



PLANNING STATEMENT OF CONSISTENCY

PROPOSED STRATEGIC HOUSING DEVELOPMENT (SHD) ON LANDS AT FORMER GREENPARK RACECOURSE, LIMERICK



PREPARED FOR:

VOYAGE PROPERTY LTD.
ASHBOURNE HALL
ASHBOURNE BUSINESS PARK
DOCK ROAD
LIMERICK
V94 NPEO

PREPARED BY:

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1.0 INTRODUCTION

Voyage Property Ltd. is submitting this planning application to An Bord Pleanála in respect of a Strategic Housing Development on a c.10.5 ha site located to the south-west of Limerick City Centre. 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 provide the proposed access road and facilitate bulk earthworks and sloped embankments across the SHD application site to achieve the required site formation levels from a flood protection perspective. This planning application is supported by an Environmental Impact Assessment Report (EIAR).

The 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. 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. 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.

It is however noteworthy that a planning application relating to the nursing home component of the Masterplan, located in the south-eastern corner of the lands and to the immediate south east of the proposed SHD site, is currently under consideration by Limerick City and County Council (LCCC Reg. Ref. 21/1222). This planning application submission, where necessary, has regard to the cumulative environmental impacts of the proposed SHD and the proposed nursing home development.

The proposed SHD 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.



The subject site benefits from a residential land zoning under the provisions of the *Limerick City Development Plan 2010-2016* (as varied and extended). The specific 'Zoning Objective 2A – Residential' states – “*To provide for residential development and associated uses*”. Furthermore, part of the proposed access road spans lands which are subject to 'Zoning Objective 5A – General Mixed Use' and Objective ZO.5 (C) – Neighbourhood Centres which also provide for residential use.

Thus, it is considered that given the site's locational characteristics, the proposed residential development will inherently accord with national and regional sustainable planning principles particularly in relation to the promotion of efficient forms of urban development in appropriate locations.

This document seeks to outline the site's inherent compliance with the relevant suite of national, regional and local planning guidance policies and objectives pertaining to residential development in the Limerick City area as required in respect of development proposals being submitted under the Strategic Housing Development (SHD) planning provisions.

1.1 Legislative Context

In accordance with Section 4 of the Planning and Development (Housing) and Residential Tenancies Act, 2016, the Applicant is seeking pre-application consultation with An Bord Pleanála, in respect of a proposed Strategic Housing Development (SHD) as outlined above. The subject report constitutes the Statement of Consistency in accordance with the requirements of Section (5)(b) of the Act.

1.2 Report Outline

This Statement of Consistency provides a description of the proposed development by a list of the various statutory and strategic policy documents considered.

Section 2 outlines national-level policy, encompassing the provisions of *Project Ireland 2040* and various planning and development guidelines published by the Department of Housing, Planning and Local Government, and the relevant Minister.

Section 3 focuses on regional planning policy of the Southern Region and finally, Limerick City's local planning policy is detailed in Section 4.

The Statement demonstrates consistency with the pertinent *Development Plan* (i.e. the *Limerick City Development Plan 2010-2016*), and all relevant Section 28 National Guidelines as required under Section (5)(b)(i) & (ii) of the Act. The objectives of the broader national and regional plans as they relate to the proposed development are also considered in the Statement.



Policy Documents Considered

The following policy documents have informed this Statement of Consistency:

1. *National Planning Framework (Ireland 2040 – Our Plan)*;
2. *Rebuilding Ireland: Action Plan for Housing and Homelessness (2016)*;
3. *Quality Housing for Sustainable Communities (2007)*
4. *Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (2009)*;
5. *Urban Design Manual: A Best Practice Guide (2009)*;
6. *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (March 2018)*;
7. *Urban Development and Building Heights Guidelines for Planning Authorities (December 2018)*;
8. *Childcare Facility Guidelines (2001)*;
9. Part V of the *Planning and Development Act 2000: Guidelines (2017)*;
10. *Design Manual for Urban Roads and Streets (DMURS) (2013)*;
11. *The Planning System and Flood Risk Management (2009)*;
12. *Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities (2009)*;
13. *Architectural Heritage Protection – Guidelines for Planning Authorities (2011)*;
14. *Climate Action Plan (2019)*;
15. *Southern Regional Assembly: Regional Spatial & Economic Strategy (January 2020)*;
16. *Limerick City Development Plan (2010-2016)*

The proposed development of the subject site for residential purposes is deemed to inherently accord with the overarching policies and objectives of the Southern Assembly's recently adopted *Regional Spatial and Economic Strategy (2020)*, and the *National Planning Framework*, as part of *Project Ireland 2040*.

In terms of residential density, the Applicant has also afforded full regard to the provisions of the *Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (2009)* and the *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (March 2020)*.



2.0 NATIONAL POLICY

2.1 *National Planning Framework (Ireland 2040 – Our Plan)*

The *National Planning Framework (NPF)*, published in February 2018, sets out a strategic development framework for Ireland over the period to 2040. The NPF is the Government's plan to cater for the extra one million people that will be living in Ireland, the additional two thirds of a million people working in Ireland and the half a million extra homes needed in Ireland by 2040. The Framework focuses on:

- Growing regions, their cities, towns and villages and rural fabric;
- Building more accessible urban centres of scale;
- Better outcomes for communities and the environment, through more effective and coordinated planning, investment and delivery.

As a strategic development framework, the Plan sets the long-term context for Ireland's physical development and associated progress in economic, social and environmental terms and in an island, European and global context. Project Ireland 2040 will be followed and underpinned by supporting policies and actions at sectoral, regional and local levels.

A recurring theme in the Framework is the requirement to facilitate balanced development throughout all regions of Ireland, and particularly, to accommodate significant growth in Ireland's cities other than Dublin.

Under the heading of 'Compact Growth', the NPF is:

*"Targeting a greater proportion (40%) of future housing development to happen within and close to existing built-up areas. **Making better use of under-utilised land, including 'infill' and 'brownfield' and publicly owned sites** together with higher housing and jobs densities, better serviced by existing facilities and public transport."*
[Our Emphasis]

Specifically, the NPF notes that Limerick has the potential to generate and be the focus of significant employment and housing growth to 2040. It is necessary for Limerick to further strengthen its position as the principal focus within the Region and to continue to address the legacy of regional growth having occurred outside the City area. This requires growing and diversifying the City's employment base and attracting more people to live in the City, both within the City Centre and in new, accessible green-field development areas. This means improving housing choice, supported by facilities and infrastructure.

The NPF further notes in **National Policy Objective 10**:

"There will be a presumption in favour of development that encourages more people, jobs and activity within existing urban areas, subject to development meeting appropriate planning standards and achieving targeted growth."

The proposed development at this location complies with the overarching themes of the NPF. It proposes a well-designed sustainable form of mixed-use and residential development on an



existing, underutilised site located in close proximity to high quality public transport services and a well-established social infrastructure that will contribute to the consolidation of Limerick.

The NPF provides a detailed narration on the Government's aspirations for Limerick and the Mid-West Region. The NPF states:

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

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

The NPF continues:

"A series of innovative, practical and institutional measures have been put in place to achieve this in recent years and there is evidence of a positive turnaround in terms of both population and employment growth. Limerick Regeneration, the amalgamation of Limerick City and County and most recently, the Limerick 2030 initiative, have all contributed to enhancing Limerick's growth potential. Working together with the City's third level institutions, Shannon Airport and bodies such as Shannon Development and the Shannon-Foynes Port Company, there is capacity to build on recent successes and add to the ambitious vision for Limerick."

Several of the key future growth enablers for Limerick, identified in the NPF are particularly relevant when considering the proposed development at this location. These include:

- Identifying infill and regeneration opportunities to intensify housing and employment development throughout inner suburban areas;
- Enabling enhanced opportunities for existing communities as development and diversification occurs, particularly through employment, learning and education support;
- The continued expansion of the City's third level institutions and integration with the wider City and region.¹

National Policy Objectives

The NPF outlines National Policy Objectives, which set out broader aspirations for national and regional planning. Several of these are relevant when considering the proposed development at this subject site. These include:

¹ Project Ireland 2040 - The National Planning Framework, p 51.



