

Strategic Housing Unit
An Bord Pleanála
64 Marlborough Street
Dublin 1

Wednesday, 6th October 2021

[By Hand]

PLANNING REPORT

RE: PROPOSED STRATEGIC HOUSING DEVELOPMENT (SHD) ON LANDS AT FORMER GREENPARK RACECOURSE, DOCK ROAD, LIMERICK.

Dear Sir/Madam,

1.0 INTRODUCTION

Tom Phillips + Associates, Town Planning Consultants, is instructed by our Client, Voyage Property Limited (referred to from hereon as the 'Applicant'), to submit this planning application in respect of the proposed Strategic Housing Development (SHD) on lands at former Greenpark Racecourse, Limerick.



Figure 1.1: Aerial image of the application site, shown in the context of the wider former Greenpark Racecourse lands (annotated by Reddy Architecture and Urbanism, 2021)

TOWN PLANNING CONSULTANTS

In summary, the proposed development will have a total gross floor area of c. 36, 879 sq m and will consist of the provision of 371 no. residential units comprising:

- **157 no. two storey houses**
(consisting of 10 no. 4 bedroom units, 110 no. 3 bedroom units and 37 no. 2 bedroom units);
- **76 no. three storey duplex units**
(consisting of 14 no. 3 bedroom units, 38 no. 2 bedroom units and 24 no. 1 bedroom units); and
- **138 no. apartments**
(consisting of 92 no. 2 bedroom units and 46 no. 1 bedroom units.)

The proposed apartments will be arranged in 3 no. blocks ranging between 4 and 5 storeys.

The proposed development will also consist of a 550 sq m childcare facility, a 374 m long access road which joins into Dock Road at the north-western corner of the former Greenpark Racecourse lands and other ancillary infrastructure, including 510 no. car parking spaces, bicycle parking and external amenity space. The proposal also includes bulk earthworks which will result in site formation levels of 4.7 OD.



Figure 1.2: Extract from Proposed Site Plan – sht 2 Dwg. No. ZZ-ZZ-DR-A-02.1004 Rev A, prepared by Reddy Architecture and Urbanism.



This submission was prepared by Tom Phillips + Associates, Town Planning Consultants, in conjunction with, *inter alia*:

- Reddy Architecture and Urbanism;
- PUNCH Consulting Engineers;
- RPS;
- Gavin Doherty Geosolutions (GDG);
- Murray and Associates Landscape Architects;
- Ecology Ireland;
- RSK;
- ARC Architectural Consultants Limited.

This submission provides the full suite of information required to support a planning application in respect of a SHD proposal. Please find enclosed a full schedule of drawings and documents.

1.1 Purpose of this Report

This Planning Report should be read in conjunction with the *Statement of Consistency* which outlines the overall compliance of the proposed development with national, regional and local planning policy. This Report sets out the acceptability of the proposed development in relation to the key planning issues pertaining to the application site.

For full details on the design and the design quality of the proposed development, refer to the enclosed *Design Report*, prepared by Reddy Architecture and Urbanism and the *Landscape Report* prepared by Murray and Associates.

For site wide context, refer to the enclosed *Greenpark Masterplan 2020* document, prepared by Tom Phillips + Associates.

2.0 SITE AND PLANNING CONTEXT

2.1 Site Location

The application site is c.10.5 ha and is located c.2km to the south-west of Limerick City Centre and within the townland of Ballinacurra (Hart). The site is principally bounded by existing undeveloped lands to the north, south (open land, formerly part of the racecourse) and west (open ground with the greyhound track) and the adjoining Log na gCapall Housing Estate and Greenpark Avenue to the east and north-east.



Figure 2.1: A panoramic photograph of the former Greenpark Racecourse lands, taken from the south-east, close to Greenpark Avenue (TPA, 2020)



Figure 2.2: Photograph from the Log na gCapall residential estate, showing the existing access gate to the subject lands (TPA, 2020)

The application site has a substantive development area of c.7.9 ha which will accommodate the residential development. The remaining 2.6 ha includes the proposed access road and the

‘over burden area’ in respect of the earthworks associated with site levelling and achieving the required formation levels.

