



COAKLEY O'NEILL
town planning

Statement of Response to Council Opinion

Large Scale Residential Development at
Caheranardrish, Mungret,
Co. Limerick

Prepared in March 2026 on behalf of
Homeland Projects Ltd.

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Document Control Sheet

Client	Homeland Projects Ltd
Project Title	Caheranardrish Large Scale Residential Development
Job No.	CON24128
Document Title	Statement of Response to Council Opinion
Number of Pages	19

Revision	Status	Date of Issue	Authored	Checked	Signed
1	Draft	6 th March 2026	RH	DC	
2	LRD	31 st March 2026	RH	DC	

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1.0 INTRODUCTION

Homeland Projects Ltd., intend to seek permission for the development of a new residential neighbourhood on lands at Caheranardrish, Mungret, Co. Limerick. The proposal takes the form of a Large Scale Residential Development (LRD) comprising of 182no. residential dwellings and a crèche with capacity to accommodate 70no. children.

Following the LRD Opinion meeting on the 6th November 2025, the Planning Authority issued their Opinion on the 4th December 2025, which stated that they were of the opinion that the documentation, submitted with the consultation request under section 32B of the Planning and Development Act 2000 (as amended), the proposed development required further consideration and amendment to constitute a reasonable basis on which to make an application for permission for the proposed LRD.

In light of this, under article 16A(7) of the Planning and Development Regulations 2001 (as amended), a number of items were identified by the Planning Authority which were to be addressed in the submission of the Large Scale Residential Development Application.

The items identified by the Planning Authority in the Opinion, and the applicant's response are set out in Section 2 of this report.

The following response to the items identified, which should be read in conjunction with the plans and particulars submitted with the planning application, has been prepared by the applicants' design team:

- Coakley O'Neill Town Planning Ltd.
- Dedy Gahan Architects
- OSL Butler Consulting Engineers
- Simon Ronan Landscape Architects
- DixonBrosnan Ecology
- Irish Archaeological Consultancy Ltd
- MHL Consulting Engineers
- Molloy Consulting Engineers

For clarity, the applicants' response to each of the items raised is set out in the order that they appear in the Planning Authority's LRD Opinion. A copy of the LRD Opinion is enclosed in Appendix 1.

Each item is outlined in italics, followed by the Applicants' response to same.

2.0 RESPONSE TO OPINION ITEMS

LRD Opinion Item 1: Site Layout

A redesign of the site layout plan will be required having regard to the revised archaeological buffer requirements and the requirement to reconsider the movements of pedestrians/cyclists/vehicles in the vicinity of the proposed creche.

Response

The site layout has been redesigned in order to accommodate the enlarged archaeological buffer zone along with the addressing the pedestrian and vehicular activity around the creche and shared pedestrian / cycle lane. Please refer to the Site Plan, drawing no. 25028/P/003 for further details on this.

LRD Opinion Item 2: Design and Layout

- a) Include for communal open space associated with the apartment block***
- b) Bike parking for the apartments should be internalised and the number increased so it is in line with Table DM 9***
- c) Details in relation to boundary treatments associated with the residential units***
- d) Ensure that all 3 bedroom and above have a utility space***

Response

- a) An area of communal open space has been designated within the courtyard directly adjacent to the apartment block. This area has been allocated on top of the public open space requirement. Please refer to the architectural design statement and HQA for further details on this.
- b) 52 no. bike spaces have been allocated within the footprint of the apartment block with adequate visitor spaces accommodated for with both covered and uncovered sheffield stands within close proximity of the apartment block. Please refer to drawing no. 25028/P/008 and the apartment block ground floor plan, drawing no. 25028/P/900 for further details on this.
- c) The proposed internal boundary treatments are illustrated in Drawing L-102 Prepared by SRLA. The proposed treatments include 1.8m concrete post and timber panel infill fencing and 1.8m concrete rendered and capped walls in areas which front onto public open space.
- d) Unit types A2, B3, B4, and D3 have been revised to provide a utility space adjacent to the kitchen area. Please refer to the architectural design statement and the individual unit type drawings for further details on this.

LRD Opinion Item 3: Archaeology

There are concerns in relation to the proposed 10m buffer around the known archaeological monument and would request a buffer of between 25m. In light of same please submit the following in order for the Planning Authority to consider a buffer of 20m:

- (a) an Archaeological Impact Assessment***
- (b) details of the design on the edge of the buffer***
- (c) a comprehensive management plan for the recorded monument.***

Response

The concerns in relation the Archaeological buffer as proposed previously at 10m have been noted. Following engagement with the Limerick City and County Council Archaeologist a 20m buffer has been agreed and incorporated into the proposed development.

- a) An Archaeological Assessment has been prepared by Irish Archaeological Consultancy (IAC) and is enclosed with this planning application.
- b) In regard to the details of the buffer, no formal edge treatment is proposed at the boundary of the buffer. This approach is intentional and reflects the sensitivity of the archaeological setting. The buffer edge is defined by retained existing landscape features, including the existing hedgerow and areas of established scrub vegetation, which remain unchanged. No fencing, hard landscaping, excavation, or ornamental planting is proposed at the buffer boundary.

The existing scrub is retained throughout, and the archaeological site itself is preserved as existing. Areas immediately outside the retained scrub have been supplemented with meadow planting, which is designed to provide a soft, informal transition rather than a defined or engineered edge. This low-intervention approach reinforces the existing landscape character, enhances biodiversity, and ensures minimal visual and physical impact on the archaeological monument.

These measures ensure the buffer functions as a passive, protective landscape zone appropriate to the archaeological sensitivity of the site. Please refer to Drawings L-100, L-102 and L-500 prepared by SRLA.

- c) A comprehensive management plan has been incorporated in the Archaeological Assessment has been prepared by Irish Archaeological Consultancy (IAC) and is enclosed with this planning application.

