CLEEVES RIVERSIDE QUARTER DEVELOPMENT

Planning Statement

Limerick City & County Council, in partnership
with
Limerick Twenty Thirty Strategic Development DAC

October 2025

HRA | PLANNING

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1.0 INTRODUCTION

This Planning Statement has been prepared by HRA Planning to accompany an application for approval to An Coimisiún Pleanála under Section 175 and 177AE of the Planning & Development Act 2000 as amended, for the construction of 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'. The proposed development includes provision for 234 no. residential units, Purpose Built Student Accommodation (PBSA) comprising 270 no. student bedspaces, commercial floorspace, a creche and extensive public realm works, including the provision of a Flaxmill Plaza, Quarry Amenity Area and Riverside Zone.

The purpose of this report is to describe the proposed development in a planning context and to demonstrate how the proposed development is consistent with proper planning and sustainable development of the area, with particular regard to the provisions of national, regional and local spatial development objectives, planning policies and development standards.

In advance of consideration of the proposed development comprising the subject application, regard must be had to the overall masterplan proposal for the site and the different phases of development proposed. The proposed development comprises Phase II or an overall four phase development approach to the realisation of a keys strategic site in Limerick city centre.

1.1 Design Team

This report should be read in conjunction with the drawings and technical specifications prepared by:

- Architectural Team - Feilden Clegg Bradley Studios and Bucholz McEvoy Architects;
- Engineering Team - ARUP
- Landscape Architects – Mitchell + Associates
- Planning Consultants – HRA Chartered Town Planning & Environment Consultants
- Quantity Surveyors – Mitchell McDermott

1.2 Overview of Proposal

The site, known locally as 'Cleeves Riverside Quarter' comprises the former industrial mill complex ('Cleeves') situated on the northern side of the River Shannon, Limerick City and occupies the area between; Stonetown Terrace Road to the northeast; O'Callaghan Strand to the southeast; Condell Road (R527) to the southwest; and, Salesian Primary School and the 'Fernhill' residential estate to the northwest and west respectively - all situated in the townland of Farranshone More in Limerick City. The application site is dissected by North Circular Road where it extends between Shelborne Road Lower and O'Callaghan Strand. The full extent of the application site is detailed in Figure 1.1.

The proposed development (Phase II) seeks the demolition of a number of structures and the construction and phased delivery of a number of buildings within the application site ranging in height from 3 – 7 storeys including 234 no. residential units; 270 no. student bedspaces; commercial floorspace; and a creche. Extensive public realm works are proposed inclusive of the Flaxmill Plaza, a Quarry Park and a riverside canopy area.

Figure 1.1 Application Site

1.3 Clarification of Terminology Used

This Planning Statement uses specific terminology to describe the application site and the proposed development comprising different phases of development and which form part of an overall Masterplan. The definitions and explanations of key terms are provided to ensure clarity and consistency throughout the document.

Proposed Development – That development as described in the public notices for the purpose of the application for approval, further explained in Chapter 2.0 and including detail on site development works, all of which are assessed in this EIAR.

Application Site – The site comprising 5.09 hectares in area as defined in Chapter 1.0 Figure 1.1 and described in Section 1.7.2, that being the same as the red line boundary on the application for approval drawings and for which planning permission is sought, comprising Phase II development.

Masterplan Site – The site comprising 5.3 hectares in area as defined in Chapter 1.0 Figure 1.4, inclusive of St. Michael's Rowing Club, comprising Phases I – IV development, that being the same as the site defined in the non-statutory Cleeves Riverside Quarter Illustrative Masterplan – Vision Document, Limerick Twenty Thirty, 2023.

Application for Consent / Application for Approval – The plans, drawings and particulars submitted to An Coimisiún Pleanála under Section 175 and 177AE of the Planning and Development Act 2000

2.0 THE FRAMEWORK

2.1 The Applicant

Limerick Twenty Thirty (LTT) is a property development company, established as a special purpose vehicle of Limerick City and County Council, to plan and develop key strategic sites in Limerick City and County. The company has experience in delivering strategic sites, acting as anchors for enterprise and investment development across Limerick and the Mid-West Region.

To name but a few, the 0.2 hectare Gardens International Office site in the heart of Limerick City on Henry Street is a striking example of the new standard of office space that Limerick Twenty Thirty is bringing to market.

The ongoing development of Opera Square, a 1.4 hectare site in the city, demonstrates the sustainability and innovation approach adopted by the company. Opera Square includes the largest new civic space to be created in Limerick City Centre in over 100 years. The project blends new next generation structures with sixteen carefully preserved heritage buildings. Set around a large pedestrianised square, it includes a library, hotel and leisure spaces, and places to live and work.

2.2 The Limerick 2030 - An Economic and Spatial Plan for Limerick

The proposed development is being delivered within the framework of an overall Vision and specific plan for the spatial and economic development of Limerick City centre comprising the Limerick 2030 - An Economic and Spatial Plan for Limerick. The Plan, prepared by LTT, is a once in a generation plan developed to guide the economic, social and physical renaissance of Limerick City Centre and the wider County/Mid-West Region. Whilst prepared by LTT, the Plan has informed the preparation of the Limerick Development Plan 2022 – 2028[1] and states that the Council will have regard the plan[2]. The 20-year action plan was published with a top-line target of €1 billion in enterprise and investment infrastructure and 12,000 jobs. These targets have already been surpassed.

However, Limerick city centre continues to lack the vibrancy and critical mass of other cities. The proposed development of the Cleeves site, as identified in the Plan, represents a unique opportunity to develop a high quality mixed-use development of scale which will secure the long term transformational and rejuvenation of a brownfield city centre site. The total cost of the Masterplan is projected to be €450 million with the proposed development in the region of €175 million.

An Interim Review and Update of the Limerick 2030 Plan was undertaken in June 2022 by consultants on behalf of LTT. The Interim Review effectively updates the Limerick 2030 - An Economic and Spatial Plan for Limerick plan. It seeks to complement the original plan's emphasis on transformational sites and projects, as well as capturing emerging projects and opportunity areas. The Interim Review continues to focus on sites within the city centre that have the potential to be transformative in their impact. It continues to promote Cleeves as a key site within the Worldclass Waterfront Transformation Project promoting mixed use compact development and significant public realm enhancement works.

[1] Section 1.5.7 of Limerick Development Plan 2022 - 2028
[2] Section 3.2.3 of Limerick Development Plan 2022 - 2028

2.3 The Vision

The ambition of LTT is to revitalise and transform the Cleeves site and surrounding area to deliver a World Class Waterfront development in Limerick's urban core. The transformative project seeks to achieve a number of primary objectives:

- supporting the growth of a strong local economy;
- encouraging and facilitating new business investment;
- retaining and integrating the historic buildings and site industrial heritage with contemporary buildings;
- accommodating a mix of uses anchored by a public realm that relates and links to the city core and the River Shannon, whilst implementing high-quality urban design, with sustainable and innovative design.

Once fully developed, the site has the potential to accommodate future population growth through residential unit provision and to further promote a strong local economy through the creation of employment and new local attractions, thereby encouraging and facilitating new business investment.

3.0 CLEEVES MASTERPLAN

The Cleeves Masterplan, published in 2023 by LTT, was prepared in response to the requirements for a coordinated and holistic approach to development on the Cleeves Site (5.30 hectares) as acknowledged [3]in the Limerick Development Plan 2022 – 2028. The Masterplan was subject to public consultation and comprised the first step towards development on the site. It provides a broad framework for LTT's vision for the future and creative re-use of this strategic city centre site and its valuable assets, providing a flexible and phased approach to development. The Masterplan site is slightly larger than the site put forward in the application for approval as it includes the St. Michael's Rowing Club site adjoining the rivers edge. St. Michael's Rowing Club is excluded from the current proposed development and will form part of a subsequent phase of development (Phase IV).

3.1 Masterplan Site

The Cleeves site has a unique location, situated to the north-west of the River Shannon, yet also being assigned part of the City Centre Area. The river visually separates the site from the main city which allows it to form a stronger relationship with the immediate context west of the river. The site's favourable location adjacent to the Shannon Bridge allows direct access across the river to the city centre. Condell Road to the south west of the site is a main arterial route into the city from Shannon Airport.

The existing character of the riverine landscape has always been an important part of the character of Cleeves, though much has been lost following the walled enclosure of the Cleeves site. There is an opportunity to re-create this link to the river both in terms of opening up the landscape and creating new landmark buildings.

There are six distinct but yet permeable areas identified within the overall Cleeves Masterplan site, each with their unique and distinct character, influenced by the four different industrial uses afforded to the

[3] Section 3.4.3.2 Limerick Development Plan 2022 - 2028

site, including the Flaxmill Phase (1850 – 1884), Condensed Milk Phase (1884 – 1927), Dairy Disposal Phase (1927 – 1974) and Golden Vale Phase (1975 – 1986). The six identified areas are detailed in Figure 2.1 and are described as follows:

1. 'Flaxmill Site' (1.6 hectares) comprises the Flaxmill, perimeter walls, Chimney, Engine House, Water Tank and Steeping Galleries, and is one of the most significant industrial sites in the country. The site is also made up of buildings that were constructed between 1890 and 1950. These later buildings have been used for multiple functions including use as workshops. The site is surrounded by a high stone wall, defined by the North Circular Road to the south west, O'Callaghan Strand to the east, and Stonetown Teraace to the north east. The Flaxmill Site is predominantly at the higher level of 5.00 to 5.95 A.O.D.
2. Shipyard Site' (0.7 hectares) gently sloping towards the river, is located between the North Circular Road and Condell Road, adjoining Fernhill residential development to the north west and St, Michael's Rowing club to the south east, is currently used for storage and car parking and includes a warehouse.
3. 'Riverfront' (0.22 hectares) including St Michael's Rowing Club premises and club facilities, is defined by O'Callaghan Strand to the north and the River Shannon to the south extending from a point defined by the Condell Road and Shannon Bridge to the west.
4. 'Stonetown Terrace Site' (0.43 hectares) is accessed via the Stonetown Terrace Road and is defined by the Landsdowne Hall apartment block to the east, existing housing in Clanmaurice Gardens to the north, Clanmaurice Avenue to the west and the Quarry Site to the south. The site comprises an Upper Reservoir structure.
5. 'Quarry Site' (0.61 hectares) is dominated by a cliff face which adjoins the long rear gardens of housing in Clanmaurice Avenue to the north. Part of the southern boundary touches the North Circular Road and extends to include 2 no. Victorian Houses. The quarry was opened in c.1833 and used to supply stone for construction of Sarsfield Bridge (1835) and other major works in Limerick. Quarrying activity included lowering the base of the 1833 quarry to create a sump for the reservoir, which continues to exist today and is a main feature of the Masterplan site. Access to the Quarry site from the Flaxmill is at the higher level of 5.80 A.O.D but drops down to 4.00 A.O.D towards the Quarry wall itself and significantly further down to the Reservoir water level.
6. Salesians Site' (0.9 hectares) is separate to the Cleeves Complex, located to the west of the Quarry site, with the long rear gardens of housing in Clanmaurice Avenue defining the northern boundary, Salesians primary school defining the western boundary and North Circular Road defining the southern boundary. The site comprises a complex of buildings including a former secondary school, currently used for the temporary accommodation of Ukranian refugees, a Sportshall, and Fernbank House, a former private dwelling which has been much altered and extended to meet the needs of the school.

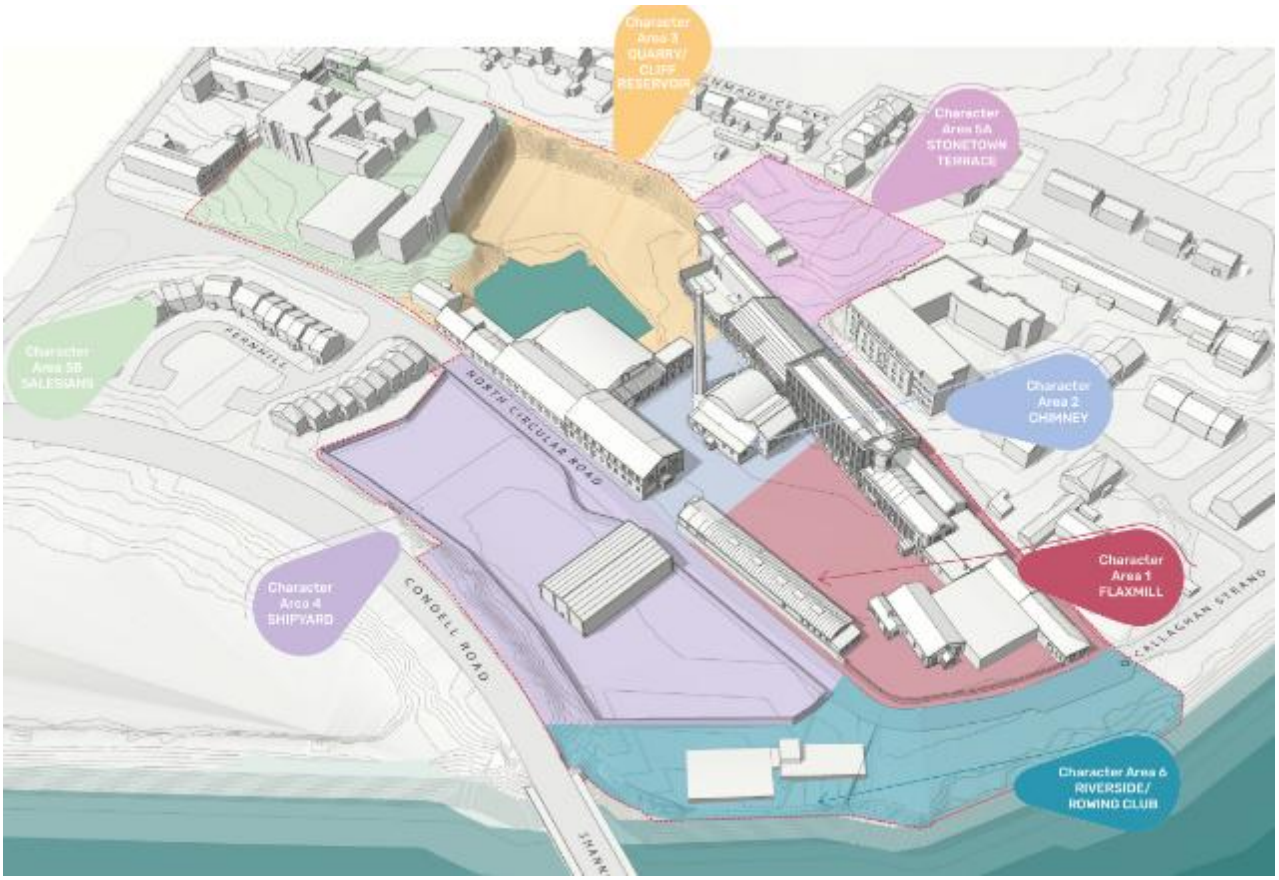


Figure 3.1 Development Zones

3.2 Masterplan Vision

The Cleeves site is unique and provides an opportunity to offer uniquely distinct spaces that do not replicate the amenities and character of other urban spaces. An integrated masterplan underpinned by a resilient and phased design approach is proposed, that:

- Enhances engagement with the city and celebrates the rivers' edge by opening up the Flaxmill site to the river, offering a new riverside vantage point, activating the Shipyard site edge with water-related boating uses. The masterplan responds to the surrounding natural ecosystems and biodiversity, creating an enhanced and accessible public promenade linking O'Callaghan Strand to the Westfields Wetlands.
- Harnesses the value of the unique industrial heritage at Cleeves by organising the Quarter around spaces anchored by the specific heritage elements – Flaxmill buildings and Engine House; Chimney/Water Tank House/Infiltration Galleries; Reservoir/ Quarry, thus amplifying the unique nature of the site and its specific sense of place.
- Acts as an exemplar for conservation-led regeneration scheme of national and international significance
- Creates a vibrant public realm at the heart of the Quarter that links the diverse character areas whilst forming a spine that connects from the Riverside to the Reservoir/ Quarry
- Strengthens connections to the city by an enhanced realm for pedestrians, cyclists and boaters, promoting sustainable modes of movement, with potential for a mobility hub connecting public transport on Condell Road with facilities for shared bikes, scooters etc.
- Creates a permeable and inviting Quarter, enhancing neighbourhood and urban connectivity by pedestrian and visual linkages from Condell Road through to the Flaxmill site and from the upper Salesians and Stonetown Terrace sites to the Reservoir.

