

Strategic Housing Development – Statement of Response to the Notice of Pre-Application Consultation Opinion

Regal Park Developments Limited
Walkers Lane, Annacotty, Limerick

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Title:	Strategic Housing Development – Statement of Response to the Notice of Pre-Application Consultation Opinion	
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1.0 INTRODUCTION

Following consultations with Limerick City & County Council under Section 247 of Planning and Development Act, 2000 (as amended), a request to enter into pre-planning consultations with An Bord Pleanála (The Board) was submitted on 11th March 2019 and a subsequent pre-planning consultation meeting was held on 27th March 2019.

The Board issued a Notice of Pre-Application Consultation Opinion on the 16th April 2019 which states that the Board *'is of the opinion that the documents submitted with the request to enter into consultations require further consideration and amendment to constitute a reasonable basis for an application for strategic housing development'*.

Three items were identified to be addressed as follows:

- Architectural Design and Overall Layout
- Density
- Roads Infrastructure Access and Car Parking

The Board also requested, pursuant to article 285(5)(b) of the Planning and Development Act 2000 (as amended by the Residential Tenancies Act 2016), the provision of the following specific information;

1. A detailed report outlining the proposed works to be undertaken to Walkers Lane and Castletroy College Road in terms of pedestrian and cycle facilities, public lighting and any road upgrade works necessary to facilitate the development and provide for appropriate connections to the wider area. The report should also detail who is going to undertake the works required and the timelines involved relative to the construction and completion of the development.
2. A report that specifically addresses the proposed materials and finishes to the scheme including specific detailing of finishes, the treatment of balconies in the apartment buildings and duplex units, the landscaped areas, pathways, entrances and boundary treatments. The treatment / screening of access areas to exposed areas of basement ramps to apartment blocks as well as the treatment of the ground floor and interface with the public realm should also be addressed. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinctive character for the development. The documents should also have regard to the long term management and maintenance of the proposed development.
3. Photomontages / CGI's to include distant views of the development when viewed east and west along the R445, from the access road to the Technology Park and from Castletroy College Road.
4. A Lifecycle Report shall be submitted in accordance with Section 6.3 of the Sustainable Urban Housing Design Standards for New Apartments (2018).
5. A report that addresses issues of residential amenity (both existing residents of adjoining properties and future occupants), specifically how the proposed apartment building will limit the potential for overlooking and overshadowing. The report should include full and complete drawings including levels and cross sections showing the relationship between the development and adjacent residential units. A comprehensive daylight and sunlight analysis assessing proposed residential units and open spaces should also be included.

6. A detailed schedule of accommodation which shall indicate compliance with relevant standards in the Sustainable Housing Design Standards for New Apartments, Guidelines for Planning Authorities 2018
7. A layout plan that details the location and appropriate quantity of bicycle spaces at basement and surface level. Clarity should be provided as to basement cycle parking will be accessed.
8. A Traffic and Transport Assessment (to include Road Safety Audit) for the proposed development.
9. A report prepared by a suitably qualified and competent person demonstrating specific compliance with the requirements set out in the Design Manual for Urban Roads and Streets.
10. A plan of the proposed open spaces within the site clearly delineating public, semi-private and private spaces and an indication of any open spaces to be taken in charge
11. Detailed report regarding how the appropriate Sustainable Urban Drainage Systems have been incorporated into the development.
12. Phasing plan for the proposed development which includes phasing arrangements for delivery of public open spaces and Part V provision
13. Landscaping proposals including an overall landscape masterplan for the development site including detail of tree planting, quantity, type and location of all proposed hard and soft landscaping including details of play equipment, public lighting, pedestrian entrances and boundary treatments. Resolution of any conflict between location of attenuation tank and trees to be preserved.
14. Construction and Environmental Management Plan to include a plan for the treatment and removal of Japanese Knotweed.
15. Waste Management Plan
16. Archaeological Impact Assessment
17. Noise Report detailing in particular how noise impacts from the R445 will be mitigated
18. Bat Report

Pursuant to Article 285(5)(a) of the Planning and Development (Strategic Housing Development) Regulations 2017 the Opinion also requested that 7 no. bodies be informed in the event of making an application.

It is proposed to provide a response to the issues requiring further consideration in the first instance; then to confirm submission of items required; and thereafter to confirm submission of information to the statutory bodies.

2.0 ISSUES REQUIRING FURTHER CONSIDERATION

2.1 Architectural Design and Overall Layout

Following pre planning consultations with the Board, a comprehensive redesign was undertaken of the scheme. Significantly, the archaeological constraints within the site have been resolved thereby affording greater opportunities within the site to facilitate a more coherent and integrated development. The overall architectural style has been revised such that the development is now

more contemporary in nature. Building height, unit mix, unit typology, unit numbers and the architectural style have all been revised in order to deliver a design reflective of the Board's requirements, whilst also retaining important site characteristics and features.

