

Whitebox Student Campus Castletroy

**RESPONSE TO LRD OPINION**

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Groody Developments Limited

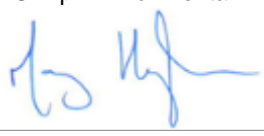
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**HRA | PLANNING**

CHARTERED TOWN PLANNING & ENVIRONMENT CONSULTANTS

## Document Control Sheet

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## **1.0 INTRODUCTION**

This report addresses the specific information requirements and issues raised by Limerick City & County Council (the planning authority) in their Large Scale Residential Development (LRD) Opinion issued on 05<sup>th</sup> December 2024 under Ref. 24/599961 in relation to the proposed Purpose Built Student Accommodation (PBSA) at Dublin Road and Groody Road, Castletroy, comprising the construction of 196 no. bed clusters (1,400 beds) distributed across 5 no. separate blocks, ranging in height from 5 - 8 storeys, with a total of 1,400 no. student bedspaces.

The opinion issued by the planning authority was subsequent to a Section 247 meeting which took place on 18<sup>th</sup> July 2024 and a Section 32B meeting which took place on 7<sup>th</sup> November 2024. Following the pre-planning meetings, the planning authority issued an Opinion in accordance with Section 32D of the Planning and Development (Housing) and Residential Tenancies Act (as amended) and advised that the documentation submitted requires further consideration and amendment to constitute a reasonable basis for an application.

It is considered that each of the 11 no. items included in the LRD Opinion have been comprehensively addressed, as detailed in the response statement below. This response document should be reviewed in conjunction with the accompanying supporting information prepared by the Design Team and other suitably qualified consultants, as cross-referenced throughout the statement below.

A Planning Report / Statement of Consistency that demonstrates the extent of consistency with the pertinent Development Plan (the Limerick Development Plan 2022 - 2028) and the relevant Section 28 National Guidelines, as required, has been prepared by HRA Planning. This document should also be read in conjunction with this response.

A number of other documents submitted with the LRD Meeting Request have been updated, and additional information has been included in this planning application as prescribed by the LRD Opinion and the Limerick Development Plan 2022-2028 ('Development Plan'). These updates respond to the LRD Opinion, ensuring that the planning authority has all the necessary information to make a well-informed decision on the proposed development.

## **2.0 INFORMATION TO BE SUBMITTED WITH THE LRD APPLICATION**

Pursuant to article 16A(7) of the Planning and Development Regulations 2001 (as amended), the planning authority notified the prospective applicant that, in addition to the standard requirements as specified in articles 20A, 22 and 23, the specific information outlined below should be submitted with any application for permission.

## 2.1 Item 1

The applicant is advised that the following is required to be submitted with the application:

No.	Item Requested	Response
a)	Details of all proposed finishes and materials including samples/photos as appropriate to be submitted.	<p>A mood board has been prepared and is submitted with the application, highlighting the proposed exterior finishes and materials, accompanied by relevant photographs. Additionally, the proposed materials and finishes are clearly indicated on all elevational drawings.</p> <p>To provide further detail, the exterior of the building will consist of two different brick colours, aluminium panels in a selected colour, and render in a selected colour.</p>
b)	Details of all proposed all internal boundaries proposed and site boundaries including, along all public roads and adjacent lands.	<p>Drawing No. PP-1.06 clearly indicates the proposed boundaries. The proposed boundaries will consist of a 1.2m high galvanized steel railing, complemented by a planted hedgerow behind it. This boundary design will be implemented along Groody Road to the east and around the secured courtyards.</p> <p>Please note that there is no physical boundary between the Groody Valley and the western extent of the site. Existing boundaries will be retained to the northwest adjacent to the lands. The existing boundary along Groody Road will remain in place until a future Bus Connects corridor is delivered by a third party.</p>
c)	The proposed open external bin store is not acceptable. Revised drawings to show closed and secure bin store should be submitted as well as confirmation of the operation and capacity of same. Details of proposed screening to ensure it is not visible from the internal road or public road should also be provided.	<p>The open external bin store has been revised to an enclosed bin storage structure. Details of this enclosed structure is indicated on revised drawing No. PP-1.05. The location of the bin storage structure is identified on drawing no. PP-1.01. The landscaping plans details the specifics on the proposed screening measures to ensure that the bin storage is not visible from the internal road or public road.</p> <p>Details regarding the operation and capacity of the bin store are provided in the Operational Waste Management Report accompanying the application. EPA Household Waste Statistics for Ireland state that 'The quantity of household waste managed in Ireland in 2021 equates to 361 kg per person, down from 372 kg/person in 2020 but up from 320 kg/person in 2019 and 314 kg/person in 2018'. Therefore,</p>