- Optimises compact development within the site constraints, whilst respecting visibility of the heritage fabric by concentrating massing away from views of the Flaxmill and iconic chimney.
- Integrates a diverse and complementary mix of Working, Living and Learning uses, in a public realm offering settings to enable benefits to be gained from synergies between different groups, strengthening a sense of community.
- Provides a Resilient Response to the environmental and climate setting through designing with sustainable initiatives and optimising massing for quality internal and external spaces.
- Sets out a sustainable incremental phasing strategy with new phased connection routes

3.3 Masterplan Framework

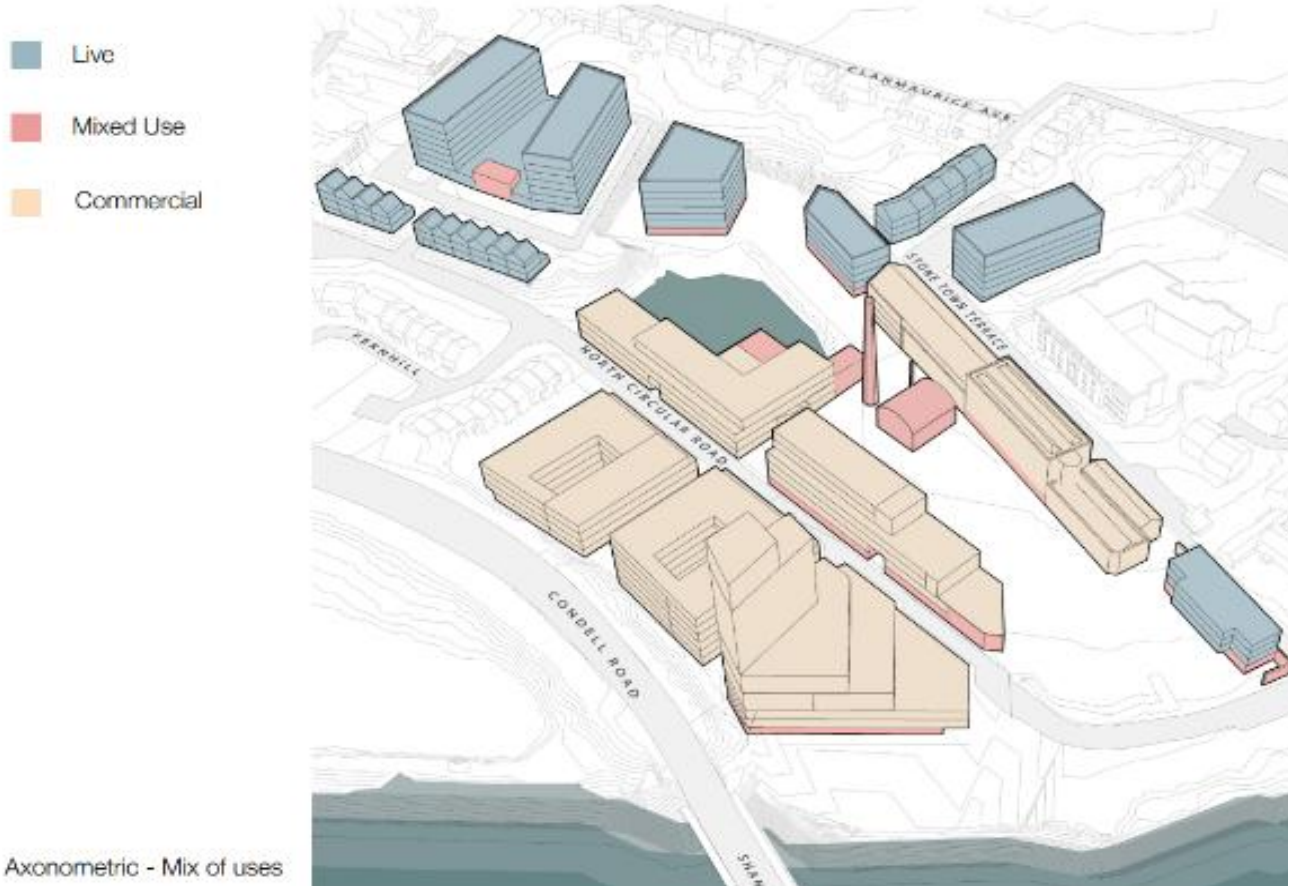
The Masterplan Framework facilitates the urban regeneration and renewal of a central, serviced and under-utilised city property. Consistent with the Development Plan objectives the Masterplan seeks to create an improved physical environment and to deliver services and infrastructure that will contribute toward city centre spatial and economic renewal whilst delivering essential housing.

The Masterplan demonstrates the potential of the site to accommodate a mix of uses with a propsoed 60% of the site dedicated to commercial / educational floorspace; 30% dedicated to residential use; and 10% dedicated to mixed use purposes as detailed in Figure 3.2. The Masterplan at the time of conception (2023) provided for:

- Creative reuse of buildings of heritage significance including the Flaxmill, Cold Store, Engine House and Infiltration Gallery;
- Demolition of Salesians School and other buildings throughout the site, necessary to facilitate development and enable connectivity and permeability;
- Provision of 275 no. student residential bed spaces on the Quarry Site;
- Provision of between 180 - 220 no. residential units;
- Provision of between 35,000sqm – 36,500sqm of commercial / educational floorspace;
- Provision of between 5,000sqm – 6,500sqm of mixed uses;
- Development of a generous civic plaza in the forecourt of the historic Flaxmill; and
- Development of significant public realm facilitating connectivity and permeability

Residential use is primarily located on the Salesians, Quarry and Stonetown Terrace sites to respond to the neighbouring residential context. Commercial development is prioritised along the North Circular Road on the Shipyard, Infiltration Gallery and Flaxmill sites. The massing strategy focuses on optimising compact development whilst respecting the historic context. It seeks to be sympathetic to the surrounding local context, including existing low rise housing, whilst engaging with the waterfront and enhancing visibility of the Cleeves site as a landmark development. The Salesians and Stonetown site to the north respond to the immediate context of low- to mid-rise buildings and the existing Flaxmill building on site, with massing stepping between three and six storeys. South-west of the site on the Shipyard, a new iconic marker is proposed along the riverfront, with the taller element forming a relationship with both the Riverpoint development across the Shannon and the existing Chimney Stack on site.

The Cleeves site is centrally located in Limerick City and is well served by public transport connections. The Masterplan approach has been to reduce on-site car-parking, as supported by national, regional and local policy, in combination with increased parking for bikes. Enhanced connectivity with the established city centre will be promoted and supported, including provision of a proposed new pedestrian bridge as part of the Worldclass Waterfront Initiative.



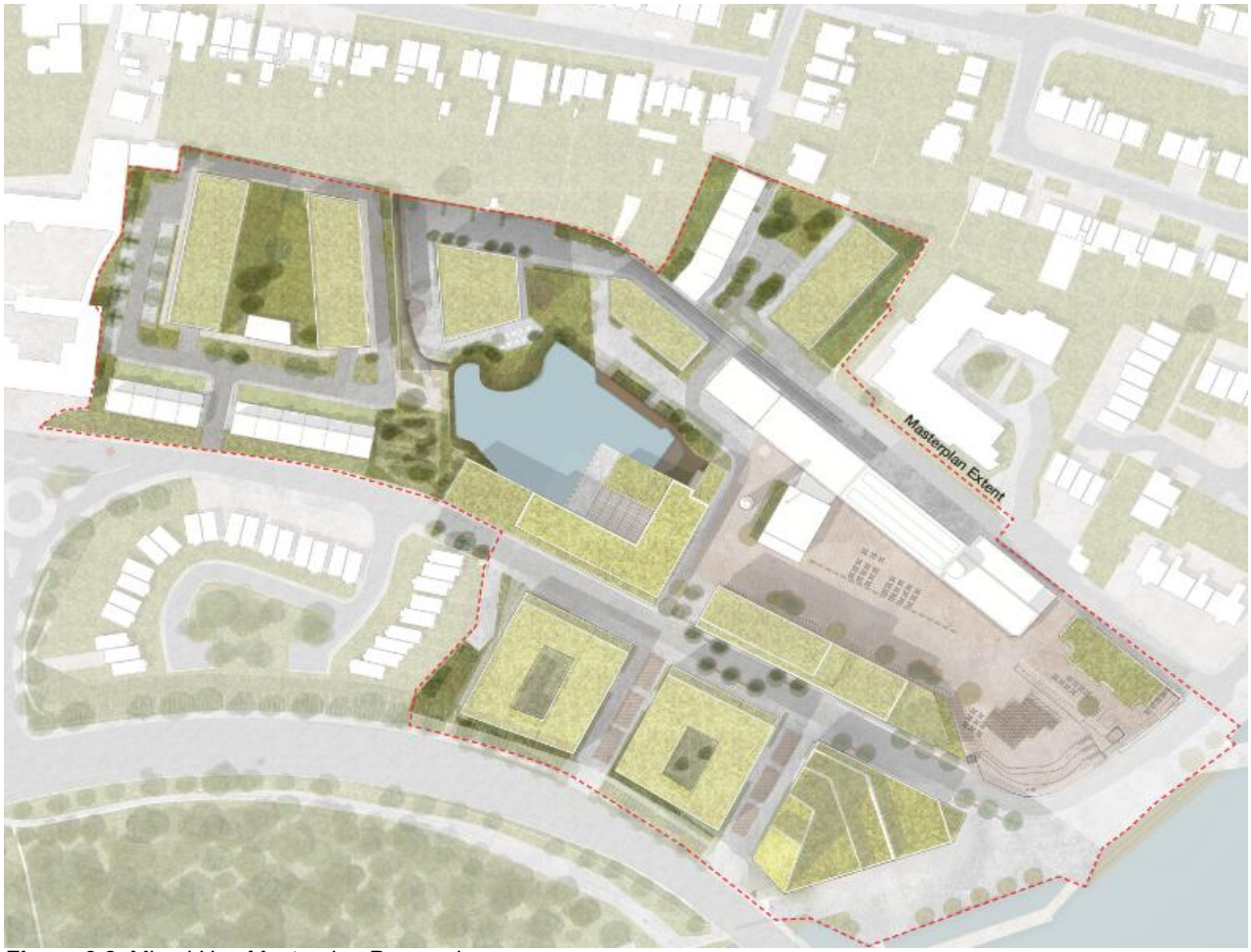


Figure 3.2 Mixed Use Masterplan Proposal

3.4 Masterplan Phasing

The Urban Regeneration Development Fund (URDF) funding secured, (€34.5m), will assist in facilitating enabling works for the Cleeves site, thereby unlocking the site for development. Four phases of development are envisaged in delivering the Masterplan Site.

Phase I – Heritage Works

A phased approach has been proposed to manage the urgent stabilisation and repair of selected structures identified for retention within the Cleeves Riverside Quarter masterplan. Initial phases will prioritise works according to urgency with the objective of preventing loss of fabric due to deterioration arising from exposure to the elements.

Sub Phase 01 – urgent works to Main Mill roof and upper storey, peeling back of modern layers - commenced
Sub Phase 02 – urgent works to Engine House roof and envelope
Sub Phase 03 – urgent works to the Dairy Building roofs
Sub Phase 04 – envelope of the remaining buildings including peeling back of accretions

Works to the Main Mill are at an advanced stage with works due to commence in Q4 2025. The Flaxmill requires substantial and expansive repair and renovation to enable its reuse. Rectification of defects alongside peeling back of modern (post-1970s) layers is necessary to permit the building to be stabilised and repaired. This repair work is required in advance of future works concerning renovation, retrofit and reuse coming forward and is in keeping with best conservation practice and the Architectural Heritage Protection Guidelines (2011).

Phase II - Residential & Public Realm (Subject proposed development)

This application for consent is being advanced for the Residential sites (Salesians Zone, Stonetown Terrace Zone, O'Callaghan Strand which is located within the Flaxmill Zone and the Quarry Zone); and the full Public Realm for the entire site excluding St. Michaels Rowing Club. The commercial buildings proposed for the Shipyard site in the Masterplan are not being advanced as part of Phase II. However, a temporary meanwhile use for the Shipyard Zone comprising a civic / open space is proposed as part of Phase II. Demolition will be undertaken on the application site to facilitate the proposed development, including the total demolition of the Salesians School and associated buildings. The details of this application are provided in Section 7.0 of this report.

Phase III – TUS Campus

Since the Masterplan Framework was prepared for the overall site, a detailed Feasibility Study has been undertaken to assess the potential of the Flaxmill building and proposed new building blocks to accommodate the TUS Campus development. The proposal provides for a development comprising approximately 16,650sqm of primarily educational floorspace, across three buildings including the existing Flaxmill and two new builds adjoining North Circular Road (North Circular Road and Infiltration Gallery) as detailed in Figure 3.3.

The ground floor of the Flaxmill Building will accommodate circa 1,000sqm of commercial floorspace intended to activate the ground floor frontage of the historic façade. The new build element comprises buildings of up to five stories in height including:

- A new core to extend to the top floor of the Flaxmill
- A 3 storey extension to the Cold Store

- A new extension connecting the Engine House and the Flaxmill Building
- A 5 storey building, 16m wide at ground and first floor, on North Circular Road (5,005sqm)
- A 5 storey building stepping down to 3 storeys at the Infiltration Gallery (5,445sqm)
- Landscaping and Public Realm Enhancements

The next stage in the process is *Planning Developed Stage: Outline Sketch Scheme Design* and it is likely that consent shall be sought for this development in 2026, dependent on funding approval from the Higher Education Authority.

