COAKLEY O'NEILL
town planning

Planning Statement

Large Scale Residential Development
at Old Orchard, Monaleen,

Co. Limerick

Prepared in June 2026 on behalf of

GLR Property Ltd.

Coakley O'Neill Town Planning Ltd.

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1.0 INTRODUCTION

1.1 We, Coakley O'Neill Town Planning Ltd, of NSC Campus, Mahon, Cork, have been instructed by our clients GLR Property Ltd., to prepare this Planning Statement in respect of an application for a Large-Scale Residential Development (LRD), which represents modifications to the permitted Large-Scale Residential Development granted by An Bord Pleanála under Appeal Case Reference ABP-319009-24 on a site at Golf Links Road, Castletroy, Limerick and a site at Evanwood, Castletroy, Limerick.

1.2 The proposed development was subject to a Section 247 Large-Scale Residential Development Pre-Planning on the 24th of July 2025 at the Limerick City and County Council's Dooradoyle Offices.

1.3 A subsequent S32C LRD Opinion Meeting was held on the 4th December 2025 at the offices of Limerick City and County Council.

1.4 This Planning Statement sets outs the rationale and justification for the proposed development having regard for various policies and objectives at national, regional and local level in the context of the proper planning and sustainable development of the area.

1.5 Emphasis where added to quotations, are ours.

2.0 SITE LOCATION AND DESCRIPTION

2.1 The proposed development is located within Monaleen, County Limerick. Monaleen forms part of the wider Ballysimon/Castletroy suburb of Limerick City which has seen substantial levels of both residential, educational and commercial development over the last number of years.

2.2 Monaleen has a strong base of existing educational and sports facilities in addition to retail and hospitality services. The immediate surroundings of the site can be considered to be residential in nature with 3no. well established residential developments bounding the site – Evanwood to the south, Kylemore to the east and Ashfort to the north.

2.3 The overall site area comprises of 3.54 hectares, and the site, while previously in agricultural use is now in advance stages of construction in respect of residential units previously granted under Application Ref. 23/60842 and Appeal Ref. ABP-319009-24.

2.4 The site is bound to the west, south and east by existing residential developments. The site is accessed via the Golf Links Road, which bounds the site to the west and School House Road to the northern side.



Figure 1. Subject Site identified in Red in context of surrounding area.

3.0 PLANNING HISTORIES

3.1 The following planning history relates to the site:

- **Application Ref. 23/60842 and Appeal Ref. ABP-319009-24:** Permission was granted on the 19th January 2024 for the development of a Large Scale Residential Development of 122no. residential units comprising of 65no houses and 57no. apartments. The development included the provision of a 352.2 sqm creche with the capacity to accommodate 58no. children.

  Following a third-party appeal (Ref. ABP-319009-24), permission was granted for the development of 114no. residential units. Condition No.2 of the permission requires the omission of Apartment Block C (Unit Nos. 55-62) and that the area incorporated into a public open space and also the omission of Unit No. 95 with a buffer of 5 metres from the OPW channel provided. This layout has been agreed with the Planning Authority by way of compliance submissions.

- **Application Ref. 16/705:** In February 2017 planning permission was granted for the construction of 53 no. residential units and a crèche.

4.0 PLANNING POLICY PROVISIONS

4.1 This section sets out the relevant national, regional, and local planning policy applicable to the proposal.

National Planning Framework First Revision (2025)

4.2 The National Planning Framework (NPF), which forms part of Project Ireland 2040, is the national level statutory plan guiding land use and sustainable development in Ireland to 2040.

4.3 The NPF is guided, in part, by the aim of achieving regional parity in the country by significantly growing the population of both the Southern and the Northern and Western Regions over the next two decades, to counterbalance the urban dominance of the Greater Dublin Area.

4.4 It sets out a targeted population growth of an additional 300,000 people in the Southern Region by 2040.

4.5 In pursuing this population growth target, the NPF sets out to deliver 50% of our future development within the fiver major cities, with the remaining 50% to be delivered and accommodated within our larger and smaller rural towns.

4.6 In pursuing the national policy objective of delivering compact growth, the NPF sets out to deliver 40% of our new homes within existing settlement footprints.

4.7 The NPF sets out the following national objectives in relation to the future development:

> ***National Policy Objective 12:*** *Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.*
>
> ***National Policy Objective 13:*** *Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment, and prosperity.*
>
> ***National Policy Objective 14:*** *Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.*

4.8 Further to this, in relation to the development of housing, the NPF outlines that there is an acute need to develop good quality housing in suitable locations which can support diverse communities. In relation to this, the NPF sets out the following objectives:

> ***National Policy Objective 42:*** *To target the delivery of 50,000 additional homes per annum to 2040.*

National Policy Objective 43: *Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.*

Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)

4.9 *The Sustainable Residential Development and Compact Settlements Guidelines* were published in 2024 with a view to ensuring that new housing developments are provided at a residential density, which is appropriate to the development's location and context, while also facilitating the provision of an adequate supply of housing.

