

Kirkland Investments Ltd

Statement of Response to LRD Opinion

Parkway Valley LRD

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Appendix A Limerick City and County Council LRD Opinion

1 Introduction

Tetra Tech Ireland Limited is instructed to prepare this *Statement of Response to LRD Opinion* on behalf of Kirkland Investments Ltd., to accompany an application to Limerick City and County Council (LCCC) in relation to a proposed Large-scale Residential Development (LRD) at a site referred to as “Parkway Valley”, on the Dublin Road (R445), Singland, Limerick, County Limerick.

An LRD pre-application meeting was held under section 32B of the *Planning and Development Act 2000*, as amended (the Act), between the applicant, its development team and LCCC on 19th November 2025 (Ref. 1051450). An LRD Opinion was received from LCCC on 19th December 2025 in accordance with section 32D of the Planning Act. A copy of the LRD Opinion is appended to this Response (see **Appendix A**).

The LRD Opinion stated that: *“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”*. In this regard, and pursuant to article 16A(7) of the *Planning and Development Regulations 2001*, as amended (the Regulations), the LRD Opinion set out a number of items of specific information which should be submitted with any application for permission.

The information as identified in the Opinion fell under 11 No. headings with some seeking a particular item of information and some seeking modifications to the development as proposed.

This Response document sets out each of the items of information identified in the Opinion and explains how and / or where each item is now addressed in the planning application documentation provided.

2 Density

Item Description (LRD Opinion)	Summary Response & Relevant Enclosures
<p>Based on the information submitted and a net residential area of 5.65ha, the density is calculated at 71 dwelling units per hectare which is considered to not be in line with the Sustainable Residential development and Compact Settlements Guidelines which would require a density of between 70-200dph. Given the sites high accessibility, urban neighbourhood location and surrounding land uses, it is considered that the proposed density should be increased.</p> <p>Further to the above as set out in Appendix 2 of the Compact Growth Guidelines the net site area must include:</p> <ul style="list-style-type: none"> - Local Streets as defined by Section 3.2.1 DMURS 	<p>The density of 71dph referenced by LCCC is based on the gross application site extent identified as s32B pre-application stage. It was not based on a net residential developable site area.</p> <p>We refer LCCC to the <i>Site Net Area Approach</i> drawing prepared by Reddy A+U which shows the extent of the net residential developable site area (3.08ha) based on the guidance set out at Appendix 2 of the Compact Settlement Guidelines.</p> <p>The net residential developable site area excludes:</p> <ul style="list-style-type: none"> • Land zoned Groody Valley Green Wedge • Land within a development exclusion zone 20m each side of 110kV Overhead Lines • The area of the proposed medical centre, • The main vehicular site entrance access which will serve the future employment uses on the site also. • Open space close to the front of the overall lands which will primarily be associated with future employment uses but which are included in the current application for urban design and amenity purposes in the short term.

Item Description (LRD Opinion)	Summary Response & Relevant Enclosures
<ul style="list-style-type: none"> - Private and semi-private open space - Car parking, bicycle parking and other storage areas - Local parks such as neighbourhood and pocket parks or squares and plazas - All areas of incidental open space and landscaping. 	<p>The net residential developable site area includes:</p> <ul style="list-style-type: none"> • The local streets within the 'residential' part of the site. • Private and semi-private open space, local public open space and incidental open space within the residential area. • Car parking, bicycle parking and other storage areas associated with the proposed residential development. <p>Based on the resulting net residential developable site area of 3.08ha, the proposed net density for this first phase of Parkway Valley will be 131dph.</p>

3 Design and Layout

Item Description (LRD Opinion)	Summary Response & Relevant Enclosures
<p>Schedule of accommodation to include all apartments showing compliance with Appendix 1 of the Apartment Guidelines.</p>	<p>This information requirement is addressed in the <i>Housing Quality Assessment (HQA)</i> rather than the Schedule of Accommodation.</p> <p>An updated <i>Housing Quality Assessment (HQA)</i> prepared by Reddy A+U is enclosed with this application. It provides detailed information for each proposed residential unit and demonstrates each unit's compliance with the requirements and recommendations of Appendix 1 of the Apartment Guidelines. It includes details on:</p> <ul style="list-style-type: none"> • Apartment floor areas • Widths of living / dining rooms • Bedroom widths • Storage space • Private amenity space
<p>Planning Statement should include the following:</p> <ul style="list-style-type: none"> - Breakdown of bike parking per use and include for staff figures associated with creche and medical centre - Rationale and justification for the number of car parking spaces proposed - Rational and justification for the proposed density 	<p>The required bicycle parking information is addressed in the <i>Traffic and Transportation Assessment (TTA)</i> by Punch Consulting Engineers and the density information is addressed in both the <i>Planning Report</i> by Tetra Tech and the <i>Architectural Design Statement</i> by Reddy A+U.</p> <p>Table 6.2 of the TTA provides a breakdown of required and proposed bike parking per use, including those proposed to serve the creche and medical centre.</p> <p>Section 6.1 of the TTA provides a rationale and justification for the number of car parking spaces proposed. This is based on national policy provision along with site and location specific context. The total figure of 138 no. spaces has been determined as appropriate for the proposed mix of uses subject of this LRD and is fully compliant with the requirements of the Compact Settlements Guidelines and Limerick Development Plan 2022-2028.</p>