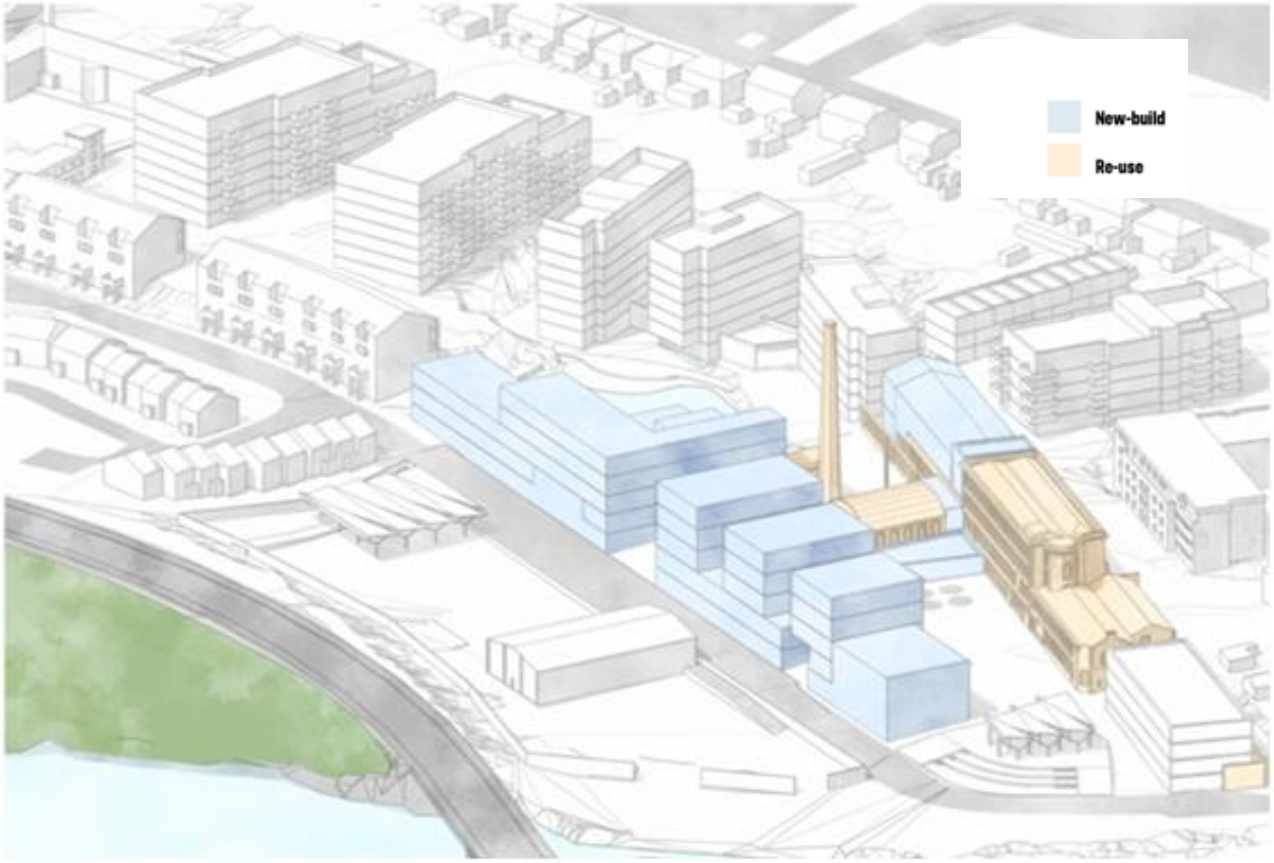


Figure 3.2 Proposed Phase III TUS Development

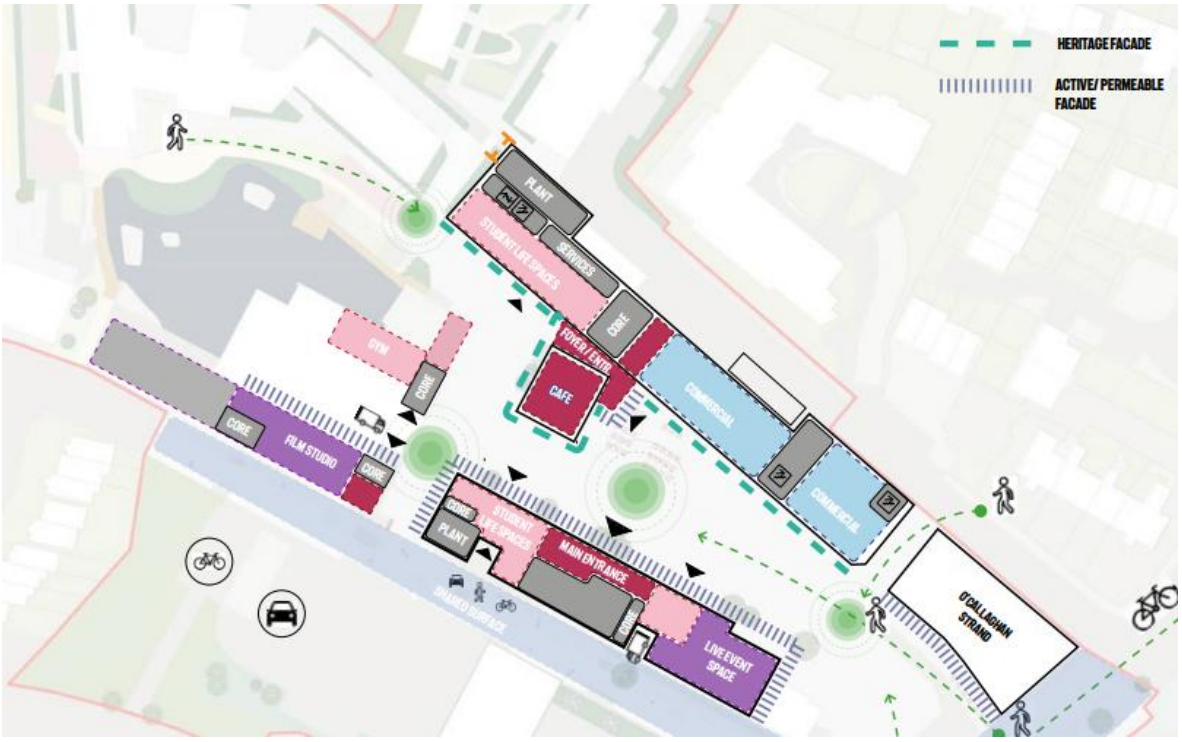


Figure 3.4 Proposed Groundfloor Uses - TUS Development

Phase IV – Shipyard Site

The final phase of development will be the Shipyard site which is intended to accommodate significant commercial development, including circa 23,000sqm of commercial floorspace, with significant buildings of up to 8 storeys in height and a landmark building extending towards the river. This part of the overall Masterplan is intended to accommodate most of the minimal car parking provision for the site within an undercroft / basement level.

There is no timescale defined for the delivery of this element of the development, but it is proposed that detailed design will commence after the consent process associated with the TUS educational campus. In the meantime, a temporary meanwhile use for the Shipyard Zone comprising a civic / open space is proposed as part of Phase II.

Phases 3 and 4 of the Masterplan Framework will be subject to separate applications for permission / consent and will be subject to EIA Screening in the first instance, followed by the preparation of an EIAR where / when considered necessary.

3.5 Extent of Application for Consent

Whilst the area of the proposed development site encompasses most of the Masterplan site, necessary to accommodate site services and public realm enhancement works, it is the extent of demolition, reuse of buildings and proposed new build which differs. Further, the St. Michael's Rowing Club site adjoining the rivers edge, is excluded from the proposed development, but will be included in Phase IV development. The proposed development site (Phase II) is detailed in Figure 1.1..

4.0 PLANNING HISTORY

Historically, the Masterplan site, inclusive of the application site,has had a variety of land uses since the early 19th century. During the early to mid-19th century, the site mostly comprised of agricultural land. There was a quarry located in the central portion of the site. By 1839, there was an active dock yard located in the southern portion of the site operated by the Limerick Ship Company. A detailed overview of the site's history is recorded in the Statement of Significance attached to the proposed development under separate cover and appended to Chapter 9.0 Cultural Heritage - Architectural in the Environmental Impact Statement accompanying the application for consent.

During the 1850's, the site underwent rapid development associated with linen factory production. The flax mill, cold store, Victorian houses, and weaving complex buildings were constructed in the central portion of the site, with the addition of the chimney stack in circa1850. In the late-19th century, the site and buildings were used for a variety of purposes. During the 1870's, the site factory buildings were reopened as a flour and corn mill following a fire in the previous spinning factory.

By 1881, manufacturing of prepared coffee began in the southern dock yard site. In 1884, the Cleeves site began to process cream and skim milk. Additional ancillary buildings and structures were constructed during the late-19th and early-20th centuries associated with the condensed milk operation.

The site conditions and majority of structures remained relatively unchanged during the 20th century. The Salesian's School in the northwest of the site was established in 1924 through the purchase of existing buildings from the Cleeve family. In 1940, the St. Michael's Rowing Club workshop was constructed in the southeast of the site along the River Shannon. In 1950, additional packaging stores and storerooms were constructed associated with the cheese plant. Active use and operation on the site, including milk processing, ceased in 2011.

More recently, there is evidence of the following planning history across the site:

- 2003 - Retention of permission for the provision of 90 no. car parking spaces on site (Shipyard site) for staff, file reference no. 03770381
- 2003 – Retention of existing shop within the Cleeves site fronting North Circular Road in the area of the Cheese Plant / Packaging Store, file reference 03770383
- 2006 – Erection of School Sign and School Plaque at Salesians, file reference 06770090.

5.0 SITE DESCRIPTION AND SURROUNDING AREA

5.1 Surrounding Area

Location & Situation

The proposed application site as defined in Figure 1.1 is situated in a central area of the Limerick city urban area directly adjacent to the city centre on the northern side of the River Shannon as illustrated in Figure 5.1. The site is an urban brownfield site – previously developed comprising several older buildings. Vehicular and pedestrian access is available directly into the site from O'Callaghan Strand and North Circular Road and the site benefits also from a pedestrian access to Condell Road via the 'Riverside Walk' to the north of St. Michael's Rowing club.

The application site's favourable location adjacent to the Shannon Bridge allows direct access across the river to the city centre, with local facilities along the docks, the hospital and the train station sitting within a 15 minute walk radius. Condell Road which runs past the site into the City Centre is the main route between Shannon Airport and the City itself. Therefore, the site will not only benefit from direct and easy access to the airport but also has the opportunity to form a gateway to the City, welcoming local and international visitors.

The landuse zoning objective applicable to the application site (as set out under the Limerick Development Plan 2022-2028) is predominantly 'City Centre' with a smaller parcel (a portion within the northern extremity of the site) zoned 'Existing Residential'. The extent of the (predominant) 'City Centre' zoning is illustrated on Figure 5.1 to demonstrate its proximity and relationship to the wider central 'city centre' urban area.

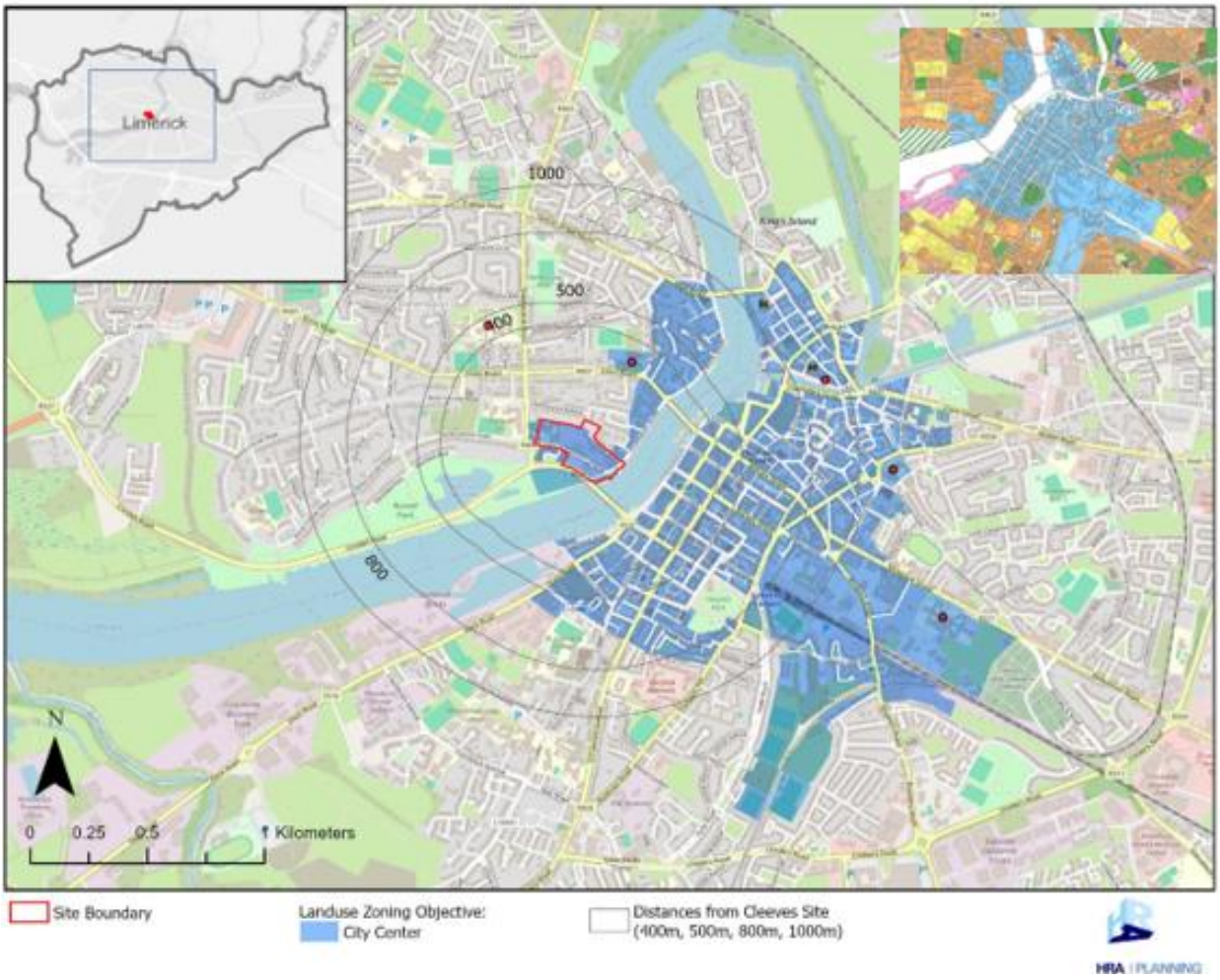


Figure 5.1 Site Context within City Centre Zoned Site

The river visually separates the application site from the main city which allows it to form a stronger relationship with the immediate context west of the river. Local residential neighbourhoods and educational facilities, public parks and sports facilities, as well as the Westfield Wetlands (part of the SAC) surround the application site.

Further detail in relation to the services and facilities that are available in proximity to the application site are provided in the Sustainability and Social Infrastructure Statement prepared by HRA Planning and accompanying the application for consent.

Public Transport

The Cleeves site is well connected to the surrounding neighbourhood, Limerick city centre and employment zones via local roads, footpaths, and cycle lane infrastructure. It benefits from five designated bus stops within a 10-minute walk ensuring coverage in both city-bound and outbound directions. Regional bus services at Arthur's Quay are accessible within a 12-minute walk, and Colbert Train Station – providing direct intercity connections to Dublin, Galway, and Waterford – is a 15-minute walk away. Cycle connectivity is supported by existing and planned infrastructure across Shannon Bridge, ensuring a permanent cycle link to the city centre.

There is only one bus service (304) in Limerick city currently offering a 15 minute frequency. That service runs from Ballycummin in the Southern Environs to UL in the Eastern Environs. The subject application site is located 700m (10 minute walk) from the bus stop on O'Connell Street providing access to the key employment nodes of Raheen Business Park, University Hospital Limerick and the University of Limerick. The bus frequency is planned to increase to every 10 minutes under BusConnects.