- **National Policy Objective 2a** – A target of half (50%) of future population and employment growth will be focused in the existing five Cities and their suburbs.
- **National Policy Objective 3b** – Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.
- **National Policy Objective 5** - Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.
- **National Policy Objective 6** - Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.
- **National Policy Objective 7** - Apply a tailored approach to urban development, that will be linked to the Rural and Urban Regeneration and Development Fund, with a particular focus on:- Dublin; the four Cities of Cork, **Limerick**, Galway and Waterford; Strengthening Ireland’s overall urban structure, ... Encouraging population growth in strong employment and service centres of all sizes, supported by employment growth; Reversing the stagnation or decline of many smaller urban centres, by identifying and establishing new roles and functions and enhancement of local infrastructure and amenities; Addressing the legacy of rapid unplanned growth, by facilitating amenities and services catch-up, jobs ... In more self-contained settlements of all sizes, supporting a continuation of balanced population and employment growth.
- **National Policy Objective 8** – To ensure that the targeted pattern of population growth of Ireland’s cities to 2040 is in accordance with the targets set out in Table 4.1.

City	Population 2016	Population Growth to 2040 ²⁷		Minimum Target Population 2040
		% Range	People	
Dublin - City and Suburbs	1,173,000	20-25%	235,000 - 293,000	1,408,000
Cork - City and Suburbs	209,000	50-60%	105,000 - 125,000	314,000
Limerick - City and Suburbs	94,000	50-60%	47,000 - 56,000	141,000
Galway - City and Suburbs	80,000	50-60%	40,000 - 48,000	120,000
Waterford - City and Suburbs	54,000	50-60%	27,000 - 32,000	81,000

- **National Policy Objective 11** - In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and



generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.

- **National Policy Objective 28** - *Plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services.*
- **National Policy Objective 35** – *Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.*

It states that the key test is meeting appropriate planning standards, which should be performance-based to ensure well-designed, high quality outcomes, rather than absolute numerical standards. Although sometimes necessary to safeguard against poor quality design, the NPF notes that planning standards should be flexibly applied in response to well-designed development proposals that can achieve urban infill and brownfield development objectives in settlements of all sizes.

The proposed development inherently complies with the overarching themes of the *National Planning Framework*, by proposing a well-designed sustainable form of residential development on a zoned, underutilised urban site located in close proximity to public transport services and a well-established social infrastructure that will contribute to the consolidation of Limerick City.

2.2 **Rebuilding Ireland: Action Plan for Housing and Homelessness (2016)**

Rebuilding Ireland was launched in 2016 with the aim of addressing ongoing supply issues for residential accommodation in Ireland. The overarching aim of the *Action Plan* is to increase the delivery of housing from its current undersupply across all tenures and to help individuals and families meet their housing needs.

The Action Plan provides a target to double the number of residential dwellings delivered annually by the construction sector and to provide 47,000 social housing units in the period up to 2021. The importance of land supply and location is a central consideration of the *Action Plan* which states that:

“Locating housing in the right place provides the opportunity for wider family and social networks to thrive, maximises access to employment opportunities and to services such as education, public transport, health and amenities, while also delivering on sustainability objectives related to efficiency in service delivery and investment provision.” [Our Emphasis]



Figure 2.2: Five Pillars of the Action Plan. Source: *Rebuilding Ireland: Action Plan for Housing and Homelessness*, 2016. Extracted by TPA, 2021.

The proposed development is located on zoned, serviced lands within close proximity to a range of amenities and services and will deliver 371 no. units in the coming years. The development is proximate to existing residential areas and employment opportunities, which is in line with the provisions of the Action Plan.

The Action Plan provides five key Pillars, which will support a range of actions to support the increased delivery of housing. The proposed development will directly respond to Pillars 2 and 3 of the Action Plan, which seek to, respectively, 'accelerate the delivery of social housing' and 'build more homes.'

- Pillar 3 of the Action Plan seeks to 'build more homes' in order to meet ongoing demand.
- Pillar 4 of the Action Plan has the objective to improve the rental sector and Pillar 5 relates to utilisation of existing housing stock.

The proposed development of 371 no. units will provide a wide mix of unit types, including apartments, duplexes and houses. It is envisaged that this unit mix will be suitable for a range of household types and needs.

The proposed development is subject to the requirements of the *Part V of the Planning and Development Act 2000 (as amended)*. Social housing provision requirements have been discussed and agreed in principle with the Housing Department in Limerick City and County Council and details of this are enclosed with this planning application submission.

We therefore conclude that the proposed development aligns with the Action Plan.



2.3 **Quality Housing for Sustainable Communities (2007)**

In February 2007, the Department of the Environment, Heritage and Local Government published a statement on housing policy, *Delivering Homes Sustaining Communities*, which set out the fundamentals of that Government's vision for housing in the coming years. The integrated package of policy initiatives identified a wide range of measures to promote better homes, better neighbourhoods and better urban spaces.

Whilst these Guidelines have been superseded in many places by national policy guidelines that have been published since, they remain the relevant standard for the design and assessment of houses in the Limerick City administrative area. The *Housing Quality Assessment* prepared by Reddy Urbanism + Architecture confirms that the houses within the proposed scheme adheres in full with the relevant numerical standards.

2.4 **Sustainable Residential Development in Urban Areas (Cities, Towns and Villages) – Guidelines for Planning Authorities (2009)**

These Guidelines provide 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. In this regard, it is considered that the subject lands comprise "Outer Suburban/Greenfield" lands given the nature and location of the site.

Section 5.11 of the Guidelines states the following regarding outer suburban/greenfield sites:

"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]

In our opinion, the proposed development – in terms of both the design and density achieved – is appropriate in this location. This is due, *inter alia*, to its suburban location and the nature of the public transport connections to the city centre and other significant employment locations.

The SHD proposal provides a net residential density of 47 units per hectare, based on the substantive development area of 7.9 ha (excluding the proposed access road and areas of overburden associated with the site earthworks and levelling).

The proposal achieves a moderate density which is considered appropriate in the context of the public transport connectivity characteristics of the site.



The proposed residential density is therefore considered to be compliant, appropriate and sustainable in the context of these Guidelines. Refer to *Planning Report* for further details relating to density.

2.5 ***Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (Dec 2020)***

These *Guidelines* seek to promote high density apartment development on residentially zoned land in appropriate locations in line with the above referenced NPF overarching policies in relation to encouraging residential development within existing urban settlements.

When applying the locational criteria set out within the Guidelines, the proposed development is considered to fall broadly 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 below to demonstrate the alignment of the application site with this category.

Apartment Guidelines Criteria	Subject lands
<p>Sites within or close to i.e. within reasonable walking distance (i.e. up to 10 minutes or 800-1,000m), of principal town or suburban centres or employment locations, that may include hospitals and third level institutions;</p>	<p>The application site is located within a 35 - 40 minute walk (c. 2,600-3,200m) depending on starting point to Limerick City Centre and a 16 -19 minute walk depending on the starting point to the Crescent Shopping Centre.</p> <p>In terms of employment locations, the closest employment location is a Third Level Institution (Mary Immaculate College) which employs 264 staff, is located within a 17-23 minute walk (c. 1,800-2,100m, depending on starting point.</p> <p>The Raheen Industrial Estate is located within a c. 40 minute walk (c. 3,300m from the subject site), via Log na gCapall with proposed pedestrian access in place.</p> <p>The University Hospital Limerick is located within a c. 30 minute walk (c. 2,220m walk), via Log na gCapall with proposed pedestrian access in place.</p>



	The Dooradoyle District Centre is located within a c. 30 min walk from the subject site (c. 2,200m), via Log na gCapall with proposed pedestrian access in place.
Sites within walking distance (i.e. between 10-15 minutes or 1,000-1,500m) of high capacity urban public transport stops (such as DART, commuter rail or Luas) or within reasonable walking distance (i.e. between 5-10 minutes or up to 1,000m) of high frequency (i.e. min 10 minute peak hour frequency) urban bus services or where such services can be provided;	The application site is located between 30-39 minutes walking distance of Limerick Train Station (c. 2,500 – 3,000m). The application site is not served by high frequency bus services.
Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) of reasonably frequent (min 15 minute peak hour frequency) urban bus services.	The nearest bus stop is the Lifford Gardens Bus Stop (towards City Centre) which is served by the 304 bus (frequency: every 15 mins and 30 min on Sundays) and the 301 bus (frequency: every 30 mins). The bus stop is located within a 10 minute walk of the application site.

