

# Sheehan Planning

44 Balnagowan, Palmerston Park, Dartry, Dublin 6

The Secretary  
An Bord Pleanála  
64 Marlborough Street,  
Rotunda,  
Dublin  
D01 V902

<b>AN BORD PLEANÁLA</b>	
LDG-	<u>033855-21</u>
ABP-	_____
<b>07 JAN 2020</b>	
Fee: €	<u>220</u> Type: <u>CARD</u>
Time: <u>17:15</u>	By: <u>HAND</u>

Thursday, 7<sup>th</sup> January 2021 [by hand]

Dear Sir/Madam,

**RE: REFERRAL OF SECTION 5 DECLARATION – LIMERICK CITY AND COUNTY COUNCIL REG REF EC56/20 – UNIT NO. 12, LIMERICK ONE, CHILDERS ROAD**

## 1.0 INTRODUCTION

Irish Life Assurance plc<sup>1</sup> have retained Sheehan Planning<sup>2</sup> to prepare this First Party Referral/Appeal against Limerick City and County Council's Declaration of 3<sup>rd</sup> December 2020 deeming that that:

A) the subdivision of unit no. 12 into three units and development of new doors (Scenario 1); and B) the subdivision of unit no. 12 into two units (Scenario 2), do not come within the scope of exempted development.

Payment of €220 representing the fee for processing this Referral/Appeal is enclosed.

A copy of Limerick City and County Council's Declaration together with the Planner's Report grounding the Declaration is attached at **APPENDIX 1**.

Documentation/Expert Reports prepared by Bannon Property Consultants and Chartered Valuation Surveyors<sup>3</sup> and Transport Insights Transport Planning Consultants<sup>4</sup> in support of this Referral/Appeal are attached at **APPENDIX 2**.

A Copy of the Cover Letter and reduced size drawings previously submitted to the Planning Authority are attached at **APPENDIX 3** (we understand from a discussion with the Board's administrative section on 7<sup>th</sup> January 2021 that we do not need to include this documentation but have done so for convenience).

The documents at Appendix 1 to Appendix 3 form part of this Referral/Appeal and we request that the Board have regard to them when determining this Referral/Appeal.

**Irish Life Assurance PLC is happy to provide any additional information as may be requested by the Board.**

<sup>1</sup> Irish Life Assurance PLC, Irish Life Centre, Lower Abbey Street, Dublin 1.

<sup>2</sup> 44 Balnagowan, Palmerston Park, Dartry, Dublin 6, D06 DC98.

<sup>3</sup> Hambleden House, 19/26 Pembroke Street Lower, Dublin 2.

<sup>4</sup> Suite 30, 21 Baggot Street Lower, Dublin 2, D02 X658.

### 2.0 GROUNDS OF REFERRAL/APPEAL

#### Declaration Sought from Planning Authority

Irish Life Assurance PLC sought a Declaration from Limerick City and County Council to establish if the following works to Unit No. 12<sup>5</sup> are exempted development (2 scenarios/proposals):

#### **Scenario/Proposal 1:**

Subdivision of Unit No. 12 into three retail units of c. 5,000 sq ft each (Unit 12A c. 4,650 sq ft; Unit 12B c. 4,585 sq ft; and Unit 12C c.6,889 sq ft). This would be achieved by constructing internal walls within Unit 12 and would also require the development of new doors at the southern and northern elevations. The new doors would mirror the form, character, and use the same materials as the existing doors.

#### **Scenario/Proposal 2:**

Sub-division of Unit No. 12 into a c. 7,000 sq ft retail unit (6,964 sq ft) and a 9,000 sq ft retail unit (9,224 sq ft)<sup>6</sup>. The 'new' units (Unit 12a and 12b) would be subdivided by an internal block wall and would be accessed via the existing entrances. No new external doors would be required

Limerick City and County Council issued a Declaration on 3<sup>rd</sup> December 2020 advising that:

*"...the said development as described above is Development and is NOT Exempt Development."*

#### Reasons Grounding Declaration as Set Out in the Planners Report

The Planner's Report provided the reasons for the Decision/Declaration and assessed the proposed works under a number of headings including 'Construction works' and 'Subdivision of Unit'.

#### Construction Works

The Planner concluded that the construction works can be considered exempted under Section 4(1)(h) as the alterations involve interior alterations for the most part and the possible provision of two doors. The Planner also considered that the external works to be consistent with the existing fenestrations and design and do not materially affect the external appearance of the structure so as to render the appearance inconsistent with the character of the structure or neighbouring structures.

<sup>5</sup> Unit No. 12 is a c. 16,275 sq ft retail unit (permitted as a retail unit and not a retail warehouse unit) that has two entrances (southern elevation) to the main carpark in the Limerick One Shopping Park.

<sup>6</sup> We note that the Retail Planning Guidelines, 2012 state that: "Specific planning and competition issues arise in relation to the size range of individual retail warehouse units and it is therefore necessary to address the separate matters of minimum and maximum unit sizes. Generally speaking, units of less than 700 M2 gross floorspace are more easily capable of being accommodated in urban centres and, in any event, tend to sell a less bulky range of goods. Consequently, planning authorities may consider it appropriate to impose a minimum size condition preventing the construction or subdivision of retail warehouse units into stores less than 700 M2 in out-of-centre locations." In this case Unit No. 12 was permitted as retail use and not as retail warehouse use (Ref 04/572) with no conditions attached to the permission limiting/restricting subdivision of the unit in Ref 04/572 – see Figure 1). Subdivision of retail warehousing units as outlined in the Retail Planning Guidelines for Planning Authorities, 2012 does not therefore arise here.

Planning application details ref: 04770572 Limerick City and County Council

Decision Progress Indicator 100%

Received 21/12/2004 Decision 02/06/2005

Details	Applicant	Development	Comments	Decision	Appeal
<b>Decision</b>					
Decision Date:	25/05/2005	Manager Order:	PL.05/183		
Decision Type:	Conditional	Number of Conditions:	3		
Grant Date:	06/07/2005	Grant Managers Order #:			
Section 47 Apply?:		Part 5 Apply?:			
Expiry Date:	05/07/2010				
Decision Description:	to make alterations to an approved retail park on a site. The alterations comprise of the replacement of 4 no. approved units no.s 11-14 inclusive, comprising of a total gross floorspace of 2355 square metres, to create 1 no. retail unit comprising of a total gross floorspace of 2470 square metres which includes a mezzanine floor to be used for storage purposes only comprising of a total gross floorspace of 620 square metres and 1 no. retail unit comprising of a total gross floorspace of 2950 square metres which includes a mezzanine floor to be used for sales floorspace, comprising of a total gross floorspace of 1475 square metres.				

[Further Information](#)
[Site Location](#)
[Commencements](#)
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Figure 1: Screenshot of 2005 permission for Unit 12 (Limerick City and County website)

Comment

We agree that the works come within the scope of Section 4(1)(h). Unit No. 12 is neither a Protected Structure nor within the curtilage of a Protected Structure. Further, it is not located within an SAC or SPA and given that the development will primarily consist of internal works and minor external works of a limited duration within an established retail centre it is considered that it will not have any significant impacts on any Natura 2000 sites and we submit that Appropriate Assessment is not required. Further, no environment impact assessment is required for the proposed development.

Subdivision of Unit

The Planner's Report states that: *"I am however of the opinion that whilst the actual construction works could be considered exempt development, the impacts of the physical subdivision of one retail area into two or three smaller retail areas would give rise to increased commercial activity and would be an intensification of use. The subdivision of the existing retail unit into 2 or 3 separate retail units will have a potential impact on parking and traffic movements in the existing retail park, which is at or near capacity in terms of traffic movements from the Childers Road."*

The Planner's Report concluded that *"... I consider that the subdivision of one retail unit into either 2 or three new retail unit would have consequences in terms of increased traffic movements and increased commercial activity and would therefore be an intensification of use of the land."*

Comment

Irish Life Assurance plc disagrees with the Planner's conclusions on intensification of use.

Irish Life Assurance plc stated in its application for a Declaration that the development would not result in a material intensification of the use and would not generate any additional traffic movements that might trigger a material change of use. The attached expert reports (by Transport Insights, and Bannons) confirm that the development will not give rise to increased traffic generation or to increased commercial activity and accordingly, an intensification of use does not arise.

The Transport Insights Report, which is based on survey data undertaken prior to the Covid pandemic in early 2020 - when traffic movements were higher than they are at present - concludes as follows:

*"for the reasons set out in this TS, it has been demonstrated that the proposed subdivision of Unit No. 12 into 3 no. unique units (or fewer units) would not give rise to increased traffic generation or parking demand. As such, neither factor represents potential grounds for the proposed subdivision of the unit not representing an exempted development under Section 4(1)(h) of the Planning and Development Act, 2000 (as amended)."*

Bannon Property Consultants and Chartered Valuation Surveyors Report separately confirms that:

*"The subdivision of the subject unit into two units or three units will not give rise to increased commercial activity and would not be an intensification of use due to the overall reduction in retail space to which customers will have access.... In the event of subdivision, each store will have to make independent provision for the above [customer payment zone/staff facilities area/stock room/fitting rooms/waste management area – please see Bannon's Report at Appendix 2] areas leading to a reduction in the total floorspace available for retail sales. This is in addition to the need to create internal dividing walls between the occupiers will lead to a reduction in overall space to which customers will have access and consequently a reduction [in] the intensity of retail use."*

We also note that the Board has previously concluded that the subdivision of retail and/or office units was exempted development in several Section 5 referrals including in ABP Refs. RL2308; RL3420; RL3582.

