

# RESIDENTIAL DEVELOPMENT AT SPEAKER'S CORNER, LOWER CAREY'S RD, LIMERICK

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## Planning Statement

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Prepared for:



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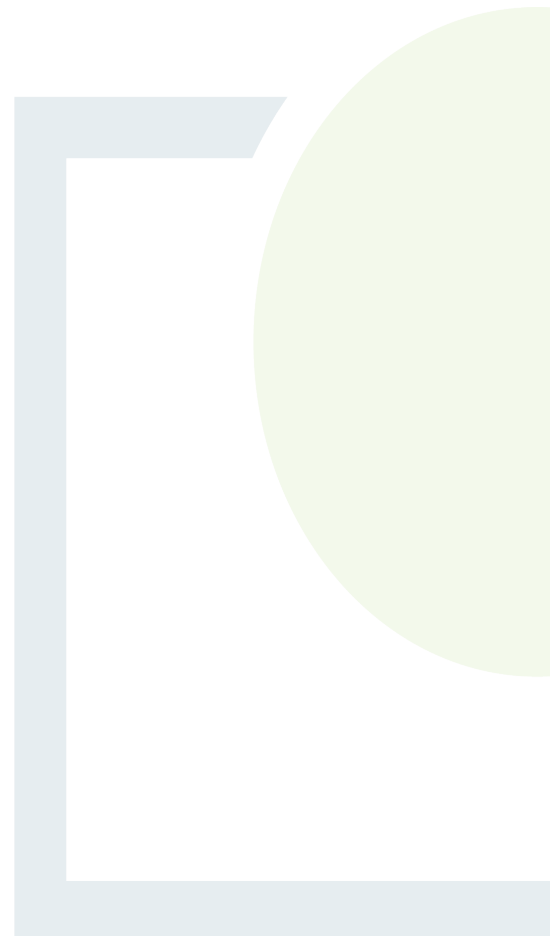
**Date:** August 2022

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## RESIDENTIAL DEVELOPMENT AT SPEAKER'S CORNER, LOWER CAREY'S RD, LIMERICK.

### REVISION CONTROL TABLE, CLIENT, KEYWORDS AND ABSTRACT User is responsible for Checking the Revision Status of This Document

Rev. No.	Description of Changes	Prepared by:	Checked by:	Approved by:	Date:
Rev 0	Issue for planning	DM	DM/ JH	JH	22.06.2022

**Client:** Limerick City and County Council

**Keywords:** Planning Statement, Residential, multi-story apartments, Limerick City, Part 8.

**Abstract:** Planning Statement for Residential Apartment Development at Carey's Road Lower, for the purposes of an application for development consent under Part 8 of the Planning and Development Regulations 2001 (as amended).

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## 1. INTRODUCTION

Fehily Timoney and Company has been engaged by Fewer Harrington Partners for Limerick City and County Council to prepare this Planning Statement to accompany a planning application for the proposed development of zoned lands at Careys Road Lower, Limerick. The purpose of this Planning Statement is to set-out the details of the proposed residential scheme of 36 no. apartments set within a single 5 storey apartment block and to demonstrate consistency of the proposal with the Limerick City Development Plan 2010-2016 (as extended) and the new Draft Development Plan 2022. in the context of the development general policies and the zoning objectives for the site, together with the associated planning history relevant to the site, and the sustainable development of the area. The Planning Statement has been prepared to accompany an application for planning consent under Section 179 of the Planning and Development Act 2000 (as amended) and Part 8 of the Planning and Development Regulations 2001 (as amended) for the proposed development.

### 1.1 Proposing Local Authority

Limerick City and County Council is the site owner and is the proposing local authority for the Part 8 consenting process.

### 1.2 Proposed Site and Context

The proposed site is located at Lower Carey's Road on 'brown field' lands of approximately 0.14ha (see figure 1-1 below). The site is known as Speaker's Corner and was previously occupied by residential development, now demolished. The lands are located at an inner city 'edge of centre' location, which includes a mixture of medium and high density residential development together with mixed use commercial activities. A small open space area which includes recently constructed car parking is located on the opposite side of the Carey's Road Lower. The Peoples park lies approx. 50m to the NW of the site and is a high quality city centre open space amenity for the area. The area has good bus connections and the site is located adjacent to Colbert bus and train station.

The lands are bounded by 3 storey buildings to the west and south, with residential and commercial units to its western side and residential units to the south. To the east on Hyde Road are two storey residential housing with a commercial 3 storey office unit at the corner of Lower Carey Road and Hyde Road.

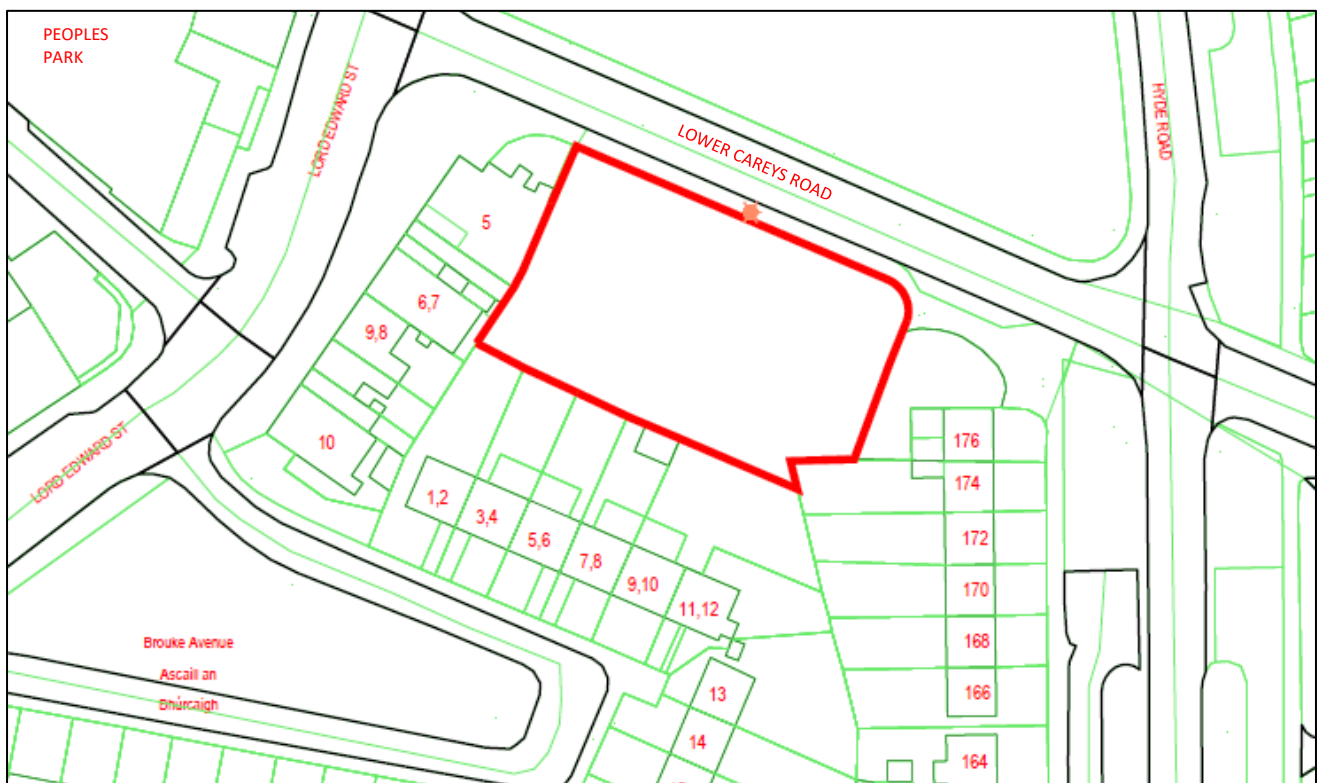
Historically, the lands were occupied by high density terraced housing set-out is a series of narrow lanes set tangentially off Carey's Road (earlier Henry Street South). It is understood these were demolished between post WW2 and 1950's and approximately 8 no. local authority, 2 story houses were constructed. These in turn were demolished in 2006/07 to leave the site in its current condition.

