



## **Mungret Residential Development** Planning Statement

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Proposed Development at Dromdarrig, Mungret, Co. Limerick

December 2023

Application prepared with



ARUP



DEVELOPMENT PLANNING | ENVIRONMENTAL PLANNING | MASTERPLANNING



**HRA | PLANNING**  
chartered town planning consultants

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## 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. The development is being pursued by Limerick City & County Council pursuant to a contract with the Land Development Agency.

This statement accompanies a proposed residential development intended to be carried out under Section 179A of the Planning & Development Act 2000. The proposed residential development comprises 250 no. residential units including housing and apartment units with ancillary community facilities. The purpose of this 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 as detailed in the existing Limerick Development Plan 2022 - 2028.

## 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. The site benefits from good access to the strategic road network, 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 are located within the area accessed off the R859 to the west of Mungret College. At present Mungret Community College operates from the building of the former Mungret College protected structure. However, planning permission for a new school premises with capacity to accommodate 1,000 pupils was secured and this new school is currently under construction. There is also the Mungret Neighbourhood Park a significant public park, north of Mungret College.

The area is subject to significant development interest with new homes constructed at The Grange, Mungret Woods and north of the R859 at Sli Na Manach. Construction is well advanced on a site for 203 no. homes (Mungret Gate and Baunacloka Heights) 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 ultimately provide access to the subject site.

Phase II of the Mungret Link Street, which provides access to the subject site, is currently under construction and is substantially complete. The road consists of a single carriageway road (6.5m carriageway road consisting of two lanes 3.25 meters wide). It also includes 2.5m wide parking bays, a delineation strip and 2.0m wide cycleways adjacent to a 2.0m footpaths.



**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. Agriculture and pNHA zoned residential lands adjoin the southern and western site boundaries.

Mungret College is currently in temporary use as a school until such time as the new Mungret Community College located south west of the site is completed. The use of the college as a school has resulted in a number of temporary portacabins dominating the area, immediately south and west of the school building. A number of temporary planning permissions were granted to these portacabins, with a condition that the structures be removed after a period of five years. Accordingly, these portacabins shall be removed at the same time as Mungret College is vacated.

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 categorized 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.

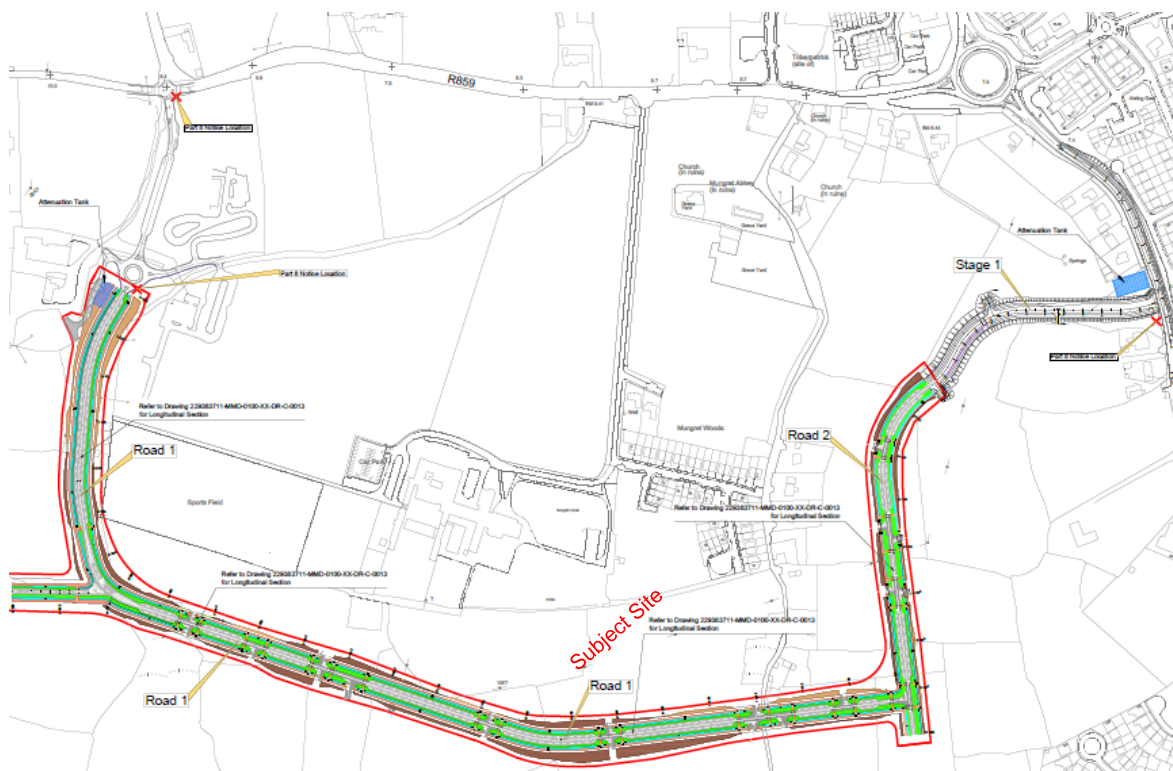
The overall landscape for the wider area is gently undulating with a general overall slope to the south. A ridge line runs roughly east to west through the north of the site. There are no protected views across the subject site. There is a protected view from Mungret College toward Mungret Abbey but 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.

