



**Mungret Residential Development**  
Planning Compliance Statement

---

Proposed Development at Dromdarrig, Mungret, Co. Limerick

January 2021

Application prepared with





**HRA | PLANNING**  
chartered town planning consultants

Title:	Planning Compliance Statement	
Project:	18021 Mungret Limerick 2030	
Prepared by:	Mary Hughes MIPI (Director)	
Signed:		
Date:	January 2020	
Issue:	Final	
<p>© Copyright HRA PLANNING. All rights reserved. This report has been prepared for the exclusive use of the commissioning party and unless otherwise agreed in writing by HRA PLANNING, no other party may copy, reproduce, distribute, make use of, or rely on the contents of the report for any other purpose. No liability is accepted by HRA PLANNING for any use of this report, other than for the purposes for which it was originally prepared and provided. Opinions and information provided in this report are on the bases of HRA PLANNING using due skill, care and diligence in the preparation of the same and no explicit warranty is provided as to their accuracy. It should be noted and is expressly stated that no independent verification of any of the documents or information supplied to HRA PLANNING has been made.</p>		

## TABLE of CONTENTS

1.0	INTRODUCTION .....	- 1 -
2.0	SITE LOCATION and PLANNING CONTEXT .....	- 1 -
2.1	Location .....	- 1 -
2.2	Existing & Planned Uses .....	- 2 -
2.3	Land Evolution & History .....	- 3 -
3.0	A MASTERPLAN APPROACH.....	- 4 -
4.0	NATURE & EXTENT OF DEVELOPMENT PROPOSAL.....	- 10 -
4.1	Description of the Proposed Development.....	- 10 -
4.2	Phasing .....	- 11 -
4.3	Net Developable Area .....	- 13 -
5.0	DEVELOPMENT PROPOSAL CONSIDERATION.....	- 15 -
5.1	General Design Approach .....	- 15 -
5.2	Residential Units .....	- 16 -
5.3	Ancillary Commercial Units .....	- 18 -
5.4	Creche & Community Facility .....	- 18 -
5.5	Public Realm & Open Space Provision.....	- 19 -
5.6	Access & Parking .....	- 20 -
5.7	Drainage Strategy .....	- 22 -
5.8	Energy Strategy .....	- 23 -
6.0	ENVIRONMENTAL APPRAISAL.....	- 24 -
6.1	Screening for Appropriate Assessment .....	- 24 -
6.2	Environmental Impact Assessment Screening .....	- 25 -
6.3	Biodiversity .....	- 25 -
6.4	Archaeology.....	- 26 -
6.5	Construction Environmental Management Plan.....	- 25-
7.0	PLANNING CONTEXT AND POLICY .....	- 27 -
7.1	National Planning Framework.....	- 27 -
7.2	Sustainable Urban Housing: Design Standards for New Apartments 2018 - 28 -	- 28 -
7.3	Sustainable Residential Development in Urban Areas Guidelines 2009.....	- 28 -
7.4	Regional Spatial and Economic Strategy for the Southern Region (RSES) - 29 -	- 29 -
7.5	Limerick County Development Plan 2010 - 2016.....	- 30 -
7.6	Southern Environs Local Area Plan 2011 - 2017.....	- 31 -
8.0	ASSESSMENT OF DEVELOPMENT .....	- 33 -
8.1	Principle of Development.....	- 33 -
8.2	Density .....	- 35 -
8.3	Connectivity and Accessibility .....	- 36 -
9.0	CONCLUSION .....	- 36 -

## **1.0 INTRODUCTION**

This statement has been prepared by HRA Planning Chartered Town Planning Consultants on behalf of Limerick City & County Council in support of a residential development on lands situate in the townland of Dromdarrig, Mungret, Co. Limerick.

This statement accompanies an application for approval made under Section 179 of the Planning & Development Act 2000 as amended for a residential development of 253 no. residential units comprising housing and apartment units with ancillary commercial units. The purpose of the report is to provide clarity on the nature of the development project, and to demonstrate how the proposed development is consistent with the planning policy and landuse development objectives for the area and specifically those contained in the existing Southern Environs Local Area Plan 2011 - 2017.

## **2.0 SITE LOCATION and PLANNING CONTEXT**

### **2.1 Location**

The 7.2 hectares site is located approximately 5km to the west of Limerick City Centre and 2km east of Mungret Village. Mungret is a priority area within the Limerick Metropolitan District and is a zoned urban extension of Limerick City under the Southern Environs Local Area Plan 2011 – 2017, as extended.

The site benefits from good access to the strategic road network. The site is surrounded by several roads including:

- Quinn’s Cross to Mungret regional road (R589) and by the N69 to the north;
- R510 road which extends from Quinn’s Cross to the Raheen roundabout; and
- R526 Raheen – Patrickswell regional road and by the Caher Road to the south.

Mungret Village is located north-west of the site containing a number of local shops and services including a post office, credit union, takeaway, barbers, dog grooming and the Westward Ho Bar & Grill. Connectivity between the lands surrounding Mungret College and Mungret Village has been enhanced through public realm improvements along the R859 and in Mungret Village centre, including the provision of cycle-paths and footpaths.

Two new primary schools have recently opened within the area accessed off the R859 to the west of Mungret College. A planning application was recently lodged for a new Mungret Community College School Building with capacity for 1,000 pupils. There is also the new Mungret Neighbourhood Park a significant public park, north of Mungret College.

The area has already been subject to development interest with new homes recently constructed at The Grange at Mungret Woods and north of the R859 at Sli Na Manach. Construction has commenced on a site for 203 no. homes accessed off the R510 to the south of Quinn’s Cross, north-east of the application site. This development also includes Phase I of

the proposed Link Street, which will ultimately provide access to the subject site. A further application was recently lodged for 66 no. units and is awaiting decision (P20/1195).



**Figure 1.0** Division of subject lands into identifiable plots A1 – A4

## 2.2 Existing & Planned Uses

The lands proposed for residential use are currently dominated by grassland with Mungret College Stables and Outbuildings, RPS No. 1658 1660 & 1661 protected structures, located on the north western boundary. The area is rich in history with a number of national monuments located in and surrounding the site including Mungret College Observatory (Seismic Station) immediately south of the Mungret Woods housing also listed as a protected structure and included on the National Inventory of Architectural Heritage

There is a cluster of housing, known as Mungret Woods, located adjoining the site to the north east and surrounding Plot A2. These houses are closest to the proposed development. Undeveloped zoned residential lands adjoin the southern, western and eastern site boundaries.

The land located immediately south of Mungret College is characterised by a series of temporary portacabins. These portacabins were granted a temporary planning permission under P17/357 with a condition that they be removed within a period of 5 years. Accordingly, these portacabins must be removed no later than June 2022.

Although there are no Tree Preservation Orders (TPO's) on the site, there are nonetheless a number of significant trees and hedgerows within the site which it is proposed to retain. A tree and hedgerow survey was undertaken in May 2018, which concentrated the significant trees and hedgerows located within the subject site. There is a line of Category A (high quality and value making a substantial contribution) trees along the northern site boundary of Plot A1 and A3 and a number of trees along the western boundary of Plot A2 which have not been classified.

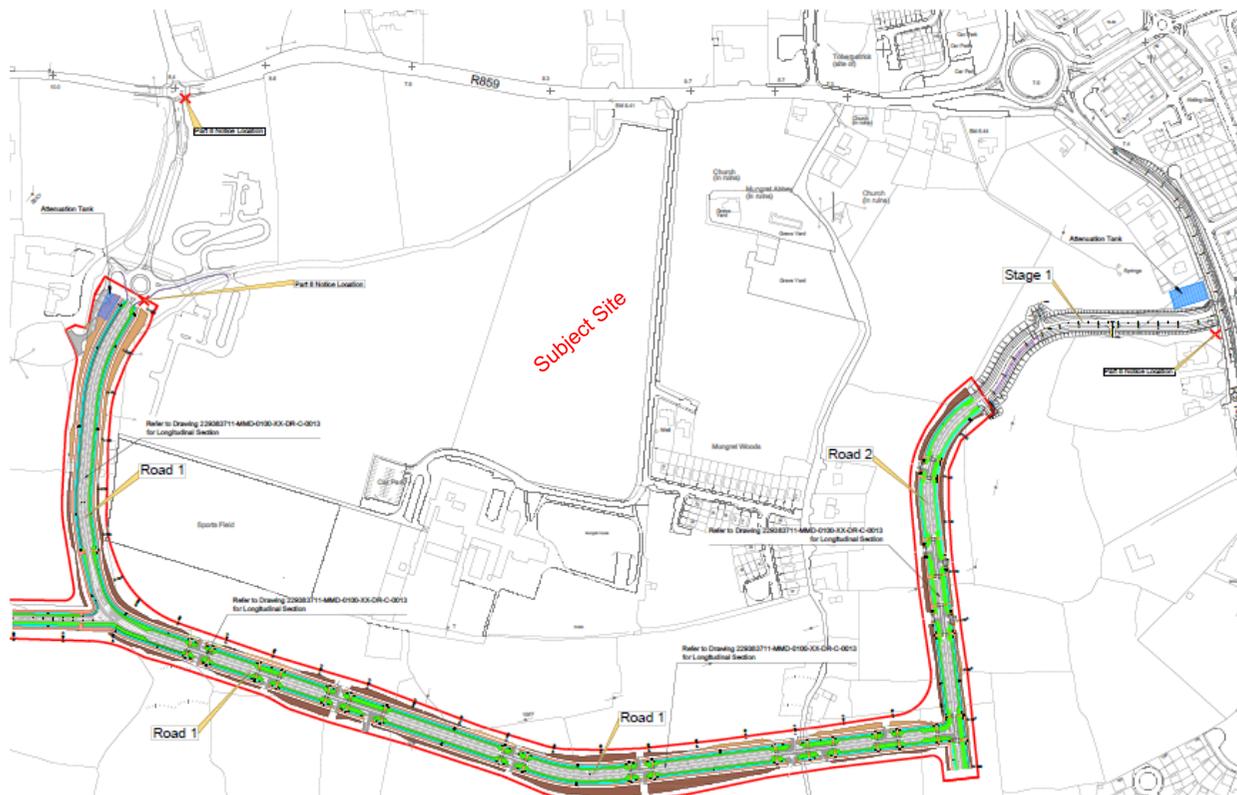
The overall landscape for the wider area is gently undulating with a general overall slope to the south. A ridge line runs roughly east to west through the north of the site. There are no protected views across the subject site. There is a protected view from Mungret College toward Mungret Abbey but this does not impact on the proposed development area.

