



# RESPONSE TO AN BORD PLEANÁLA OPINION

In respect of

**PROPOSED STRATEGIC HOUSING DEVELOPMENT ON LANDS AT THE  
FORMER GREENPARK RACECOURSE, DOCK ROAD, LIMERICK**

Prepared on behalf of

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## 1.0 INTRODUCTION

This Response document addresses issues raised by An Bord Pleanála (ABP) in its *Opinion* issued to the Applicant on 24<sup>th</sup> June 2021, on foot of the Pre-Application Consultation stage of the subject SHD Application (ABP Ref. 310233-21).

Specifically, it outlines how the Applicant has addressed the issues highlighted in ABP's *Notice of Pre-Application Consultation Opinion* (the 'Opinion') of June 2021. (Appendix A.) (See Section 2.0.)

In addition, pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the Board notified the prospective applicant that in addition to the 3 No. issues highlighted in the Board's Opinion, other specific information should be submitted. This is detailed in Section 3 of this Response.



Figure 1.1: Extract from Proposed *Site Plan*. (Source: ZZ-ZZ-DR-A-02.1004 Rev A by Reddy Architecture + Urbanism.)



## 2.0 RESPONSE TO ISSUES RAISED BY AN BORD PLEANÁLA

In its Opinion issued on 24 June 2021 (ABP Ref. 310233-21), the Board stated that some 3 No. issues needed to be addressed in the documents submitted in order for a future application to constitute a reasonable basis for an application for strategic housing development. The Board also set out a list of specific information that should be submitted with any application for permission. This is addressed later on in this Response.

The issues raised in ABP's Opinion are as follows:

1. Residential Density and Housing Mix
2. Design and Layout of Development
3. Roads, Pedestrian and Cycle Connectivity

### 2.1 ABP Issue No.1 – Residential Density and Housing Mix

The Board states:

*“Further consideration / justification of the documents as they relate to the issues of residential density and housing mix, with regard to the following matters:*

- *The status of lands as one of largest remaining undeveloped land banks in Limerick City;*
- *The strategic importance of the site in context of national planning policy pertaining to compact growth; and, specifically, National Planning Objectives NPO 2a, NPO 3b, NPO 7, NPO8 regarding the development of Ireland's existing cities; NPO 5 regarding the development of cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity and NPO 35 to increase residential density in settlements, as set out in the National Planning Framework.*
- *National planning policy on residential development as set out in the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities and the Design Standards for New Apartments Guidelines for Planning Authorities.*
- *Table 2.4 of the Core Strategy of the Limerick City development Plan 2010-2016 (as varied), which identifies the Racecourse lands (36 ha) as having capacity for 1,188 no. residential units, also the objectives for the Racecourse lands set out in the Development Plan Chapter 14.*
- *The accessible location of the site close to Limerick City Centre, Mary Immaculate College, Dooradoyle District Centre and employment zones such as the Raheen Industrial Estate and University Hospital Limerick campus;*



- *The availability of existing and proposed roads, pedestrian, cycle and public transport infrastructure in the vicinity of the site, in the context of the draft Limerick Shannon Metropolitan Area Transport Strategy (LSMATS).*

*The further consideration of this issue may require an amendment to the documents and/or design rationale submitted.”*

### 2.1.1 Applicant’s Response

Having regard to the above points, further design development has been conducted since the Tripartite Meeting to ensure that the proposed development complies with the national policy objectives surrounding density and compact growth and the Core Strategy of the Limerick City Development Plan in regard to the strategic importance of the lands from a housing delivery perspective.

The design of scheme has been amended to take into account of its strategic location and proximity and availability to the existing and proposed roads, pedestrian, cycle and public transport infrastructure in the vicinity of the site.

The pre-application scheme comprised 287 no. residential units, including 139 no. houses, 96 no. duplexes and 52 no. apartments. This scheme had an overall net residential density of 41 units per hectare.

The current, final, SHD scheme comprises 371 no. residential units, including 157 no. houses, 76 no. duplexes and 138 no. apartments. The net residential density for the proposed scheme is 47 units per hectare. The housing mix consists of the following:

Unit Mix	1 bed	2 bed	3 bed	4 bed	Total
Houses	0	37	110	10	157
Duplexes	24	38	14	0	76
Apartment	46	92	0	0	138
	70	167	124	10	371

In our opinion, the revised housing mix and increased residential density result in a policy compliant scheme, having regard to the relevant national, regional and local planning policy. The enclosed *Statement of Consistency*, prepared by Tom Phillips + Associates demonstrates compliance with, *inter alia*, the following policies that were identified by the Inspector in the Board’s Opinion:

Policy	Relevant Section of Statement of Consistency
National Policy Objective 2a of the NPF (2018)	Section 2.1
National Policy Objective 3b of the NPF (2018)	Section 2.1
National Policy Objective 5 of the NPF (2018)	Section 2.1
National Policy Objective 7 of the NPF (2018)	Section 2.1
National Policy Objective 8 of the NPF (2018)	Section 2.1
National Policy Objective 35 of the NPF (2018)	Section 2.1
Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities and the Design Standards for New Apartments Guidelines for Planning Authorities.	Section 2.5
Chapter 2 (Core Strategy) of the Limerick City Development Plan 2010-2016	Section 4.1.1



Chapter 14 of Limerick City Development Plan 2010-2016

Section 4.1.4

As noted above, Section 2.5 of the *Statement of Consistency* provides an assessment of the proposed SHD scheme against the *Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities and the Design Standards for New Apartments Guidelines for Planning Authorities (2018)*, having regard to the locational characteristics of the site (including connectivity to the destinations referred to by the Inspector in the Board's Opinion).

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).."*

The proposed net residential density of 47 units per hectare and housing mix which comprises 58% apartment development (including duplex units), therefore aligns with the broad guideline provided in relation to Intermediate locations (>45 dwellings per hectare net).

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.

In conclusion, the final SHD scheme is considered to fully respond to Issue No. 1 of the Board's Opinion and achieves a moderate density and housing mix that is appropriate in the context of the public transport connectivity characteristics of the site.

## 2.2 ABP Issue No. 2 – Design and Layout of Development

The Board requires:

*"Further consideration/justification of the documents as they relate to the design and layout of residential development. The prospective applicant should satisfy themselves that the proposed design and layout provide the optimal urban design and architectural solution for this site and are of sufficient quality to ensure that the proposed development makes a positive contribution to the character of the area over the long term. In this regard, the submitted documents should allow for particular consideration of the following matters.*

*The development shall comprise separate Character Areas, with an integrated hierarchy of public open spaces at accessible, well overlooked locations throughout the site. The public open spaces shall address specific functions such as active / passive open spaces and play areas. The Character Areas shall include a consistent approach to (i) the design and finish of houses / apartment buildings; (ii) roads and footpaths layout materials and finishes; (iii) hard and soft landscaping and tree retention (where proposed); (iv) biodiversity enhancement measures; (v) relevant SuDS measures.*





*Details of the proposed development shall be provided in the context of any other current proposals for adjacent developments within the Racecourse lands, such as the nursing home to the south east of the development site, also the development permitted to the north east of the proposed development site under Reg. Ref. 17/1190 ABP-302015-18.*

*The associated provision of a public lighting scheme, to the satisfaction of the planning authority.*

*The further consideration of these issues may require an amendment to the documents and/or design proposals submitted relating to design and layout of the proposed development.”*

In order to fully address the above, the response is broken down to demonstrate that the following issues have been addressed:

- a) The provision of Character Areas;
- b) An integrated hierarchy of public open spaces that are accessible and well overlooked;
- c) The provision of public open spaces which address specific functions such as active/ passive and play areas;
- d) A consistent approach to the following in each Character Area:
  - i. The design and finish of houses/ apartment buildings;
  - ii. Roads and footpaths layout materials and finishes;
  - iii. Hard and soft landscaping and tree retention (where proposed);
  - iv. Biodiversity enhancement measures;
  - v. Relevant SuDS measures.
- e) The provision of the details of the proposed development in the context of other proposals for adjacent developments within the Racecourse lands and immediately adjoining lands.
- f) The provision of a public lighting scheme to satisfaction of Limerick City and County Council.

## **2.2.1 Applicant's Response**

### **(a) The provision of Character Areas**

The proposed SHD scheme has been broken down into series of Character Areas/ Neighbourhood Areas. This is shown on Reddy Architecture + Urbanism's Dwg. No. 20133-RAU-ZZ-ZZ-DR-A-02.1005 Rev A and pages 37-40 of the enclosed *Design Report* which sets out the design rationale for each character area. These include:

- Neighbourhood/ Character Area 1: Greenpark Road
- Neighbourhood/ Character Area 2: Greenpark Road Upper
- Neighbourhood/ Character Area 3: The Paddocks
- Neighbourhood/ Character Area 4: The Gallops



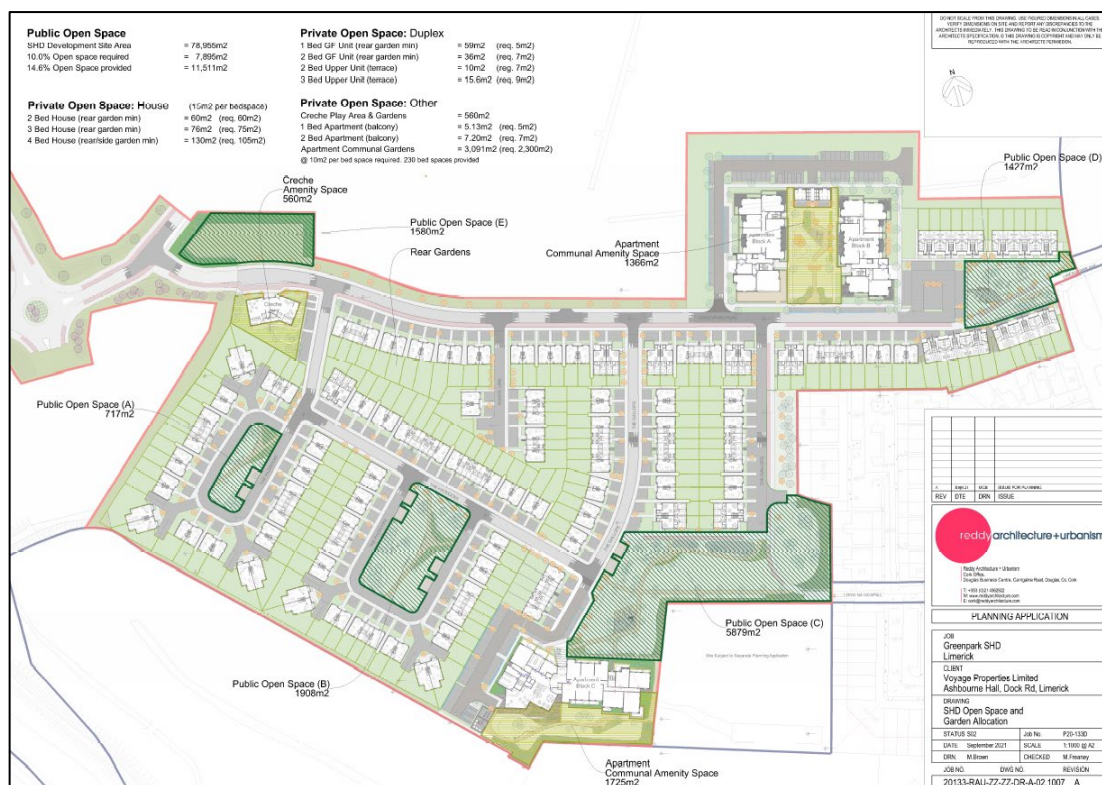


Figure 2.1: Site Plan showing proposed Neighbourhood Areas (Source: Reddy Architecture + Urbanism)

**(b) An integrated hierarchy of public open spaces that are accessible and well overlooked;**

The proposed SHD scheme includes a total of 11,511 sq m of public open space, amounting to 14.6% of the net residential area which has been integrated into each of the Neighbourhood/ Character Areas.

