



CHARTERED TOWN PLANNING CONSULTANCY

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RESPONSE TO LRD OPINION

LCCC LRD Pre-Application Ref. 1069749

Proposed Purpose-Built Student Accommodation
on a site between Lady's Lane and Hunts Lane off Dominick Street, Limerick

On behalf of Lanehunt Ltd.
July 2026

Document Control

Title	Response to LRD Opinion
Project	Purpose-Built Student Accommodation, between Lady's Lane and Hunts Lane off Dominick Street, Limerick
LRD Pre-Application Ref.	1069749 (LRD Opinion dated 29 May 2026)
Prepared for	Lanehunt Ltd.
Prepared by	Adam Kearney BA MA MIPI MRTPI, AK Planning & Development Ltd
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Date	July 2026

1.0 Introduction

This report addresses the specific information requirements and issues raised by Limerick City and County Council (the Planning Authority) in its Large-scale Residential Development (LRD) Opinion issued on 29 May 2026 under Ref. 1069749, in relation to a proposed Purpose-Built Student Accommodation (PBSA) development on a site between Lady's Lane and Hunts Lane off Dominick Street, Limerick, comprising the partial demolition of the former Tait Centre building and the construction of a single six-to-eight-storey building providing 350 student bedspaces in 51 clusters, with associated communal amenities, active ground-floor uses, cycle parking and public-realm works, on a car-free basis.

The Opinion was issued in accordance with section 32D of the Planning and Development Act 2000 (as amended), following pre-application consultation with the Planning Authority. The Authority advised that the documentation submitted required further consideration and amendment to constitute a reasonable basis on which to make an application for permission, and specified eleven items of information to be submitted with any application.

It is considered that each of the eleven items included in the LRD Opinion has been comprehensively addressed, as detailed in the response below. This document should be read in conjunction with the accompanying Planning Report and Statement of Consistency (AK Planning & Development Ltd), which demonstrates the consistency of the proposal with the Limerick City and County Development Plan 2022–2028 and the relevant Section 28 Ministerial Guidelines, and with the supporting reports and drawings prepared by the design team and specialist consultants, as cross-referenced throughout.

2.0 Information to be Submitted with the LRD Application

Pursuant to article 16A(7) of the Planning and Development Regulations 2001 (as amended), the Planning Authority notified the prospective applicant that, in addition to the standard requirements specified in articles 20A, 22 and 23, the specific information set out below should be submitted with any application for permission. Each item of the Opinion is reproduced (in summary) and addressed in turn.

2.1 Item 1 – Building Height

Requirement	Response
The application shall be accompanied by a robust assessment of the proposed development against the Building Height Strategy for Limerick City, having particular regard to Policy TB6 (Assessment of Tall Buildings), demonstrating how the proposal accords with the relevant tall-building classifications, recommendations, high-level principles, the Localised Assessment Tool for the relevant character area, and the criteria for the assessment of tall buildings.	A standalone Building Height Assessment prepared by AK Planning & Development Ltd accompanies the application. It classifies the proposal as a 'Taller Building' (the lowest tall-building classification) within the Newtown Pery Character Area and assesses it against Policy TB6, the Tall Building Recommendations for the Character Area, the Tall Buildings High-Level Principles, the Newtown Pery Localised Assessment Tool and the criteria at Policies TB7 and TB8. The Assessment concludes that the proposal accords with the Strategy, subject to the heritage-led design response described, and is supported by the An Bord Pleanála decisions ABP-317797-23 and ABP-317609-23 on comparable sites within the Character Area. The Building Height Assessment is accompanied by, and cross-refers to, the Architectural Heritage Impact Assessment (Pat McSweeney MSc MRIAI, RIAI Grade 2 Conservation Architect, July 2026) and the Pedestrian Wind Environment Statement (Windtech Consultants, 23 July 2026), which respectively confirm a negligible impact on the setting of the nearby protected structures and the adjoining Architectural Conservation Area, and safe and comfortable pedestrian wind conditions at street level and within the amenity areas.

