

Planning Report & Statement of Consistency

Residential Development at Ballykeeffe, Raheen, LIMERICK

DRAFT FEBRUARY 2022

ON BEHALF OF:

DW Raheen Developments
Ltd.

EXECUTIVE SUMMARY	
This Statement of Consistency sets out how the proposed development scheme complies with sta	ted
policies for the area incl. Ministerial planning guidelines.	

1.0 INTRODUCTION

This document has been prepared as part of an application for a Strategic Housing Development to An Bord Pleanála for a residential development project in Limerick. The proposed project forms a 'Strategic Housing Development' as it contains more than 100 dwelling units. Section 4(1) of the Act of 2016¹ provides that an application for permission for a strategic housing development shall be made directly to An Bord Pleanála and not to a Planning Authority. In addition to this Statement of Consistency please refer to the application form that has been included with the application documents.

The site of the proposed development is a site that has been zoned for residential development and where a previous planning permission for such development was granted. A roundabout to facilitate access to that development on the regional road R510 was constructed and an arm on the roundabout providing vehicular access to the site is in place. The proposed development is a residential development that provides a mixture of houses, duplex units and apartments. In addition a childcare facility is provided also. Section 2 of this report sets out details of the site location and context. Section 3 sets out the planning and site history for the site and the sites immediately adjoining. Section 4 provides a detailed description of the proposed development.

In compliance with requirements, pre-application consultations have been held with the planning authority. Section 9 sets out details re these meetings and refers to the design progression that was developed. A pre-application consultation with An Bord has been completed. An Opinion by An Bord Pleanála issued in October 2020 and refers to case ref. no. ABP 307185-20.²

The consistency report should be read in conjunction with all planning documentation submitted with the application.

2.0 SITE DESCRIPTION AND CONTEXT

The ca. 10.44 hectare site is greenfield land that is enclosed by existing residential development to the south, east and west and open land to the north. The northern boundary is formed by a former and disused railway line. The land to the north of that is enclosed by the National Road N18. The western boundary is formed by the regional road R510. Most of the southeastern boundary is formed by boundary walls of established residential development. The lands are relatively flat and there are no restrictions on the future development of the lands for residential development. An existing roundabout

¹ Planning and Development (Housing) and Residential Tenancies Act 2016.

² Planning and Development (Housing) and Residential Tenancies Act 2016 Notice of Pre-Application Consultation Opinion – Case Reference ABP-307185-20, An Bord Pleanála, October 2020.

provides vehicular access to the site. The dedicated arm of the roundabout for this access is currently blocked off.

3.0 PLANNING AND SITE HISTORY

Permission was granted in 2007 for a development of 257 dwellings and apartments on a site that overlaps with the current application site. The permission was not taken up and has expired.³

In 2009 permission was granted for a 111 unit residential development of houses and apartments.⁴ This permission was not taken up. An application for extension of duration of the planning permission was refused by the planning authority in March 2015 for the following reason: ..." The Planning Authority consider that there have been significant changes in the development objectives in the development plan since the date of the grant of planning permission 09/756, including policy WS.8 Flood Protection and WS.9 Flood Risk of the Limerick City Development Plan 2010-2016 and having regard to the Flood Risk management Guidelines for Planning Authorities 2009, that the development would no longer be consistent with the proper planning and sustainable development of the area."⁵

In 2009 a part 8 procedure was commenced for a detailed development proposal for a neighbourhood park in the northern portion of the site.⁶ This neighbourhood park had been proposed in the Southern Environs Local Area Plan. However, the application was not pursued and appears to have been abandoned.

4.0 PROPOSED DEVELOPMENT

The proposed development is for a residential scheme comprising of a total of 384 dwelling units at a density of 40.3 dwellings per hectare or 41.1 dwellings per hectare if the area of the creche is excluded from the site. The effective site area for density calculation purposes is based on: an overall site area of 10.44 hectares minus 0.91 ha in the flood risk zone minus 0.19 ha for the creche results in an effective site area of 9.34 ha. The scheme is comprised of 202 houses, 58 own door apartments incl. duplex units and 124 apartments. A creche facility forms part of the overall development. See table 1.

⁵ Pl. ref. 157003.

³ Planning ref. 012368

⁴ Pl. ref. 09756

⁶ Part 8 Development: ref. 096004 and an earlier application pl. ref. 086009.

Unit Type	One Bed	Two Bed	Three Bed	Four Bed	Total
Apartment own door	-	20	28	10	58
Apartment	46	78	-	-	124
Houses	-	20	156	26	202
Total	46	118	184	36	384

Table 1 - Accommodation schedule

Vehicular access is proposed from a single access point at the existing roundabout on the regional road R510. A cycling lane will be provided along the regional road for the full length of the western site boundary. A short footpath connection is proposed in the eastern site boundary to facilitate pedestrian and cyclist permeability with the adjoining residential development. This footpath will connect to a public road. See **Site Layout Plan**.

Public open space is provided in the form of large area of public open space near the northwestern corner of the site which will integrate with the parkland that is located to the north of the site between the proposed development and the railway line. Additional public open space is provided in small pockets at the entrance to the development and in the residential courtyards. An extensive scheme of tree planting is proposed throughout the development. Please refer to the **Architecture Report and Urban Design Statement** by Gleeson McSweeney, Architects for further details.

The design of the proposed development has been progressed and developed through detailed consultation with the planning authority but was further modified in response to the Opinion from An Bord Pleanala.

The design approach / intent is to ensure that the disposal of storm water from the developed site will equate to the disposal of storm water from the existing undeveloped brownfield site. In addition, all rainwater from the roofs of the buildings will be stored. Please refer to the **Civil Engineering Report** included with the application documentation.

A Pre-Connection Enquiry Form was submitted to Irish Water and has been acknowledged.⁷ Please refer to the **Confirmation of Feasibility Letter** from Irish Water that is included in the application documentation.

A site specific flood risk assessment has been carried out. As a result of this study, an area in the north western corner has been defined as being within a flood risk zone. This area has been included in public open space and all dwelling units are outside this area. An updated Site Specific Flood Risk Assessment report has been prepared in response to the Bord Pleanala Opinion. Please refer to the **Flood Risk Analysis**⁸ report that has been included in the application documentation.

The proposed development comprises a combination of dwelling houses and apartments. A detailed phasing plan is proposed which ensures that in each phase of the development, a completed development is achieved while building work in subsequent phases does not interfere with the completed sections. The creche facility will be provided in phase 1 of the development. See for the detailed phasing the Architecture Report and Urban Design Statement and Drawing no. 1704-10-104.