LRD Opinion Item 4: Ecology

- a) The AA Screening and NIS should take into account the fact that the site is within an area of extreme groundwater vulnerability.***
- b) An Ecological Impact Assessment should be carried out and should include consideration of bats, badgers, reptiles, amphibians and FPO species***
- c) The foraging walk should include clear signage showing species that can be harvested or picked.***

The concern here would be the inadvertent harvesting or removal of species of ecological concern should they colonise post construction.

- d) The development should include the use of swift bricks and nest boxes.***
- e) The applicant should avoid the use of net gain terminology unless it can be demonstrated definitively that this is to come about as a result of the proposal. If net gain is promised in the application and then not demonstrated by a suitably qualified and experienced ecologist, this would amount to a weakness in the application.***
- f) Native colonisation and minimal management in selected areas would be welcome along with the inclusion of reptile/amphibian hibernacula.***
- g) The application should be accompanied by an EIA Screening report to include Schedule 7A information.***

Response

- a) A Natura Impact Statement has been prepared by Dixon Brosnan Environmental Consultants and accompanies this application. The NIS has considered throughout the potential impacts of the development during construction and operation on groundwater.

Additionally, a Hydrological and Hydrogeological Assessment has been prepared by IE Consulting to assess the risk that activities associated with the proposed development, during construction and operation might impact the nearby proposed Natural Heritage Area (pNHA) of Loughmore Turlough. The findings of this assessment have been assessed as part of the NIS.

This NIS has examined and analysed, in light of the best scientific knowledge, with respect to Lower River Shannon SAC and River Shannon and River Fergus Estuaries SPA within the potential likely zone of impact of the proposed development, the potential effect pathways, how these could impact on qualifying species and habitats and whether the predicted effects would adversely affect the integrity of these European sites.

The NIS objectively concluded the proposed development will not adversely affect (either directly or indirectly) the integrity of any European site, either alone or in combination with other plans or projects. There is no reasonable scientific doubt in relation to this conclusion.

- b) An Ecological Impact Assessment has been prepared by Dixon Brosnan Environmental Consultants which has considered impacts on bats, badgers, reptiles, amphibians and FPO species.

In addition to this, the landscape proposals have been developed in coordination with the findings and recommendations of the Ecological Impact Assessment. All relevant ecological constraints, protection measures and habitat retention requirements have been incorporated into the landscape design.

These measures are reflected within the submitted landscape drawings, including the retention of existing vegetation where required, avoidance of sensitive areas, and the provision of appropriate planting proposals in accordance with the ecologist's recommendations.

In addition, species-specific mitigation measures have been incorporated into the design, including the provision and identified locations for bird boxes, bee boxes, bat boxes, insect hotels, hedgehog domes, amphibian hibernacula and log piles. Please refer to Drawings L-100, and L-500 Series Plans as well as the Ecological Connectivity & Species Mitigation, pages 14 – 15 of Landscape and Green Infrastructure Report prepared by SRLA.

- c) Noted, the foraging walk has been removed from the revised landscape proposals and is no longer part of the scheme.
- d) An adequate number of swift bricks and nest boxes have been incorporated into the elevation of the apartment block on the site. Please refer to the apartment block drawings prepared by Deady Gahan Architects for further details in relation to this.
- e) Noted, the drawing has been updated and is now titled "Biodiversity Enhancement Strategy" to more accurately reflect its purpose.

The drawing illustrates the retention of existing hedgerows and trees, together with proposed meadow and tree planting, as part of the overall site design. It is intended to demonstrate the location and extent of biodiversity enhancement measures, rather than to quantify or evidence ecological net gain.

Any assessment, demonstration or verification of ecological net gain, where applicable, is addressed separately within the Ecological Impact Assessment and supporting reports prepared by a suitably qualified ecologist.

- f) Species-specific mitigation measures have been incorporated into the design, including the provision and identified locations for bird boxes, bee boxes, bat boxes, insect hotels, hedgehog domes, amphibian hibernacula and log piles. Please refer to Drawings L-100, and L-500 Series Plans as well as the Ecological Connectivity & Species Mitigation, pages 14 – 15 of Landscape and Green Infrastructure Report prepared by SRLA.
- g) An EIA Screening Report has been prepared by Coakley O'Neill Town Planning which is enclosed with this application. The report concludes that EIA is screened out.

LRD Opinion Item 5: Active Travel

- a) The parallel parking along the new cycle lane is at the same level at this cycle lane, a buffer is required or change in levels in the interests of safety for vulnerable road users.***
- b) The drop off facilities serving the creche should be re examined. There is no buffer/segregation adjacent to the creche drop off facilities and bike lane.***
- c) The Apartment guidelines promote the internalisation of bike parking to encourage investment in bikes and provide the most secure storage solution. Please address.***
- d) Some of the short stay bike storage solutions should be covered stands to promote the use of bikes for short trips.***

- e) The use of racking should only be part of bike storage solution, it is not suitable for all users. The external structures/sheds do not comply with the Cycle Design Manual in terms of cycling height and aisle width for adequate manoeuvrability. A mix of bike parking should be proposed.***

Response

- a) The parallel parking spaces have been removed from the cycle lane area to avoid any clashes with the cycle lane. Please refer to the Site Plan, drawing no. 25028/P/003 for further details on this.
- b) The drop-off facilities for the creche have been relocated to avoid any clashes with the cycle lane. Please refer to the Site Plan, drawing no. 25028/P/003 for further details on this.
- c) 52 no. bike spaces have been allocated within the footprint of the apartment block with adequate visitor spaces accommodated for with both covered and uncovered sheffield stands within close proximity of the apartment block. Please refer to drawing no. 25028/P/008 and the apartment block ground floor plan, drawing no. 25028/P/900 for further details on this.
- d) Covered sheffield stands have been introduced in some areas in place of uncovered stands to promote the use of bikes for short trips. Please refer to the typical bike store drawing no. 25028/P/011 for details and locations of these.
- e) Bike parking spaces have been proposed in the form of 2 tier bike racks and both covered and uncovered sheffield stands to provide a mix of different bike storage types. Please refer to the typical bike store drawing no. 25028/P/011 and the apartment block ground floor plan, drawing no. 25028/P/900 for further details and locations of these.

