

Memo

To: John Moran, Mayor.

From: Nuala O'Connell. Senior Planner, Development Management

Date: 02/04/2026

Re: Part 8 proposal, Reference PT8LL327– The development will consist of: a) the construction of a 3-5 storey building, to include 30 no. apartment units (9 no. studio units, 7 no. 1 bedroom units, 10 no. 2 bedroom units, and 4 no. 3 bedroom units), comprised of 2 no. blocks of development (1 no. 3-5 storey block addressing Mary Street and 1 no. 4-5 storey block addressing Sráid Séamus Ó'Cinneide), to be accessed by a single and central stair and lift core, and including ancillary spaces such as secure storage for 42 no. resident bicycle parking spaces, communal refuse storage area, and resident storage room. b) Site and external works to consist of the removal of existing palisade perimeter fencing, to be replaced with the proposed new building and associated landscaping and public realm improvements, the provision of a new secure resident communal open space on Sráid Séamus Ó'Cinneide, 2 no. car parking spaces for Pigeon Club use accessed from Sráid Séamus Ó'Cinneide, improvement of public realm areas to both Mary Street and Sráid Seamus Ó'Cinneide including the replacement of footpaths, and the provision of 18 no. new visitor bicycle parking spaces on Mary Street, provision of side access to the proposed new building via new pedestrian only lanes accessed from both Mary Street and Sráid Séamus Ó'Cinneide, new public lighting, connection to the existing foul and surface water network, and all other associated site development and landscaping works. c) proposed development to include archaeological excavation works in relation to existing in-situ walls (Sites & Monuments Record LI005-0017148). In accordance with Article 120(1)(b)(i) of the Planning and Development Regulations 2001, as amended, the Local Authority has carried out a screening for environmental impact assessment of the proposal. Having regard to the information specified under Schedule 7A of the Planning and Development Regulations 2001, as amended, and based on an examination of the nature, size and location of the development, it is determined that there is no likelihood of significant effects on the environment arising from the proposed development. Nonetheless, a person may, within 4 weeks beginning on the date of the publication of this notice, apply to An Coimisiún Pleanála, 64, Marlborough Street, Dublin 1, D01 902. Limerick City and County Council has carried out an Appropriate Assessment (AA) Screening Report and it has been determined that a full Appropriate Assessment is not required in respect of this proposed development.

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 development of 30 apartments and associated site works at 48-50 Mary Street, Limerick.

The proposal prepared by the LA Housing Construction & Maintenance Directorate Section 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.

**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:

The development will consist of: a) the construction of a 3-5 storey building, to include 30 no. apartment units (9 co. studio units, 7 no. 1 bedroom units, 10 no. 2 bedroom units, and 4 no. 3 bedroom units), comprised of 2 no. blocks of development (1 no. 3-5 storey block addressing Mary Street and 1 no. 4-5 storey block addressing Sráid Séamus Ó'Cinneide), to be accessed by a single and central stair and lift core, and including ancillary spaces such as secure storage for 42 no. resident bicycle parking spaces, communal refuse storage area, and resident storage room. b) Site and external works to consist of the removal of existing palisade perimeter fencing, to be replaced with the proposed new building and associated landscaping and public realm improvements, the provision of a new secure resident communal open space on Sráid Séamus Ó'Cinneide, 2 no. car parking spaces for Pigeon Club use accessed from Sráid Séamus Ó'Cinneide, improvement of public realm areas to both Mary Street and Sráid Seamus Ó'Cinneide including the replacement of footpaths, and the provision of 18 no. new visitor bicycle parking spaces on Mary Street, provision of side access to the proposed new building via new pedestrian only lanes accessed from both Mary Street and Sráid Séamus Ó'Cinneide, new public lighting, connection to the existing foul and surface water network, and all other associated site development and landscaping works. c) proposed development to include archaeological excavation works in relation to existing in-situ walls (Sites & Monuments Record LI005-0017148). In accordance with Article 120(1)(b)(i) of the Planning and Development Regulations 2001, as amended, the Local Authority has carried out a screening for environmental impact assessment of the proposal. Having regard to the information specified under Schedule 7A of the Planning and Development Regulations 2001, as amended, and based on an examination of the nature, size and location of the development, it is determined that there is no likelihood of significant effects on the environment arising from the proposed development. Nonetheless, a person may, within 4 weeks beginning on the date of the publication of this notice, apply to An Coimisiún Pleanála, 64, Marlborough Street, Dublin 1, D01 902. Limerick City and County Council has carried out an Appropriate Assessment (AA) Screening Report and it has been determined that a full Appropriate Assessment is not required in respect of this proposed development.

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 proposed development comprises the construction of a 3–5 storey building accommodating 30 no. apartment units, broken down as follows:

- 9 no. studio units
- 7 no. one-bedroom units
- 10 no. two-bedroom units
- 4 no. three-bedroom units

The development consists of 2 no. blocks: a 3–5 storey block addressing Mary Street and a 4–5 storey block addressing Sráid Séamus Ó’Cinneide. Both blocks are to be served by a single, centrally located stair and lift core.

The proposal also includes:

- secure storage for 42 no. resident bicycle parking spaces
- a communal refuse storage area
- a resident storage room

Site and external works include the removal of the existing palisade perimeter fencing, to be replaced with the proposed new building, associated landscaping, and public realm improvements.

The development further provides for:

- a new secure communal open space for residents on Sráid Séamus Ó’Cinneide
- 2 no. car parking spaces for Pigeon Club use, accessed from Sráid Séamus Ó’Cinneide
- public realm enhancements to both Mary Street and Sráid Séamus Ó’Cinneide, including replacement of footpaths
- 18 no. new visitor bicycle parking spaces on Mary Street
- new pedestrian-only access lanes from Mary Street and Sráid Séamus Ó’Cinneide to the proposed building
- new public lighting
- connection to existing foul and surface water networks
- all ancillary site development and landscaping works

The proposed development will also include archaeological excavation works relating to existing in-situ walls (Sites & Monuments Record LI005-0017148).

The application site consists of a city centre infill / brownfield plot measuring 0.17ha in size with Mary Street located to the west and Sráid Séamus Ó’Cinneide located to the east. The application site is located on the southern part of King’s Island and is bordered to the north by St. Mary’s Racing Pigeon Club, with additional residential properties situated along both its northern and southern boundaries. The Abbey River is located 60m south of the proposed site.

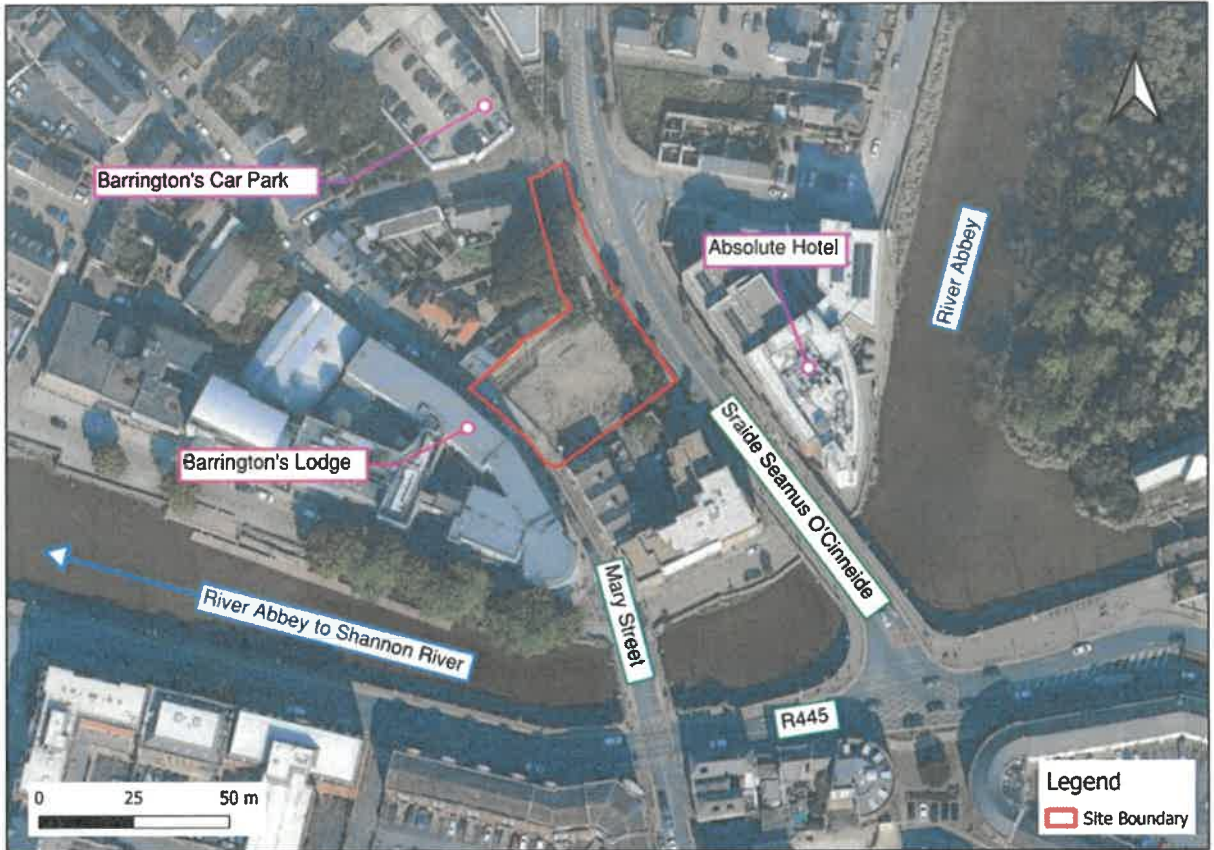


Figure 1: Site location map

2.1 Public Consultation:

The plans and particulars were placed on public display from the 15th of December 2025 up to and including 21st of January 2026. Submissions and observations were invited up to the 5th of February 2026.