Overall the number of units proposed has increased from 126 no. to 137 no. units. The apartment blocks have been reduced in height from 2 no. blocks of 7 stories each to 1 no. block of 3 – 4 stories and 1 no. block of 4 – 5 stories. Whereas the remainder of the original scheme comprised two storey units, the scheme now comprises mainly of three storey apartment and duplex units, with the two storey element confined to the eastern extremity of the site, where the site adjoins existing established housing.

2.1.1 Responding to site context and constraints

The site context and its constraints have informed the design proposal. Bound on three sides by public roadway and to the east by 2 no. houses, there is a fall of circa 5m across the site from the south east corner to the north west corner. Accordingly, the scheme has been designed with an increase in building height across the site from east to west.

Two storey semi-detached units back onto the eastern boundary of the site thereby respecting the residential amenities of the neighbouring two storey properties. The two-storey element increases to three storey within the central area of the site and at the northern and southern site boundaries fronting onto the Dublin Road and Walkers Lane. The scheme culminates with 2 no. 4 – 5 storey apartment blocks on the western site boundary, which address the Annacotty Roundabout.

The three storey duplex units on the northern site boundary have been set back to facilitate retention of the mature trees dominating this area of the site. This tree group is considered to be a defining feature on the approach road to the city. The trees are located at the top of a steep bank which is approximately 2m in height on the eastern end and grades down to approximately 0.5 m above the adjacent path level on the western end of the bank.

As a collective group they not only afford identity to the site, but they are also identified in the Tree Survey as containing a number of notable specimens including Ash *Fraxinus excelsior* and Sycamore *Acer pseudoplatanus* species. These trees are considered either category C or B trees in general although tree no. 0756 is a veteran Ash and is considered to be in category A2,3. The ash tree is also considered to be of moderate suitability for roosting bats and supports a single roosting common pipistrelle bat, as confirmed in the Bat Survey. Having regard to the foregoing, it is considered that the trees and the embankment are important site features that need to be retained.

The three storey duplex units defining the southern site boundary provide a strong urban edge whilst also affording adequate set back to facilitate pedestrian and cycle routes along the southern site boundary. The urban edge definition provided on the northern and southern site boundaries culminate with 2 no. 4 – 5 storey apartment blocks on the western boundary orientated to address both the Casletroy College Road and the Annacotty Roundabout. The apartment blocks have been set back within the site to facilitate connectivity with the scheme and to facilitate future road widening which may be delivered by the Council should the need arise in the future.



2.1.2 Full investigation of optimal layout in context of archaeological features

It is proposed to resolve the archaeological feature (enclosure) at the north western corner of the site. A Method Statement has been prepared by Aegis Archaeology which details the methods proposed for the full archaeological excavation of archaeological features found during archaeological testing undertaken by RedArc Consulting Ltd. This Method Statement should be read in conjunction with the initial Archaeological Assessment prepared by RedArc Consulting.

Archaeological resolution on site has enabled a comprehensive re-evaluation of the scheme particularly at the north western corner of the site. The apartment blocks no longer have to maintain a buffer from the archaeological feature thereby enabling re-positioning and re-orientation to address both the Castletroy College Road and the Annacotty Roundabout.

2.1.3 Appropriate transition of height and scale across the site

The apartment blocks have been reduced in height from 2 no. blocks of 7 stories each to 1 no. block of 3 – 4 stories a higher block of 4 – 5 stories, closest to the roundabout. Whereas the remainder of the original scheme comprised two storey units, the scheme now comprises mainly of three storey apartment and duplex units, with the two storey element confined to the eastern extremity of the site, where the site adjoins existing established housing.

The height of the apartment blocks was reduced to facilitate acceptable levels of daylight and sunlight internally within the scheme and to facilitate a more coherent and integrated design approach. The revised layout now ensures better integration between the apartment blocks and the remainder of the scheme. The building height now reduces evenly across the scheme in contrast to the previous proposal which saw a radical jump from the 7 story apartment blocks to a limited number of 3 story duplex units and primarily 2 storey detached and semi-detached units.



Figure 1.0 Indication of height across the site

2.1.4 Coherent architectural approach in terms of building style, materials and finishes

Light brown de-saturated brick, metal cladding, dark grey / black alu-clad windows and metal railings will be used throughout the scheme across the different typologies. Use of a high-quality palette of materials will achieve a unified contemporary look across the development site.

Material selection is detailed on the accompanying drawings and is further addressed within the Architectural / Urban Design Statement prepared by Healy Partner Architects.

2.1.5 Creates a strong urban edge having regard to the extent of road frontages

Whereas the previous design proposal at pre-planning stage had gable ends fronting onto the Dublin Road (northern boundary); had open space with an internal road separating two storey housing from Walkers Lane (southern boundary) and had 2 no. blocks angled onto the Castletroy Road (western boundary), the current proposal before the Board seeks to create stronger urban edges on all three boundaries.

