Whitebox Student Campus Castletroy

Statement of Planning Consistency

Groody Developments Limited

January 2025

HRA | PLANNING

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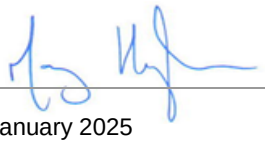
Signed		
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1.0 INTRODUCTION

This Statement of Consistency has been prepared by HRA Planning, on behalf of Groody Developments Limited to accompany a planning application for a Large Scale Residential Development (LRD) comprising Purpose Built Student Accommodation (PBSA) on a site fronting onto the Groody Road and Dublin Road, Castletroy in the townland of Newcastle, Limerick

The purpose of this report is to demonstrate how the proposed development is consistent with proper planning and sustainable development of the area, with particular regard to the provisions of national, regional and local spatial development objectives, planning policies and development standards.

This report should be read in conjunction with the principal drawings and technical specifications prepared by Fewer Harrington & Partners Architects and Garland Consulting Engineers enclosed with the planning application.

The proposed development which seeks the construction of 196 no. bed clusters, is distributed across 5 no. separate blocks, ranging in height from 5 - 8 storeys, with a total of 1,400 no. student bedspaces. Planning permission is sought for a period of seven years under Section 32 of the Planning & Development Act 2000 as amended (the Act).

2.0 SITE DESCRIPTION AND SURROUNDING AREA

2.1 Site Context

Located approximately 3.7km east of Limerick City centre, the site is situated within 1km of the University of Limerick, on a key arterial route (Dublin Road) into the city centre, south east of the Groody Roundabout. The general area comprises a mix of commercial and residential uses. The Dublin Road extending westwards towards the city primarily comprises a mix of commercial uses with the Parkway Shopping Centre and Retail Park situated north of the site, The Groody Road extending south of the site primarily comprises residential uses, including a number of residential blocks accommodating students. The Dublin Road extending eastwards away from the city largely comprises residential uses, whilst the road on the northern arm of the roundabout provides access to the University of Limerick, Castletroy Park Hotel and a number of other businesses in the general area.

The Groody River and associated Groody Green Wedge is located adjacent immediately west of the development site, maintaining a buffer between lands further west and the subject site. The purpose of this area is to maintain the area's importance in preventing the encroachment of the built-up area of Limerick City and to retain its important role as a wildlife corridor and a flood management zone.

The area, already boasts established transportation links, ensuring public transport accessibility for its residents. The general area has excellent connectivity which will be further improved with future Bus Connect routes, intending to link the general area, and the site, with a bus service to the city every 10 minutes. There is a bus stop located immediately west of the subject site on the Dublin Road providing a direction connection to the city. The proposed site is well served by several bus routes including the following:

1. Route 310 on Groody Road – City Centre to National Tech Park. Freq: Every 30mins/7 days
2. Route 304 on Dublin Road – Ballycummin to UL. Freq: every 15mins Mon-Sat, 30mins Sun

3. Route 304a on Dublin Road – UHL to UL. Freq: every 30mins 7 days
4. Route 323 on Dublin Road – City Centre to Casteconnell. Freq: varies

These existing routes provide residents with easy high frequency access to the UL Campus, local amenities and the city centre including the main bus and train station.

The development proposal considers the existing pedestrian, walking and cycling network in the area, in tandem with the implementation of Limerick Bus Connects, to prioritise multi-modal travel within the development. Pedestrian and cycle facilities are provided along the eastern side of Groody Road adjacent to the built up residential areas of Curragh Birin, Brú Na Gruadán and Cois Ghrúda, which are located opposite the site of the proposed development, and on the northern side of Dublin Road in close proximity to the development site connecting the University of Limerick and Castletroy, in the northeast, with Limerick City, in the west.

Car parking on site is minimal and the Limerick city bus network providing services to and from the city centre, Annacotty and Raheen has been considered to encourage a shift towards more sustainable transport options.

Figure 1.0 Site Location & Context

2.2 Site Description

The proposed development site is located in a mixed urban area, adjoining the Groody Green Wedge. The site is bound to the west by Groody River; to the north by the R445 and an existing car dealership, filling station and fuel depot; to the east by Groody Road and to the south by greenfield. The site is relatively flat with a small fall from Groody Road along the eastern boundary of the site to the River Groody. There is approximately a 1-2m fall in level from east to west across the site. The level of the

site adjacent to the existing Groody Road varies from 9.50m OD to 7.50m OD while the levels vary from 9.50m to 6.50m along the northern boundary.

Patches of tall overgrown bushes are scattered throughout the site and evidence of significant ground disturbance was noted mainly along the eastern boundary of the field. Such disturbance was observed in the form of artificially uneven terrain, soil heaps, ground reduction and hardstands. It also appears possible that excess soil from ground excavation was largely spread out towards the middle portion of the field, implying that the subject site might have been landscaped/levelled to a certain extent.

Running adjacent to the west of the site is the Groody River that discharges directly into the River Shannon and therefore the Lower River Shannon SAC and River Shannon and River Fergus Estuaries SAC down river. To the south of the site is a drainage ditch which flows directly into the Groody River. Whilst part of the overall site is located on land that is subject to flooding from the River Groody, the CFRAMS confirms that the area of land where it is proposed to locate all buildings is in Flood Zone C and outside of the identified flood zone.

The site is currently grazed by horses. There are no protected or designated sites in or within the vicinity of the site, including landscape designations.

2.3 Planning History

There is some planning history on the subject site, although none is directly relevant to the subject proposal.

The north eastern corner of the site, fronting the roundabout was granted planning permission for a hotel in 1998 under P98/1033.

A pitch and putt golf course was proposed on land, excluding the north eastern portion fronting the roundabout, in 2008, planning reference 08/1402. However, planning permission was subsequently withdrawn.

3.0 PRE-PLANNING CONSULTATION

3.1 Section 247 Meeting

A pre planning meeting was held with the planning authority on the 18th July 2024, pre planning reference 566691. The development proposal at that time was for 179 no. bed clusters comprising 1,404 no. student bed spaces in 5 no. apartment blocks ranging in height from 5 – 8 storeys. A number of general comments were received in respect of the development proposal including:

- Confirmed that the site is located in a City – Suburban / Urban Extension area as per the Sustainable Residential Development and Compact Settlement Guidelines;
- The planning authority confirmed that the proposed density of development is supported in the Sustainable Residential Development and Compact Settlement Guidelines;
- Draft Acoustic Assessment had been circulated in advance of the meeting. The planning authority advised that this assessment outlined a good compromise and were happy with the intent and mitigation measures proposed, including the provision of a berm adjoining the public road to mitigate noise and the set back of the buildings on the site;

- Proposed parking spaces within the development proposal were too high and are to be reduced;
- Bicycle parking needs to be increased with secure, lockable and covered bicycle parking facilities.
- Need for additional pedestrian crossing on the Dublin Road;
- Any surface water disposal to the Groody River would need an application to the OPW;
- The massing and materiality of the development proposal were deemed acceptable in principle and it was noted that eth Development Plan does provide for a landmark building on the site;
- A Fire Access road to be accommodated to the rear of the site and provided with a grass-crete surface given its location within he Groody Green Wedge; and
- The nature and extent of retail and mix of uses at ground floor level to be clarified as part of any application; and
- Landscaping within the Groody Green Wedge and permeability thoughout the development including to and from the Groody Green Wedge need to be further explored as part of the overall design proposal.

Following the pre planning meeting, the development proposal was revised to incorporate the elements as detailed above. The development proposal was amended to increase the number of apartment units and to decrease the overall number of bedspaces to 1,400. This provided smaller, more intimate apartment units comprising 4 - 8 bedspaces per unit. In addition, the following amendments were made:

- Car parking has been removed from the front of the blocks by the Groody road and throughout the scheme, resulting in a substantial overall reduction.
- Set down areas have been provided outside the lobbies of each block of development.
- The mix and nature of retail and supporting units at ground floor have been rationalised with an emphasis on the provision of active ground floor uses.
- Bicycle stands throughout the scheme – we will refer to development plan for quantity.
- Provision has been made for a public connection route through the development to the Groody Green Wedge. This provides good passive surveillance and will not impact the security/privacy of the student housing.
- A grass-crete roadway has been provided to rear of the building blocks for fire tender access, thereby ensuring the overall objective for the Groody Green Wedge is maintained.

3.2 LRD Meeting

A Section 32B Meeting (P24/599961) was held with the planning authority on the 7th November 2024 and a LRD Opinion was received from the planning authority on the 05th December 2024. A separate report has been prepared which addresses all issues raised in the LRD Opinion and the proposed development has been revised to address issues raised and include additional information sought by the planning authority.

4.0 PROPOSED DEVELOPMENT

4.1 Development Description

The extent of the proposed development on a gross site area of 3.41 hectares of land but with a net developable area of 1.88 hectares (excludes the Groody Green Wedge which is to be landscaped), as described in public notices, provides for a development consisting of 196 no. bed clusters across 5 no. separate blocks, ranging in height from 5 - 8 storeys, with a total of 1,400 no. student bedspaces to be delivered in two phases of development. A seven year permission is sought to facilitate construction. The composition of each block is detailed hereunder:

- Block A comprising 8 storeys provides for 28 no. bed clusters and 224 no. bedspaces; Student library; Student union; Plant room; Bin store; and Bicycle store;
- Block B comprising 7 storeys provides for 52 no. bed clusters and 400 no. bedspaces; Reception & Office; Post room; Laundry room; Student canteen; Maintenance store; Plant room; ESB sub-station & switch room; Bin Storage; and Bicycle store;
- Block C comprising 6 storeys provides for 51 no. bed clusters and 355 no. bedspaces; Student Gym; Maintenance store; Plant room; ESB sub-station & switch room; Bin Storage; and Bicycle store;
- Block D comprising 6 storeys provides for 32 no. bed clusters and 211 no. bedspaces; Reception & Office; Post room; Laundry room; Student canteen; Student supply retail unit (60m2); Plant room; Maintenance store; Bin Storage; and Bicycle Storage;
- Block E comprising 5 storeys provides for 33 no. bed clusters and 210 no. bedspaces; Reception & Office; Laundry room; Maintenance store; Bicycle store; and Plant room.

Planning permission is also sought for use of the accommodation, outside of student term time, for short-term letting purposes. Ancillary site development works including car parking provision; boundary treatments; roof plant; public lighting; water supply; foul and surface water drainage infrastructure; signage; and a temporary construction access to facilitate Phase 2. The site will be accessed via the Groody Road. Extensive landscaping proposals, include landscaped courtyards; (pedestrian and cycle connections from the Groody Road to the Groody Valley Green Wedge; natural landscaping and public walkways within the Groody Valley Green Wedge; and a Constructed Wetland.

The following tables set out the principal detail of the proposed development in terms of landuse and residential numbers and should be read in conjunction with the Architectural Design Statement document prepared by Fewer Harrington & Partners Architects (FHP).

Table 1.0 Schedule of Accommodation						
	Bock A	Block B	Block C	Block D	Block E	Total
No. Storeys	8	7	6	6	5	
No. Bed Clusters	28	52	51	32	33	196
Total No. Beds	224	400	355	211	210	1,400

Table 2.0: Development Areas	
Gross Site Area	3.41 hectares
Net Developable Area	1.88 hectares
Gross Floor Area	42,066.5sqm
Residential Use	30,144.9sqm
Ancillary Support Services	1,566.7sqm
Building Height	5 – 8 storey
Public Open Space	54.7% of overall gross site (1.2 hectares)
Private Open Space (courtyards)	16.4% of net site area (0.31 hectares)
Density	350[1] units @ 186uph net
Plot Ratio	2.04 of net site area
Site Coverage	34.93% of net site area

[1] *4 bedspaces equates to 1 no. unit for density purposes as per Sustainable Residential & Compact Settlement Guidelines*

Figure 2.0 Site Layout Plan

4.2 Design Approach

The scale and layout of the proposed development has been dictated and informed by a number of site-specific physical variables which include;

- Prominent position of the site at a roundabout junction on a significant arterial route (R445 & Groody Road) into Limerick City.
- Existing ad hoc spatial arrangement of the urban form comprising mixed heights and density, including prominent views of the 8 storey block of development (Travelodge) to the west.

- Residential zoning on the land adjoining the defined Groody Green Wedge and the integration required to accommodate and respect both land uses, including the provision of double fronted uses.
- Traffic levels and associated acoustic challenges and the need to comply with the requirements of the Limerick Agglomeration 2024 – 2028.
- Extent of flooding in the general area and the need to develop on land outside of Flood Zone A & B.
- Future requirements of BusConnects and the need to accommodate future public transport provision in the area, including a 4m buffer along the eastern site boundary to accommodate a bus route.
- Integration of nature-based SuDs measures on a restricted site but with the potential to discharge into the Groody River.

The spatial configuration of the above-mentioned variables has been illustrated on the FHP Drawing 'Site Layout Plan'. Garland Consulting Engineers has provided the proposed roads, road markings and signage, swept path analysis, foul drainage network, surface water drainage network and potable water network designs and layouts as part of the engineering design relating to this planning application.