Reddy Architecture + Urbanism's Dwg. No. 20133-RAU-ZZ-ZZ-DR-A-02.1007 Rev A '*SHD Open Space and Garden Allocation*' provides an overview of the proposed public open space and demonstrates that the spaces are accessible and well overlooked by the proposed residential units. The open spaces are accessible from both the pedestrian and cyclist access points proposed and the main site entrance via the proposed access road which connects to Dock Road.



**Figure 2.2: Extract from Reddy Architecture + Urbanism’s Dwg. No. 20133-RAU-ZZ-ZZ-DR-Z-02.1007 Rev A ‘SHD Open Space and Garden Allocation’**

Page 6 of the enclosed *Landscape Design Report* prepared by Murray & Associates also illustrates the proposed public open spaces and presents them in the context of the communal and play space also provided by the scheme. Page 7 of the same report further illustrates the arrangement of the proposed public open spaces in the context of each character area.

**(c) The provision of public open spaces which address specific functions such as active/passive and play areas;**

As set out on page 6 of the enclosed *Landscape Design Report*, the open spaces within the development contain both active and passive uses, including play and recreation provision. In this report, Murray & Associates state:

*“Active uses are centred around the play spaces which utilise both natural and formal play elements, Outdoor Gym Fitness equipment is also used within larger public open space.*

*Passive elements include areas for informal kickabouts, grassed mounds for play and incidental natural play elements at various locations within all open spaces.*

*These informal play elements include locally sourced boulders for seating and climbing, logs for balance, grassed slopes and the creation of enclosures to aid imaginative play.*

*Natural play elements are included within the defined play areas and are also within the wider scheme at appropriate locations. This dispersal of play and activity throughout the open space allows the whole landscape to be seen as an opportunity for play and activity.” (page 6)*



Page 9 and 10 of the *Landscape Design Report* has further regard to play and recreation, it states:

*“The play spaces and recreational elements within the development have been distributed to allow future residents and visitors to enjoy easy and direct access to the various facilities.*

*The play areas are envisaged, in part, as being ‘Natural Play’ areas with the inclusion of elements of formal play equipment as required.*

*The ‘Ready, Steady, Play!’ national play policy from the Department of Children, Equality, Disability, Integration and Youth (2019) should be consulted when detailed design of play spaces is considered.*

*Facilities to include:*

- *Local Areas for Play (LAP)*
  - *catering for children up to 6 years;*
- *Local Equipped Areas for Play (LEAP)*
  - *within a five minute walk of residential area;*
  - *some formal equipment within 5 minutes walk;*
  - *equipped for early school age children.”*

Refer to the enclosed *Landscape Design Report* prepared by Murray & Associates for full details.

**(d) A consistent approach to the following in each Character Area: (i) The design and finish of houses/ apartment buildings; (ii) Roads and footpaths layout materials and finishes; (ii) Hard and soft landscaping and tree retention (where proposed); (iii) Biodiversity enhancement measures; and (iv) Relevant SuDS measures.**

#### **(i) The design and finish of houses/ apartment buildings**

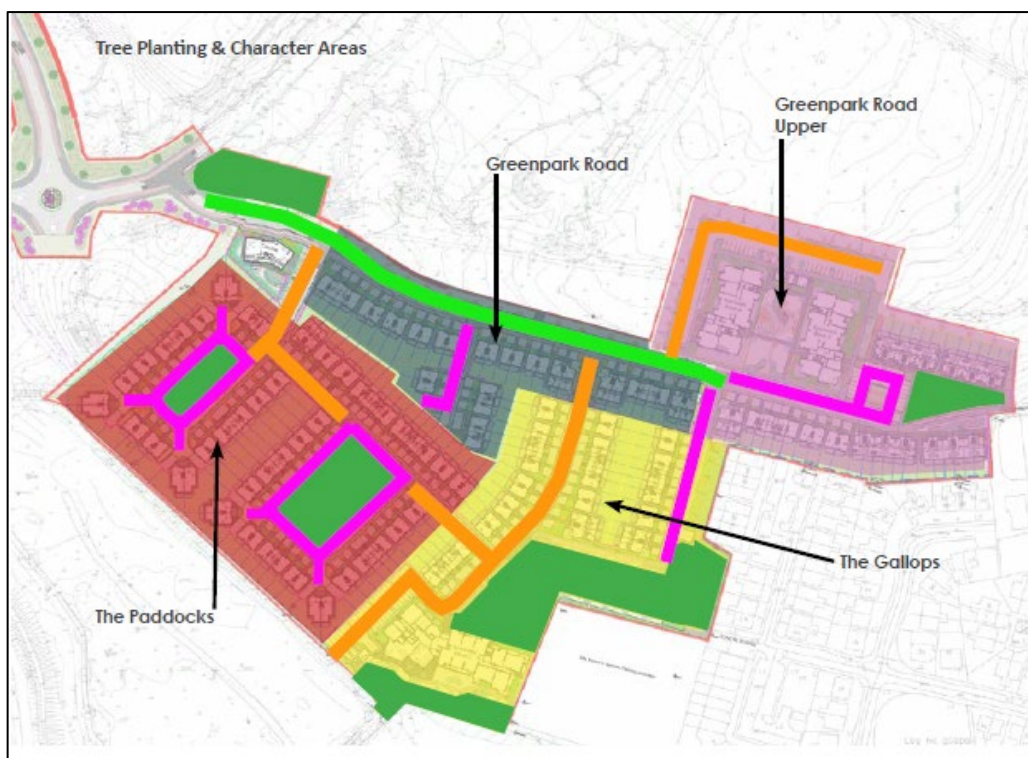
As detailed in the enclosed *Design Report* and *Materials and Finishes Report*, prepared by Reddy Architecture + Urbanism, the design and materiality of the proposed buildings is integrated with the proposed Neighbourhood Areas/ Character Areas.

Each character area will have its own specific identity through the choice of difference brick colours and textures, scales and architectural treatments. Pages 37 to 40 of the *Design Report* has specific regard to the architectural rationale for each character area and demonstrates how the design instils a sense uniformity within each character area, whilst achieving architectural distinctiveness and variety on a site wide basis.

#### **(ii) Hard and soft landscaping and tree retention**

The enclosed *Landscape Design Report*, on pages 7 and 8, has regard to proposed soft and hard landscaping. Page 7 has specific regard to tree planting in the context of the proposed character areas and demonstrates that the landscape strategy, particularly in respect to the tree planting mix, has been informed by the character areas. An extract from the *Landscape Design Report* is provided below.





<p><b>Open Spaces: 12-14cm - 16-18cm girth</b></p> <p>Quercus robur, Sorbus aucuparia, Pinus sylvestris, Sorbus aria, Salix spp, Alnus glutinosa, Betula pendula, Prunus padus, Malus sylvestris, Elm</p>	
<p><b>Link Roads: 16-18cm girth</b></p> <p>Tilia cordata 'Greenspire', Platanus orientalis 'Minaret'</p>	
<p><b>Local Roads: 14-16cm girth</b></p> <p>Alnus glutinosa, Betula pubescens, Sorbus aucuparia, Carpinus Betulus</p>	
<p><b>Small Residential Streets/Homezones: 12-14cm - 14-16cm girth</b></p> <p>Corylus avellana, Prunus avium, Pyrus 'Chanticleer', Malus sylvestris, Betula pendula, Amelanchier lamarckii</p>	

Figure 2.3: Extract from Page 7 of Murray & Associates Landscape Design Report showing the arrangement of the proposed.

For the proposed hard landscaping, a simple and robust palette of materials is proposed. In this regard, Murray & Associates state:

*“The paving materials are arranged to reflect the various changes in use and identity of the proposed public realm, while allowing a coherent and consistent treatment over the site. This creates a strong and integrated urban identity for the development. Proposed paving is generally within a buff to light brown colour range, with various darker colours used sparingly for contrast. Specific areas within the development are further defined by the use of various paving sizes, layout and colour.” (page 8)*

Refer to Murray & Associates Dwg. Nos. 1835\_PL\_P\_01 Rev D and 1835\_PL\_P\_02 Rev E for full details.



### (iii) Biodiversity enhancement measures

In addition to the proposed insect hotel and planting which includes native species referred to on Dwg. No. 1835\_PL\_P\_02 Rev A 'Landscape Masterplan' prepared by Murray & Associates, the Biodiversity Chapter (Chapter 8) of the EIAR proposes a number of biodiversity enhancement measures. These include 20 no. bat and bird boxes.

### (iv) Relevant SuDS measures

The following SuDS measures are incorporated into the proposed development. Rather than being specific to each character area, the proposed SuDS measures are part of a site wide strategy.