An ecological site walkover survey undertaken by Fehily Timoney in May 2021 established there are no significant flora or fauna on the site. The site was not considered a suitable habitat for bats. Other than presence of buddleia (*Buddleia davidii*) on small parts the lands no significant invasive species were identified, including no evidence of Japanese Knotweed.



**Plate 1: Speaker's Corner – looking west. The largely concrete/hardcore nature of the site is visible, with some grasses and species of disturbed grounds present. There are no ecologically significant features on site.**

The lands are located in Flood Risk Zone C, site levels of the development lands are between 11.0 m and 12.5m mOD and are comfortably above the 1:1000 year flood level of 5.17m in the area. The site was found to have no direct hydrologically links to any protected sites, aquatic surveys are also deemed unnecessary. Roadside drains off the site on Lower Careys Road provide for storm water management. Design engineers, Garland Consulting have confirmed these are connected to Bunlickey Waste Water Treatment Plant (WWTP).



**Figure 1-1: Site Location**



### 1.3 Planning History

No recent relevant planning permission on the proposed site were identified<sup>1</sup>.

Relevant planning applications for adjacent lands at the residential scheme at, The Park, Lord Edward Street; the mixed use development at the adjacent corner site, 'Speakers Corner' at Lower Careys Road; at house no's. 1, 4, 5, 8 and 9 Bourke avenue, details are listed in tables 1-1, 1-2 and 1-3 respectively below.

**Table 1-1 Planning History, Lord Edward Street**

Lord Edward Street (The Park)		
Ref:	Development	Decision
02/770453	Demolition of existing dwelling house and outbuildings The development of 59no. residential apartments consisting of 55no. 2 bed units, 3no. 3 bed units and 1.no single bed unit. The provision of 148sqm of Retail/Commercial Floor Area. 72sqm of Office floor area underground car parking for approx. 60 no. cars and associated site works.	Grant Permission with Conditions
04/770185	Permission for development (1) Change of use of portion of basement car park to Limerick City Council Parks Dept Depot. (2) Change of use of ground floor apartment to form extension to commercial unit. (3) Change 3 bed penthouse apartment to 2 no. 2 bed apartments.	Grant Permission with Conditions
07/0197	permission to convert the existing ground floor apartment to office use. The development also involves forming an opening between the property and existing adjoining office.	Grant Permission with Conditions

**Table 1-2 Planning History, Lower Carey Road**

Lower Careys Road (Speakers Corner)		
Ref:	Development	Decision
P98/320	Demolish Existing Structure and construct 1 no. commercial unit and 2 no apartments at first floor and 2 no apartments at second floor	Grant Permission with Conditions

<sup>1</sup> Planning search was undertaken on Limerick City and County Council planning web search. Covid-19 restrictions precluded search at local authority offices.





Lower Careys Road (Speakers Corner)		
P99/320	Amendment to P98/320 Change of use from apartments to office space at first floor	Grant Permission with Conditions
10/770084	Change of use from commercial to restaurant outlet at ground floor	Grant Permission with Conditions
16/934	Change of use of the ground floor unit from commercial to office and the change of use of the first floor from office to residential to create 2 dwellings. Additional works to the elevations include the removal of signage, faux-balconies, conical cladding to ground floor columns and the removal of the glazed rooftop cupola. All windows are to be replaced and all elevations will be re-painted. New works include 2 new flat roof type rooflights, external signage and internal window decals to front elevations and the creation of 3 new window opes to the rear ground floor elevations	Grant Permission with Conditions

**Table 1-3 Planning History, Bourke Avenue**

Bourke Avenue		
Ref:	Development	Decision
178014 (Part 8 Limerick Local Authorities)	(i) provision of a 18 sqm single storey monopitch extension to the front of no.1,4,5,8 and 9 Bourke Avenue ground floor 1 bed units; (ii) a 24 sqm extension to the rear of 12 Bourke Avenue; (iii) refurbishment of 2,3,6,7,10 & 11 Bourke Avenue with minor alterations to position of window openings; (iv) demolition of the existing chimneys and the replacement of the existing roof finish; (v) replacement of all windows and the painting of elevations; (vi) Ground floor entrance canopies being constructed above each unit entrance; (vii)the demolition of the existing boundary walls with Bourke Avenue and adjoining properties; (viii)the demolition of three sheds to the rear of the flats and outbuildings adjoining adjacent properties; (ix) new masonry boundary walls; (x)hard and soft landscaping throughout and resurfacing of the adjoining footpath on Bourke Avenue; (xii) all associated site works.	Approve with conditions





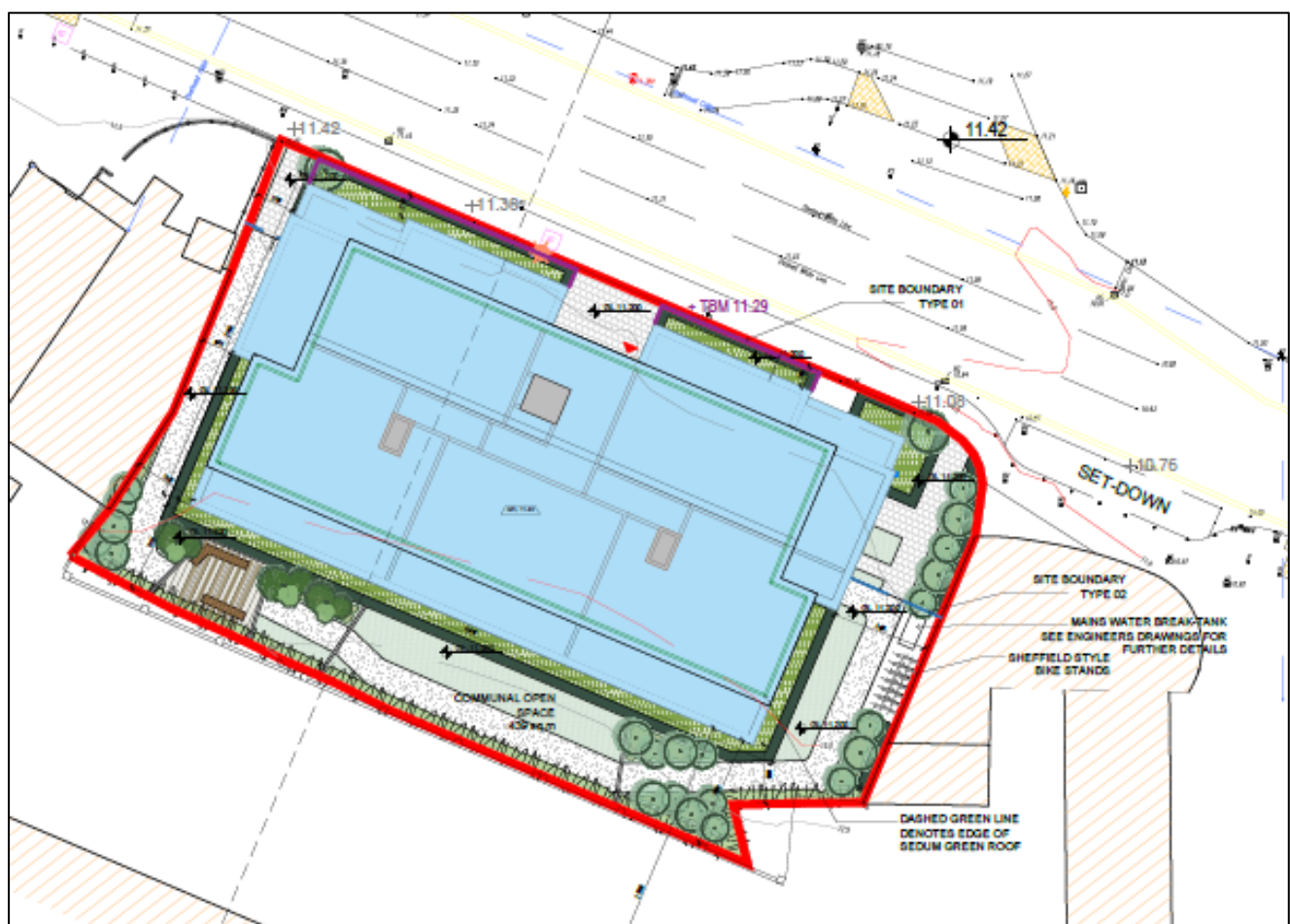
## 2. DESCRIPTION OF PROPOSED DEVELOPMENT