3.0 Submissions with respect to the proposed development

One third party written submission/observation was received and one statutory body submission/observation was received and a summary of the issues raised in each are listed below:

No.	Name
1.	Aviary Estates Ltd. – Submission received 05/02/2026 Peter Madden, Aviary Estates Ltd. Mount Kennett Court, Dock Rd. Limerick.
SUB 1 Aviary Estates Ltd.	
Submission Summary:	
1. <u>Overview</u> We at Aviary Estates Ltd. act as managing agents for several properties both commercial and residential in the Mary St. area, including Georges Quay House, consisting of residential, offices, medical and commercial, a number of residential houses and the Barrington's Multi-Storey Car Park on Sheep St. and commercial units at Abbey River Court Sraide Seamus O Cinnéide. I have been	

operating businesses in the area for the past 30 years. We welcome development in the area however we have grave concerns regarding the development as proposed by the Limerick City and County Council on the 48-50 Mary St. site and make observations as follows.

Mayors' Response

Noted

2. Site Notices:

The proposed development site fronts onto Emily Place. No site notice has been erected on this street

Mayors' Response

Two nr. site notices were erected at the site; 1 nr. at the Mary Street site entrance, and a second site notice at Sráid Séamus Ó'Cinneide. All site notices were erected and maintained in place as per statutory requirements, and for the full statutory duration.

3. Open Space Amenity

Until recently this site was used as a school yard open space amenity for students of the adjoining Gael Coláiste. It was dug up to facilitate archaeological excavations. However, it has not been reinstated and is left in a state of dereliction. The adjoining school is currently occupied by Ard Scoile Muire who are currently left with no open amenity space. I see no reason the yard could not be reinstated prior to the commencement of any construction and used by the school until whatever development on the site is agreed. Also, the excavations uncovered would be protected from degradation by being further exposed to the weather elements

Mayors' Response

The playground surface was removed to enable a pre-planning programme of archaeological excavation, undertaken by a licensed consultant archaeologist, and necessary to identify the nature and exact location of all underground structures of interest. Refer to the Archaeological Impact Assessment submitted with this Part VIII application. Both the licensed consulting archaeologist and the Limerick City & County archaeologist were fully engaged with throughout the pre-planning design process, and associated programme of excavation works as described.

Further to excavation works, all trenches were backfilled as directed by the licensed consulting archaeologist. The site is currently secured by perimeter pallisade fence and not accessible to the public. Should this Part VIII application be approved, then a further programme of targeted archaeological excavation, recording and monitoring works will be undertaken prior to the construction of the proposed development. A licensed consulting archaeologist and the Limerick City & County archaeologist will be engaged with fully regarding same.

The former playground was not resurfaced further to excavation works as, subject to Part VIII approval, and owing to the fact that the school has vacated the site, the proposed development is likely to progress in 2026, and therefore said resurfacing works would in this instance not constitute appropriate use of exchequer funding.

4. Archaeological

The investigations carried out were restricted to the uppermost portions of these structures. It has been recommended where piling is required within the site, targeted

archaeological excavation must first be conducted at each pile location. Pits were dug to a maximum depth of 2.5m. while bedrock was recorded at depths 9.6m. What lies in the zone beneath? A comprehensive understanding of the site is required before a Part 8 is granted.

Given the rich archaeological potential of the site a more in-depth excavation should be carried out prior to any planning grant as the results of such an investigation may have an impact on the site development The Dominican Chapel wall nearby is a protected structure (RPS Reg. No. 3017), the new development will alter the ruin's current setting.

Combining this structure with cellar ruins already uncovered, should consideration of the development of this site be to complement Kings Johns Castle and promote tourism? I enclosed below photo of the custom house development in Galway, where the ruins of Hall Of Red Earl were incorporated into the building design. The current proposal may destroy unmapped 13th-century foundations that could be preserved as a tourist asset.

Mayors' Response

Previous programmes of excavation have identified the remains of 3 no. collapsed cellars/undercrofts. Refer to the Archaeological Impact Assessment submitted with this Part VIII application, complete with mitigation measures and recommendations.

The proposed apartment structure has been designed to be elevated above the cellar remains via a structural transfer slab. The elevated slab will strike a balance of allowing accessible access to the building, whilst also protecting the in-situ structures below same. Both the licensed consulting archaeologist responsible for preparing the Archaeological Impact Assessment, and the Limerick City & County archaeologist were engaged with throughout the pre-planning design process, including submission for review of proposals for structural design and associated finished floor levels.

As per the recommendations of the Archaeological Impact Assessment, a programme of targeted archaeological excavation, recording and monitoring works will be undertaken as part of the overall proposed development works, with a licensed consulting archaeologist to direct and monitor same.

Public access to in-situ walls:

The following measures are proposed for purpose of post-development public information, public education and visual access with respect to in-situ below ground walls and general history of the development site:

1. The development proposals include for public realm upgrades on both Mary Street & Sráid Séamus Ó'Cinneide. The Mary Street upgrade is proposed to include a transparent section of public footpath that will allow for general public viewing of a section of in-situ walls below ground.
2. The outline or 'map' of the in-situ walls (now recorded) will be represented on external areas throughout the site, including public realm areas and residential courtyards. This map will be represented by brass strip inset into external areas paving finishes.
3. Information boards, describing the nature and history of the development site, including that of the in-situ below ground walls, will be erected within the public realm areas of both Mary Street & Sráid Séamus Ó'Cinneide.

4. Both the location of the in-situ walls at the development site and the remains of the Dominican Chapel on Fish Lane will be proposed for inclusion on tourist information maps relating to Kings Island and English Town.

5. Shadow Studies

As managers of the Georges Quay House building we were not contacted with regard to occupancy and uses of the building when the shadow studies were conducted. Some of the facts stated are incorrect and impact on the conclusions.

Barrington's Hospital does not own any property that I am aware of facing Mary St. The Georges Quay House building uses include medical treatment consulting rooms, special needs day care centre, residential and offices which have highly sensitive receptors, daylight and privacy requirements. The significant loss of daylight as proposed is not acceptable.

The previous building on the proposed site was a single storey building fruit wholesale business. The proposed new building cannot be considered infill, as it will be the tallest building on Mary St. The scale and "A" roof design as proposed will seriously impinge on Georges Quay House daylight and other residences in the area. A 2 to 3 storey flat roof building would be much more in scale for the site and reduce daylight impact on the surrounding buildings.

Mayors' Response

The proposed development site is located at the southern end of King's Island and surrounded by developments of a similar scale. The site is zoned for up to 250 residential units per hectare as per the 2022-2028 Limerick Development Plan and the DHLGH Sustainable Residential Development & Compact Settlement Guidelines for Local Authorities, therefore it is reasonable to expect that a development of reasonable massing and scale is proposed at this site. The proposed development density is 176.5 units per hectare, and within the acceptable density range for this development site.

The Limerick Development Plan promotes the densification of urban sites;

"The policies and objectives in this Plan promote the efficient use of urban lands to achieve compact growth, through the intensification, consolidation and positive revitalisation of the City".

Compact and sustainable growth of urban settlements is a key and strategic objective of the National Planning Framework. With reference to both local and national planning policy and strategic objectives, it is proposed that the development proposal as submitted for approval does not constitute over-development of the site.

It is acknowledged that the proposed development will have some impact to natural light currently enjoyed by existing buildings (detailed in the Daylight & Sunlight Analysis assessment submitted with this Part VIII application), however given the development site is currently vacant, a development of any reasonable scale will have some impact on existing light conditions. Furthermore the current vacant condition of the site is not a long-term sustainable condition for a city-centre development site, so unless vacant city-centre sites are to remain vacant or underdeveloped indefinitely, then it is proposed that some impact on existing light conditions is reasonable and indeed to be expected with respect to city-centre development

It is important to also note that the proposed development will primarily impact the upper/northern end of the Georges Quay House property, and from the east on Mary Street. The lower/southern end of the Georges Quay House property is located south of the development site, with the southern and western facades of the Georges Quay House property unaffected by the proposed development.

