is considered appropriate to cover factors which may arise and which would be beyond the control of the applicant (and the Planning Authority) such as an unforeseen global conflict or a repeat of the Covid pandemic, either of which would be macroeconomic factors that should be allowed for in any construction programme and the duration of planning permissions.





02 | Local Context

2.1	Site location
2.2	Locational context
2.3	Site Location: Local & Existing Context
2.4	Local socio-economic context
2.5	Rationale for the proposal
2.6	Social & community infrastructure
2.7	Schools and childcare

02 Local Context

2.1 Site location

2.1.1 The site is located in the Castletroy area of Limerick City. It is bounded by Monaleen Road to the east, Dublin Road (R445) to the north and Castletroy Golf Club to the south.

2.1.2 The site comprises a greenfield parcel of agricultural lands measuring 9.7 hectares in total.

2.1.3 Access to the site will be provided via a new entrance from Monaleen Road. This location was selected due to level differences and mature tree cover and also the planned Bus Corridor along Dublin Road, which are constraints to vehicular access. Foul sewer, mains water, and ESB infrastructure are available along Monaleen Road, with capacity to service the development.

2.1.4 The site benefits from its position within an established residential area and is readily accessible.

2.1.5 Existing bus services run along R445 Road, and pedestrian connections to local facilities will be enhanced through integrated footpaths and safe crossing points.

2.1.6 The development connects to existing footpaths along Monaleen Road and provides an internal network of pedestrian routes, promoting walkability.

2.1.7 Adjoining uses include residential developments and agricultural lands.



02 Local Context

2.2 Locational context

2.2.1 Limerick City is the largest urban centre in Ireland's Mid-West and the country's third largest city. In terms of local demographic context, the population of Limerick City and Suburbs 94,192 which is the third largest in Ireland, and is an economic hub for the southern region. There are a large number of multi-national companies across a range of sectors and in conjunction with the economic growth of the town there has been a steady increase in the local population.

2.2.2 According to the NPF Limerick City and Metropolitan Area is:

'a well-located regional centre situated mid-way between Cork and Galway on Ireland's Atlantic Economic Corridor and with good connectivity to Dublin, Limerick has the potential to generate and be the focus of significant employment and housing growth.

2.2.3 In respect of the its aims the NPF also seeks to develop this area in a balanced manner between employment and residential wherein it states:

'It is necessary for Limerick to further strengthen its position as the principal focus within the Region and to continue to address the legacy of regional growth having occurred outside the City area.'

2.2.4 Further we note it is a National Policy Objective to:

'Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location' (p.93).

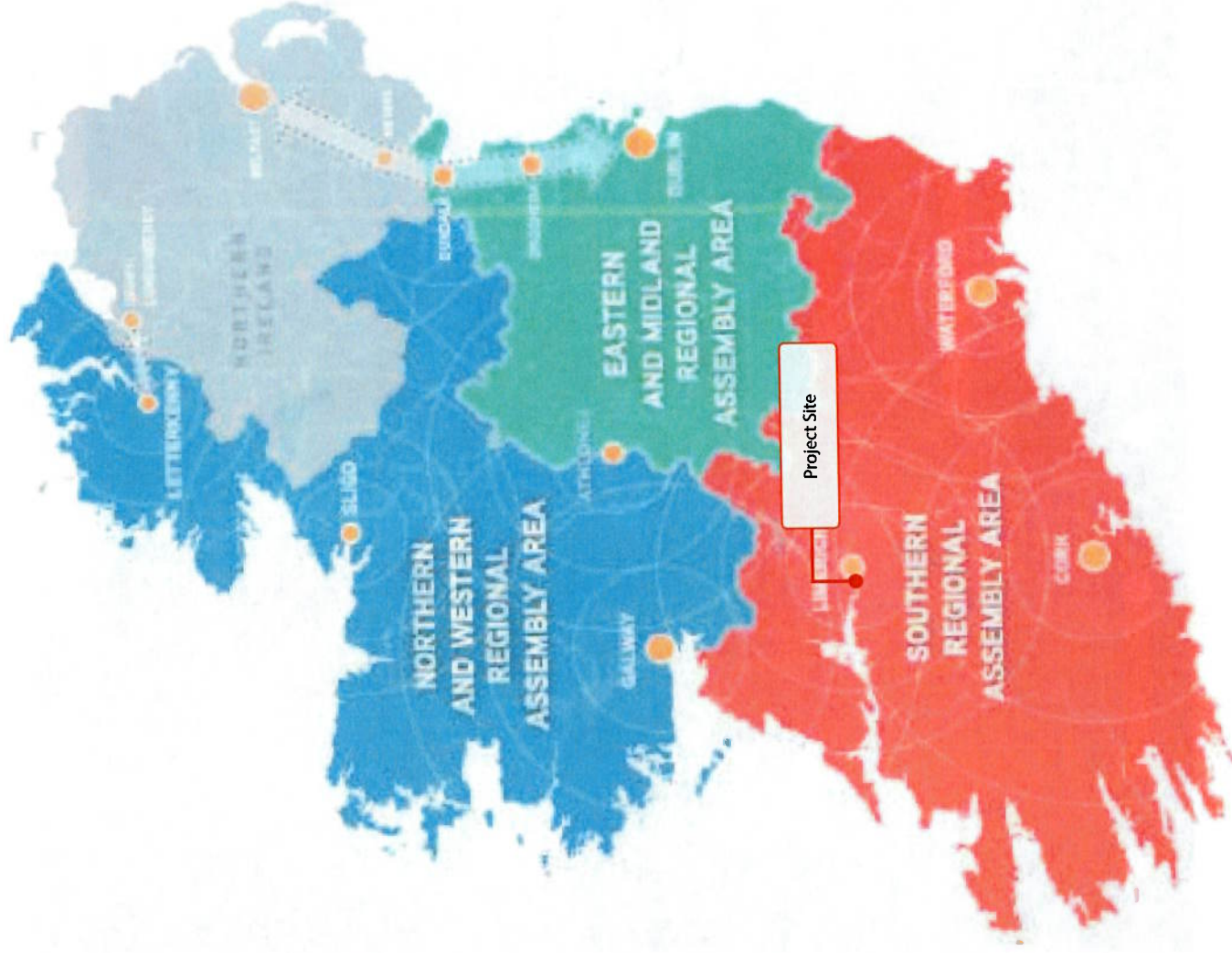
2.2.5 Also the NPF recognises such pressures wherein it states:

'There is a need to encourage population growth in towns of all sizes that are strong employment and service centres, where potential for sustainable growth exists, also supported by employment growth' (pg.60)

2.2.6 In this context the provision of appropriate residential accommodation in the right location is critical to maintaining Limericks competitiveness and attracting further growth in investment and jobs.

2.2.7 Given the proximate location of the site to areas zoned for employment purposes the proposed development will offer much needed housing for the area.

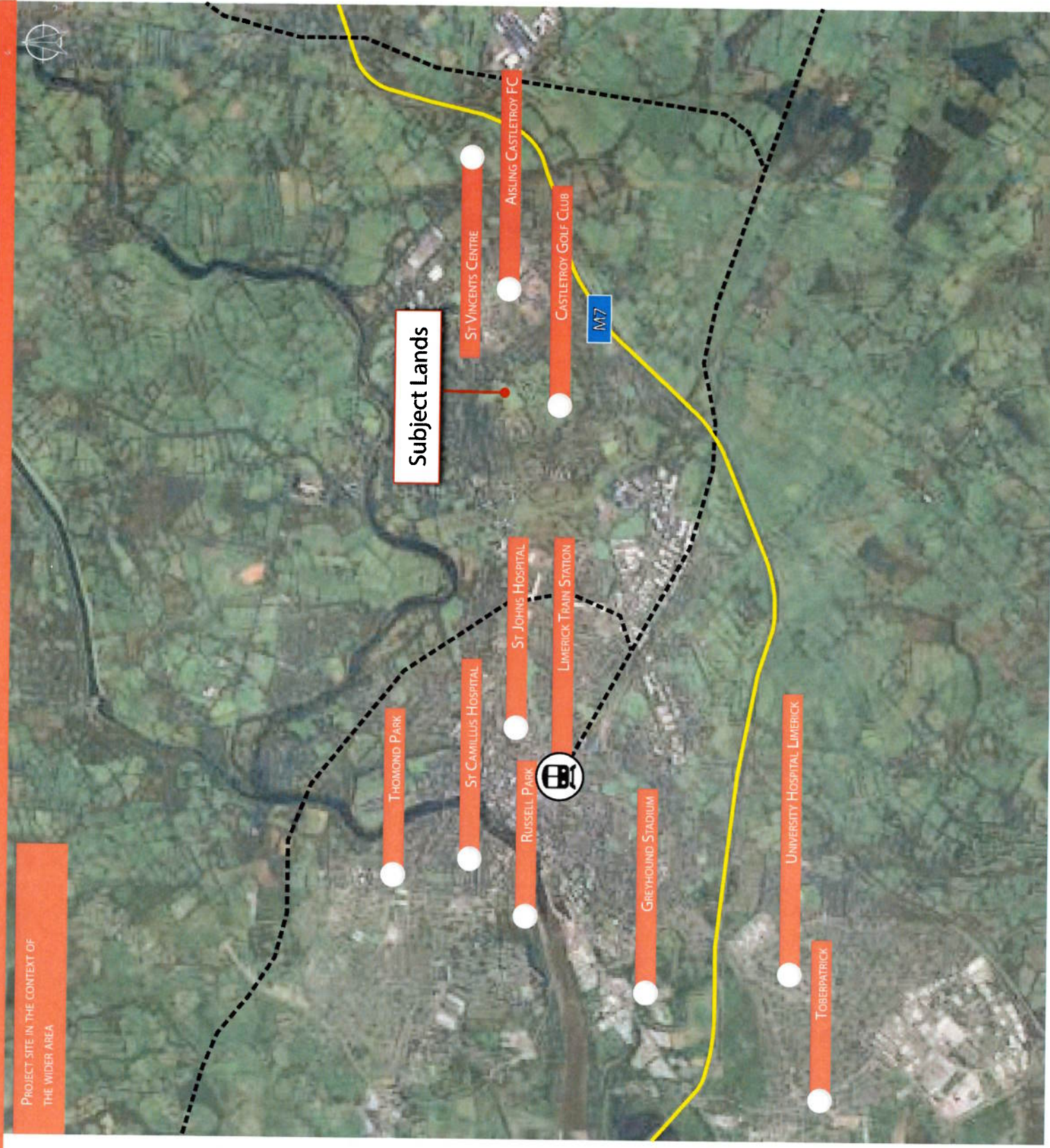
2.2.8 Accordingly we submit this clearly demonstrates that there is demand for additional residential units in the area which needs to be provided for in conjunction with increasing employment generation.



02 Local Context

2.3 Site Location: Local & Existing Context

- 2.3.1 The site is accessed via Monaleen Road and is highly accessible. It's location within an established urban area supports sustainable travel patterns.
- 2.3.2 Footpaths and on-street cycle routes in the surrounding area connect the site to Dublin Road and the wider Limerick environs.
- 2.3.3 The site is immediately bordered by Monaleen Road, Dublin Road and Castletroy Golf Club.
- 2.3.4 Surrounding land uses include residential developments, utility infrastructure and greenfield lands.



02 Local Context

2.4 Local socio-economic context

2.4.1 Limerick City is the largest urban centre in Ireland's Mid-West and the country's third largest city. In terms of local demographic context the population of Limerick City and Suburbs is 94,192 which is the third largest in Ireland. There are a large number of multi-national companies across a range of sectors and in conjunction with the economic growth of the City there has been a steady increase in the local population.

2.4.2 According to the NPF Limerick City and Metropolitan Area is:

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2.4.4 The NPF recognises such pressures wherein it states:

'There is a need to encourage population growth in towns of all sizes that are strong employment and service centres, where potential for sustainable growth exists, also supported by employment growth'. (pg.60)

2.4.5 In this context the provision of appropriate residential accommodation in the right location is critical to maintaining Limerick and Suburbs competitiveness and attracting further growth in investment and jobs.

2.4.6 Given the proximate location of the site to areas zoned for employment purposes and its commuter distance to Limerick City the proposed development will offer accommodation in Castletroy that is needed and currently not available.

2.4.7 In terms of population growth in recent years on review of CSO data it is found that Ballysimon ED population increased by 21.7% from 2016-2022, and County Limerick experienced a similar increase of 7.5% in this period.

2.4.8 This growth in population is resulting in a significant and unfulfilled housing demand for the City as a whole, and in particular the Ballysimon ED area given its strategic location adjacent to major employers at the eastern margins of Limerick.

2.4.9 In this context we submit this clearly demonstrates there is demand for additional residential units in the area which needs to be provided for in conjunction with increasing employment generation.

Population change

2.4.10 To provide an overview in terms of local population change and demand for housing this section provides a brief outline of the population growth of the State, the Greater Dublin Area (GDA), Co Limerick, Ballysimon ED according to the CSO census data.

2.4.11 As can be noted from table 3 below the population of County Limerick grew by 7.5% between 2016 and 2022. Also Ballysimon has grown substantially between 2016-2022, from 13590 in 2016 to 16540 in 2022, representing a population increase of 21.7%.

2.4.12 On this basis the population growth experienced both at County Level, and at a local level in Ballysimon ED (21.7%) are marginally below the trend in the growth in the state (8.1%) and the GDA (9.2%) during the same period.

Census Year	State	Greater Dublin Area	Co. Limerick	Ballysimon ED
2016	4,761,860	1,907,332	194899	13590
2022	5,149,139	2,082,605	209536	16540
% Change	8.1%	9.2%	7.5%	21.7%

Table 4 Population change of the State, the Greater Dublin Area, Limerick and Ballysimon ED between 2016 and 2022 as derived from the CSO statistics

02 Local Context

2.4 Local socio-economic context (contd.)

Housing market

2.4.13 As the Planning Authority will note the housing market in Limerick has shown significant growth in recent years, influenced by it's own population, economic growth and also by the overall demands being exerted for housing units.

2.4.14 On review we consider it is reasonable to assume this represents the natural growth of Limerick's population and the ongoing demand to live within the City environs.

2.4.15 Also as is evident in relevant publications and statistics there remains significant pressure on the housing market in the Metropolitan area.

2.4.16 However on review of CSO data for new dwelling completions it is noted that units constructed in recent years within County Limerick still remains low, particularly for apartment unit provision as shown below which captures housing delivery since the CDP was adopted.

Limerick	2022 Q2	2022 Q3	2022 Q4	2023 Q1	2023 Q2	2023 Q3	2023 Q4	2024 Q1	2024 Q2	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3
Single House	54	59	60	36	57	44	58	60	50	72	49	40	80	79
Scheme House	121	128	148	109	90	107	137	121	130	181	148	108	133	124
Apartment	37	5	3	60	2	46	48	17	46	112	42	30	12	32

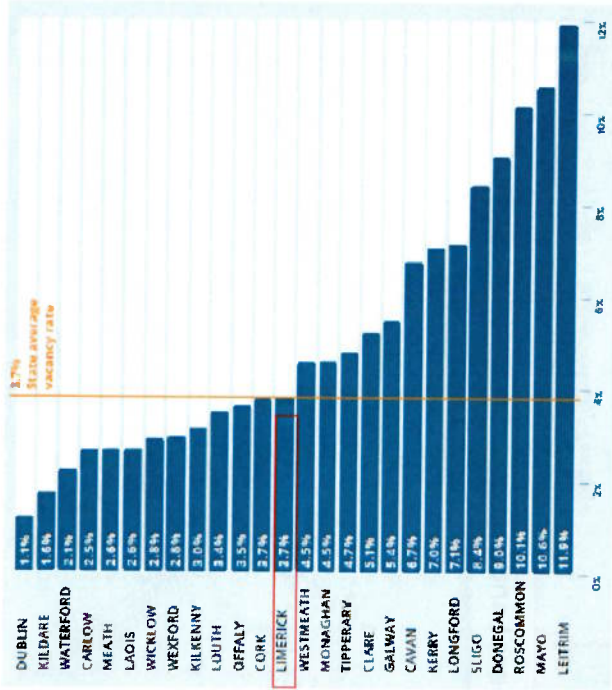
Table 5 New dwelling completions in Limerick, Type of Unit and Quarter (source: CSO)

2.4.17 Also with ongoing population growth trends evident from census figures this occupancy rate has increased in recent years.

