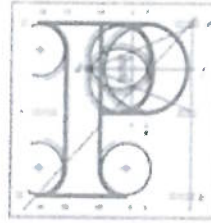


Our Case Number: ACP-324286-26

Planning Authority Reference Number: 2660241

Your Reference: Columbia Estates management (IE



**An
Coimisiún
Pleanála**

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

Date: 21 May 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,

Enclosed is a copy of a further large-scale residential development appeal under the Planning and Development Act, 2000, (as amended).

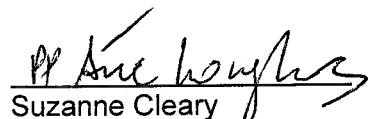
As you are aware, the planning authority's decision in the matter is already the subject of an appeal to the Commission. Under section 129 of the Planning and Development Act, 2000, (as amended), as a party to the appeal you may make submissions or observations in relation to the enclosed appeal in writing to the Commission within 4 weeks beginning on the date of this letter.

Please note when making a response/submission only to the appeal it may be emailed to appeals@pleanala.ie and there is no fee required.

Any submissions or observations received by the Commission outside of that period shall not be considered and where none have been validly received, the Commission may determine the appeal without further notice to you. Please quote the above appeal reference number in any further correspondence.

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:

LRD06

Teil
Glao Áitiúil
Láithreán Gréasáin
Ríomhphost

Tel
LoCall
Website
Email

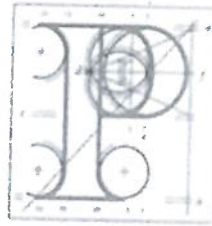
(01) 858 8100
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www.pleanala.ie
communications@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Our Case Number: ACP-324286-26

Planning Authority Reference Number: 2660241



**An
Coimisiún
Pleanála**

P Gerard Boland
Newcastle
Castletroy
Co. Limerick
V94 AV2P

Date: 21 May 2026

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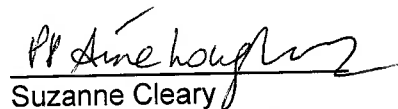
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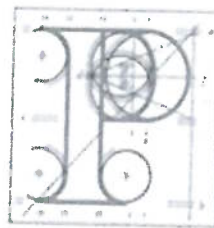
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Our Case Number: ACP-324286-26

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**An
Coimisiún
Pleanála**

Limerick City and County Council
Planning Department
First Floor, Limerick City and County Council Offices
Dooradoyle
Limerick
Co. Limerick

Date: 21 May 2026

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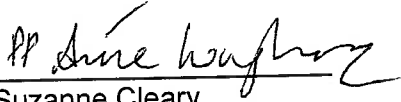
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D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Validation Checklist

Lodgement Number : **LDG-087981-26**
Case Number: **ACP-324286-26**
Customer: **Castletroy Golf Club**
Lodgement Date: **20/05/2026 09:50:00**
Validation Officer: **Dáire Littleton Caden**
PA Name: **Limerick City and County Council**
PA Reg Ref: **2660241**
Case Type: **Appeal - LRD**
Lodgement Type: **Appeal - LRD**



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Validation Checklist	Value
Confirm Classification	Confirmed - Correct
Confirm ABP Case Link	Confirmed-Correct
Fee/Payment	Valid – Correct
Name and Address available	Yes
Agent Name and Address available (if engaged)	Yes
Subject Matter available	Yes
Grounds	Yes
Sufficient Fee Received	Yes
Received On time	Yes
3rd Party Acknowledgement	Yes
Eligible to make lodgement	Yes
Completeness Check of Documentation	Yes
Valid Lodgement Channel	Yes

Multiple LRD

LRD01M ✓
LRD06 ✓ A. Long
21/05/26

Run at: 20/05/2026 12:12

Run by: Dáire Littleton Caden

Lodgement Cover Sheet - LDG-087981-26

LRD - Multiple

Details

Lodgement Date	20/05/2026
Customer	Castletroy Golf Club
Lodgement Channel	Post
Lodgement by Agent	Yes
Agent Name	AK Planning & Development Ltd
Correspondence Primarily Sent to	Agent
Registered Post Reference	

Categorisation

Lodgement Type	Appeal
Section	Processing

Fee and Payments

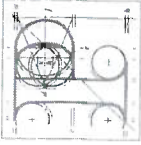
Specified Body	No
Oral Hearing	No
Fee Calculation Method	System
Currency	Euro
Fee Paid	220.00
Refund Amount	

28/04/26

L/O 25/05/26

Appeal

An
Coimisiún
Pleanála



Lodgement ID	LDG-087981-26
Map ID	
Created By	Kwabena Anno-Asante
Physical Items included	No
Generate Acknowledgement Letter	
Customer Ref. No.	
PA Reg Ref	

PA Name	Limerick City and County Council
Case Type (3rd Level Category)	

Observation/Objection Allowed?	
Payment	PMT-069960-26
Related Payment Details Record	PD-069789-26

LRD 01/14

PA Case Details Manual	
PA Case Number	
PA Decision	
PA Decision Date	
Lodgement Deadline	
Development Description	
Development Address	

Appeals Type	
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Millside, Mill Road, Corbally
Limerick, Ireland V94 46X5
T: +353 61 341782 | M: +353 86 6887402
E: info@akplanning.ie

An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

08 May 2026

AN COIMISIÚN PLEANÁLA	
LDG-	087981-26
ACP-	
20 MAY 2026	
Fee: €	220 Type: Chg
Time:	9:45 By: nag post

RE: Third Party Appeal against decision of Limerick City and County Council to grant planning permission

APPEAL PARTICULARS

LCCC Ref:	26/60241
Applicant:	Columbia Estates Management (IE) Limited
Appellant:	Castletroy Golf Club
Description:	Large-Scale Residential Development (LRD), 523 no. residential units comprising 214 no. 2–3 storey houses (10 no. 2-bed, 204 no. 3-bed) and 309 no. apartment units (159 no. 1-bed, 141 no. 2-bed, 9 no. 3-bed) within 10 no. apartment buildings of 4–5 storeys, together with a crèche facility, basement car parking for Blocks 6–9, surface car parking, ESB substations, bicycle storage, public open space, landscaping and all associated site works. An EIAR and NIS accompany the application.
Location:	Lands at Monaleen Road, Castletroy, Limerick
Date of Decision:	28 April 2026 (Limerick City & County Council, Grant Permission)
Prepared By:	Adam Kearney BA MA MIPI MRTPI, AK Planning & Development Ltd
On Behalf Of:	Castletroy Golf Club, Kilbane, Golf Links Road, Castletroy, Limerick

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Appendix A: Golf Safety Impact Assessment

1 Introduction

AK Planning, on behalf of Castletroy Golf Club, hereby submits this third-party appeal against the decision of Limerick City and County Council to grant planning permission under Reference 26/60241 to Columbia Estates Management (IE) Limited for a Large-Scale Residential Development (LRD) of 523 residential units on lands at Monaleen Road, Castletroy, Limerick.