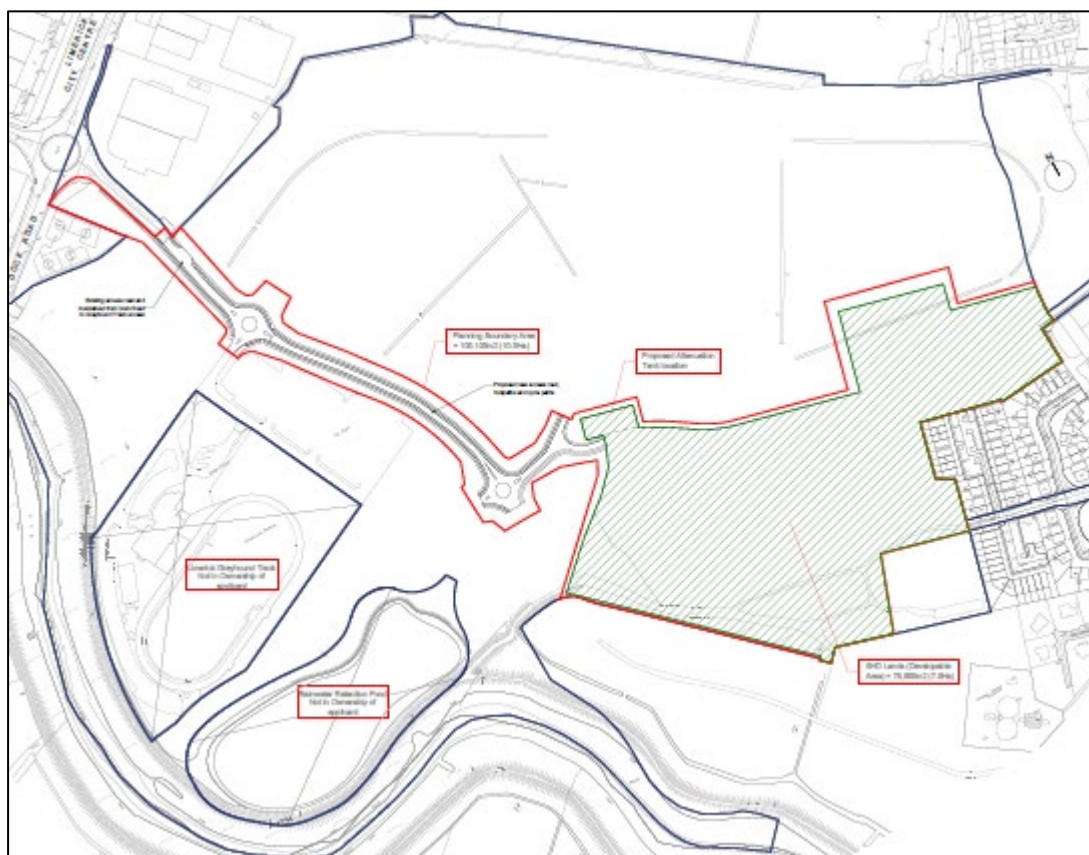


Figure 2.3: Extract from the SHD Development Area Designations Dwg. No. ZZ-ZZ-DR-A-02.1020 Rev A, prepared by Reddy Architecture and Urbanism.

The surrounding area comprises a number of land uses. The primary form of development to the east of the site is low rise residential development. To the north, north-west and west of the site is a number of commercial buildings, with a number of community use, schools and retail buildings in the vicinity. The Limerick Greyhound Stadium adjoins the Applicant’s lands and continues to operate as a greyhound stadium.

The Ballinaclogh River, a tributary of the River Shannon, flows to the south-west of the site but does not directly abut its boundary.

In terms of proximity and accessibility to the wider environs, the site is located approximately 2km from Limerick City Centre, 1.2km from Crescent Shopping Centre, 1.6km from the Regional Hospital and 4.1km to Raheen Business Park. There are a number of bus routes (e.g. 304 and 301) that service the bus stops closest to the site, including the stops at Lifford Gardens and on the corner of South Circular Road and Ballinacurra Road and provide access to the City Centre.



2.1 Environmental Context

In accordance with the EIA Directive and the *Planning and Development Regulations 2001 (as amended)*, this planning application is supported by an *Environmental Impact Assessment Report* (EIAR) which confirms that with the proposed mitigation in place, the proposal will not give rise to significant environmental effects. In addition to this, this submission is accompanied by a *Natura Impact Assessment* (NIS) which supports the Appropriate Assessment Process in line with the Birds and Habitats Directives.

The application site lies within close proximity to two Natura 2000 sites (the Lower River Shannon SAC and the River Shannon and River Fergus Estuaries SPA). The NIS examines potential effects to Natura 2000 sites screened in as part of this Screening for Appropriate Assessment (the SAC and SPA referred to above) and concludes:

“It can be objectively concluded that no significant effects arising from the proposed development are likely to occur in relation to the Natura 2000 sites (i.e. The Lower River Shannon SAC and The River Shannon and River Fergus Estuaries SPA) or indeed any other Natura 2000 site in the wider hinterland.”

From a flood risk perspective, a large part of the application site is located within Flood Zone C, with a small area in Flood Zone B and the remaining portion located within Flood Zone A. As a result, this application submission is supported by a Flood Risk Assessment which, in line with the *Planning System and Flood Risk Management Guidelines*, applies the Development Management Justification Test.

The Report concludes that the proposal complies with these Guidelines:

“Based on the proposed mitigation measures, consideration of the designated zoning and the proposed urban design, each of criteria in the Development Management Justification Test was shown to be satisfied. Therefore it was concluded that the proposed development complies with the requirements of the Development Management Justification Test and hence is compliant with ‘The Planning System and Flood Risk Management Guidelines’.” (page 41)

Refer to the documents referenced above for full details.

2.2 Masterplan Context

The application site is a portion of the former Greenpark Racecourse lands, which are c.47 ha in total and also within the control of the Applicant (denoted by the blue line shown in Figure 2.3). This strategically important landholding has been subject to a Masterplanning exercise which provides for the future development of the former Racecourse over a number of phases and future connection into adjoining lands. The Masterplan largely evolved from a review of the planning history whereby the Planning Authority (Limerick City and County Council) and An Bord Pleanála have made strong recommendations for the preparation of a Masterplan to inform the future, coherent, development of the overall lands. The Masterplan has therefore been developed in consultation with Limerick City and County Council (LCCC) and accompanies this application submission for information purposes. This application relates to the proposed SHD only which is Phase 1 of the Masterplan.

We highlight that in responding to the Board’s Opinion following the tripartite meeting, the SHD proposal was amended to provide a more favourable residential density and housing mix in the context of the relevant national guidelines. This also resulted in revisions to the site wide Masterplan. The updated Masterplan is presented in the *Design Report* prepared by Reddy Architecture + Urbanism. The *Greenpark Masterplan 2020* document has not been updated as the assessment undertaken in respect of the original Masterplan is considered to remain relevant.