LRD Opinion Item 6: Roads

Please submit drawings and supporting documentation to include the following:

- ***A Stage 1 Road Safety Audit (RSA) has been submitted; however it does not appear that the drawings and supporting information have been updated in line with the accepted recommendations.***
 - ***Provide a Traffic & Transport Assessment (TTA) including the Master Plan and existing developments.***
 - ***The section of Road 008 shows a vertical gradient of 8% over approximately 10m. In addition the design also appears to show a dwell area of 5% at the tie-in point with Road 001 (Spine Road). A lack of an adequate dwell area could result in a vehicle inadvertently rolling onto the spine road when attempting to accept a gap in the road traffic. This could result in a side impact type collision.***
 - ***From a review of the drawings, it was observed that the parallel parking arrangements along the main spine road appears to be flush to cycle lane. The drawing submitted to, do not show any separation between the parking bays and 2-way cycle track. This parking arrangement could lead to conflict between vehicle car doors opening onto the***

cycle lane and lead to collisions with cyclists. Parents, guardians and children would have to cross the proposed 2-way cycle track

- *The road crossing of the cycle track is not in line with the "National Cycle Manual". Cyclists shall have priority.*
- *Revise the proposed Creche drop off area where children will have to cross the cycle track and car doors will open onto the cycle track.*
- *Revise the proposed 'Shared Surfaces' un line with "DMURS" they are shown as 4.8m plus a 1.5m buffer, this will result in increased speed.*
- *Several of the parking bays are shown too close to the junctions.*
- *Ensure driveways are minimum 6m long, max 10% gradient, with 25mm kerb upstand. Clearly show this on the Engineering Layouts, especially Road Signage & Markings Layouts.*
- *Demonstrate sightlines and forward visibility in line with DMURS.*
- *The proposed traffic calming tabletop ramps are not shown are constructed using colours other than the markings.*
- *Clearly show road and footpath widths on Engineering Layouts, especially Road Signage & Markings Layouts.*
- *Address footpath overhang at perpendicular parking (preferably by widening footpaths) again clearly show on Engineering Layouts, especially Road Signage & Markings Layouts.*
- *Provide house numbering signage: location, ornate design, dimensions, and mounting method.*
- *Provide advance ramp signage.*
- *Submit revised swept path analysis that shows that vehicles can pass by the refuse vehicle.*
- *Show spare ducting bank to be handed over to LCCC (per TII standards).*
- *Provide utility ducting layout for broadband (100mm uPVC, connected to each unit).*
- *Electric Vehicle (EV) Infrastructure:*
- *Minimum 20% of parking spaces to have functioning EV chargers.*
- *Remaining spaces to be ducted for future EV installation.*
- *Accessible and EV bays must not use permeable paving (due to painting requirements).*
- *Additional Requirements:*
 - *Footpath is required around the public realm spaces.*
 - *Include footpaths around EV spaces.*
 - *Revise road cross section: surface course to be 40mm of 10mm SMA Surf.*
 - *Submit a cross section of the footpaths at driveways. This shall have concrete depth of 150mm with reinforcing mesh.*
 - *If the T-Junction tabletop ramps are at the same level as the footpaths tramline (corduroy) tactile paving is require warning and direct VRU's.*

Response

- A Stage 1 Road Safety Audit has been prepared by MHL Consulting Engineers. All recommendations of the Road Safety Audit have been accepted and incorporated into the proposed site layout;
- A Traffic and Transportation Assessment has been prepared by MHL Consulting Engineers and accompanies this planning application. The TTA concludes basis on comparison of traffic modelling, the development will not have a significant negative impact on the operation of the junction assessed from a capacity point-of-view.
- Please refer to the OSL Butler Roads Layout, 24051-OSL-11-DR-C-1110, and Roads Longitudinal Sections, 24051-OSL-11-DR-C-1111 to 1114. Road 8 is largely located on/over the existing GNI buffer zone. The current levels across this buffer zone are not allowed to be reduced. Due to the existing topography in this location, it is necessary to include for a short section that is steeper to ensure an appropriate link to levels above and below, sufficient depth of cover over services including sufficient separation distances between the existing GNI infrastructure and those services proposed. The junction between Road 7 and 8 has been revised to establish Road 8 priority and allow for a suitable dwell area for vehicles approaching from Road 7. In addition to this, the dwell area for vehicles approaching the main spine road, Road 1, from Road 8 has also been revised to provide a more suitable grade and dwell area.
- The Site Layout has been amended to ensure that no conflict occurs between parking bays and the proposed cycle lane. This is illustrated in the Proposed Site Layout Plan Drawing No. 25028/P/003 prepared by Deady Gahan Architects.
- Please refer to the OSL Butler Roads Layout 24051-OSL-11-DR-C-1110, and Roadmarkings and Signage Layout, 24051-OSL-11-DR-C-1115. The Cycle track road crossings have been provided in line with the National Cycle Manual (NCM), more specifically NCM Detail Drawing TL408 Two-Way Cycle Track Crossing Side Road with Priority - Partial Set Back. Where the cycle track crosses the roads, these have been identified on the drawings and The Two-Way Cycle Track is proposed as a raised facility, raised to be separated from vehicular traffic by a full height kerb. In line with the NCM, the cycle track is also segregated from the adjacent footpath by 60mm. At junctions/road crossings, the road is raised in line with the details provided on the OSL Butler Road Details Sheets, 24051-OSL-90-DR-C-9010 and 9011, and footpath and cycle track suitable graded/ramped down to meet the raised road level. This will ensure that cyclists have priority whilst remaining at the same level as they cross the side road. The cycle track surface is proposed as a red coloured surface, in line with Section 4.2.2.1 of the NCM.
- The Site Layout has been amended to ensure that no conflict occurs between the creche drop off and the proposed cycle lane. This is illustrated in the Proposed Site Layout Plan Drawing No. 25028/P/003 prepared by Deady Gahan Architects.
- Please refer to the OSL Butler Roads Layout 24051-OSL-11-DR-C-1110. Horizontal deflection areas have now been included on Shared Surface Roads to ensure vehicular speeds are suitably reduced.
- Please refer to the Stage 1 Road Safety Audit where issues and concerns were raised by the auditor. These issues and concerns have been address in full in the layouts and reports submitted as part of this planning application.

