COAKLEY O'NEILL
town planning

Statement of Response to Council Opinion

Large Scale Residential Development at

Old Orchard, Monaleen,

Co. Limerick

Prepared in June 2026 on behalf of

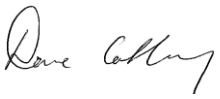
GLR Property Ltd.

Coakley O'Neill Town Planning Ltd.

NSC Campus, Mahon, Cork ☎ 021 2307023 ✉ info@coakleyoneill.ie www.coakleyoneill.ie

Document Control Sheet

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1	Draft	26th March 2026	RH	DC	
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1.0 INTRODUCTION

GLR Properties Ltd., intend to seek permission for the modification of the permitted Large-Scale Residential Development granted by An Bord Pleanála under Appeal Case Reference ABP-319009-24. The LRD proposed comprises of the replacement of 57 no. units with 59no. units, the provision of 5no. additional units and the omission of the permitted childcare facility to accommodate 58no. children and the construction of a childcare facility on a site to the west with capacity to accommodate 102no. children.

Following the LRD Opinion meeting on the 4th December 2025, the Planning Authority issued their Opinion on the 9th January 2026 which stated that the 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.
- Deady Gahan Architects
- OSL Butler Consulting Engineers
- Simon Ronan Landscape Architects
- Irish Archaeological Consultancy Ltd
- MHL Consulting Engineers
- Electric Skyline
- Ecofact Ecologists

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: Principle of Development – Land Use Zoning

> ***The relocation of the crèche to lands zoned "Open Space and Recreation" constitutes a material contravention of the Limerick Development Plan. Childcare facilities are not permitted under this zoning, and therefore the Planning Authority cannot support this element of the proposal at this time. The applicant is advised to consider engaging with the Development Plan variation process regarding rezoning the land which may allow for the development of childcare facilities subject to an appropriate variation of the current zoning.***

Response

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

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

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

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.

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.

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.

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

Under the LRD application, Register Reference 23/60842, 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.

Following a review of the permitted scheme, the reasoning behind our clients' preference to relocate the crèche stems 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.

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.100 children, across the full range of ages, and including for toddler and wobbler rooms.

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.

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.

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.

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

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.

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.

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.

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 phase 3 of the Evanwood development) is currently subject to a live planning enforcement action by Limerick City and County Council.

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.

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 the overall LRD scheme.

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

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.*

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

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. 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:

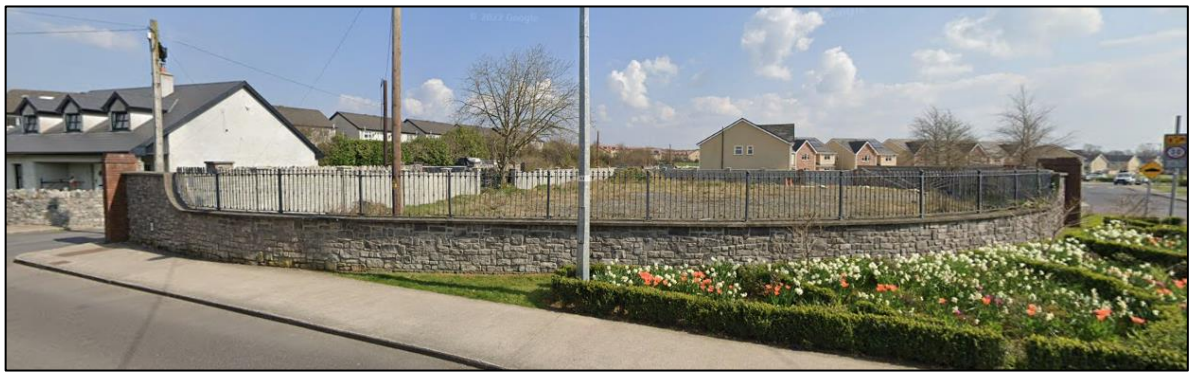


Figure 1. Current Site of Crèche Site.



Figure 2. Current Site of Crèche Site – Hoarded off from Public Access.

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'*.