A Part 8 consent was approved on the subject lands in 2021 consisting of 253 residential units, a creche, community facilities, café and local shops. However, following negotiations with third parties, it was agreed to set aside the consented Part 8 and to remove 3 no. dwellings on land proximate to Mungret Woods. The removal of these units, along with the replacement of the retail units with ground floor community uses, the provision of additional SUDs measures and changes in materiality to the proposed residential units, has resulted in the making of a new development scheme as proposed.

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 substantially complete and 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.



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

### 3.0 STRATEGIC DESIGN APPROACH

The project design team prepared a high-level framework plan for the subject site and adjoining lands extending 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). The Framework Plan demonstrated 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, which was adopted into the Limerick Development Plan 2022 – 2028 (LDP) 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.

Objective MF O1 of the LDP sets out the framework for development in Mungret. It focuses on creating a vibrant neighbourhood that accommodates a variety of uses, facilitating a strong community sense. The plan emphasises safety, with streets and spaces designed to be people-friendly and well-integrated with the surrounding areas, including Mungret Village, Dooradoyle, and Raheen. Additionally, it considers the environmental and historical significance of local sites like the Loughmore Common proposed Natural Heritage Area and the Mungret Monastic Complex.

### 3.1 Framework Plan Objectives

The vision for Mungret as detailed in Figure 3.0 & 4.0 is expressed through ten principles. Objective MF O1 of the LDP has adopted these ten principles as detailed hereunder:

- 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. The LDP zones this part of the site as a 'local centre'. 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 development proposals is accompanied by detailed drawings and a detailed Architectural Design Statement, prepared by EML Architects, which provides a rationale for the design of the proposed scheme and the dwelling types proposed.

A Site Layout Plan is detailed in Figure 5.0. A summary of the description and nature of development is provided hereunder:

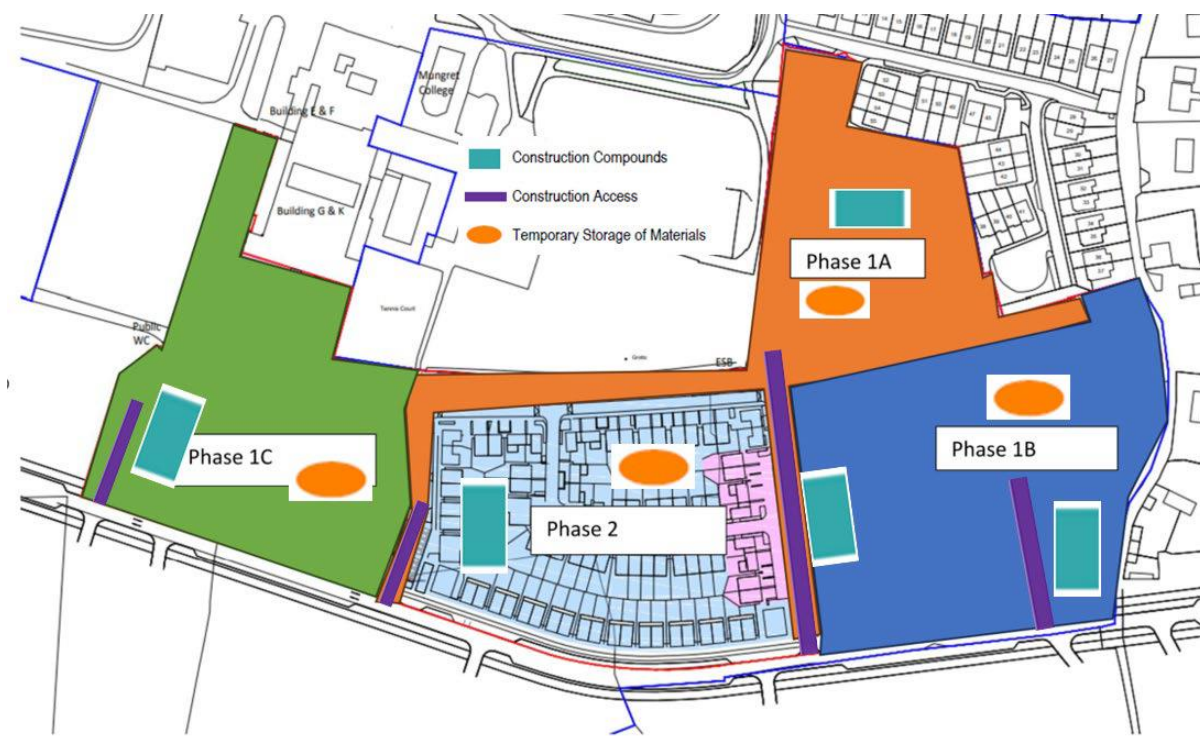
- 250 no. residential units including 36 no. two bed houses; 108 no. three bed houses; 25 no. four bed houses; 2 no. five bed community dwellings; 37 no. two bed apartment units; and 42 no. one bed apartment units,
- House design will accommodate renewable energy design measures (which may be provided externally) for each housing unit;
- A crèche facility with capacity to accommodate 70 no. children and a community facility with ancillary café (coffee dock) of 35sqm net floor area;
- 2 no. community facility units 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.



Figure 5.0 Site Layout Plan – Source: EML Architects

## 4.2 Phasing

Construction of the proposed development is likely to be completed over approximately five years and will be carried out in four phases. Activities within or across the phases may be carried out staggered or simultaneously depending on how the contractor chooses to construct the scheme. The four construction phases are identified as Phase 1A, 1B, 1C and Phase 2. These phases are illustrated in Figure 6.0.



**Figure 6.0** Proposed Phasing Strategy

Phase 1A will commence with the construction of 26 residential units on the northern section of the site. All construction access will be via the Mungret Link Road, which is due to be completed shortly. The public open area will be completed as part of the works within this Phase. It is anticipated that this phase will commence in Q4 2024 and it is estimated that the construction of Phase 1 will take 2 years to complete.

Phase 1B is expected to commence in Q1 2026 and will consist of the construction of 73 residential units (to the south of the 26 units planned as part of Phase 1A). During Phase 1B). Phase 1B will take approximately 12 months to complete and expected to start approximately 4 months before Phase 1A is completed.

Phase 2 will consist of the construction of residential units and will complete the works on the site, with an anticipated commencement date of Q1 2027. It is estimated that Phase 2 will be completed in the 12 months following completion of the Phase 1B.

Phase 1C will commence with the construction of 55 Independent Living for Older Persons units in the western part of the site and the construction of creche/community centre and 12 no. overhead apartments. Approximately 700m<sup>2</sup> of the Public Square (S1) will be construction during Phase 1C along with the remaining public open space located to the southeast of the site. It is estimated that construction

of Phase 1C will take approximately 18 months to complete, with a likely commencement date of Q1 2025.

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 upon expiration of their respective planning permissions.

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.

#### 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. 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 Limerick Development Plan.