The architect's design statement enclosed with the planning application reflects and states the intention of the applicant through the proposed design, to deliver a high quality student housing development that responds to the existing context and site constraints and which seeks to create an integrated, permeable and sustainable student community. The design and layout adheres to best practice design principles in addition to a response to the physical constraints presented by the site.

A variety of materials are proposed within the development to provide visual interest and to create a distinct sense of place. Textured brick and painted render to a select colour will be the predominant material uses on the elevations with aluminum framed and paneled windows. Glazing will be used throughout the development and particularly focused around the ground floor of the building, providing a visible connection to the Groody Road and Groody Green Wedge. The design rationale is explained in further detailed within the Architectural Design Statement prepared by FHP.

The proposed development has been designed to provide connectivity to and complement the amenity use of the Groody Valley Green Wedge and facilitate creation of a dual frontage landmark building with the highest quality public realm on the approach to the City from Castletroy, all in accordance with the provisions of the Development Plan as articulated in Objective GV 01.

Student Bedspaces

Table 1.0 details the schedule of bedspaces across the five separate blocks of development which range in height from five to eight storeys. The bedspaces have been grouped into different bed clusters units (apartments), ranging in size between four and eight bedroom units. Specifically, the breakdown comprises 32 no. 4 bed cluster units; 5 no. 6 bed cluster units; 30 no. 7 bed cluster units; and 129 no. 8 bed cluster units.

All student bedspaces have been designed in excess of the standards recommended in the 'Guidelines on Residential Developments for 3rd Level Students Section 50 Finance Act 1999' (1999) issued by the Department of Education and Science and the subsequent 'Matters Arising in Relation to the Guidelines

on Residential Developments for 3rd Level Students Section 50 Finance Act 1999.' (July 2005). A Schedule of Accommodation has been prepared by FHP Architects and accompanies the application.

Ancillary Support Services

A total of 1,566.7sqm has been provided at ground floor level in the form of student services, intended to serve students residing in the development only. This comprises just 5.1 pr cent of the overall floor area, well below the maximum 12 per cent promoted in the Guidelines for Residential Developments for 3rd Level Students. It is not intended that such services shall service the general public. The ancillary services are detailed in Table 3.0.

Table 3.0 Ancillary On-Site Services					
	Bock A	Block B	Block C	Block D	Block E
Student Library	161.2sqm				
Student Union	318.4sqm				
Reception & Office		192sqm		192.3sqm	142.7sqm
Post Room		14.9sqm		15.9sqm	
Laundry Room		25.5sqm		29.4sqm	26.6sqm
Student Canteen		165.7sqm		30.8sqm	
Student Gym			191.3sqm		
Student Supply Retail Unit				60sqm	
Total	**479.6sqm**	**398.1sqm**	**191.3sqm**	**328.4sqm**	**169.3sqm**

In addition to the on-site services, the ground floor of each block also provides for bicycle storage facilities, waste recycling and bin storage facilities, maintenance stores, plant room and ESB sub-station.

The Student Library is intended to facilitate group study, allowing for education based meetings for study sessions or group work. The Student Union is intended as a relaxation and internal meeting area for groups and individuals, similar to the external courtyards. The large reception and office area accommodates post boxes for each bed cluster, provides for storage of large items and functions as an informal gathering area.

The Student Canteen provides an alternative to students cooking, offering set meals on a daily basis, whilst the Student Supply Retail Unit will offer basic and daily convenience good provisions such as milk and bread and will provide stationary. The Student Gym will provide exercise equipment and facilities for use by the students.

Waste Storage Areas

Within Blocks A to D a dedicated internal area for waste storage has been integrated within the ground floor of each building, as shown on the architectural plans. A separate enclosed and secure waste storage area building is provided adjacent to Block E to service it as indicated on the architectural site layout plan.

Amenity Space

Significant amenity space is provided as part of the development proposal, comprising private amenity space which is accessible to the students only and public amenity space which is available for use by members of the public.

The three internal courtyards largely comprise the private amenity space, totaling 16.4% of the total area zoned for residential development (net site area). These courtyard areas can only be accessed internally within the blocks of development.

A significant area of public open space is also accommodated as part of the development comprising 1.2 hectares or in excess of 54% of the gross site area (defined in red outline). This area is zoned as the Groody Green Wedge and is intended to contribute to the development of a new city wide amenity area as per Objective SCS1 022 in the Development Plan. Connectivity for pedestrians and cyclists has been facilitated as per requirements under Objective GV 01.

4.3 Access & Parking

Access to the site comprises a fourth arm off an existing roundabout on the Groody Road. A set back has also been incorporated into the development proposal to accommodate a future bus corridor on the Groody Road fronting the site.

A nominal parking provision is proposed onsite including 34 no. car parking spaces and 4 no. EV spaces. It is anticipated that a low number of trips will be generated by the proposed use on a daily basis. These spaces shall largely be used by those working in the complex. Any excess spaces shall be allocated to students based on an application process at the beginning of the academic year, where successful applicants shall be given a permit to park. A set down / pick-up area is included within the site which will be utilised primarily at the beginning and end of university terms, as well as providing access for the disabled and service vehicles. An area for vehicular turning and access has been identified on the accompanying architectural drawings.

Notwithstanding the requirement for 280 no. bicycle parking spaces, a total of 352 no. visitor and resident cycle spaces are provided within secure cycle stores, within each building block, in excess of the Development Plan requirement of 1 space per 5 no. bedspaces. This total comprises 10 EV bike spaces, 36 no. visitor bicycle parking spaces and 306 no. resident bike parking spaces.

4.4 Annual Use

The proposed development will be used for student accommodation only during the academic year and student accommodation and/or tourist/visitor accommodation outside this time.

It is noted that the Department of Housing, Planning, Community and Local Government Circular PL 8/2016 on 'Identifying Planning Measures to Enhance Housing Supply' encourages the use of student accommodation developments for non-student related uses during the non-academic year. It is stated that:

> *"A flexible approach should be applied in respect of any planning conditions related to use/occupation of student accommodation. Such an approach would recognise the need to establish a steady rental income for such student accommodation throughout the year in order to ensure the deliverability of development projects from a funding point of view and recognise that student accommodation complexes can play an important role in providing affordable*

accommodation for tourists and visitors in major urban areas during peak summer demand periods. Therefore, planning authorities should aim to avoid making permissions for student accommodation complexes subject to restrictions on alternative summer or holiday uses, while at the same time ensuring that student accommodation is: not used for residential accommodation of a permanent nature; safeguarded for use by students and other persons related to the HEI during the academic year; and capable of being used for legitimate occupation by other persons/groups during holidays periods, when not required for student accommodation purposes".

The proposed development has been designed to be capable of being used for short term tourist related use during the non-academic year. As indicated in the Circular, the potential for student related uses (e.g. visiting language schools, etc.) and non-student related uses during the non-academic year is an important component of student accommodation schemes to ensure their commercial viability. It is also important to ensure activity in the area and guard against anti-social behavior due to an absence of passive surveillance which would decrease outside of the academic year.

In this regard Section 2 of the Planning & Development Act 2000, as amended, defines student accommodation as: a) a building or part thereof used, or to be used, for the sole purpose of providing residential accommodation to students during academic term times, whether or not provided by a relevant provider (within the meaning of the Qualifications and Quality Assurance (Education and Training) Act 2012), and that is not used, or to be used (*a*) as permanent residential accommodation, or (*b*) as a hotel, hostel, apart-hotel or similar type accommodation other than for the purposes of providing residential accommodation to tourists or visitors outside of academic term times.

Any non-student related use outside the academic year will be managed in the same manner as the student use. The measures set out in the enclosed Management Plan by the applicant will apply to any non-student use outside the academic year.

4.5 Water Services Infrastructure

An Engineering Services Report has been prepared by Garland Engineers which details water service specifications.

Foul Water

A new foul water drainage system will be constructed to collect and convey the foul water flow generated by the development. It is proposed to provide a single gravity foul sewer system for the development, discharging to an existing combined sewer east of the development below the Groody Road

Potable Water

It is proposed to provide a 160mm OD watermain with hydrants and to connect the development to the existing 300mm diameter east of the development below Groody Road.

Surface Water

The management of surface water will be via the use of Sustainable Drainage solutions (SuDs) incorporated into the proposed development including bioretention systems; bioretention swales; green roofs; wetland; catchpit manhole; bypass interceptor; and hydrobrake limiting flow to Qbar greenfield

rates. The surface water runoff rate has been restricted to the greenfield runoff rate and an allowance of 30% climate change and 10% urban creep has been included in the design.

The storm drainage from the car parking spaces roads and footpaths will be collected in gullies and discharged via a traditional storm pipe network to attenuation systems. Given the topography of the site and available green spaces, an attenuation tank cascading to a wetland is proposed. The attenuation tank attenuates the southern section of the development prior to discharging to the wetland. The wetland attenuates surface water flow from the northern section of the development. The attenuated flows from the wetland will discharge to the Groody River via a headwall at the western site boundary a rate of 3.75l/s.

The construction of the no. 2 headwalls on the proposed surface water system within the wetland shall be carried out in close proximity to the River Groody. Prefabricated headwalls are recommended in order to minimise the use of materials that may cause polluting effects to the existing River. The raised earthworks for the wetland will be constructed prior to the installation of the headwalls which will create natural barrier for these works to take place within. The outfall from the wetland will consist of an outfall flow control manhole adjacent to the wetland and a pipe network which will direct the water flow from the wetland to the watercourse. The outfall manhole shall also be prefabricated.

4.6 Construction & Waste Management

Subject to securing consent, it is intended for the main works to commence in Q1 2026. The timeline is indicative at this stage and is subject to change depending on the planning application process and other external factors including existing supply chain constraints at the time of going to market. It is assumed that all construction related activity will be undertaken in accordance with best practice / industry guidance and shall adhere to relevant emission, discharge and noise limit thresholds during construction. An Outline Construction & Environmental Management Plan (CEMP) has been prepared by Garland Engineers in support of the development proposal and will be implemented by the appointed Contractors on site.

Construction operations on site shall generally be limited to standard hours of operation for building sites as follows:

· Monday to Friday 07.00 to 19.00
· Saturday 07.00 to 14.00
· Sundays and Public Holidays no noisy work on site.

It may be necessary for some construction operations to be undertaken outside these times. For example, it may be necessary to make service diversions and connections outside the normal working hours. Deviation from these times may be permitted in exceptional circumstances, where prior written approval has been received from the relevant local authority.

It is proposed to advance the development in two distinct phases as detailed in Figure 3.0 and to facilitate construction a seven year permission is sought, thereby ensuring adequate time to complete the development.

A large proportion of the site has previously been filled with construction and demolition waste, mostly clay with stones and boulders but also containing waste associated with being from construction sites. The envisaged strategy for the site is of segregation and reuse where possible on site but disposal

where required to licensed facilities. A Resource & Waste Management Plan prepared by Garland Engineers sets out the measures used in the responsible disposal of waste arising from the construction of the development. The majority of waste generated at the construction phase will be excavated material, with surplus construction materials and cuts also anticipated.

The Outline Operational Waste Management Plan also prepared by Garland includes a strategy for the disposal of waste within the operational phase of the development. The report presents a waste strategy that addresses all legal requirements, waste policies and best practice guidelines and demonstrates that the required storage areas have been incorporated into the design of the proposed development.

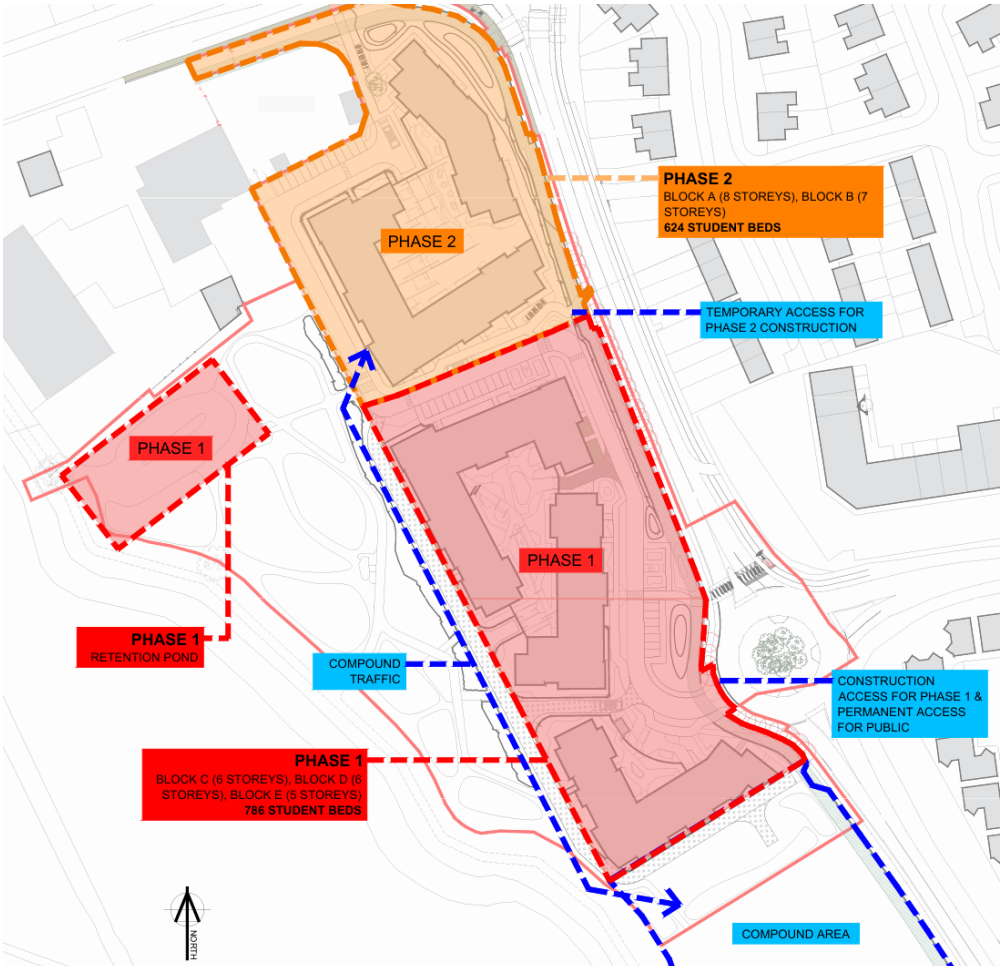

Figure 3.0 Proposed Phasing Strategy

4.7 Taking in Charge

The proposed development shall be managed by a dedicated Student Accommodation Management Company, with a dedicated Property Manager as detailed in the Operational Student Management Plan.