Castletroy Golf Club is a long-established sporting and recreational facility whose lands directly adjoin the southern and south-western boundaries of the application site. The Club is not opposed in principle to appropriate residential development on zoned lands; however, the decision under appeal is fundamentally flawed and must be overturned or, in the alternative, subjected to substantially more robust conditions than those currently imposed.

This appeal is made in the context of a materially related and parallel development. An Coimisiún Pleanála granted permission under Case Reference LH91.323968 (LCCC Ref: 25/60271) for an adjacent LRD of 114 units at Golf Links Road, Castletroy. The cumulative impact of both schemes and the consistency of approach required across the two decisions are addressed in Section 8 of this appeal.

The Club's appeal is grounded in the following primary grounds:

- Failure to require an adequate ball-strike risk assessment, in circumstances where a professional Golf Safety Impact Assessment was submitted identifying a clear and ongoing hazard from Holes 1 and 2 of the course.
- Failure to provide adequate boundary protection, with the applicant's proposed 1.8-metre weld mesh fence being wholly inadequate and the planning authority's condition for a 2.5-metre wall being manifestly insufficient in the absence of protective netting.
- Abandonment of the established 30-metre buffer zone that has applied to previous permissions on this land, in direct conflict with the planning history of the site.
- Failure to apply the Agent of Change principle, a well-established planning doctrine requiring the party introducing a sensitive use to bear responsibility for ensuring compatibility with the established use.
- Non-compliance with Objective SCS1 O20 of the Limerick City and County Development Plan 2022–2028, which requires the Council to protect, retain and enhance existing sports grounds and facilities.

- Failure to require a noise impact assessment of the Club's early morning maintenance operations, notwithstanding that objectors explicitly raised this issue and it was acknowledged in the planner's report.
- The inadequacy of the Environmental Impact Assessment Report (EIAR), which fails to properly characterise, assess or mitigate the operational and safety impacts on the established sporting use.
- Cumulative impact: this development, combined with the already-permitted 114-unit scheme to the west, creates a wholly encircling residential environment whose aggregate impact on the Club's operations has never been assessed.

2. The Appellant and the Proposed Development

Castletroy Golf Club was founded in 1937 and has operated continuously on its current lands at Kilbane, Golf Links Road, Castletroy. The Club has in excess of 1,300 members and employs a substantial number of full-time and part-time staff, constituting a significant community, recreational, and economic asset in the area.

The Club's lands directly bound the southern and south-western site boundary of the application site at Monaleen Road. The application site, as confirmed in the applicant's own Urban Design Statement and in the planner's report, is "immediately bordered" by Castletroy Golf Club to the south. The proximity of the proposed development to the operational fairways, tee boxes and maintenance compound of the Club gives rise to the concerns set out in this appeal.

Planning Reference 26/60241 provides for a 523-unit Large-Scale Residential Development on a 9.7-hectare greenfield site at Monaleen Road, Castletroy. Of critical importance to this appeal is the layout of the southern portion of the site, which is in direct proximity to the operational boundaries of Castletroy Golf Club. The planner's report acknowledges the following:

- Apartment Block 1 is situated 18.4 metres from the southern boundary and 15.8 metres from the south-western boundary with the Golf Club.
- There is communal open space to the south and south-west of Block 1 immediately adjoining the Golf Club boundary.
- Apartment Blocks 2 to 5 are situated over 22 metres from the southern boundary.

House No. 23 appears to be situated less than 22 metres from the southern boundary; no dimension is given in the plans.

The applicant proposes only a 1.8-metre weld mesh fence along the southern boundary with the golf course, being the boundary treatment proposed for the most safety-critical boundary within the development: the boundary between a 5-storey apartment complex and an active golf course fairway. In response to the Club's submission, the planning authority has conditioned a 2.5-metre concrete block wall with mature planting. While this is an improvement on the applicant's proposal, it remains wholly inadequate to address the ball-strike hazard documented by the Club's technical experts and to protect the safety of future residents.

3. Failure to Assess and Mitigate the Ball-Strike Hazard and Consequential Operational Impacts

3.1 The Nature of the Hazard

The proposed development places apartment buildings, communal open space, public open space, pedestrian routes and houses directly adjacent to the active fairways and landing zones of Holes 1 and 2 of Castletroy Golf Club. As documented in the Golf Safety Impact Assessment prepared by E.B. Connaughton Ltd, specialist golf course designers, this area is within the predictable miss-zone of those holes and currently receives stray golf balls on a regular basis.

Golf balls travel at high velocity and, on a miss-hit from a driver at a par-4 or par-5 hole, can carry well more than 200 metres. The trajectory of errant shots is, by its very nature, unpredictable. Residential apartments, communal open spaces, children's play areas and pedestrian routes within proximity to an active golf course represent extremely sensitive receptors.

The Club's professional safety cone analysis, submitted to the planning authority, demonstrates the extent of the hazard zone and the degree to which the proposed development falls within it. Despite this clear and professionally evidenced submission, the planning authority did not require the applicant to commission any independent ball-strike risk assessment, any trajectory modelling or any analysis of the adequacy of the proposed boundary treatment to address this hazard.