The Daylight & Sunlight Analysis Assessment executive summary concludes as follows:

'This brown field site, close to Limerick's city centre, is typical of the type of site currently being redeveloped to increase housing supply. The Limerick Development Plan promotes the densification of urban sites in its Limerick Development plan; "The policies and objectives in this Plan promote the efficient use of urban lands to achieve compact growth, through the intensification, consolidation and positive revitalisation of the City". Given the constrained nature of the site the designers have achieved an effective balance between providing compact growth and delivering a scheme with good quality daylight and sunlight to the proposal, and limited impact on neighbouring buildings.'

The reference to 'Barringtons' in the design proposals refers to part of the Georges Quay House property on Mary Street that was up until recently in use by Barringtons Hospital, and is connected to the Barrington's Hospital building on Georges Quay. It is acknowledged that within the Georges Quay House property there are a range of room types and uses, however it is also important to note that the overall use is Medical & Commercial in nature. The proposed development at 48-50 Mary Street is for residential use opposite medical/commercial use, of which there is already precedent for same along Mary Street.

6. Dereliction in the Mary St. Area

I have identified 8 sites in the Mary Street area which I believe the LCCC own or have interests marked in red in map attached. It would appear that the LCCC are the major contributors to dereliction in the Mary St. area, however none of the sites mentioned appear on the derelict register. Mary St. Garda station has fallen into such a state of disrepair that it had to be partially demolished.

All recent developments to date have been for social housing. The LCCC appears to be attempting to shoehorn as much social housing concentration into this area with the creation of monotenure pockets. While in turn neglecting the King's Island development primary objectives in preserving its medieval heritage while revitalising it as a vibrant residential and tourism hub in Limerick. A comprehensive plan for the development of all the LCCC owned sites should be included and not the piecemeal approach that has currently been adopted by LCCC.

Mayors' Response

The proposed development focuses on the development of a currently vacant and derelict site into a high quality, energy efficient, and critically needed new build housing development, that will positively contribute to meeting local housing needs, and as per the conclusion of the Townscape & Visual Impact Assessment, will contribute positively to the streetscapes of lower Kings Island.

The current concentration of social housing, as a percentage of all housing within the electoral district where the proposed development is located, is below the 30% ceiling set for social housing as percentage of all housing, as set out in Limerick City & County

Council's Mixed Tenure Policy. Furthermore, significant developments in the locality, and specifically focusing on the redevelopment of existing derelict sites, are being actively progressed by Limerick & City Council, such as the recently announced THRIVE (Town Centre First Heritage Revival Scheme) funded transformation of 35-39 Nicholas Street into a design and innovation hub. The Forge Design Factory will provide space for artists, makers, entrepreneurs, and visitors, including studios, exhibition and retail areas, and a café/restaurant, with the aim of creating a vibrant destination at the heart of Limerick's Medieval Quarter. In addition, plans are progressing to redevelop the former Mary Street Garda Station into the Limerick Museum of Fashion, which will deliver a fashion hub to celebrate Limerick's fashion culture. Further development plans include an initiative led by TUS School of Art & Design to develop and maximise the Fannings Castle site as a design hub.

A diverse mix of unit types is proposed, to accommodate a varied range of resident types including elderly, couples and families. In addition, the building has been designed to Universal Design principles to accommodate residents of varying needs.

The proposed material finishes have been carefully selected to deliver a building of high architectural and engineering quality, with durable, robust, and low maintenance finishes, ensuring that both the building and the building finishes will endure the passage of time. The colour palette has been carefully selected with respect to conservation and heritage, with stone coloured brick and use of the colour terracotta at upper levels.

Regarding preservation of heritage, the development proposal has been designed with preservation of heritage as a priority. The apartment development is proposed as an elevated structure via a structural transfer slab, which will elevate the apartment building above the in-situ walls of heritage value below, ensuring long-term protection and preservation of same. An archaeological programme of excavation, monitoring and recording was undertaken at pre-planning stage under the supervision of a licensed consultant archaeologist, to ensure that design proposals are respectful of existing in-situ heritage. A further programme of targeted archaeological excavation, monitoring and recording will be undertaken as part of the development works, and again by a licensed consultant archaeologist, with detailed reporting regarding said excavations to be submitted to the Limerick City & County Archaeologist.

As per the response to Item No.4, a number of public information measures will be implemented to ensure the history and heritage of the site will be respected and communicated to the general public.

7. Mary Street Parking

As part of the 1994 development plan for King's Island in promoting tourism activities, the river walk was upgraded on Georges Quay, roads were cobbled and footpaths were widened on Georges Quay and Mary St. to promote amenities and a café culture. Street parking on Mary St. has been reduced to 4 No. public car spaces. The only loading bay cannot accommodate a delivery truck without blocking traffic. The current street parking is not adequate for existing residents, businesses including post office, band hall, offices etc. The proposed development does not have adequate set down for disabled access, taxi, deliveries, and ambulances etc, without blocking traffic flow.

Mayors' Response

Refer to Item No. 10 for a detailed response regarding private vehicular parking provision proposals.

In specific response to Item No. 7:

1. Detailed construction management and traffic management plans will be submitted to the Local Authority for approval prior to the commencement of construction works.
2. The proposed development is completely residential in nature, and as such does not require a loading bay for deliveries/loading purposes, or a dedicated taxi set-down area that would be a requirement for commercial use developments such as hotel or private hospital, where frequent taxi visitation would be expected.
3. Use of taxi pick-up/drop-off services are expected to be infrequent in nature and are not expected to cause significant traffic delays. Given the city-centre site location, residents will be within walking distance of the city centre taxi rank network, city bus network, national transport network, and cycle path & public street infrastructure for cycling purposes. Secure storage for 42 no. resident-only bicycle spaces will be provided for resident use.
4. Refuse collection will occur once-per-week and is not expected to cause significant traffic delays. A secure communal refuse store has been strategically located for ease and speed of refuse collection access.
5. A retractable bollard system to the front of the proposed development at Mary Street/Sráid Séamus Ó'Coinneide will be assessed with the Local Authority at pre-construction stage, regarding accommodation of infrequent set-down access by emergency services.

8. Emily Place Street Parking

There are only 3 designated parking spaces on this street and a partial footpath on one side, no signage or double yellow lines at critical pinch points which result in haphazard parking, thereby reducing and blocking access to the street. Cars can park all day without displaying a disc as per photos. Any further development in the area without dealing with the issues will exacerbate further the difficulties as outlined.

Mayors' Response

Refer to Item No. 10 for a detailed response regarding private vehicular parking provision proposals.

In specific response to Item No. 8:

Provision of public parking to public streets, in the vicinity of King's Island and English Town is within the scope of authority of the Limerick City & County Council Roads Department. Any upgrades to existing public parking infrastructure will be delivered by same.

9. Meat Market Lane/Sheep St. Street Parking

There are 2 designated spaces, one of these spaces is almost permanently used for disabled access parking. There are no bollards to prevent parking on footpaths.

Mayors' Response

Refer to Item No. 10 for a detailed response regarding private vehicular parking provision proposals.

In specific response to Item No. 9:

Provision of public parking to public streets, in the vicinity of King's Island and English Town is within the scope of authority of the Limerick City & County Council Roads Department.

Any upgrades to existing public parking infrastructure will be delivered by same.

10. Barringtons Car Park

Previously new developments in the area such as the Abbey River Court Apartments, school, hospital, and hotel in the area were required to provide on site parking or secure off-street parking in a multi-storey car park. However, planning conditions with regard to car parking were not enforced by the planning department.

This has compounded the issue of illegal car parking on the narrow street network. Other daily car parkers of this area use the free Kings Johns Castle tourist car park and until recently the unauthorised surface car park in front of the hotel. This combined with the closure of Barrington's Hospital, the Barrington's carpark is running currently less than 50% of its capacity. Going forward and it may not be economically viable to keep the car park open to the public.

LCCC own traffic department recommendation was for the provision of off-street parking for the Sheep St. part 8 social housing development, however the recommendation was overruled by planning. In the current Mary St. Part 8 submission it is stated that residents of the proposed new development will be eligible to apply for parking permits. I would question the availability of street parking in the area and the policy of not providing parking for new developments, on these already congested streets

Mayors' Response

National Planning Framework & Sustainable Mobility:

The National Planning Framework (NPF) 2018 sets out a high-level strategy for the planning and development of Ireland to 2040. The strategy to accommodate this growth in a sustainable way focuses on 10 national strategic outcomes that include Compact Growth, Sustainable Mobility, Enhanced Amenity and Heritage, a Low Carbon and Climate Resilient Society and the Sustainable Management of Water, Waste and Environmental Resources.

One of the targets of compact sustainable growth, is to target 50% of new housing growth in the five cities (Dublin, Cork, Limerick, Galway, Waterford) within the existing built-up footprint, on infill or brownfield lands. 48-50 Mary Street, Limerick is a development site that will contribute positively towards the delivery of this target.