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 above, the previously permitted use on the site was for the development of a childcare facility.

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.

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

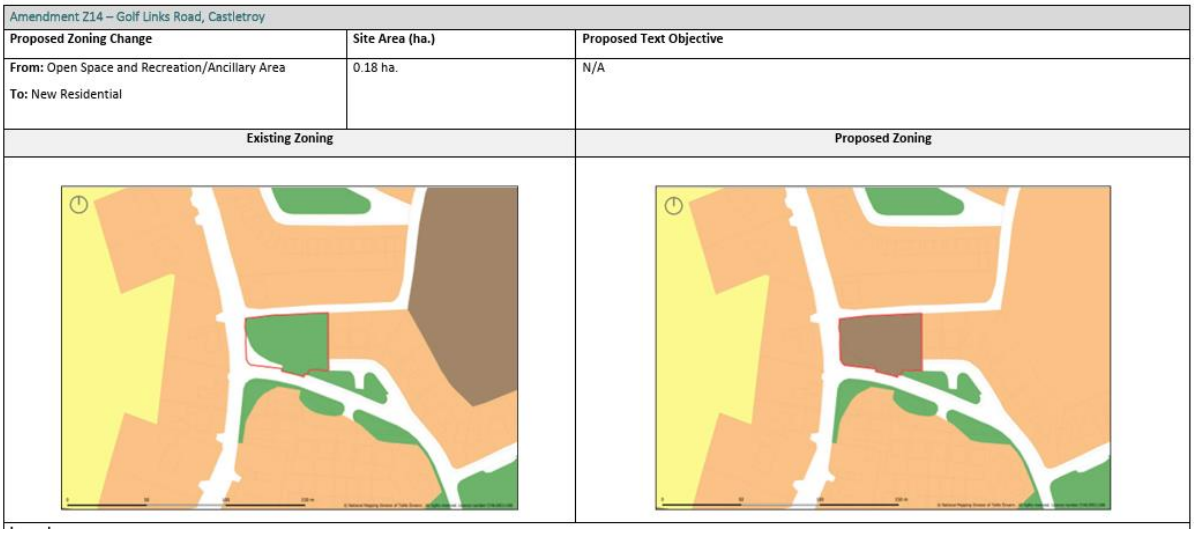
It should be noted that in relation to existing open space within Evanwood, the extent of same was established under the estate's governing permissions and, at 9,740sqm, totalling 16.7% of site area, it already exceeds Development Plan standards and as such the proposed development of a creche at this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

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 Development Plan.

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.

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 3. Proposed Amendment Z14.

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

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.

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.

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.

The proposed variation provides a clear rationale for the permissibility of the proposed development from a land use zoning perspective.

LRD Opinion Item 2: Site Layout and Access

a) Submit revised engineering drawings showing junction radii, footpath widths (minimum 2.0m), tactile paving, traffic calming details, and shared surface dimensions.

b) ***Complete and submit a Stage 1 Road Safety Audit prior to application and provide confirmation that Stage 3 Audit will be undertaken post-construction.***
c) ***Update parking layouts to include 20% EV charging spaces and ducting for all remaining spaces, in compliance with universal design guidelines.***
d) ***Redesign the site layout to maintain connectivity between the main open space and the linear green space along the OPW channel at the eastern edge of the site, as achieved in the original permission. The revised layout should enhance pedestrian priority across the site and consider truncating the proposed perimeter looped road to facilitate this connectivity.***

Response

In response to Item 2(a), please refer to the *Proposed Roads Layout, 25066-OSL-11-DR-C-1110,* with junction radii, footpath widths (minimum 2.0m), traffic calming locations and shared surface dimensions shown.

Please refer to the *Proposed Road Details Sheets, 25066-OSL-90-DR-C-9011 and 9012*, which includes traffic calming details.

For Item 2(b), a Road Safety Audit has been prepared by MHL, and accompanies the planning application under separate cover. The recommendations from the Stage 1 RSA have been incorporated into the final design. Furthermore, the applicant will undertake a Stage 3 RSA during the construction phase of the proposed development.