4.10 With regard to creating compact and balanced residential developments and settlements, the Guidelines set out the appropriate development density ranges for a range of settlement types, including:

City- Suburban/Urban Extension

Suburban areas are the low density car orientated residential areas constructed at the edge of cities in the latter half of the 20th and early 21st century, while urban extension refers to greenfield lands at the edge of the existing built-up footprint that are zoned for residential or mixed-use(including residential) development. It is a policy and objective of these Guidelines that residential densities in the range 35dph to 50dph (net) shall generally be applied at suburban and urban extension locations in Limerick, Galway and Waterford, and that densities of up to 100 dph(net) shall be open for consideration at 'accessible' suburban/urban extension locations .

4.11 In addition to identifying density ranges for new housing developments, the Guidelines outline updated development management standards, which must be adhered to by all planning authorities, and which include the following:

SPPR 1 - Separation Distances: *When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms16 at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces.*

SPPR 2 - Minimum Private Open Space Standards for Houses: *It is a specific planning policy requirement of these Guidelines that proposals for new houses meet the following minimum private open space standards:*

- *1 bed house - 20 sq.m*
- *2 bed house - 30 sq.m*
- *3 bed house - 40 sq.m*
- *4 bed + house - 50 sq.m*

4.12 A further reduction below these minimum standards may be considered acceptable where an equivalent amount of high quality semi-private open space is provided in lieu of the private open space, subject to at least 50 percent of the area being provided as private open space.

4.13 **Policy and Objective 5.1** addresses Public Open Space and states:

> *It is a policy and objective of these Guidelines that statutory development plans include an objective(s) relating to the provision of public open space in new residential developments. The requirement in the development plan shall be for public open space provision of not less than a minimum of 10% of net site area and not more than a minimum of 15% of net site area save in exceptional circumstances. Different minimum requirements (within the 10-15% range) may be set for different areas. The minimum requirement should be justified taking into account existing public open space provision in the area and broader nature conservation and environmental considerations.*

Limerick City and County Development Plan 2022-2028

4.14 The *Limerick City and County Development Plan 2022-2028* (hereafter the Plan) is the relevant statutory plan under which the regulation and development of the subject site is to be considered. Below, we set out policy provisions and objectives of the Plan that are relevant to the consideration of this proposal.

4.15 The subject site falls within 3no. zoning objectives which are as follows:

> ***New Residential*** *to provide for new residential development in tandem with the provision of social and physical infrastructure;*
>
> ***Existing Residential*** *to provide for residential development, protect and improve existing residential amenity;*
>
> ***Open Space and Recreation*** *to protect, provide for and improve open space, active and passive recreational amenities.*

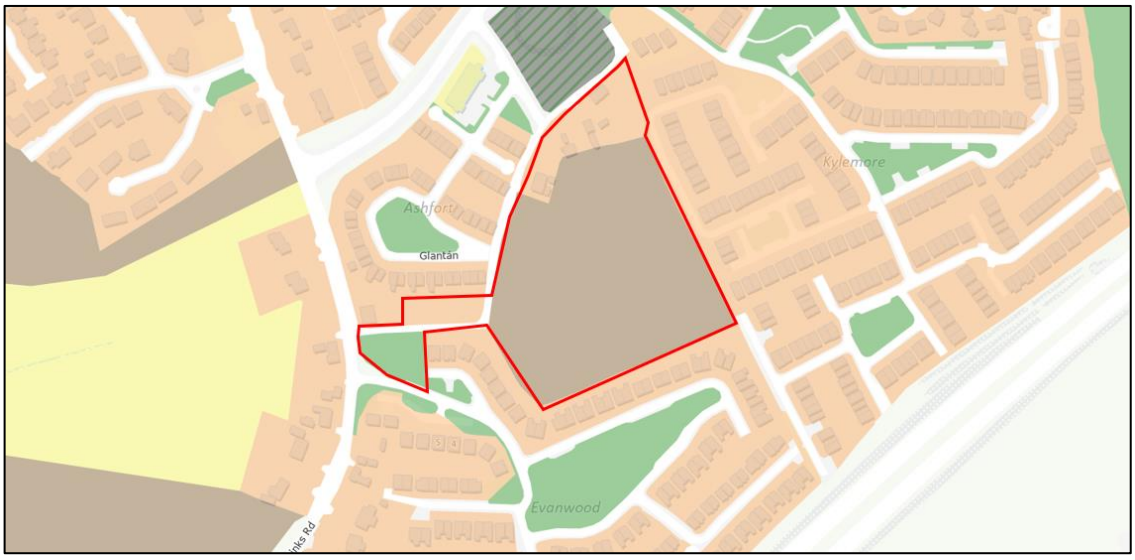


Figure 2 Subject Site in Relation to the Limerick City and County Development Plan Zoning.

4.16 The Plan outlines that the New Residential land use zoning 'is intended primarily for new high quality housing development, including the provision of high-quality, professionally managed and purpose built third level student accommodation. The quality and mix of residential areas and the servicing of lands will be a priority to support balanced communities. New housing and infill developments should include a mix of housing types, sizes and tenures, to cater for all members of society. Design should be complimentary to the surroundings and should not adversely impact on the amenity of adjoining residents. These areas require high levels of accessibility, including pedestrian, cyclists and public transport where feasible.