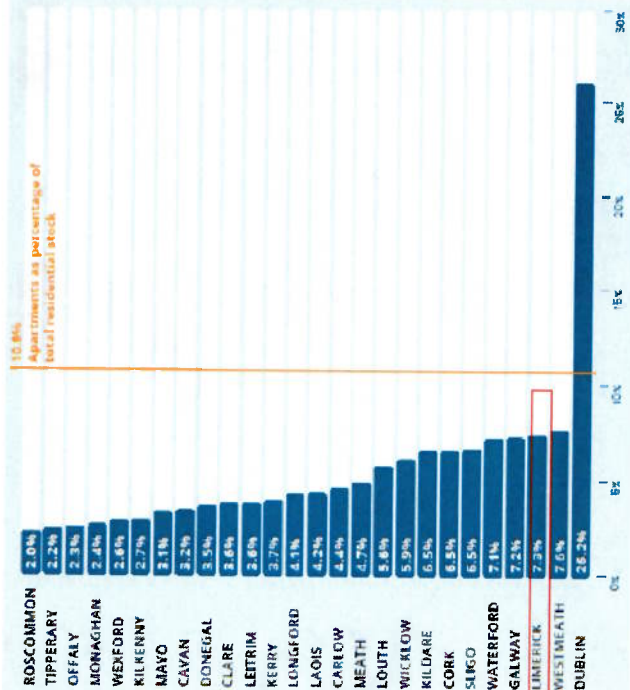
2.4.18 Further, at a county level it is noted from recent figures that the vacancy rate in Limerick is now recorded at an extremely low rate of 3.7% as per the latest Geodirectory Residential Issue report.

2.4.19 Further our analysis has found that In terms of existing apartment numbers it is noted that apartments form a low overall percentage of the housing mix within the county at only 7.3% of the total residential stock.

2.4.20 On the basis of the above it is clear there is a need for more residential units to be provided to accommodate the growing population within the Limerick Environs and in particular for apartment units.



Vacancy rates by County (Source Geodirectory Q4, 2025)

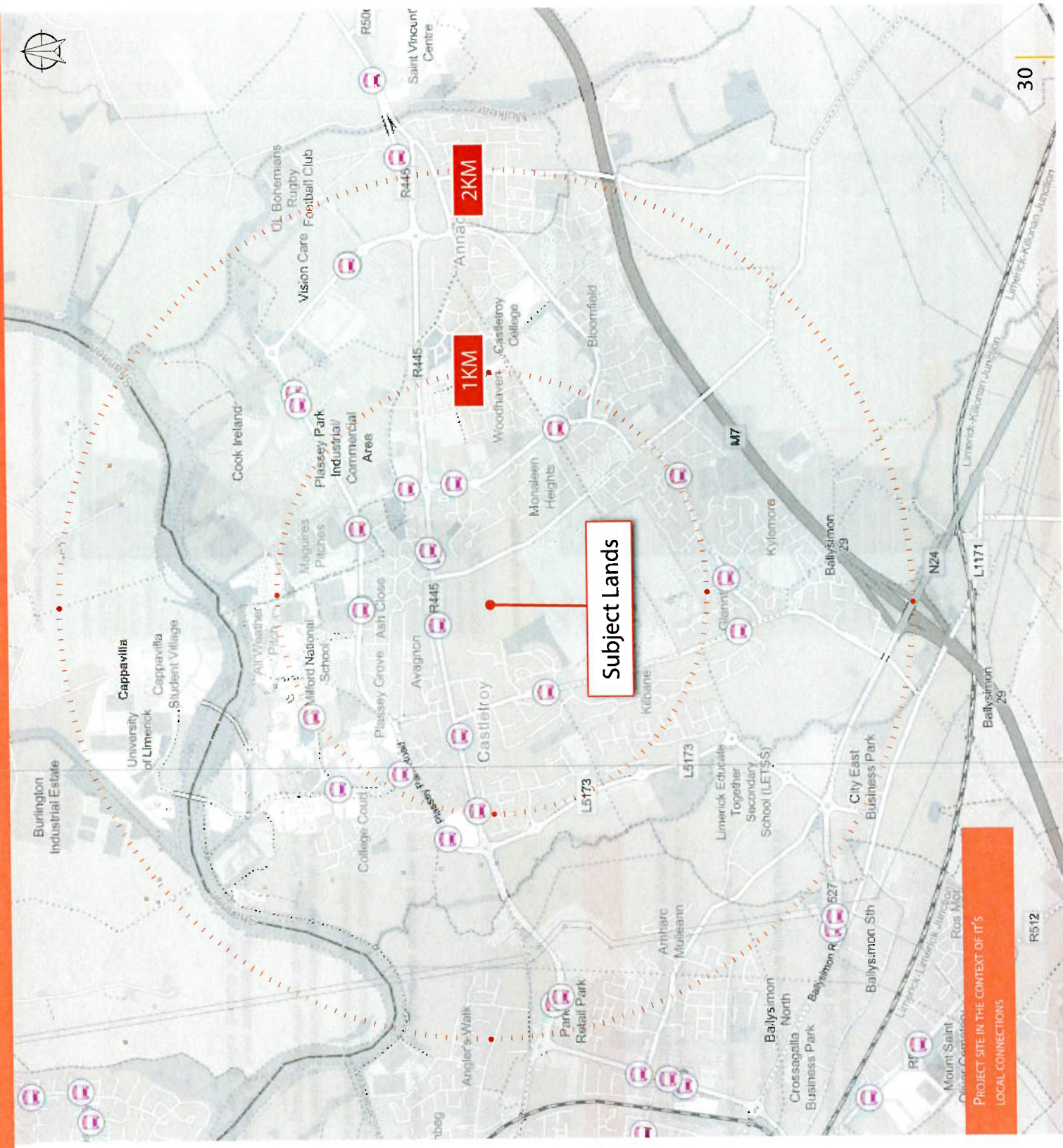


Apartment % by County (Source Geodirectory Q4, 2025)

02 Local Context

2.5 Rationale for the proposal: Connections

- 2.5.1 The site is served by Monaleen Road, which connects to the R445 (Dublin Road) and provides direct access to the wider Limerick Environs.
- 2.5.2 The location benefits from strong road connectivity, facilitating efficient access to and from the City centre.
- 2.5.3 Existing footpaths and cycle infrastructure in the area offer good access to local services and amenities. The site is also well served by public transport, with regular 308 bus services operating along Dublin Road to Limerick City Centre.
- 2.5.4 Overall the lands are strategically positioned within an established and accessible area, making them well suited to residential development in terms of local connectivity.



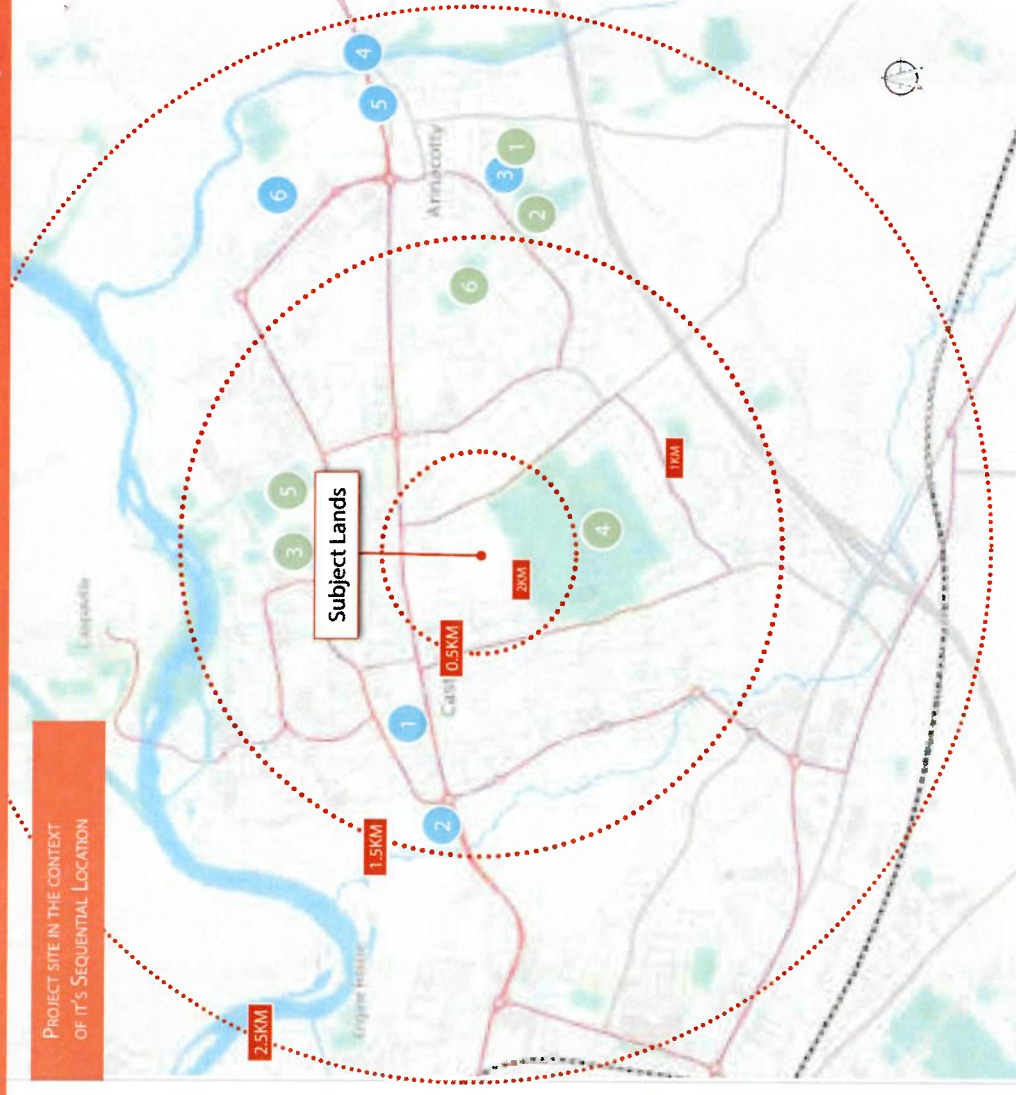
02 Local Context

2.6 Social & community infrastructure

- 2.6.1 Policy SC8 of the CDP sets out a requirement for proposals to demonstrate how residential developments are catered for in terms of social and community infrastructure.
- 2.6.2 Set out opposite is a map detailing how the site is well provided for in terms of social and community infrastructure within a 3km radius.
- 2.6.3 As can be noted the proposed development will be located in a well-provided for neighbourhood and within a short distance of a wide range of services for future residents.
- 2.6.4 In this context the development will provide a range of residential types which create a sustainable community and support the existing services in the area. Further analysis is set out in the accompanying Social Infrastructure Assessment.

2.7 Schools and childcare

- 2.7.1 In accordance with policy SCS014 of the CDP an audit of existing childcare and schools has also been undertaken by this practice, under separate cover, with a total of 18no. childcare facilities within a 3km radius and 28no. primary and post primary schools identified within a 5km radius of the site.
- 2.7.2 The assessment demonstrates in summary:
 - Childcare/crèche provision: The proposed childcare facility does not need to cater for any existing surplus demand outside of the site area itself at Monaleen Road and the crèche as proposed will be adequately sized to accommodate up to 60 children.
 - Primary and post primary school provision: There is adequate capacity in the Castletroy area going forward to cater for the proposed development in terms of both primary and post primary school provision.
- 2.7.3 As per accompanying plans the Crèche is designed to cater for 109 children, which is well above what the likely childcare demand our analysis finds is likely to be in the order of 60 childcare places from the proposed development.





03 | The proposed development

3.1	Layout & design rationale
3.2	Proposed accommodation
3.3	Open space & landscaping
3.4	Height
3.5	Materials
3.6	Access & parking
3.7	Site services
3.8	Flood risk
3.9	Taking in charge
3.10	Project construction management plan
3.11	Part V
3.12	Archaeology
3.13	Phasing

03 The Proposed Development

3.1 Layout & design rationale

3.1.1 The layout has been primarily informed by context, policies and objectives as defined in the Limerick City & County Development Plan 2022-2028 and relevant section 28 guidelines. The design rationale includes:

- Net residential density of 53.9 units/ha.
- 15.9% high-quality, usable public open spaces including pocket parks, and a linear green route with active frontages.
- Crèche located at site entrance, acting as a community hub and placemaking anchor.
- Mix of houses, duplexes, and apartments with varied heights (2-5 storeys) to create a strong identity and visual interest.
- Focal buildings positioned along key frontages to enhance legibility and streetscape character.
- Clear, DMURS-compliant road hierarchy promoting walkability, permeability, and safe navigation.
- Active frontages and well-overlooked spaces ensure safety and vibrant street life.
- Setbacks and layout revisions address acoustic impacts from R445.
- Internal roads incorporate RSA feedback, with traffic calming and enhanced pedestrian visibility.
- Safe, sociable street design includes upgraded EV and cycle infrastructure, supporting sustainable mobility.
- A design that responds to site constraints, including drainage, ecological sensitivity, and local context.

3.1.2 The orientation and layout of buildings within the proposed development is also designed to create a balance between scale, active streetscapes and also providing a sense of place.

3.2 Proposed accommodation

3.2.1 We refer to the attached statement of housing mix which demonstrates how the mix of units is appropriate to the area in terms of demographic profile.

Description	Number	Percentage %
1 Bed Units	159	30.4
2 Bed Unit	151	28.9
3 Bed Unit	213	40.7
Total	523	100%

Table 6 Unit mix summary

3.2.2 Building typologies are broken down into blocks ranging from 2-3 storey dwellings to 5 storey apartment units. All units have been designed to fully accord with the guidelines 'Sustainable Urban Housing: Design Standards for New Apartments' and also the Guidelines 'Quality Housing for Sustainable Communities' as appropriate.

3.2.3 Also the majority of apartment units have been designed to incorporate a minimum 10% uplift in minimum floor areas as specified under the Guidelines. We refer to the accompanying Housing Quality Assessment for reference.