Sustainable mobility within compact growth settlements is a key objective of the National Planning Framework (NPF). As per the 'Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities':

'In order to meet the targets set out in the National Sustainable Mobility Policy 2022 for reduced private car travel and increased active travel, it will be necessary to design settlements at every level to support the transition away from private car use and to support ease of movement for pedestrians, cyclists and public transport.'

The development site area for this Part VIII proposal is 0.18 ha. As per the 2022-2028 Limerick Development Plan car parking standards and requirements, for:

'urban infill schemes on sites of up to 0.25ha., car parking provision may be relaxed in part or whole, on a case-by-case basis, subject to overall design quality and location.'

Having regard to the above outlined national and local policy objectives, and considering the city-centre site location, this proposed Part VIII application does not propose vehicular parking for resident use, but will instead deliver secure resident bicycle storage, and importantly residents will be able to access, within walking distance, the public transportation network and a range of facilities, amenities, and services.

11. Open Space

As part of the proposed development a token open space is proposed facing Emily place which is cut off from the rest of the development and is not overlooked by the apartments. This open area as proposed would likely be subject to antisocial behaviour and vandalism. Instead of prioritising maximum density of apartments the open area should be central to the development for ease of access, security and be overlooked by the apartments. As proposed there is a shortfall in basic urban design required for public housing projects.

Mayors' Response

The part of the site proposed as open amenity space will be delivered as a high quality, secured and resident-only amenity space. As part of the development site, this amenity is adjacent to and easily accessible from the proposed apartment units.

Currently a derelict space which is shallow in nature, it is suited to landscaped open space development and will make a positive urban design contribution to the overall streetscape of Sraide Séamus Ó' Cinneide.

The space will be maintained by a contracted management company, and will soften the current streetscape through the addition of trees and general shrubs/flowers planting. The perimeter fence is proposed as high quality brick with railing, and will match the apartment development in material finish and colours. This landscaped space will be fully integrated, both physically and visually, within the overall development.

In addition, a number of good quality and accessible public open space amenities are located in close proximity to the proposed development and will be freely available to residents of same. These include O'Briens public park (400m away) and the extensive network of walking and cycling paths along the City Canal (300m away), which extend out to Corbally and the University of Limerick.

12. Traffic Mobility

The pedestrianisation of the Kings Johns Castle end of Nicholas St. has contributed to regular traffic and congestion build up on Mary St.

I use Mary St. regularly and a substantial amount of the traffic turns right onto Athlunkard St. If as part of the proposed Pidgeon lane refurbishment, the lane was linked with Sraide Seamus O Cinneide, widened and a set down area included marked in blue below, this could go a long way to alleviating the ongoing build-up of traffic and congestion issues. A comprehensive mobility and traffic survey need to be included for this development.

There is no method statement in the construction details to indicate if streets need to be blocked for construction of the proposed development. The most recent Part 8 development on Sheep St resulted in street closures for nearly 2 years which had a detrimental effect on local business including the car park.

Mayors' Response

Detailed construction management and traffic management plans will be submitted to the Local Authority for approval prior to the commencement of construction works.

13. Conclusions

The proposal constitutes over-development of a constrained city-centre site, fails to protect the setting and character of the Architectural Conservation Area. The impact of shadowing, and zero-parking policy adopted has not been justified.

I hope you will take our concerns and suggestions on board and won't lose sight of the King's Island development primary objectives in preserving its medieval heritage while revitalising it as a vibrant residential and tourism hub in Limerick, and this development won't be a case of history repeating itself with the 1930s construction of social housing within the King Johns Castle walls that were subsequently demolished in the 1990s?

Mayors' Response

The development proposals as submitted for Part VIII approval, have been the subject of detailed and thorough assessment by a number of independent consultants, including; Townscape Visual Impact Assessment, Daylight & Sunlight Analysis, Archaeological Impact Assessment, Conservation Assessment, Site Specific Flood Risk Assessment, a wide range of Environmental Impact assessments, and multiple Engineering assessments.

The proposed development has been carefully designed in consideration of and in response to existing context, and will deliver a high quality development appropriate to the site and site location.

As per the response to Item Nr.5 above, the proposed development is consistent with the strategic objectives of national and local planning policy, including the approach to and provision for private car use in a city-centre location. The development site is zoned for a development proposal of this scale, nature and use, and with a proposed development density within the acceptable density range.

To summarise, the development proposal does not constitute over development of the site, and as per the conclusions of the reports listed below, the scale, massing and architectural style of the proposal are appropriate to the site location and associated existing context.

The Townscape Visual Impact Assessment concludes as follows:

'Based on the above analysis, and informed by the verified photomontages, the townscape effects of the proposed development can be classified 'moderate positive' in significance. The development would positively affect the streetscapes and visual amenity of Mary Street and Seamus Kennedy Street, and the wider English Town character area. The development would cause no negative effects on King John's Castle or St Mary's Cathedral, nor on any of the Significant Views identified in the LCDP Building Height Strategy.'

The Daylight & Sunlight Analysis Assessment executive summary concludes as follows:

'This brown field site, close to Limerick's city centre, is typical of the type of site currently being redeveloped to increase housing supply. The Limerick Development Plan

promotes the densification of urban sites in its Limerick Development plan; “The policies and objectives in this Plan promote the efficient use of urban lands to achieve compact growth, through the intensification, consolidation and positive revitalisation of the City”. Given the constrained nature of the site the designers have achieved an effective balance between providing compact growth and delivering a scheme with good quality daylight and sunlight to the proposal, and limited impact on neighbouring buildings.’

The Conservation Report concludes as follows:

‘The Development Plan mandates the protection of structures on the Record of Protected Structures (RPS). The duty to protect extends to our architectural heritage setting, not just the form and structural integrity. The Dominican Chapel wall is a protected structure (RPS Reg. No. 3017), valued for its historical significance. However, Dominican Chapel ruin is not listed as a key visual landmark in English Town in the LCCC Tall Buildings Strategy as contained in Volume 6. The proposed development includes for a complete upgrade of the public realm relating to the Mary Steet site frontage, with a potential future extension of this to continue down Fish Lane to the existing ruin. English Town will benefit from redevelopment of an underutilized site by the development of a strong and coherent and contemporary building that reads clearly as a modern intervention. At the same time the new development will of course alter the ruin's current setting. The project will enclose the ruin partially reducing its visual presence by obstructing the current public approach view (refer to figure 8) enjoyed from Mary Street.’

Submission from Statutory Bodies:

No.	Name
1.	Uisce Eireann – Date received 03/02/2026 Uisce Eireann, PO Box 448, South City, Delivery Office, Cork City.

SUB (1): Uisce Eireann

Submission Summary:

1. The applicant shall enter into a Connection Agreement with Uisce Éireann to provide for a service connections to the public water supply and wastewater collection network and adhere to the standards and conditions set out in that agreement

Mayors’ Response

Noted

2. In order to accommodate the proposed connection at the Premises, upgrade works are required to increase the capacity of the Uisce Éireann wastewater network. Approximately 50m of existing 150mm diameter wastewater network requires upgrade to 225mm diameter. Uisce Éireann does not currently have any plans to carry out the works required to provide the necessary upgrade and

capacity. The upgrades required shall be funded by the applicant/ developer in accordance with the terms and conditions set out in the Connection Agreement with Uisce Éireann.

Mayors' Response

Noted

3. All development shall be carried out in compliance with Uisce Éireann's Standard Details and Codes of Practice

Mayors' Response

Noted

4. Uisce Éireann does not permit Build Over of its assets. Where the applicant proposes to build over or divert existing water or wastewater services the applicant shall have received written Confirmation of Feasibility (COF) of Diversion(s) from Uisce Éireann prior to any works commencing.

To ensure adequate provision and protection of water and wastewater facilities, Uisce Éireann recommends the following;

1. Where the applicant seeks a connection to the public network, the applicant shall enter into a connection agreement with Uisce Éireann prior to the commencement of the development and adhere to the standards and conditions set out in that agreement.
2. There shall be no build over of public infrastructure from these proposals. Separation distances as per Uisce Éireann's Standards Codes & Practices shall be achieved where public infrastructure is in situ within and/or adjacent to site boundaries*.
3. The development shall not impact public drinking water sources and/or abstraction point(s) and/or abstraction infrastructure**.
5. The design and construction of the Water & Wastewater pipes and related infrastructure to be installed in this Development shall comply with the Uisce Éireann Connections and Developer Services Standard Details and Codes of Practice.