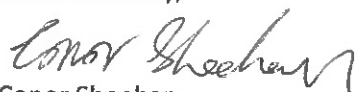
No evidence has been presented to support the Councils contention that the development will result in a material intensification of use. There is however objective evidence that the development will not result in a material intensification of use. We therefore urge the Board to agree with Irish Life Assurance plc's position that the development (both scenarios) is exempted development.

**3.0 CONCLUSION**

For the reasons already outlined above we respectfully consider that the proposed development (both scenarios) is exempted development. We respectfully invite the Board to agree with our assessment.

Please do not hesitate to contact us if you require any further information.

Yours faithfully,



Conor Sheehan  
Sheehan Planning  
Encl.



**APPENDIX 1: COPY OF DECLARATION AND PLANNERS REPORT REF EC56/20**







Comhairle Cathrach  
& Contae **Luimnigh**

**Limerick City**  
& County Council

Seirbhísi Pleanála agus Cornhshaoil,  
Comhairle Cathrach agus Contae Luimnigh,  
Tuar an Daill,  
Luimneach

Planning and Environmental Services,  
Limerick City and County Council,  
Dooradoyle,  
Limerick

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**PLANNING & DEVELOPMENT ACTS 2000 (as amended)**

**PLANNING & DEVELOPMENT REGULATIONS, 2001 (as amended)**

**SECTION 5 – DECLARATION ON DEVELOPMENT AND EXEMPTED DEVELOPMENT**

<b>DECLARATION NO.</b>	<b>EC56/20</b>
<b>Name and Address of Applicant:</b>	Irish Life Assurance PLC, Irish Life Centre, Lower Abbey Street, Dublin 1.
<b>Agent:</b>	Sheehan Planning, 44 Balnagowan, Palmerstown Park, Dartry, Dublin 6 D06 DC98

Whether the (a) the subdivision of unit no. 12 into three units and development of new doors (b) the subdivision of unit 12 into two units at Unit 12 Limerick One, Childers Road, Limerick is or is not Development or is or is not Exempted Development. The works as described on the plans submitted with the application on the 27<sup>th</sup> October 2020.

**AND WHEREAS** the Planning Authority has concluded that the (a) the subdivision of unit no. 12 into three units and development of new doors (b) the subdivision of unit 12 into two units at Unit 12 Limerick One, Childers Road, Limerick does not come within the scope of exempted development.

**NOW THEREFORE** the Planning Authority in exercise of the powers conferred on it by Section 5(2) (a) of the Planning and Development Act 2000 (as amended) hereby decides that the said development as described above is **Development and is NOT Exempt Development.**

Signed on behalf of the said Council \_\_\_\_\_ *V. Kerin*

Date: 3/12/2020

**NOTE:** A Declaration on Development or Exemption issued by Limerick City & County Council may be referred to An Bord Pleanála on payment of €220 for review within 4 weeks after the issuing of the declaration.



**Report on application under Section 5 of the Planning and Development Act 2000 (as amended)**

**Reference no.**

EC56/20

**Name and Address of Applicant:**

Irish Life Assurance PLC, Irish Life Centre, Lower Abbey Street, Dublin 1.

**Agent:**

Sheehan Planning, 44 Balnagowan, Palmerstown Park, Dartry, Dublin 6 D06 DC98

**WHEREAS** a question has arisen as to whether the (a) the subdivision of unit no. 12 into three units and development of new doors or (b) the subdivision of unit 12 into two units at Unit 12 Limerick One, Childers Road, Limerick is or is not development and is or is not exempted development.

Unit no. 12 the subject matter of this application is located at the North Eastern corner of the existing shopping park.

It comprises of c16,1275 square feet retail unit with two entrances from the car park.

Unit no. 12 was occupied by Wallis, Burtons, Evans and Dorothy Perkins.

**Parent Permission 03/770171**

Permission granted in 2003 for a retail park development comprising a convenience and comparison goods store (gross floor area 8,302 sqm), 6 no. retail warehouse units and 1 no. ancillary garden centre with a combined gross floor area of 10, 423 sqm , 2 no. comparison goods outlets (gross floor area of 3,716 sqm 1 no. leisure and fitness centre incorporating leisure and ancillary uses at ground floor (2,090sqm) and retail sports goods at first floor (2,090sqm), 2 no. restaurants (not 'drive thru') 1 no. petrol filling station and associated forecourt shop vehicular access from Childer's Road, 1090 no. car parking spaces, landscaping and all associated development and site works on a site of 7.69ha.

**Planning Permission 04/572**

To make alterations to an approved retail park on a site. The alterations comprise of the replacement of 4 no. approved units no.s 11-14 inclusive, comprising of a total gross floor space of 2355 square metres, to create 1 no. retail unit comprising of a total gross floor space of 2470 square metres which includes a mezzanine floor to be used for storage purposes only comprising of a total gross floor space of 620 square metres and 1 no. retail unit comprising of a total gross floor space of 2950 square metres which includes a mezzanine floor to be used for sales floor space, comprising of a total gross floor space of 1475 square metres.

Planning Permission reference 04/572 was granted in respect of Unit no. 12.

**Limerick City Development Plan 2010-2016 (as extended).**

The subject site is located in an area zoned ZO.5(A)- "General mixed use" with the associated land use objective to promote the development of mixed uses that services 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 employments and related uses.

**POLICY R3.**

It is the policy of Limerick City Council to ensure that Limerick City Centre remains as the primary retail location within the Mid-West Region. In this regard, the City Council will require all out of City Centre large retail proposals to demonstrate that they will not impact negatively on the vitality and viability of the City Centre by means of a sequential test.

#### **POLICY R4.**

It is the policy of Limerick City Council to facilitate a major retail development within the City Centre. In order to allow the city centre to recapture trade which it has lost to other retail schemes across metropolitan Limerick and to reconfirm its position as the dominant retail location in the region.

#### **POLICY R5.**

It is the policy of Limerick City Council to work in co-operation with the adjacent local authorities to ensure a balanced pattern of retail in accordance with National policy.

#### **Retail Planning Guidelines, 2012.**

The need for any additional retail warehousing should be carefully assessed in view of the significant levels of recent provision and potential impacts on vitality and viability of city and town centres.

The purpose of this application is to establish if the following two scenarios are exempt development.

#### **Scenario/proposal 1:**

Subdivision of Unit No. 12 into three retail units of c5,000 sq ft each (Unit 12A c4,650 sq ft, Unit 12B c4,585 sq ft and Unit 12C c 6,889 sq ft). This would be achieved by constructing internal walls within Unit 12 and would also require the development of new doors at the southern and northern elevations. The new doors would mirror the form, character, and use of the same materials as the existing doors.

#### **Scenario/proposal 2:**

Sub-division of Unit no. 12 into a c 7,000 sq ft retail unit (6,964 sq ft) and a 9,000 sq ft retail unit (9,224 sq ft)<sup>3</sup>

The new units (Unit 12a and 12b) would be subdivided by an internal block wall and would be accessed via the existing entrances. No new external doors would be required.

#### **Assessment:**

The question of whether the subdivision of an existing retail unit is development or not needs to be addressed in the first instance and thereafter, whether or not this development would constitute exempt development under the Planning and Development Act 2000 (as amended).

#### **IS IT DEVELOPMENT?**

The proposed alterations include the following

- (a) The provision of internal walls and the subdivision of retail unit 12 into three retail units. Unit 12A c4650 sq ft, Unit 12B c, 4585 sq ft, Unit 12C c, 6,889 sq ft.
- (b) The provisions of internal walls and the subdivision of retail unit into two retail units. Unit 12 A 6964 sq ft and unit 12B c9224 sq ft.
- (c) In the case of scenario (a) above the installation of new doors at the southern and northern elevations would be required. The new doors would mirror the form, character, and use the same materials as the existing doors. No new doors would be required for scenario (b) above.

**Section 3(1)** of the Planning and Development Act 2000, defines 'development' as meaning, except where the context otherwise required, 'the carrying out of any works on, in, over or under land or the meaning of any material change in the use of any structure or other land'

'Works' are defined under Section 2 of the Act as including 'any act or operation of construction, excavation, demolition, extension, alteration, repair or renewal..'

'Therefore it is considered having regard to the above definitions that the proposal would involve alterations to both the interior and the exterior of the structure and hence would involve 'works' and 'development' within the meaning of the Act.

#### **Is it exempt under Planning and Development Act, 2000?**

The developer submits that the proposed development is exempt development under Section 4(1)(h) of the Planning and Development Act 2000. This states that 'development consisting of the carrying out of works for the maintenance, improvement or other alteration of any structure, being works which affect only the interior of the structure or which do not materially affect the external appearance of the structure so as to render the appearance with the character of the structure or of neighbouring structures' shall be exempted development.

### **Construction works.**

I am of the view that the development can be considered to be exempt under Section 4(1)(h) as the proposed alterations involve interior alterations for the most part and the possible provision of two doors. I consider that these external works to be consistent with the existing fenestrations and design and in my view does not materially affect the external appearance of the structure so as to render the appearance inconsistent with the character of the character of the structure or neighbouring structure.

### **SUBDIVISION OF UNIT.**

I am however of the opinion that whilst the actual construction works could be considered to be exempt development, the impacts of the physical subdivision of one retail area into two or three smaller retail areas would give rise to increased commercial activity and would be an intensification of use.

