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An Coimisiún Pleanála
64 Marlborough Street
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By email: laps@pleanala.ie

03rd March 2026

RE: Response to Third Party Submissions – ACP-323849-25

Limerick City and County Council in partnership with Limerick Twenty Thirty Strategic Development DAC - The proposed development is for a mixed use development that seeks the regeneration and adaptive reuse of a strategic brownfield site as part of the Limerick City and County Council 'World Class Waterfront" revitalisation and transformation project, at Cleeves Riverside Quarter in the townland of Farranshone More in Limerick City.

Dear Sir / Madam,

HRA Chartered Town Planning & Environment Consultants, 3 Hartstonge Street, Limerick City, has been retained by Limerick City and County Council in partnership with Limerick Twenty Thirty Strategic Development DAC (hereon in referred to as "*the applicant*") to prepare this response to your letter dated 23rd January inst., and subsequent email dated 03rd February inst. and to provide a response to the 39 no. third-party submissions enclosed with same.

All submissions have been read in full and have been considered thematically with reference to the issues raised. The applicant respectfully requests that An Comisiún Pleanála ("the Commission") takes into account this response in its assessment of and deliberation on the Section 175 and 177AE Application for Approval.

1.0 SUMMARY APPRECIATION OF THE APPEAL SUBMISSIONS

In order to avoid undue duplication, it is proposed to group the submissions into themes and to holistically address all issues on a thematic basis. The identified themes with the issues raised by third parties are detailed in Table 1.0 with each theme identified in detail in Section 2.0 of this Statement.

Table 1.0 Thematic Grouping of Third Party Submissions			
No.	Submissions	Theme	Issues Raised
1.	University of Limerick	Letters of Support	▪ Additional homes in city centre location seeks to address existing housing shortage, supports local workforces and attracts skilled labour. ▪ Lack of suitable city centre accommodation is a serious barrier to investment. ▪ There is a target market for lower car dependency accommodation. ▪ PBSA supports local educational institutions and strengthens the student population and relationship between industry and higher education ▪ Strengthen the attractiveness of Limerick as a location for investment. ▪ Seeks to redevelop a significant heritage site which has long been neglected. ▪ Breathe new life into a historic location and site, enhancing the physical fabric of the city. ▪ Significant social and placemaking benefits with space for cultural and community events. ▪ Generate significant employment during construction. ▪ Welcomes the sustainable aspects of the development including green infrastructure, energy efficient design and biodiversity habitats.
2.	Treaty Stone Partnership		
3.	Technological University of the Shannon		
4.	Limerick Civic Trust		
5.	Limerick Chamber		
6.	Limerick & Clare Education & Training Board		
7.	Aughinish Alumina		
8.	An Garda Siochana		
9.	Johnson & Johnson Med Tech		
10.	Office of Public Works (OPW), Flood Project Management	Infrastructure Provision	▪ Reference to previous flood correspondence with Design Team ▪ Main consideration is how flood defences will be provided to support further development of the Cleeves site. The project team within LCCC working on the Flood Relief Scheme are best positioned to advise on this. ▪ Confirms Uisce Eireann Confirmation of Feasibility issued and recommends four standard measures during construction / operation.
11.	Uisce Eireann		
12.	Irish Wildlife Trust (Limerick Branch)	Botanical Surveys	▪ Conservation of Maidenhair Fern and deficiency in recording its presence on the site, its significance and in proposing mitigation measures to enable the plant to continue as a developing part of Limerick's flora. ▪ Error identifying Cranesbill, Geranium Sanguineum on the site
13.	Roger and Rose O'Brien	Architecture & Urban Design	▪ Massing Scale and Context Response ▪ Permeability and Legibility
14.	Marianne Fitzgibbon		
15.	Michelle Daly Hayes	Residential Amenity	▪ Height & Massing ▪ Overdevelopment ▪ Loss of Daylight & Sunlight
16.	Finbar and Jane Conlon		
17.	Shane Larkin		

18.	Sean & Jean Foley		▪ Loss of Residential Amenity / Overbearing Character ▪ Loss of Privacy and Overlooking ▪ Proximity to Housing in Clanmaurice and Inaccurate measurement from existing housing
19.	Mathilde Lamble and Stefan Lamble		
20.	Mary O'Dea and James Shivnan		
21.	Clanmaurice Residents Association	Heritage	▪ Loss of heritage through demolition – Fernbank House
22.	Colm Crowe	Transport & Access	▪ Incomplete TTA and inadequate Traffic Impact with respect to schools and capacity of Salesians roundabout ▪ Construction Traffic & Access not addressed ▪ Inadequate Parking Provision and removal of existing car parking spaces ▪ Mobility Plan ▪ Cumulative Impacts not assessed ▪ Absence of public transport infrastructure ▪ No emergency access provision and emergency access will be restricted to Stonetown Terrace ▪ No provision for management of deliveries to the site during operation.
23.	David & Grainne Sheehan		
24.	Willie Ryan & Aideen Ryan		
25.	John Hackett		
26.	Romanie van Son		
27.	Paul Lynam		
28.	N Hughes		
29.	James Keane		
30.	Rosie Cleary		
31.	Antonio Coppola		
32.	Catherne McMahon	Community Infrastructure	▪ Absence of Community Infrastructure ▪ Demolition of existing facilities including the Sports Hall at Salesians ▪ Sustainability and Social Infrastructure Statement is misleading in terms of walktimes
33.	Viviene Gabbett		
34.	Joe Murray		
35.	Maura Moore		
36.	Fernhill Development Association	Prematurity Phasing and Deliverability	▪ No confirmed development partner ▪ Uncertainty regarding deliverability
37	Hugh & Dorothy O'Sullivan		
38	Laurence Garric	Housing Mix & Student Demand	▪ Over provision of one and two bed houses ▪ Student Housing provision and lack of need
39	Gerard O'Neill		
		Environmental Impacts	▪ EIAR Accessibility ▪ Biodiverstiy Impacts ▪ Flood Impacts including flooding of Fernhill ▪ Construction Impacts ▪ Wind Tunnel Effect ▪ Contamination
		Public Consultation	▪ Lack of meaningful public consultation

1.1 Overview of Submissions

Submissions 13–39 have been received primarily from residents living around and adjoining the Cleeves site. These submissions raise a broadly similar set of concerns, summarised in Table 1.0, and a number of the submissions are identical in both scope and content.

In several cases, submissions focus on issues specific to individual dwellings, including separation distances, proposed building heights, potential overlooking, impacts on residential amenity, and the implications of the proposed reduced level of car parking on site. It appears that some submissions were prepared using information from public consultation events rather than the detailed planning drawings submitted to the Commission. For example, the submission made by Hugh & Dorothy O'Sullivan refers to an inaccurate measurement of 38 m between the proposed Salesians building and their property. This measurement appears to have been taken from a public consultation display board rather than from the planning documentation, which clarifies a separation distance of 7.4 m between the proposed Salesians building and the quarry wall only.

A number of submissions assert that necessary technical studies have not been undertaken, citing the absence of noise assessments, daylight and sunlight analysis, ecological assessments, conservation reports, and other environmental studies. A comprehensive Environmental Impact Assessment Report (EIAR), incorporating all of these assessments, was submitted with the application. It appears, however, that some parties may not have reviewed this material. Other submissions allege that the submitted studies are flawed, but provide no explanation or evidence to substantiate these claims or to identify specific inaccuracies.