3.2 The Applicant's Response is Inadequate

The applicant's response to the Club's safety concerns is remarkable for its brevity and its failure to engage with the substance of the hazard. The applicant's Planning Statement contends that "it is not practical for a ball net to be constructed as this would not be the responsibility of the applicant and also not align with good ecological practice."

This response is deficient on multiple grounds:

- The ecological argument is a pretext. The erection of safety netting along a boundary does not preclude ecological mitigation and the two objectives are entirely compatible. Protective netting has been installed along golf course boundaries in numerous similar situations throughout Ireland and the United Kingdom without adverse ecological consequence.
- The responsibility argument inverts the Agent of Change principle (addressed in Section 4). Where a developer introduces a sensitive residential use adjacent to an established sporting use, it is the developer's responsibility to ensure compatibility, not the established use's responsibility to accommodate the incoming development.
- The statement that netting is "not practical" is unsubstantiated. No engineer's report, no cost assessment, no technical analysis and no alternative mitigation proposal was provided.

3.3 The Planning Authority's Response is Insufficient

The planning authority's acknowledgement of the safety concern is, with respect, superficial. The planner's report records: "The concerns raised in relation to the location of the southern part of the development in proximity to Castletroy Golf Club are noted however, the application site is zoned for residential development."

This statement cannot stand as a sufficient response to a documented, ongoing physical hazard. Zoning establishes the principle of residential use; it does not discharge the obligation to ensure that the development can be delivered safely and without unreasonable risk to future occupants. A site that is zoned for residential use may nonetheless require specific mitigation to render it safe for residential occupation, particularly where it is adjacent to an established use of the character of a golf course.

The condition imposed by the planning authority (relating to the 2.5m wall and mature planting) falls short in the following respects:

- A 2.5-metre concrete block wall does not address the trajectory of a golf ball. A ball driven at height from the adjacent tee boxes will travel over a 2.5-metre wall with ease. The wall addresses trespass; it does not address the ball-strike hazard.
- No independent ball-strike risk assessment was required. The only technical safety assessment on the file is the one submitted by the Club, which was then largely disregarded.
- No protective netting was required at any height, notwithstanding that the Club's assessment identified a need for netting of at least 20–30 metres in height to intercept errant shots.
- No buffer zone from the boundary was required within the application site, despite a 30-metre buffer zone having been applied to previous planning permissions on this very land (addressed in Section 6).
- No condition was imposed requiring the developer to consult with the Golf Club on the adequacy of boundary protection measures prior to commencement.

3.4 Consequential Impacts on the Club's Operations

In the absence of adequate mitigation, the proposed development as approved creates a foreseeable and predictable pattern of nuisance and conflict with direct consequences for the Club's long-term viability.

Ball Strike

Golf balls will enter the development. This is not a speculative risk; it is a documented, ongoing occurrence. Residents of the new development, including children using open spaces and communal areas adjacent to the boundary, will be exposed to the ball-strike hazard. When, not if, a resident is struck by a golf ball, the Club will face insurance exposure and potential litigation. The Club will also face pressure to restrict its operations, reconfigure its course layout, alter tee positions and modify maintenance schedules. None of these consequences were assessed by the planning authority.

Trespass and Anti-Social Behaviour

The introduction of a large residential population, including children and young people, immediately adjacent to an open golf course creates a foreseeable risk of trespass, vandalism, equipment theft and interference with play. Golf course equipment is high-value and largely unsecured during operational hours. The planning authority did not assess this risk and imposed no conditions to address it beyond a 2.5-metre boundary wall.

Operational Restriction

The cumulative effect of noise complaints, ball-strike incidents and trespass events is likely to generate significant pressure on the Club to curtail or modify its operations. Planning and environmental enforcement authorities respond to complaints from residents. The Club, as an established use, has no defence against complaints arising from its normal operational activities if those activities are now deemed to conflict with the amenity of an adjacent residential population. The planning authority has created this conflict by approving the development without requiring adequate mitigation, and the Club will be left to absorb the consequences.

Insurance

The prospect of claims from future residents arising from ball strikes, noise or other operational matters will inevitably affect the Club's insurance position. The Club should not be required to bear increased insurance costs because of a planning decision that introduced incompatible residential development onto its boundaries without adequate protection.

4. Failure to Apply the Agent of Change Principle

A central and fundamental error in the planning authority's assessment is its failure to apply the well-established planning principle that an existing lawful use must not be compromised by the introduction of a new, more sensitive use. This principle, the agent of change doctrine, requires that the party introducing the sensitive use bears the responsibility for ensuring that the new use can coexist safely and without generating conflict, nuisance or operational restrictions on the established use.

The agent of change principle is embedded in UK national planning policy and is routinely applied by planning inspectors in analogous situations involving the relationship between residential development and established sporting, cultural or noise-generating uses. Although

not codified in Irish statute, the principle is widely recognised in planning practice and its application is consistent with, and demanded by, the proper planning and sustainable development of the area. Its relevance does not depend upon statutory footing; it is a principle of rational decision-making that must inform any competent planning assessment where a proposed development is located adjacent to an established and pre-existing use.

In the present case:

- Castletroy Golf Club has operated since 1937, predating the planning system itself.
- The proposed development is a new, sensitive residential use being introduced adjacent to the Club's operational boundaries.
- The foreseeable consequences of this juxtaposition, namely ball strikes, noise complaints, trespass and insurance claims, are matters that the developer should be required to address as part of the planning process, not matters to be visited upon the Club after permission is granted.
- The planning authority has effectively shifted the entire burden of risk, liability and future operational restriction onto the Golf Club by granting permission without requiring the developer to demonstrate how compatibility will be achieved.

The planning authority's response, that the site is zoned for residential use, does not engage with the agent of change principle at all. It acknowledges the right of the land to be developed but says nothing about the developer's obligation to ensure that the development can coexist with the Golf Club. These are separate questions, and both must be answered before permission can properly be granted.

The Board is respectfully requested to give full weight to the agent of change principle in its assessment of this appeal and to require the developer to demonstrate, through a professionally prepared ball-strike risk assessment, a noise impact assessment and a comprehensive boundary treatment scheme, that the proposed development can coexist with Castletroy Golf Club without placing an unreasonable burden on its operations.