Three storey units address the Dublin Rod separated by existing mature trees and a grass embankment. Three storey units have been pulled southwards to address Walkers Lane, with adequate space provided between the units and the road to accommodate a pedestrian and cycle path along with some privacy planting.

On the western boundary the apartment blocks now front onto the Castletroy Road, set back from the sites edge to facilitate circulation and the provision of a bus stop.

2.1.6 Appropriate range of housing typologies and mix

The pre-planning proposal and the current proposal under consideration can be compared as detailed in Table 1.0

	No. of Units	1 bed	2 bed	3 bed	4 bed
Pre-Planning Proposal	126	17 no. (13%)	72 no. (57%)	10 no. (8%)	27 no. (21%)
Current Proposal	137	9 no. (5%)	77 no. (56%)	44 no. (32%)	7 no. (6.5%)

Table 1.0 House Mix

The proposed development provides for diverse housing typologies including 20 no. different unit types and sizes. Included in this mix are apartments, ground floor apartment units with duplex units overhead, semi-detached units and terraced housing.

2.1.7 Design of the apartment blocks to ensure they address the Annacotty roundabout and the R445

The apartment blocks have been redesigned and re-orientated to address the R445 and the Annacotty roundabout as detailed on the site layout plan. This design solution was previously prevented by the archaeological issues on site. However, having a proposal to formally resolve the archaeological features on site, the blocks can now move northwards closer to the roundabout.

2.1.8 Design and height as the optimal architectural solution for this strategic gateway site

The Annacotty roundabout, although located on an arterial route into the city, is not necessarily considered to be of a strategic / gateway nature, particularly having regard to the zoning provisions in the Castletroy Local Area Plan 2019 – 2025, which further extend in an eastern direction towards the Mulcair River.

The land surrounding the Annacotty roundabout is zoned for residential use to the south and industrial use to the north. Permitted industrial buildings to the north have been set back from the Dublin Road and the Annacotty roundabout, thereby resulting in a lack of physical presence. Similarly, on the southern side of the Dublin Road, the character of the area is dictated by low scale and low density residential development also resulting in a lack of physical presence. Accordingly, having regard to the existing characteristics of the area, a balanced approach to height had to be achieved, such that greater height was / is necessary but without resulting in an imbalance in form between the northern and southern sides of the Dublin Road.

It is considered that a maximum height of 5 stories (16.73m) addressing the roundabout, decreasing to three stories across the site before stepping down to the established building height of two storeys, is an appropriate response to the existing and future character of the area.

2.1.9 Creation of a hierarchy of high quality, functional and amenable public and semi-private open spaces with maximum surveillance, amenity and pedestrian connectivity.

The public realm has been comprehensively designed in the context of the overall need of residents living within the development and the availability of a public neighbourhood parks within 490m of the site.

The development proposal comprises private open space delivered through the provision of balcony space serving the apartment units and duplex units and dedicated gardens serving the semi detached and terraced units.

Communal open space is also provided serving the apartment units within the apartment blocks, delivered through the provision of 2 no. rooftop gardens and communal amenity space at ground floor level, demarcated with defensible landscaping around the boundary. Some 452sqm of dedicated communal open space is provided within the development proposal.

Public open space is provided at four different locations throughout the development, including a passive linear park along the northern site boundary incorporating established trees and a walkway; a passive seating area to the front of Block A incorporating benches and planters; a gently sloping area between Block A & B providing connections to the proposed bus stop and a pocket park to the front of Block B with a dedicated play area. The area of public open space within the development comprises 3,954sqm or 15% of the overall site in accordance with the open space requirements in the Castletroy Local Area Plan.

All of the public and communal open space benefits from natural surveillance with overlooking windows.

2.1.10 Indicate how 12 criteria set out in the Urban Design Manual has been complied with.

The 12 criteria set out in the Urban Design Manual have been comprehensively addressed by the project architects, Healy Partner Architects in their Architectural / Urban Design Statement. This report demonstrates how the overall development proposal complies the 12 core principles.

2.1.11 Need, Scale and Location of the Creche Facility

The proposal at pre planning stage provided for a creche facility with capacity for 50 no. children. The need, scale and location of the creche facility was questioned at the pre planning meeting.

The proposal for a creche was examined having regard to the capacity of existing creche facilities and their ability to accommodate additional children. Further, regard was had to a number of large scale creche proposals within walking distance of the site.

The *'Childcare Facilities Guidelines for Planning Authorities 2001, (DEHLG)* recommends that planning authorities should require the provision of at least one childcare facility for new housing areas unless there are significant reasons to the contrary for example, development consisting of single bed apartments or where there are adequate childcare facilities in adjoining developments. The Guidelines recommend that for new housing areas, an average of one childcare facility for each seventy-five dwellings would be appropriate although it does state that the threshold for provision should be established having regard to the existing geographical distribution of childcare facilities and the emerging demographic profile of areas.