Many submissions reference case law or previous planning decisions of An Coimisiún Pleanála (ACP). In most instances, however, the relevance of these precedents is neither explained nor supported with evidence. Where explanation is provided, the circumstances of the cited cases differ so fundamentally from those of the application site (e.g., references to Whateley Place, Dublin, versus a city-centre site in Limerick) that the quoted extracts from Inspector's Reports have no meaningful applicability.

Several submissions express dissatisfaction with the public consultation undertaken by the applicant, suggesting it was ineffective or insubstantial. It should be noted that such consultation is not a statutory requirement, but was carried out voluntarily and in good faith by the applicant to inform local residents and gather their views. Despite this engagement, and as reflected in the requested 'amendment conditions' submitted by some parties, it is clear that certain resident concerns, particularly in relation to height and density, could not be resolved. These include demands for a maximum height of three storeys within 30 m of existing residential boundaries and mandatory setbacks, which would conflict with both the site's zoning and national planning policy.

A number of submissions are premised on the assertion that the Cleeves site is not a city-centre location and is disconnected from the city core by the River Shannon. In reality, the site forms an integral part of the city centre, is zoned accordingly in the Limerick Development Plan 2022 – 2028 (with the exception of Stonetown Terrace) and is directly linked to the city core via Sarsfield Bridge. While it is acknowledged that the proposed development will result in at visual and perceptual change, the continuation of the existing status quo is neither viable nor consistent with planning policy for city centre lands. Although many submissions express support for development in principle, there is a clear disparity between the low-rise, low-density development preferred by some local residents and the requirements of national policy, which promotes increased density and taller buildings on well-located urban sites. It is this policy preference gap that appears to be generating much of the public opposition.

In contrast to the twenty-seven submissions that raise concerns about the proposal, Submissions 1–9 express clear support for the redevelopment of this significant heritage site, which has remained underutilised for many years. These submissions recognise the strategic importance of the project and highlight multiple benefits associated with its delivery, in particular the welcome provision of additional housing in a city centre location which will enhance Limerick's ability to attract and retain skilled labour. Several contributors emphasise that the current lack of suitable city centre accommodation is a recognised barrier to economic investment, and that the proposed development would help address this constraint.

A number of submissions highlight the broader economic and strategic benefits of the scheme, stating that it will enhance Limerick's attractiveness as a location for investment, while revitalising a prominent site of historical and cultural importance. The redevelopment is viewed as an opportunity to breathe new life into a historic part of the city, improving the physical fabric of the area and delivering substantial social and placemaking benefits. These include the creation of spaces capable of hosting cultural and community events, thereby contributing positively to civic life.

Significant consultation was undertaken with statutory bodies during the preparation of the Masterplan and the application for consent and this is reflected in Submissions 10 - 11 from the OPW and Uisce Eireann. Indeed the Commission will note that other statutory bodies were contacted and consulted with during the process, (as detailed in the Public Consultation Documentation and Chapter 4.0 of the EIAR) including the Built Heritage Unit and National Parks and Wildlife Services (NPWS) all of whom have influenced the approach to development on the site.

Submission no.12 from the Irish Wildlife Trust (IWT) highlights the presence of Maidenhair Fern on the site, which was acknowledged in the EIAR, Chapter 7.0 Biodiversity. It should be noted that this plant is not legally protected under the Flora (Protection) Order, 2015, but it is listed in the Ireland Red List No. 10 – Vascular Plants, and assigned a status of 'Least Concern'. Accordingly, its retention is desirable. Whilst the IWT identified this plant in 2022 at additional locations to those stated in the EIAR, their submission does not materially change the conclusions of the EIAR given that the majority of the substrate will be retained. The submission however does prompt acceptance that further measures could be considered to ensure that the epimural vegetation (including the maidenhair fern) on the site is protected.

1.2 Summation

Regeneration of the proposed development site is promoted at national, regional and local policy level, providing a solid plan led framework for its development. Cleeves is a strategic site which can deliver on 'compact growth' focusing on a more efficient use of land and resources through reusing previously developed and under-utilised land and buildings all in accordance with the policy objectives of the National Planning Framework (NPF).

The Regional Spatial & Economic Strategy (RSES) sees Cleeves and its redevelopment as a growth enabler for the city, a key fact also highlighted in a number of submissions in support of the development proposal. Its regeneration and re-development can not only achieve the economic and social objectives associated with the targeted population growth for Limerick City in a sustainable manner, but it can also act to revitalise Limerick city and reposition it as a world-class City in Ireland and Europe.

This policy at national and regional level is translated at local level through the Limerick Development Plan 2022 – 2028. Notwithstanding concerns raised by neighbouring residents, Cleeves is identified as a strategic city centre site supported by planning policy which promotes higher density, increased building height and

tall building clusters, whilst conserving and facilitating the adaptive re-use of a number of protected structures and other historic buildings.

On balanced consideration of the foregoing, it is thus respectfully submitted to ACP that notwithstanding the submissions received on the development proposal to date, there is adequate development design rationale and justification, supported by national, regional and local planning policy to support the development proposal and approve consent for what will be the beginning of a significant and positive transformation of the Cleeves site in the heart of Limerick city.

2.0 RESPONSE TO GROUNDS OF SUBMISSIONS

In order to avoid repetition and duplication in response, it is proposed to respond to each of the 12 no. themes detailed in Table 1.0 and to focus on the core issues arising from the submissions. The response will provide a strategic overview of the design team approach and will identify where and how certain concerns have been addressed.

2.1 Letters of Support

The applicant acknowledges and welcomes the letters of support received from a range of prominent businesses and organisations across Limerick City and County. These submissions recognise the strategic significance of the proposed redevelopment and the positive contribution it will make to the wider economic and social landscape.

This support is consistent with the policy position set out in the Limerick Development Plan, which states that the Cleeves site *"will deliver City Centre living and employment creation opportunities, while addressing the economic and social dereliction of this area of the City through large-scale revitalisation."* The proposal therefore aligns directly with the Development Plan's objective to regenerate underutilised urban lands and to strengthen the role of the city centre.

The strategic importance of the site is further reinforced within the Limerick Metropolitan Area Strategic Plan (MASP), where Cleeves is identified as a key brownfield regeneration opportunity. The MASP emphasises the site's role in facilitating compact urban growth, supporting sustainable development principles, and advancing the transition towards a more liveable, resilient metropolitan area. Its redevelopment is also consistent with national policy objectives promoting Transit-Oriented Development (TOD), given the site's accessible, central location and its proximity to sustainable transport infrastructure.

Within the broader city-scale growth strategy, the MASP recognises the Cleeves site as a pivotal asset, capable of reversing patterns of urban sprawl, enhancing urban liveability, and contributing meaningfully to Limerick's evolution as a regional driver of scale, innovation, and sustainability. The letters of support received reflect this shared understanding of the site's importance and the transformative potential of the proposed development.

2.2 Infrastructure Provision

The submission from Uisce Eireann is noted.