- Infiltration trenches
- Swale drainage
- Green roofs
- Permeable paving
- Tree pits
- Rain gardens
- Attenuation tanks

The following PUNCH Consulting Engineers drawings illustrate the arrangement of the proposed SuDS measures across the site:

- Dwg. No. 191325-PUNCH-XX-XX-DR-C-0150 Rev. PLO 'SUDs Details (Sheet 1 of 3)'
- Dwg. No. 191325-PUNCH-XX-XX-DR-C-0151 Rev. PLO 'SUDs Details (Sheet 2 of 3)'
- Dwg. No. 191325-PUNCH-XX-XX-DR-C-0152 Rev. PLO 'SUDs Details (Sheet 3 of 3)'

The above referenced drawings demonstrate that a consistent approach has been taken in respect of SuDS across the SHD proposal. Refer to the drawings and the enclosed *Engineering Planning Report* prepared by PUNCH Consulting Engineers for further details.

## 2.3 ABP Issue No. 3 – Roads, Pedestrian and Cycle Connectivity

The Board requires:

*“Further consideration of the documents as they relate to road / pedestrian / cycle connectivity to South Circular Road via adjacent residential areas to the north and east of the site, to include the capacity of existing roads, pedestrian and cycle infrastructure at these locations, as well as the potential cumulative impacts of the development of adjacent sites within the overall Racecourse lands in the context of the proposed Masterplan and any current proposals to develop adjacent sites within the Masterplan area, also the development permitted Reg. Ref. 17/1190 ABP-302015-18. The prospective applicant is also advised to consider connectivity to adjoining development sites within the Masterplan lands and to potential future connectivity to the lands owned by Limerick City and County Council to the south of the development site. The following matters should also be taken into consideration:*



- *The draft Limerick Shannon Metropolitan Area Transport Strategy, including proposals for roads, pedestrian, cycle and public transport infrastructure in the area;*
- *The prospective applicant is advised to liaise with the planning authority regarding connectivity to Council lands to the south of the development site. They should at a minimum not preclude any future connections to adjoining lands;*
- *Existing and proposed roads levels with regard to the SSFRA.*

*The further consideration of these issues may require an amendment to the documents and/or design proposals submitted relating to design and layout of the proposed development.”*

### 2.3.1 Applicant’s Response

This planning submission is accompanied by a *Traffic and Transportation Assessment (TTA)*, prepared by PUNCH Consulting Engineers.

This report has regard to the capacity of the road network and all relevant infrastructure, including pedestrian and cycle infrastructure and connectivity, in both the existing and proposed situations. In addition to considering the potential impact of the proposed SHD upon the surrounding area, the TTA has regard to the cumulative impact arising from the proposed development in combination with the future masterplan phases. The TTA, and EIAR, also consider the impact of the proposed development in combination with the permitted development at Greenpark Avenue (LCCC Reg. Ref. 17/1190 (ABP-302015-18) and the recently submitted nursing home application submitted to LCCC by the Applicant for the south eastern portion of the former racecourse lands (LCCC Reg. Ref. 21/1222) which also forms part of the site wide masterplan.

In the TTA, PUNCH Consulting Engineers also refer to the *draft Limerick Shannon Metropolitan Area Transport Strategy* and have integrated it into the assessment where appropriate.

#### ***Connectivity between SHD site and adjoining development***

In respect to connectivity into adjoining sites, the development provides cycle lane and footpath connectivity through the site, facilitating links between the subject site and Dock Road and South Circular Road. Pedestrian and cyclist access is also proposed at the boundary between the site and Log na gCapall and Greenpark Avenue. Vehicular access is provided via the proposed access road which connects into Dock Road.

The enclosed *Design Report*, prepared by Reddy Architecture + Urbanism, also addresses the proposed movement strategy and provides an overview of the cyclist and pedestrian routes through the site and the connectivity achieved with the surrounding area in diagrammatic form. The relevant extracts are included below.

The *Design Report* and *Traffic and Transportation Assessment* should be referred to for full details.

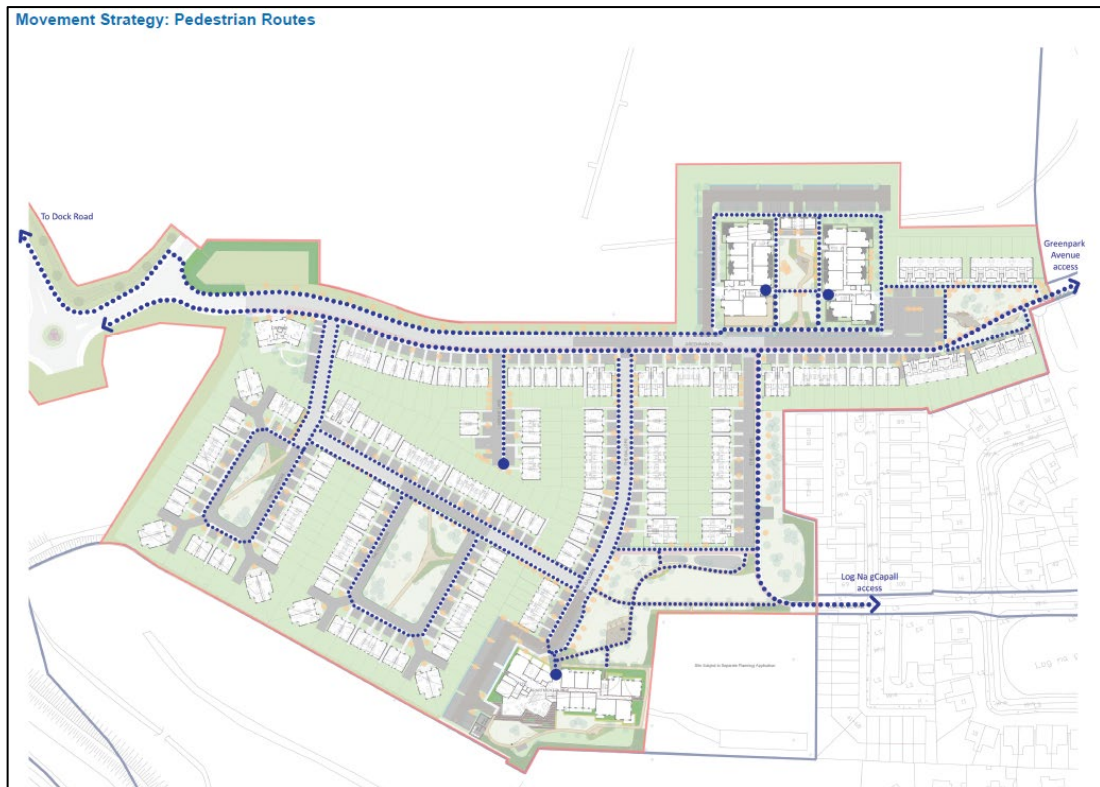


Figure 2.4: Extract from Reddy Architecture and Urbanism's *Design Report* (page 24) showing the pedestrian routes through the proposed SHD and connection into adjoining development.



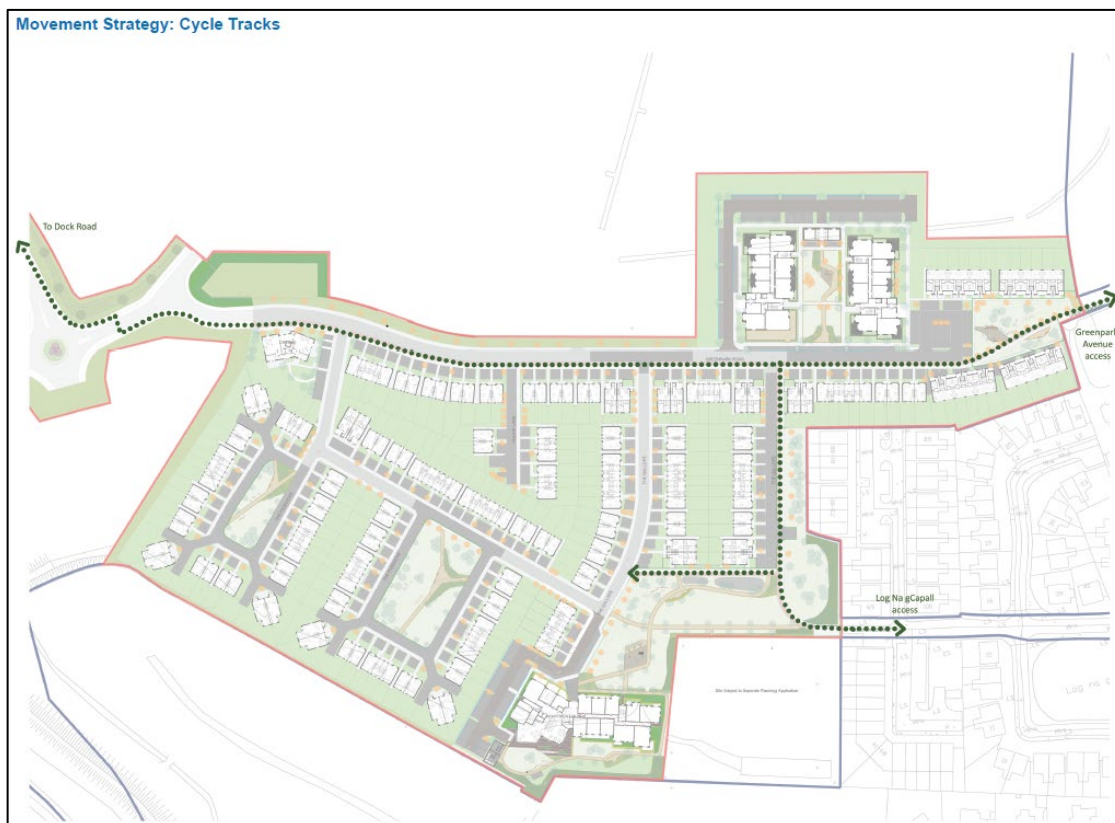
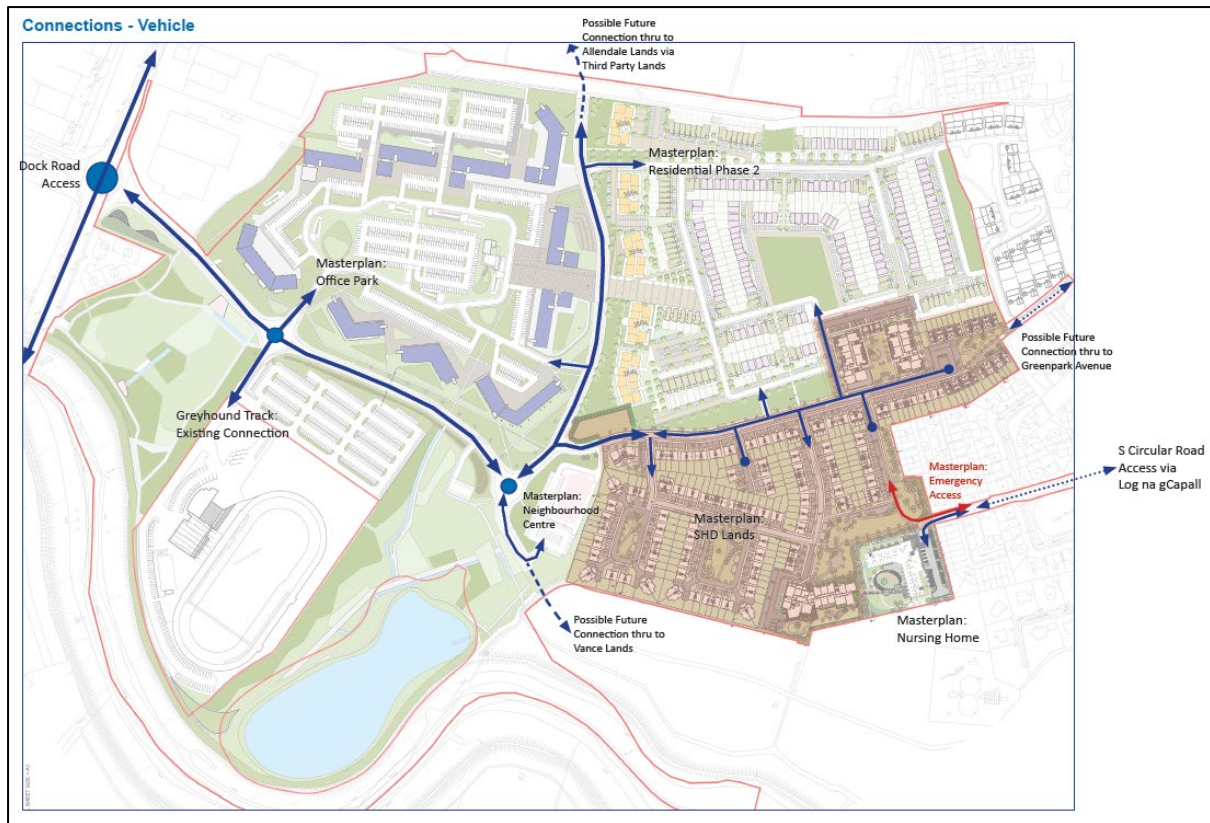