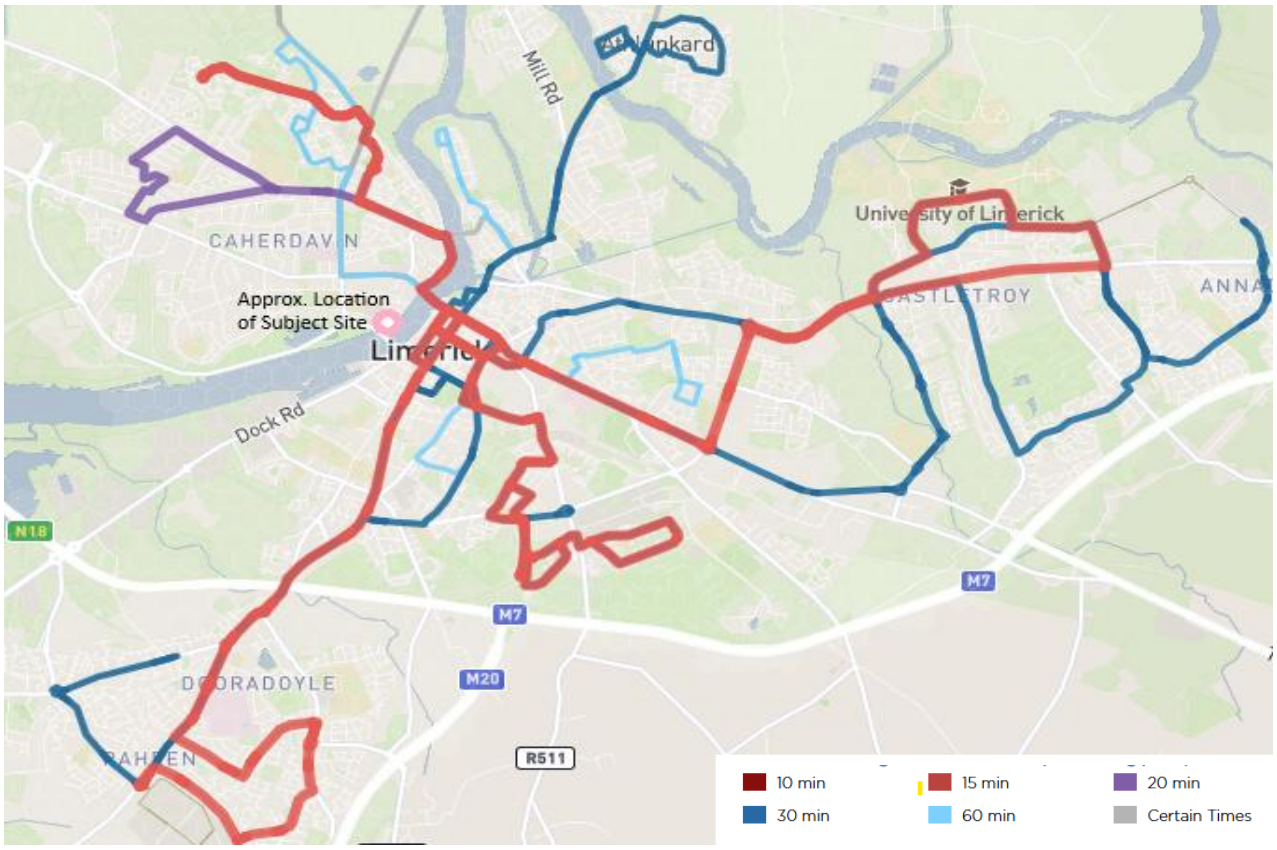


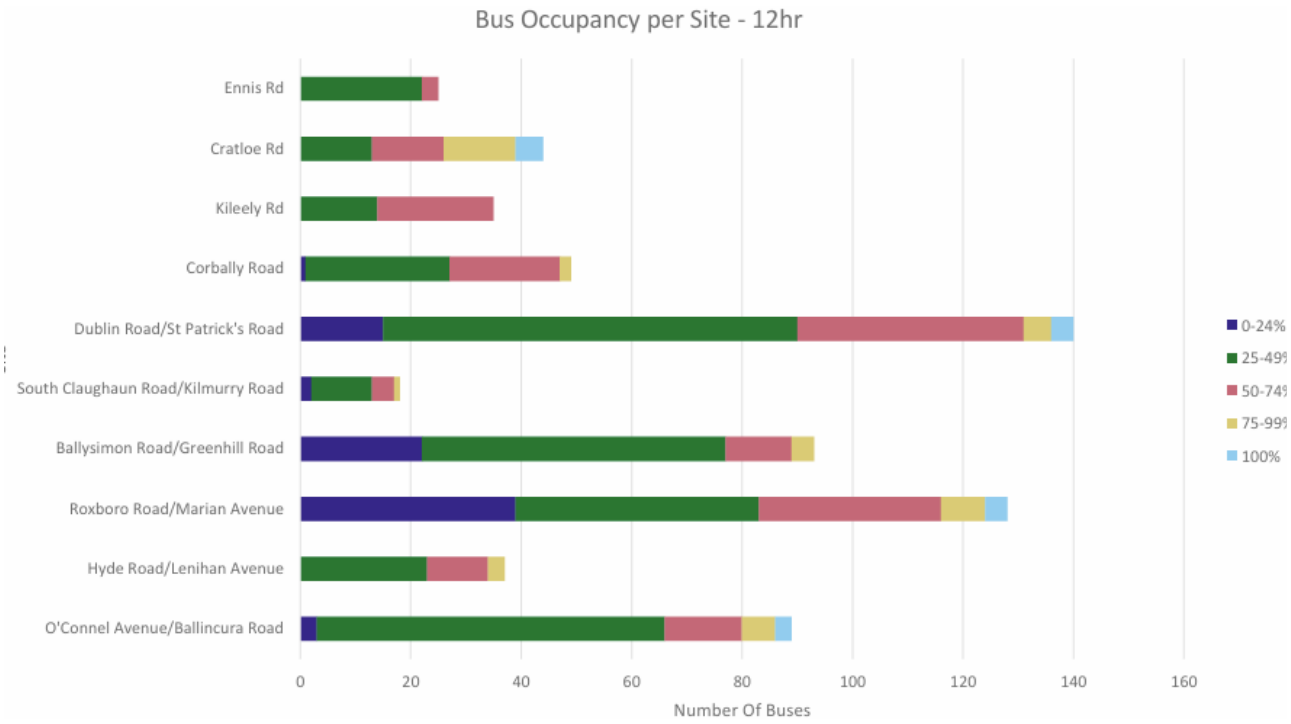
Figure 5.2 Existing Limerick City Bus Services

The Public Transport Accessibility Level (PTAL)[4] analysis for morning peak hours demonstrates that Cleeves is located in an area with a medium level of public transport service, but the application site does adjoin an area of high – medium level.

In terms of capacity, the Limerick City Cordon Survey 2023, provides survey information on the capacity of the bus service in Limerick. Prepared from survey information undertaken in November – December 2023, the survey analyses bus travel and occupancy going into the city centre from 10 no. bus stops

[4] *The Public Transport Accessibility Level (**PTAL**) analysis undertaken by the NTA combines the walk or cycle journey time to a Public Transport stop with the level of service at that stop. It gives an idea of how well connected an area is to Public Transport services.*

located outside a defined city cordon. The study confirms that between 07:00 and 19:00, 53% of buses were at 25-49% capacity. Approximately 12% of buses were at 0-24%. 26% were at 50-74% capacity, 6% were at 75-99% capacity and only 2% were at 100% capacity[5]. Whilst the survey undertaken analyses bus travel and occupancy inbound to the city centre, it is noted that future occupants in Cleeves will likely be travelling outbound from the city centre in the am and inbound to the city centre in the pm, contrary to typical peak flow movements. Figure 5.3 below details the bus occupancy per bus – stop site and the routes where 100% occupancy was reached on limited occasions.



Source: Limerick City Cordon Survey 2023

The level of bus service in Limerick City is due to increase with BusConnects. In December 2023, the National Transport Authority (NTA) published its final new bus network for Limerick. The redesign of the bus network is one of the nine key elements of BusConnects Limerick that aims to transform the City's bus system, making public transport more useful to more people. The key benefits of the new network include:

- An approximate 70% increase in the amount of bus services in Limerick City and its suburbs.
- The extension of bus services to new areas with more routes with frequent services and an enhanced Sunday timetable.
- A new 24 – hour bus service operating between University Hospital Limerick, the City Centre and the University of Limerick.
- Provision of bus services to previously underserved areas such as Ennis Road, Dock Road, University of Limerick North Campus and Ardnacrusha.
- Simpler fares that will make interchange seamless.

The application site is located within close proximity < 700 m to all bus routes. The latest update from the NTA is that "*the new network is scheduled to be delivered on a phased approach from 2027. It will*

[5] *Bus Occupancy surveys were undertaken at 10 bus stops inside the Limerick City Cordon on the day of the survey in order to record the number of people travelling inbound into the city via bus. Manual enumerators recorded both occupancy of the bus at the bus stop, and the number of passengers boarding and alighting.*

be supported by a comprehensive public information campaign for bus users as the services are implemented. As the network is implemented and the new routes are put in place, there may be slight modification made to ensure efficient service delivery." Refer to the accompanying Traffic and Transportation Assessment incl. Mobility Management Plan prepared by ARUP for more information on the existing and proposed public transport at this location.

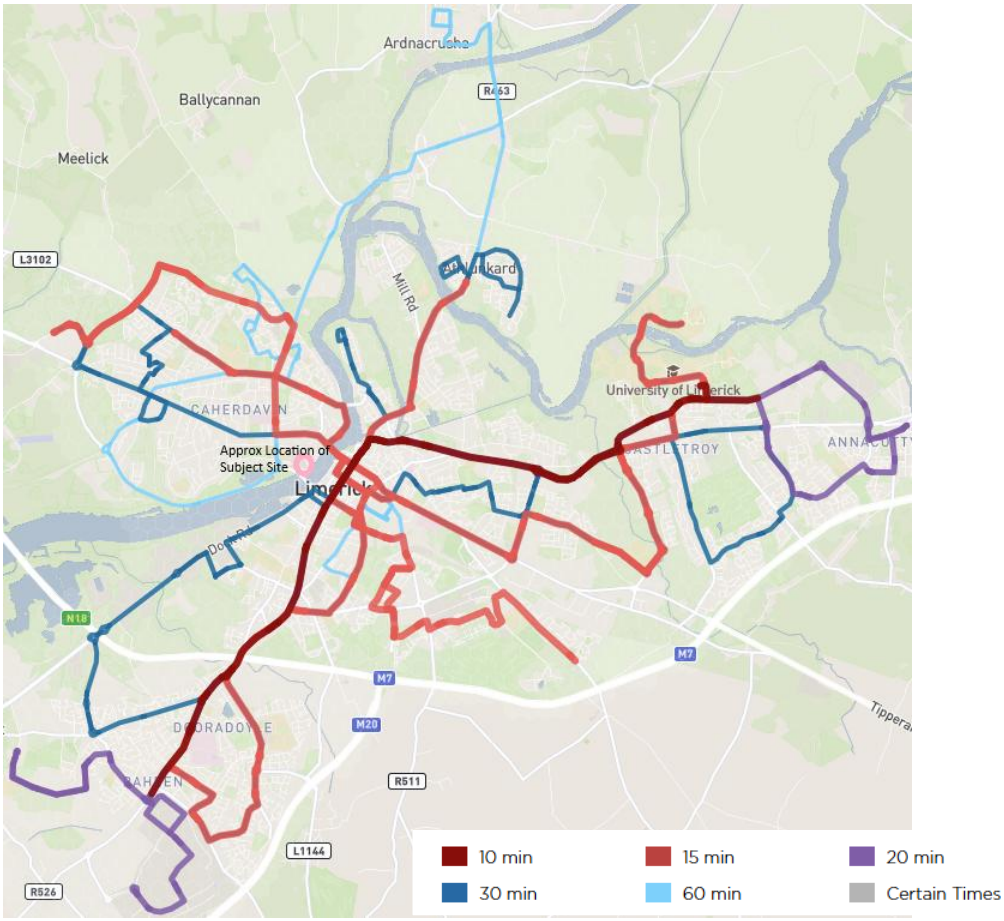


Figure 5.3 Proposed Bus Connects Improved Service

5.2 Description of the Application Site

Section 3.1 of this report has already identified and described the six different character areas defining the application site, including the extent of built structures in each zone.

The 5.10 hectares 'application site' is subdivided into two parts by the North Circular Road with O'Callaghan Strand providing a barrier between the site and the river. The site has three access points including two from the North Circular Road and the third from Stone Town Terrace, a cul-de-sac extending from O'Callaghan Strand. The site (river front) adjoins a Natural Heritage Area and the River Shannon Special Area of Conservation. The site is also proximate to the River Shannon Special Protection Area.

Two structures within the site are designated protected structures; the Flaxmill Building (PS Ref no.264 & NIAH No. 21512053) and the octagonal brick chimney (PS Ref no.265 & NIAH No. 21512059).

Although the application site is brownfield in nature and has been effectively abandoned since 2011, there are a number of existing, temporary uses on the site, including:

- Use of office space by Limerick Treaty Suicide Prevention and Ennis Road Community First Responders
- Storage facilities by a number of businesses, organisations, community groups and charity organisations
- Irish Defence Forces training destination,
- Use of property for film studies and shooting of films,
- Sporting facilities including use of hall in Salesians by a basketball club
- Event management including hosting circus, Scare Factory;
- Use of parts of the site as a contractors compound to facilitate construction projects in the city; and
- Temporary use of Salesians as refugee accommodation for Ukranian war refugees

Whilst most of these uses shall cease on the application site once construction commences, there are users such as the Limerick Treaty Suicide Prevention and Ennis Road Community First Responders, which could continue to use existing retained buildings on site for storage and meeting space purposes, subject to licensing arrangements.

Site levels vary significantly across the application site. The original topography of the application site had a slight gradient from north-west to south-east and a steeper gradient from north to south sloping towards the River Shannon. However, the original topography has been substantially altered by the historical development of the site. The lowest elevations encountered across the site of approximately 1.5 mOD are associated with the disused quarry excavation in the centre of the site. The highest elevations are approximately 14 mOD and are encountered in the north-west of the site (former Salesian's School) and in the north of the site (Stonetown Terrace). Additionally, there is evidence of imported material where the levels across the Stonetown Terrace portion of the site have been raised by approximately 1 to 2 m high.

Ground investigations indicate widespread made ground across the application site located over shallow bedrock. The made ground is generally composed of reworked fill material with variable secondary constituent components. Anthropogenic material was also encountered within the made ground material including red brick, concrete, plastic, and timber fragments. Refer to the ARUP Structural Report under separate cover for further details.

Geo-environmental testing has demonstrated that there is a variable contamination risk across the site. Asbestos was encountered in three samples tested from the Stonetown Terrace portion of the site and hazardous material was encountered in seven locations in the Shipyard portion of the site. Surface water infiltration testing has indicated that there is low permeability within the glacial subsoils where tested.

A stand of Japanese Knotweed was identified on the bank of the reservoir, whilst Himalyan Knotweed was identified in land situated between the Shipyard site and the Condell Road. Both stands are currently undergoing treatment in accordance with an Invasive Species Management & Treatment Plan.

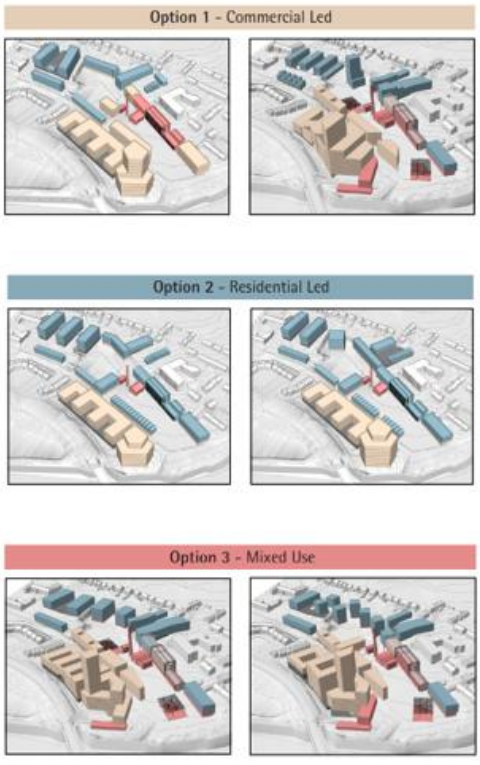
Further environmental considerations pertaining to the application site are provided in the Environmental Impact Assessment Report (EIAR) accompanying the application for approval.

Figure 5.2 Contextual View of Cleeves Site taken from the north west

6.0 OPTIONEERING, CONSULTATION & ENGAGEMENT

The proposed development has benefited from extensive consultation and engagement during preparation of the Masterplan and during the preparation of the planning application.

6.1 Masterplan Options Appraisal



In developing the Masterplan for the site, an options appraisal was undertaken at an early stage to determine the best approach to developing the site. The options commenced with consideration of uses, scale, form and layout as detailed in Figure 6.1. Option 3 comprising a mixed use development was considered most appropriate for the site having regard to the zoning objectives and the objectives for the site as detailed in the Limerick 2030 – An Economic and Spatial Plan for Limerick.

In compliance with the requirements of the Public Spending Code (PSC), a Preliminary Business Case (PBC) was prepared which sought sanction from the Department of Housing, Local Government and Heritage (DHLGH) to proceed to the next “Final Business Case” phase, inclusive of the statutory planning process, detailed design and construction tender preparation.

Figure 6.1 Early Masterplan Options

It is a requirement that the PBC sets out a shortlist of options to meet the project's objectives and determines the single preferred option to be progressed into the next phase. The preferred option should be the most cost-effective means of addressing the project's public policy objectives, based on all relevant qualitative, design, cost and economic considerations.

However, whilst the PBC primarily focuses on cost and economic considerations, it was considered by the applicant that the unique qualities and challenges on the Cleeves site necessitated more in-depth analysis in order to highlight societal benefits not ordinarily captured in the PBC, particularly given the unique qualities of this city centre site and the opportunity to regenerate a site with significant industrial heritage.

Thus, the approach proposed for the PBC was to conduct a weighted Multi-Criteria Analysis (MCA) to include and facilitate comparison of the non-financial and non-economic aspects of the options, as well as financial and economic considerations. An independent panel of experts, including engineers, planners, architects and an estate agent was appointed to conduct the MCA, on five different masterplan options.

Option 2A Commercial

The development proposed 186 no. residential units, 37.199sqm of workspace and 10.039sqm of mixed uses.