		a value of 0.989 kg of waste generated per person per day has been taken for the purposes of calculating waste to estimate the volume of waste to be generated by the development; this is based on data obtained from the EPA. It is noted that the usage factor of the student accommodation will be below that of a typical household as students will be returning home for weekends. It is also noted that the accommodation will be used for short term letting. Therefore, a factor of 75% has been applied to typical waste generation from a typical household.
d)	In relation to the proposed park to be provided within the Groody Wedge, public access from the Dublin Road shall be facilitated to include the provision of a walkway/cycleway through the site to increase pedestrian/cyclist permeability through the site.	As shown on the proposed Site Layout drawing No. PP1.01 by FHP, to improve overall permeability, public walkway/cycleway access to the Groody Valley park has been provided from both the Dublin Road and Groody Road in the form of shared surfaces (min 3m wide) through the subject site. See also Design Statement.

## 2.2 Item 2

The following documents were not submitted, these documents should be submitted with any planning application:

No.	Item Requested	Response
a)	An Architectural Design Statement,	The Architectural Design Statement (ADS) did accompany the documentation submitted for the LRD Meeting Request. The ADS has been amended to include additional information sought from the planning authority following the LRD Meeting and is included in the application.
b)	A Wind Microclimatic Study.	A Wind Microclimatic Study did accompany the documentation submitted for the LRD Meeting Request. 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 assesses 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.
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### 2.3 Item 3

A review of the submitted Environmental reports, has identified a number of issues, as follows, which should be addressed prior to submitted a planning application.

No.	Item Requested	Response
a)	The screening and NIS would benefit from a figure depicting the red line boundary of the site.	Appendix I in the Stage 1 Screening, NIS and EclA did contain a map with the boundary of the site outlined in red. However, new maps have been added to the Stage 1 Screening Report and NIS with the redline boundary defined. The red line boundary is provided in Figures 2 & 3 of the Stage 1 Screening Report and in Figure 1 of the NIS.
b)	The reports would also benefit from tables depicting the pertinent species records. The reports should also detail if the records were taken from the site alone or provide measurements e.g. Tetrad for where the records came from. At the moment the reports state "the vicinity of the site". This has been done for the bird species of the SPA but not species like Otter for the SAC.	The text within the reports clearly state what was surveyed on the site.  The tables have been updated to show Tetrads or Grid references of species where available from NBDC.
c)	I would question the validity of the record for bottle nose dolphin <i>Tursiops truncatus</i> in the vicinity of the site cited in the AA and the NIS doc. If these records are included because the author believes that the pod that inhabits the estuarine habitats near the Shannon mouth is within the ZOI of the project then this should be expressly stated, rather than "in the vicinity".	The record as per the NBDC and grid reference is included in Stage 1 Screening (page 18) and in the NIS (page 9). It is clarified in the NIS that the Bottle Noses Dolphin was recorded 8km from the site (following the course of the river).
D)	Furthermore, if the author believes, as stated in the NIS that threats to water quality may impact bottlenose dolphin through indirect pathways on water quality, then other species that utilise the estuarine habitat food webs should be considered among the QI species that could potentially be impacted.	The NIS (page 21) discusses that this impact is unlikely. The habitat area for this species is much wider than the SAC, and as a result there are no direct pathways for impact. As detailed in Table 12, there are no pressures or threats that relate to the proposed development. Although the Bottle-nosed Dolphin may travel up the River Shannon where it flows through Limerick City, it is unlikely that the development will have any Rusimpact on the pod that inhabits