Mayors' Response

Noted

Advisory Note No. 1

*Uisce Éireann does not permit build over of its assets. Separation distances from public infrastructure, as per Uisce Éireann's Standards Codes and Practices must be achieved. It is the applicant's responsibility to submit a diversion enquiry to Uisce Éireann Diversions Section (diversions@water.ie) prior to construction, where a potential build over of public assets is in question and/or where the applicants proposals cannot achieve separation distances from public infrastructure as per UÉ Standards & Codes of Practice

Mayors' Response

Noted

Advisory Note No. 2

** Protection of drinking water source(s) from potentially adverse impacts is a priority for Uisce Éireann. It is Uisce Éireann's current policy to maintain safe and secure drinking water supplies and ensure that development will not give rise to any deterioration in water quality. Development proposals shall not impact public drinking water sources and/or abstraction point(s). It is also a requirement of the Water Framework Directive that waters used for the abstraction of drinking water are protected to avoid deterioration in quality. Development proposals shall not impact public drinking water sources and/or abstraction point(s). Any person discharging trade effluent** to a sewer, must have a Trade Effluent License issued pursuant to section 16 of the Local Government (Water Pollution) Act, 1977 (as amended). More information and an application form for a Trade Effluent License can be found at the following link: <https://www.water.ie/business/trade-effluent/about/> . Trade effluent is defined in the Local Government (Water Pollution) Act, 1977 (as amended). Uisce Éireann does not permit surface waters into the public sewer network

Mayors' Response

Noted

4.0 Habitats Directive Project Screening Assessment

An Appropriate Assessment Screening Report has been undertaken by JBA Consulting for the proposed development. Three Natura 2000 designated sites are within 15km of the site however only two of these are within the zone of influence. The Lower River Shannon SAC (Site code 002165) is located approximately 60m from the proposed site and the River Shannon and River Fergus Estuaries SPA is within 1.1km of the proposed development. The AA Screening report determined that *proposed project is of small scale and nature, the low levels of impact on any Natura 2000 sites within the Zone of Influence. No qualifying interest are anticipated to be impacted upon by the proposed project.*

The Council's Heritage Officer has reviewed the AA Screening and agrees with the findings. He states that the works are not within the SAC site, are limited in scale and is located in a previously modified urban area which has a long history of human activity. Progression to stage 2 is not necessary.

Overall, it is considered that having regard to the scale of the development within a city centre location and the distance of the development from any SAC and SPA, 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. Therefore a Stage 2 NIS is not necessary.

5.0 Environmental Impact Assessment Screening

An EIA screening report has been undertaken by JBA Consulting for the proposed development. The EIA Screening Assessment has determined that the proposed development does not fall under Schedule 5 (Parts 1 and 2) of the Act and as such, an EIAR has not been automatically triggered. A screening exercise was undertaken to

determine whether the development may fall under the category of Sub-threshold development. During construction, typical impacts such as noise, dust, traffic disruption, and the generation of small amounts of waste are to be expected. An AA Screening Report, INNSS and Bat Survey Report have been prepared by JBA Consulting for the proposed development. The EIA Screening report states that *The overall conclusion that an EIAR is not required, is based on the details of the scheme available at the time of preparation of this report. If the extent of the scheme or the construction methods for the scheme are changed, then the EIA Screening assessment should be reviewed.*

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 there is no real likelihood of significant effects on the environment arising from the proposed development a full Environmental Impact Assessment is not required for this project.

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:

Zoning: City Centre

Objective: To protect, consolidate and facilitate the development of the City Centre commercial, retail, educational, leisure, residential, social and community uses and facilities.

Purpose: To consolidate Limerick City Centre through densification of appropriate commercial and residential developments ensuring a mix of commercial, recreational, civic, cultural, leisure, residential uses and urban streets, while delivering a high-quality urban environment which will enhance the quality of life of residents, visitors and workers alike. The zone will strengthen retail provision in accordance with the Retail Strategy for the Limerick Shannon Metropolitan Area and County Limerick, emphasise urban conservation, ensure priority for public transport, pedestrians and cyclists, while minimising the impact of private car-based traffic and enhancing the existing urban fabric.

Chapter 11 Development Management

Objective HO O5 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.

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 O1 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 O2 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.

Objective HO O3 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.

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.

Objective CGR O3 Urban Lands and Compact Growth

It is an objective of the Council to:

- a) Deliver 50% of new homes within the existing built-up footprint of Limerick City and Suburbs (in Limerick), Mungret and Annacotty and 30% of new homes within the existing built-up footprint of settlements, in a compact and sustainable manner in accordance with the Core and Housing Strategies of this Plan.
- b) Encourage and facilitate sustainable revitalisation and intensification of brownfield, infill, underutilised and backland urban sites, subject to compliance with all quantitative and qualitative Development Management Standards set out under Chapter 11 of this Plan

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.

Chapter 2 Core Strategy

Density Zone 1: City Centre, Central & Accessible Locations: A minimum net density of 100+ dwelling units per hectare are required at appropriate locations within the City Centre.

Chapter 11 Development Management Standards

Car-free developments will be considered for all proposals on a case-by-case basis. The site is located in Zone 2 as indicated in Chapter 2 – Core Strategy - Map 2.2 Limerick City & Suburbs Density Zones.

Car & Bicycle Parking:

Table DM 9 (a): Car and Bicycle Parking Standards Limerick City and Suburbs (in Limerick).

Objective PF O1 Physical Framework Strategy

It is an objective of the Council to:

- a) Build a strong competitive economy.
- b) Promote healthy communities.
- c) Require good design.
- d) Promote sustainable movement.
- e) Deliver a wide choice of high-quality homes.
- f) Support high quality communications infrastructure.
- g) Meet the challenge of climate change and flooding.
- h) Conserve and enhance the natural and historic environments.

Policy TR P7 Sustainable Travel and Transport

It is a policy of the Council to support, facilitate and co-operate with relevant agencies to secure sustainable travel within Limerick and seek to implement the 10-minute city/town concept, promote compact growth and reduce the need for long distance travel, as a means to reduce the impact of climate change.

Objective CAF O4 Climate Proofing

It is an objective of the Council to ensure climate proofing measures are incorporated into the design, planning, layout and orientation and construction of all developments, including the use of sustainable materials, selection of suitable locations and the use of renewable energy sources.

Objective CAF O6 Energy Efficiency in New Developments

It is an objective of the Council to ensure that all developments are designed to take account of the impacts of climate change. This will include the installation of rainwater harvesting systems, sustainable urban drainage systems and nature-based solutions for water management. Energy efficiency and renewable energy measures should be incorporated, in the cases of large industrial, commercial or newly constructed public buildings. The incorporation of renewable technologies, such as solar energy in the design will be encouraged, subject to compliance with all relevant planning criteria.

3.3 Settlements, Area Types and Density Ranges

3.3.1 Cities and Metropolitan (MASP) Areas

The key priorities for city and metropolitan growth in order of priority are to:

- (a) strengthen city, town and village centres,
- (b) protect, restore and enhance historic fabric, character, amenity, natural heritage, biodiversity and environmental quality,
- (c) realise opportunities for adaptation, reuse and intensification of existing buildings and for incremental brownfield and infill development,
- (d) deliver brownfield and infill development at scale at suitable strategic and sustainable development locations within the existing built up footprint of the city and suburbs area or metropolitan towns,
- (e) deliver sustainable and compact urban extension at scale at suitable strategic and sustainable development locations that are close to the existing built-up footprint of the city and suburbs area or a metropolitan town and served by existing or proposed high-capacity public transport, and
- (f) deliver sequential and sustainable urban extension at suitable locations that are closest to the urban core and are integrated into, or can be integrated into, the existing built-up footprint of the city and suburbs area or a metropolitan town.

Objective CGR O9 Building Heights

It is an objective of the Council to:

- a) Ensure that all new tall buildings in Limerick City are designed in accordance with the character area objectives, tall building recommendations and criteria set out in the Development Management Standards. All such buildings shall be of an exceptional architectural quality and standard of design and finish.
- b) Focus delivery of tall buildings in the City Centre, in particular the areas that have been identified as having potential for increased building height. In particular, tall building clusters will be encouraged at The Quays, Colbert Station Quarter, Cleeves Site and The Docklands in accordance with the building classification criteria set out in the Building Height Strategy. There shall be a general presumption against tall buildings in other areas, except at designated areas and the gateway locations identified in the Tall Buildings at City Level Map below.
- c) Protect the unique intrinsic character, scale and significant views of Limerick City, the skyline and key landmark buildings in the delivery of increased building heights, through the application of the Tall Building Classifications, Recommendations, High Level Principles and Assessment Tools and Criteria set out in the Building Height Strategy.
- d) Ensure applications for tall buildings are supported by the following assessments and any additional assessments required at the discretion of the Planning Authority - Environmental Assessment, Wind Analysis, Sunlight and Daylight Analysis, Verified View Analysis, Landscape and Visual Impact Assessment, Architectural Design Statement, Traffic Impact Assessment including a Mobility Management Plan for non-residential uses, Building Services Strategy.

3.3.1.3 Brownfield Sites

Brownfield land is a term used to describe previously developed land that is not currently in use and which has the potential for redevelopment. Often such lands are of large scale and have previously been in use for industrial or commercial purposes and became derelict due to obsolescence, vacancy or demolition of structures. Some

brownfield sites may have a legacy of contamination from operational activities or waste disposal.