2.2 Item 2 – Roads Requirements

	Requirement	Response
(a)	A Stage 1/2 Road Safety Audit must be completed and submitted in compliance with TII Publication 'Road Safety Audit GE-STY-01024'.	A Stage 1/2 Road Safety Audit (Roadplan, No. 26125-01-001), prepared in accordance with TII Publication GE-STY-01024, has been completed (Final, 21 July 2026) and accompanies the application.
(b)	Address all problems raised in the Stage 1/2 Audit in full and submit revised Site Layout Plans incorporating the Audit recommendations, clearly labelled.	The recommendations of the Road Safety Audit have been addressed and are reflected and clearly labelled on the revised Site Layout Plans submitted with the application drawings.
(c)	Ground Floor Plan cobble laneway with outdoor seating and crossing: extend the	The engineering and architectural drawings extend the existing footpath along Lady's Lane

	Requirement	Response
	Lady's Lane footpath (min. 2 m) to the build-out; show double yellow lines; shared surfaces do not include footpaths; include tactile paving at the crossing; and submit a detailed cross-section and specification for the cobble laneway.	to the DMURS minimum of 1,800 mm, show double yellow line markings and tactile paving at the crossing, and provide a detailed cross-section and specification for the cobble laneway. For clarity, and in response to Item 11, the café outdoor seating has been removed from the application; the 2 m build-out sought at the seating area therefore no longer arises, and the footpath and public-realm treatment are provided in accordance with DMURS. The 1,800 mm width follows the Stage 1/2 Road Safety Audit and is shown on drawing 26008-BDB-XX-XX-DR-CE-0009.
(d)	Show Hunts Lane to be fully reconstructed due to the number of services to be laid, with a detailed cross-section and specification from Dominick Street to where the service commences.	The drawings show the full reconstruction of Hunts Lane, with a detailed cross-section and specification from Dominick Street, to accommodate the services to be laid.
(e)	The application shall be accompanied by a swept-path analysis for fire and bin services, or details of how these can access the development.	A swept-path analysis for fire tender and refuse vehicle access accompanies the application within the engineering drawings.
(f)	As the red-line boundary includes areas outside the ownership of the applicant, letters of consent from relevant landowners shall be submitted.	Letters of consent from the relevant landowners are submitted with the application (Consent from Owners).

2.3 Item 3 – Laneways

	Requirement	Response
(a)	Any paving proposed on Lady's Lane must tie into the Limerick Laneways Project (guided by the Limerick Laneways Toolkit and the draft Public Realm Strategy); the application should include design details and material finishes; and DMURS must be followed for all road/footpath/pedestrian areas.	The laneway design ties into the Limerick Laneways Project and has been prepared having regard to the Limerick Laneways Toolkit and the draft Public Realm Strategy, with DMURS applied throughout. Design details and material finishes are provided in the landscape and public-realm drawings.
(b)	The minimum width of existing footpaths in public areas must be increased to align with DMURS, i.e. 1,800 mm minimum installed as standard.	Existing public footpaths are increased to the DMURS minimum of 1,800 mm as standard, as shown on the engineering and landscape drawings.
(c)	The planting strip on Lady's Lane must be installed in accordance with the 'Implementation of Urban Nature-based Solutions Guidelines'.	Planting to Lady's Lane is provided in accordance with the Implementation of Urban Nature-based Solutions Guidelines, as detailed in the landscape drawings.
(d)	The applicant is advised that a supplementary development contribution may be associated with works to the laneways; further discussions should be had with the Planning Authority.	Noted. The applicant will engage with the Planning Authority in relation to any supplementary development contribution associated with the laneway works.

2.4 Item 4 – Lighting Arrangements

	Requirement	Response
(a)	The luminaires proposed do not currently demonstrate compliance with the Council's Public Lighting Specification (particularly warranties and certification); a revised Public Lighting Design shall be submitted, fully compliant, addressing Lady's Lane and Hunts Lane.	A revised Public Lighting Design is provided within the Building Services and External Lighting Report (Renaissance Engineering / Veelite Lighting), which fully complies with the Council's Public Lighting Specification, including manufacturer/labour warranties and certification, and addresses the lighting arrangements for Lady's Lane and Hunts Lane.
(b)	Where existing public lighting infrastructure is retained/utilised, it shall be clearly identified, and supporting documentation shall confirm its suitability, compliance and certification, including warranty requirements.	Any retained existing public lighting infrastructure is clearly identified on the design drawings, and the supporting documentation confirms its suitability, compliance and certification status, including warranty requirements.