### 2.3 Land Evolution & History

Planning permission was previously granted for 111 no. residential units in 2010 on part of the subject lands, with access to the 111 no. units from Mungret Woods (P09/767). The area adjoining Mungret Woods was similar to the development proposal with houses backing onto the existing housing already constructed.

The most recent permitted development in proximity to the site is that development currently under construction by Homeland and which is located north east of the application site with access off the R510 to the south of Quinn’s Cross. This development provides for 201 no. residential units and also provides for Phase I of the proposed Mungret Link Road.

A Part 8 application was granted consent for the construction of Phase II of the Mungret Link Road, as a continuation of Phase I, and which ultimately provides access to the subject lands (See Figure 2.0). This project is currently at tender stage with construction likely to commence in Q2 2021. It consists of the provision of ca. 1.7km of new public road. The purpose of the project is to accommodate the future construction of new residential development within appropriately zoned lands, including the application site. The proposed road will consist of a single carriageway road (6.5m carriageway road consisting of two lanes 3.25 meters wide), it will also include 2.5m wide parking bays, a delineation strip and 2.0m wide cycleways adjacent to a 2.0m footpaths



**Figure 2.0** Horizontal Layout of New Road Granted Consent and Providing Access to the Site

Planning permission was recently granted for the provision of a new secondary school south west of the subject lands with capacity to accommodate 1,000 pupils (P20/738). At present Mungret Community College operates from the Mungret College protected structure. However, once planning permission is secured and the new school is delivered, Mungret Community College will occupy this new site.

### 3.0 STRATEGIC DESIGN APPROACH

Objective MLO2 of the Southern Environs Local Area Plan 201 – 2017 (LAP) states it is an objective of the Council to facilitate the development of the area identified as the Mungret – Loughmore Opportunity Site in accordance with the masterplan outlined on Map 6 of the LAP and the policies and objectives set out in the Limerick County Development Plan and in this LAP. Objective MLO3 further states it is an objective of the Council to require developers to prepare detailed development proposals prepared by a suitably qualified person, with accompanying design statements showing how the design concepts are consistent with the Masterplan principles.

In response to both of these objectives in the LAP, the project design team prepared a high-level framework plan for the subject site and adjoining lands which were zoned for residential purposes and therefore are likely to be developed at some stage in the future. The Framework Plan extends across an area of 59.6 hectares of residential zoned land of which 27.1 hectares are owned by Limerick City and County Council (LCCC). It demonstrates how lands in Mungret can be developed in the future in a holistic and sustainable manner having regard to existing site characteristics and environmental factors.

The Framework Plan is focused on accommodating a defined vision for the Mungret lands which has evolved from an understanding of the place, its history and the people that have shaped it, its location and setting within the city and its landscape and outlook. Whilst the Framework Plan will deliver much needed housing for the city, the vision embedded in the Plan is about creating a vibrant neighbourhood that accommodates and facilitates a variety of uses and that nurtures a strong sense of community.

#### 3.1 Framework Plan Objectives

The vision for Mungret as detailed in Figure 3.0 & 4.0 is expressed through ten principles / objectives.

- To deliver an **exemplar new neighbourhood** with a clear identity and character that responds to the natural and historic environment and provides a **great place to live**
- To deliver a **green neighbourhood** that encourages **healthy lifestyles**, offering easy To create a strong and **legible structure** that leads people to a mixed-use centre at Mungret College, integrates the site with the wider area and strengthens existing centres
- To grow the existing **community hub** at Mungret College so that it forms a heart for the new neighbourhood and is accessible to all residents

- To protect and celebrate the sites **historic assets** including the College, Mungret Abbey and medieval ringforts
- To embrace the wider landscape and **create a green framework** across the site that retains the sites green assets and enhances biodiversity
- To create a **walkable and cycle friendly neighbourhood** that provides easy access to schools and amenities through a safe and attractive network of streets and paths
- To create a **legible network of streets** defined by new buildings and laid out as part of a clear hierarchy
- To incorporate **bus routes through the heart of the neighbourhood** reducing the need to travel by car
- To provide a **mix of high-quality homes** that give the opportunity to up or downsize within the neighbourhood

The Framework Plan is structured around the hub of Mungret College complex, with a north-south route connecting southward to the Link Street and onwards into the north-south linear park that extends through the development. The layout of development is structured around street blocks that provide a connected and permeable layout where streets are animated by dwellings fronting onto them and pedestrians and cyclists have a choice of routes to take. A public square, Mungret Square, provides a gathering space at the intersection of this route and the west to east Link Street. The Link Street will form the main movement corridor through the area and is also important to the structure and legibility of the place.

Mungret Square will be the most connected location in the neighbourhood, highly visible from the Link Street and benefiting from pedestrian footfall between the College, park and new homes. For this reason, the square is the best location for local retail and community provision. Mungret College is a protected structure and whilst it is just three storeys, the high floor to ceiling height and its elevated location looking across Mungret Neighbourhood Park means that it appears more substantial. The College and the assemblage of buildings adjacent to it are integrated into the structure of the plan and form an important centrepiece and hub for the wider area. The Framework Plan adopts a number of development principles that serve to strengthen this structure. These include:

- Promoting greater height for development along the Link Street, around Mungret Square and in the heart of the neighbourhood around Mungret College;
- Promoting continuous frontages in these central locations and along the Link Street; and
- Increasing the density of development in the heart of the neighbourhood and promoting development at lower densities in more peripheral areas.

The Framework Plan demonstrates how integrated development can occur in the future and illustrates how the proposed development will not compromise the future development or use of adjoining lands, in accordance with the proper planning and sustainable development of the area.



**Figure 3.0** High-Level Framework Plan Source: Urban Initiatives



**Figure 4.0** Street Hierarchy Source: Urban Initiatives

## 4.0 NATURE & EXTENT OF DEVELOPMENT PROPOSAL

### 4.1 Description of the Proposed Development

The proposal for approval with Limerick City & County Council under Section 179 of the Planning & Development Act 2000 – 2018 (the Act) is accompanied by detailed drawings and a detailed Architectural Design Statement, jointly prepared by EML Architects and Seán Harrington Architects, which provides a rationale for the design of the proposed scheme and the dwelling types proposed.

The proposed development has been comprehensively described in the public notices accompanying the submission on public display. A Site Layout Plan is detailed in Figure 6.0. A summary of the description and nature of development is provided hereunder:

- 253 no. residential units including 36 no. two bed houses; 110 no. three bed houses; 26 no. four bed houses; 2 no. six bed community dwellings; 37 no. two bed apartment units; and 42 no. one bed apartment units,
- House design will accommodate renewable energy design measures (which may be provided externally) for each housing unit;
- The residential units are structured such that (a) 146 no. houses and apartments are intended for private sale/rental; (b) 50 no. houses and apartments are affordable units intended for private sale/rental; (d) 2 no. detached units are intended as community dwellings; and (e) 55 no. apartments are intended as Independent Living for Older Persons of which 25 no. apartments are intended as Social – Rental units;
- A crèche facility with capacity to accommodate 70 no. children and a community facility with ancillary café of 35sqm net floor area;
- 2 no. local retail and retail service units, of 80sqm net floor area each situated fronting the public square and positioned within the Independent Living for Older Persons complex.
- Public toilet;
- Public Square of 0.2 hectares adjoining the Older Persons Housing units;
- Associated site and infrastructural works including water services, foul and surface water drainage and associated connections and attenuation proposals including permeable paving and swales;
- Landscaping works including (provision of playground and kick about areas and new pedestrian and cycle connections);
- Repair works are proposed to the Observatory (Seismic Station) (RPS No.1658) located within proposed open space within the site.
- All associated and ancillary site development and infrastructural works including 4 no. ESB substations, hard and soft landscaping and boundary treatment works.

- The development will be accessed from the proposed Mungret Distributor Road with 5 no units only, accessed from the existing Mungret Woods Housing Development. R

#### 4.2 Phasing

It is anticipated that construction will commence on site in Q4 2021 subject to the discharge of any pre-commencement requirements.

It is intended to deliver the development in the shortest timeframe possible. Based on contracting market feedback to date, an overall construction duration of circa 5 years would be reasonably achievable. The phasing plan detailed in Figure 7.0 provides for three phases of development over a period of 5 years and the estimated timeframes for each phase is detailed in Table 1.0.