- Please refer to the OSL Butler Roads Layout 24051-OSL-11-DR-C-1110. Roads, and relevant features, are dimensioned on this layout. Driveways are minimum 6m long with max gradient of 10%. Please refer to the OSL Butler Roads Kerb Layout 24051-OSL-11-DR-C-1118 where relevant kerb reveal heights are shown for the entire development. 25mm Kerb upstands have been provided for driveways.
- Please refer to OSL Butler Swept Path Analysis Sheets, 24051-OSL-11-DR-C-1116 and 1117. Sightlines and Forward Visibility in line with DMURS are shown on these layouts.
- Noted. It is important to note that in reviewing these layouts, the Drawing Legend should be utilised as intended. The legend describes to the reader what each colour hatch and/or line type represents. Please refer to the OSL Butler Roads Layout, 24051-OSL-11-DR-C-1110, where the table top ramps and raised junctions have been represented in RGB colour (127, 31, 0), Dark Maroon, and specified as being in asphalt, black.
- Please refer to the OSL Butler Roads Layout 24051-OSL-11-DR-C-1110. Roads, and relevant features including footpaths, are dimensioned on this layout.
- Please refer to the OSL Butler Roads Layout 24051-OSL-11-DR-C-1110. Roads, and relevant features including footpaths, are dimensioned on this layout. Footpaths at perpendicular parking bays have been increased in width (2.5m) to address footpath overhang.
- Please refer to OSL Butler Road marking and Signage Layout, 24051-OSL-11-DR-C-1115. Advance ramp signage has now been provided on the main spine road.
- Please refer to OSL Butler Swept Path Analysis Sheets, 24051-OSL-11-DR-C-1116 and 1117. The layout shows the swept analysis done for fire tenders and refuse vehicles and includes all bends.

The Design Manual for Urban Roads and Streets (DMURS). provides clear guidance regarding the accommodation of larger vehicles (such as refuse trucks or fire tenders) on roads where their presence is infrequent.

The key points include:

- a) Reduced Road Widths and Kerb Radii - For streets not regularly used by large vehicles, road widths and kerb radii may be reduced. This encourages slower speeds and improves pedestrian safety and comfort, supporting the overall goal of creating more people-friendly urban environments.
- b) Swept Path Flexibility - Where larger vehicles are not expected to use a road regularly, it is acceptable under DMURS for them to encroach slightly into the opposite lane or overrun pedestrian areas (e.g., mountable kerbs or reinforced verges) when turning or maneuvering, as long as it does not present a significant safety risk.
- c) Design Approach - DMURS promotes a context-sensitive and balanced approach to street design. Rather than over-designing for infrequent vehicle movements, the manual encourages designers to prioritize the needs of pedestrians and cyclists, especially in residential or low-speed environments.
- d) Turn Movements and Lane Crossings - The manual explicitly states that in low-traffic or residential areas, some minor encroachment into the oncoming lane for large vehicle turning movements is permissible, provided that this occurs at low speeds

and in predictable locations (e.g., junctions) and does not compromise overall safety.

- e) Based on the DMURS (Design Manual for Urban Roads and Streets), the guidance on accommodating infrequent use by large vehicles—such as reduced road widths, tighter kerb radii, and acceptable short encroachment into opposing lanes—is addressed in several specific clauses and sections:
- Kerb Radii and Turning Movements, Section 4.4.3 – Junction Design (pg. 96)
 - The use of tighter corner radii (4–6m) is generally desirable as it reduces pedestrian crossing distance and encourages slower vehicle speeds. Larger radii (up to 9m) may be considered where there is a requirement to accommodate larger service or emergency vehicles.
 - This indicates that tighter radii are preferred and only increased if there's regular need for large vehicle turning—implying that infrequent use does not justify larger radii.
 - Swept Path and Occasional Encroachment, Section 3.3.2 – Design Vehicles (pg. 52)
 - Swept path analysis should be used to ensure that larger vehicles can negotiate tight turns where necessary. In certain cases, where large vehicles will only infrequently use a particular route, some encroachment into the opposing lane may be considered acceptable.
 - This explicitly supports occasional lane encroachment when large vehicles use the route infrequently.
 - Flexible Approach to Street Design, Section 3.3.3 – Movement and Place Context (pg. 53)
 - The need to accommodate large vehicles should not lead to the over-design of streets. A balanced approach is required, which may include solutions such as overrun areas, shared spaces, or controlled access points.
 - Road Width Design Philosophy, Section 4.4.1 – Corner Radii and Junction Geometry (pg. 94)
 - Over-designing junctions to accommodate large vehicles can significantly compromise pedestrian safety and comfort... It is preferable to adopt tighter geometry and allow occasional encroachment or to use overrun areas where necessary.
 - Reinforces that streets shouldn't be over-designed for infrequent large vehicle access—favouring pedestrian-friendly geometry instead.