The subdivision of the existing retail unit into 2 or 3 separate retails units will have a potential impact on parking and traffic movements in the existing retail park, which is at or near capacity in terms of traffic movements from the Childers Road.

### **Conclusion:**

It is considered that the works necessary to subdivide the existing retail unit to create either 2 or 3 new retail units including the provision of two external doors comes within the scope of Section 4(1)(h) of the Planning and Development Act 2000 being works which affect only the interior of the structure or which do not materially affect the external appearance fo the structure so as to render the appearance with the character of the structure or of neighbouring structures. However, I consider that the subdivision of one retail unit into either 2 or three new retail units would have consequences in terms of increased traffic movements and increased commercial activity and would therefore be an intensification of use of the land.

I have considered this question and I have had regard particularly to –

- (a) Section 2, 3 and 4 of the Planning and Development Act 2000 (as amended)
- (b) Plans and particulars submitted with the application of 27<sup>th</sup> October 2020.
- (c) The Planning permission related to the subject site 03/770181 and 04/770572
- (d) The particular circumstances prevailing in this site, in terms of layout and location.

### **RECOMMENDATIONS:**

I therefore consider the proposed subdivision of the existing retail Unit 12 to create either two or three new retails units to be development and **NOT** exempt development.

Signed:

  
Michael O' Brien  
Development Inspector.



**APPENDIX 2: REPORTS BY BANNON PROPERTY CONSULTANTS AND CHARTERED VALUATION SURVEYORS AND TRANSPORT INSIGHTS TRANSPORT PLANNING CONSULTANTS**





REF: 32298/COR/NJB

6<sup>th</sup> January 2020

An Bord Pleanála  
64 Marlborough Street  
Rotunda  
Dublin 1



Property Consultants and  
Chartered Valuation Surveyors

Hambleden House,  
19/26 Pembroke Street Lower, Dublin 2.  
T: +353 1 6477900 W: www.bannon.ie

**RE:** Unit 12, Limerick One Shopping Park, Section 5 Appeal  
**Declaration No.** EC56/20  
**Applicant:** Irish Life Assurance PLC, Irish Life Centre, Lower Abbey Street, Dublin 1  
**Agent:** Sheehan Planning, 44 Balnagowan, Palmerstown park, Dartry, Dublin 6

To whom it may concern,

Bannon have been instructed by the applicant and agent, to outline the why the subdivision of Unit 12 within Limerick One Shopping Park will not give rise to increased commercial activity and an intensification of use.

The subdivision of the subject unit into two units or three units will not give rise to increased commercial activity and would not be an intensification of use due to the overall reduction in retail space to which customers will have access.

The store in its current configuration contains one of the following areas:

- Customer Payment Zone
- Staff Facilities Area
- Stock Room
- Fitting Rooms
- Waste Management Area

In the event of subdivision, each store will have to make independent provision for the above areas leading to a reduction in the total floorspace available for retail sales. This in addition to the need to create internal dividing walls between the occupiers will lead to a reduction in overall space to which customers will have access and consequently a reduction the intensity of retail use.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'Neil Bannon', written over a light blue circular watermark.

Neil Bannon  
Executive Chairman  
For BANNON  
nbannon@bannon.ie

DIRECTORS: NEIL BANNON (Chairman), NIALl BREARON, DESMOND BYRNE, DAVID CARROLL, PAUL DOYLE (Managing), RAY GERAGHTY, RICHARD MULDOWNEY, RODERICK NOWLAN, DARRÉN PEAVOY, JAMES QUINLAN.  
DIVISIONAL DIRECTORS: LUCY CONNOLLY, JENNIFER MULHOLLAND MAHON, ALEXANDRA PATTERSON, WILLIAM LAMBE, ADAM MERRIMAN.  
ASSOCIATE DIRECTORS: LOUISE CREEVY, BEN SEMPLE.





# Proposed Subdivision of Unit No. 12, Limerick One Shopping Park – Transport Statement

<b>Contract Number</b>	C512_4 22020
<b>Topic</b>	Transport Statement (TS) for Proposed Subdivision of Unit No. 12, Limerick One Shopping Park, Childers Road, Limerick [Declaration No.: EC56/ 20]
<b>Version Number</b>	v1.4
<b>Status</b>	Final
<b>Author(s)</b>	Ciaran McKeon
<b>Reviewer</b>	Jurek, Gozdek
<b>Date</b>	07 January 2021

## 1. Introduction

### 1.1. Overview

Transport Insights has been commissioned by Irish Life Assurance PLC to prepare a Transport Statement (TS) in relation to the proposed subdivision of Unit No. 12, Limerick One Shopping Park into 3 no. smaller units (or fewer units). This TS seeks to respond to Limerick City and County Council's decision that the proposed subdivision would not represent an exempted development under Section 4 (1)(h) of the Planning and Development Act, 2000 (as amended) [Declaration No.: EC56/ 20], and supports a first-party appeal to An Bord Pleanála in relation to said decision.

This TS focuses on the proposed subdivision of Unit No. 12 into 3 no. (as set out in Scenario 1 within the Section 5 Reference) or fewer units.

### 1.2. Background

#### Exempted Development Declaration Request

Sheehan Planning, acting on behalf of Irish Life Assurance PLC, submitted a request for a declaration from Limerick City and County Council on 27 October 2020 that the proposed subdivision of Unit No. 12, Limerick One Shopping Park represented exempted development as per Section 4 (1)(h) of the Planning and Development Act, 2000 (as amended).

The proposed development, as set out within the declaration request cover letter, site location plan/ map, floor plans/ elevations etc. comprised two scenarios, as follows:

- Scenario 1, with Unit No. 12 subdivided into 3 no. retail units via the construction of new internal walls and installation of new doors at northern and southern elevations; and
- Scenario 2, with Unit No. 12 subdivided into 2 no. retail units via the construction of new internal walls.

The overall floor area (currently ca. 1,512 sqm), would remain broadly static under each scenario (Scenario 1: ca. 1,498 sqm, and Scenario 2: ca. 1,506 sqm).

### **Limerick City and County Council Decision**

Following consideration of the submitted information as set out above, Limerick City and County Council notified its decision on 03 December 2020 that the proposed development “*is NOT Exempt Development*”. Limerick City and County Council’s decision was supported by a Report from a Development Inspector which determined that the construction works themselves, including new internal walls (both scenarios) and new doors (Scenario 1) “*can be considered exempt under Section 4(1)(h)*”.

Notwithstanding the above, the Development Inspector expressed an opinion that “*the subdivision of the existing retail unit into 2 or 3 separate retail units will have a potential impact on parking and traffic movements within the existing retail park, which is at or near capacity in terms of traffic movements from the Childers Road.*” Its Report concluded that “*the subdivision of one retail unit into either 2 or three new retail units would have consequences in terms of increased traffic movements and increased commercial activity and would therefore be an intensification of use of the land.*”

### **1.3. National Best Practice – Traffic and Transport Assessment Guidelines**

Transport Infrastructure Ireland’s (TII’s) *Traffic and Transport Assessment (TTA) Guidelines* (May 2014) provides guidelines in relation to the requirement for and best practice in relation to the completion of a Transport Assessment.

Section 2.1 of the *TTA Guidelines* sets out thresholds for the production of a Traffic and Transport Assessment, with thresholds directly related to the floor area (in sqm) of new development. Such thresholds reflect the direct relationship between the intensity of trip making and parking demand, and the scale of development. In the case of retail, both Tables 2.1 and Tables 2.2 (more onerous thresholds relating to developments where national roads are affected), has determined such a requirement for new/ expanded developments exceeding 1,000 sqm gross floor area

(GFA). Notwithstanding Unit No. 12 currently exceeding 1,000 sqm GFA, its proposed subdivision will not result in an increase in floor area, and therefore trip making and parking demand. As such, in accordance with national best practice, and reflecting its negligible (at most) impacts, it does not necessitate completion of a Traffic and Transport Assessment.

## 1.4. Note Structure

The remainder of this TS is structured as follows:

- Section 2 – development site overview;
- Section 3 – proposed development’s traffic characteristics; and
- Section 4 – summary and conclusion.