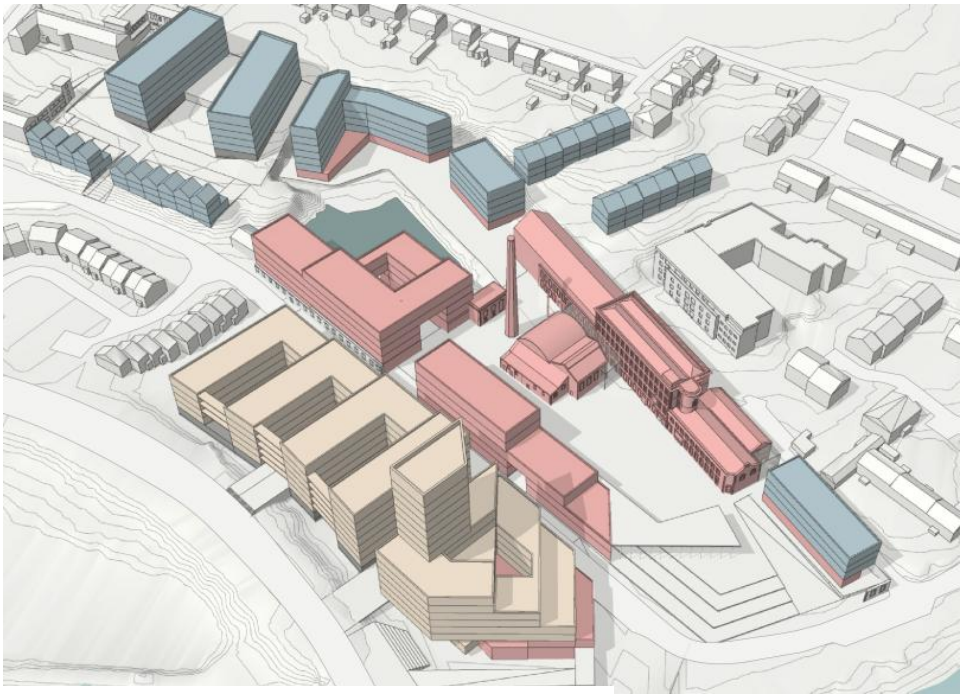


Figure 6.2 Masterplan Option 2A

Key features of the scheme included:

- A larger proportion of the Flaxmill buildings are retained.
- A large area of the curtilage walls are removed including removal of part of the wall along Stonetown Terrace to facilitate emergency access to Stonetown Terrace in the event of a flood.
- St Michaels Rowing Club is relocated and integrated to the Shipyard site development, (outside of the SAC), releasing more of rivers edge for public engagement with the waterside, and facilitating the strengthening of the river walk connection & the marshlands

- Enhanced public realm connection between Condell Rd and the riverside quarter with an upper raised public promenade.
- The arrangements of the housing on the Salesians and Quarry sites optimise the full potential of the areas available and achieve relatively high densities.
- Stonetown Terrace has a lower density of development notwithstanding location of site adjoining Landsdowne Hall.
- The Shipyard workplace configuration offers adaptability for diverse arrangements / tenancies / incremental growth organised around a courtyard garden typology, whilst offering a sustainable amount of parking
- Thin building footprints on the north-south axis facilitate optimum natural daylight & indoor air quality provision and the development of healthy sustainable work environments
- A mixed use adaptable typology along North Circular Rd. which could accommodate diverse workspaces beneath office or residential uses
- An open shared space over the Infiltration Galleries, offers an interactive environment overlooking the reservoir for a work or community hub.

Option 2B Commercial

The development proposed 221 no. residential units, 45,403sqm of workspace and 7,829sqm of mixed uses

Figure 6.3 Masterplan Option 2B

Key features of the scheme included:

- A greater degree of intervention to, and removal of, the heritage buildings which opens up the site more to the city and the river. A large portion of heritage assets are retained and suggested for community use.
- Salesians site remains quite isolated and fails to be integrated into the overall development due to a substantial change in level difference between the Salesian and Quarry site.
- The building on the Quarry site has significant massing when contrasting with the slender form of the Flaxmill.

- Commercial development is prioritised along the North Circular route on the Shipyard, Infiltration Gallery and Flaxmill sites. This approach provides a greater density of development away from the retained existing buildings and in locations deemed unacceptable for residential use due to increased flood risk.

Option 2C Commercial

The development proposed 246 no. residential units, 35,007sqm of workspace and 11,054sqm of mixed uses

Figure 6.4 Masterplan Option 2C

Key features of the scheme included:

- A slightly more enclosed and calibrated civic plaza in the forecourt of the historic Flaxmill is formed and anchored by the heritage buildings, activated by mixed public uses in the heritage and new buildings on its edges.
- Option C proposes keeping the existing levels of the North Circular Road. The implications of this are that ramped, vehicular access is required into the Flaxmill site (for vehicles and pedestrians) and it restricts the type of development that is suitable along the North Circular / Flaxmill site due to the existing flood levels.
- The orientation and location of the residential block on the Quarry site (pulled back from the Quarry edge) provides the opportunity for a Quarry Park to be introduced - a significant external amenity, providing the play provision for the site and a new type of space for the local community. Greater connectivity is facilitated along North Circular Road, providing direct access to the proposed amenity park around the reservoir and facilitating connectivity with the Salesians site.
- The massing of the building neighbouring Landsdowne Hall has been increased, more reflective of its adjoining scale, increasing density in line with national guidance and the Development Plan and providing for additional residential units.

Option 3 Community

The development proposed 142 no. residential units, 3,677sqm of workspace and 16,374sqm of mixed uses

Figure 6.5 Masterplan Option 3

Key features of the scheme included:

- Main Flaxmill buildings are retained to preserve the history of the Cleeves site
- Mixed use Community facilities in heritage & new built fabric support invigoration of local economy & environment
- St Michaels Rowing Club integrated into new Community Boathouse fails to offer a landmark public building as required in the Development Plan.
- Further Education/ Training centre on Shipyard site offers diverse suite of teaching & learning spaces in courtyard garden typology, supporting Community Life-long Learning
- Residential accommodation on the Salesians, Quarry & Stonetown Terrace is limited and does not make efficient use of serviced land.
- No connectivity between Salesians site and the Quarry site with no linkage from the proposed Quarry Park to North Circular Road.

Option 4 Enterprise

The development proposed 114 no. residential units, 18,277sqm of workspace and 11,155sqm of mixed uses

Figure 6.6 Masterplan Option 4

Key features of the scheme included:

- A large portion of heritage assets are retained and suggested for community use.
- No residential development in the Quarry Zone, limits the potential of housing delivery on the site but offers the space as a potential green area..
- The Shipyard workplace configuration offers four discrete buildings for medium and large tenancies, but no landmark feature building.
- A single business tenant is envisaged for the Flaxmill building will create a strong industry character for the retained buildings.
- Emergency access in the event of flooding to Stonetown Terrace is not facilitated as the existing stone boundary wall surrounding the site is retained.

The MCA was conducted on the five masterplan options (2A, 2B, 2C, 3, and 4) in 2021, across nine key criteria and 23 sub-criteria, using a 0–10 scoring scale. Option 2B consistently scored highly, particularly in heritage integration, commercial density, and return on investment. Option 2A also performed strongly, especially in residential amenity and cultural offerings. Option 2C achieved the highest residential density and demonstrated strong phasing potential with good connectivity. In contrast, Options 3 and 4 generally scored lower, particularly in permeability, workspace diversity, and cultural vibrancy, with Option 4 notably constrained by the full retention of the historic boundary wall. The analysis supports a preference for Options A and B due to their balanced performance across heritage, mixed-use integration, and urban design quality.

The Masterplan was advanced using the principles of Options 2B but with greater connectivity and permeability within and through sites. Option 2B was chosen because it provided greater opportunities to maximise residential output and to address the urgent need for housing in Limerick city, including student bedspaces.

Following this process, the masterplan was refined to fully reflect the new development objectives in the Limerick Development Plan 2022 – 2028 (adopted after the Options Appraisal), including an increase in residential unit numbers to provide for greater housing and compact growth.

6.2 Masterplan Consultation

Many different groupings were consulted during the masterplan process including neighbouring residents, sports and recreation groups, educational providers and statutory bodies such as the NPWS, OPW and An Taisce and Limerick City & County Council staff including Conservation Officer, Planners and Senior Management across all departmental types.

A total of 11 no. briefings / workshops were held with targeted stakeholders between February and June 2023. Following 2 no. public consultation events in March 2023, a total of 52 no. written submissions were received from members of the public. The submissions received can be broken down into different categories including:

- 40 no. submissions from the general public;
- 11 no. submissions from groups and associations, Voluntary Bodies, Sports Groups and Business Associations; and
- 1 no. submission from a statutory consultee.

All submissions received during the masterplanning process are detailed in a 'Masterplan' Stakeholder Engagement & Public Consultation Statement of Outcomes Report, which accompanies the application for approval. The submissions were considered by the design team and shaped the proposal delivered at design stage.

6.3 Phase II Detailed Design & Application for Consent

A mixture of public consultation and targeted engagement was undertaken for this stage of the project. There were a number of stakeholders and consultees who have an interest in the site and have thoughts / ideas in relation to how the site should be developed. There were other stakeholders and consultees that had information on the site, which was valuable in shaping the development outcome and design approach. Consultees were identified and all consultation undertaken has been recorded in Table 6.1 below.

Table 6.1 Stakeholder Engagement		
Stakeholder / Consultee Grouping	Member / Grouping	Engagement Type & Date
Limerick Twenty Thirty	Board Members	Continuous
	Internal Sections	Presentation 27th May 2025
Limerick City & County Council	Senior Management	Presentation 03rd June 2025
	Mayor of Limerick	Presentation 03rd June 2025
	Elected Members	Event in Cleeves 04th June 2025
	Departments - Planning (incl Built Heritage)	Meeting on 10th October 2024
	Housing	Meeting on May 6th 2025
	Traffic & Transport including Active Travel	Meeting on 28th November 2024
	Flooding & Riverside	Meeting on 7th November 2024 & 30th May 2025
	Placemaking	Meeting on May 13th 2025
	Climate Action	Meeting on 11th April 2025
Neighbours & Occupants	St. Michael's Rowing Club	Meeting 03rd June 2025
	Salesians Primary School	Meeting 03rd June 2025
	Current Tenants within Cleeves	Meeting 03rd June 2025
	Neighbouring Residents – Stonetown Terrace	Private meeting in Cleeves on 04th June in advance of public consultation event
	Fernhill	
	Clanmaurice Avenue	
	Landsdowne Hall	
Infrastructure & Utilities	Uisce Eireann	Confirmation of Feasibility Received
Community	General Public	Public engagement session with displays on 4th & 5th June 2025
	Those who made submissions on Masterplan	

Issues raised by the technical teams within Limerick City & County Council have informed the design of the overall development, particularly having regard to other ongoing projects in the city including, in particular the proposed Limerick Flood Relief Scheme, Active Travel and the proposed Limerick City Transport Strategy along with the recently adopted Climate Action Plan.

A total of 32 no. written submissions were received from members of the public following the consultation and engagement detailed above and in particular the public engagement sessions on the 4th & 5th June 2025 which had in excess of 160 no. attendees. Many of the submissions were from neighbouring and adjoining residents. Whilst a number of submissions were supportive of the proposal and requested increased height and density, most submissions raised issues of density, massing, scale, along with lack of facilities and opportunities for active recreation. All public engagement and submissions received during the detailed design process are detailed in an 'Outline Sketch Scheme' Stakeholder Engagement & Public Consultation Statement of Outcomes Report accompanying this application for consent.

A number of structured meetings were undertaken with statutory consultees as detailed in Table 6.2.

Table 6.2 Statutory Consultee Meetings		
Targeted Group	Meeting Date	Discussion
Built Heritage Section, Department of Housing Local Government & Heritage	1st Meeting - 03rd June 2025 2nd Meeting - 10th July 2025	No demolition without reuse, heritage to be central, justify removal of boundary wall, need proposals for Flaxmill. Understand that the securing of the surviving historic fabric will form part of the initial building programme and enable the recovery of the key buildings overtime with a diversity of uses. O'Callaghan Strand building to be regraded to be in keeping with the scale, form and materiality of industrial complex. Materials from Fernbank House to be reused in-situ rather than salvaged. Consider re-use/adaptation of Fernbank rather than demolition. Reconsider removal of Victorian Houses, Fernbank House and Infiltration Gallery.
National Parks & Wildlife Service	04th April 2025	Public Lighting strategy important, Compatibility between ecology & proposed designs; Riparian corridor and connectivity strip required for bats; Swift considerations into buildings over 2 storeys; bat slates on Flaxmill; native planting; connectivity to Westfields for bats
Southern Regional Assembly	09th December 2024	Supportive in principle of site redevelopment. Acknowledged urgent need for housing and the need to fast track housing for Stage I.
Office of Public Works	30th May 2025	Discussed Limerick City Flood Relief Scheme with appointed Engineer Designers. Confirmed scheme was an Optioneering Stage and flood levels are similar to what was previously discussed. Flood levels provided from OPW Flood Relief Team. Flooding and associated levels covered in Flood Risk Assessment Report.

6.4 Detailed Design Consultation Outcomes

As already referenced, two reports, namely 'Statement of Outcome' were prepared following completion of the consultation periods for the Masterplan and the Outline Sketch Scheme. The consultation did result in significant design changes to the scheme and did inform the consideration of alternatives on the site.

The proposed development has also been revised to address a number of concerns raised in the submissions received and in particular, the responses from the statutory consultees. These are considered further in the Environmental Impact Assessment Report (EIAR) Chapter 5.0 Examination of Alternatives and Chapter 9.0 Cultural Heritage – Architecture. However, the more significant changes to the proposed development, resulting from public consultation and engagement is summarised hereunder:

Built Heritage

- Elements of the infiltration gallery and the workshops are now not proposed for demolition. They are now excluded from consideration in this Phase of development and will be practically considered in the Phase III TUS application.

- The industrial heritage of the site along with its oral history is to be considered as an integral part of the sites cultural significance, as detailed in interpretative panels integrated into the Landscape & Public Realm plan.
- The Statement of Significance now provides a greater record of the overall institutional complex that comprises Fernhill House and Salesians Secondary School.
- Retention of the Victorian Houses was further considered, with demolition of the structures further rationalised the EIAR Chapter 5.0 Examination of Alternatives and Chapter 9.0 Cultural Heritage – Architecture
- Fernhill House continues to be proposed for demolition and is further rationalised and justified in Chapter 5.0 Examination of Alternatives.
- Greater clarity provided on the existing heritage walls. Whereas full removal was originally proposed, the design has been revised to now provide for partial removal only, thereby maintaining legibility whilst at the same time ensuring connectivity/permeability can still be facilitated.

National Parks & Wildlife

- A site specific public lighting strategy has been devised cognisant of the bat activity on site.
- A connectivity corridor for bats has been maintained within and through the site, to facilitate continuous movement of bats to the Westfield Wetlands.
- Significant biodiversity measures have been incorporated into the design of the scheme as detailed in the EIAR, Chapter 7.0 Biodiversity and incorporated into the Landscape & Public Realm Design proposal.

Phase II Proposed Development Design Considerations

The public consultation and engagement has resulted in an iterative design process for Phase II that has evolved over time. A number of design iterations evolved since selecting Option 2B at preliminary design stage. The four design options considered below for Phase II demonstrates how an optimum design solution was arrived at for Phase II development.

Design 1 - Updated Preferred Option

Following preparation of the Masterplan the preferred option was updated to incorporate a number of changes and enhanced environmental considerations.

