

# Validation Checklist

Lodgement Number : **LDG-088016-26**  
Case Number: **ACP-324286-26**  
Customer: **Gerard Boland and others**  
Lodgement Date: **22/05/2026 09:30:00**  
Validation Officer: **Dáire Littleton Caden**  
PA Name: **Limerick City and County Council**  
PA Reg Ref: **2660241**  
Case Type: **Appeal - LRD**  
Lodgement Type: **Appeal - LRD**



| 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                 |

LRD- Multiple

LRD01M

LRD06

Run at: 25/05/2026 10:03

Run by: Dáire Littleton Caden



Lodgement Cover Sheet - LDG-088016-26

LRD

Details

|                                  |                                   |
|----------------------------------|-----------------------------------|
| Lodgement Date                   | 22/05/2026                        |
| Customer                         | Gerard Boland                     |
| Lodgement Channel                | Post                              |
| Lodgement by Agent               | Yes                               |
| Agent Name                       | Andrew Hersey Planning Consultant |
| 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          |        |

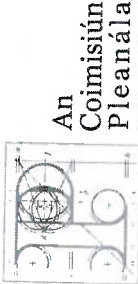
28/04/26

L/D 28/05/26

Appeal

Run at: 22/05/2026 09:36

Run by: Kwabena Anno-Asante



|                                 |                     |
|---------------------------------|---------------------|
| Lodgement ID                    | LDG-088016-26       |
| 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-069980-26 |
| Related Payment Details Record | PD-069809-26  |

LRD 01M

LRD 06

ACP 324286-26

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

|              |  |
|--------------|--|
| Appeals Type |  |
|--------------|--|

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The Secretary

An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

DO1 V902

Date: 20th May 2026

|                       |                |
|-----------------------|----------------|
| AN COIMISIÚN PLEANÁLA |                |
| LDG-                  | 088016 - 26    |
| ACP-                  |                |
| 22 MAY 2026           |                |
| Fee: €                | 720 Type: PM10 |
| Time:                 | 9:15 By: Post  |

**Re: Third Party Appeal against the decision of Limerick City and County Council who granted permission to Columbia Estates Management (IE) Limited under Planning Reg. Ref. 2660241 for 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 Environmental Impact Assessment Report (EIAR) and a Natura Impact Statement (NIS) have been prepared in respect of the proposed development and accompany this application.

**at Lands at Monaleen Road, Castletroy, Limerick**

**This appeal is prepared by Andrew Hersey Planning on behalf of Gerard Boland of Newcastle, Castletroy, Limerick V94 AV2P and on behalf of the Monaleen Residents**

1.1 I, Andrew Hersey Planning Consultant, am acting on behalf of my client Gerard Boland of Newcastle, Castletroy, Limerick V94 AV2P and on behalf of the Monaleen Residents who comprise of the following residents:

- Anne Kerin – Corcomroe, Monaleen Road, Castletroy, Limerick
- Don & Elaine O'Malley – Sunning Hill, Monaleen Road, Castletroy, Limerick
- Charles & Ann O'Malley – Cooleen, Monaleen Road, Castletroy, Limerick
- Frank & Niamh Malone – Rowlands, Dublin Road, Castletroy, Limerick
- Paul & Sheena Gibson – Tulgargan Lodge, Castletroy, Limerick
- John and Mary Quinn – St Annes, Monaleen Road, Castletroy, Limerick
- Catrina Mularkey – Bellair, Dublin Road, Castletroy, Limerick
- Padraic & Clodagh Meade-McMahon – Tinnakilly, Monaleen Road, Castletroy, Limerick

1.2 My clients and their families reside in the immediate vicinity of the proposed development site along the Monaleen Road and Dublin Road. They have lived in the area for considerable periods and have long benefited from the residential amenities, established character and quiet environment associated with the locality

1.3 My clients continue to have serious concerns regarding the scale, intensity and cumulative impacts of the now-permitted development at Monaleen Road comprising 523 residential units. While the grant of permission is acknowledged, the approved development represents a substantial increase in residential population and development intensity which, in their view, is



excessive having regard to the existing infrastructure framework and established suburban character of Castletroy.

- 1.4 My clients consider that the cumulative impact of ongoing and recently permitted development within the area has placed increasing pressure on existing infrastructure and local services. In particular, concerns arise regarding the capacity of the local road network, traffic congestion, school places, healthcare provision, recreational facilities, pedestrian and cycling infrastructure, and the broader range of community services required to support a growing population.
- 1.5 The proposal must be considered in the context of cumulative development pressure in the area. Recent and proposed developments in Castletroy include multiple large-scale housing schemes, including a separate proposal for over 200 additional units and other residential schemes in the vicinity. Additionally, over 800 houses have been constructed or are under construction in the area. Furthermore, planning permission has recently been granted for an additional 114 units at Mount Green, and which site adjoins the Monaleen Road site to the south. This indicates a rapid and ongoing intensification of residential use in an area where services are already under strain.
- 1.6 It is considered that large-scale residential development should be accompanied by the timely delivery of the supporting infrastructure necessary to sustain and integrate such growth. In the absence of adequate supporting investment and service provision, there is concern that development of this scale has the potential to place further strain on already constrained resources and adversely impact upon the quality of life and residential amenities enjoyed by existing residents in the area.
- 1.7 My clients are therefore concerned that the proposed development may represent an over-intensive form of development which has not adequately demonstrated that the existing and planned infrastructure framework within Castletroy can satisfactorily accommodate the scale of growth proposed.
- 1.8 Castletroy, while a growing suburban area, has a limited number of primary and secondary schools, a single district shopping centre, and constrained local road infrastructure relative to the scale of growth now proposed. The addition of 523 units, potentially accommodating over 1,500–2,000 residents, would place significant additional pressure on these existing services, including schools, healthcare, childcare, recreational facilities, and local transport networks.



- 1.9 In particular, the proposal does not sufficiently demonstrate that capacity exists in local services such as schools, childcare facilities, and community infrastructure to accommodate the population arising from such a large-scale development. The inclusion of a single crèche facility within the development is insufficient to mitigate the broader demand generated.
- 1.10 Furthermore, the scale of the proposed development is disproportionate to the established character and servicing capacity of the area. The development would effectively constitute a substantial expansion of the local population without the commensurate delivery of supporting infrastructure, contrary to the principles of proper planning and sustainable development.
- 1.11 The proposed inclusion of 5-storey apartment blocks represents a form of development that is visually and materially out of scale with the established character of the surrounding area. Castletroy is predominantly characterised by low-rise residential development, typically comprising two-storey houses and very occasionally three-storey elements. The introduction of buildings of up to five storeys constitutes a significant and abrupt departure from this prevailing pattern. Monaleen Road is predominantly categorised by two-storey detached houses.
- 1.12 While my clients raised these concerns in submissions to the Planning Authority during the assessment process, they consider that the matters raised were not adequately addressed or afforded sufficient weight in the determination of the application. Consequently, my clients remain dissatisfied that the substantive issues identified in their observations have not been satisfactorily resolved. In light of this, and having regard to the potential impacts arising from the proposed development, my clients feel they have no alternative but to appeal the decision to grant permission on the following grounds:
- Overdevelopment and Inadequate Provision of Local Services and Infrastructure
  - Inadequate Social Infrastructure Assessment
  - Massing, Scale and Visual Impact
  - Excessive Density and Intensity of Development
  - Traffic Generation, Road Safety and Transportation Impacts
  - Other Issues

## **2.0 Context**

### **2.1 Site Context**



- 2.1.1 The subject site is located in the eastern periphery of Limerick City in the established suburb off Castletroy. The site comprises of a vacant greenfield plot of land of some 9.84ha. The area is very much an edge of city location and comprising of low and medium density detached and semi-detached houses.
- 2.1.2 Castletroy Golf Course is located directly to the south of the proposed development site. There is a water treatment plant and reservoir located to the west of the site.
- 2.1.3 The Monaleen Road, located to the east of the subject site, is proposed to serve as the principal access route to the development.. Footpaths become constrained and narrow in places, particularly in the vicinity of the junction with the Dublin Road, which may give rise to concerns in terms of pedestrian comfort and safety.
- 2.1.4 My clients residences are located, for the most part directly adjacent to the proposed development site.