In summary, DMURS supports designing narrower, safer streets even where occasional large vehicle access is required, and provides for controlled, low-speed encroachment into opposing lanes or onto verge areas as a practical solution. The road design as proposed has been designed in accordance with the relevant and current guidance documents, including the Design Manual for Urban Roads and Streets (DMURS)"

- We confirm that provision will be made to accommodate a spare bank of ducts to be handed over to Limerick City and County Council upon taking in charge of any phase of the development. Applications

have been made to the relevant utility providers (ESB, Eir). The applicant is currently waiting on these providers to provide proposed layouts for this proposed development. We can confirm that upon receiving these layouts, a site layout plan for utility ducting and manholes for broadband services etc., including a spare bank of ducts, to be handed over to Limerick City and County Council upon taking in charge of any phase of the development, will be submitted to Limerick City and County Council for agreement.

- We confirm that provision will be made to accommodate broadband ducting for dwellings in line with the relevant regulations.
- 20% of the communal parking spaces have been allocated as EV. Spaces (4 no. spaces). 1 no. E.V. space has also been provided for the creche parking area. Please refer to drawing no. 25028/P/008 for further details and locations of these.
- All remaining communal parking spaces have been ducted for future EV installation. All in curtilage car spaces are provided with ducting for future EV installation.
- Noted, please refer to OSLButler Road Details 24051-OSL-90-DR-C-9010 and 9011. The surface course specification has now been revised accordingly.
- Please refer to OSLButler Road Details 24051-OSL-90-DR-C-9010 and 9011. A standard note is included on footpath details to call up the thickened (150mm) footpath with reinforcing at driveways and shared surface/homezone footpath/buffer zone areas where traffic/vehicle loading is possible. We have also included an additional standalone detail now to the forementioned details that shows cross section with thickened footpath.
- Please refer to OSLButler Proposed Roads Details, 24051-OSL-90-DR-C-9010 and 9011. The typical details associated with the raised junctions show the level differences between the typical road vertical profile and the raised junction vertical profile. The difference in vertical profile is 75mm. There is still a level difference between the adjacent footpaths and the raised junction finished level of 75mm, for a full height roadside kerb at 150mm high. Tactile paving has been provided as and if required in accordance with DMURS and the 'Guidance on the Use of Tactile Paving Surfaces' issued by the UK Department of Transport 2021."

LRD Opinion item 7: Mobility Management Plan

A Mobility Management Plan document in line with Objective TR023 of the Limerick Development Plan 202-2028 is required. The MMP should be presented as a separate document in the LRD application. The MMP should include modal split targets for walking, cycling and car share targets in accordance with the NTA's Achieving Effective Workplace Travel Plans 3.2.2. The name of the WTP coordinator should be submitted along with a package of measures / targets to support slower modes including bike and car hire options.

Response

A Mobility Management Plan has been prepared by MHL & Associates Ltd and accompanies this planning application.

It concludes that the subject site is well situated for the implementation of a Mobility Management Plan promoting alternative modes of transport especially when accessing local services such as the local schools, Place of employment within Limerick City, University Hospital Limerick, parks, and playgrounds.

LRD Opinion item 8: Landscaping/Boundaries/Public Open Space

The applicant is requested to provide the following:

- a) Tree survey drawing***
- b) Tree protection plan in accordance with BS5837:2012 including location of tree protection fencing***
- c) The Planning Authority notes concerns that the proposed open space provision falls short of the required 15%. Accordingly, the applicant is requested to submit a revised Site Layout Plan indicating the dimensions and areas of all designated open space. Please note that the archaeological monument including buffer should not be included in the open space calculations.***
- d) Please reduce the amount of Birch Trees along streets to future proof in case of disease.***

Note:

- Plan/exercise equipment requirements are not in compliance with the Limerick Development Plan. Equipment for all age groups including formal and natural play are to be provided. A small park as per Table DM 2 of the Limerick Development Plan is required.***
- Provide schedule of all proposed play and exercise equipment types and numbers***
- Provide a buffer to car parking to reduce conflict potential***
- Some tree planting in narrow verges appears unrealistic. Please clarify on construction detail used for those instances.***
- The northern verge along the access road shall be widened to increase distance of trees to road and give more sustainable growing conditions.***

Response

- a) A Tree Survey have been undertaken by Green Tree Arborists which is enclosed in this planning application.
- b) A Tree Protection Plan has been prepared by the project arboricultural consultant in accordance with BS5837:2012.

The landscape drawings reference the approved arboricultural information and illustrate the relationship between the proposed landscape works and the tree protection fencing and Root Protection Areas (RPAs) identified within the Tree Protection Plan. No landscape works are proposed within the protected areas, except where explicitly permitted by the arboricultural recommendations. The location of tree protection fencing is clearly shown on the Tree Protection Plan and is coordinated with the landscape proposal.

Please refer to Drawing L-101 prepared by SRLA.

- c) 15% of the developable area of the site has been allocated as public open space. This area excludes the archaeological feature and buffer zone which acts as an additional feature to the public realm.

The Open Space Quantum is illustrated on pages 21 of Landscape and Green Infrastructure Report prepared by SRLA.

LRD Opinion item 9: Lighting Arrangements

Please submit a lighting design fully in line with Limerick City and County Council's Public Lighting Specification and shall include the following.

- ***Must show lux levels.***
- ***Submit warranties.***

Response

A lighting design in line with the Limerick City and County Council's Public Lighting Specification has been prepared by Molloy Consulting Engineers and accompanies this application.

The applicant will endeavour to submit the 10 year parts and labour warranty as per Limerick City and County Council Public Lighting and Product Specification 2022 at detailed design stage, subsequent to receiving a grant of planning

LRD Opinion item 10: Surface Water and SuDs Management Plan

a) Please submit a redesign solution that adequately addresses surface water management. The current approach, which relies on discharging to the existing LIHAF soakaway, is unacceptable as this soakaway was a temporary measure and is not sized for the proposed development flow.