### 2.1 Proposed Apartment Block

The proposed development consists of a single apartment block of 5 no. storeys to provide for 36 no. apartments consisting of 25 no. 2-bed units and 11 no. 1-bed units. The proposed finish will be of brick with passive UPVC casement windows and aluminium doors and sills together with coloured spandrels. Balconies to include pressed metal canopies are proposed for each apartment. The 5<sup>th</sup> story will be set-back from the front and rear façade and will have a metal cladding. A 'green' flat roof is proposed for the building. Services will be provided internally with service riser proposed as part the single central lift shaft and stair core. Bin storage, and services rooms are proposed to on the eastern side of the block. The building entrance is located centrally and will lead directly to Lower Careys Road. No car parking is proposed for the development.

An extract of the site layout and the architect's rendition of the front (North) elevation are shown below in figures 1-1 and 2-2 below.

The proposed site density is **257 units per hectare<sup>2</sup>**.



**Figure 2-1: Extract of Site Layout from Drawing No. PP-01**

<sup>2</sup> Site area: 0.14ha. Dwelling Units 36 no apartments.



The total gross floor space for the building is 3,196 m<sup>2</sup><sup>3</sup> and building ground floor footprint will be 668 m<sup>2</sup>. The site level is proposed at 11.20mOD proposed finished ground floor level (FFL) is at 11.40 mOD and proposed ridge roof level is 27.65 mOD (top of roof parapet) to give a total building height of 16.45 m.

The grounds of the building will be landscaped to provide public open space for the apartment residents. A sheltered bike store is proposed on the eastern side of the grounds area.



**Figure 2-2: Architect's rendition of front (North) elevation of the proposed development.**

We refer to submitted drawings and the Design Statement for further details.

## 2.2 Surface Water Drainage

The proposed storm water drawing system will include attenuation tanks to manage flow of water (rate of 2l/s is proposed) prior to discharge to the existing combined sewer at the north east boundary of the site.

A sustainable urban drainage system (SUDS) to cater for storm runoff from the development has been designed in accordance with the CIRIA SUDS Manual 2015 and Greater Dublin Strategic Drainage Study (GSDSDS). Proposed SUDS features include the following:

- Green roof.
- Catchpit manhole.
- Attenuation tank.
- Hydro brake limiting flow to Qbar greenfield rates.

Details of the proposed SUDS measure and site constraints are set-out in the accompanying Engineering Services report. Storm water from the green roof will be collected using a pipe network. The pipe network will

<sup>3</sup> Excludes balconies and terraces.



discharge via a catchpit manhole to the proposed underground geo-cellular attenuation tank. From the tank surface water will discharge to the combined foul and storm water network for treatment at Bunlickey WWTP.

## 2.3 Foul Drainage

The proposed foul sewer network layout for this development is shown on GARLAND Drawings W0622-GAR-XX-XX-DR-C-0010. The foul sewer network was designed in accordance with Irish Water Code of Practice July 2020 and to IS EN 12056 and IS EN 752.

A pre-connection enquiry lodged with Irish Water for the proposed development outlining proposed flows and loading. This was accepted in principle as feasible by Irish Water.

## 2.4 Water Supply

The proposed internal water supply network for the development has been designed in accordance with Irish Water Code of Practice July 2020. The proposed water supply network layout for the development is shown on GARLAND Drawing W0622-GAR-XXXX- DR-C-0010.

The pre-connection enquiry to Irish Water confirmed the requirements of the proposed development was acceptable in principle.



### 3. PLANNING POLICY AND CONTEXT.

The following section of the Planning Statement provides an appraisal of the proposed development with regard to the relevant planning policies and objectives as set out in key policy documents including the National Planning Framework 2040, Limerick City Development Plan 2010-2016 (as extended) and the Draft Limerick City and County Development Plan 2022, Sustainable Residential Development in Urban Areas (2009) document, Quality Housing for Sustainable Communities (2007) Document.

The purpose of this section to provide the basis of the development's compliance and adherence to the policies and objectives in order to determine its need, planning merits and opportunities.

#### 3.1 Project Ireland 2040: The National Planning Framework

Project Ireland 2040: The National Planning Framework (NPF) published in February 2018, sets out the high-level, strategic planning and development for the country over the next 20+ years.

The NPF sets out ambitious targets for Limerick City and suburbs as per Table 2.1:

***Targeted Pattern of Growth, 2040, with population growth of 50,000 to 55,000 persons in Limerick City and suburbs and a minimum population of 145,000 anticipated by 2040. This will require a population growth rate of over 50% at 2040. A key tenet of the NPF is promotion of compact city areas and at least 30% of new housing is sought to be located within the existing footprint of Limerick city.***

This aligns with National Policy Objective 8 which states that:

***"To ensure that the targeted pattern of population growth of Ireland's cities to 2040 is in accordance with the targets set out in Table 4.1."***

#### 3.2 Rebuilding Ireland: Action Plan for Housing and Homelessness

'Rebuilding Ireland – Action Plan for Housing and Homelessness' sets out a five pillar approach for provision of sustainable housing in Ireland. Pillar 3 aims to support the building of new homes and outlines the Government's objective:

***"to ramp up delivery of housing from its current under-supply across all tenures to help individuals and families meet their housing needs".***

The Rebuilding Ireland Action Plan sets ambitious targets to double the level of residential construction annually to 25,000 homes and deliver 47,000 units of social housing in the period to 2021.

The location of the subject site, as well as the proposed mix of apartment dwellings ensures that the overall plan will contribute positively to meeting the objectives as set out in the Rebuilding Ireland document.



