

Memo

To: John Moran, Mayor

From: Vincent Murray, Director of Services, Planning, Environment and Place Making

Date: 13/01/2025

Re: Part 8 proposal, Reference PT8LL161 – The proposed development at Ballycummin Road, Limerick, is for the construction of a three to five storey building to include 20 no. residential units (2 no. 5-bed ground floor community units; 1 no 1-bed ground floor unit; 9 no. 2-bed units and 8 no. 2-bed Universal Design units) to be accessed by a single stair and lift core; 1 no community room (32sqm) at ground floor and all ancillary spaces. The site works consist provision of the removal of 13 no. public car spaces to Ballycurnmin Road, provision of a new vehicular entrance, 15 no. new car spaces, a new covered bin store, 30 no. bike spaces, connection to existing water main and foul sewer and the provision of an underground attenuation tank. The development includes the provision of planting and associated landscape works.

Dear Mayor,

Please find attached for your consideration report prepared in accordance with Section 179 of the Planning and Development Act 2000 (as amended) in respect of a proposal for the construction of a three to five storey building to include 20 number residential units at Ballycummin Road, Raheen, Limerick.

The proposal prepared by the Housing Directorate has been evaluated taking into consideration all submissions received. It is concluded that the proposed development is in accordance with the objectives of the Limerick Development Plan, 2022 – 2028, and the proper planning and sustainable development of the area.

It is recommended that the proposed development be recommended to the Elected Members of Limerick City & County Council for their approval.

Signed: 
Jennifer Mc Nulty, Executive Planner

Signed: 
Barry Henn, Senior Executive Planner

Signed: 
Vincent Murray, Director of Services, Planning and Place Making

**MAYOR'S REPORT & RECOMMENDATION IN ACCORDANCE
WITH SECTION 179 3(a) OF THE PLANNING & DEVELOPMENT
ACT 2000 (AS AMENDED)**

Re: Part 8 Proposal for the following:

Development at Ballycummin Road, Limerick, for the construction of a three to five storey building to include 20 residential units (2 no. 5-bed ground floor community units; 1 no. 1-bed ground floor unit; 9 no. 2-bed units and 8 no. 2-bed Universal Design units) to be accessed by a single stair and lift core; 1 no. community room (32sqm) at ground floor and all ancillary spaces. The site works consist provision of the removal of 13 no. public car spaces to Ballycummin Road, provision of a new vehicular entrance, 15 no. new car spaces, a new covered bin store, 30 no. bike spaces, connection to existing water main and foul sewer and the provision of an underground attenuation tank. The development includes the provision of planting and associated landscape works.

1.0 Introduction

This report has been prepared pursuant to Section 179 of the Planning & Development Act 2000 (as amended), and Part 8 of the Planning & Development Regulations 2001 (as amended).

2.0 Description of the nature and extent of the proposed development

The proposal will consist of the construction of a three to five storey building to include 20 apartment units:

- 2 x no 5-bed ground floor community units;
- 1 x no 1-bed ground floor unit;
- 9 x no 2-bed units;
- 8 x no 2-bed Universal Design units
- 1 x no community room (32m²)

The apartments will be accessed by a single stair and lift core from the ground floor and all ancillary spaces. The site works will lead to the removal of 13 x no public car spaces located on the Ballycummin Road, provision of a new vehicular entrance, 15 x no new car spaces within the boundaries of the scheme, a new covered bin store, 30 x no bike spaces, connection to existing water main and foul sewer and the provision of an underground attenuation tank. The development includes the provision of planting and associated landscape works.

2.1 Site location

The proposed site is a greenfield located on the Ballycummin Road, Raheen, Limerick. The site is bounded to the rear by an internal road in the Raheen Industrial Estate and Analog Devices. Along the side boundary (north-west) is the Millennium Community Centre and Raheen Church. To the east is a Gas Networks Ireland compound and Willow Place residential development. To the north-east is the Ballycummin Road and The Forge existing residential area. The overall site boundary encompasses an area measuring approximately 0.26 hectares. It is proposed to construct a 20 unit apartment block over 5 floors with a total floor area of 2,558m². The site is in the ownership of Limerick City and County Council.



Plate 1 **Site Location**

2.2 Public Consultation:

The plans and particulars were placed on public display from the 14th of October, 2024 up to and including 12th of November, 2024. Submissions and observations were invited up to the 26th of November, 2024.

3.0 Submissions with respect to the proposed development

A total of 21 x No. written submissions/observations were received and are listed below:

No.	Name
1	Uisce Eirean
2	Tom Ryan
3	Barry Danaher
4	Sarah Mulcahy
5	Stephen Clearly
6	Gerard Cooney
7	Ann Harkin
8	Jim Mulcair
9	Michael O'Donnell
10	Emmett Shire
11	Kathleen Gallagher
12	Marion Burke
13	Mary Murphy
14	Thomas Gunning
15	Ann & Gerry McNamara
16	Caroline Copley

17	Liam & Antoinette Fitzgibbon
18	Larry & Trish White
19	Charlie & Liz Hanrahan
20	Limerick Pedestrian Network
21	Gas Networks Ireland

SUB (1) Uisce Éireann

Submission Summary:

A Confirmation of Feasibility (COF) letter was issued for the site noting both Water and Wastewater connections are feasible subject to upgrades. In relation to the Water Connection the COF letter noted - Feasible Subject to upgrades. A review is required of an existing Pressure Reducing Valve on the existing potable water network downstream of the proposed development to ensure the development is served with sufficient working pressure. It further noted the presence of an existing 750mm trunk water main which traverses the proposed site for development. A minimum separation distance of 8m shall apply between any proposed structure and the existing trunk water main. Should a diversion of this asset be proposed, the applicant is to contact diversions@water.ie

In relation to the Wastewater Connection the COF letter noted - Feasible Subject to upgrades. In order to complete the proposed connection at the premises, the Uisce Éireann wastewater network will have to be extended by approximately 50m. Uisce Éireann currently does not have any plans to extend its network in this area. Should the applicant wish to consider extending the public wastewater network to a point to connect to the Uisce Éireann network, please contact Uisce Éireann.

As noted in the COF, Uisce Éireann records indicate there is an existing 750mm Trunk Water main located within the development site. Uisce Éireann does not permit build over of its assets and the separation distances as per Uisce Éireann's Standards Codes and Practices must be achieved. This is a major piece of infrastructure serving the area and needs to be discussed with our Diversions Dept. If a Diversion of this pipe line is proposed, a separate Confirmation of Feasibility letter must be obtained by the applicant from Uisce Éireann's Diversions Department.

Mayor's Response:

The review of the existing PRV on the existing potable water network downstream of the proposed development would be undertaken by Uisce Éireann themselves at the time of the application for a connection. This would amount to a resetting of the PRV limits to achieve the required delivery pressure. The location of the 750mm watermain as detected by the GPR survey differs from that indicated on the Uisce Éireann utility maps. To reach consensus as to the exact location and the requirement for realignment or otherwise, a 'build-near' application has been submitted to diversions@water.ie in order that a design engineer may be assigned to the project for our engagement. This extension of the foul drainage network has been included in the proposed layouts. This extension design process will be progressed at the time that a connection application is made.

SUB (2) Tom Ryan

Submission Summary:

- (i) There is a long running investigation into discharges to stormwater from the Raheen Industrial Estate. A report by an International Environmental Consultancy has found that hazardous substances are being discharged to stormwater. These hazardous substances are discharged directly to groundwater due to the unique geology of the outfall. The outfall is in the vicinity of this development.
- (ii) Limerick City and County Council intend to discharge stormwater directly to ground in this development. The documents do not include any information on the geology of the site. Karst limestone is common in the area. How can the local authority decide to discharge to ground without information on the geology of the site? This approach would not be tolerated by a private developer.
- (iii) Under the Water Framework Directive groundwater must be assessed. Groundwater is important both as a drinking water source and as a pathway to surface water, and for ecosystems. Limerick City and County Council have a very poor record in the protection of groundwater coupled with their lack of understanding of the directives. The groundwater must be assessed for compliance with the Water Framework Directive on this development.
- (iv) The Raheen Industrial Estate has an aged infrastructure where there are misconnections between foul and storm, damaged pipes, and chambers. The integrity of the storm and foul networks has been compromised as shown in CCTV surveys. This information in the possession of Limerick City and County Council and must be included in the ground water assessment.

Mayor's Response:

- (i) The presence or otherwise of errant discharge in the external industrial estate falls outside the scope of the current application. The remit of the proposed application is to design the surface water management system to discharge at a greenfield runoff rate and to ensure that pollutants are isolated and treated appropriately. The proposed surface water design is based on measured infiltration rates, as appended to the Civil Design Report, and proposes to discharge to ground after passing through a petrol interceptor. Indeed, additional upstream nature-based elements of green roof, rain gardens and permeable paving offer pre-treatment and interception storage ahead of these conventional SuDS measures. In this way, the surface run-off rate exiting the site is reduced below that of greenfield rates and the water quality is at least equivalent to that of a greenfield.
- (ii) The online Geological Survey Ireland Spatial Resources GIS facility is accessible to the public and a cursory review indicates that the nearest recorded karst features are in excess of a kilometre from the site.
- (iii) A ground investigation was carried out which was used to design the surface water management system to discharge at a greenfield runoff rate and to ensure that pollutants are isolated and treated appropriately. The proposed surface water design is based on measured infiltration rates, as appended to the Civil Design Report, and proposes to discharge to ground after passing through a petrol interceptor. Indeed, additional upstream nature-based elements of green roof, rain gardens and permeable paving offer pre-treatment and interception storage ahead of these conventional SuDS measures. In this way, the surface run-off rate exiting the site is reduced below that of greenfield rates and the water quality is at least equivalent to that of a

greenfield. The EPA monitor the quality of groundwater, in addition to other water bodies, throughout the state.

- (iv) There is no connection to Raheen Industrial Estate infrastructure.

SUB (3) Barry Danaher

Submission Summary:

- (i) Traffic: The R510 and Nesson's Road cannot sustain any more housing units opening up without development of the road. The R510 has been subject to road upgrades which, while promote active travel, are causing far more traffic for motorists in the area. The St Nesson's Road, is at maximum capacity due to the volume of cars at UHL and the Crescent Shopping Centre. We, as local residents, cannot deal with any more traffic.
- (ii) Social Housing: The proposed unit being earmarked as social housing is counter productive for the area. I would have less of a problem with the development if it was for private ownership/rent. There has extensive expansion to our local area in recent years and has seen plenty of housing units built in Raheen/Mungret. There is social housing units in Baunacloka Heights already and putting more in the middle of already build up area is unfair to local residents and counter productive. There is more land towards Mungret that would be suitable for such a high rise building.
- (iii) Concerns about Anti Social behaviour: The local area is already busy with various amenities and services and as often the case with social housing, concerns of anti social behaviour is not something that we would need in the area. There is a church very nearby where many elderly people find sanctuary as should not be concerned about any anti social behaviour. There is a also a Mental Health centre on the St. Nesson's road very close to the proposed site where many vulnerable people will attend and again, I feel that they are at risk from potential anti social behaviour.
- (iv) Proximity to the Church; Raheen Church has a long and proud tradition of shaping and helping the local community. The proposed development will take lots of parking and footfall from attending a place of worship for many people in the area. Raheen church is also a focal point of the local parish and brings in a sizeable crowd every day.
- (v) Education: Schools in the local area are already at full capacity and cannot take in children living in these developments. This will cost the council money in terms of bussing them to a school elsewhere in the city or county. Children from local school also use the church for Sacramental preparation so I believe the building would be a child protection risk.
- (vi) Recommendations: I would implore the council to relocate the development to elsewhere in the county and to turn the site into a open green space to cater for the children, adults and elderly people in Raheen. The space also would promote mental health of people attending church and mental health service building. People are expected to adopt a green initiative to travel and every day living, yet an over-sized concrete structure is being placed in an area that would be better served as an open space. I hope that you find these concerns to be valid and will re-consider the proposed development.

Mayor's Response:

- (i) The capacity of the external road network has been assessed in accordance with TII guidelines in consultation with LCCC Transport Dept using industry-standard software. Junction capacities have been assessed for the proposed development with future projections up to the design year of 2041. Active travel linkages have likewise been assessed. Findings are listed in the TTA. The cumulative impact of the development on the surrounding road network is found to be minimal.

- (ii) The site is zoned for new residential development under Limerick City and Council Development Plan 2022-2028 and as such has been acquired for development of a elderly housing building. This is supported by the objectives outlined in national and local policy.
- (iii) The proposed demographic of the development is elderly residents and those in transition to independent living through the community units proposed in the development. We refer to the Architect's Design Statement submitted as part of the application for information. The experience of the Local Authority is that antisocial behaviour is quite low in this demographic.
- (iv) The proximity to St Nesson's Church has been considered sensitively by the design in terms of height scale and setback. The proposal for removal of parking has been discussed with the Church, the Local Authority Roads and Active Travel Departments and deemed to be acceptable in principle. It is expected that the future elderly residents of the development may make good use of the church facilities.
- (v) As a development of elderly housing units, it is not expected that the proposed development will impact the local school system.
- (vi) The proposal is in keeping with the established zoning objectives and development policy on both a local and national level.