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 1.16 hectares. This represents 16 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 LDP. The proposed development results in a net residential density of 40.5 no. units per hectare based on a net site area of 6.1 hectares.

Development Statistics	Gross	Net
No. of Residential Units	250 units	
Gross Site Area	7.2 hectares	6.17 hectares
Density	35 units per hectare	40.5 units per hectare
Building Height	2 - 3 storeys	
Public Open Space	1.16 hectares (16%)	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 LDP. The 'anchor' for the development is the proposed Link Road, yet to be operational but which is under 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 LDP and the Framework Plan prepared for Mungret.

The proposed development provides for 250 no. units and the units are intended to provide for a mixed-tenure development as follows:

- 55 apartments for elderly social - 22% of residential units
- 2 Community Dwellings for Decongregation (social) - 1% of residential units
- Private Affordable tenure for sale - 181 units - 72% of residential units
- 12 apartments over creche (private rightsizing) - 5% of residential units

The range and mix of units will ensure that the proposed development caters for and provides for different household typologies in a sustainable and community-based manner.

The development comprises 171 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, community facilities 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 distributed throughout the development which comprise 3 no. apartment units each. These are arranged over 3 storeys with a single storey two-bedroom apartment above 2 no. 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. 5 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 such as Bawnmore or Lisnagry. 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 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 along with the two other community rooms adjoining the public square, 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.

#### 5.4 Public Realm & Open Space Provision

The development proposes the creation of a series of urban and landscaped public spaces. In accordance with Section 11.3.6 of the LDP, the development accommodates a reduced level of active public open space (7.5% of the net developable area) having regard to the location of the proposed residential development neighbouring Mungret Neighbourhood Park. Serving the proposed development there are:

1. Four 'Pocket Parks' which have been integrated into the landscape framework in accordance with *Objective SCS1 O21 Improve Open Space Provision* and *Table DM 2: Open Space Hierarchy within Residential Estates* of the LDP. The existing Mungret Park serves as a 'Small Park' and 'Local Park'. It is within 400m of all proposed homes within the proposal.
2. A pedestrian pathway and cycleway are provided at two locations. One is facilitated along the northern site boundary providing a link between the residential development and the new Urban Square and community facilities including the creche. The other is facilitated by Mungret Woods provided access to Mungret Park. 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 LDP (Objective SCS1 O21 ). 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 the proposed development provides for 7.5% of public open space within the net developable site area and 16% within the gross site area (red line boundary).

## 5.5 Access & Parking

### Access

Vehicular access to the development will be from the proposed Mungret Link Road. A Traffic & Transport Assessment (TTA) has been prepared by ARUP 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 is under construction and is due for completion in Q1 2025. 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 LDP and was agreed in principle with the Traffic & Transportation Section. A total of 383 no. car parking spaces have been provided to support the development proposal which is below the maximum number of 426 spaces permitted in the development plan. (See Tables 5.0 & 6.0). The parking strategy for the housing and apartment units on Plots 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. The parking strategy has had regard to existing and future public transport provision in the area.

The area is currently served by four local bus services: the 301, 314, 304 and 304A. Along the R510, the 301 inbound and outbound bus stops (stop 311661 and stop 609331) are 190m from the site access. The NTA's BusConnects Limerick programme to review the bus services for Limerick has presented a significant change to public transport routes and their frequency in the area. Under the proposals the subject site will be served by a new bus route operating a 30-minute frequency on routes through Limerick City Centre.

With respect to cycling, the Mungret Link Road road under construction will include a footpath and separate cycle track on both sides of the road. This new infrastructure will be complemented by proposals for a new cycle network under the Limerick Shannon Metropolitan Area Transport Strategy (LSMATS). A route from Mungret to the City Centre has been identified as a primary radial cycle route. The proposed primary cycle route travels along the R510, R526, Ballinacurra Rd, South Circular Road and Henry Street, which will improve connectivity for cyclists between the proposed site location and Limerick City Centre

### Car Parking Breakdown Plots A1 – A3

A total of 280 no. car parking spaces are provided in Plots A1 – A3 as detailed in Table 3.0. A balance of on site curtilage parking, on-street assigned parking and visitor parking 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. Within the 280 no. spaces, a total of 10 no. EV charging points are provided, in excess of the Development Plan requirement of 1 fully functioning EV space per 5 no. multi unit car parking spaces.