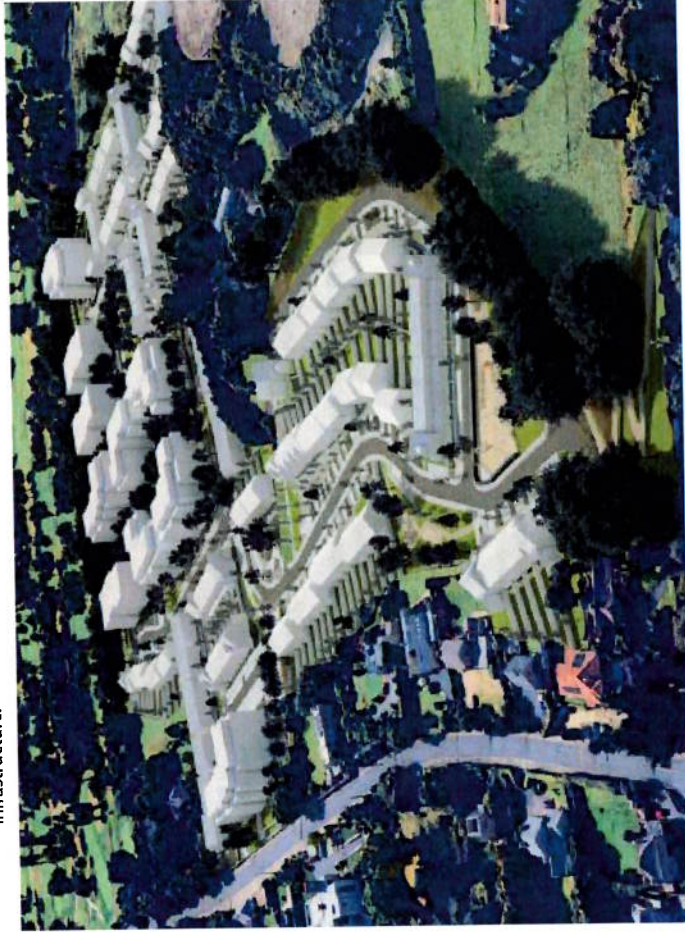
03 The Proposed Development

3.3 Open space & landscaping

3.3.1 Detailed consideration has been given to the provision of public open spaces and landscaping treatments within the development. The landscaping master plan for the site has incorporated a number of different landscaped areas, such as courtyards, play areas and walkways.

3.3.2 In terms of particulars we highlight:

- In excess of 15% high-quality public open space provided, including play areas, a central park, linear greenway and multiple pocket parks.
- A clear hierarchy of pedestrian and cycle links ensures strong site-wide connectivity and permeability.
- Dedicated communal open spaces provided for apartment and duplex residents.
- Landscaped buffers, planting belts, and privacy zones soften the built environment and reduce hard surfacing.
- A detailed landscape strategy, including planting plans and street furniture, enhances visual amenity and usability.
- All open spaces are overlooked by active frontages, promoting safe, sociable and well-surveilled environments.
- Open space provision meets density and play accessibility requirements, with pocket parks within 100m of all homes.
- Landscape design supports walkability, cycle access, and integration with future active travel infrastructure.



3.4 Height

3.4.1 The surrounding area is predominantly suburban in character, with typical building heights of up to five storeys. This context has informed a balanced height strategy across the development and the proposal is also appropriate in the context of the Limerick Height Strategy; discussed further in Section five of this statement.

3.4.2 Proposed building heights range from two to five storeys, with taller elements carefully located to respond to site topography, internal street hierarchy, and proximity to key frontages. Transitions in scale have been incorporated to ensure a respectful interface with adjacent residential areas and site boundaries.

3.4.3 The design approach minimises excessive regrading by responding to existing ground levels, reducing visual impact and allowing for seamless integration of green infrastructure.

3.5 Materials

3.5.1 A variety of materials are proposed within the development to provide visual interest and to create a distinct sense of place. The overall aesthetic concept is one of coherence and quality, balancing integration with the surrounding context and also providing for a unique and modern identity.

3.5.2 We refer to accompanying drawings prepared by Arnold Leahy Architects which detail proposed elevations and finishes.

3.6 Access & parking

3.6.1 The layout has been designed to connect to proposed pedestrian and cycle links to the R445 and the Monaleen Road which links to the wider Castletroy area and Limerick City Centre.

3.6.2 As with any intermediate location that is served by a bus route adjacent it is proposed to provide parking for residents and visitors in a manner that will encourage mobility shift.

3.6.3 Section five sets out the proposed parking and cycle storage proposals. In summary a total of 648no. car parking spaces are proposed, which is a reduction from the maximum standards of 732 spaces permitted under the CDP. It is submitted that due to the intermediate location and the nature of the development as a residential scheme then the proposed car parking provision is appropriate in this instance.

3.6.4 The proposed development will also provide for bicycle storage spaces in curtilage along with designated storage bays if required. It is submitted that the level of bicycle storage provided is sufficient to serve the proposed development. Local journeys will be encouraged to be undertaken via walking or cycling where practical with all units incorporating or having immediate access to storage space for bicycles.

3.6.5 There is a Bus Éireann bus stop located along the R445 which is to be upgraded to a quality bus corridor route. Appropriate pedestrian connections within the site and also to/from the bus stop via existing footpaths will ensure use is made of the public transport as available

03 The Proposed Development

3.7 Site services

3.7.1 The site is to be serviced via the existing Irish Water foul and water networks which pass along the site frontage. Further details regarding site services are provided in a separate report by Garland Consulting Engineers. Irish Water have also confirmed via a pre-connection inquiry that they have no objections to connections being made to serve the proposed development.

3.8 Flood risk

3.8.1 The site is located entirely within Flood Zone C as identified in the CFRAM study.

3.8.2 Accordingly with the site being outside an area identified at flood risk under the CFRAM study no further elaboration on flood risk is required and matters are settled in this regard.

3.9 Taking in charge

3.9.1 In accordance with taking in charge procedures in Limerick the development has been designed in such a manner as to allow for same. A condition pertaining to same is considered acceptable, providing for specific agreements with the Planning Authority prior to occupation of any units within the site.

3.10 Project construction management plan

3.10.1 Given the proximity of the site to the existing residential areas a project construction management plan accompanies the proposal. Matters to be addressed include management practices for works on-site in order to minimise the potential for any adverse effects on the recipient environment.

3.11 Part V

3.11.1 Section 96(3) of the Act sets out the 5 types of part V agreements that may be made.

- Transfer to the ownership of the local authority of a part or parts of the lands.
- Build and transfer to the ownership of the local authority, or persons nominated by the authority, of a number of housing units on the site.
- Transfer to the ownership of the local authority, or persons nominated by the authority, of housing units on any other land in the functional area of the local authority.
- Grant a lease of housing units to the local authority, either on the site subject to the planning application or on any other land within the functional area of the local authority.
- A combination of the transfer of the ownership of land under paragraph (a) of section 96(3) and one or more of the options of section 96(3).

3.11.2 In response the proposed development will provide for 20% of units (104 units under part V). It is proposed the 104no. units will be provided as 'build and transfer' as shown on the Part V proposals under separate cover. A letter for preliminary Part V agreement is enclosed and this can be addressed by planning condition going forward.

3.12 Archaeology

3.12.1 This is addressed in the accompanying Archaeological Assessment incorporated into the EIAR.

3.13 Phasing

3.13.1 The proposed development will be carried out in five phases. The phasing approach will ensure completion of car parking and open space/site works in totality prior to the occupancy of each phase of the development. Also with unit numbers in phase one being only 59 units there is no requirement to deliver the Crèche in phase one.

3.13.2 We refer to the accompanying phasing drawing by AL Architects which details the phasing schedule.





04 Policy Context

4.1	Overview
4.2	National Planning Framework 2040
4.3	Housing For All
4.4	Urban Design Manual
4.5	Urban Development & Building Heights
4.6	Sustainable Residential Development & Compact Settlement Guidelines
4.7	Design Standards for New Apartments
4.8	National Sustainable Mobility Policy (2022)
4.9	DMURS
4.10	Appropriate Assessment
4.11	Climate Action Plan
4.12	Flood Risk Management Guidelines
4.13	Childcare Guidelines
4.14	RSES
4.15	EPA: EIA Guidelines
4.16	Water framework Directive
4.17	Local Policy
4.18	Core Strategy
4.17	Residential Development Management

04 National & Regional Policy

4.1 Overview

4.1.1 The key planning policy, section 28 guidelines and regional planning policy relative to the proposal are as follows:

- National Planning Framework 2040
- Housing for All
- Urban Development and Building Heights
- Compact Settlement Guidelines
- National Sustainable Mobility Management Plan
- Sustainable Urban Housing: Design Standards for New Apartments: Guidelines for Planning Authorities 2025
- Guidelines for Planning Authorities on Childcare Facilities (2001)
- Design Manual for Urban Roads and Streets
- Habitats Directive – Appropriate Assessment
- Regional and Spatial Strategy for the Southern Region
- Flood Risk Management Guidelines
- EPA: EIA Guidelines
- Water Framework Directive
- Limerick City and County Development Plan 2022-2028

4.2 National Planning Framework 2040 (Revised)

4.2.1 The National Planning Framework 2040 sets out the importance of development within existing urban areas and sets out strategic objectives which Planning Authorities are to have regard to.

4.2.2 In response we submit that the proposal in a growth town is wholly consistent with the strategy and objectives as set out in the NPF to increase residential development at appropriate locations, within the settlement boundary of Limerick City.

4.3 Housing For All

4.3.1 Housing For All was launched in 2021 with the objective that everybody should have access to sustainable, good quality housing to purchase or rent at an affordable price, built to a high standard and located close to essential services, offering a high quality of life.

4.3.2 Housing for All is set around 4 no. pillars of proposed actions summarised as follows:

- Increasing New Housing Supply.
- Addressing vacancy and efficient use of existing stock.
- Supporting home ownership and increasing affordability.
- Eradicating Homelessness, Increasing Social Housing Delivery and Supporting Social Inclusion

4.3.3 In response we submit the proposed development is consistent with pillars 1-4 above in that it will improve the supply of residential units for Limerick in a sustainable manner.

4.4 Urban Design Manual

4.4.1 In response the proposal is consistent with the 12 criteria set out in the Urban Design Manual. We refer to the accompanying Planning Statement and also the Design Statement.

4.5 Urban Development and Building Heights (2018)

4.5.1 The guidelines put in place a presumption in favour of high buildings at locations with good public transport services, subject to design specifics.

4.5.2 In relation to redevelopment and enhancement of urban areas the guidelines state that:

‘to meet the needs of a growing population without growing out urban areas outwards requires more focus in planning policy and implementation terms of reusing previously developed ‘brownfield land’, building up urban infill sites (which may not have been built on before) and either reusing or redeveloping existing sites and buildings that may not be in the optimal usage or format taking into account contemporary and future requirements’.

4.5.3 The guidelines also place significant emphasis on promoting development within the existing urban footprint utilising the existing sustainable mobility corridors and networks. They state:

‘On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape’.

4.5.4 Of relevance is SPPR 4 which states:

‘SPPR 4: It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:

1. The minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled ‘Residential Development in Urban Areas (2007)’ or any amending or replacement Guidelines;
2. A greater mix of building heights and typologies in planning for the future development of suburban locations; and
3. Avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more’.

4.5.5 In response we submit the proposed building heights are an appropriate design response as envisaged under the guidelines for this suburban location.

4.5.6 In this policy context the design rationale incorporated into the design is for the development incorporating building heights up to 5no. storeys. On this basis we submit the design will be fully consistent with the approach envisaged under the guidelines for a suburban location.

4.5.7 For conciseness the accompanying Planning Statement sets out how consideration of Criteria under section 3.2 of the Building Height Guidelines are addressed.

04 National & Regional Policy

4.6 Sustainable Residential Development & Compact Settlement Guidelines

Overview

4.6.1 The Compact Settlement Guidelines have been recently adopted (January 2024) and set out policy and guidance in relation to the planning and development of urban and rural settlements, with a focus on residential development and the creation of sustainable and compact settlements.

4.6.2 We address the relevant matters and SPPRs from the Guidelines below.

Density

Under the Limerick Development Plan Castletroy falls within the Limerick City and Suburbs. In relation to density as per table 3.6 of the Guidelines it states that a density in the range of 35-50 dwellings per hectare (and up to 100dph) is acceptable.

	Centre	Urban	Suburban / Edge
Dublin / Cork	100-300 dph	50-250 dph	40-80 dph (+ 150 dph)
Limerick / Galway / Waterford	100-200 dph	50-150 dph	35-50 (+ up to 100 dph)
MASP Town	40-100 dph	40-100 dph	35-50
Regional Growth Centres / Key Towns / Large Towns	40-150 dph	n/a	30 - 50 dph (+ up to 80 dph).
Small to Medium Sized Town (>1500 - 10,000)	Respond to existing context.	n/a	25 - 40 dph
Rural Towns and Villages	Respond to existing context.	n/a	Respond to existing context.

Extract from Table 3.6 of the Guidelines

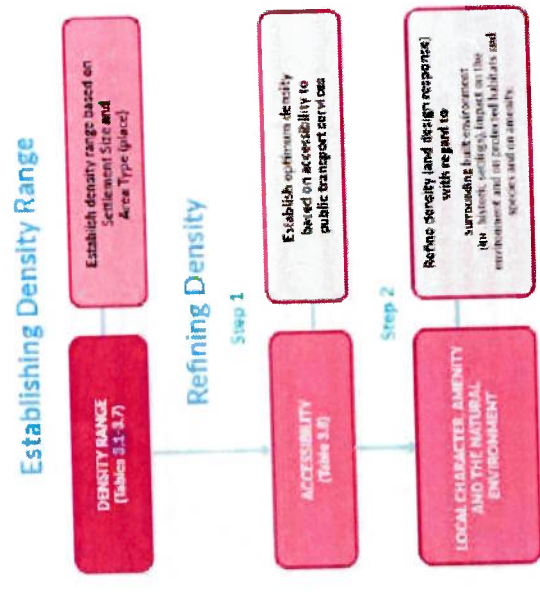
4.6.3 Regarding density policy and objective 3.1 states:

'It is the policy and objective of these Guidelines that the recommended residential density ranges set out in Section 3.2 are applied within statutory development plans and in the consideration of individual planning applications, and that these density ranges are refined further at a local level using the criteria set out in Section 3.3 where appropriate.'

4.6.4 In this context the net density proposed is 53.9 units per hectare and consistent with the Guidelines given it's accessible location and also the provisions of the Building Height Guidelines. Also relevant we highlight it is important to design the scheme so it does not appear out-of-context with a density that is excessive for this location.

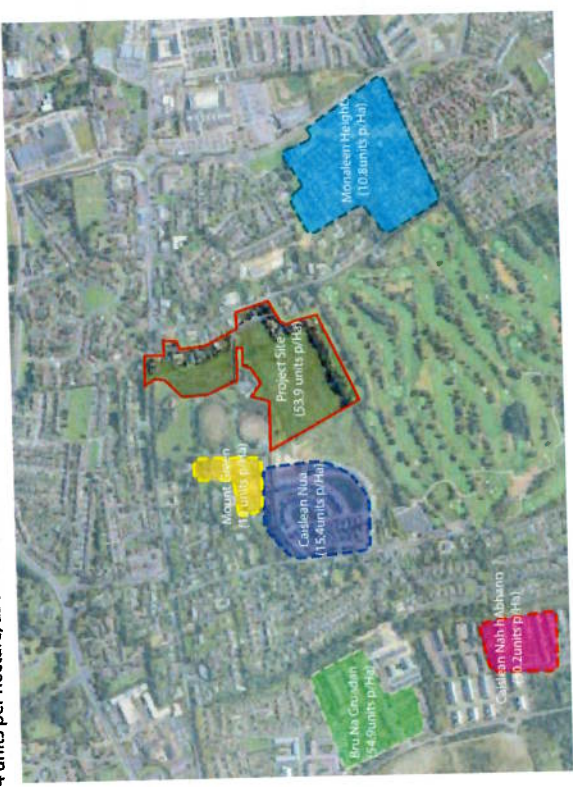
4.6.5 Furthermore regarding density Figure 3.3 of the Guidelines is highlighted.

Figure 3.3: Illustration of the process for establishing, optimising and refining appropriate density for a plan or development.



4.6.6

In response to Figure 3.3 of the Guidelines we have reviewed local character and density, with particular regard given the surrounding built environment which comprises density in the range of 10-54 units per hectare, as shown below and discussed further in the Design Statement enclosed.