Redeveloping brownfield sites provides opportunities for revitalisation of the built environment and reuse of existing infrastructure including roads and utilities. The Planning Authority will encourage the redevelopment of brownfield sites in settlements throughout Limerick, in accordance with the concept of compact growth and the Development Management Standards of this Plan.

Building Height Strategy

Policy TB6 Assessment of Tall Building

Limerick City and County Council will aim to protect the special character of the City Centre by applying the following provisions of this Building Height Strategy for Limerick City in the assessment of all proposals for tall buildings:

- Utilise the ‘Tall Building Classifications’ to determine the height of the building in its context;
- Assess the proposal against the ‘Tall Building Recommendations’;
- Apply the ‘Tall Buildings - High Level Principles’;
- Utilise the ‘Localised Assessment Tool - Tall Buildings’; and
- Apply the list of assessment criteria outlined in Policy TB 7

Policy TB7 Assessment Criteria for Tall Building

Limerick City and County Council will take account of the following in assessing applications for tall buildings:

- The site context - Including inter alia topography, natural environment, landscape, height, built form, urban grain, scale, streetscape and impact on the skyline;
- Impact on significant buildings, views, landmarks and landscapes - Tall building proposals should address the potential effect on the setting of, and views to and from the following over a wide area:
 - The architectural quality of the building - Including inter alia its form, scale, massing, facade materials, proportion, relationship to other structures and the design of the top portion in terms of its potential impact on the skyline;
 - The impact on the local environment - Including inter alia overlooking, daylight and sunlight, microclimate, wind, overshadowing, glare, loss of privacy, over-bearing, and the impact on residents due to the use of the building;
 - Compliance with best practice in terms of the facilitation of sustainable modes of transport and the delivery of transport orientated development - Specifically the level of public transport provision to the site, the capacity of the public transport network and the quality of links between the site and public transport;
 - The impact on the surrounding context - Including inter alia localised views, the quality and scale of existing streets, spaces and adjacent buildings and the contribution to permeability at both the site level and the wider area;
 - The contribution to wayfinding - This includes the building’s role as a locational marker from the local, street level, to the wider City wide level;
 - Sustainability and environmental performance - Including inter alia design, construction technology, materials, renewable energy initiatives, adaptability, operation and management;
 - The contribution to public spaces, amenities and facilities, both internal and external - Including inter alia the provision of a mix of uses, especially at ground floor level, publicly accessible areas and spaces and the integration with and contribution to the public realm; and

- The quality of the built environment - From the perspective of those who will be using the building

Section 28 Guidelines

- 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 and Building Heights Guidelines for Planning Authorities Consultation 2018
- Design Standards for New Apartments - Guidelines for Planning Authorities, 2023
- 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
- Appropriate Assessment Guidelines for Planning Authorities

National Planning Framework

National Policy Objectives (NPO) 2(a) relating to growth in our cities;

- NPO 3(a)/(b)/(c) relating to brownfield redevelopment targets;
- NPO 4 relating to attractive, well-designed liveable neighbourhoods;
- NPO 5 relating to sufficient scale and quality of urban development; and
- NPO 6 relating to increased residential population and employment in urban areas;
- NPO 13 identifies building height as an important measure for urban areas to deliver and achieve compact growth as required etc

Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (2020)

Section 2.4-1 - Central and/or Accessible Urban Locations

Such locations are generally suitable for small- to large-scale (will vary subject to location) and higher density development (will also vary), that may wholly comprise apartments, including:

- Sites within walking distance (i.e. up to 15 minutes or 1,000-1,500m), of principal city centres, or significant employment locations, that may include hospitals and third-level institutions;
- Sites within reasonable walking distance (i.e. up to 10 minutes or 800- 1,000m) to/from high capacity urban public transport stops (such as DART or Luas); and
- Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) to/from high frequency (i.e. min 10 minute peak hour frequency) urban bus services. The range of locations outlined above is not exhaustive and will require local assessment that further considers these and other relevant planning factors.

Objective CGR O9 Building Heights It is an objective of the Council to:

- a) Ensure that all new tall buildings in Limerick City are designed in accordance with the character area objectives, tall building recommendations and criteria set out in the Development Management Standards. All such buildings shall be of an exceptional architectural quality and standard of design and finish.
- b) Focus delivery of tall buildings in the City Centre, in particular the areas that have been identified as having potential for increased building height. In particular, tall building clusters will be encouraged at The Quays, Colbert Station Quarter, Cleves Site and The Docklands in accordance with the building classification criteria set out in

the Building Height Strategy. There shall be a general presumption against tall buildings in other areas, except at designated areas and the gateway locations identified in the Tall Buildings at City Level Map below.

c) Protect the unique intrinsic character, scale and significant views of Limerick City, the skyline and key landmark buildings in the delivery of increased building heights, through the application of the Tall Building Classifications, Recommendations, High Level Principles and Assessment Tools and Criteria set out in the Building Height Strategy.

d) Ensure applications for tall buildings are supported by the following assessments and any additional assessments required at the discretion of the Planning Authority - Environmental Assessment, Wind Analysis, Sunlight and Daylight Analysis, Verified View Analysis, Landscape and Visual Impact Assessment, Architectural Design Statement, Traffic Impact Assessment including a Mobility Management Plan for non-residential uses, Building Services Strategy.

Sustainable and Compact Settlements Guidelines for Planning Authorities – January 2024

These Guidelines replace the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (2009). The Sustainable and Compact Settlements Guidelines set out policy and guidance in relation to the planning and development of urban and rural settlements, with a focus on residential development and the creation of sustainable and compact settlements. The Guidelines set out policy and guidance in relation to key growth priorities for settlements and set out specific planning policy requirements (SPPRs) in relation to housing standards ie. Separation distances, minimum private open space standards for houses, public open space standards and car parking standards.

In order to achieve compact growth, the Guidelines note that we will need to support more intensive use of existing buildings and properties, including the re-use of existing buildings that are vacant and more intensive use of previously developed land and infill sites, in addition to the development of sites in locations served by existing facilities and public transport.

To achieve compact growth, it will also be necessary to increase the scale of new buildings in all parts of our cities and towns, with highest densities at the most central and accessible urban locations, particularly in city centres and close to public transport nodes and interchanges. It will also be necessary to adapt the scale and form of development to the receiving environment and to ensure a proportionate response.

The Guidelines note that the key priorities for city and metropolitan growth in order of priority are to:

- (a) strengthen city, town and village centres,
- (b) protect, restore and enhance historic fabric, character, amenity, natural heritage, biodiversity and environmental quality,
- (c) realise opportunities for adaptation, reuse and intensification of existing buildings and for incremental brownfield and infill development,
- (d) deliver brownfield and infill development at scale at suitable strategic and sustainable development locations within the existing built up footprint of the city and suburbs area or metropolitan towns,

- (e) deliver sustainable and compact urban extension at scale at suitable strategic and sustainable development locations that are close to the existing built-up footprint of the city and suburbs area or a metropolitan town and served by existing or proposed high-capacity public transport, and
- (f) deliver sequential and sustainable urban extension at suitable locations that are closest to the urban core and are integrated into, or can be integrated into, the existing built-up footprint of the city and suburbs area or a metropolitan town.

Table 3.2 of the Guidelines sets out the density ranges for the city and suburb areas of Limerick, Galway and Waterford based on three areas:

- City-Centre
- City – Urban Neighbourhood
- City – Suburban/Urban Extension

The subject site is considered to fall within the City-Centre density range and which states:

The city centres of Limerick, Galway and Waterford, comprising the city centre and immediately surrounding neighbourhoods, are the most central and accessible urban locations in their regions with the greatest intensity of land uses, including higher order employment, recreation, cultural, education, commercial and retail uses. It is a policy and objective of these Guidelines that residential densities in the range 100 dph to 250 dph (net) shall generally be applied in the centres of Limerick, Galway and Waterford.

Design Standards for Apartments - Guidelines for Planning Authorities, 2025

Specific Planning Policy Requirements

7.0 Appraisal

Principle of Development:

The proposed development comprises the construction of a 3–5 storey building accommodating 30 no. apartment units, broken down as follows:

- 9 no. studio units
- 7 no. one-bedroom units
- 10 no. two-bedroom units
- 4 no. three-bedroom units

The development consists of 2 no. blocks: a 3–5 storey block addressing Mary Street and a 4–5 storey block addressing Sráid Séamus Ó’Cinneide. Both blocks are to be served by a single, centrally located stair and lift core.

The proposal also includes:

- secure storage for 42 no. resident bicycle parking spaces
- a communal refuse storage area
- a resident storage room

Site and external works include the removal of the existing palisade perimeter fencing, to be replaced with the proposed new building, associated landscaping, and public realm improvements.