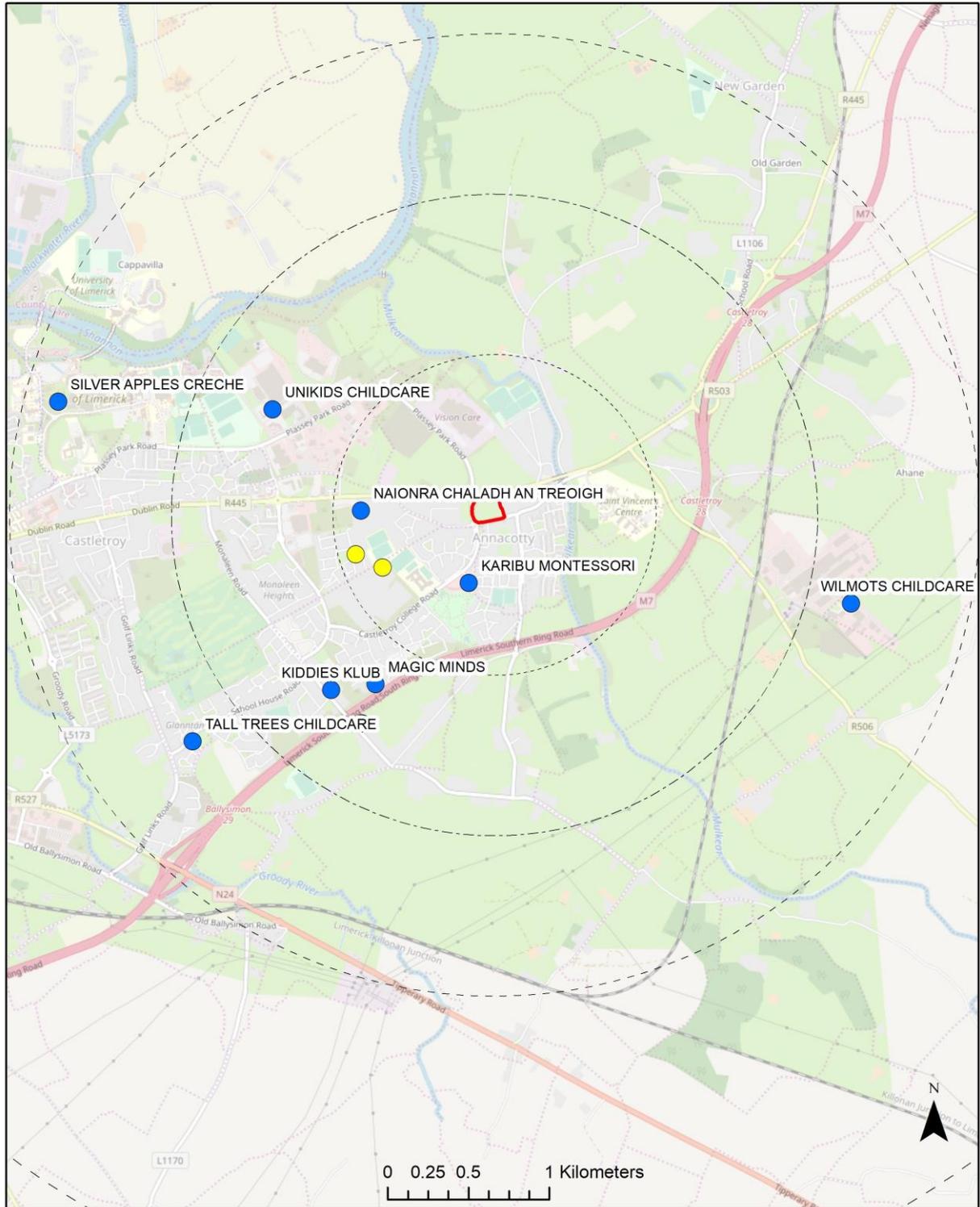
Having regard to the Guidelines, a creche facility accommodating 20 no. spaces is required for each 75 no. dwellings. Apportioning this requirement to the proposed development of 137 no. units, results in a theoretical requirement of 36 childcare spaces. However, having regard to the fact that the 1 bed units within the development are unlikely to generate a childcare requirement, omitting the 1 bed units generates an overall potential demand of 34 childcare spaces.

There are 8 no. creches, as identified in Figure 4.0, which are located within a 3km radius of the site – a reasonable distance of the application site having regard to employment and educational locations in the surrounding area. These 8 no. creches were contacted by phone in September 2019 (beginning of school year) to establish their capacity. In some instances, the information was not secured from the operators, due to perceived commercial sensitivity and therefore TUSLA reports, which represent a snapshot in time were relied upon in such instances. Table 2.0 below provides an overview of capacities within existing creche facilities.