Figure 2.5: Extract from Reddy Architecture and Urbanism’s Design Report (page 25) showing the cycle routes through the proposed SHD site and connection into adjoining development.

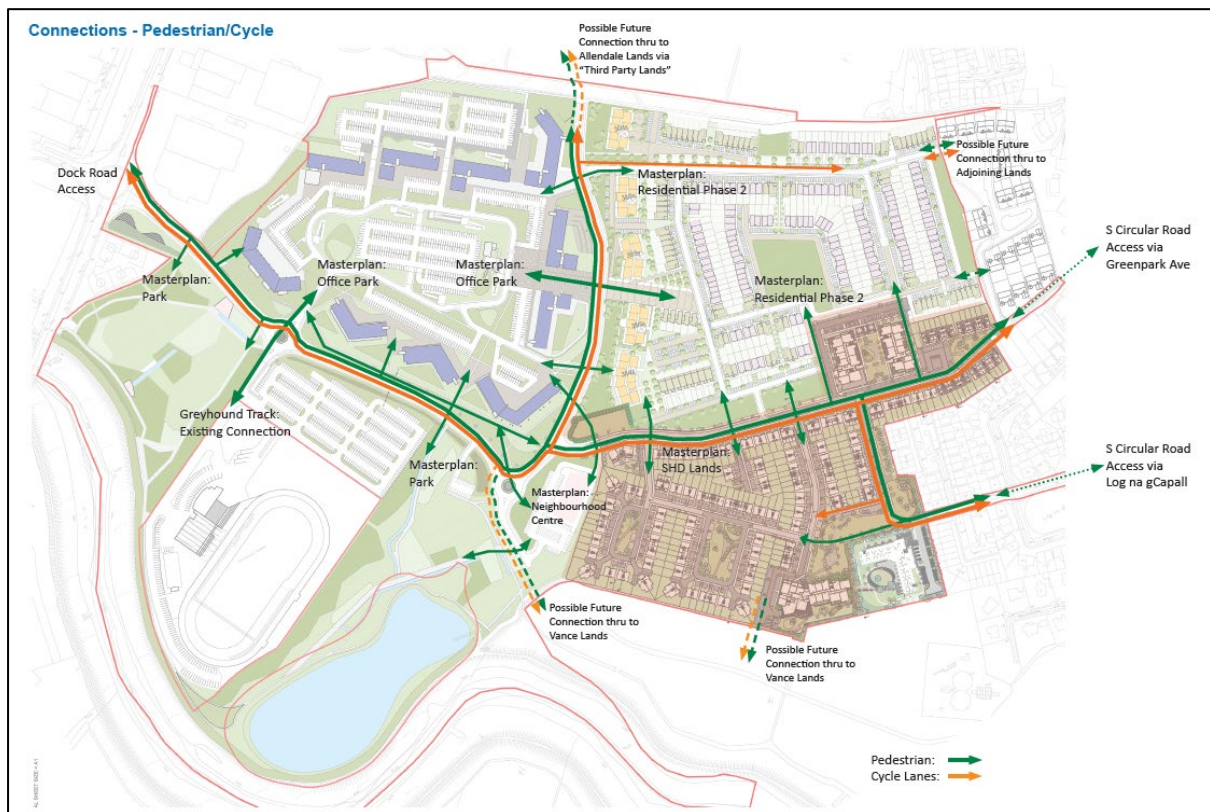
### ***Potential future connectivity with adjoining Masterplan lands***

The *Design Report* also provides an overview of the proposed connectivity and linkages across the whole Masterplan area. As well as the proposed access road that connects into Dock Road, this includes potential future vehicular connectivity with Alandale lands to the north and the Council owned lands (‘Vance lands’) to the south.

In terms of cycle and pedestrian connectivity, the Masterplan provides for multiple routes across the masterplan and into surrounding adjoining development/ land to the north, south, east and west.



**Figure 2.6:** Extract from Reddy Architecture + Urbanism’s *Design Report* (page 8) showing indicative vehicular connectivity across Masterplan lands and adjoining development.



**Figure 2.7:** Extract from Reddy Architecture + Urbanism’s *Design Report* (page 9) showing indicative cyclist and pedestrian connectivity across Masterplan lands and adjoining development.



### Potential future connection to Council lands to the South

Following the Tripartite meeting, the Project Engineer liaised with the Roads Department at Limerick City and County Council in respect of a potential future connection into the Council lands (also known as the Vance lands) to the south of the subject site. The below extract from the Masterplan vehicular connections diagram provided within the *Design Report* illustrates the agreed indicative connection between the Masterplan lands and the Council owned lands to the south.



Figure 2.8: Extract from Reddy Architecture + Urbanism’s *Design Report* (page 8) showing indicative potential future vehicular connectivity with Council owned lands to the south.



Figure 2.9: Extract from Reddy Architecture + Urbanism’s *Design Report* (page 8) showing indicative potential future pedestrian and cyclist connectivity with Council owned lands to the south.

Reddy Architecture + Urbanism's Dwg. No. ZZ-ZZ-DR-A-02.1003 Rev A *'Proposed Site Plan sht 1'* shows the proposed access road which provides for a future access road from the roundabout at the entrance to the SHD area. This would facilitate future access to the Neighbourhood Centre (part of site-wide Masterplan) and the Council owned lands further to the south, should they come forward for redevelopment.

This connection allows for future vehicular, cycle and pedestrian access to the Council lands and ensures that the proposed development would not preclude the optimal redevelopment of these lands.

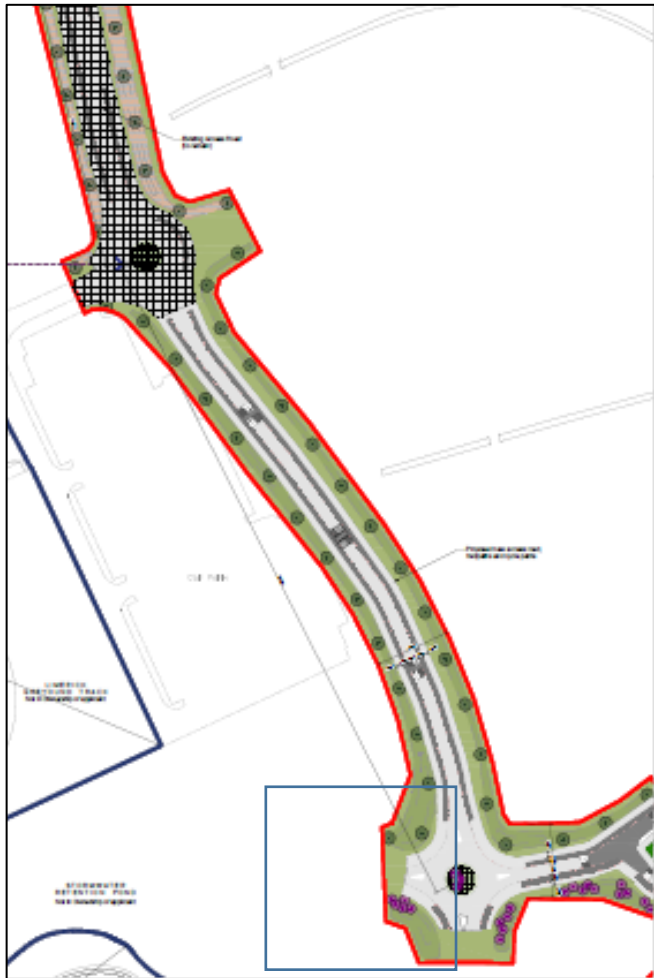


Figure 2.10: Extract from Reddy Architecture + Urbanism's Dwg. No. ZZ-ZZ-DR-A-02.1003 Rev A *'Proposed Site Plan sht 1'* showing provision of future connection to lands to the South.



### **Road levels with regard to the Flood Risk Assessment**

The enclosed *Flood Risk Assessment* (FRA), prepared by RPS provides details on the mitigation measures proposed in respect of flood risk at the site, including details of proposed site levels.

Section 5.5.3 '*Proposed Mitigation Measures*' states:

*"The SHD site will be filled to a level to ensure that all roads within the development will be developed to a minimum of 5.0m OD, and then all FFLs will be constructed to a minimum of 5.3m OD. The 5.3m level provides an allowance of 500mm freeboard and 500mm for climate change as described in Section 5.5.2 of this FRA. This provides over 1m freeboard to all new properties which is a very high standard of protection to what is considered 'highly vulnerable development' under the Guidelines. Note that the materials being used for filling operations is available within the application site by means of a cut and fill operation."* (page 26)

This section also provides justification as to why it is not proposed to raise the access road between Dock Road and the SHD. Refer to the FRA for full details.



