



HRA | PLANNING

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Planning & Placemaking Department,
Limerick City & County Council,
Civic Buildings,
Dooradoyle,
Limerick

16th May 2025

Re: Further Information Response P25/60113

LRD Application – Proposed Purpose-Built Student Accommodation (PBSA) scheme on land fronting the Groody Road and Dublin Road, Castletroy, in the townland of Newcastle, Limerick for a period of seven years.

Dear Sir / Madam,

We have been requested by our client Groody Developments Limited to submit a response in respect of a further information request issued for a proposed Largescale Residential Development (LRD) application to Limerick City & County Council.

A comprehensive response has been prepared, and it is proposed to address each of the four issues raised by the planning authority below and in the accompanying documents submitted with this letter, including:

- Revised EIA Screening Report
- Revised AA Screening Report
- Revised Natura Impact Statement
- Revised Ecological Impact Assessment
- Revised Construction Environmental Management Plan
- Water Framework Directive Assessment Report
- Revised Phasing Plan
- Architectural Drawings demonstrating connectivity with the Blue Green Infrastructure Ring

Item 1a Groundwater Movement

Section 3.3.3.2 of the CEMP already contains measures for management of groundwater contamination. In addition to submission of a revised AA Screening Report and Natura Impact Statement, a Water Framework Directive Assessment Report has been prepared by Traynor Environmental which assesses

risk to the
5.1.2 of the
Pathway-



RTPI
mediation of space · making of place

Limerick City East Ground Water Body in Section report. A risk-based assessment of the Source-Receptor Model and the potential risk linkages

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associated with the Construction Phase and Operational Phase of the Proposed Development was undertaken.

Item 1b Migratory Fish

Inland Fisheries Ireland records were reviewed for the Shannon and Groody catchment in Limerick and there were no records of any of the QI aquatic species (Ryan et. al., 2018). However, consultation with the IFI Senior Fisheries Environmental Officer for the River Shannon catchment indicated that although the Groody is classified as an accessible river for Salmon, there are a number of barriers down river preventing migration from the River Shannon. However, there may a small number of Salmon overcoming these barriers and accessing the River Groody. There are also no records for any of the three Lamprey species, however the IFI Officer indicated that it is likely that River lamprey are present in the River Groody (See Appendix iv). On foot of this information migratory fish were screened in for consideration and further addressed in the NIS.

Item 1c Water Quality and Impact on QI Species

The NIS clarifies that mitigating measures are proposed and will be required to ensure there is no surface runoff during the construction works and also during the operation of the development. As the current pH recorded on 24th April 2025 for the River Groody adjacent to the site was pH8.07 and in the drainage ditch 7.46 (RESS Ltd, 2025), the current pH is unlikely to have any effect on any Salmon in the River Groody. To minimise these pressures and threat of mixed source pollutants and the resultant effect on BOD and pH, site-specific mitigation measures are required during both the construction and operation phases to protect any Atlantic salmon that may be occupying the River Groody. Measures are also detailed in the Water Framework Directive Assessment Report.

Item 1d Habitat & Birds

In addition to a site survey on January 6th 2024, the site was again surveyed on the 23rd and 24th of April. Neither Skylark nor Meadow Pipit were found. There were no ground nesting birds as the site was heavily grazed and trampled by horses. The site was also very wet. The AA Screening Report and the EclA have been updated with recent photographs from the site showing the extent of trampling by horses.

Item 1e Bats

An initial bat assessment was carried out during the EclA site survey on 6th of January 2024, for the suitability of habitats onsite to support bat roosting, foraging and commuting. Two mature trees were identified at that time with potential for roosting. One tree to the south east was located outside of the development site whilst the other tree, located adjoining the River Groody is to remain undisturbed. which is located outside of the redline boundary of the site was identified as suitable as a bat roost. This is the White Willow *Salix alba*, and which comprises part of the Groody Valley Green Wedge.

In response to the further information request, a further dawn and dusk bat survey was undertaken on the 23rd and 24th of April 2025. This survey identified the two potential trees as roosting sites, namely the White Willow *Salix alba* to the south east of the site and the Grey willow *Salix cinerea* trees at the south western extremity of the site adjoining the River Groody. These trees will not be affected by the development proposal as they remain part of the Groody Park which is to remain undisturbed as part of the development, save for the provision of drainage infrastructure and walking / cycling routes.

The attached Bat Survey recommends mitigation measures in terms of lighting, provision of bat boxes, controlling rodenticide usage and maintenance. The Bat Survey has also been addressed in the AA Screening Report and in the NIS.

Item 1f Cumulative Developments

A revised set of documents including AA Screening, NIS and EIA Screening Reports are attached to include assessment of the application by Limerick City & County Council for a new distributor road in the cumulative development sections. It is noted that this development has not yet been consented and has just been lodged with An Bord Pleanála.

This has been done notwithstanding the EIA Directive only requires that existing and approved projects be taken into account in the consideration of cumulative effects,

Item 2 Phasing Plan

The phasing plan now includes delivery of the public park, identified as part of Phase 1 as detailed on Architectural Drawing F1-03-A. A section of the park adjoining the student complex will not be delivered until Phase 2 is complete as access is required for construction traffic to and from the construction compound. However, until completion of Phase 2 and delivery of the park in its entirety, provision shall be made for dedicated public access to the park.

Item 3 Site Boundary Treatment

Details of proposed site boundary treatments are detailed on Architectural Drawing FI-04-A.

Item 4 Connectivity of Limericks Blue Green Infrastructure Ring

Section 4.0 of the Architectural Design Statement submitted with the application detailed how sustainable and efficient movement was envisaged with specific regard to the Green and Blue Infrastructure Network proposed for the area. Page extract attached for convenience.

Drawing FI-05-A has been prepared by FHP providing greater detail on the northern extent of the site, adjoining the Dublin Road. A pedestrian crossing has been facilitated across the Dublin Road to ensure greater connectivity between the site and the BGI ring.

I trust that this clarifies all outstanding issues at this time, and I look forward to a positive decision. In the meantime, should you have any queries please do not hesitate to contact the undersigned.

Yours sincerely,



Mary Hughes MIPI
Director HRA | PLANNING