Creche	Capacity	Occupancy	Availability	Method of Securing Information
Karibu Montessori	138	138	0	Confirmed by Phone
Naoinra Chaladh An Treoigh	22	22	0	Confirmed by Phone
Unikids Childcare	65	65	0	TUSLA Report – Sept 2018
Kiddies Club	27	27	0	Confirmed by Phone
Magic Minds	11	11	0	TUSLA Report – April 2018
Silver Apples Creche	50	46	4	Confirmed by Phone
Tall Trees Childcare	120	82	38	TUSLA Report – May 2018
Wilmots Childcare	144	104	40	TUSLA Report – Nov. 2018
Total	577	495	82	

Table 2.0 Capacity of Creche Facilities

Table 2.0 confirms creche facilities capable of accommodating 577 no. children within 3km of the subject site, with capacity for an additional 82 no. children. The proposed development is only likely to require capacity for 34 no. children. Accordingly, it is submitted that there is adequate childcare capacity within 3km of the site and accordingly an additional childcare facility is not required to service the proposed development. Although it is acknowledged that the TUSLA information is over a year old, it must be recognised that the capacity in 2018 was over twice that required for the proposed development, and this indicates a level of tolerance in the industry



- Site Boundary
- Creche
- Permitted Creche
- 1km of site
- 2km of site
- 3km of site



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Figure 4.0 Location of Childcare Facilities

Further it should be noted that planning permission has been secured for an addition 2 no. creche's within 1km of the subject site, identified in yellow in Figure 4.0. Cumulatively these new creche facilities will provide capacity for an additional 288 no. children (P19/547 – 181 child creche & P19/492 – 107 child creche). Whilst these creche's are intended to accommodate existing and future residential development in the area, they nonetheless provide additional capacity in a fluid childcare market.

Having regard to the above analysis, it is not proposed to provide for a childcare facility as part of the proposed development. However, if the Board is minded to disagree and to require such a facility irrespective of the foregoing assessment, it is confirmed that the single storey communal facility attached to Apartment Block A to the north, could easily be amended to accommodate a childcare facility capable of accommodating 34 no. children.

2.2 Density

The density of the proposed development has increased over and above that presented at the pre-planning meeting. At pre planning stage the density of the development was proposed at 48.9 units per hectare. The density currently before the Board for consideration is 53 units per hectare. The scheme has been designed at a sufficiently high density to provide for an acceptable efficiency in serviceable land usage and in accordance with the recommended densities in *'The Sustainable Residential Development in Urban Areas Guidelines 2009'*.

The Guidelines encourage the sustainable and efficient use of land and seek to ensure that sustainable travel patterns are encouraged. It recommends a number of qualitative standards regarding open space provision, design, accessibility, shared use and SUDs. All of these elements have been incorporated into the proposed design approach. Whilst some 15% of the site has been allocated as useable open space, it is the quality of that open space which is considered to be most important. In this regard the landscaping plan seeks to enhance the quality of open space whilst providing for local pocket parks and play facilities.

Whilst the proposed development is located within 200m of a bus stop, the 304A bus only connects with the city every 30 minutes. The NTA are currently preparing a Draft Limerick – Shannon Metropolitan Area Transport Strategy and although not yet published, it is anticipated that a Quality Bus Corridor (QBC) will be accommodated on the Dublin Road to facilitate an increased public transport service, in the future. The Guidelines promote minimum net densities of 50 units per hectare in proximity to public transport corridors and such minimum densities were advocated at the pre-planning meeting.

The proposed development at 53 units per hectare is thus in accordance with recommended standards as set out in the Sustainable Residential Development in Urban Areas Guidelines 2009.

2.3 Roads Infrastructure Access and Car Parking

A proposal to resolve the archaeological features on site, amongst other things, afforded an opportunity to redesign the scheme, with a resultant change to the layout of the internal road design. The extensive turning circle at the north western corner of the site is no longer proposed. The design of the scheme follows the principles of a block layout with one circuitous road providing access to all units within the scheme.

2.3.1 Car & Bicycle Parking Strategy

Provision has been made for 183 no. car parking spaces and 120 no. bicycle spaces on site, having regard to the proximity of the site to the Newtown Neighbourhood Centre south of the site, the existing bus stop on the Dublin Road, the proposed QBC intended on the Dublin Road and the significant employment node across the Dublin Road from the site namely Plassey Technological Park.

The Limerick County Development Plan (CDP) Table 10.5 requires the provision of 233 no. car parking spaces. Table 3.0 provides a comparison between the CDP requirement and the parking allocation of units proposed on the site.

Unit Type	CDP Ratio Requirement	Ratio Proposed
1 bed apartment	1 space per unit	1 space per unit
2 bed apartment	1 space per unit	1 space per unit
3 bed apartment	2 spaces per unit	1 space per unit
Visitor Apartment	1 space per 2 units	1 space per 4 units
3 bed house	1 space per house	1.5 spaces per unit
4 bed house	2 spaces per house	1.5 spaces per unit
Visitor House	1 space per 3 dwellings	None

Table 3.0 Car Parking Ratios

The breakdown of proposed car parking spaces within the development is detailed in Table 4.0. A total of 179 spaces are provided plus an additional 4 no. spaces including 2 no. spaces dedicated to co-travel and 2 no. spaces with electric charging points.