### 3.0 ABP REQUEST TO PROVIDE ADDITIONAL INFORMATION

The Board's Opinion states:

*"Furthermore, Pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that, in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission:"*

The Board has requested specific information to be provided in relation to 21 No. items.

We set out below how each of the requirements has been addressed.

#### 3.1 ABP Requirement No. 1 – Material Contravention Statement (if applicable)

The ABP *Opinion* notes the requirement for:

*"Where the applicant considers that the proposed strategic housing development would materially contravene the relevant Development Plan or Local Area Plan, other than in relation to the zoning of the land, a statement indicating the plan objective(s) concerned and why permission should, nonetheless, be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act 2000. Notices published pursuant to Section 8(1)(a) of the Act of 2016 and Article 292 (1) of the Regulations of 2017, shall refer to any such statement in the prescribed format."*

##### 3.1.1 Applicant's Response

The proposed development is considered to materially contravene the *Limerick City Development Plan 2010-2016* in respect of the Apartment Standards contained within Part III of that Plan.

This planning application submission is therefore accompanied by a *Material Contravention Statement*, prepared by Tom Phillips + Associates.

The enclosed *Material Contravention Statement* sets out why permission should be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act 2000, as amended, notwithstanding that the proposed development materially contravenes a relevant development plan or local area plan other than in relation to the zoning of the land.

Reference to the material contravention is also set out on the published statutory notices.

#### 3.2 ABP Requirement No. 2 – Site Plan showing Land Zoning

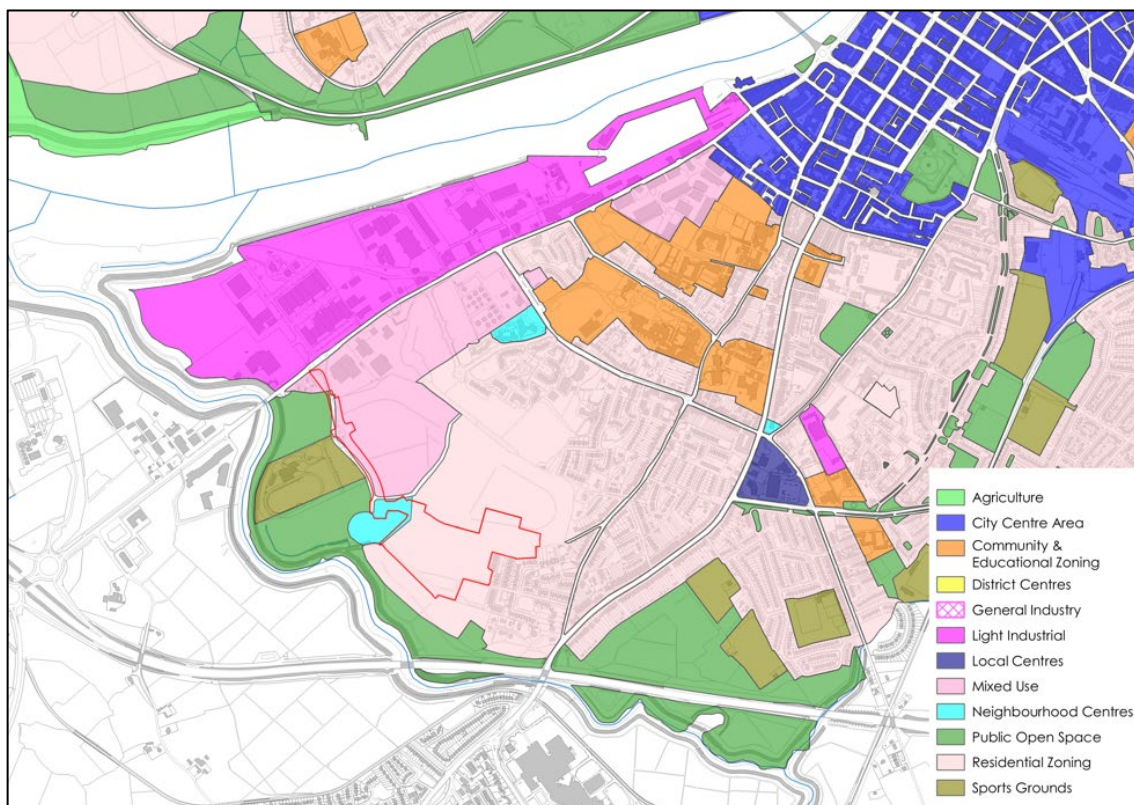
The ABP *Opinion* notes the requirement for:



*“A site plan showing the layout of the proposed development in relation to the various zonings that apply to the site.”*

### 3.2.2 Applicant’s Response

The enclosed *Statement of Consistency* prepared by Tom Phillips + Associates includes an indicative map which shows the SHD red line boundary in the context of the land use zonings that apply to the site. For ease of reference, this is also provided below:



**Figure 3.1: Land Use Zone Map (contained within Limerick City Development Plan 2010-2016) in the context of the subject site (denoted by the red line) (Source: Reddy Architecture + Urbanism (2021).**

In terms of land zoning, the majority of the application site is subject to **Zoning Objective 2A – 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 – 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 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 100m<sup>2</sup> per unit. **Residential uses are also acceptable within this zone.**”*

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.

### 3.3 ABP Requirement No. 3 – Masterplan

The ABP *Opinion* notes the requirement for:

*“A Masterplan for the overall Racecourse lands in the ownership of the prospective applicant, which is to consider the strategic importance of the lands for the development of Limerick Metropolitan Area and is to address matters including land use zoning, residential density, housing mix, provision of a neighbourhood centre, childcare provision, details of the capacity of roads / pedestrian / cycle / public transport infrastructure and connectivity to adjoining areas, IW foul and watermain infrastructure, surface water drainage and flood risk, landscaping and biodiversity enhancement measures.”*

#### 3.3.1 Applicant’s Response

Enclosed with this planning application is the *Greenpark Masterplan 2020* document, dated December 2020, which provides a Masterplan for the overall former Greenpark Racecourse lands which has been developed in consultation with Limerick City and County Council. The overall masterplan provides a mixed-use development vision for the lands and comprises an office campus, large scale residential development, a neighbourhood centre, a nursing home development, childcare facilities and all associated and facilitating infrastructure.

As well as an architectural masterplan, the *Greenpark Masterplan 2020* document provides a comprehensive planning assessment of the masterplan scheme, including the following environment aspects and planning considerations:

- Planning Policy Context
- Flood Risk

- Hydrology
- Soils, Geology, Hydrogeology
- Surface Water Drainage
- Traffic and Transportation
- Biodiversity
- Landscape
- Design

The above referenced assessments demonstrate that the overall lands can be developed in line with the proper planning and sustainable development of the area, including from a flood risk perspective.

In responding to the Board's Opinion, particularly Issue No. 1 in respect of residential density and housing mix, the SHD scheme was amended to include, *inter alia*, two further apartment blocks. The site wide Masterplan has been updated to reflect this important amendment to Phase 1 (this SHD scheme). The updated Masterplan is contained within the *Design Report* (page 5 onwards) prepared by Reddy Architecture + Urbanism.

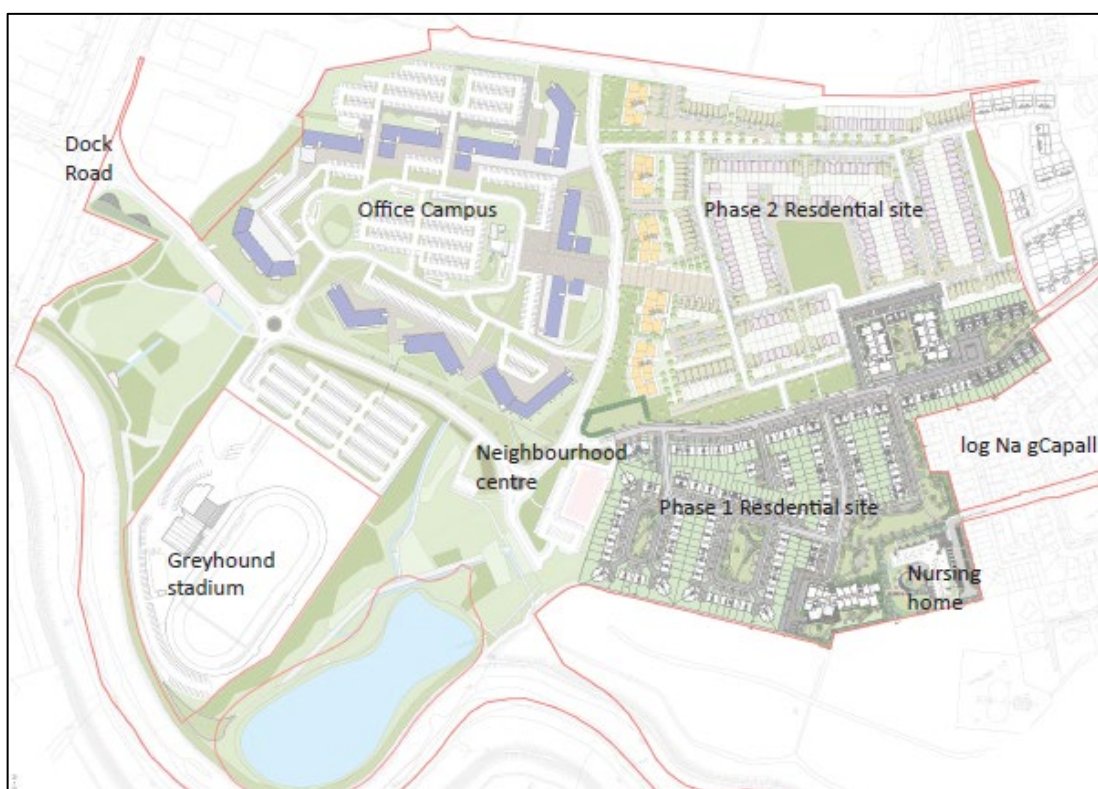


Figure 3.2: Extract from Reddy Architecture + Urbanism's *Design Report* showing the updated site wide Masterplan

Further to this, the enclosed *Traffic and Transportation Assessment* (TTA) prepared by PUNCH Consulting Engineers has regard to the impact of the proposed SHD scheme in combination with the future phases of the site wide masterplan.