With respect to the submission received from the Office of Public Works (OPW) regarding the provision of flood defences necessary to support the future development of the Cleeves site, the Design Team has engaged extensively with Limerick City & County Council's Flood Relief Scheme (FRS) project team. Formal

meetings were held on 7 November 2024 and 30 May 2025 to review flood risk considerations and coordinate design responses. A comprehensive Flood Risk Assessment (FRA) has been prepared for the site by ARUP.

The principal source of flood risk to the site is tidal flooding from the River Shannon. The FRA identifies that the lands fall within Flood Zones A, B, and C, representing areas of high, moderate, and low flood risk respectively. The Shipyard Site and parts of the Infiltration Galleries are located within Flood Zone A. Portions of the Quarry Site fall within Flood Zone B, while the remainder (and the majority) of the lands are situated within Flood Zone C.

The FRA outlines a suite of proposed flood mitigation measures. These include the provision of a finished floor level (FFL) of 5.7 m AOD for commercial uses and 6.2 m AOD for residential accommodation. It is further proposed to raise North Circular Road (NCR) to a minimum level of 5.7 m AOD to ensure safe access and egress during flood conditions. In addition, the construction of a new pedestrian connection at the northern end of the Shipyard Site, linking Condell Road and the NCR and set between 6.78 m AOD and 5.7 m AOD, will contribute to the interim flood defence by completing the defence line pending full development of the Shipyard lands.

Limerick City & County Council has undertaken detailed hydraulic modelling of the River Shannon as part of the Limerick Flood Relief Scheme. During consultation, the option of lowering the defence level at the subject site to align with the Scheme's proposed standard defence level of 5.47 m AOD was considered. However, this approach was deemed sub-optimal as it would not provide for appropriate climate-change allowances. The proposed defence strategy, incorporating higher finished floor levels and complementary site-specific mitigation, therefore remains the preferred and more robust solution.

2.3 Botanical Surveys

The Irish Wildlife Trust (Limerick Branch) raised two primary ecological concerns in relation to the proposed development including the occurrence of maidenhair fern on the site and expressed concern regarding potential impacts on this species. They also identified two additional locations where the species was recorded (Flaxmill building and internal wall along O'Callaghan Strand).

The project ecologists MKO have prepared a response to the issue raised, which is appended to this submission. The presence of Maidenhair Fern on the site, is acknowledged in the EIAR, Chapter 7.0 Biodiversity. Whilst the plant is not legally protected under the Flora (Protection) Order, 2015, it is listed in the Ireland Red List No. 10 – Vascular Plants, and assigned a status of 'Least Concern'. Accordingly, its retention is desirable. Whilst the IWT identified this plant in 2022 at additional locations to those stated in the EIAR, their submission does not materially change the conclusions of the EIAR given that the majority of the substrate will be retained. The submission however does prompt acceptance that further measures could be considered to ensure that the epimural vegetation (including the maidenhair fern) on the site is protected. These additional measures are detailed in the appended MKO response.

The record of bloody cranesbill (*Geranium sanguineum*) on the site and included in the submitted documentation was also queried. The project ecologists have confirmed this is a typographical error. The intended species was dove's-foot cranesbill (*Geranium molle*), which is common and widespread. This correction does not affect the survey results, the significance evaluation, or the mitigation strategy.

2.4 Architecture & Urban Design

2.4.1 Massing Scale & Context

The Architectural Design Team rejects the claim that the proposed blocks are generic or unrelated to the site's industrial heritage. While design interpretation is inherently subjective, the Commission will note that the team comprises experienced architectural professionals with extensive expertise in industrial heritage environments. The scheme's massing is context-led, varied and informed by comprehensive environmental testing, heritage assessments and urban design analysis.

In contrast to the views expressed in the submissions, the scheme has been carefully shaped by the site's industrial heritage, its topography, the surrounding residential context and the objectives of the Limerick Development Plan, including compact growth, brownfield regeneration, heritage-led design and placemaking. A graduated scale and massing strategy has been adopted: lower elements (3–4 storeys) or gables address sensitive site edges, while larger forms sit deeper within the site. This provides an appropriate transition between lower-rise streets and the historically larger industrial structures.

The Architectural Design Report demonstrates that the scheme avoids "wall-like" massing through setbacks, varied parapet heights, slender gables and breaks between blocks, allowing daylight penetration and maintaining key views. Daylight and sunlight studies have guided building height and placement to avoid undue overshadowing of sensitive boundaries. Privacy has been addressed through block orientation, landscaped buffers and the positioning of amenity spaces.

Contrary to the submissions, the development is rooted in a heritage-led approach. Massing, rooflines, materials (masonry and profiled metal) and expressed gables draw directly from the industrial character of the Flaxmill, Engine House and quarry landscape. Variation in parapet lines, breaks between blocks and articulated façades create a human-scaled rhythm. The overall composition reflects both the site's historic identity and contemporary residential quality.

2.4.2 Permeability and Legibility

The assertion that the development "turns its back" on the existing neighbourhood is unfounded. The proposal opens the Cleeves eastern boundary to the river, reveals the Flaxmill to public view and creates a new civic-scale landscaped space for the city, capable of accommodating major events and enhancing daily amenity for residents. By retaining the base of the historic wall, the scheme provides an integrated seating edge overlooking the riverside promenade, maintaining the legibility of the former site boundary. Reinstating historic openings behind St Michael's Rowing Club further improves permeability and access to the waterfront.

A significant feature of the scheme is its open and permeable nature, allowing for ease of pedestrian and cyclist movement within and through the application site.

The proposed public open spaces form a connected sequence around the site, supporting new residential communities and reinforcing place identity. These include the riverside edge; a civic-scaled Flaxmill space centred on the chimney and industrial remnants; the Quarry space at the reservoir; and elevated vantage points at Salesians and Stonetown Terrace. A key design challenge has been addressing significant level changes between the Salesians, Quarry, Flaxmill and Stonetown Terrace areas while ensuring continuous pedestrian and cycling routes.

As outlined in the Planning Compliance Statement, the proposed development represents Phase II of a wider Masterplan Framework. Aligned with Development Plan objectives, the Masterplan delivers the infrastructure and services needed to support city centre renewal and new housing.

The Masterplan accommodates a balanced mix of uses in accordance with the site's city centre zoning: approximately 60% commercial/educational floorspace, 30% residential and 10% mixed use. At its 2022 conception, it provided for:

- 275 student bedspaces on the Quarry site
- 180–220 residential units
- 35,000–36,500 sqm commercial/educational floorspace
- 5,000–6,500 sqm mixed use

Residential uses are concentrated on the Salesians, Quarry and Stonetown Terrace lands to respond appropriately to neighbouring housing. Commercial activity is focused along the North Circular Road on the Shipyard, Infiltration Gallery and Flaxmill sites. The 281 sqm commercial unit at ground floor of the proposed O'Callaghan Strand building demonstrates this intent and will help shape future ground-floor activity around the new plaza.

2.5 Residential Amenity

The submissions raise many issues relating to the height and density of the development proposal including associated issues of concerns regarding overdevelopment, overbearing nature of development, and loss of residential amenity including privacy and overlooking. All of these issues are inter-related and accordingly need to be addressed together. Issues were also raised regarding Daylight and Sunlight and these will be addressed separately. Whilst it is acknowledged that a number of submissions specifically refer to impacts on individual homes, this response submission collectively responds to groups of housing as opposed to individual houses.