The development further provides for:

- a new secure communal open space for residents on Sráid Séamus Ó' Cinneide
- 2 no. car parking spaces for Pigeon Club use, accessed from Sráid Séamus Ó' Cinneide
- public realm enhancements to both Mary Street and Sráid Séamus Ó' Cinneide, including replacement of footpaths
- 18 no. new visitor bicycle parking spaces on Mary Street
- new pedestrian-only access lanes from Mary Street and Sráid Séamus Ó' Cinneide to the proposed building
- new public lighting
- connection to existing foul and surface water networks
- all ancillary site development and landscaping works

The proposed development will also include archaeological excavation works relating to existing in-situ walls (Sites & Monuments Record LI005-0017148).

The application site consists of a city centre infill / brownfield plot measuring 0.17ha in size with Mary Street located to the west and Sráid Séamus Ó' Cinneide located to the east. The application site is located on the southern part of King's Island and is bordered to the north by St. Mary's Racing Pigeon Club, with additional residential properties situated along both its northern and southern boundaries. The Abbey River is located 60m south of the proposed site.

The site is zoned *City Centre* under the provisions of the Limerick Development Plan 2022-2028. The proposed development is acceptable in principle subject to normal planning considerations.

Policy CGR P1 Compact Growth and Revitalisation seeks to activate underutilised sites within the existing built footprint of Limerick City. This site is a brownfield infill city site that is currently vacant and underutilised. The proposed development would provide the delivery of more compact and consolidated growth, which is to be welcomed. Having regard to the above, the proposal is considered acceptable in principle.

Density

The site is located within Density Zone 1 as set out in the Limerick Development Plan which requires a minimum net density of 100+ dwelling units per hectare. It is a policy and objective of the Sustainable and Compact Settlement Guidelines that residential densities in the range of 100dph to 250dph shall generally be applied in the centres of Limerick, Galway and Waterford. The site is 0.17ha in size and the proposal is for 30 apartments which equates to a density of 176 units per hectare. Given the site's city centre location, its proximity to a mix of surrounding uses and public transport routes, the proposed density is considered acceptable and is in compliance with both local, regional and national policy.

Layout and Design

The proposed development comprises of 30 no. residential units on an infill, city centre development site at 48-50 Street. The development will be comprised over 3-5 stories in height and will include the creation of a new public pedestrian lane that connects

Mary Street to Sráid Séamus Cinnéide, both of which bound the development site. As stated in the Townscape and Visual Impact Assessment the site is located in an area adjacent to a contemporary, high density, urban/edge/waterfront development. The proposed development consists of 2 no. blocks; a 3–5 storey block addressing Mary Street and a 4–5 storey block addressing Sráid Séamus Ó’Cinneide.

The proposed development is set off the northern and southern boundaries by 3m and 1.9m respectfully. No. 47 Mary Street consists of a 1.5 storey dormer dwelling with St. Marys Pigeon Club located to the rear. The proposed development is stepped 3 stories in height along this northern boundary. This design measure ensures that there will be no loss of residential amenity by way of overlooking on the existing development at no. 47 Mary Street. It is noted that side and courtyard facing windows are to be a mix of transparent and translucent glazing, to limit overlooking. High level windows are also proposed along this elevation which is welcomed. Along the southern boundary of the site, no. 56 -61 Mary Street comprises of a three-storey apartment unit. The proposed development along the southern boundary increases to 4 stories in height with setback penthouse apartments at fifth floor level. Given the separation distance of 5m from the proposed development to no. 51 Mary Street, the proposal is considered acceptable.

The development fronting Sráid Séamus Ó’Cinneide comprises of a 4-5 storey block. This is in keeping with the existing 4-5 storey development at Sandmall Apartments which is situated circa 16m to the south and considered acceptable.

All proposed units include private ground-floor amenity space and either an internalised or external balcony at upper levels. Each unit has their own individual private amenity space which complies with National and Local Policy. The incorporation of balconies will enhance passive surveillance along both streets and lanes bounding the site. An area of public open space is located to the north of the site. New access gates to the Pigeon Club are proposed from St. Marys street and railings border the site.

Sunlight/Daylight

A Daylight and Sunlight Analysis was prepared by Model Works and submitted along with the application documentation. In relation to Daylight to Buildings, five of the six neighbouring buildings were assessed to experience only minor impact, and one was predicted to experience moderate impact. In relation to Sunlight to Buildings, Five of the six buildings were assessed to experience only minor impact, and one would experience negligible impact. In relation to Sunlight to Amenity Areas, Fourteen of the neighbouring private gardens were assess for potential impact, with 12 meeting the BRE Criteria.

It is noted that while the development will reduce the level of sunlight in relation to amenity areas of no. 47 Mary Street, this loss must be considered in light of broader policy imperatives. Under the Limerick Development Plan 2022-2028 compact growth, reducing sprawl, densification and repopulation of the city centre are important statutory goals with the need for more housing supply, particular within the existing urban infrastructure is acute. Furthermore, the proposed impact is on amenity areas and given the city centre location, and its proximity to the park canal and O’Briens Park situated circa 500m to the east, the proposal is in accordance with Policy CS P2 Compact Growth and Objective CGR O3 Urban Lands and Compact Growth. The proposal is considered acceptable.

The proposed development comprises of a variety of dwelling types in response to local housing need:

- 9 no. studio units / one person (30%)
- 7 no. one-bedroom units / two person (23.3%)
- 10 no. two-bedroom units / mix of two person / four person (33.3%)
- 4 no. three-bedroom units / five person (13.3%)

The development has a proposed brick finish from ground to fourth floor level with a pigmented render finish and proposed standing seam metal roof finish to set-back penthouse level. Powder coated galvanised steel railings to private balconies are proposed as well as fixed side glazed panel to apartment living space behind. The proposed finishes are considered acceptable.



Figure 2: Photomontage of a view along Seamus Kennedy Street

Compliance with Design Standards for New Apartment Guidelines 2025

The applicant has submitted a schedule of accommodation and apartment drawings with legends noting the floor areas of each of the apartment.

SPPR 1:

(A) With the exception of social housing developments, social/affordable housing provided for under Part V the Act or schemes to provide housing for older persons where a specific mix of unit sizes may be required, such as in accordance with a Housing Need and Demand Assessment (HNDA), there shall be no restrictions within statutory plans in relation to the mix of unit sizes or types to be provided within apartment developments. There shall be no minimum or maximum requirements for apartments with a certain number of bedrooms.

(B) Where any such restriction or requirement is set out within a statutory plan, this Specific Planning Policy Requirement shall apply to any single apartment scheme and there shall be no restriction in relation to the mix of unit sizes or types and there shall be no minimum requirements for apartments with a certain number of bedrooms within the development, except in the circumstances set out above

The proposal is for 30 apartments consisting of studio, 1, 2 and 3 bed apartments. As set out in SPPR1 there are no restrictions in relation to the mix of unit sizes or types to be provided within apartment developments. The proposal is therefore considered compliant with SPPR 1.

SPPR 2:

The following minimum apartment floor areas shall apply and statutory plans shall not specify minimum floor areas that exceed the minimum floor areas set out below:

*Studio apartment (1 person) 32sq.m
1-bedroom apartment (2 persons) 45 sq.m
2 bedroom apartment (3 persons) 63 sq.m
2-bedroom apartment (4 persons) 73 sq.m
3-bedroom apartment (4 persons) 76 sq.m
3-bedroom apartment (5 persons) 90 sq.m*

The floor area parameters set out above shall generally apply to apartment schemes and do not apply to purpose-built and managed student housing.

Studio units proposed are between 35 and 39sqm and meet the above the above standards for one person occupancy. The proposal complies with SPPR 2.

SPPR 2 states that at least 25% of units within the development shall exceed the minimum sizes by 10% but this does not apply to urban infill schemes on sites of up to 0.25ha. It is considered that as this is an urban infill scheme on a site of 0.17ha, this standard is not required. The proposal is therefore considered acceptable.

SPPR 3:

In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:

- (i) A minimum of 25% of units within a development shall be required to be dual aspect. Statutory plans shall not specify minimum requirements that exceed the requirements of this Specific Planning Policy Requirement.*
- (ii) 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 25% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.*

Given that the site is an urban infill scheme on a site 0.17ha, in size the above SPPR is not applicable. However, it is noted that the proposal has a minimum of 25% of units dual aspect.

Minimum floor areas – Storage

The Guidelines recommend the following requirements with regards to storage:

Studio	3 sq.m
One bedroom	3 sq.m
Two bedrooms (3 person)	5 sq.m
Two bedrooms (4 person)	6 sq.m
Three bedrooms (4 persons)	6 sq.m
Three bedrooms (5 persons)	9 sq.m

The sqm of storage per apartment is not specifically stated however each apartment type does have individual storage. The Guidelines further state that where secure, allocated storage is provided in addition to that within individual units, it may be used to satisfy up to half of the minimum storage requirement for individual apartment units, but shall not serve to reduce the minimum floor area required to be provided within each individual apartment unit, as set out in these Guidelines. A communal storage area is provided at ground floor which will provide additional storage for all of the apartments. The proposal is considered acceptable.