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 proposed net residential density of 47 units per hectare aligns with the broad guideline provided in relation to Intermediate Urban Locations (*“will also vary, but broadly >45 dwellings per hectare net”*). The net residential density for the overall Masterplan is 50 units per hectare and therefore also aligns with the guidance for Intermediate Urban Locations.

As stated above, the proposed residential density is also in alignment with the *Sustainable Residential Development in Urban Areas (Cities, Towns and Villages) – Guidelines for Planning Authorities (2009)* which provides for densities in the region of 35-50 u/h for locations such as the subject site.

Furthermore, the Guidelines also provide new apartment design standards that supersede Development Plan provisions in relation to:

- Apartment mix;
- Internal space standards
- Dual aspect ratios;
- Floor to ceiling heights;
- Apartment to stair/lift ratios;



- Storage spaces;
- Amenity spaces including balconies and patios;
- Car parking, and
- Room dimensions.

Section 2.23 of the Guidelines note that publication of the *National Planning Framework* (NPF) has signalled a move away from rigidly applied, blanket planning standards in relation to building design, in favour of performance-based standards to ensure well-designed high-quality outcomes. In particular, numerical restrictions on building height or building separation distance that may be specified in Development Plans, should be replaced by performance criteria, appropriate to location.

In relation to car parking in Intermediate Urban Locations, the Apartment Guidelines state:

“In suburban/urban locations served by public transport or close to town centres or employment areas and particularly for housing schemes with more than 45 dwellings per hectare net (18 per acre), planning authorities must consider a reduced overall car parking standard and apply an appropriate maximum car parking standard.”

In terms of cycle parking, the Apartment Guidelines provides guidance in respect of location, quantity, design and management. From a quantity perspective, the Guidelines state the following:

“...a general minimum standard of 1 cycle storage space per bedroom shall be applied. For studio units, at least 1 cycle storage space shall be provided. Visitor cycle parking shall also be provided at a standard of 1 space per 2 residential units. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/enlargement, etc.”

As demonstrated by the *Housing Quality Assessment*, prepared by Reddy Architecture + Urbanism that accompanies this submission, the apartment and duplex components of the proposed development are in full compliance with the quantitative design standards contained within these Guidelines. The proposed houses have been designed in accordance with the standards *Quality Housing for Sustainable Communities* (2007), as required by the *Limerick City Development Plan 2010-2016*.

The proposed car parking provision has been designed in accordance with the *Limerick City Development Plan 2010-2016* standards. Full details are provided in the enclosed *Traffic and Transportation Assessment* prepared by PUNCH Consulting Engineers.

The proposed cycle parking provision has been designed in accordance with the Apartment Guidelines. For long stay cycle parking, 1 space is provided per residential unit, resulting in a total of 371 no. spaces. A further 107 no. visitor cycle parking spaces have been provided at a standard of 1 space per 2 apartment/ duplex unit.

2.6 Urban Design Manual: A Best Practice Guide (2009) (A companion document to the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas)

The above referenced Design Manual notes 12 no. criteria that should be used to facilitate assessment of planning applications and should, therefore, be used as a guide to steer best design practice for residential proposals. The figure below illustrates how the 12 no. criteria have been sequenced in a logical order and the order of the criteria reflects the prioritisation and processes that should be adopted i.e., not moving onto matters of detail until the important structural decisions have been taken.

The 12 no. criteria are subdivided into three categories: Neighbourhood, Site and Home, respectively, reflecting the sequence of spatial scales and order of priorities that is followed in a good design process. In short, the proposal’s response to the various criteria set out by the Guidelines may be summarised as follows:



Figure 2.3: Urban Design 12 Criteria. (Source: *Urban Design Manual, 2009*. Extracted by TPA, 2021.)

Context

The proposed development has been designed to positively respond to the neighbouring properties of the site, the natural topography and the provisions of the *Limerick City Development Plan (2010-2016)*. Please refer to enclosed *Design Report* and *Landscape Design*



Statement. Both of these reports outline in great detail how the surrounding, existing context was considered during the design approach to the proposed scheme.

Connections

The proposed development includes the provision of a cycle and pedestrian path from Dock Road and connecting through to Green Park Avenue and Log Na gCapall. The development therefore enhances connections to the wider area, including the South Circular Road and Ballinacurra Road area.

Inclusivity

The proposed development provides a range of residential unit types, including both houses and apartments, and unit sizes. The resultant development therefore provides a mixed and balanced community. As part of this, the development includes Part V housing which has been agreed in principle with the Planning Authority, subject to planning permission.

Further to this, high quality and functional open spaces are proposed across the site, these spaces have been designed so that they are inclusive and provide for the full range of users. In this regard, the landscaping plan includes children’s play areas, seating areas and areas for teenagers.

Variety

As stated above, a mix of housing types and sizes is proposed to cater for a variety of housing needs and create a strong and sustainable mixed and balanced community. The Tables below illustrate the proposed unit mix.

Breakdown of Residential Units by No. of Bedrooms		
Type	No.	%
1 Bed	70	19%
2 Bed	167	45%
3 Bed	124	33%
4 Bed	10	3%
Total	371	100%

Breakdown of Residential Units by Type		
	Apartments/ Duplexes	Houses
1 Bed	70	
2 Bed	130	37
3 Bed	14	110
4 Bed	0	10
Total	214	157
	58%	42%

Efficiency

The proposal will connect to and make most efficient use of existing services and infrastructure. As stated above, this application will have a net residential density of 47 units



per hectare. We contend that this is an efficient and sustainable use of the underutilised, and appropriately zoned lands and supports both the *National Planning Framework* and *Regional Spatial and Economic Strategy* objectives to consolidate development in existing urban areas in Limerick.

Distinctiveness

The proposed development is designed to respond to the existing topography of the site and successfully exploits views into and out of the site. Such views will help to create strong connections between new and existing areas of development. The proposed houses are designed around a series of landscaped areas/ character areas that will create a strong visual connection to provide positive identity and sense of place.

Layout

The proposed site layout will create a people friendly environment through the provision of a streetscape that will place pedestrians and cyclists in priority by creating permeable routes throughout the development.

Traffic speeds will be controlled by design and layout and the scheme is fully DMURS compliant, which is outlined further in Section 2.9 of this Statement and in the enclosed *DMURS Compliance Statement* prepared by PUNCH Consulting Engineers.

Public Realm

Public open space is appropriately located in the scheme and is fully accessible for all residents and visitors. All open space areas are overlooked to provide natural surveillance.

Adaptability

It is considered that all apartment types proposed in this application are designed to be adaptable and capable of catering for cross-generational use.

Privacy & Amenity

All of the proposed units enjoy dedicated and generous private open space provision (balconies and gardens), which are not unduly overlooked and therefore provide sufficient privacy for future occupiers.

The proposed ground floor apartments will be separated from the public realm by a small area of defensible space (a small front garden and/ or slight change in level) to provide a level of privacy.

The design of the proposed residential units will ensure a high standard of residential accommodation for future residents.



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 (TTA)*, prepared by PUNCH Consulting Engineers, the proposed parking provision substantially complies with the Development Plan. Refer to the TTA for full details.

Further to this, the proposed development provides 15 no. car parking spaces for the proposed childcare facility. This sits slightly below the Development Plan requirement which seeks the provision of 1 no. space per staff member and 1 no. space per 5 no. children. In Section 9.2.2 of the *Traffic and Transport Assessment*, PUNCH Consulting Engineers note that the lower childcare facility parking provision has been considered on the following basis:

- a) It is expected that the childcare facility will be generally occupied by children of the proposed development who are within walking distance of the creche.
- b) A Travel Plan will be prepared by the creche which will require the creche development to implement sustainable travel options. Lower levels of car parking provision can assist with encouraging other modes of transport.

The proposed development also provides 4 no. parking spaces dedicated for car sharing which have been developed in consultation with GoCar. GoCar have advised that one GoCar vehicle space can replace up to 20 no. private cars.

Further to this, the proposed car parking spaces for the houses will include the provision of Electric Vehicle Charging Points (EVCP) where feasible.