04 National & Regional Policy

4.7 Sustainable Urban Housing: Design Standards for New Apartments; Guidelines for Planning Authorities (2025)

- 4.7.1 The Design Standards for New Apartments provide for updated guidance on apartment developments in response to the National Planning Framework and Rebuilding Ireland.
- 4.7.2 In response the proposal is fully compliant with the Apartment Guidelines in terms of unit mix, design particulars, communal space provision, bicycle storage and waste storage.
- 4.7.3 Also in terms of daylight requirements all apartments have been designed to meet relevant BRE Guideline Standards. We refer to the accompanying Daylight assessment by for more discussion and which also assesses the proposal in the context of communal, private and public open spaces.
- 4.7.4 Given the daylight analysis demonstrates apartment units and open spaces (public and private) will perform satisfactorily on daylight then compensatory measures as per Section 6.7 of the Apartment Guidelines are not required.

4.8 National Sustainable Mobility Policy (2022)

- 4.8.1 In response being a suburban site within walking distance of all local amenities the proposal is consistent with this policy framework by encouraging Mobility shift. Further discussion is set out in the accompanying Mobility Management Plan by Road Plan.

4.9 Design Manual for Urban Roads and Streets (DMURS)

- 4.9.1 In response the principal design guidance of DMURS has been incorporated into the proposal. We refer to the accompanying DMURS Design Statement by Garlands which accompanies the application.

4.10 Appropriate Assessment of Plans and Projects; Guidelines for Planning Authorities

- 4.10.1 In summary we refer to the Natura Impact statement by JBA which concludes that the proposed development individually or in combination with other plans or projects will not impact adversely on the integrity or qualifying features of any Natura 2000 site.
- 4.10.2 As the competent authority to carry out appropriate assessment, we submit that the findings in the NIS enable An Coimisiún to reach its own independent conclusion on the basis of objective information that the proposed development, individually or in combination with other plans or projects, will not have an adverse effect on any Natura 2000 sites and this conclusion can be reached beyond a reasonable scientific doubt.

4.11 Climate Action Plan

- 4.11.1 The Climate Action Plan (2023) sets out an ambitious plan to put Ireland on a more sustainable path, cutting emissions, creating a cleaner, greener economy and society and protecting us from the consequences of climate change.
- 4.11.2 In response the proposed development is compliant with the objectives of the National policy context on Climate Action and Low Carbon Development as the development will incorporate A2 rated buildings and incorporate technologies to minimise impacts on climate change.
- 4.11.3 All measures when combined will ensure a sustainable inner urban development is delivered and we refer to the EIAR for further discussion.

4.12 The Planning System and Flood Risk Management Guidelines

- 4.12.1 In summary the site is not affected by Fluvial, Tidal or Pluvial Flood risk as per the CFRAM study.
- 4.12.2 In summary the proposal fully complies with the Section 28 Guidelines in terms of flood risk and we highlight the Planning Authority are satisfied this is the case also.
- 4.12.3 Also the design of surface water infrastructure ensures no increase in run-off rates from the site. Accordingly with the site being outside an area identified at flood risk under the CFRAM study no further elaboration on flood risk is required and matters are settled in this regard.

4.13 Guidelines for Planning Authorities on Childcare Facilities

- 4.13.1 The development has been designed in accordance with the Guidelines. We refer to the accompanying statement on the Childcare Needs Assessment prepared by this practice.
- 4.13.2 In summary:
- Childcare/crèche provision: our analysis on existing crèche demand and spaces within the catchment area of 3km demonstrates that at present there are 761 max childcare spaces with 191 crèche spaces available for take up. On this basis the proposed childcare facility does not need to cater for any existing surplus demand outside of the site area itself.
 - Demand generated by the proposal for childcare: On analysis of the proposed scheme against the relevant childcare guidelines, the demographics of the area and the projected population have demonstrated that the proposal will be adequately sized by providing space to accommodate 109 children, against a demand for 60 children arising from the proposed development.
- 4.13.3 Furthermore being a full day care facility crèche provision is therefore consistent with both the 2001 Guidelines and Tusla standards set out in the 'Quality and Regulatory Framework' document for child care services.

4.14 Regional Spatial Economic Strategy for the Southern Region

4.14.1 The Regional Spatial and Economic Strategy 2020-2032 (RSES) provides the roadmap for effective regional development - it delivered a combination of response, design and innovation; in how we do business, deliver homes, build communities and value land-use - creating healthy places and promoting sustainable communities. The vision of the RSES is 'to play a leading role in the transformation of this region into a vibrant, connected, natural, inclusive and smart place to work and live.'

4.14.2 With regard to growth ambitions for the region the RSES notes the importance of compact growth in order to create more compact settlements:

'Compact Growth involves careful management of sustainable growth of compact cities, towns and villages to achieve better residential development across the Southern Region.'

4.14.3 At a strategic level the RSES aims to:

- Nurture all our places to realise their full potential;
- Protect and enhance our environment;
- Successfully combat climate change;
- Achieve economic prosperity and improved quality of life for all our citizens;
- Accommodate expanded growth and development in suitable locations; and
- Make the Southern Region one of Europe's most creative, innovative, greenest and liveable regions.

4.14.4 In response we submit the proposal is consistent with the RSES in that it will improve the supply of residential units for Castletry in a sustainable manner, and in particular it's emphasis on the consolidation of the urban area and the promotion of residential development close to existing services and employment centres.

4.15 Environmental Impact Assessment: EPA Guidelines

4.15.1 The proposed development includes proposals for 523no. residential units in total on the site. Therefore, on the basis that the threshold of 500no. dwelling units or more has been exceeded, the preparation of an EIAR is required on that basis.

4.15.2 In summary an EIAR is enclosed that fulfils the requirements set out by the EPA Guidelines on the information to be contained in Environmental Impact Assessment Reports (May 2022) and also legislative requirements under the Planning and Development Regulations.

4.15.3 The EIAR sets out in detail the current state of the environment in the vicinity of the proposed development site to quantify the possible effects of the proposed development on the environment.

4.16 Water Framework Directive

4.16.1 For conciseness we refer to chapter 10 in the EIAR which assesses Hydrology. The EIAR chapter sets out how the proposal is fully compliant with the Water Framework Directive.

4.17 Local Policy Context & Zoning

4.17.1 The Limerick CDP sets out the strategic land use objectives and policies for the overall development of the City and its Environs.

4.17.2 We note the subject lands are zoned 'New Residential'.

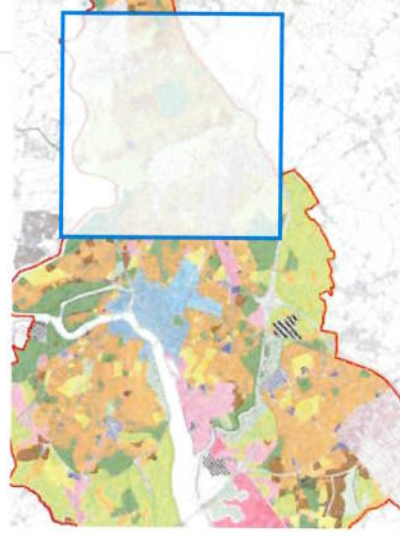
4.17.3 We highlight under 'New Residential' the objective states:

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

4.17.4 Furthermore the provision of a crèche on site is supported by the aim:

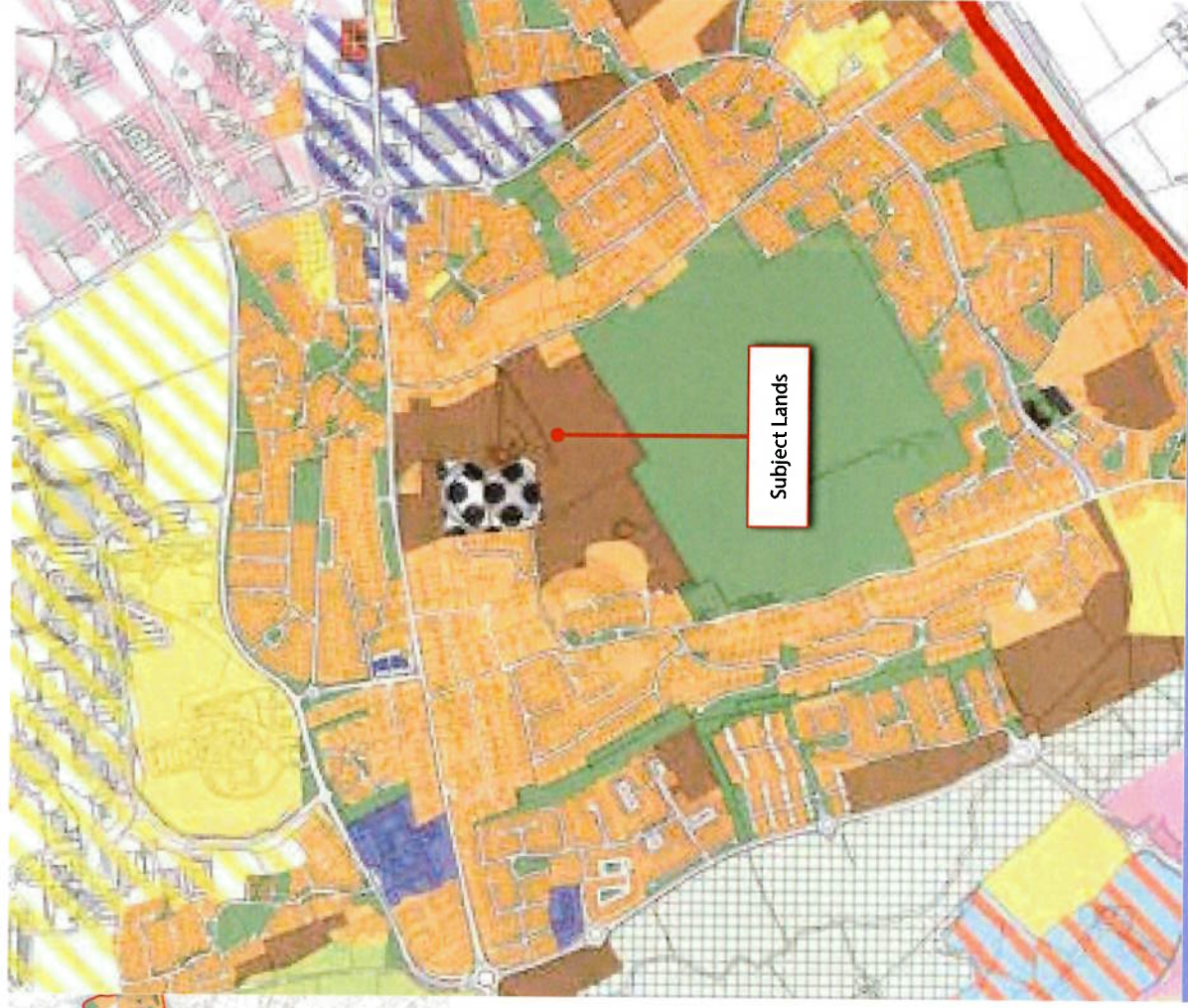
'This zone may include a range of other uses particularly those that have the potential to facilitate the development of new residential communities such as open space, schools, childcare facilities, doctor's surgeries and playing fields etc.'

4.17.5 In this context the development is planned as the zoning and land use objectives are being complied with.



LEGEND

	Agriculture		City Centre		Data Centre		District Centre		Education and Community		Facilities		Enterprise and Employment		Existing Residential		Groody Valley Green Wedge		High Tech/Manufacturing		Campus		Industrial		Local Centre		Mixed Use		New Residential		Open Space and Recreation		pNHA		Retail Warehousing
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Extract from the Limerick CDP and land use zoning Map 3

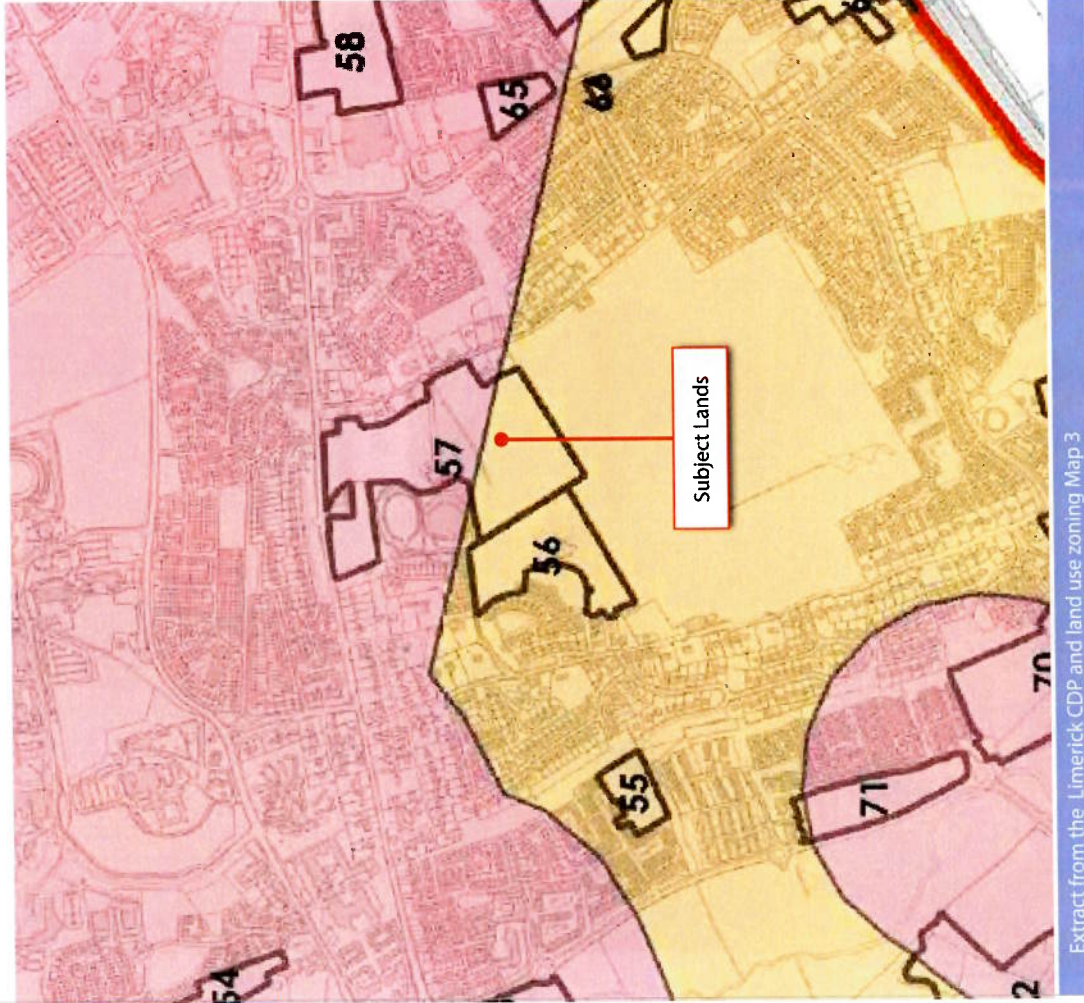
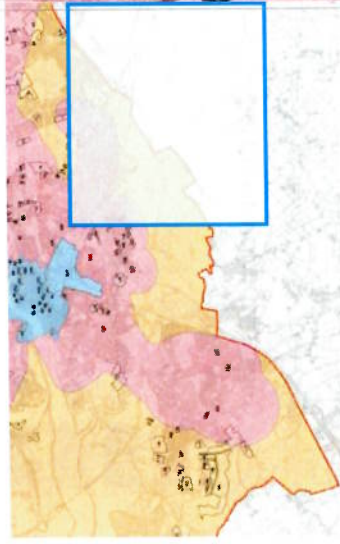
4.17 Local Policy Context & Zoning

4.17.6 The proposed site layout has been carefully designed to respond to its zoning context in the Limerick City and Suburbs Density Map, which straddles two designated density zones:

- 35+ units per hectare ;
- 45+ units per hectare.