### 3.3 Urban Design Manual: A Best Practice Guide (2009)

The proposed Speakers Corner scheme has been designed in accordance with best practice as set out in the Urban Design Manual (2009). 12 criteria are provided within the Manual that should guide urban residential development:

1. *Context - How does the development respond to its surroundings?*
2. *Connections - How well connected is the new neighbourhood?*
3. *Inclusivity - How easily can people use and access the development ?*
4. *Variety - How does the development promote a good mix of activities?*
5. *Efficiency - How does the development make appropriate use of resources, including land?*
6. *Distinctiveness - How do the proposals create a sense of place?*
7. *Layout - How does the proposal create people friendly streets and spaces?*
8. *Public Realm - How safe, secure, and enjoyable are the public areas?*
9. *Adaptability - How will the buildings cope with change?*
10. *Privacy and Amenity - How does the scheme provide a decent standard of amenity?*
11. *Parking - How will the parking be secure and attractive?*
12. *Detailed Design - How well thought through is the building and landscape design?*

The Design Statement as prepared by Fewer Harrington and Partners and submitted as part with the planning application demonstrates achievement of the criteria listed in the Urban Design Manual.

### 3.4 Sustainable Urban Housing: Design Standards for New Apartments (2020)

This 2020 publication from the Department of Housing, Local Government and Heritage was an update of the 2018 'Sustainable Urban Housing : Design Standards for New Apartments' , however only section 5 of the guidelines were updated, all other aspects remained unchanged. Section 5, was concerned with Build to Rent and Shared Accommodation / Co-living and the 2020 update indicated a presumption against planning permission for co-living development. This does not affect the proposed development and no shared accommodation is proposed.

The ministerial guidelines require local authority to adopt the approach that:

*"In larger scale and higher density developments, comprising wholly of apartments in more central locations that are well served by public transport, the default policy is for car parking provision to be minimised, substantially reduced or wholly eliminated in certain circumstances."*

The accompanying Design Statement sets-out how the proposed development address the apartment standards in the 2020 / 2018 'Sustainable Urban Housing: Design Standards for New Apartments'. We also refer to the submitted Daylight and Sunlight report and Mobility Management Plan.

### 3.5 Urban Development and Building Heights (2018)

These 2018 ministerial guidelines draws from the National Planning Framework for delivery of compact urban growth facilitating increased residential opportunities on brownfield sites within Ireland's cities and large towns. Actively encouraging and promoting significant increases in building heights by local authorities and An Bord Pleanála is seen to play a critical role in achievement of national policy.





The guidelines support provision of buildings of 4 storey or more for housing at edge of centre locations (para 3.6) where positioned adjacent to existing larger buildings or with parkland frontage and wider streets. Strategic Planning Policy Requirement 4 (SSPR 34) under Section 28 (1C) of the Planning and Development Act 2000 (as amended) is relevant:

#### **SSPR4**

*It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:*

1. *the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled "Sustainable Residential Development in Urban Areas (2007)" or any amending or replacement Guidelines;*
2. *a greater mix of building heights and typologies in planning for the future development of suburban locations; and*
3. *avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more.*

### **3.6 Limerick City Development Plan 2010 – 2016 (as extended).**

The Limerick City Development Plan 2010 – 2016 (as extended) (CPD) set outs the current policies and objectives for Limerick City and this provides are the relevant local planning guidance for the proposed development.

The subject site is zoned '2A Residential' which has a zoning objective of:

***"To provide for residential development and associated uses."***

As part of the general Zone 2 policies this provides for new residential provision and protection of residential uses and residential amenity. Some other uses may be permitted provided they do not detract from residential amenity and do not conflict with the employment use and related zoning objectives.

The lands are close to zone 1 ((ABC) City Centre Area, and two adjacent Open space areas, the subject development would not conflict with policies associated with the city centre.

Relevant housing policies in chapter 6 of the CDP are set out below in table 3-1.

**Table 3-1 Relevant CDP Housing Policies**

Policy Ref:	Policy
<b>H.3</b>	It is the policy of Limerick City Council to encourage the establishment of sustainable residential communities by ensuring that a mix of housing and apartment types, sizes and tenures is provided within the City.
<b>H.4 *</b>	It is the policy of Limerick City Council to have regard to the policies and objectives of the following Strategies and Plans: - Sustainable Residential Development in Urban Areas (DEHLG 2008) - Urban Design Manual – A Best Practice Guide (DEHLG 2008) - Quality Housing for Sustainable Communities (DEHLG 2007)



H.5	It is the policy of Limerick City Council to promote increased density where appropriate to do so, having regard to the existing or proposed public transport provision and proximity to the City Centre.
H.6	It is the policy of Limerick City Council to ensure a balance between the reasonable protection of existing residential amenities, the established character of the area, and the need to provide for sustainable residential development.

**NOTE:** \* Ministerial guidelines referred to in H.4 have been updated and are referenced above.

Chapter 10 of the CDP considers the historic context for the city. The lands are not located within an Architectural Conservation Area and there are no protected structures, or records of archaeological remains at or adjacent to the subject site. The accompanying Archaeological Impact Assessment prepared by Aegis consulting considered the historic context and impact of the site and proposed development.

Chapter 11 of the CDP 'Landscape, Biodiversity and Key Landscape Assets set-out policies for management and protection of important landscape features and protection of biodiversity resources of the city. There are no designated special views or sensitive urban landscapes features affected by the proposed development. The CDP indicates that 'Appropriate Assessment' is required by Regulation 48 of the Habitats Regulations 1994 implementing Article 6(3) of the Habitats Directive (92/43/EEC) in respect of any plan or project which either alone or in combination with other plans or projects would be likely to have a significant effect on a European Site, and is not directly connected with the management of the site for nature conservation. An Appropriate Assessment screening report has been prepared which established that Appropriate of the proposed development is not required.

Chapter 13, relates to objectives associated with individual suburban areas in the city, the subject site is located in the Edward Street / Jansboro Area which has the following objectives:

***The City Council will be guided by the following specific objectives in relation to the Edward Street/Jansboro Area:***

- To promote a high standard of urban design with a clear sense of place and architectural quality that respects the existing character;
- To ensure the provision of infrastructure appropriate to the needs of the area;
- To ensure that the regeneration programmes do not adversely impact on the amenities of the area;
- To ensure an appropriate mix of uses in the area to support the primary residential function of the area these include specific supports for the population of the area;
- To ensure that an appropriate transportation system serves the area. *Chapter 5 Transportation* sets out the objectives to provide adequate pedestrian, cycling and public transport throughout the area;
- To seek the development of the existing under-utilised lands in the area in particular those lands under the control of the City Council;
- To support the development of recreational facilities.

Development management criteria for city centre/inner suburban based multi-storey apartment dwellings is set-out in chapter 12 of the CDP. This includes requirement to demonstrate the achievement of high quality design standards pin Design Statements, and Planning Statements (DM-2), protection of natural and cultural heritage and achievement of energy efficiency. Quantitative standards are set-out in Part II, and indicate standards and requirements relevant to the subject development in respect of:





- Residential density,
- Site coverage,
- Building height,
- Universal access design,
- Mobility management including car parking, cycle provision,
- Drainage and infrastructure,
- Apartment standards, including open space.