The proposed scheme has taken into account the sites constraints and has been designed with each dwelling type designed to maximise overlooking of public areas. Elevations are designed to incorporate corner balconies to enhance passive surveillance of the laneways along the northern and southern boundaries. The floor area and internal spaces are in accordance with the Planning Design Standards for Apartments Guidelines for Planning Authorities, 2025 and the Quality Housing for Sustainable Communities, 2007. The proposal is considered acceptable.



Figure 3: Photomontage of before and after along Sraid Ó Cinnéide

Access and Traffic Safety

No parking is proposed as part of the development. Table DM 9(a) of the Limerick Development Plan notes that on urban infill schemes on sites of up to 0.25ha, car parking provisions may be relaxed in part or whole, on a case-by-case basis, subject to overall design quality and location. The site is an infill and brownfield scheme on a site of 0.17ha in size. Furthermore, the site is located within Limerick City Centre and within close proximity to public transport such as cycle infrastructure and a new proposed bus connects route planned (route No.1 and No.5 along Athlunkard Street and Island Road respectively and planned route No.4 along R445). It is therefore considered that the proposed development is acceptable and in line with national policy which promotes more sustainable modes of transport and modal shift away from the private car.

A Stage 1/2 Road Safety Audit was prepared by CST Group Chartered Consulting Engineers. **All issues outlined in the Road Safety Audit, will need to be addressed at detailed design stage.** The proposal is considered acceptable.

Bike Parking

Bike parking, communal storage and a bins store is proposed internally at ground floor level. 58 bike parking spaces are proposed this is broken down as 42 no. residential spaces and 16 no. visitor spaces. As set out in Table DM 9 of the LDP, 1 bike space is required for 1-2 bed apartments and a further 1 space per 2 units for visitors. 2 spaces per unit are required for 3 bed apartments and 1 space per 2 units. This equates to 34 resident spaces and 15 visitor spaces and therefore a total of 49 bike spaces is required. The proposal is therefore considered acceptable.

Archaeology

The site is located within Englishtown on King's Island. Within the proposed development site are three cellars or undercrofts, a wardrobe and other associated features (CH001), which are a recorded monument (LI005-017148).

An Archaeological Impact Assessment was undertaken and submitted with the documentation. The report has recommended various mitigation measures which will be implemented to protect the archaeological designations surrounding the site.

Conservation

The site is not located within an ACA, however it is noted that the proposed site is located within a Historic area of Englishtown within Kings Island.

The Conservation Officer has reviewed the information submitted and has stated that *the architectural heritage impacts of the development have been given due consideration in the design process and the application documents*. Full report attached below. The proposal is considered acceptable.

Services

A new foul network will be constructed around the proposed building to cater for the development's foul flows. According to the Confirmation of Feasibility issued by Uisce Éireann, they stated that Upgrade works are required to increase the capacity of the Uisce Éireann wastewater network. Details of these required upgrades have been outlined in the report submitted. In relation to the proposed watermain, a Pre-Connection Enquiry form (CDS24008081) has confirmed that the existing watermain connection for the development can accommodate the flow of the proposed development. The proposal is considered acceptable.

Surface Water and Sustainable Urban Drainage Systems (SuDS)

As per LDP policy on surface water drainage, the proposed development has been assessed in relation to Sustainable Urban Drainage Systems (SuDS). All SuDS measures are to be implemented with reference to the UK Suds Manual and Limerick City & Council (LCCC) drainage requirements. These measures include permeable pavements and the inclusion of infiltration tanks. The Roads Department has reviewed the proposal and is satisfied with the information submitted.

Bat Survey

A Bat Report was prepared by JBA Consulting. A Bat Survey was carried out on the site on the 4th of April 2025. As part of the preliminary bat roost assessment, all trees

within the proposed works area were inspected for their potential to support roosting bats. The report concluded by stating that *Overall, the site can be considered of low importance for bats as only a couple of Soprano Pipistrelles were recorded utilising the site for commuting and feeding purposes. The vegetation on the site is only used by a small number of commuting bats. The proposed development will not cause a significant impact to an important roost or sever a connection from any roost to their feeding grounds. Therefore, further surveys are not required. However, the following recommendations are included to support local bat populations: Retention of Linear Vegetation Features, Native Planting to Enhance Habitat Connectivity, Sensitive Lighting Design and Construction Lighting Controls.*

The Councils Heritage Officer has reviewed the proposal and the documents submitted and has stated that he agrees with the findings and recommendations of the mitigation measures outlined in the information submitted. Full report attached below.

Flooding

The southern part of the site is located within Flood Zone B. A Site Specific Flood Risk Assessment was prepared by Punch consulting Engineers and submitted with the application documentation. The Report states that *It was determined that the proposed development site is partially located in Flood Zone B for Coastal flooding. It is noted however, that the minimum surveyed site levels are above the CFRAMS predicted 0.1%AEP fluvial and coastal flood levels. The site will therefore not be inundated in such extreme flood events.*

Box 5.1 of the Justification Test has been applied, and it is concluded that the proposed development complies with the requirements.

The minimum proposed FFL at the site is 6.7mAOD. This is higher than the 0.5%AEP coastal flood level + 550mm climate change + 300mm freeboard. Flood mitigation measures have been proposed to reduce the risk to the proposed development and its users in the event of a flood, as described in Section 4.4 of this report, and to ensure that flooding elsewhere will not increase as a result of the development.

The mitigation measures proposed will ensure that the development is in compliance with the relevant sections of the LDP and The Planning System & Flood Risk Management Guidelines. The site is not within a flood zone as per the Council's GIS database.

The proposal is therefore considered acceptable.

8.0 Conclusion

Overall, the proposal is in accordance with the relevant policies and objectives of the Limerick Development Plan 2022-2028 as it will activate an underutilised city site and provide additional housing units within an existing city centre location. This is an infill site which is suitable for residential development, and overall, it is considered that the proposal will have a positive benefit for this location.

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 be proceeded with as proposed in the report to the Elected Members of Limerick City & County Council.



Mr. John Moran

Mayor

Limerick City & County Council

Date: 2 April 2026

Appendix 1 – Internal Reports

Heritage



Planning Application Internal Report

Planning Ref: PT8LL327

Applicant: LCCC

Development Description: Redevelopment of 48-50 Mary Street Limerick.

Report Prepared By: T O Neill Heritage Officer.

Comments: the proposed development is located 150m from the Lower River Shannon SAC site and is the redevelopment of an infill brown field site. It is a highly modified location and has been the subject of longstanding human activity.

Invasive Species Report: presence of Spanish Bluebell, Sycamore and Buddleia and other non-native species such as Red Valerian noted. The control measures on Section 4 (pages 13-16) of the report should be implemented to ensure control of these species.

Bat Report: A roost search was carried out on the 4th of April and an activity survey carried out at the correct time of year i.e. the 15th of May 2025. Noted that the site is used by a small number of bats for commuting and foraging but are not resident. The static detector survey for a period of five days confirmed this and recorded three species Soprano and Common Pipistrelle and Leislars. All of these are species commonly occur in an urban and urban fringe areas. The site-specific conservation measures mentioned in S.6 of the Bat Report (pp. 23 and 24) should be implemented where feasible.

AA screening: Agree with the findings. The works are not within the SAC site, are limited in scale and is located in a previously modified urban area which has a long history of human activity. Progression to stage 2 is not necessary.

Arborist report (p.11) noted that this is an opportunity to plant the site with trees that will enhance local biodiversity. Suggested species list includes those on the Table on p.4 of Conserving and Enhancing Wildlife in Towns and Villages: A Guide for Local Community Groups, which offer suggestions for differing types of location.

https://www.heritagecouncil.ie/content/files/conserving_enhancing_wildlife_guide_2005_480kb.pdf

Recommendation:

That permission be granted for this development., with the incorporation of bat friendly measures and biodiverse planting as recommended in the Arborists Report as outlined above.

Signed T O Neill Date: 19/2/2026

Conservation



O'Keeffe, Shona
To O'Brien, Ella

Reply Reply All Forward

Mon 23/02/2026 15:55

Hi Ella,

The architectural heritage impacts of the development have been given due consideration in the design process and the application documents.

I welcome the comments in the Conservation Report regarding stabilisation and remediation works and the proposed public realm works, to be developed in the detailed design stage. These works should include improving the setting of and access to the Protected Structure (the walls of the former Dominican Chapel), and should include appropriate signage/information.

The protection measures and remediation/stabilisation works to the wall should be designed and supervised by a suitably qualified conservation professional.

There is reference in the Conservation Report to a Structural Appraisal by Michael Flynn, C Eng (dated 8th December 2025) but I didn't see this in the application documents. This appraisal should be submitted to the Conservation section for record purposes.

Shona O'Keeffe
Executive Architectural Conservation Officer | Forward Planning, Urban Development and Heritage | Planning, Heritage and Ryder Cup Directorate
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