Item Description (LRD Opinion)	Summary Response & Relevant Enclosures
	<p>A rationale and justification for the proposed density of 131dph is provided in section 3.1.7 of the <i>Architectural Design Statement</i> by Reddy A+U and section 6.3 of the <i>Planning Report and Statement of Consistency</i> by Tetra Tech, both enclosed with this application. A rationale for a density range at the site of 125dph to 135dph is also presented in sections 2.2.2 – 2.2.4 of the <i>Masterplan</i> by Reddy A+U. The proposed residential density for Parkway Valley has been determined through consideration of the most applicable Area Type followed by a refinement exercise with regard to local and site context considerations.</p>
<p>The Planning Authority maintains its concerns in relation to the external balconies. The applicant is requested to submit revised design with any future planning application for the inclusion of internal balconies on all external elevations. The use of external balconies are considered appropriate overlooking the courtyards.</p>	<p>On receipt of the LRD Opinion the Applicant gave further consideration to its position in respect of external balcony provision as presented at the s32B meeting stage. This further consideration reconfirmed the Applicant’s view that the external balconies as proposed are an appropriate design response, are aligned with relevant planning policy and are in accordance with the principles of sustainable development. Furthermore, there are many precedent cases of such an approach to balcony design being permitted and constructed throughout the country.</p> <p>A detailed considered and supported rationale for the balcony design proposed is set out in section 4.13 of the <i>Architectural Design Statement</i> by Reddy A+U. The rationale addresses:</p> <ul style="list-style-type: none"> • Planning Policy • Residential Amenity • Visual Quality and Impact • Sustainable Development Principles • Precedence <p>Accordingly, the proposed design of private amenity space remains in the form of external balconies and terraces.</p>

4 Ecology

Item Description (LRD Opinion)	Summary Response & Relevant Enclosures
<p>The foundations of the buildings may require mitigation to prevent uncured concrete coming into contact with water.</p> <p>Assessment of same should be included for within the NIS</p>	<p>The potential for uncured concrete coming into contact with water is considered in a number of documents submitted with this application.</p> <p>In the first instance the potential for uncured cement coming into direct contact with groundwater in foundation construction, in particular piling is considered in the Hydrological and Hydrogeological Qualitative Risk Report and Chapter 6 Hydrology and Hydrogeology of the EIAR, which explains how potential for direct contact with ground water is limited to a very short localised</p>

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	<p>period. Potential for concrete contamination due to run-off is also considered in the EIAR with appropriate mitigation set out.</p> <p>The Report for the Purposes of Appropriate Screening and the Natura Impact Statement by Moore Group Environmental Services also consider the potential for concrete coming into contact with surface water and groundwater.</p> <p>With regard to potential direct interaction between fresh concrete and groundwater the NIS notes that this would be highly localised and short-lived during placement. It notes that the surrounding soils and bedrock provide buffering and dilution, and the low permeability of the soils means migration beyond the immediate pile location</p> <p>is considered highly unlikely. On this basis, impacts to groundwater quality from piling are considered negligible, and consequently there would be no likely impact on the River Shannon SAC.</p> <p>The NIS does identify potential for impact on surface water or ground water due to run-off and sets out mitigation for same. Further to this mitigation the NIS concludes that the possibility of any European Site considered in the NIS, arising from the Project, either alone or in combination with other plans or projects, can be excluded beyond reasonable scientific doubt.</p> <p><i>A Construction and Environmental Management Plan (CEMP)</i> prepared by Punch Consulting Engineers is enclosed with this application. The CEMP also incorporates the mitigation measures as recommended by the NIS.</p>
<p>Despite the habitats on site not being optimal for amphibians, frogs will use water bodies as small as puddles in which to breed and deposit spawn. The proposal should consider using "sub-optimal" in the reports rather than "unsuitable" in this regard.</p>	<p>Chapter 7 of the EIAR which addresses Biodiversity matters notes that a number of ditches near the site that have shallow stagnant stands of water with no instream flora and heavy/dense vegetation cover have sub-optimal value to amphibians.</p> <p>The NIS prepared by Moore Group also confirms that these ditches have sub-optimal value to amphibians such as newts and frogs."</p>
<p>Include for the use of tallest possible tree species to prevent light spill from tall buildings into the Groody Valley.</p>	<p>The Landscape Masterplan for the site prepared by JBA incorporates a line of supplementary native hedgerow and tree line on the eastern side of the site in areas where trees can be accommodated without interference with the 110kV overhead power line. Due to the presence of the overhead line however, the extent to which such planting is possible is restricted. The accompanying Landscape Planting Schedule Sheet identifies that Yew trees (<i>Taxus Baccata</i>) will be planted in the areas where they can be accommodated.</p> <p>In addition to the use of tree planting, the lighting at the eastern side of the site has been carefully considered in consultation with the scheme ecologists, to prevent light spill. This is detailed in the</p>