- Phased approach to development to focus on urgent delivery of housing in Limerick City.
- Accommodate a diversity of educational uses in an active live/work campus environment. This included consideration of future flexibility to suit the new requirement for teaching and learning environment.
- Incorporation of the Cycle Design Manual 2023 and the more onerous regulations on cycle store layouts.
- Requirement for sprinkler tanks and a second staircase at Salesians.
- Requirement to raise North Circular Road to be reviewed in context of the Limerick Flood Relief Study.
- Car parking strategy to be reviewed in the context of the Sustainable Residential Development and Compact Settlement Guidelines (SRSCGs) and the proposed Bus Connects Plan.
- Air Source Heat Pumps (ASHP's) introduced at roof level as part of sustainability strategy.
- Greater connectivity and permeability

- Retain existing buildings on Infiltration Gallery, North Circular Road and Shipyard plots until future phase confirmed

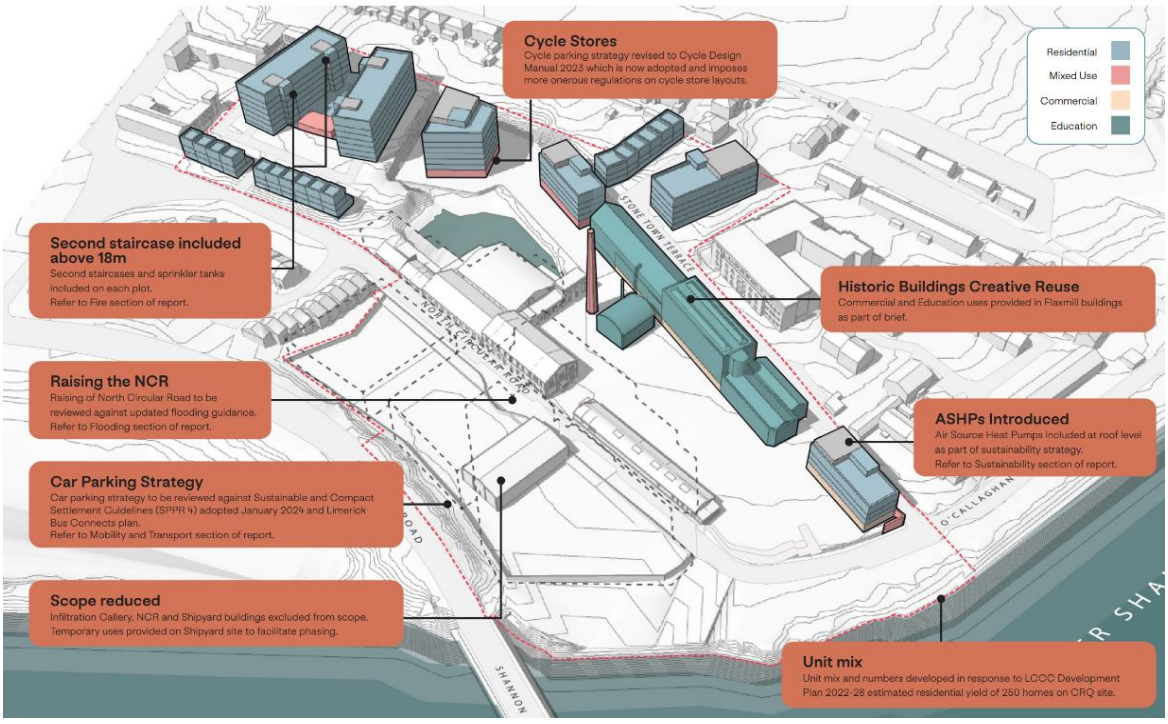


Figure 6.7 Detailed Design Alternative – Option 1

Design 2 – Greater Efficiencies

Delivery of the scheme, viability and the urgent need for housing in the city was more fully considered and led to further changes in the proposed development. This stage followed a signed Memorandum of Understanding between Limerick Twenty Thirty and the Technological University of the Shannon (TUS) to deliver an educational campus. The educational campus will form a separate planning application and is likely to advance whilst the proposed development is being advanced. The Flaxmill and associated historical buildings will undergo a change of use, renovation works and be extended to accommodate commercial uses at the ground floor level with educational use at upper floors. Significant new educational buildings are proposed along North Circular Road as detailed in the Masterplan.

For the purposes of the proposed development (Phase II), the design was amended to accommodate:

- Units with larger floor areas with the sizes of individual units increased by approximately 10sqm.
- Provision of Purpose Built Student Accommodation (PBSA) on the Quarry site to complement the proposed TUS campus.
- A greater mix of one and two bed units at Stonetown Terrace to meet market demand in the city and in compliance with the Housing Needs Demand Assessment in the Limerick Development Plan 2022 – 2028.
- Enhance development to incorporate nature based SUDs measures within the proposed public realm, notwithstanding disposal of surface water to the reservoir on site.
- Optimise the layout and siting of buildings to maximise daylight and sunlight and reduced overshadowing in accordance with relevant guidelines.
- Maintain biodiversity and integrate bat houses into the design proposal.
- Exclude the Flaxmill building from the proposed development having regard to separate advanced, ongoing stabilisation and repair works and the proposed Phase III application by TUS.

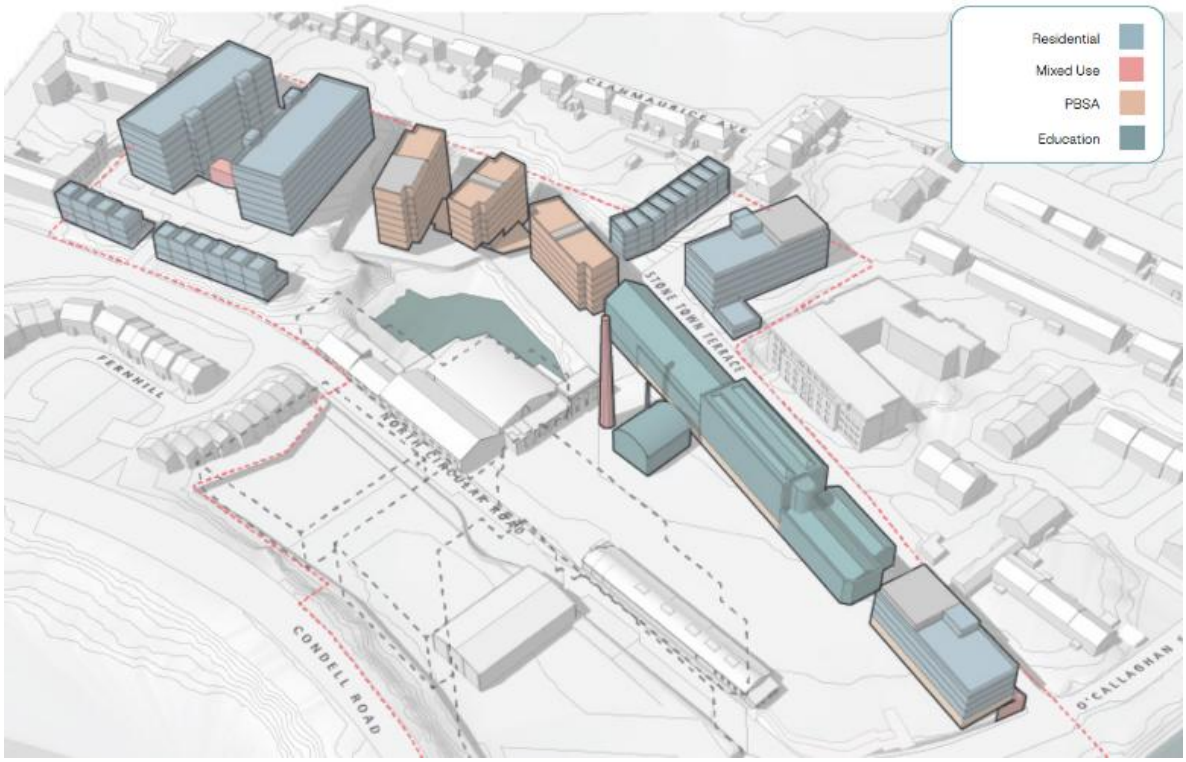


Figure 6.8 Detailed Design Alternative – Option 2

Design 3 – Further Refinement Proposed Development

Following detailed consideration of the proposed development which included St. Michael's Rowing Club and relocation of the club's premises to facilitate public realm enhancement works along the riverside, it was concluded that it would be necessary to apply for a Marine Area Consent (MAC) in advance of seeking consent from An Coimisiun Pleanála. Given the timescale associated with securing a MAC and the urgency associated with the delivery of housing in the city, it was agreed to delay this element of the proposed development to Phase III and the application associated with the advancement of the TUS Campus

This design scenario sought to further optimise the proposal by:

- Reducing the height of buildings in proximity to Clanmaurice Avenue, from seven to six storeys, but yet maximising the number of residential units on site to facilitate compact growth.
- Incorporate Meanwhile Uses on the Shipyard site pending delivery of Phase IV of the Masterplan.
- Reduce car parking provision to a rate of 0.3 spaces per unit having regard to the city centre location, thereby promoting more sustainable modal choices.
- Reduce the finished floor level of the buildings at Stonetown Terrace by 2m to +9.00m and relocate the apartment building 2.5m further to the west to ensure adequate daylight and sunlight to the existing apartments in Landsdowne Hall and the houses in Clanmaurice Gardens / Terrace, thereby ensuring no adverse impact on the residential amenity of the area.
- Minimise and control provision of lighting along bat foraging routes in the interests of maintaining biodiversity and to ensure no impact on protected species.
- Incorporate green roofs in space not occupied by roof plant.

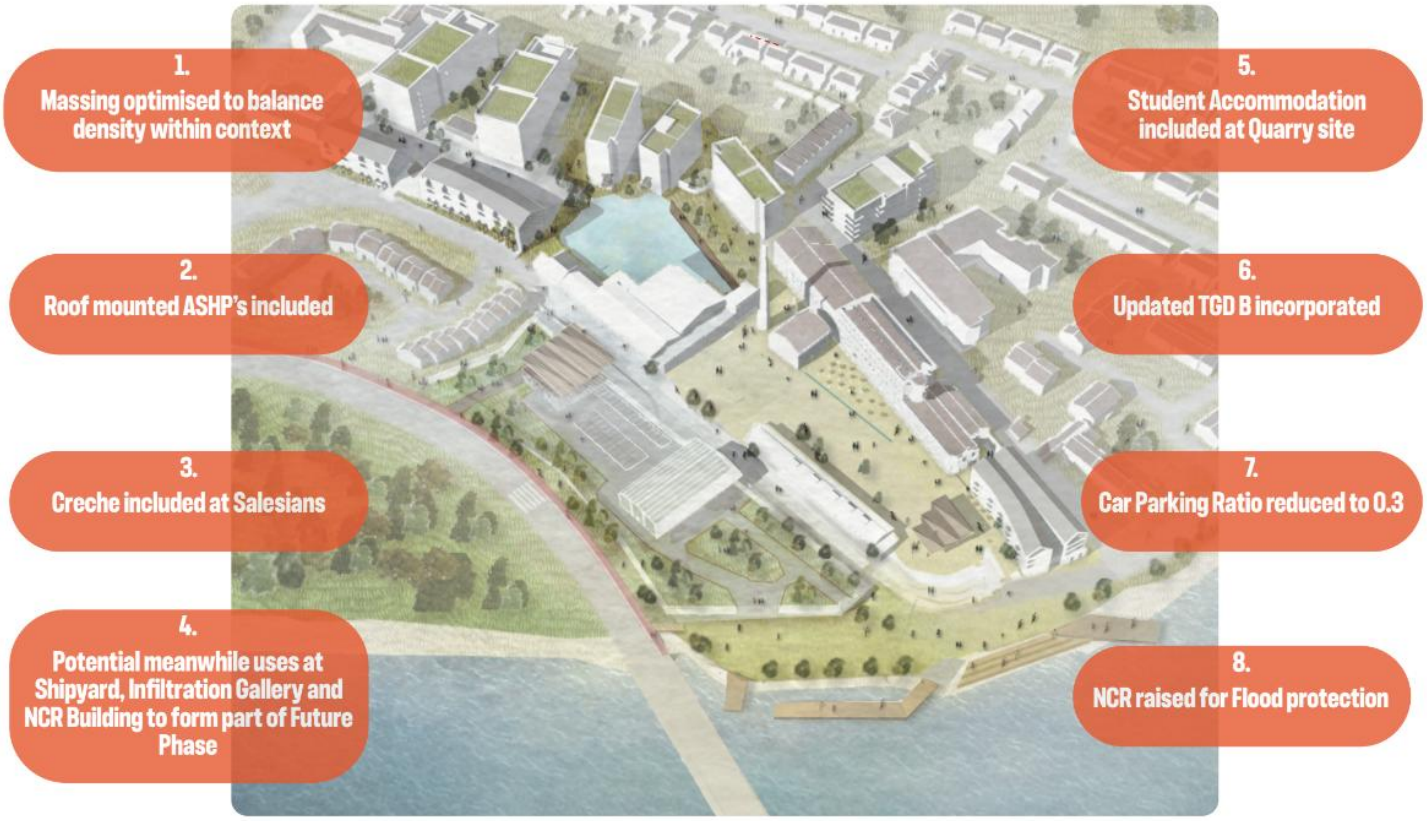


Figure 6.9 Detailed Design Alternative – Option 3

Final Design

The final design of Phase II presents the most effective utilisation of this significant site, fulfils the requirements of the Limerick Development Plan 2022 – 2026 with respect to Objective CGR03 and provides for much needed housing in the city, whilst realising a phased approach to development on a strategic, city centre site, all in accordance with the principles set out in the Cleeves Masterplan. To summarise it is considered that the final layout:

- Advances the strategic and statutory objectives applicable to these lands and the wider area.
- Provides and enables significant stabilisation and repair work to protected structures and significant heritage buildings on site.
- Peels back and demolishes buildings of less significance, which currently hinder the appearance and functionality of the site.
- Optimises development space within the overall site, in an efficient and sustainable manner.
- Facilitates and promotes greater modal choice through minimising on site car parking and permitting / developing connectivity and permeability throughout and within the development.
- Facilitates ready access to all parts (character areas) of the development and the future development of Phase III and Phase IV works as detailed in the Masterplan.
- Avoids significant environmental impacts.
- Enables extensive economic development through employment created at construction stage and enables future employment on the site with Phase III and Phase IV works.
- Provides much-needed housing in the city centre which is characterised by slow housing growth.

Overall, the extensive optioneering, consultation and engagement undertaken from project inception has helped to refine the project design to better integrate with the existing environment and meet the specific requirements of the area. It has also sought to foster a more collaborative and positive relationship with the community and stakeholders, reducing conflicts and increasing transparency.

7.0 PROPOSED DEVELOPMENT

Cognisant of the fact that the proposed development is largely within an industrial heritage site, with the exception of Salesians, the development seeks to work with the existing Cleeves factory buildings to provide an industrial 'axis' that will support a new transformative programme of mixed uses linking the river with the Quarry / Reservoir site beyond. The development intends to capture and reveal the memory of the site as an important site of production within Limerick City and bring a unique meaning to the public and community environments in the interfaces between new and old, promoting opportunities for activation of both the existing building environment as well as the new public realm.

The dominant cliff face, the old reservoir and the post-industrial early succession vegetation make this site unique. The Flaxmill complex and its rich industrial heritage is at the heart of the proposed development and establishes the core Public Space of the Cleeves Riverside Quarter. The approach seeks to preserve one of the most significant Flaxmills in Northern Europe for new life.

7.1 Description of the Proposed Development

The description of development as per the public notices seeks planning approval for:

A. Demolition of a number of structures to facilitate development including (i) Salesians Secondary School and Fernbank House; (ii) 2 no. houses on North Circular Road; (iii) Residual piers from the basin of the reservoir; (iv) Upper Reservoir on Stonetown Terrace comprising 2 no. concrete water tanks, pump house and liquid storage tank; (v) 1960's lean-to building structures adjoining the Cold Store (former Weaving Mill); (vi) remaining fabric of c20th rear lean-to of the Flaxmill Building; (vii) c.1960s office building adjoining the Packing Store and Cheese Plant on North Circular Road; (viii) Cluster of buildings including altered part of the Linen Store, the former Linen Store, Storage Building, and Office/Lab building at O'Callaghan Strand / Stonetown Terrace with partial retention of existing stone wall; (ix) warehouse on the Shipyard site; and (x) partial removal of stone boundary wall defining the Cleeves site adjoining O'Callaghan Strand / Stonetown Terrace and around the Shipyard site.

B Construction and phased delivery of:

i. Residential Development in 4 development 'zones' within the site ranging in height from 3 – 7 storeys (with screened service plant at roof level) comprising; (a) 234 no. residential units; (b) 270 no. student bedspaces with ancillary resident services at ground floor level; (c) 299sqm of commercial floorspace; and (d) a creche. The specific development details of each proposed development zone comprise the following:

- Salesians Zone – 1 no. building with 2 no. blocks extending to 6 and 7 storeys comprising 146 no. apartments (76 no. 1 bed; and 70 no. 2 bed); a creche; semi basement car and bicycle parking; reception area, plant rooms, and refuse storage, with screened external plant and photovoltaic panels at roof level; 20 no. 3 storey 3 bed triplexe units with photovoltaic panels at roof level; and 30 no. car parking spaces for the dedicated use of the adjoining Salesians Primary School.