SUB (4) Sarah Mulcahy

Submission Summary:

- (i) No Community engagement by LCCC with residents/ businesses within the area prior to Part 8 consultation/planning.
- (ii) Protected structures in the vicinity, as per Limericks Development Plan, this proposed development is adjacent to RPS Reg 1669 (St. Nessian's Church), Reg 1668 (former parochial house), Reg 1670 (Barry's Raheen)
- (iii) This proposed development would adversely impact character of area & it would set an undesirable precedent to development in foregrounds of protected structures, which materially contravenes development plan.
- (iv) The drawings attached to this planning file show the overpowering impact this development would have on the surrounding area. The visual impact, height should complement natural features etc., CGR09 of development plan deals with building height.
- (v) The Density is 87 units per ha which is almost double the development plan of 45 units per ha. There is a lack of amenities in the area. The open space recommended on development plan is 10% of development which in this case would equate to 256 sqm, the communal open space to south appears to be 237 sqm according to attached documents which is below the recommended amount, other private developers have been held to accommodate this need by LCCC so why is this application not treated the same?
- (vi) Drinking/ potable water supply – the existing water connections in the area are under demand and at times the pressure is affected, not to mention the additional demand of tankers carrying water to other towns (on behalf of LCCC/Irish water). According to a map attached to this planning there is a watermain within the site proposed boundary. What impact will this have to existing water supplies? Is there adequate supplies / pressure available to facilitate 20 additional units? Are upgrades required?
- (vii) Sewage facility with Irish water, is there capacity? Is there upgrades required? This system is under pressure & smell of sewage emanates around Raheen Church / South court roundabout etc. There is massive sewage issues as a result of the St Necessans Active travel works (by LCCC). Capacity issues from Raheen Industrial Estate & hundreds of existing houses in the area. Residents within housing developments adjacent to St Necessans active travel works have raised concerns with LCCC.
- (viii) Development plan HO04 -reuse of existing buildings. There are many buildings within Limerick city & urban areas which are not in use. No report supplied with this planning application to state the need for this development & that other existing buildings within Limerick are not usable. LCCC have lots of vacant properties which could be reused, some even for sale on behalf of LCCC within prime city centre locations.
- (ix) The AA screening report does not have any mention of Loughmore Common (pNHA) NPWS site code 000438 located within a short distance of proposed development. LCCC own website under biodiversity mentions Loughmore Common.
- (x) EH03 of development plan states ecological impact assessment to be carried out, it mentions opposite leaved pond weed, this is present in Loughmore Common. pNHA are subject to limited protection in the form of recognition of ecological value pf pNHA by Planning & Licence Authorities according to NPWS website. No ground investigations have been completed for this planning application, at least not available under the application, apart from the utilities study.

- (xi) Under the Water Framework Directive groundwater must be assessed. No assessment available under this planning application of groundwater.
- (xii) LCCC intend to discharge stormwater directly to ground in this development. The documents do not include any information on the geology of the site. EH09/6.3.4 of development plan sets out A karst base layer is present in much of this part of Limerick and drainage features such as turloughs are also present. Karst limestone is common in the area. How can the local authority decide to discharge to ground without information on the geology of the site? This approach would not be tolerated by a private developer. EH015 of development plan states LCCC objective is to protect ground and surface water resources.
- (xiii) The Raheen Business Park has an aged infrastructure where there are misconnections between foul and storm, damaged pipes, and chambers.
- (xiv) There is a long running investigation into discharges to stormwater from the Raheen Industrial Estate.
- (xv) EH022 of development plan commercial & industrial noise, given the proximity to Raheen Business Park & the mention in planning files of Analog noise being 75db. According to studies anything above 60db quality of life and sleep is affected. No mitigation measures are mentioned in planning documents.
- (xvi) Removing car spaces – these spaces are actively used by people using Raheen church and are often full. What alternative will be provided for these spaces?
- (xvii) Will services to local businesses in the area be affected by this development? Will any traffic implications affect the local businesses?
- (xviii) Planning conditions- who is going to monitor & enforce planning conditions? LCCC are effectively applying to themselves for planning permission. Local authorities are responsible for planning condition enforcements.

Mayor's Response:

- (i) The Part 8 process upholds a public publication and consultation period during which the public can make submissions relating to the application which will be considered by the Council.
- (ii) The proposed development is in excess of 35m from St Nessian's Church (RPS 1669) more than 135m from Former Parochial House (RPS 1668), and over 150m from Barry's (RPS 1670) As there is a more immediate adjacency between the development and St. Nessian's Church, the principles of sensitive approach to the protection of historical buildings has been applied with reference to the Limerick City and Council Development Plan 2022-2028 and Architectural Heritage Protection Guidelines for Planning Authorities (2011). It should be noted that the area is not an architectural conservation area, nor has it received any further designation beyond the protection of historical buildings. The height of the development has been set back in order to not detract from the architectural focus of the church on the corner of St Nessian's Road and Ballycummin Road.
- (iii) The proposed development is not in the foreground of any protected structure being that it is set off of each by minimum 35metres and does not sit in front of or obstruct any of the named protected structures.
- (iv) The residential context of the area provides for both low and medium density units to Ballycummin Road. Further, the industrial structures to the south increase the median height of the area, including CityGate House which is a 4 storey building. It is noted that LCCC have been providing for and approving taller buildings within the area, establishing a new architectural fabric for the area. Per the LCCC Development Plan

2022-2028, the preamble to CGR09 states: increased building height is an essential component in the optimisation of the capacity of urban sites to facilitate compact growth and achieve the transformational objectives of the MASP. The development site is urban, ie within the Metropolitan District of Limerick, Three to five storey development in this context is considered appropriate. This is supported by Urban Development and Building Heights Guidelines for Planning Authorities December 2018. SPPR 4 It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure: the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled "Sustainable Residential Development in Urban Areas (2007)" or any amending or replacement Guidelines; a greater mix of building heights and typologies in planning for the future development of suburban locations; and avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more.

- (v) Site Density per submitted documentation, 76.9units/HA. Table 2.7 of the LCCC Development Plan states min 45+ units per hectare in locations within 800m of Raheen Business Park. Map 2.3 "Core Maps" indicate the site location within Limerick City and Suburbs CSO Boundary (in Limerick). The target density for this area is between 35 and 100 units per HA, line 1 of Table 2.7 The required open space provision for the development is 10% of the site area, per Chapter 11 of the Development plan. The communal space provided is a combined total of high quality external landscaped communal space and a dedicated community room for residents use. It was at the suggestion of the planning authority that given the demographic of intended residents as elderly users, the provision of an internal room may benefit neighbourly engagement in the winter months. There is provision within the site to provide the full 256sqm of open space externally.
- (vi) The Confirmation of Feasibility provided by Uisce Eireann addresses these questions, and the requirements thereof have been assimilated into the design.
- (vii) The Confirmation of Feasibility provided by Uisce Eireann addresses these questions, and the requirements thereof have been assimilated into the design.
- (viii) There is no requirement in the planning process to provide an assessment of existing Local Authority assets. The development site subject of this application is in the ownership of LCCC and zoned for residential development. It is the mandate of the Local Authority to provide for and develop residential units for the municipal district via both existing and new development, in accordance with regional and national policy guidance.
- (ix) Per the requirements of Article 6(3) of the EU Habitats Directive, the Appropriate Assessment (AA) Screening is required to refer to European Sites (SACs and SPAs). It does not include for an assessment of pHNAs or NHAs. The Environmental Impact Assessment (EIA) Screening report addresses Loughmore Common pHNA (located 765m southwest from the subject site) and concludes no significant impacts are likely due to: The distance from the site; Lack of hydrological connectivity; The developments connection to public foul sewer; Implementation of standard construction phase controls. EHO3 of the LCCC Development Plan refers to requirement for an Environmental Impact Assessment to be carried out where "there are species of conservation concern". There are no such species on the subject site as identified by the EIA Screening Report by a qualified Ecologist.

- (x) Surface water management for the proposed development, as indicated above, passes through a treatment process prior to discharge to ground. While the Project Design Team cannot comment on the broader management of groundwater, the Ballycummin Road residential development surface water management design ensures that the combined approach of employing nature-based SuDS and conventional underground pipework achieves the aims of Water Quality and Water Quantity to the required standards applicable to residential developments. However, a broader groundwater assessment falls outside the scope of planning inputs for a single residential development, and would necessarily be undertaken as part of a broader study by a regional/national authority/agency.
- (xi) The online Geological Survey Ireland Spatial Resources GIS facility is accessible to the public and a cursory review indicates that the nearest recorded karst features are in excess of a kilometre from the site.
- (xii) Surface water management for the proposed development, as indicated above, passes through a treatment process prior to discharge to ground. While the application cannot comment on the broader management of groundwater, the Ballycummin Road residential development surface water management design ensures that the combined approach of employing nature-based SuDS and conventional underground pipework achieves the aims of Water Quality and Water Quantity to the required standards applicable to residential developments
- (xiii) This exercise falls outside of the remit of a single application for residential development within the remit of the EPA.
- (xiv) Drinking water supplied by Uisce Eireann passes through a rigorous treatment process before entering the distribution network. The proposed surface water design is based on measured infiltration rates, as appended to the Civil Design Report, and proposes to discharge to ground after passing through a petrol interceptor. Indeed, additional upstream nature-based elements of green roof, rain gardens and permeable paving offer pre-treatment and interception storage ahead of these conventional SuDS measures. In this way, the surface run-off rate exiting the site is reduced below that of greenfield rates and the water quality is at least equivalent to that of a greenfield.
- (xv) Detailed design mitigation measures are mentioned in the Architect's Design Statement. Detailed measurements are being carried out on the site to ascertain Lden and Lnight levels (a measure of environmental noise levels). Appropriate specifications for materials, ie window, wall and doors to be developed on the basis of these results in accordance with BS 4142.
- (xvi) It is essential to remove 13no spaces to accommodate sight lines emerging from the development and particularly for emergency vehicles accessing the front of the proposed building, in accordance with Second Schedule to the Building Regulations, Technical Guidance Document B. The Traffic and Transport Assessment accounts for completed developments based on current traffic count numbers, makes projections based on approved unbuild developments in the area and also reports on "design year 2041", including any impact from the proposed development. There is a reported minor impact from the proposed development for "design year 2041" only, ie no impact from the development on the surrounding junctions current capacity. The scheme is supported by an expanding frequent public transport network which will allow residents access to local amenities and the city centre which is 5km from the development site. It is the objective of the Local Authority to integrate sustainable transport measures into the management and operation of the proposed residential development for both residents and visitors.

- (xvii) It is assumed this part of the submission refers to the construction stage of the development. It is intended that no disruption would take place to utilities to local business or residents. No works relating to traffic are intended. Service connections in the public road will be required, as will essential Uisce Eireann upgrades to the public foul sewer to the long term benefit of the surrounding area.
- (xviii) The delivery of this development will follow best practice and meet technical standards as outlined in the reports submitted with the application.

SUB (5) Stephen Cleary

Submission Summary:

Concerns include:

- (i) Not suitable for the area Does not fit in with existing buildings. Too big for the area.
- (ii) Protected structures in the area, too close to historical building -St Nessans Church
- (iii) Too close to industrial estate – noise & pollution to be considered.
- (iv) Previously Limerick Council carried out survey with Paul O Raw for need of a community centre in Raheen Dooradoyle Mungret area would this site not be more suited for a community centre which is needed in the area
- (v) Significant impact arising from development increased demand on amenities in the area which are not adequate/ impact on existing properties in the vicinity. Could lead to anti social behaviour.
- (vi) Drinking water supply – the existing water connections in the area are under demand and at times the pressure is affected. The quality of water is poor.
- (vii) Sewage facility with Irish water, This system is under pressure & smell of sewage around Raheen Church / South court roundabout etc. There is massive sewage issues as a result of the St Nessans Active travel works. Capacity issues from Raheen Industrial Estate & hundreds of existing houses in the area.
- (viii) reuse of existing buildings. There are many buildings within Limerick city & urban areas which are not in use.
- (ix) The AA screening report does not have any mention of Loughmore Common (pNHA) located within a short distance of proposed development.
- (x) No ground investigations have been completed for this planning application. Private developers need to carry out ground investigations prior to planning applications eg percolation test. Why are the council exempt from this? Is it one rule for them & another rule for others?
- (xi) Under the Water Framework Directive groundwater must be assessed. No assessment available. The groundwater must be assessed for compliance. Are the council going to guess the answers?
- (xii) intend to discharge stormwater directly to ground in this development. The documents do not include any information on the geology of the site. Development plan states objective is to protect ground and surface water resources.
- (xiii) Removing car spaces – these spaces are actively used by people using Raheen church and are often full. What alternative will be provided for these spaces? If no alternative provided then double parking will happen outside houses etc & double parking on roadways making the road narrower & creating road safety issues. Are Limerick Council going to ignore the fact that people drive? Are they going to assume we are all going to jump on bicycles considering that these spaces are mostly used by the elderly.
- (xiv) The traffic assessment which has an Oct 2024 date states some planning applications that were granted, there are currently active plannings which will add to traffic which was not accounted for 253 residential units Cumulative impact needs to be reviewed. Traffic in the area is already a nightmare with tail backs each day. The Junction at St Nessans church is already under pressure, poorly laid out & will not be able to withstand more traffic from more housing units.