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	<p>enclosed <i>Site Lighting Report</i> by Maloney Fox Consulting Engineers.</p> <p>The Biodiversity chapter of the EIAR assesses the combined effect of these design proposals on maintaining dark conditions within habitats of the Groody Valley to the east. The Biodiversity Chapter accordingly states, “A new eastern treeline composed of native, locally appropriate species will be established along the road boundary to function as a light-blocking landscape feature. This planting will intercept low-angle spill from vehicle and amenity lighting, reinforcing the effectiveness of the bat-sensitive lighting design and maintaining dark conditions within habitats further east. This treeline will consist of both hedge species planted in a double row; hawthorn, blackthorn, hazel, with Yew interspersed at 2 – 3m intervals. The treeline will also enhance ecological connectivity by strengthening existing linear features and providing additional foraging and commuting structure for bats. Once established, this vegetated barrier will operate as a permanent, passive mitigation measure supporting the site’s long-term ecological function”.</p>
<p>The use of any non-native species capable of self-spread into the wider environment is not permissible.</p>	<p>Non-native species capable of self-spread into the wider environment will not be used as part of the proposed landscaping. The <i>Landscape Design Statement</i> and associated drawing pack prepared by JBA Consulting provides details of the planting of native species proposed for Parkway Valley.</p>
<p>A survey for opposite leaved pondweed in the open drain that is proposed for infill must be completed</p>	<p>We confirm that the proposed development does not include plans to infill any open drains. The Biodiversity chapter of the EIAR confirms that as no development of any adjacent drainage ditches are proposed, “the primary concern is maintaining good water quality during construction and operation”.</p> <p>In this regard, the <i>Construction Environmental Management Plan</i> by Punch Consulting Engineers incorporates mitigation measures for control of construction activities and water quality status.</p> <p>The Engineering Planning Report by Punch presents details of the surface water drainage proposals including SUDS measures which incorporate measures to control the quality of water being discharged ultimately to the outfall ditch.</p>
<p>Any trees on site proposed to be felled, that have any bat roost potential must have a bat survey and if required, derogation licence prior to removal</p>	<p>A <i>Bird & Bat Report</i> by Éire Ecology is enclosed at Appendix 7.1 of the EIAR submitted. It confirms that a Ground Level Tree Assessment was undertaken to determine bat roost potential, and confirms that the 27 No. trees and clumps of trees assessed had no potential for bat roosts.</p> <p>No derogation licence requirement arises.</p>

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The development should provide for the inclusion of a stand-alone bat house designed to include features for LHB as a welcome enhancement measure	<p>A stand-alone bat house is proposed to be located in the open space area at the east of the application site. The bat house incorporates design features such as light-reduction measures and Pine Marten proofing to enhance its attractiveness for bats.</p> <p>The location and details of the proposed bat house is shown on the <i>Bat House</i> drawing prepared by Reddy A+U and enclosed with this application. It is also shown on the proposed Site Layout Plan.</p>
Swift bricks and other habitat enhancement measures included are welcome	Six treble integrated swift boxes are proposed to be installed into the eastern exterior wall of Block C. This is confirmed in the Biodiversity chapter of the EIAR.

5 Active Travel

Item Description (LRD Opinion)	Summary Response & Relevant Enclosures
Section 11.8.7 of the Limerick Development Plan (2022-2028) concerns end of journey cycling facilities that are considered critical to support modal shift. To encourage the use of slower modes provision should be made for lockers and showers in the crèche and medical centre.	<p>The Development Plan suggest the following provisions amongst others:</p> <p>One shower for high tech / manufacturing and employment development over 100sq.m. (over 5 employees), and</p> <p>Two showers for high tech / manufacturing and employment development over 500sq.m. (25 employees).</p> <p>End of journey cycling facilities, including changing rooms, showers and lockers, are proposed for both the creche and medical centre. The locations of these facilities are shown on the <i>Block B – Floor Plans</i> and <i>Medical Centre – Plans</i> drawings prepared by Reddy A+U and enclosed with this application.</p> <p>With regard to the size and expected staff numbers at the creche and medical centre, the proposals provide for:</p> <ul style="list-style-type: none"> • One shower at the creche • Two showers at the medical centre.
All short term bike storage solutions should be close to the access /egress of the building it is intended to serve for security reasons.	<p>Visitor bicycle parking stands are provided in proximity to access / egress points for each residential block and the separate medical centre.</p> <p>The <i>Proposed Active Travel Site Plan</i> prepared by Reddy A+U shows the location of all proposed visitor bicycle parking stands. These are also identified on the <i>Site Layout Plan</i>.</p>