The achievement of standards and development management requirements is set-out in the proceeding section of this report.

The development plan is under review and following the publication of 'Issues Paper' and acceptance of public submissions on this, a draft development plan is due to be published in early summer 2021. Key topics highlighted in the Limerick Development Plan 2022-2028 Issues Paper include:

- NPF objectives: additional 56,000 people in Limerick City and Suburbs by 2040,
- 50% of new homes will be within the existing built-up area in Limerick City,
- City Wide public transport network,
- Implementation of the Limerick 2030 economic strategy,
- Sustainable greenfield & brownfield development and support for the City's inner city and inner suburban areas.

### 3.7 Draft Limerick City Draft Development Plan 2022 – 2028

The Draft Limerick City Development Plan 2022 – 2028 (CPD) will set out policies and objectives for Limerick City and will provide the relevant local planning guidance for development.

The proposed site is under Level 1 in the Settlement Hierarchy in the Draft Limerick City Draft Development Plan 2022 – 2028. As the proposed development is residential, *Chapter 3 – Settlement and Housing Strategy* is the predominant area where the Limerick City Draft Development Plan 2022 – 2028 relates to the proposed development and are referred to below. The subject site is zoned as 'Existing Residential' which has a zoning objective of:

***“To provide for residential development, protect and improve existing residential amenity.”***

Relevant housing policies in chapter 3 of the upcoming CDP are set out below in table 3-2.

**Table 3-2 Relevant upcoming CDP Housing Policies**

Policy Ref:	Policy
SS P1	It is a policy of the (Limerick City Council to: a) Align with the provisions of the National Planning Framework and the Regional Spatial and Economic Strategy for the Southern Region. b) Accord with the Core Strategy set out in Chapter 2: Core Strategy and the Draft Housing Strategy, including the Housing Needs Demand Assessment for Limerick set out in Volume 6 of the Draft Plan. c) Seek to promote the creation of sustainable places and healthy communities, while ensuring that development occurs at an appropriate pace and that infrastructure is delivered in tandem to support this growth.



<b>SS P2</b>	It is a policy of the (Limerick City) Council to develop Limerick in accordance with the Settlement Strategy and Hierarchy and to require future residential development to locate at and be of a scale appropriate to, the settlement and growth levels identified in the Core Strategy.
<b>SS P3</b>	It is a policy of the (Limerick City) Council to strengthen and consolidate Limerick City Metropolitan Area as a key driver of social and economic growth in Limerick and become a vibrant living, retailing and working City. In accordance with national and regional policy it is a requirement that at least 50% of all new homes will be located within the existing built-up footprint of the settlement, in order to deliver compact growth and reduce unsustainable urban sprawl.

*Chapter 2 – Core Strategy* outlines the overall framework for the objectives and policies throughout the Draft Plan. The Core Strategy provides a transparent evidence-based rationale for the amount of land proposed to be zoned for new residential development and for mixed use development, involving a residential component that is required to meet the proposed population growth over the lifetime of the Draft Plan period, at settlement level. The central focus of the Core Strategy is to ensure there is an acceptable equilibrium between the supply of zoned and serviced land for the projected demand for new housing, jobs, social and economic infrastructure.

Relevant housing policies in Chapter 3 of the upcoming CDP are set out below in Table 3-3.

**Table 3-3 Relevant upcoming CDP Core Strategy Policies**

Policy Ref:	Policy
<b>CSP P1</b>	It is a policy of the Council to implement the Core Strategy for Limerick to ensure consistency with policies at a national and regional level, in particular population targets and distribution.
<b>CSP P2</b>	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.
<b>CSP P3</b>	It is a policy of the Council to ensure that sufficient zoned land continues to be available for the projected population and employment growth over the lifetime of the Draft Plan.

*Chapter 10 – Compact Growth and Revitalisation* of the upcoming CDP sets out the policies and objectives for compact growth and revitalisation. This is to ensure that development within existing settlements will ensure the efficient use of infrastructure, achieve compact growth objectives and cater for the residential and employment targets for Limerick set out in the National Planning Framework, in a sustainable manner. As the site is residential, the policies outlined in this Chapter are relevant to the subject site.

The relevant Compact Growth and Revitalisation policies subject to this site are set out in Table 3-4.



**Table 3-4 Relevant upcoming CDP Compact Growth and Revitalisation Policies**

Policy Ref:	Policy
<b>CGR P1</b>	It is a policy of the (Limerick City) 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 and underutilised sites within the existing built footprint of Limerick's City, Towns and Villages.

*Chapter 8 – Climate Action Flood Risk and Transition to Low Carbon Economy* set-out policies for management and protection of important landscape features and protection of biodiversity resources of the city. There are no designated special views or sensitive urban landscapes features affected by the proposed development. The CDP indicates that 'Appropriate Assessment' is required by Regulation 48 of the Habitats Regulations 1994 implementing Article 6(3) of the Habitats Directive (92/43/EEC) in respect of any plan or project which either alone or in combination with other plans or projects would be likely to have a significant effect on a European Site, and is not directly connected with the management of the site for nature conservation. An Appropriate Assessment screening report has been prepared which established that Appropriate of the proposed development is not required.

Development management criteria for city centre/inner suburban based multi-storey apartment dwellings is set-out in *Chapter 11 – Development Management Standards* of the CDP. This includes requirement to demonstrate the achievement of high-quality design standards pin Design Statements, and Planning Statements (DM-2), protection of natural and cultural heritage and achievement of energy efficiency. Quantitative standards are set-out and indicate standards and requirements relevant to the subject development in respect of:

- Residential density,
- Site and Floor coverage,
- Building height,
- Universal access design,
- Mobility management including car parking, cycle provision,
- Drainage and infrastructure,
- Apartment standards, including open space.

The achievement of standards and development management requirements are set out in the proceeding section of this report.

### **3.8 Colbert Station Quarter (2020)**

The Land Development Agency in partnership with Limerick City and County Council, CIÉ and the HSE are developing plans to consider the potential for development of a 50-hectare site centred near the main transport hub of Colbert Station. The subject site adjoins the initial study area but is not included in it. The preliminary design review document 'A vision for Colbert Station Quarter, Limerick' (Nov. 2020) emphasises the strong residential and urban purposed nature of the long-term goals for the area. The high density scheme at Speakers Corner aligns with and will support these goals.



## 4. ENVIRONMENTAL IMPACT ASSESSMENT AND APPROPRIATE ASSESSMENT SCREENING

### 4.1 Environmental Impact Assessment Screening

An Environmental Impact Assessment (EIA) Screening report for the proposed development has been prepared by Fehily Timoney which adheres to the EIA Screening template and methodology provided in the Office of Planning Regulator Practice Note 2 'Environmental Impact Assessment Screening' (June 2021). The EIA screening accords with requirements of Part 1 and 2 of Schedule 5 of Planning and Development Act 2000 (as amended) and Schedule 7 of the Planning and Development Regulations 2001 (as amended).

The EIA Screening found that the proposed development would not be likely to have significant effects on the environment and that the preparation and submission of an environmental impact report is not therefore required. Full details of EIA screening and its considerations are set-out in the EIA Screening report provided in Appendix 1.

### 4.2 Appropriate Assessment Screening

An Appropriate Assessment (AA) Screening report was prepared by Dr. William O'Connor of ECOFACT Environmental Consultants Ltd. for the proposed development. The screening report concluded that there is no potential for significant effects on the Natura 2000 network. The full AA Screening report is provided under a separate cover with the submitted material.