Unit Size	No. of Units	Car Parking Standard	No. of Spaces Permitted
2 beds	36	1.5 space per unit	54
3 bed	108	2 spaces per unit	216
4 bed	25	2 spaces per unit	50
2 bed Maisonette (2 per building)	8	1 space per unit	8
2 bed Apartments (1 per building)	4	1 space per unit	4
Visitor/ short term (2 bed apt / maisonette)		1 space per 3 no. unit	4
4+1 bed Community House	2	2 spaces per unit	4
Total Car Parking Spaces Permitted			340
Total Car Parking Spaces Provided			280

**Table 3.0** Car Parking Calculations Plots A1 – A3

#### Car Parking Breakdown Plot A4

A different approach is adopted for Plot 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 Approved 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 creche and the community facilities. 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 4.0. Importantly the apartments, creche and community facilities are provided with full car parking in accordance with development plan standards, whilst reduced parking at a rate of 0.5 spaces per unit is provided for the Older Persons Apartments. A total of 20 no. EV spaces are provided in this part of the site, in excess of Development Plan requirements.

Type	No. of Units	Car Parking Standard Applied	No. of Spaces Permitted
Independent Living Units	55	0.5 space per unit	27.5
Visitor/ short term for elderly units		1 space per 6 no. units	9.17
2 & 1 bed apartments	12	1 space per unit	12
Visitor Apartment	12	1 space per 2 units	6
Creche	13 staff plus 70 children	1 space per staff plus 1 per 5 children	27
Community Space	195sqm gross	1 space per 100sqm	2
Total Car Parking Spaces Permitted			83.54
Total Car Parking Spaces Provided			94

**Table 4.0** Car Parking Calculations Zone 1C

Cumulatively, the development site comprises a total of 374 no. on-curtilage and on-street car parking spaces. A total of 30 no. electric vehicles charging points will be provided on site and 13 no. accessible bays. Communal car parking spaces will be planned to accommodate the infrastructure to facilitate the future roll-out of EV charging facilities to each parking bay.

### Bicycle Parking

A total of 349 no. bicycle parking spaces have been accommodated on site, well in excess of the requirements in the Limerick Development Plan 2022 – 2028. In addition to 1 no. on site bicycle space accommodated within the curtilage of own door houses, provision has been made for an additional 166 no. bicycle spaces to accommodate multi units, the creche and community facilities.

The 55 no. Independent Living for Older Persons Units are provided with 14 no. bicycle stands. The 12 no. apartments overhead the creche and community building are served with 4 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.

## 5.6 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 completed 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 the 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 that 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.

## 5.7 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 LDP and detailed in Objective CAF O6.

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.

## 5.8 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 EH O35 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 EH O35 in the LDP. A Method Statement for these repair works is presented in accordance with the principles of Objective EH O34 of the LDP.

## 6.0 ENVIRONMENTAL APPRAISAL

The development strategy and design approach has been influenced by a number of environmental variables and considerations on the site. It is noted that both the Screening for Appropriate Assessment

and the Environmental Impact Assessment Screening Reports were previously referred to An Bord Pleanála for determination under Article 250(3)(b) and Article 120(3)(b) of the Planning & Development Regulations 2001 as amended, in respect of the previous Part 8 development on the site (ABP309556-21 and ABP309557-21) .

In respect of the AA Screening An Bord Pleanála determined that:

*“It is considered reasonable to conclude that on the basis of the information available, which is considered adequate to issue a screening determination, that the proposed development, either individually and in combination with other plans or projects, would not be likely to have a significant effect on River Shannon and River Fergus Estuaries SPA (site code 004077) and Lower River Shannon SAC (site code 000365), Curraghchase SAC (site code 000174), Tory Hill SAC (site code 000439), Askeaton Fen Complex SAC (002279), in view of the conservation objectives of these sites and that a Stage 2 Appropriate Assessment and the submission of a Natura Impact Statement for the proposed development is not, therefore, required”.*

In respect of the EIAR Screening, An Bord Pleanála determined that:

*“It is considered that the proposed development would not be likely to have significant effects on the environment and, accordingly, that the preparation and submission of an environmental impact assessment report is, not, therefore, required”.*

Having regard to the above, with respect to the proposed built form and infrastructure provision, the only significant change proposed to the development is the omission of 3 no. residential units and the enhancement of SUDs measures on site. Accordingly, the nature of development to be assessed from an AA and EIA Screening perspective, largely remains unchanged and the conclusions as determined by An Bord Pleanála remain unchanged.