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<p>The breakdown of long term secure bike storage (570 spaces in the basements) was stated at 80% racking, with 20% Sheffield type stands. This ratio for residential development is too high for racking. The site is not constrained in terms of area, bike storage should be accessible to all, racking can be noisy and is better suited to non-residential uses. The maximum percentage of racking as a secure bike storage solution should be 50%, with provision for non-standard bike storage including cargo bikes, scooters and EV charging for electric bikes.</p>	<p>The breakdown of secure residential bicycle storage types allocated to residents has been amended to provide a higher percentage - 40% of non-racking spaces. The proposed overall breakdown of secure residential bicycle parking spaces is as follows:</p> <ul style="list-style-type: none"> • 220 no. (37%) Sheffield stands; • 18 no. (3%) Cargo stands; and • 352 no. (60%) racking. <p>It is submitted that this allocation of storage types is appropriate for the residential element of Parkway Valley. The potential for noise impacts arising from racking is mitigated by the location of bike stores either at basement level or in external bike stores.</p> <p>The location of all proposed bike storage and details regarding type and allocation are shown on the <i>Site Wide – Bike Parking Layout</i> prepared by Reddy A+U.</p>
<p>The creche and medical centre should also provide for non-standard bikes.</p>	<p>Bicycle parking areas for the medical centre and creche will each be provided with 1 no. cargo bike space. The remainder of spaces in each area will be Sheffield stands.</p>
<p>A covered parent drop area for the crèche is required, the relocation of the bike storage from the opposite side of the service road is noted. A covered and secure structure for crèche staff to store bikes is also required if not internalised within the building, the same for the proposed medical centre.</p>	<p>A covered drop-off area is proposed outside the main entrance to the creche at the northeastern corner of Block B.</p> <p>An external bike and bin store building is proposed to be located adjacent to the creche in Block B. This store will have a dedicated bike parking facility for creche staff which will provide 8 no. Sheffield stand spaces and 1 no. cargo bike space.</p> <p>Both features are shown in detail on the <i>Block B – Floor Plans</i> drawing prepared by Reddy A+U and enclosed with the application.</p>
<p>The lack of a dedicated cycle lane along the main service road from the new junction with the Dublin road to the bottom of the site (from the left in left out junction) is a missed opportunity. The width of the green pedestrian and cycle travel route as shown on the active travel map should be a minimum of 3 meters in width (no dimension is shown).</p>	<p>In accordance with Table 2.1 of the Cycle Design Manual, it was determined that a mixed traffic and cycle provision was most appropriate for the main internal road. Section 6.3.1 of the <i>Traffic and Transportation Assessment</i> prepared by Punch Consulting Engineers states that:</p> <p><i>“There is a clear distinction between the busy Dublin Rd where cyclists will be accommodated for in segregated cycle tracks in the future and the quieter internal development road. Additional line marking has been added to the proposed carriageway to identify the cyclist on the shared road surface.”</i></p> <p>The <i>Proposed Active Travel Site Plan</i> prepared by Reddy A+U has been revised to confirm that the main internal road will be shared between car and cycle traffic, and that the adjacent pathway will be a dedicated pedestrian route.</p>

Item Description (LRD Opinion)	Summary Response & Relevant Enclosures
<p>The pedestrian crossing at the new left in left out junction with the Dublin road is too far from the junction, it will not be used by pedestrians. Pedestrian priority is required through this junction, with a raised entry level detail. Exact details to be agreed with the roads section and active travel.</p>	<p>The pedestrian crossing at the junction with the Dublin Road (R445) has been moved closer to the junction to ensure that pedestrian priority is achieved.</p> <p>The amended alignment and details of the crossing are shown on the <i>Proposed Site Layout Plan</i> by Reddy A+U and <i>Proposed Roads Layout – Sheet 3</i> by Punch Consulting Engineers.</p>

6 Roads

Item Description (LRD Opinion)	Summary Response & Relevant Enclosures
<p>A Stage 1 Road Safety Audit shall be completed and submitted in accordance with TII Publication 'Road Safety Audit GE-STY-01024'.</p>	<p>A <i>DMURS Quality Audit including Stage 1 & 2 Road Safety Audit</i> has been completed by Bruton Consulting Engineers and is enclosed with this application.</p>
<p>The Applicant shall address all problems raised with the Stage 1 Road Safety audit in full and submit revised Site Layout Plans to include the recommendations of the Audits, which must be clearly labelled for acceptance by the Planning Authority.</p>	<p>Recommendations made by Bruton Consulting Engineers in the Road Safety Audit are addressed in the Feedback Forms enclosed in the Audit report and any resulting revisions have been incorporated in the Site Layout Plans and Roads Plans included with this application as appropriate.</p>
<p>The Applicant shall submit details of the proposed Audit Team</p>	<p>Details of the Audit team are provided in the <i>DMURS Quality Audit including Stage 1 & 2 Road Safety Audit</i> which is enclosed with this application.</p>
<p>The road marking shown at the pedestrian crossing points are reserved for controlled crossing. If it is not the intention to have controlled crossings then these should be revised.</p>	<p>All proposed pedestrian crossing points will be uncontrolled. The <i>Proposed Roads Layout</i> and <i>Road Markings & Signage Layout</i> plans by Punch Consulting Engineers enclosed with this application have been revised accordingly.</p>
<p>The Road Section requires a physical raised traffic island at the proposed new entrance to the R445 to allow for left and left out only and to prevent drivers from attempting to turn right out of the entrance.</p>	<p>The <i>Proposed Roads Layout</i> plans prepared by Punch Consulting Engineers have been revised to include the provision of a raised traffic island at the junction between the Dublin Road (R445) and Parkway Valley.</p>

Item Description (LRD Opinion)	Summary Response & Relevant Enclosures
The 'STOP' road markings shown inside the entrance off the existing roundabout have the potential to cause queuing issues at the R445. Please address	The 'STOP' road marking shown at the entrance off the existing Parkway Retail Park / R445 roundabout has been removed and replaced with an uncontrolled pedestrian crossing. The <i>Road Markings & Signage Layout – Sheet 1</i> drawing by Punch Consulting Engineers has been revised accordingly.
This is an LRD proposal, which is comprising of 403 No. apartments, a creche and a medical centre. The Road Section is not in agreement with the proposed Taking in Charge Map; we believe all this development would be managed by a Management Company and not taken in charge by Limerick City and County Council.	Following S32B consultation, the Applicant no longer proposes for the development to be taken in charge by LCCC. The development will be managed by a management company to be established by the Applicant in the case of a successful grant of permission.
Show directional signage so that the blocks and numbers can be found.	Directional signage for Parkway Valley has been designed by Reddy A+U and full details, including locations, are provided in Section 4.14 of the <i>Architectural Design Statement</i> .
Show advanced ramp signage.	Advanced ramp signage will be provided where appropriate and is shown on the <i>Proposed Roads Layout</i> plans prepared by Punch Consulting Engineers.
Show fully dimension layout.	All required dimensions of the proposed internal street network are included on the <i>Proposed Roads Layout</i> plans prepared by Punch Consulting Engineers.
Address footpath overhang at perpendicular parking (preferably by widening footpaths) again clearly show on Engineering Layouts, especially Road Signage & Markings Layouts.	Wheel stops will be provided where proposed car parking space abuts footpaths within the internal road network. The locations of all proposed wheel stops are shown on the <i>Road Markings & Signage Layout</i> plans by Punch Consulting Engineers enclosed with this application.
Provide house numbering signage: location, ornate design, dimensions, and mounting method.	Directional and block identifying signage has been designed by Reddy A+U and full details, including locations, are provided in Section 4.14 of the <i>Architectural Design Statement</i> .
Provide utility ducting layout for broadband (100mm uPVC, connected to each unit).	<i>Eir Ducting</i> and <i>ICT Ducting</i> layouts prepared by Moloney Fox Consulting Engineers are enclosed with this application and show the proposed ducting layout for broadband within the application site.