2.5.1 Height & Massing

It is acknowledged that the proposed development represents a noticeable change in the area. The increased building scale and height proposed for the taller buildings within the new development represents a degree of divergence from most of the existing lower scale residential development around the site, predominantly to the north and west. However, the proposed scale and height accords with the Building Height Strategy for this area of the city and does not diverge from the prevailing norm for taller buildings in the city centre zone of which this is part.

In considering the context of the development proposal, regard must also be had to the policy context at both national and local level which promotes compact development and higher densities on sites, particularly those in city centre locations. In particular, the Limerick Development Plan focuses delivery of tall buildings in the city centre. Of note, tall building clusters are encouraged at the Cleeves Site in accordance with the building classification criteria set out in the Building Height Strategy (Objective CGR 09). Specifically, regard must be had to a number of Tall Building Recommendations for the Cleeves site, including:

- Subject to a Masterplan, 'taller, landmark, gateway and city landmark buildings' as defined in the 'Tall Building Classifications', are appropriate;
- Height/areas of height will be encouraged, in line with the Masterplan, where delivered through excellent design and that achieves a high-quality townscape and placemaking;
- Taller buildings within a cluster of varying height that relate to each other and their surrounding urban context in terms of street layout, massing and design are encouraged;

- This site should facilitate a gateway building given its significant location; and;
- This site could facilitate a city landmark that is not a building, such as a significant art piece.

The Urban Development and Building Height Guidelines 2018 require planning authorities to apply a number of broad principles in considering development proposals for buildings taller than prevailing building heights in urban areas. An evaluation of the proposed development has been undertaken in respect of these criteria as detailed in Table 11.1 of the Planning Statement accompanying the application for approval. The Building Height Strategy for Limerick confirms that applying these principles at the Character Area level delivers building height guidance that is unique to Limerick and that is also in accordance with National Guidance. Table 12.4 and Table 12.5 of the same report also provides an evaluation of the development against local policies in the Limerick Development Plan 2022 -2028.

Facilitating increased building height does not, in itself, constitute overdevelopment. This term is repeatedly invoked within the submissions, yet it is not supported by the quantitative parameters of the proposal. At a density of 117 units per hectare, and with 0.78 hectares of public realm and open space provided, it is respectfully submitted that the site cannot reasonably be characterised as overdeveloped.

Regarding concerns relating to residential amenity, including privacy, overlooking, and the alleged overbearing nature of the scheme, it is accepted that occupants of the closest properties will perceive the greatest degree of change. As with any new development in an established urban area, the proposal will represent a significant alteration to the existing context. Nonetheless, the scheme has been carefully designed to protect the amenities of adjoining residents within acceptable tolerances, particularly in light of its city-centre location. While some overlooking of front and rear gardens will occur, as is typical in urban settings, adequate privacy will be retained due to the separation distances between existing dwellings and the proposed buildings, as well as the considered orientation of the development. The Commission will note that there are no balconies on the northern elevations of the Salesians building thereby ensuring no direct overlooking of the rear gardens on Clanmaurice Avenue.

A number of submissions reference alleged inaccuracies in the stated distances between the proposed development and houses on Clanmaurice Avenue. As noted earlier, these measurements appear to rely on material from the public consultation stage rather than the final planning documentation. For clarity, and as set out in Table 11.3 of the Planning Statement, the following distances accurately describe the relationship between the proposed blocks and the surrounding residential properties:

- There is a minimum separation distance of 31.1m between the closest ‘extended’ house on Clanmaurice Avenue and the proposed development blocks on the Salesians and Quarry site. This distance increases dependent on the nature and type of housing unit on Clanmaurice Avenue.
- There is a 13m separation distance between the gable end of the 3 storey townhouses on the Stonetown site and the last semi detached house in Clanmaurice Avenue, whilst the separation distance between the neighbouring detached house in Clanmaurice Gardens and the proposed townhouses is 5.7m. However, there are no windows on the gable end of the terraced townhouse and the issue of opposing windows or overlooking does not arise.
- There is a minimum 21.7m separation distance between the proposed apartment block on the Stonetown Site and Landsdowne Hall.
- There is a separation distance in excess of 20m between the proposed building on the O’Callaghan Strand site and the properties of Stonetown Terrace. However, the distance does reduce to 10.3m where a blank gable wall from one of the properties on Stonetown Terrace (no windows) extends to the edge of the existing street footpath.

- The triplexe units addressing North Circular Road are situated a minimum 22.9m from the rear of the houses in Fernhill.

It is therefore submitted that the potential for overlooking, loss of privacy, or undue overbearing impact has been mitigated through the proposed separation distances and building orientation.

The visual impact of the scheme has been robustly assessed in Chapter 12.0 Landscape of the EIAR. Although Viewpoints 12, 13 and 14 are in the vicinity of Clanmaurice Avenue, it is acknowledged that no CGI or Verified View was prepared from within the avenue itself. This reflects the limited availability of public views, owing to the tight spacing of houses along the street, which restricts visibility towards the site.

However, the Commission's attention is drawn to Contiguous Elevation Drawing: Proposed Site Elevation 01 – B1. This drawing illustrates the relationship between the proposed Salesians and Quarry buildings, the neighbouring primary school to the west, and the intervening houses on Clanmaurice Avenue to the north. While the elevation demonstrates the difference in height between existing and proposed buildings, it does not fully express the substantial separation distances involved. These are more clearly depicted in Figure 11.0 of the Architectural Design Statement.

2.5.2 Daylight & Sunlight

The proposed layout of the development has been meticulously designed to optimise the quality of sunlight and daylight for both the residential units, PBSA and public and communal open spaces, while simultaneously minimising any potential adverse impact on the surrounding built and natural environment.. A Sunlight, Shadow and Daylight Assessment has been undertaken by IES and is detailed in Chapter 17.0 of the EIAR and in a report under separate cover accompanying the application for approval. Section 8.3 of the Planning Statement also provides a comprehensive overview of the findings of the study.

Several submissions challenge the use of British Standards, alleging reliance on inappropriate or minimum thresholds. This suggestion is incorrect. The Planning Design Standards for Apartments 2025 explicitly require reference to the Sustainable Residential Development and Compact Settlements Guidelines 2024, Section 5.3.7 (Daylight). These guidelines state:

"(b) … regard should be had to quantitative performance approaches to daylight provision outlined in guides like A New European Standard for Daylighting in Buildings IS EN17037:2018, UK National Annex BS EN17037:2019 and the associated BRE Guide 209 (2022 Edition), or any relevant future standards or guidance specific to the Irish context."

In addition, Section 1.7 of BRE Guide 209 states:
"The guidance here is intended for use in the United Kingdom and in the Republic of Ireland…."

Accordingly, the IES assessment correctly applies the standards expressly recognised in national planning guidance.

While several submissions dispute the assessment's findings, residents of Stonetown Terrace place particular emphasis on this issue and have undertaken their own calculations. A specific response to these concerns is therefore warranted.