## **2.2 Relevant Planning History**

- 2.2.1 The subject site has been subject to a number of planning applications the most relevant being as follows:
- 2.2.2 Planning Reg. Ref. 09/957 granted permission by Limerick City Council for circa 300 housing units on site comprising of houses, apartments and duplexes.
- 2.2.3 Permission was granted for an Extension of Duration to the above under Planning Reg. Ref. 117018. This permission was never enacted and is now expired.

## **2.3 Policy Context**

### **2.3.1 Limerick Development Plan 2022-2028**

- 2.3.1.1 The Limerick Development Plan 2022-2028 is the principle statutory plan in force at present;
- 2.3.1.2 The site is zoned R1 in the statutory plan the objective being to;



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

and the purpose of the zoning provision is that the;

*Design should be complimentary to the surroundings and should not adversely impact on the amenity of adjoining residents.*

2.3.1.3 The site is designated as Site No 57 in Volume 2(a) of the plan<sup>1</sup> and which allocates a density of 35+/45+ units/ha and estimates a residential yield of 508 units on the basis of a 12.36ha site

2.3.1.4 The subject lands as a Tier 1 site within the Limerick Development Plan 2022–2028 Settlement Capacity Audit. Tier 1 lands are generally identified as lands which are considered serviced or serviceable within the lifetime of the Development Plan and which are capable, in principle, of accommodating development.

### **2.3.2 Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2022)**

2.3.2.1 The guidelines set out national policy on how residential development should be planned and designed in Ireland. These Guidelines replace the older Sustainable Residential Developments in Urban Areas Guidelines and aim to support sustainable, compact, context-sensitive housing across a range of settlement types.

## **3.0 Appeal**

### **3.1 Grounds of Appeal**

3.1.1. My clients wish to appeal the proposed development on the following grounds:

- Overdevelopment and Inadequate Provision of Local Services and Infrastructure
- Inadequate Social Infrastructure Assessment
- Massing, Scale and Visual Impact
- Excessive Density and Intensity of Development
- Traffic Generation, Road Safety and Transportation Impacts

<sup>1</sup> Page 12 Table 1 of Volume 2(a) of the Limerick County Development Plan 2022-2028



- Other Issues

### **3.1.2 Overdevelopment and Inadequate Provision of Local Services and Infrastructure**

- 3.1.2.1 The proposed development of 523 residential units would facilitate a substantial population increase in the order of approximately 1,500–2,000 additional residents within the Castletroy area. This represents a significant increase in population arising from a single development proposal and must be assessed not merely in terms of numerical growth but in the context of the capacity of the receiving environment to accommodate such expansion.
- 3.1.2.2 Since approximately 2018, the wider Castletroy and Monaleen area has experienced very significant residential growth, with in excess of 1150 units completed, under construction or permitted within the immediate catchment area. When recently permitted and further proposed schemes are considered, the cumulative residential pipeline rises substantially in excess of 1,500 residential units, representing a very significant increase in population and associated infrastructure demand.
- 3.1.2.3 It is evident that concerns regarding the adequacy of social and community infrastructure within Castletroy are not isolated or confined to individual residents. Recent public engagement initiatives and locally circulated material have highlighted growing concerns regarding the relationship between significant residential expansion and the timely delivery of supporting infrastructure and services.<sup>2</sup> Particular concerns have been raised regarding community facilities, transport links, road capacity, pedestrian safety and wider public amenities.
- 3.1.2.4 The Limerick Development Plan 2022–2028, together with the Limerick Shannon Metropolitan Area Transport Strategy (LSMATS), promotes a clear principle of infrastructure-led and plan-led growth, whereby population expansion should occur in tandem with the delivery of transportation infrastructure, social facilities and community services.
- 3.1.2.5 While both the Applicant's Planning Statement and the Planning Authority's assessment place significant reliance upon broad compact growth policy objectives, the site's Tier 1 serviced status and strategic growth considerations, comparatively limited consideration appears to have been given to whether the cumulative scale and intensity of development proposed results in a form of overdevelopment having regard to the capacity of the receiving environment. While Tier 1 status

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<sup>2</sup> see attached flyer



establishes that development of the lands may be acceptable in principle, it does not in itself determine the appropriateness of the scale, density or intensity of development proposed.

- 3.1.2.6 In particular, neither the applicant's Planning Statement nor the Case Planner's Report appears to directly assess whether the quantum of development proposed, when considered cumulatively with recently completed, permitted and proposed schemes throughout Castletroy, can be accommodated without giving rise to significant pressure upon transportation networks, educational facilities, childcare provision, community infrastructure and wider public services.
- 3.1.2.7 While the Planning Authority concludes that the proposal aligns with the Development Plan by virtue of density provisions and Tier 1 status, there appears to be limited examination of whether the resulting population increase itself represents an excessive form of intensification within the context of the wider suburban area.
- 3.1.2.8 While the applicant avoids any reference to overdevelopment, the EIAR and Planning Statement repeatedly emphasise efficient land utilisation, compact growth and optimisation of site yield. The documentation suggests a scheme-led approach whereby density objectives have driven building height, layout and quantum rather than these elements emerging from a contextual and infrastructure-led assessment. The resulting development represents an excessive intensification of the site that exceeds the scale originally envisaged under the Settlement Capacity Audit and gives rise to a pattern of overdevelopment and over-intensification having regard to the receiving suburban environment, surrounding residential amenities and infrastructure capacity
- 3.1.2.9 This omission is particularly significant as overdevelopment is not solely a function of site density but also concerns the relationship between development scale and the capacity of supporting infrastructure. The issue is therefore not simply whether residential development is acceptable in principle, but whether the receiving environment can sustainably absorb development of this scale without adverse impacts upon quality of life, service provision and residential amenity.
- 3.1.2.10 Concerns have already been identified elsewhere in this appeal regarding primary and post-primary school capacity, childcare provision, transportation limitations, public transport accessibility and cumulative traffic impacts. The Schools, Childcare and Social Infrastructure Assessment accompanying the application does not adequately demonstrate that these facilities possess sufficient capacity to accommodate the scale of population growth proposed.