The proposed development is on land zoned for residential development in the current local area plan for the area. However, the applicants are in control of additional lands to the north and east of the site which they consider suitable for similar residential development with an additional vehicular access point from the east. However, as these lands are currently not zoned for development, they do not form part of the current planning application. In consultation with the planning authority it has been decided that it is prudent to design the proposed development in such a way that suitable integration with additional residential development to the east of the application site can be achieved if those lands should be zoned for development in the future. A masterplan showing such possible integration has been included with the planning application documentation. Please refer to drawing no. 1704-10-103.

5.0 NATIONAL AND REGIONAL POLICY

The National Planning Framework (NPF) came into effect in May 2018. Limerick City is one of four cities that form together with Dublin the primary tier of the national settlement strategy. Under the NPF 50% of all new housing within Limerick City is to occur within the existing city and suburbs footprint, through brownfield, infill and regeneration. The NPF also sets a minimum population target for Limerick City and

⁸ Raheen Flood Risk Assessment, JBA Consulting, January 2022.

⁹ Project Ireland 2040 - National Planning Framework, Government of Ireland 2018, p. 22.

⁷ Irish Water ref. no. 0587989218,

¹⁰ Project Ireland 2040 - National Planning Framework, Government of Ireland 2018, National Policy Objective 3b.

Suburbs of 141,000 in 2040 which represents a growth of 50% of the 2016 population.¹¹ The proposed development contributes towards achieving these policies and targets. Through the proposed housing mix and attractive location adjacent to open parkland, the proposed development also meets the National Policy Objective 4 which states: "Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being."¹²

The Regional Economic and Spatial Strategy was adopted in final form on 31st January 2020. Limerick-Shannon is identified in the Regional Strategy as a City-Metropolitan Area for the region. As part of the strategy, a Metropolitan Area Strategic Plan (MASP) for the Limerick Shannon area has been prepared. The MASP supports a ..." sequential approach to development with a primary focus on the consolidation of sites within or contiguous to the existing built up and zoned area of Limerick City and Suburbs". ¹³ The proposed development is in accordance with the development principle.

6.0 PLANNING POLICY GUIDELINES

A large number of Ministerial Guidelines have been issued under Section 28 of the Planning and Development Act, 2000 (as amended). Under the provisions of the legislation, planning authorities and An Bord Pleanála must comply with these guidelines not only in setting out planning policy (relevant for planning authorities) but also in interpreting these policies in the light of the Guidelines as well as applying the Guidelines in making decisions on planning applications.¹⁴

The following planning guidelines have been considered relevant in assessing the proposed development consistency with national planning policy.

- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009),
 and the accompanying Urban Design Manual
- The Planning System and Flood Risk Management (2009)
- Design Manual for Urban Roads and Streets (2013)
- Design Standards for New Apartments Guidelines for Planning Authorities (December 2020)
- 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

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¹¹ Project Ireland 2040 - National Planning Framework, Government of Ireland 2018, National Policy Objective 8.

¹² Project Ireland 2040 - National Planning Framework, Government of Ireland 2018, National Policy Objective 8.

¹³ Regional Spatial & Economic Strategy for the Southern Region, Southern Regional Assembly, 2020, p. 289.

- Urban Development and Building Heights Guidelines for Planning Authorities December 2018
- Guidelines for Planning Authorities on Childcare Facilities (2001)
- Appropriate Assessment Guidelines for Planning Authorities (2009)
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment.

Guidelines on Sustainable Residential Development in Urban Areas

These guidelines set out the key planning principles for residential development, outlining broad principles for sustainable neighbourhoods, density, conservation and settlement strategies. In addition to the Guidelines document the Urban Design manual provides a checklist of good practice in the design of infill developments. This checklist is considered in relation to the proposed development in Appendix A. The main conclusions from this assessment are as follows:

- The scheme achieves sequential development that enables the connection of existing suburban housing to the south with the city.
- Significant planning gain is achieved by facilitating public access to the public open space lands adjoining the former railway line and the possible future integration of a 'greenway' if this is achieved along the disused railway line. This access is currently not available.
- The density is appropriate given the location of the lands and established densities in the vicinity.
- The site layout provides for a range of attractive courtyard spaces and house types resulting in a high degree of mixture of architectural form.
- The wide range of house types (ranging from one bedroom apartments to four bedroom houses) which guarantees a good social mix as well as sustainable age structure of the new population.

The Planning System and Flood Risk Management

A site-specific flood risk assessment was carried out and the footprint of the proposed development has been designed in accordance with the conclusions of the report. Please refer to the **Flood Risk report** by JBA Consulting.

Design Manual for Urban Roads and Streets

¹⁴ Section 28 of the Planning and Development Act 2000 (as amended).

The proposed road layout complies with the principles set out in the Design manual in the following ways. Please refer to a detailed description to the **Civil Engineering Report**.

- Pedestrian and cyclist permeability.
- Legible street network through a 6m wide spine road throughout the development providing vehicular access to all residential units via short cul de sac roads that are generally 5 m wide.
- Focal point at the main entrance to the scheme by apartment building.
- Appropriate curve radii and absence of long straight sections of roadway to reduce traffic speeds.
- Creation of sense of enclosure of streets as a result of general absence of front garden parking and provision of extensive tree planting.
- Attractive pedestrian based courtyard areas throughout the development where the car is subordinate to pedestrians.

Design Standards for New Apartments - Guidelines for Planning Authorities

These guidelines provide for specific minimum standards in relation to apartments. Please refer to the **Compliance Schedule** by Gleeson McSweeney, Architects.

The planning authority notes that the site is considered to be an 'Intermediate Urban Location' as per the relevant Government planning guidelines. An 'Intermediate Urban Location' is defined in the Guidelines as a site which is within reasonable walking distance of either: a town or suburban centres or employment location; a high capacity urban public transport stop or high frequency urban bus service; or reasonably frequent urban bus services. It is considered that the site does not meet any of these criteria as the local shopping facilities do not constitute a suburban shopping centre while the local bus service does not meet the frequency threshold.

Part V Guidelines

For residential development projects, the requirements in relation to social housing provision must be considered at planning application stage. Under legal requirements the applicant must indicate in the planning application what is the proposed option to comply with the Part V requirements, i.e.: either (i) transfer of part of the site, (ii) build and transfer (or lease) a number of dwelling units on the site, or (iii) transfer (or lease) of dwelling units elsewhere. To satisfy Part V obligations the applicant has specified 38

units to be allocated as social units. This represents 10% of the total number of dwelling units. The units will be spread across the development scheme. Please refer to the **Part V Compliance Letter** received from the Housing Development Directorate in the local authority which has been included in the planning application documentation and relevant **drawing no. 1704-10-107**.