Sunlight to front gardens – Stonetown Terrace
Submissions incorrectly assert that garden sunlight should be assessed using Annual Probable Sunlight Hours (APSH). The BRE Guide (3rd Edition), Section 3.3.17, confirms that sunlight to *amenity spaces* is

assessed using the BRE's quantitative test for amenity sunlight. The IES assessment concludes a negligible impact, with the proposed development achieving 86%, well above the minimum 50% recommendation, and within 90% of the existing baseline scenario.

Sunlight to dwellings – Stonetown Terrace

Three representative assessment points were used to evaluate sunlight to existing dwellings. While some overshadowing occurs in March and December, the APSH results exceed the BRE target values of 25% annual sunlight and 5% winter sunlight. Under the BRE methodology, occupants should not notice a perceptible loss of sunlight.

Daylight to dwellings (VSC)

The Vertical Sky Component (VSC) test was also applied to the relevant windows on Stonetown Terrace. All assessment points exceed the BRE recommendations for daylight access.

In respect of Stonetown Terrace and all other properties assessed, the impacts have been assessed in full accordance with BRE Guide 209 (3rd Edition). The impact studies have presented some impact on the surrounding residential properties, as expected when introducing a high density development in an urban scenario. However, the outcome aligns with standard expectations for urban regeneration projects where existing low-density or undeveloped sites are transformed to meet contemporary housing demands.

2.6 Heritage

The main heritage issue arising from the submissions relates to the proposed demolition of Fernbank House. Contrary to the submissions made that no conservation assessment was undertaken, the Commission will note that a Statement of Significance was prepared to guide proposals for the conservation and redevelopment of the site, with Section 17 of the report assessing the significance of Fernbank House. The report concludes that:

> *"The house is not a part of the Flax Mill and as such does not hold significance as a curtilage structure. Public consultation in 2023 highlighted the interest that exists in Fernbank House. The consultation included reference to the link between the Cleeve family and the house. Of the buildings, in their much-altered form the original and early domestic parts of Fernbank House retain some 'Artistic interest' but do not relate to the design or operation of the Flax Mill site. In their current form the exteriors are quite unlike the designs of the earlier buildings. Some of the interiors survive as a mixture of early and adapted fabric. The building overall has not been legible as a dwelling for many decades. Changes since 1924 would be deemed to be erosive to the building's significance as an historic house. The period of use as a school resulted in changes that have altered the historic building form and use. In 2024, an Architectural Heritage Assessment by the Conservation Officer determined that Fernbank House did not pass the high bar for designation as a Protected Structure and as such it was not added to the RPS".*

Further, Chapter 9.0 of the EIAR provides a comprehensive assessment of the development with respect to its built heritage significance, including Fernbank House. The EIAR states that:

> "*The historic development of Fernbank House has resulted in the total erosion of its legibility as the Victorian villa that occupied the site between the 1880s and 1950s. The later additions are of no cultural value, and their presence does not add to the value of the former house. A notion of restoration to return the House to an earlier form emerged during the public consultation. Restoration at such a scale is not supported in current conservation practice. Such an approach is unusual and counter to ICOMOS principles specifically Article 15.1 which states restoration is appropriate only if there is*

sufficient evidence of an earlier state of the fabric, and only if returning the fabric to that state reveals culturally significant aspects of the place.

Fragments of the original house are still present and, due substantially to their individual quality and expression of craftsmanship, possess some cultural value. Section 6.7 of 'Architectural Heritage Protection Guidance for Planning Authorities 2011' outlines the opportunity for conditions to be imposed. In recognition of the potential to mitigate the impact of the demolition of the Salesians School (inclusive of fragments of the former Fernbank House) building recording has been undertaken. This provides a permanent record of the former house and has permitted the preparation of a schedule of components and features for salvage. These measures offer a proportionate approach to allow for the preservation of the building's interest".

Initial consideration was given to the adaptive reuse of Salesians School and Fernbank House. However, early consideration determined that converting the school into housing would present significant challenges due to differing spatial requirements, existing infrastructure, and regulatory hurdles. The Salesian School was designed for a specific educational function, and features large classrooms, a gym, and specialised spaces that do not easily translate to residential layouts. Additionally, adapting the plumbing, electrical systems, and fire safety measures to meet current residential building codes can be complex and costly. These challenges, with resulting low density development over four stories only, would not result in an optimum design or density solution for this city centre site.

The Architectural Design Report accompanying the development proposal explored options for reuse of the building. Its preliminary capacity assessment demonstrates that with suitable retrofitting to modern building regulations, approximately 72 no. homes could be accommodated within the existing fabric, along with 32 no. new build units in a 4 storey block. This would only yield 104 no. residential units on the site in contrast to the 166 no. units achievable with demolition. Ultimately, retrofitting the structure would be more expensive and less effective than new construction. Furthermore, the building's footprint and location present a significant constraint to achieving the density and permeability targets necessary to meet housing delivery objectives if retained.

2.7 Transport & Access

The submissions raise a wide range of traffic and transport concerns, including alleged deficiencies in the Traffic and Transport Assessment (TTA), insufficient car parking, an unrealistic Mobility Management Plan, lack of public transport, inadequate emergency access, limited capacity on Stonetown Terrace, and insufficient management of deliveries. It is also inaccurately stated that a number of studies have not been included with the application for consent including a DMURS Statement, Road Safety Audit, and Construction Traffic Management Plan. All these necessary and relevant assessments and reports were undertaken and are included in the application for consent.

It is respectfully submitted that all of these matters were fully considered during the design process and are appropriately addressed in the submitted plans and drawings. For example, the Site Layout Plan and Landscape Plan clearly identify three set-down areas on North Circular Road to accommodate deliveries and refuse collection, the Operational Waste Management Plan defines the strategy for the site and Section 4.3 of the TTA deals with waste management and deliveries. No removal of existing parking on Stonetown Terrace is proposed.

Contrary to the views expressed in some submissions, the site is located within Limerick city centre and is zoned for such uses. Its central location benefits from direct access to services and sustainable transport

options, including walking and cycling. This is not a suburban context, and traffic expectations must therefore reflect a city-centre environment

2.7.1 Traffic & Transport Assessment

In response to the alleged deficiencies in the TTA, it is submitted to the Commission that the TTA is robust and has been carried out in accordance with standard practice. The TTA takes account of the existing traffic conditions in the area surrounding the proposed development. A comprehensive traffic survey was carried out in November 2024, the findings of which have been detailed in the TTA. This survey was undertaken mid-week over a 24-hour period at key junctions and as such, has captured traffic volumes associated with trip attractors such as the primary and secondary schools in the vicinity of the proposed development.

These traffic surveys were used as the basis for the impact assessment of the proposed development described in the TTA. The impact assessment focused on Salesians Roundabout as a critical junction given its significance in terms of providing access to the trip attractors in the area (i.e. primary schools) as well as the proposed development. Given that the proposed development includes the removal of the existing Euro Car Parks, there will be a net reduction in peak-hour flows through the Salesians Roundabout, confirming that the development will not create operational pressure on the surrounding streets and roads.

Clanmaurice Avenue is a cul-de-sac which provides no access to the proposed development. It is not expected that traffic will increase on this street or at its junction with Shelbourne Road as a result of the proposed development.