However, it is proposed that the area of public open space, comprising the Groody Valley Green Wedge is taken in control by the Council, for the benefit of the wider public, as detailed in Figure 4.0.

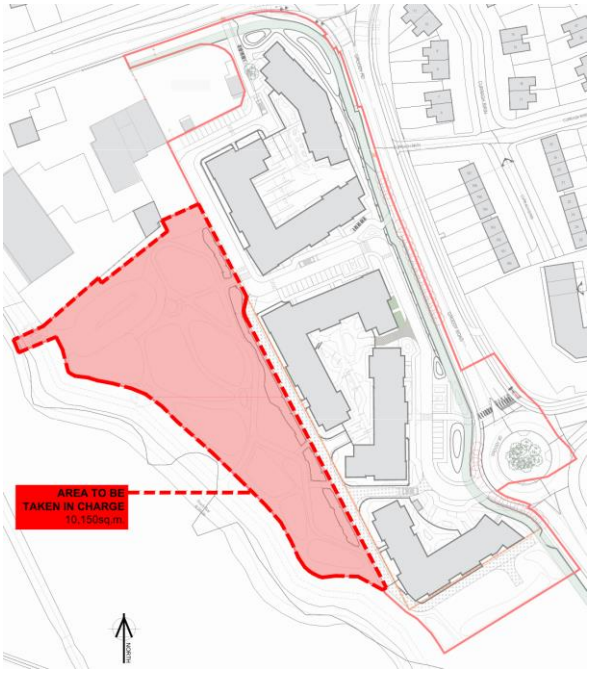

Figure 4.0 Area to be Taken in Charge

5.0 ENVIRONMENTAL CONSIDERATIONS

The development strategy and design approach has been influenced by a number of climatic and environmental variables and considerations on the site. The design has taken an iterative approach to design, addressing and incorporating many environmental considerations as detailed below.

5.1 Sustainability & Climate Action

A Sustainable Energy Report has been prepared by JOT Energy Consultants. The report outlines how the construction and performance of the proposed development will meet or exceed legislative and planning requirements, with particular emphasis on meeting the current Nearly Zero Energy Buildings standards.

The design team has adopted a top down pyramid approach to reduce the demand for energy by designing efficiency into the elements at design stage such as building fabric, glazing, air permeability, HVAC and lighting systems. Whilst the Energy Strategy for the site has yet to be finalised pending receipt of planning permission, the report does provide output specification to set parameters to be achieved and details some systems that will not be allowed. In line with reducing fossil fuels there will be no fossil fuels (Gas or Oil) on the site in line with the Governments 'Climate Action Plan 2024'. Consideration is given to using Air to Water Heat Pumps and Photovoltaic Panels.

5.2 Acoustic Assessment

An inward noise assessment has been undertaken by Traynor Environmental in order to predict the glazing type requirements for compliance with relevant internal noise limits and to determine the requirement for mitigation measures having regard to the level of noise traffic on the Dublin Road fronting the site.

The assessment has demonstrated that the desired intrusive noise levels can be achieved using a high performing acoustic double-glazed unit comprising laminated glass incorporating thicker glazed panes than standard double glazing on windows fronting the Groody Roundabout and Groody Road (minimum 30 dB required), whilst a double-glazed configuration with slightly thicker glass panes than standard double glazing can be used on all other elevations (minimum 37 dB required).

The assessment requires the provision of a 2.5m high soil berm to be installed between the site and two locations on the roadside boundary, fronting the Groody Roundabout on the Dublin Road and the existing roundabout accommodating access to the site.

5.3 Archaeological Assessment

A Desktop Archaeological Assessment has been prepared by John Cronin & Associates which accompanies this planning application. The report concludes that portions of the field to be developed shows evidence of ground disturbance likely caused by previous developments in the recent past. None of the recorded archaeological sites within 1km study area are located within the subject site and no visual evidence of previously unrecorded archaeological heritage was noted.

The subject site is considered to possess a low to medium archaeological potential, and a programme of test trenching within the viable portions of the site is recommended in advance of any site development works.

5.4 Ecological Impact Assessment

An Ecological Impact Assessment (EcIA) was undertaken by Russell Environmental and Sustainability Services Ltd. There are no protected fauna or habitats on site and the habitat value is deemed negligible.

A bat assessment was undertaken during the EcIA site survey on 6th of January 2024, for the suitability of habitats onsite to support bat roosting, foraging and commuting. All trees on site were inspected in accordance with guidance (Kelleher & Marnell, 2006). The treeline adjacent to the drainage ditch was surveyed for suitable trees for bat roosts and it was deemed unlikely that any were suitable as bat roosts. In any event, the trees adjacent to this drainage ditch (at the southern boundary of the site) will remain undisturbed as part of the development.

In addition, there was only one mature tree on site suitable as a bat roost, a White Willow *Salix alba,* which is located on adjoining lands outside of the application site. This tree will remain undisturbed as from the proposed development and will not be impacted by the proposed blue/green infrastructure for the area. Accordingly, it was not deemed necessary to carry out a bat survey.

Bats are undoubtedly using the site for foraging as there are records for a number of bat species (Common Pipistrelle, Soprano Pipistrelle, Daubenton's Bat and Lesser Noctule Bat) in the tetrad grid for the site, Grid R65D. The following measures were included in the EcIA to mitigate for bats using the site:

- *'Any tree removal or undergrowth cutting back should take place during the bat hibernation period (1st November to 1st May). In addition, 'Bat-sensitive lighting' should be implemented for this development and during construction all lighting should be directed away from the treelines and watercourses.*

- *All works to be completed during daylight hours so as to minimise disruption to nocturnal animals.'* (Ress Ltd, 2024)

In addition, there was consultation with the lighting engineer on the design of lighting for the site based on the following guidelines:

- Bat Conservation Trust (2023) *Guidance Note GN08/23 Bats and Artificial Lighting At Night. Institute of Lighting Professionals*. Warwickshire. UK
- Bat Conservation Ireland (2010) *Bats and Lighting. Guidance Notes for: Planners, engineers, architects and developers*. BCI.

According to based practice guidelines (Kelleher & Marnell, 2006) bat surveys are only required when potential roosing features are present and such roosting features are to be interfered with and as the trees on the boundary and the large free standing White willow are not to be interfered it was deemed that no further surveys were necessary.

All measures in relation to bats within the development site are precautionary / enhancement measures. Specific mitigation measures as per the removal of juvenile trees and undergrowth are mitigated for in the EcIA. As per the CIEEM Guidelines for EcIA (2018), protective measures are designed to preserve existing ecological features and mitigate any potential harm before it occurs.

Although there is an inevitable reduction in the area of habitats as a result of the proposed development, the report concludes that the planned landscaping aims to improve the overall biodiversity by species rich habitat creation utilising native species planting and planting for pollinators and management of grassland with differential mowing. Therefore, the proposed development will provide an increase in biodiversity and net gain in the conservation value of the proposed habitats to be created, and there will be no net biodiversity loss as a result of the proposed development.

5.5 Natura Impact Statement

A Natura Impact Statement has been prepared by Russell Environmental and Sustainability Services Ltd. The proposed development site is located outside the boundary of European Sites. No pathways for direct impacts as a result of the development on any of the QIs/SCIs of any European Site were identified. Emissions to surface water were identified as a pathway for potential indirect effect on the Qualifying Interests of the Lower River Shannon SAC and River Shannon and River Fergus Estuaries SPA, including potential surface water pollution/particulate matter during construction and operation of the proposed development.

Mitigation measures to avoid the potential for any significant impacts via any of the pathways identified are detailed in the NIS and as a result the report concludes it can be excluded, on the basis of objective scientific information, that the project, individually or in combination with other plans or projects, will not affect the integrity of the European Sites (Lower River Shannon SAC and River Shannon and River Fergus Estuaries SPA).

5.6 Environmental Impact Assessment Screening

An Environmental Impact Assessment (EIA) Screening Report was prepared by HRA Planning to assess the proposed development and to undertake a determination as to the likelihood of significant effects on the environment, and the requirement or otherwise, for Environmental Impact Assessment (EIA). The proposed development of 196 bed clusters comprising 1,400 student bed spaces, equates

to 350[2] residential units, on the basis that 4 bed spaces equals 1 no. residential unit. Accordingly, the proposed development is below the 500-unit mandatory threshold and represents 70% of the threshold number of residential units.

The site area of the proposed development measuring 3.41 hectares in area is not situated within a business district and is significantly below the 10-hectare threshold for urban development[3] in the case of; 'other parts of a built-up area'.

The site, therefore, does not trigger mandatory EIA.

The preliminary examination confirms that there is no real likelihood that the proposed development, by reason of its 'nature and size' is likely to give rise to significant effects on the receiving environment, save for localised, short-term temporary impacts associated with the construction stage.

However, taking a precautionary approach and consistent with statutory provisions of Article 120 of the Planning Regulations, along with the published methodological guidance which this assessment is based; the information specified in Schedule 7A (of the aforementioned regulations) for the purposes of a screening determination was prepared.

The screening determination was therefore undertaken having regard to Schedule 7 criteria and Schedule 7A information. Having regard to the nature and scale of the proposed development which is below the thresholds set out in Class 10 of Part 2 of Schedule 5, the criteria in Schedule 7, the information provided in accordance with Schedule 7A of the Planning and Development Regulations 2001, as amended, and the following:

- The scale, nature and location of the proposed impacts;
- The potential impacts and proposed mitigation measures; and
- The results of the any other relevant assessments of the effects on the environment

It is considered that the proposed development would not be likely to have significant effects on the environment and it is concluded that an environmental impact assessment report is not required.

5.7 Flood Risk Assessment

The purpose of the Flood Risk Assessment (FRA) prepared by Garland Engineers is to assess the potential flood risk to the proposed development site and to assess the impact that the development as proposed may or may not have on the hydrological regime of the area in accordance with the requirements of the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009). The study was principally focused on examining flooding risks to the proposed site from the Groody River.

The CFRAMS fluvial study and Strategic Flood Risk Assessment undertaken in support of the Development Plan confirms that a small portion of the site is located in Flood Zone A and Flood Zone B.

[2] 4 bedspaces equates to 1 no. unit for density purposes as per Sustainable Residential & Compact Settlement Guidelines

A series of mitigation measures against flooding have been adopted in the design of the development, namely constructing the development within the zoned lands outside the flood zone, maintaining a green open space for the flooding to occur, raising building levels well in excess of predicted flood levels and maintaining access above the flood level from the adjoining existing road in case of emergency. All development within the site is being undertaken within Flood Zone C and the Flood Zone A & B areas are being maintained.

In consideration of the assessment, analysis and recommendations, the overall development of the site is not expected to result in an adverse impact to the existing hydrological regime of the area or to result in an increased flood risk elsewhere.

5.8 Landscape & Biodiversity

The Landscape & Biodiversity Design prepared by Kennedy Fitzpatrick Landscape Architecture Ltd. (KFLA) incorporates wildlife considerations in the retention/ protection/ management and reinforcement of natural features on site and maintenance of the Groody Green Wedge. The tree cover on the site is primarily composed of scrub planting, including small trees and shrubs. Planting and management of the landscape areas shall be undertaken in accordance with pollinator friendly management objectives as outlined in the "All Ireland Pollinator Plan 2021-2025. A coordinated approach within the landscape design has been taken to site services, in particular SUDS integration for water management and habitat creation.

A proposed wetland area enhances local biodiversity, creates unique native habitat and contributes to site drainage. A buffer area is created between the usable space and the wetland area through the provision of a mix of boulders, wetland groundcover planting and copses of trees. The provision of footpaths overlook the wetland and wet meadows extending towards the river. The open lawn area of the Groody Green Wedge provides space for active and passive recreation, with gently sloped footpaths provided through the parkland. The planting of a native hedgerow immediately to the rear of the buildings, adjoining the Groody Green Wedge, provides an effective boundary to the park and creates a Green Infrastructure link across the site.