2.5 Item 5 – Surface Water & SuDS Management Plan

	Requirement	Response
(a)	Submit a revised Surface Water and SuDS Management Plan including proposed and existing Finished Floor Levels (FFLs) to compare with the Surface Water Calculation Document and establish sufficient freeboard, fully compliant with the Council's Surface Water and SuDS Management Plan.	A revised Surface Water and SuDS Management Plan is provided within the Engineering Services and Surface Water Management Report (BDB Consulting). Existing and proposed Finished Floor Levels are clearly indicated on the drawings and in the report (existing FFL 14.300 m OD), demonstrating that sufficient freeboard is achieved, fully compliant with the Council's specification. A detailed response to this item was provided by BDB Consulting on 10 June 2026.

2.6 Item 6 – Construction Management and Delivery Plan

Requirement	Response
Submit a detailed Construction Management and Delivery Plan.	A detailed Construction Management and Delivery Plan (Stewart Construction T/A JSL Group, Revision 1, 8 April 2026) accompanies the application, addressing construction traffic and access, working hours, phasing, hoarding, dust, noise and public-safety management during the construction period.

2.7 Item 7 – Verified Views

Requirement	Response
It is considered that the verified views do not adequately illustrate the potential visual impact on the settings of Colbert Station and the Railway Hotel, both protected structures; the applicant shall submit additional verified view photomontages to	Additional verified view photomontages (FR Studios, Photomontages, Issue 01, 21 July 2026) are submitted which illustrate the potential visual impact on the settings of Colbert Station and the former Railway Hotel, both protected structures.

Requirement	Response
address these impacts.	The photomontages are prepared to recognised verified-view methodology and present each viewpoint as Existing, Proposed, and Proposed with Permitted development. The setting of Colbert Station is illustrated in the Colbert Carpark view (PM06, looking north-north-west), and the setting of the former Railway Hotel in the Parnell Street views (PM03, looking north-north-west, and PM04, looking south-west). The photomontages are cross-referenced in the Building Height Assessment and the Architectural Heritage Impact Assessment (Pat McSweeney, July 2026), which concludes that the visual impact on the settings of these protected structures is negligible.

2.8 Item 8 – Environmental Impact Screening

Requirement	Response
The applicant shall submit an Environmental Impact Screening, which shall include Schedule 7 information.	An Environmental Impact Assessment Screening Report, including the information specified in Schedule 7 of the Planning and Development Regulations 2001 (as amended), accompanies this application (Teire Consulting, July 2026) to enable the Planning Authority to make a screening determination.

2.9 Item 9 – Ecology

	Requirement	Response
(a)	An Ecological Impact Assessment shall be submitted outlining wildlife usage of the site, including birds and bats.	An Ecological Impact Assessment (Teire Consulting, Project No. 260036, Version 1.1, 24 July 2026) accompanies the application, outlining wildlife usage of the site including birds and bats.
(b)	If a bat derogation licence from the NPWS is required, it shall be submitted with any future planning application.	Two dusk emergence bat surveys were undertaken at the existing buildings (25 May and 16 June 2026). No bats were recorded emerging and no bat roost was identified; bats are therefore not a Key Ecological Receptor. As no roost is present, no NPWS derogation licence is required.
(c)	The application shall include the incorporation of bird boxes.	Bird boxes (and bat roosting features) are incorporated into the development, as detailed in the landscape and architectural drawings.
(d)	Consideration should be given to the use of suitable native tree and shrub species of Irish provenance, per the list in Conserving Wildlife in Towns and Villages (Heritage Council, 2005).	Native tree and shrub species of Irish provenance are incorporated in suitable locations within the landscape design, having regard to the species list in Conserving Wildlife in Towns and Villages (Heritage Council, 2005).