Stonetown Terrace is already a low-speed residential environment which the proposed development will enhance through shared space design and traffic calming. Minimal parking provision at the Stonetown Terrace development (14 spaces) and O'Callaghan Strand building (5 spaces) will result in, at most, one additional car trip on Stonetown Terrace every four minutes during the peak hour.

Section 6.1 of the TTA assesses construction traffic and confirms that there will be a marginal uplift (2%) in traffic volumes through the Salesians roundabout during the AM and PM peak periods. This is considered to be a marginal uplift, especially considering the robust trip generation assumption and the temporary nature of construction traffic.

Taken together, these findings confirm that the TTA has been properly prepared, is methodologically robust, and demonstrates that the proposed development will not result in adverse traffic or transport impacts on the surrounding area.

2.7.2 Car Parking Provision

The Limerick Development Plan 2022 – 2028 provides for a maximum provision of 128 no. car parking spaces on the site. The proposed development provides for 116 no, spaces or 90.6% of the maximum allowable provision. Thus, contrary to the submissions made, there is not a significant under provision of car parking within the development proposal.

The limited car parking provision is part of the development's strategy to promote sustainable mobility amongst Cleeves' residents. This is based on studies which demonstrate that car parking availability impacts on travel mode choice and in particular, reduced car parking, which encourages people to choose walking, cycling and public transport as their main modes of transport.

The proposed development is located in close proximity to Limerick city centre and as such, there is an abundance of trip attractors within a 10 – 20-minute walk or cycle. Minimal car parking provision will help to encourage residents to choose walking and cycling to these destinations over private vehicles. This is in line with national, regional and local planning policy and is being reflected in developments across the country. Walking is already one of the primary modes of transport in the area surrounding the proposed development, accounting for 36% of commuting trips according to 2022 CSO data. The proposed development is expected to have similar walking mode share.

Existing cycling mode share in Limerick is not currently at the levels that policy estimates it will be in the future. However, it is important to consider the proposals for improvements to surrounding cycling infrastructure as well as the high-quality cycle parking facilities being provided as part of the proposed development. It can therefore be assumed that cycling associated with the proposed development will be significantly higher than the current Limerick average.

Both TUS' – Moylish Campus and Mary Immaculate College are located within a 10-minute cycle of the proposed development and therefore cycling will be an attractive option for students travelling to these campuses. Occasional car needs for residents without a vehicle are addressed through the residential car club which provides 10 car-club vehicles for residents only, 26 no. visitor spaces and cycle parking. For the above reasons, the residential car parking ratios (0.24 – 0.34 per unit) and PBSA ratio (0.03 per bed) are considered to be justified. Note that these ratios are calculated without the car club spaces.

2.7.3 Mobility Management Plan

The transport strategy for the proposed development takes account of future planned transport strategies for Limerick such as LSMATS, BusConnects and Cycle Connects. While these schemes are not yet delivered, it is essential that the TTA considers them.

Land-use planning and transport planning cannot be delivered in isolation – development must take account of existing and proposed transportation strategies to ensure integration with and access to the surrounding transport network at present and into the future. The proposed development, which is predicated in sustainable mobility principles, is part-and-parcel of the delivery of land use that supports a future vision of Limerick as a vibrant, well connected city offering a high-quality of life for urban residents. This vision is firmly fixed in national, regional and local policy.

In addition to the above, it should be noted that walking is being proposed as the primary mode of travel for Cleeves' residents (target mode share of 40%). This is supported by the site's location and the presence of numerous trip attractors located within a 20 minute walking catchment of the site, as well as the proposed development's people focused (rather than vehicle focused) design philosophy (i.e. limited car parking provision, high-quality pedestrian environment and permeability). As stated above, CSO data indicates that walking already makes up 36% of the mode share for commuting purposes in the area surrounding the proposed development and therefore this target is considered easily achievable.

Other target mode shares such as cycling (22%) and public transport (15%) are supported by the residential make up of Cleeves and the facilities being provided as part of the proposed development and will be further supported in future by planned improvements to the cycle and public transportation networks which are planned to be delivered by others.

2.8 Community Infrastructure

2.8.1 Community Facilities

Contrary to the assertions made in the submission, the proposed development provides a substantial range of community-focused facilities. These include 281 sqm of commercial floorspace at ground level on O'Callaghan Strand and a 381 sqm crèche on the Salesians site accommodating 36 children. In addition, the scheme delivers significant public realm and open space, including both hard and soft landscaped areas designed for the benefit of existing and future residents.

The reservoir area has been carefully designed to realise its recreational potential while maintaining its biodiversity function. It will form the centrepiece of a new public park incorporating distinctive play space informed by the site's cultural and natural heritage.

The Public Realm Strategy intentionally retains the space in front of the sunlit Flaxmill façade as an open, flexible civic area capable of hosting events under a new riverside canopy. Interconnected green spaces across the development ensure local play areas within each zone. While no formal sports facilities are proposed, the riverside canopy offers opportunities for informal play and outdoor training, as does the publicly accessible play area adjacent to the reservoir and student accommodation.

There is also significant potential capacity for additional community uses within the ground floor of the Flaxmill building, to be delivered under the Phase III TUS Educational Campus application, consistent with the Masterplan vision. Current community groups operating under licence on the site can continue to be accommodated in retained buildings pending delivery of Phase III.

Furthermore, the Shipyard Site will operate as a temporary event space, capable of hosting cultural, arts, and music events, as well as pop-up community uses such as food markets and stalls, should demand arise.

In summary, the proposed development incorporates a comprehensive suite of community, childcare, recreational, cultural, and public realm provisions. These facilities, combined with future opportunities within the Flaxmill building and interim uses at the Shipyard Site, demonstrate a clear commitment to delivering a well served, community oriented neighbourhood. Claims that community facilities have been overlooked are therefore unfounded.

2.8.2 Sustainability and Social Infrastructure Statement

It is difficult to reconcile the assertion that there are no services or facilities within a 10-minute walk of the site with its central urban location. The accompanying Sustainability and Social Infrastructure Statement clearly demonstrates both the availability and accessibility of a wide range of facilities across all major categories identified in the audit.

One submission queries the accuracy of the 10-minute walktime and alleges that the defined catchment area extends beyond this threshold. In response, the walktime was calculated using a network-based analysis along the existing public road and footpath network, rather than by applying a simplistic straight-line radius. This method accords with recognised best practice in walkability assessments and is illustrated in Figures 3a and 3b of the report. The analysis also confirms that the area has generally level topography and continuous pedestrian infrastructure, meaning the assumed walk speeds and resulting network coverage are representative and robust for an urban location. The 10-minute walktime itself is based on an approximate 800m distance, consistent with the Limerick Development Plan, and the catchment was generated using ESRI ArcGIS Pro software. Accordingly, it is respectfully submitted to the Commission that the walktime

catchment used throughout the demographic, inventory, and service audits is both accurately defined and consistently applied.

Within this catchment, the audit identifies substantial provision across all service categories. This includes over thirty sports and leisure amenities, eleven primary schools (including special educational needs provision) with access to a wider network of post-primary and higher-education institutions, approximately forty-seven GP and healthcare practices within 1 km, and an extensive range of retail, civic, and cultural facilities located within 500 m in Limerick City Centre. The evidence therefore clearly demonstrates a well-serviced 10-minute neighbourhood, contrary to the assertions made in submissions.