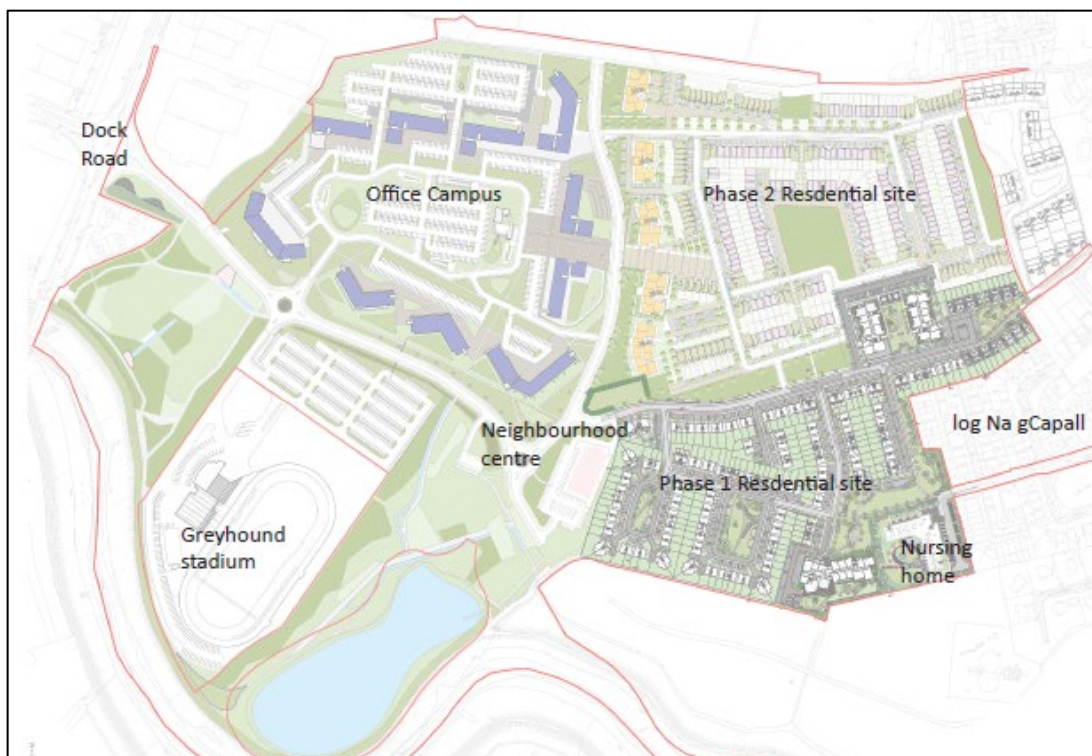


Figure 2.4: Overview of the updated Masterplan proposal for the former Greenpark Racecourse lands, prepared originally by Lafferty Architects and updated by Reddy Architecture + Urbanism.

As set out within the *Design Report*, the overall masterplan proposal contains a multi-phased residential development, office campus, neighbourhood centre, creche, nursing home and public open spaces. With the potential to deliver 920 no. residential units and 39,500 sq m of office floorspace, the Masterplan proposal provides a significant opportunity to contribute to the delivery of housing and employment in the Limerick City area, in line with national, regional and local policy objectives.

In terms of the residential component of the Masterplan, an overall total of 920 no. residential units are proposed, equating to an overall residential density of 50 units per hectare. This SHD application relates to the first phase of the residential component of the masterplan and, as previously stated, will deliver 371 no. residential units, a creche and the access road that will link into the Dock Road. The proposed access road will also facilitate the delivery of the later phases of the Masterplan.

It is also noteworthy that nursing home component of the Masterplan is currently a live planning application for 126 no. bed spaces (LCCC Reg. Ref. 21/1222). The proposed nursing home is located in the south eastern corner of the lands and to the immediate south east of the proposed SHD site. This SHD submission, where necessary, has regard to the cumulative environmental impacts of the proposed SHD and the proposed nursing home development.

2.3 Strategic Planning Context

The SHD application site benefits from a residential land use zoning under the provisions of the *Limerick City Development Plan 2010-2016* (as varied). The specific 'Zoning Objective 2A – Residential' states – “To provide for residential development and associated uses”.

In addition to this, part of the proposed access road spans land which is subject to 'Zoning Objective 5A – General Mixed Use' and 'Zoning Objective 5C – Neighbourhood Centres' which also provide for residential use.

Furthermore, in relation to the residential redevelopment of the site, the *Limerick City Development Plan 2010-2016*, in its Core Strategy, makes reference to role that the County's 'Undeveloped Zoned Housing Land' will play in the delivery of the required quantum of housing. In this regard, the Strategy makes specific reference to the subject lands ('Former Racecourse') and notes that the overall site has capacity to deliver 1,188 units.

2.4 Movement Strategy

As shown on Figure 2.4, the proposed primary access for the overall Masterplan development and the proposed SHD is via Dock Road. The SHD proposal includes the provision of the new access road which will facilitate the delivery of future phases of the Masterplan, in addition to the SHD itself. The proposed access road will also provide cycle and pedestrian paths between the application site and Dock Road.

The proposed SHD also provides for pedestrian and cyclist connections between Log na gCapall and Greenpark Avenue and the application site. Emergency access is also provided via these routes.

2.5 Part V

The Applicant has engaged in discussions with Limerick City and County Council in relation to Part V obligations. We refer to the enclosed Part V details and highlight that the Council have confirmed that the proposed transfer of the identified 37 no. units is agreed in principle.

2.6 Pre-Application Consultation

Significant pre-application has taken place with Limerick City and County Council in respect of the SHD proposal and the Masterplanning process. The S247 pre-planning meeting in relation to the SHD proposal took place on 29th January 2021.

The key issues raised during these discussions were flooding and residential density. These issues are addressed in full within this submission.

The Tripartite meeting with An Bord Pleanála took place on 24th June 2021. The points raised at this meeting and later documented within the Board's Opinion are addressed in detail in the *Response to ABP Opinion* prepared by Tom Phillips + Associates.

Further to this, consultation was undertaken with Irish Water prior to the submission of this application. See the Design Acceptance letter and Confirmation of Feasibility letter at Appendix C of the *Engineering Planning Report* prepared by PUNCH Consulting Engineers.



3.0 PLANNING HISTORY

3.1 Overview of Planning History

We conducted a planning history search of the site using Limerick City and County Council's online planning history search facility and that of An Bord Pleanála, in order to establish the planning history of the subject site and of similar sites in the vicinity.