- 3.1.2.11 The proposal would also generate a substantial increase in travel demand. However, existing public transport infrastructure remains predominantly bus-based and concerns have been raised regarding service capacity, accessibility and reliance upon future improvements not yet delivered.
- 3.1.2.12 Furthermore, the development proposes approximately 743 car parking spaces, a level of provision which itself indicates a continuing reliance upon private vehicle use notwithstanding the aspirations of the Mobility Management Plan. The substantial level of parking proposed undermines assertions that the scheme represents a genuinely sustainable transport model and instead points toward a development likely to remain significantly car dependent in practice.
- 3.1.2.13 Taken cumulatively, the proposal seeks to introduce a population equivalent to a small settlement without a corresponding demonstration that the supporting physical, social and transportation infrastructure framework required under the Development Plan and LSMATS either presently exists or will be delivered in tandem with development.
- 3.1.2.14 Accordingly, concerns arise that the proposal constitutes an excessive form of intensification and overdevelopment which has not been adequately assessed within either the Applicant's Planning Statement or the Planning Authority's report. In these circumstances, it has not been satisfactorily demonstrated that the receiving environment possesses the carrying capacity necessary to accommodate development of this scale without adverse impacts upon infrastructure, mobility, community facilities and the amenities enjoyed by existing and future residents.

### **3.1.3 Social Infrastructure Assessment**

- 3.1.3.1 The submitted 'Schools, Childcare and Social Infrastructure Assessment' submitted with the application estimates that the proposed development will generate approximately 347 school-age children. This represents a significant additional demand for both primary and post-primary educational provision arising from a single residential scheme and raises legitimate concerns regarding the capacity of existing educational infrastructure within the receiving environment.
- 3.1.3.2 While the assessment identifies a range of educational facilities within a broad catchment area, the information presented indicates that a number of local schools possess limited residual capacity, with several operating at or approaching full enrolment. Existing residents have direct experience of capacity constraints, including oversubscription, waiting lists and ongoing difficulties in



securing school places, particularly at primary level. Such lived experiences appear consistent with the capacity pressures identified within the applicant's own assessment and indicate that educational provision within the area is already under strain.

- 3.1.3.3 Concerns also arise regarding the methodology underpinning the assessment. Considerable reliance is placed on Department of Education demographic projections and theoretical capacity assumptions rather than on identified, confirmed and deliverable school capacity at individual locations. The assessment does not identify specific schools with guaranteed available places, nor does it demonstrate that additional classrooms, school extensions or new educational facilities are funded, programmed or capable of delivery within a timeframe aligned with the occupation of the proposed development.
- 3.1.3.4 Particular concern arises in respect of assumptions relating to accessibility. The assessment suggests that travel distances of up to six kilometres may reasonably facilitate access to educational facilities. However, this assumption does not adequately reflect local conditions. There is no school bus service operating along the Monaleen Road corridor and the area is characterised by constrained pedestrian infrastructure, limited cycling provision and significant congestion during peak school periods. In the absence of safe, direct and attractive active travel routes, such travel distances cannot realistically be regarded as practical for younger children and are likely to result in an increased dependence on private car use.
- 3.1.3.5 In practical terms, this creates the potential for a significant increase in school-related vehicular trips, placing further pressure on the Monaleen Road corridor and adjacent junctions which are already subject to congestion and operational constraints. Such outcomes would undermine the sustainable transport objectives of the Development Plan, conflict with the aims of the submitted Mobility Management strategy and run counter to broader national policy objectives relating to climate action and modal shift.
- 3.1.3.6 The assessment also fails to satisfactorily address childcare provision. While a crèche facility forms part of the proposed development, insufficient information has been provided to demonstrate that its scale and capacity are adequate to serve the level of demand arising from a scheme comprising 523 residential units. Furthermore, limited consideration has been given to existing childcare capacity within the wider area. Given the pressures already experienced in



accessing childcare services locally, this omission represents a significant deficiency in the assessment of essential social infrastructure.

- 3.1.3.7 Importantly, insufficient regard has been had to the cumulative effects arising from residential development completed, permitted and under construction within the wider Castletroy and Monaleen Road area. Since approximately 2018, substantial residential growth has either occurred or is underway within the immediate catchment area, including Castlebrook (159 units), Newtown Meadows (149 units), Newtown Avenue (89 units), Newtown Manor (180 units), The Mills (224 units), Caislean Nua (114 units permitted)..Bloomfield (243 units completed. Collectively these developments are likely to accommodate a substantial additional residential population. When considered alongside the proposed 523-unit scheme, the cumulative demand arising in respect of school places, childcare provision, transportation infrastructure and wider community services becomes significant.
- 3.1.3.8 The absence of a coordinated and plan-led approach to the delivery of education and childcare infrastructure across these developments highlights broader concerns regarding sequencing and infrastructure delivery. Large-scale residential development appears to be proceeding in advance of clearly identified and deliverable social infrastructure capacity. The assessment does not demonstrate how the combined educational demand generated by these schemes can be accommodated within existing or planned facilities, nor does it address the cumulative impacts arising from increased school-related travel demand.
- 3.1.3.9 The *Sustainable Residential Development and Compact Growth Guidelines* issued under Section 28 of the Planning and Development Act, emphasise that higher-density residential development should be supported by the timely provision of appropriate social and community infrastructure, including schools and childcare facilities. In this instance, the proposal would generate substantial additional demand on educational and childcare infrastructure without adequately demonstrating how such demand can be accommodated in a coordinated, plan-led or deliverable manner.
- 3.1.3.10 Recent decisions of An Coimisiún Pleanála increasingly recognise deficits in educational and social infrastructure as material planning considerations, particularly where substantial residential development is proposed in advance of confirmed service capacity. In this case, the absence of guaranteed school places, the reliance on extended travel distances and the cumulative transport



and sustainability impacts identified give rise to serious concerns regarding the appropriateness of the proposal.

- 3.1.3.11 Taken as a whole, the information submitted does not adequately demonstrate that sufficient educational and childcare infrastructure either exists or will be delivered to support the population generated by the proposed development, whether considered individually or cumulatively with other permitted and proposed developments within the area. This represents a significant shortcoming in the planning rationale underpinning the scheme and further reinforces concerns that the scale and intensity of development proposed exceeds the carrying capacity of the receiving environment.
- 3.1.3.12 The application documentation does not adequately assess the capacity of existing social infrastructure serving the Monaleen/Castletroy area to absorb the significant population increase arising from the proposed development. While the Planning Statement refers generally to social and community infrastructure objectives and includes provision of a crèche, there is no meaningful assessment of existing or planned capacity in respect of GP services, primary healthcare provision, sports and recreational facilities, swimming pools, gyms, community centres or wider social infrastructure. The proposal for 523 residential units has the potential to generate a substantial resident population and would inevitably place additional pressure on already constrained local facilities. The omission of a detailed social infrastructure audit raises concerns that the proposal represents a premature and excessive intensification of development at this location, contrary to the principle that residential development should occur in tandem with the provision of adequate social and physical infrastructure
- 3.1.3.13 Accordingly, the documentation submitted has not demonstrated, on the balance of probabilities, that the physical, social and community infrastructure necessary to support the population arising from the proposed development can be delivered in a coordinated, timely and plan-led manner. The cumulative effect of substantial residential growth already experienced within Castletroy, when combined with the scale of development now proposed, gives rise to a reasonable concern that the proposal would place undue pressure on already constrained services and facilities. The proposal therefore exhibits characteristics of overdevelopment and over-intensification and has not adequately demonstrated that the receiving environment possesses sufficient carrying capacity to accommodate development of this scale without adverse impacts upon existing and future residents