		the mouth of the River Shannon estuary. The nearest records show this species approximately 8km from the site.
e)	NIS report p19 para 3.1.2 otter, the report states "There are no direct pathways identified of impact from the proposed development that would impact on the Otter population of the Lower River Shannon SAC". This statement is difficult to defend. There was a site visit that didn't detect otter however, the SAC is approximately 800m from the site. This is well within the ranging capabilities of otters normally resident within the SAC or at the very least in interaction with the SAC population. The author should consider rephrasing this statement.	<p>Please see amended information on Otter in Stage 1 Screening on page 18 and NIS page 20. The reports acknowledge potential direct impacts on the otter, as in Grids R613584 R600578, R575576 R573571 and potential to inhabit the site.</p> <p>According to the NPWS 2019 Article 17 Volume 3 Report, there were no main pressures or threats identified to the conservation status of otters. However, there is a potential for habitation of this species on the application site and mitigation measures are proposed to protect both the species and the water quality of the Groody River.</p>
f)	Mitigation measures should be laid out precisely and clearly, e.g. what gauge of protective material like geotextile or silt fencing should be used. Where the term "managed appropriately" is used – please describe this measure, as these will be considered when reviewing the application for grant/refusal and will be specified on any planning grant if considered appropriate/adequate.	Mitigation measures have been refined and rephrased where possible and necessary. Table 14 in the NIS details the Site specific mitigation measures proposed and details that a silt trap around the site for the duration of the construction phase will be erected with the use of wooden stakes, woven geotextile fabric and sandbags before the development works take place. These measures are also detailed in Section 3.3.3.3 of the Outline Construction and Environmental Management Plan (CEMP).
g)	In the EclA there are a number of mitigation measures put forward. These are welcome. In the pre-planning meeting there was mention of a biodiversity pond. All that is mentioned in the EclA is a bio-swale, constructed wetland and rain gardens. Are one of these features the pond that was described? If so it should be described clearly in this report.	A biodiversity pond is not proposed. The development proposes a constructed wetland, located within the proposed Groody Park adjoining the proposed student housing. The location of the wetland is detailed on a number of Drawings including the proposed Site Layout drawing No. PP1.01 by FHP.
h)	Given the site has been considered poorly suitable for reptiles and amphibians, and given a water feature is to be installed. The installation of habitat suitable as hibernacula or refugia for these species would be a welcome addition to the ecological enhancement and landscaping of the project.	Section in report included detailing landscape proposals around the wetland, drawing annotation revised accordingly
i)	As the landscaping plan uses planting of species to enhance the proposed area, this has been reviewed also. The used of fertilisers and herbicide should not occur in close proximity to the aquatic habitats on site.	The use of fertilisers and herbicide is not proposed in close proximity to aquatic habitats on site and shall only be used in accordance with best practice.
j)	The landscaping plan suggests that the establishment of particular species of plant	The Landscape Specification has been updated to state that these species will be let



	described as “noxious weeds” will not be permitted. Plant species such as all thistle species and ragwort are extremely valuable from a biodiversity viewpoint and are extremely important to many pollinator species.	grow in areas designated for their biodiversity value.
k)	No non-native species that can spread of its own accord should be used during planting.	Non-native species are not proposed in the planting schedule.
l)	All planting should be Irish species of Irish provenance.	All planting comprises Irish species of Irish provenance. The EclA includes the importance of native species in pages 29 & 30 and the Landscaping Specification Report clarifies that Irish species of Irish provenance are proposed.

## 2.4 Item 4

No.	Item Requested	Response
	The Council is currently undertaking the preparation of a Blue Green Ring Masterplan and the Groody Valley is a key element to the overall proposal. The proposal should illustrate the connections of the proposed development with the project and in particular public access points.	<p>Regard has been had to all information currently available on the Blue-Green Ring Masterplan. Whilst there are no site specific details at present, it is clear from graphical images and text within documentation available, that the Groody Green Wedge is an important natural resource to the city and that it will function as a blue-green link for the eastern part of the city. In this regard, the development proposal makes provision for 3 no. separate pedestrian and cycle links (1 from Dublin Road and 2 no. from Groody Road) through the development to the proposed public park within the Groody Wedge. The proposed public park provides for 3m wide cycle and pedestrian routes as detailed on the Landscape Drawing and further referenced in the Architectural Design Statement.</p> <p>For clarity, a diagram has been included on pp.13 of the Architectural Design Statement, which illustrates the proposed connections between the development and the Blue Green Ring, as well as the public access points</p>

## 2.5 Item 5

Additional details in terms of surface water and SuDS, including revised drawings as appropriate, should be included as follows:

No.	Item Requested	Response
	The pedestrian access at the Northern end of site towards Dublin Road and UL should be a minimum of 3m, similarly the pedestrian access onto the Groody road should be	The footpath widths have been varied in the specified locations to a minimum of 3 meters. This includes the pedestrian access at the northern end of the site towards Dublin Road

	widened to 3 meters in width to provide shared access for cyclists and pedestrians.	and UL, as well as the pedestrian access onto Groody Road in the middle of the scheme. Additionally, a 3m wide path to the south has been provided, by the Groody Road roundabout, leading into the scheme. Please refer to drawing no. PP-1.01 for further details.
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## 2.6 Item 6