## 5. PLANNING POLICY CONSISTENCY AND JUSTIFICATION FOR PROPOSED DEVELOPMENT

The proposed development provides for residential development on zoned lands residential use and is consistent with the pattern of development and planning history of the area. The overall design provides for a high quality apartments units on lands that face the adjoining park and provides clear high quality design standards.

Housing policies H3, H.4 H.5 and H.6 are achieved by the provision of a high density scheme intended for use by smaller households with local authority housing need (single people, 'down-sizing' couples etc.) with 1 and 2 bed-roomed apartments to be available at a well-connected, edge of city centre location. The massing and form of the apartment building, is located mid-way along the Lower Careys Road and builds on existing heights for the adjacent residential and commercial landuses.

As per Draft Limerick City Council Draft Development Plan 2022 – 2028, Housing policies SSP1, SSP2 and SSP3 are achieved by the provision of a high density scheme intended for use by smaller households with local authority housing need (single people, 'down-sizing' couples etc.) with 1 and 2 bed-roomed apartments to be available at a well-connected, edge of city centre location. Furthermore, the proposed development concurs with policy CGR P1 on compact growth within the Limerick Metropolitan Area. The massing and form of the apartment building is located mid-way along the Lower Careys Road and builds on existing heights for the adjacent residential and commercial land-uses.

The natural and cultural heritage of the lands in respect of the development site and adjoining areas. No adverse effects to the city's natural and cultural resources are adversely affected. The accompanying Appropriate Assessment screening report concluded the proposed development could be screened out from requiring Appropriate Assessment.

Given the nature, scale and location of the proposed development environmental impact Assessment is not required.

The provision of additional population to the central area of Limerick city will help support commercial and community services. As an important Local Authority scheme, the proposed development will contribute to the achievement of development objectives of the Edward Street / Jansboro Area.

In table 4-1 below we outline achievement of quantitative and other development requirements for the proposed development.



**Table 5-1 Compliance with Current Development Management Policies.**

Development Management Criteria	Development Plan Standard / Policy Guidance	Proposed Development Compliance
<b>Residential Density</b>	<p><b><u>Outer City / City Centre Locations:</u></b> Densities in excess of 35-50 dwellings per hectare are sought, in particular when within walking catchment of public transport infrastructure subject to qualitative safeguards.</p> <p>Ministerial Guidance supports no upper limit.</p>	<p>Proposed density is <b>257 units/hectare</b>. [36 no. units on 0.140 ha]</p> <p>Compliance Considerations:</p> <ul style="list-style-type: none"> <li>Submitted Mobility Management Plan confirms high levels of connectivity to the site and availability of public transport.</li> <li>Development is within walking to city centre services and high quality public open space.</li> <li>Building design is in keeping with Urban fabric and pattern of development of the area. Typical separation distances for urban context are achieved.</li> <li>Submitted lighting studies demonstrate adequate distance to adjoining residential development with acceptable low levels of light loss and overshadowing.</li> </ul>
<b>Site Coverage</b>	<p><b><u>Outer City Centre location:</u></b> 80% Maximum site coverage</p>	<p>48% Site Coverage Achieved: <i>((Ground Floor Area [669sqm] / Site Area [1405sqm]) * 100)</i></p>
<b>Building Heights</b>	<p>Increased building heights are required by Ministerial Planning Guidance. Guidance indicates heights of over 4 storeys for apartments at central locations, including following relevant safeguards:</p> <ul style="list-style-type: none"> <li>Achieve Positive urban design,</li> <li>Incorporates successfully with the urban grain of the area.</li> <li>Respect urban landscape, views prospects, roofscape and vistas.</li> <li>Avoid serious disadvantage to immediate surroundings, existing and proposed.</li> <li>Design minimises overshadowing and overlooking.</li> </ul>	<p>A 5 no. storey building is proposed with roof level at 27.6 mOD, and Ground floor level at 11.4 mOD to give <b>overall height of 16.2m</b>.</p> <p>This is considered as medium height building. Key compliance considerations are:</p> <ul style="list-style-type: none"> <li>Height achieved accords with SPPR 4 of the Urban Development and Building Heights Guidelines (2018)</li> <li>Building is in keeping with pattern of development in area and of high quality design and finish.</li> <li>No designated urban landscapes view or prospects at or affected by the proposed building. Proposed development minimises visibility of roof-top plant and structures.</li> <li>Separation of 22m is achieved with adjacent housing at Bourke Avenue which would be</li> </ul>



Development Management Criteria	Development Plan Standard / Policy Guidance	Proposed Development Compliance
		<p>typical in an urban setting. Local topography reduces overshadowing effects.</p> <ul style="list-style-type: none"> <li>The submitted light study demonstrates no significant light loss or overshadowing.</li> </ul>
<b>Universal Access Design</b>	Buildings must comply with Part M (Building Regulations) and achieve a design that is safe and accessible for all user groups.	Design is compliant with Part M and provides for a safe and accessible building for all user groups. Submitted Design Statement set-out further details.
<b>Transport and Mobility Management including:</b>  <b>Car parking &amp; Cycle Provision</b>	<p>Achievement of design standards for urban setting for pedestrian, vehicle, and cycle access.</p> <p>Mobility management plans are required for large scale development with potential to affect traffic flow where generated traffic exceed 10% of the existing levels or 5% on at congested areas or to adjoining roads.</p> <p><u>CDP Standards:</u></p> <ul style="list-style-type: none"> <li>Car Parking Standards (CDP Table 16.1, 'Outer Core') Recommended 1 space for each apartment.</li> <li>Cycle Parking standards (CDP Table 16.2, 'Outer Core/suburban') 1 stand for per apartment.</li> </ul> <p>2020 Ministerial guidance for Apartment developments seeks to minimise or remove entirely car parking from apartment development at well connected, central locations. The CDP accepts that provision of cycle stands may not be possible on some sites, in that case development contribution calculated per stand may be made to compensate.</p>	<p>A Mobility management plan has been prepared to set-out the planning justification for design decision to prelude provision of dedicated car parking spaces for the proposed development.</p> <p>In considering the exclusion of car parking spaces the Mobility Plan highlighted the central location, provision of public transport infrastructure and services within walking distance of the development and the nature of the housing mix proposed and anticipated occupants. .</p> <p>The exclusion of car parking accords to national policy and ministerial planning guidelines and, given the site location and nature of the housing proposed, supersedes the standards set-out in table 16.1 of the CDP.</p> <p>A covered secure cycle parking area is provided for in the layout proposal to be located at the side passage, (southern elevation) of the proposed development. While the cycle area does not provide the quantum of stands recommended in the CDP, the cycle park area can be expanded to match demand levels. Noting that as part of the recommended actions of the Mobility Management Plan, a Travel Co-ordinator within the Local Authority is to be appointed and if required, expansion of the cycle parking area can be adjusted as part of the remit. This is considered an appropriate response, as provision of cycle spaces where there is low demand would be a lead poor use of the external area around the apartment building.</p>