## 2. Development Site Overview

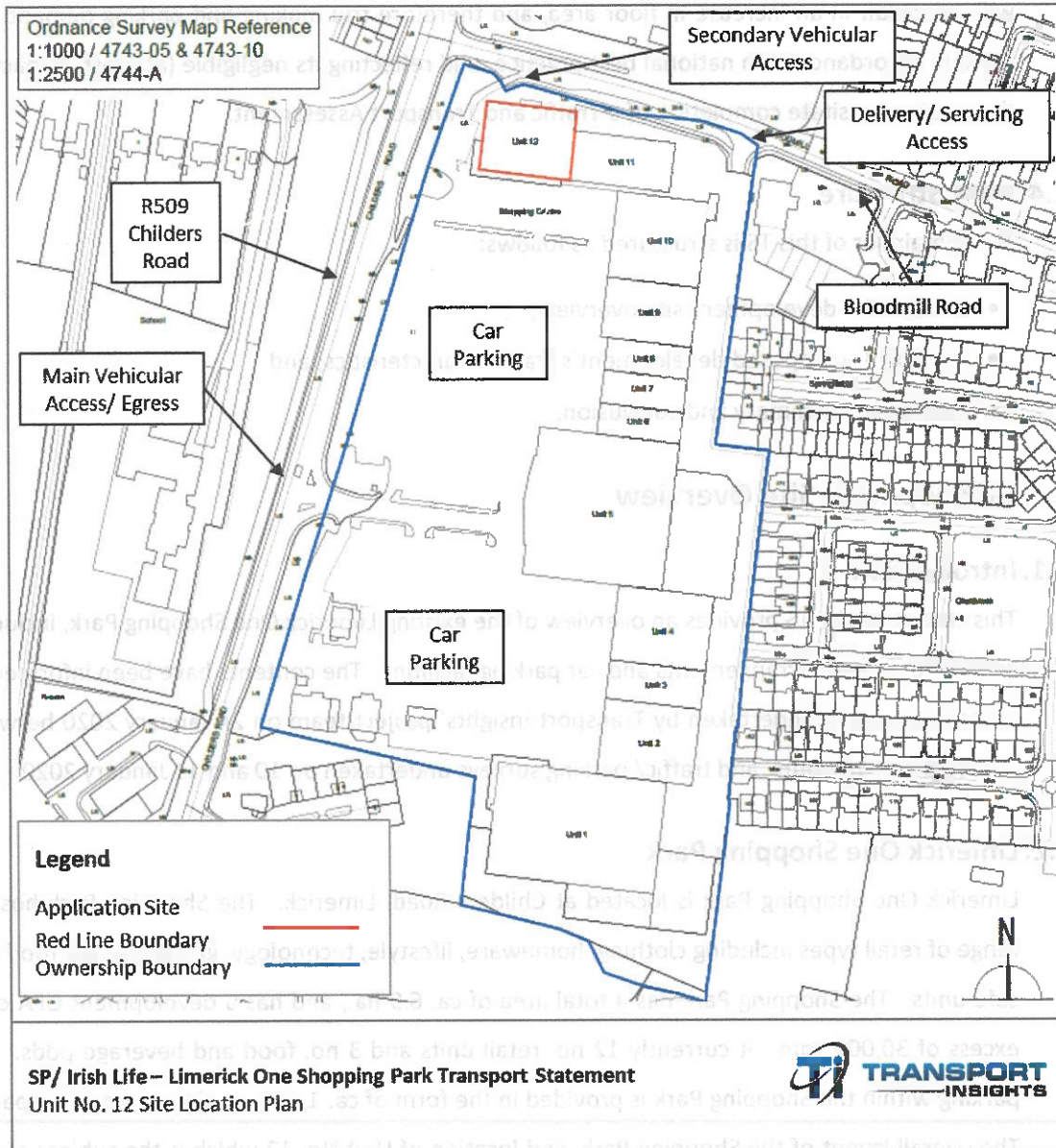
### 2.1. Introduction

This section of the TS provides an overview of the existing Limerick One Shopping Park, including retail offer, access arrangements and car parking facilities. The contents have been informed by a site assessment undertaken by Transport Insights’ project team on 24 January 2020 between 11:00hrs and 18:00hrs, and traffic/ parking surveys undertaken on 10 and 11 January 2020.

### 2.2. Limerick One Shopping Park

Limerick One Shopping Park is located at Childers Road, Limerick. The Shopping Park hosts a range of retail types including clothing, homeware, lifestyle, technology, groceries, fast food and café units. The Shopping Park has a total area of ca. 6.9 ha., and has a development GFA of in excess of 30,000 sqm. It currently 12 no. retail units and 3 no. food and beverage pods. Car parking within the Shopping Park is provided in the form of ca. 1,173 on-site car parking spaces. The overall layout of the Shopping Park, and location of Unit No. 12 which is the subject of this appeal is illustrated in Figure 2.1 (overleaf).

**Figure 2.1 Limerick One Shopping Park Site Location/ Layout Plan**



As can be seen from the preceding Figure 2.1, vehicular access/ egress to the Shopping Park is via R509 (Childers Road), which adjoins its western boundary. This junction, photographed in Figure 2.2 (overleaf), is signal-controlled, and accommodates access and egress to and from both the north and south along Childers Road. Vehicles can also access Shopping Park via a left-in access-only junction on Bloodmill Road, which adjoins its northern boundary. Servicing/ delivery to the rear of the Shopping Park is also accessed from Bloodmill Road.

Figure 2.2 Main Vehicular Access/ Egress From Childers Road



### 2.3. Limerick One Shopping Park Unit No. 12

As set out in Section 1.2 and illustrated in Figure 2.1, Unit No. 12 currently has an overall floor area of ca. 1,512 sqm, and is located in the northwest corner of the Shopping Park. The unit is occupied by Arcadia Group Multiples (Ireland) Limited, and as illustrated in Figure 2.3 (overleaf), 4 no. unique brands are sold within it, namely:

- Wallis;
- Burton;
- Evans; and
- Dorothy Perkins.

Figure 2.3 Unit No. 12 Southern Elevation\*



\* Image courtesy of Sheehan Planning.

#### 2.4. Limerick One Shopping Park – Car Parking Occupancy Characteristics

48-hour classified junction turning count surveys of the main access/ egress to the Shopping Park from Childers Road and secondary access-only from Bloodmill Road on Friday 10 and Saturday 11 January 2020 inclusive were completed. The surveys coincided with full occupancy of the retail park, and predated the impacts of Covid-19 on retail activities and related traffic and parking demand.

An occupancy count within the Shopping Park's car parks was completed in advance of the traffic surveys commencing on Friday 10 January 2020. This data, in conjunction with accessing and egressing traffic data to and from the site, has been used to develop a car parking accumulation profile for the Shopping Park.

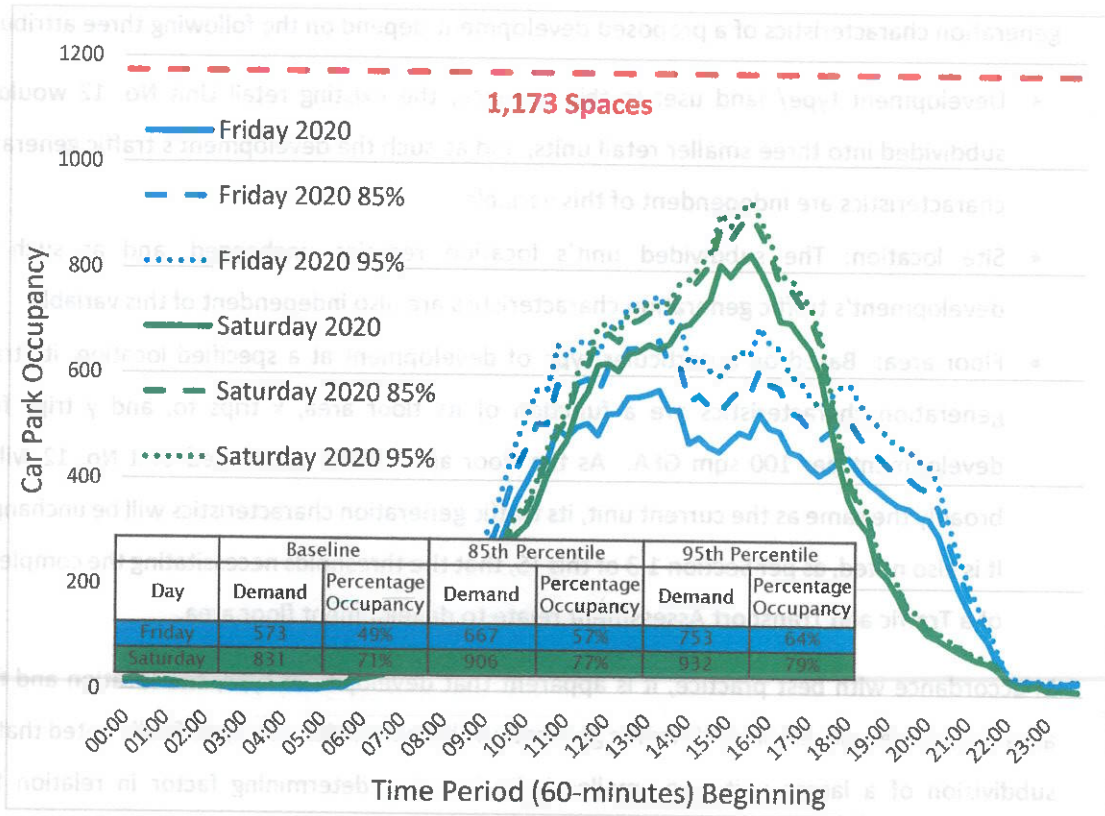
85<sup>th</sup> and 95<sup>th</sup> percentile car parking accumulations have also been produced based on the footfall data provided to Transport Insights – such scenarios were developed to reflect seasonal variations in retail activity, with such activity typically lower in January. The full results of this analysis are presented in Figure 2.4 (overleaf).

Although not deemed to be of relevance to the current proposed subdivision of Unit No. 12 for the reasons set out in the subsequent Section 3 of this TS, it indicates that there is sufficient reserve capacity throughout the year to accommodate a level of further development within the Shopping Park. It also directly addresses and contradicts Limerick City and County Council's



determination that “the subdivision of the existing retail unit into 2 or 3 separate retail units will have a potential impact on parking and traffic movements within the existing retail park, which is at or near capacity in terms of traffic movements from the Childers Road.”

**Figure 2.4 Limerick One Shopping Park: Car Parking Accumulation Profile**



### 3. Proposed Development’s Traffic Characteristics

#### 3.1. Introduction

This section of the TS provides an overview of the proposed development that is the subject of this first-party appeal, and its traffic generation and parking demand characteristics by comparison to the existing unit as described in the preceding Section 2.