Mayor's Response:

- (i) The development site is urban, within the Metropolitan District of Limerick, Three to five storey development in this context is considered appropriate. This is supported by Urban Development and Building Heights Guidelines for Planning Authorities December 2018. The height of the development has been set back in order to not detract from the architectural focus of the church on the corner of St Nesson's Road and Ballycummin Road.
- (ii) As there is an immediate adjacency between the development and St. Nesson's Church, the principles of sensitive approach to the protection of historical buildings have been applied with reference to the Limerick City and Council Development Plan 2022-2028 and Architectural Heritage Protection Guidelines for Planning Authorities (2011). It should be noted that the area is not an architectural conservation area, nor has it received any further designation beyond the protection of historical buildings.
- (iii) Detailed design mitigation measures are mentioned in the Architect's Design Statement. Detailed measurements are being carried out on the site to ascertain Lden and Lnight levels. Appropriate specifications for materials, ie window, wall and doors to be developed on the basis of these results in accordance with BS 4142.
- (iv) The development site is zoned for "New Residential" development. As part of the development, a "community room" is proposed. This is intended for use by the elderly residents so as to provide recreation space for gathering. The development application cannot comment further on the surveys for community facilities completed within the area.
- (v) The proposed demographic of the development is elderly residents and those in transition to independent living through the community units proposed in the development. We refer to the Architect's Design Statement submitted as part of the application for information. The experience of the Local Authority is that antisocial behaviour is quite low in this demographic.
- (vi) The Confirmation of Feasibility provided by Uisce Eireann addresses these questions, and the requirements thereof have been assimilated into the design.
- (vii) The Confirmation of Feasibility provided by Uisce Eireann addresses these questions, and the requirements thereof have been assimilated into the design.
- (viii) There is no requirement in the planning process to provide an assessment of existing Local Authority assets. The development site subject of this application is in the ownership of LCCC and zoned for residential development. It is the mandate of the Local Authority to provide for and develop residential units for the municipal district via both existing and new development, in accordance with regional and national policy guidance.
- (ix) Per the requirements of Article 6(3) of the EU Habitats Directive, the Appropriate Assessment (AA) Screening is required to refer to European Sites (SACs and SPAs). It does not include for an assessment of pHNAs or NHAs. The Environmental Impact Assessment (EIA) Screening report addresses Loughmore Common pHNA (located 765m southwest from the subject site) and concludes no significant impacts are likely due to: The distance from the site; Lack of hydrological connectivity; The developments connection to public foul sewer; Implementation of standard construction phase controls. EHO3 of the LCCC Development Plan refers to requirement for an Environmental Impact Assessment to be carried out where "there are species of conservation concern". There are no such species on the subject site as identified by the EIA Screening Report by a qualified Ecologist.
- (x) Ground investigation has been carried out and is referred to in the Civil Design Report.

- (xi) A ground investigation was carried out which was used to design the surface water management system to discharge at a greenfield runoff rate and to ensure that pollutants are isolated and treated appropriately. The proposed surface water design is based on measured infiltration rates, as appended to the Civil Design Report, and proposes to discharge to ground after passing through a petrol interceptor. Indeed, additional upstream nature-based elements of green roof, rain gardens and permeable paving offer pre-treatment and interception storage ahead of these conventional SuDS measures. In this way, the surface run-off rate exiting the site is reduced below that of greenfield rates and the water quality is at least equivalent to that of a greenfield. The EPA monitor the quality of groundwater, in addition to other water bodies, throughout the state.
- (xii) Information available in the public domain identifies the nearest known karst feature in excess of one kilometre from the site. As such, no more than a geotechnical investigation is deemed necessary to identify geotechnical design parameters. This has been completed and referred to in the Civil Design Report. In addition, the design calls for the use of SuDS measures, both nature-based solutions and conventional petrol interceptors upstream of soak aways are proposed. These measures are deemed appropriate, responsible measures to ensure that discharge to ground is of a suitable water quality.
- (xiii) It is essential to remove 13no spaces to accommodate sight lines emerging from the development and particularly for emergency vehicles accessing the front of the proposed building, in accordance with Second Schedule to the Building Regulations, Technical Guidance Document B. The car spaces to this road are owned and operated by the Local Authority, and every possible liaison has been made with Roads and Active Travel Teams in advance of submitting this application.
- (xiv) The capacity of junctions is an objective measure, whereas expectations of comfort levels is a subjective, particularly when demand on junctions is observed to increase over time. It is appreciated that tail backs occur at junctions; however, this in itself does not constitute a exceeding of capacity. Capacities have been calculated based on current observances of traffic loading and projected for future growth, which includes such schemes as may currently be in planning stage. It is appreciated, furthermore, that until developments have been granted approval, their specific impacts cannot be individually isolated in the traffic studies. Rather, the methodology, as outlined in the TTA, must at least make allowance for reasonably-foreseeable growth in traffic demands which, by definition, includes developments in planning stage that are aligned with the local area plan, unnamed as they may be.

SUB (6) Gerard Cooney**Submission Summary:**

The Raheen area has planning for literally hundreds of housing units over the next few years including a proposed multi storey apartment complex at the South Court Hotel. There are no amenities for young people in the area and no plans for any that I am aware of this site would be ideal for a youth centre or meeting place. There would appear to be a complete lack of planning for the future in this already high density area. With all the available land around Mungret college for building why put this development in an area so lacking in facilities.

Mayor's Response:

The site is zoned for new residential development under Limerick City and Council Development Plan 2022-2028 and as such has been acquired for development of an elderly housing building. This is supported by the objectives outlined in national and local policy.

SUB (7) Ann Harkin**Submission Summary:**

Firstly highest building on that road is 3 storey high it will look out of place. Secondly we will lose at least 5 parking places and where will the bus be able to stop. With Church so near every parking space is needed and with 20 apartments in the building a lot of parking will be required. I am living in 4 The Forge, Raheen and we will have a major problem with cars parking in our estate on Sundays and with funerals in the local church.

Mayor's Response:

The building is located in excess of 22m beyond existing residential dwellings, which is acknowledged by the development plan as the minimum separation distance for overlooking. The overall height of the building is a single storey above the built datum in the area, which is within an appropriate range of scale. It is essential to remove 13 no spaces to accommodate sight lines emerging from the development and particularly for emergency vehicles accessing the front of the proposed building, in accordance with Second Schedule to the Building Regulations, Technical Guidance Document B. The car spaces to this road are owned and operated by the Local Authority, and every possible liaison has been made with Roads and Active Travel Teams in advance of submitting this application.

SUB (8) Jim Mulcair**Submission Summary:**

As a home owner at 8 The Forge, Raheen, I have serious reservations about this planning application. The removal of 13 parking spaces will have serious consequences on the exit from the Forge. The height of this building will ruin of view coming out of our estate. We already have a number of apartments built in our area.

Mayor's Response:

It is essential to remove 13no spaces to accommodate sight lines emerging from the development and particularly for emergency vehicles accessing the front of the proposed building, in accordance with Second Schedule to the Building Regulations, Technical Guidance Document B. The car spaces to this road are owned and operated by the Local Authority, and every possible liaison has been made with Roads and Active Travel Teams in advance of submitting this application.

SUB (9) Michael O'Donnell

Submission Summary:

Concerns include:

- (i) It is not suitable for the area and it is not in keeping with the area.
- (ii) It is overlooking a protected structure and house ie. St. Nessans church.
- (iii) The building will be towering over church and surrounding buildings.
- (iv) The removal of 13 car parking spaces on the road will lead to cars parking outside our homes, on the footpaths which is not safe due to excessive speed. This will lead to an accident.
- (v) I am also concerned regarding the devaluation of our properties having apartments built on the corner and taking light and privacy of our homes.
- (vi) On health and safety grounds i am concerned that the scale of proposed development will lead to further issues of parking and congestion on the road similar to the issues already in the surrounding area due to the hospital parking situation. If the proposed development proceeds this will lead to accidents on this already dangerous road.
- (vii) Traffic on Ballycummin road cannot sustain any more housing units opening up without development of the road. Ballycummin road is at its maximum capacity due to the volume of cars at UHL, the Crescent Shopping Centre, St. Pauls National School, St. Nessans National School and Raheen Industrial Estate. The proposed development will take lots of parking and footfall from people attending mass at Raheen Church.
- (viii) No community engagement by LCC with residents/Businesses within the area prior to part 8 consultation/planning. Other local authorities have public engagement with residents in the area.

Mayor's Response:

- (i) The site is zoned for new residential development under Limerick City and Council Development Plan 2022-2028 and as such has been acquired for development of a elderly housing building. This is supported by the objectives outlined in national and local policy.
- (ii) As there is an immediate adjacency between the development and St. Nessan's Church, the principles of sensitive approach to the protection of historical buildings has been applied with reference to the Limerick City and Council Development Plan 2022-2028 and Architectural Heritage Protection Guidelines for Planning Authorities (2011). It should be noted that the area is not an architectural conservation area, nor has it received any further designation beyond the protection of historical buildings.
- (iii) The building is located in excess of 22m beyond existing residential dwellings, which is acknowledged by the development plan as the minimum separation distance for overlooking. The overall height of the building is a single storey above the built datum in the area, which is within an appropriate range of scale.
- (iv) It is essential to remove 13no spaces to accommodate sight lines emerging from the development and particularly for emergency vehicles accessing the front of the proposed building, in accordance with Second Schedule to the Building Regulations, Technical Guidance Document B. The car spaces to this road are owned and operated by the Local Authority, and every possible liaison has been made with Roads and Active Travel Teams
- (v) The devaluation of local private property is not a material planning consideration upheld by local or national policy or guidance. The Local Authority has no control over the fluctuating value of property. An overshadowing study has been submitted with the

application which confirms that surrounding dwellings benefit from ample sunlight throughout the year. The impact of the proposed building is negligible on this space given the space separation between the subject development and surrounding buildings. in advance of submitting this application. It is the duty of each driver to park legally and pay the requisite parking fee.

- (vi) The capacity of the external road network has been assessed in accordance with TII guidelines in consultation with LCCC Transport Dept using industry-standard software. Junction capacities have been assessed for the proposed development with future projections up to the design year of 2041. Active travel linkages have likewise been assessed. Findings are listed in the TTA. The cumulative impact of the development on the surrounding road network is found to be minimal.
- (vii) The capacity of the external road network has been assessed in accordance with TII guidelines in consultation with LCCC Transport Dept using industry-standard software. Junction capacities have been assessed for the proposed development with future projections up to the design year of 2041. Active travel linkages have likewise been assessed. Findings are listed in the TTA. The cumulative impact of the development on the surrounding road network is found to be minimal.
- (viii) The Part 8 process upholds a public publication and consultation period during which the public can make submissions relating to the application which will be considered by the Council.

SUB (10) Emmet Shire

Submission Summary:

Concerns include:

- (i) This is an elevated site, the highest point on Ballycummin Road. A five storey building would tower over all nearby buildings, over looking neighbouring dwellings. It is the most unsuitable site for such a tall building.
- (ii) The proposed high rise development is next to St. Nessen's Church a protected structure.
- (iii) It is planned to remove 13No. parking spaces from Ballycummin road. Due to cycle and bus lanes on St. Nessen's road all parking for Raheen Church has been removed. Currently during funerals and busy church gatherings parking spaces are at a premium and leads to double and dangerous parking causing traffic congestion. Any plan to remove parking especially 13No. spaces is a very bad plan.
- (iv) The proposed development has 20No. housing units, 2 have 5 bedrooms but yet only 13No. car spaces and 2 disabled will be provided on site. Several residents and any visitors will have to park opposite side of Ballycummin road walking back and forth across the busy road, since the majority of the existing spaces have been removed to cater for this development. All adding to the parking problems previously mentioned.
- (v) The proposed development has 20No. housing units, 2 have 5 bedrooms but yet only Limestone is found at a shallow depth on many nearby sites. LCCC propose to discharge storm water directly to the ground in this site adding to already well documented problems.
- (vi) This site is the only green space left on Ballycummin road and now LCCC plan the tallest and highest density apartment building in the area to occupy it.
- (vii) We believe there are possible plans for a future cycle lane down Ballycummin road, no doubt this would also impact on car parking spaces. Since this site is now in council ownership surely the best use for it would be a car park for Raheen church.
- (viii) It is obvious that a private developer would not get planning permission for such a development. So why should Limerick city and county council give planning permission to themselves.
- (ix) LCCC have made no effort to engage with the local residents regarding a development of this scale or who they intend to house.
- (x) A development of the type and scale could only contribute to devaluing all houses in the wider area.