Cycle parking has also been provided in line with Apartment Guidelines, at one space per unit. On this basis, the proposed development provides a total of 371 no. spaces for the residential development, 107 no. residential visitor spaces and 20 no. spaces for the childcare facility.

Detailed Design

The design of the proposal has been a collaborative effort from its inception, with the various opportunities and constraints assessed by the multidisciplinary design team (incorporating architectural, landscaping, engineering, environmental, conservation, heritage and planning expertise) in an iterative manner. The proposal has also been informed by the expert inputs of the various personnel to ensure that appropriate alleviation and avoidance measures are 'designed into' the scheme from the outset.

The architecture and landscape design of the scheme will work together to make a high quality coherent scheme. We note that particular attention has been paid to the materials that are proposed for use in the public realm to ensure that the proposed spaces and streets connect effectively into the surrounding area and streets beyond.

The stated aim of the *Quality Housing for Sustainable Communities, Best Practice Guidelines for Delivering Homes Sustaining Communities, 2007* is to:

"Identify principles and criteria that are important in the design of housing and to highlight specific design features, requirements and standards that have been found, from experience, to be particularly relevant."



These Guidelines along with the Development Plan standards for housing have informed the design of the 371 no. units proposed in the scheme.

Reddy Architecture + Urbanism have enclosed a *Housing Quality Assessment* in relation to the proposed development, setting out key statistics including public and private open space provision for each residential unit type, unit sizes, heights, etc. This confirms that the proposals are compliant with the above Guidelines and Development Plan standards, as relevant/ where applicable.

Universal Design

In addition, it should be noted that the proposed scheme has been designed with the *Seven Principles of Universal Design* firmly in mind, to encourage access and use of the development regardless of age, size, ability or disability, as outlined in the National Disability Authority's "*Building for Everyone: A Universal Design Approach*" and "*Universal Design Guidelines for Homes in Ireland.*" These principles are as follows;

- *Principle 1: Equitable Use;*
- *Principle 2: Flexibility in Use;*
- *Principle 3: Simple and Intuitive Use;*
- *Principle 4: Perceptible Information;*
- *Principle 5: Tolerance for Error;*
- *Principle 6: Low Physical Effort;*
- *Principle 7: Size and Space for Approach and Use.*

This planning application submission is supported by a Preliminary Audit of the scheme which will demonstrate compliance with *Part M of the Building Regulations*. This is contained within the *Design Report* prepared Reddy Architecture + Urbanism. The scheme will be further evaluated and tested against these requirements during Detail Design Stage. An Application for a Disability Access Certificate to demonstrate compliance with Part M of the Building Regulations, will be made to the Local Authority in tandem with the lodgement of the Fire Safety Certificate Application.

2.7 *Childcare Facilities – Guidelines for Planning Authorities 2001*

The proposed development includes a 550 sq m childcare facility/ creche. Reddy Architecture + Urbanism's Dwg. No. 20133-RAU-ZZ-ZZ-DR-A-02.4000 Rev A provides architectural details of the proposed childcare facility.

The proposed childcare facility has been designed to meet the standards of *Childcare Facilities Guidelines for Planning Authorities* (June 2001) and will comprise a two storey, 550 sq m facility catering for 65 no. children and 14 no. staff. The facility has been designed to cater for



ages 0 – 6 year olds in a four classroom setting and includes a range of support facilities such as food preparation areas, sleeping / quiet rooms, store rooms, staff facilities, ancillary accommodation and associated secure play areas for children. Designated car parking provision for the facility is also provided.

Section 4.2 of the *Social Infrastructure Audit*, prepared by Tom Phillips + Associates, has regard to the potential child yield arising from the proposed development and the existing capacity in the local childcare network and confirms that the potential childcare uptake of the proposal is likely to only be 31-58 No. places. The scale of the proposed facility is therefore considered to be sufficient for the proposed development.

2.8 Part V of the Planning and Development Act 2000: Guidelines issued by the Minister for Housing, Planning, Community and Local Government under section 28 of the Planning and Development Act 2000 (2017)

This guidance document advocates consideration of Part V issues at the earliest point possible. The subject proposal is entirely consistent with the *Guidelines*, which states:

“The acquisition of units on the site of the development is the recommended option in order to advance the aim of achieving a social mix in new developments. This option should be pursued by the local authority from its earliest engagement with the developer, with a view to acquiring houses which meet its social housing requirements for that area/site.”

The proposed development is subject to the requirements of the *Part V of the Planning and Development Act 2000 (as amended)*. We have had regard to the changes to Part V arising from the commencement of the *Affordable Housing Act 2021*. On the basis that the subject lands were purchased by the Applicant in 2019, the 10% requirement continues to apply to the subject site.

Social housing provision requirements have been discussed with the Housing Department in Limerick City and County Council and Clúid Housing Association. The Housing Directorate at Limerick City and County Council has issued a letter agreeing in principle to the transfer of 37 no. units on-site to the Council. Clúid Housing Association has also issued an expression of interest in respect of acquitting the Part V units.

Please refer to the enclosed Part V proposals enclosed with this planning application.

2.9 Design Manual for Urban Roads and Streets (DMURS) (2013)

A key objective of DMURS is to achieve safe, attractive and vibrant streets by balancing the needs of all users, and prioritising alternatives to car journeys. The manual advocates a design-led approach, which takes account of both the physical and social dimensions of place and movement. The subject proposal is fully consistent with this recommended approach, and achieves a sense of place and residential amenity whilst also facilitating efficient and secure internal movement.



PUNCH Consulting Engineers have prepared the enclosed *DMURS Compliance Statement*, which confirms that the proposed development is consistent with the principles and guidance of DMURS, insofar as this applies to residential schemes.

2.10 The Planning System and Flood Risk Management (2009)

The Office of Public Works (OPW) and the Department of Environment, Heritage and Local Government (DEHLG) published *The Planning System and Flood Risk Management Guidelines for Planning Authorities*, November 2009. The *Planning Guidelines* introduce the principle of a risk-based sequential approach to managing flood risk.

A *Flood Risk Assessment*, prepared by RPS has been prepared and enclosed with this submission. As set out below, 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)

2.11 Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities (2009)

The Appropriate Assessment Guidance was published to guide compliance with the *Birds Directive, 1979* and the *Habitats Directive, 1992*.

Ecology Ireland have produced a *Natural Impact Statement* (NIS) in support of the Appropriate Assessment Process, which is enclosed with this submission. Taking into account the proposed construction mitigation measures contained within the EIAR Chapters and the Construction Environmental Management Plan (CEMP), the NIS 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.”

As set out above, we confirm that with the implementation of the proposed mitigation measures as detailed throughout this submission, the proposed development would not give rise to any significant effects on Natura 2000 sites.

2.12 Climate Action Plan (2019)

The Government’s Climate Action Plan documents a broad spectrum of potential actions which can mitigate the effects of climate change as caused by pollution and the over-exploitation of natural resources. With regard to the built environment, these measures include the rational siting of urban development, the building of compact, dense and well-



designed neighbourhoods, and the imposition of higher energy efficiency performance standards.

Energy efficiency performance is addressed primarily through the newly introduced Near Zero Energy Building (NZEB) standards, which apply to all homes built since 2019, as well as the traditional Building Energy Rating (BER system).

In line with provisions contained within the National Planning Framework, detailed above, the Climate Action Plan maintains that circa 40% of new residential development to 2040 will occur within the environmental footprint of extant built-up areas. Such measures are considered to vastly reduce carbon emission associated with new developments and promote an improved quality of life in Irish cities.

The proposed development addresses the issues of sustainability in a number of ways. The moderate density achieved in this site located in the periphery of Limerick City will contribute to the continued compact development of Limerick's existing urban areas.

Several other documents enclosed with the planning application also outline sustainable design considerations. An Energy Statement, prepared by Norman Woods, outlines the proposed energy conservation strategy for the residential properties at the proposed new development. The energy statement focuses on energy conservation and energy efficiency, in order to maximise the overall energy performance of the proposed development. Passive and active design measures are proposed including high insulation and air tightness standards for the building envelope, and energy-efficient mechanical, electrical and plumbing systems.