LCCC Reg. Ref.	Decision & Date	Brief Development Description	Appeal? Decision at Appeal. Extension of Duration?
01/770130	Approved subject to 19 no. conditions, 04/06/2002	For the development of lands for infrastructure to include a new roundabout on the N69 (Dock Road), roads, sewers, watermains, other underground services and landscaping (construction of the roads and services for the future development of lands).	1 st Party and 3 rd Party Appeal. Grant permission with revised conditions. (ABP Ref. 30.130232)
03/770343	Approved, subject to 5 no. conditions, 26/02/2004	Permission for a new roundabout on the N69 (Dock Road).	
04/770586	Withdrawn	Mixed use scheme including 30,881 sq m retail space, including a supermarket, two ancho comparison units and 39 no. additional retail units. The development also included a c. 3,500 sq m food court, car parking and recreation amenity area with 1 no. full size soccer pitch, 10 no. 5-a-side pitches and 4 no. tennis courts.	
05/770014	Approved, subject to 26 no. conditions, 09/03/2007	Mixed use scheme including 353 no. residential units (112 no. apartments, 17 no. maisonette apartments, 54 no. semi-detached units, 70 no. detaches houses, 43 no. terraced houses, 29 no. duplex units and 28 no. apartments below duplex units.) The application also includes a neighbourhood centre incorporating a creche, retail unit, coffee shop and doctor/dentist unit with associated car parking, play pitches and amenity area.	1 st Party Appeal withdrawn. Extension of duration refused in 2013)
05/770390	Withdrawn	Raise land levels at the old racecourse using clean inert construction and demolition waste and subsoil.	
07/770237	Approved, subject to 4 no.	Raise land levels at the old racecourse using clean inert construction and demolition waste and subsoil	



	conditions, 12/03/2008		
07/770453	Refused, for 2 no. reasons, 14/08/2008	Housing scheme and a creche. Development including 222 no. residential units (90 no. houses, 78 no. duplex/apartment units and a 54 no. unit retirement village.)	1 st Party Appeal, Refused (inadequate public space, amenity space lacking in retirement home element) (ABP. Ref. 30.230944)
07/770470	Approved, subject to 21 no. conditions, 01/07/2008	Provision of a greyhound racing stadium, with associated access road and car parking.	
08/770311	Withdrawn	Housing development consisting of 300 no. units (17 no. 4 bed detached units, 12 no. 6 bed detached units, 16 no. 4 bed semi detached units with garage, 36 no. 4 bed semi detached units without garage, 78 no. 3 bed semi detached units, 63 no. 4 bed 3 storey town houses, 27 no. 3 bed duplexed and 27 no. 3 bed apartments and 24 no. apartments;) filling of lands by over 300 mm in certain areas to allow for houses to be constructed, associated access roads and car parking.	
15/428	Refused, for 1 no. reason, 11/12/2015	The construction of 110 housing units (comprising 31 no. 4 bed detached units, 72 no. 4 bed semi-detached units, 4 no. 3 bed semi-detached units, 3 no. 3 bed terraced unit), including the filling of lands in certain areas to allow housing to be constructed.	1 st Party Appeal Refused (traffic, particularly impact on Log na gCapall) and piecemeal and premature development pending provision of a wider masterplan for the Greenpark Racecourse lands.) (ABP. Ref. 91.246035)



Reg. Ref. 21/1222	Undecided.	Proposed 126 no. bed nursing home development.	Reg. Ref. 21/1222
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3.2 Key Decision – LCCC Reg. Ref. 15/428

This application to Limerick City and County Council comprised of the proposed construction of 110 no. housing units accessed from the South Circular Road, via Log na gCapall. The application also included filling of lands in certain areas to allow for housing to be constructed at an appropriate finished floor level. The application also included the provision of site development works, services infrastructure, landscaping and all associated site works at the former Greenpark Racecourse, Dock Road, Limerick.

Planning permission was refused by LCCC on 11th December, 2015 for 1 no. reason which stated;

“The proposed development would be contrary to the proper planning and development of the area in that the applicant has failed to adequately demonstrate to the satisfaction of the Planning Authority that vehicular access through the existing housing estate of Log na gCapall is the most appropriate option available as detailed in the Travel & Transport Department Report received on the 10th December 2015. It is therefore considered that as presented the proposed development would not be in accordance with the proper planning and sustainable development of the area.”

First Party Appeal to An Bord Pleanála

A First-Party Appeal was lodged by the Applicant to An Bord Pleanála on the 15th January, 2016.

An Bord Pleanála upheld the Council’s decision to refuse planning permission in a decision issued on 19th May, 2016. In his assessment of the proposed development, the Board Inspector noted the following;

*“Given the fact that the subject site is located within the established development boundaries of Limerick City, is zoned for residential purposes and can connect to public services, **the principle of development at this location is considered acceptable and in compliance with the general thrust of national guidelines and strategies.** The 2008 guidelines updated the Residential Density Guidelines for Planning Authorities (1999), and continue to support the principles of higher densities on appropriate sites in towns and cities and in this regard, **I consider that it is reasonable to support the development potential of the subject site in accordance with said guidelines.** The development proposes the construction of 108 dwelling units on a site covering approximately 4.85ha and in terms of the recommendations of the Guidelines, **the density could be considered at the lower levels permissible on such zoned lands. However, given the nature of site and its location within the context of the overall area, I have no objection to the proposed density of same.**” [Our Emphasis]*

The 2 no. reasons for refusal issued by the Board are as follows;



1. *Notwithstanding the zoning objective afforded to the subject site, and having regard to the level of information submitted in support of the proposed development to date, the details of the existing traffic assessment, the requirements of the Design Manual for Urban Roads and Streets, the original master plan proposals in terms of access to the overall Racecourse site, the existing residential developments in the area and the potential impact of the proposed development and the traffic generated together with the already congested local road network, **the Board is not satisfied that the proposed development would not result in a significant traffic hazard for existing residents in the area, would contribute to traffic congestion within the local road network and would adversely affect the existing residential amenities of Log na gCapall and the carrying capacity of South Circular Road and the Ballinacurra Road, the R526, an important traffic route for Limerick City by reason of the additional traffic resulting from the proposed development.***

It is, therefore, considered that the proposed development would endanger public safety by reason of traffic hazard, would cause serious traffic congestion, and would be contrary to the proper planning and sustainable development of the area.”