4.17 In regard to Existing Residential, the aim of this zoning is described as 'primarily for established housing areas. Existing residential amenity will be protected while allowing appropriate infill development. The quality of the zone will be enhanced with associated open space, community uses and where an acceptable standard of amenity can be maintained, a limited range of other uses that support the overall residential function of the area, such as schools, crèches, doctor's surgeries, playing fields etc'.

4.18 The aim of the Open Space and Recreation zoning objective is to 'provide for active and passive recreational resources including parks, sports and leisure facilities and amenities including greenways and blueways'.

4.19 The Core Strategy of the Plan identifies a planned population growth of 41,661 people over the plan period. Of this growth, 30,621 people are to live within Limerick City and its suburbs which includes Monaleen. To accommodate this population growth, the Plan identifies a housing delivery target of 11,442no. residential dwellings over the Plan period within Limerick Cities suburbs.

4.20 As per Policy CGR P3 the Limerick City Suburbs are a key driver of social and economic growth in Limerick and become a vibrant living, retailing and working City. The following objective relates to Limerick City and Suburbs:

Objective CGR 08: *It is an objective of the Council to:*

a) *Promote development which incorporates a high quality, sustainable and inclusive approach to proposals in the City and Suburbs (in Limerick), Mungret and Annacotty, which is supported by sustainable means of travel and which creates locally distinctive neighbourhoods and positively contributes to the existing built and natural heritage.*
b) *Promote residential development in the historic areas of Limerick City, provided development is consistent with the architectural integrity and character of the area.*

4.21 Chapter 4 of the Plan outlines the policies in relation to the development of housing in Limerick. It notes the acute need for housing both nationally and locally and acknowledges the role the local authority plays in facilitating the development of new housing. With regard to this, the plan sets out the following:

> ***Objective HO O1 Social Inclusion:*** *It is an objective of the Council to ensure that new developments are socially inclusive and provide for a wide variety of housing types, sizes and tenure, in suitable locations, throughout Limerick, to cater for the demands established in the Housing Strategy and the Housing Need Demand Assessment.*
>
> ***Objective HO O3 Protection of Existing Residential Amenity:*** *It is an objective of the Council to ensure a balance between the protection of existing residential amenities, the established character of the area and the need to provide for sustainable new development.*

4.22 Chapter 11 of the Plan sets out the development management guidelines which relate to residential developments this includes the following criteria which will be used when assessing applications for housing developments:

- *Land use zoning and specific objectives contained in the Plan and Local Area Plan/Urban Framework Plan/non statutory planning guidance adopted by the Council;*
- *Compliance with other policy requirements contained within the Plan;*
- *Consistency with relevant National and Regional policy objectives;*
- *Interactions with adjoining complementary uses and land use zoning objectives;*
- *Development of brownfield sites, underutilised and vacant sites is favoured over greenfield proposals;*
- *Density - higher densities should be provided in appropriate locations;*
- *The emphasis is on high quality materials, design and appropriate landscaping;*
- *The quality of the residential environment will be of primary significance in determining the acceptability of planning applications;*
- *Context - having regard to the setting of the site, the surrounding character, streetscape and the impact of any proposed development on the development potential of adjoining sites;*

4.23 Section 11.5.1 sets out the following guidelines in relation to the development of childcare facilities:

> *Where a new childcare facility is proposed as part of a new residential or commercial development, the facility shall be constructed in tandem with the overall scheme and shall be completed prior to residents moving in. In assessing individual planning applications for childcare facilities, the Planning Authority will have regard to the following:*

- *Type of service provided, whether sessional, full day care, pre-school, afterschool etc., number of children/staff and hours of operation;*
- *Suitability of the site for the type and size of facility proposed;*
- *Adequate sleeping/rest facilities;*
- *Adequate availability of indoor and outdoor play space;*
- *Convenience to public transport nodes;*
- *Safe access and convenient off-street car parking and/or suitable drop-off and collection points for customers and staff;*
- *Local traffic conditions;*
- *Number of such facilities in the area. In this regard, the applicant shall submit a map showing locations of childcare facilities within the vicinity of the subject site and demonstrate the need for an additional facility at that location;*
- *Applications for childcare facilities in existing residential areas will be treated on their merits, having regard to the likely effect on the amenities of adjoining properties and compliance with the above criteria;*
- *For new residential developments, the most suitable facility for the provision of full day care should be a purpose built, ground floor, standalone property.*

4.24 Table DM 9a sets out the development management guidelines in relation to the maximum quantum of parking acceptable.

4.25 The subject site is not the subject of any site specific objective or the location of any protected structure or recorded monument.

4.26 The site is not identified as being withing Flood Zones A or B.

5.0 PROPOSED DEVELOPMENT

5.1 The proposed development comprises of the modification of the Large-Scale Residential Development granted under Application Ref. 23/60842 and Appeal Ref. ABP-319009-24.