3.0 REGIONAL POLICY

3.1 *Regional Spatial & Economic Strategy for The Southern Region (2020)*

The RSES came into effect in January 2020, the purpose the RSES is to translate the high level objectives in the NPF into local policy objectives. The RSES provides the strategic framework to guide development in the southern region, including Limerick, Cork and Waterford City, the vision for each is set out in the Metropolitan Area Strategic Plan (MASP).

To achieve the Vision the MASP identifies a number of Guiding Principles for the sustainable development of the Limerick-Shannon Metropolitan Area including Compact sustainable growth, which aims to:

“The MASP highlights the need to increase residential density in Limerick City and Shannon through a range of measures including, reductions in vacancy, re-use of existing buildings, infill and site-based regeneration. The MASP supports the densification of Limerick City Centre, the assembly of brownfield sites for development and City Centre rejuvenation and consolidation.”

The Limerick- Shannon MASP contains the following policy objectives:

MASP Policy Objective 1 includes the following components:

“a. It is an objective to strengthen the role of the Limerick-Shannon Metropolitan Area as an international location of scale, a complement to Dublin and a primary driver of economic and population growth in the Southern Region.

b. It is an objective to promote the Limerick-Shannon Metropolitan Area as a cohesive Metropolitan Area with

(i) the City Centre as the primary location at the heart of the Metropolitan Area and Region;

(ii) compact growth and regeneration of Limerick City Centre and Suburbs;

(iii) compact growth and regeneration of Shannon (iv) active land management initiatives to deliver housing and employment locations in a sustainable, infrastructure led manner”

MASP 10 Policy Objective 10 refers to a ‘Housing and Regeneration’ and states the following:

“a. It is an objective to support the environmentally sustainable densification of Limerick City Centre, the assembly of brownfield sites for development and the regeneration and redevelopment of Limerick City and Suburbs to accommodate residential use. The MASP recognises that initiatives such as the Living City and Living Georgian City initiatives and other interventions by agencies such as the Land Development Agency (and any environmental mitigation arising from the environmental assessment of such strategies) are essential to facilitate compact growth and increased residential density in the City Centre.”

Further to this, RPO 10 of the RSES supports ‘Compact Growth in Metropolitan Areas’.



The subject site is on serviced lands in an existing built up area situated in proximity to Limerick City but considered to represent a suburban location given the nature of public transport connectivity. The proposed development which will deliver 371 no. new homes will therefore contribute to the sustainable development of Limerick City and suburbs in line with the objectives of the RSES and the Limerick-Shannon MASP.



4.0 LOCAL POLICY

4.1 *Limerick City Development Plan 2010-2016, including Limerick 2030*

The Limerick City Development Plan 2010-2016 (also referred to as the ‘Development Plan’) sets out Limerick City Council’s policies for the development of Limerick City to 2016 and beyond. The plan was amended with variations that came into effect in May 2017. As set out in the Development Plan, the vision for Limerick City is to continue to grow as the centre of economic, social and cultural development for the Mid-West Region.

Variation number 4 to the *Limerick City Development Plan 2010 – 2016*, was adopted in January 2015 and comprised of the incorporation of the *Limerick 2030 Economic and Spatial Plan* into the Plan. The Limerick 2030 Plan sets out the medium-term and long-term strategy for the development of Limerick City and County for the next 15 years.

4.1.1 *Core Strategy*

Chapter 2 of the Development Plan sets out its Core Strategy and addresses the issues of housing, employment and infrastructure.

In relation to housing, the 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.

The subject lands therefore play an instrumental role in the delivery of housing required to meet the strategic housing targets of the Core Strategy. The proposed SHD is therefore central to achieving the objectives of the Core Strategy.

4.1.2 *Housing*

Chapter 6 of the Development Plan relates to ‘Housing’ and seeks to achieve mixed, balanced and self-sustaining communities. It sets out the following relevant ‘overall objectives’:

“To ensure that a good mix of both housing and apartment types and sizes is provided to meet the needs of the likely population.”

“To encourage the development of sustainable residential neighbourhoods and the provision of high-quality accommodation.”

“To promote increased residential density where appropriate to do so.”

Policy H.3 has regard to housing mix and states:

“It is the policy of Limerick City Council to encourage the establishment of sustainable residential communities by ensuring that a mix of housing and apartment types, sizes and tenures is provided within the City.”



The text supporting this policy objective also sets out the following:

“The provision of a range of housing types and sizes in the City will increase in importance as trends show a decline in family housing and an increase in elderly and single person households.”

“Providing a good mix of house types can create neighbourhoods for people of different ages and lifestyles. Encouraging good housing mix also allows people the choice and opportunity to remain in a given area while availing of accommodation that caters to their changing needs at a particular stage of their life.”

In the context of Policy H.3, we note that the proposed development provides an excellent mix of housing types and sizes, ranging from 4 bedroom semi-detached houses to 1 bedroom apartments. We maintain that the proposed development responds to the requirement for the provision of a range of housing types and sizes as set out above.

Policy H.4 refers to residential density and states:

“It is the policy of Limerick City Council to have regard to the policies and objectives of the following Strategies and Plans:

- *Sustainable Residential Development in Urban Areas (DEHLG 2008)*
- *Urban Design Manual – A Best Practice Guide (DEHLG 2008)*
- *Quality Housing for Sustainable Communities. (DEHLG 2007)”*

Policy H.5 has regard to increased density and states:

“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.”

Policy H.6 relates to sustainable residential development and states:

“It is the policy of Limerick City Council to ensure a balance between the reasonable protection of existing residential amenities, the established character of the area, and the need to provide for sustainable residential development.”

Having regard to Policy H.4 and H.5 we note that the proposed development, from a residential density perspective, has been designed in accordance with the *Sustainable Residential Development in Urban Areas (DEHLG 2008)* guidance. As outlined in 2.4 of this Statement, taking into consideration the locational characteristics of the site in the context of the city centre and public transport accessibility and connectivity, the proposed development, at a net density of 47 units per hectare is appropriate and complies with the Guidance and therefore Policy H.4, H.5 and H.6 of the Development Plan.

4.1.3 Other Relevant Policies

Below is a list of the further Development Plan policies that are relevant to the proposed development. We maintain that the proposed development is in broad compliance with the



below and have regard to the qualitative specifics in relation to the Development Management standards and throughout the enclosed specialist reports.

Policy TR.9 relates to the Cycling & Walking and states:

“It is the policy of Limerick City Council to prioritize the provision of safe facilities for Pedestrians and Cyclists throughout the City.”

Policy LBR.8 relates to Designated Areas and Protected Species and states:

“It is the policy of Limerick City Council to apply the precautionary principle in relation to proposed development in environmentally sensitive areas to ensure all potential adverse impacts on any designated natural heritage area and any NATURA 2000 sites arising from any proposed development or land use activity are avoided, remedied or mitigated.”

Policy LBR.9 relates specifically to the River Shannon and associated waterways and states:

“It is the policy of Limerick City Council to ensure that proposals along the River Shannon and other waterways associated with the River Shannon catchment within Limerick City will achieve an appropriate balance of uses commensurate with the sensitivity of the natural environment and avoiding adverse impacts on European conservation sites and sensitive natural receptors associated with the River Shannon.”

Policy LBR.10 refers to the protected of Tree and Urban Woodlands and states:

“It is the policy of Limerick City Council:

- *To protect and maintain existing important individual and groups of trees from development risk, provide additional tree planting of native deciduous trees and other appropriate plantings through planning permissions in order to benefit local biodiversity;*
- *To strengthen the protection of trees in the City and protect tree lined settings;*
- *To preserve, maintain and increase the general tree cover in the City by extending planting at identified locations and identifying new sites suitable for the creation of small woodland areas;*
- *To make use of tree preservation orders to protect important trees or groups of trees which may be at risk;*
- *To protect and maintain existing important wetland habitats from development risk, encroachment of incompatible uses, and proposals for filling to ensure sustainability, enhancement of local biodiversity and retention of flood plain storage areas.”*

Policy LBR.14 relates to the provision of Public Open Space and states:

“It is the policy of Limerick City Council To protect, retain, improve and provide for areas of public open space for recreation and amenity purposes.”



Policy EM.1 relates to Environmental Management and states:

“It is the policy of Limerick City Council to avoid or reduce, where relevant, the negative environmental impacts of development in the City.”