Urban Development and Building Heights Guidelines for Planning Authorities

Under these Ministerial Guidelines, there is a presumption ..."in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility."¹⁶ For housing developments outside city and town centres and inner suburbs, the Guidelines advise that development schemes should comply with the following criteria¹⁷:

- Deliver medium densities, in the range of 35-50 dwellings per hectare net.
- Address the need for more 1 and 2 bedroom units while at the same time providing for the larger
 3, 4 or more bedroom homes across a variety of building typology and tenure options.
- Provide attractive street-based traditional town environment with a good sense of enclosure, legible streets, squares and parks and a strong sense of urban neighbourhood.
- Include an effective mix of 2, 3 and 4-storey development while 4 storeys or more can be accommodated alongside existing larger buildings or trees and parkland.

The proposed scheme complies with these criteria and provides for a wide variety of designs and building heights vary between two storey and four storey.

Childcare Facilities Guidelines

For new housing areas, a guideline standard of one childcare facility providing for a minimum 20 childcare places per approximately 75 dwellings is recommended. However, the guidelines state that this is a guideline standard and will depend on the particular circumstances of each individual site. It is noted that although there are a number of childcare facilities in the vicinity of the site, many of these appear to have limited capacity. It is therefore proposed to provide a dedicated childcare building within the proposed scheme. In addition having regard to the extension of the Early Childhood Care and Education (ECCE) Scheme in 2016 which provides free childcare from age three until children go to primary school,

¹⁵ Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, Dept. of Housing, Planning and Local Government, December 2020, p. 6.

¹⁶ Urban Development and Building Heights, Guidelines for Planning Authorities, Government of Ireland, December 2018, P. 13.

¹⁷ Urban Development and Building Heights, Guidelines for Planning Authorities, Government of Ireland, December 2018, P. 16.

¹⁸ Childcare Facilities Guidelines for Planning Authorities, Government of Ireland, June 2001, p. 9.

and the roll out of the National Childcare Scheme from October 2019, the Government encourages an increase in capacity to facilitate the expansion that will be required to cater for the predicted demand for this service.

With regard to the need for childcare places for apartment units it is relevant to note that the Planning Guidelines for Apartment Developments recommend that ..." One-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms." 19

The capacity of the childcare facility is based on the assumption that for one bed units no spaces are required. The total requirement for the proposed childcare facility is estimated to be ca. 66 places. Please refer to the separate **Childcare Demand Analysis report**²⁰.

Appropriate Assessment Guidelines for Planning Authorities

Under these guidelines the applicant is required to undertake an assessment of the site and potential threats to special interest areas within its vicinity. Please refer to the **Appropriate Assessment Screening report and Natura Impact Statement** prepared by SLR consultants that has been included with the planning application documentation.²¹

Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment.

Although the proposed scheme provides for less than the threshold of *more than 500 dwelling units* to require an Environmental Impact Assessment, it does exceed the site area threshold as the application site is just above the 10 hectare threshold for areas outside a business district.²² An **Environmental Impact Assessment Report** has been included with the planning application documentation.

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¹⁹ Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, Dept. of Housing, Planning and Local Government, March 2018, p. 21.

²⁰ Childcare Demand Analysis, R W Nowlan & Associates, December 2021.

²¹ Appropriate Assessment Screening report and Natura Impact Statement, SLR Consulting, December 2021.

²² Planning and Development Regulations 2001-2019, Schedule 5, Part 2, class 10 b, i and v.

7.0 COUNTY DEVELOPMENT PLAN

In September 2015, in accordance with Section 28 of the Electoral, Local Government and Planning and Development Act 2013, the Planning Authority proposed not to commence the review of the Limerick County Development Plan 2010 - 2016 and the Limerick City Development Plan 2010 - 2016. Therefore the County Development Plan will continue to have effect until a new Development Plan for Limerick City and County is prepared.²³ The relevant development plan for the site is therefore the Limerick County Development Plan 2010-2016 (as extended). However, a draft County Development Plan has been prepared and is likely to be adopted in 2022. The zoning objectives have not changed.

Under the County Development Plan it is required to submit a 'Sustainability Statement and Social Infrastructure Assessment' (SSSIA). A checklist of information to be contained in each relevant planning application outlining compliance with the principles of sustainability and the availability of social infrastructure in the vicinity of any proposed developments.²⁴ Please refer to Appendix B for the full checklist. In addition, please refer to the **Architecture Report and Urban Design Statement** which includes a full list of services in the area with the distance to these.

Under the County Development Plan it is required to submit a Design Statement for major development proposals. The statement should ..."address all relevant development plan or local area plan design policies and objectives, and relate them to the site. The design statement could outline a justification for the development as proposed and any alternative design options considered."²⁵ Please refer to the attached Architecture Report and Urban Design Statement.²⁶

The county development plan sets outs a number of development management guidelines for urban residential developments.²⁷ These are addressed as follows:

- *Density.* The proposed development meets density standards of the development plan (min. 33 dwellings per hectare) and subsequent density standards under national guidelines.
- *Design*. The development plan refers to national guidelines on sustainable housing. The development meets the standards set out under these guidelines as addressed elsewhere in the Statement of Consistency. Please refer to the **Architecture Report and Urban Design Statement** for further details about the proposed design approach.
- Space between dwellings. A minimum distance of three metres between dwellings is achieved.

²³ Limerick.ie website

²⁴ Limerick County Development Plan 2010-2016, Vol. 1, p. 10-3.

²⁵ Limerick County Development Plan 2010-2016, Vol. 1, p. 10-6.

²⁶ Architecture Report and Urban Design statement, Gleeson McSweeney Architects, November 2021.

²⁷ Limerick County Development Plan 2010-2016, Vol. 1, Table 10.1, p. 10-9.