5. Non-Compliance with the Limerick Development Plan 2022–2028

5.1 Objective SCSi O20: Protection of Sports Grounds

Objective SCSi O20 of the Limerick City and County Development Plan 2022–2028 requires the Council to protect, retain and enhance existing sports grounds and facilities. This is an express statutory objective of the Development Plan, carrying the legal weight of Section 34(2)(a) of the Planning and Development Act 2000 (as amended), which requires that decisions on planning applications be made in accordance with the provisions of the Development Plan except in exceptional circumstances.

The planner's report for planning reference 26/60241 does not reference Objective SCSi O20. It does not analyse the impact of the proposed development on the operational viability of Castletroy Golf Club. It does not assess whether the conditions imposed are sufficient to protect the Club from the foreseeable consequences of introducing a 523-unit residential development on its boundaries. This is a material omission and constitutes a failure to apply the statutory Development Plan and is a ground of legal vulnerability.

Castletroy Golf Club is explicitly recognised in the Development Plan itself. The UCA O3 (Castletroy/Plassey/Annacotty) chapter identifies "recreational facilities such as the Castletroy Golf Club" as a defining and valued feature of the character area. The Club is therefore not merely an incidental neighbour of the application site; it is a named and recognised element of the area's character that the Development Plan expressly requires to be protected.

A decision that does not apply Objective SCSi O20 to an application that directly affects the operational integrity of Castletroy Golf Club fails to comply with the statutory requirement of Section 34(2)(a) and must be reviewed on appeal.

6. Abandonment of the Established 30-Metre Buffer Zone

A significant and unaddressed issue in the planning authority's assessment is the abandonment of the 30-metre buffer zone that has applied to previous planning permissions on this site. The Club's submission to the planning authority noted, and the planner's report records, that previous planning applications on these lands incorporated a 30-metre buffer zone along the boundary with the Golf Club. This buffer zone was established precisely to protect the Club's

operations and to maintain a zone of separation between active golf course lands and sensitive residential receptors.

The proposed development does not maintain this buffer zone. Apartment Block 1 is only 18.4 metres from the southern boundary and 15.8 metres from the south-western boundary. House No. 23 appears to be within the former buffer zone area. Communal open space, which will be used by children and residents, is proposed immediately adjacent to the golf course boundary.

The planning authority has not addressed the departure from the established buffer zone in its assessment. There is no planning justification offered for reducing or abandoning a protection that was built into previous permissions for good reason. The Club submits that the 30-metre buffer zone should be reinstated as a condition of any permission, that no residential units should be located within 30 metres of the golf course boundary, and that the communal open space immediately adjoining the boundary should be redesigned to ensure that sensitive receptors are not placed in harm's way.

7. Failure to Require a Noise Impact Assessment

The Club's maintenance compound begins operations at 6am daily using heavy machinery, including ride-on mowers, tractors, grass-cutting equipment and other mechanised tools. This is a standard and necessary feature of professional golf course management and is not capable of being suppressed or significantly reduced without compromising the quality of the course.

The proposed development will place hundreds of residential units, including 5-storey apartment buildings, within close proximity to the Club's maintenance operations and operational fairways. Future residents who are disturbed by early-morning noise from the Golf Club will have a reasonable expectation of quiet enjoyment of their dwellings. The foreseeable outcome is a pattern of noise complaints directed at the Club, which will in turn generate pressure on the Club to curtail, restrict or modify its operations, including, potentially, the commencement time of maintenance activities.

Despite this clear and foreseeable risk, the planning authority did not require the applicant to commission a noise impact assessment of the Club's maintenance operations. The issue was raised explicitly in the Club's submission and was noted in the planner's report: "Impact of noise from golf club due to early morning maintenance on future occupants requires mitigation, in

interests of residential amenity.” Yet the planner’s report then fails to require any noise assessment and imposes no conditions to address this acknowledged concern.

This is a material omission. The proper planning and sustainable development of the area requires that the noise environment into which 523 residential units are being introduced is properly characterised and that adequate mitigation is specified where required. The failure to require this assessment deprives the planning authority, and the Board, of the information necessary to make an informed decision on this aspect of the development.

8. Cumulative Impact and Consistency with An Coimisiún Pleanála’s Decision at 25/60271

An Coimisiún Pleanála granted planning permission for a 114-unit LRD at Golf Links Road and Mount Green Road, Newcastle, Castletroy (LCCC Ref: 25/60271 / ACP Case Reference LH91.323968, signed 15 April 2026). The permitted development at 25/60271 is located to the west of the Golf Club’s 1st hole. The proposed development at 26/60241 is located to the north and north-west of the Club’s operational boundary.

Taken together, these two developments effectively encircle the northern and north-western boundaries of Castletroy Golf Club with residential development. The cumulative impact of both schemes, in terms of ball-strike risk, noise, trespass, residential amenity pressure and operational constraint, has never been assessed. The EIAR for 26/60241 makes no reference to cumulative impacts arising from the combination of the two developments.

This is a significant gap. The aggregate residential population introduced by both developments will substantially increase the pressure on the Club’s operations beyond what either development, considered in isolation, would generate. A 523-unit scheme adjacent to an operational golf course is a materially different proposition when assessed alongside a permitted 114-unit scheme on the same boundaries. The Board should require this cumulative assessment to be carried out.

The Board is additionally requested to note a fundamental point of institutional consistency. The planner’s report at 26/60241 itself relies on the Board’s determination at 25/60271 as a

precedent for the imposition of the 2.5-metre boundary wall condition, stating that it is “consistent with the residential proposals to the west at Golf Links Road and Mount Green Road.

If the Board’s decision at 25/60271 is to be treated as a relevant precedent, the Club submits that the full scope of the concerns raised in that appeal, including the need for protective netting, a ball-strike risk assessment and a noise impact assessment, should be applied consistently to this development. A 2.5-metre wall was not the only or primary mitigation sought in the context of 25/60271; it was one element of a package of protective measures. To adopt the wall condition as a standalone precedent, while disregarding the Club’s requests for netting, a ball-strike assessment and a noise assessment, is to apply the precedent selectively and inconsistently.