Mayor's Response:

- (i) The building is located in excess of 22m beyond existing residential dwellings, which is acknowledged by the development plan as the minimum separation distance for overlooking. The overall height of the building is a single storey above the built datum in the area, which is within an appropriate range of scale.
- (ii) As there is an immediate adjacency between the development and St. Nessen's Church, the principles of sensitive approach to the protection of historical buildings has been applied with reference to the Limerick City and Council Development Plan 2022-2028 and Architectural Heritage Protection Guidelines for Planning Authorities (2011). It should be noted that the area is not an architectural conservation area, nor has it received any further designation beyond the protection of historical buildings.
- (iii) It is essential to remove 13no spaces to accommodate sight lines emerging from the development and particularly for emergency vehicles accessing the front of the

proposed building, in accordance with Second Schedule to the Building Regulations, Technical Guidance Document B. The car spaces to this road are owned and operated by the Local Authority, and every possible liaison has been made with Roads and Active Travel Teams in advance of submitting this application.

- (iv) As an elderly persons residence, it is not envisaged that each resident will own or have access to a car. The proposed number of spaces is within in the range allowed by the Limerick City and County Development Plan 2022-2028 and has been discussed with the Planning and Transport Departments. The scheme is supported by an expanding frequent public transport network which will allow residents access to local amenities and the city centre which is 5km from the development site. It is the objective of the Local Authority to integrate sustainable transport measures into the management and operation of the proposed residential development for both residents and visitors.
- (v) The online Geological Survey Ireland Spatial Resources GIS facility is accessible to the public and a cursory review indicates that the nearest recorded karst features are in excess of a kilometre from the site.
- (vi) There is an established urban grain of residential dwellings on Ballycummin Road that the development is in keeping with. It is considered to be an infill development, in keeping with local and national development policy.
- (vii) There are plans within the Local Authority to expand the active travel network in Limerick City and County. This is not subject of the planning application in question.
- (viii) This comment is not substantiated by any local or national policy.
- (ix) The proposed development is described by the drawings and documents which accompany the application, in accordance with the Planning and Development Regulations for Part 8 applications. The Part 8 process upholds a public publication and consultation period during which the public can make submissions relating to the application which will be considered by the Council.
- (x) The devaluation of local private property is not a material planning consideration upheld by local or national policy or guidance. The Local Authority has no control over the fluctuating value of property.

SUB (11) Kathleen Gallagher

Submission Summary:

- (i) The height of the building, it will tower over the nearby church and the houses in the Forge.
- (ii) This is a very busy road, lots of traffic, it is currently very difficult to exit from the Forge on this road when cars are illegally parked next to the exit,
- (iii) The removal of parking spaces will cause chaos during mass times and funerals. The entrance to these proposed apartments is directly across from the bus stop on an already busy road.
- (iv) The lack of consultation by the public representatives with the local residents.

Mayor's Response:

- (i) The building is located in excess of 22m beyond existing residential dwellings, which is acknowledged by the development plan as the minimum separation distance for overlooking. The overall height of the building is a single storey above the built datum in the area, which is within an appropriate range of scale.
- (ii) The car spaces to this road are owned and operated by the Local Authority, and every possible liaison has been made with Roads and Active Travel Teams in advance of submitting this application.
- (iii) The capacity of the external road network has been assessed in accordance with TII guidelines in consultation with LCCC Transport Dept using industry-standard software. Junction capacities have been assessed for the proposed development with future projections up to the design year of 2041. Active travel linkages have likewise been assessed. Findings are listed in the TTA. The cumulative impact of the development on the surrounding road network is found to be minimal.
- (iv) The Part 8 process upholds a public publication and consultation period during which the public can make submissions relating to the application which will be considered by the Council.

SUB (12) Marion Burke

Submission Summary:

- (i) The proposed development is totally unsuitable for the proposed location, being out of keeping with the character of the area
- (ii) The proposed development is much taller than existing buildings in the immediate vicinity and its dominant structure will overlook an existing protected structure and house ie. St. Nessans church.
- (iii) The building will be towering over church and surrounding private residences leading to a complete loss of privacy for the owners and users of those properties.
- (iv) The development will add significantly to existing traffic congestion in the area. The removal of 13 car parking spaces on the road will impact negatively on patrons of Raheen church leading to cars parking outside existing homes and on the footpaths, resulting in significant safety risks.
- (v) Ballycummin road is currently well beyond safe capacity levels for traffic and does not have the ability to safely handle any further traffic.
- (vi) The current level of development in the Raheen / Mungret area is significant and to a large extent is happening without proper planning for complimentary community and other support development. There is a real concern that this will lead to anti-social problems. Adding in developments such as that proposed in an area unsuited to the objective, just demonstrates how little our planners have learned from previous experiences.
- (vii) The loss of privacy in surrounding properties, the negative implications for existing protected structures, the negative impact on traffic and the potential for anti social activity all potentially and unfairly devalues existing properties in the area.
- (viii) No community engagement by LCC with residents/Businesses within the area prior to part 8 consultation/planning. Other local authorities have public engagement with residents in the area.

Mayor's Response:

- (i) The site is zoned for new residential development under Limerick City and Council Development Plan 2022-2028 and as such has been acquired for development of a elderly housing building. This is supported by the objectives outlined in national and local policy.
- (ii) As there is an immediate adjacency between the development and St. Nessan's Church, the principles of sensitive approach to the protection of historical buildings has been applied with reference to the Limerick City and Council Development Plan 2022-2028 and Architectural Heritage Protection Guidelines for Planning Authorities (2011). It should be noted that the area is not an architectural conservation area, nor has it received any further designation beyond the protection of historical buildings.
- (iii) The building is located in excess of 22m beyond existing residential dwellings, which is acknowledged by the development plan as the minimum separation distance for overlooking. The overall height of the building is a single storey above the built datum in the area, which is within an appropriate range of scale.
- (iv) The capacity of the external road network has been assessed in accordance with TII guidelines in consultation with LCCC Transport Dept using industry-standard software. Junction capacities have been assessed for the proposed development with future projections up to the design year of 2041. Active travel linkages have likewise

- been assessed. Findings are listed in the TTA. The cumulative impact of the development on the surrounding road network is found to be minimal.
- (v) The capacity of the external road network has been assessed in accordance with TII guidelines in consultation with LCCC Transport Dept using industry-standard software. Junction capacities have been assessed for the proposed development with future projections up to the design year of 2041. Active travel linkages have likewise been assessed. Findings are listed in the TTA. The cumulative impact of the development on the surrounding road network is found to be minimal.
 - (vi) The proposed demographic of the development is elderly residents and those in transition to independent living through the community units proposed in the development. We refer to the Architect's Design Statement submitted as part of the application for information. The experience of the Local Authority is that antisocial behaviour is quite low in this demographic.
 - (vii) There is no evidence to suggest that the proposal would devalue properties in the area.
 - (viii) The Part 8 process upholds a public publication and consultation period during which the public can make submissions relating to the application which will be considered by the Council.

SUB (13) Mary Murphy

Submission Summary:

- (i) A 3 to 5 storey building in this very compact site will look completely out of place in the surrounding environment. The Church, nearby apartments and houses will be dwarfed by this monstrosity and made look like postage stamps.
- (ii) Ballycummin Rd is a busy Rd at the best of times. Residents of Castlegrange & The Forge have difficulty at present with exiting & entering these estates.
- (iii) Bus stop directly across the Rd from proposed building.
- (iv) The removal of parking spaces adjacent to the church will cause mayhem at all mass, Funeral, Wedding, Communion, Confirmation and other church events.. It will force the parishioners to park illegally in the nearby estates thus causing hazards to the residents both young & old.
- (v) The Millennium Centre is attached to the Church. This is used weekly by the elder parishioners for activities and those parking spaces are vital to them.

Mayor's Response:

- (i) As there is an immediate adjacency between the development and St. Nessan's Church, the principles of sensitive approach to the protection of historical buildings have been applied with reference to the Limerick Development Plan 2022-2028 and Architectural Heritage Protection Guidelines for Planning Authorities (2011). It should be noted that the area is not an architectural conservation area, nor has it received any further designation beyond the protection of historical buildings.
- (ii) The capacity of the external road network has been assessed in accordance with TII guidelines in consultation with LCCC Transport Dept using industry-standard software. Junction capacities have been assessed for the proposed development with future projections up to the design year of 2041. Active travel linkages have likewise been assessed. Findings are listed in the TTA. The cumulative impact of the development on the surrounding road network is found to be minimal.
- (iii) The scheme is supported by an expanding frequent public transport network which will allow residents access to local amenities and the city centre which is 5km from the development site. It is the objective of the Local Authority to integrate sustainable transport measures into the management and operation of the proposed residential development for both residents and visitors.
- (iv) It is essential to remove 13no spaces to accommodate sight lines emerging from the development and particularly for emergency vehicles accessing the front of the proposed building, in accordance with Second Schedule to the Building Regulations, Technical Guidance Document B. The car spaces to this road are owned and operated by the Local Authority, and every possible liaison has been made with Roads and Active Travel Teams in advance of submitting this application. It is the duty of each driver to park legally and pay the requisite parking fee.
- (v) See above.

SUB (14) Thomas Gunning

Submission Summary:

- (i) Height of the proposed building. As the site concerned is at the top of a hill and is the highest point on the road, the proposed 5 stories will be in my view not in keeping with buildings in the surrounding area and will look out of character.
- (ii) Restriction to existing parking and overall safety. Exiting currently from The Forge is already hazardous due to the Bus stop on the left of the entrance and the proximity of the parking slots on the right. To open a further entrance /exit on the proposed site at the opposite side of the road will hugely add to the dangers of exiting the estate. In addition the proposed reduction in parking spaces will have a negative impact on parking in the area during a large event in Raheen Church resulting in possible inaccessibility to emergency services to the estate.

Mayor's Response:

- (i) The site is zoned for new residential development under Limerick City and Council Development Plan 2022-2028 and as such has been acquired for development of a elderly housing building. This is supported by the objectives outlined in national and local policy.
- (ii) The capacity of the external road network has been assessed in accordance with TII guidelines in consultation with LCCC Transport Dept using industry-standard software. Junction capacities have been assessed for the proposed development with future projections up to the design year of 2041. Active travel linkages have likewise been assessed. Findings are listed in the TTA. The cumulative impact of the development on the surrounding road network is found to be minimal. It is essential to remove 13no spaces to accommodate sight lines emerging from the development and particularly for emergency vehicles accessing the front of the proposed building, in accordance with Second Schedule to the Building Regulations, Technical Guidance Document B. The car spaces to this road are owned and operated by the Local Authority, and every possible liaison has been made with Roads and Active Travel Teams in advance of submitting this application.

SUB (15) Ann & Gerry McNamara

Submission Summary:

- (i) This proposal is overdevelopment of a small site Height of proposed development of 5 & 3, story is not in keeping with surrounding landscape. This development lacks a sufficient space to have a comprehensive outdoor green area for residents to enjoy. The millennium centre and Parochial house will be totally overpowered by such an enormous building This development will cause overshadowing of existing houses and the apartments across the Rd. from this proposed development. This development will cause invasion of privacy of back gardens and the houses in The Forge estate Raheen.
- (ii) Already the area is oversubscribed by apartment buildings. Within 100 meters of the proposed development there are a further 3 Apartment complexes. An Dún Apt complex and retail units Castle Grange Apt. Complex. Holiday Home, Castle Grange Apt complex.
- (iii) The Ballycummin Rd has now become a major feeder Rd and as a result traffic congestion is at an all-time high. Making it impossible to gain access to the road for nearby housing areas The Ballycummin Road services the following major employers of the area. UHL and its ancillary services, Raheen Industrial estate which has major employment industries. Young children are constantly being put at risk by this situation on a regular basis
- (iv) It has been most disappointing and frustrating that Limerick City and County Council never engaged with local residents regarding this proposed development.