Policy EM.10 refers to Waste Management and states:

“It is the policy of Limerick City Council to require Applicant/Developer at the planning stage to address the issue of waste management for both the construction phase of the development and the operational phases.”

Policy EM.17 relates to Energy Efficiency and states:

“It is the policy of Limerick City Council to encourage energy efficiency through the design of buildings, layout and orientation on site.”

Policy WS.7 refers to Sustainable Urban Drainage Systems (SUDS) and states:

“It is the policy of Limerick City Council to ensure that all new developments incorporate sustainable urban drainage systems at the application stage.”

Policy WS.8 relates to Flood Protection and states:

“It is the policy of Limerick City Council to continue to work towards reducing flooding within the City and ensure that all new development proposals comply fully with the requirements of ‘The Planning System & Flood Risk Management Guidelines for Planning Authorities’, 2009, and any additional guidance introduced during the lifetime of the Development Plan.”

Policy WS.9 relates to Flood Risk and states:

“It is the policy of Limerick City Council to ensure that development should not itself be subject to an inappropriate risk of flooding nor should it cause or exacerbate such a risk at other locations.”

As stated above, the Development Plan policies outlined are considered to be relevant to the proposed development. We maintain that the proposed development is in broad compliance with such policies and have had regard to the qualitative specifics in relation to the Development Management standards and throughout the enclosed specialist reports.

4.1.4 Area Profiles – South Circular Road/ Ballinacurra

Chapter 14 of the Development Plan outlines Limerick City Council’s key policies and objectives for suburban areas within the city.

The subject site is located in the South Circular Road/ Ballinacurra area, with respect to the subject this, the Development Plan states:



“The former Limerick Racecourse represents one of the largest remaining undeveloped bank banks in the City which when integrated with the adjacent Allendale developments represents the newest housing area in the City.”

In this area, the following specific objectives apply:

- *To protect the existing architectural heritage of the area by creating architectural conservation areas. To provide adequate public transportation infrastructure (green routes) in the area through negotiation with the stakeholders of the area;*
- *To examine means of reducing traffic congestion at peak times through more sustainable and coordinated school mobility planning;*
- *To support the continuing development of Mary Immaculate College in a manner that does not adversely impact of the amenities of the area;*
- *To seek the relocation of the Serveso Site activities out of the area. Tank Farm, Courtbrack Avenue and Grassland Fertiliser, Dock Road;*
- *To support the development of the docklands as a major employment zone in the City;*
- *To sustainably develop the Baggott Estate and the open space area in the former race course lands in a coordinated manner for recreational purposes both passive and active;*
- *To ensure that the residential amenities of those residences along the southern ring road are not adversely impacted;*
- *To ensure that the regeneration programmes do not adversely impact on the amenities of the area;*
- *To ensure an appropriate mix of uses in the area to support the primary residential function of the area these include specific supports for the population of the area;*
- ***To seek the balanced development of the existing underutilised lands in the area in particular the former racecourse lands;***
- ***To seek that the contribution of the former racecourse to the cultural and sporting history of the city is commemorated in the development of the lands;***
- *To ensure the provision of infrastructure appropriate to the needs of the area.*

We have highlighted the most relevant objectives to the subject site itself and confirm that the proposed development has been designed to comply with the above provisions, as demonstrated throughout this Statement.



4.1.5 Land Use Zoning

Chapter 15 of the Development Plan contains the Land Use Zoning Objectives for Limerick City.

The majority of the application site is subject to **Zoning Objective 2A (ZO.2(A)) – Residential:**

“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 (ZO.5(A)) – General Mixed Use:**

*“To promote the development of mixed uses that serves an area greater than its immediate catchment and to ensure the creation of a vibrant and sustainable urban area. The primary purpose of this zoning is to provide for a range of employment and related uses. Permissible uses within this zone includes general offices, conference centre, third level education, hospital, hotel, commercial leisure, cultural, **residential**, public institutions, childcare services, business and technology/research uses (including software development, commercial research and development, publishing, information technology, telemarketing, data processing and media activities), light industrial uses and in addition, local convenience stores/corner shops and community/civic uses. Residential uses are also permitted.”*

The proposed access road also incorporates land which is subject to **Zoning Objective 5C (ZO.5 (C)) – Neighbourhood Centres:**

“To protect, provide for and/or improve the retail function of neighbourhood centres and provide a focus for local services.”

*“The primary purpose of these centres is to fulfill a local shopping function, providing a mix of convenience shopping, lower order comparison shopping, and local services to **residential** and employment areas. Some of these centres need to be enhanced significantly in terms of their retail offering, mix of uses, public realm, and overall viability and vitality. Limited retail offices will be acceptable in these centres to serve local needs and are subject to restrictions on size and extent including a cap of 100m² per unit. **Residential uses are also acceptable within this zone.**”*

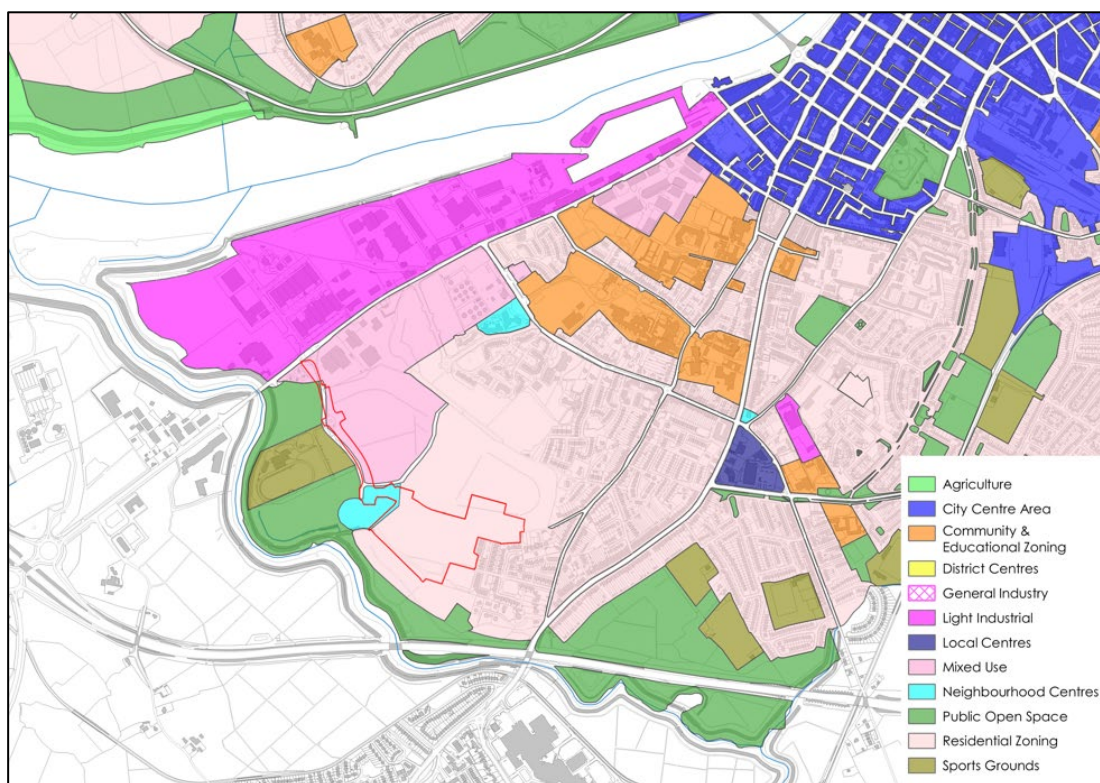


Figure 4.1 – Extract from *Limerick City Council Development Plan 2010-2016, Land Use Zone Map*, with indicative red site boundary (annotated by Reddy Architecture and Urbanism, 2021)

The proposed residential development, inclusive of the proposed access road, which is considered to be ancillary residential development on the basis that it facilitates and serves the residential development, accords with the zoning objectives attached to the land.

4.1.6 Key Development Management Standards

Density

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 on the periphery of Limerick City and constitutes a suburban location, the proposed residential net density of 47 units per hectare is considered to be appropriate and in line with the Development Plan's indicative density standard. The locational characteristics of the site in the context of residential density is further discussed in relation to national policy guidance in Section 2.4 and 2.5 of this Statement. 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.