- Quarry Zone – 1 no. Purpose Built Student Accommodation (PBSA) building with 3 no. blocks extending to 6 and 7 storeys comprising 270 no. bedspaces with study rooms, shared areas, exercise room, reception area, plant rooms, refuse storage and bicycle parking all at ground floor level and screened external plant and photovoltaic panels at roof level. Provision is made for telecommunication antennae on the roof top of one block. Consent is also sought for use of the PBSA accommodation, outside of student term time, for short-term letting purposes.
- Stonetown Terrace Zone – 1 no. building extending to 4 - 5 storeys comprising 38 no. apartments (6 no. studios; 12 no. 1 beds; and 20 no. 2 beds) with plant rooms and refuse storage at ground level, ancillary infrastructure at basement level at northern end of the block, with screened external plant and photovoltaic panels at roof level; 9 no. 3 storey 3 bed townhouses with photovoltaic panels at roof level; and a dedicated secure bicycle storage facility.
- O'Callaghan Strand Zone – 1 no. building extending to 4 / 5 storeys comprising 21 no. apartments (9 no. 1 bed and 12 no. 2 bed) with an open roof structure accommodating communal open space, plant and photovoltaic panels; and 299qm of commercial ground floorspace intended to accommodate Class 1, Class 2 and / or Class 3 uses, with provision for car parking in the undercroft.

ii. Dedicated mobility hub with canopy and photovoltaic panels including double stacker bicycle parking; and EV Charging spaces, within the Shipyard Zone. A dedicated pedestrian/cycle link connects North Circular Road with Condell Road. The remaining area of the zone shall accommodate temporary car parking and a temporary external event space to be used on a periodic basis as the need arises, pending future redevelopment proposals as detailed in the Masterplan (Stage IV).

iii. Extensive provision of Public Realm including creation of the Reservoir/Quarry Park, the Flaxmill Square and the Riverside Corridor. Significant areas of civic and green spaces are provided, incorporating formal and informal play space; nature based SuDs, permeability and access; and a riverside canopy with photovoltaic panels functioning as an outdoor event space and incorporating heritage interpretative panels

iv. 3 no. dedicated bat houses;

v. Telecommunication antennae on roof of Block 2A of the PBSA, including (a) 9 no. Support poles to support 2 no. antennae each; (b) 6 no. microwave dishes affixed to the plant screen; and (c) associated telecommunications equipment and cabinets (effectively screened). To facilitate technologically acceptable locations at the time of delivery, a micro-siting allowance of 3m is proposed on the roof top of Block 2A of the PBSA for the infrastructure.

vi. Provision of vehicular access/egress points including (a) utilisation of existing access points to the Salesians Zone, to the Flaxmill and Quarry Zones and to the Mobility Hub on the Shipyard Site Zone; (ii) reopening an existing (currently blocked) access point off O'Callaghan Strand; (iii) new access points to the proposed undercroft carparking at Salesians from the North Circular Road and at the end of Stonetown Terrace road which provides access to the Stonetown Terrace Zone; and (iv) emergency access only from Stonetown Terrace to the Flaxmill Zone;

vii. Provision of 30 no. dedicated car parking spaces to serve the Salesians Primary School; and

viii. All ancillary site development works including (a) water services, foul and surface water drainage and associated connections across the site and serving each development zone; (b) attenuation proposals; (c) raising the level of North Circular Road between Fernhill and O'Callaghan Strand; (d) refuse collection store (e) car and bicycle parking to serve the

development; (f) public lighting; (g) all landscaping works.; and (h) temporary construction measures including (i) construction access to the Quarry site including provision of a temporary access across the reservoir; and (ii) temporary use of onsite mobile crusher.

Table 7.1 Development Statistics		
No. of Residential Units	234 no. units	
	Apartments 205 no.	Townhouses & Triplexe Units 29 no.
Unit Mix Studio 1 bed apartment 2 bed apartment (3 person) 2 bed apartment (4 person) 3 bed townhouses & Triplexe Units	Number 6 97 98 4 29	Percentage 2.5% 41.4% 41.8% 1.7% 12.3%
Number of Student Bed Spaces	270 no. bedspaces[6]	
Creche Area	381sqm Capacity for 34 no. children	
Commercial Floorspace	299sqm	
Site Area Gross	5.09 hectares gross	
Site Area Net	2.63 hectares[7]	
Density	117 units per hectare	
Floor Area to be Demolished	11,000sqm GIA	
Gross Floor Area	33,877sqm	
Building Height	3 - 7 storeys	
Plot Ratio	0.8 (net site area)	
Site Coverage	25% of net site area	
Public Open Space	7,817sqm of public realm (15.3% of total site)	
Communal Open Space	12,419sqm	

Based on the key principles set out in the Limerick Development Plan 2022 - 2028, Feilden Clegg Bradley Studios and Bucholz McEvoy Architects have developed a comprehensive design for the application site. Full details of the proposed development can be found in the plans and drawings accompanying the proposed development. The Site Layout comprising the proposed development is detailed in Figure 7.1 and seeks to achieve a high quality mixed use development, with an immediate focus on the delivery of residential units, all in accordance with the requirements of the Development Plan.

[6] *4 bed spaces equate to 1 no. residential units as per definition provided in the Sustainable Residential Development & Compact Settlement Guidelines*

[7] *Excludes Shipyard Site, Riverside Site, North Circular Road, Infiltration Gallery and Flaxmill as these are not intended for residential use. It includes 0.78 hectares of public realm*


STONETOWN TERRACE
SALESIANS
QUARRY
RESERVOIR
INFILTRATION GALLERY
FLAXMILL
STONETOWN TERRACE
FLAXMILL PLAZA
FERNHILL
NORTH CIRCULAR ROAD
O'CALLAGHAN STRAND
CONDELL ROAD
SHIPYARD
ST. MICHAEL'S ROWING CLUB

7.2 Demolition

Building reuse and retention of historic fabric and features is being led by a conservation philosophy, guiding the retention, consolidation, repair and reuse of the historic structures as part of a multi-phase development spread across Phases I, II and III. All demolition has been considered in the context of the Architectural Heritage Protection – Guidelines for Planning Authorities (DEHLG) and Shaping the Future. Detailed information has been submitted with the application for approval, including:

- All works comprising proposed reconstruction, alteration or extension have been marked or coloured on the drawings to distinguish clearly between the existing structure and the proposed work (Article 23(2), of the Planning & Development Regulations 2001);
- Annotated survey drawings have been provided to clearly distinguish what is being retained and what is being removed.
- An architectural heritage impact assessment is detailed in Chapter 9.0 Cultural Heritage - Architecture of the EIAR.
- A Statement of Significance includes an historic analysis and an assessment of heritage significance for each of the structures of the complex. It describes each structure relative to the phasing of the site and its value relative to the protected structures on the Record of Protected Structures (RPS); and
- Building Record Reports for the Engine House & Boiler House; the Infiltration Gallery; the Dairy Building; the Workshop; Cheese Plant; Admin Building; Semi -Detached Houses and Fernbank House to include a description of the existing building fabric, a record of the building and recommended mitigations in order to complete the building record; and
- Section 3.0 of the Architectural Design Report provides an historic fabric assessment of the structures to be demolished, necessary to facilitate delivery of the proposed development and the wider masterplan

Demolition is proposed as detailed in Figure 7.2 to enable the regeneration and redevelopment proposal and is led by the findings. Demolition involves the removal of parts of structures as well as the removal of whole structures.

“Protection”, in relation to a protected structure or part of a protected structure is defined in section 2 of the Planning and Development Act 2000, as amended, as including “conservation, preservation and improvement compatible with maintaining the character and interest of the structure or part.”

The assessment has carefully considered all structures within the curtilage of the protected Factory Complex and Chimney Stack. The former factory site includes structures and features from 1833 up to the early 21st century. Within the curtilage of the Cleeves complex, it is necessary to set out the distinction between structures that inform the special interest of the protected structures. The Statement of Significance does this. Not all the structures and features present on the Masterplan site inform the special interest of the protected structures. This is an important distinction. The complete demolition of structures that fall under the definition of protected structures must be subject to S57(10) which states:

> “*A planning authority, or the Board on appeal, shall not grant permission for the demolition of a protected structure or proposed protected structure, save in exceptional circumstances*.”

Further to the above, the application of 'exceptional circumstances' is interpreted as arising when whole structures are demolished[8]. In the case of the Phase II works, there are two complete structures are identified for demolition:

- Building no.14 - Semi-detached houses – table 23
- Building no.10 - Office and laboratory – table 17

These are assessed in detail within this Chapter 9.0 of the EIAR, and the Chapter demonstrates that the requirement for exceptional circumstances has been met. While elements of other structures are identified for removal, the scope of fabric to be demolished does not constitute the complete demolition of the asset or substantial loss of significance. These are considered within the assessment but are not categorised as complete demolition and therefore do not need to meet the 'exceptional circumstances' threshold.

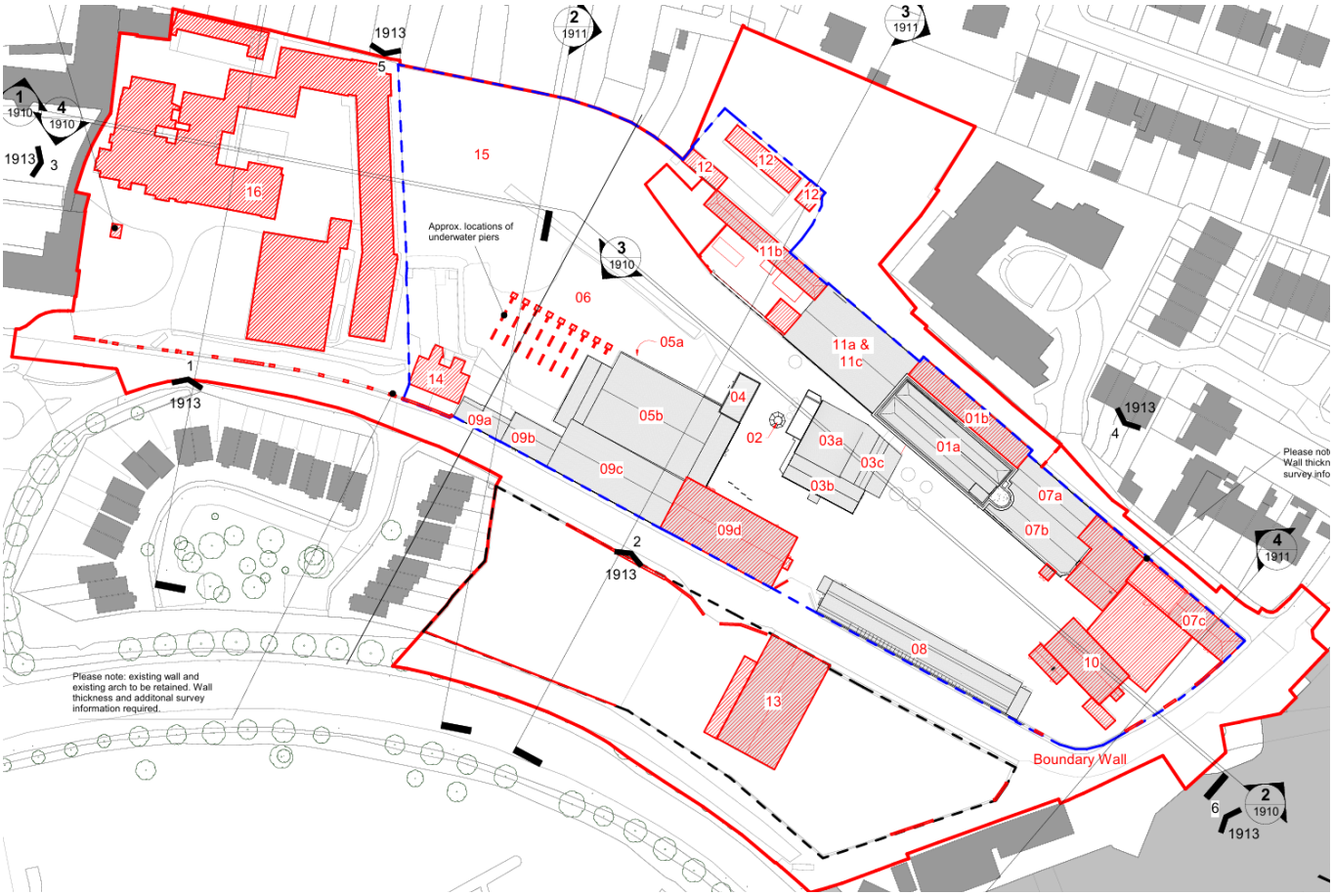


Figure 2.8 Buildings Proposed for Demolition highlighted in red with buildings to be retained identified in grey

A Pre-Demolition Waste Audit Report was prepared by AtkinsRealis identifies key demolition arisings and evaluates opportunities for reuse and recycling in accordance with Circular Economy (CE) principles and the waste hierarchy. This Audit informed the Circular Economy Statement (CES) prepared by ARUP to reduce resource use and waste generation associated with the construction and

[8] Sherwin v An Bord Pleanála and CWTC Multi Family ICAV [2024] IESC 13). The Supreme Court found that the High Court erred in its interpretation of Sub-section 57(10(b) and that the requirement for 'exceptional circumstances' in relation to demolition of a 'protected structure' in Sub-section 57(10(b) is not triggered by the proposed demolition of a part of a protected structure.

operation of the proposed development and to promote regenerative design in the proposed development.

A Construction and Demolition Resource and Waste Management Plan (CDRWMP) was also prepared by ARUP outlining how waste from the construction and demolition will be managed to minimize environmental impact.. It details strategies for waste prevention, reuse, recycling, and proper disposal, ensuring resources are used efficiently and waste is handled responsibly throughout the project lifecycle.

Salesians Site

The totality of the Salesians school and Fernbank House (Ref.16) are to be demolished to enable construction of 146 no. apartments, 20 no. triplexe units and a creche, with 1,073sqm of communal open space and car parking. The existing 2 – 3 storey structure, with a gross floorspace of 5,989sqm wraps around the perimeter of the school site, with car parking dispersed throughout and no notable external amenity space. Demolition of the building is necessary to facilitate compact growth and the provision of apartment units in compliance with the Sustainable Urban Housing Design Standards for New Apartments 2025. Building Recording of Fernbank House has been undertaken and accompanies the application for approval having regard to its historic fabric and to salvage and reuse material on site where feasible and practical. An Architectural Heritage Assessment of Fernbank House is appended to Chapter 9.0 Cultural Heritage Architecture.

The Salesians Site currently accommodates a former secondary school, currently used for the temporary accommodation of Ukranian refugees, a Sportshall and Fernbank House, a former private dwelling which has been much altered and extended to meet the needs of the school. The house, though of heritage value, is not listed as a protected structure, is not included on the Record of Protected Structures; and is not included on the NIAH inventory. 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 Architectural Design Report accompanying the proposed development explored options for reuse of the building. It 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. In the interest of making the most efficient use of serviced urban land within the city centre, it was considered that the resulting low density development over four stories only, would not result in an optimum design or density solution for this city centre site.

Quarry Site

Two houses (Ref.14) fronting onto North Circular Road are to be demolished to facilitate pedestrian and cycle access to the Cleeves site, and in particular, the public amenity offering provided by the reservoir in the Quarry area. This access facilitates the only pedestrian connectivity point between the Cleeves and Salesians site, thereby enhancing permeability within the development. Demolition of the houses will also provide a direct temporary construction access into the site. The two storey houses have a gross floorspace of 285sqm and are in need of substantive repair. It is proposed to undertake Building Recording having regard to their historic fabric.

The reservoir context is to be reinvigorated as a new public open space with the removal of circa 1950 residual piers from within the basin (Ref 06).

Stonetown Terrace Site

It is proposed to demolish the Upper Reservoir at Stonetown Terrace (Ref. 12). This includes the two concrete water tanks (approximately 3m deep), pump house and liquid storage tank. There is a suspended RC walkway over the tanks that is in poor condition and has failed at one section. The pump house has a roof covered with asbestos sheets and a small masonry storage building beside the tanks is covered in asbestos sheeting. A masonry walled building with a timber truss roof and rusted tin sheet roofing is also to be demolished. The building is two storeys from the lower Flaxmill Plaza part of the site and one storey from the higher Stonetown Terrace. This demolition will facilitate the construction of 38 no. apartments and 9 no. townhouses with 380sqm of communal open space and associated car parking.

Further, demolition of a 1960's lean-to building structures (Ref. 11b) adjoining the Cold Store (former Weaving Mill) is proposed. The weaving building is largely derelict and has been the subject of substantial change after 1927. As part of the permeability and urban connectivity strategy the scheme proposes to open up part of the masonary façade to create a pedestrian link, offering connectivity between Stonetown Terrace and the Flaxmill Plaza. This route also allows for emergency vehicle access to the proposed PBSA buildings on the Quarry site. The remaining area of wall will provide a representative samples of surviving elevation.