The pumped solution originated from a request by Central Services to act solely as an overflow system. While this will provide contingency in the event of infiltration failure, it is acknowledged and accepted that such a system could lead to long-term maintenance costs for the local authority when the estate is taken in charge.

b) Please submit revised drawings and supporting documentation demonstrating compliance with Limerick City and County Council's Surface Water & SuDS Specification. The submission should include:

- ***Accessible and EV bays must not use permeable paving (due to painting requirements).***
- ***Details of the storm water pumping station are required and must be to Uisce Eireann standards.***
- ***The location of the proposed SW Rising Main is not in line with Uisce Eireann Standards.***
- ***Consider an alternative to detention basin or redesign that level of surface water it***

potentially holds is reduced in depth.

- ***Submit a cross section of the proposed green blue roof with construction buildup with clear specifications and with overflow systems.***
- ***Show the public realm permeable paving connected with access chambers for maintenance and with overflow system to the main internal surface water pipeline.***
- ***Improve clarity of the layout plans—vent stacks and alarm/messaging units for interceptors are difficult to locate.***
- ***Confirm that permeable paving driveways are designed as sealed systems.***
- ***Include raised SuDS planters for each unit.***
- ***Submit a Stage 1 Storm Water Audit.***
- ***A revised Engineering Services Report is required to include section for the surface water pumping station and for the surface water rising main. Include for hydraulic modelling shall be submitted for the design of the pipes at a 1/5-year return period.***

Response

- (a) Please refer to OSLButler Surface Water Design Report, 24051-OSL-OSL-RP-C-0011 and the Surface Water Layout, 24051-OSL-11-DR-C-1120. The surface water rising main outfall has been revised to now discharge to the existing surface water network within the LIHAF Road. The surface water network and management of surface water within the development has been explained and elaborated on within the aforementioned reports. This complies with the requirements as set out by LCCC Central Services as well as the LCCC Roads and Drainage Departments.
- (b) In regards to the compliance with Limerick City and County Council's Surface Water & SuDS Specification, please refer to the below:
- Please refer to OSLButler Surface Water Layout, 24051-OSL-11-DR-C-1120. Accessible and EV bays have now been revised to address this requirement.
 - Please refer to OSLButler Surface Water Design Report, 24051-OSL-OSL-RP-C-0011. The proposed details of the surface water pump station have been included in the aforementioned report, including the Appendices. These details are typical and will be further evolved at detailed design stage upon receiving a successful grant of planning.
 - We confirm that the location of the surface water rising main is in line with the Uisce Eireann Code of Practice.
 - Please refer to OSLButler Surface Water Design Report, 24051-OSL-OSL-RP-C-0011. The introduction of detention basins (Nature-based Solutions) are in line with the CIRIA C753 (The SuDS Manual) and aligns with National Strategy and Guidance as set out within the 'Implementation of Urban Nature-based Solutions Guidance Document for Planners, Developers and Developer Agents (November 2024)'.

In summary, in the context of surface water management for the development, these basins will be useable space (dry, sunken lawns) and predominantly drains the adjacent open space areas. In the event of infiltration failure of the attenuation tanks located below these basins, these basins will act as a first warning mechanism for the local authority and residents (sign of

water build up) that would trigger reason for further inspection of the surface water network below.

CIRIA C753 (The SuDS Manual) Table 24.6 notes that drainage by basins, wetlands and ponds can be considered to provide interception. We confirm that the design has been undertaken with due regard to safety and risk mitigation, in accordance with the principles and best practices set out in the CIRIA SuDS Manual (C753). The design incorporates features that align with the guidance outlined in Section 36.5 of the manual, which emphasizes the importance of shallow side slopes (not steeper than 1 in 3), appropriate landscaping, controlled access where necessary, and clear visibility to deter unsafe behaviour. These measures ensure the detention basins are safe for all users while still fulfilling their function in surface water management.

- Please refer to OSLButler Surface Water Design Report, 24051-OSL-OSL-RP-C-0011. A cross section of the proposed green roof construction build up with clear specification and overflow systems have been included in this report.
- Please refer to OSLButler Surface Water Layout 24051-OSL-11-DR-C-1120. The public realm permeable paving have now been revised to include a connection with access chambers for maintenance and overflow system.
- Please refer to OSLButler Surface Water Layout 24051-OSL-11-DR-C-1120. Locations of Vent Stacks and alarm/messaging units for interceptors are shown on the aforementioned layout including appropriate symbol and reference in the drawing legend.
- Please refer to OSLButler Surface Water Layout 24051-OSL-11-DR-C-1120, including the Roads Details, 24051-OSL-90-DR-C-9010 and 9011, and Surface Water Details 24051-OSL-90-DR-C-9020 to 9025. Permeable paving driveways are designed as sealed systems.
- Please refer to OSLButler Surface Water Layout 24051-OSL-11-DR-C-1120, raised planters have now been included for each unit.
- Please refer to the Stage 1 SWA report by JBA Consulting included under separate cover.
- Please refer to OSLButler Surface Water Design Report, 24051-OSL-OSL-RP-C-0011. The aforementioned report focusses on the surface water design and the hydraulic modelling for the design op pipes at a 1/5 year return period is included in the Appendices of the aforementioned report.

LRD Opinion item 11: Part V

The applicant is to provide information in respect of the Approved Housing Body that is proposed. Alternatively, the applicant should propose alternative units dispersed throughout the development.

Response

The Applicant has engaged with Co-Operative Housing Ireland in respect to the Part V Units of the proposed development. A letter of intent from Co-Operative Housing Ireland is enclosed in Appendix 3 of the Part V Proposal which accompanies this submission.