### 3.4 ABP Requirement No. 4 – Phasing Plan

The ABP Opinion notes the requirement for:

“A detailed phasing plan for the proposed development, in the context of the Masterplan for the overall Racecourse lands.”

### 3.4.1 Applicant’s Response

The enclosed *Design Report*, prepared by Tom Phillips + Associates, includes an indicative Masterplan phasing plan and supporting narrative.

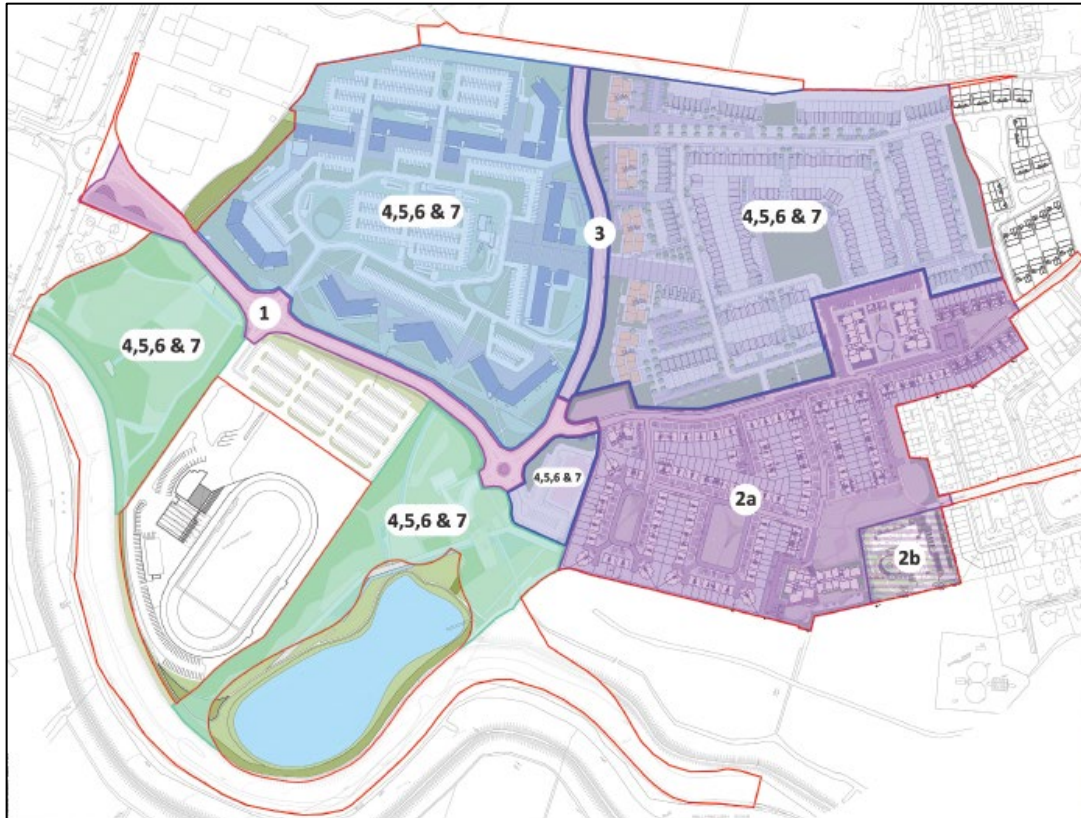
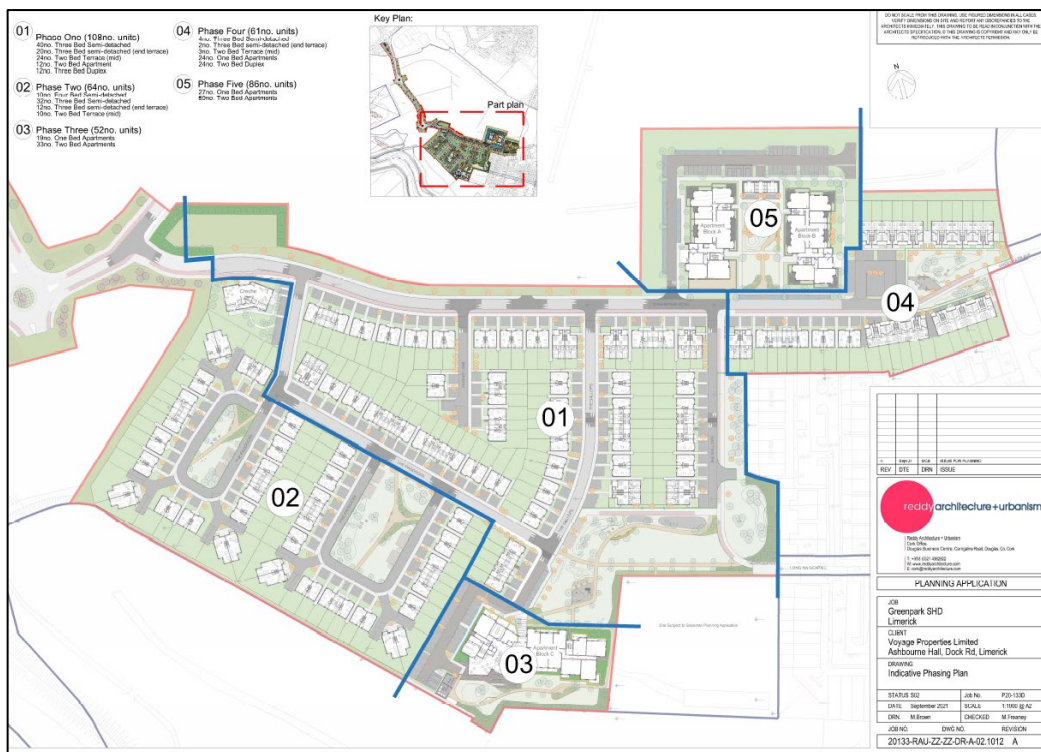


Figure 3.3: Extract from Reddy Architecture + Urbanism’s *Design Report* showing the indicative Masterplan Phasing.

This planning application is also supported by an *Indicative Phasing Plan* for the proposed SHD scheme. Refer to Dwg. No. 20133-RAU-ZZ-ZZ-DR-A-02.1012 Rev A for details. An extract is provided below.





**Figure 3.4: Extract from Reddy Architecture + Urbanism’s Dwg. No. 20133-RAU-ZZ-ZZ-DR-A-02.1012 Rev A showing the indicative phasing in respect of the proposed SHD scheme.**

### 3.5 ABP Requirement No. 5 – Housing Quality Assessment

The ABP Opinion notes the requirement for:

*“Housing Quality Assessment with regard to the standards set out in the Sustainable Urban Housing Design Standards for New Apartments Guidelines for Planning Authorities.”*

#### 3.5.1 Applicant’s Response

A *Housing Quality Assessment* (HQA), prepared by Reddy Architecture + Urbanism is enclosed with this planning application.

### 3.6 ABP Requirement No. 6 – A Building Lifecycle Report

The ABP Opinion notes the requirement for:

*“A building life cycle report shall be submitted in accordance with section 6.3 of the Sustainable Urban housing: Design Standards for New Apartments (2020). The report should have regard to the long-term management and maintenance of the proposed development.”*

#### 3.6.1 Applicant’s Response

A *Building Lifecycle Report*, prepared by Reddy Architecture + Urbanism is enclosed with this planning application.



### 3.7. ABP Requirement No. 7 – Taken in Charge Drawing

The ABP Opinion notes the requirement for a:

*“A site layout plan showing which, if any, areas are to be taken in charge by the planning authority.”*

#### 3.7.1 Applicant’s Response

This planning application is accompanied by indicative taken in charge drawings, prepared by Tom Phillips + Associates. Refer to the following drawings:

- Dwg. No. 20133-RAU-ZZ-ZZ-DR-A-02.1010 ‘Indicative Taking In Charge Plan – Sht 1’
- Dwg. No. 20133-RAU-ZZ-ZZ-DR-A-02.1011 ‘Indicative Taking In Charge Plan – Sht 2’

### 3.8 ABP Requirement No. 8 – Daylight, Sunlight and Overshadowing Analysis

The ABP Opinion notes the requirement for:

*“A Sunlight/Daylight/Overshadowing analysis showing an acceptable level of residential amenity for future occupiers and existing residents, which includes details on the standards achieved within the proposed residential units, in private and shared open space, and in public areas within the development and in adjacent properties. This report should address the full extent of requirements of BRE209/BS2011, as applicable.”*

#### 3.8.1 Applicant’s Response

This planning application is accompanied by a full suite of daylight, sunlight and overshadowing analysis, prepared by ARC Architectural Consultants Limited, in respect of the proposal and its potential impact upon the surrounding area.

The following documents consider the compliance of the proposed development (residential units and open spaces) with the relevant guidelines:

- *Assessment of Sunlight and Daylight Access within the Proposed Development*
- *Shadow Diagrams of the Proposed Development*
- *Chapter 15 Microclimate – Daylight/ Sunlight of the EIAR (impact of proposed development upon receiving environment)*

### 3.9 ABP Requirement No. 9 – Site Levels

The ABP Opinion notes the requirement for:

*Existing and proposed ground levels across the site. Detailed cross sections indicating proposed FFL’s, boundary treatments, road levels, open space levels, SUDS measures, etc. relative to each other and relative to adjacent lands and*



*structures. Also topographical details and cross sections to indicate the relationship between the development and any adjacent watercourses and wetlands with regard to the protection of riparian zones.*

### 3.9.1 Applicant's Response

The following drawings enclosed with this planning application provide the details requested by the Board.