- Front garden length. The garden length in many cases is less than the stated six metres, but defensible space is provided in all cases and building lines adhere to a coherent design approach. For further details please refer to the Architecture Report and Urban Design Statement.
- Rear garden length. The minimum back to back distance between dwellings of 22 metres is achieved.
- *Open space*. The proposed development provides for 28 % of the site area as public open space excluding incidental open space areas. This exceeds the minimum standard of 15%.
- Boundary fences/walls. Please refer to the Architecture Report and Urban Design Statement for details. All private amenity areas where they adjoin public roads are screened from public view.
- Car Parking. Under the county development plan standards the following number of car parking spaces should be provided: one space per dwelling with 3 bedrooms or less, two spaces for dwellings with 4 bedrooms or more, plus one visitor space per three dwellings. For apartments the standards are: one space per apartment with two bedrooms or less, 1.5 spaces for apartments with 3 bedrooms or more, plus one visitor space per two apartments. In addition there would be 26 car parking spaces required for the creche. Under these standards the total number of required car parking spaces would be: 235 for the houses and 292 for the apartments plus 26 spaces for the creche; a total of 553 spaces. A total of 377 spaces has been provided. While this is less than required under the development plan standards, this provision is considered to meet the requirements under Government Planning Guidelines. See for full details the Architecture Report and Urban Design Statement.
- Landscaping. A detailed Landscape Specification Report is included with the planning application documentation. Please refer to this report. The vast majority of the existing tree / shrub population within the development boundary will have to be removed to facilitate the proposed high density development. The overall loss of trees is not considered significant. Please refer to the Tree Survey and Arboricultural Impact Assessment report.²⁹
- *Biodiversity*. Please refer to the **EIAR Chapter on Biodiversity** that is included with the planning application documentation.
- Archaeology. The site is outside any area of Archaeological Potential. However, an archaeological
 impact assessment has been undertaken. Please refer to the EIAR Chapter on Cultural Heritage
 that is included with the planning application documentation.
- *Recycling*. Appropriate waste bins will be provided to households and locations for collection points along the spine road are identified in the site layout. Please refer to **Drawing 1704-10-102**.

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²⁸ Limerick County Development Plan 2010-2016, Vol. 1, p. 10-44.

²⁹ Tree Survey and Arboricultural Impact Assessment, SLR Consultants, December 2021.

- Services. Please refer to Civil Engineering Report.
- Roads. Please refer to Civil Engineering Report.
- Transport and Traffic Impact Assessment. Please refer to the EIAR Chapter on Traffic and Transportation that is included with the planning application documentation.

The road layout is based on a single access point from the existing roundabout on the regional road in the western boundary. The county development plan states in relation to road layouts: ..." Provision of cul-desac developments should be avoided unless they form part of a well connected road network. Connected road networks help reduce the sense of isolation and encourage walking and cycling." Most of the dwelling units are accessed from an internal spine road with cul desac roads forming shorter sections. The development is therefore not a typical cul desac layout. A green network of public open space areas follows this internal spine road. Pedestrian connections throughout the layout are provided through the areas of open space thus providing for maximum permeability for cyclists and pedestrian within the overall development.

The development plan requires new housing developments to: ..."prioritise walking, cycling and public transport, and minimize the need to use cars."³¹ In relation to permeability and linkages with existing development in the area the county development plan states the following: ..."Possible linkages with existing and future residential developments and community and service facilities will be encouraged whether by pedestrian links, cycle ways or locating open space adjacent to existing development subject to good design and high levels of natural surveillance for safety and security. The applicant will be required to submit an assessment of the connectivity of the proposal with existing development and facilities."³² Given the difference in site levels it is difficult to achieve linkages with the existing residential development to the south of the masterplan lands. However, in accordance with advice in pre-planning consultation, provision is made for such linkages at the eastern site boundary.

8.0 SOUTHERN ENVIRONS LOCAL AREA PLAN 2021-2027

This Local Area Plan came into effect in May 2021. The zoning objectives are the same as in the Limerick City and County Plan 2022 which has not yet been adopted. However, as the Local Area Plan has been adopted these zoning objectives apply. Under the zoning objectives, the large part of the site is zoned 'New Residential' with small sections along the periphery of the site within the area that is zoned 'Open

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³⁰ Limerick County Development Plan 2010-2016, Vol. 1, p. 10-8.

³¹ Limerick County Development Plan 2010-2016, Vol. 1, p. 4-9.

³² Limerick County Development Plan 2010-2016, Vol. 1, p. 10-9.

Space and Recreation'.³³ However, no houses are situated outside the area zoned residential. Please see **Site Layout Plan** which shows the boundary line of the residential zoning objective as an orange coloured dotted line.

In relation to minimum densities the Local Area Plan states that a minimum density of 35 dwelling units per hectare will apply unless the development site is a brownfield, infill or greenfield site within 800m of the University Hospital and Raheen Business Park, and within 500m of a bus stop. In that case a minimum density of 45 units per hectare would apply.³⁴ As the site is not within the definition of the higher density sites, the density threshold of 35 dwellings per hectare is achieved. However, higher densities than this threshold have been applied in accordance with the Opinion from An Bord Pleanala on the preapplication consultation.

Notwithstanding the difficulties to create pedestrian connections through the adjoining residential developments as a result of differences in site levels, maximum permeability for pedestrians is provided through a footpath connection in the eastern boundary of the site. This will facilitate desire lines to nearby shopping and childcare facilities. Also, the pedestrian and cycle route via the existing roundabout entrance to the development provides a 'shortest route' to nearby shopping facilities to residents living in the western half of the proposed development scheme.

Objective CI016 of the Southern Environs Local Area Plan 2021-2027 states: ..."Ensure new residential development provides high quality public open space and play-lots proportional to the number of residential units, having cognisance to accessibility, safety, permeability, place-making and the Open Space Hierarchy requirements set out under Table 3 of Chapter 7 Housing of this LAP."³⁵ The layout, distribution, hierarchy and functionality of public open space within the development is in compliance with this policy objective. In this regard the following should be noted:

Quality public open space: ..."A variety of interesting spaces are created, by incorporating various squares and open spaces, so as to have ever changing aspects, for the mind to absorb, as one travels from one area to another."³⁶

Play areas: ..."A large playground is proposed in the north-western corner of the site and together with this, it is proposed to have individual exercise equipment and children's play equipment, strategically placed along the large open space which circles the development from the entrance roundabout, at the

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³³ Southern Environs Local Area Plan 2021-2027, Zoning Map.

³⁴ Southern Environs Local Area Plan 2021-2027, p. 33.

³⁵ Southern Environs Local Area Plan 2021-2027, p. 48.

³⁶ Architecture Report and Urban Design statement, Gleeson McSweeney Architects, November 2021, p. 5.

south-west corner to south-east corner, where the application site about the existing Ballinvoher Estate."³⁷

Accessibility: Roads and footpaths connect all large and small areas of public open space while some open space acts as walking routes through the development.