Phase	Extent of Development	Approx. Timeframe
Phase 01	55 no. Independent Living for Older Persons Units inclusive of 25 no. Social – Rental units	18 months
	54 no. Residential Units	
Phase 02	56 no. Residential Units	18 months
	12 no. Residential Units, Creche & Community Centre	
Phase 03	39 no. Residential Units	24 months
	37 no. Residential Units	

**Table 1.0** Proposed Phasing of Development

The timeframes provided are indicative only and there is likely to be overlap between phases. Generally, the foundation and structural works of each phase is likely to proceed at the same time as the fit out and commissioning of the previous phase. It should be noted that the existing portacabins on part of the site, south of Mungret College, currently located where the community and creche facility are proposed, are to be removed from the site no later than June 2022 in accordance with condition no. 3 of the planning permission granted (P17/357) which authorised their temporary provision and use. This timeframe is well in advance of Phase 02 which is not likely to commence until Q2 2023 and which will necessitate their removal to facilitate construction of the creche and community building.

The phasing plan as proposed is relevant to the current market and economic climate. Should the current market significantly shift, then a revised phasing approach may be necessary.



Figure 5.0 Site Layout Plan – Source: EML & SHA Architects

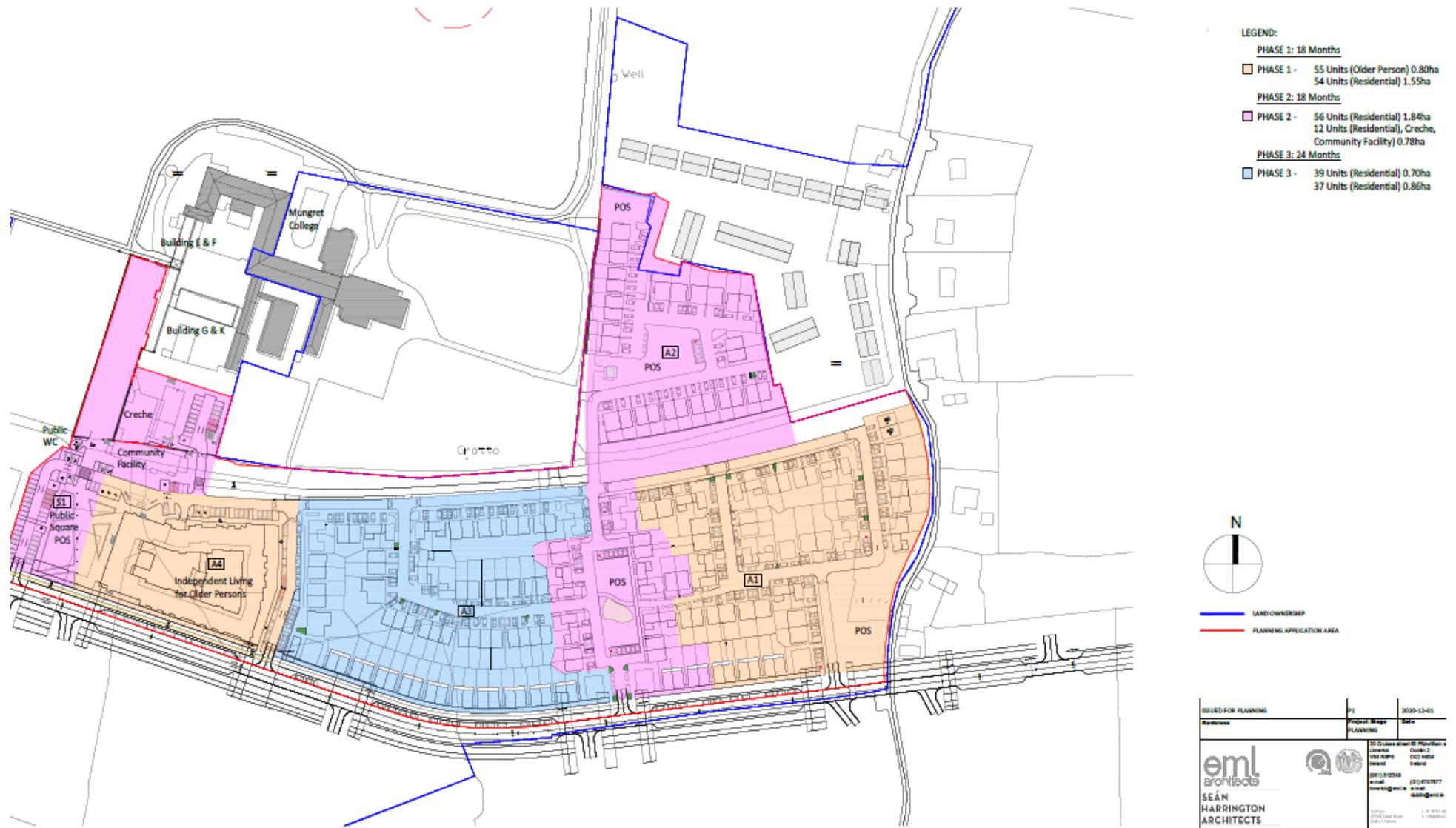
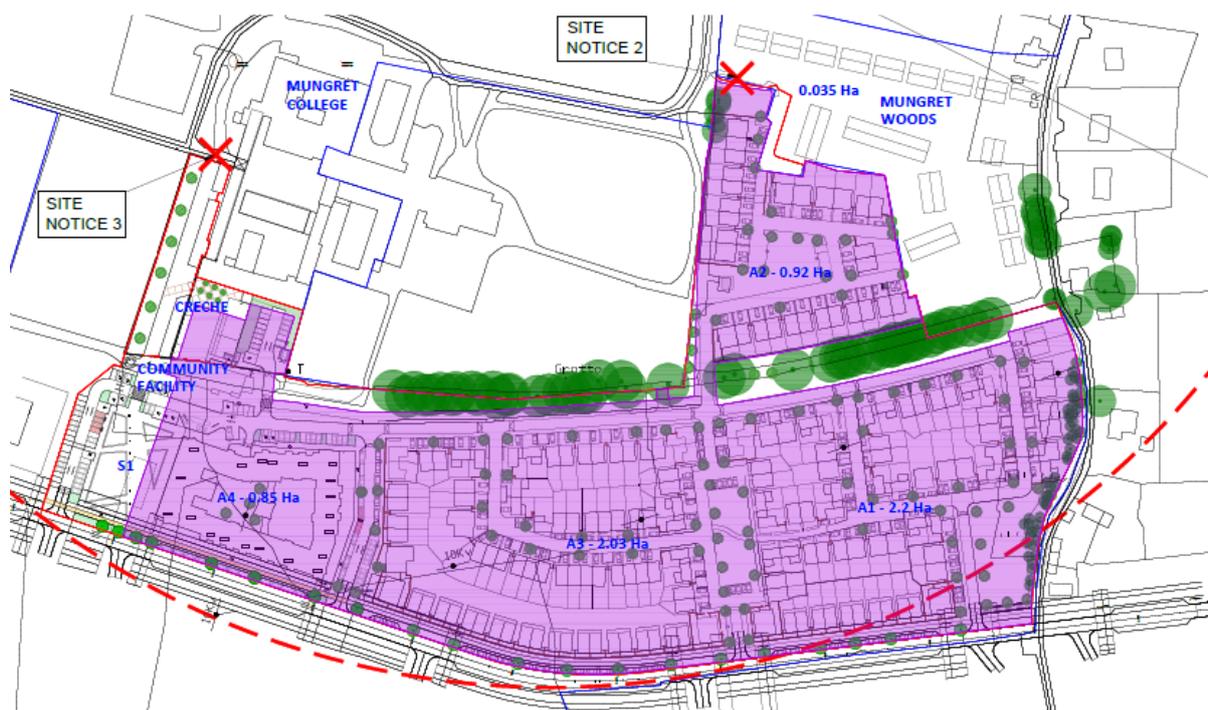


Figure 6.0 Indicative Phasing Plan

### 4.3 Net Developable Area

Notwithstanding that the subject site as outlined in red comprises 7.2 hectares, the net developable area has been calculated at 6.1 hectares, identified in purple in Figure 7.0 below. The net developable area is represented to facilitate density calculations. It excludes that part of the site that cannot be developed for housing including significant tree stands and hedgerows along the northern site boundary of Plot A1 and A3. It also excludes the pedestrian access from the public square to Mungret College; and part of the public square which is in excess of the public open space requirements in the Southern Environs Local Area Plan.



**Figure 7.0** Net Developable Area

The net developable area includes 0.46 hectares of public open space required to service the development, which represents 7.5% of the net developable site. When this area is considered in conjunction with the remaining proposed public square and the extensive areas of green space located alongside and under the existing trees and hedgerows, the total open space provision within the development site increases to 1.6 hectares. This represents 14.6 per cent of the overall (gross) site identified in red.

### 4.4 Development Statistics

The number of units proposed within the overall development seeks to comply with guidelines on density at national and regional level, in accordance with the provisions of local policy as detailed in the Southern Environs Local Area Plan 2011 – 2017, as extended (LAP). The proposed development results in a net residential density of 41 no. units per hectare based on a net site area of 6.1 hectares.

Development Statistics	Gross	Net
No. of Residential Units	253 units	
Gross Site Area	7.2 hectares	6.1 hectares
Density	35 units per hectare	41 units per hectare
Gross Floor Area	27,227sqm	
Building Height	2 - 3 storeys	
Public Open Space	1.6 hectares (14.6%)	0.46 hectares (7.5%)

**Table 2.0** Development Statistics

## 5.0 DEVELOPMENT PROPOSAL CONSIDERATION

### 5.1 General Design Approach

The apartments and residential units have been designed in accordance with national guidance including the Sustainable Urban Residential Development – Guidelines for Planning Authorities and the accompanying Urban Design Manual, DEHLG, May 2009; and the Sustainable Urban housing: Design Standards for New Apartments.