2. ***It is considered that the proposed development would constitute piecemeal and premature development pending the provision of vehicular access to the site from Dock Road in accordance with an agreed Masterplan for the entire Greenpark Racecourse site. Accordingly, it is considered that the proposed development would be contrary to the proper planning and sustainable development of the area.”*** [Our Emphasis]

The above is a pertinent decision in respect of the application site and has informed the approach taken, process followed and design evolution in respect of the current SHD proposal and supporting Masterplan. The Masterplanning process has been designed to ensure that the lands are optimised and that their overall redevelopment is comprehensive and in line with the sustainable development and proper planning of the area.

The supporting Masterplan ensures that the phased redevelopment of the lands is undertaken in a comprehensive manner, in line with strong urban design principles that have regard to the site-specific characteristics. The current scheme has therefore been designed and structured to respond directly to the Board’s second reason for refusal in respect of LCCC Reg. Ref. 15/428.

Furthermore, the proposed SHD will be accessed via Dock Road, and therefore also directly addresses the Board’s first reason for refusal in respect of traffic impact upon the local streets at Log na gCapall. The overall Masterplan does however seek to ensure permeability and connectivity between the wider subject lands and surrounding lands and existing streets in line with planning policy and good urban design practice. The proposed SHD therefore provides for pedestrian and cyclist connections between Log na gCapall and Greenpark Avenue and the application site.



4.0 KEY PLANNING ISSUES

This section has regard to the key planning issues arising from the proposed development and is informed by the site-specific assessments contained within the enclosed documents, the planning history for the site and consultation discussions undertaken with An Bord Pleanála and Limerick City and County Council as part of the masterplanning and SHD processes.

As previously noted, this Report should be read in conjunction with the enclosed *Statement of Consistency* which demonstrates that the proposed development aligns with national, regional and local planning policy objectives and guidance. The *Environmental Impact Assessment Report* (EIAR) also provides a detailed assessment of the potential environmental impacts of the proposed development and demonstrates that significant impacts would not arise, subject to the implementation of the proposed mitigation measures.

4.1 Provision of Masterplan

As set out in Section 3, our review of the overall landholding's planning history confirms that both LCCC and An Bord Pleanála have strongly recommended the preparation of a Masterplan in relation to the overall landholding is required to guide and inform its future development in a coherent and comprehensive manner.

The Masterplan (referred to as the *Greenpark Masterplan 2020*) was prepared by Tom Phillips and Associates, in association with the Applicant and a multi-disciplinary team. This document goes significantly beyond just an architectural vision and provides a range of site wide assessments including planning; hydrology and hydrogeology; drainage; traffic and transportation; biodiversity; landscape; design; flood risk and indicative phasing.

As explained above, the Masterplan has been updated following the tripartite meeting and receipt of the Board's Opinion; the SHD proposal was amended to provide a more favourable residential density and housing mix in the context of the relevant national guidelines. The site wide Masterplan was also updated to reflect this. The updated Masterplan is presented in the *Design Report* prepared by Reddy Architecture + Urbanism. The *Greenpark Masterplan* document has not been updated as the assessment undertaken in respect of the original Masterplan is considered to remain relevant.

The current Greenpark Masterplan illustrates a mixed-use development vision for the lands consisting of an office campus (39,500 sq m); 920 no. residential units (including houses, duplexes and apartments); neighbourhood centre; nursing home; crèche and open space provision with related car parking, ancillary services and roads infrastructure including indicative access arrangements and internal roads and pedestrian/cycle links through the site.

The primary access to the site for the Masterplan development is via Junction 1 (Greenpark Roundabout) on the N69 with a potential future link road to the Alandale Roundabout. It is envisaged that the addition of a link road to the Alandale roundabout would reduce the trip generation from the Masterplan associated with Greenpark Roundabout on the Dock Road.

Internal cycle lanes and footways will form part of the development and have been located adjacent to the future Link roads to encourage pedestrian movement and cycling in line with the requirements of the *Limerick City and County Development Plan 2010-2016* (as extended) and in accordance with the *Draft Limerick/ Shannon Transport Strategy 2040*. The proposed Masterplan includes cycle path/ footpath connectivity through the site to facilitate connecting



the Dock Road and the South Circular Road. Additional pedestrian/ cycle access points are provided to the boundary of Log na gCapall and Greenpark Avenue.

The original Masterplan, including the underpinning assessments, is set out in the *Greenpark Masterplan 2020* document enclosed with this submission. The updated Masterplan is contained within the *Design Report*. In addition to addressing the Board's reason for refusal in respect of LCCC Reg. Ref. 15/428, the Masterplan provides a strong basis for the proposed SHD scheme and demonstrates the acceptability and feasibility of the redevelopment of the lands from a planning and environmental perspective.

In line with national, regional and local policy, the Masterplan is considered to unlock the development potential of these largely undeveloped and overall underutilised lands within the suburbs of Limerick City. As noted within the Development Plan's Core Strategy, the subject lands, as an example of 'Undeveloped Zoned Housing Land', will play a crucial role in the delivery of the required quantum of housing in the Limerick City area.

4.2 Housing

Residential Density

The Masterplan for the overall site includes a significant residential component which provides for 920 no. residential units, resulting in a residential density of 50 units per hectare.

The site boundary for the proposed SHD encompasses a total of 10.5 ha of land. As shown on Figure 2.3, the application site has a substantive development area of c. 7.9 ha which will accommodate the residential development. The remaining 2.6 ha will accommodate the proposed access road connecting the proposed housing development with the Dock Road and bulk earthworks.