5.2 The proposed modifications comprise of:

1. The replacement of 57 no. units comprising of; 06 no. 4 bed semi-detached houses (139.2 sq.m.), 15 no. 3 bed semi-detached houses / townhouses (108 sq.m.), 06 no. 1 and 2 bed apartments (Block A) (54.1 sq.m. – 114.1 sq.m.), 14 no. 1 and 2 bed apartments (Block B)(54.1 sq.m. – 114.1 sq.m.) and 16 no. 1, 2, and 3 bed apartments (Block D)(50.2 – 123.2 sq.m.)

2. With 59 no. units comprising of; 04 no. 4 bed semi-detached houses (134.0 sq.m.), 22 no. 3 bed semi-detached houses (104.4 – 108.6 sq.m.), 04 no. 3 bed semi-detached houses (115.8 sq.m.), 08 no. 3 bed townhouses (109.8 sq.m.), 06 no. 2 bed townhouses (80.2 sq.m.) and 15 no. 1 and 2 bed apartments (61.6 – 71.9 sq.m.)

3. The provision of 5no. additional townhouse units (2 no. 3 beds and 3 no. 2 beds).

4. The omission of the permitted childcare facility with capacity to accommodate 58no. children and the construction of a childcare facility on a site to the west at Evanwood with capacity to accommodate 102no. children.

5. The development will also include the provision of private, communal, and public open spaces; internal roads and pathways; pedestrian and cyclist routes; hard and soft landscaping and boundary treatments; waste storage; plant; signage; public lighting; substations; all associated site development works; and all drainage and foul sewer infrastructure and network works including nature-based suds measures. A Natura Impact Statement (NIS) accompanies this application and has been submitted to the Planning Authority.



Figure 3. Proposed Development (Source Deady Gahan Architects).



Figure 4. Proposed Development (Source Deady Gahan Architects).

6.0 PLANNING ASSESSMENT

Principle

6.1 The proposed development comprises of the modification to the permitted residential development granted under Application Ref. 23/60842 and Appeal Ref. ABP-319009-24. These modifications consist of:

1. Replacement of 57no. permitted units (21no. houses (6no. 4-bed, 15no. 3-bed) and 36no. 1 and 2 bed apartments across 3 blocks) with 59no. units (44no. houses (4no. 4-bed, 34no. 3-bed, 6no. 2-bed) and 16no. 1 and 2 bed apartments);
2. The provision of 5no. additional townhouse units (2 no. 3 beds and 3 no. 2 beds);
3. The omission of the permitted childcare facility with capacity to accommodate 58no. children and the construction of a childcare facility on a site to the west with capacity to accommodate 102no. children.

6.2 As outlined the subject site falls within 3no. zoning objectives which are New Residential, Existing Residential and Open Space and Recreation.

6.3 The residential elements of the proposed development fall within the lands zoned New and Existing Residential.

6.4 The objective of lands zoned 'New Residential' is to provide for new residential development in tandem with the provision of social and physical infrastructure with the objective of delivering primarily new high quality housing developments on these lands.

6.5 The objective of lands zoned 'Existing Residential' to provide for residential development, protect and improve existing residential amenity while allowing for infill residential development.

6.6 The Plan advises that residential dwellings are appropriate for lands identified with this zoning objective.

6.7 As indicated above, the site of the proposed creche is zoned as 'Open Space and Recreation'. The objective of this zoning is to 'protect, provide for and improve open space, active and passive recreational amenities'. Under the aim of this zoning, the Plan identifies that the Council will **not normally** permit development that would result in a loss of open space.

6.8 Objective SCSI O19: Protection of lands zoned for Open Space and Recreation states the following:

It is an objective of the Council to:

a) Protect existing open space, by not permitting development which encroaches on open space and would result in reducing the recreational value to the public.

b) *Protect semi-natural open space areas from inappropriate development in the interest of recreational enjoyment, community health and well-being, flood protection and biodiversity.*

6.9 Yet, in this instance, as the site is not existing open space and is hoarded off from public access. It can be concluded that:

- With respect to point (a) of the policy, the proposed development doesn't encroach on open space and **does not** result in a reduction in the recreational value to the public, and
- With respect to point (b) of the policy, **does not** comprise semi natural open space.

6.10 The exceptional and unique nature of the issues arising in this instance is elucidated below.

6.11 Under the LRD application, Register Reference 2360842, the crèche facility was permitted at the northeastern boundary of the site adjacent a green area with an identified archaeological ring fort feature and backing onto an OPW channel from which a 5m buffer is required.



Figure 5. Proposed Development (Source Deady Gahan Architects).

6.12 Following a review of the permitted scheme, the reasoning behind our clients' preference to relocate the crèche stem firstly from its commercial unviability. At 352.2sqm and providing 58no. childcare places, it is not large enough to provide for a viable childcare enterprise at this location. This point was highlighted repeatedly in public submissions made to the original planning application.

6.13 Our clients have experience in developing crèche facilities as part of housing schemes elsewhere and have operators interested in taking such facilities. The preferred size in terms of viability is a facility that provides for c.100no. children, across the full range of ages, and including for toddler and wobbler rooms.

6.14 While requiring a larger crèche building, this also results in a requirement for larger play and parking areas. In this instance, a 102no. child crèche would still require approx. 460sqm. of play space, where a 58no. child crèche would only need half that. The parking provision in this location also requires a maximum standard of 1no. parking space per 40sqm + a set down spot, increasing the size of the crèche in this area would also increase the quantity of parking needed.