#### **3.1.4 Density**

- 3.1.4.1 A total of 523 residential units are proposed on a site area of approximately 9.84 hectares, yielding an overall development density of approximately 53.9 units per hectare. While this density figure falls numerically within the broad range contemplated under national compact growth policy, density cannot be considered in isolation and must instead be assessed having regard to the manner in which it is achieved, the characteristics of the receiving environment, infrastructure capacity and impacts upon residential amenity.
- 3.1.4.2 The subject lands form part of Site No. 57 identified within Volume 2(a) of the Limerick Development Plan 2022–2028, which identifies indicative density ranges of 35+ units per hectare and 45+ units per hectare across different portions of the lands. The Settlement Capacity Audit identifies an anticipated residential yield of approximately 508 units across a wider landholding of approximately 12.36 hectares, equating to an indicative density of approximately 41 units per hectare. While these figures are indicative and not prescriptive, they nevertheless form part of the statutory planning framework and provide an indication of the level of development intensity envisaged through the Development Plan process.
- 3.1.4.3 Applying the approximate density assumptions identified within the Development Plan to the application site area of 9.84 hectares would yield a residential output materially below the 523 units now proposed. (approximately 403 units) Accordingly, the proposal seeks to facilitate a substantially greater level of development intensity than that reasonably envisaged under the statutory framework for these lands.
- 3.1.4.4 The Planning Authority concludes that the proposed density aligns with the Development Plan on the basis that the site forms part of a Tier 1 serviced landholding and exceeds the minimum density thresholds applicable to Density Zones 2 and 3. Similarly, the Applicant's Planning Statement places significant reliance upon national compact growth objectives, the site's Tier 1 status and its proximity to employment, educational facilities and future transport improvements in support of the density proposed.
- 3.1.4.5 However, both assessments appear to proceed on the basis that exceeding minimum density thresholds and satisfying broad strategic growth objectives automatically demonstrates appropriateness. This approach is overly simplistic. Minimum density standards establish lower



thresholds for development intensity and do not in themselves determine whether a proposal is appropriate having regard to local context, infrastructure capacity, urban design considerations and residential amenity impacts.

- 3.1.4.6 The appropriateness of density must be assessed having regard to the carrying capacity of the receiving environment, including transportation infrastructure, community facilities, accessibility, urban form, residential character and cumulative development pressures. In this regard, substantial concerns have already been identified elsewhere in this submission regarding transportation constraints, school capacity, public transport provision, road safety concerns and the cumulative effects of recent and permitted development within the wider Castletroy area.
- 3.1.4.7 The Applicant's Planning Statement repeatedly characterises the proposal as representing a sustainable and compact form of development while also asserting that the proposal responds appropriately to local context. However, these conclusions are generally asserted rather than objectively demonstrated. Comparatively little attention is given to site-specific constraints including Monaleen Road accessibility limitations, reliance upon a single access point, constrained pedestrian and cycling infrastructure and the suburban character of the surrounding area.
- 3.1.4.8 Similarly, while the Planner's Report references a density range of 10–54 units per hectare within surrounding developments, density figures viewed in isolation provide limited assistance. Comparisons between developments require consideration not merely of numerical density but of built form, site configuration, apartment provision, height, landscape setting and infrastructure context. Reliance upon isolated examples at the upper end of a broad density spectrum does not in itself demonstrate that the proposed site-wide density is appropriate.
- 3.1.4.9 The Planning Authority further places reliance on the site's proximity to the proposed BusConnects route along Plassey Road and its inclusion within the *City–Urban Neighbourhoods* category under the Sustainable Residential Development and Compact Settlements Guidelines. However, reliance upon future or aspirational infrastructure cannot in itself justify increased development intensity. National policy promotes plan-led and infrastructure-led growth, and density should not be justified on the basis of future behavioural changes or transport interventions that remain outside the control of the applicant.



- 3.1.4.10 Importantly, the Sustainable Residential Development and Compact Settlements Guidelines support increased density but do not promote density as an objective in itself. The Guidelines recognise that higher-density development can be delivered through a variety of urban forms and are not dependent upon increased building height or concentrated apartment development. In particular, the Guidelines acknowledge the role of high-density, low-rise development typologies, including terraced housing, perimeter block arrangements and own-door housing forms, as mechanisms for achieving compact growth while remaining sensitive to context and residential amenity.
- 3.1.4.11 In this regard, concerns do not arise from the principle of achieving increased density on the site. Rather, concerns arise from the specific development form selected to achieve that density. The proposed residential yield appears heavily reliant upon the concentration of ten apartment blocks, including multiple four- and five-storey structures distributed throughout the development lands. The Site Layout Plan demonstrates that density has been concentrated through substantial apartment clusters and associated massing rather than through a more graduated and context-responsive approach.
- 3.1.4.12 The application documentation does not demonstrate that alternative lower-rise, higher-density development forms were meaningfully explored. Given the scale of the lands and their suburban context, it is not apparent why a more balanced approach incorporating higher-density, lower-rise typologies could not have achieved compact growth objectives while reducing concerns relating to visual dominance, overlooking, building massing and impacts upon adjoining residential properties.
- 3.1.4.13 This issue is particularly significant having regard to neighbouring residential properties. The concentration of apartment blocks and associated development intensity introduces concerns regarding overlooking, increased activity levels, visual dominance and cumulative urbanisation impacts. While numerical separation distances may achieve technical compliance, compliance with minimum standards does not necessarily equate to acceptable planning outcomes where the overall character and experience of adjoining residents is materially altered.
- 3.1.4.14 Taken cumulatively, the principal concern is not density in isolation but rather the manner in which density has been achieved. The documentation suggests that residential yield has become a primary driver of design, with density pursued as an objective in itself rather than emerging from



a contextual, infrastructure-led and design-led process. In these circumstances, it is considered that the proposed density represents an excessive form of intensification which does not adequately respond to the suburban character of the area and gives rise to legitimate concerns regarding residential amenity and the carrying capacity of the receiving environment

### **3.1.5 Scale & Building Height**

- 3.1.5.1 The proposed development incorporates a significant number of apartment buildings ranging between four and five storeys in height, together with associated residential blocks distributed throughout the site. While the applicant and the Planning Authority conclude that the proposed scale responds appropriately to topography, site context and wider compact growth objectives, concerns remain that the overall scale and massing proposed represent an excessive and incongruous form of development having regard to the established low-rise suburban character of the area and the amenities of adjoining residential properties.
- 3.1.5.2 The receiving environment surrounding Monaleen Road and Castletroy is characterised predominantly by a suburban pattern of development comprising one- and two-storey dwellings, generally arranged within lower-rise residential estates and spacious suburban plots. While isolated examples of larger buildings and apartment developments may exist elsewhere within the broader Castletroy area, these do not establish the prevailing grain, scale or character of the immediate receiving environment. The issue is not whether isolated taller structures exist elsewhere within the wider area, but whether the prevailing grain and immediate context support a concentrated form of four- and five-storey apartment development at this location.
- 3.1.5.3 The Applicant's Planning Statement and the Planning Authority's assessment place reliance upon the existence of taller elements within the wider area together with the site's topography and proximity to the Newcastle reservoir structure in support of increased building height. However, the presence of isolated taller structures or infrastructural elements does not in itself establish a planning rationale for the introduction of widespread four- and five-storey residential buildings across the development lands.
- 3.1.5.4 Similarly, while the Planner's Report refers to taller buildings being positioned in response to topography and toward the "core" of the site, the Site Layout Plan demonstrates that substantial



apartment blocks are not confined exclusively to internal focal points but are also concentrated along significant portions of the site including areas adjoining the southern boundary and wider interfaces. Accordingly, concerns arise that the proposed building height strategy extends beyond the creation of occasional landmark elements and instead introduces extensive areas of intensified built form.