4.17.7 By balancing unit distribution and building typologies across the site, the design achieves a net residential density of 53.9 units per hectare.

4.17.8 This density aligns with national and local planning policy objectives for compact growth, while making efficient use of serviced land and supporting the delivery of a sustainable, walkable neighbourhood.



05 Local Policy

4.18 Core Strategy

4.18.1 The LCCDP provides a settlement hierarchy which provides the direction for new development within the County for the period 2022-2028. Under the core strategy Castletroy located in Limerick City and Suburbs is identified within the Limerick Shannon Metropolitan Area.

4.18.2 We note under the consolidated variation of the core strategy at county level it sets out a housing allocation for Limerick City and Suburbs up to the period 2028 with a housing allocation of 11,054 over the plan period. For reference we include an extract from table 2.7 of the CDP.

Level	Settlements	Census 2016 population	Population growth as % of 2016 base	Additional house-holds forecasted 2022-28	Target residential density ranges (DUPH)	Zoned land required (hectares)	Existing brownfield zoned land available (hectares)	Infill or brownfield as % of total zoned land ¹	Shortfall (+) or excess (-) of zoned land (hectares)
Limerick Shannon Metropolitan Area (in Limerick)	Limerick City and Suburbs (in Limerick)	89,671	123,242	11,054	35 to 100+	259.25	353.06	84%	9381
Area (in Limerick)	Annacorney	2,930	3,641	235	45+	5.22	8.38	80%	316
	Mungret	277	687	153	35+	4.37	4.38	100%	0.01
	City and Suburbs (in Limerick)	92,878	127,570	11,442		268.84	365.82	84%	9,698ha.
	Mungret and Annacorney								(Capacity for 12,750 units on zoned lands)

4.18.3 As set out in the accompanying Statement of Housing Mix the total quantum of housing and apartments since adoption of the CDP in July 2022 (3 years) is averaging 606 units per annum across the County against what the Core Strategy seeks to deliver being 1907 per annum. This is significantly below the Core Strategy Target for the County and is circa 31% of the Core Strategy Target per annum.

4.18.4 In relation to Limerick City and suburbs our analysis also finds that 1292 units have been delivered since 2022 (431 per annum), against the Target being 1842 units per annum (11,054 between the period 2022-2028); 23% of Targets being met. We also highlight this Core Strategy has since been updated in 2026 with an uplift in Housing Targets to 2740 units per annum pursuant to the Section 28 Guidelines NPF Implementation Guidelines for Planning Authorities. (this was previously a target of 2599 units per annum under the 2022 CDP).

4.18.5 In response we submit the proposal is therefore consistent with the core strategy and housing allocation as set out in the Limerick City & County Development Plan 2022-2028, as varied. With regards to overall policy objectives of the CDP we refer to key policy objectives:

- Aligning with NPO4 of the NPF which targets 50% of future population and employment growth to be provided in the five cities and their suburbs;
- Policy CS P1 Core Strategy Implementation It is a policy of the Council to implement the Core Strategy for Limerick to ensure consistency with policies at a national and regional level, in particular population targets and distribution.
- Policy CS P2 Compact Growth It is a policy of the Council to support the compact growth of Limerick City Metropolitan Area, towns and villages by prioritising housing and employment development in locations within and contiguous to existing City and town footprints where it can be served by public transport and walking and cycling networks, to ensure that development proceeds sustainably and at an appropriate scale, density and sequence, in line with the Core Strategy

4.18.6 In this context the proposed development is consistent with these overarching policy objectives of the core strategy and development plan.

4.19 Residential development management standards

4.19.1 For conciseness we refer An Coimisiún to section 5.3 of the Planning Statement which accompanied the application.

4.19.2 In summary the proposal is wholly consistent with the relevant policy tests and we also highlighted the Planning Authority are satisfied in this regard with no design amendments.

05 | Response to Grounds of Appeal

5.1 | Overview

5.2 | Responds to Grounds of Appeal

05 Response to Grounds of appeal

5.1 Overview

- 5.1.1 The applicant has gone to great length to ensure that a comprehensive planning and environmental assessment of the proposal was provided to the Planning Authority, demonstrating how the proposed development is compliant with the relevant statutory planning policy and the proper planning and development of the area.
- 5.1.2 We also highlight from the planner's report they are satisfied that this is the case.
- 5.1.3 We would also highlight that the concerns raised in the appeal to An Coimisiún, have been either addressed in the planning application documents and/or the assessment of the Planning Authority.
- 5.1.4 Ultimately the Planning Authority was satisfied, when making its assessment and determination, that the planning application was consistent with National, Regional and Local planning policy have been satisfied.
- 5.1.5 Also we refer An Coimisiún to the respective submission made by the appellant to the Planning Authority during the course of the application which set out stated concerns to include apartment heights, privacy and red line boundary questions.
- 5.1.6 As per the planner's report of the above matters are to the satisfaction of the Planning Authority, with no amendments or mitigation measures incorporated into the decision.
- 5.1.7 Notwithstanding the above, in preparing this response we have sought to identify all of the grounds contained in the third party appeal and to elicit the key issue we provide our response to each matter below.

Zoning

- 5.1.8 In the first instance and of relevance to the planning context for this appeal we refer An Coimisiún to the Residential zoning which pertains to the lands. The proposal is plan-led and deemed appropriate for the residential development as proposed through the statutory development process.
- 5.1.9 Indeed by virtue of the RZLT now applicable there is now an obligation on the prospective applicant to develop the lands for residential use, as otherwise a RZLT penalty will arise.
- 5.1.10 In this context the proposal aligns with the proper planning of the area to deliver homes and a crèche on zoned lands as per the development plan objectives which deemed the lands appropriate for the proposal in the context of the wider environs and third party land uses.

Context

- 5.1.11 Having reviewed the planning register we highlight comparable grounds of appeal were recently considered by An Coimisiún under ACP decision reference 323968-25 on lands at Golf Links Road and Mount Green Road, Castletroy per map below.
- 5.1.12 This appeal is particularly relevant as it set out considered assessment on matters relating to proximity to the Golf Club, the same density concerns and the same infrastructure concerns which are now the subject of this appeal.
- 5.1.13 We submit that An Coimisiún's own reasoning and planning assessment are directly material to consideration of this appeal at Monaleen Road.



Site context and appeal site 323968-25

05 Response to Grounds of appeal

5.2 Response to Grounds of Appeal

5.2.1 We address each third party appeal separately below.

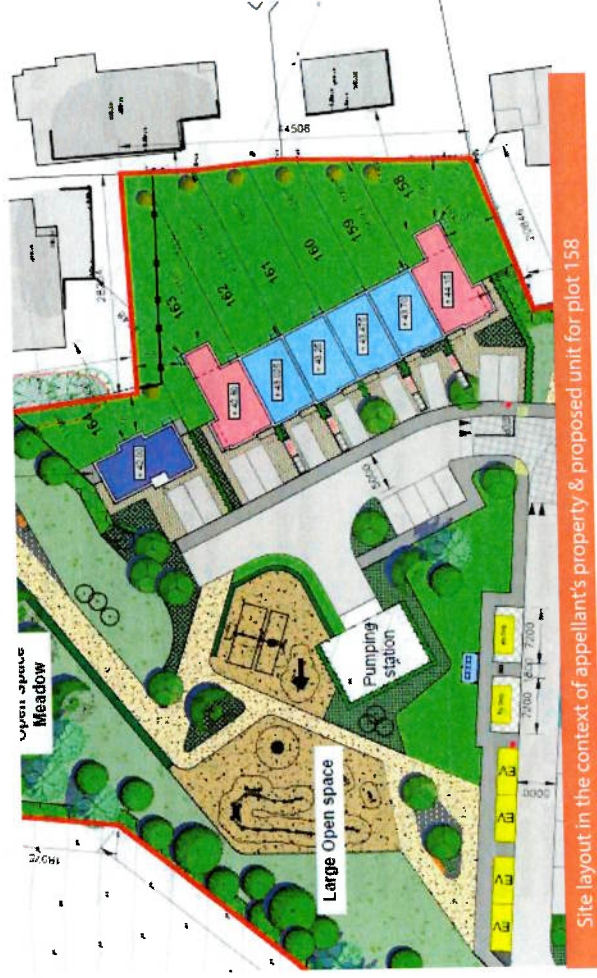
- Appeal 1: Pam Maloney

5.2.2 The appeal states:

‘Our grounds of appeal as outlined in our submission to LCC are as follows:

- Inadequate daylight and sunlight assessment.
- Failure to assess Annual Probable Sunlight House (APSH) and impacts on rear rooflights.
- Inaccurate representation of site levels and boundary relationships.
- Inappropriate boundary treatment in the context of a retained embankment.
- Lack of structural and drainage safeguards.
- Unacceptable loss of residential amenity, including overlooking and overshadowing.
- Failure to assess cumulative and long-term overshadowing impacts.
- Overdevelopment, contrary to the established character of the area.

5.2.3 Response: For reference the appellant's property is noted as per the map below.

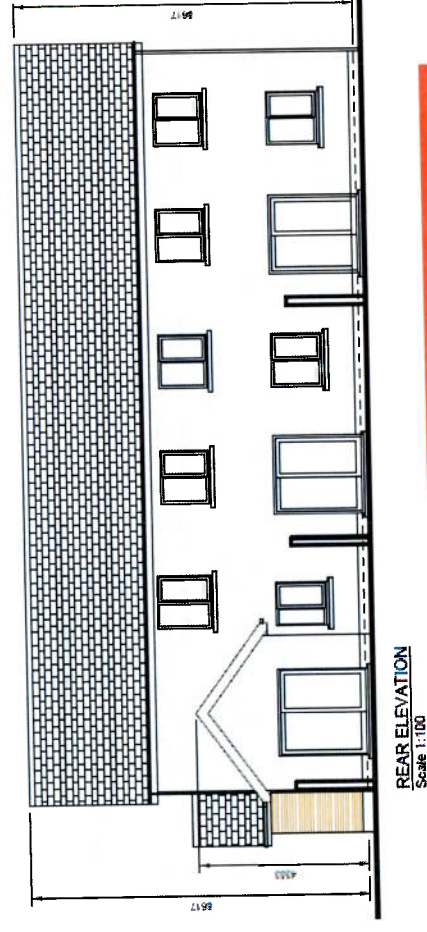
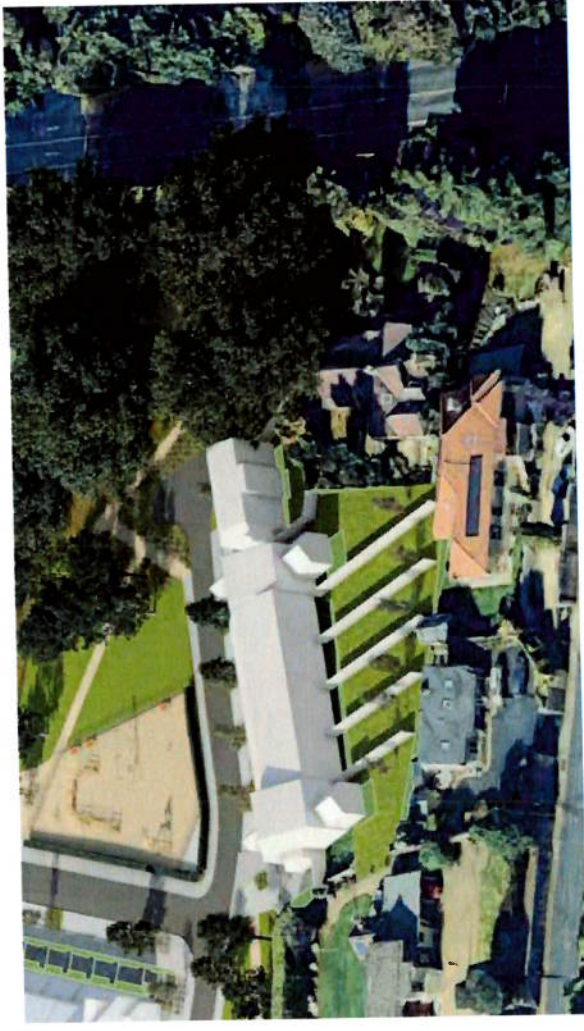


5.2.4 As shown on the site layout plan the closest proposed dwelling is 16.1 metres from the rear boundary of the appellant's dwelling, and at this closest point only a single storey rear projection is proposed for unit 158 which is a 2 storey dwelling.

5.2.5 This separation distance adheres to the provisions of the Compact Settlement Guidelines.

5.2.6 To demonstrate how this layout is appropriate relative to the appellant's property the project team have prepared a scaled model render of the proposed layout; shown below.

5.2.7 As shown the existing dwellings along Monaleen Road are provided with a design and layout that is appropriate with only 2 storey units proposed and adequate separate distances proposed from the party boundaries.



Site model in the context of appellant's property & proposed unit for plot 158

05 Response to Grounds of Appeal

• Appeal 2: A Hersey Planning

5.2.15 The appeal sets out a number of grounds and we address each matter below.

- Ground 1: Overdevelopment and inadequate provision of local services

5.2.16 Response: This is addressed in the Schools, Childcare and Social Infrastructure Assessment. As set out in application documents a 10 year permission is sought in this instance and given the delivery of the scheme over several years there will be no immediate demand on Social Infrastructure in the area.

5.2.17 For conciseness we refer An Coimisiún to our assessment on Infrastructure in the area which demonstrates the site is well located for services going forward. We would also highlight a Crèche is proposed to cater for the development with headroom incorporated into same.

5.2.18 Going forward we also highlight the Department of Education carry out annual reviews on future school place demand and we refer to their most recent forecast published in December 2025 (appended to this appeal submission) which demonstrates that even with population growth both primary and post primary school demand falls over the next 20 years.



National Projections of full-time enrolment

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- Ground 2: Density

5.2.19 Response: This is addressed in the Planning Statement which demonstrates how the density is appropriate for the site. Of relevance we refer An Coimisiún to LRD pre-planning discussions and how the design and density was supported by the Planning Authority, particularly in the context of the Quality Bus Corridor proposed alongside the northern site boundary and the clear policy context that supports the density to make efficient use of this strategic site.

5.2.20 We note the appeal references the estimated yield that was factored into the Limerick City and County Development Plan and which assumed a yield of 508 units from the site.

5.2.21 In response we say this was an estimated yield only, prepared in 2022 as part of the Draft CDP and this estimated yield does not set policy objectives or density provisions for the Development Management process.

5.2.22 In this context and also having regard to the recent Variation no.3 to the Limerick City and County Development Plan (April 2026) which seeks to increase Housing Delivery in line with the revised NPF and accompanying Section 28 Guidelines NPF Implementation: Guidelines for Planning Authorities' we submit the proposed density fully accords with the policy objectives, zoning and Core Strategy of the Limerick City and County Development Plan.

5.2.23 To assist An Coimisiún we highlight the provisions of Variation no.3 now require:

'A minimum net density in the range of 50 to 200 dwelling units per hectare are required at appropriate locations within: 800 metres of (i) the University Hospital; (ii) Raheen Business Park; (iii) National Technology Park; (iv) University Limerick; (v) Technological University of Shannon; (vi) Mary Immaculate College; (vii) Bons Secours Hospital (viii) 500m of high frequency (min. 10-minute peak hour frequency) existing or proposed urban bus services and; (ix) Compact medium density residential neighbourhoods around the city centre that have evolved over time.'