## 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 be likely to have a significant effect 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.

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

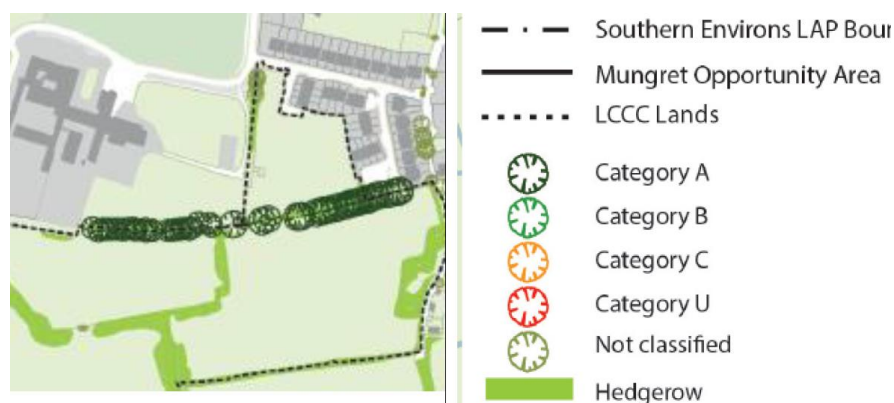
effect on the environment in which the works are proposed are unlikely in terms of population and human health, biodiversity, landscape and visual, groundwater-dependent features and air quality.

Based on the assessment undertaken and using the checklist outlined in the EC guidance on EIA Screening it is concluded that the proposed development is unlikely to have significant adverse effects on the environment

### 6.3 Tree & Hedgerow Survey

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 undertaken in 2018 was verified by a further walkover of the site in 2023. 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 8.0 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, all in accordance with Objective EH O10 which seeks to retain and protect amenity and biodiversity value of the County and City by preserving as far as possible trees, woodlands and hedgerows. The retention of existing tree cover is a priority for the development, not just for the amenity and ecological value, but also because of the carbon storage capacity of older trees. The proposed Landscape Plan proposes various elements for different purposes including as a ground layer for pollinators and a tree or shrub layer for amenity or ecological purposes.



**Figure 7.0** Tree & Hedgerow Survey

Specifically, the Arboricultural Impact Assessment confirms that the arboricultural impact of the development is low, with only one tree 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.

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.

#### 6.4 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 all in accordance with LDP Objective EH O36. It is not envisaged that the proposed development will result in significant effects on archaeology and architectural heritage.

#### 6.5 Bat Survey

In June and July 2023 a bat survey of the site was undertaken by Ecofact to ascertain whether bats or their roosts were present on the site and to determine if bats use the site for foraging or commuting.

The survey confirms that no bats were found roosting in any of the trees or structures within the site boundary during the current survey. However, some of the trees on the site may be used to some degree for roosting by a nominal number of individual bats. This is typical of any trees that have bat roost features such as ivy coverage. However, the main tree lines on the site are composed of non-native Black Pine trees and they have limited roosting potential. The numbers of bats observed foraging and commuting within the site's boundary was relatively low. The species recorded were Common Pipistrelle, Soprano Pipistrelle, Brown Long-eared Bat, and Leisler's Bat. The latter species was seen foraging at a significant altitude over the site but did not rely on it. The other species, while not roosting onsite, were present in relatively low numbers. The report concludes that these bats were originating from roosts beyond the site boundaries and were entering the site for foraging and commuting purposes.

Overall, the report concludes that the site is of relatively low importance to bats, with no roosts recorded during the current survey. While it is utilised by four bat species for foraging and commuting, their numbers and activity levels are generally low.