Safety: All open space areas are directly overlooked from adjoining houses and are separated from the public road by footpaths in all cases. Please refer to the site layout plan.

Permeability: ..."the development has been designed on a grid format, which incorporates greater permeability, thereby allowing people to visit other people in the estate, access public open spaces and enter and leave the estate, by walking or cycling, the near shortest desired route possible, and thus encouraging social interaction between people." ³⁸

Place-making: each area of public open space in the site layout provides a way of defining the local areas and acts in combination with the building lines and layout of adjoining houses to create a clearly defined local character area.

The Open Space Hierarchy requirements set out in the Local Area Plan³⁹ are met in the proposed development as follows:

- Play lot/ pocket park primarily for play for younger children spread throughout the development
- Small Park to accommodate a small playground with a minimum of 4 play features, kick around space, and passive recreation. This is provided in the north western corner of the development.
- Local Park This is provided in the form of the Mungret Neighourhood Park.

9.0 PRE-APPLICATION MEETINGS

Three section 247 pre-planning meetings with the planning authority were held in 2018 in relation to an earlier version of the proposed development. These meetings took place on: 3/7/18, 10/8/18, 6/11/18. During these meetings a number of important principles were agreed that formed the basis for the further design of the proposed development. These principles can be summarised as follows:

• The LAP neighbourhood park objective is no longer relevant.

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³⁷ Architecture Report and Urban Design statement, Gleeson McSweeney Architects, November 2021, p. 7.

³⁸ Architecture Report and Urban Design statement, Gleeson McSweeney Architects, November 2021, p. 3.

³⁹ Southern Environs Local Area Plan 2021-2027, Table 3 – Open Space Hierarchy, p. 38.

- While a master plan can show future development options for the entire lands, development for zoned lands can only be considered at this stage.
- Densities must be at least 35 dw/ha.
- Connections for pedestrians and cyclists to adjoining development to the south must be provided where possible.
- A capacity study for childcare facility must be done.
- The surface water issue must be shown to 'work' in terms of connection across the railway line and the open attenuation pond.

Following the third pre-planning meeting, the scheme was temporarily deferred pending resolving issues relating to the intentions of the applicant and land ownership. An updated scheme was presented in a fourth pre-planning meeting that was held on 10/12/19. **Minutes of this S247 meeting** are attached. Please refer to these minutes.

The issues raised in all pre-planning meetings are addressed as follows.

Future proofing of site layout.

The adjoining lands to the north east are zoned open space. At the first pre-planning meeting the applicants stated the intention to continue the development into these lands in order to provide a coherent masterplan of residential development between the railway line and existing residential development to the south. However, as these lands are currently zoned open space, the applicants were advised to restrict the planning application to the lands that are zoned for residential development and exclude the open space zoned lands. The site layout has achieved this while allowing for connection to future development to the north east through the design of the spine road near the eastern site boundary. It is envisaged that separate vehicular access could be provided from the east for the development on these lands. The proposed development scheme has therefore been 'future proofed' in accordance with the advice of the planning authority as stated in the minutes. Please refer to the attached Masterplan layout drawing no. 1704-10-103.

Density

The planning authority notes that the site is considered to be an 'Intermediate Urban Location' as per the relevant Government planning guidelines. And the applicant is advised to give strong justification for the proposed lower density. This issue has been addressed in relation to the S28 Guidelines in this Statement of Consistency. It is concluded that the density is appropriate given the location of the site in relation to

public transport and town centre facilities in the area. However, the density of the Scheme has been increased in response to the pre-application consultation with An Bord Pleanala.

Road layout

The road layout that has been adopted in the proposed scheme is the result of detailed consultation with the planning authority. It is noted from the minutes of the pre-planning meeting that the planning authority is satisfied that the road layout is appropriate in providing a clear road hierarchy (with a 6 metre wide spine road throughout the development), preventing unnecessary cul de sac roads, providing appropriate waste bin locations and the entrance to the crèche being compatible with the nearby roundabout entrance to the scheme. The road layout has been designed to comply with DMURS. See **Civil Engineering Report** for further details.⁴⁰

Surface Water attenuation

Originally, it was proposed to provide a lake to accommodate the attenuation capacity of surface water. This lake would be located in the northern portion of the site within the flood risk demarcated area and was intended to form an integral element of the public open space. However, based on concerns from the planning authority it is now proposed to provide underground tanks. Please refer to **Civil Engineering Report** for further details.

Traffic noise

It is noted that the taller buildings along the western boundary of the site will have a screening effect and reduce levels in the open spaces areas and private gardens in the central port of the site. Principles of good acoustic design have been applied to the buildings in the proposed development where higher noise levels will prevail. Please refer to the **EIAR Chapter on Noise and Vibration** that is included with the planning application documentation.

Open Space

The area that is zoned open space and is within the ownership of the applicant has been included within the site curtilage. Adjoining lands to the east of the site that are currently zoned open space have not

⁴⁰ Civil Engineering Report, Hutch O'Malley Consulting Engineers, December 2021.

been included in the site curtilage as future proposals for residential development may be developed as agreed with the planning authority. To this end the applicant did make a submission to a review of the development plan but the land has remained zoned open space.

Location of six storey apartment block.

The applicant noted the concerns by the planning authority about the location and design of the apartment block. The originally proposed six storey apartment block was omitted in a revised site layout. Further design modifications resulted in response to the pre-application consultation with An Bord Pleanala.

10.0 CONCLUSIONS

- The proposed development is on land zoned for residential development in the Southern Environs Local Area Plan 2021-2027 and is therefore in accordance with the zoning objectives of the relevant statutory plan. The development meets all relevant development management standards as set out in the City & County Development Plan.
- The proposed layout provides for an opportunity to link and extend the development to adjoining lands to the east should these lands be zoned for residential development at a future date.
- The proposed development meets objectives in the National Planning Framework and the Regional Strategy incl. the Metropolitan Area Plan, to achieve compact urban development and develop lands in a sequential manner, having regard to the location of the site between suburban development and the city of Limerick.
- The proposed layout is in accordance with all relevant National Planning Guidelines, in particular guidelines on sustainable residential development meeting the urban design criteria set out in the manual, apartment and building height guidelines and design manual for urban roads and streets.
- The proposed development meets requirements under national planning guidelines in relation to childcare facilities and the provision of social housing.
- An Environmental Impact Assessment Report has been completed and is included with the planning application documentation.