Development Management Criteria	Development Plan Standard / Policy Guidance	Proposed Development Compliance
		Given CDP acknowledgement that some sites will not be able to provide the precise quantum of cycle stands indicated the CDP, and provision of a Travel coordinator, the proposed provision is considered to accord to in a general manner to the CDP.
<b>Drainage and Infrastructure</b>	Water Services and drainage infrastructure requirements are set-out in chapter 16. These cover risk flood management, water supply, water management, surface water management and utility services. The adoption of SUDs surface water management techniques is supported by the CDP.	<p>The accompanying Engineering Services report set-out all service provisions for the proposed development and includes the favourable responses from Irish Water in respect pre-connection enquiry.</p> <p>The engineering services report sets out how a number of SUDs measures are achievable for surface water management on the lands, including provision of a 'green roof' for surface water interception and a surface water attenuation tank to control surface water discharge to the combined sewer serving the site.</p>
<b>Apartment Standards, including open space.</b>	<p>Part III of chapter 16 includes Development Management requirements for residential and apartment development. These reflect housing policies and include floor area standards; unit layout requirements, including storage and refuge provision; lighting requirements; and communal and amenity space provisions.</p> <p>Layout and design requirements should conform, the relevant ministerial guidelines.</p>	<p>The submitted design statement sets out how all spatial and layout requirements are achieved and, in most instances, exceeded. We refer to table 7.2 'Schedule of Accommodation' and section 9 and 10 of the Design Statement for details. .</p> <p>A total of 439 sqm of communal open space is provided representing approximately 30% of the site area. Landscape quality measures are provided for the submitted drawings.</p>



**Table 5-2 Compliance with Upcoming CPD Development Management Policies.**

Development Management Criteria	Development Plan Standard / Policy Guidance	Proposed Development Compliance
<b>Residential Density</b>	<p><u>Density Zone 1 – City Centre, Central &amp; Accessible Locations:</u> A minimum net density of 100+ dwelling units per hectare are required at appropriate locations within the City Centre</p> <p>Ministerial Guidance supports no upper limit.</p>	<p>Proposed density is <b>257 units/hectare</b>. [36 no. units on 0.140 ha]</p> <p>Compliance Considerations:</p> <ul style="list-style-type: none"> <li>Submitted Mobility Management Plan confirms high levels of connectivity to the site and availability of public transport.</li> <li>Development is within walking to city centre services and high quality public open space.</li> <li>Building design is in keeping with Urban fabric and pattern of development of the area. Typical separation distances for urban context are achieved.</li> <li>Submitted lighting studies demonstrate adequate distance to adjoining residential development with acceptable low levels of light loss and overshadowing.</li> </ul>
<b>Floor Area</b>	<p>The proposed CPD Development plan doesn't outline any guidelines regarding site coverage. However, <i>Chapter 11 – Development Management Standards</i> outlines minimum apartment floor areas. in which these standards are met or exceeded throughout the development.</p>	<p><math>((\text{Ground Floor Area [669sqm]} / \text{Site Area [1405sqm]} * 100)</math></p> <p><i>Chapter 11 – Development Management Standards</i> states minimum floor standards. The proposed development is in line with these standards as they are met or exceeded throughout the development.</p>
<b>Building Heights</b>	<p>Increased building heights are required by Ministerial Planning Guidance. Guidance indicates heights of over 4 storeys for apartments at central locations, including following relevant safeguards:</p> <ul style="list-style-type: none"> <li>Achieve Positive urban design,</li> <li>Incorporates successfully with the urban grain of the area.</li> <li>Respect urban landscape, views prospects, roofscape and vistas.</li> </ul>	<p>A 5 no. storey building is proposed with roof level at 27.6 mOD, and Ground floor level at 11.4 mOD to give <b>overall height of 16.2m</b>.</p> <p>This is considered as medium height building. Key compliance considerations are:</p> <ul style="list-style-type: none"> <li>Height achieved accords with SPPR 4 of the Urban Development and Building Heights Guidelines (2018)</li> <li>Building is in keeping with pattern of development in area and of high quality design and finish.</li> </ul>



Development Management Criteria	Development Plan Standard / Policy Guidance	Proposed Development Compliance
	<ul style="list-style-type: none"> <li>Avoid serious disadvantage to immediate surroundings, existing and proposed.</li> <li>Design minimises overshadowing and overlooking.</li> </ul> <p>Volume 6 of the CPD Draft Development Plan – Building Height Strategy for Limerick City outlines the relevant building heights for development</p>	<ul style="list-style-type: none"> <li>No designated urban landscapes view or prospects at or affected by the proposed building. Proposed development minimises visibility of roof-top plant and structures.</li> <li>Separation of 22m is achieved with adjacent housing at Bourke Avenue which would be typical in an urban setting. Local topography reduces overshadowing effects.</li> <li>The submitted light study demonstrates no significant light loss or overshadowing.</li> </ul> <p>As per Volume 6 of the CPD Draft Development Plan – Building Height Strategy for Limerick City, this development adheres to the relevant building heights. Additionally, the submitted light study states no implications on surrounding development.</p>
<b>Universal Access Design</b>	Buildings must comply with Part M (Building Regulations) and achieve a design that is safe and accessible for all user groups.	Design is compliant with Part M and provides for a safe and accessible building for all user groups. Submitted Design Statement set-out further details.
<b>Transport and Mobility Management including:</b>  <b>Car parking &amp; Cycle Provision</b>	<p>Achievement of design standards for urban setting for pedestrian, vehicle, and cycle access.</p> <p>Mobility management plans are required for large scale development with potential to affect traffic flow where generated traffic exceed 10% of the existing levels or 5% on at congested areas or to adjoining roads.</p> <p><u>CDP Standards:</u></p> <ul style="list-style-type: none"> <li>Car Parking Standards (CDP Table DM 8(a) Recommended 0.5 spaces per unit as per Zone 1.</li> <li>Cycle Parking standards (CDP Table DM 8(a), 1 space for per unit as per Zone 1.</li> </ul>	<p>A Mobility management plan has been prepared to set-out the planning justification for design decision to prelude provision of dedicated car parking spaces for the proposed development.</p> <p>In considering the exclusion of car parking spaces the Mobility Plan highlighted the central location, provision of public transport infrastructure and services within walking distance of the development and the nature of the housing mix proposed and anticipated occupants.</p> <p>The exclusion of car parking accords to national policy and ministerial planning guidelines and, given the site location and nature of the housing proposed, supersedes the standards set-out in table DM8(a) of the CDP.</p> <p>A covered secure cycle parking area is provided for in the layout proposal to be located at the side passage, (southern elevation) of the proposed development. While the cycle area</p>



