

# Submission Details

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## Submitter

Name	Sarah Mulcahy
Address	Baunacloka Mungret Limerick
Note	

## In relation to application

Application Number	PT8LL161
Applicant Name	Limerick City and County Council
Development Address	Ballycummin Road Raheen

## Part 8

Application number PT8LL161, 20 no housing units on Ballycummin Road Raheen.  
I wish to make a submission for the current part 8 consultation.

- No Community engagement by LCCC with residents/ businesses within the area prior to part 8 consultation/planning. Other Local authorities have had public engagement with residents in the area.
- Protected structures in the vicinity, as per Limericks Development Plan, this proposed development is adjacent to RPS Reg 1669 (St. Nessian's Church), Reg 1668 (former parochial house), Reg 1670 (Barry's Raheen)
- This proposed development would adversely impact character of area & it would set an undesirable precedent to development in foregrounds of protected structures, which materially contravenes development plan.
- The planning files state this will be a 3 storey building on one wing & 5 storey building elsewhere. There are no 5 storey buildings currently in the area. The drawings attached to this planning file show the overpowering impact this development would have on the surrounding area. The visual impact, height should complement natural features etc., CGR09 of development plan deals with building height.
- Significant impact arising from development/demand on amenities in the area which are not adequate/ impact on existing properties in the vicinity.  
The Density is 87 units per ha which is almost double the development plan of 45 units per ha. There is a lack of amenities in the area. The open space recommended on development plan is 10% of development which in this case would equate to 256 sqm, the communal open space to south appears to be 237 sqm according to attached documents which is below the recommended amount, other private developers have been held to accommodate this need by LCCC so why is this application not treated the same?
- Drinking/ potable water supply – the existing water connections in the area are under demand and at times the pressure is affected, not to mention the additional demand of tankers carrying water to other towns (on behalf of LCCC/Irish water).  
According to a map attached to this planning there is a watermain within the site proposed boundary. What impact will this have to existing water supplies? Is there adequate supplies / pressure available to facilitate 20 additional units? Are upgrades required?
- Sewage facility with Irish water, is there capacity? Is there upgrades required? This system is under pressure & smell of sewage emanates around Raheen Church / South court roundabout etc. There is massive sewage issues as a result of the St Necessans Active travel works (by LCCC). Capacity issues from Raheen Industrial Estate & hundreds of existing houses in the area. Residents within housing developments adjacent to St Necessans active travel works have raised concerns with LCCC.
- Development plan HO04 -reuse of existing buildings. There are many buildings within Limerick city & urban areas which are not in use. No report supplied with this planning application to state the need for this development & that other existing buildings within Limerick are not usable. LCCC have lots of vacant properties which could be reused, some even for sale on behalf of LCCC within prime city centre locations.
- The AA screening report does not have any mention of Loughmore Common (pNHA) NPWS site code 000438 located within a short distance of proposed development. LCCC own website under biodiversity mentions Loughmore Common. It also mentions "Limerick's natural environment is under significant threat. For freshwater species, major threats include the over-extraction of water, pollution caused by agricultural, forestry, industrial and domestic effluents and the introduction of alien species. Other major threats come from changes in water quality, farming intensification and afforestation, urbanisation

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and tourism, and the consumptive use of natural resources. Climate change, acidification and eutrophication is also damaging the environment. Ireland as an EU Member State has committed to halting biodiversity loss. The Local Authority is dedicated to safe-guarding natural heritage as it is a non-renewable asset that this generation is morally obligated to pass on in a sustainable manner to future generations” EH03 of development plan states ecological impact assessment to be carried out, it mentions opposite leaved pond weed, this is present in Loughmore Common. pNHA are subject to limited protection in the form of recognition of ecological value of pNHA by Planning & Licence Authorities according to NPWS website.