Unit Type	No. of Units	Proposed Ratio	Spaces Provided
Housing	25	1.5 per unit	38 spaces
Duplex Units	51	1 per unit + 1 visitor space per 4 units	64 spaces
Apartment Blocks	61	1 per unit + 1 visitor space per 4 units	77 spaces
Total			179 spaces

Table 4.0 Breakdown of Car Parking Provision

The car parking has been distributed between basement and surface car parking. The basement parking extending under Apartment Block B provides for 61 no. car parking spaces and is intended to serve all apartments in Block A & B.

Surface car parking, accommodating 122 no. car parking spaces, provides for 86 no. spaces to serve the immediate needs of residential units; 28 no. visitor spaces; 2 no. dedicated electric charging point spaces; and 2 no. spaces for co-travel.

The visitor car parking spaces (highlighted in red) are primarily located in front of the Apartment Blocks as detailed in Figure 5.0. The car parking spaces identified in yellow are intended to serve the residential units and are distributed around the scheme accordingly. Each unit within the development will be sold with 1 no. dedicated car parking space with the remaining spaces unallocated. The car parking has been integrated into the public realm with the planting of trees and surface treatment.

A total of 120 no. bicycle spaces are provided in three dedicated locations throughout the site, identified in blue in Figure 5.0. The covered bicycle shelters are distributed evenly throughout the scheme and are intended to serve the apartments and duplex units. The 25 no. housing units will accommodate bicycles within the curtilage of their own unit.



Figure 5.0 Car Parking Arrangements on Site

3.2 Access, Internal Layout and Compliance with DMURS

Access to the site has been relocated further to the east, away from the existing Castetroy College Road and Walkers Lane junction. The access has been designed in accordance with DMURS accommodating 2.4m x 49m visibility splays.

The turning circle proposed at pre-planning stage has been omitted from the scheme and no turning circles are now proposed within the development. Instead the internal road system facilitates a circuitous road providing access to all units within the scheme.

A Statement of Compliance with DMURS has been prepared by CST Group.

2.3.3 Extent of Works to Walkers Lane

An existing public footpath extends from the Castletroy College Road to approximately halfway across the southern site boundary on Walkers Lane. It is proposed to set back the southern site boundary in accordance with Drawing No. 118271-3002 from CST Group and to provide for a dedicated cycle path along the full extent of the site boundary. Similarly, it is proposed to provide for a footpath adjoining the cycle path and within the confines of the subject site. There is no footpath or cycle-path to the east of the site on Walker's Lane. Although it would be desirable to connect into a pedestrian footpaths and cycle lane on Walkers Lane with a linkage through to Annacotty roundabout, the land necessary to effect such delivery is outside the control of the applicant. Such provision can be made in the future, if / when such infrastructure is delivered by the Council. There is an existing footpath and cycle-path to the west of the site and the proposed development will connect into these. Both the footpath and the cycle-path will be complimented with public lighting.

2.3.4 Extent of Works to Casteltroy College Road

On the western site boundary adjoining the Castletroy College Road there is an existing footpath, cycle-path and green verge.

It is understood from pre planning discussions with Limerick City & County Council that the Castletroy College Road may need to be widened sometime in the future. Accordingly, provision has been made within the design proposal for a set-back to facilitate future road widening by the Council

The provision of a bus-stop was discussed at pre-planning stage. The Operations and Management Section of the Council did request that a proposed bus-stop/layby be delivered by the applicant on the Castletroy College Road. Such provision was made by the applicant and detailed on the Site Layout Drawings. However, following a discussion with the Operations and Management Section (Traffic & Transportation) on the 20th March 2020, the design team was advised that a bus-stop is no longer required on the Castletroy College Road.

It is understood that the NTA in associated with Limerick City & County Council is preparing a Draft Limerick – Shannon Metropolitan Area Transport Strategy and although not yet published, the study is proposing a Quality Bus Corridor (QBC) will be accommodated on the Dublin Road to facilitate an increased public transport service, in the future. Therefore, according to the Operations and Management Section there is no requirement for a bus stop on the Castletroy Road. The Dublin Road already has a dedicated bus stop to the east of the site and which can be easily accessed from the site via pedestrian connections directly onto the Dublin Road / Annacotty Roundabout.

However, if it is a case that the Board are of the opinion that a bus stop / layby should still be accommodated on the Castletroy College Road, then such provision can easily be facilitated at a location on the edge of the road between Apartment Blocks A & B.

2.3.5 Pedestrian and Cyclist Connectivity

Provision has been made for both pedestrian and cycle paths around the perimeter of the site, connecting into existing infrastructure where available. The delivery of both pedestrian and cycle paths from the site to Annacotty village is the responsibility of the Council, as the land necessary for such delivery falls outside the control of the applicant.