2.10 Item 10 – Daylight/Sunlight Analysis

Requirement	Response
The Planning Authority is not satisfied that the daylight assessment has adequately considered the impact on existing residential properties fronting Dominick Street between Lady's Lane and Hunts Lane, where rear-facing windows appear to serve habitable rooms; a revised Daylight/Sunlight Assessment shall be submitted which fully assesses this impact, including all relevant rear-facing habitable-room windows and associated residential amenity, having regard to Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice.	A revised Daylight and Sunlight Assessment (H3D, 9 July 2026) is submitted which fully assesses the impact of the proposed development on the existing dwelling at 2 Dominick Street, fronting Dominick Street between Lady's Lane and Hunts Lane, including its rear-facing windows and associated residential amenity, having regard to BRE 209 / Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice. The assessment confirms that the proposed accommodation itself achieves an excellent level of daylight and sunlight (100% of assessed rooms meeting the BS EN 17037:2018 target illuminance and 51 of 51 living-room windows meeting the sunlight recommendations). In respect of the existing dwelling, while 3 no. windows fall below the 27% VSC guideline, the room served passed the BRE No Sky Line (daylight distribution) test (no-sky-line area retained at 100%; ratio 1.00, exceeding the 0.8 threshold), such that the assessment concludes the daylighting of the adjacent property would not be adversely affected in accordance with the BRE Guidelines.

2.11 Item 11 – Café

Requirement	Response
The outdoor seating area associated with the café should not form part of this planning application; as the laneway is not in the ownership of the applicant, a tables-and-chairs licence under section 254 would be required.	The outdoor seating area associated with the café has been removed from the application. As the laneway is not in the ownership of the applicant, any such use would be the subject of a separate tables-and-chairs licence under section 254 of the Planning and Development Act 2000 (as amended).

2.12 Advice Note

The Planning Authority advised that the Letter of Opinion is valid for six months and that, under sections 32E and 247(3) of the Planning and Development Act 2000 (as amended), the carrying out of pre-application consultations and the provision of an LRD Opinion do not prejudice the performance by the Planning Authority of its statutory functions and cannot be relied upon in the formal planning process or in legal proceedings. This is noted and acknowledged.

3.0 Conclusion

Each of the eleven items raised in the Planning Authority's LRD Opinion (Ref. 1069749) has been comprehensively addressed, as set out above and evidenced by the accompanying suite of reports and drawings prepared by the design team and specialist consultants. This document should be read in conjunction with the Planning Report and Statement of Consistency and the supporting documentation submitted with the application.

It is respectfully submitted that the application, as now constituted, fully addresses the matters raised in the LRD Opinion and provides the Planning Authority with all of the information necessary to assess the proposed development.

Compiled by:

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On Behalf of Lanehunt Ltd

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Appendix A – Letter of Opinion (Ref. 1069749)

The Planning Authority's Letter of Opinion of 29 May 2026 (LRD Pre-Planning Ref. 1069749) is reproduced in full below. The applicant's response to each item is set out in Section 2 above. Location: site located between Lady's Lane and Hunts Lane off Dominick Street, Limerick.

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

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

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

1. Building Height

The application shall be accompanied by a robust assessment of the proposed development against the Building Height Strategy for Limerick City, having particular regard to Policy TB6: Assessment of Tall Buildings. This assessment should clearly demonstrate how the proposal accords with the relevant tall building classifications, recommendations, high-level principles, the Localised Assessment Tool for the relevant character area, and the criteria set out for the assessment of tall building.

2. Roads Requirements

(a) A Stage 1 / 2 Road Safety Audit must be completed and submitted in compliance with the TII Publication 'Road Safety Audit GE-STY-01024'.

(b) Address all problems raised with the Stage 1 / 2 Audit in full and submit revised Site Layout Plans to include the recommendations of the Audit, which must be clearly labelled.

(c) The proposed Ground Floor Plan shows a cobble laneway with the inclusion of an outdoor seating area and crossing point from café entrance to the opposite side to the existing footpath. This will require: extend the existing footpath along the front of the building along Lady's Lane to meet the proposed build-out area for outdoor seating (the width of the footpath shall be determined by the carriageway and should be a minimum of 2m); show double yellow line markings; shared surfaces do not include footpaths (please address); include tactile

paving at the proposed crossing point from café entrances to the opposite side to the existing footpath; and submit a detailed cross section showing construction build-up with clear specification of the proposed cobble laneway area.