- 3.1.5.5 While the *Urban Development and Building Heights Guidelines for Planning Authorities (2018)* recognise that buildings of four and five storeys are not inherently "tall" in planning terms, the Guidelines do not promote increased building height as an objective in itself. Rather, they require that proposals involving increased height be justified having regard to location, accessibility, urban structure, infrastructure capacity, surrounding context and impacts upon residential amenity.
- 3.1.5.6 In this regard, the subject site is located within an established suburban area and is not situated within a city centre, regeneration area, district centre or major transport node typically associated with increased building height strategies. Furthermore, concerns have already been identified elsewhere in this appeal regarding transportation limitations, public transport provision, road network constraints and the wider capacity of local infrastructure. Accordingly, it is not evident that the locational characteristics typically associated with increased building height are present in this instance.
- 3.1.5.7 The Limerick City Building Height Strategy (2022) provides a spatial framework for increased height and focuses primarily upon the City Centre and strategic regeneration locations where taller development can reinforce urban structure and placemaking objectives. The subject lands do not form part of these identified areas. Accordingly, limited justification has been advanced explaining why a suburban site characterised by a low-rise residential context warrants such a significant concentration of four- and five-storey apartment development.
- 3.1.5.8 Concerns arise not solely from individual building heights but from the cumulative impact arising from the concentration of apartment blocks and associated massing throughout the site. The Site Layout Plan indicates ten apartment blocks distributed across the development lands together with associated parking courts, internal roads and communal areas. When considered collectively, this arrangement gives rise to a materially different urban form than that which characterises the surrounding suburban area.



3.1.5.9 The proposed scale also raises concerns regarding impacts upon adjoining residential properties and established residential amenity. While the applicant places reliance upon separation distances and compliance with technical standards, numerical compliance alone does not necessarily equate to acceptable planning outcomes.

3.1.5.10 The cumulative concentration of apartment blocks of increased scale introduces concerns regarding:

- visual dominance and overbearing impacts;
- overlooking and reduced privacy;
- increased activity and intensity of use;
- perception of enclosure;
- skyline prominence;
- broader urbanisation impacts upon adjoining residential areas.

3.1.5.11 These concerns become particularly relevant having regard to the changing topography of the site. The Planner's Report identifies that the lands rise to form a local hill. However, while topography is relied upon as justification for taller buildings, comparatively little assessment appears to have been undertaken regarding how elevated site levels may intensify impacts upon adjoining residential properties.

3.1.5.12 Building impacts cannot be assessed solely by reference to storey count. Apartment buildings positioned on elevated portions of the site may materially increase perceived building height and visual prominence when viewed from adjoining properties. Consequently, the combination of increased building height and changing site levels may intensify overlooking, visual dominance and residential amenity impacts.

3.1.5.13 Furthermore, previous permissions affecting these lands and adjoining areas recognised the sensitivity of particular site interfaces and incorporated substantial separation distances and landscape buffers in order to provide softer transitions to adjoining uses. The current proposal departs from that established approach through the introduction of apartment blocks of materially increased scale and intensity.

3.1.5.14 Importantly, national policy promoting compact growth does not require that increased density be achieved through increased height alone. The *Sustainable Residential Development and Compact Settlements Guidelines* recognise that compact growth objectives may also be achieved through



high-density, low-rise typologies capable of accommodating significant residential development while remaining sensitive to local context and adjoining residential amenity.

3.1.5.15 In this regard, concerns arise not from increased scale in principle, but from the specific development form selected. The application documentation does not demonstrate that alternative lower-rise and more graduated development approaches were meaningfully explored. Given the suburban context of the lands and the established low-rise character of the area, it is not evident why a more context-sensitive form of development could not have achieved compact growth objectives while reducing impacts arising from building massing and residential intensity.

3.1.5.16 Taken cumulatively, the proposed scale and building height strategy appear driven primarily by the objective of maximising residential yield rather than emerging from a contextual and design-led response informed by site characteristics, surrounding development patterns and residential amenity considerations. Accordingly, it is considered that the proposal introduces an excessive and visually intrusive form of development which does not adequately respect the established low-rise suburban character of the area and gives rise to legitimate concerns regarding impacts upon adjoining residential properties and the overall character of the receiving environment

### **3.1.6 Traffic Generation, Road Safety and Transportation Impacts**

#### **3.1.6.1 Access, Traffic, Mobility and Sustainable Transport**

3.1.6.1.1 My clients have serious concerns regarding the adequacy, robustness and overall reliability of the applicant's transportation and mobility strategy. My clients have discussed these matters with a reputable Traffic and Transportation Engineer, who reviewed the applicant's Traffic and Transport Assessment, Mobility Management Plan, Road Safety Audit, Designer Response and supporting design documentation. Following this review, it is considered that significant shortcomings remain in the assessment of traffic impacts, sustainable transport provision, internal movement, network resilience and road safety matters.

3.1.6.1.2 Collectively, the submitted documentation raises serious concerns as to whether the transportation impacts associated with a development of this scale have been fully and appropriately assessed.

#### **3.1.6.2 Car Dependency and Mobility Strategy**



3.1.6.2.1 The applicant places significant reliance on the submitted Mobility Management Plan to justify the proposed density, reduced parking provision and overall scale of development. However, the documentation itself confirms a predominantly car-based baseline travel pattern, with approximately 47–48% of trips undertaken by private car. This reflects the existing transport reality of the area and demonstrates continued reliance on private vehicle use rather than any meaningful transition toward sustainable modes.

3.1.6.2.2 While the Mobility Management Plan establishes modal shift targets, these are expressly aspirational in nature and are dependent upon future behavioural changes and infrastructure delivery largely outside the control of the applicant. No clear commitments, funding arrangements or implementation timelines are identified in respect of the infrastructure required to support the level of modal shift assumed.

3.1.6.2.3 Accordingly, the Mobility Management Plan does not provide a sufficiently robust evidential basis upon which to justify either the density or scale of development proposed.

### 3.1.6.3 *Public Transport Deficiencies*

3.1.6.3.1 Contrary to the suggestion that the site is well served by sustainable transport infrastructure, there is no bus service operating directly along Monaleen Road and access to existing services requires walking distances of up to approximately 850 metres along routes which residents describe as constrained and discontinuous.