On the basis that no development, beyond the works associated with the earthworks, will be located within the areas of overburden and that the proposed access road will serve the wider masterplan area, we have excluded both areas for the purposes of the net residential density calculation. We maintain that this methodology accords with 'Appendix A: Measuring residential density' of the *Sustainable Residential Development in Urban Areas (Cities, Towns and Villages) – Guidelines for Planning Authorities (2009)*.

This SHD proposal therefore has a substantive development area of c.7.9 ha and results in a net residential density of 47 units per hectare.

As detailed in the *Statement of Consistency*, full regard has been given to the proposed residential density in the context of both national and local planning policy. From a national policy perspective, we have considered the proposed development in conjunction with the *Sustainable Residential Development in Urban Areas (Cities, Towns and Villages) – Guidelines for Planning Authorities (2009)* and the *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (March 2018)*. In order to establish the appropriate density in the context of these Guidelines, we have given full consideration to the locational characteristics of the site in terms of its proximity to Limerick City centre and significant employment locations and to the nature of the public transport connections and accessibility at the site.



We note that the application site is in a well-located suburban location that has the potential to contribute to the delivery of housing and the compact growth of urban centres in line with national and regional policy objectives. We do however further note that the site does not have access to a high standard of public transport that other more centrally located sites might.

In this regard, we have had regard to the national guidelines that pertain to residential density to determine the appropriate density for a development in the proposed location.

We note that the *Sustainable Residential Development in Urban Areas (Cities, Towns and Villages) – Guidelines for Planning Authorities (2009)* provides national guidance in relation to the appropriate locations for the siting of higher density residential development, having regard to the locational characteristics of the lands in question.

Having considered the locational characteristics of the site in relation to its proximity to Limerick City centre and significant employment locations and public transport connections and accessibility to same, we maintain that the application site comprises ‘Outer Suburban/Greenfield’ lands. In this regard, we consider the application site to reflect the definition referred to in Section 5.11 of these Guidelines:

“These may be defined as open lands on the periphery of cities or larger towns whose development will require the provision of new infrastructure, roads, sewers and ancillary social and commercial facilities, schools, shops, employment and community facilities. Studies have indicated that whilst the land take of the ancillary facilities remains relatively constant, the greatest efficiency in land usage on such lands will be achieved by providing net residential densities in the general range of 35-50 dwellings per hectare and such densities (involving a variety of housing types where possible) should be encouraged generally. Development at net densities less than 30 dwellings per hectare should generally be discouraged in the interests of land efficiency, particularly on sites in excess of 0.5 hectares.” [Our Emphasis]

The overall Masterplan residential density and the net density for the SHD proposal therefore complies with the density range of 30-50 units per hectare that is considered appropriate, by these Guidelines, for such locations.

Following this, we have had regard to residential development in the context of *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (March 2018)*. These *Guidelines* seek to promote high density apartment development on residentially zoned land in appropriate locations in line with the overarching national policies that encourage residential development within existing urban settlements. The proposed development includes 3 no. apartment blocks comprising 138 no. apartment units and 76 No. duplex units to which these Guidelines, from a standards perspective, apply.

When applying the locational criteria set out within the Guidelines, the proposed development is considered to fall within the ‘Intermediate Urban Location’ category. For such locations, the Guidelines state:

“Such locations are generally suitable for smaller-scale (will vary subject to location), higher density development that may wholly comprise apartments, or alternatively,



medium-high density residential development of any scale that includes apartments to some extent (will also vary, but broadly >45 dwellings per hectare net)”

We have applied the Intermediate locational criteria within the enclosed *Statement of Consistency* to demonstrate the alignment of the application site with this category.

As set out above, the locational characteristics of the subject site broadly align with the Intermediate criteria. Following on from this, we note that the application site does not meet the criteria for Central and/or Urban Accessible locations, where higher densities are encouraged.

The overall Masterplan residential density of 50 units per hectare aligns with the broad guideline (*“will also vary, but broadly >45 dwellings per hectare net”*) provided in relation to Intermediate locations. The proposed SHD residential density of 47 u/h also aligns with this and is considered to be appropriate given this context.

Lastly, the *Limerick City Development Plan 2010-2016* contains Policy H.4, H.5 and H.6 which relate to residential density, increased density and sustainable residential development, respectively. Policy H.4 states that the Council will have regard to the relevant national policies and objectives, whilst Policy H.5 states the following:

“It is the policy of Limerick City Council to promote increased density where appropriate to do so, having regard to the existing or proposed public transport provision and proximity to the city centre.”

With reference to the above national policy, we have demonstrated the appropriateness of the proposed residential density of the Masterplan and the SHD proposal in respect to the application site’s locational characteristics in the context of its proximity to the city centre and public transport accessibility and connectivity. We therefore contend that the proposed residential densities comply with Policy H.4 and H.5 and provide a sustainable residential density in line Policy H.6 and the national guidelines.

Further to this, in relation to ‘Outer City’ locations, the Development Plan suggests the following indicative densities:

“Densities in excess of 35-50 dwellings per hectare shall be encouraged subject to appropriate qualitative safeguards. In addition, schemes adjoining public transport routes, or close to major centres of employment may be encouraged to exceed this figure.”

Further to the above, the Development Plan also states:

“Where increases in density are desirable, these should be sought by introducing variety in built form into the layout. This could include the use of terraced houses, apartments and duplexes.”



On the basis that the subject site is located in the suburbs of Limerick City, both the residential density of the overall Masterplan and the proposed SHD are considered to be appropriate and in line with the Development Plan's indicative density standard.

Furthermore, we note that the proposed development aligns with this particular Development Management standard in that it achieves a density of 47 units per hectare through the introduction of a variety of housing types to the site, comprising apartments, duplexes and apartments.

Housing Mix and Overall Standard of Accommodation

The proposed apartment component of the development complies in full with the *Specific Planning Policy Requirements (SPPRs)*, including certain minimum and maximum standards, contained within the *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (2018)*. This includes apartment mix and the provision of private open space.