(d) Show Hunts Lane to be fully reconstructed due to the number of services to be laid. Include a detailed cross section with clear specification from Dominick Street to where the service commences.

(e) The application shall be accompanied by a swept path analysis for fire and bin services or details in relation to how same can access the development.

(f) As the redline boundary includes areas outside the ownership of the applicant, letters of consent from relevant landowners shall be submitted.

3. Laneways

(a) Any paving that is proposed on Lady's Lane will need to tie into the overall scheme for the Limerick Laneways Project, which is taking guidance from both the Limerick Laneways Toolkit and Guidance, and the Public Realm Strategy (Draft). The application should include design details and material finishes of the Laneways. The Design Manual for Urban Roads & Streets (DMURS) must be followed for all road/footpath/pedestrian etc. areas being designed.

(b) The minimum width of existing footpaths in public areas must be increased to align with DMURS, i.e. 1800mm minimum must be installed as standard.

(c) The planting strip on Lady's Lane must be installed in accordance with the 'Implementation of Urban Nature-based Solutions Guidelines'.

(d) The applicant is advised that a supplementary development contribution may be associated with any works to the laneways. Further discussions on same should be had with the Planning Authority prior to any future planning application being lodged.

4. Lighting Arrangements

(a) The luminaire(s) proposed do not currently demonstrate compliance with the requirements of Limerick City and County Council's Public Lighting Specification, particularly in relation to the provision of appropriate manufacturer / labour warranties and certification. Accordingly, a revised Public Lighting Design shall be submitted. The revised design shall fully comply with Limerick City and County Council's Public Lighting Specification and shall specifically address the lighting arrangements for Lady's Lane and Hunts Lane.

(b) Where it is proposed to retain and/or utilise any existing public lighting infrastructure, this shall be clearly identified within the design drawings. Supporting documentation shall explicitly confirm the suitability, compliance, and certification status of such existing infrastructure, including confirmation that all retained elements meet current specification and warranty requirements.

5. Surface Water & SuDS Management Plan

(a) Submit a revised Surface Water and SuDS Management Plan that includes the proposed and existing Finished Floor Levels (FFL) to compare with the Surface Water Calculation Document to establish if sufficient freeboard has been achieved. Drawings and all associated supporting documentation shall be fully compliant with Limerick City & County Council's Surface Water and SuDS Management Plan.

6. Construction Management and Delivery Plan

Submit a detailed Construction Management and Delivery Plan.

7. Verified Views

It is considered that the verified views do not adequately illustrate the potential visual impact on the setting of Colbert Station and the Railway Hotel which are both protected structures. As such the applicant shall submit additional verified view photomontages to address these impacts.

8. Environmental Impact Screening

The applicant shall submit an Environmental Impact Screening and which shall include Schedule 7 information.

9. Ecology

(a) An Ecological Impact Assessment shall be submitted which should outline wildlife usage of the site including bird and bats.

(b) If a bat derogation licence from the NPWS is required, same shall be submitted with any future planning application.

(c) The application shall include the incorporation of bird boxes.

(d) Consideration should be given to the use of suitable native tree and shrub species of Irish provenance. These could be used in suitable locations in the development. A list of suggested species appears on page 6 of the publication Conserving Wildlife in Towns and Villages (Heritage Council 2005).

10. Daylight/Sunlight Analysis

The Planning Authority notes the conclusions of the Daylight / Sunlight Analysis submitted with the application, wherein it is stated that no living spaces are located in close proximity to the proposed development, with the exception of the permitted development to the south-east, and that, on this basis, a daylight assessment was not required. However, the Planning Authority is not satisfied that this assessment has adequately considered the potential impact of the proposed development on existing residential properties fronting onto Dominick Street between Lady's Lane and Hunts Lane, where rear-facing windows appear to serve habitable rooms. In this regard, the applicant is requested to submit a revised Daylight / Sunlight Assessment which fully assesses the impact of the proposed development on the existing

dwelling in this location, including all relevant rear-facing habitable room windows and associated residential amenity, having regard to the guidance set out in Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice and any other relevant standards.

11. Café

The outdoor seating area associated with the café should not form part of this planning application. As the laneway is not in the ownership of the applicant, a tables and chairs license under Section 254 would be required.

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, Limerick City and County Council.