#### 3.2. Proposed Development Overview

The proposed development that is the subject of the appeal supported by this TS relates to the subdivision of the existing Unit No. 12 (ca. 1,512 sqm) into 3 no. smaller retail units of ca. 432, 426 and 640 sqm (or fewer units). The overall floor area would remain broadly static, at ca. 1,498 sqm.

The subdivision of Unit No. 12 would be achieved by constructing internal walls within the existing unit, and the installation of new doors at the southern and northern elevations.

### 3.3. Traffic and Parking Demand Characteristics

#### Traffic Impact

The industry standard Trip Rate Information Computer System (TRICS) has been referred to as the basis for determining the potential traffic impact of the proposed development. Traffic generation characteristics of a proposed development depend on the following three attributes:

- **Development type/ land use:** In this instance, the existing retail Unit No. 12 would be subdivided into three smaller retail units, and as such the development's traffic generation characteristics are independent of this variable.
- **Site location:** The subdivided unit's location remains unchanged, and as such the development's traffic generation characteristics are also independent of this variable.
- **Floor area:** Based on a particular type of development at a specified location, its traffic generation characteristics are a function of its floor area, x trips to, and y trips from development per 100 sqm GFA. As the floor area of the subdivided Unit No. 12 will be broadly the same as the current unit, its traffic generation characteristics will be unchanged. It is also noted, as per Section 1.3 of this TS, that the thresholds necessitating the completion of a Traffic and Transport Assessment relate to development floor area.

In accordance with best practice, it is apparent that development type, site location and floor area determine a development's traffic generation characteristics. It is specifically noted that the subdivision of a larger unit into smaller units is not a determining factor in relation to a development's traffic generation potential. It is further noted that, as per Section 2.3 of this TS, the existing unit is occupied by Arcadia Group Multiples (Ireland) Limited, selling 4 no. unique brands within it, namely Wallis, Burton, Evans and Dorothy Perkins. As such, the retail offer within the subdivided unit is likely to be comparable to that on offer at present in the larger unit. For the above reasons, it is not envisaged that the subdivision of Unit No. 12 into 3 no. smaller units (or fewer units) will give rise to any traffic impact on the surrounding road network.

#### Parking Impact

As per the traffic impact heading above, a development's parking demand characteristics are a function of its type, location and floor area. This is supported by the *Limerick City Development Plan 2010-2016 (as extended)*, with the following variables (Table 16.1: General Parking Standards) determining a development's parking requirements:

- **Land use:** Standards are provided for 3 no. types of retail land uses, namely food superstore, non-food retail and retail warehouse.

- Location: Standards are provided for three zones – zone 1 (central core), zone 2 (outer core) and zone 3 (suburban).
- Floor area: For a specific land use classification and development location, parking standards are determined based on the development's floor area.

In accordance with best practice and the *Limerick City Development Plan 2010-2016 (as extended)*, it is apparent that development type, site location and floor area determine a development's parking demand characteristics, and that **the subdivision of a larger unit into smaller units is not a determining factor in relation to a development's parking requirements.**

## 4. Summary and Conclusion

### 4.1. Summary

Transport Insights has been commissioned by Irish Life Assurance PLC to prepare a Transport Statement (TS) in relation to the proposed subdivision of Unit No. 12, Limerick One Shopping Park into 3 no. smaller units (or fewer units). This TS responds to Limerick City and County Council's decision that the proposed subdivision would not represent an exempted development under Section 4 (1)(h) of the Planning and Development Act, 2000 (as amended) [Declaration No.: EC56/20], and supports a first-party appeal to An Bord Pleanála in relation to said decision. This TS focuses on the proposed subdivision of Unit No. 12 into 3 no. (as set out in Scenario 1 within the Section 5 Reference) or fewer units.

Limerick City and County Council's decision dated 03 December 2020 that the proposed development "*is NOT Exempt Development*" was supported by a Report from a Development Inspector which expressed an opinion that "*the subdivision of the existing retail unit into 2 or 3 separate retail units will have a potential impact on parking and traffic movements within the existing retail park, which is at or near capacity in terms of traffic movements from the Childers Road.*" Its Report concluded that "*the subdivision of one retail unit into either 2 or three new retail units would have consequences in terms of increased traffic movements and increased commercial activity and would therefore be an intensification of use of the land.*"

Based on evidence within this TS, it has been demonstrated that a development's traffic generation characteristics and parking requirements are a function of the land use (= type of development), site location and scale (sqm of floor area), and that **it is independent of the potential subdivision of a unit.**

It has been further demonstrated, via survey data collection and related analysis that the car park has capacity to accommodate additional demand; and that the retail offer within the subdivided

Unit No. 12 would be comparable to that offered at present within which 4 no. unique brands are sold.

## 4.2. Conclusion

For the reasons set out in this TS, it has been demonstrated that the proposed subdivision of Unit No. 12 into 3 no. unique units (or fewer units) would not give rise to increased traffic generation or parking demand. As such, neither factor represents potential grounds for the proposed subdivision of the unit not representing an exempted development under Section 4 (1)(h) of the Planning and Development Act, 2000 (as amended).

**APPENDIX 3: COPY OF COVER LETTER AND REDUCED SIZE DRAWINGS SUBMITTED TO THE PLANNING AUTHORITY**



Senior Executive Officer  
Limerick City and County Council  
Planning and Environmental Services  
City and County Council Offices  
Dooradoyle Road  
Limerick

27<sup>th</sup> October 2020

Dear Sir/Madam,

**Re: Section 5 Reference in respect of a proposed development at Unit 12, Limerick One, Childers Road, Limerick**

## 1.0 INTRODUCTION

### 1.1 Purpose of Application

We<sup>1</sup> act on behalf of Irish Life Assurance Plc<sup>2</sup> ('Irish Life') the freehold owners of Unit No. 12, Limerick One, Childers Road, Limerick. Unit No. 12 is a c. 16,275 sq ft retail unit (permitted as a retail unit and not a retail warehouse unit) that has two entrances (southern elevation) to the main carpark in the Limerick One Shopping Park at present. Irish Life wish to establish if the following works are exempted development (2 scenarios/proposals):

#### Scenario/Proposal 1:

Subdivision of Unit No. 12 into three retail units of c. 5,000 sq ft each (Unit 12A c. 4,650 sq ft; Unit 12B c. 4,585 sq ft; and Unit 12C c. 6,889 sq ft). This would be achieved by constructing internal walls within Unit 12 and would also require the development of new doors at the southern and northern elevations. The new doors would mirror the form, character, and use the same materials as the existing doors.

#### Scenario/Proposal 2:

Sub-division of Unit No. 12 into a c. 7,000 sq ft retail unit (6,964 sq ft) and a 9,000 sq ft retail unit (9,224 sq ft)<sup>3</sup>. The 'new' units (Unit 12a and 12b) would be subdivided by an internal block wall and would be accessed via the existing entrances. No new external doors would be required.

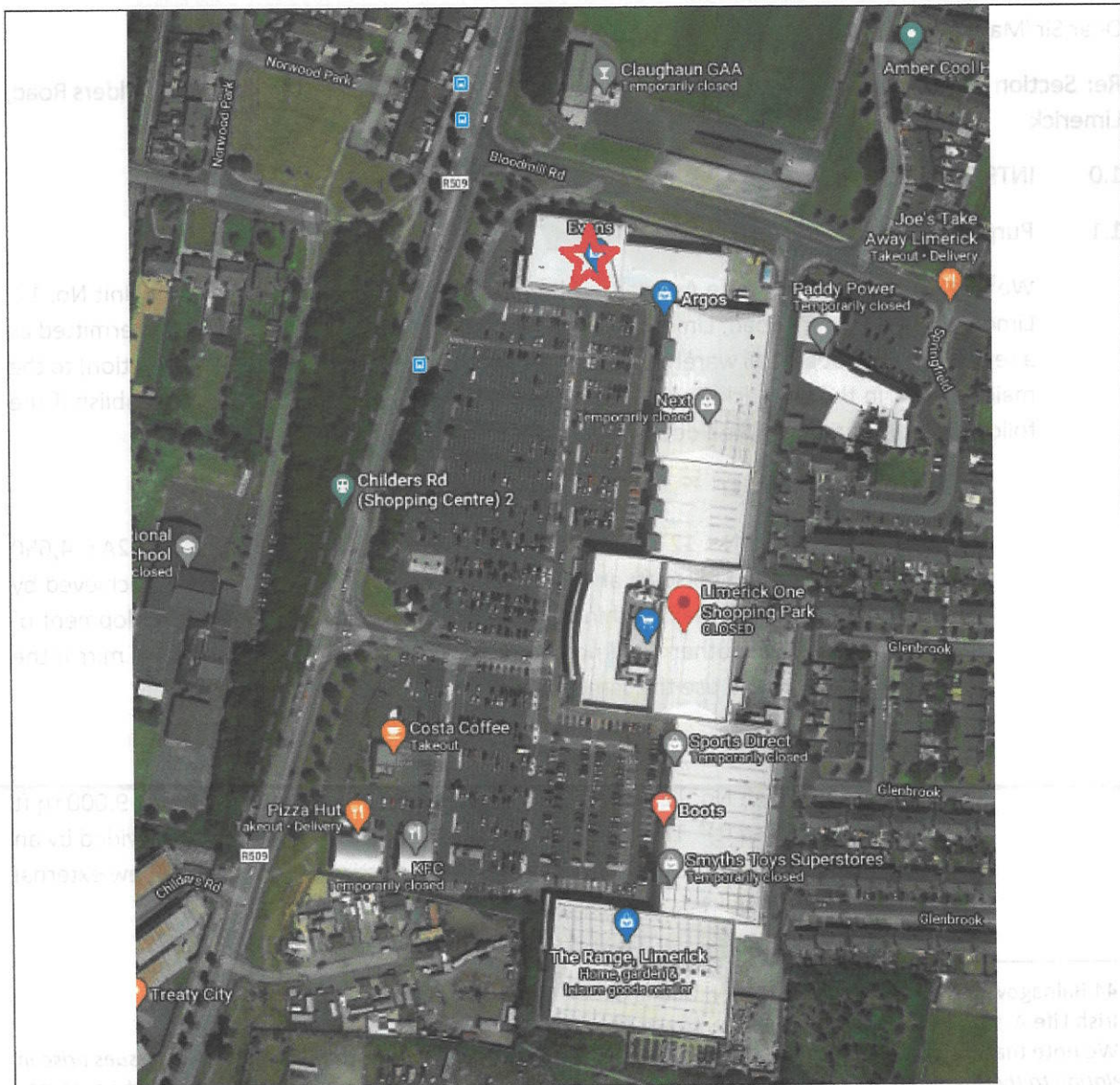
<sup>1</sup> 44 Balnagowan, Palmerston Park, Dartry, Dublin 6.