Mayor's Response:

- (i) The site is zoned for new residential development under Limerick City and Council Development Plan 2022-2028 and as such has been acquired for development of a elderly housing building. This is supported by the objectives outlined in national and local policy. The building is located in excess of 22m beyond existing residential dwellings, which is acknowledged by the development plan as the minimum separation distance for overlooking. The overall height of the building is a single storey above the built datum in the area, which is within an appropriate range of scale.
- (ii) The Development Plan supports a mixed housing supply including a range of density solutions, dwelling houses and apartments.
- (iii) The capacity of the external road network has been assessed in accordance with TII guidelines in consultation with LCCC Transport Dept using industry-standard software. Junction capacities have been assessed for the proposed development with future projections up to the design year of 2041. Active travel linkages have likewise been assessed. Findings are listed in the TTA. The cumulative impact of the development on the surrounding road network is found to be minimal. It is essential to remove 13no spaces to accommodate sight lines emerging from the development and particularly for emergency vehicles accessing the front of the proposed building, in accordance with Second Schedule to the Building Regulations, Technical Guidance Document B. The car spaces to this road are owned and operated by the Local Authority, and every possible liaison has been made with Roads and Active Travel Teams in advance of submitting this application.
- (iv) The Part 8 process upholds a public publication and consultation period during which the public can make submissions relating to the application which will be considered by the Council.

SUB (16) Caroline Copley

Submission Summary:

- (i) We strongly object to the height of the proposed development at Ballycummin Road. The proposed development will be situated at the top of a hill and will overlook all surrounding properties and is not in keeping with the surrounding infrastructure, it will be situated right next to the historical Raheen church.
- (ii) Parking or lack of parking is already an issue in the area as on occasions of mass, wedding and funerals cars have to park on footpaths or in our estate as there is already a lack of parking and you are proposing that we loss many more. Having a family member as a wheelchair user we often have to go out on the roads to get past these cars that are parked all over the footpaths to go about our daily business which is a major safety issue.
- (iii) We would also question the suitability of housing people with disabilities in a high rise building in the advent of an emergency.

Mayor's Response:

- (i) It is disputed that the site is at the top of a hill, as the highest point in the area, from widely available topographical information, is further southwest on Ballycummin Road, at 6m above the site datum. As there is an immediate adjacency between the development and St. Nessan's Church, the principles of sensitive approach to the protection of historical buildings has been applied with reference to the Limerick City and Council Development Plan 2022-2028 and Architectural Heritage Protection Guidelines for Planning Authorities (2011). It should be noted that the area is not an architectural conservation area, nor has it received any further designation beyond the protection of historical buildings.
- (ii) The capacity of the external road network has been assessed in accordance with TII guidelines in consultation with LCCC Transport Dept using industry-standard software. Junction capacities have been assessed for the proposed development with future projections up to the design year of 2041. Active travel linkages have likewise been assessed. Findings are listed in the TTA. The cumulative impact of the development on the surrounding road network is found to be minimal. It is essential to remove 13no spaces to accommodate sight lines emerging from the development and particularly for emergency vehicles accessing the front of the proposed building, in accordance with Second Schedule to the Building Regulations, Technical Guidance Document B. The car spaces to this road are owned and operated by the Local Authority, and every possible liaison has been made with Roads and Active Travel Teams in advance of submitting this application.
- (iii) The building has been designed in accordance with the Second Schedule of the Building Regulations and on the basis of appropriate Universal Design Principles for use by residents with various abilities. A Fire Safety Certificate and Disability Access Certificate will be obtained in advance of construction. For the avoidance of doubt, in the context of Building Regulations and Fire Safety, a five storey building is not considered high rise.

SUB (17) Liam & Antoinette Fitzgibbon

Submission Summary:

- (i) That nothing be done to hinder or obstruct our exercise of our right of way.
- (ii) That all necessary steps be taken to ensure the security of our property and the maintenance of the right of way be preserved in the event of any future development of the site by the IDA or any third party.
- (iii) The height and close proximity of the proposed development would negatively impact on our right to privacy.
- (iv) The excessive height of the proposed development is inappropriate and would negatively impact on the surrounding residential area.
- (v) The density of the proposed development would add to traffic congestion and to the already significant traffic hazards on both the Ballycummin Rd. and at the junction of Ballycummin Rd. with the R526 next to St. Nessian's Church.

Mayor's Response:

- (i) The lands being referred to are outside the boundary of the subject application. There is no proposed interference by the application over the site.
- (ii) Any future development of the subject site shall pay due regard to the safety and security of the boundary.
- (iii) The proposed development is 50m from the neighbouring property "Whitehouse" which is in excess of what is acknowledged by the Development Plan as being minimum separation for overlooking (22m).
- (iv) The overall height of the building is a single storey above the built datum in the area, which is within an appropriate range of scale. Per the LCCC Development Plan 2022-2028, the preamble to CGR09 states: increased building height is an essential component in the optimisation of the capacity of urban sites to facilitate compact growth and achieve the transformational objectives of the MASP. This is supported by Urban Development and Building Heights Guidelines for Planning Authorities December 2018.
- (v) The capacity of the external road network has been assessed in accordance with TII guidelines in consultation with LCCC Transport Dept using industry-standard software. Junction capacities have been assessed for the proposed development with future projections up to the design year of 2041. Active travel linkages have likewise been assessed. Findings are listed in the TTA. The cumulative impact of the development on the surrounding road network is found to be minimal.

SUB (18) Larry & Trish White

Submission Summary:

- (i) This development, at 5 stories, is simply too tall and out of character for this area. From a simply architectural view point it would look ridiculous. It will compromise the privacy of existing dwellings and the Church which is a protected structure.
- (ii) According to the Local Councilors at election time this development is for elderly tenants downsizing. Is a five story building the best option? Has any consideration been given to evacuation in the event of a fire or in response to an incident in the industrial estate which is just meters away?
- (iii) Again according to the Local Councilors a cycle lane is proposed for this side of the road which will lead to further loss of parking spaces. Are the Council aware that there are 8 masses a week, an average of 50 funerals a year (roughly one a week), Communion, Confirmations and Weddings? There are also daily meetings of clubs and societies at the Millennium Centre. Where are these people to park? These gatherings are all part of the fabric of our existing community, do we not have a say? People also use this area to meet for walks and cycles and parent collect children from the Croom and Pallaskenry school busses. Where are they to park? At present overflow from the church parking use the footpaths at entrance to the Forge, Castlegrange and the Holiday Home apartments to park. This poses a danger to people with mobility issues and buggies not to mention the potential for disaster if emergency vehicles need to access any of the above areas. This will become a bigger problem if parking spaces are removed. This area should be used as parking for the area when the cycle lane becomes a reality. The Council need to look at the bigger picture.
- (iv) The Ballycummin Road is already a very busy road and adding extra housing and their vehicles along with an extra entrance on to the road is hardly good planning. There are already 4 entrances onto this road in the space of 300meters.
- (v) There has been no public consultation with local residents. Do we not count? Strange how all the local Councilors found our doors during election time. The Council already owns land which is more suitable for this type of development.

Mayor's Response:

- (i) As there is an immediate adjacency between the development and St. Nessan's Church, the principles of sensitive approach to the protection of historical buildings has been applied with reference to the Limerick City and Council Development Plan 2022-2028 and Architectural Heritage Protection Guidelines for Planning Authorities (2011). It should be noted that the area is not an architectural conservation area, nor has it received any further designation beyond the protection of historical buildings.
- (ii) The building has been designed in accordance with the Second Schedule to the Building Regulations and on the basis of appropriate Universal Design Principles for use by residents with various abilities. A Fire Safety Certificate and Disability Access Certificate will be obtained in advance of construction. For the avoidance of doubt, in the context of Building Regulations and Fire Safety, a five storey building is not considered high rise.
- (iii) The capacity of the external road network has been assessed in accordance with TII guidelines in consultation with LCCC Transport Dept using industry-standard software. Junction capacities have been assessed for the proposed development with future projections up to the design year of 2041. Active travel linkages have likewise

been assessed. Findings are listed in the TTA. The cumulative impact of the development on the surrounding road network is found to be minimal.

- (iv) It is essential to remove 13no spaces to accommodate sight lines emerging from the development and particularly for emergency vehicles accessing the front of the proposed building, in accordance with Second Schedule to the Building Regulations, Technical Guidance Document B. The car spaces to this road are owned and operated by the Local Authority, and every possible liaison has been made with Roads and Active Travel Teams in advance of submitting this application.
- (v) The Part 8 process upholds a public publication and consultation period during which the public can make submissions relating to the application which will be considered by the Council.

SUB (19) Charlie & Liz Hanrahan**Submission Summary:**

- (i) As a home owner at 6 The Forge Raheen I have serious reservations about this planning application. The removal of 13 parking spaces will have serious consequences on the exit from the Forge The height of this building will ruin the aspect coming out of our estate We already have a no of apartments built in our area.

Mayor's Response

- (i) It is essential to remove 13no spaces to accommodate sight lines emerging from the development and particularly for emergency vehicles accessing the front of the proposed building, in accordance with Second Schedule to the Building Regulations, Technical Guidance Document B. The car spaces to this road are owned and operated by the Local Authority, and every possible liaison has been made with Roads and Active Travel Teams in advance of submitting this application.

SUB (20) Limerick Pedestrian Network

Submission Summary:

- (i) However, we have concerns regarding the design of the junction onto Ballycummin Road. Firstly, the turning radii at this junction appear inconsistent with the latest Design Manual for Urban Roads and Streets (DMURS) recommendations. The current design may allow vehicles to enter and exit at higher speeds, increasing risks for pedestrians. We recommend revisiting this aspect to reduce turning radii and incorporate appropriate vertical deflection to ensure pedestrian safety
- (ii) From the submitted drawings, it appears to feature a dished crossing that prioritizes vehicle movement over pedestrians. Given the low traffic volumes expected at this junction, a continuous footpath would be a more appropriate solution, in line with Advice Note 6 for DMURS. This guidance highlights that private entrances, such as those to apartment blocks, are ideal locations for continuous footpaths. Should a continuous footpath not be feasible, the minimum provision should be a raised crossing to ensure pedestrian priority, safety, and comfort.
- (iii) We also urge the consideration of a pedestrian access route from the development into Raheen Business Park. The site's proximity to the business park offers a significant opportunity to support sustainable commuting. Without direct access, residents face a circuitous walking route, which diminishes the practical connectivity between the two areas. This is part of a broader issue along Ballycummin Road, where filtered permeability measures have not been implemented, despite their clear benefits in locations such as the nearby mixed use development, An Dún. Creating a direct pedestrian connection would benefit not only residents of this development but also the wider community, facilitating easier access to employment opportunities and enhancing passive surveillance of the area.

Mayor's Response:

- (i) Turning radii proposed are derived from Swept Path Analyses carried out for large cars, refuse trucks, box vans and emergency vehicles, and constitute the minimum envelope required to accommodate all of these vehicles without oversailing of kerbs putting pedestrians at risk. This is demonstrated in drawings 11605-2006 and 11605-2007.
- (ii) The necessary radii of the entrance demands that the pedestrian crossing be set back from the line of the Ballycummin Road carriageway kerb towards the site to ensure the minimum crossing distance. At this location, the ramp inside the crossing table would clash with the ESB ground-mounted substation. In addition, DMURS recommends the STOP line at such a location be located before the crossing, placing it well within the site as to be impractical. Locating the STOP line the other side of the crossing would require vehicles to halt before they have fully descended the ramp, which in turn poses an obstacle to pedestrians and presents a rolling risk to these vehicles. In short, the necessary location of the pedestrian crossing is unsuitable for a continuous crossing. It is also pointed out that the road surface within this development is less a street than a parking area. It would be inappropriate to impose all the requirements of a conventional street junction to this entrance.
- (iii) The target demographic for residents does not coincide with the target patronage of the Business Park, albeit that there is no specific conflict between the two demographics. Thus, the desire-line for residents between the development and the Business Park is weak. The introduction of a pedestrian and cyclist link between the development and

the Business Park would amount to a thoroughfare for the general public through the development, which would be a concern for the intended residents. On the balance of value, it is felt that the priority of service should lie with the more vulnerable group, that of the residents in this case, to provide a sense of security over the convenience of the general public.

SUB (21) GAS NETWORKS IRELAND

Submission Summary:

GNI issued an information drawing and Code of Practice document:

GNI Safety Advice for working in the vicinity of Gas pipes 2021

GNI Code of Practice for Working in Vicinity of Tx Network

Mayor's Response:

The submissions are acknowledged. Per application documentation, there are no proposed installations or connections to the Gas Network as part of this development.

4.0 Habitats Directive Project Screening Assessment

An Appropriate Assessment Screening Report has been undertaken by Ash Ecology & Environmental Ltd for the proposed development. The screening examined the impacts the proposed development may have on any nearby European Designated Sites. The report concluded that the proposed development is not likely to have a significant effect on any European Site given the nature of the proposed works.

It is considered, given the nature and scale of the works and the nature of the existing surrounding urban environment, the development as proposed should not exercise a significant effect on the conservation status of any SAC or SPA either alone or in combination with other plans or projects and therefore a Stage 2 NIS is not necessary. In light of this assessment, it can be concluded that the proposed development aligns with relevant environmental protection objectives and does not pose a risk of adverse effects on designated conservation sites, reaffirming that a Stage 2 NIS is not warranted.