#### 6.6 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 Climate Action Plan 2023

On 21 December 2022, the Government launched its Climate Action Plan 2023 (CAP23) its second annual update to Ireland's Climate Action Plan 2019, the first CAP to be prepared under the Climate Action and Low Carbon Development (Amendment) Act 2021, and following the introduction in 2022 of economy-wide carbon budgets and sectoral emissions ceilings.

The plan provides for the implementation of the carbon budgets and sectoral emissions ceilings, and establishes a roadmap to halve national greenhouse gas emissions by 2030 and achieve net zero no later than 2050.

On the role of the public sector, CAP23 states the following:

*"The public sector will play a leadership role in driving far-reaching climate action across its buildings, transport, waste, and energy usage, as well as wider society. This will include reducing emissions by 51% by 2030 and increasing the improvement in energy efficiency in the public sector from the 33% target in 2020 to 50% by 2030, as well as increasing climate literacy in the public sector, implementing green public procurement and retrofitting public sector buildings."*

CAP23 acknowledges the role of waste prevention and the circular economy in driving down greenhouse gas emissions *"through maximising the efficiency of our material use"*. It identifies key actions related to circular economy and waste, including the implementation of the WAPCE and Whole of Government Circular Economy Strategy, and the prevention of plastic, food, construction and commercial waste. It states that *"Avoiding waste in the first instance is a climate action we can take every day"*.

Chapter 14 of the CAP specifically addresses the role of built environment in decarbonisation. It notes that the sector accounted for 12.3% of Ireland's greenhouse gas emissions in 2021. The residential sector accounts for the majority of these – at 10.2% of total emissions. To play its part in achieving these targets, the residential sector will need to reduce its emissions by ~20% by 2025 relative to 2018 levels. CAP23 sets out key decarbonisation targets for the built environment sector as follows:

- All new dwellings designed and constructed to Nearly Zero Energy Building (NZEB) standard by 2025, and Zero Emission Building (ZEB) standard by 2030;
- Equivalent of 120,000 dwellings retrofitted to BER B2 or cost optimal equivalent by 2025, and 500,000 dwellings by 2030;
- Up to 0.8 TWh of district heating installed capacity by 2025, and up to 2.5 TWh by 2030;

A Circular Economy Statement prepared by ARUP for the development has established a number of objectives for the site, specifically to:

- Reduce resource use and waste generation associated with the construction and operation of the proposed development;
- Keep products, materials and components used in the proposed development in use for as long as possible during their lifecycle; and
- Promote regenerative design in the proposed development.

## 7.2 Sustainable Urban Housing: Design Standards for New Apartments 2022

The *Sustainable Urban Housing: Design Standards for New Apartments 2022* 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, following the emphasis on 'Universal Design' in the Sustainable Residential Development in Urban Areas Guidelines of 2009, the Limerick Development Plan Core Strategy aligns with the national policy on sustainability. It proposes the concept of a "10-minute city/town," focused on creating compact, versatile neighborhoods and towns. These areas aim to support diverse jobs, services, and housing, strengthening economies and communities while fostering sustainable transport modes. The plan includes guidance on housing densities, building heights, and development layouts to ensure effective land use and the development of quality neighborhoods. This approach not only caters to efficient urban planning but also aligns with the broader goal of sustainable travel patterns and choices, benefiting all inhabitants, including those in rural areas. The proposed development has been advanced in the context of the LDP. 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 16 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 40.5 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 Development Plan 2022 - 2028

The Limerick Development Plan 2022 – 2028 (LDP) is the pertinent statutory document guiding development at a site-specific level in the area. The subject site is identified as an ‘Opportunity Area (Site 5), an area identified for growth. The promotion of housing in the Limerick Development Plan is detailed in Chapter 4, specifically in the introduction section 4.1. This part of the plan outlines the policies and objectives for providing housing in Limerick and emphasises that housing delivery must comply with the Core Strategy (Chapter 2) and align with the principles of the Spatial Strategy (Chapter 3). The section also acknowledges the challenges faced by Limerick, similar to the rest of the country, such as the housing crisis, supply shortages, increased demand for social and affordable housing, a pressurised rental sector, rising building costs, and vacant homes.