The Club respectfully submits that the Board should apply its own institutional consistency and require the same standard of protection here as was recognised as appropriate in the context of the adjacent development.

9. Requested Reliefs

Castletroy Golf Club respectfully requests that An Coimisiún Pleanála refuse planning permission under Reference 26/60241 on the grounds set out in this appeal.

Should the Board be minded granting permission, the Club requests that the following conditions be imposed as an absolute minimum:

Ball-Strike Safety

- A full ball-strike risk assessment shall be carried out by a suitably qualified golf course safety engineer (at the developer’s cost) and submitted to and agreed in writing with the planning authority and the Golf Club prior to the commencement of development. The assessment shall address Holes 1 and 2 of Castletroy Golf Club and shall identify all residential receptors, communal open spaces and pedestrian routes within the predicted miss-zone of those holes.
- Developer-funded installation of protective safety netting along the full length of the southern and south-western boundary with the Golf Club, to a minimum height of 20

metres (or such height as the ball-strike risk assessment may determine), prior to occupation of any unit within 100 metres of the golf course boundary.

- Construction of a minimum 2.5-metre concrete block wall along the full length of the boundary with the Golf Club, with dense double-layer planting to a height of not less than 3 metres on the residential side of the wall, prior to occupation of any unit adjacent to the golf course boundary.

Buffer Zone

- A 30-metre buffer zone shall be maintained within the application site along the boundary with Castletroy Golf Club. No residential unit, communal open space, children's play area or pedestrian route shall be positioned within 30 metres of the golf course boundary. The layout of the development shall be revised to comply with this condition prior to commencement of development.

Noise Assessment

- A noise impact assessment of the Club's maintenance operations (including early morning operations commencing at 6am) shall be prepared by a suitably qualified acoustics engineer at the developer's cost, submitted to and agreed in writing with the planning authority and the Golf Club prior to commencement of development. The assessment shall identify all noise-sensitive receptors and shall specify adequate mitigation measures.
- All mitigation measures identified in the noise impact assessment shall be implemented prior to first occupation of any unit and shall be maintained for the lifetime of the development.

Legal and Operational Protections

- Any necessary reconfiguration of the layout or design of Holes 1 and/or 2 of Castletroy Golf Club as a consequence of the proposed development must be carried out at the developer's cost, to a standard agreed with the Golf Club and approved by a suitably qualified golf course designer.

Access During Construction

- Prior to commencement of development, a Construction Traffic Management Plan shall be submitted to and agreed in writing with the planning authority and the Golf Club. The plan shall ensure that access to the Golf Club from Monaleen Road and Golf Links Road is always maintained during the construction period and shall include specific provisions for the protection of access during peak tee-time periods on weekends and bank holidays.

10. EIAR Deficiencies: Construction and Operational Impacts

10.1 Legal Framework: EIAR as a Precondition for Permission

The proposed development, comprising 523 units, triggered the mandatory preparation of an Environmental Impact Assessment Report (EIAR) under Schedule 5(B)(i) of the Planning and Development Regulations 2001, as amended. The EIAR is required, under Article 94 and Schedule 6 of those Regulations, to identify, describe and assess the direct and indirect significant effects of the proposed development on the environment.

A lawful and adequate EIAR is a precondition for the grant of planning permission for a development of this scale. Beyond the ball-strike, noise and cumulative omissions addressed in earlier sections, the EIAR is deficient across a further range of construction and operational impacts that will directly affect the Club's operations over the 10-year programme. None were identified, assessed or conditioned by the planning authority. The specific deficiencies are as follows:

10.2 Earth Shift and Excavation Volumes

The proposed development includes basement car parking for Apartment Blocks 6, 7, 8 and 9. The excavation of four basement levels on a 9.7-hectare site will generate enormous volumes of material that must be removed via Monaleen Road, the primary access road serving Castletroy Golf Club. The EIAR does not disclose the volume of material to be removed, the number of HGV movements required, the duration over which removal will occur, or the routing of HGVs.

The EIAR's response to this foreseeable impact states: "Due regard will be paid to minimising any impacts by construction vehicles on the existing developments in the area. Should an issue

arise in respect of construction traffic, then the position will be reviewed by the Project Team and changes made.” This is not an assessment. It is a statement of intent to react to problems as they arise. For an entity such as Castletroy Golf Club, whose commercial and operational viability depends on reliable, unimpeded access for members, visitors and delivery vehicles, the absence of a quantified muck shift assessment and a specific access protection scheme is a material deficiency.

10.3 Ten-Year Construction Programme

The applicant seeks a 10-year planning permission structured into five phases. The Golf Club will be located immediately adjacent to an active major construction site for up to a decade. The EIAR treats the construction phase as ‘short-term’ and characterises most impacts as temporary. This framing is misleading and inappropriate where the construction programme extends across 10 years. In standard EIA terminology, ‘short-term’ refers to effects lasting less than 3 years. A 10-year construction programme is a medium to long-term impact and should have been assessed as such.

A decade of sustained construction activity on the Club’s northern and north-western boundaries will generate ongoing noise, dust, vibration, light intrusion and access difficulties. The Club’s business model depends on attracting members, visitors and corporate clients. Commercial impacts, including membership atrophy, loss of society bookings and decline in corporate golf days, were not considered in the EIAR.

10.4 Construction Noise and Vibration

Chapter 12 of the EIAR assesses noise and vibration impacts with reference to nearby residential properties as the sensitive receptors. Castletroy Golf Club is not identified as a sensitive receptor in the noise and vibration assessment. This is a significant omission. The Golf Club is an active sporting and commercial facility where quiet and concentration are essential features of the user experience. Construction noise from pile driving, excavation, concrete work and HGV movements will be audible throughout the portions of the course adjacent to the application site.

Vibration from heavy construction plant, and in particular from pile driving associated with the basement construction, is also capable of damaging sensitive course infrastructure, including

the compacted sub-bases of greens, tees and pathways near the boundary. No vibration impact assessment has been carried out with reference to the Golf Club's infrastructure.

10.5 Dust: Golf Course Greens Not Identified as Sensitive Receptors

Chapter 13 of the EIAR assesses air quality and dust impacts and relies on the absence of residential properties within 250 metres to downgrade the sensitivity classification of the surrounding area. The Golf Club's course, which bounds the southern boundary of the site, is entirely omitted from the sensitive receptor assessment.