5.2.24 On this basis and given the urban design proposed wherein the design responds appropriately to the context we say the density is wholly appropriate.

- Ground 3: Scale and Building Height

5.2.25 Response: This is addressed in both the Planning Statement and the Design Statement. In summary a net residential density of 53.9p/ha is proposed, which aligns with the Limerick City & County Development Plan 2022-2028 and the Section 28 Guidelines for Sustainable Residential Development and Compact Growth.

5.2.26 This density is considered appropriate for an intermediate and accessible location and supports the efficient use of serviced, zoned lands.

5.2.27 The proposed density achieves a balanced response to national, regional and local policy objectives by delivering compact growth while respecting the site's suburban context and ensuring integration with surrounding residential areas.

5.2.28 In terms of height, the proposal includes a considered mix of 2 to 5-storey buildings, with increased heights concentrated in the core of the site within the apartment blocks. This approach reflects guidance in the CDP and also national policy, promoting higher density in appropriate locations while incorporating a lower height proximate to third party dwellings. Focal buildings are strategically positioned along key routes and frontages to enhance legibility, contribute to placemaking, and support a coherent urban structure.

- Ground 4: Traffic Generation, Road Safety and Transportation Impacts

5.2.29 Response: We refer to the Traffic and Transport Assessment, Mobility Management Plan, DMURS Audit and Road Safety Audit which accompany the application now under consideration.

5.2.30 In response we highlight all design standards are incorporated into the layout to ensure no traffic, pedestrian or cyclist safety arises and the local road network has capacity to cater for the proposal.

5.2.8 Also the Daylight, Sunlight and Shadow Assessment by Digital Dimensions demonstrates no unacceptable impact on existing or proposed dwellings in terms of Daylight, Sunlight or Shadow. This is detailed in section 3.2 of the study and the appellant's dwelling/property was duly assessed and is referenced as property C in the report.

3.2 Preliminary Assessment of Adjoining Dwellings

The BRE guidelines BR209:2022 recommend that loss of light to existing windows need not be assessed if the distance of each part of the new development from the existing window is three or more times its height above the centre of the existing window. This area referred to as the zone of influence is plotted in yellow in Figure 2 below. Over most of the site, the zone of influence does not extend to any existing residential structure or to structures in the development to the south west, which is currently in the planning process.

The north and east boundaries, where the zone of influence is close to residential properties, the area is examined in detail, as shown in Figure 3 below. Here the dwellings are subject to sectional analysis. Section planes perpendicular to the windows of habitable rooms, which face the proposed development are indicated in blue. The planes at locations A - E extend and if they intersect the proposed development, they are plotted in Figure 4 below.



5.2.9 In summary the Daylight, Sunlight and Shadow Assessment by Digital Dimensions demonstrates no unacceptable impact on existing or proposed dwellings in terms of Daylight, Sunlight or Shadow. Indeed of relevance we refer to both sections 1.6 and section 3.3.17 of the BRE Guidelines which states in relation to impact on adjacent properties gardens and open spaces:

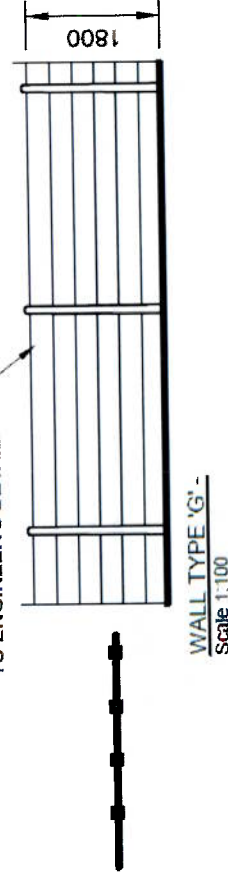
'1.6 The guide is intended for building designers and their clients, consultants, and planning officials. The advice given here is not mandatory and the guide should not be seen as an instrument of planning policy; its aim is to help rather than constrain the designer.'

'3.3.17 It is recommended that for it to appear adequately sunlit throughout the year, at least half of a garden or amenity area should receive at least two hours of sunlight on 21 March. If as a result of new development an existing garden or amenity area does not meet the above, and the area that can receive two hours of sun on 21 March is less than 0.80 times its former value, then the loss of sunlight is likely to be noticeable. If a detailed calculation cannot be carried out, it is recommended that the centre of the area should receive at least two hours of sunlight on 21 March.'

5.2.10 As shown in the accompanying assessment by Digital Dimensions the recommended standards for neighbouring lands and the appellant's property or dwelling are not impacted by the proposal, neither in terms of shadow, daylight or sunlight.

5.2.11 Also to address concerns raised by the appellant in terms of boundary treatments and general arrangement of the proposal relative to their property this is addressed in the the boundary proposals by Arnold Leahy Architects. As shown a new 1.8m height concrete post and plank fence is proposed along the boundary, with the existing hedge also retained. (refer to drawing sheet 107)

1.8m HIGH CONCRETE POST AND CONCRETE PLANK FENCE,
TO ENGINEER'S DETAIL.



5.2.12 In this context we submit appeal grounds by Pam Maloney are fully addressed in application documents. Going forward should An Coimisiún deem a 2 metre high wall is more appropriate along this boundary this can be addressed by planning condition.

5.2.13 We would also highlight for An Coimisiún the above matters were duly considered by the Planning Authority.

5.2.14 On these basis we submit no matters have been raised that have not been addressed either in the assessment of the Planning Authority or our responses above.

6.1 Summary & Conclusion

6.1.1 The attached proposal has been prepared following pre-application discussions with the Planning Authority on 29th May and 9th October 2025 respectively.

6.1.2 The design particulars have been reviewed and amended in order to address both the preliminary opinions of the Planning Authority to ensure compliance with relevant national policies, guidelines and local policies under the Limerick City and County Development Plan 2022-2028.

6.1.3 At a national and regional level this statement and accompanying documents has demonstrated the consistency of the development with the following:

- National Planning Framework 2040
- Housing for All
- Urban Development and Building Heights
- Sustainable Residential Development and Compact Settlement Guidelines and the
- Accompanying Urban Design Manual;
- Delivering Homes, Sustaining Communities (2008) and the accompanying Best Practice
- Guidelines - Quality Housing for Sustainable Communities;
- National Sustainable Mobility Policy (2022)
- Sustainable Urban Housing: Design Standards for New Apartments: Guidelines for
- Planning Authorities 2025;
- Design Manual for Urban Roads and Streets;
- Guidelines for Planning Authorities on Childcare Facilities (2001);
- Habitats Directive - Appropriate Assessment;
- Regional and Spatial Strategy for the Southern Region;
- The Planning System & Flood Risk Management: Guidelines for Planning Authorities;
- Environmental Impact Assessment: EPA Guidelines and the EIA Directive;
- Water Framework Directive;
- Limerick County Development Plan 2022-2028.

6.1.4 We summarise proposals:

- A net residential density of approximately 53.9 units per hectare, representing a balanced response to national and local policy while respecting the suburban context of the site.
- A total of 523 residential units delivered across a 9.7 hectare site, comprising a mix of residential unit types.
- A centrally located crèche designed to meet demand from the development and the wider area, in line with relevant childcare design guidelines.
- A mix of building forms and heights (2 to 5 storeys) providing variety in the streetscape, enhancing legibility, and responding appropriately to the site's topography and surrounding context.
- Public open space equating to 15.9% of the site area, including a central park, pocket parks, and play areas designed for all age groups.
- A DMURS-compliant network of roads, footpaths, and cycle routes, establishing a clear hierarchy of movement and strong permeability to surrounding lands.

- Provision of active frontages throughout to promote passive surveillance and vibrant public spaces.
- All associated infrastructure and service connections incorporated.
- A high-quality, integrated scheme that makes efficient use of zoned land and reflects the site's location, context, and accessibility.

6.1.5 Given the foregoing and extensive documentation prepared as part of the planning application, we submit there are no matters arising in the appellants statement of case which undermine the conclusions set out in the Planning Authority's report which deems the development acceptable in planning terms.

6.1.6 On our detailed review of the third party appeal submitted we submit that none of the matters raise material considerations so as to offend planning policy tests as set out in relevant national planning standards or the respective County Development Plan as applicable.

6.1.7 To conclude for the reasons set out in application documents a we submit a 10 year permission period is considered appropriate to cover factors which may arise and which would be beyond the control of the applicant (and the Planning Authority) such as an unforeseen global conflict or a repeat of the Covid pandemic, either of which would be macroeconomic factors that should be allowed for in any construction programme and the duration of planning permissions

6.1.8 In summary it is our contention that, once all relevant information is taken into consideration, then the Coimisiun is empowered to, and should, grant permission in the interests of the proper planning and sustainable development of the area.



Ronan Woods
Director

06 | Conclusion

6.1 | Summary



www.genesisplanning.co.uk
info@genesisplanning.co.uk

T: (+44) 2830 493 001
T: (+353) 45 571 862



An Roinn Oideachais
agus Óige
Department of Education
and Youth

National Projections of full-time enrolment

Primary & Post-Primary Level
2025/26 – 2044/45

December 2025

Prepared by the Department of Education and Youth
Statistics Unit

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1 Introduction

This report presents the latest set of projections of full-time enrolment in primary and post-primary schools aided¹ by the Department of Education and Youth. It updates the previous set of projections published in March 2024 and provides projections (not predictions) of pupils nationally to 2044/45, assuming recent trends in fertility and migration were to continue. The enrolment levels serve as a baseline used in other models, for example, in teacher demand and supply modelling.

The enrolment projection model is based on the Central Statistics Office's (CSO) national² projections which were updated in July 2024. While projections are presented for three migration scenarios, the Department believes that the M1F2 scenario is the most likely outcome. This assumes that high rates of migration will continue, and that fertility will gradually decrease from the current rate of 1.55 to 1.3 in 2037.

Changes in both primary and post-primary schools are directly related to changes in the population they serve. Residential development and inward migration can create pressure on enrolment in certain areas, even as enrolments in other areas are declining. Moreover, closures due to falling enrolment numbers can exert pressure for additional places in schools with larger enrolment numbers. Therefore, it is important to recognise that enrolment at local levels may not align with national trends. The enrolment figures contained in this report are to be taken strictly as projections only, they are not to be confused with official enrolment figures, which are published separately.³

2 Assumptions

Traditionally this report has presented results with two fertility and three migration scenarios, producing six sets of tables. This multiple scenario approach is more suited to projection models that are run less frequently (for example, every five years) to enable the user to select the scenario that is arising in between releases. The Department undertakes to revise its enrolment projections on a more regular basis (generally every one or two years). This increased frequency along with the fact rising fertility ("F1") is thought to be highly unlikely,

¹ Aided means state funded. For the primary sector this includes religious schools, non-denominational schools, multi-denominational schools and Gaelscoileanna (Irish-medium schools). A small number of private primary schools (35 in 2024) are not state funded, and they are excluded from this analysis. In the post-primary sector fee charging schools are included but not private 'grind' colleges.

² CSO National Projections, see - <https://www.cso.ie/en/releasesandpublications/ep/p-plfp/populationandlabourforceprojections2023-2057/>

³ Official enrolment figures are available here: <https://www.gov.ie/en/department-of-education/publications/education-statistics/> and via the CSO <https://data.cso.ie/table/EDA42> and <https://data.cso.ie/table/EDA69>

means that only a single fertility scenario, specifically, falling fertility ("F2"), is now presented. This will be kept under review when updating projections.

Future births are projected based on the CSO projections of females aged between 15 – 49. The number of births each year is calculated based on the current fertility rate for each age and the overall projected Total Fertility Rate. The number of births is smoothed to be in line with the academic year. Entrants into junior infants are calculated based on the number of 4-, 5-, and 6-year-olds each year. Migration assumptions and transfers between private schools, special schools, and home schooling are applied for each standard. Students carry over from one standard to the next each year, accounting for repeats and retention rates in post-primary schools.

2.1 Fertility

Annual births have fallen by over 20,000 in the last number of years, from their recent peak of 75,550 in 2009 to 54,418 in 2023. While the decrease in absolute number of births is not unusual, with a very similar drop seen between 1980 and 1995, the Total Fertility Rate (TFR) has fallen from 3.23 in 1980 to 2.06 in 2009, and continues to fall. Aligning with CSO projections, the TFR is set to start at 1.55 in 2023, decrease gradually to 1.3 in 2038, and is then held constant for the remainder of the projections⁴.

2.2 Migration

Migration has a large impact on enrolment figures. Historical migration is extracted from the primary online database (POD) and the post-primary online database (PPOD) and analysed. Inflows consist of students entering school from Northern Ireland and abroad, and transfers from home schooling, special schools, and private schools. Post-primary outflow is estimated based on the results of the annual retention report.

Enrolments of Ukrainian students have held relatively steady in the 2024/25 school year, with 17,495 students in October 2024 and 17,488 in May 2025. The M1 migration scenario assumes that there will be net zero migration of Ukrainian students. M2 and M3 include 10% and 40% of students returning to Ukraine respectively over the next three years. A scenario with high rates of return is currently thought unlikely – in a survey held in 2024, 53% of respondents stated they want to stay in Ireland permanently⁵.

⁴ CSO National Projections, see - <https://www.cso.ie/en/releasesandpublications/ep/p-plfp/populationandlabourforceprojections2023-2057/fertilityassumptions/>

⁵ Largest survey to date of Ukrainians in Ireland who found protection from war Subject – "Employment". [Ukrainian Action in Ireland](#)

More details on assumptions and how they are reflected in the model can be found in the appendix.

3 National Projections

3.1 Primary

Enrolments in primary schools in Ireland stood at 552,059⁶ in September 2024, a decrease of 4,047 pupils compared to the previous school year 2023/24. Since the peak in 2018/19 (567,772 pupils), enrolments had been decreasing in line with school age demographic trends until 2022/23, when numbers rose due to increased inward migration.

Under all scenarios, enrolments are projected to fall until 2040/41, before beginning to rise again. Enrolments under the M1F2 scenario will reach a low of 481,536, a decrease of over 70,500 from September 2024.

Table 1: Projected enrolments in primary schools, 2025/26 – 2044/45

	M1F2	M2F2	M3F2
2024/25	552,059	552,059	552,059
2025/26	549,026	548,739	546,308
2026/27	546,030	542,587	537,363
2027/28	540,307	536,924	529,251
2028/29	534,460	530,645	522,126
2029/30	527,512	523,366	514,188
2030/31	521,112	516,733	507,087
2031/32	514,455	509,945	500,012
2032/33	508,019	503,273	493,544
2033/34	501,097	495,339	486,254
2034/35	494,392	488,859	480,313
2035/36	489,101	482,460	474,261
2036/37	485,832	479,068	471,021
2037/38	483,699	476,857	468,926
2038/39	482,315	475,425	467,571
2039/40	481,603	474,687	466,870
2040/41	481,536	474,620	466,801
2041/42	481,898	474,981	467,164
2042/43	482,730	475,813	467,996
2043/44	484,254	477,337	469,520
2044/45	486,469	479,553	471,735

⁶ School 19599A has previously not been included in the bulletin or projection report. It is included in the 2024/25 bulletin and final enrolment figures, giving total primary enrolments of 552,116.

3.1.1 Annual rises and falls

Table 2 presents the projected annual changes in enrolment out to the 2044/45 school year. The sharpest decline will be seen over the next two to nine years, depending on the migration scenario. The average decrease per annum for the period covering the 2024/25 school year to the 2034/35 school year is projected:

- around 5,800 decrease in pupil enrolments per annum under M1F2
- around 6,300 decrease per annum under M2F2
- around 7,200 decrease per annum under M3F2

Therefore, the net decrease in primary level for this same period is projected to be between 57,700 and 71,800 pupils depending on how migration trends unfold.