No.	Item Requested	Response
	In terms of access to visitor bike parking, uncovered bike stands within the public realm close to the buildings would be welcomed.	A total of 46 visitor bicycle spaces have been provided. Of these, 36 no. spaces are standard external bike stands, and the remaining 10 no. spaces are electric vehicle (EV) bike charging stands. These spaces are located in convenient and accessible areas within the scheme to ensure ease of use for visitors. The locations of the bike parking facilities includes one near the pedestrian and cycle access from the Dublin Road to the north, another in the central area of the scheme by the main entrance to Block B from the pedestrian and cycle access off Groody Road, and a third outside the main entrance to Block E, along the pedestrian and cycle access from the Groody Road roundabout.

## 2.7 Item 7

No.	Item Requested	Response
a)	<p>A revised MMP plan should include the following in addition to the requirements of the NTA's guide for Work Place Travel Plans;</p> <ul style="list-style-type: none"> <li>- The name of travel plan coordinator</li> <li>- Details of student welcome pack. The output of the Mobility Management Plan should inform future residents on the potential of the location for active travel options.</li> <li>- The provision of Go-car car sharing facilities and bike park sharing facilities or similar would be welcomed.</li> <li>- Targets for year 3 and year 5 including raised targets for cycling as per the NTA's guidance.</li> </ul>	<p>The MMP report has been updated to include the requested items.</p> <p>Section 3.24 of the Operational Student Accommodation Management Plan clarifies that the appointed Student Accommodation Manager can also be the Mobility Manager or nominated travel coordinator for the student accommodation residences. The MMP also gives further detail on the name of the Travel Plan Coordinator.</p> <p>Details of the proposed Student Welcome Pack are contained in the MMP report and also in the updated Operational Student Management Plan report.</p> <p>Subject to discussions and agreement with a local service providers, the Applicant commits to providing both shared bike spaces and car share spaces within the development. Bike park sharing facilities have been provided as detailed in response to Item 6.</p>

		The MMP has been updated to include NTA guidance for Workplace Travel Plans and also contains updated Mode of Travel Targets for Years 1, 3 and 5, taking into account the 2040 NTA Mode of Travel targets contained in the Limerick Shannon Metropolitan Area Transport Strategy (LSMATS) report.
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## 2.8 Item 8

No.	Item Requested	Response
	EV bike parking along with a shared bike parking scheme would be beneficial particularly as the UL campus is large with multiple off campus locations that students may need to access, the bike should be the preferred mode of transport for the longer local journeys.	A total of 10 no. visitor electric vehicle (EV) bike charging stands have been provided. These spaces are located in convenient and accessible areas within the scheme to ensure ease of use for visitors. One of the key locations for the bike parking facilities is outside the main entrance to Block E, along the pedestrian and cycle access from the Groody Road roundabout.

## 2.9 Item 9

No.	Item Requested	Response
a)	Stage 1 Road Safety Audit shall be signed by appropriate person.	The Stage 1 Road Safety Audit has been signed by the required appropriate persons including the Designer, Audit Team Leader and Applicant/Client/Employer.
b)	The Applicant shall demonstrate how the overhanging of vehicles will be prevented to ensure pedestrian particularly VRU's will not be impeded in the interest of safety.	The footpath widths in car parking areas have been increased from 1.8m to 2.1m in accordance with DMURS. The increase in footpath widths provides additional space and ensures that pedestrians, particularly vulnerable road users (VRUs), are not impeded. Please refer to FHP drawing no. PP-1.01 for further details and GARLAND drawing W0657-050A.
c)	Show the junction at the roundabout designed in line with the current "National Cycle Manual".	The junction at the roundabout has been designed in line with the current "National Cycle Manual" as detailed on GARLAND drawing W0657-050A.
d)	Formal pedestrian crossings, including dropped kerbs and tactile paving, should be provided at pedestrian desire lines between the proposed parking spaces and the opposite footpath adjacent the main apartment block entrances.	The layout of the development has been amended to provide pedestrian crossings at key pedestrian desire lines adjacent to the main apartment block entrances. Refer to GARLAND drawing W0657-050A indicating pedestrian crossing points, including dropped kerbs and tactile paving, between the proposed parking spaces and the opposite footpath adjacent the main apartment block entrances.