The proposed housing component of the development complies with the *Quality Housing for Sustainable Communities (2007)* and the relevant Development Management Standards contained within the Development Plan, including the provision of private open space. Refer to the enclosed *Housing Quality Assessment* for full details in this regard.

We note that the Development Plan highlights the importance of the provision of 3/3+ bedroom houses in order to achieve balanced communities. It also highlights that large units are flexible in that they can accommodate a variety of household types.

The proposed development includes 120 no. family sized houses (3 bed +). In addition to this, the development provides a further 14 no. family sized duplex units. The proposed development therefore fulfils this requirement. However, the design of the proposed SHD ensures (in order to achieve wider policy objectives, including those set at a national level) that the proposed family units sit within a scheme that offers a variety of unit size and type, providing for a mixed and balanced community. We therefore confirm that the proposed development accords with the Development Plan and national guidance, in this regard.

Otherwise, the majority of the proposed apartments and duplex units are dual and triple aspect, achieving a dual aspect ratio for the overall development of 76%.

The proposed development is also supported by an *Assessment of Daylight and Sunlight Access within the Proposed Development*. This Report confirms, following an assessment of a representative sample of rooms within the proposed development, that all sample study rooms within the proposed development are predicted to achieve a level of daylight in excess of that recommended by the BRE Guidelines.

Furthermore, this assessment confirms that the proposed communal spaces within the development are predicted to achieve a high level of sunlight access throughout the day and year, in excess of the level recommended by the BRE Guidelines.

The enclosed *Housing Quality Assessment* and related drawings prepared by Reddy Architecture + Urbanism demonstrate compliance with the relevant standards both for the proposed apartments and duplexes.

Building Height, Visual and Amenity Impact

The proposed development is relatively modest in terms of building height, ranging from two to five storeys. As a result, the design of the development ensures a sensitive relationship with the surrounding context.

The proposed SHD is bound in part to the east by existing residential development. Due to the scale of development and the separation distances provided, it is not considered that the proposed development would give rise to an unacceptable impact upon the amenities of neighbouring occupiers by way of loss of privacy or overlooking.

Chapter 15 'Microclimate – Daylight and Sunlight' of the enclosed EIAR relates to the potential daylight and sunlight impacts of the proposed development upon the receiving environment. This Chapter confirms that the proposed development would not give rise to an unacceptable impact upon neighbouring development from a daylight, sunlight and overshadowing perspective. Where some impact has been identified, the impact has been classified as minor or imperceptible.

Chapter 13 'Landscape and Visual Impact' has regard to the potential impact of the proposal upon sensitive landscape and visual receptors in the surrounding area. It concludes that the proposed development, with landscape related mitigation measures in place, would not result in significant adverse impacts.

We therefore contend that the proposed development is compatible with existing surrounding development.

4.3 Traffic and Transport

Movement Strategy

The previous decision at the subject lands (LCCC Reg. Ref. 15/428) noted traffic impacts upon the local road network, including Log na gCapall, South Circular Road and Ballinacurra Road, as a reason for the refusal of planning permission. The second reason for refusal further stated that the new development at the subject lands would require vehicular access from Dock Road.

As noted previously, both the Masterplan (excluding the proposed nursing home development) and proposed SHD provide access to the development from Dock Road. The proposed access road that facilitates this is proposed as part of the current application. We therefore contend that the proposed SHD will not result in an unacceptable impact, from a traffic perspective, upon the local road network as referred to in relation to LCCC Reg. Ref. 15/428. The enclosed *Traffic and Transportation Assessment* confirms "*as demonstrated in the capacity analysis, the surrounding road network will not experience significant impact from the proposed SHD development*" (page 42).

In line with planning policy and best urban design best practice, the overall Masterplan does however seek to ensure permeability and connectivity between the wider subject lands and surrounding existing streets. The proposed SHD therefore provides for pedestrian and cyclist connections between Log na gCapall and Greenpark Avenue and the application site. The proposed access road which links into Dock Road also provides for sustainable modes of transport, with cycle and pedestrian lanes provided.



Further to the above, the enclosed *DMURS Compliance Statement* confirms that the proposed development is consistent with the principles and guidance of DMURS, insofar as this applies to residential schemes.

Car and Bicycle Parking

The proposed development includes 510 no. car parking spaces. These will serve the residential development and the childcare facility. As set out in Section 9.2.2 of the *Traffic and Transport Assessment*, the proposed parking provision substantially complies with the Development Plan. Further to this, the proposal includes the provision of Electric Vehicle Charging Points (EVCP) and 4 no. car sharing spaces.

Cycle parking has also been provided in line with the Development Plan and Apartment Guidelines requirements, at one space per unit and one visitor space per every two apartment units. On this basis, the proposed development provides a total of 371 no. long stay spaces for the residential development, 107 no. visitor spaces arising from the apartment development and 20 no. spaces for the childcare facility.

The proposed SHD development is considered to be acceptable from a traffic and transportation perspective. The enclosed *Traffic and Transportation Assessment* has regard to the proposed development from a traffic perspective, in the context of the overall Masterplan proposals. Importantly, we have fully addressed the concerns raised in respect of the previous refusal at the site and have developed a movement strategy that supports the sustainable development and proper planning of the area.

4.4 Flood Risk

As set out above, the Masterplan proposal is supported by a full environmental assessment, including a flood risk assessment. The Masterplan document therefore demonstrates that the entire land holding can be developed in line with the designated land use zonings, as contained within the Development Plan, without giving rise to unacceptable flood risk in relation to the proposed development or adjacent lands.

This SHD submission is also supported by a *Flood Risk Assessment*, prepared RPS, which has specific regard to proposed SHD scheme. The purpose of this assessment is to ensure that the proposed development takes full cognisance of the existing flood risk, does not result in flood risk elsewhere and provides the future residential development with the required level of flood protection in line with the relevant guidance.