Residential blocks have been distributed across the site with a focus on permeability and accessibility throughout and within the scheme, in accordance with the masterplan objectives detailed in the LAP including ML04, 05 & 06. The 'anchor' for the development is the proposed Link Road, yet to be constructed, but which has received approval for construction. The development fronts onto this road, with three storey units providing an active streetscape. Medium density is proposed generally within the scheme (Sites A1, A2 & A3), reflective of existing and permitted housing development in the area, with higher density development located to the west, south of Mungret College (Site A4).

The proposed development has sufficient variety in scale and form to respond to the scale of neighbouring 2 and 3 storey developments. In this regard the proposed development generally maintains the existing scale, including the apartment complex comprising of Independent Living for Older Persons units and the creche and community building. The proposed development has been designed to ensure that individual streetscapes within the development are bookended in so far as possible, thereby accommodating legibility within the site and contributing towards enhanced urban design within the overall scheme.

The design of the scheme adopts an efficient grid-type urban form in accordance with the principles of the Design Manual for Urban Roads & Street (DMURS). A new public space is proposed at the heart of the community that creates a unifying urban focus for the development. The Square, which is intended as a 'link' with Mungret College is flanked by the courtyard apartment block to the east and by the creche and community building to the north. As detailed in the overall masterplan proposal for the site, the Square will be flanked by future development to the west. A pedestrian access route to Mungret College to the north ensures that the College and any associated future uses are integrated within

the overall residential development. A comprehensive landscaping masterplan prepared by NDJ Associates accompanies the development proposal.

## 5.2 Residential Units

The massing and distribution of residential units across the site has responded to Objective MLO2 in the Southern Environs Local Area Plan 2011 – 2017 (LAP) and the Masterplan principles detailed in Map 6 of the LAP. These masterplan principles were translated into an overall Framework Plan for the subject site and adjoining lands as previously detailed in Section 3.0 of this report.

The proposed development provides for 253 no. units and will provide for a mixed-tenure development, facilitating units for sale, social housing and rent as detailed in Table 2.0 across a range of unit sizes, detailed in Table 3.0. The range and mix of units will ensure that the proposed development caters and provides for different household typologies in a sustainable and community-based manner.

Tenure	Unit Format	Unit Type	No. of Units	% Tenure Breakdown
Private	Private Sale / Rental	Houses & Apartments	146	57%
Affordable	Affordable Sale / Rental	Houses & Apartments	50	20%
Social	Community Dwellings	Houses	2	23%
	Independent Living for Older Persons inclusive of 25 no. Social – Rental Units	Apartments	55	

**Table 3.0** Mixed Tenure Development Proposal

Unit Size	Detached	Semi Detached	Terraced	Apartments	Total	% Mix of Overall Development
1 bed	0	0	0	42	42	16.6%
2 bed	0	22	14	37	73	28.8%
3 bed	0	107	3	0	110	43.5%
4 bed (+)	3	25	0	0	28	11%
Total	3	154	17	79	253	100%

**Table 4.0** Unit Size and Number Across Entire Development

The development comprises 174 no. houses and 79 no. apartments. The apartments are split across three different parts of the scheme including the large Apartment Block comprising 55 no. units intended for Independent Living for Older Persons; 12 no. units situated over the creche and community building; and 12 no. apartments distributed around the housing scheme comprising predominantly corner blocks.

The Independent Living for Older Person units are arranged over 3 storeys including the ground floor comprising a variety of common use areas, administration office, consulting room, beauty salon, local retail unit and, 1 and 2-bedroom units. All apartments are reachable via lifts and stair cores and are therefore accessible to disabled people. Internally the block includes a recycling area and a bicycle store for 18no. bikes. 18no. secure visitor bicycle parking spaces are also provided to the front of the building.

The building is designed around a landscaped courtyard for community use by the residents with communal spaces on the ground floor. Sited on the public square (S1) square leads up to the existing Mungret College, park, and amenity facilities with a new proposed creche and community building across the road located at the ground floor.

Over the creche and community building there are 12 no. apartments. The building is 3 storeys in height to match the Independent Living for Older Persons block and designed to enclose the public square and front the public access route leading to Mungret College, Mungret Park and the village beyond. The apartments are located on the first and second floors with 5 no. apartments on the first floor and 8 no. apartments on the second floor. The apartments are orientated to face south and west to minimize overlooking of the creche areas on the ground floor to the east and the north. A designated parking area is located to the rear of the block with 16no. bays and a secure bicycle store for 12no. bicycles. A standalone waste and recycling store is also proposed. This area is accessed through a private gate with visitor parking bays located to the front of the building. The rear parking area is separated from the creche play area by a 2.1m high boundary fence and a green strip including a line of trees. Private amenity space is provided to each apartment with a balcony and these are located to maximise orientation to the south and west.

There are four proposed apartment buildings which will be comprised of 3no. apartment units each. These are arranged over 3 storeys with a single storey two-bedroom apartment above 2no. two-storey two-bedroom duplex apartments. The top floor apartment has own door access at street level with an internal stairs suitable for ambulant disabled people. There are no lifts in the buildings. This has the effect of significantly reducing the maintenance and management burden on the owners and residents of these small blocks. The apartment blocks are interspersed into the greater scheme of two and three storey houses, and to further integrate them into this context, each apartment has own-door access and its own private outdoor amenity area at ground level, which provides space for refuse & recycling storage, renewable energy installations, and bicycle storage.

There are 2 no. 6 bed community dwellings dispersed throughout the proposed development, intended as a shared living space for people with disabilities and their carers, including those transitioning from a congregated setting. Provision of these units within the development ensures a less institutional environment more in keeping with the domestic nature of typical dwelling units

### 5.3 Ancillary Commercial Units

Two small retail units and a cafe are proposed within the development proposal with net floor areas of 80sqm each for the retail areas and 35sqm for the café. Both of the retail units are located beside each other at ground floor level within the Independent Living for Older Persons Units and fronting onto the proposed new Urban Square. The units are intended to overlook and naturally police the Urban Square and are intended to facilitate social and community interaction.

It is intended to operate a hairdressers / beauticians from one of the units. This unit has dual access within the apartment complex and out onto the Square. The operation is intended to primarily service the residents of the Independent Living for Older Persons Units. It is noted that the Retail Planning Guidelines (2012) support the provision of local retail units as they provide access to local facilities especially the elderly, persons with mobility impairments, families and those without access to private transport.

The second unit is located at the corner of the Urban Square and the Link Road and is intended to function as a local shop / newsagents. It is not intended as a destination, but rather is intended to function as a top-up shopping facility (selling milk, newspapers etc) and as a gathering space for the residents.

The café, which is ancillary to the community centre is intended to animate the corner of the building and to front onto the public square and walkway to Mungret College.

### 5.4 Creche & Community Facility

The proposed creche facility of 476.2sqm has capacity to accommodate 70 no. children and 13 no. staff and has been sized to serve the development proposal. In accordance with the Childcare Facilities - Guidelines for Planning Authorities, provision has been made for in excess of the 20 no. childcare spaces per 75 no. residential unit requirement. The creche facility will operate Monday to Friday from 7.30hrs to 19.00hrs. Adequate parking for the creche has been provided around the Square.

The 289sqm community facility will complement the functional operation of the creche. It will be a managed facility with a dedicated booking system to ensure coordination across a range of societies, clubs and organisations.

The location of this building, inclusive of the apartments overhead, has been sensitively positioned alongside the established stone walls which form part of the curtilage of Mungret College Protected Structure. The building has been sensitively positioned away from the college and its outbuildings thereby enabling future works around the college. Further the positioning of the building ensures that existing access through the stone wall to the outbuildings can continue to be facilitated.

A Conservation Report has been prepared by EML Architects and accompanies the development proposal. The Conservation Report has regard to the positioning of the

building relative to the stone wall and the minor repair measures proposed to ensure the integrity of the wall structure into the future.

### 5.5 Public Realm & Open Space Provision

The development proposes the creation of a series of urban and landscaped public spaces. In accordance with Objective ML09 of the LAP, the development accommodates 7.5% of the net developable area (6 hectares) as public open space, having regard to the location of all residential units within 400m of Mungret Neighbourhood Park. These include:

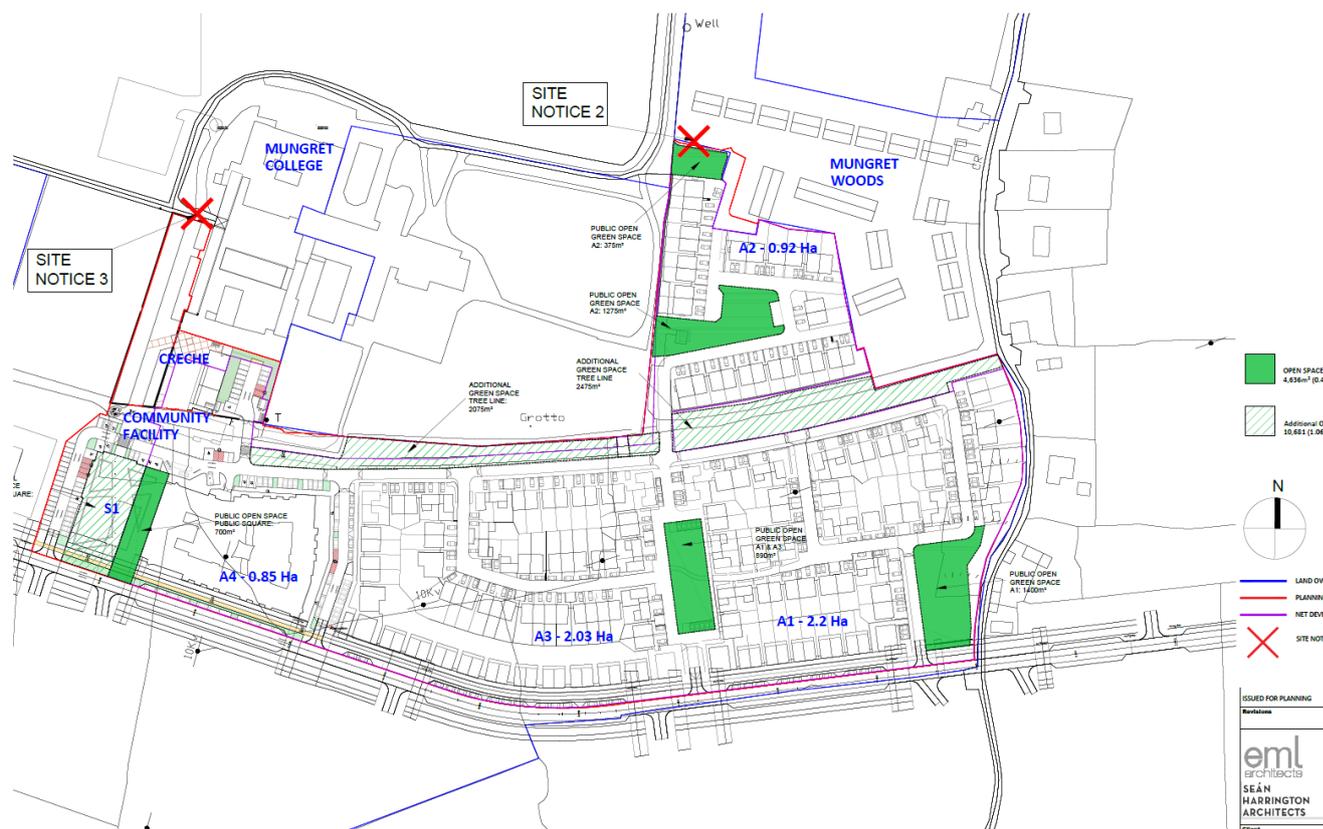
1. The provision of 3 no. pocket parks providing for localised play, including open space to the north, east and centrally within the development proposal. These pocket parks are supplemented with play equipment. In accordance with Objective C2 in the LAP, the pocket parks have been located such that all houses are situated within 100m walking distance of such parks.
2. A pedestrian pathway and cycleway are provided along the northern site boundary providing a link between the residential development and the new Urban Square and community facilities including the creche. This provides for clear connectivity within the development.
3. Retention and enhancement of existing mature trees and hedgerows along the northern and eastern site boundaries.
4. Provision of a new urban square to the west. The Square is a new public space at the heart of the community that creates a unifying urban focus for the development.

The Landscape Architecture Design Report prepared by NDJ & Associate, contained within the Architectural Design Statement, provides a comprehensive presentation of the proposed external works for the subject site. The design approach illustrates the design development and intent in conjunction with the vision, policies and objectives as identified within the LAP (Objective MLO12 & MLO9). Furthermore, the design approach sets out the design principles that form the proposed intervention which include:

- Multi-modal connectivity;
- Amenity through variety;
- Resilience in design; and
- Landscape character.

Having regard to the proximity of the subject site to Mungret Neighbourhood Park (see Figure 11.0), the proposed development provides for 7.5% of public open space within the net developable site area and 14.69% within the gross site area (red line boundary).

Figure 8.0 below details the different open space provision, with the solid green areas providing functional open space necessary to satisfy the 7.5% open space requirement in the LAP. The green hatched areas are the additional open space provided over and above that required in the LAP and which cannot be used for active recreational purposes and which increases overall public open space to 14.69%.



**Figure 8.0** Open space Provision

## 5.6 Access & Parking

### Access

Vehicular access to the development will primarily be from the proposed Mungret Link Road with 5 no units only, located at the northern extremity of the site, accessed from the existing Mungret Woods Housing Development. A Traffic & Transport Assessment (TTA) has been prepared by MHL Traffic Consultants and accompanies the application.

Phase I of the Mungret Link Road has been completed. This section of the Link Road provides access to the R510 to the south of Quinn’s Cross. Phase II of the Link Road received consent in recent months via the Part 8 process and is currently at tender stage. It is anticipated that work will commence on the road in Q2 2021. It is anticipated that the Link Road will be constructed prior to the occupation of the proposed units.

### Parking

The car parking strategy for the site follows the standards set out in the Limerick County Development Plan 2010 – 2016, as amended (CDP) and was agreed in principle with the Traffic & Transportation Section. A total of 372 no. car parking spaces have been provided to support the development proposal and this is in general conformance with the 374 no. spaces required as per the car parking requirements in the County Development Plan (See Tables 5.0 & 6.0). The parking strategy for the housing and apartment units on A1 – A3

is different to that for the Independent Living for Older Person Units on A4 and the 12 no. apartment units positioned over the creche and the community building.

Car Parking Breakdown Site A1 – A3

Car Parking for A1 to A3 provides for a total of 274 no. car parking spaces including 1 car parking space per 3 bed unit or less and 2 car parking spaces for 4 bed or more with 1 visitor car parking space provided per 3 no. houses as detailed in Table 5.0. A balance of on site curtilage parking (145 no. spaces), on-street assigned parking (78 no. spaces) and visitor parking (54 no. spaces) is provided throughout the development. Those residential units proposed with no on curtilage car parking will be reserved a dedicated / demarcated parking space on the street in close proximity to the unit.

Although this particular part of the development is shown as being deficient in the provision of 4 no. car parking spaces, it should be noted as per Table 6.0 below that two additional spaces are provided within the remaining development proposal (Independent Living for Older Persons Units creche, community centre and apartments), thereby resulting in an overall deficiency of 2 no. spaces only which is considered to be immaterial, particularly having regard to the public transport proposals envisaged for the area as detailed in the Draft Limerick Metropolitan Area Transport Strategy and in particular having regard to the proposed Quality Bus Corridor (QBC) which will front the site (on the proposed LIHAF Road).

Unit Size	No. of Units	Car Parking Standard	No. of Spaces Required	No. of Spaces Provided
3 beds or less	146	1 space per unit	146	146
4 beds or more	28	2 spaces per unit	56	56
2 bed apartments	12	1 space per unit	12	12
Visitor Houses		1 space per 3 no. houses	58	54
Visitor Apartments		1 space per 2 no. apartments	6	6
Total Car Parking Spaces			278	274

**Table 5.0** Car Parking Calculations A1 – A3

Car Parking Breakdown Site A4

A different approach is adopted for site A4 accommodating the Independent Living for Older Persons Units, creche, community centre and apartments. Given the nature of the Older Person Units, the vast majority of occupants will not have cars. In collaboration with the Housing Body intended on managing the residential units, the focus is on providing visitor parking with on street parking for a number of residential units. A total of 82 no. on-street car parking spaces are provided to serve A4 including the Older Person Residential units, the retail units, the creche and the community facility. The apartment units over the creche and community centre have their own dedicated and secure parking, located immediately east of the building and accommodating 16 no. car parking spaces.

The breakdown for each type of unit is detailed in Table 6.0. Importantly the apartments, creche and retail units are provided with full car parking in accordance with development plan standards, whilst reduced parking at a rate of 0.74 spaces per unit is provided for the Older Persons Apartments. The car parking strategy for this section of the development was agreed in principle with the Traffic & Transport Section.

Type	No. of Units	Car Parking Standard Applied	No. of Spaces Required	No. of Spaces Provided
Elderly Units	55	0.74 space per unit	41	41
2 & 1 bed apartments	12	1 space per unit	12	12 Secure Spaces
Visitor Apartment	12	1 space per 2 units	6	4 Secure & 2 on Street
Creche	13 staff plus 70 children	1 space per staff plus 1 per 5 children	27	27
Retail Units	195sqm gross	1 space per 20sqm	10	12
Total Car Parking Spaces			96	98

**Table 6.0** Car Parking Calculations A4

Cumulatively, the development site comprises a total of 372 no. on-curtilage and on-street car parking spaces. A total of 38 no. electric vehicles charging points will be provided on site and 16 no. accessible bays. Communal car parks will be planned to accommodate the infrastructure to facilitate the future roll-out of EV charging facilities to each parking bay, but with an initial roll-out to connect a portion of the available parking facilities.

### Bicycle Parking

The Limerick County Development Plan 2010 – 2016 requires the provision of 1 no. space per house and apartment unit and 1 no. space per 50sqm of retail provision. Provision has been made for 92 no. bicycle spaces on site in addition to on curtilage bicycle parking for the 174 no. houses and the 12 no. apartment units with own door access. Overall, the bicycle parking provision on site is in excess of Development Plan requirements.

The 55 no. Independent Living for Older Persons Units are provided with 56 no. bicycle stands including 18 no. covered spaces and 38 no. external rails. The 12 no. apartments overhead the creche and community building are served with 12 no. covered spaces within the gated parking area. A total of 10 no. dedicated bicycle stands are provided to serve the creche facility with 14 no. bicycle stands provided to serve the community centre, local retail units and to provide for additional visitor spaces.

## 7.7 Drainage Strategy

The drainage strategy is focused on meeting the requirements of Irish Water and Limerick City & County Council Water Services Department in terms of design, arrangement and clearances to other infrastructure. Implementation of the drainage strategy is dependent

on delivery of the Link Street and its associated pipework. All drainage works shall be complete prior to the occupation of any unit within the proposed development.