Development Management Criteria	Development Plan Standard / Policy Guidance	Proposed Development Compliance
	2020 Ministerial guidance for Apartment developments seeks to minimise or remove entirely car parking from apartment development at well connected, central locations. The CDP accepts that provision of cycle stands may not be possible on some sites, in that case development contribution calculated per stand may be made to compensate.	does not provide the quantum of stands recommended in the CDP, the cycle park area can be expanded to match demand levels. Noting that as part of the recommended actions of the Mobility Management Plan, a Travel Co-ordinator within the Local Authority is to be appointed and if required, expansion of the cycle parking area can be adjusted as part of the remit. This is considered an appropriate response, as provision of cycle spaces where there is low demand would be a lead poor use of the external area around the apartment building. Given CDP acknowledgement that some sites will not be able to provide the precise quantum of cycle stands indicated the CDP, and provision of a Travel coordinator, the proposed provision is considered to accord to in a general manner to the CDP.
<b>Drainage and Infrastructure</b>	Water Services and drainage infrastructure requirements are set-out in chapter 7. These cover risk flood management, water supply, water management, surface water management and utility services. The adoption of SUDs surface water management techniques is supported by the CDP.	The accompanying Engineering Services report set-out all service provisions for the proposed development and includes the favourable responses from Irish Water in respect pre-connection enquiry.  The engineering services report sets out how a number of SUDs measures are achievable for surface water management on the lands, including provision of a 'green roof' for surface water interception and a surface water attenuation tank to control surface water discharge to the combined sewer serving the site.
<b>Apartment Standards, including open space.</b>	<i>Chapter 16 - Development Management Standards</i> states the requirements for residential and apartment development. These reflect housing policies and include floor area standards; unit layout requirements, including storage and refuge provision; lighting requirements; and communal and amenity space provisions.  Layout and design requirements should conform, the relevant ministerial guidelines.	The submitted design statement sets out how all spatial and layout requirements are achieved and, in most instances, exceeded. We refer to <i>Chapter 16 – Development Management Standards</i> as per CPD Development Plan 2022-2028.  A total of 439 sqm of communal open space is provided representing approximately 30% of the site area. Landscape quality measures are provided for the submitted drawings.



## 5.1 Conclusion

This Planning Statement, which has been prepared by Fehily Timoney and Company, supports the Part 8 consent procedure for the proposed residential development of 36 no. apartment units with the 5 no storey apartment block at Lower Careys Road, Limerick City.

It is intended that the proposed development will assist Limerick City and County Council in meeting its commitment to provide for housing within its functional area contribute towards achieving sustainable and much needed new, targeted residential accommodation for the area.

The proposed development represents a high-quality design while optimising uses at the subject site through the provisioning of a well thought out scheme that provides high residential density in a well-connected central location in Limerick city . The delivery of residential units at this location support the sense of community within the area and provide for an appropriate use of the proposed site whilst contributing to the overarching neighbourhood strategy at for the Edward Street / Jansboro neighbourhood.

The Planning Statement, and supporting documentation, have demonstrated how the proposed development of 36no. dwelling units is in accordance with the zoning objectives of the Limerick City Development Plan and the Draft Limerick City and County Development Plan 2022 and complies with development standards of local and national policy documents.

It is considered the proposed development is in accordance with the National Planning Framework, relevant ministerial planning guidelines, and the policies of the Limerick City Development Plan 2010-2016 as extended.

An Environmental Impact Assessment Screening has been prepared which concludes that EIA is not required for the proposed project. An Appropriate Assessment Screening report has been prepared which concludes there is no potential for significant effects on the Natura 2000 network and a Natura Impact Statement is not required for the proposed project.

The development is in accordance with the proper planning and sustainable development of the area and accords with the requirements under Part 8 of the Planning and Development Regulations for the purposes of an application for development consent.

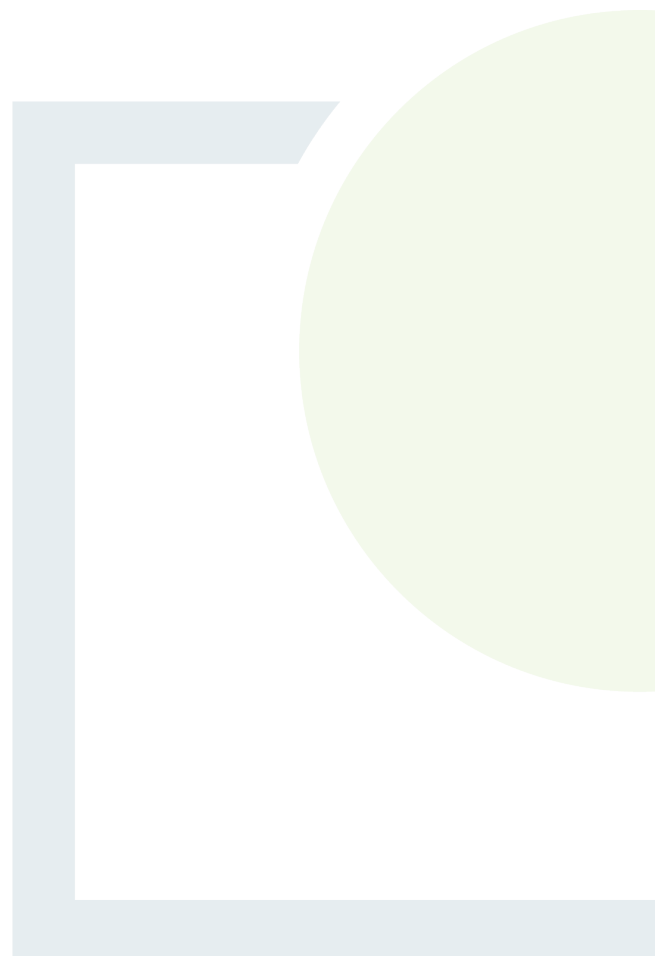


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ENVIRONMENTAL SCIENCE & PLANNING

## **APPENDIX 1**

Environmental Impact  
Assessment Screening Report



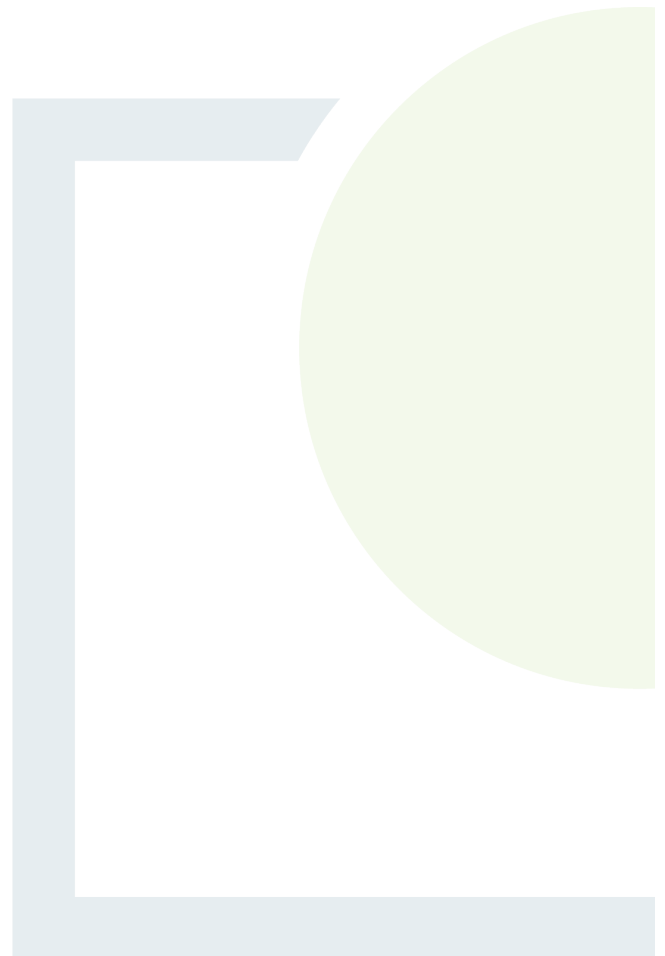


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## INSERT EIA SCREENING

[https://uss.ftco.ie/DMS/view\\_document.aspx?ID=706570&Latest=true](https://uss.ftco.ie/DMS/view_document.aspx?ID=706570&Latest=true)







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