7 Electric Vehicle (EV) Infrastructure

Item Description (LRD Opinion)	Summary Response & Relevant Enclosures
Minimum 20% of parking spaces to have functioning EV chargers.	21 no. EV parking spaces will be allocated to the residential units, 2 no. for the creche, and 4 no. for the medical centre. The total proposed provision of 27 no. EV spaces equates to c. 20% of the total car parking spaces proposed. This provision is confirmed in section 6.1 of the Traffic and Transportation Assessment by Punch
Remaining spaces to be ducted for future EV installation.	As set out in section 6.1 of the Traffic and Transportation Assessment by Punch, all parking spaces will be cabled to allow for future installation of EV charging.
Accessible and EV bays must not use permeable paving (due to painting requirements).	Punch Consulting Engineers Drawing Nos. 231171-PUNCH-XX-XX-DR-C-0441 and 231171-PUNCH-XX-XX-DR-C-0442 (<i>Proposed Finishes Layout Sheets 1 & 2</i>) confirm that the surfacing of accessible and EV bays will be impermeable.
<p>Additional requirements:</p> <ul style="list-style-type: none"> - 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. - If the T-Junction tabletop ramps are at the same level as the footpath's tramline - (corduroy) tactile paving is require warning and direct VRU's. - Set down could affect sightlines. - Pedestrian routes need to be clearer. 	<p>Punch Consulting Engineers Drawing Nos. 231171-PUNCH-XX-XX-DR-C-0441 and 231171-PUNCH-XX-XX-DR-C-0442 0442 (<i>Proposed Finishes Layout Sheets 1 & 2</i>) clarify that footpaths or pedestrian areas are provided around all public realm parking spaces including EV and accessible spaces.</p> <p>The S9A – Type 1 Pavement section provided on Punch Drwg No. 231171-PUNCH-XX-XX-DR-C-0551 (<i>Roads Details – Sheet 1</i>) confirms that the surface course will comprise of 40mm Stone Mastic Asphalt (of 10mm nominal size).</p> <p>As set out in Drwg Nos. 231171-PUNCH-XX-XX-DR-C-0403 (<i>Proposed Roads Layout – sheet 3</i>) and 231171-PUNCH-XX-XX-DR-C-0404 (<i>Proposed Access Junction with R445 (Dublin Road)</i>) there is a continuous footpath proposed across the junction which is 75mm high, This is not the same height as the existing footpaths, which will need to be modified to meet the pedestrian crossing. The drawings consequently show a transitional area of tactile paving on the footpath at either side of the junction and on the central island.</p> <p>Drwg. No. 231171-PUNCH-XX-XX-DR-C-0402 (<i>Proposed Roads Layout – Sheet 2</i>) by Punch shows a sightline from the side road adjacent to the creche along the main scheme access road. Given the low anticipated traffic volumes and the absence of overtaking within the site, the sightline has been measured from the centreline of the side road lane to the centreline of the approaching lane on the main access road. The set down area does not fall within this sightline.</p> <p>Pedestrian routes are clarified on the enclosed Drwg No. PVAL-02-SW-L01-DR-RAU-AR-1013 (<i>Proposed Active Travel Site Plan</i>) by Reddy A +U</p>

8 Landscaping / Boundaries / Public Open Space

Item Description (LRD Opinion)	Summary Response & Relevant Enclosures
<p>Confirm compliance with the requirement of 10-15% of public open space.</p>	<p>Drwg No. PVAL-02-SW-L01-DR-RAU-AR-1016 (<i>Site Plan – Open Space Extents</i>) by Reddy A+U identifies and includes area calculations for public and communal open space within the application site. It confirms that within the gross site area (6.16ha), 2.09ha of open space will be provided which equates to 34% of the overall site area. It also confirms that 19% (1.18ha) of the net residential developable site area (3.08ha) will be delivered as open space.</p>
<p>Landscape drawing should include all areas of open space - private, communal etc and include square meterage and detailed sectioned drawings taken from a number of points through each area of open space should be provided to demonstrate usability.</p>	<p>As above, Drwg No. PVAL-02-SW-L01-DR-RAU-AR-1016 (<i>Site Plan – Open Space Extents</i>) by Reddy A+U identifies and includes area calculations for public and communal open space within the application site. Calculations for private open space for each unit are set out in the HQA by Reddy A+U.</p> <p>The <i>Landscape Design Statement</i> prepared by JBA Consulting also incorporates this breakdown of open public and communal space by type and confirms the sq.m provision for each.</p> <p>JBA Drwg. No. PAV-JBA-XX-XX-DR-L-0002 (<i>Landscape Masterplan LRD</i>) sets out the detailed landscaping proposals for each area noting particular features with a distinct use such as community gardens, children’s play areas, basketball court, areas of exercise equipment, gathering areas, areas of sensory planting etc.</p> <p>JBA Drawing Nos PSO-JBA-XX-XX-DR-L-0005 and PSO-JBA-XX-XX-DR-L-0006 (<i>Landscape Sections</i> (2 sheets)) are also enclosed with this application and demonstrate the usability of each proposed area of open space.</p>