LRD Opinion item 12: Taken in Charge

Please submit a site layout plan indicating the areas to be taken in charge by Limerick City and County Council. The plan should also reflect areas to be managed by a Management Company.

Response

A Taking in Charge Plan has been prepared by Deady Gahan Architects. Please refer to Drawing No. 25028/P/010.

LRD Opinion item 13: Letters of Consent

- a) Provide written confirmation of a pre-connection agreement with Uisce Éireann for the proposed development of 180 units + creche prior to commencement of works. In the absence of such confirmation, evidence shall be provided demonstrating that an application for a pre-connection agreement has been lodged with Uisce Éireann.***
- b) Confirm that discussions have been held with Gas Networks Ireland***
- c) Confirm that discussions have been held with the utility provider in relation to the overhead powerlines.***

Response

- a) Please refer to OSLButler Engineering Services Report, 24051-OSL-00-RP-C-0001. The Pre-connection confirmation of feasibility has been included within Appendix B of this report.
- b) We can confirm that discussions have been held with Gas Networks Ireland (Darren Wallace, Senior Pipeline Safety Engineer, and Dana Wolkiewicz, Pipeline Protection Engineer) including Brendan Creedon from IPEC in relation to the proposed development.
- c) We can confirm that discussions have been held with ESB in relation to the overhead powerlines.

APPENDIX 1: COPY OF LIMERICK CITY AND COUNTY COUNCIL LRD OPINION

4th December 2025

Rory Hanrahan

Coakley O'Neill Town Planning Ltd

NSC Campus

Mahon

Cork

By E-mail: rory@coakleyoneill.ie

LRD PRE-PLANNING REF: 1048948

LOCATION: Caheranardrish, Mungret, Co. Limerick

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

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

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

1. Site Layout

A redesign of the site layout plan will be required having regard to the revised archaeological buffer requirements and the requirement to reconsider the movements of pedestrians/cyclists/vehicles in the vicinity of the proposed creche.

2. Design and Layout

- (a) Include for communal open space associated with the apartment block
- (b) Bike parking for the apartments should be internalised and the number increased so it is in line with Table DM 9
- (c) Details in relation to boundary treatments associated with the residential units
- (d) Ensure that all 3 bedroom and above have a utility space

3. Archaeology

There are concerns in relation to the proposed 10m buffer around the known archaeological monument and would request a buffer of between 25m. In light of same please submit the following in order for the Planning Authority to consider a buffer of 20m:

- (a) an Archaeological Impact Assessment
- (b) details of the design on the edge of the buffer
- (c) a comprehensive management plan for the recorded monument.

4. Ecology

- a) The AA Screening and NIS should take into account the fact that the site is within an area of extreme groundwater vulnerability.
- b) An Ecological Impact Assessment should be carried out and should include consideration of bats, badgers, reptiles, amphibians and FPO species
- c) The foraging walk should include clear signage showing species that can be harvested or picked. The concern here would be the inadvertent harvesting or removal of species of ecological concern should they colonise post construction.
- d) The development should include the use of swift bricks and nest boxes.
- e) The applicant should avoid the use of net gain terminology unless it can be demonstrated definitively that this is to come about as a result of the proposal. If net gain is promised in the application and then not demonstrated by a suitably qualified and experienced ecologist, this would amount to a weakness in the application.
- f) Native colonisation and minimal management in selected areas would be welcome along with the inclusion of reptile/amphibian hibernacula.
- g) The application should be accompanied by an EIA Screening report to include Schedule 7A information.

5. Active Travel

- (a) The parallel parking along the new cycle lane is at the same level at this cycle lane, a buffer is required or change in levels in the interests of safety for vulnerable road users.
- (b) The drop off facilities serving the creche should be re examined. There is no buffer/segregation adjacent to the creche drop off facilities and bike lane.
- (c) The Apartment guidelines promote the internalisation of bike parking to encourage investment in bikes and provide the most secure storage solution. Please address.

(d) Some of the short stay bike storage solutions should be covered stands to promote the use of bikes for short trips.

(e) The use of racking should only be part of bike storage solution, it is not suitable for all users. The external structures/sheds do not comply with the Cycle Design Manual in terms of cycling height and aisle width for adequate manoeuvrability. A mix of bike parking should be proposed.

6. Roads

(a) Please submit drawings and supporting documentation to include the following:

- A Stage 1 Road Safety Audit (RSA) has been submitted; however it does not appear that the drawings and supporting information have been updated in line with the accepted recommendations.
- Provide a Traffic & Transport Assessment (TTA) including the Master Plan and existing developments.
- The section of Road 008 shows a vertical gradient of 8% over approximately 10m. In addition the design also appears to show a dwell area of 5% at the tie-in point with Road 001 (Spine Road). A lack of an adequate dwell area could result in a vehicle inadvertently rolling onto the spine road when attempting to accept a gap in the road traffic. This could result in a side impact type collision.
- From a review of the drawings, it was observed that the parallel parking arrangements along the main spine road appears to be flush to cycle lane. The drawing submitted to, do not show any separation between the parking bays and 2-way cycle track. This parking arrangement could lead to conflict between vehicle car doors opening onto the cycle lane and lead to collisions with cyclists. Parents, guardians and children would have to cross the proposed 2-way cycle track
- The road crossing of the cycle track is not in line with the “National Cycle Manual”. Cyclists shall have priority.
- Revise the proposed Creche drop off area where children will have to cross the cycle track and car doors will open onto the cycle track.
- Revise the proposed ‘Shared Surfaces’ in line with “DMURS” they are shown as 4.8m plus a 1.5m buffer, this will result in increased speed.
- Several of the parking bays are shown too close to the junctions.
- Ensure driveways are minimum 6m long, max 10% gradient, with 25mm kerb upstand. Clearly show this on the Engineering Layouts, especially Road Signage & Markings Layouts.
- Demonstrate sightlines and forward visibility in line with DMURS.
- The proposed traffic calming tabletop ramps are not shown are constructed using colours other than the markings.
- Clearly show road and footpath widths on Engineering Layouts, especially Road Signage & Markings Layouts.
- Address footpath overhang at perpendicular parking (preferably by widening footpaths) again clearly show on Engineering Layouts, especially Road Signage & Markings Layouts.
- Provide house numbering signage: location, ornate design, dimensions, and mounting method.
- Provide advance ramp signage.
- Submit revised swept path analysis that shows that vehicles can pass by the refuse vehicle.