e)	There is natural pedestrian desire line between the proposed development and the shops/residential developments on the eastern side of Groody Road, the provision of a pedestrian crossing at this location should be considered.	A controlled pedestrian crossing has been provided across the Groody Road at the northern leg of the existing roundabout as detailed on GARLAND drawing W0657-050A. This allows for a natural pedestrian desire line between the proposed development and the shops/residential developments on the eastern side of Groody Road.
f)	A footpath should be provided on the western side of Groody Road.	Refer to the architectural site layout drawing PP-1.01 indicating a footpath on the western side of Groody Road.
g)	Measures should be provided to support the safe movement of pedestrians between the proposed development and developments on the eastern side of Groody Road. Show a controlled crossing from the development site across the Groody Road in the interest of safety. Full details of the crossing shall be shown. This is a bus route, therefore the Applicant shall keep this in mind if a raised crossing is to be included in the design.	A pedestrian crossing has been provided across the Groody Road at a location north of the existing roundabout as detailed on GARLAND drawing W0657-050A. The proposed red line boundary has amended to include provision of this crossing.
h)	Show adequate forward visibility for drivers on the approach to and throughout, the horizontal curves.	Adequate forward visibility for drivers on the approach to and throughout, the horizontal curves has been provided as detailed on GARLAND drawing W0657-040.
i)	Show road and footpath widths and car parking dimensions.	All dimensions have been shown on GARLAND drawing W0657-040.
j)	The Developer shall ensure that any planting within the proposed development does not interfere with sightlines.	The Landscaping Plan has been co-ordinated with the Traffic Engineer to ensure that any planting does not interfere with sightlines.
k)	A minimum of 10% of all public realm car parking spaces should be provided with functioning electric vehicle charging stations/points and the space dimensions shall comply with ZEV Universal Design Guidelines. Ducting shall be provided for all remaining car parking spaces, facilitating the installation of electric vehicle charging points/stations at a later date.	The development now includes a total of 38 no. car parking spaces. In line with the ZEV Universal Design Guidelines, 4 no. EV parking spaces are proposed, which represent more than 10% of the total parking provision. Additionally, as detailed on CSD Engineering drawing no. 105-089-EK03, ducting to serve all car parking spaces with EV charging facilities has been included for all remaining car parking spaces to facilitate the installation of EV charging points/stations at a later date.
l)	Road Markings are to be in accordance with "IS EN 1436 European Standard for Road Markings" & in accordance with the "Traffic Signs Manual". Road Signs are to be in accordance with "IS EN 1436 European Standard for Road Markings" & in accordance with the "Traffic Signs Manual".	Road Markings are detailed in accordance with "IS EN 1436 European Standard for Road Markings" & in accordance with the "Traffic Signs Manual". Road Signs shall be provided in accordance with "IS EN 1436 European Standard for Road Markings" & in accordance with the "Traffic Signs Manual". Refer to GARLAND civil engineering report.

**2.10 Item 10**

No.	Item Requested	Response
	A lighting design in line with Limerick City and County Council's Public Lighting Specification shall be submitted.	A lighting design was submitted with the information for the LRD Meeting request. The lighting design and specification report prepared by CSD Engineering is included in the application documentation.

**2.11 Item 11**


No.	Item Requested	Response
a)	<p>"Drawings and supporting information showing compliance with Limerick City and County Council's Surface Water &amp; SuDs Specification shall be submitted including revised surface water calculations by way of simulation modelling (Causeway or Micro Drainage) as follows:</p> <ul style="list-style-type: none"> <li>▪ Hydraulic modelling shall be submitted for the design of the network at a 1/30 year return period to include all pipelines that requires that no flooding occurs.</li> <li>▪ Hydraulic modelling shall be submitted for the design of the network at a 1/100 year return period to include all pipelines to show that properties are protected against flooding.</li> <li>▪ Hydraulic modelling shall clearly demonstrate that there is sufficient freeboard on the finished floor levels.</li> <li>▪ Summary of Critical Results by Maximum Level (Rank 1) for Storm Design for both the 1/30 &amp; 1/100, must include water level result so that we can establish sufficient freeboard.</li> </ul>	<p>Appendix A and Section 2.4 of the GARLAND Civil Engineering Report detail revised storm network calculations that demonstrate:</p> <ul style="list-style-type: none"> <li>• No flooding occurs in all pipelines for a 1/30 year return period.</li> <li>• In a 1/100 year return period that all pipelines are protected against flooding.</li> <li>• There is sufficient freeboard on the finished floor levels.</li> <li>• A Summary of Critical Results by Maximum Level (Rank 1) for Storm Design for both the 1/30 &amp; 1/100 that include the water level result.</li> </ul>
b)	Show permeable paving for the parking bays, show them connected together with access chambers for maintenance and with overflow system connected to the internal surface water system	GARLAND drawing W0657-020D shows permeable paving for the parking bays connected together with an overflow system and access chambers for maintenance.
c)	Submit a detailed cross section through the permeable paving showing construction build up for each layer with clear specifications, which shall include for an overflow system.	GARLAND drawing W0657-024A provides a detailed cross section through the permeable paving showing construction build up for each layer with clear specifications and an overflow system.
d)	Submit a detailed cross section through the bioretention features including green roofs and rain gardens, showing construction build up for each layer with clear specifications, which shall include for an overflow system.	GARLAND drawing W0657-024A shows a detailed cross section through the bioretention features including the rain gardens, showing construction build up for each layer with clear specifications and an overflow system. Refer