Varied habitats are created for ecological connections and landscape visual amenity including bio swales; bioretention tree planting pits; rain gardens new tree planting and the wetland area. In addition.

5.9 Landscape Visual Impact Assessment

KFLA prepared a Landscape Visual Impact Assessment with respect to the development proposal. The landscape is deemed to have low to medium. Sensitivity having regard to its zoning provisions in the development plan and surrounding built character. The visual sensitivity of receptors was also determined to be low to medium, with the view from the towpath along the River Shannon (VR14) the only highly sensitive viewpoint. However, only very small glimpsed views of the very upper levels of the buildings will be possible from this view. The impact will therefore be imperceptible.

Overall, the initial change to the landscape that includes built development may be perceived negatively by some people, however due to the surrounding urban and suburban environment this would be considered a continuation of existing and emerging trends in the area. With this considered the impact would be moderate insignificant and long term in duration.

5.10 Daylight & Sunlight Analysis

A daylight/sunlight assessment by 3D Design Bureau has been completed and their report is submitted in support of the proposed development. This includes assessing the daylight/sunlight levels received by neighbouring properties, the proposed student residential units and the external amenity areas. As noted in the Daylight & Sunlight Analysis report an iterative design approach has been adopted to maximise the schemes performance.

Spatial Daylight Autonomy & Sunlight Exposure

In terms of assessing the Spatial Daylight Autonomy (SDA) in the student bedrooms, a higher target lux of 150 lux has been assigned to these rooms because of the study area, as opposed to the normal 100 lux for bedrooms. The SDA compliance with no trees for the proposed development, consisting of habitable 1400 no. rooms, is c. 98 per cent, with 97 no. rooms below the minimum required. With trees the SDA compliance reduces to 92 per cent

In terms of Sunlight Exposure (SE), if this was a typical residential scheme, a unit would be deemed compliant if one or more of the habitable rooms can receive at least 1.5 hours of sunlight on the assessment date, and preferably this would be a living room. Within the proposed development, all student bedrooms are serviced by a common room. As there is no specific guidance under the BRE Guidelines for treatment of such unit types, a cluster has been deemed compliant if the common room meets the Sunlight Exposure (SE) requirements. It is felt that classifying a cluster as complaint if only one bedroom meets the SE requirements, would be too low a threshold for this assessment. Having regard to the 196 no. cluster units proposed, the compliance rate is circa c. 82 per cent with no trees in the calculations or 81 per cent with trees.

Although trees have been shown to reduce the level of daylight access within the residential spaces, they remain a key element of the overall proposal, enhancing local biodiversity and contributing to the creation of amenity areas that offer a balanced blend of nature and residential living.

These favourable results suggest careful consideration to the design layout and in consideration of same, regard must also be had to the following mitigating factors:

- Although some bedrooms do not meet the daylight requirement, it must be considered that a higher assessment level of 150 lux has been used. Further, the size of the bedrooms exceeds the minimum area standard recommended in the Guidelines and this allows for a more spacious, comfortable living environment, with ample room for study and relaxation.
- The communal spaces within each cluster (kitchen, living, and dining areas) are also designed to be larger than the minimum required size, providing students with generous shared areas. The extra space enhances the functionality of these rooms, promoting social interaction and creating a comfortable, open environment for daily activities.
- The clusters are designed with higher-than-average floor-to-ceiling heights, which increases the sense of openness and improves light distribution within the rooms. Even with lower daylight levels, the perception of space and comfort is enhanced, ensuring a pleasant living experience.
- While there is no specific requirement for additional student facilities within the scheme, the development offers significant high quality student facilities on the ground floor. The large windows and open design of these areas ensure access to daylight, creating bright, welcoming spaces where students can spend time outside of their private rooms.

Sun on Ground Analysis

Whilst the three private open space courtyard areas perform poorly in terms of the Sun on Ground analysis (sunlight), which requires at least 50% of the area to have sunlight for 2 hours or more on March 21st, the results can be compensated with the extent of public open space provided in the Groody Green Wedge and which has an overwhelming positive result.

The scheme proposes a large nature walk area along the Groody River, which offers students a natural, outdoor space for exercise and relaxation. This riverside green space provides easy access to daylight, sunlight, fresh air, and natural beauty, helping to offset the reduced sunlight in the private open space area.

Vertical Sky Component & Annual/Winter Probable Sunlight Hours

The effect on VSC has been assessed for 28 no. windows/rooms across the surrounding properties along 6-11 Curragh Birin. Five ground floor windows of the properties along 6 -9 Currgah Birin have a minor adverse impact[3] as a result of the development. Given the scale of the proposed development and the fact that 'minor adverse' impacts occurred only in instances where obstructions were already present in the baseline state, 3DDB are of the opinion that these impacts should be deemed acceptable.

The effect on the APSH of 26 no. windows would be considered 'negligible', and 2 no. 'minor adverse'. The effect on the WPSH of 25 no. of these windows would be considered 'negligible', 1 no. 'minor adverse', and 1 no. 'moderate adverse'. The 2 no. windows adversely affected in terms of both APSH and WPSH are windows 6a and 7b. Both experience a 'minor adverse' level of effect in the annual calculation, while in the winter calculation, window 7b is subject to a 'moderate adverse' level of effect. It should be noted that window 7b has a WPSH baseline value of 2.45%, which is significantly below the minimum 5% recommended by the BRE Guidelines. Consequently, although the reduction recorded is only 1.07%, this represents nearly a half reduction compared to the original value, resulting in an exaggerated level of effect. Following the above considerations, It is opinion of 3DDB that these impact should be deemed acceptable.

5.11 Wind Microclimatic Study

Wind Microclimate Modelling has been carried out for the proposed development by B-Fluid Ltd. The study identified the possible wind patterns around the area proposed, under mean and peak wind conditions typically occurring in Limerick, and also to assess impacts of the wind on pedestrian levels of comfort/distress. The study concluded that the proposed development is designed to be a high-quality environment (i.e. comfortable and pleasant for potential pedestrian), and that the development does not introduce any critical impact on the surrounding buildings, or nearby adjacent roads.

The evaluation of the proposed scenario indicates that the planned development aligns with the Lawson Comfort Criteria, confirming that no areas are unsafe and the proposed development does not create conditions of distress. All the ground and the courtyard amenities outlined in the report can be utilised according to their intended scope.

[3] A 'Minor Adverse' level of effect will be stated if the level of effect is marginally outside of the criteria as stated in the BRE Guidelines. Typically a 'Minor Adverse' level of effect will be applied if the level of daylight or sunlight is reduced to equal or greater than 80% and less than 100% of the applied target value.

6.0 NATIONAL POLICY

6.1 National Planning Framework

The National Planning Framework (NPF) is the Government's plan to cater for the extra one million people that will be living in Ireland, the additional two thirds of a million people working in Ireland and the half a million extra homes needed in Ireland by 2040.

As a strategic development framework, 'Project Ireland 2040' sets the long-term context for our country's physical development and associated progress in economic, social and environmental terms and in an island, European and global context. The NPF states that carefully managing the sustainable growth of compact cities, towns and villages will add value and create more attractive places in which people can live and work. Section 2.6 of the NPF seeks to provide compact and sustainable growth.

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).

- National Policy Objective 13 states - 'In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high-quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected'.
- National Policy Objective 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'.
- National Policy Objective 34 – 'Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time'.
- National Policy Objective 35 – 'Increase residential density in settlements, through a range of measures including reductions in vacancy, reuse of existing buildings, infill development schemes, area or site based regeneration and increased building heights'.

Evaluation of Consistency

The proposed development accords with the NPF in particular with its principles of compact growth and the reinforcement of the country's existing urban structure at all levels. Where housing policy is concerned, the proposed development accords with the NPF's core principles for housing delivery – in particular that the location of new housing be prioritised in existing settlements.

In accordance with the NPF's strategy of compact growth, it is proposed to develop higher density student housing within the existing built-up area of Castletroy on a site identified as being suitable for student housing having regard to the proximity of the site to the University of Limerick and on a proposed Bus Connects route with a 10 minute frequency to the city centre.

6.2 Rebuilding Ireland – Action Plan for Housing and Homelessness

Rebuilding Ireland was launched in 2016 with the objective to double the annual level of residential construction to 25,000 homes and deliver 47,000 units of social housing in the period to 2021, while at

the same time making the best use of the existing stock and laying the foundation for a more vibrant and responsive private rented sector.

Rebuilding Ireland is set around 5 no. pillars of proposed actions summarised as follows;

- Pillar 1 – Address Homelessness: Provide early solutions to address the unacceptable level of families in emergency accommodation; deliver inter-agency supports for people who are currently homeless, with a particular emphasis on minimising the incidence of rough sleeping, and enhance State supports to keep people in their own homes.
- Pillar 2 – Accelerate Social Housing: Increase the level and speed of delivery of social housing and other State – supported housing
- Pillar 3 – Build More Homes: Increase the output of private housing to meet demand at affordable prices.
- Pillar 4 – Improve the Rental Sector: Address the obstacles to greater private rented sector delivery, to improve the supply of units at affordable rents.
- Pillar 5 – Utilise Existing Housing: Ensure that existing housing stock is used to the maximum degree possible – focusing on measures to use vacant stock to
- renew urban and rural areas.

Evaluation of Consistency

The proposed development provides purpose-built student housing which reduces the pressure on the private rental market by proving more appropriate housing for students. The proposal will deliver much needed student housing within the Limerick area in accordance with the aims of Rebuilding Ireland, and in particular Pillar 3, which seeks to build more homes – "to increase the output of private housing to meet demand at affordable prices." The provision of an additional 1,400 no. student bed spaces will provide for managed student accommodation which will free up the pressure on the existing rental market in the area thus making the most of the existing housing stock to cater for much needed rental accommodation

6.3 Housing for All: A New Housing Plan for Ireland

The 'Housing for All: A New Housing Plan for Ireland', reinforces the critical and strategic need for new dwellings where it is a target to provide 300,000 housing units by the year 2030Housing for All - a New Housing Plan for Ireland' is the government's housing plan to 2030. It is a multi-annual, multi-billion-euro plan which will improve Ireland's housing system and deliver more homes of all types for people with different housing needs.

In order to achieve this, Housing for All provides pathways to achieving four overarching Housing Policy Objectives:

- Supporting Homeownership and Increasing Affordability
- Eradicating Homelessness, Increasing Social Housing Delivery and Supporting Social Inclusion; Increasing New Housing Supply; and
- Addressing Vacancy and Efficient Use of Existing Stock.

The government's overall objective is that every citizen in the State should have access to good quality homes: to purchase or rent at an affordable price; built to a high standard and in the right place; offering a high quality of life. The government's vision for the housing system over the longer term is to achieve

a steady supply of housing in the right locations with economic, social and environmental sustainability built into the system.

Evaluation of Consistency

In this regard the proposed PBSA development will allow for new residential community, built to a high standard and quality, which can be rented within an urban centre, with its range of amenities and services, proximity to high quality high frequency public transport services.

6.4 National Student Accommodation Strategy – Rebuilding Ireland (2017)

The National Student Accommodation Strategy (NSAS) published in 2017 points to all current indicators that indicate a significant increase in full time students attending publicly funded Higher Education Institutes (HEI) over the next decade:

> *"The HEA Key Facts and Figures for 2015/2016, published in November 2016, highlighted that there were 179,354 full-time enrolments in Department of Education and Skills (DES) aided HEIs in the academic year 2015/2016 (169,363 of those students attend either a university or an institute of technology). Enrolments have increased from 173,649 in 2014/2015 and from 169,254 in 2013/2014".*

The International Education Strategy has set a growth target of 33% for the higher education sector, which will result in an increase in international students in both public and private HEIs from 33,118 in 2014/2015 to approximately 44,000 by the end of the 2019/2020 academic year."

The Strategy also points out the potential impact of PBSA on the private rented sector:

> *"There are a significant number of students renting from private landlords in Ireland as was highlighted in the National Economic and Social Council (NESC) Report "Ireland's Rental Sector: Pathways to Secure Occupancy and Affordable Supply" which was published in May 2015. The NESC report also outlined that on average, there are 2.73 persons per household in Ireland. While it is likely that the occupancy of a household comprising solely of students is going to be higher than the national average, it is a fair extrapolation to make that every 4 students housed in either PBSA or in Digs will free up an additional housing unit in the private rented sector that would otherwise have been occupied by students."*

In summary the National Strategy identifies that there will be significant continued demand for accommodation and that the delivery of additional PBSA has significant potential to free up housing for other demographics.

The NSAS identified that there was an unmet demand for 23,643 bed spaces in 2017 at a national level, the demand calculation data is based on students attending higher education institutions who have requested on campus accommodation against the number of bed spaces available on campus[1]. The strategy projected that there would be an excess demand of 25,754 bedspaces in 2019 which is set to reduce to 20,986 bedspaces in 2024. The Strategy recognises that in order to comprehensively address the shortfall in student accommodation investment is required from both public higher education institutions and private developers.