20% EV charging spaces and ducting for all remaining spaces is provided for.

The site layout has been amended to maintain connectivity between the main open space and the linear green space along the OPW channel at the eastern edge of the site.

LRD Opinion Item 3: Servicing and Lighting

a) ***Provide a comprehensive utility ducting plan for broadband and services, ensuring all cables are laid underground.***
b) ***Submit a lighting design fully compliant with the Council's Public Lighting Specification, including warranties and lux level drawings.***

Response

A comprehensive utility ducting plan for broadband and services will be developed at detailed design stage and coordinated in conjunction with the relevant utility providers and their relevant requirements. The applicant is happy to accept for a condition to be attached to submit the relevant utility ducting plans to the Planning Authority as part of planning compliance.

In respect of Item 3(b), please refer to the Public Lighting Layout and Reports, prepared by Electric Skyline, included under separate cover as part of this planning application.

LRD Opinion Item 4: Surface Water and SuDs

a) ***Revise drainage drawings to comply with the Council's Surface Water and SuDS Specification, including CCTV surveys, sealed permeable paving systems, curved StormTec attenuation tanks, and swale slope adjustments.***
b) ***Submit Stage 2 Detailed Design and Stage 3 Completion Storm Water Audits.***
c) ***Ensure finished floor levels maintain a 500mm freeboard, discharge rates do not exceed 2 l/s/ha, and pipe velocities are at least 1.0 m/s.***

Response

Please refer to the *Proposed Surface Water Layout, 25066-OSL-11-DR-C-1120*, and *Proposed Surface Water Detail Sheets, 25066-OSL-90-DR-C-9020 to 9026*, as well as Section 6 of the Engineering Services Report, *24011-OSL-00-RP-C-0001*.

The aforementioned layouts and reports illustrate compliance with the Council's Surface Water and SuDS Specification.

In relation to Item 4(b), a Stage 2 Surface Water Audit was prepared and submitted as part of the compliance of the governing permission for the site. With regard to this, the applicant is happy to accept a condition to submit the Stage 2 Detailed Design and Stage 3 Storm Water Audits to LCCC as part of planning compliance as part of detailed design of the scheme.

For Item 4(c), please refer to the *Engineering Services Report, 25066-OSL-00-RP-C-0001* (in particular Section 6), for confirmation in relation to freeboard maintained, discharge rates and pipe velocities in accordance with the Council's Surface Water and SuDS Specification.

LRD Opinion Item 5: Construction Management

Submit a revised Construction Management and Delivery Plan, including Site-Specific Temporary Traffic Management Plans.

Response

Please refer to the *Outline Construction and Environmental Management Plan, 25066-OSL-00-RP-0003*, and *Outline Construction Traffic Management Plan, 25066-OSL-00-RP-0005*, included as part of this application.

LRD Opinion Item 6: Archaeology

Submit an up-to-date archaeological assessment by a qualified archaeologist.

Response

An Archaeological Impact Assessment has been prepared by IAC Archaeology to accompany the planning application. Please refer to the accompanying Archaeological Impact Assessment.

LRD Opinion item 7: Ecology

a) Submit updated bat surveys for any remaining buildings scheduled for demolition immediately prior to works. If bats are found, the NPWS must be contacted.

b) Landscaping plans must prioritise native species of Irish genetic stock; any non-native species used must not pose a risk of self-spread.

c) Maintain a 5m wide buffer strip along the OPW channel on the eastern boundary, with full details of its treatment during construction and operation phases agreed in writing with the Planning Authority.

d) Submit an EIA screening report to address cumulative and site-specific considerations.