9 Lighting Arrangements

Item Description (LRD Opinion)	Summary Response & Relevant Enclosures
<p>Please submit a lighting design fully in line with Limerick City and County Council's Public Lighting Specification (2022):</p> <ul style="list-style-type: none"> i) Must show lux levels. The average lux of 7.5w does not appear to be achieved. ii) Submit warranties. iii) Revised luminaire choices. 	<p>A <i>Site Lighting Report</i> and <i>Site Lighting and Lux Levels</i> drawings prepared by Moloney Fox Consulting are enclosed with this application.</p> <p>The <i>Site Lighting Report</i> confirms that the lighting for the site is designed in accordance with Limerick City and County Council Public Lighting Design Specifications as well as a number of other relevant lighting standards.</p> <p>The Site Lighting drawings show lux levels. In addition section 4.0 of the <i>Site Lighting Report</i> confirms that the site lighting levels for the roads comply with IS EN 13201-2:2015 / BS 5489-1:2020 for roads and paths – class P3 (7.5 lux average, 1.5 lux minimum).</p> <p>The <i>Site Lighting Report</i> confirms that “Warranties shall be provided for all lighting products used for the development. Warranties can only be provided when an electrical contractor is identified during the construction phase of the project. During the construction phase, a full technical submittal shall be provided and submitted to LCC.”</p> <p>Details of the revised luminaire choices are provided in the <i>Site Lighting Report</i> enclosed with this application.</p>

10 Surface Water & SuDs Management Plan

Item Description (LRD Opinion)	Summary Response & Relevant Enclosures
<p>Please submit revised drawings and supporting documentation demonstrating compliance with Limerick City and County Council's Surface Water & SuDS Specification. The submission should include:</p>	
<p>Accessible and EV bays must not use permeable paving (due to painting requirements).</p>	<p>Punch Consulting Engineers Drawing Nos. 231171-PUNCH-XX-XX-DR-C-0441 and 231171-PUNCH-XX-XX-DR-C-0442 (<i>Proposed Finishes Layout</i> Sheets 1 & 2) confirm that the surfacing of accessible and EV bays will be impermeable.</p>
<p>Submit photographs of the condition of the open drain to which this development will discharge to.</p>	<p>Photographs of the open drain are provided at Figure 2-2 of the Engineering Planning Report by Punch Consulting Engineers.</p>

Item Description (LRD Opinion)	Summary Response & Relevant Enclosures
Include for a Kiosk to house the messaging system and alarm Class 1 Bypass interceptor and show vent stack.	Drwg No. 31171-PUNCH-XX-XX-DR-C-0102 (<i>Proposed Drainage Layout – Sheet 2</i>) prepared by Punch Consulting Engineers confirms that a kiosk and vent stack will be provided at the petrol interceptor.
Some surface water pipelines are outside normal velocity ranges and shall be revised.	The surface water drainage network as now proposed ensures all velocities are within normal velocity range. Please refer to Appendix C of the <i>Engineering Planning Report</i> by Punch.
Submit revised Surface Water Calculation Document.	Detailed surface water calculations are set out as follows in the <i>Engineering Planning Report</i> by Punch Consulting Engineers: <ul style="list-style-type: none"> • Appendix B: Greenfield Runoff Calculation • Appendix C: Causeway Surface Water Drainage Design Calculations
Submit a revised Surface Water and SuDS Layout Plan showing finished floor levels on same drawing so that the freeboard of the finished floor levels can be examined.	Section 2.2.2 of the <i>Engineering Planning Report</i> by Punch Consulting Engineers confirms that all proposed finished floor levels are 500mm above drainage water levels for a 100-year return period. Drwg Nos. 3 1171-PUNCH-XX-XX-DR-C-0101 and 3 1171-PUNCH-XX-XX-DR-C-0102 (<i>Proposed Drainage Layout - Sheets 1 & 2</i>) now include finished floor levels.
Reconsider the use of diffusers. There are concerns that they may easily silt up. Show the public realm permeable paving connected with access chambers for maintenance and with overflow system to the main internal surface water pipeline.	Diffusers are not proposed as part of the design. No permeable paving is proposed throughout the site. Road runoff is to discharge to the swale. Other hard standing areas are designed to drain to the bioretention areas around the site.
Improve clarity of the layout plans—vent stacks and alarm/messaging units for interceptors are difficult to locate.	A kiosk and vent stack are proposed at the interceptor prior to the detention pond. Drwg No. 31171-PUNCH-XX-XX-DR-C-0102 (<i>Proposed Drainage Layout – Sheet 2</i>) prepared by Punch Consulting Engineers identifies the location of the interceptor and notes the provision of a kiosk and a vent stack at the petrol interceptor.
Submit a Stage 1 Storm Water Audit.	A <i>Stage 1 Stormwater Audit</i> has been prepared by Punch Consulting Engineers and is enclosed with this application.