As noted previously, the application site contains lands that are classified as being in Flood Zone A, B and C. A Development Management Justification Test has therefore been undertaken in respect of the application site, in line with the sequential approach set out in *The Planning System and Flood Risk Management Guidelines*.

In this regard, the *Flood Risk Assessment* concludes:

“Based on the proposed mitigation measures, consideration of the designated zoning and the proposed urban design, each of criteria in the Development Management Justification Test was shown to be satisfied. Therefore it was concluded that the proposed development complies with the requirements of the Development



Management Justification Test and hence is compliant with 'The Planning System and Flood Risk Management Guidelines'." (page 41)

Having further regard to the proposed flood mitigation measures, the Flood Risk Assessment outlines the following:

1. *There is no reliance on the existing flood defences to provide any level of protection to the SHD area.*
2. *The proposed SHD mitigation measures are sustainable and have been developed with climate change and predicted sea level rise being fully considered. This will ensure that Limerick City and County Council will not be required to provide additional flood defence infrastructure in the future to protect the SHD site;*
3. *The entire SHD site will remain free from flooding during a 0.5% AEP Mid-Range Future Scenario event where overtopping of the existing defences occurs;*
4. *All buildings and key internal roads will be protected during a 0.5% AEP Mid-range Future Scenario event, even when a breach of the existing defences has also occurred. A total freeboard of 1m has been applied in this regard. This is a very high standard of defence.*
5. *It has been robustly demonstrated that there is no increase in flood risk, even during a breach event, to surrounding existing developments as a result of the proposed development;*
6. *A clear access and egress route for emergency vehicles can be provided to the SHD site through Log na gCapall and Greenpark Avenue, even during a breach event;*
7. *All storm drainage will be attenuated to existing run off rates and therefore will not cause capacity issues on the existing network or raise the increase of flooding elsewhere.*

Importantly, the above conclusions demonstrate that the proposed development, with the mitigation measures in place, will not result in unacceptable impact from a flood risk perspective. In addition to this, the works/ mitigation measures that have been proposed to alleviate flood risk have been subject to full assessment from an environmental perspective, as demonstrated in both the *Natura Impact Statement* and *Environmental Impact Assessment* document.

4.5 Landscape Strategy and Trees

The proposed development incorporated a high quality and appropriate landscape for future residents which has been designed to meet both recreational needs and provide an attractive visual setting. The enclosed *Landscape Design Report* provides further details of the proposed hard and soft landscaping and the child play provision.

The application submission is also supported by an *Arboricultural Impact Assessment* and associated Tree Protection Plan drawing. Following a full tree survey, the Report concludes that it is not envisaged that the arboricultural impact of the proposed development will be significant. It further notes that the proposed development provides an opportunity to plant site appropriate trees that have the potential to enhance the overall arboreal footprint and biodiversity of the site.



4.6 Archaeology and Cultural Heritage

The application site does not lie within the zone of notification for any known archaeological monument; nor does it lie within the zone of potential for the historic town of Limerick.

The enclosed *Archaeological, Architectural and Cultural Heritage Impact Assessment* notes that there are no known recorded archaeological monuments or historic buildings within the application site and no 'new' archaeological features were noted during the site inspection. It further states that the application site does not lie within with zone of potential for the historic town of Limerick.

The Assessment, however, recommends mitigation measures including archaeological test trenching to ascertain whether there are any unrecorded archaeological features lying subsurface which would otherwise be destroyed without record should the site be redeveloped. Further to this, in relation to the southern portion of the site is considered to be brownfield in nature, archaeological monitoring is proposed during construction.

We contend that the proposed mitigation measures can be implemented in full prior to the commencement of development, and during construction, should planning permission be granted.

4.7 Engineering Considerations

The application submission is supported by the enclosed *Engineering Planning Report* which addresses the aspects below. Please refer to this Report for full details.

- Foul water drainage
- Surface water drainage
- Watermain design
- Roads/ Access

The engineering assessments undertaken in respect of the proposed SHD do not identify any issues in respect of water supply, drainage or surface water management. This is further addressed in the *Environment Impact Assessment Report*.



5.0 CONCLUSION

As described in detail above and within the *Statement of Consistency*, the proposed residential development is considered compliant with local, regional and national guidance.

Further to the above, we provide some key points below which confirms the proposed development's compliance with the relevant policy and guidance and the proper planning and sustainable development of the surrounding area:

- The proposed SHD is underpinned by a comprehensive site-wide Masterplan which demonstrates that the currently proposed phase of development is part of a cohesive multi-phased development that accords with the sustainable development and proper planning of the area;
- The proposed movement strategy, which includes the provision of vehicular access onto Dock Road, ensures that the proposed development would not give rise to a detrimental traffic impact upon the local road network;
- The proposed connectivity and permeability embedded within the Masterplan proposal, and realised by the proposed SHD, facilitates the sustainable movement of future and existing residents. The provision of connections into existing residential streets provides a positive contribution to the surrounding area from a placemaking perspective;
- The proposed residential density, housing mix and building height complies with the Development Plan and national and regional guidance;
- The proposed SHD shares an acceptable relationship with existing surrounding development from a residential amenity perspective. The underpinning Masterplan proposals demonstrate that the proposed SHD is compatible with the optimal redevelopment of the wider lands.
- The proposed SHD is supported by an *Environmental Impact Assessment Report* which demonstrates that the proposed development would not give rise to likely significant impacts upon the environment.
- The supporting *Flood Risk Assessment* demonstrates that with the proposed mitigation measures in place, the application site can be redeveloped with the proposed SHD scheme without giving rise to unacceptable flood risk in relation to the proposed development or adjacent lands.

We trust that this submission is in order and look forward to written acknowledgement of receipt of this application in due course. Please revert to the undersigned with any queries arising.

Yours sincerely,

John Gannon
Director



Tom Phillips + Associates

Encl.

Cc Limerick City and County Council (6 no. copies + 1 no. digital copy)