5.0 Environmental Impact Assessment Screening

An EIA Screening Report has been prepared by ASH Ecology & Environmental and submitted with the application which considered whether an EIA is required for the proposed development. The Screening report concludes that there is no real likelihood of significant effects of the environment having regard to the nature, scale and location of the proposed development. The characteristics and sensitivities of the site and receiving environment are not considered vulnerable to significant adverse effects from the project with the appropriate best practice standards and procedures being implemented throughout the project.

The proposed development is considered sub-threshold as per the screening report and does not fall within the mandatory requirements for an EIA as specified in Section 5 of the Planning and Development Regulations 2001 (as amended). Taking into account the size of the development and its location within a modified environment, it has been determined that the preparation of an Environmental Impact Assessment Report is not required.

6.0 Key Policy Provisions

Limerick Development Plan, 2022-2028:

The Development Plan sets out the following policies and objectives with respect to acceptable development at the location in question:

Policy HO P1 Implementation of the Housing Strategy, including the Housing Need Demands Assessment

It is a policy of the Council to facilitate the implementation and delivery of the Housing Strategy and Housing Need Demand Assessment (HNDA) 2022 – 2028, to meet the increasing projected population, changing household size and housing needs, including social and affordable housing requirements of Limerick over the lifetime of the Plan

Objective HO 01 Social Inclusion

It is an objective of the Council to ensure that new developments are socially inclusive and provide for a wide variety of housing types, sizes and tenure, in suitable locations, throughout Limerick, to cater for the demands established in the Housing Strategy and the Housing Need Demand Assessment.

Objective HO 02 Density of Residential Developments

It is an objective of the Council to:

- a) Promote, where appropriate, increased residential density in the exercise of its development management function and in accordance with Table 2.6 Density Assumptions per Settlement Hierarchy in Chapter 2: Core Strategy and the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities and the accompanying Urban Design Manual, DEHLG, May 2009.
- b) Encourage increased densities that contribute to the enhancement of a town or village by reinforcing street patterns or assisting in re-development of backlands and centrally located brownfield sites.

Policy CS P2 Compact Growth

It is a policy of the Council to support the compact growth of Limerick City Metropolitan Area, towns and villages by prioritising housing and employment development in locations within and contiguous to existing City and town footprints where it can be served by public transport and walking and cycling networks, to ensure that development proceeds sustainably and at an appropriate scale, density and sequence, in line with the Core Strategy Table 2.7.

Policy CGR P1 Compact Growth and Revitalisation

It is a policy of the Council to achieve sustainable intensification and consolidation, in accordance with the Core Strategy, through an emphasis on revitalisation and the delivery of more compact and consolidated growth, integrating land use and transport, with the use of higher densities and mixed-use developments at an appropriate scale on brownfield, infill, backland, state-lands and underutilised sites within the existing built footprint of Limerick's City, Towns and Villages.

Objective HO 05 Apartments

It is an objective of the Council to encourage an increase in the scale and extent of apartment development, particularly in proximity to core urban centres and other factors including existing public transport nodes, or locations where high frequency public transport can be provided, close to locations of employment and a range of urban amenities including parks/ waterfronts, shopping and other services.

Objective HO 03 Protection of Existing Residential Amenity

It is an objective of the Council to ensure a balance between the protection of existing residential amenities, the established character of the area and the need to provide for sustainable new development.

Objective CGR O2 Place-making, Universal Design and Public Realm

It is an objective of the Council to:

- a) Ensure that all developments are designed to the highest quality with respect to the principles of place making, universal design and public realm including the guidance

set out under the Urban Design Manual – A Best Practice Guide (2009) and the Design Manual for Urban Roads and Streets (2013) the Whole of Government National Disability Inclusion Strategy (NDIS) 2017-2022 and the 2020 DMURS Interim Advice Note – Covid 19 Pandemic Response.

Objective ECON O18 Specific Site Requirements

It is an objective of the Council to: b) Ensure the provision of a minimum 20m landscaped buffer zone between proposed development and adjoining development/lands in Annacotty Business Park, Northside Business Park and the ‘High Tech/ Manufacturing’ zoned lands to the west of Raheen Business Park.

Land Use Zoning – Existing Residential

The site is zoned Existing Residential the objective of which is to provide for residential development, protect and improve existing residential amenity.

Purpose: This zone is intended primarily for established housing areas. Existing residential amenity will be protected while allowing appropriate infill development. The quality of the zone will be enhanced with associated open space, community uses and where an acceptable standard of amenity can be maintained, a limited range of other uses that support the overall residential function of the area, such as schools, crèches, doctor’s surgeries, playing fields etc.

National Guidance:

- Draft National Planning Framework
- National Planning Framework – Ireland 2040
- Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities, 2024.
- 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
- Urban Development & Building Heights Guidelines for Planning Authorities, 2018
- 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
- Guidelines for Planning Authorities on Childcare Facilities , 2001
- Appropriate Assessment Guidelines for Planning Authorities
- Quality Housing for Sustainable Communities Guidelines (2007 as updated
- Development Management Guidelines for Planning Authorities

7.0 Appraisal

Principle of Development:

This Part 8 application is for 20 x apartments at Ballycummin Road, Raheen, on appropriately zoned lands under the ownership of Limerick City & County Council. LCCC seek to create sustainable communities and acknowledges that this requires the delivery of quality housing. In terms of site suitability, the site is zoned *Existing Residential* in the Limerick Development Plan, 2022-2028 with an objective to provide for residential development, protect and improve existing residential amenity. The provision of residential units on the site is therefore acceptable in principle.

Density:

The proposed density for the building with a configuration of 20 units over 5 floors on a relatively small site of 0.26 hectares, translates to a density of 76.92 units per hectare (uph). This proposal therefore aligns with the designated density for this area, as outlined in the Limerick Development Plan for 2022-2028, which is a minimum of +45uph, the presented height and density are deemed acceptable given the location which graduates from St. Nesson's Road and is in close proximity to existing three storey residential development, and commercial uses that are currently 2-4 storeys (Raheen Business Park, Caseys, City Park House, Courtfields Local Centre, South Court Hotel and the proposed Primary Healthcare Centre). The site is considered to be a reasonable distance from existing residential units at Willow Park and St. Nesson's Church and community centre on the corner of St. Nesson's and the Ballycummin Road. It should also be noted that this site is located in walking distance to a high frequently public transport service to the City Centre and the University of Limerick, employment zones such as University Hospital Limerick, the Raheen Business Park (Analog, Stryker, Regeneron, Eili Lilly (under construction)) and Mungret Public Park.

Higher density development aligns with the objectives of the Limerick Development Plan, 2022-2028 by supporting compact growth, which prioritises efficient land use, sustainable urban expansion, and enhanced liveability. This approach promotes the consolidation of development within existing urban areas, reducing urban sprawl and encouraging the use of public transportation, walking, and cycling. By concentrating housing in well-connected areas, high-density development fosters economic vitality, social inclusion, and environmental sustainability, all of which are core goals of Limerick's strategy for long-term, balanced urban growth. Therefore, the proposed density proposed is considered appropriate at this location.

Design & Layout:

The proposed development will involve the construction of a 5 storey building (consisting of a 3-5 storey three blocks) on a 0.26 hectare site. The proposed development comprises of two linked residential blocks. The development will provide 20 apartments (comprising 2 x no 5-bed ground floor community units, 1 x no 1-bed ground floor unit, 9 x no 2-bed units, 8 x no 2-bed Universal Design units and 1 x no community room (32m²). Provision of car and cycle parking spaces and refuse storage accessible via building cores as well as dedicated plant/storage rooms. The units are broken down as follows:

Unit A – Community Dwelling (West) – 242.2m² - 1 x Unit
Unit B - Community Dwelling (East) – 247m² - 1 x Unit
Unit C – 1 Bed Apt – 45m² - 1 x Unit
Unit D - 2 Bed Apt (West) – 73m² - 6 x Units
Unit E – 2 Bed Apt (Corner) - 3 x Units
Unit F - 2 Bed Apt (East) – 73m² - 8 x Units

The building will include a Community Room (32m²) and adjacent external communal open space area (a total of 269m² communal space) featuring benches for outdoor amenity. This area is welcomed and considered essential in order to foster a sense of community within the development where people can meet and socialise.

Materials & Finishes:

The material palette includes textured render, both smooth and roughcast, splitface masonry block in both natural and buff finish, precast concrete banding elements, masonry and flat roof canopies, galvanised metalwork to deck and balcony edge and aluminium window and door systems.

Compliance with the Design Standards for New Apartments (2022):

It is necessary to consider the detailed design of the proposed apartment blocks having regard to the requirements of both local planning policy and the ‘Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities, 2022’. In this respect, it is of particular relevance to note that where specific planning policy requirements are stated in the Guidelines, these are to take precedence over any conflicting policies or objectives contained in the development plan. Therefore, in accordance with Section 3.0 of the Guidelines the subject scheme is appraised with regard to compliance with the relevant planning policy requirements set out in the Guidelines in relation to the following:

Apartment mix within apartment schemes - The proposed development provides for the construction of 20 No x units (2 x No. five-bedroom community units, 1 No. x one bedroom ground floor unit, 9 x No. two bedroom units and 8 x No. two bedroom universal design units). In this respect, the proposal achieves a suitable mix of unit sizes/types in accordance with Specific Planning Policy Requirement No. 2 of the Guidelines.

Apartment floor areas –The Guidelines state in relation to social housing or purpose-built housing for older people it is considered necessary that these Guidelines would also make provision for a two-bedroom apartment to accommodate 3 persons. This is in line with the Quality Housing for Sustainable Communities Guidance (2007), for social housing schemes. 17 No. x two bedrooms units, 1 No. 1 x bed and 2 x No. Community Dwellings which have 4 bedrooms are proposed for this scheme which is in line with the guidance. It is considered that each of the proposed apartment units have a stated floor area which exceeds the minimum requirements of the Guidelines while also going above those set out in Table DM 4 of the Limerick Development Plan. Furthermore, in the interest of safeguarding higher standards of accommodation by ensuring that apartment schemes do not provide for units being built down to a minimum standard (in reference to Section 3.8 of the Guidelines which states that the majority of all apartments in any proposed scheme of 10 or more apartments should exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3

bedroom unit types by a minimum of 10%). It is considered that each of the proposed apartment units have a stated floor area which exceeds the minimum requirements of the Guidelines. The development as proposed accords with this requirement.

Dual aspect ratios - The amount of sunlight reaching an apartment significantly affects the amenity of its occupants. The Guidelines note that *for building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.* And therefore it is a specific planning policy requirement that in suburban or intermediate locations the minimum number of dual aspect apartments to be provided in any single apartment scheme will be 33%. The 20 apartments meet the dual aspects requirements – 100% compliance.

Floor to ceiling height – The suggested minimum floor to ceiling height, consistent with good room design, the use of standard materials and good building practice is generally 2.4m. In relation to ground floors, it is a policy requirement that ground level apartment floor to ceiling heights shall be a minimum of 2.7m and applicants and their designers should consider 3.0 metres on the ground floor of multi-storey buildings. The floor areas of all floors range from between 2.4m to 5m at ground and first floor level. This is considered acceptable.

Apartments to stair/lift core ratios – The number of lift and stair cores is principally governed by the dual aspect ratios specified in these guidelines, balancing the financial cost of providing and maintaining lift and stair cores with appropriate building circulation and compliance with building regulations, particularly in relation to fire safety. The proposal includes for two centrally located lifts which complies with the requirement.

Storage spaces – The schedule of accommodation demonstrates that these comply with the minimum space requirements set out in appendix 1 of the guidelines.

Amenity space - Appendix 1 of the Apartment Guidelines indicate a minimum of 5m² for 1 bed apartments. As set out in the Housing Quality Assessment and floor plan drawing, all apartments meet and go above the required minimum standard. It should be noted that the units also have the added communal ground floor units with a floor area of 32m² and outdoor area at ground floor that will contribute to positive community creation and a healthy living environment within this development and are welcomed by the Planning Authority.

Aggregate floor areas/dimensions for certain rooms – As per the drawings submitted the apartments proposed meet the required aggregate floor areas for kitchen/living/dining room and bedrooms. Having regard to the above, it is considered that the proposed development complies with the relevant Section 28 Guidelines and with the policies and objectives of the Limerick Development Plan and any issues raised by way of third party objector have been addressed.

Compliance with Quality Housing for Sustainable Communities:

4 bedroom (7 x persons) apartments are required to have a target floor area of 105m². The area proposed for Apartment Type A (Community Dwelling with 4 x bedrooms) is 242.2m² which exceeds the requirement.