11 Part V

Item Description (LRD Opinion)	Summary Response & Relevant Enclosures
<p>If there are any changes to the number of apartments proposed, the applicant is requested to contact the Housing Department directly in relation to Part V provisions associated with the development.</p> <p>An agreement in principle letter shall be submitted with any future planning application.</p>	<p>A letter confirming an agreement in principle for the transfer of 81 no. units under Part V of the Planning Act was issued by LCCC's Housing Development Directorate on 13th May 2026 and is enclosed with this application.</p> <p>Details of the Part V proposals are also included with this application. This information includes drawings and details of the specific units proposed for transfer along with proposed associated costs.</p>

12 Letters of Consent

Item Description (LRD Opinion)	Summary Response & Relevant Enclosures
<p>A Pre-connection enquiry with Uisce Éireann shall be carried out and a confirmation of feasibility shall be submitted with any future LRD planning application.</p>	<p>A Pre-Connection Enquiry was made to Uisce Éireann prior to the S32B LRD pre-application meeting. A Confirmation of Feasibility was subsequently issued by Uisce Éireann to Punch Consulting Engineers on 30th October 2025 and is included in Appendix G of the <i>Engineering Planning Report</i> enclosed with this application.</p>

13 Noise

Item Description (LRD Opinion)	Summary Response & Relevant Enclosures
<p>The ADS indicates that undesirable road noise levels are set at 70dB Lden and 55dB Lnight in the Limerick Agglomeration Noise Action Plan 2024-2028. This is not the case. These were onset noise levels under previous noise action plans above which were used to establish hotspots for the assessment of road noise and identification of potential mitigation measures, where feasible. These are not levels recommended protecting the future population of Limerick from the harmful effects of road noise. The Acoustic Design Statement should be amended with regard to the above.</p>	<p>The <i>Acoustic Design Statement (ADS)</i> prepared by Dalton Acoustics has been revised to reflect the relevant standards of the <i>Limerick Agglomeration – Noise Action Plan 2024-2028</i>.</p> <p>The ADS notes that:</p> <p><i>“There are no national policy documents specifically addressing the acoustic design of residential dwellings. However, at the local level, the Agglomeration of Limerick Noise Action Plan 2024-2028 indicates that the guidance provided in ProPG may be used to assess noise impacts on new residential developments. This Acoustic Design Statement has been prepared in accordance with ProPG guidelines and, as such, aligns with the requirements of local policy.”</i></p>

Appendix A – LRD Opinion



Comhairle Cathrach
& Contae **Luimnigh**

Limerick City
& County Council

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

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

19th December 2025

Maria Lombard

RPS

Innishmore

Ballincollig

Co. Cork

P31 KR68

By E-mail: maria.lombard@rps.tetrattech.com

LRD PRE-PLANNING REF: 1051450

LOCATION: Parkway Valley, Singland, Limerick

Dear Madam,

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. Density

Based on the information submitted and a net residential area of 5.65ha, the density is calculated at 71 dwelling units per hectare which is considered to not be in line with the Sustainable Residential development and Compact Settlements Guidelines which would require a density of between 70-200dph. Given the sites high accessibility, urban neighbourhood location and surrounding land uses, it is considered that the proposed density should be increased.

Further to the above as set out in Appendix 2 of the Compact Growth Guidelines the net site area must include:

- Local Streets as defined by Section 3.2.1 DMURS
- private and semi-private open space
- Car parking, bicycle parking and other storage areas
- Local parks such as neighbourhood and pocket parks or squares and plazas
- All areas of incidental open space and landscaping.

2. Design and Layout

(a) Schedule of accommodation to include all apartments showing compliance with Appendix 1 of the Apartment Guidelines

(b) Planning Statement should include the following:

- Breakdown of bike parking per use and include for staff figures associated with creche and medical centre
- Rationale and justification for the number of car parking spaces proposed
- Rationale and justification for the proposed density

(c) The Planning Authority maintains its concerns in relation to the external balconies. The applicant is requested to submit revised design with any future planning application for the inclusion of internal balconies on all external elevations. The use of external balconies are considered appropriate overlooking the courtyards.

3. Ecology

- a) The foundations of the buildings may require mitigation to prevent uncured concrete coming into contact with water.
Assessment of same should be included for within the NIS.
- b) Despite the habitats on site not being optimal for amphibians, frogs will use water bodies as small as puddles in which to breed and deposit spawn. The proposal should consider using "sub-optimal" in the reports rather than "unsuitable" in this regard.
- c) Include for the use of tallest possible tree species to prevent light spill from tall buildings into the Groody Valley.
- d) The use of any non-native species capable of self-spread into the wider environment is not permissible.
- e) A survey for opposite leaved pondweed in the open drain that is proposed for infill must be completed.