Response

a) No demolition is proposed under the subject planning application, any demolition work granted previously under planning application 23/60842 (ABP-319009-24) has been completed in accordance with the permission. Owing to the above, no bat surveys are required to be undertaken.

b) Please refer to the Landscape and Green Infrastructure Report prepared by SRLA which accompanies this submission. As set out within the Report, all planting species and wildflower seed mixes from the Irish Pollinator Plan. This ensures the landscape supports local ecosystems, enhances pollinator habitats, and promotes long-term ecological resilience.

c) In regard to the maintenance of the 5m buffer during construction, please refer to the Outline Construction and Environmental Management Plan, 25066-OSL-00-RP-0003, and Outline Construction Traffic Management Plan, 25066-OSL-00-RP-0005, included as part of this application that addresses the management of the 5m wide buffer strip along the OPW channel on the eastern boundary during construction stage of the proposed development. In regard to the operational phase, please refer to the Landscape Masterplan prepared by SRLA which illustrates the required buffer.

d) An EIA Screening Report has been prepared by Coakley O'Neill Town Planning Ltd., which concludes that there will be no real likelihood of significant effects on the environment arising from the proposed development and that an EIA is not required.

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

Comhairle Cathrach & Contae Luimnigh
Limerick City & County Council

Pleanáil, agus Cruthú Áite
Comhairle Cathrach agus Contae Luimnigh
Bothar Thuar an Daill
Tuar an Daill, Luimneach
V94 WV78

Planning and Place-Making
Limerick City and County Council
Dooradoyle Road
Dooradoyle, Limerick
V94 WV78

9th January 2026

Rory Hanrahan

Coakley O'Neill Town Planning Ltd

NSC Centre

Mahon

Co. Cork

By E-mail: rory@coakleyoneill.ie 021 2307026

LRD PRE-PLANNING REF: 1051910

LOCATION: Golf Links Road, Newtown, Monaleen

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. **Principle of Development – Land Use Zoning**
   The relocation of the crèche to lands zoned *"Open Space and Recreation"* constitutes a material contravention of the Limerick Development Plan. Childcare facilities are not permitted under this zoning, and therefore the Planning Authority cannot support this

element of the proposal at this time. The applicant is advised to consider engaging with the Development Plan variation process regarding rezoning the land which may allow for the development of childcare facilities subject to an appropriate variation of the current zoning.

2. Site Layout and Access

a) Submit revised engineering drawings showing junction radii, footpath widths (minimum 2.0m), tactile paving, traffic calming details, and shared surface dimensions.
b) Complete and submit a Stage 1 Road Safety Audit prior to application and provide confirmation that Stage 3 Audit will be undertaken post-construction.
c) Update parking layouts to include 20% EV charging spaces and ducting for all remaining spaces, in compliance with universal design guidelines.
d) Redesign the site layout to maintain connectivity between the main open space and the linear green space along the OPW channel at the eastern edge of the site, as achieved in the original permission. The revised layout should enhance pedestrian priority across the site and consider truncating the proposed perimeter looped road to facilitate this connectivity.

3. Servicing and Lighting

a) Provide a comprehensive utility ducting plan for broadband and services, ensuring all cables are laid underground.
b) Submit a lighting design fully compliant with the Council's Public Lighting Specification, including warranties and lux level drawings.

4. Surface Water and SuDS

a) Revise drainage drawings to comply with the Council's Surface Water and SuDS Specification, including CCTV surveys, sealed permeable paving systems, curved StormTec attenuation tanks, and swale slope adjustments.
b) Submit Stage 2 Detailed Design and Stage 3 Completion Storm Water Audits.
c) Ensure finished floor levels maintain a 500mm freeboard, discharge rates do not exceed 2 l/s/ha, and pipe velocities are at least 1.0 m/s.

5. Construction Management

Submit a revised Construction Management and Delivery Plan, including Site-Specific Temporary Traffic Management Plans.

6. Archaeology

Submit an up-to-date archaeological assessment by a qualified archaeologist.

7. Ecology

a) Submit updated bat surveys for any remaining buildings scheduled for demolition immediately prior to works. If bats are found, the NPWS must be contacted.

b) Landscaping plans must prioritise native species of Irish genetic stock; any non-native species used must not pose a risk of self-spread.
c) Maintain a 5m wide buffer strip along the OPW channel on the eastern boundary, with full details of its treatment during construction and operation phases agreed in writing with the Planning Authority.
d) Submit an EIA screening report to address cumulative and site-specific considerations.

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,

Caroline Kaegl

_____

(for) Senior Planner,

Planning Development