The most recent progress report for the NSAS was published in Q3 2019. The report concluded that at the end of Q3 2019, 8,229 bedspaces were completed, 5,245 bed spaces were under construction and 7,771 bedspaces had been granted planning permission, this denotes a total of 21,254 bedspaces[2].

Overall, this represents a shortfall in supply of 4,500 bedspaces based on the demand projections detailed in the NSAS. Whilst it is acknowledged that significant progress has been made in increasing the supply of purpose built student accommodation to meet the demand at a national level, it is evident that additional student accommodation is still required to meet the excess and growing demand.

Evaluation of Consistency

The shortage of student accommodation is happening in the context of the wider housing crisis. There is a need to increase the supply of all types of housing and accommodation, including student accommodation. The proposed development seeks to deliver 1,400 student bedspaces in Limerick to address the shortage identified.

6.5 Climate Action Plan 2024

On 20 December 2023, the Government launched its Climate Action Plan 2024 (CAP24) its third 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.

A broad spectrum of potential actions which can mitigate the effects of climate change as caused by pollution and the overexploitation of natural resources are documented. With regard to the built environment, these measures include the rational siting of urban development, the building of compact, dense and well designed neighbourhoods, and the imposition of higher energy efficiency performance standards. Energy efficiency performance is addressed primarily through the newly introduced Near Zero Energy Building (NZEB) standards, which apply to all homes built since 2019, as well as the traditional Building Energy Rating (BER system). In line with provisions contained within the National Planning Framework, detailed above, the Climate Action Plan maintains that circa 40% of new residential development to 2040 will occur within the environmental footprint of extant built-up areas. Such measures are considered to vastly reduce carbon emission associated with new developments and promote an improved quality of life in Irish cities.

Chapter 14 of the CAP specifically addresses the role of built environment in decarbonisation. It notes that the sector accounted for 11.1% of Ireland's greenhouse gases in 2022, down from 12.3% 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. CAP24 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;
- 170,000 new dwellings using heat pumps by 2025, and 280,000 by 2030
- 45,000 existing dwellings using heat pumps by 2025, and 400,000 by 2030

In response to Climate Action at a national level, Limerick City & County Council recently adopted its Climate Action Plan 2024 – 2029. It identifies targets and proposals across a number of areas including

Buildings & Energy; Transport; Environment; Flood Resilience; Circular Economy and Resource Management; and Community Engagement. The proposed development adopts these thematic measures and considers them across the design team adopting a Circular Economy, promoting active travel, promoting nature based SUDs solutions, promoting green and blue infrastructure and maintaining biodiversity on site.

Evaluation of Consistency

The proposed development addresses the issues of sustainability in a number of ways. The higher density achieved in this site located in the environs of Limerick City will contribute to the continued compact development of Limerick's existing urban areas. Several other documents enclosed with the planning application also outline sustainable design considerations. An Energy Statement outlines the proposed energy conservation strategy for the residential properties at the proposed new development. The energy statement focuses on energy conservation and energy efficiency, in order to maximise the overall energy performance of the proposed development. Passive and active design measures are proposed including high insulation and air tightness standards for the building envelope, and energy-efficient mechanical, electrical and plumbing systems.

7.0 SECTION 28 MINISTERIAL GUIDELINES

The key Section 28 guidelines as they relate to the proposed development are set out in the following sections. The key policy and guidance documents of relevance to the proposed development are as follows:

- Urban Development and Building Height Guidelines (December 2018);
- Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities 2024;
- Design Manual for Urban Roads and Streets;
- The Planning System and Flood Risk Management (2009); and
- Guidelines on Residential Developments for 3rd Level Students (2005); and

7.1 Urban Development and Building Height Guidelines

The Urban Development and Building Height Guidelines 2018 will further develop on government policy as set out in the NPF for achieving more compact urban forms. Paragraph 1.9 of the Height Guidelines state: "*Reflecting the National Planning Framework strategic outcomes in relation to compact urban growth, the Government considers that there is significant scope to accommodate anticipated population growth and development needs, whether for housing, employment or other purposes, by building up and consolidating the development of our existing urban areas".*

The Guidelines place emphasis on making best use of serviced sites in urban areas and state at Section 1.21: *"Increasing prevailing building heights therefore has a critical role to play in addressing the delivery of more compact growth in our urban areas, particularly our cities and large towns through enhancing both the scale and density of development and our planning process must actively address how this objective will be secured.".*

The Guidelines go on then to address Development Management in Section 3.5.5. In paragraph 3.1 the Guidelines states the following in respect of development management principles: *"In relation to the*

assessment of individual planning applications and appeals, it is Government policy that building heights must be generally increased in appropriate urban locations. There is therefore a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility…..".

The Guidelines states that 'Planning Authorities must apply the following broad principles in considering development proposals for buildings taller than prevailing building heights in urban areas in pursuit of these guidelines', each of which are outlined below and a response to each provided.

Does the proposal positively assist in securing National Planning Framework objectives of focusing development in key urban centres and in particular, fulfilling targets related tombrownfield, infill development and in particular, effectively supporting the National Strategic Objective to deliver compact growth in our urban centres?

The proposed scheme involves the development of an underutilised site, in an accessible, urban location. The subject development will contribute towards delivering compact growth in Limerick City.

Objective 13 of the National Planning Framework also states that:"In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria enabling alterative solutions that seek to achieve well-designed high quality and safe outcomes in order to achieve targeted growth and that protect the environment". In compliance with Objective 13 of the NPF, the proposed development will provide for increased heights and densities in a high-quality urban design to achieve targeted growth of the area.

The NPF also states that "to avoid urban sprawl and the pressure that it puts on both the environment and infrastructure demands, increased residential densities are required in our urban areas". Objective 35 states that it is an objective to; "Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights".

The NPF states that the demand for student accommodation exacerbates the demand pressures on the available supply of rental accommodation in urban areas. In the years ahead, student accommodation pressures are anticipated to increase. The location of purpose built student accommodation needs to be proximate to the centres of education, as well as being connected to accessible infrastructure such as walking, cycling and public transport. The proposed development for a purpose-built student accommodation scheme at this location represents an opportunity to provide for increased densities and increased heights in accordance with the NPF policies and objectives. The NPF provides for a strong emphasis towards increased building heights in appropriate locations within existing urban centres and along public transport corridors. The proposed development at 5 – 8 no. storeys is therefore considered appropriate in this location and I accordance with the NPF.

The scheme is therefore fully in accordance with the preferred approach of the National Planning Framework.

Is the proposal in line with the requirements of the development plan in force and which plan has taken clear account of the requirements set out in Chapter 2 of these Guidelines?

Compliance of the proposed development with the building height provisions of the Development Plan is addressed in Section 8.4 of this Planning Report which demonstrates compliance with the performance-based criteria for increased building heights of the Development Plan, and which was

prepared by the Planning Authority in response to the Building Height Guidelines. The criteria are to ensure that a form and intensity of urban development is achieved that contributes to the overarching objectives of the Development Plan to create sustainable communities and high quality places for people to live and work.

Where the relevant development plan or local area plan pre-dates these guidelines, can it be demonstrated that implementation of the pre-existing policies and objectives of the relevant plan or planning scheme does not align with and support the objectives and policies of the National Planning Framework?

This does not apply, as the Development Plan has been prepared in accordance with the guidance set down in the Urban Development and Building - Heights Guidelines for Planning Authorities (December 2018).

Evaluation of Consistency

The Guidelines require planning authorities to apply a number of broad principles in considering development proposals for buildings taller than prevailing building heights in urban areas in pursuit of these guidelines. An evaluation of the development proposal is undertaken in respect of these criteria as detailed in Table 4.0. The Building Height Strategy for Limerick confirms that applying these principles at the Character Area level delivers building height guidance that is unique to Limerick and that is also in accordance with National Guidance.

Table 4.0 Specific Planning Policy Requirements Urban Development & Building Height Guidelines 2018		
Criteria	Requirement	Response
At the scale of the relevant city/town		
The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.		As already detailed in Section 2.1 of this report, the site is located within 200m of a bus-stop which provides a 15 minute frequent bus service to Limerick City Centre and Raheen and is located on an identified proposed 10 minute frequency Bus Connect route. The capacity of public transport has been assessed in the enclosed Mobility Management Plan along with the overall strategy to reduce car dependency. An independent bus capacity and occupancy survey was undertaken by Traffinomics. This demonstrates there is existing capacity within nearby public transport facilities. The site is located within 1km of the University of Limerick thereby facilitating the walking and cycling of students.
Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.		The wider area comprises a broad mix of uses including residential, commercial, healthcare, retail and tourism uses. FHP Architects has prepared a design statement setting out the architectural response to the site and how the proposed design is a suitable response to the design context. The layout, orientation and height of the block has been varied in order to respond appropriately to the site while also ensuring a high standard of amenity for students and residents.

	There are no houses immediately adjoining the site and the Groody Green Wedge maintains a substantial buffer along the Groody River to the west. The Groody Road, Dublin Road and Groody Roundabout are broad and busy thoroughfares with wide dimensions, grass verges, footpaths and landscaped areas presenting an opportunity for increased height and, also providing an opportunity for increased density. Key public realm and landscape interventions are proposed in order to enhance the development and facilitate integration into the surrounding environment. The proposed development provides for the creation of an attractive, high quality, sustainable development within the existing built-up urban area. The proposal will result in the creation of a strong urban edge at a prominent gateway location into the city, with the site appropriately identified to accommodate a landmark building in the Development Plan. At 5 - 8 storeys, the proposed development is notably higher than its immediate traditional suburban context. However, buildings of a similar and greater height are already located in the wider context to the west. It is thus considered that the height of the proposed development will not be incongruous in the area. Furthermore, the nature, use and scale of the proposed development is considered to be in accordance with national and local policy and good practice guidance. It is therefore considered that the development is consistent with existing and emerging trends for development of existing underutilised, suitably well-located serviced lands. A Landscape & Visual Impact Assessment has been prepared in respect of the development by KFLA. Post construction, the proposed development will increasingly be viewed as part of the baseline environment with a corresponding acceptance of its presence and with an associated reduction of any adverse visual impact.
On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.	The proposed development varies in scale and form with building heights of between 5 – 8 storeys and the tallest building addressing the roundabout. The layout and configuration of the buildings provide variety in scale and form. A masterplan concept details how the adjoining commercial site to the north west of the site can be redeveloped in the future and assimilated into the development proposal. The proposed development seeks to provide a significant public park, comprising 1.2 hectares along the Groody River, with walkways and cycle routes connecting through to the public road (Groody Road).
At the scale of district/ neighbourhood/ street	
The proposal responds to its overall natural and built environment and makes a positive	The site is not subject to any current beneficial use, save for functioning for informal, passive amenity

contribution to the urban neighbourhood and streetscape	purposes. The site is zoned for residential use. Residential use is permitted in principle and is generally acceptable, subject to compliance with those objectives as set out in other chapters of the Development Plan. The site is identified in the Development Plan as being suitable to accommodate a landmark building and which may be suitable to provide student accommodation. The proposed development will deliver an appropriately scaled level of residential development for the student population proximate to the University of Limerick, addressing some of the identified student housing shortage, as detailed in the Student Demand Needs Assessment prepared in support of the development proposal. The Groody Road, Dublin Road and Groody Roundabout are broad and busy thoroughfares with wide dimensions, grass verges, footpaths and landscaped areas presenting an opportunity for increased height and, also providing an opportunity for increased density. Proposed student services strategically located at ground floor level, fronting the Groody Road and Groody Roundabout, seek to enliven the development and provide for vibrant and active uses at street level.
The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.	The proposed development provides for variety and interest in the block of development by providing a graduation in height and features to enhance the architectural quality of the building. The proposal provides a strong urban edge and response to the interface with Groody Road and the Groody Green Valley Wedge. The materials and finishes of the proposed blocks will be designed to a high architectural standard with varied building materials used to effectively break up the massing and scale of the blocks of development.
The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of “The Planning System and Flood Risk Management – Guidelines for Planning Authorities” (2009)	The scheme is open and permeable, allowing for ease of pedestrian and cyclist movement through the site to the Groody Green Wedge This scheme is designed to improve access and permeability for pedestrians in order to provide a higher priority to the pedestrian. The block is situated on site away from the edge of the Groody Road, thereby facilitating a future Bus Connects route to the east of the site. The Groody Green Wedge, comprising 1.2 hectares, provides for a substantial area of public parkland which can absorb an increase in building height. The SSFRA was prepared by Garland Engineers in accordance with the recommendations of “The Planning System & Flood Risk Management - Guidelines for Planning Authorities”. The report concludes that the proposed blocks of development are located on land identified as being within Flood Zone C for fluvial and pluvial flooding and in accordance with The Planning System & Flood Risk Management Guidelines the proposed residential

	development is deemed appropriate for this flood zone designation.
The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.	At 5 - 8 storeys, the proposed development is notably higher than its immediate traditional suburban context. However, buildings of a similar and greater height are already located in the wider context and as such, it is considered that the height of the proposed development will contribute to the legibility of the wider area, particularly given its position at a significant nodal point at a roundabout junction linking the Dublin Road and the Groody Road.
The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.	The proposal supports the '10-minute' neighbourhood concept as the location allows students to walk or cycle to the University of Limerick. In addition, there is significant retail provision and other services located within an easy walk of the site to the west, at the Parkway, which can support and benefit the development proposal. Whilst there are other student residential schemes in the area, the Student Accommodation Demand & Concentration Report confirms that only 5.9% of the population within 1km of the site are students over the age of 15 years. The development proposal will increase this percentage to 16.9% which is deemed acceptable[4] in principle.
At the scale of the site/building	
The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.	Good levels of daylight are achieved in the proposed development as set out in the 3D Design Bureau Daylight & Sunlight Assessment Report and as detailed in Section 5.9 of this report.
Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting'.	3D Design Bureau has completed a report assessing the daylight/sunlight levels received by neighbouring properties, the proposed student residential units and the external amenity areas. As noted in the Daylight & Sunlight Analysis report an iterative design approach has been adopted to maximise the schemes performance. The results are summarised in Section 5.9 of this report.
Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration	Some 92% of the units achieve appropriate SDA levels and 81% of the units achieve appropriate SE levels. Compensatory measures are detailed in Section 5.9 of this report details compensatory design solutions including larger bedrooms, high floor to ceiling heights, large communal areas and significant amenity areas at ground floor level, including a significant public park.