Public transport and active travel options further reinforce this conclusion. Five bus stops lie within approximately 500 m of the site, providing access to a broad city-wide network including the 304/304A high-frequency services. In addition, TFI Bikes are available near Sarsfield Bridge, and a permanent cycling upgrade is planned for Shannon Bridge. These multimodal options enable residents to reach additional destinations in well under 10 minutes, further countering any claim of limited local accessibility.

2.9 Prematurity Phasing and Deliverability

The overall cost of delivering the Masterplan is estimated at €405 million, with the current application representing an investment of approximately €175 million. Given the scale of the 5.09-hectare site and the complexity of required remediation and built-heritage interventions, it is entirely logical and appropriate that regeneration would proceed on a phased basis. There is no requirement within the Development Plan that the site be delivered in a single phase, nor would such an approach be realistic for a site of this scale, sensitivity, and strategic importance. Instead, the Development Plan requires preparation of a coordinated Masterplan, which has been completed to guide integrated development. On this basis, the proposed development cannot reasonably be considered premature.

In terms of deliverability, the Cleeves Masterplan clearly sets out a four-phase development strategy, as detailed in the Planning Statement. Phase I heritage works are already underway, with substantial investment committed to the stabilisation and conservation of the Flaxmill Building. Furthermore, the allocation of €34.5 million under the Urban Regeneration and Development Fund (URDF) provides critical support for enabling works, unlocking the site's development potential. These actions and secured funding demonstrate clear intent, commitment, and capacity to advance the regeneration of this strategically located city-centre site

2.10 Housing Mix & Student Demand

2.10.1 Housing Mix

Contrary to assertions made in the submissions, the proposed residential mix at Cleeves comprising 87.4% one and two bed units (including studios) and 12.3% three-bed units directly aligns with the demographic profile, documented housing need, and policy objectives for Limerick City. This has been clearly articulated in the Housing Mix Assessment accompanying the application for consent.

The Limerick Housing Need and Demand Assessment (HNDA) confirms that the majority of future demand within the city is for smaller unit types, not family-sized housing. Within the Castle C Electoral District, which surrounds the site, there is a marked undersupply of smaller units. This imbalance means the local area currently lacks the housing types most suitable for young professionals, singles, couples, and older persons downsizing groups that dominate the local demographic profile.

National, regional and local policy, including the NPF, RSES, and the Limerick Development Plan, all promote higher density housing in accessible urban locations; increased apartment provision near public transport, services, and employment; and housing choice that enables compact growth and inclusive communities. The Cleeves site, located in the city centre, within 500m of high-frequency bus services, walking distance of employment and education, and on a major brownfield regeneration site, is an ideal location for smaller units.

While the scheme is primarily composed of 1 and 2 bed units, it also includes 29 no. three-bed townhouses/triplexes, ensuring a level of family-oriented provision and avoiding any mono-tenure outcome. This balanced approach supports the Development Plan's objectives for social inclusion (HO O1) and varied housing types.

The proposed mix, predominantly one- and two-bed units complemented by a proportion of three-bed homes, represents a targeted, evidence-based and policy-compliant response to Limerick City's housing needs. It addresses a documented undersupply of smaller units locally, aligns with demographic realities, and advances the city's objectives for compact, sustainable, and socially inclusive urban living. Far from being imbalanced, the proposed mix fills a critical gap in the housing market and contributes to a diverse, sustainable community at this strategic regeneration site. In fact, it is submitted that there is a high potential for increased positive social contact and diversity within the existing local community as a result of the proposed development being realised.

2.10.2 Student Housing

The assertion that there is no requirement for addition student accommodation on the site is not supported by the evidence. The Student Accommodation Demand and Concentration Report demonstrate a significant and ongoing shortfall in student bedspaces across Limerick. Limerick has a clear and measurable deficit in PBSA and the need for additional student accommodation is compelling.

The private rental market cannot absorb the current and projected demand for student housing. Limerick's HEIs accommodated 30,155 students in 2023/24, far exceeding available PBSA capacity. PBSA currently accommodates only 30% of Limerick's students, well below the accepted ratio of 1 bed per 2–3 students. Moreover, relying on the private rental sector displaces non-student households

There is a lack of student accommodation in the area with only two existing PBSA schemes (55 beds) located within 1km of the site. Introducing student accommodation to the site will contribute to a diverse and vibrant residential environment.

The objections raised regarding need, concentration, location, and demand for student accommodation are not supported by evidence. The Student Accommodation Demand and Concentration Report clearly confirms that

- Limerick has a significant PBSA shortfall.
- Student numbers continue to grow across all institutions.
- The Cleeves site is highly accessible and strategically located.
- The proposal will not over-concentrate student accommodation.
- PBSA at this location supports housing market relief, regeneration, and national policy objectives.

Accordingly, the proposed PBSA is justified, necessary, policy-compliant, and contributes positively to both student needs and the wider functioning of Limerick's housing system.

2.11 Environmental Impacts

A comprehensive Environmental Impact Assessment Report (EIAR) has been prepared to appraise the likely significant effects of Phase II and, insofar as practicable, the wider Masterplan on the environment. The EIAR documents the assessment process and sets out predicted effects, mitigation measures, and residual outcomes in a structured, decision-ready format.

Contrary to claims that the EIAR was “inaccessible,” the document was physically available at two locations in Limerick City (Merchants Quay and Dooradoyle) and published online on the Limerick City & County Council website in a chapter by chapter, readable format, ensuring ease of navigation for both specialists and the general public. A statutory Non-Technical Summary (NTS) was also provided to present the findings in clear, non-specialist language.

Submissions suggesting that key surveys were omitted from the application for consent are incorrect. The EIAR includes the full suite of topic assessments customary for a project of this scale, such as:

- Noise and vibration: Baseline surveys and predictive modelling (including roof-plant emissions), followed by design refinements and embedded mitigation to ensure compliance with relevant standards.
- Microclimate / wind: Assessment of potential wind-tunnel effects arising from building massing, with design responses and, where required, specific mitigation to maintain pedestrian comfort and safety.
- Land and soils / contamination: Site investigation and risk evaluation, with appropriate remediation and handling protocols integrated into construction and operational phases.
- Hydrology and surface water: Surface-water management and SuDS measures designed to maintain greenfield (or otherwise controlled) runoff rates, protect water quality, and ensure network capacity and flood resilience.
- Other EIA factors (as applicable): population & human health, biodiversity (including species-specific measures), cultural heritage (built and archaeological), traffic & transport, air quality & climate, landscape & visual, material assets, and interactions are further detailed in the EIAR.

The resident’s concerns regarding potential environmental impact during construction are acknowledged. While construction effects are temporary, they are fully addressed in the EIAR and controlled through a detailed Construction & Environmental Management Plan (CEMP). The CEMP sets out governance, roles and responsibilities, method statements, monitoring, incident response, and communication protocols, reflecting the site’s complexity and providing reassurance to neighbouring residents throughout the works.

