

**05/12/2024**

**Groody Developments Limited**  
**c/o Mary Hughes,**  
**HRA Planning, Chartered Town Planning & Environmental Consultants Ltd.,**  
**3 Hartstonge Street,**  
**Limerick.**

**By E-mail:** [mary.hughes@hraplanning.ie](mailto:mary.hughes@hraplanning.ie)

**LRD PRE-PLANNING REF:**      **24/599961**

**LOCATION:**   **Groody and Dublin Roads, Newcastle, Castletroy, Co. Limerick**

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Dear Sir/Madam,

The Planning Authority refers to your request pursuant to section 32B of the Planning and Development Act 2000 (as amended). Section 32D of the Planning and Development Act (as amended) provides that the Planning Authority shall provide an opinion as to whether or not the documents submitted for the purposes of the meeting constitute a reasonable basis on which to make an application for permission for the proposed LRD.

Following consideration of the issues raised during the consultation process the Planning Authority is of the opinion that the documentation submitted requires further consideration and amendment to constitute a reasonable basis on which to make an application for permission for the proposed LRD.

Pursuant to article 16A(7) of the Planning and Development Regulations 2001 (as amended), the prospective applicant is hereby notified that, in addition to the requirements of articles 20A, 22 and 23, the following specific information should be submitted with any application for permission:

1. The applicant is advised that the following is required to be submitted with the application:
  - a) Details of all proposed finishes and materials including samples/photos as appropriate to be submitted.
  - b) Details of all proposed all internal boundaries proposed and site boundaries including along all public roads and adjacent lands.
  - c) The proposed open external bin store is not acceptable. Revised drawings to show closed and secure bin store should be submitted as well as confirmation of the

operation and capacity of same. Details of proposed screening to ensure it is not visible from the internal road or public road should also be provided.

- d) In relation to the proposed park to be provided within the Groody Wedge, public access from the Dublin Road shall be facilitated to include the provision of a walkway/cycleway through the site to increase pedestrian/cyclist permeability through the site.
2. The following documents were not submitted, these documents should be submitted with any planning application:
    - a) An Architectural Design Statement,
    - b) A Wind Microclimatic Study.
  3. A review of the submitted Environmental reports, has identified a number of issues, as follows, which should be addressed prior to submitted a planning application.
    - a) The screening and NIS would benefit from a figure depicting the red line boundary of the site.
    - b) The reports would also benefit from tables depicting the pertinent species records. The reports should also detail if the records were taken from the site alone or provide measurements e.g. Tetrad for where the records came from. At the moment the reports state "the vicinity of the site". This has been done for the bird species of the SPA but not species like Otter for the SAC.
    - c) I would question the validity of the record for bottle nose dolphin *Tursiops truncatus* in the vicinity of the site cited in the AA and the NIS doc. If these records are included because the author believes that the pod that inhabits the estuarine habitats near the Shannon mouth is within the ZoI of the project then this should be expressly stated, rather than "in the vicinity".
    - d) Furthermore, if the author believes, as stated in the NIS that threats to water quality may impact bottlenose dolphin through indirect pathways on water quality, then other species that utilise the estuarine habitat food webs should be considered among the QI species that could potentially be impacted.
    - e) NIS report p19 para 3.1.2 otter, the report states "There are no direct pathways identified of impact from the proposed development that would impact on the Otter population of the Lower River Shannon SAC". This statement is difficult to defend.

There was a site visit that didn't detect otter however, the SAC is approximately 800m from the site. This is well within the ranging capabilities of otters normally resident within the SAC or at the very least in interaction with the SAC population. The author should consider rephrasing this statement.
    - f) Mitigation measures should be laid out precisely and clearly, e.g what gauge of protective material like geotextile or silt fencing should be used. Where the term "managed appropriately" is used – please describe this measure, as these will be considered when reviewing the application for grant/refusal and will be specified on any planning grant if considered appropriate/adequate.
    - g) In the EcIA there are a number of mitigation measures put forward. These are welcome. In the pre-planning meeting there was mention of a biodiversity pond. All that is mentioned in the EcIA is a bio-swale, constructed wetland and rain

gardens. Are one of these features the pond that was described? If so it should be described clearly in this report.