Table 2: Projected absolute annual change in primary schools, 2025/26 – 2044/45

	M1F2	M2F2	M3F2
2024/25	-4,047	-4,047	-4,047
2025/26	-3,033	-3,320	-5,751
2026/27	-2,996	-6,152	-8,945
2027/28	-5,723	-5,663	-8,112
2028/29	-5,847	-6,279	-7,125
2029/30	-6,948	-7,279	-7,938
2030/31	-6,400	-6,633	-7,101
2031/32	-6,657	-6,788	-7,075
2032/33	-6,436	-6,672	-6,468
2033/34	-6,922	-7,934	-7,290
2034/35	-6,705	-6,480	-5,941
2035/36	-5,291	-6,399	-6,052
2036/37	-3,269	-3,392	-3,240
2037/38	-2,133	-2,211	-2,095
2038/39	-1,384	-1,432	-1,355
2039/40	-712	-738	-701
2040/41	-67	-67	-69
2041/42	362	361	363
2042/43	832	832	832
2043/44	1,524	1,524	1,524
2044/45	2,215	2,216	2,215

3.1.2 Projections by standard

Table 3 shows national projections by standard under the M1F2 scenario. Intake into Junior Infants is projected to decrease by over 5,800 to 54,887 over the next 11 years before starting to rise again in 2036/37.

Table 3: Projected enrolments (M1F2) in primary schools, by standard, 2025/26 – 2044/45

	Junior Infants	Senior Infants	First Class	Second Class	Third Class	Fourth Class	Fifth Class	Sixth Class
	60,715	62,632	64,666	66,192	66,461	68,771	69,806	69,819
2025/26	61,304	60,970	63,109	65,156	66,712	67,040	69,376	70,461
2026/27	61,211	61,513	61,656	63,773	65,859	67,453	67,811	70,161
2027/28	59,805	61,211	61,953	62,086	64,240	66,372	67,986	68,366
2028/29	57,879	59,816	61,652	62,379	62,553	64,754	66,906	68,538
2029/30	56,928	57,902	60,263	62,080	62,844	63,068	65,288	67,461
2030/31	56,394	56,951	58,353	60,694	62,545	63,355	63,602	65,845
2031/32	55,959	56,481	57,448	58,829	61,161	63,104	63,941	64,159
2032/33	55,444	55,948	56,815	57,777	59,155	61,621	63,546	64,340
2033/34	55,135	55,435	56,282	57,144	58,102	59,616	62,064	63,946
2034/35	54,955	55,127	55,770	56,612	57,469	58,561	60,059	62,466
2035/36	54,887	54,948	55,462	56,101	56,937	57,928	59,003	60,462
2036/37	54,908	54,880	55,284	55,792	56,426	57,395	58,369	59,405
2037/38	54,988	54,900	55,216	55,614	56,117	56,884	57,836	58,771
2038/39	55,107	54,979	55,235	55,546	55,938	56,575	57,324	58,238
2039/40	55,245	55,098	55,315	55,565	55,870	56,396	57,015	57,726
2040/41	55,381	55,235	55,433	55,644	55,889	56,328	56,836	57,417
2041/42	55,502	55,370	55,570	55,762	55,969	56,347	56,767	57,238
2042/43	55,795	55,490	55,705	55,899	56,087	56,426	56,786	57,169
2043/44	56,421	55,781	55,825	56,034	56,223	56,544	56,865	57,188
2044/45	57,136	56,403	56,115	56,154	56,358	56,680	56,983	57,267

Figure 1 presents projected enrolments under the three scenarios, including extended projections out to 2057/58. This longer-term projection illustrates how the projected fall in enrolment will be temporary in nature but may not return to the previous peaks due to a lower fertility rate.

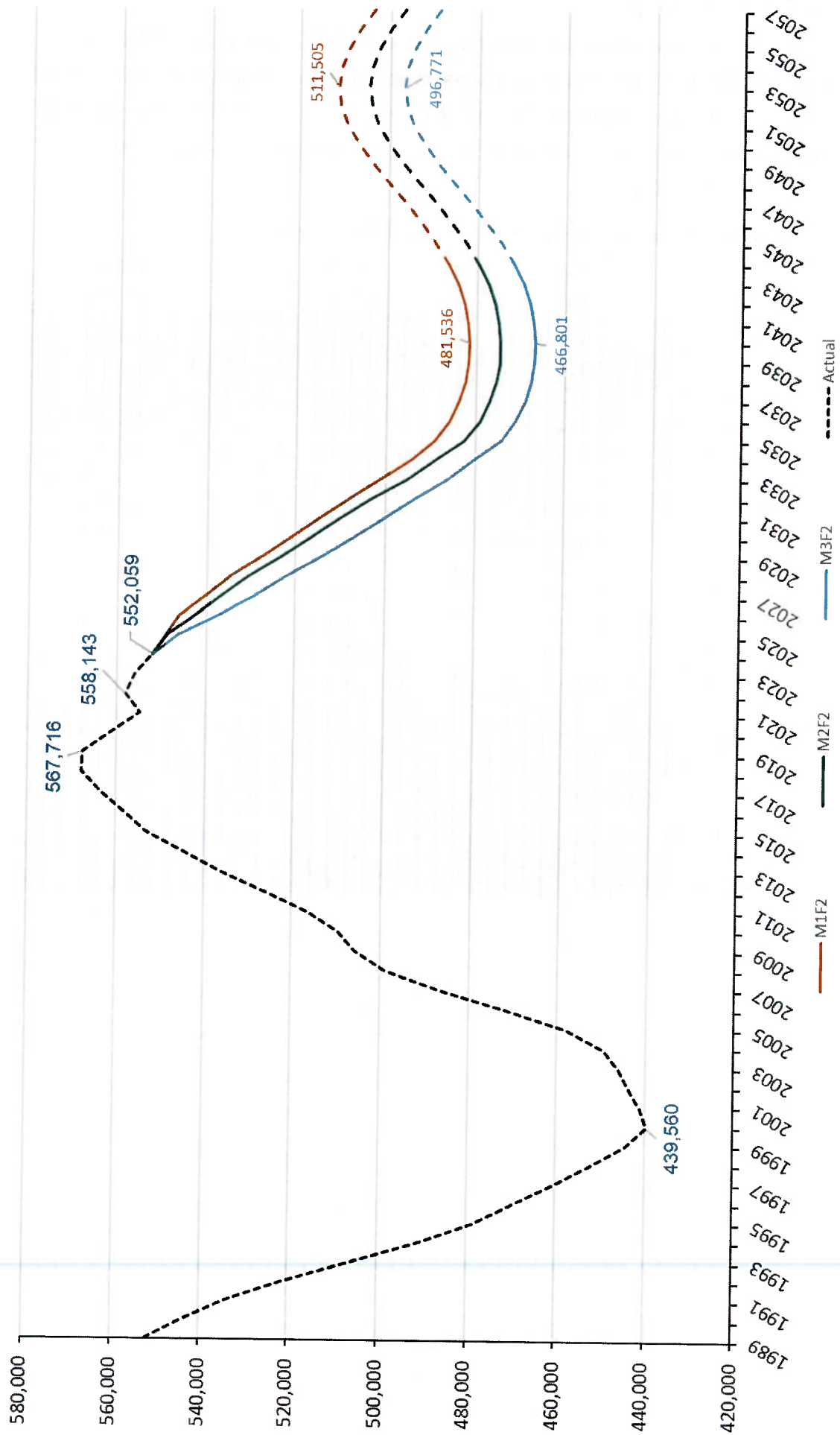


Figure 1: Past and projected enrolments (M1F2) in primary schools, 1989/90 – 2057/58

3.2 Post-Primary

Post-primary school enrolments have risen by almost 54,000 pupils since 2019/20, an increase of 14.5% in the last 5 years. Enrolments are expected to peak in 2025/26 under all three migration scenarios, with 429,350 students under the M1F2 scenario. From 2026/27 onwards, enrolments are projected to fall over the coming years, with a decrease of over 78,000 over the next 20 years.

Table 4: Projected enrolments in post-primary schools, 2025/26 – 2044/45

	M1F2	M2F2	M3F2
2024/25	425,411	425,411	425,411
2025/26	429,350	427,774	425,918
2026/27	429,057	425,493	421,027
2027/28	423,559	417,932	410,903
2028/29	418,312	411,554	403,370
2029/30	413,683	405,883	396,551
2030/31	410,330	401,611	391,158
2031/32	406,276	396,779	385,255
2032/33	400,376	390,175	377,590
2033/34	395,455	385,574	371,691
2034/35	391,338	380,640	365,762
2035/36	385,961	375,882	360,389
2036/37	379,680	369,297	353,574
2037/38	373,817	363,197	347,464
2038/39	368,508	357,500	342,012
2039/40	362,797	351,150	336,200
2040/41	357,299	345,521	331,028
2041/42	353,023	340,476	326,265
2042/43	350,214	337,551	323,477
2043/44	348,252	335,525	321,547
2044/45	346,899	334,132	320,215

3.2.1 Annual rises and falls

Table 5 presents the projected annual changes in enrolment out to 2044/45. As enrolments at primary level are projected to decrease, this will begin to carry over into post-primary level after the peak in 2025/26. Looking at the averages for the 10 year period covering the 2026/27 school year to the 2035/36 school year, the following decreases are projected:

- Around 4,300 decrease in pupil enrolments per annum under M1F2
- Around 5,200 decrease per annum under M2F2
- Around 6,550 decrease per annum under M3F2

The net loss for the period therefore is projected between 43,300 and 65,500 less pupils in post-primary.

Table 5: Projected absolute annual change (M1F2) in post-primary schools, 2025/26 – 2044/45

	M1F2	M2F2	M3F2
2024/25	8,981	8,981	8,981
2025/26	3,938	2,362	506
2026/27	-293	-2,281	-4,891
2027/28	-5,498	-7,561	-10,124
2028/29	-5,247	-6,378	-7,533
2029/30	-4,629	-5,671	-6,819
2030/31	-3,353	-4,272	-5,393
2031/32	-4,054	-4,832	-5,903
2032/33	-5,900	-6,604	-7,665
2033/34	-4,921	-4,601	-5,899
2034/35	-4,117	-4,934	-5,929
2035/36	-5,377	-4,758	-5,373
2036/37	-6,281	-6,585	-6,815
2037/38	-5,863	-6,100	-6,110
2038/39	-5,309	-5,697	-5,452
2039/40	-5,711	-6,350	-5,812
2040/41	-5,498	-5,629	-5,172
2041/42	-4,276	-5,045	-4,763
2042/43	-2,809	-2,925	-2,788
2043/44	-1,962	-2,026	-1,930
2044/45	-1,353	-1,393	-1,332

3.2.2 Projections by standard

Table 6 presents projections for each year by programme type under the M1F2 scenario.

The number of students entering 1st Year is projected to fall by over 13,500 from the 2024/25 peak of 73,237 to 59,681 over the next 20 years. For 6th Year, there will be an additional 7,865 students in 2026/27 than in 2024/25.

Table 6: Projected enrolments (M1F2) in post-primary schools, by standard, 2025/26 – 2044/45

	JC1	JC2	JC3	TY	LC1	LC2 (+ repeats)
2024/25	73,237	76,265	75,685	60,520	74,358	65,347
2025/26	72,189	73,816	76,566	59,085	77,456	70,238
2026/27	72,906	72,770	74,139	59,729	76,300	73,212
2027/28	72,365	73,252	72,872	57,210	75,781	72,078
2028/29	70,640	72,747	73,405	56,284	73,426	71,810
2029/30	70,880	71,035	72,905	56,673	72,628	69,561
2030/31	69,872	71,269	71,207	56,307	72,883	68,792
2031/32	68,326	70,269	71,436	55,065	72,146	69,033
2032/33	66,643	68,734	70,446	55,233	70,991	68,330
2033/34	66,823	67,060	68,922	54,508	70,916	67,225
2034/35	66,430	67,235	67,260	53,393	69,869	67,150
2035/36	64,952	66,845	67,432	52,178	68,403	66,151
2036/37	62,951	65,378	67,045	52,303	67,253	64,749
2037/38	61,895	63,389	65,590	52,021	67,275	63,646
2038/39	61,262	62,337	63,617	50,956	66,672	63,663
2039/40	60,730	61,707	62,571	49,513	65,188	63,087
2040/41	60,219	61,177	61,945	48,748	63,541	61,670
2041/42	59,910	60,669	61,419	48,289	62,643	60,093
2042/43	59,731	60,362	60,914	47,905	62,072	59,230
2043/44	59,662	60,184	60,609	47,535	61,580	58,682
2044/45	59,681	60,115	60,432	47,312	61,149	58,211

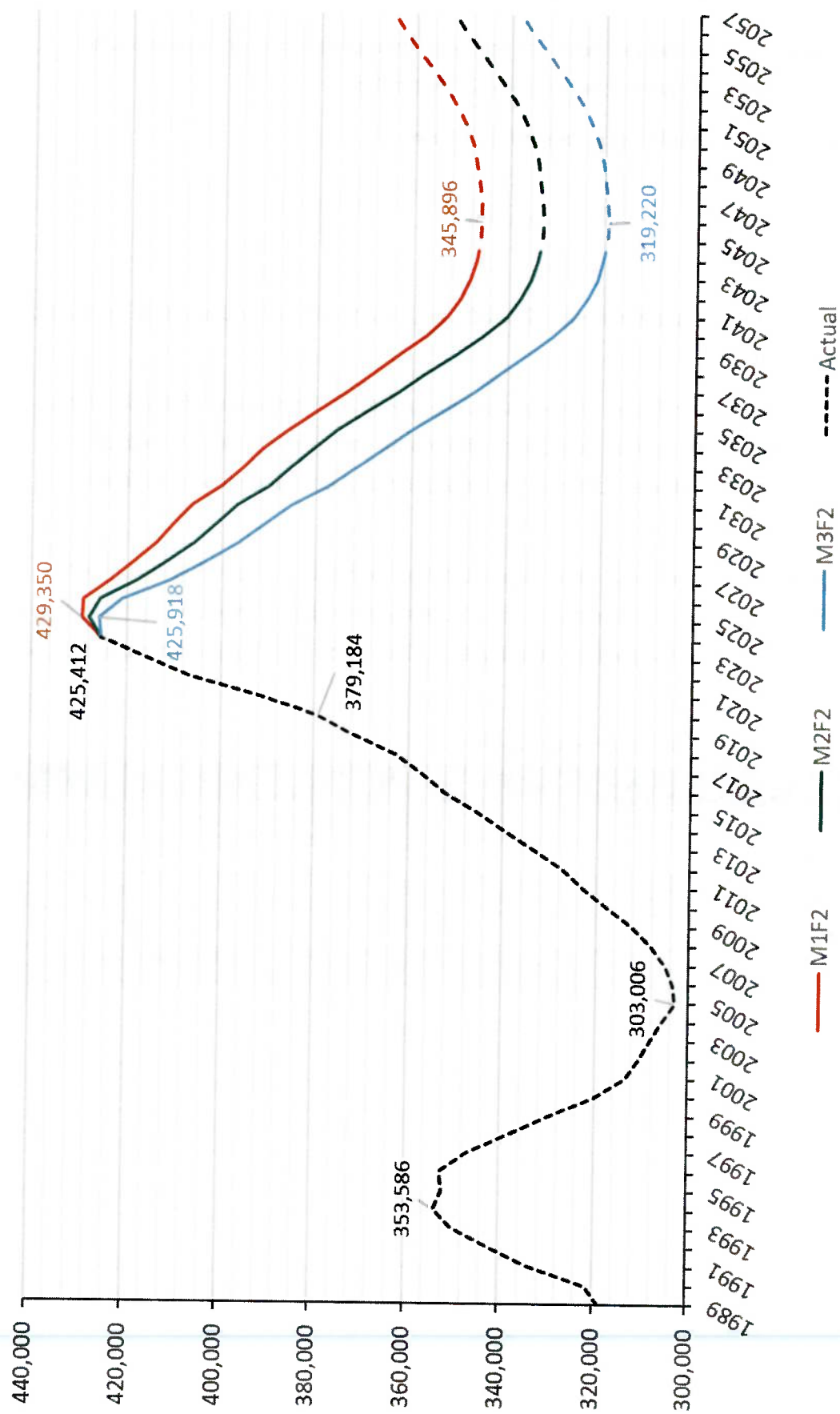


Figure 2: Past and projected enrolments (M1F2) in post-primary schools, 1989/90 – 2057/58

4 Review of 2023 Projections

This section presents a short review of the last published projections and outlines the updates to the projected figures made for the 2025 iteration.