Existing and proposed ground levels across the site:

- Reddy Architecture + Urbanism Dwg. No. 20133-RAU-ZZ-ZZ-DR-A-02.1001 *'Existing Site and Topographical Plan'*
- Reddy Architecture + Urbanism Dwg. No. 20133-RAU-ZZ-ZZ-DR-A-02.1003 *'Proposed Site Plan – sht 1'*
- Reddy Architecture + Urbanism Dwg. No. 20133-RAU-ZZ-ZZ-DR-A-02.1004 *'Proposed Site Plan – sht 2'*

Road sections showing existing and proposed levels:

- PUNCH Dwg. No. 191325-PUNCH-XX-XX-DR-C-0475 *'Proposed Road Sections 1 of 3'*
- PUNCH Dwg. No. 191325-PUNCH-XX-XX-DR-C-0476 *'Proposed Road Sections 2 of 3'*
- PUNCH Dwg. No. 191325-PUNCH-XX-XX-DR-C-0477 *'Proposed Road Sections 3 of 3'*

Foul sewer and surface water sections:

- PUNCH Dwg. No. 191325-PUNCH-XX-XX-DR-C-0177 *'Surface Water Sections (Sheet 1 of 3)'*
- PUNCH Dwg. No. 191325-PUNCH-XX-XX-DR-C-0178 *'Surface Water Sections (Sheet 2 of 3)'*
- PUNCH Dwg. No. 191325-PUNCH-XX-XX-DR-C-0179 *'Surface Water Sections (Sheet 3 of 3)'*
- PUNCH Dwg. No. 191325-PUNCH-XX-XX-DR-C-0175 *'Foul Sewer Sections (Sheet 1 of 2)'*
- PUNCH Dwg. No. 191325-PUNCH-XX-XX-DR-C-0176 *'Foul Sewer Sections (Sheet 2 of 2)'*

Landscape levels, including open space and boundary treatment:

- Murray & Associates Dwg. No. 1835\_PL\_S\_01 Rev E *'Landscape Sections'*

### 3.10 ABP Requirement No. 10 – Traffic and Transport Impact Assessment

The ABP Opinion notes the requirement for:

*"Traffic and Transport Impact Assessment, to be prepared in consultation with Limerick City and County Council and to include consideration of (i) mobility management and public transport currently available in the area; (ii) potential impacts on relevant local road junctions; (iii) cumulative impacts with traffic associated with nearby schools and residential areas."*



### 3.10.1 Applicant's Response

This planning application is supported by a *Traffic and Transportation Assessment* and a *Mobility Management Plan*, prepared by PUNCH Consulting Engineers. The project engineers have consulted with Limerick City and County Council where appropriate. The above referenced documents address the points raised in the Opinion above.

### 3.11 ABP's Requirement No. 11 – Car Parking Rationale

The ABP Opinion notes the requirement for:

*“Rationale for proposed parking provision with regard to development plan parking standards and to the ‘Sustainable Urban Housing Design Standards for New Apartments – Guidelines for Planning Authorities’ (2020). The proposed car and cycle parking provision should include areas designated for parking or drop off purposes associated with the childcare facility.”*

#### 3.11.1 Applicant's Response

The enclosed *Traffic and Transport Assessment* (TTA) prepared by PUNCH Consulting Engineers has regard to the proposed car parking and cycle parking provision (for both the residential development and childcare facility) in the context of the requirements of *Limerick City Development Plan 2010-2016*.

Furthermore, the enclosed *Statement of Consistency*, prepared by Tom Phillips + Associates also has regard to the proposed parking provision in the context of the Development Plan requirement and the provisions of the *Sustainable Urban Housing Design Standards for New Apartments – Guidelines for Planning Authorities’ (2020)*.

### 3.12 ABP Requirement No. 12 – Road Safety Audit

The ABP Opinion notes the requirement for:

*“Stage I Road Safety Audit.”*

#### 3.12.1 Applicant's Response

This planning application is supported by a *Stage 1 Road Safety Audit*, prepared by Bruton Consulting Engineers.

### 3.13 ABP Requirement No. 13 – Noise Assessment

The ABP Opinion notes the requirement for:

*“A noise assessment, which addresses the potential noise impact from the N18 and N69 on the proposed development and clearly outlines proposed noise mitigation measures, if so required. The noise assessment should be carried out by a suitably qualified acoustic engineer.”*





### 3.13.1 Applicant's Response

This planning application is accompanied by an *Environmental Impact Assessment Report* (EIAR) which includes Chapter 12 (Noise and Vibration) that assesses the potential environmental impacts arising from the proposed development in respect of noise and vibration.

The assessment undertaken has regard to the potential noise impact arising from the N18 and N69 and recommends associated mitigation measures.

### 3.14 ABP Requirement No. 14 – LVIA and CGIs

The ABP Opinion notes the requirement for:

*“Landscape and Visual Impact Assessment with photomontages and CGIs of the proposed development, to include, inter alia, consideration of visual impacts on adjacent residential areas and on any sensitive or designated views / prospects in the vicinity, with regard to relevant development plan landscape designations.”*

#### 3.14.1 Applicant's Response

This planning application is accompanied by a full Landscape and Visual Impact Assessment, undertaken by Murray & Associates and incorporated into the EIAR (Chapter 13) which is based upon the enclosed photomontages produced by Digital Dimensions. The landscape and visual assessment has regard to 12 no. viewpoints.

Digital Dimensions has also produced a number of CGIs which are incorporated into the *Design Report*.

### 3.15 ABP Requirement No. 15 – Site Specific Flood Risk Assessment

The ABP Opinion notes the requirement for:

*“Site Specific Flood Risk Assessment to include (i) details of proposals for the drainage of the site and the attenuation of surface water runoff and (ii) Justification Test with regard to the presence of Flood Zone A at the site. The issue of existing flood defences in the area is to be considered with regard to the relevant guidance provided in the Planning System and Flood Risk Management Guidelines for Planning Authorities (including the associated Technical Appendices).”*

#### 3.15.1 Applicant's Response

This planning application is accompanied by a *Flood Risk Assessment* (FRA), prepared by RPS. The FRA includes the information required by the Board in points (i) and (ii) set out above.



### 3.16 ABP Requirement No. 16 – Landscaping Scheme

The ABP Opinion notes the requirement for:

*“Comprehensive landscaping scheme for the entire site to include (i) tree Survey, Arboricultural Report and Impact Assessment, to provide a detailed survey of any trees and hedgerows at the development site and assessment of the quality and quantity of the specimens to be removed, along with measures to protect trees and hedgerows to be retained during construction; (ii) rationale for proposed public open space provision for the housing development, to include an open space hierarchy, details of play areas and detailed layouts for the public open spaces; (iii) additional landscaping details including details of hard and soft landscaping, play equipment (if provided), boundary treatments, delineation of public and communal open space provision, pedestrian and cycle facilities, public lighting, car and cycle parking areas and refuse storage areas.”*

#### 3.16.1 Applicant’s Response

This planning application is supported by a robust landscape strategy and supported by the following documentation, prepared by Murray & Associates:

- *Landscape Design Report*
- *Outline Landscape Works Specification (incorporating Landscape Management Plan)*
- *Dwg. No. 1835\_PL\_P\_02 Rev E Landscape Masterplan*
- *Dwg. No. 1835\_PL\_0\_01 Rev D Landscape Masterplan: Main Road*
- *Dwg. No. 1835\_PL\_P\_04 Rev E Soft Landscape Plan*
- *Dwg. No. 1835\_PL\_01 Rev E Landscape Sections*
- *Dwg. No. 1835\_PL\_P\_03 Rev D Landscape Boundary Plan & Details*

Further to the above, the planning application includes an *Arboricultural Impact Assessment Report*, prepared by Arbor Care and Dwg. No. GPL-TS-002 *Tree Protection Plan*.

### 3.17 ABP Requirement No. 17 – Childcare Proposal

The ABP *Opinion* notes the requirement for:

*“Childcare proposals to detail the number of children that the proposed creche will cater for.”*

#### 3.17.1 Applicant’s Response

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.



Further to the above, the childcare facility is appropriately located in close proximity to the main site entrance which connects to Dock Road.

*Specific Design Requirements.	
<b>AGE OF CHILD/ FLOOR AREA PER CHILD</b>	
<b>0 – 1</b>	<b>3.70 m2 per child</b>
<b>1 – 2</b>	<b>2.80 m2 per child</b>
<b>2 – 6</b>	<b>2.32 m2 per child</b>
<u>Proposed Facility</u>	
Room 1 / 0-1 year 82sqm (max 22 children)	
Room 2 / 1-2 years 77sqm (max 27 children)	
Room 3 / 2-3 years 45sqm (max 15 children)	
Room 4 / 2-3 years 45sqm (max 15 children)	
Shared dining room 40sqm	

### 3.18 ABP Requirement No. 18 – Construction and Waste Management Plans

The ABP *Opinion* notes the requirement for:

*“A draft Construction Waste Management Plan, draft Construction and Environmental Management Plan and a draft Operational Waste Management Plan.”*

#### 3.18.1 Applicant’s Response

This planning application is accompanied by the following documents, prepared by Gavin & Doherty Geosolutions:

- *Planning Stage Construction Environmental Management Plan (CEMP)*
- *Construction Waste Management Plan*
- *Operational Waste Management Plan*

### 3.19 ABP Requirement No. 19 – Irish Water

The ABP *Opinion* notes the requirement for:

*“Irish Water has advised that applicant that its records indicate there is significant existing water and wastewater infrastructure traversing the site. Due to the size and significance of these IW assets a diversion(s) will not be feasible. Additionally, the proposed wastewater network and associated connection to the public network will be carried out at a significant depth and in excess of 6m. The prospective applicant is advised to engage with the IW Diversions section prior to lodging any application for the development site.”*



### 3.19.1 Applicant's Response

PUNCH Consulting Engineers have liaised with Irish Water on behalf of the Applicant. A confirmation of feasibility letter was received from Irish Water Diversions section in September 2021. Refer to Appendix C of *Engineering Planning Report*.

### 3.20 ABP Requirement No. 20 – Appropriate Assessment

The ABP *Opinion* notes the requirement for:

*“AA screening report or Natura Impact Statement.”*

#### 3.20.1 Applicant's Response

This planning application submission is accompanied by a *Natura Impact Statement (NIS)*, prepared by Ecology Ireland.

### 3.21 ABP Requirement No. 21 – Article 299B

The ABP *Opinion* notes the requirement for:

*“The information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018, unless it is proposed to submit an EIAR at application stage.”*

#### 3.21.1 Applicant's Response

This planning application is accompanied by an *Environmental Impact Assessment Report (EIAR)*.

#### 4.0 CONCLUSION

We consider that all issues that have been raised during the Pre-Application Consultation process have been successfully addressed in the final Application now before the Board for consideration.

The subject lands can play a key role in addressing the housing crisis providing housing within an established suburban location, well connected to Limerick City and a number of key employment centres.

The proposed Strategic Housing Development of, *inter alia*, 371 No. units, will provide a strategically important contribution to housing delivery in the administrative area of Limerick City and County Council.

This document specifically addresses the specific information requested by An Bord Pleanála in relation to the development proposed.

The relevant prescribed bodies/authorities identified by the Board in the Pre-Application correspondence have been notified of the submission of the Planning Application in accordance with Section 8(1)(b) of the *Planning and Development (Housing) and Residential Tenancies Act, 2016* (as amended).