Under Section 4.2.3 of the LDP titled "Housing Mix" the need for a variety of dwelling types and sizes to cater to the projected population growth and the establishment of sustainable residential communities is highlighted. It highlights the importance of addressing the diverse housing needs of both the existing and future population, guided by principles like universal design, adaptable housing designs, and Lifetime Homes in new developments. The section also provides for Objective HO O1 which aims to ensure that new developments are socially inclusive and provide a wide variety of housing types, sizes, and tenure. The tenure mix within the development has had regard to these requirements, targeting the provision of both social and private affordable tenure for sale, including 22% of units for the elderly as social housing; 1% for decongregation (social); 72% as private affordable tenure for sale; and 5% as private rightsizing units.

For Mungret, the LDP identifies the potential to deliver significant population growth. This development is supported by funding through the Local Infrastructure Housing Activation Fund (LIHAF) to facilitate the construction of a Link Street and 250 dwelling units, with all dwellings strategically located within 100 meters of a pocket park and 400 meters of a small park. The development proposal seeks to fulfil this requirement.

The proposed development has been designed taking the aforementioned objectives into account. Located on primarily residential zoned land, with a defined local centre zoned area south of Mungret College, the development has been advanced with the specific intention of facilitating social integration and a mix of housing units. The site is located within Zone 3: Suburban Edge, where a minimum net density of 35+ dwelling units per hectare is required as per LDP Section 2.3.5.2. The development proposal seeks to provide a net density of 40.5 units per hectare, all in accordance with the principles of relevant Guidelines promoted in the Plan.

In respect of archaeological features on site, the development has been progressed in accordance with a number of policies in the LDP including Objective EH O36 where it is an objective of the Council to seek the preservation of all known sites and features of historical and archaeological interest. This is to include all the sites listed in the Record of Monuments and Places as established under Section 12 of

the National Monuments (Amendment) Act 1994. The preferred option is preservation in situ, or at a minimum preservation by record.” Further Objective EH O41 states it is the objective of the Council to “preserve and enhance as appropriate and as funding allows monuments vested in the Local Authority”

In terms of open space provision, the LDP provides a relaxation where development is located in proximity to a neighbourhood park. In accordance with Section 11.3.6 of the LDP, the development accommodates a reduced level of active public open space having regard to the location of the proposed residential development neighbouring Mungret Neighbourhood Park. Having regard to the proximity of the subject site to Mungret Neighbourhood Park, the proposed development provides for 7.5% of public open space within the net developable site area and 16% within the gross site area (red line boundary).

## **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 LDP identifies the Mungret area as a future development area. The core strategy settlement structure provides for the provision of 11,054 housing units between 2022 -2028 having regard to the extent of land that is zoned. There is an identified need for housing in the city and the proposed development at Mungret seeks to satisfy some of this demand.

The land use zoning objectives as set out within the LDP primarily affords a ‘*new residential*’ zoning to the land. The LDP 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 (coffee dock) facility. There is a section of the site zoned as a local centre, comprising the area around the proposed public square. A number of community facilities have been provided in an attempt to activate the public square and provide services to the local community. The proposed development conforms to the zoning provision of the land and therefore must be deemed acceptable in principle.

The vision for Mungret is expressed through ten principles detailed under Objective MF 01 of the LDP. As already discussed under Section 3.1 of this report, the development proposal has been designed having regard to the principles established under the Framework.

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 2022 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 40.5 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 40.5 dwellings per hectare falls within the range of density provisions promoted in the Guidelines.

Objective HO O2 provides for increased residential density in the exercise of its development management function and in accordance with Table 2.6 Density Assumptions per Settlement Hierarchy. A minimum net density of 35+ dwelling units per hectare is required for sites in suburban development areas that do not meet the proximity or accessibility criteria of Intermediate Urban Locations. 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 40.5 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 35+ units per hectare promoted in the LDP 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 and cycle track is provided from the site through Mungret Woods providing access to the existing neighbourhood park. 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 LDP 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.