[4] *Edinburgh City Council's Student Housing Guidance*

and or an effective urban design and streetscape solution.	

7.2 Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities 2024

The Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities replace the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities 2009. The Guidelines build on and update previous guidance to take account of current Government policy and economic, social and environmental considerations. The Guidelines expand on higher-level policies of the National Planning Framework, setting policy and guidance in relation to the growth priorities for settlements, residential density, urban design and placemaking and introduce development standards for housing.

To achieve compact growth, the Guidelines support medium-density housing models, alongside traditional housing and apartment developments, recognising the significant population growth forecast and changing demographics. The guidelines also recommend specific standards for housing, such as minimum separation distance, private and public open space provisions, and car parking. Whilst these design standards are not applicable to student housing schemes, particularly with respect to open space provision and car parking standards, the separation distances do provide some level of general guidance.

Table 3.1 of the Guidelines categorises the area and density ranges for Limerick and determines the location of the site within the City - Urban Neighbourhood category, as it includes the compact medium density residential neighbourhoods around the city centre that have evolved over time to include a greater range of land uses. The site is a highly accessible urban locations with good access to education and institutional uses and public transport. It is a policy and objective of the Guidelines that residential densities in the range 50 dph to 200 dph (net) shall generally be applied in such urban neighbourhoods. The proposed development located within 200m of a bus-stop which provides a 15 minute frequent bus service to Limerick City Centre and Raheen and is located on an identified proposed 10 minute frequency Bus Connect route. The proposed development of 186 uph falls within the density category recommended in the Guidelines.

The Guidelines contain a number of Specific Planning Policy Requirements (SPPR's) which seek to reduce traditional development management standards relating to a minimum quantum of private and public open space, rear garden sizes and car parking. This is done in an effort to afford greater flexibility to development proposals and to facilitate increased densities and compact growth.

Evaluation of Consistency

The development proposal is in compliance with the recently published Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities 2024 as detailed in Table 5.0.

Table 5.0 Specific Planning Policy Requirements Compact Settlement Guidelines 2024		
Policy & Objective No.	Summary	Development Compliance
3.1	The recommended residential density ranges set out in Section 3.3 are applied within statutory development plans and in the consideration of individual planning applications, and that these density ranges are refined further at a local level.	The Guidelines specify that residential densities in the range 50dph to 200dph (net) shall generally be applied at City-Urban Neighbourhood Locations in cities such as Limerick. The proposed net density of 186 dwellings per hectare falls within the range of density provisions promoted in the Guidelines.
4.1	The principles, approaches and standards set out in the Design Manual for Urban Roads and Streets, 2013 shall be implemented.	The principles of the Design Manual have been incorporated into the proposed development. Compliance with the requirements of DMURS has been demonstrated in the Quality Audit prepared by P.M.C.E and the DMURS Statement prepared by Garland Engineers.
5.1	The requirement in the development plan shall be for public open space provision of not less than a minimum of 10% of net site area and not more than a minimum of 15% of net site area save in exceptional circumstances.	Not applicable
4.2	The key indicators of quality urban design and placemaking set out in Section 4.4 are to be applied within statutory development plans and in the consideration of individual planning applications.	The Key Indicators of quality and design as detailed in Appendix D of the Guidelines has been considered and are detailed in the Architectural Design Report prepared by FHP Architects.
SPPR 1	A separation distance of at least 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained.	A 16m separation distance has generally been maintained between opposing windows above ground floor level. Where blocks are positioned less than 16m, the blocks of development are angled such that direct overlooking does not occur between opposing windows.
SPPR 2	Minimum private open space standards for houses: 1 bed house 20sqm 2 bed house 30sqm 3 bed house 40sqm 4 bed+ house 50sqm	Not applicable.
SPPR 3	Car parking should be minimised and substantially reduced and applicants should provide a rationale and justification for the number of car parking spaces proposed.	Section 4.3 justifies the provision of a minimal 40 no. car parking spaces on site.

SPPR 4	Cycle Parking and Storage to be provided. Minimum cycle parking of 1 space per bedroom to be applied with additional space for visitor parking.	Secure and covered bicycle parking is accommodated at ground floor level in all blocks as detailed in Section 4.3 of this report. A total of 306 no. bicycle spaces have been provided to serve the student accommodation in accordance with the provisions in the Development Plan.

7.3 Design Manual for Urban Roads and Streets

The *'Design Manual for Urban Streets and Road' (DMURS)* sets out statutory guidance and standards in relation to the design of individual streets. The application of DMURS is necessary to ensure that strategic movements are catered for along desire lines and that all street networks offer route choice and maximise the number of safe and attractive walking and cycle routes between key destinations. The application of DMURS is key to ensure sustainable mobility and the creation of high quality and attractive settlements.

Policy and Objective 4.1 of the recently published Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities 2024 states that *"it is policy and objective of these Guidelines that planning authorities implement the principles, approaches and standards set out in the Design Manual for Urban Roads and Streets, 2013 (including updates) in carrying out their functions under the Planning and Development Act 2000 (as amended) and as part of an integrated approach to quality urban design and placemaking".* These Guidelines, therefore, must be promoted within the proposed development.

Section 1.2 of DMURS requires that street layouts be interconnected to encourage walking and cycling and offer easy access to public transport. Section 3.2 identifies types of streets, including arterial streets, link streets and local streets. Section 4.0 details the maximum radius to be used on various type of roads and streets and details the appropriate widths.

Evaluation of Consistency

Compliance with the requirements of DMURS can be found in the Quality Audit Report prepared by P.M.C.E and the DMURS Statement prepared by Garland Engineers.

7.4 Guidelines for Planning Authorities on 'The Planning System and Flood Risk Management

The Planning System and Flood Risk Management Guidelines require the planning system at all levels to avoid development in areas at risk of flooding, particularly floodplains, unless there are proven wider sustainability grounds that justify appropriate development and where the flood risk can be reduced or managed to an acceptable level without increasing flood risk elsewhere; adopt a sequential approach to flood risk management when assessing the location for new development based on avoidance, reduction and mitigation of flood risk; and incorporate flood risk assessment into the process of making decisions on planning applications and planning appeals.

Evaluation of Consistency

In order to comply with these Guidelines a Site-Specific Flood Risk Assessment (SSFRA) has been prepared by Garland Engineers and accompanies the application. The SSFRA was prepared to comply with current planning legislation, in particular the recommendations of "The Planning System & Flood

Risk Management - Guidelines for Planning Authorities". The report concludes that all development within the site is being undertaken within Flood Zone C and the Flood Zone A & B areas are being maintained.

7.5 Guidelines on Residential Developments for 3rd Level Students (2005)

The Guidelines are intended to assist developers and designers in formulating proposals for student residential development. They have been prepared with a view to ensuring that the overall standard of design and construction of accommodation being provided would promote the objectives of the Student Residential Accommodation tax incentives.

The Guidelines specify minimum bedroom size and communal area size and stipulate that ancillary amenity / recreational space should not comprise more than 12 per cent of the overall floor area.

Evaluation of Consistency

The proposed development has been designed to exceed the standards in these Guidelines, with bedroom and communal floor areas in excess of the minimum sizes specified in the Guidelines. Further, the quantum of ancillary communal and amenity space at 5.1 percent is substantially below the 12 per cent maximum provision.

8.0 REGIONAL POLICY

8.1 Regional Spatial and Economic Strategy for the Southern Region (2019-2031)

The Regional Spatial and Economic Strategy for the Southern Region (RSES) sets out a twelve year strategic development framework for development and transcribes the NPF objectives to the regional level.

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. The MASP for Limerick – Shannon highlights the need to increase residential density 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";*
- 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".*

Evaluation of Consistency

A Metropolitan Area Strategic Plan (MASP) has been prepared for Limerick city and the Metropolitan Area, the policies and objectives which have been transcribed via the Limerick Development Plan 2022 – 2028. The subject site is on serviced lands in an existing built up area situated in proximity to Limerick City but considered to represent a city-urban neighbourhood location given the commercial / residential nature of the area and the level of existing and proposed public transport connectivity. The proposed development which will deliver 1,400 no. new bedspaces will therefore contribute to the sustainable development of Limerick City and suburbs in line with the objectives of the RSES and the Limerick-Shannon MASP.

9.0 LOCAL POLICY

The Limerick Development Plan 2022-2028 (also referred to as the 'Development Plan') sets out Limerick City & County Council's policies for the development of Limerick City to 2028 and beyond. As set out in the Development Plan, the vision for Limerick City is to continue to grow as the centre of economic, social and cultural development for the Mid-West Region.

The following sections of this report evaluate the development proposal against a number of different themes set out in the Development Plan.

9.1 Zoning

The subject site is zoned for 'New Residential purposes (2.1 hecatres) and as the 'Groody Valley Green Wedge' (1.2 hectares) in the Development Plan. The objective of the new residential zoning is "*to provide for new residential development in tandem with the provision of social and physical infrastructure". Its purpose is "*is intended primarily for new high quality housing development, including the provision of high-quality, professionally managed and purpose built third level student accommodation".

The objective of the 'Groody Valley Green Wedge' is "*to preserve and protect the Groody Valley from development". Its purpose is "to* maintain the area's importance in preventing the encroachment of the built up area of Limerick City and to retain its important role as a wildlife corridor and a flood management zone".

The proposed development seeks to construct 5 no. block of student residential units on that land zoned for residential purposes. The Groody Valley Green Wedge is maintained as a local public park, accommodating walkways and a constructed wetland area. The proposed development is wholly compliant with the zoning provisions afforded to the land.

9.2 Site Specific Objectives

Objective GV O1 in the Development Plan, details a number of site specific objectives which must be complied with. Table 6.0 illustrates compliance with the objectives.

Table 6.0 Site Specific Planning Objectives		
Objective No.	Objective Detail	Development Compliance
GV01a	Require a high-quality landmark design. The proposal shall include an integrated development incorporating the fuel depot site along the R445 Dublin Road.	A Masterplan has been provided demonstrating how the fuel depot can be developed in the future, should the land become available for development purposes. The Masterplan indicates a potential future block with access off the internal road serving the development. This development could be facilitated as a future Phase 3, subject to planning consent. The proposed development incorporates a high quality landmark design of 5 – 8 stories in height. The proposed 8 storey block is positioned at the northern corner of the site, fronting the Groody roundabout, providing an appropriate landmark on the Dublin Road.
GV02b	Facilitate purpose-built student accommodation where deemed appropriate.	The application site, located within 1km of the University of Limerick proposes 1,400 student bedspaces with ancillary supporting facilities.
GV03c	Require car parking to be located to the rear of any building, or adequately screened and sympathetically integrated within the site.	A nominal parking provision of 40 no. car parking spaces is proposed on site and is anticipated that a low number of trips will be generated by the proposed use on a daily basis. Car parking has been accommodated to the side of the blocks of development, removed from direct public view, with car parking on the eastern boundary adjoining the Groody Road situated to the rear of a 2.5m high acoustic berm.
GV04d	Require connectivity for pedestrians and cyclists to the Groody Valley zoned lands.	The proposed development facilitates public access and connectivity through to the Groody Valley Green Wedge and provides linkages with intended proposals in the Blue Green Ring Masterplan for the area.
GV05e	Ensure the design facilitates access to enable complementary development on the Groody Valley zoned lands.	The proposed development facilitates complementary development on the Groody Valley lands in the form of a substantial public parkland

9.3 Core Strategy

Chapter 2 of the Development Plan sets out its Core Strategy and addresses the issues of housing, employment and infrastructure. In relation to housing, the Core Strategy makes reference to role that the County's 'Undeveloped Zoned Housing Land' will play in the delivery of the required quantum of housing (Policy CS P3). Policy CS P1 states it is a policy of the Council to implement the Core Strategy for Limerick to ensure consistency with policies at a national and regional level, in particular population targets and distribution. In this regard, the Strategy identifies this area of the city as an Intermediate Urban Location / Transport Corridor.