Yours faithfully

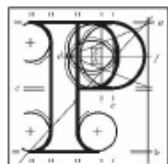


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**John Gannon**  
**Director**  
**Tom Phillips + Associates**

**Encl.**

APPENDIX A: COPY OF ABP *OPINION* FOR ABP REF. 310233-21



An  
Bord  
Pleanála

**Case Reference:**

**ABP-310233-21**

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Planning and Development (Housing) and Residential Tenancies Act 2016

Notice of Pre-Application Consultation Opinion

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**Proposed Development: 287 no. residential units (139 no. houses, 148 no. apartments), creche and associated site works.**

**Lands at the former Greenpark, Dock Road, Limerick City.**

An Bord Pleanála has considered the issues raised in the pre-application consultation process and, having regard to the consultation meeting and the submission of the planning authority, is of the opinion that the documents submitted with the request to enter into consultations require further consideration and amendment to constitute a reasonable basis for an application for strategic housing development.

An Bord Pleanála considers that the following issues need to be addressed in the documents submitted that could result in them constituting a reasonable basis for an application for strategic housing development.

**1. Residential Density and Housing Mix**

Further consideration / justification of the documents as they relate to the issues of residential density and housing mix, with regard to the following matters:

- The status of the Racecourse lands as one of the largest remaining undeveloped land banks in Limerick City.



- The strategic importance of the proposed development site and the Racecourse lands for the development of the Limerick Metropolitan area, in the context of national planning policy to achieve compact urban areas and, specifically, National Planning Objectives NPO 2a, NPO 3b, NPO 7, NPO8 regarding the development of Ireland's existing cities; NPO 5 regarding the development of cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity and NPO 35 to increase residential density in settlements, as set out in the National Planning Framework.
- National planning policy on residential development as set out in the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities and the Design Standards for New Apartments Guidelines for Planning Authorities.
- Table 2.4 of the Core Strategy of the Limerick City Development Plan 2010-2016 (as varied), which identifies the Racecourse lands (36 ha) as having capacity for 1,188 no. residential units, also the objectives for the Racecourse lands set out in Development Plan Chapter 14.
- The accessible location of the proposed development site close to Limerick City Centre, Mary Immaculate College, Dooradoyle District Centre and employment zones such as the Raheen Industrial Estate and University Hospital Limerick campus.
- The availability of existing and proposed roads, pedestrian, cycle and public transport infrastructure in the vicinity of the site, in the context of the draft Limerick Shannon Metropolitan Area Transport Strategy (LSMATS).

The further consideration of this issue may require an amendment to the documents and/or design rationale submitted.

## 2. Design and Layout of Development

Further consideration/justification of the documents as they relate to the design and layout of residential development. The prospective applicant should satisfy themselves that the proposed design and layout provide the optimal urban design and architectural solution for this site and are of sufficient quality to ensure that the





proposed development makes a positive contribution to the character of the area over the long term. In this regard, the submitted documents should allow for particular consideration of the following matters:

- The development shall comprise separate Character Areas, with an integrated hierarchy of public open spaces at accessible, well overlooked locations throughout the site. The public open spaces shall address specific functions such as active / passive open spaces and play areas. The Character Areas shall include a consistent approach to (i) the design and finish of houses / apartment buildings; (ii) roads and footpaths layout materials and finishes; (iii) hard and soft landscaping and tree retention (where proposed); (iv) biodiversity enhancement measures; (v) relevant SuDS measures.
- Details of the proposed development shall be provided in the context of any other current proposals for adjacent developments within the Racecourse lands, such as the nursing home to the south east of the development site, also the development permitted to the north east of the proposed development site under Reg. Ref. 17/1190 ABP-302015-18.
- The associated provision of a public lighting scheme, to the satisfaction of the planning authority.

The further consideration of these issues may require an amendment to the documents and/or design proposals submitted relating to design and layout of the proposed development.

### 3. Roads, Pedestrian and Cycle Connectivity

Further consideration of the documents as they relate to road / pedestrian / cycle connectivity to South Circular Road via adjacent residential areas to the north and east of the site, to include the capacity of existing roads, pedestrian and cycle infrastructure at these locations, as well as the potential cumulative impacts of the development of adjacent sites within the overall Racecourse lands in the context of the proposed Masterplan and any current proposals to develop adjacent sites within the Masterplan area, also the development permitted Reg. Ref. 17/1190 ABP-ABP-310233-21



302015-18. The prospective applicant is also advised to consider connectivity to adjoining development sites within the Masterplan lands and to potential future connectivity to the lands owned by Limerick City and County Council to the south of the development site. The following matters should also be taken into consideration:

- The draft Limerick Shannon Metropolitan Area Transport Strategy, including proposals for roads, pedestrian, cycle and public transport infrastructure in the area.
- The prospective applicant is advised to liaise with the planning authority regarding connectivity to Council lands to the south of the development site. They should at a minimum not preclude any future connections to adjoining lands.
- Existing and proposed roads levels with regard to the SSFRA.

The further consideration of these issues may require an amendment to the documents and/or design proposals submitted relating to design and layout of the proposed development.

Furthermore, Pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that, in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission:

1. Where the applicant considers that the proposed strategic housing development would materially contravene the relevant Development Plan or Local Area Plan, other than in relation to the zoning of the land, a statement indicating the plan objective(s) concerned and why permission should, nonetheless, be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act 2000. Notices published pursuant to Section 8(1)(a) of the Act of 2016 and Article 292 (1) of the Regulations of 2017, shall refer to any such statement in the prescribed format



2. A site plan showing the layout of the proposed development in relation to the various zonings that apply to the site.2
3. A Masterplan for the overall Racecourse lands in the ownership of the prospective applicant, which is to consider the strategic importance of the lands for the development of Limerick Metropolitan Area and is to address matters including land use zoning, residential density, housing mix, provision of a neighbourhood centre, childcare provision, details of the capacity of roads / pedestrian / cycle / public transport infrastructure and connectivity to adjoining areas, IW foul and watermain infrastructure, surface water drainage and flood risk, landscaping and biodiversity enhancement measures.
4. A detailed phasing plan for the proposed development, in the context of the Masterplan for the overall Racecourse lands.
5. Housing Quality Assessment with regard to the standards set out in the Sustainable Urban Housing Design Standards for New Apartments Guidelines for Planning Authorities.
6. A building life cycle report shall be submitted in accordance with section 6.3 of the Sustainable Urban housing: Design Standards for New Apartments (2020). The report should have regard to the long-term management and maintenance of the proposed development.
7. A site layout plan showing which, if any, areas are to be taken in charge by the planning authority.
8. A Sunlight/Daylight/Overshadowing analysis showing an acceptable level of residential amenity for future occupiers and existing residents, which includes details on the standards achieved within the proposed residential units, in



private and shared open space, and in public areas within the development and in adjacent properties. This report should address the full extent of requirements of BRE209/BS2011, as applicable.

9. Existing and proposed ground levels across the site. Detailed cross sections indicating proposed FFL's, boundary treatments, road levels, open space levels, SUDS measures, etc. relative to each other and relative to adjacent lands and structures. Also topographical details and cross sections to indicate the relationship between the development and any adjacent watercourses and wetlands with regard to the protection of riparian zones.
10. Traffic and Transport Impact Assessment, to be prepared in consultation with Limerick City and County Council and to include consideration of (i) mobility management and public transport currently available in the area; (ii) potential impacts on relevant local road junctions; (iii) cumulative impacts with traffic associated with nearby schools and residential areas.
11. Rationale for proposed parking provision with regard to development plan parking standards and to the 'Sustainable Urban Housing Design Standards for New Apartments – Guidelines for Planning Authorities' (2020). The proposed car and cycle parking provision should include areas designated for parking or drop off purposes associated with the childcare facility.
12. Stage I Road Safety Audit
13. A noise assessment, which addresses the potential noise impact from the N18 and N69 on the proposed development and clearly outlines proposed noise mitigation measures, if so required. The noise assessment should be carried out by a suitably qualified acoustic engineer.



14. Landscape and Visual Impact Assessment with photomontages and CGIs of the proposed development, to include, *inter alia*, consideration of visual impacts on adjacent residential areas and on any sensitive or designated views / prospects in the vicinity, with regard to relevant development plan landscape designations

15. Site Specific Flood Risk Assessment to include (i) details of proposals for the drainage of the site and the attenuation of surface water runoff and (ii) Justification Test with regard to the presence of Flood Zone A at the site. The issue of existing flood defences in the area is to be considered with regard to the relevant guidance provided in the Planning System and Flood Risk Management Guidelines for Planning Authorities (including the associated Technical Appendices).

16. Comprehensive landscaping scheme for the entire site to include (i) tree Survey, Arboricultural Report and Impact Assessment, to provide a detailed survey of any trees and hedgerows at the development site and assessment of the quality and quantity of the specimens to be removed, along with measures to protect trees and hedgerows to be retained during construction; (ii) rationale for proposed public open space provision for the housing development, to include an open space hierarchy, details of play areas and detailed layouts for the public open spaces; (iii) additional landscaping details including details of hard and soft landscaping, play equipment (if provided), boundary treatments, delineation of public and communal open space provision, pedestrian and cycle facilities, public lighting, car and cycle parking areas and refuse storage areas.

17. Childcare proposals to detail the number of children that the proposed creche will cater for.



18. A draft Construction Waste Management Plan, draft Construction and Environmental Management Plan and a draft Operational Waste Management Plan.

19. Irish Water has advised that applicant that its records indicate there is significant existing water and wastewater infrastructure traversing the site. Due to the size and significance of these IW assets a diversion(s) will not be feasible. Additionally, the proposed wastewater network and associated connection to the public network will be carried out at a significant depth and in excess of 6m. The prospective applicant is advised to engage with the IW Diversions section prior to lodging any application for the development site.

20. AA screening report or Natura Impact Statement.

21. The information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018, unless it is proposed to submit an EIAR at application stage.

Also, pursuant to article 285(5)(a) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is informed that the following authorities should be notified in the event of the making of an application arising from this notification in accordance with section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended:

1. Irish Water
2. Transport Infrastructure Ireland
3. National Transport Authority
4. Limerick County Childcare Committees
5. Health and Safety Authority





**PLEASE NOTE:**

Under section 6(9) of the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended, neither the holding of a consultation under section 6, nor the forming of an opinion under that section, shall prejudice the performance by the Board, or the planning authority or authorities in whose area the proposed strategic housing development would be situated, of any other of their respective functions under the Planning and Development Acts 2000 to 2020 or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.

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Tom Rabbette  
Assistant Director of Planning  
July, 2021