6.15 Upon design review it was found that the permitted crèche site cannot adequately accommodate a larger facility, particularly given the existing trees and the boundary and the need to maintain a buffer from the OPW channel, without an unnecessary loss of residential dwellings and a subsequent reduction in residential density.

6.16 A second factor driving the relocation is the fact that there is an existing crèche facility at this location at Ashfort, only c. 70m from the permitted crèche site. Again, the potential impact in terms of traffic generation and congestion and its impact upon residential amenity at Ashfort, were all highlighted during the planning process.

6.17 Hence, a revised location for the crèche is both preferred, and indeed in our view, required.

6.18 Instead of relocating the crèche deeper within the housing estate creating further traffic, parking, and set down, conflicts with residential dwellings, our clients' intention is to relocate the permitted crèche to the site of a previously permitted crèche which fronts onto Golf Links Road, at the southern side.

6.19 It is considered that this is a much more preferable location and, had it been available to the applicants for the LRD scheme at the time, then it would have been advanced.

6.20 The intended site is closed at the entrance to the Evanwood Estate and has long been earmarked for the development of a crèche facility as part of that development but it has never been developed, contrary to the permitted scheme.

6.21 Indeed, the planning permission giving effect to that (Application Register Reference 16/705 – a conditional permission granted for the construction of 53 no. residential units and a crèche as part of phase 3 of the Evanwood development) is currently subject to a live planning enforcement action by Limerick City and County Council.

6.22 This enforcement action, Ref. DC-206-24, relates to non-compliance with planning conditions attached to that permission, including condition No.1 which requires the construction of the crèche facility.

6.23 Limerick City and County Council are therefore actively pursuing enforcement action against the developers of Evanwood for not constructing a crèche at the site our clients now intend to deliver same as part of this subject application.

6.24 In this regard, our client's proposals present a resolution to the outstanding enforcement matters at Evanwood.

6.25 In addition, under the most recent planning application at this site, Application Reg. Ref 21/1241, a proposal for the construction of a single storey pre-school building, Limerick City and County Council requested, by way of a Request for Further Information, the applicants revised their plans to instead construct a crèche facility in keeping with the site's planning history. The specific request relates to this read as follows:

Objective H1: New Housing as set out in the Castletroy Local Area Plan 2019-2025 requires the provision of community and other facilities such as childcare as an integral part of new developments. Having regard to the level of new housing permitted within the area and the lack of childcare facilities in the immediate vicinity it (is) considered that the proposed development of a pre-school does not meet the childcare needs or satisfy Objective H1 as set out above. Furthermore, the proposal as submitted is contrary to the permitted planning permission 16/705.

The applicant is requested to submit revised proposals which provide for full time and sessional childcare facilities. The revised facility shall also include a revised design having regard to the prominent location of the site at the entrance to Evanwood, a two storey building in keeping with the established character of the nearby residential development is considered appropriate.

6.26 It is acknowledged that the site was rezoned in 2022 under the Limerick Development Plan. It is now zoned as Open Space and Recreation.

6.27 Any suggestion that this originally permitted crèche cannot now be permitted as a result of a subsequent zoning change under the new Development Plan would be entirely inconsistent with both the permission changed and the Planning Authority live enforcement action at the site. Therefore, the provision of a crèche at the site must be considered.

6.28 With regard to this, the existing nature of the site is of relevance. As indicated, the site formed part of a residential development granted under 16/705, where a childcare facility was granted. However, this was not developed, and the site has remained brownfield and not in public use. This is illustrated below:

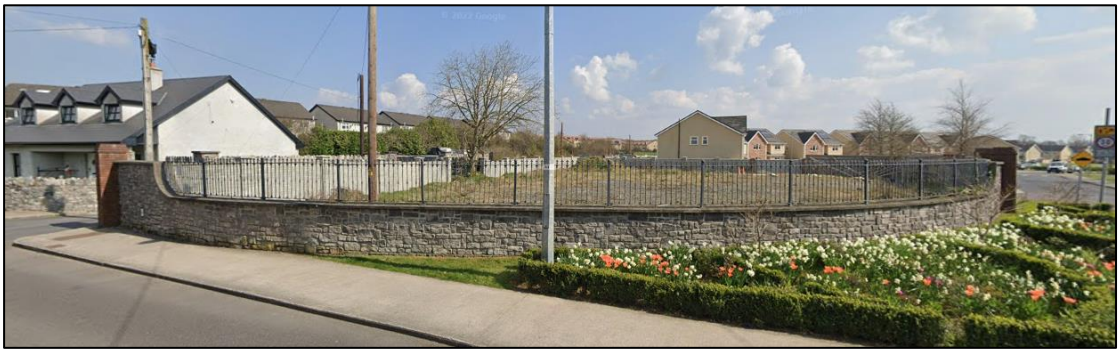


Figure 6. Current Site of Crèche Site



Figure 7. Current Site of Crèche Site – Hoarded off from Public Access

6.29 Furthermore, section 12.4 of the Plan details the Land Use Zoning Matrix, identifying various development types which may be permissible or not permissible in certain zoning types. When considering what is generally not permissible, a non-permissible use is *'one that would be incompatible with the zoning policies or objectives for the area, would conflict with the permitted/existing uses and would be contrary to the proper planning and sustainable development of the area'*.