Golf course greens and playing surfaces are acutely sensitive to dust contamination. Airborne construction dust deposited on a golf green can damage or destroy closely managed turf, block drainage systems, contaminate irrigation water, and render greens unplayable. The failure to identify the Golf Club's playing surfaces as sensitive receptors results in an underestimation of dust risk and conditions calibrated only to protect residential properties.

10.6 Surface Water Drainage and Altered Run-Off Patterns

The conversion of a 9.7-hectare greenfield site to a hard-surfaced residential development will fundamentally alter the surface water run-off regime. The land slopes down toward the Golf Club boundary. While the EIAR proposes SuDS measures, it does not consider the impact of altered run-off patterns on the Club's own drainage and irrigation infrastructure. Fairways and greens adjacent to the boundary are highly sensitive to changes in groundwater levels and surface water ingress. No hydrogeological assessment of the interaction between the proposed drainage system and the Club's course infrastructure has been carried out.

10.7 Light Pollution from Five-Storey Apartment Blocks

The proposed development includes ten apartment buildings of 4 to 5 storeys positioned adjacent to the Golf Club's southern boundary. Five-storey residential apartment buildings generate significant artificial light output at night and in the early morning. Castletroy Golf Club operates during early morning and evening hours in the summer season. Light pollution from apartment buildings overlooking the course will adversely affect the ambiance of the playing environment.

Objective EH O24 of the Limerick City and County Development Plan require external lighting schemes to minimise light spillage. No assessment of light spill from the proposed apartment buildings toward the Golf Club has been carried out, and no conditions addressing light management at the southern boundary have been imposed.

10.8 Wastewater Pumping Station: Permanent Operational Noise

A wastewater pumping station is proposed to serve 34 units in the north-western area of the site, operating 24 hours a day. The noise assessment does not assess its impact on the Golf Club's maintenance compound or adjacent course areas. No condition limits the pumping station's noise output with reference to the Club's operations.

10.9 Overlooking and Visual Intrusion onto Playing Surfaces

Five-storey apartment buildings directly overlooking the Club's fairways, tees and greens will fundamentally alter the visual character of the playing environment. The EIAR addresses visual impact solely from the perspective of external viewpoints of the development; it does not consider what the Club's members will experience looking outward from the course. The commercial consequences for the Club's membership and visitor trade have not been assessed.

10.10 Traffic Impact: Road Network Disruption During Construction and Operation

Castletroy Golf Club is accessed via Golf Links Road, which connects to the R445 Dublin Road. The Traffic and Transport Assessment (TTA) prepared by Roadplan Consulting was scoped to examine only two junctions on Monaleen Road and does not consider Golf Links Road, the R445/Golf Links Road junction, or any other element of the road network used by Club patrons. This is a significant gap in an assessment covering a development generating in excess of 1,400 resident vehicle trips per day over a 10-year construction programme.

The TTA traffic counts were carried out during a 7-day period in November 2025, a period entirely unrepresentative of peak golf traffic conditions. The golf season in Limerick reaches its peak between April and September; competition days and club open days generate concentrated bursts of traffic on weekend mornings between 7am and 10am. Traffic counts taken in November capture none of this demand.

The disruption during the construction phase is compounded by the scale of the off-site infrastructure works required. The Civil Engineering Report confirms that the foul sewer along both Monaleen Road and the R445 Dublin Road must be upgraded, involving open-cut trenching along a regional road carrying significant volumes of traffic including Golf Club patrons. Critically, the Civil Engineering Report confirms that the required sewer upgrade works are not currently included within Uisce Éireann's capital investment programme, meaning these works will be programmed and managed solely by the developer with no independent regulatory oversight of the traffic management arrangements.

The Club respectfully submits that the Board should require: a revised TTA incorporating Golf Links Road and the R445/Golf Links Road junction based on peak-season traffic counts; a detailed Traffic Management Plan for all off-site sewer and infrastructure upgrade works; a prohibition on disruptive road works on the R445 and Monaleen Road on weekend mornings between 7am and 12 noon and on any designated Club competition day; and an obligation to maintain safe and unimpeded vehicular access to Golf Links Road at all times throughout the construction programme.

11. Broader Grounds: Issues Beyond the Golf Club Interface

The following independent grounds arise from a review of the full application documentation. They do not concern the Golf Club's immediate adjacency to the site but represent areas where the decision under appeal is legally vulnerable, including grounds on which Irish courts have previously quashed planning permissions on judicial review.

11.1 Adequacy of Appropriate Assessment: Groundwater Pathway to Lower River Shannon SAC

The Natura Impact Statement (NIS) confirms that the proposed development site lies approximately 900 metres from the Lower River Shannon Special Area of Conservation (SAC, Code 002165) and 4.7 kilometres from the River Shannon and River Fergus Estuaries Special Protection Area (SPA, Code 004077). The NIS acknowledges that potential likely significant effects may negatively affect the Lower River Shannon SAC via a groundwater pathway.

Of critical concern is the combination of two facts disclosed in the application documents. First, the Civil Engineering Report confirms that the site has extreme groundwater vulnerability in

significant portions of its area, owing to shallow bedrock at or very close to the surface and gravelly subsoils offering limited protection. Excavation works, including the single-level basement excavation for Apartment Blocks 6 to 9, have the potential to intercept existing fractures and create direct migration routes to the underlying aquifer. Second, the NIS itself acknowledges that significant impacts are anticipated via this groundwater pathway, which is precisely why the application was required to progress to Stage 2 Appropriate Assessment.

The standard of proof applicable to an Appropriate Assessment is exacting. Under Article 6(3) of the Habitats Directive, as interpreted by the Court of Justice of the European Union in *Waddenzee* (C-127/02, 2004) and applied consistently by the Irish High Court and An Coimisiún Pleanála, a competent authority may only agree to a plan or project after having ascertained beyond reasonable scientific doubt that it will not adversely affect the integrity of the Natura 2000 site. The CJEU rulings in *People over Wind*, *Peter Sweetman v Coillte Teoranta* (C-323/17, 2018) and *Holohan v An Bord Pleanála* (C-461/17, 2018) further refined this standard. The Board is respectfully requested to satisfy itself that the NIS and its AA conclusion meet this standard given the groundwater vulnerability conditions documented in the application's own engineering reports.