Site Coverage

The application site is located in Zone 3 and is therefore classified by the Development Plan as a 'Suburban' location. The indicative site coverage required for such locations is 50%.

The proposed development provides a site coverage of 18.4%. This sits below the indicative site coverage of 50%. The plot ratio for the development is 0.47. The proposed development however achieves a residential density that accords with the requirements of national guidelines and falls within the density range of 35-50 units per hectare referred to by the Development Plan.

Building Heights

In relation to building height, the Development Plan recognises the need for medium and high rise buildings in order for the City to grow reach its full potential.

Whilst the proposed development does not exceed 5 storeys in height, we have had regard to the 'Special Standards Applying to Medium and High Rise Buildings'-

- *The need to create a positive urban design;*
- *The need to suitably incorporate the building into the urban grain;*
- *The need to create positive urban spaces;*
- *In view of the inevitable prominence of a high building it should be of outstanding; architectural quality, creating a building which is elegant, contemporary, stylish, and, in terms of form and profile, makes a positive contribution to the existing skyline;*
- *The need to respect important views, landmarks, prospects, roofscapes and vistas;*
- *The proposal should be very carefully related to, and not have any serious disadvantages to, its immediate surroundings, both existing and proposed, and especially to any other high buildings and prominent features in the vicinity and to existing open space;*
- *The site must be of appropriate size and context to allow for a well designed setting of lower buildings and/or landscaped open space;*
- *The design of high buildings should seek to minimise overshadowing and overlooking of surrounding property and should not create adverse micro-climatic effects (such as down-draft);*
- *The building should consider important telecommunication channels and not interfere with air navigation.*



Given the limited height of the proposed development, we note that the majority of the above does not apply to the proposal. That said, we confirm that the proposed development has been design with reference to the surrounding landscape, including the surrounding built form and the topography of the site. The *Environmental Impact Assessment Report* (EIAR) is inclusive of a Landscape and Visual Impact Assessment which confirms that the proposal would not give rise to a significant adverse impact from landscape or visual perspective.

In addition to ensuring high quality architectural design, the enclosed Daylight and Sunlight Chapter of the EIAR further confirms that the proposed development would not have an unacceptable detrimental impact upon the daylight and sunlight amenities of the existing adjacent development. We therefore contend that the proposed scale of development, including the building height is appropriate and complies with the Development Plan.

Access for all and Accessibility

As noted in Section 2.6 of this Statement, the proposed development has been screened for compliance with Part M of the Building Regulations. The *Design Report* prepared by Reddy Architecture + Urbanism includes a Preliminary Audit of the development which confirms compliance ahead of the detailed design stage.

4.1.7 Development Management – Residential Development Standards

We note that in relation to the assessment of applications for residential development, Limerick City Council have regard to the following criteria:

- Zoning and specific objectives contained in this plan and any Local Area Plan/non statutory planning guidance adopted by Council.
- Density: Higher densities should be provided in appropriate locations. Site configuration and area will have an impact on the density levels achievable.
- Quality of the proposed layout and elevations: The quality of the residential environment will be of primary significance in determining the acceptability of planning applications. Layouts, elevations, and plan form must be designed to emphasise a sense of place and community, utilising existing site features, tree coverage and an appropriate landscape structure. The design of schemes incorporating social and affordable housing shall not be built to designs that articulate social difference.
- Levels of privacy and amenity: The relationship of buildings to one another, including consideration of overlooking, sunlight/daylight standards and the use of screening devices.
- Quality of linkage and permeability to adjacent neighbourhoods and facilities and the nature of public realm/streets and spaces.
- Accessibility and traffic safety (proximity to centres and to mass transit corridors, existing and proposed).
- Quantitative Standards set out in this chapter.
- Safety and positive edges to public realm: opportunities for crime should be minimised by ensuring that public open spaces are overlooked by housing and appropriate boundary treatments applied.



- Quality of proposed public, private and communal open spaces and recreational facilities.
- Compliance with Housing policy (e.g. lifecycle provision, size, tenure, mix, etc).
- Compliance with Social and community infrastructure (e.g. childcare, local shops, etc.).
- Objectives contained in other chapters in the plan (e.g. in relation to Energy Efficiency, landscape, transport, etc.).
- Management Arrangements.
- Compliance with relevant Building Regulations.

The proposed development is in compliance with the above criteria, this is further demonstrated throughout the submission documentation and our response to the various Development Management standards within this Statement.

Public Open Space Provision

The Development Plan seeks a 15% provision of public open space on 'Greenfield sites' and 10% 'general provision' (i.e. all other sites that are not greenfield, Institutional or the setting of a building of significance).

The proposed development includes 11,511 sq m of public open space which equates to 14.6% of the c. 7.9 ha SHD development area. The subject site, which has been subject to previous development in association with its previous use as a racecourse is therefore considered to attract a requirement for 10% public open space. On this basis, we consider that the proposed 14.6% public open space provision is acceptable and in accordance with the Development Plan in this regard.

4.1.7.1 Apartment Development

The Development Plan sets out minimum standards in respect of room sizes, private open space (including balcony sizes) and storage areas within Apartment Development, including those contained within the following tables:

- Table 16.5 (Minimum Apartment Sizes)
- Table 16.6 (Minimum Room Sizes)
- Table 16.7 (Private Open Space Provision for Apartments)
- Table 16.8 (Minimum Floor Areas for Main Apartment Balconies)
- Table 16.9 (Minimum Apartment Storage Space Required)

These standards have since been superseded by the *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (2018)*.



The national Apartment Guidelines referred to above provide a number of *Specific Planning Policy Requirements (SPPRs)*, including certain minimum and maximum standards for apartment units. Where any conflict arises between an SPPR and the Development Plan, these national Guidelines supersede the Development Plan.

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.

The submission is accompanied by a *Material Contravention Statement* prepared by TPA which deals with various shortfalls in respect of the minimum standards for apartments contained within the Development Plan. Refer to the *Material Contravention Statement* for further details.

On the basis that the proposed development complies in full with the *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (2018)*, we confirm that development is acceptable in this regard.

Daylight and Sunlight and Dual Aspect

The majority of the proposed apartments and duplex units are dual and triple aspect. The *Housing Quality Assessment* prepared by Reddy Architecture and Urbanism has regard to this in further detail and confirms that the dual aspect ratio for the overall development is 76%.

The proposed development is also supported by an *Assessment of Daylight and Sunlight Access within the Proposed Development* prepared by ARC. 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 proposed development therefore complies with the Development Plan in this regard.

4.1.7.2 Housing Development

This section sets out Development Management standards in relation to the development of houses. In addition to this, the enclosed *Housing Quality Assessment* prepared by Reddy Architecture and Urbanism demonstrates that from a quality perspective, the proposed houses accord with the *Quality Housing for Sustainable Communities (2007)*. It confirms compliance of the proposed houses with these national guidelines in relation to unit and room sizes.



Dwelling Size and Housing Mix

In this regard, 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.

Private Open Space

In this regard, the Development Plan states that in all new developments, including houses, duplexes and apartment blocks, residents must have access to private/semi-private open space, which is free from unnecessary observation. The Development Plan further notes that a standard of 15 sq m of open space per bed space will normally applied.

The proposed private amenity space provided for the apartment and duplex units complies with the national Apartment Guidelines. The private amenity space provision required of apartment development by the Development Plan is addressed in Section 4.1.7.1 of this report and within the enclosed *Material Contravention Statement*.

The proposed houses are all provided with generous rear gardens ranging between 60 sq m and 130 sq m with an appropriate level of privacy. This complies with the Development Plan standard of 15 sq m per bedspace. We therefore confirm that the proposed development is acceptable in this regard. This is further detailed on Reddy Architecture + Urbanism Dwg. No. 20133-RAU-ZZ-ZZ-DR-A-02.1007 Rev A.

4.1.7.3 Naming of Residential Estates

The Development Plan states that all new street and development names shall reflect local historical, heritage or cultural associations. We confirm that the proposed neighbourhood areas within the SHD scheme have been named to reflect the former racecourse use of the site.