3.1.6.3.2 The documentation identifies bus routes and service frequencies but does not undertake any meaningful assessment of:

- public transport carrying capacity;
- passenger loading;
- peak-hour demand;
- service resilience;
- cumulative demand generated by surrounding development;
- likely additional demand arising from 523 residential units.



3.1.6.3.3 No dedicated Public Transport Capacity Assessment appears to have been undertaken. The absence of any evidence demonstrating that current or planned services possess adequate capacity represents a significant omission.

*3.1.6.4 Trip Rates and Traffic Generation*

3.1.6.4.1 Concerns also arise regarding the trip generation assumptions adopted within the Traffic and Transport Assessment. Relatively low trip rates appear to have been applied notwithstanding the suburban location of the development and the apparent reliance on private vehicle travel.

3.1.6.4.2 An internal inconsistency emerges within the application documentation. The Mobility Management Plan promotes sustainable travel and reduced car dependency, while elsewhere substantial parking provision is justified on the basis of the suburban nature of the site and ongoing reliance on private vehicle use.

3.1.6.4.3 If the development is sufficiently car dependent to justify extensive parking provision, it remains unclear why comparatively low traffic generation assumptions are considered appropriate.

3.1.6.4.4 As trip generation assumptions underpin all subsequent modelling exercises, any underestimation may materially affect the reliability of junction assessments and wider transport conclusions.

*3.1.6.5 Future Traffic Growth Methodology*

3.1.6.5.1 The methodology used to forecast future traffic growth has not been sufficiently demonstrated. The Traffic and Transport Assessment does not clearly establish compliance with current TII Project Appraisal Guidelines (PE-PAG-02017 Unit 5.3) and insufficient justification appears to have been provided regarding the assumptions adopted. No meaningful phased assessment of occupation or staged delivery scenarios appears to have been undertaken despite the substantial scale of development proposed. Consequently, concerns remain that future traffic impacts may have been understated.

*3.1.6.6 Single Access Strategy and Network Resilience*

3.1.6.6.1 The proposed development relies entirely upon a single vehicular access point onto Monaleen Road through which all residential, visitor, service, emergency and construction traffic must pass.



3.1.6.6.2 This arrangement creates a significant over-reliance upon a single access spine and raises concerns regarding operational resilience, safety and emergency accessibility. DMURS promotes permeability, legibility and multiple route choices as means of enhancing resilience and reducing dependence on single access arrangements. The proposal does not clearly demonstrate how these objectives are achieved. Any obstruction, collision or construction activity occurring at or near the sole access point could materially affect access to the wider development.

#### 3.1.6.7 *Monaleen Road Constraints and Existing Conditions*

3.1.6.7.1 Monaleen Road is characterised by:

- constrained carriageway geometry;
- narrow and discontinuous footpaths;
- absence of dedicated cycle facilities;
- significant school-related and commuter congestion.

3.1.6.7.2 The Traffic and Transport Assessment relies heavily upon theoretical modelling outputs but does not appear to reconcile these with actual network conditions experienced locally.

3.1.6.7.3 Residents regularly experience peak-hour congestion and delay, particularly associated with school activity. However, there appears to be limited evidence of queue validation surveys, observed operational studies or journey time analysis. Theoretical junction modelling alone cannot be relied upon where existing lived conditions suggest a different operational reality.

#### 3.1.6.8 *DMURS Compliance and Vulnerable Road Users*

3.1.6.8.1 The Stage 1/2 Road Safety Audit identified a substantial number of deficiencies relating to:

- crossing visibility;
- pedestrian desire lines;
- disabled access;
- tactile paving;
- cycle access;
- visibility and stopping distances;



- internal movement arrangements;
- refuse strategy;
- vehicle turning.

3.1.6.8.2 The breadth and number of issues identified indicate that substantial redesign was required following audit review. While revised mitigation measures were subsequently introduced, the scale of post-hoc amendments raises concerns regarding whether DMURS principles informed the design process from the outset. Furthermore, no dedicated DMURS Audit, Quality Audit or Vulnerable Road User Assessment appears to have been undertaken.

*3.1.6.9 Refuse and Service Vehicle Operation*

3.1.6.9.1 With respect to refuse vehicles, the applicant subsequently submitted swept-path analysis in response to Road Safety Audit concerns. However, uncertainty remains regarding whether the vehicle selected for assessment accurately reflects refuse vehicles commonly operating within Ireland.

3.1.6.9.2 Vehicle dimensions, axle arrangement and turning characteristics can materially influence manoeuvrability within constrained residential environments. In the absence of clear justification regarding the vehicle selected, uncertainty remains regarding the suitability of internal layouts and turning arrangements.

*3.1.6.10 Climate and Compact Growth Obligations*

3.1.6.10.1 *The Sustainable Residential Development and Compact Growth Guidelines* support increased density where growth is both plan-led and infrastructure-led and where higher density development is supported by high-quality public transport, walkable neighbourhoods and attractive active travel networks.

3.1.6.10.2 In this instance, the proposal appears to rely upon anticipated future behavioural change rather than existing or committed transport infrastructure. This reverses the intended policy sequence.

3.1.6.10.3 From a climate perspective this is significant. Increasingly, An Coimisiún Pleanála has emphasised the need for developments to demonstrate genuine reductions in car dependency rather than reliance upon aspirational modal shift targets.



3.1.6.10.4 Taken cumulatively, the documentation indicates that notwithstanding the aspirations of the Mobility Management Plan, the proposed development is likely to remain fundamentally car dependent for daily travel patterns.

#### **3.1.6.11 Concluding Statement**

3.1.6.11.1 Taken cumulatively, the submitted Traffic and Transport Assessment, Mobility Management Plan, Road Safety Audit and supporting documentation do not satisfactorily demonstrate that the existing transportation network and mobility infrastructure can adequately accommodate a development of this scale and intensity.

3.1.6.11.2 Concerns remain regarding trip generation assumptions, future traffic forecasting, public transport capacity, network resilience, road safety and compliance with DMURS principles and wider sustainable mobility objectives.

3.1.6.11.3 Notwithstanding the aspirations of the Mobility Management Plan, the proposal appears likely to remain fundamentally car-dependent in nature, thereby placing additional pressure on an already constrained transport environment.

3.1.6.11.4 Accordingly, it is considered that the proposed development has not adequately demonstrated that the receiving environment possesses the capacity or infrastructure necessary to support the scale of development proposed and would therefore give rise to unacceptable impacts in terms of traffic operation, road safety and sustainable transport objectives.

### **3.1.7 Other Issues**

#### **3.1.7.1 Boundary Walls**

3.1.7.1.1 The proposed development directly adjoins the rear boundaries of existing residential properties along Monaleen Road, whose occupants currently benefit from a high degree of privacy, security and residential amenity. Given the scale and intensity of the proposed development, together with the substantial increase in population and activity levels associated with 523 residential units, the provision of an appropriate and robust boundary treatment assumes particular importance.

3.1.7.1.2 The application proposes a Type G boundary treatment comprising concrete posts and concrete plank fencing. Residents have raised significant concerns regarding the appropriateness of this



form of treatment having regard to its durability, effectiveness and ability to provide an appropriate degree of privacy and security in the context of a large-scale residential development of this intensity.