- No ground investigations have been completed for this planning application, at least not available under the application, apart from the utilities study.
- Under the Water Framework Directive groundwater must be assessed. No assessment available under this planning application of groundwater. Groundwater is used to supply water for drinking, agriculture & industries. It helps maintain healthy water ecosystems. Many human activities if not managed correctly can lead to pollution of groundwaters (eg pesticide use, chemical spills, leakage of sewage and discharges) Groundwater is important both as a drinking water source and as a pathway to surface water, and for ecosystems. Limerick City and County Council have a very poor record in the protection of groundwater, based on our experience. The groundwater must be assessed for compliance with the Water Framework Directive on this development.
- Industries in the Raheen Business park engage in water abstraction. Contamination has been detected in water abstraction adjacent to this site. The effects of water abstraction on the environment must be included in the ground water assessment for this development.
- LCCC intend to discharge stormwater directly to ground in this development. The documents do not include any information on the geology of the site. EH09/6.3.4 of development plan sets out A karst base layer is present in much of this part of Limerick and drainage features such as turloughs are also present. Karst limestone is common in the area. How can the local authority decide to discharge to ground without information on the geology of the site? This approach would not be tolerated by a private developer. EH015 of development plan states LCCC objective is to protect ground and surface water resources.
- The Raheen Business Park has an aged infrastructure where there are misconnections between foul and storm, damaged pipes, and chambers. Some works were carried out to rectify some issues. The integrity of the storm and foul networks has been compromised as shown in CCTV surveys. In some footage the foul sewer was cleaner than the Stormwater sewer. This information is in the possession of LCCC and must be included in the ground water assessment.
- There is a long running investigation into discharges to stormwater from the Raheen Industrial Estate. A report by an Environmental Consultancy which LCCC has possession of has found hazardous substances are being discharged to stormwater. These hazardous substances are discharged directly to groundwater due to the unique geology of the outfall. The outfall is in the vicinity of this development. There is a link to Drinking water supplies from groundwater.
- EH022 of development plan commercial & industrial noise, given the proximity to Raheen Business Park & the mention in planning files of Analog noise being 75db. According to studies anything above 60db quality of life and sleep is affected. No mitigation measures are mentioned in planning documents.
- Removing car spaces – these spaces are actively used by people using Raheen church and are often full. What alternative will be provided for these spaces? If no alternative provided then double parking will happen outside houses etc & double parking on roadways making the road narrower & creating road safety issues.

- The traffic assessment which has an Oct 2024 date states some planning applications (section 3.3) that were granted, there are currently active plannings which will add to traffic which was not accounted for. There is also no mention of the planning application 218000 planning for houses at the rear of Mungret College 253 residential units along with a crèches community facility & café etc, the site was given to LDA by LCCC who acquired the lands as part of Mungret college folios. The housing development located beside this was mentioned (211216& 211217). No mention of current planning application for housing units under appeal in the area – planning ref 22841 for 96 residential units & crèche. That is 349 residential units omitted from this report on just 2 planning references. There are other planning developments either currently in planning or in the planning line in the area. Cumulative impact needs to be reviewed. Also 4.3 of traffic assessment where is ballycumber road?
- Will services to local businesses in the area be affected by this development? Will any traffic implications affect the local businesses?
- Planning conditions- who is going to monitor & enforce planning conditions? LCCC are effectively applying to themselves for planning permission. Local authorities are responsible for planning condition enforcements. I have personal experience with LCCC planning enforcement whereby conditions are not met & planning legislation not followed & LCCC planning team has been slow to give out even a reference number –as per planning legislation where a representation in writing is made to a planning authority by any person the local authority shall issue a warning letter as soon as possible but not later than 6 weeks after receipt of representation, I have first hand experience of not being able to get a reference or case number within 6 weeks from Planning. Also I have experience where concerns were not followed up. In one instance I had submitted a query in July 2024 to planning of LCCC & did not receive any update or response until I sent a follow up in Oct 2024. Councillors raised concerns over planning conditions being enforced in metropolitan meetings & local newspapers reported on this.

Should you have any queries on any of the points I made please feel free to reach out to me for further clarification or information.

Kind Regards,  
Sarah Mulcahy