- A Natura Impact Statement has been completed and is included with the planning application documentation.
- While part of the site is in a flood risk zone, no residential development or other development is proposed in this zone.
- Pre-application meetings have taken place with the planning authority and the development scheme has progressed in accordance with the guidance that was obtained in the meetings.
- A pre-application consultation has been completed with An Bord Pleanala and the proposed development includes design modifications in response to the Board's Opinion.

Appendix A – Assessment under Urban Design Manual

01 CONTEXT					
Indicators	Evolved naturally as part of the surroundings				
	Appropriate increase in density				
	Positively contributes to the character and identity of the area				
	Appropriate response to boundary conditions				
Assessment	The proposed development achieves sequential development by developing an undeveloped area between the city and existing suburban development to the south. The development layout has evolved from the conditions of the site boundaries as follows: to the north the extent of the development is defined by zoning objectives and flood risk area, to the south it adjoins existing residential development and to the west it is defined by an existing regional road. The proposed development achieves a significant increase in density compared to adjoining development as a result of a different housing mix as well as compact road layout.				
	02 CONNECTIONS				
Indicators	Attractive routes in and out for pedestrians and cyclists				
	Located in a in/near a mixed-use centre				
	Site layout allows for buses to service the scheme				
	Links to existing movement routes				
	Appropriate density to support efficient public transport				
Assessment	The scope for pedestrian and cycle routes is largely determined by existing development and site levels. There are limited opportunities to achieve routes to the south and west due to the regional road and existing development. However, significant potential exists for integration of the public open space lands adjoining the former railway line and the possible future integration of a 'greenway' if this is achieved along the disused railway line. As such the development will contribute to improved connectivity of existing development to the south with the city of Limerick. The density is appropriate given the location of the lands and established densities in the vicinity, with highest densities provided near the entrance to the development closest to public transport.				
	03 INCLUSIVITY				
Indicators	Provide a range of public and private amenity spaces				
	Design and layout enable access by all				
	New buildings present a positive aspect to passers by				
Assessment	The site layout provides for a range of attractive courtyard spaces around which housing development is situated. These courtyard spaces are accessed by a continuous spine road thereby reducing cul de sac traffic movements. The different building designs of houses and apartments provide a varied streetscape with additional architectural emphasis near				

	the entrance roundabout as a result of the childcare building, detached house and build to rent apartment block.			
	04 VARIETY			
Indicators	Activities generated by development contribute to the quality of life in its locality			
	Uses are compatible with the area			
	Housing types and tenure increase choice available in the area			
	Opportunities to provide shops and services complementary to the area			
Assessment	The proposed scheme provides a wide range of house types (ranging from studio apartments to five bedroom houses) which guarantees a good social mix as well as sustainable age structure of the new population. Having regard to the existing shops and facilities in the vicinity the development does not introduce such facilities in order to minimise competition with the exception of a childcare facility. This childcare facility is located to maximise scope for use by not only residents in the proposed development but also existing residents in adjoining developments. While most trips will take place on foot, the location also ensures that those from outside the development who travel by car will have minimal impact on the traffic levels within the proposed scheme.			
	05 EFFICIENCY			
Indicators	The proposal looks at the potential for high density			
	 Landscaped areas are designed to provide amenity, biodiversity and sustainable drainage 			
	Scheme layout to exploit solar gain			
	Design ensure productive use of the land			
Assessment	The proposed scheme has a density that is considered appropriate in view of the location of the site, availability of public transport and established densities in the vicinity. Over 50% of the site boundary adjoins public parkland and the landscaping scheme ensures that treeplanting within the scheme is closely linked to this parkland.			
	06 DISTINCTIVENESS			
Indicators	Recognisable features, enabling place attachment			
	Positive addition to the locality			
	Discernible focal point to the scheme			
Assessment	The scheme is a repeat application for a previous grant of planning permission. While, the density has been significantly increased compared to the previous permission, many features are determined by the existing development to the south and the regional road and roundabout entrance along the western site boundary.			
	07 LAYOUT			
Indicators	Layout aligns routes, creates permeable scheme that's easy to navigate			

	Block layout provides public space to the front of building and semi-private open space to the back			
Assessment	The layout of the scheme provides good permeability within the development by creating a network of courtyards, local access roads and pedestrian laneways. These areas are connected by a spine road that runs throughout the development. As a result, the overall development is easy to navigate for a visitor, with attractive areas of public open space that are all overlooked by local residents in the development.			
	08 PUBLIC REALM			
Indicators	Is overlooked by dwellings			
	Is a usable integrated part of the scheme			
	Roads and parking are considered as part of the public realm strategy			
Assessment	All areas of open space are overlooked by dwellings and apartments. The public road combined with public open space areas provides for a public realm that is fully accessible and integrated throughout the scheme. Car parking is largely provided in clusters that are designed to form part of the public realm. Reduced front garden depths achieves an increase in density while maintaining maximum scope for private open space that is not overlooked.			
	09 ADAPTABILITY			
Indicators	Homes are energy efficient			
	Design exploit good practice lessons so that house types can be adapted			
Assessment	The units are designed to highest design standard to ensure their energy performance. All houses have private rear gardens allowing for future extensions. Attic space is designed so that it can be converted at a later stage if required.			
	10 PRIVACY AND AMENITY			
Indicators	Each home has access to useable private outdoor space			
	Design maximises dual aspect potential			
	Designed to mitigate sound transmission			
	Windows sited to mitigate overlooking and afford privacy			
	Homes are designed to include adequate storage			
Assessment	All houses have private gardens that are not overlooked from the public area			
	11 PARKING			
Indicators	Secure, safe parking is provided			
	Parking is provided communally and can accommodate visitors			
	Materials used for parking are of similar quality to rest of scheme			

	Adequate, secure bicycle parking	
Assessment	All car parking is provided in clusters either adjacent to the spine road or easily accessible from the access roads off the spine road. Most clusters are overlooked from nearby houses or apartments. Car parking along the spine road is designed to accommodate visitors but also people from outside the development who wish to visit the public parkland north of the site.	
	12 DETAILED DESIGN	
Indicators	 Material and design contribute positively to the locality Landscape design facilitates use of open spaces 	
	Building design will facilitate easy maintenance	
Assessment	The overall scheme will contribute positively to the area providing development on a site that has been zoned for development and provide high quality housing units and quality public realm.	