11.2 The 900mm Surface Water Trunk Drain: Unassessed Downstream Impacts

The CEMP discloses an existing approximately 900mm diameter surface water pipeline and trunk drain, owned by Limerick City and County Council, which traverses the site in a broadly west to east alignment. The CEMP states that diversions of this pipeline may be required. The diversion of a 900mm diameter trunk drain is a major civil engineering undertaking with potentially significant downstream consequences. Any change in alignment, gradient, flow regime, or outfall location could affect water levels, drainage rates, and flood risk in adjacent lands including the Golf Club's course.

The EIAR does not assess the potential diversion of this trunk drain at all. Chapter 10 (Water and Hydrology) makes no reference to it, its downstream consequences, or its interaction with the golf course drainage system. This is a material omission from an environmental assessment required under Schedule 6 of the Planning and Development Regulations 2001 (as amended).

11.4 Uisce Éireann Strategic Watermain Infrastructure Traversing the Site

The CEMP further discloses that the development site contains Uisce Éireann water supply assets of significant diameter: a 250mm and a 1000mm diameter watermain entering the site from the south; and a 900mm diameter watermain traversing the lands in a north-easterly direction. The 1000mm watermain is a strategic water supply asset of national significance.

The EIAR and planner's report do not address: whether wayleave corridors must be maintained above these assets permanently; whether the proposed building layout respects the required stand-off distances; whether the basement excavation for Blocks 6 to 9 is compatible with the proximity of these assets; or whether deep excavation in the vicinity of a 1000mm water supply main presents an acceptable risk to the public water supply. The Board should require confirmation from Uisce Éireann that the development as proposed is compatible with the continued safe operation and maintenance of these assets.

11.4 Consistency of Application Documentation and Unit Count Discrepancy

The Club notes a discrepancy between the apartment unit count stated in the planning application (309 apartment units) and the figure stated in the CEMP prepared by Garland Consulting Engineers (308 apartment units). While this discrepancy of one unit may appear minor, it raises a question about the consistency of the application documentation, which may be relevant to the enforceability of the permission as granted. The Board is requested to note this inconsistency and to satisfy itself that the permission as granted is sufficiently precise in its description of the permitted development.

12. Conclusion

Castletroy Golf Club respectfully requests that An Coimisiún Pleanála uphold this appeal and refuse planning permission for the development at Monaleen Road, Castletroy (Planning Reference 26/60241).

The planning authority has failed to have proper regard to the Limerick City and County Development Plan as required under Section 34(2)(a) of the Planning and Development Act 2000 (as amended). It failed to apply Objective SCS1 O20, which expressly requires the protection, retention and enhancement of existing sports grounds. It failed to require an adequate ball-strike risk assessment in circumstances where a professionally prepared safety

analysis was submitted identifying a clear hazard. It failed to apply the agent of change principle. It failed to require a noise impact assessment of the Club's maintenance operations that commence at 6am daily. It failed to maintain the 30-metre buffer zone that has applied to previous permissions on this very site. It failed to assess the cumulative impact of this development alongside the already-permitted development at 25/60271 and failed to apply the Board's own decision in that case consistently. It failed to require a boundary treatment scheme adequate to protect the safety of future residents. And the Environmental Impact Assessment Report is deficient across multiple chapters, having failed to identify Castletroy Golf Club as a sensitive receptor for dust, noise or vibration; failed to assess or quantify the muck shift and HGV movements arising from a 9.7-hectare site with basement excavation; failed to acknowledge that 10 years of construction cannot be characterised as a short-term impact; and failed to assess the drainage, light pollution, visual intrusion or commercial impacts on the Club arising from the proposed development.

The result is a decision that places future residents within a documented hazard zone, exposes a long-established community sporting facility to liability it cannot control, abandons a buffer zone that previous permissions maintained, and rests on an EIAR that systematically excluded the Golf Club from its sensitive receptor assessments. It is contrary to the proper planning and sustainable development of the area.

Should An Coimisiún Pleanála decide not to refuse permission outright, the Club urges the Board to impose the full suite of conditions set out in Section 9 of this appeal, and specifically to require: protective netting to a minimum height of 20 metres; reinstatement of the 30-metre buffer zone; a full ball-strike risk assessment; a noise impact assessment; and a revised construction traffic management plan. Without these measures, the development as approved is unsafe, unsustainable, and contrary to the proper planning and sustainable development of the area.

Report Compiled By:

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On behalf of:

Castletroy Golf Club, Kilbane, Golf Links Road, Castletroy, Limerick.

Appendix A: Golf Safety Impact Assessment

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CASTLETROY GOLF CLUB

APRIL 2026

NOTES ON SUBMISSION TO LIMERICK CITY & COUNTY COUNCIL

A safety assessment has been undertaken in respect of the proposed development by Columbia Estates Management (IE) Limited, comprising 523 residential units and associated infrastructure, as outlined in the submitted planning application.

As part of this assessment, a safety cone analysis has been carried out to evaluate the potential trajectory and dispersion of golf balls from adjacent play areas within Castletroy Golf Club. This form of assessment is a recognised and appropriate methodology for identifying potential risk zones where errant golf shots may travel beyond the confines of the golf course and into adjoining lands.

The attached cone overlay demonstrates that the proposed development lies within the potential strike range of golf balls from two existing holes, namely Hole 1 and Hole 2. The analysis highlights a credible risk to property, vehicles, and personal safety should mitigation measures not be implemented. On this basis, it is considered necessary that appropriate safety conditions be attached to any grant of planning permission.



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Hole 1

The safety cone assessment indicates that there is a risk of golf balls exiting the course during second shots played towards the green on Hole 1. Based on typical play, a second shot is generally taken from approximately 200 metres from the tee. A trajectory cone has been applied to this strike zone to model the dispersion of both standard and errant shots.