#### Foul Water

There is an existing 225mm dia foul water sewer serving Mungret Community College and a similar sized foul water sewer serving Mungret Woods. It is proposed to connect into both of these sewers. Further, a 225mm diameter foul water sewer is proposed for Link Street. This sewer will be set sufficiently deep to allow for future connection to the proposed development.

#### Surface Water

There is an existing 225mm diameter surface water drain serving Mungret Community College and an existing 500mm diameter surface water drain serving Mungret Woods residential development. A surface water drain is proposed as part of the Link Street, which will be set sufficiently deep to allow for future connection to the proposed development, and will be sized to take runoff from our development at a rate of 2.86 l/s/ha.

Sustainable Urban Drainage Systems (SuDS) will be implemented for each block of the proposed development. This will ensure the at Best Management Practices will be used for the urban storm water drainage. Attenuation at source will be the over-riding objective.

#### Water Supply

There is an existing potable water supply serving both the existing Mungret Community College to the north west of the site and the existing Mungret Woods residential development to the north east of the site. It is proposed to connect into these supplies. Further, a potable water supply is proposed to the south of the site as part of the Link Street design, which will serve the majority of the site.

### 8.8 Energy Strategy

An Energy Statement Report has been prepared by ARUP. The strategy for sustainable design uses robust, passive, cost effective measures to create a more efficient and healthier environment within the planned spaces. The development provides an opportunity to create environmentally sound and energy efficient homes by using an integrated approach to design, planning, construction and operation in accordance with the principles established in the LAP and detailed in Objective MLO5.

The design strategies employed include a whole life cycle approach to management and planning of the development, energy efficiency with specific focus on reducing the carbon footprint, improving the environmental quality of the building spaces, material selection and use, waste management, water management and conservation and enhancing the ecological value of the site. A Part L Compliance Report has been prepared by ARUP. Key Energy Reduction and Sustainable Design Features include:

- BER minimum of A3, with the majority of units achieving a BER of A2.

- Reduction in Primary Energy below the regulatory requirement and when compared to a Building Regulation Compliant Residential Building under Part L.
- Reduction in CO2 Emissions below the regulatory requirement and when compared to a Building Regulation Compliant Residential Building under Part L.
- The target Air Permeability Level for the housing is 3m<sup>3</sup>/m<sup>2</sup>/hr @50Pa as opposed to the Part L compliant value of 5m<sup>3</sup>/m<sup>2</sup>/hr@50Pa
- Use of LED Lights in the residences and in the Landlords areas.

To achieve the renewables requirement stipulated in TGD Part L, a number of different renewable systems will be considered immediately prior to construction including the provision of Air to Water Heat Pumps, roof mounted solar panels and / or solar thermal installations. The exact systems to be implemented for each house are not yet known. Accordingly, flexibility is required within the planning consent to facilitate implementation of such measures at a later date and prior to commencement of construction.

Two dedicated ESB sub-stations will be sited in the development to power the entire site. The supply to all buildings, landlord and tenant services will be at low voltage. One substation has been integrated into the eastern elevation of the Independent Living for Older Persons Units, whilst the other substation is location to the north of the site within defined green space.

## 5.9 Conservation Strategy

As detailed in Section 5.4 of this report previously, a Conservation Report has been prepared by EML Architects and accompanies the development proposal. The Conservation Report focuses on the main building of Mungret College located outside of but adjoining the site and describes how the proposed development will not impact on the college in accordance with the principles of Objective MLO10 which seek to preserve Mungret College protected structure.

The Conservation Report also focuses on the historical Observatory which is both a protected structure and recorded monument and is located within the subject site. This structure, located within a proposed open space serving the development, will be repaired and preserved in accordance with Objective EH5 in the LAP. A Method Statement for these repair works is presented in accordance with the principles of Objective ML010 of the LAP.

## 6.0 ENVIRONMENTAL APPRAISAL

The development strategy and design approach has been influenced by a number of environmental variables and considerations on the site.

### 6.1 Screening for Appropriate Assessment

A Screening for Appropriate Assessment report has been prepared by ARUP. The Loughmore Common turlough pNHA while not a SAC is potentially a groundwater-

dependent habitat. The potential for karst-related features in the bedrock creating a potential hydrological/hydrogeological connection between the proposed development and Loughmore Common has been investigated, including the potential for Loughmore Common providing suitable winter habitat for Lapwing and Golden Plover (both of which are Qualifying Interests of the River Shannon and The River Fergus Estuaries SPA). These considerations are addressed in detail in the report for screening for Appropriate Assessment, which concludes that the proposed development will not have adverse effects on Natura 2000 sites. and that a Natura Impact Statement is not required.

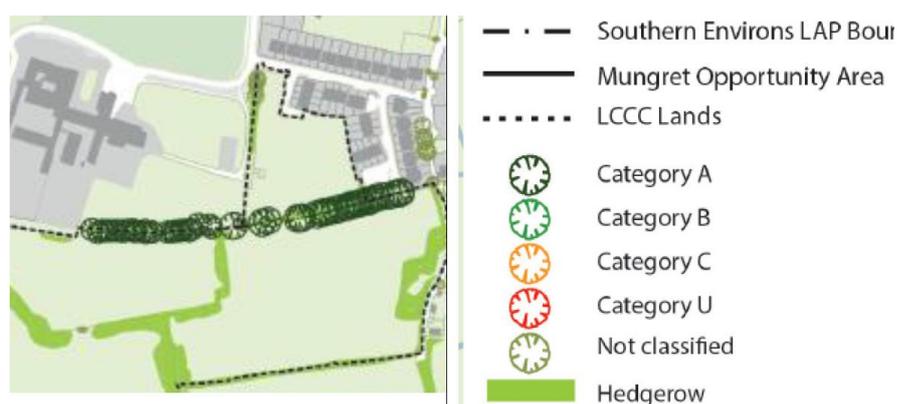
## 6.2 Environmental Impact Assessment Screening

Environmental Impact Assessment Screening has been undertaken by ARUP to assist in determining whether any aspect of the development is likely to have significant adverse effects on the environment. The report confirms that the proposed development does not meet the requirements of Class 10 (b)(i) and Class (b)(iv), so a mandatory EIA is not required.

In addition, it concludes that significant effects on the geographical area in which the works are proposed are unlikely, with regards to absorption capacity of the natural environment. It also concludes that significant effect on the environment in which the works are proposed are unlikely in terms of population and human health, biodiversity, landscape and visual, groundwater-dependent features and air quality. It concludes that the proposed development is unlikely to have significant adverse effects on the environment.

## 6.3 Biodiversity

A Tree and Hedgerow Survey was carried out by Arbocare in May 2018, which concentrated on the significant trees and hedgerows located within the subject site. The survey identified the location of trees and hedgerows and their quality. There is a line of Category A (high quality and value making a substantial contribution) trees along the northern boundary of plot A1 and A3 and a number of trees along the western boundary of Plot A2 which have not been classified (Refer to Figure 9.0 below). None of the trees are protected by a Tree Preservation Order (TPO). Irrespective, it is proposed to retain this tree and hedgerow line in so far as possible within the development proposal in accordance with the principles of Objective MLO12 in the LAP.



**Figure 9.0** Tree & Hedgerow Survey

Specifically, the Arboricultural Impact Assessment confirms that the arboricultural impact of the development is low, with only three trees out of forty three trees requiring removal. It will also require the complete removal of a number of hedgerows. There is an extensive landscape plan that will plant the site with appropriate trees which will enhance the arboreal footprint of the site.

#### 6.4 Archaeology

An Archaeological Test Trenching Report has been prepared by Aegis Archaeology. The test trenching was undertaken in October 2019. Twenty-one trenches were excavated across the area of the proposed development. No archaeological features were identified.

There are no archaeological monuments within the proposed development area. Mungret Observatory (Reg. No. 21901314) located within Site A2 is listed as a protected structure on the National Inventory of Architectural Heritage (NIAH) and is identified as a protected structure within the LAP. It is proposed to retain and preserve this feature as part of the development proposal. Part of the former Mungret Agricultural College, neighbours the subject site with the proposed creche and community building located within the curtilage of the College. These buildings are listed on the Record of Protected Structures (RPS No. 1658 1660 & 1661). It is proposed to modify the existing stone wall surrounding the college to facilitate integration of the creche and community building including removal of a section of the wall, rebuilding and repair.

A Conservation Report has been prepared by EML Architects in respect of the College, which provides a survey of the wall adjoining the site and describes the proposed works to be undertaken in the context of best conservation practice. It is not envisaged that the proposed development will result in significant effects on archaeology and architectural heritage.

#### 6.5 Construction Environmental Management Plan

A Construction Environmental Management Plan has been prepared by ARUP to accompany the application. This report provides the environmental management framework to be adhered to during the pre-commencement, construction and operational phases of the proposed development and it incorporates the mitigating principles to ensure that the work is carried out in a way that minimises the potential for any environmental impacts to occur.

Should the project secure consent, the CEMP will be updated, in line with all conditions and obligations which apply to any grant of permission. The CEMP should be read in conjunction with the EIAR Screening Report and planning drawings. The CEMP will also require updating by the selected contractor in order to identify, assess and satisfy the contract performance criteria as set out by the various stakeholders. The CEMP due to its structure and nature will also require constant updating and revision throughout the construction period as set out below. Therefore, this is a working document and will be developed further prior to and during construction.