Appendix B - Sustainability Statement and Social Infrastructure Assessment

TRANSPORTATION:

- Railway Station and/or feeder links to other areas. The Limerick Colbert Station is less than 5km from the development site (10 minute drive by car). Limerick (Colbert Station) has a very regular service to Limerick Junction, which is on the Dublin/Cork main line. It has a direct line to Ennis and this line continues on to meet the Dublin/Galway main line at Athenry.
- **Bus Station / Bus Stop and/or feeder links to other areas.** The 304A travels along the Fr. Russell Road and there is a bus stop either side of the road at the city side of the Racefield Neighbourhood Retail Centre. From the roundabout, at the entrance to the application site the bus stop is 489m, that is by travelling along the perimeter footpath around Inis Mor and up along Fr. Russell Road. People at the opposite end of the application site i.e. eastern side, can travel through Ballinvoher Estate and down along Fr. Russell Road, the distance from the eastern side of the application site to the bus stop is 420m.
- Park and Ride Facilities. Indications are that a Park and Ride facility is to be proposed near the
 Dock road interchange 5mins walk to the North of the site. The draft Metropolitan plan was due to
 be issued at the beginning of April 2020 but is now delayed.
- **Taxi Services.** All city taxis would serve the area. There is a very good taxi service in the area due to UHL and the Crescent Shopping Centre being close by.
- Cycle ways or provision for cycling. Provision is made for cycle lanes along the western and northern site boundaries. These cycles lanes will integrate with existing and proposed cycling networks as per the statutory plans. In addition, cycling storage facilities are provided within the proposed development scheme in accordance with relevant standards.
- Footpaths. From the roundabout at the entrance to the development site, there is a footpath either side of the road heading in the direction of Raheen, there is no footpath going in the direction of the Dock Road, but the development includes provision of a footpath along the front of the development site. The aforementioned footpaths heading in the direction of Raheen lead all of the way to the various amenities/services, such as Mungret Neighbourhood Park, schools, Raheen Industrial Estate, Hospital, Crescent Shopping Centre etc. Paths proposed are 2m wide, connectivity to the adjacent estate provides permeability. Internally linkage via open areas and shared surfaces favours pedestrian movement.
- Pedestrian Lights and pedestrian crossings. There are existing pedestrian crossings the whole way
 around the Quinn Cross Roundabout i.e. roundabout at end of Fr. Russell Road. There are
 pedestrian crossings, outside Mungret Neighbourhood Park and St. Nessan's National School.
 Within the proposed development, a public crossing is proposed at the existing entrance
 roundabout. Internally primarily the crossing points are raised and level with the paths to
 encourage low road speeds and favour the mobility impaired.
- Traffic Calming Measures. The development includes internally raised crossing points. The geometry includes tight radius bends and chicanes to reduce speed and alleviate traffic. Where possible roads are narrowed to 5.5m.
- Pedestrian and cycle permeability and connectivity within proposal and with existing community facilities. A short footpath connection is proposed in the eastern site boundary to facilitate pedestrian and cyclist permeability with the adjoining residential development. This footpath will connect to a public road and while it is partly outside the site boundary, the lands are in the control of the applicant. The layout of the scheme provides good permeability within the development by creating a network of courtyards, local access roads and pedestrian laneways. These areas are connected by a spine road that runs throughout the development. As a result, the overall development is easy to navigate for a visitor

- Provision for inclusive access to cater for people who are mobility impaired. All areas of the
 application site will be accessible to people with disabilities, including all open spaces and squares,
 and dropped kerbs will be provided at all road junctions, all crossings have adequate blister and
 level crossings are proposed where possible. All houses and apartments are designed with
 disabled access provided and with disability access toilets at access level. 14 no. retirement homes
 are proposed, with disabled parking located directly in front of the dwellinghouses.
- Measures to minimise dependence on the car. Absolute minimum parking spaces have been
 provided to comply with the development plan. Bicycle parking is provided along with additional
 exclusive traffic separated bicycle paths are provide around the North and West of the site. Secure
 bicycle storage has been provided for all residents and bicycle racks will be provided for visitor's
 bicycles.

ENERGY:

- Compliance with BER standards. While separate from planning legislation, the houses and apartments will fully comply with Building Control legislation, including the recently introduced Part L 2019 Conservation of Fuel & Energy Dwellings.
- Details of how the proposal will minimise energy demand and levels in building design, location
 and orientation. The enclosing envelope of the properties will be insulated as required under the
 Building Control legislation, no fireplaces will be installed and the heat source will be through an
 air to water exchanger. Where possible apartments have been designed with duel aspect
 windows, and the majority of apartments have south and west facing windows.
- Indicate any re-use / renovation of existing buildings. There are no existing buildings within the site or in the immediate vicinity.
- Details of other sustainable design approaches/renewable energy technologies. As outlined above.
- Use of renewable materials in construction. It is proposed to utilise traditional and renewable materials, as much as possible throughout the proposed development. The exterior of the houses will be finished with either a painted smooth plaster, selected clay or concrete brick, or a timber effect cladding as manufactured by AMS Architectural & Metal Systems Ltd. It is proposed to use this form of cladding as it is visualised that a large number of the properties may be let, and this form of cladding is virtually maintenance free, and thus will continue to keep its appearance into the future. All roofs will be covered with dark coloured slates or tiles, with matching ridge tiles. The windows will be double/triple glazed pvc or aluminium.
- **Proposals to minimise construction waste.** A detailed construction management plan will be submitted with the planning application which ensures management of construction waste in accordance with best practice.
- Proposals to recycle waste. Appropriate waste bins will be provided to households and locations
 for collection points along the spine road are identified in the site layout. For the build to rent
 units waste recycling will be optimised through the management plan that will be submitted with
 the planning application.
- Can the development through both design and layout make use of a municipal or district heating system? This is not possible.
- Indicate the location of the nearest recycling facility to the proposed development. There is a recycling centre approximately 1.5 km from the site located within the grounds of the Mungret Civic Amenity Centre.

ECOLOGY

• Retention, protection and integration in the proposal of any natural features. The development site is greenfield land with no significant natural features present. As such, the proposed

development will significantly improve the aesthetic value of the area through the creation of new, valuable features within the site.