6.30 It is clear from the site's planning history the proposed development of a childcare facility would not conflict with the existing use of the site, as no such use exists. Additionally, as detailed the previously permitted use on the site was for the development of a childcare facility.

6.31 As the Development Plan's zoning objective states that such a use will **generally** not be permitted, we conclude that there is scope to consider a proposal such as arising in this instance, which is clearly exceptional and unique.

6.32 In this regard, while the Development Plan's zoning may be contravened, it is not materially contravened.

6.33 It should be noted that in relation to existing open space within Evanwood, the extent of same was established under the estate's governing permissions and, at 9,740sqm, totalling 16.7% of site area, it already exceeds Development Plan standards and as such the proposed development of a creche at this site does not undermine the open space provision of Evanwood.

6.34 Further to the Planning Authority's LRD Opinion, the applicant has engaged with the Planning Authorities public consultation in regard to the Variation to the adopted Limerick City Development Plan.

6.35 The Proposed Variation No. 3 to the Limerick Development Plan 2022-2028 (as varied) was published by the Planning Authority on the 18th of April 2026.

6.36 The variation proposed to amend the zoning of the subject site from Open Space to New Residential under amendment Z14. This is welcomed by the applicant.

Amendment Z14 – Golf Links Road, Castletroy

Proposed Zoning Change	Site Area (ha.)	Proposed Text Objective
From: Open Space and Recreation/Ancillary Area **To:** New Residential	0.18 ha.	N/A

Existing Zoning	Proposed Zoning
	

Figure 8. Proposed Amendment Z14.

6.37 Under the land use zoning objectives of the adopted Limerick Development Plan, the development of Childcare facilities on lands zoned New Residential is permissible.

6.38 We note that the Strategic Environmental Assessment and Strategic Flood Risk Assessment undertaken by the Planning Authority does not raise any concerns from an environmental or flood risk perspective which would preclude from the proposed variation being adopted.

6.39 We also note that the submission on the Proposed Variation on behalf of the Office of the Planning Regulator has not identified any concerns in regard to the proposed amendment Z14.

6.40 Owing to the above, there is a strong rationale to the adoption of this proposed amendment to provide for the New Residential zoning at this site.

6.41 Further to this, the proposed variation provides a clear rationale for the permissibility of the proposed development from a land use zoning perspective.

6.42 Given the Plan's zoning objectives for the site and the residential character of the immediate area, a residential development is therefore the most appropriate use for the site. In addition, the principle of the development on the site is also supported by:

- The Government's national housing policy, Housing for All;
- The NPF which seeks to develop new housing within existing settlements; and
- The Mungret Framework, which earmarks Mungret for significant residential growth;

6.43 In light of all of the above, as the proposed development will provide 64no. new homes in Monaleen as well as a crèche facility which can accommodate 102no. children, it is submitted that the proposed development is acceptable in terms of the proper planning and sustainable development of the area and should be supported in principle.

Dwelling Types and Mix

6.44 The proposed development is for the construction of 64no. residential units, which includes a range of unit sizes and typologies. These are set out in detail in the application's Housing Quality Assessment but in general are as below:

Building / Unit Type	Bed Spaces	Unit Area (SQM)	Quantity
House A1	4 Bed	134	4
House B2	3 Bed	104.4	21
House B4	3 Bed	108.6	1
House C3	3 Bed	114.2	4
Townhouse D1	3 Bed	109.8	6
Townhouse D2	3 Bed	109.8	2
Townhouse D4	3 Bed	104.5	1

Townhouse D5	3 Bed	104.5	1
Townhouse E1	2 Bed	80.2	6
Townhouse E2	2 Bed	80.8	3
Apartment H1	2 Bed	71.9	5
Apartment H2	1 Bed	61.6	5
Apartment H3	2 Bed	69.4	5

Table 1. Proposed Unit Mix

Unit Type	Quantity	% Total
4-Bed	4	6.3%
3-Bed	36	56.3%
2-Bed	19	29.6%
1-Bed	5	7.8%
Total	**64**	**100%**

Table 2. Proposed Housing Mix

6.45 The Plan states that the provision of a good housing mix in all developments will be encouraged to ensure that residents have access to a range of house types and tenures which match the needs of households and to provide for new residential development which are socially inclusive.

6.46 This is further emphasised in Objective HO 01, which seeks to *ensure that new developments are socially inclusive and provide for a wide variety of housing types, sizes and tenure, in suitable locations, throughout Limerick, to cater for the demands established in the Housing Strategy and the Housing Need Demand Assessment.*

6.47 As indicated above in Tables 1 and 2, the proposed development includes for a wide range of unit sizes as well as a wide range of unit typologies, providing both apartments, townhouses and houses of all sizes.

6.48 The development provides for larger units for families in addition to smaller units which are suitable for those wishing to downsize units, creating a diverse and socially inclusive development.