<sup>2</sup> Irish Life Assurance PLC, Irish Life Centre, Lower Abbey Street, Dublin 1.

<sup>3</sup> We note that the Retail Planning Guidelines, 2012 state that: "Specific planning and competition issues arise in relation to the size range of individual retail warehouse units and it is therefore necessary to address the separate matters of minimum and maximum unit sizes. Generally speaking, units of less than 700 M2 gross floorspace are more easily capable of being accommodated in urban centres and, in any event, tend to sell a less bulky range of goods. Consequently, planning authorities may consider it appropriate to impose a minimum size condition preventing the construction or subdivision of retail warehouse units into stores less than 700 M2 in out-of-centre locations." In this case Unit No. 12 was permitted as retail use and not as retail warehouse use (Ref 04/572) with no conditions attached to the permission limiting/restricting subdivision of the unit in Ref 04/572. Subdivision of retail warehousing units as outlined in the Retail Planning Guidelines for Planning Authorities, 2012 does not therefore arise here.

We consider that the proposed works (both scenarios) come within the scope of Section 4 (1)(h) of the Planning and Development Act, 2000. However, for completeness, Irish Life has instructed us to request a declaration from Limerick City and County Council to this effect.

A completed Section 5 Application Form together with the appropriate application fee (€80) and copies of a site location plan/map and floor plans/elevations are attached with this application.

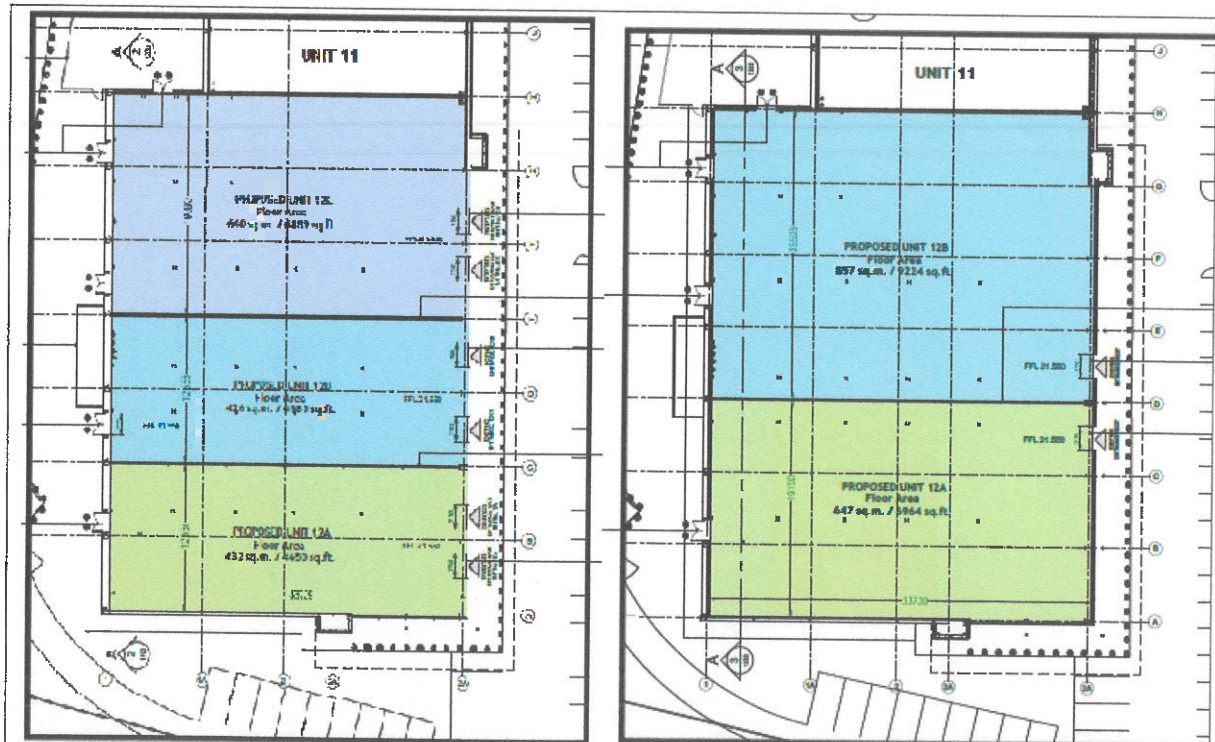


**Figure 1:** Aerial photograph of the Limerick One Shopping Park with the approximate location of Unit No. 12 denoted by the red star. Source: Googlemaps annotated by Sheehan Planning.





**Figure 2:** Photograph of the entrances to Unit No. 12 located on the southern elevation. Under the scenario/proposal 1, additional entrances/doors would be installed in the glass façade at the location shown on Drawing no. P-1202 (please see the drawing relating to scenario 1 only) and also at the rear elevation. The size of the entrances and the materials to be used would mirror those of the existing entrances. Source: SheehanPlanning



**Figure 3:** Showing the proposed split of Unit 12 in scenario/proposal 1 (left) and scenario/proposal 2 (right).

Unit No. 12 is neither a Protected Structure nor within the curtilage of a Protected Structure. Further, it is not located within an SAC or SPA and given that the development will primarily consist of internal works and minor external works of a limited duration within an established retail centre it is considered that it will not have any significant impacts on any Natura 2000 sites and we submit that Appropriate Assessment is not required. Further, no environment impact assessment is required for the proposed development.

No change of use is proposed in either scenario.

Given that the development relates to subdivision of an existing retail unit it is also considered that the development will not result in a material intensification of use of Unit No. 12 or generate any additional traffic movements that might trigger a material change of use.

Figure 2: Photograph of the exterior of the building to Unit No. 12 located in the southern part of the retail centre. The photograph shows the existing entrance to the building and the proposed entrance to the new unit. The photograph also shows the existing entrance to the building and the proposed entrance to the new unit. The photograph also shows the existing entrance to the building and the proposed entrance to the new unit.

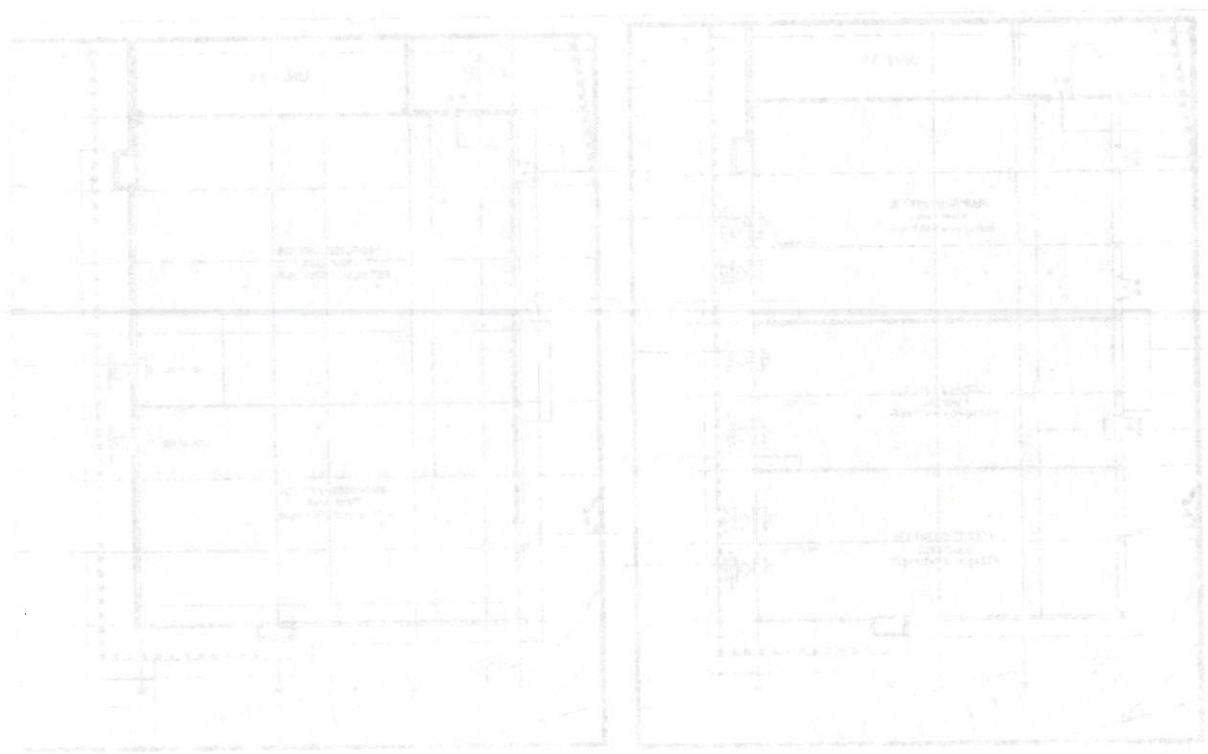


Figure 3: Proposed subdivision of Unit No. 12 into two units. The diagram shows the existing layout of the unit and the proposed subdivision into two units. The diagram shows the existing layout of the unit and the proposed subdivision into two units.