- h) Given the site has been considered poorly suitable for reptiles and amphibians, and given a water feature is to be installed. The installation of habitat suitable as hibernacula or refugia for these species would be a welcome addition to the ecological enhancement and landscaping of the project.
  - i) As the landscaping plan uses planting of species to enhance the proposed area, this has been reviewed also. The used of fertilisers and herbicide should not occur in close proximity to the aquatic habitats on site.
  - j) The landscaping plan suggests that the establishment of particular species of plant described as “noxious weeds” will not be permitted. Plant species such as all thistle species and ragwort are extremely valuable from a biodiversity viewpoint and are extremely important to many pollinator species.
  - k) No non-native species that can spread of its own accord should be used during planting.
  - l) All planting should be Irish species of Irish provenance.
4. The Council is currently undertaking the preparation of a Blue Green Ring Masterplan and the Groody Valley is a key element to the overall proposal. The proposal should illustrate the connections of the proposed development with the project and in particular public access points.
  5. The pedestrian access at the Northern end of site towards Dublin Road and UL should be a minimum of 3m, similarly the pedestrian access onto the Groody road should be a widened to 3 meters in width to provide shared access for cyclists and pedestrians.
  6. In terms of access to visitor bike parking, uncovered bike stands within the public realm close to the buildings would be welcomed.
  7. A revised MMP plan should include the following in addition to the requirements of the NTA’s guide for Work Place Travel Plans;
    - The name of travel plan coordinator
    - Details of student welcome pack. The output of the Mobility Management plan should inform future residents on the potential of the location for active travel options.
    - The provision of Go-car car sharing facilities and bike park sharing facilities or similar would be welcomed.
    - Targets for year 3 and year 5 including raised targets for cycling as per the NTA’s guidance.
  8. EV bike parking along with a shared bike parking scheme would be beneficial particularly as the UL campus is large with multiple off campus locations that students may need to access, the bike should be the preferred mode of transport for the longer local journeys.
  9. Additional details including revised drawings as appropriate should be included for the following:

- a) Stage 1 Road Safety Audit shall be signed by appropriate person.
  - b) The Applicant shall demonstrate how the overhanging of vehicles will be prevented to ensure pedestrian particularly VRU's will not be impeded in the interest of safety.
  - c) Show the junction at the roundabout designed in line with the current "National Cycle Manual".
  - d) Formal pedestrian crossings, including dropped kerbs and tactile paving, should be provided at pedestrian desire lines between the proposed parking spaces and the opposite footpath adjacent the main apartment block entrances.
  - e) There is natural pedestrian desire line between the proposed development and the shops/residential developments on the eastern side of Groody Road, the provision of a pedestrian crossing at this location should be considered.
  - f) A footpath should be provided on the western side of Groody Road.
  - g) Measures should be provided to support the safe movement of pedestrians between the proposed development and developments on the eastern side of Groody Road. Show a controlled crossing from the development site across the Groody Road in the interest of safety. Full details of the crossing shall be shown. This is a bus route, therefore the Applicant shall keep this in mind if a raised crossing is to be included in the design.
  - h) Show adequate forward visibility for drivers on the approach to and throughout, the horizontal curves.
  - i) Show road and footpath widths and car parking dimensions.
  - j) The Developer shall ensure that any planting within the proposed development does not interfere with sightlines.
  - k) A minimum of 10% of all public realm car parking spaces should be provided with functioning electric vehicle charging stations/points and the space dimensions shall comply with ZEV Universal Design Guidelines. Ducting shall be provided for all remaining car parking spaces, facilitating the installation of electric vehicle charging points/stations at a later date.
  - l) Road Markings are to be in accordance with "IS EN 1436 European Standard for Road Markings" & in accordance with the "Traffic Signs Manual". Road Signs are to be in accordance with "IS EN 1436 European Standard for Road Markings" & in accordance with the "Traffic Signs Manual".
10. A lighting design in line with Limerick City and County Council's Public Lighting Specification shall be submitted.
11. a) Drawings and supporting information showing compliance with Limerick City and County Council's Surface Water & SuDs Specification shall be submitted including revised surface water calculations by way of simulation modelling (Causeway or Micro Drainage) as follows:
- Hydraulic modelling shall be submitted for the design of the network at a 1/30 year return period to include all pipelines that requires that no flooding occurs.
  - Hydraulic modelling shall be submitted for the design of the network at a 1/100 year return period to include all pipelines to show that properties are protected against flooding.
  - Hydraulic modelling shall clearly demonstrate that there is sufficient freeboard on the finished floor levels.

- Summary of Critical Results by Maximum Level (Rank 1) for Storm Design for both the 1/30 & 1/100, must include water level result so that we can establish sufficient freeboard.
- b) Show permeable paving for the parking bays, show them connected together with access chambers for maintenance and with overflow system connected to the internal surface water system.
- c) Submit a detailed cross section through the permeable paving showing construction build up for each layer with clear specifications, which shall include for an overflow system.
- d) Submit a detailed cross section through the bioretention features including green roofs and rain gardens, showing construction build up for each layer with clear specifications, which shall include for an overflow system. The discharge levels shall not exceed 2 l/s/ha or Qbar whichever is the greater restriction.
- e) The proposed wetland shall be fenced off in the interest of safety. The design of the fencing shall be submitted.

**Advice Note:**

The applicant is advised that should planning permission be granted, a bat activity survey will be required to enable the assessment of the potential impact of the proposal on bats using habitats in the area. This should be conducted in the oncoming season of optimum survey time for bats (April – September inclusive).

**PLEASE NOTE:**

Under section 247(7) of the Planning & Development Act 2000 (as amended) this Letter of Opinion is valid for 6 months.

Under sections 32E and 247(3) of the Planning and Development Act 2000 (as amended), neither the carrying out of pre-application consultations nor the taking place of an LRD meeting and the provision of an LRD opinion (where applicable) shall prejudice the performance of the Planning Authority of its functions under this Act or any Regulations under this Act or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.

Yours faithfully,



**(for) Senior Planner,  
Planning Development.**