6.49 The apartment units comply with *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2022)* and have regard to the *Design Standards for Apartments Guidelines for Planning Authorities (2025)*. The houses are designed in accordance with *Quality Housing for Sustainable Communities (2007)*. The various unit types are described in further detail in the application's Architectural Design Statement and Housing Quality Assessment.

6.50 Having regard to the above, it is considered that the proposed development will facilitate the development of inclusive residential communities within Monaleen by having the ability to cater for a wide variety of groups with different housing needs, all in accordance with national, regional and local planning policies.

Density and Height

6.51 The net residential density of the proposed development is 36.6 units per hectare, providing 180no. units across a site with a net developable area of 1.75 hectares.

6.52 As outlined, the Limerick City and County Development Plan identifies the suburbs of Limerick City as a key area for the provision of new sustainable residential development.

6.53 The subject site, as per Table 2.6 of the Plan is located within density Zone 3 – suburban edge, where a density of 35+ units is required.

6.54 The *Sustainable Residential Development and Compact Settlements Guidelines*, published in 2024, are also of regard. As per the guidelines the subject site is considered to be a city/suburban extension where *'it is a policy and objective of these Guidelines that residential densities in the range 35dph to 50dph (net) shall generally be applied at suburban and urban extension locations'.*

6.55 Having regard to the above, the proposed density of 36.6 units per hectare is considered to be in keeping with both national and local planning policies. The density as proposed successfully responds to planning policies seeking increased densities in line with compact growth targets while respecting the prevailing character of the area.

6.56 The development proposes building heights ranging from 2-storey to 3-storeys. All house types comprise of two-storey dwellings, and 5no. three-storey apartment blocks, each unit hosting 3no. apartments

6.57 The height and locations of these units have been given careful consideration. The three-storey units have been sited on corner sites where they provide overlooking of proposed open amenity spaces and act as nodal points within the development site itself.

6.58 Given the National and Local policies which seek enhanced urban densities, it is considered that the proposed apartment units represent a modest and appropriate scale of development that is in line with both National and Local policies.

6.59 The proposed development represents an increased residential density than that which is already developed both to the immediate west, east and south of the site, yet it still responds to the existing character of the area in a positive manner.

6.60 It is therefore submitted that the proposed scheme strikes an appropriate balance between achieving increased urban density in accordance with statutory policies and targets and respect for its existing urban context.

Crèche

6.61 The proposed development includes a crèche facility (585sqm) with capacity to accommodate 102no. children. A justification for the location of the crèche facility is presented above.

6.62 The design of the new crèche has been guided by the principles set out in the 2001 *Guidelines for Planning Authorities for Childcare Facilities* and the general childcare needs arising in the area.

6.63 In this regard, the proposed crèche represents a high quality childcare facility, which will provide an essential service to the future occupants of the proposed development as well as those living in the wider environs.

6.64 In addition, under the most recent planning application at this site, Application Reg. Ref 21/1241, a proposal for the construction of a single storey pre-school building, Limerick City and County Council requested, by way of a Request for Further Information, the applicants revised their plans to instead construct a crèche facility in keeping with the site's planning history.

6.65 The crèche now proposed has an increased capacity which ensures that it has sufficient capacity to meet the childcare needs of the increased residential units proposed under the LRD as well as an existing demand within the local area.

6.66 The proposed crèche provides for a total of 7no. of classrooms as indicated on the floor plans submitted with this application. In addition to this, the facility includes a sleep room, kitchen, lobby and reception, in addition to staff facilities including an office and staff canteen, all of which are provided over two floors.

6.67 The proposed development will therefore see the construction of a much-needed childcare facility and much needed housing in Monaleen, an area identified by Limerick City and County Council with the capacity to provide significant growth over the lifetime of the current Development Plan.

Public Open Space and Landscaping

6.68 The proposed development provides for 15% open space across the site. The Landscape Masterplan prepared by Simon Ronan Landscape Architects illustrates the central open spaces within the development which is 1,620 sqm in size.

6.69 The open space provides for a large lawn area for informal and ball play, a plaza and public seating as well as natural play area with extensive planting.

6.70 The proposed development also provides for extensive landscaping along the eastern boundary of the site which is required as a buffer from the OPW channel traversing the site.

6.71 The Landscape Masterplan provides a comprehensive landscaping and planting schedule, which includes tree planting, shrubs and groundcover and hedgerow planting.

Parking

6.72 The overall parking strategy is to promote sustainable travel through encouraging modal shift.

6.73 Section Table DM9a of the Development Plan sets out the maximum standards of parking provision required for both residential and commercial developments. As per Table 2.6 and DM9a, the site of the proposed development is located within Zone 3.

6.74 In accordance with the parking standards identified in the Plan, 112no. car parking spaces are proposed across the site. This parking provision provides for 2no. spaces per 3-4 bed house, 1no. space per apartment and 2/3-bed townhouse, and 10no. parking spaces, including 1no. set-down for the crèche facility. Universal Access and EV charging spaces are also provided.