	The discharge levels shall not exceed 2 l/s/ha or Qbar whichever is the greater restriction.	to Appendix C of GARLAND Civil Engineering Report for cross sections of the green roof.
e)	The proposed wetland shall be fenced off in the interest of safety. The design of the fencing shall be submitted.	GARLAND drawing W0657-020D shows the location for a timber knee fence and drawing W0657-024A provides details of the fence.

## 2.12 Advice Note

No.	Item Requested	Response
	<p>The applicant is advised that should planning permission be granted, a bat activity survey will be required to enable the assessment of the potential impact of the proposal on bats using habitats in the area. This should be conducted in the oncoming season of optimum survey time for bats (April – September inclusive).</p>	<p>An initial assessment was carried out during the EcIA site survey on 6<sup>th</sup> 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 &amp; Marnell, 2006).</p> <p>During the ecological site survey, 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. However, the trees adjacent to this drainage ditch (at the southern boundary of the site) will remain undisturbed as part of the development.</p> <p>In addition, there was only one mature tree on site suitable as a bat roost, a White Willow <i>Salix alba</i>, 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.</p> <p>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.</p> <p>The following measures were included in the EcIA to mitigate for bats using the site:</p> <p><i>'Any tree removal or undergrowth cutting back should take place during the bat hibernation period (1<sup>st</sup> November to 1<sup>st</sup> 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.</i></p> <p><i>All works to be completed during daylight hours so as to minimise disruption to nocturnal animals.'</i> (Ress Ltd, 2024)</p> <p>In addition, there was consultation with the lighting engineer on the design of lighting for the site based on the following guidelines:</p>



	<ul style="list-style-type: none"> <li>▪ Bat Conservation Trust (2023) <i>Guidance Note GN08/23 Bats and Artificial Lighting At Night</i>. Institute of Lighting Professionals. Warwickshire. UK</li> <li>▪ Bat Conservation Ireland (2010) <i>Bats and Lighting. Guidance Notes for: Planners, engineers, architects and developers</i>. BCI.</li> </ul> <p>According to based practice guidelines (Kelleher &amp; Marnell, 2006) bat surveys are only required when potential roosting 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.</p> <p>All measures in relation to bats within the development site are</p>  <p>outlined in red.</p> <p>precautionary / enhancement measures.</p> <p>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.</p>
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### 3.0 CONCLUSION

In conclusion, it is respectfully submitted that all the issues raised by Limerick City & County Council in the LRD Opinion have been comprehensively addressed as outlined above as part of the subject LRD planning application.

The accompanying Planning Report / Statement of Consistency includes a full rationale for the proposed development. The site specific design strategy has been shaped by a number of professional

reports including noise, ecology and microclimate assessments. Further, a number of adjustments, as detailed in this report, have been made in direct response to the feedback received from the planning authority during the pre-application consultation stages. The proposed development will provide an appropriate form of high-quality student apartment accommodation at this site, which integrates effectively with the Groody River Valley Wedge. The proposed development is consistent with national, regional, and local planning policies at all levels and represents an efficient use of a serviced site within a built up urban area, in close proximity to public transport. Located near existing employment nodes and well served by public transport, the development will meet contemporary urban living standards.

It is submitted that the proposed development therefore is in accordance with the proper planning and sustainable development of this area and that the issues raised in the Planning Authority's LRD Opinion have been fully addressed by this Response and the accompanying planning application documents.