## 2.0 STATUTORY PROVISIONS

The key relevant statutory provisions relating to the proposed development are set out below.

### 2.1 Planning and Development Act

Section 2 (1) of the *Planning and Development Act, 2000 (as amended)* states that:

*“works” includes any act or operation of construction, excavation, demolition, extension, alteration, repair or renewal and, in relation to a protected structure or proposed protected structure, includes any act or operation involving the application or removal of plaster, paint, wallpaper, tiles or other material to or from the surfaces of the interior or exterior of a structure.”*

*“use”, in relation to land, does not include the use of the land by the carrying out of any works thereof”*

*“exempted development” has the meaning specified in section 4”*

Section 3(1) of the *Planning and Development Act 2000 (as amended)* provides that ‘development’ means:

*“... except where the context otherwise requires, the carrying out of any works on, in, over or under land or the making of any material change of use of any structures or other land.*

Section 4 (1)(h) of the *Planning and Development Act, 2000 (as amended)* states that:

*“The following shall be exempted developments for the purposes of this Act - ...*

*(h) development consisting of the carrying out of works for the maintenance, improvement or other alteration of any structure, being works which affect only the interior of the structure or which do not materially affect the external appearance of the structure so as to render the appearance inconsistent with the character of the structure of or neighbouring structures”*

## 2.3 DISCUSSION

### 2.3.1 Subdivision of Unit is Exempted Development under Section 4(1)(h)

In our opinion, the subdivision of Unit No. 12, which will involve the construction of an internal wall(s) within the structure (Unit No. 12), comes within the scope of Section 4 (1)(h) and is exempted development for the following reasons:

- a) The construction of an internal wall(s) is an improvement or alteration to a permitted structure and is therefore exempted development; and
- b) No change of use is proposed or material intensification of use will arise; Unit No. 12 located within a large established retail centre (the Limerick One Shopping Park) which is home to a wide range and size of retail units. In the circumstances it is considered that the subdivision would not give rise to increased traffic movements or any other activity that

would have material consequences and therefore, would not constitute a material change of use.

We also note that the Board has previously concluded that the subdivision of retail and/or office units was exempted development in several Section 5 referrals including in ABP Refs. RL2308; RL3420; RL3582.

### 2.3.2 **New entrances/doors comes within the Scope of Section 4 (1)(h)**

It is respectfully considered that the development of additional entrances as shown on the drawings for scenario/proposal 1 also come within the scope of section 4(1)(h) being alteration/improvement of the structure which are consistent with the character of the existing structure (which has multiple entrances) and will not materially affect the external appearance of the structure so as to render the appearance inconsistent with the character of the structure of neighbouring structures (which also have several entrances). In this regard we draw the Council's attention to the Supreme Court's Decision in *Cairnduff v O'Connell* (as summarised at para 37 of the more recent High Court judgment in *McCabe v CIE* [2006] IEHC 356):

*"35. In my judgment the renewal or reconstruction of a part or of parts of the bridge would be covered by the provisions of s. 4(1)(h) of the Act of 2000, provided that the extent of that renewal or reconstruction was not such as to amount to the total or substantial replacement or rebuilding of the original structure. The question is one of fact and degree whether in the instant case the original railway under-bridge has been so changed by the works that one could not reasonably conclude that it remains the same bridge even though with some alternations, improvements or indications of maintenance work*

*37...Cairnduff v. O'Connell [1986] I.R. 73, where Finlay C.J., (Walsh and Griffin J.J. concurring), held, with reference to s. 4(1)(g) of the Local Government (Planning and Development) Act, 1963, (which also employed the phrase, "which do not materially affect the external appearance of the structure so as to render such appearance inconsistent the character of the structure"), that the insertion of a window in a side wall of a three storey terrace house, the replacement of a window by a door and, the construction of a balcony and staircase for the purpose of converting it into a residence with two flats, had not so materially affected the external appearance of the structure, as to render it inconsistent with the character of the house itself or of adjoining houses. In the course of his judgment, Finlay C.J., (at page 77) held as follows:-*

*"Secondly, I am satisfied that the character of the structure provided for in the sub-section must relate, having regard to the provisions of the Act in general, to the shape, colour, design, ornamental features and lay-out of the structure concerned. I do not consider that the character of the structure within the meaning of this sub-section will depend on its particular use at any time...."*

*38. I accept as correct the argument of Ms. Butler that the mere fact that a pre-development structure and the post-development structure is used for the same purpose, as a railway under-bridge, does not mean that the character of the structure has not been materially affected. The Court was also referred to a number of other cases such as: Westport Urban District Council v. Golden [2002] 1 I.L.R.M. 439, (High*

Court); *Boroughs Day v. Bristol City Council*, (January 18th 1996, - Q.B.D.); *Dublin Corporation v. Bentham* [1993] 2 I.R. 58 (High Court); *Esat Digifone Limited v. South Dublin County Council* [2002] 3 I.R. 585, (High Court). However, these cases do not appear to me to expound any new principles with regard to the interpretation of s. 4(1)(h) of Act of 2000, or its predecessor s. 4(1)(g) of the Act of 1963, relevant to this particular issue, or to vary in any way the principles as stated by *Finlay C.J.*

39. I find that prior to the carrying out of the works by the Respondent this particular bridge presented as a simple, plain and very common type of minor railway under-bridge erected in hundreds from 1839 onwards throughout the island of Ireland. It was a narrow single span structure carrying main line double railway tracks over a minor regional road. It consisted of a brick built barrel vault springing from abutments of five courses of rusticated ashlar limestone blocks. At each end of the vault it had a semicircular voussoir arch of similarly dressed limestone blocks and spandrels of horizontally laid courses of similarly dressed limestone blocks surmounted by a plain concrete parapet. It had heavy steeply angled masonry wing walls or buttresses up to crown top level on either side of the arch. There was no evidence offered at the hearing of this application before the Court that it possessed any features of particular interest from an engineering, architectural, artistic or historical view point. I find that in every respect it conformed to the standard of architectural character stated by *Sganzin* (Boston Translation from original French, 1827) and cited by *O'Keeffe and Simington* in "Irish Stone Bridges — History and Heritage" (Irish Academic Press, 1991) pages 198 – 199 as follows:-

"Bridges should correspond with the locality — simple and plain upon roads: bold, rich and varied in cities."

40. Following the works carried out by the Respondent I find that the overall dimensions of the bridge remain the same. So also, I find, does its essential and immediate visual impact as a minor masonry railway under-bridge on a minor road leading through a railway embankment. Substantial sections of the original limestone abutments remain as do the masonry wing walls or buttresses. The limestone voussoir arches and spandrels have been replaced by a horizontal lintel of pre-cast pre-stressed grey coloured concrete supported by vertical bed stones in similar material resting upon the original limestone abutments, but entirely faced with reconstituted stone blocks. The original horizontally laid rusticated ashlar limestone and concrete block parapet has been replaced by a similarly laid parapet of reconstituted stone blocks. I find that the visible replacement stone work was designed to blend, and does effectively blend the new single span flat deck of pre-cast pre-stressed concrete with the existing stone structure. I find that the new concrete deck is not of such a thickness, colour or design as to contrast discordantly with the overall darker coloured masonry of the bridge. I find that the post-development visible surface treatment of the bridge is such, that in form, proportion, harmony with its environment, gradation, rhythm of composition, details, colour and reaction to light and shade, it retains its original character [see *Steinman and Watson*, "Bridges and their Builders" (Dover Publications Incorporated, New York 1957) page 393]"

We would also draw the Council's attention to the Board decision in ABP-303117-18 wherein the Board determined that the proposed installation of additional windows in rear façade of a house did not materially affect the external appearance of the structure so as to render the appearance inconsistent with the character of the structure or of neighbouring structures and

was development that was exempted development. By analogy we consider that the installation of additional doors, is exempted development as: 1: neighbouring structures have similar size doors; 2. Unit 12 will remain in retail use and retain its 'retail' character (which is consistent with the use of neighbouring units in the retail park); and 3. the development will not result in any change in the overall dimensions of the structure.



**Figure 4:** Photograph of the entrances to Unit No. 12 and other neighbouring units in Limerick One; the development of additional entrances at No. 12 would not be inconsistent with the character of neighbouring structures (which have similar sized doors). Source: Google.

### 3.0 CONCLUSION

For the reasons already outlined above we respectfully consider that the proposed development (both scenarios) is exempted development. We respectfully invite Limerick City and County Council to agree with our assessment.

Please do not hesitate to contact us if you require any further information.

Yours faithfully,

Conor Sheehan

Sheehan Planning

Encl.