6.75 It is proposed to provide 57no. bike spaces across the site. This provision comprises of 11no. bike stores with 3no. spaces each across the site within the curtilage of mid terrace units, a secure bike store to serve the creche (12no. bikes) and 12no. visitor bike spaces accommodated in a Sheffield stand. This provision is in keeping with SPPR 4 of the *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024).*

Access and Connectivity

6.76 The vehicular and pedestrian access to the proposed site remain unchanged from that granted under Application Ref. 23/60842 and Appeal Ref. ABP-319009-24 via the School House Road which also serves the adjacent Ashfort Residential Development.

6.77 It is proposed to provide a vehicular access to the proposed creche via the Golf Links Road. No vehicular access is proposed via the Golf Links Road to serve the residential development. The Golf Links Road will serve the residential development for pedestrians and cyclists only.

6.78 MHL Consulting Engineers have been engaged to prepare a Stage 1 Road Safety Audit which will accompany the application. All concerns identified by the RSA team and subsequent measures recommended will be accepted and incorporated into the proposed development.

6.79 A Design Manual for Urban Roads and Streets (DMURS) Compliance Statement has been prepared by OSL Butler Consulting Engineers. It concludes that the proposed development is consistent with both the principles and standards outlined in the guidance.

6.80 The proposed site layout therefore promotes and prioritises walking and cycling. While car parking has been provided, it is the objective of this layout to positively encourage users of the area to use the many safe and attractive pedestrian and cycle routes. For further information please refer to the DMURs Compliance Statement which accompanies this submission.

Services and Drainage

6.81 The proposed development represents a modification of a LRD Permission, as such the service proposals remain as permitted under Application Ref. 23/60842 and Appeal Ref. ABP-319009-24.

6.82 In regard to potable and foul connection, a Self-Lay Connection Agreement (CDS 2300489201) has been entered into between Uisce Éireann and our client for the 113no. units and creche, as per the original planning. A pre-connection feasibility enquiry was made to Uisce Éireann to confirm whether there is adequate capacity to accommodate the uptake in residential units. (CDS 2500700). The proposed connection was deemed feasible without upgrades.

6.83 The proposed development will also be served by new foul infrastructure. The foul network will be constructed in accordance with Uisce Éireann Code of Practice and Standard Details for wastewater infrastructure.

6.84 In regard to surface water, a Stage 2 Surface Water Audit was undertaken and submitted to Limerick City and County Council as part of the compliance of the extant permission. The surface water design and strategy have remained unchanged from the arrangements agreed with the Planning Authority under Application Ref. 23/60842 and Appeal Ref. ABP-319009-24.

6.85 Further detail on the proposed services and drainage for the development can be found in the reports prepared by OSL Butler Consulting Engineers which accompanies this submission.

Part V

6.86 A Part V agreement has been agreed with the Local Authority in relation to the wider permitted LRD which is now under construction. As such, agreement is in place for the 113no. units granted and Part V only applies under this application to the additional 7no. units proposed under this modification.

6.87 The applicant proposes to provide 2no. dwelling units to the Planning Authority to satisfy the 20% Part V allocation. These units comprises of units 6/7 Block B as granted under Application Ref. 23/60842 and Appeal Ref. ABP-319009-24.

6.88 A separate Part V Proposal, Layout and Costings forms part of the application documentation.

Natura Impact Assessment

6.89 A Stage 2 Natura Impact Assessment report has been prepared by Ecofact.

6.90 The assessment concludes that that there will be no significant effects on Lower River Shannon SAC, the River Shannon and River Fergus Estuaries SPA, or indeed any other Natura 2000 site. The development as proposed does not result in new potential sources of impact, and retain the same comprehensive suite of mitigation measures that were established to protect water quality and biodiversity.

7.0 CONCLUSIONS

7.1 The proposed development will result in the consolidation of a residential neighbourhood and community within Monaleen, in line with the overall development objectives for the suburbs of Limerick City as set out in the Limerick City and County Development Plan, contributing towards the creation of a new compact and sustainable community.

7.2 The proposed development will provide much needed housing along with a crèche facility with an increased capacity in close proximity to both existing and permitted residential developments on serviceable lands.

7.3 Having regard to the objectives of the Limerick City and County Development Plan 2022-2028, as well as the pattern of development in the local area, it is considered that the proposed development represents a high quality, residential development at an appropriate density that will complement the existing and evolving character of the local area.

7.4 Given the Plan's zoning objectives for the site and the residential character of the immediate area, a residential development is therefore the most appropriate use for the site. In addition, the principle of the development on the site is also supported by:

- The Government's national housing policy, Housing for All;
- The NPF which seeks to develop new housing within existing settlements; and
- The Mungret Framework, which earmarks Mungret for significant residential growth;

7.5 The proposed development does not give rise to any undue negative traffic, public health or other planning impacts and the proposal will not adversely affect the residential amenity of adjoining properties in the area.

7.6 The proposal does not give rise to any significant issues in relation to flooding, ecology, natural or built heritage, or archaeology and the site can be successfully serviced and connected to existing public systems.

7.7 In conclusion, it is therefore found that the proposed development is in accordance with the proper planning and sustainable development of the area, and, on this basis, it is respectfully submitted that the Planning Authority should support a grant of planning permission in this instance.