- Will the development protect bio-diversity and use native species? The site has limited bio-diversity value. However, the detailed landscaping plan and tree planting scheme provides for maximum opportunities to use native species and provide ecological linkages between the open space adjoining the development site to the north and east and the open space network internal to the scheme. This will include linkages to the river corridor.
- **Details of a management scheme for on-going ecological conservation.** The landscaped areas will be taken in charge by the local authority.
- Develop a green framework linking urban areas and surrounding countryside. The detailed landscaping plan and tree planting scheme provides for maximum opportunities to provide ecological linkages between the open space adjoining the development site to the north and east and the open space network internal to the scheme. This will include linkages to the river corridor.
- Demonstrate that green areas are provided where they will provide maximum enjoyment and form an integrated part of the building design. Please refer to Site Layout Plan for full details of greenspace location within the development. 16.6% of the overall development site is open space.
- Show how water quality will be protected during construction and after completion of the development. Significant silt fences and hydrocarbon separators are proposed for the construction phase along with the long term river protection by limiting runoff to greenfield rate and protection using inline full retention hydrocarbon interceptors.
- Does the location, orientation and design of external lighting in particular minimise light spill into nearby habitats? External lighting will be designed to avoid any unnecessary light spill in to neighbouring developments.

DESIGN

- How does the proposed design relate to the principles of urban design from the document 'Sustainable Residential Development in Urban Areas' May 2009 and the accompanying 'Urban Design Manual A Best Practice Guide'? Please refer to Appendix A in this Statement of Consistency.
- Submit a design statement. Please refer to the Design Statement by Gleeson McSweeney, Architects.
- The detail of the design statement shall be proportionate to the size or complexity of the proposed development. Please refer to the Design Statement by Gleeson McSweeney, Architects.
- Show how the proposal promotes sustainable approaches to housing developments by spatial planning, layout, design and detailed specification. The proposed development does not extend the urban form into the open countryside, due to the fact that, for well over a decade the land to the west of the application site i.e. furthest from the city centre has been developed with 2 housing estates, presently they consist of over 200 houses. The adjoining land to the south is fully developed with residential estates and the adjoining land to the north and east is zoned Open Space & Recreational. The application site is very well located, being close to a substantial Neighbourhood Park, a large hospital, a number of schools within walking distance, the largest shopping centre in Munster and several sports facilities.

The proposed development is designed to cater for all walks of life, so as to be always relevant and sought after. The layout adopts the objectives of DMURS, with a grid formation of intersecting streets to facilitate walkers and cyclists, so that they can take the shortest route. Prioritising pedestrians is a theme throughout the estate, with road design, junction design and raised crossings to slow motorised traffic down. The dwellinghouses have been designed to form streetscapes, as opposed to individual units. In this regard, it is their contribution to the streetscape that is emphasised, over individual standout features. To this effect, the dwellinghouses have been kept simple and balanced, with very limited salient projections. To be all inclusive, a large range of house and apartment types and sizes is proposed, ranging from 2 bedroom to 5 bedroom houses and studio to 4 bedroom apartments, all intermingled to promote inclusiveness and social

cohesion. All dwellinghouses are located so that there is a minimum of 22m between first floor windows facing one another. While the retirement homes have shorter back gardens, as the occupants may not be in a position to maintain a large garden, all of these dwellinghouses have no first floor windows facing in the direction of these shorter gardens. It is a design feature throughout the development that insofar as possible, parked cars have been removed from street views. This has been achieved by removing car parking from in front of houses, by (1) providing car parking to the side of houses, (2) providing car parking to the rear of houses, accessed either through or around the house and (3) providing grouped car parking in well landscaped, less dominant locations. This design feature allows for reduced front gardens, which again, contributes to the streetscape theme throughout the development. The distance between houses is mainly 3m or more, but in areas is reduced, to again contribute to the appearance of the streetscape. All apartments comply with the requirements of Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authority 2018, in this regard, an **Accommodation Compliance Schedule** is enclosed.

It is proposed to utilise traditional and renewable materials, as much as possible. The exterior of the houses will be finished with either, a painted smooth plaster, selected clay or concrete brick or a timber effect cladding as manufactured by AMS Architectural & Metal Systems Ltd. It is proposed to use this form of cladding, as it is visualised that a large number of the properties may be let, and this form of cladding is virtually maintenance free, and thus will continue to keep its appearance into the future. All roofs will be covered with dark coloured slates or tiles, with matching ridge tiles. The windows will have vertical emphasis and be double/triple glazed pvc and aluminium, in a grey colour, RAL 9007. Doors will be in various colours, to add to the streetscape. Where dwellinghouses have more than one elevation facing the public realm, they have been made duel aspect, so as to properly address the roads and public areas they face.

- Demonstrate how the development has provided a housing mix to cater for different household types and age groups and caters for affordability. The development scheme includes a wide range of house types ranging from studio apartments to five bedroom houses. This guarantees a good social mix as well as sustainable age structure of the new population.
- Demonstrate consideration of the housing needs of persons with disabilities, special needs and elderly
 within the proposal and that it is guided by the principles of "universal design". All houses and
 apartments are designed with disabled access provided and with disability access toilets at access level. 14
 no. retirement homes are proposed, with disabled parking located directly in front of the dwellinghouses.
- Submit a mobility and disability statement for the proposed development. All houses and apartments are designed with disabled access provided and with disability access toilets at access level. 14 no. retirement homes are proposed, with disabled parking located directly in front of the dwellinghouses.

SOCIAL QUALITY

- Demonstrate how the proposed development contributes to social integration. The development scheme includes a wide range of house types ranging from studio apartments to five bedroom houses. This guarantees a good social mix as well as sustainable age structure of the new population. Part V units for social housing are dispersed throughout the proposed development. A footpath connection is provided to connect the proposed development with existing residential communities in the area. The proposed childcare facility can accommodate needs for the existing as well as new population.
- Show all existing schools, crèches, community and recreational facilities, medical and health care services in the area, the distance of each from the application site and how the proposed development relates to each of these facilities (preferably shown on a map). Pending the closure of schools during the Corona virus period, this information will be provided at a later stage as part of the full planning application.
- Demonstrate that sufficient capacity exists within local crèches and schools serving the area in line with appropriate guidelines i.e. the numbers of children/students enrolled in the crèche / school in the current academic year vis a vis the maximum numbers capable of being accommodated – contact with

crèches/ schools / Department of Education will be required. Pending the closure of schools during the Corona virus period, this information will be provided at a later stage as part of the full planning application. A childcare facility is provided to cater for demand generated within the proposed development scheme.

- If enrolment is close to or exceeding capacity please identify if the crèche/school has any plans to overcome capacity issues. Pending the closure of schools during the Corona virus period, this information will be provided at a later stage as part of the full planning application.
- Calculate the number of additional crèche/school places required as a result of the proposed development. Pending the closure of schools during the Corona virus period, this information will be provided at a later stage as part of the full planning application.