Importantly, the site is effectively connected with both footpaths and cycle-paths to the Newtown Neighbourhood Centre south of the site along with Castletroy College and the Neighbourhood Park.

Within the site a number of desire lines have been accommodated to facilitate connectivity with the surrounding area including a pedestrian way between Apartment Blocks A & B to the proposed bus-stop; a pedestrian route to the north west corner of the site to access the Dublin Road and a pedestrian route to the south west corner of the site to facilitate access onto the Castletroy College Road.

3.0 SPECIFIC INFORMATION SUBMITTED

3.1 Works to Public Road

Section 4.1.8 of the Development Overview & Planning Compliance Report and the previous paragraphs in this report details the proposed works to be undertaken to Walkers Lane and Castletroy College Road in terms of pedestrian and cycle facilities and public lighting. This detail is also clarified in a Road Improvement Report prepared by CST Group detailing the extent of works to be undertaken and responsibility for delivery. These works should be read in conjunction with Drawing No. 118271-3002 from CST Group.

As previously detailed in Sections 2.3.3 & 2.3.4 of this report a footpath, cyclepath and public lighting is to be provided along the southern site boundary. A phasing drawing, Drawing No. 19-049-013, prepared by BDB Consulting illustrates how such infrastructure is to be delivered within Phase 1 of the development.

3.2 Proposed Materials & Finishes

The Architectural & Urban Design Statement provides details on the proposed materials and finishes to the scheme including specific detailing of finishes and the treatment of balconies in the apartment buildings and duplex units. Details relating to the landscaped areas, pathways, entrances and boundary treatments are provided on the Landscaping Masterplan Drawing No. 050318_LP_01 prepared by Austen Associates.

The treatment / screening of access areas to exposed areas of basement ramps to apartment blocks as well as the treatment of the ground floor and interface with the public realm are detailed in the photomontages and in the Landscaping Masterplan. High quality and sustainable finishes have been provided which seek to create a distinctive character for the development.

A Building Life-cycle report prepared by Healy Partners Architects sets out proposals for the long term management and maintenance of the proposed development.

3.3 Photomontages / CGI's

The photomontages / CGI's are included within the Architectural Design Statement prepared by ealy Partner Architects. In particular three distant views of the development are included as requested by the Board: to include when viewed:

- east and west along the R445;
- from the access road to the Technology Park; and
- from Castletroy College Road.

3.4 Lifecycle Report

Section 6.13 of the Apartment Guidelines requires that apartment applications: *“shall include a building lifecycle report, which in turn includes an assessment of long term running and maintenance costs as they would apply on a per residential unit basis at the time of application” and to “demonstrate what measures have been specifically considered by the proposer to effectively manage and reduce costs for the benefit of residents.”*

A Building Life Cycle Report has been prepared by Healy Partner Architects to address the requirements of Section 6.13 of the Apartment Guidelines. The report is broken into two sections as follows:

- An Assessment of Long Term Running Costs; and
- Measures to Reduce Costs

3.5 Residential Amenity – Daylight & Sunlight Analysis

A Daylight & Sunlight Analysis has been prepared to assess the residential amenity of existing residents of adjoining properties arising from the proposed development and the residential amenities of future occupants,

The report from Chris Shackleton Consulting confirms that the development generally complies with the recommendations and guidelines of Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice (BRE 2011) and BS 8206 Lighting for Buildings, Part 2: Code of Practice for Daylighting and other updated relevant documents. The report concludes that the project has successfully been designed to maximise the occupants' access to light. Room design in this project has been carefully considered. As such the design has used the guidelines in the spirit they have been written and balanced the requirements of this report with other design constraints to arrive at this design.

3.6 Schedule of Accommodation

A detailed schedule of accommodation indicating compliance with relevant standards in the Sustainable Housing Design Standards for New Apartments, Guidelines for Planning Authorities 2018 has been prepared by Healy Partners Architects.

3.7 Bicycle Spaces

The Site Layout Plan details the location of 3 no. covered bike shelters within the development proposal and as identified in blue in Figure 5.0 of this report. No bicycle parking is proposed within the basement car park area. Instead provision has been made for internal bicycle storage within the apartment blocks including 27 no. bicycle spaces in Block A and 39 no. spaces in Block B.

A total of 120 no. bicycle spaces can be accommodated on site. In addition to the bicycle parking within the apartment blocks, provision has been made for 54 no. bicycle spaces within the three external covered areas.

3.8 Traffic & Transport Assessment & Road Safety Audit

A Traffic & Transport Assessment (TTA) and Road Safety Audit (RSA) has been prepared by CST Group and accompanies the planning application.

3.9 DMURS

A DMURS Compliance Report has been prepared by CST Group demonstrating specific compliance with the requirements set out in the Design Manual for Urban Roads and Streets.

3.10 Open Space Provision

The Architectural / Urban Design Statement under Section 3. 'Inclusivity and Variety' details the extent of public, private and semi-private open space provided within the development. It is not proposed that any element of the development be taken in charge. Instead a Management Company will be established in accordance with the requirements of the Multi-Unit Developments Act 2011.