2 bedroom (4 x persons) apartments are required to have a target floor area of 73m². The area proposed for Apartment Type's D, E & F (with 2 x bedrooms) is 79.9m², 78.1m² and 84.8m² which exceeds the requirement.

1 bedroom (2 x persons) apartments are required to have a target floor area of 45m². The area proposed for Apartment Type C (with 1 x bedroom) is 56.2m² which exceeds the requirement.

Having reviewed the information set out in the Housing Design Statement, it is considered that the proposed development complies with the relevant Section 28 Guidelines and with the policies and objectives of the Limerick Development Plan with regard to units sizes.

Residential Amenity:

The most vulnerable receptors in the receiving environment are considered to be the dwellings at The Forge, the Community Centre, and St. Nessian's Church. In this context, a Social Housing Architectural Design Statement and a Daylight/Sunlight Analysis have been prepared and submitted as part of the application. The Daylight/Sunlight Analysis demonstrates that the proposed development does not have a significant impact on the residential properties to the north or east. It shows minimal to no additional shadowing of any dwellings or amenity spaces. The areas affected by shadowing from the proposed building are primarily public pathways, IDA lands, and the northern section of the site within the development boundary. This analysis aligns with the recommendations of the *BRE Guide: Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice (2022)*. Additionally, the study confirms that the central communal amenity space within the development receives sufficient sunlight throughout the year, making it both functional and enjoyable.

The height of the building at the highest point is 15m. Taking into account the existing height of the adjacent structures and the distance of same from the proposed development, the height is not considered overbearing in nature and will not lead to issues such as overlooking or overshadowing. An Overshadowing Analysis was prepared and submitted as part of this proposal. The analysis demonstrates that the proposed development has no material impact on the residential properties located to the north and east. It confirms minimal to no additional shadowing on existing dwellings or associated amenity spaces.

Shading caused by the building predominantly will affect public pathways, IDA lands, and areas within the development's northern boundary. The analysis aligns with the standards set out in the *BRE Guide: Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice (2022)*. Additionally, the study confirms that the central communal amenity space within the development enjoys sufficient sunlight year-round, ensuring it remains both functional and enjoyable for residents.

The proposed development maintains a separation distance of 15m from St. Nessian's Church to the west and exceeds 22m from all adjacent residential buildings in other directions, including the gable end of No. 1 The Forge. Furthermore, the development is situated 37m from the Analog building within Raheen Business Park, which meets the separation requirements outlined in Policy ECON 018 set out in the Limerick Development Plan, 2022-2028.

Having reviewed the comprehensive assessments submitted as part of this planning application, and in light of the site context within a built-up suburban area, including its relationship with neighbouring properties, it is considered that the overall scale, design, positioning and orientation of the proposed development, will not give rise to any significant detrimental impact on the residential amenity of neighbouring properties by reason of overlooking or an unacceptable overbearing visual appearance. It is considered that the proposed development complies with the relevant Section 28 Guidelines and with the policies and objectives of the Limerick Development Plan and any issues raised by way of third-party submissions have been addressed.

Access & Parking:

Access to the site will be provided directly from the Ballycummin Road onto the site for vehicles via a vehicle access point. Pedestrians can access the site from the public footpath directly into the centre core of the building. The creation of the access point from the Ballycummin Road will lead to the loss of thirteen car parking spaces currently located along the public road. This element of the proposal has been raised in a number of submissions on this application citing the loss of the spaces as problematic for users St. Nessian's Church and the Millennium Community Centre. Given the level of street car parking along Ballycummin Road that will be retained despite the removal of the thirteen spaces and the site's location within walking distance of bus stops that serve a high frequency bus corridor to the City Centre and the University of Limerick the proposal for the removal of the on street spaces in order to facilitate the creation of housing is considered acceptable and in line with the Limerick Development Plans policies and objectives to promote a modal shift towards more healthier and active modes of transport. Additional car parking will be provided on site, fifteen spaces including two mobility friendly space for residents and employees. EV vehicle charging points are included as part of the infrastructure as part of the proposed development. It is considered that the proposed development complies with the policies and objectives of the Limerick Development Plan and any issues raised by way of third party objector have been addressed.

Bin Storage:

A secure external bin storage area is proposed for future residents access only and located close to the rear of the site.

Bike Parking:

30 no. bike parking spaces are proposed to the rear of the site in a weather proofed, secure flat roofed structure. As set out in Table DM 9(a) 1 bike space per dwelling (3bed or less) is required and 1 space per 2 units for visitors. For 1-2 bed apartments, 1 space is required and 1 space per 2 units. This equates to 20 parking spaces. The proposal for 30 bike spaces is therefore acceptable.

Car Parking:

15 no. car parking spaces are proposed on site. Two spaces are mobility friendly. As set out in Table DM 9(a) 0.5 spaces per unit (10 spaces) and 1 space per 6 units for visitor/short term (4 spaces) is required for a sheltered housing development. This equates to 14 parking spaces. The proposal for 15 bike spaces is therefore considered acceptable. EV detail charging detail has not been submitted as part of the application.

Boundary Detail:

The rear boundary and eastern boundary will consist of a 2.15m high block concrete wall rendered and painted. The western boundary will consist of a post and fence panel with concrete panel plinth. A mix of soft screening separate private open space from within the development while low and galvanised metal ensure the enclosure of private spaces.

Private Amenity Space:

In terms of private amenity space all units have private balcony areas. First Floor - Apartment 103, 203 & 303 (Type E) has a balcony area of 8.9m², Apartments 104, 105, 204 & 205 (Type D) have a balcony area of 7m², Apartment 106 & 206 (Type D) has a balcony area of 8.6m² and Apartment 101, 102, 201, 301, 302, 401 and 402 (Type F) has a balcony area of 9.1m². Apartment 301 (Type E) has a balcony area of 9.9m². Apartment 002 (Type C) has a garden area of 7.6m². Community Dwelling West 003 (Type A) has a garden area of 27.7m² and Community Dwelling East 001 (Type C) has a deck area of 12.6m² and a private garden with an area of 32.4m². All units have access to the community room and external community amenity area. The sizes of the private amenity space are in line with the Apartment Guidelines and The Quality Housing for Sustainable Communities Guidelines.

Public Lighting:

The proposed lighting design shall be in line with Limerick City and County Council's Public Lighting Specification. The Climate Sustainability Statement submitted states that in accordance with Section 6.3.13 of the Limerick Development Plan, 2022-2028, the external lighting design for the development will prioritise minimising light emissions during night time. The design will specifically address the prevention of unnecessary light spillage to mitigate any potential adverse effects on local wildlife, ensuring a balance between functional lighting and environmental protection.

Flood Risk:

The site is not located in an identified flood zone.

Surface Water Disposal:

The proposed storm water drainage system is designed to manage surface water runoff from all impermeable surfaces within the development, including roadways, roofs, and hardstanding areas. The permeable paved parking areas within the development have also been treated as impermeable in the storm water network design to accommodate exceedance conditions. Bypass separators are proposed for installation before discharging into the soakaway system. This measure addresses potential hydrocarbon contamination from roadway and parking area runoff. The separators are appropriately sized to handle the impermeable areas they serve, ensuring effective treatment. Once treated, the storm water will infiltrate into the ground.

Surface water from hard surfaces including roadways and roofs will flow by gravity to a soak away unit located on site. All storm water regenerated on site will discharge from the storm water sewer network via an oil/petrol interceptor to the soak away unit situated within the site. The oil/petrol interceptors and a silt trap at the inlet at the soakaway unit will serve to prevent hydrocarbons and debris entering the tank.

The existing site is primarily a greenfield with no existing drainage or SUDS measures in place. In order to retain the current surface water run off rate the development has been designed in accordance with the principles of Sustainable Urban Drainage Systems (SuDs). Interception and attenuation storage will be achieved by implementing infiltration/attenuation storage tanks. Growth factors are proposed to allow discharge for a 100 year event. All SuDS measures will be designed in accordance with the recommendation set out in the EPA's document entitled 'Guidance on Authorisation of Discharges to Groundwater 2011'. The proposed SuDS measures include a combination of water butts, rain gardens, tree pits, detention swales, permeable paving, and drainage kerbs with infiltration trenches. These features are designed to provide interception storage. It is noted that attenuation storage has been calculated and incorporated as if no interception storage were available. This approach ensures that the system's performance is not affected by the seasonal variability of interception storage measures. It is considered that the proposed development complies with the policies and objectives of the Limerick Development Plan and any issues raised by way of third party objector have been addressed.

Invasive species:

An Invasive Species Management Plan shall be included in the draft CEMP with best practice protocol to prevent the introduction of invasive species. The final CEMP will be developed by the contractor to incorporate the relevant best practice procedures to be adhered to throughout the construction works.

Noise:

The site is in close proximity to the Analog Devices International facility in Raheen Business Park. The LCCC Noise Mapping for Industry has identified that noise emissions from the Analog facility can reach levels of up to 75dB. It is stated, in the application, that a detailed Noise Impact Assessment will be conducted at the design stage to ensure that building components are specified to mitigate industrial noise effectively, in compliance with the standards outlined in BS 4142: Methods for Rating and Assessing Industrial and Commercial Sound. It is acknowledged that this approach will help reduce the potential any negative impact of any existing building/process on the new scheme.

Architecture/Archaeology:

The site is not within the vicinity of a recorded monument or an architectural conservation area. The site is in close proximity to St. Nessian's Church which is a protected structure along the western boundary. Through careful siting, design and material choice, the formation of a new and modern streetscape is welcomed and it can be concluded that the development will only serve to enhance the setting of the protected structure, contributing to the overall character of the area as a whole and not detract from same.

Climate Sustainability Statement:

The submitted statement outlines several strategies to enhance sustainability within the mechanical and electrical systems of the development. These include renewable energy integration, energy-efficient lighting, water efficiency, net-zero energy potential, smart grid integration, and the electrification of heating systems. These measures collectively aim to reduce environmental impact, improve energy performance, and align with sustainable development principles set out in the Limerick Development Plan, 2022-2028. It is acknowledged that this approach will help contribute to reducing the environmental footprint of the project.

Services:

Site is to be connected to the Uisce Eireann water and wastewater infrastructure. A pre-connection enquiry has been submitted, and a connection of feasibility has been received which notes that a connection to both is feasible without infrastructure upgrade by Uisce Eireann. The capacity of the pumping station has been calculated based on the wastewater demand of 20 residential units.

Construction Environmental Management Plan (CEMP):

A detailed Construction Environmental Management Plan (CEMP) to include a traffic management plan, which will take account of the site location, access issues, hydrocarbons, earth works, run-offs and location of services, will be prepared before any development is carried out and will include input from the design team, all specialist consultants and Limerick City & County Council.

Conclusion:

In conclusion, the proposed development aligns with the zoning objectives of the Limerick Development Plan, 2022-2028 and supports the city's vision for compact growth. By making efficient use of urban land within a well-connected area, the development promotes sustainable, high-density housing, helping to reduce urban sprawl and encourage the use of public transport. The introduction of a modern apartment development which provides adaptable living spaces will serve to meet the evolving needs of the local community. The project also complements Limerick's broader objectives of creating vibrant, liveable neighbourhoods while addressing housing needs in a manner consistent with the city's long-term growth strategy. The proposal as set out is considered to be in compliance with Objective HO O1 Social Inclusion, Objective HO O2 Density of Residential Developments, Objective HO O5 Apartments and Objective HO O3 Protection of Existing Residential Amenity in the Limerick Development Plan, 2022-2028.

8.0 Modifications

Having regard to the submissions received, 1 Number Modification is set out below:

8.1 Modification 1 – Reduction in Building Height.

Having regard to feedback received from councillors regarding the height of the development the following modification was made:

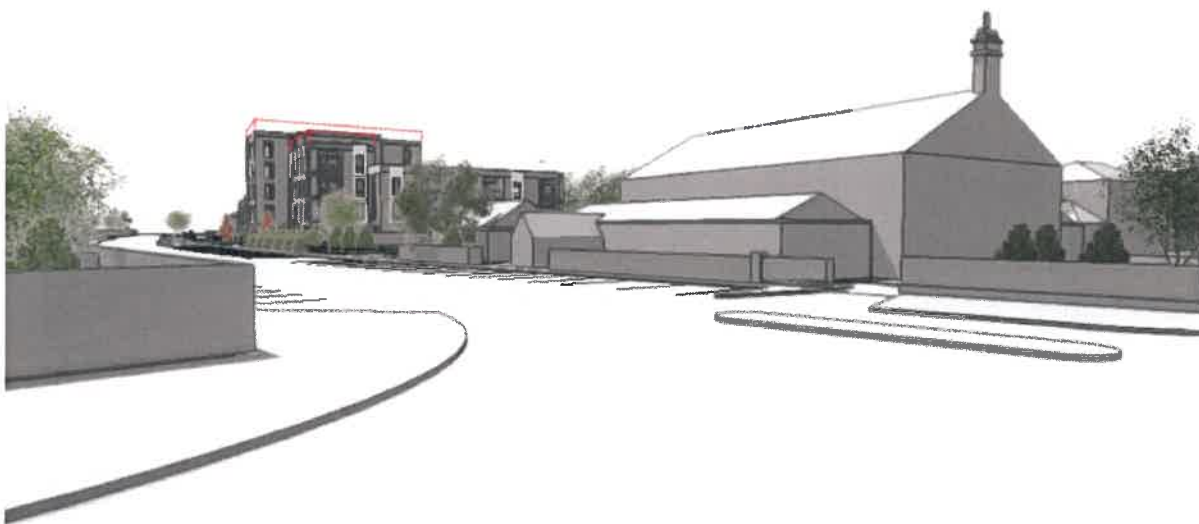
Modifications to the development as submitted consist of a 1.6 m reduction in height to the 4 and 5 storey elements of the building. These reductions were achieved by

reducing the floor-to-floor height of each floor and reducing the parapet height. The location of the PV panels has been replaced to the roof of the 3 storey element with access to be provided by external ladder.