Table 2.6 in the Development specifies that a minimum net density of 45+ dwelling units per hectare are required (Underline Our Emphasis), at appropriate locations within:

a. 800 metres of (i) the University Hospital; (ii) Raheen Business Park; (iii) National Technology Park; (iv) University of Limerick; (v) Technological University of the Shannon; (vi) Mary Immaculate College;
b. 500m of high frequency (min. 10-minute peak hour frequency) existing or proposed urban bus services and;
c. 400m of reasonably frequent (min. 15-minute peak hour frequency) urban bus services

The proposed development is located within 1,000m of the University of Limerick and is located within 200m of a bus-stop which currently provides a 15 minute frequent bus service to Limerick City Centre and Raheen. The Dublin Road adjoining the site is located on a proposed 10 minute frequency Bus Connect route and this determines compliance with category (b) above. The proposed development of 186 uph exceeds the minimum net density standard set out in the Development Plan and therefore must be deemed compliant with the provisions of the plan. In this regard it is noted that there are no maximum density standards promoted in the Development Plan.

Instead, Policy CS P2 states it is a policy of the Council to support the compact growth of Limerick City Metropolitan Area, towns and villages by prioritising housing and employment development in locations within and contiguous to existing City and town footprints where it can be served by public transport and walking and cycling networks, to ensure that development proceeds sustainably and at an appropriate scale, density and sequence, in line with the Core Strategy Table 2.7. The subject site is zoned, serviced and is proximate to services and facilities, all in accordance with provisions set out in the core strategy of the Plan.

9.4 Building Height

In accordance with the requirements of the Urban Development and Building Height Guidelines for Planning Authorities (2018), a Building Height Strategy for Limerick City has been incorporated into the Development Plan. The strategy acknowledges that the Castletroy / University Gateway Area area is predominantly low rise, 1-3 storeys, and substantially residential in character. It further acknowledges that the higher end of the height range is generally located in the newer residential areas including inter alia Bloomfield as well as in purpose built student accommodation such as Brookfield Hall which is up to 4 storeys.

The Development Plan promotes a landmark building on the site, in accordance with its Gateway Status identified in the Building Height Strategy. A landmark building is defined by the surrounding context height, so what constitutes a landmark building will vary across the City. The Building Height Strategy states that while a landmark building stands out in terms of its visual impact, its impact on the overall

skyline of the City is local. In this context the existing tall Travelodge Building (8 stories) to the west of the site is considered a significant reference point. The Building Height Strategy does state that "*New tall buildings in areas already containing taller buildings should generally reflect that existing scale".*

It is noted that in contrast to the text in the Development Plan, the Building Height Strategy included as an Appendix in the Plan, identifies the area as being suitable for a Gateway Building. A Gateway Building is different to a landmark building in that the significance of a gateway building extends beyond the local. Such buildings are often located at gateways e.g. at a major transport junction or at an entrance to the City Centre, identifying visually the importance of the location in the wider context.

At 5 - 8 storeys, the proposed development is notably higher than its immediate traditional suburban context. However, buildings of a similar and greater height are already located in the wider context to the west. It is thus considered that the height of the proposed development will not be incongruous in the area. Objective CGR 09 in the Development Plan provides for a number of criteria which must be complied with as detailed in Table 7.0

Table 7.0 Building Height Compliance

Objective No.	Objective Detail	Development Compliance
CGR09a	Ensure that all new tall buildings in Limerick City are designed in accordance with the character area objectives, tall building recommendations and criteria set out in the Development Management Standards. All such buildings shall be of an exceptional architectural quality and standard of design and finish.	The proposed development has been designed to a high quality architectural standard including use of materials, public realm treatment and landscaping. The character area objectives for UCA 03 encompassing the subject site include; development of an isolated residential site, retention of the Groody Green Wedge, and development of a cluster of buildings in support of rather in direct competition with the University of Limerick. The small site area, comprising 1.88 hectares of net developable area, means that the site will and can never compete with the status of the University.
CGR09b	Focus delivery of tall buildings in the City Centre, in particular the areas that have been identified as having potential for increased building height. In particular, tall building clusters will be encouraged at The Quays, Colbert Station Quarter, Cleeves Site and The Docklands in accordance with the building classification criteria set out in the Building Height Strategy. There shall be a general presumption against tall buildings in other areas, except at designated areas and the gateway locations identified in the Tall Buildings at City Level Map.	The subject site is identified on the Tall Buildings at City Level Map. The site has been identified as a Gateway location, capable of accommodating a tall building. The Groody Roundabout signalises entry into a developing urban district with the future redevelopment of the Horizon site and a permitted student housing scheme at Rhebogue. The subject site acts as a gateway marking the connection between the existing City, Castletroy and the Parkway Urban District.

CGR09c	Protect the unique intrinsic character, scale and significant views of Limerick City, the skyline and key landmark buildings in the delivery of increased building heights, through the application of the Tall Building Classifications, Recommendations, High Level Principles and Assessment Tools and Criteria set out in the Building Height Strategy.	The proposed development has been assessed against the criteria set out in Section 2 of the Urban Development and Building Height Guidelines and the 11 criteria as set out in the Building Height Strategy for Limerick as detailed in Table 4.0 of this report. The assessment in Table 4.0 also incorporates consideration of the criteria set out in Policy TB7: Assessment Criteria for Tall Building in the Building Height Strategy. The proposed development benefits from an Approach Road prospect which gives the visitor travelling along the Dublin Road from the Castletroy direction, the vital 'first impressions' of Limerick City and the further distant view of the 8 storey Travel Lodge Hotel at Rhebogue. The development is advanced whilst maintaining an instant appreciation of the topography and character of the City.
CGR09d	Ensure applications for tall buildings are supported by the following assessments and any additional assessments required at the discretion of the Planning Authority - Environmental Assessment, Wind Analysis, Sunlight and Daylight Analysis, Verified View Analysis, Landscape and Visual Impact Assessment, Architectural Design Statement, Traffic Impact Assessment including a Mobility Management Plan for non- residential uses, Building Services Strategy.	The planning application is accompanied by a number of Environmental Reports, including Wind Analysis, Sunlight and Daylight Analysis, Verified View Analysis, Landscape and Visual Impact Assessment, Architectural Design Statement, Traffic Impact Assessment including a Mobility Management and an Acoustic Assessment. A plan for non- residential uses is also proposed along with an Operational Management Plan.

9.5 Settlement Strategy

Limerick City and County Council acknowledges the social and economic benefits of more compact settlements and is committed to delivering compact growth, through active land management and initiatives to revitalise urban settlements. Policy CGR P1 seeks to *achieve sustainable intensification and consolidation, in accordance with the Core Strategy, through an emphasis on revitalisation and the delivery of more compact and consolidated growth, integrating land use and transport, with the use of higher densities and mixed use developments at an appropriate scale on brownfield, infill, backland, and underutilised sites within the existing built footprint of Limerick's City, Towns and Villages*. Objective CGR 03 further promotes urban lands and compact growth encouraging and facilitating sustainable revitalisation and intensification.

The proposed development delivers more compact and consolidated growth in accordance with Policy CGR P1 but in contrast to the traditional suburban dominance of urban housing in the area. Through the adoption of higher densities within the existing built footprint of the city, a significant development is

being advanced providing for much needed student accommodation in the city in proximity to the University of Limerick.

Policy CGR P3 seeks *to strengthen and consolidate Limerick City and Suburbs (in Limerick), Mungret and Annacotty as a key driver of social and economic growth in Limerick and become a vibrant living, retailing and working City. In accordance with national and regional policy it is a requirement that at least 50% of all new homes will be located within the existing built-up footprint of the settlement, in order to deliver compact growth and reduce unsustainable urban sprawl.* The development proposal accords with this strategic policy promoting development within the built up area on serviced land.

9.6 Housing & Student Accommodation

Section 4.2.10 of the Development Plan recognises that students are an increasingly important part of the housing demand in Limerick, particularly in Limerick City, Suburbs and Annacotty. The Development Plan also recognises that the third level institutions in the city are seeking to increase student numbers, within the lifetime of the Plan, which accordingly will result in increased demand for high quality student accommodation.

Objective HO O8 supports the provision of high quality, professionally managed purpose built student accommodation provided such accommodation satisfies a number of criteria, as detailed in Table 8.0.

Table 8.0 Student Accommodation Objectives

Objective No.	Objective Detail	Development Compliance
HO O8a	Support the provision of high quality, professionally managed purpose built student accommodation either on campus, or in appropriate and accessible locations on public transport or cycle networks. All forms of student accommodation shall respect and protect the existing residential amenities of the area in which it is proposed. Student accommodation shall be of appropriate design, in accordance with the Department of Education and Science Guidelines on Residential Development for Third Level Students (1999), and (2005) and any subsequent updates. Applications for change of use from student housing to any other form of use shall be strongly resisted, without adequate demonstration that there is no longer a need for such use in the area and an over-provision of student housing exists.	The proposed development is located within 1km of the University of Limerick, in an area serviced by dedicated cycle paths, footpaths and public transport. The site is located within 200m of a bus stop on an existing bus rote with a 15 minute frequency to the city centre and which will be improved to a 10 minute frequency under Bus Connects. Although of greater density and height relative to surrounding residential development, the proposed blocks are suitably located adjoining the Dublin Road and Groody Roads to the north and east and the Groody Valley Green Wedges to the west and south. The site characteristics surrounded by adjoining road and open space buffer areas, lends itself to higher and dense development removed from immediately adjoining residential development. The student accommodation has been designed in excess of the minimum requirements set out in the Department of Education and Science Guidelines on Residential Development for Third Level Students (1999),

HO O8b	Ensure that all applications for new off campus purpose built student accommodation, the change of use to student accommodation in existing residential areas, or extensions to existing dwellings to facilitate student accommodation, must include details outlining the presence and distribution of any permanent residential occupiers; the extent of students renting in the private housing market; and the presence of any other housing catering primarily for students and short term lets in the area/estate. The application should address any potential impacts of the proposal on residential amenity and any permanent residents in the area.	A Student Demand Assessment Report has been prepared by HRA Planning addressing the requirements in the Development Plan and detailing the extent and need of student accommodation in the area. The report highlights that there has been limited development of purpose-built student accommodation in Limerick City since the National Student Accommodation Strategy was published in 2017. In the time since the strategy was published, only 608 no. bed spaces have been constructed or granted planning permission. This has resulted in a shortfall of 2,374 bed spaces based on the 2024 demand projections for Limerick City, detailed in the Strategy. These figures highlight that there is a need to deliver more purpose built student accommodation in the city.
HO O8c	Require all applications for off-campus purpose-built student accommodation to be accompanied by a Student Management Plan outlining how the scheme will be professionally managed. The Plan shall demonstrate how the development will be managed so as to avoid potential negative impacts from occupants on surrounding properties and neighbourhoods and ensure the maintenance of safe, secure and clean environments for the community, occupants and nearby residents.	An Operational Student Accommodation Management Plan has been prepared. The Plan commits to the appointment of a specialist Student Management Provider and a professional Management Service in the delivery and operation of the development proposal.
HO O8d	Ensure permissions for student accommodation will be subject to a condition requiring planning permission for a change of use to any other type of use, including short-term holiday letting. Future applications for this type of change of use will be resisted. Where it is demonstrated that such student accommodation is no longer required, a planning application will require details of a proper management plan for the non-student use of the units to prevent adverse impacts on traditional residential estates.	The planning authority should note that this application includes permission for use of the accommodation, outside of student term time, for short-term letting purposes, as already justified in Section 4.4 of this report.

Objective HO 02 promotes increased density in accordance with Table 2.6 Density Assumptions per Settlement Hierarchy in the Development Plan which have already been considered in this report.

Objective HO O3 recognises the need to ensure a balance between the protection of existing residential amenities, the established character of the area and the need to provide for sustainable new development. Whilst the subject site is removed from immediate neighbouring houses, the closest houses to the development are located across the Groody Road in Curragh Birin. The proposed development has considered impacts on the residential amenities of these houses by reason of daylight and sunlight impacts as already discussed in Section 5.9 of this report. Whilst the proposed development will result in a minor adverse impact on five ground floor windows of the properties along 6 -9 Currgah Birin. 3D Design Bureau considers that these minor impacts should be deemed acceptable, having regard to the objectives of the site to accommodate a landmark building.

9.7 Environment Heritage Landscape & Green Infrastructure

Policy EH P1 and EH 01 seek to protect and conserve Limerick's natural heritage and biodiversity, in particular, areas designated as part of the European Sites Natura 2000 network. A Natura Impact Statement prepared by Russell Environmental and Sustainability Services Ltd. Confirms the proposed development site is located outside the boundary of European Sites. No pathways for direct impacts as a result of the development on any of the QIs/SCIs of any European Site were identified. Emissions to surface water were identified as a pathway for potential indirect effect, but with mitigation measures the potential for any significant impacts are avoided.

Objective EH O3 requires all developments where there are species of conservation concern, to submit an ecological assessment of the effects of the development on the site and nearby designated sites. An Ecological Impact Assessment has been prepared as already detailed in Section 5.4 of this report.