4.1.7.4 Childcare Facilities

As set out in Section 2.7 of this Statement, the proposed development includes the provision of a childcare facility in accordance with the *Childcare Facilities for Planning Authorities* (2001).



A 550 sq m childcare facility has been provided for within the development which is sized appropriately for 65 no. children and 14 no. staff. A *Social Infrastructure Audit*, which has regard to childcare facilities within the vicinity of the site, has also been prepared by Tom Phillips + Associates and is enclosed with the application. The Audit notes that once capacity in existing local childcare provision has been accounted for, there is likely to be a demand, arising from the proposed development, of between 31 no. and 58 no. children. The proposed childcare facility is therefore of a sufficient scale.

4.1.7.5 Recreation facilities

The Development Plan states that recreation facilities shall be included in all new residential proposals:

- *A mix of facilities can be provided on site with regard to the type of facilities which already exist in the vicinity of the proposed site and the number of units proposed by the Applicant.*
- *Agreement as to the type of recreational facility shall be provided shall be reached at the pre-planning stage.*
- *Alternative proposals for recreational facilities other than those outlined in the Recreation Matrix (Table 16.10) below are welcomed by the Planning Authority i.e. allotment development with management agreement etc.*
- *All recreation facility development shall be constructed in compliance with the relevant guidelines for same.*

The proposed development provides a number of recreational facilities as detailed in the enclosed *Landscape Report* prepared by Murray & Associates. This includes structured play elements, natural play areas and fitness station points. This presents an alternative proposal, when compared to the facilities contained in the recreation matrix (Table 16.10), that has been subject to consultation with LCCC as part of the SHD pre-application process. The proposed recreational facilities are considered to be appropriate for a residential development of the proposed scale and nature. The proposal is therefore considered to be substantially compliant with the Development Plan in this regard.

4.1.7.6 Waste Storage and Collection Standards

The Development Plan sets out a number of design considerations in respect of the provision of refuse storage to serve the proposed development. We confirm that the proposed development broadly complies with the listed considerations. The enclosed *Operational Waste Management Plan* prepared by GDG and the *Design Report* prepared by Reddy Architecture and Urbanism sets out further details of the proposal in this regard.

4.1.7.7 Traffic and Transport Assessment Guidelines

Traffic and Transport Assessment

This part of the Development Plan requires the submission of a *Traffic and Transport Assessment* for any development which would be considered to have a significant effect on travel demand and capacity of the surrounding transport links.

This planning application is accompanied by a *Traffic and Transport Assessment* prepared by PUNCH Consulting Engineers. It confirms “as demonstrated in the capacity analysis, the surrounding road network will not experience significant impact from the proposed SHD development” (page 42).

Car Parking

Table 16.1 of the Development Plan provides *General Parking Standards*; an extract showing the residential car parking standards is provided below.

PS6 - Residential			
House	1: House Unit	1: 3 Bed House & 2: 4 Bed House	2: house & 25% Visitor
Apartment	1: Apartment	1: Apartment	1:25/ Apartment & 25% Visitor
Student Accommodation Nursing Homes	1: 10 Students 1: Employee	1: 8 Students 1: Employee & 1: 4 Beds	1: 5 Students 1: Employee & 1: 2 Beds
Sheltered Accommodation (prior approval during pre-planning stage necessary)	1: Staff member	1: Staff Member	1: Staff Member & Visitor Parking
Georgian Quarter	0.5: Unit	n/a	n/a

Figure 4.2: Extract from Table 16.1 of the Development Plan showing the car parking standards applicable to residential development in ‘Zone 3 Suburban’ locations.

The proposed development includes 510 no. car parking spaces (including accessible 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 Statement*, the proposed parking provision substantially complies with the Development Plan minimum standards for ‘Zone 3 Suburban’ locations.

Further to this, the proposed development provides 15 no. car parking spaces for the proposed childcare facility. This sits slightly below the Development Plan requirement which seeks the provision of 1 no. space per staff member and 1 no. space per 5 no. children. In Section 9.2.2 of the *Traffic and Transport Assessment*, PUNCH Consulting Engineers note that the lower childcare facility parking provision has been considered on the following basis:

- a) It is expected that the childcare facility will be generally occupied by children of the proposed development who are within walking distance of the creche.



- b) A Travel Plan will be prepared by the creche which will require the creche development to implement sustainable travel options. Lower levels of car parking provision can assist with encouraging other modes of transport.

The proposed development also provides 4 no. parking spaces dedicated for car sharing which have been developed in consultation with GoCar. GoCar have advised that one GoCar vehicle space can replace up to 20 no. private cars.

Further to this, the proposed car parking spaces for the houses will include the provision of Electric Vehicle Charging Points (EVCP) where feasible.

Cycle Parking

Table 16.2 of the Development Plan provides *General Parking Standards*; an extract showing the residential cycle parking standards is provided below.

Category	1:10 Students	1:10 Students
CPS6 - Residential		
House	1: House Unit	1: House Unit
Apartment	1: Apartment	1: Apartment
Student Accommodation	1: 10 Students	1: 10 Students
Nursing Homes	1: 10 Employees	1: 10 Employee
Sheltered Accommodation	1: 5 Employees	1: 5 Employees

Figure 4.3: Extract from Table 16.2 of the Development Plan showing the cycle parking standards applicable to residential development in 'Zone 2 and 3 Outer Core/ Suburban' locations.

As also set out in Section 9.2.2 of the *Traffic and Transportation Assessment*, the proposed development includes 371 no. long stay cycle parking spaces for residents. This accords with the Development Plan standards for 'Zone 2 and 3 Outer Core/ Suburban' locations. The proposal also provides 107 no. short stay/ visitor spaces for the apartment/ duplex units in line with the Apartment Guidelines.

Having regard to the above, we conclude that the proposed development from a traffic and transport perspective is substantially in line with the Development Plan.

4.1.7.8 Flood Risk Analysis

The Development Plan states that all development applications that are proposed in an area where flood risk is identified shall contain the specified information.

The proposed development has been designed in order to mitigate any potential flood risk. The enclosed *Flood Risk Assessment* prepared by RPS provides full details in this regard. On the basis of the enclosed Flood Risk Assessment, we confirm that the proposed development is compliant with the Development Plan in this regard.



4.1.7.9 Water, Waste Water and Surface Water

The Development Plan sets out a series of requirements in respect of site infrastructure required to serve a proposed residential development.

The enclosed *Engineering Planning Report* prepared by PUNCH Consulting Engineers provides full details in this regard on which basis we consider the proposed development to be compliant with the Development Plan.



5.0 CONCLUSION

In summary, the proposed development will provide for 371 no. residential units on strategically important underutilised, serviced and residentially zoned urban lands in the periphery of Limerick City.

Having regard to the policies and standards prescribed at local level, and the rationale for the nature of the proposal as discussed above, it is considered that the proposed development represents the proper planning and sustainable development of the subject site. The proposed development will create a variety of housing types and sizes in a high-quality landscaped setting at a residential density that accords with national, regional and local policy.

We contend that the proposed development is fully in accordance with the following national and local policy documents:

1. *National Planning Framework (Ireland 2040 – Our Plan)*;
2. *Quality Housing for Sustainable Communities (2007)*
3. *Rebuilding Ireland: Action Plan for Housing and Homelessness (2016)*;
4. *Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (2009)*;
5. *Urban Design Manual: A Best Practice Guide (2009)*;
6. *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (March 2018)*;
7. *Urban Development and Building Heights Guidelines for Planning Authorities (December 2018)*;
8. *Childcare Facility Guidelines (2001)*;
9. *Part V of the Planning and Development Act 2000: Guidelines (2017)*;
10. *Design Manual for Urban Roads and Streets (DMURS) (2013)*;
11. *The Planning System and Flood Risk Management (2009)*;
12. *Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities (2009)*;
13. *Architectural Heritage Protection – Guidelines for Planning Authorities (2011)*;
14. *Climate Action Plan (2019)*;
15. *Southern Regional Assembly: Regional Spatial & Economic Strategy (January 2020)*;
16. *Limerick City Development Plan (2010-2016)*.

In conclusion, we submit that the development of this site, as per the enclosed plans and particulars, is fully in accordance with the proper planning and sustainable development of the area.

Yours sincerely

John Gannon
Director
Tom Phillips + Associates