- 3.1.7.1.3 Concerns arise that the proposed boundary treatment represents a relatively lightweight form of enclosure which may not provide an adequate long-term response where existing dwellings interface with a development containing multiple four- and five-storey apartment buildings, extensive pedestrian movement and significantly increased levels of activity. In these circumstances, boundary treatments must perform a range of functions including visual screening, privacy protection, noise attenuation, security and resistance to long-term wear and damage.
- 3.1.7.1.4 This issue is particularly relevant having regard to the relationship between existing residential properties and the proposed layout. The application includes a pocket park/play area located in close proximity to the rear and side boundaries of existing dwellings. The Development Management Standards contained within the Limerick City & County Development Plan 2022–2028 emphasise the importance of protecting residential privacy and generally discourage the location of play areas directly adjoining the side or rear boundaries of existing private dwellings.
- 3.1.7.1.5 The proposed arrangement gives rise to concerns regarding increased activity levels, noise generation, overlooking and general disturbance in close proximity to established residential properties. Such impacts become more significant where the adequacy and effectiveness of the proposed boundary treatment itself remain in question.
- 3.1.7.1.6 It is acknowledged that the grant of permission includes a condition requiring the provision of 2.0 metre high boundary walls along certain interfaces. While this amendment is welcomed, it remains a matter of concern that such measures have been introduced by condition rather than forming an integral part of the design approach from the outset. Questions therefore remain as to whether the boundary specification proposed provides a sufficiently robust and enduring response having regard to the scale and intensity of development proposed and the need to adequately protect the amenities of adjoining residential properties
- 3.1.7.1.7 Residents have consistently sought the provision of a more substantial and permanent boundary treatment comprising a solid concrete blockwork wall with a minimum height of 2.4 metres, finished with pointed blockwork and precast concrete capping. This request does not arise in isolation. Earlier permissions and agreements relating to these lands recognised the sensitivity of

(

interfaces with adjoining residential properties and incorporated more robust boundary treatments, including approximately 2.4 metre high solid blockwork walls, specifically intended to safeguard privacy, security and residential amenity.

- 3.1.7.1.8 Particular concern also arises regarding the treatment proposed along the north-western boundary, where a post-and-rail fence with wire mesh backing is proposed. Such a treatment appears inadequate in the context of a development of this scale and intensity and provides limited protection against unauthorised access, trespass and long-term boundary integrity concerns. It is understood that previous agreements relating to this boundary provided for a substantially more robust wall treatment and no adequate planning justification has been advanced explaining the departure from that previously accepted standard.
- 3.1.7.1.9 The proposed reliance upon lightweight fencing and post-and-panel systems therefore appears to represent a downgrading of boundary protection compared with standards previously accepted and implemented on these lands. Given the scale of development now proposed and the close relationship with existing residential properties, boundary treatments should provide a durable and effective long-term response capable of safeguarding privacy, screening adjoining properties, preventing unauthorised access and maintaining residential amenity over the lifetime of the development.
- 3.1.7.1.10 Accordingly, notwithstanding the inclusion of a condition requiring 2.0 metre high boundary walls, concerns remain that the proposed boundary treatment does not adequately respond to the scale, intensity and amenity sensitivities associated with the development and may not provide an equivalent level of protection to that previously recognised as necessary along sensitive residential interfaces.

### *3.1.7.2 Overshadowing Impacts*

- 3.1.7.2.1 While the Daylight and Sunlight Assessment concludes that impacts upon neighbouring properties will be negligible, the assessment appears limited in scope having regard to the scale, height and intensity of development proposed. The analysis relies heavily on screening exercises and shadow illustrations, with only a limited number of neighbouring properties subject to detailed quantitative assessment. Furthermore, the assessment does not appear to fully address impacts upon private gardens, cumulative effects, visual enclosure, outlook or broader residential amenity considerations. Accordingly, it has not been satisfactorily demonstrated that the proposed



development would not give rise to material adverse impacts on the amenities enjoyed by adjoining residential properties

#### 4.0 Conclusion

4.1 I, Andrew Hersey Planning Consultant, am acting on behalf of my client Gerard Boland of Newcastle, Castletroy, Limerick V94 AV2P and on behalf of the Monaleen Residents who comprise of the following residents:

- Anne Kerin – Corcomroe, Monaleen Road, Castletroy, Limerick
- Don & Elaine O'Malley – Sunning Hill, Monaleen Road, Castletroy, Limerick
- Charles & Ann O'Malley – Cooleen, Monaleen Road, Castletroy, Limerick
- Frank & Niamh Malone – Rowlands, Dublin Road, Castletroy, Limerick
- Paul & Sheena Gibson – Tulgargan Lodge, Castletroy, Limerick
- John and Mary Quinn – St Annes, Monaleen Road, Castletroy, Limerick
- Catrina Mularkey – Bellair, Dublin Road, Castletroy, Limerick
- Padraic & Clodagh Meade-McMahon – Tinnakilly, Monaleen Road, Castletroy, Limerick

1.2 My clients and their families reside in the immediate vicinity of the proposed development site along the Monaleen Road and Dublin Road. They have lived in the area for considerable periods and have long benefited from the residential amenities, established character and quiet environment associated with the locality

1.3 On behalf of my clients it is respectfully submitted that the proposed development gives rise to a number of fundamental planning concerns which, taken individually and cumulatively, warrant refusal of permission:

- (i) **Excessive Scale of Development and Population Intensification** -The proposal would introduce a population increase of approximately 1,500–2,000 residents within a single development, representing a substantial intensification of the area without a corresponding demonstration that the receiving environment possesses sufficient carrying capacity.
- (ii) **Overdevelopment and Cumulative Development Pressure** - The proposal must be assessed in the context of extensive recent and permitted development throughout Castletroy and Monaleen.



The cumulative residential pipeline significantly exceeds historic growth patterns and raises legitimate concerns regarding infrastructure capacity and over-intensification.

- (iii) **Inadequate Social and Community Infrastructure Provision** - Insufficient evidence has been provided demonstrating that educational facilities, childcare provision, healthcare services, recreational amenities and wider community infrastructure can adequately accommodate the population generated by the proposal.
- (iv) **Density Achieved Through Inappropriate Development Form** The principal concern is not density itself but the manner in which density has been achieved. The proposal appears heavily reliant upon apartment concentration and increased building heights rather than exploring high-density low-rise alternatives more responsive to suburban context.
- (v) **Scale and Building Height Incompatible with Receiving Environment** The concentration of four- and five-storey apartment buildings represents a visually intrusive and materially different urban form which fails to adequately reflect the prevailing low-rise suburban character of Monaleen Road and adjoining residential areas.
- (vi) **Adverse Impacts on Residential Amenity** Concerns remain regarding overlooking, visual dominance, increased activity levels, privacy impacts, boundary treatment adequacy and broader changes to the residential environment experienced by adjoining properties.
- (vii) **Transportation and Mobility Deficiencies** - Significant concerns remain regarding trip generation assumptions, future traffic forecasting, network resilience, road safety and reliance upon a constrained road network served by a single vehicular access point.
- (viii) **Continued Reliance on Private Car Use** -Notwithstanding the aspirations of the Mobility Management Plan, the proposal remains fundamentally car-dependent and relies upon future behavioural change and transport interventions not currently in place.
- (ix) **Insufficient Regard to DMURS and Vulnerable Road Users** - The Road Safety Audit identified a significant number of deficiencies and concerns remain regarding pedestrian movement, cycling provision, network legibility and the prioritisation of vulnerable users.
- (x) **Failure to Demonstrate Infrastructure-Led and Plan-Led Growth** - Taken cumulatively, the proposal has not satisfactorily demonstrated that development of this scale can be accommodated



in a coordinated, infrastructure-led manner consistent with the Development Plan, LSMATS and national planning policy objectives.