The environmental appraisal for this project has been comprehensive and proportionate. The EIAR (supported by the NTS), the topic-specific surveys and modelling, the embedded design mitigation, and the CEMP together demonstrate that all relevant environmental factors have been identified, assessed, and appropriately addressed to avoid, reduce, or offset significant adverse effects. On this basis, the development has been advanced in full cognisance of its environmental responsibilities and is capable of being delivered in compliance with applicable environmental standards and best practice.

2.12 Public Consultation

Several submissions raise concerns regarding the adequacy of the applicant’s public consultation, suggesting it was either ineffective or insufficient. It is important to note that such consultation is not a statutory requirement, but was undertaken voluntarily and in good faith by the applicant with the intention of informing residents and providing opportunities for meaningful engagement.

Notwithstanding this effort and as evident in some submissions seeking “amendment conditions”, it is clear that certain issues raised by residents, particularly relating to building height and density, could not be accommodated. Requests such as restricting all development to a maximum of three storeys within 30m of existing residential boundaries or imposing mandatory setbacks would directly conflict with the site’s zoning objectives and national, regional and local planning policy.

In total, three public consultation events were held during the preparation of the Masterplan and subsequent planning application. Contrary to the view expressed in some submissions, the proposed development did evolve in response to community feedback. While some changes were incremental, such as refinements to finished floor levels and reductions in certain building heights, others represented more substantial revisions. Examples include the re-envisioning of the reservoir to provide an active, functional amenity rather than a passive feature, and the enhancement of open space provision, particularly in the vicinity of the Salesians lands. The introduction of a covered canopy within the Flaxmill Plaza, referred to as the “golden arches” in one submission, was also a direct response to residents’ requests for additional community and cultural space.

In summary, while the consultation process helped shape several aspects of the proposal, it could not reconcile all community preferences, particularly where these were incompatible with planning policy or the strategic requirements of the site. The applicant nonetheless engaged constructively, resulting in a scheme that incorporates both technical planning considerations and a number of meaningful design improvements informed by public input.

3.0 CONCLUSION

This response documentation makes clear that, while substantial objections were received from neighbouring residents, the proposed redevelopment of the Cleeves site is firmly grounded in national, regional and local planning policy that prioritises compact urban growth, brownfield regeneration, and strategic renewal of underutilised city-centre lands. The Cleeves site is repeatedly identified in the National Planning Framework, the Southern Regional Assembly’s RSES, the Limerick Metropolitan Area Strategic Plan, and the Limerick Development Plan as a key urban regeneration opportunity capable of delivering higher-density housing, employment-supporting uses, cultural and community amenities, and transformative placemaking benefits.

Many of the objections stem from a preference for low-rise, low-density development that is fundamentally incompatible with established planning objectives for city-centre sites, which explicitly encourage increased height, mixed-use development, and efficient re-use of heritage structures. Additionally, concerns expressed in submissions frequently rely on misunderstandings, outdated consultation material, or misinterpretations of the technical documentation, much of which (including EIAR chapters, daylight/sunlight analyses, traffic modelling, biodiversity surveys, and flood risk assessment) was in fact submitted in full with the application for consent.

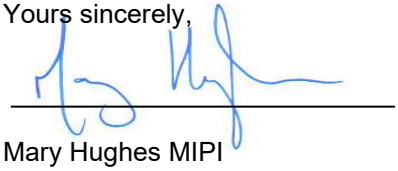
The proposed scheme has evolved through extensive statutory engagement and voluntary public consultation. Despite the unanimous support of multiple key stakeholders such as the University of Limerick, TUS, the Limerick Chamber, and the Civic Trust, opposition from neighbouring properties centres primarily on issues of height, density, overlooking, construction disturbance, and localised traffic concerns, all of which have been addressed through robust design mitigation and technical assessment.

It is submitted to the Commission that the strategic importance of the Cleeves site, the strength of policy support for its redevelopment, and the comprehensive suite of environmental, heritage, transport, and design

evaluations submitted with the application collectively provide clear and compelling justification for approving the project.

We look forward to receiving a decision from the Commission in due course. Should any queries arise in respect of this submission, please do not hesitate to contact the undersigned,

Yours sincerely,



Mary Hughes MIPI
Director HRA PLANNING

CLEEVES RIVERSIDE QUARTER PHASE II SUBMISSION RESPONSE – ECOLOGY - IWT

Description	Response to IWT Submission
Project	Cleeves Riverside Quarter Phase II
Version	1
Preparation Date	24.02.2026
Author	Sara Fissolo/Pat Roberts

Relevant submission

Irish Wildlife Trust (Limerick Branch) (IWT)

This briefing note has been prepared in response to a submission from the Limerick branch of the Irish Wildlife Trust. The submission raises two issues:

1. The presence of maidenhair fern on the site and potential impacts thereon.
2. The record of bloody cranesbill (*Geranium sanguinium*)

Responses to both of these issues are provided below.

Submission Response - Maidenhair fern

Maidenhair Fern is not legally protected under the Flora (Protection) Order, 2015. However, it is listed in the Ireland Red List No. 10 – Vascular Plants, and assigned a status of 'Least Concern'. This means that it does not meet the criteria for Critically Endangered, Endangered, Vulnerable or Near Threatened. Widespread and abundant taxa are included in the category. The presence of maidenhair fern was noted when carrying out the desktop study, however the exact location of these records could not be determined from this survey. During the field surveys, the species was recorded in multiple clusters scattered along the southern and eastern boundary walls. These records were consistent with the results of the desktop study, and the plant was not recorded elsewhere on the site during the surveys undertaken in support of this application. However, the IWT submission has highlighted two additional locations, on the Flaxmill building and interior wall along O'Callaghan Strand.

The submitted EIAR does not predict any significant effects on the species, given that the majority of the stone walls where it was found will be retained, with no proposal to remove any of the existing epimural vegetation or substrate for same. The records in the IWT submission do not substantively alter these conclusions, given that the majority of the available substrate will still be retained. There is no proposal to undertake any works on the walls of the Flaxmill, though there will be loss of some habitat for the species along the section of wall adjacent to O'Callaghan's Strand.

Whilst the species is not legally protected and significant impacts are not predicted, the biodiversity value and distribution of the species is acknowledged. It will be avoided and protected where possible to do so, and its substrate is reinstated to allow recolonisation where it cannot be avoided. Areas of suitable habitat to be lost will be minimised. Further details on the construction methodologies that will be employed are provided below.

Where limestone walls within the site do not require any works, they will be identified during a pre-construction survey and avoided during construction and operational activities. All such areas will be

highlighted to the construction team by the Ecological Clerk of Works (ECoW). Any areas that can be completely avoided will be marked and specifically excluded from any construction works including cleaning or repointing. The majority of the walls on the site will not require any works to be undertaken. Any areas that require maintenance involving vegetation removal that cannot be avoided, will be highlighted and the works will be undertaken as required but will be reinstated to facilitate recolonisation over time. Whilst, the removal of wall habitat is limited in extent, opportunities to create and enhance existing habitats through the use of traditional limestone wall construction techniques and materials will be explored.

Submission Response - Geranium sanguineum

With reference to point 4 of the IWT submission, the reference to the species *Geranium sanguinium* was an error which had been identified during the chapter review process, but was not rectified in the finalisation of the Chapter. The species referred in the report is dove's foot cranesbill (*Geranium molle*), which is common and widespread. No further botanical surveys are required to address this point.