## 7.0 PLANNING CONTEXT AND POLICY

The proposed development has been carefully considered and designed in the context of national and local guidelines and planning policy

### 7.1 National Planning Framework

The National Planning Framework (NPF) published in February 2018 sets out a strategic development strategy for the country up to 2040. Amongst its key messages is the need to provide the highest possible quality of life for people and communities via well designed and managed built and natural environments. It highlights that this will also require significant greenfield development, on sites that can be integrated with the existing built up area of the city and serviced by high capacity public transport. The NPF sets high level planning objectives for Limerick in order to meet the national objectives. The emphasis within the NPF with regard future development relates to managing the sustainable growth of compact cities, towns and villages to achieve effective density and consolidation supported by effective public transport infrastructure.

The NPF provides for a number of National Policy Objectives (NPO) which must be adhered to in the advancement of development throughout the State. The NPF seeks to *"deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements"* (NPO 3a) and seeks to *"deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints"* (NPO 3b).

The NPO's promoting consolidation are further supported by NPO 11 which states that *"in meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth"*.

The infill/brownfield targets set out in NPOs 3a, 3b and 3c of the NPF recognises the necessity for significant and sustained increase in urban housing output and in particular apartment type development. The NPF states that this is necessary, in order to avoid a continuation of the outward expansion of cities and larger urban areas. The NPF states that *"in many European countries, it is normal to see 40%-60% of households living in apartments"*.

NPO 33 seeks to *"Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location."*

The proposed development complies with a number of the NPO's within the NPF with particular regard to development within the existing built up footprint of a settlement. The proposed development is strategically located on residentially zoned greenfield lands. The site is serviceable and will be well connected to the road network via a new Link Street.

The site has been identified as a prime location for future residential development, comprising part of the overall Mungret Masterplan lands.

The proposed scheme features a variety of dwelling types designed to a high standard, and with easy access to a wide range of amenities of which future residents can avail including Mungret Neighbourhood Park and new primary and secondary schools. It is thus considered that the proposed development is wholly compliant with the policies of the National Planning Framework.

## 7.2 Sustainable Urban Housing: Design Standards for New Apartments 2018

The *Sustainable Urban Housing: Design Standards for New Apartments 2018* seek to promote high density and high quality apartment developments on residentially zoned land in appropriate locations in line with the above referenced NPF. The Guidelines acknowledge that apartment developments are most appropriately located within urban areas and that the scale and extent of apartment development should increase in relation to proximity to core urban centres.

The subject site would appear to be most akin to an “Intermediate Urban Location” as per the Guidelines, located on residential zoned land within the environs of the city in an area that is currently being serviced to facilitate development and in proximity to key employment locations. Irrespective, the Guidelines confirm that apartments may be considered as part of a mix of housing types in a given housing development at any urban location, including suburbs, towns and villages

Section 2.23 of the Guidelines note that publication of The National Planning Framework (NPF) has signaled a move away from rigidly applied, blanket planning standards in relation to building design, in favour of performance-based standards to ensure well-designed high quality outcomes. In particular, general blanket restrictions on building height or building separation distance that may be specified in Development Plans, should be replaced by performance criteria, appropriate to location.

## 7.3 Sustainable Residential Development in Urban Areas Guidelines 2009

The Sustainable Residential Development in Urban Areas Guidelines 2009 advocate the use of ‘Universal Design’, whereby a development is accessible and usable by as many people as possible, regardless of abilities or age. National policy makes it clear that sustainability is not confined to the physical environment. Sustainable neighbourhoods require a range of community facilities, and each district/neighbourhood will need to be considered within its own wider locality.

In this regard, the Southern Environs LAP considers the holistic development of the subject lands in the context of necessary and proposed infrastructure with a view to creating an attractive and walkable residential neighbourhood with high-quality residential, community, civic and recreational amenities. The proposed development has been advanced in the context of the LAP and an overall masterplan for the site. In addition to

the proposed residential units, provision shall be made for a childcare facility on site, local retail units and a community facility.

The Guidelines encourage the sustainable and efficient use of land and seek to ensure that sustainable travel patterns are encouraged. It recommends a number of qualitative standards regarding open space provision, design, accessibility, shared use and SUDs. All of these elements have been incorporated into the proposed design approach. Whilst some 7.5% of the net developable area of the site has been allocated to open space, it is the quality of that open space which is considered to be most important. In this regard the landscaping plan seeks to enhance the quality of open space, providing for local pocket parks and play facilities. Further when one considers the overall Public Square and ancillary green spaces, then open space provision increases to 14.6 per cent of the gross site area.

In accordance with the Outer Suburban / Greenfield site categorisation provided in the Guidelines, the subject site can be defined as open lands on the periphery of a city whose development requires the provision of new infrastructure, roads, sewers and ancillary social and commercial facilities, schools, shops, employment and community facilities. The Guidelines state that the greatest efficiency in land usage on such lands will be achieved by providing net residential densities in the general range of 35-50 dwellings per hectare and such densities (involving a variety of housing types where possible) should be encouraged generally. The proposed development with a net density of 41 dwellings per hectare falls within the range of density provisions promoted in the Guidelines.

#### 7.4 Regional Spatial and Economic Strategy for the Southern Region (RSES)

The RSES sets out a twelve year strategic development framework for the Southern Region. It establishes a broad framework for development and the way in which society, environment, economy and the use of land should evolve and works towards a broad vision of the Region's future, identifying key priorities for investment.

The city of Limerick is identified as a very important driver of national growth, a key regional centre that requires significant investment and growth. Limerick – Shannon is identified as a Metropolitan Area on the settlement typology. The MASP for Limerick – Shannon highlights the need to increase residential density in Limerick City and Shannon through a range of measures including reductions in vacancy, re-use of existing buildings. A dynamic approach to land-use within the footprint of existing settlements is sought by the RSES in order to maximise the opportunity of urban regeneration and infill sites to contribute to sustainable compact growth and revitalisation of our existing settlements of all scale.

The RSES supports infill development and the regeneration of key sites with higher densities through the provision of a number of key objectives including:

- Objective RPO10 which seeks, *"the prioritisation of housing and employment development in locations within and contiguous to existing city footprints where it can be served by public transport, walking and cycling"*; and
- Objective RPO165 which seeks to ensure that *"local authorities, through appropriate Development Plan policies shall ensure the consolidation of development at higher densities within existing urban centres, with a focus on locations where it can be demonstrated that such development supports the use of walking, cycling and public transport"*.
- Objective RPO176 promotes a "10-minute" city and town concept which *"aims to attain sustainable compact settlements whereby, a range of community facilities and services are accessible in short walking and cycle timeframes from homes or are accessible by high quality public transport services by connecting people to larger scaled settlements delivering these services"*.

A Metropolitan Area Strategic Plan (MASP) has been prepared for the Limerick – Shannon Metropolitan Area. Progressing the sustainable development areas for housing in Mungret is recognised in the MASP. MASP Policy Objective 10 seeks to *"support the environmentally sustainable densification of Limerick City Centre, the assembly of brownfield sites for development and the regeneration and redevelopment of Limerick City and Suburbs to accommodate residential use"*.

#### 7.5 Limerick County Development Plan 2010 - 2016

In the Limerick County Development Plan 2010 - 2016 (CDP) Mungret is identified as part of the Tier 1 Gateway. It is clarified in the CDP that these locations are defined as comprising the areas covered by the Castletroy Local Area Plan and the Southern Environs Local Area Plan.

Up to 2016, an additional 1,811 housing units were required in the Southern Environs according to the core strategy with a further 2,898 units required by 2022. Notwithstanding that the core strategy was based on old Census of Population data, the core strategy indicates that some 2,898 houses must be provided in the Southern Environs between 2016 and 2022. This figure excludes any remaining surplus in the 2010 – 2016 period which required 1,811 units and highlights the significant number of additional housing units required in the Southern Environs area.

Chapter 4.0 of the CDP promotes housing. Objective HOU O1 promotes density in accordance with the 'Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities' and the accompanying 'Urban Design Manual', DEHLG, May 2009; and encourages increased densities that contribute to the enhancement of a town or village. Objective HOU O3 prioritises social integration by providing a mix of house types and sizes to meet the demand throughout the period of this Plan.

The proposed development has been designed taking the aforementioned objectives into account. Located on residential and community and education (creche & community

building) zoned land, the development has been advanced with the specific intention of facilitating social integration and a mix of housing units and with a net density of 41 units per hectare accords with the principles of relevant Guidelines promoted in the Plan.

## 7.6 Southern Environs Local Area Plan 2011 – 2017

The Southern Environs Local Area Plan 2011 – 2017 (LAP) is the pertinent statutory document guiding development at a site-specific level in the area. Whilst it is acknowledged that a new Draft Southern Environs Plan 2021 – 2027 has been prepared and has recently come off public display, the Draft LAP has not yet been adopted and is unlikely to be adopted during the consideration of the proposed development. Accordingly, compliance must be demonstrated with the existing LAP 2011 – 2017.

As clarified in Section 1.7.4 of the LAP, the plan has been prepared in accordance with the provisions of the County Development Plan and has been informed by a hierarchy of national, regional and local spatial planning policies including the 'Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities, DEHLG, 2009 and the accompanying Urban Design Manual' (refer Section 1.7).

In relation to housing, Objective HO1 states it is an objective of the Council, *"on serviced land that is zoned 'Residential Development Area', to facilitate sustainable residential development in accordance with the principles and guidelines of the 'Sustainable Residential Development in Urban Areas' (May 2009), the accompanying Urban Design Manual, and the Development Management Standards contained in the Limerick County Development Plan, 2010-2016"*

It further states in Objective HO2 in relation to density that it is an objective of the Council to: *"a) Promote the concept of a 'compact district' by encouraging appropriate densities in suitable locations and by resisting sporadic isolated developments; b) Require an average net density of 33 units per hectare on 'Residential Development Area' sites within the plan area"*.