3.11 Sustainable Urban Drainage Systems

The Planning Application Services Report prepared by BDB Consulting sets out a Stormwater Management Plan in Section 6.0 of that report including proposals for the implementation of SUDS.

3.12 Phasing Plan

A phasing plan has been prepared and is detailed within both the Architectural/Urban Design Statement and on Drawing No.19-049-013 prepared by BDB Consulting. The phasing plan clearly sets out the extent of infrastructure delivery in Phase 1 and the open space delivery in Phase 1 & 2.

In terms of Part V there is agreement in principle to accommodate 14 no. social units on site with 4 no. units delivered in Phase 1, 9 no. units delivered in Phase 2 and 1 no. unit delivered in Phase 3. These provisions are detailed within the Part V report prepared by Linesight.

3.13 Landscaping Proposals

A Landscaping Masterplan Drawing No. 050318_LP_01 has been prepared by Austen Associates. including detail of tree planting, quantity, type and location of all proposed hard and soft landscaping.

The attenuation tank is located close to the northern boundary of the site as it must be located in proximity to the outfall. The location of the attenuation tank has resulted in the necessity to remove two trees on the northern site boundary, namely tree no's.0765 and 0766. These are Category C trees and are deemed to be of low quality. It is proposed to retain the remaining 6 no. trees along the northern site boundary. Whilst tree no. 0756 is the only Category A tree within this group, retention of the remaining 5 no. other trees is important to act as a buffer to the Category A tree and afford it greater protection. Further it is the grouping / cluster of these trees that add to their significance.

3.14 Construction & Environmental Management Plan

A Construction & Environmental Management Plan (CEMP) has been prepared for the site by Healy Partner Architects including reference for the treatment and removal of Japanese Knotweed. An Invasive Species Management Plan has been prepared by NM Ecology to manage and treat patches of Japanese Knotweed and Giant Hogweed (restricted non-native plant species) within the boundary of the proposed development site.

3.15 Waste Management Plan

An Operational Waste Management Plan has been prepared for the site by Healy Partner Architects.

3.16 Archaeological Impact Assessment

An Archaeological Method Statement has been prepared by Aegis Archaeology which details the methods proposed for the full archaeological excavation of archaeological features found on site during archaeological testing undertaken by RedArc Consulting Ltd. This Method Statement should be read in conjunction with the initial Archaeological Assessment prepared by RedArc Consulting and the follow on test-trenching on the site.

3.17 Noise Report

A Noise Assessment was undertaken by AWN Consulting. This assessment includes a description of the receiving ambient noise climate in the vicinity of the subject site and an assessment of the potential noise and vibration impacts associated with the proposed development during both the short-term construction phase and the long-term operational phase on its surrounding environment.

An inward noise impact assessment has also been completed in accordance with the guidance contained in *The Professional Guidance on Planning & Noise* (ProPG) to determine the potential noise impact from environmental noise on the residential amenity of the development.

3.18 Bat Report

A Bat Report has been prepared by NM Ecology. The report provides the results of a bat survey of the proposed development site, and includes an assessment of potential impacts on roosting, feeding and commuting bats.

A mature ash tree on the northern boundary of the site is used as a day roost / satellite roost by a single common pipistrelle bat. The tree will be retained and incorporated into the new development, The report confirms that the proposed development site does not appear to be an important feeding area or commuting route for bats.

4.0 NOTICE TO CERTAIN PRESCRIBED BODIES

Pursuant to Article 285(5)(a) of the Planning and Development (Strategic Housing Development) Regulations 2017 the Opinion also requested that 7 no. bodies be informed in the event of making an application.

It can be confirmed that the following 7 no. bodies were issued a copy of the entire application. Prior contact was made by phone to each of the seven bodies to ascertain their individual requirements

and whether they wished to receive the application in electronic format or in hard copy. A letter was issued to the prescribed bodies on 27th March 2020 with a copy of the application as requested, including:

1. Transport Infrastructure Ireland
2. National Transport Authority
3. Minister for Culture, Heritage and the Gaeltacht
4. Heritage Council
5. An Taisce – The National Trust for Ireland
6. Irish Water
7. Limerick County Childcare Committee

A copy of the issued letters are attached to the planning application.

5.0 CONCLUSION

This document sets out how the issues outlined in the pre-application consultation opinion from An Bord Pleanála (ABP) in relation to the proposed residential development at Walkers Lane, Annacotty have been addressed in full by the applicant and design team prior to lodgement of the application to ABP.

The layout and design changes incorporated into the final scheme are considered to result in improvements to the overall development and ensure that a high-quality development will be provided consistent with all relevant national, regional and local planning policies and guidelines.

Overall the proposed development seeks to deliver a higher density development on an appropriately zoned residential site, in accordance with the principles of proper planning and sustainable development of the area.