- Show spare ducting bank to be handed over to LCCC (per TII standards).
- Provide utility ducting layout for broadband (100mm uPVC, connected to each unit).

Electric Vehicle (EV) Infrastructure:

Minimum 20% of parking spaces to have functioning EV chargers.

Remaining spaces to be ducted for future EV installation.

- Accessible and EV bays must not use permeable paving (due to painting requirements).

Additional Requirements:

- Footpath is required around the public realm spaces.
- Include footpaths around EV spaces.
- Revise road cross section: surface course to be 40mm of 10mm SMA Surf.
- Submit a cross section of the footpaths at driveways. This shall have concrete depth of 150mm with reinforcing mesh.
- If the T-Junction tabletop ramps are at the same level as the footpaths tramline (corduroy) tactile paving is required warning and direct VRU's.

7. Mobility Management Plan

A Mobility Management Plan document in line with Objective TR023 of the Limerick Development Plan 202-2028 is required. The MMP should be presented as a separate document in the LRD application. The MMP should include modal split targets for walking, cycling and car share targets in accordance with the NTA's Achieving Effective Workplace Travel Plans 3.2.2. The name of the WTP coordinator should be submitted along with a package of measures / targets to support slower modes including bike and car hire options.

8. Landscaping/Boundaries/Public Open space

The applicant is requested to provide the following:

- a) Tree survey drawing
 - b) Tree protection plan in accordance with BS5837:2012 including location of tree protection fencing
 - c) The Planning Authority notes concerns that the proposed open space provision falls short of the required 15%. Accordingly, the applicant is requested to submit a revised Site Layout Plan indicating the dimensions and areas of all designated open space. Please note that the archaeological monument including buffer should not be included in the open space calculations.
 - d) Please reduce the amount of Birch Trees along streets to future proof in case of disease.
- Plan/exercise equipment requirements are not in compliance with the Limerick Development Plan. Equipment for all age groups including formal and natural play are to be provided. A small park as per Table DM 2 of the Limerick Development Plan is required.
 - Provide schedule of all proposed play and exercise equipment types and numbers
 - Provide a buffer to car parking to reduce conflict potential
 - Some tree planting in narrow verges appears unrealistic. Please clarify on construction detail used for those instances.

- The northern verge along the access road shall be widened to increase distance of trees to road and give more sustainable growing conditions.

9. Lighting Arrangements

Please submit a lighting design fully in line with Limerick City and County Council's Public Lighting Specification and shall include the following.

- Must show lux levels.
- Submit warranties.

10. Surface Water & SuDs Management Plan

- (a) Please submit a redesign solution that adequately addresses surface water management. The current approach, which relies on discharging to the existing LIHAF soakaway, is unacceptable as this soakaway was a temporary measure and is not sized for the proposed development flow.

The pumped solution originated from a request by Central Services to act solely as an overflow system. While this will provide contingency in the event of infiltration failure, it is acknowledged and accepted that such a system could lead to long-term maintenance costs for the local authority when the estate is taken in charge.

- (b) Please submit revised drawings and supporting documentation demonstrating compliance with Limerick City and County Council's Surface Water & SuDS Specification. The submission should include:
- Accessible and EV bays must not use permeable paving (due to painting requirements).
 - Details of the storm water pumping station are required and must be to Uisce Eireann standards.
 - The location of the proposed SW Rising Main is not in line with Uisce Eireann Standards.
 - Consider an alternative to detention basin or redesign that level of surface water it potentially holds is reduced in depth.
 - Submit a cross section of the proposed green blue roof with construction buildup with clear specifications and with overflow systems.
 - Show the public realm permeable paving connected with access chambers for maintenance and with overflow system to the main internal surface water pipeline.
 - Improve clarity of the layout plans—vent stacks and alarm/messaging units for interceptors are difficult to locate.
 - Confirm that permeable paving driveways are designed as sealed systems.
 - Include raised SuDS planters for each unit.
 - Submit a Stage 1 Storm Water Audit.
 - A revised Engineering Services Report is required to include section for the surface water pumping station and for the surface water rising main. Include for hydraulic modelling shall be submitted for the design of the pipes at a 1/5-year return period.

11. Part V

The applicant is to provide information in respect of the Approved Housing Body that is proposed. Alternatively, the applicant should propose alternative units dispersed throughout the development.

12. Taken in Charge

Please submit a site layout plan indicating the areas to be taken in charge by Limerick City and County Council. The plan should also reflect areas to be managed by a Management Company.

13. Letters of Consent

- (a) Provide written confirmation of a pre-connection agreement with Uisce Éireann for the proposed development of 180 units + creche prior to commencement of works. In the absence of such confirmation, evidence shall be provided demonstrating that an application for a pre-connection agreement has been lodged with Uisce Éireann.
- (b) Confirm that discussions have been held with Gas Networks Ireland
- (c) Confirm that discussions have been held with the utility provider in relation to the overhead powerlines.

PLEASE NOTE:

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

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

Yours faithfully,

A handwritten signature in dark ink, consisting of a large, stylized loop followed by a horizontal stroke.

(for) Senior Planner,

Planning Development