- f) Any trees on site proposed to be felled, that have any bat roost potential must have a bat survey and if required, derogation licence prior to removal
- g) The development should provide for the inclusion of a stand alone bat house designed to include features for LHB as a welcome enhancement measure
- h) Swift bricks and other habitat enhancement measures included are welcome

4. Active Travel

- a) Section 11.8.7 of the Limerick Development Plan (2022-2028) concerns end of journey cycling facilities that are considered critical to support modal shift. To encourage the use of slower modes provision should be made for lockers and showers in the crèche and medical centre.
- b) All short term bike storage solutions should be close to the access /egress of the building it is intended to serve for security reasons.
- c) The breakdown of long term secure bike storage (570 spaces in the basements) was stated at 80% racking, with 20% Sheffield type stands. This ratio for residential development is too high for racking. The site is not constrained in terms of area, bike storage should be accessible to all, racking can be noisy and is better suited to non residential uses. The maximum percentage of racking as a secure bike storage solution should be 50%, with provision for non standard bike storage including cargo bikes, scooters and EV charging for electric bikes.
- d) The creche and medical centre should also provide for non standard bikes.
- e) A covered parent drop area for the crèche is required, the relocation of the bike storage from the opposite side of the service road is noted. A covered and secure structure for crèche staff to store bikes is also required if not internalised within the building, the same for the proposed medical centre.
- f) The lack of a dedicated cycle lane along the main service road from the new junction with the Dublin road to the bottom of the site (from the left in left out junction) is a missed opportunity. The width of the green pedestrian and cycle travel route as shown on the active travel map should be a minimum of 3 meters in width (no dimension is shown).
- g) The pedestrian crossing at the new left in left out junction with the Dublin road is too far from the junction, it will not be used by pedestrians. Pedestrian priority is required through this junction, with a raised entry level detail. Exact details to be agreed with the roads section and active travel.

5. Roads

The following documentation should be submitted with any future LRD Planning Application:

- a) A Stage 1 Road Safety Audit shall be completed and submitted in accordance with TII Publication 'Road Safety Audit GE-STY-01024'.
- b) The Applicant shall address all problems raised with the Stage 1 Road Safety audit in full and submit revised Site Layout Plans to include the recommendations of the Audits, which must be clearly labelled for acceptance by the Planning Authority.
- c) The Applicant shall submit details of the proposed Audit Team

- d) The road marking shown at the pedestrian crossing points are reserved for controlled crossing. If it is not the intention to have controlled crossings then these should be revised.
- e) The Road Section requires a physical raised traffic island at the proposed new entrance to the R445 to allow for left and left out only and to prevent drivers from attempting to turn right out of the entrance.
- f) The 'STOP' road markings shown inside the entrance off the existing roundabout have the potential to cause queuing issues at the R445. Please address
- g) This is an LRD proposal, which is comprising of 403 No. apartments, a creche and a medical centre. The Road Section is not in agreement with the proposed Taking in Charge Map; we believe all this development would be managed by a Management Company and not taken in charge by Limerick City and County Council.
- h) Show directional signage so that the blocks and numbers can be found.
- i) Show advanced ramp signage.
- j) Show fully dimension layout.
- k) Address footpath overhang at perpendicular parking (preferably by widening footpaths) again clearly show on Engineering Layouts, especially Road Signage & Markings Layouts.
- l) Provide house numbering signage: location, ornate design, dimensions, and mounting method.
- m) Provide utility ducting layout for. broadband (100mm uPVC, connected to each unit).

Electric Vehicle (EV) Infrastructure:

- a) Minimum 20% of parking spaces to have functioning EV chargers.
- b) Remaining spaces to be ducted for future EV installation.
- c) Accessible and EV bays must not use permeable paving (due to painting requirements).

Additional Requirements:

- a) Footpath is required around the public realm spaces.
- b) Include footpaths around EV spaces.
- c) Revise road cross section: surface course to be 40mm of 10mm SMA Surf.
- d) 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.
- e) Set down could affect sightlines.
- f) Pedestrian routes need to be clearer.

6. Landscaping/Boundaries/Public Open space

Confirm compliance with the requirement of 10-15% of public open space. Landscape drawing should include all areas of open space – private, communal etc and include square meterage and detailed sectioned drawings taken from a number of points through each area of open space should be provided to demonstrate usability.

7. Lighting Arrangements

Please submit a lighting design fully in line with Limerick City and County Council's Public Lighting Specification (2022):

- i) Must show lux levels. The average lux of 7.5w does not appear to be achieved.
- ii) Submit warranties.
- iii) Revised luminaire choices.

8. Surface Water & SuDs Management Plan

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

- a) Accessible and EV bays must not use permeable paving (due to painting requirements).
- b) Submit photographs of the condition of the open drain to which this development will discharge to.
- c) Include for a Kiosk to house the messaging system and alarm Class 1 By Pass interceptor and show vent stack.
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- e) Submit revised Surface Water Calculation Document.
- f) Submit a revised Surface Water and SuDS Layout Plan showing finished floor levels on same drawing so that the freeboard of the finished floor levels can be examined.
- g) Reconsider the use of diffusers. There are concerns that they may easily silt up. Show the public realm permeable paving connected with access chambers for maintenance and with overflow system to the main internal surface water pipeline.
- h) Improve clarity of the layout plans—vent stacks and alarm/messaging units for interceptors are difficult to locate.
- i) Submit a Stage 1 Storm Water Audit.

9. Part V

If there are any changes to the number of apartments proposed, the applicant is requested to contact the Housing Department directly in relation to Part V provisions associated with the development. An agreement in principle letter shall be submitted with any future planning application.

10. Letters of Consent

A Pre-connection enquiry with Uisce Eireann shall be carried out and a confirmation of feasibility shall be submitted with any future LRD planning application.

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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,



(for) Senior Planner,

Planning Development