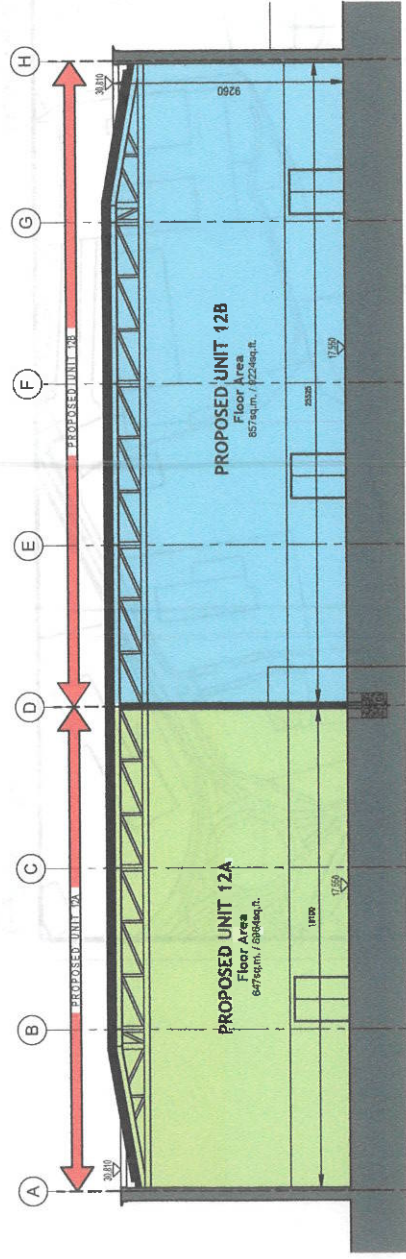










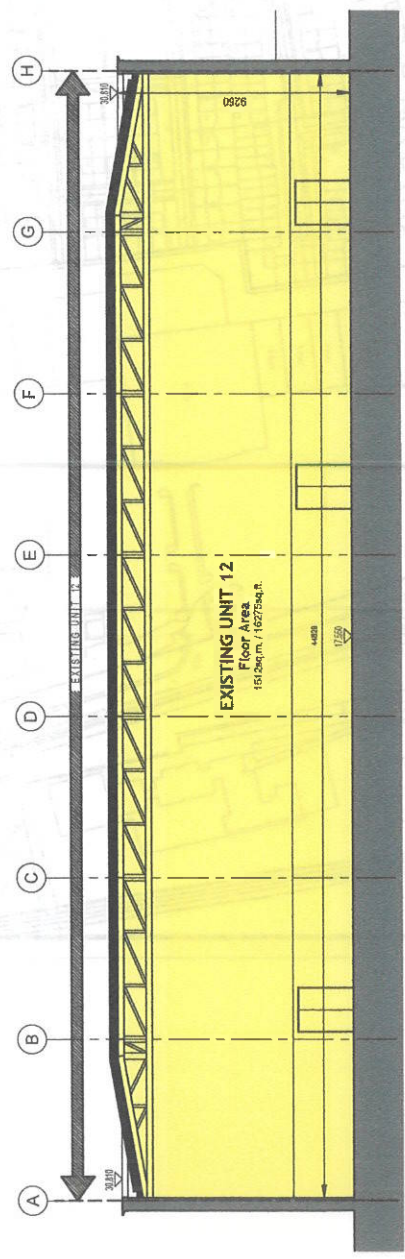


**LEGEND -**  
 Breakdown of Proposed Unit 12 Split:  
 Extent of proposed new Unit No. 12A  
 ( 687sq.m. / 694sq.ft. )  
 Extent of proposed new Unit No. 12B  
 ( 857sq.m. / 922sq.ft. )

**3 Proposed Section - AA**  
 P-4203 SCALE 1:100/A1

Proposed new separating wall to split unit:  
 R.C. pad foundations under new steel columns,  
 esp. foundations under end/balcony walls  
 spanning between new steel columns.  
 New wall to meet fire/rescue or soundly needed  
 for fire safety.  
 New wall to achieve 60 minutes fire resistance.

**Proposal No.2**



**LEGEND -**  
 Extent of Existing Unit No. 12  
 ( 1512sq.m. / 1627sq.ft. )

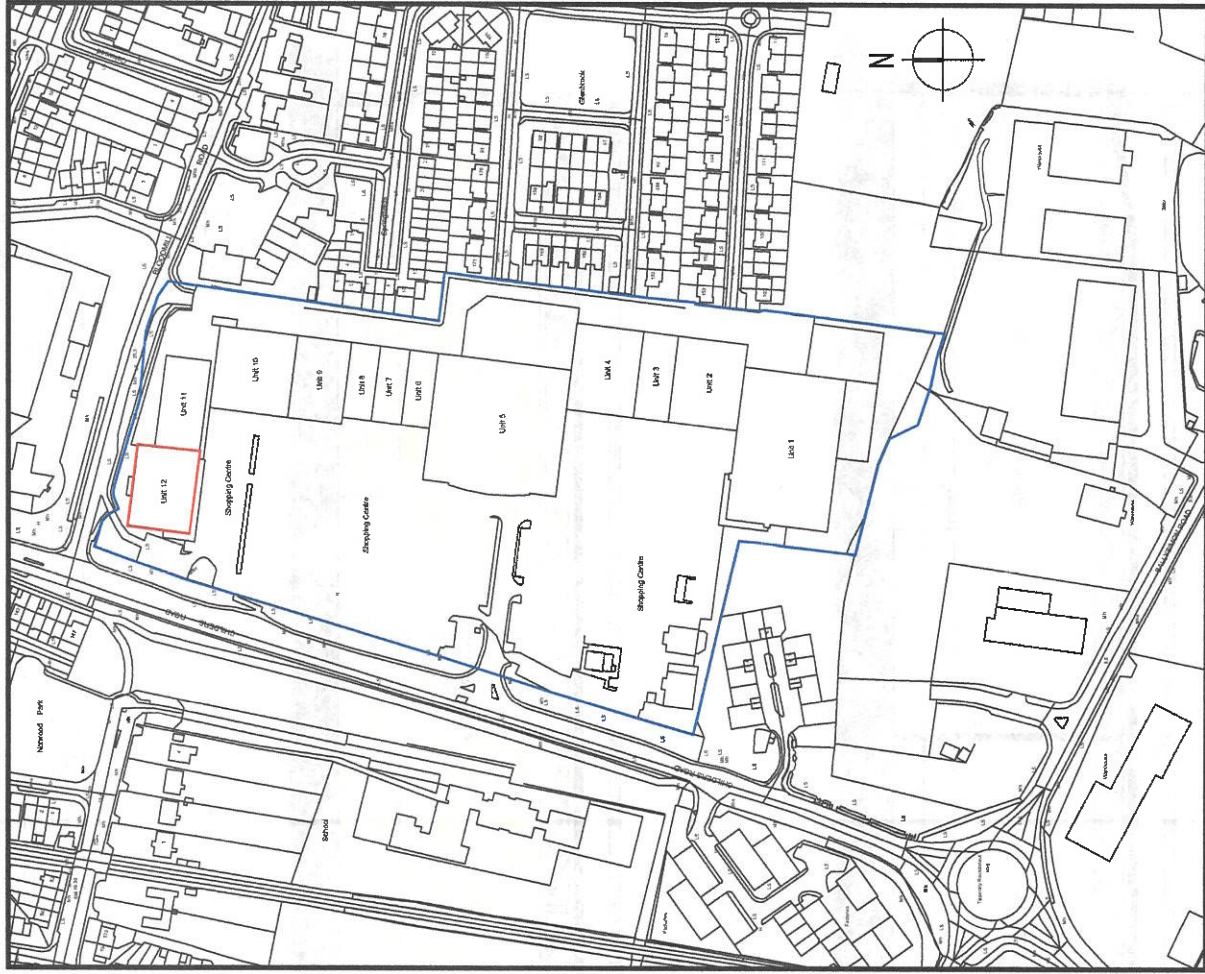
**1 Existing Section - AA**  
 P-4203 SCALE 1:100/A1

**Planning Application**

**opfermann**  
 Architecture & Planning  
 1000 Series Plan/1001 Series General Development Plan/1020-101 - New Units - Context - Planning Reg. Amendment - 08/20/19 - 1:1

UNIT	UNIT No.12 SPLIT - LAMBRICK ONE SHOPPING PARK, CHILLERS ROAD, LAMBRICK	PLANNING
SECTION	EXISTING & PROPOSED SECTION - AA	
DATE	30.06.2020	
SCALE	1:100/A1	
PROJECT NO.	130-2074-25-00000-001	

REVISION DATE	REVISION DESCRIPTION
A 02/2020	FLOOR AREA WALL



Ordinance Survey Map Reference  
 1:1000 / 4743-05 & 4743-10  
 1:2500 / 4744-A

**Planning Application**

**Applicant**

NAME	MR & MRS J. J. JONES, The Planning Application, 123 Main Street, London, EC1A 1AA
ADDRESS	123 Main Street, London, EC1A 1AA
POST CODE	EC1A 1AA
TELEPHONE	020 1234 5678
DATE	15/03/2024
PLANNING OFFICER	MR J. JONES
PLANNING NUMBER	24/01234/1

**LEGEND:**

- Extent of site (Unit No. 12) - 1517 sq m / 35152 sq ft
- Extent of all units within current ownership - 80007 sq m / 1,900,000 sq ft

1 Site Location Map.  
 SCALE 1:1000

REVISION DATE	REVISION DESCRIPTION