Section 10.4 of the LAP identifies two opportunity sites within the Southern Environs area, the development / redevelopment of which represents opportunities for delivering environmental and economic benefits to the area. Opportunity Site 2: Mungret – Loughmore includes the subject lands. Objective MLO4 sets out very clear requirements for density and housing type mix

1. It is an objective of the Council to require an average density of 33 residential units per hectare on the Mungret – Loughmore lands.
2. Proposals should include, depending on the site and context, a range of house types, including 2 bedroom terraced or bungalow dwellings to larger detached houses, and include provision for a range of small starter homes.
3. It is expected that there will be a range of densities throughout the lands. The densities of individual sites or blocks should have regard to the predominant grain

and densities already established in the surroundings, to the proximity of the site to the neighbourhood hub, and to the predominant building type.

4. Proposals shall clearly demonstrate compliance with the criteria outlined in the Sustainable Urban Residential Development – Guidelines for Planning Authorities and the accompanying Urban Design Manual, DEHLG, May 2009 through the means of supplementary documents such as detailed master plans, design statements, traffic assessment studies, sustainability statements and social infrastructure assessment and any other diagrammatic means.
5. Where apartments are being proposed, they should be planned with a range of apartment sizes, and shall be consistent with DECLG guidance under s28 'Sustainable Urban housing: Design Standards for New Apartments' (DECLG, December 2015) in all respects including size, internal storage, private amenity space, ceiling height and aspect, and communal facilities etc.

In respect of archaeological features on site, the development has been progressed in accordance with a number of policies in the LAP including Objective EH5 where it states *"in relation to sites listed in the Record of Monuments and Places and other sites and features of historical interest, to require the following: a) the area of a monument and the associated buffer area shall not be included as part of the open space requirement demanded of a specific development but should be additional to the required open spaces; and b) if appropriate, where such a monument lies within a development, a conservation and/or management plan for that monument shall be submitted as part of the landscape plan for that development"*. Further Objective EH 6 states it is the objective of the Council *"to encourage the rehabilitation, reuse and change of use of existing older buildings and protected structures where appropriate, in order to give a continued viability to the existing building stock"*.

In terms of open space provision, the LAP provides a relaxation where development is located in proximity to a neighbourhood park. Objective MLO9 confirms that in the case of housing developments which are permitted on land, which is 400 metres from the Neighbourhood park, the developer is required to provide 50% (7.5% of the total site) of the required open space within the development and pay a contribution in lieu of the remaining 50% of the required open space.

Having regard to the proximity of the subject site to Mungret Neighbourhood Park (see Figure 10.0), the proposed development provides for 7.5% of public open space within the net developable site area and 14.69% within the gross site area (red line boundary).



**Figure 10.0** Location of site within 400m of Mungret Park

## 8.0 ASSESSMENT OF DEVELOPMENT

### 8.1 Principle of Development

The proposal, as presented, adopts a plan-led approach to development whilst also having regard to national guidelines and the overall masterplan prepared for the site.

The CDP identifies the Southern Environs as a future development area in the core strategy settlement structure stating the potential for an additional 2,898 residential units in the Southern Environs having regard to the extent of land that is zoned. Therefore, there is an identifiable need for housing within the Southern Environs and the proposed development at Mungret seeks to satisfy some of this demand.

The Southern Environs LAP supports the development of houses in the area by putting in place the necessary design and delivery parameters to guide development on the subject site. It is these design and delivery parameters that have heavily influenced the design approach to development on the site.

The land use zoning objectives as set out within the LAP primarily affords a '*residential development area*' zoning to the land. The LAP states that whilst housing is the primary use in this zone, recreation, education, crèche/playschool, clinic/surgery uses, sheltered housing and small corner shops are also envisaged, subject to the preservation of neighbouring residential amenity. The northern portion of the site, located just south of Mungret College and adjoining the proposed Public Square is zoned for community and

education purposes. This part of the site accommodates the proposed creche and the community building with ancillary café facility. The proposed development conforms to the zoning provision of the land and therefore must be deemed acceptable in principle.

Objective ZD2 sets out a number of key objectives for land zoned for residential use, including to:

- a. conserve and enhance the quality and character of the wider area;
- b. protect residential amenity and allow for development appropriate to the sustainable growth of the area;
- c. promote the provision of community and other facilities such as childcare as an integral part of residential areas subject to overall residential amenity;
- d. provide for a range of house types and sizes to meet the various housing needs of existing and future residents;
- e. facilitate the expansion of the area in a balanced and sustainable way;
- f. have regard to appropriate form and densities as set out in the DEHLG document 'Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities' (May 2009).

The proposed development seeks to conserve what is important on-site including trees and hedgerows, protected structures and NIAH monuments. The development has been sensitively designed and adopts a whole life stage to development providing for older person houses, starter homes, affordable homes and larger family units. The site is situated proximate to new infrastructural provision including schools, neighbourhood parks and new streets and the proposed development provides the necessary population to sustain these facilities.

The apartments have been designed in accordance with the Sustainable Urban Housing: Design Standards for New Apartments 2018 and more than satisfy all quantitative standards. All apartments, with the exception of 2 no. apartments located over the creche / community building, are dual aspect thereby satisfying the minimum threshold set out in the guidance, adequate storage is provided and the size of the units exceed minimum apartment size standards. An apartment schedule, detailing quantitative standards, accompanies the application.

The planning policy assessment undertaken in Section 7.0 of this report demonstrates how the proposed development is concurrent with land use planning and strategic planning at national, regional and local level. The documents confirm that the proposed residential development will contribute to the economic and sustainable development of the region. The planning policy assessment therefore brings forth the conclusion that the location, nature and function of the proposed development is in accordance with relevant plans and policies and should as a result be deemed acceptable in principle at the proposed location.

## 8.2 Density

The number of units proposed within the overall development seeks to accommodate medium density development on site in accordance with national, regional and local policy. The proposed development results in a net residential density of 41 no. units per hectare based on a net site area of 6.1 hectares.

The provisions of the National Planning Framework (NPF) as detailed in Section 7.1 of this report seeks to achieve greater densities on site, delivering more compact urban development within the defined boundaries of towns and villages.

The Sustainable Residential Development in Urban Areas Guidelines 2009 classifies the subject site as an Outer Suburban / Greenfield site. These lands are defined as open lands on the periphery of a city whose development requires the provision of new infrastructure, roads, sewers and ancillary social and commercial facilities, schools, shops, employment and community facilities. The Guidelines state that the greatest efficiency in land usage on such lands will be achieved by providing net residential densities in the general range of 35-50 dwellings per hectare and such densities (involving a variety of housing types where possible) should be encouraged generally. The proposed development with a net density of 41 dwellings per hectare falls within the range of density provisions promoted in the Guidelines.

In accordance with these Guidelines, the land could also be considered to fall within the 'Institutional Land' categorisation, particularly given the association of the land with the former Mungret Agricultural College. In such instances the Guidelines state that LAP's should be prepared to guide development on such lands, including the determination of relevant density standards.

The Southern Environs LAP has provided a broad framework for these lands and identified them as 'Opportunity Site 2'. Objective ML04 requires an average density of 33 residential units per hectare (Underline Our Emphasis). However, it is noted that Objective MLO4(3) acknowledges there will be a range of densities throughout the lands depending on site characteristics etc. It is thus realistic to assume that density provision will be higher and lower in certain instances but ultimately is required to average at 33 units per hectare. Given the location of this site in proximity to the Neighbourhood Park and newly constructed schools it is reasonable to assume that densities will be higher on this part of the overall masterplan site. At 41 units per hectare, the density proposed confirms to the expectation of higher densities anticipated in the NPF and other national guidelines, but ultimately conforms with the average density of 33 units per hectare promoted in the LAP and densities in the range of 35 – 50 units per hectare promoted in the Sustainable Urban Residential Development – Guidelines for Planning Authorities.

Overall, the density proposed will ensure that sufficient critical mass is developed on serviceable and accessible land in accordance with the objectives of current national planning policy.

### **8.3 Connectivity and Accessibility**

The *'Design Manual for Urban Streets and Road'* (DMURS) encourages greater pedestrian priority within an urban setting. It is a design objective to provide pedestrian permeability within a proposed development and with the surrounding network with less dominance of car usage in the internal layout.

The proposed development creates a transport hierarchy providing primacy to pedestrians and cyclists through the introduction of shared surfaces, pedestrian-only areas and traffic-calming in accordance with DMURS and current best practice. Vehicular movements are designed to be indirect in order to reduce speed and give primacy to cyclists, pedestrians and the communal activity.

Achieving efficient permeability was a key aspect of the design. To this end a dedicated walkway and cycle track have been provided along the northern site boundary to provide connectivity between the proposed residential units and the public square and creche. A further walkway is provided extending from the Public Square northwards towards Mungret College and the Neighbourhood Park. These links will also be of benefit to not only residents of the proposed development but also residents of existing housing schemes who wish to access facilities. Further such provision satisfies objectives within the LAP which seek to enhance connectivity across the lands.

### **9.0 CONCLUSION**

The assessment demonstrates how the proposed development is concurrent with land use planning and strategic planning at national, regional and local level. The planning application documentation submitted in support of the development confirms that a plan led approach to development has been adopted and that the development will contribute to the economic and sustainable development of the city.

The planning policy assessment brings forth the conclusion that the location, nature and function of the proposed development is in accordance with relevant plans and policies and should as a result be deemed acceptable in principle at the proposed location.