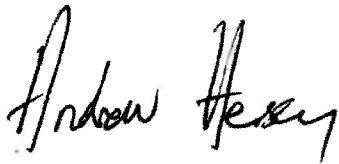
1.4 Accordingly, it is respectfully submitted that the proposal represents an excessive and over-intensive form of development which would give rise to unacceptable impacts upon infrastructure capacity, mobility, residential amenity and the established suburban character of the area. The proposal has not adequately demonstrated that the receiving environment possesses sufficient capacity to sustainably absorb development of this scale and therefore conflicts with the principles of coordinated, infrastructure-led and plan-led development promoted by the Development Plan, LSMATS and national planning policy.

1.5 With respect of the above therefore, I, Andrew Hersey Chartered Town Planner on behalf of my client Gerard Boland and the Monaleen Residents urge the Planning Authority to have regard to the foregoing and refuse planning permission for this development in its current format

If you have any further queries please get in touch with the undersigned.

Please find attached the requisite appeal fee of €220.00

Kind Regards



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Andrew Hersey BAgg.Sc. Dip. EIA Mgmt. MRUP MIPI Planning Consultant

3 Atlantic View

West End, Kilkee,

Co. Clare

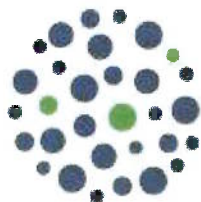
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From: OnlinePlanning onlineplanning@planning.localgov.ie  
Subject: Acknowledgement of receipt of submission on a planning application  
Date: 7 April 2026 at 12:41  
To: hersey.andrew@gmail.com



Rialtas Áitiúil Éireann  
Local Government Ireland

Submission  
150000043

Date of Iss  
07/04/2  
12:40

### THIS IS AN IMPORTANT DOCUMENT

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.

Limerick City and County Council

PLANNING APPLICATION REFERENCE No: 2660241

A submission/observation in writing, has been received from andrew hersey on 02/04/2026 in relation to the above planning application.

The appropriate fee of €20 has been paid. (Fee not applicable to prescribed bodies)

The submission/observation is in accordance with the appropriate provisions of the Planning and Development Regulations 2001 and will be taken into account by the planning authority in its determination of the planning application.

Yours faithfully,  
*Limerick City and County Council*

IS DOICIMÉAD TÁBHACHTACH É SEO

COINNIGH AN DOICIMÉAD SEO SLÁN. BEIDH ORT AN ADMHÁIL SEO A CHUR AR FÁIL DON BHORD PLEANÁLA MÁS MIAN LEAT ACHOMARC A DHÉANAMH IN AGHAIDH CHINNEADH AN ÚDARÁIS PHLEANÁLA. IS É SEO AN TAON FHIANÁISE AMHÁIN ATÁ ANN A NGLACFAIDH AN COIMISIÚN PLEANÁLA LEIS GUR CUIREADH AIGHNEACHT FAOI BHRÁID AN ÚDARÁIS PHLEANÁLA MAIDIR LEIS AN IARRATAS.

Limerick City and County Council

UIMHIR THAGARTHA AN IARRATAIS PHLEANÁLA: 2660241

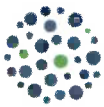
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Maidir leis an iarratas pleanála thuasluaite fuarthas aighneacht/tuairim i scríbhinn ó Andrew Hersey ar 02/04/2026.

Íocadh an táille chuí de €20. (Ní chaithfidh comhlachtaí forordaithe aon táille a íoc)

Tá an aighneacht/tuairim ag teacht leis na forálacha cuí atá i Rialacháin Phleanála agus Forbartha 2001 agus cuirfidh an tÚdarás Pleanála sin san áireamh agus é ag déanamh cinneadh ar an iarratas pleanála.

Is mise le meas,  
Limerick City and County Council



Rialtas Áitiúil Éireann  
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Is faoi rún agus chun úsáide an té a sheoltar an ríomhphost seo agus aon comhad atá nasctha leis. Má bhfuair tú an ríomhphost seo trí earráid, déan teagmháil leis an seoltóir a luaithe is féidir. Ní hionann na tuairimí luaite sa ríomhphost seo agus tuairimí An Gníomhaireacht Bainistíochta Rialtais Áitiúil. Deimhnítear leis an bhfo-nóta seo freisin go bhfuil an teachtaireacht ríomhphost seo agus aon comhad atá nasctha leis scuabtha le bogearraí frithviorais chun viorais ríomhaire a aimsiú agus is cosúil go bhfuil siad glan. Bí cinnte an ríomhphost seo a mionscrúdú, mar ní ghlacann An Gníomhaireacht Bainistíochta Rialtais Áitiúil freagracht faoi aon damáiste a dhéanfaí le do chórais ríomhaireachtaí. \*\*\*\*\*

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**PUBLIC MEETING**



# TALK TO CONOR

***HOUSING · INFRASTRUCTURE · COMMUNITY***

**Residents of Castletroy, Monaleen  
and Annacotty**

**Monday  
25th May - 7:30pm**

**Hurlers Bar,  
Castletroy, Limerick**

**Scan QR Code  
to register:**



**Hosted By:  
Conor Sheehan TD**



This is a political advertisement on behalf of Conor Sheehan, the Labour Party TD for Limerick City.  
Visit [labour.ie/transparency](http://labour.ie/transparency) for more information





# TALK TO CONOR

Conor **Sheehan** TD  
working for you

Labour

## PUBLIC MEETING

As TD for Limerick City, I've seen first hand the extraordinary growth of Castletroy.

Castletroy has rapidly developed into a vibrant, densely populated community, driven by families, students, and businesses choosing to make their home here.

With that growth comes responsibility. We cannot allow infrastructure and services to lag.

Castletroy needs investment in community facilities—spaces where people can gather, where young people can play and learn, and where older residents can remain active and connected. Alongside this, we must urgently address transport links, road capacity, pedestrian safety, and public amenities.

This is not a challenge that can be solved in isolation; it requires the voices and input of the people who live here.

That's why I'm encouraging all residents, local business owners, students, and community groups to attend my upcoming **Public Meeting on Monday May 25th in the Hurlers, Castletroy, 7.30pm.**

This is an opportunity to shape a shared vision, to raise concerns, and to put forward practical ideas.

**Castletroy's future should be built with its community, not simply for it, and your participation is essential in making that happen.**

Constituency Office: 37 Mary St, Limerick, V94 Y990.

☎ 085 8355117



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