The results show that mis-hit or wayward shots have the potential to travel beyond the eastern boundary of the course and into the proposed development site, specifically impacting Block 1. This presents a tangible risk of property damage and potential injury to future residents.

Recommended Mitigation:

Installation by the Developer of protective netting along the eastern boundary of the golf course. This should consist of approximately 30 metres in length at a height of 30 metres. This measure will significantly reduce the likelihood of golf balls escaping the course and striking Block 1.

Hole 2

Similarly, the safety cone assessment for Hole 2 demonstrates that golf balls may escape the course boundary along sections of the northern boundary. The dispersion pattern indicates a risk to areas within the proposed development, including parking areas, internal roadways, and residential units (specifically Houses 20 to 23). Given the alignment and typical play of this hole, errant shots may occur from multiple positions along the fairway, increasing the extent of the risk zone.

Recommended Mitigation:

- Imposition of a 30-metre buffer zone requirement within the Developer's land area running the full span of Hole 2 (approximately 300 metres in length) as provided for in the last grant of planning permission by Limerick County Council in respect of a proposed new housing development on this site.
- Installation of a continuous length of protective netting along the northern boundary of approximately 300 metres in length and at a height of 30 metres. This measure will mitigate the risk of golf balls entering the development and will help safeguard residents, vehicles, and property.

Conclusion

The safety cone assessment undertaken for Holes 1 and 2 of Castletroy Golf Club clearly demonstrates that, in the absence of appropriate mitigation, there is a foreseeable and material risk of golf balls entering the proposed residential development. The analysis identifies specific areas within the development site that fall within the potential strike range of errant shots, giving rise to credible risks to personal safety, property and vehicles.

The application of safety cone modelling represents a recognised, evidence-based and industry-accepted methodology for assessing ball strike dispersion and identifying zones of potential impact. As such, it provides a robust technical basis upon which appropriate planning conditions and mitigation measures can be determined.

It is also necessary to have regard to the established and lawful operation of Castletroy Golf Club as a long-standing recreational and sporting facility. In this context, the Agent of Change principle is directly applicable. Where new, more sensitive development is introduced in proximity to an existing lawful use, responsibility for mitigating potential conflict rests with the incoming development. This ensures that established uses are not subject to unreasonable operational restrictions or retrospective mitigation requirements.

In the absence of the mitigation measures identified in this assessment, there is a clear risk of future land-use conflict arising from safety concerns and associated complaints. Such an outcome would place undue pressure on the continued operation of the golf course and would be contrary to the proper application of the Agent of Change principle.

Accordingly, it is considered both reasonable and necessary that the mitigation measures identified in this assessment, including the provision of protective netting and the reinstatement of an appropriate buffer zone, be secured by condition as part of any grant of planning permission. These measures represent a proportionate and effective response to identified safety risks and will ensure that the proposed development can proceed without compromising public safety or the continued operation of Castletroy Golf Club.



Pleandil, Oldbreacht agus Corn Ryder
Comhairle Cathrach agus Contae Luimnigh
Bothar Thuair an Daill
Tuar an Daill
Luimneach V94 WV78

Planning, Heritage and Ryder Cup
Limerick City and County Council
Dooradoyle Road
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07/04/2026

Castletroy Golf Club
C/o AK Planning & Development Ltd
Millside
Mill Road
Corbally
Limerick

Applicant: Columbia Estates Management (IE) Limited

Reference: 26/ 60241

Development: PERMISSION for a 10 year permission for a Large-scale Residential development on these lands at Monaleen Road, Castletroy, Limerick. The development will consist of the provision of a total of 523no. residential units along with the provision of a creche. Particulars of the development comprise as follows: (a) Site excavation works to facilitate the proposed development to include excavation and general site preparation works. (b) The provision of a total of 214no. 2-3 storey residential dwellings which will consist of 10no. 2 bed units and 204no. 3 bed units. (c) The provision of a total of 309no. apartments units consisting of 159no.1 bed units, 141no.2bed units and 9no. 3bed units to be provided within 10no. apartment buildings. Apartment buildings 1, 2, 3, 4, 5, 8, 9 and 10 are 5 storeys in height and apartment buildings 6 and 7 are part 4 to part 5 storeys in height. (d) Provision of a creche at ground level in apartment building no. 10 and associated outdoor play space along with bin and bicycle storage. (e) Provision of associated car parking at surface level via a combination of in-curtilage parking for dwellings and via on-street parking for the creche and apartments. (f) Provision of a basement for apartment blocks 6-9 which incorporates parking, plant area, storage rooms and bicycle storage. (g)Provision of electric vehicle charge points with associated site infrastructure ducting to provide charge points for residents throughout the site. (h) Provision of associated bicycle storage facilities at surface level throughout the site. (i) Provision of associated open space areas, residential communal open space areas to include formal play areas along with all hard and soft landscape works for private gardens and amenity spaces along with public lighting, planting and boundary treatments to include boundary walls, railings & fencing. (j) Provision of an entrance and associated upgrade works from the Monaleen road for vehicles and pedestrians with a separate pedestrian access provided from the Dublin Road. (k) Provision of associated ESB substations. (l) Provision of ancillary site development/construction works to facilitate foul, water and service networks for connection to the existing foul, water and ESB networks to include for provision of a wastewater pumping station within the site and provision of a new wastewater connection along Monaleen Road. An

■ customerservices@limerick.ie
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■ 061 - 556 000

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 at Lands at Monaleen Road Castletroy Limerick

Dear Sir/Madam,

I wish to acknowledge receipt of your observation or submission on 02/04/2026 in connection with the above planning application and would like to inform you that the points raised by you will be borne in mind when a decision is being made on this application.

The prescribed fee of €20 has been paid and you will be notified of the Council's decision in due course.

Your submission will form part of the documentation available for inspection by the public.

Keep this document safely, you will be required to produce this acknowledgement to An Coimisiún Pleanála if you wish to appeal the decision of the Planning Authority. It is the only form of evidence which will be accepted by An Coimisiún Pleanála that a submission or observation has been made to the Planning Authority on the planning application.

Yours faithfully,



**(for) Senior Planner,
Planning, Heritage & Ryder Cup**