Objective EH O4 seeks the creation of new habitats by encouraging wild green areas and new water features such as, pools and ponds in new developments. A comprehensive landscaping scheme has been delivered including proposals for a substantial new public park in the Groody Valley Green Wedge, as detailed in Section 5.8 of this report. The proposal includes a constructed wetland area in close proximity to the Groody River, incorporates wildlife considerations in the retention/ protection/ management and reinforcement of natural features on site and maintenance of the Groody Green Wedge.

Objective EH O14 seeks to increase the use of Nature Based Solutions (NBS) throughout Limerick. This objective is delivered throughout the development of Nature Based SuDs measures proposed and integrated throughout the development.

Objective EH O21 in relation to noise and vibration during construction and at Open Sites seeks to protect the quality of the environment. An Acoustic Assessment was undertaken in respect of the development proposal which details a number of mitigation measures during construction. The CEMP accompanying the development, incorporates these measures to ensure appropriate noise levels are maintained during construction.

It is noted that a Limerick Blue Green Ring Masterplan is being prepared and was placed on public consultation during December 2024. In that Masterplan, the Groody Valley is considered for development as a District Park serving the Castletroy community and attracting visitor from other areas. The objective is to develop it as a natural and semi-natural park offering a range of attractions and facilities, whilst also addressing the gap in recreational space in the immediate area. The Groody Valley

provides a range of opportunities for biodiversity, recreation, wildlife and education and focuses on five criteria as follows:

- Promote nature conservation – The proposed development works with the natural contours and features within the Groody Valley Green Wedge, providing a wetland area, walkways and enhanced planting.
- Deliver recreational opportunities – the development opens up access to the Groody Valley, providing cycling and walking paths and offering substantial areas of green space for informal recreation
- Enhance the educational offer of the site – the constructed wetland area could be used for educational purposes along with natural access to the Groody River
- Incorporate facilities of natural play – substantial areas of grassed area are provided to facilitate natural play
- Delivery of active trave linkages – pedestrian and cycle paths are provided throughout the area.

9.8 Sustainable Mobility and Transport

Objective TR O2 supports the appropriate road design standards of all roads and streets within the urban areas, including suburbs, towns and villages within the 60km/h zone as per the Design Manual for Urban Roads and Streets. The scheme has been evaluated for compliance with DMURS as detailed in the Quality Audit prepared by P.M.C.E and the DMURS Statement prepared by Garland Engineers.

Objective TR O6 promotes a modal shift away from the private car towards more sustainable modes of transport including walking, cycling, carpool and public transport in conjunction with the relevant transport authorities by making walking, cycling, carpool and public transport more attractive, appealing and accessible for all. The proposed development facilitates connectivity within and outside of the development, providing connections through to the Groody Road, Dublin Road and the Groody Valley. Further, in accordance with Objective TR O7 which continues to implement behavioural change initiatives and 'softer measures' aimed at enabling and promoting sustainable travel across Limerick, the development provides for a greater number of cycle parking facilities over and above that required in the Development Plan, with limited car parking provision on site.

Parking and cycle standards have been provided in accordance with Objective TR 049 as already detailed in Section 4.3 of this report.

The proposed development meets the Development Plan Policy TR P5 which seek to implement the 10-minute city/town concept, promote compact growth and reduce the need for long distance travel. The proposed development site is located in an urban area surrounded by a road network with facilities and infrastructure for vulnerable road users and public transport users. It is also located a 2 minute walk from an existing neighbourhood centre which offers a number of local services and faciltieis.

9.9 Water Infrastructure & Climate

The Limerick City and County Council Climate Action Plan 2024 - 2029 reinforces the commitment of the local government sector to lead on climate action at local and national levels, as reflected in the local government strategy In response to Climate Action at a national level, Limerick City & County Council recently adopted its Climate Action Plan 2024 – 2029. It identifies targets and proposals across a number of areas including Buildings & Energy; Transport; Environment; Flood Resilience; Circular Economy and Resource Management; and Community Engagement. The proposed development adopts these thematic measures and considers them across the design team adopting a Circular

Economy, promoting active travel, promoting nature based SUDs solutions, promoting green and blue infrastructure and maintaining biodiversity on site.

Compliance with Objective IN O12 is considered in the Garland Civil Engineering Report accompanying the application as it deals with surface water management and SuDS throughout the site, dopting a Nature Based Solution to such provision in accordance with the provisions of the Green and Blue Infrastructure Strategy for Limerick.

In accordance with Objective CAF O6 the proposed development is designed to take account of the impacts of climate change including the installation of rainwater harvesting systems, sustainable urban drainage systems and nature-based solutions for water management.

Objective CAF 07 supporting Near Zero Energy Buildings is promoted in the standard of building houses as detailed in the Sustainable Energy Report has been prepared by JOT Energy Consultants. The report outlines how the construction and performance of the proposed development will meet or exceed legislative and planning requirements, with particular emphasis on meeting the current Nearly Zero Energy Buildings standards. It also considers renewable energy sources in accordance with Objective CAF 08.

9.10 Sustainable Communities and Social Infrastructure

Objective SCSI O1 seeks to ensure new residential developments incorporate appropriate provision for community and recreational facilities, for the benefit of local residents. In this regard, the proposed development incorporates significant ancillary services (1,566.7sqm) at ground floor level including a canteen, gym, study area, launderette and a small retail unit. Adequate communal and public open space is also provided as previously discussed, with a new public park comprising 1.2 hectares in area.

Objective SCSI O8 seeks to promote and develop place-making for the community developing and protecting an open space network and hierarchy of quality public and community spaces, to extend close to where people live. The proposed development contributes to this objective by providing for a linked network of open space areas within the development, as the Groody Park can extend southwards along the banks of the River Groody.

9.11 Development Management Standards

Whilst the previous paragraphs evaluate the proposed development against a number of policies and objectives in the Development Plan, there is also a need to consider a number of relevant development management standards provided in Chapter 11 of the Plan. The relevant standards have been extracted from the Development Plan as detailed in Table 9.0 and an evaluation of the development proposal provided.

Table 9.0 Development Management Standards Limerick Development Plan 2022 – 2028

Development Plan Standards	Development Evaluation
Section 11.1.2 - A Sustainability and Social Infrastructure Statement, which is an outline of the proposal's context and addresses how it responds to Plan objectives and surroundings, should be submitted	This Planning Compliance Statement details how the development responds to the Plan's objectives. A Social Infrastructure Audit has not been undertaken given the nature of the development proposal providing student accommodation and the temporary nature of

	that accommodation, which will be focused on the services and facilities provided in the University of Limerick Campus and the services and facilities within the development proposal itself at ground floor level. The Architectural Design Statement rationalises the sustainable design approach to development.
Section 11.2.2 – Houses should be life adaptable to accommodate changing household sizes and a detailed breakdown of the unit type and size provided.	Table 1.0 and Table 3.0 of this report provides a breakdown of the units across the five development blocks in accordance with the requirements in the development plan, whilst a breakdown on the floorspace uses at ground floor level are provided in Table 3.0.
Section 11.2.3 - Guidance for Residential density has been set out in Chapter 2: Core Strategy.	Density has already been considered in Section 8.3 of this report in full compliance with the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities 2024 and the Development Plan provisions.
Section 11.2.3 - A phasing schedule for any residential development exceeding 30 units, shall be submitted with a planning application.	A phasing schedule has been prepared which provides for the delivery of two phases of development over a seven year period.
Section 11.3.4 – Adequate refuse, storage , recycling and composting areas shall be catered for.	Within Blocks A to D a dedicated internal area for waste storage has been integrated within the ground floor of each building, as shown on the architectural plans. A separate enclosed and secure waste storage area building is provided adjacent to Block E to service it as indicated on the architectural site layout plan. The Operational Student Accommodation Management Plan clarifies how the blocks of development shall be managed.
Section 11.3.5 – Roads, footpaths, water services and landscaping requirements	Road and footpath design and construction are proposed in accordance with DMURS as detailed in the DMURS Statement prepared by Garland Engineers. A Confirmation of Feasibility has been received from Uisce Eireann. Surface water discharge is attenuated on site.
Section 11.3.6 – In accordance with the 2009 Sustainable Residential Guidelines and any subsequent guidelines, at a minimum, 15% of the gross greenfield sites should be provided as multifunctional open space in new residential developments easily accessible to all.	Although not directly relevant to the provision of student accommodation, regard has been had to the site context and the potential to enhance amenity in the area. Accordingly, a substantial public park of 1.2 hectares (54.7% of total site area)) has been provided along with three communal courtyards (16.4% of net site area).
Section 11.3.8 – Landscape design and maintenance plans are required to address a number of issues including biodiversity and nature based play, urban greening and specifications for materials	A Landscape & Biodiversity Plan has been prepared. Existing trees and hedgerows are maintained and nature based drainage solutions are proposed. Specifications for materials are detailed on the landscaping plan.

Section 11.3.11 - All new developments will be required to manage and minimise surface water runoff by the use of Sustainable Drainage Systems (SuDS),	A comprehensive Storm Water Management Plan has been provided by Garland Engineers.
Section 11.3.12 – Noise and requirement for an Acoustic Design Statement where noise is identified as an issue.	An Acoustic Assessment was undertaken by Traynor Environmental having regard to the level of traffic noise in the area. Appropriate mitigation, including acoustic berms have been incorporated into the development proposal.
Section 11.4.2 – An appropriate separation distance is advocated between residential units	Table 5.0 of this report details how the development complies with the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities 2024, with respect to separation distances of no less then 16m between residential units, insofar as they remain applicable to student accommodation.
Section 11.4.2.3 – All habitable rooms within new residential units shall have access to appropriate levels of natural/daylight and be guided by the principles of Site Layout Planning for Daylight and Sunlight, A guide to good practice (Building Research Establishment Report, 2011) and/or any updated guidance. A daylight analysis will be required where considered necessary.	Section 5.9 of this report details a daylight/sunlight assessment undertaken by 3D Design Bureau. As noted in the Daylight & Sunlight Analysis report an iterative design approach has been adopted to maximise the schemes performance. The authors of the report deem the results to be acceptable.
Section 11.4.4.7 - The Council will prioritise student accommodation on campus or within 1km distance from the boundary of a Third Level Institute, followed by locations within close proximity to high quality public transport corridors, cycle and pedestrian routes and green routes; The provision and location of student accommodation will not be permitted where it would have a detrimental effect on established residential amenities; The provision of on-site facilities, including storage facilities, waste management, quality and quantum of cycle parking and associated showers and lockers, leisure facilities, car parking and amenity areas The architectural quality of the design and integration with the wider streetscape with respect to scale, mass, external finishes and landscaping; The number of existing similar facilities in the area (applicable only to off campus accommodation). In assessing a proposal for student accommodation, the Planning Authority will consider the cumulative impact of student accommodation, which exists in the locality and	The subject site is located within 1km of the University of Limerick in compliance with Section 11.4.4.7. The development is located on an isolated site within a built up area surrounding by substantial roads and open space areas. Accordingly there is a substantial buffer area around the site which separates the development from neighboring housing. The proposed development will therefore not have a detrimental impact on established residential amenities. Furthermore when operational, this student complex will be professionally managed on a 24 hour basis. There are significant onsite facilities proposed as part of the development at ground floor level across all blocks, as detailed in Table 3.0 of this report. A landmark building is promoted on the site in the Development Plan. The proposed design reacts to this requirement proposing 5 blocks of development ranging in height from 5 – 8 storeys. The material finishes and proposed landscaping are all to a very high standard of quality. A Student Demand Assessment Report has been prepared by HRA Planning addressing the

will resist the overconcentration of such schemes in any one area, in the interests of sustainable planning	requirements in the Development Plan and detailing the extent and need of student accommodation in the area. Only 5.9% of the population (over the age of 15 years) living within 1km of the site are students. This is notwithstanding that the immediate area, outside of the University Campus, has 3 no. facilities with circa 922 bedspaces. Cumulatively, the proposed development and the existing student accommodation on and off campus will result in the provision of circa 4,800 bedspaces within a 1km radius of the site. Whilst such provision is significant, it only serves circa 32% of full time students attending the University. The proposed development of 1,400 student bedspaces will significantly increase the quantum of managed student accommodation in the area, in a location that is easily accessible to the University.

10.0 CONCLUSION

The proposed development on land previously filled and disturbed, adjoining the Groody Valley Green Wedge, is consistent with the policies and objectives of the Limerick Development Plan 2022 – 2028 and the Development Management Standards provided in Chapter 11.0, save where superseded by updated national Guidelines, in particular the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities 2024.

The proposed development providing 1,400 student bedspaces, significantly increase the quantum of managed student accommodation in the area, in a location that is easily accessible to the University. all in accordance with the provisions of the statutory Development Plan and relevant Guidelines. The overall building form and layout responds to its site and context and satisfactorily assimilates into the urban landscape. Further the density proposed is appropriate for a suburban site having regard to the pattern of both permitted and neighbouring development, the provisions of the Core Strategy an the site specific objectives in the Development Plan.

There is adequate service infrastructure in the area to accommodate the development proposal including water and transport infrastructure. The proposed development seeks to address and meet some of the critical need for student housing in Limerick city and its environs.

The proposed development is therefore consistent with the provisions of the Limerick Development Plan 2022 – 2028 and national guidelines, all in accordance with the proper planning and sustainable development of the area.