The percent error of a prediction is defined as follows:

$$\frac{|Predicted\ Value - Actual\ Value|}{Actual\ Value} * 100$$

Table 18 shows the actual enrolment in 2024/25 at primary and secondary level compared to the projected values.

Enrolments at primary level were under-projected by 2,452. The majority of the difference was at Junior Infants and special education. The model has been updated to include migration of under 4s and has increased the rate of special education to match recent trends.

Enrolments at post-primary level were over-projected by 2,289. Some of this was due to under-projecting TY, and over-projecting at LC1. A large number of students were coming to Ireland to take TY but leaving before entering LC1. The model has been updated to account for this.

Table 18: Projected vs actual enrolments, 2024/25

2024/25		
<i>Education level</i>	<i>Primary</i>	<i>Post-Primary</i>
Actual enrolment	552,059	425,412
Most likely scenario (M1F2)	549,633	428,723
Difference	-2,426	+3,310
Percent error	-0.44% (under-projection)	+0.77% (over-projection)

5 Appendix

The following sections provide further information on the main assumptions and how they are integrated into the national model.

5.1 Migration

The most recent estimates of migration published by the CSO show net inward migration of 79,300 in the year up to April 2024, a slight increase from 77,700 in April 2023. Excluding the recent dip in migration due to the pandemic, this is the tenth consecutive year to show strong net inward migration, although the rate of increase appears to be decreasing.

Migration at primary level has been high in recent years, with net inward migration at almost 6,000 in 2023/24 and 4,600 in 2022/23, excluding Ukrainian pupils. These are higher than the numbers during the COVID-19 pandemic, which were 1,900 in 2021/22 and 1,400 in 2020/21. Due to this, and CSO projections of lower migration in the coming years, all primary assumptions are high in the short-term before falling over the coming years.

Table 19: Primary migration assumptions

	2025/26	2026/27	2027/28 – 2031/32	2032/33 – 2057/58
M1	6,500	6,000	4,300	3,500
M2	5,500	5,000	3,500	2,500
M3	4,000	3,500	2,000	1,300

Migration of those under four years of age has traditionally not been included in the model, as it is difficult to estimate. This is one factor that affects projections of enrolments in Junior Infants, causing them to be underestimated. To try account for this, a proportion of the CSO projections by single year of age were added to the Junior Infants entrance cohort.

Table 20: Under 4 migration assumptions

M1	M2	M3
1,080	780	480

Inward migration at post-primary level is based on the average inwards migration between 2020 and 2024 (8,261). In previous projections M2 was taken as the average flow from the previous few years, M1 was 1.5 times M2 and M3 was 0.5 times M2. To keep in line with overall migration assumptions (remaining high in short term and then falling), the methodology has been changed slightly.

Table 21: Post-primary migration assumptions

	2025/26 – 2026/27	2027/28 – 2057/58
M1	10,326 (1.25*average)	8,261 (average)
M2	8,261 (average)	6,196 (0.75*average)
M3	6,196 (0.75*average)	4,131 (0.5*average)

For outflows the retention rate, as published by the Department annually, is used. However, using this method alone it is not possible to account for international students who stay for less than a year. This is particularly common in Transition Year (TY) – 55% of new TY entrants from outside Ireland in 2023/24 left before starting 5th Year. The model has been adjusted to account for these leavers.

Table 22: Percentage of new post-primary entrants from outside Ireland who left the country the same year, by standard

	2021/22	2022/23	2023/24
JC1	14%	12%	11%
JC2	28%	26%	30%
JC3	44%	34%	38%
TY	48%	50%	55%
LC1	44%	40%	49%
LC2	14%	13%	19%

In 2024/25 the number of Ukrainian pupils has held relatively steady, with 17,495 students in October 2024 and 17,499 in May 2025. M1 assumes net zero migration from Ukraine, and that all Ukrainian pupils will stay in Ireland. The M2 and M3 scenario assume that 10% and 40% of Ukrainian pupils return home over the next three years.

Table 23: Ukrainian migration assumptions

	Primary			Post-Primary		
	2025/26	2026/27	2027/28	2025/26	2026/27	2027/28
M1	0	0	0	0	0	0
M2	- 210	- 420	- 420	- 140	- 280	- 280
M3	- 840	- 1,680	- 1,680	- 560	- 1,120	- 1,120

5.2 Fertility

The TFR in Ireland fell from 2.06 in 2009 to 1.7 in 2022. Aligning with CSO projections, the TFR is set to start at 1.55 in 2023, decrease gradually to 1.3 by 2038, and is then held constant for the remainder of the projections. The impact of recently increased migration on births is unknown and has not been factored into this iteration of the model.

Projected births are smoothed to align with the academic year. Births are projected to decline until 2030/31 before starting to rise again.

Table 24: Projected smoothed births by year, 2025/26 – 2044/45

2025/26	56,457	2035/36	55,874
2026/27	56,012	2036/37	55,958
2027/28	55,665	2037/38	56,531
2028/29	55,445	2038/39	57,233
2029/30	55,337	2039/40	57,870
2030/31	55,336	2040/41	58,433
2031/32	55,395	2041/42	58,895
2032/33	55,501	2042/43	59,233
2033/34	55,625	2043/44	59,425
2034/35	55,755	2044/45	59,461

5.3 Deaths

Assumptions on deaths are taken directly from the CSO projections for each single year of age. The effect of deaths on the overall projections is negligible given the small number of deaths (about 110 every year) involved.

5.4 Special education

Students enrolled in special classes and special schools, being a subset of the total student demographics, were previously estimated as a percentage of projected total enrolment. In this model however, the number of students in special schools and special classes is projected based on number of places allocated. This means that there is the same number of students in special education regardless of migration assumption. It is also important to note the model does not project the number of pupils with additional education needs that are enrolled in mainstream classes, only pupils in special schools and special classes are included in the modelling framework.

Table 25: Projections of students in special education, 2024/25 – 2042/43

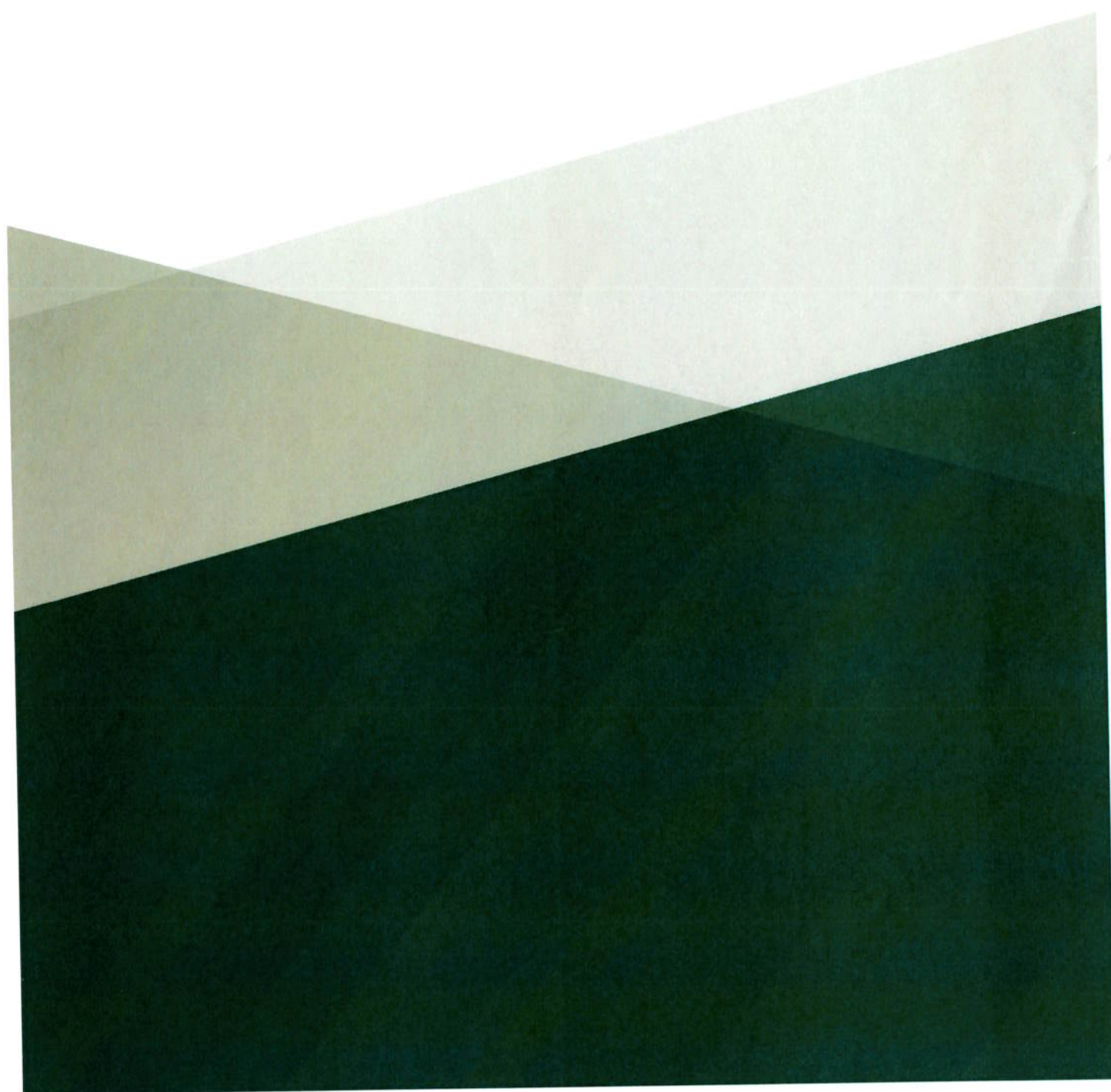
	Special Schools	Special primary classes	Special post-primary classes	% of total M1F2 enrolment
2024/25	9,680	13,317	5,437	2.6%
2025/26	9,980	14,918	6,062	3.2%
2026/27	10,280	16,313	7,457	3.5%
2027/28	10,580	17,708	8,852	3.9%
2028/29	10,880	19,103	10,247	4.2%
2029/30	11,180	20,498	11,642	4.6%
2030/31	11,480	21,893	13,037	5.0%
2031/32	11,480	21,893	13,037	5.0%
2032/33	11,480	21,893	13,037	5.1%
2033/34	11,480	21,893	13,037	5.2%
2034/35	11,480	21,893	13,037	5.2%
2035/36	11,480	21,893	13,037	5.3%
2036/37	11,480	21,893	13,037	5.4%
2037/38	11,480	21,893	13,037	5.4%
2038/39	11,480	21,893	13,037	5.5%
2039/40	11,480	21,893	13,037	5.5%
2040/41	11,480	21,893	13,037	5.5%
2041/42	11,480	21,893	13,037	5.6%
2042/43	11,480	21,893	13,037	5.6%
2043/44	11,480	21,893	13,037	5.6%
2044/45	11,480	21,893	13,037	5.6%

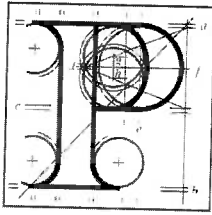
5.5 Other Primary level factors

A number of other factors, which have a smaller impact on overall figures at primary level, are included in the model, including transfers to and from the private sector and special education, as well as repeat rates in junior infants and 6th class in primary school.

5.6 Post Leaving Certificate Students

The projected enrolments refer to the school-based enrolments up to Leaving Certificate only and do not include PLC (Post Leaving Certificate) students.





An
Coimisiún
Pleanála

Memorandum LRD- ACP-324286-26

Note To File

From: Lisa Quinn SEO
Re: Applicants Response
Date: 22/06/25

Appeals were circulated by letters dated 15th May, 2026, 21st May, 2026 and 27th May, 2026.

The Applicants response to the appeals was received 12th June, 2026. This is outside the appropriate period of 4 weeks beginning on the day on which a copy of the appeal by P Gerard Boland was sent by the Commission as provided for in section 129(2)(a) of the Planning and Development Act 2000, as amended. Accordingly, the comments in relation to the appeal by P Gerard Boland may not be considered by the commission.

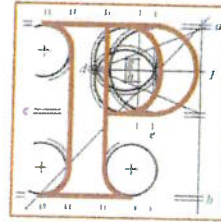
The response in relation to the others appeals was made within the specified time frame.

COPY

Our Case Number: ACP-324286-26

Planning Authority Reference Number: 2660241

Your Reference: Columbia Estates management (IE) Limite



An
Coimisiún
Pleanála

Genesis Planning Consultants
Dean Swift Building
Armagh Business Park
Hamiltonsbawn Road
Armagh
BT60 1HW
Northern Ireland

Date: 22 June 2026

Re: LRD: Construction of 523 residential units and a creche. An Environmental Impact Assessment Report (EIAR) and a Natura Impact Statement (NIS) have been prepared in respect of the proposed development and accompany this application. The planning application may also be inspected online at the following website set up by the applicant: www.monaleenroadlrd.com
Lands at Monaleen Road, Castletroy, Limerick

Dear Sir / Madam,

I have been asked by the Commission to refer to your submission in relation to the above-mentioned large-scale residential development appeal dated 12th June, 2026 in reply to the Commission's letters to you dated 15th May 2026, 21st May 2026 and 27th May 2026.

Your reply to the appeals was received on 12th June, 2026, this was outside the appropriate period of 4 weeks beginning on the day on which a copy of the appeal by P Gerard Boland was sent by the Commission as provided for in section 129(2)(a) of the Planning and Development Act 2000, as amended. Accordingly, your comments in relation to this appeal may not be considered by the commission.

However, your response to the other 3 appeals will take it into consideration in its determination of the appeal in accordance with the Planning and Development Act 2000, as amended.

Please note that section 129(4) of the 2000 Act provides that a party to an appeal shall not be entitled to elaborate in writing upon submissions or observations made or make any further submissions or observations in writing in relation to the appeal unless requested to do so by An Coimisiún Pleanála.

Teil
Glao Áitiúil
Láithreán Gréasáin
Ríomhphost

Tel
LoCall
Website
Email
(01) 858 8100
1800 275 175
www.pleanala.ie
communications@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

If you have any queries in the meantime, please contact the undersigned officer of the Commission at appeals@pleanala.ie.

Yours faithfully,



Suzanne Cleary
Administrative Assistant
Direct Line:

LRD20

Teil
Glao Áitiúil
Facs
Láithreán Gréasáin
Ríomhphost

Tel
LoCall
Fax
Website
Email

(01) 858 8100
1800 275 175
(01) 872 2684
www.pleanala.ie
communications@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902