Plate 2 ***Modification 1 – Reduction in Height of Building – View from Ballycummin Road***





9.0 Habitats Directive Project Screening Assessment of the Modification Proposed

The screening statement has been updated to include the modification proposed. It is considered that the development as proposed should not exercise a significant effect on the conservation status of any SAC or SPA either alone or in combination with other plans or projects and therefore a Stage 2 NIS is not necessary.


9.1 Environmental Impact Assessment Screening of the Modification Proposed

The EIAR screening report has been updated to include the modifications proposed. Having reviewed the EIAR screening report and considered other additional information submitted, it is considered that the proposal as outlined does not require a sub threshold Environmental Impact Assessment Report.

10.0 Conclusion

Having regard to the foregoing evaluation and the reasons and considerations as set out, the proposal is considered to be in accordance with the objectives of the Limerick Development Plan, 2022 - 2028 and the proper planning and sustainable development of the area. Pursuant to Section 179(3)(a) of the Planning and Development Act 2000 (as amended) the proposed

development is recommended to proceed as modified in the report to the Elected Members of Limerick City & County Council.



Mr. John Moran

Mayor

Limerick City & County Council

Date: 16th January 2025 PO,

APPENDIX 1 INTERNAL SECTION COMMENTS

ROADS SECTION

SUB Department LCCC Roads

1. Roads

- a) A Stage 2 Road Safety Audit should be undertaken in compliance with the TII Publication 'Road Safety Audit GE-STY-01024'.
- b) A Stage 3 Road Safety Audit should be undertaken in compliance with the TII Publication 'Road Safety Audit GE-STY-01024'.
- c) The public EV chargers/charging spaces should be provided in accordance with the Department of Transport Guidelines - Draft Universal Design Guidelines for Electric Vehicle Charging Infrastructure to be included at the detail design stage.
- d) Footpaths for the proposed development should be in line with "TII Specification for Road Works Series 1100 – Kerbs, Footways and Paved Areas" to be included at the detail design stage. The dishing of footpaths should be constructed in accordance with the "Guidance on the use of Tactile Paving Surfaces Document".
- e) The road construction should be in accordance with the "TII Publications Specification for Road Works Series 700 – Road Pavements & Specification for Road Works Series 900 Road Pavement-Bituminous.

2. Servicing

- (a) All service cables associated with the proposed development including electrical, communal television, telephone and street lighting cables should be laid underground within the site.

3. Public Lighting Arrangements

- (a) Public Lighting and its infrastructure should be in line with Limerick City and County Council's Public Lighting Specification.

4. Surface Water & SuDs Management

- (a) The construction of the Surface Water & SuDs systems, should be in line with Limerick City and County Council's Surface Water/SuDs Specification.
- (b) All surface water run-off from the development should be disposed of appropriately. No such surface water should discharge onto adjoining properties or onto the public road.
- (c) All surface water run-off from the public road, which flows into the site, should continue to be accommodated within the site.
- (d) A Construction Management and Delivery Plan for the construction of the development should be undertaken.

ACTIVE TRAVEL SECTION

The Active Travel Section are preparing a preliminary design for an active scheme in the vicinity of the proposed development. It is requested that the Housing section liaise with Active Travel during the detailed design stage regarding the entrance detail. The location of the development is highly accessible, the provision of secure bike storage is welcomed for residents

and visitors alike, the provision of 30 bike spaces is in compliance with the standards set out in Table DM 9 (a) of the Limerick Development Plan.

It is requested that at detailed design stage the bike shed shall provide 20 secure and covered bike spaces accessible via a key /fob for residents. The size of the shed shall be sufficient size to ensure adequate spacing in line with the Cycle Design Manual 2023. The remaining 10 spaces will provide adequate bike parking for visitors in the form of Sheffield stands as per the 3D images.

TRAVEL & TRANSPORT SECTION

From an EV Strategy perspective we welcome and support the delivery of electric vehicle charging point infrastructure as part of the proposed development.

There is no objection to the principle of this application, subject to the development being delivered in accordance with the Department of Transport Guidelines - Universal Design Guidelines for Electric Vehicle Charging Infrastructure.

The parking layout should be revised to comply with the minimum EV parking bay dimensions. This revision is required to ensure universal access for all users and ensure that there is sufficient space for a person who is a wheelchair user to manoeuvre and gain access to the charging equipment and to the vehicle connection point.

ECOLOGY SECTION

An AA screening and EIA screening were attached to and reviewed as part of this proposal. The findings of the screening reports are acceptable.

There are what are assumed to be typographical errors within the documents for instance, the EIA screening contains a reference to the Newcastle West LAP 2014-2024 with regards to an Architectural Conservation Area.

In order to rule out the potential impact of this proposal on FPO species such as meadow barely *Hordeum secalinum* a botanical survey should be conducted prior to construction.

ENVIRONMENT SECTION (WASTE MANAGEMENT)

Prior to initiating any works at this development, the site developer or appointed contractor shall submit to Planning, Environment and Place-Making for agreement in writing a site specific waste management plan for the recovery/disposal of all wastes that will arise from the site clearance, demolition, refurbishment and/or construction related activities of this development. The waste management plan shall include:

- a) A list of proposed authorised waste collection permit holders to be employed.
- b) A list of the proposed waste facility permitted sites at which the wastes may be recovered or disposed of.

- c) Estimates of the proposed tonnages of construction and demolition (C&D) wastes by type e.g. soil and stone, rubble, wood, metal and plastic.

CONCLUSION:

The comments set out in the comments provided by internal sections in Appendix 1 will be taken into account in the design/delivery of the proposal by the Housing Section and best practice standards will be adhered to throughout.

Limerick City & County Council

Re: Part 8 Proposal for the following:

Development at Ballycummin Road, Limerick, is for the construction of a three to five storey building to include 20 no. residential units (2 no. 5-bed ground floor community units; 1no 1-bed ground floor unit; 9 no. 2-bed units and 8 no. 2-bed Universal Design units) to be accessed by a single stair and lift core; 1no community room (32sqm) at ground floor and all ancillary spaces. The site works consist provision of the removal of 13 no. public car spaces to Ballycummin Road, provision of a new vehicular entrance, 15 no. new car spaces, a new covered bin store, 30 no. bike spaces, connection to existing water main and foul sewer and the provision of an underground attenuation tank. The development includes the provision of planting and associated landscape works.

Appropriate Assessment (AA) Screening Determination

Pursuant to the requirements of the above Limerick City & County Council is proposing at Ballycummin Road, Limerick, the construction of a three to five storey building to include 20 no. residential units (2 no. 5-bed ground floor community units; 1no 1-bed ground floor unit; 9 no. 2-bed units and 8 no. 2-bed Universal Design units) to be accessed by a single stair and lift core; 1no community room (32sqm) at ground floor and all ancillary spaces. The site works consist provision of the removal of 13 no. public car spaces to Ballycummin Road, provision of a new vehicular entrance, 15 no. new car spaces, a new covered bin store, 30 no. bike spaces, connection to existing water main and foul sewer and the provision of an underground attenuation tank. The development includes the provision of planting and associated landscape works.

The plans and particulars for the proposed development were placed on public display from 14th of October to the 12th of November 2024 in accordance with the requirements of the Part XI of the Planning and Development Act, 2000 (as amended) and Part 8 of the Planning and Development Regulations, 2001 (as amended).

Having regard to Article 6 of the Habitats Directive 92/43/EEC and (inter alia) the Department of Housing Planning Community and Local Government's Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities (2010), screening of the development for Appropriate Assessment was carried out by ASH Ecology & Environmental.

An AA of the proposed development is not required as it can be excluded, on the basis of objective information provided in the Screening report, the scale of the development and the size of the site, that the proposed development, individually or in combination with other plans or projects, will not have a significant effect on any European sites. Therefore, this proposed project does not need to proceed to Stage II of the Appropriate Assessment Process. The Screening has determined that there is no potential for likely significant effects on any European sites.

For the reasons outlined above it is considered that the application for consent for the proposed development does not require an Appropriate Assessment or the preparation of a Natura Impact Statement (NIS).

Order: That Limerick City & County Council as the Competent Authority having considered the AA Screening Report prepared by ASH Ecology & Environmental makes a determination that, when considered either alone or in combination with other plans or projects, a Stage 2 Appropriate Assessment will not be required to accompany the proposal for the development of 20 residential units at Ballycummin Road, Limerick.



Mr. John Moran

Mayor

Limerick City & County Council

Date: 16 January 2025

PD.

Limerick City & County Council

Re: Part 8 Proposal for the following:

Development at Ballycummin Road, Limerick, is for the construction of a three to five storey building to include 20 no. residential units (2 no. 5-bed ground floor community units; 1no 1-bed ground floor unit; 9 no. 2-bed units and 8 no. 2-bed Universal Design units) to be accessed by a single stair and lift core; 1no community room (32sqm) at ground floor and all ancillary spaces. The site works consist provision of the removal of 13 no. public car spaces to Ballycurnmin Road, provision of a new vehicular entrance, 15 no. new car spaces, a new covered bin store, 30 no. bike spaces, connection to existing water main and foul sewer and the provision of an underground attenuation tank. The development includes the provision of planting and associated landscape works.

Environmental Impact Assessment (EIA) Screening Determination

Pursuant to the requirements of the above Limerick City & County Council is proposing at Ballycummin Road, Limerick, the construction of a three to five storey building to include 20 no. residential units (2 no. 5-bed ground floor community units; 1no 1-bed ground floor unit; 9 no. 2-bed units and 8 no. 2-bed Universal Design units) to be accessed by a single stair and lift core; 1no community room (32sqm) at ground floor and all ancillary spaces. The site works consist provision of the removal of 13 no. public car spaces to Ballycurnmin Road, provision of a new vehicular entrance, 15 no. new car spaces, a new covered bin store, 30 no. bike spaces, connection to existing water main and foul sewer and the provision of an underground attenuation tank. The development includes the provision of planting and associated landscape works.

The plans and particulars for the proposed development were placed on public display from 14th of October to the 12th of November 2024 in accordance with the requirements of the Part XI of the Planning and Development Act, 2000 (as amended) and Part 8 of the Planning and Development Regulations, 2001 (as amended).

Having regard to EIA Directive 2011/92/EU as amended by Directive 2014/52/EU (the EIA Directive), the guidance contained in the Department of Housing Planning Community and Local Government's "Impact Assessment Guidance for Consent Authorities regarding Sub-Threshold Development" (2003), Screening of the development for Environmental Impact was carried out by ASH Ecology & Environmental.


The Screening has been carried out in accordance with the EIA Directive and to Annex I, II and III of that Directive, which sets out requirements for mandatory and sub-threshold EIA. The proposal has been assessed in accordance with the criteria for sub-threshold development to determine the potential impact on the environment of the project.

The subsequent EIA Screening Report concludes that the development has been assessed under the environmental criteria outlined in Schedule 5 of the Planning and Development Regulations 2001, as amended, and an EIAR is not required. In conclusion, it is considered that the proposed development will not have any significant impacts on the environment given the scale of development and the size of the site. All recommended mitigation measures and standard

practices will be employed throughout the construction phase of the development to ensure that the proposed development will not create any significant impacts on the quality of the surrounding environment.

For the reasons outlined above it is considered that the proposal will not present a risk to the environment. As such this screening exercise concludes that an Environmental Impact Assessment is not required for this project.

Order: That Limerick City & County Council as the Competent Authority having considered the EIA Screening Report prepared by ASH Ecology & Environmental for Limerick City & County Council, makes a determination that an Environmental Impact Assessment will not be required to inform the construction of 20 residential units at Ballycummin Road, Limerick.



Mr. John Moran

Mayor

Limerick City & County Council

Date: 16 January 2025 *MD*