Flaxmill Plaza Site

The c20th rear lean-to of the Flaxmill Building is to be demolished (Ref 01b). The upper storey and roof of the rear lean to shall be demolished as part of stabilisation and repair works to the Flaxmill undertaken as part of Phase I of the Masterplan. The remaining ground floor of the extension is to be demolished to provide for access to the upper site from Stonetown Terrace. Its removal will reveal the currently closed off north elevation of the main mill.

The c.1960s reinforced concrete frame office building (Ref. 09d), which adjoin the Packing Store and Cheese Plant, is to be demolished. The roof covering of this building appears to comprise asbestos sheeting. The surviving fragment of an earlier stone built single storey element (1853 façade) that addresses the North Circular Road is to be retained.

The existing low wall and railings on North Circular Road are to be removed.

O'Callaghan Strand Site

Comprising a cluster of 4 no. buildings, the altered part of the Linen Store, the former Linen Store, Storage Building, and Office/Lab building at O'Callaghan Strand / Stonetown Terrace, will have selected demolition.

The roof, walls and slab of the Linen Store (Ref. 07c) are to be demolished, with retention and reuse of the external stone walls onto Stonetown Terrace and O'Callaghan Strand. The much altered single storey building (Ref. 07c) between the linen store and the offices is to be demolished with the wall onto Stonetown Terrace to be partially retained. It is necessary to remove some of the wall to facilitate emergency vehicular access to the Flaxmill Plaza in the event of a flood. The later c20th storage building and office/lab building are to be demolished (Ref. 10).

The existing wall at O'Callaghan Strand will be lowered to 450mm above ground level with total removal where there are entrance/building locations identified.

The area of structures to be demolished is circa 1,580sqm and this is necessary to facilitate the construction of 21 no. apartments and 236sqm of communal open space at roof level and 299sqm of commercial floorspace intended to activate the Flaxmill Plaza. This demolition will also facilitate vehicular emergency access from Stonetown Terrace to the Flaxmill Plaza and North Circular Road in the event of a flood.

Shipyard Site

It is proposed to demolish the 1990s reinforced concrete structure (Ref. 13) on the Shipyard Site with a gross floor area of 770sqm. The existing stone wall around the Shipyard site adjoining North Circular Road is to be retained with partial demolition for access to proposed mobility hub and two new openings are to be provided in the wall between the Shipyard site and the riverside in a previously altered part of wall.

Chapter 9.0 Cultural Heritage – Architecture of the EIAR considers these demolitions in the context of an Architectural Heritage impact assessment.

7.3 Residential Development

The proposed development provides for the equivalent of 302 no. residential units, including 234 no. apartments, triplexe units and townhouses; and 270 no. purpose built student accommodation bedspaces. With regard to all dwellings, the approach and access to circulation, and sanitary facilities within, are designed to comply with Technical Guidance Document Part M (2022). Universal design principles are integrated within all aspects of the Salesians, Stonetown Terrace and O'Callaghan Strand residential areas, designed to promote inclusivity and accessibility for residents and visitors of all age groups and levels of ability / mobility. In addition to these principles,20% of the residential units within the development have been designed to comply with the guidelines for "UD Homes" Standard in accordance with the "Universal Design Guidelines for Homes in Ireland" (published by the National Disability Authority, Centre for Excellence in Universal Design).

Salesians Zone

Salesians will create 166 no. new homes for Limerick. The apartments are made up of one-bedroom two-person apartments (46%), two-bedroom four-person apartments (42%) and three-bedroom five-person back-to-back triplexes (12%).

The southern part of the Salesians site is framed by 20 no. three storey, three bed triplexe units fronting onto North Circular Road, all incorporating and benefiting from the level difference between the road and the site. The units addressing North Circular Road have a finished floor level (FFL) of 6.3m, whilst the units facing the block of apartments have a FFL of 10m Each unit is provided with private amenity space and dedicated bin storage with PV panels provided at roof level. The terrace of housing is effectively broken with vehicular access into semi – basement carparking accommodating 45 no. car parking spaces, inclusive of 7 no. EV spaces. Adjoining the car parking is undercroft storage for 280 no. bicycles with dedicated cycle access off the vehicular ramp to the apartment blocks to the rear. Additional external bicycle parking provision is accommodated immediate north of the triplexe units, providing an additional 83 no. visitor parking spaces.

To the rear of the triplexe units, accessed directly from the North Circular Road is a proposed building with two blocks comprising seven storeys to the south and with six storeys at the northern end facing Clanmaurice Avenue. The FFL of the apartment block to the south is 10m, increasing to 13.6m to the north. Generally situated circa 40m to the south of the houses on Clanmaurice Avenue, the building is situated 31.8m from one dwelling on Clanmaurice Avenue with a rear protruding extension The building, which comprises two separate blocks – Block A to the west and Block B to the east each accommodates plant, bin storage and sprinkler tanks at ground floor level. In total, the two blocks accommodate 76 no. one bed apartment units and 70 no. two bed apartment units, all with private amenity open space. Provision is made for 4 no. accessible car parking spaces at surface level. PV panels and green roofs dominate both roof tops. Air Source Heat Pumps (ASHP) are provided at roof level on Block A and will be surrounded by a perimeter perforated metal screening which will have an acoustic performance function, as well as visually screening the plant.

Quarry Zone

This zone comprises 1 no. Purpose Built Student Accommodation (PBSA) building with 3 no. wings extending to 6 and 7 storeys comprising 270 no. bedspaces and 1,377sqm of communal amenity space, with a finished floor level of 6.2m. Communal spaces include a reception area, space for informal social interactions and meetings, touchdown spaces, spaces for individual and shared study and multipurpose space for small seminars. Communal services facilities include managers / security office, laundry facilities, centralised storage, facilities for handling, storage and collection of refuse. The disposition of the student accommodation on the site balances the provision of amenity space with optimum orientation in terms of daylight and sunlight, with the provision of a continuous public path along the reservoir.

The proposed PBSA comprises 36 no. clusters ranging in size between 4 – 8 bedrooms, including:

- 1 no. 4 bed cluster;
- 7 no. 5 bed clusters;
- 5 no. 6 bed clusters;
- 1 no. 7 bed clusters;
- 22 no. 8 bed clusters; and
- 18 no. studios.

Within the clusters, provision has also been made for 7 no. universally accessible rooms. The Schedule of Accommodation accompanying the proposed development provides a detailed breakdown of floor areas within each cluster.

The West Wing comprises seven stories. It includes a study room, storage area, ancillary plant rooms and bed spaces at ground floor level and six stories of student bedspaces and shared communal areas. The roof comprises screened external plant including ASHP and an array of telecommunications masts. The ASHP plant and other roof plant is surrounded by a perimeter perforated metal screening which will have an acoustic performance function, as well as visually screening the plant.

The Central Wing comprises seven stories. This wing includes a reception area and a significant shared communal space, with external seating / amenity space at upper ground level and six stories of student bedspaces and shared communal areas. The roof mainly comprises PV panels with a portion dedicated as a green roof.

The East Wing comprises six storeys. It has an exercise room, laundry room, ancillary plant rooms and also accommodates refuse storage areas at upper ground floor level with five stories of student bedspaces and shared communal areas. The roof comprises a green roof.

Two external terraces are provided at first floor level, proving a link between the Central Wing and both the East and West Wings. The PBSA is also served by 730sqm of external communal open space, 8 no. car parking spaces and 62 no. bicycle parking spaces.

Stonetown Terrace Zone

The Stonetown Terrace site will necessitate the construction of a retaining wall on its boundary to the north, east and west. The proposed five storey apartment block on the eastern boundary of Stonetown Terrace, neighbouring Landsdowne Hall has a finished floor level of 9.5m. It comprises 38 no. apartments including 6 no. studios; 12 no. 1 beds; 2 and 20 no. 2 beds, with bin storage and associated plant at ground floor level. Provision is made for 86 no. bicycle storage spaces and an additional 4 no. cargo bikes in a dedicated, secure bicycle storage facility. The roof comprises screened external plant including ASHP and PV panels. The ASHP plant and other roof plant is surrounded by a perimeter perforated metal screening which will have an acoustic performance function, as well as visually screening the plant. Some 380sqm of communal open space is provided to serve the apartments and the townhouses.

The 9 no. three storey, three bed town houses with a finished floor level of 9.5m, flank the western site boundary of the zone. The townhouses have their own dedicated rear gardens which are separated from the gardens of houses in Clanmaurice Avenue by a retaining wall. Bicycle parking is facilitated on curtilage and the houses are serviced by individual ASHP's situated in the rear garden of each property. The roofs benefit from panels.

In addition to bicycle parking provided within the apartment block, provision is made for an additional 27 no. external bicycle spaces for visitors inclusive of 3 no. cargo bike spaces. A total of 14 no. parking spaces have been accommodated in this zone.

O'Callaghan Strand Zone

This zone comprises 1 no. building extending to 4 / 5 storeys comprising 21 no. apartments including 9 no. 1 bed and 12 no. 2 bed) units, with a finished floor level of 5.7m. The building has a non-thermal, non-airtight pitched covering over the roof with open air joints in roof panels accommodating communal open space and plant. The roof valley has PV panels the roof pitch facing south west. The northern half of the roof space accommodates ancillary plant with ASHP's whilst the southern half of the roof space, comprising 236sqm, functions as communal open space for the 21 no. apartments.

Four car parking spaces are accommodated at ground floor level within the building with dedicated shutters separating the car spaces from the public plaza. An additional accessible car parking space is also provided. Thirty four bicycle spaces are accommodated at ground floor level within the building.

7.4 Creche

A creche is accommodated at ground floor level within Block B in the Salesians Zone in the heart of the scheme. It is accessible from the hillside steps, which includes a ramp, or by a publicly-accessible lift next to the basement car park entrance. The creche with a floor area of 381sqm has capacity for 34 no. children.

The Guidelines for Planning Authorities on Childcare Facilities (2001) indicate that Development Plans should facilitate the provision of childcare facilities in appropriate locations and requires the provision of a minimum of one childcare facility with 20 places for each 75 dwellings. The Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2025 nuances the childcare requirement by stating that: 'Notwithstanding the Planning Guidelines for Childcare Facilities (2001), which are subject to review, and which recommend the provision of one child-care facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, the threshold for provision of any such facilities in apartment schemes should be established having regard to the scale and unit mix of the proposed development'. One-bedroom units and studio units are excluded for the purposes of calculating requirements.

In the case of the proposed development, when the 97 no. 1 bed units and 6 no. studio units are removed, the remaining 131 no. units generate a childcare requirement for 34 no. spaces. Accordingly, the proposed creche facility with capacity for 34 no. children is very much intended to accommodate local need. A generous 178sqm of dedicated outdoor amenity space is provided to serve the creche. Drop off facilities are provided in proximity to the creche along with 4 no. parking spaces. A total of 4 no. dedicated bicycle parking spaces are provided for employees with visitor bicycle spaces accommodated in the visitor bicycle spaces for the apartments.

7.5 Commercial Floorspace

Some 299sqm of commercial floorspace has been accommodated within the ground floor of the apartment block fronting onto O'Callaghan Strand, within the O'Callaghan Strand Zone. This space is largely flanked by the existing stone boundary wall surrounding the Cleeves Site, on its northern and eastern boundary. The commercial refuse area is enclosed within the building and is accessed off Stonetown Terrace.

The specific use of this unit has not yet been identified and so a range of uses is possible including Class 1, Class 2 and / or Class 10 uses, which includes use as a shop, professional services or services to visiting members of the public or the use as a museum /art gallery /library. The purpose of this space is to activate the Flaxmill Plaza and to support the area defined by the Riverside Canopy. The proposed public realm plan supports this use by providing for a dining / socialising area external the premises.

7.6 Mobility Hub

A Mobility Hub is proposed on the Shipyard Site, replacing the existing car park. Whilst a Mobility Hub was proposed on the Shipyard site from the outset in the Masterplan, it did comprise an integral part of the proposed commercial building at basement level. Thus, pending redevelopment proposals for the Shipyard site, it is proposed to locate the Mobility Hub at the western extremity of the site, separated from Fernhill by a flood berm and urban woodland planting.

The Mobility Hub will accommodate 36 no. cargo bike spaces; 84 no. double stacker bicycle spaces; and 6 no. EV Charging spaces. It is intended to serve the proposed development and the proposed Phase III educational campus development by TUS. The Hub shall be relocated as part of any future Phase IV development on the Shipyard Site. The Mobility Hub currently provides for 24 no. temporary car parking spaces pending redevelopment of the site.

7.7 Meanwhile Uses / Event Space

The temporary meanwhile uses currently operating on the application site are detailed in Section 5.2 of this chapter. Whilst most of these uses shall cease on site once construction commences, there are users such as the Limerick Treaty Suicide Prevention and Ennis Road Community First Responders, which could continue to use existing retained buildings on site for storage and meeting space purposes, subject to licensing arrangements.

In addition to these uses, it is envisaged that the Shipyard Site shall function as a temporary event space facilitating cultural / arts / music events, pending redevelopment of the application site. The Shipyard site is capable of accommodating pop up and community support uses and could include food markets and stalls should the demand exist. Similarly, the proposed area accommodating the Riverside Canopy has the potential to accommodate external exhibition space; events and social gatherings and to function as informal facility for ball games as the need arises.

7.8 Annual Use of PBSA

The proposed PBSA units will be used for student accommodation only during the academic year and student accommodation and/or tourist/visitor accommodation outside this time.

It is noted that the Department of Housing, Planning, Community and Local Government Circular PL 8/2016 on 'Identifying Planning Measures to Enhance Housing Supply' encourages the use of student accommodation developments for non-student related uses during the non-academic year. It is stated that:

> *"A flexible approach should be applied in respect of any planning conditions related to use/occupation of student accommodation. Such an approach would recognise the need to establish a steady rental income for such student accommodation throughout the year in order to ensure the deliverability of development projects from a funding point of view and recognise that student accommodation complexes can play an important role in providing affordable accommodation for tourists and visitors in major urban areas during peak summer demand periods. Therefore, planning authorities should aim to avoid making permissions for student accommodation complexes subject to restrictions on alternative summer or holiday uses, while at the same time ensuring that student accommodation is: not used for residential accommodation of a permanent nature; safeguarded for use by students and other persons related to the HEI during the academic year; and capable of being used for legitimate occupation by other persons/groups during holidays periods, when not required for student accommodation purposes".*

The potential for student related uses (e.g. visiting language schools, etc.) and non-student related uses during the non-academic year is an important component of student accommodation schemes to ensure their commercial viability. It is also important to ensure activity in the area and guard against anti-social behavior due to an absence of passive surveillance which would decrease outside of the academic year.

In this regard Section 2 of the Planning & Development Act 2000, as amended, defines student accommodation as: a) a building or part thereof used, or to be used, for the sole purpose of providing residential accommodation to students during academic term times, whether or not provided by a relevant provider (within the meaning of the Qualifications and Quality Assurance (Education and

Training) Act 2012), and that is not used, or to be used (*a*) as permanent residential accommodation, or (*b*) as a hotel, hostel, apart-hotel or similar type accommodation other than for the purposes of providing residential accommodation to tourists or visitors outside of academic term times.

Any non-student related use outside the academic year will be managed in the same manner as the student use. The measures set out in the Operational Management Plan prepared by M & C Property will apply to any non-student use outside the academic year.

7.9 Boundary Wall Works

Surrounding the Cleeves site and the Shipyard site, the stone boundary walls presents an opportunity and also a constraint in relation to the proposed development. With regard to the opportunity for the proposed development, the wall has the potential to provide legibility and inform future residents and visitors to the application site of the long history associated with the site. The constraints in relation to the wall relate primarily to the lack of permeability and as a barrier to movement and reducing the interaction with the existing neighbourhood. In addition, the wall also presents potential difficulties with regard to passive surveillance. Noting the above, the proposal includes for some interventions to the wall to provide permeability, which will entail some removal of and interventions to the historic wall, as follows:

- The existing wall at O'Callaghan Strand will be lowered to 450mm above ground level, with the exception of areas where there are entrance/building locations where the wall will be removed entirely.
- The retained existing stone walls on North Circular Road are to be stabilised following works to facilitate the raising of North Circular Road;
- The existing low wall and railings on North Circular Road are to be removed;
- Existing stone wall around Shipyard site adjoining North Circular Road is to be retained with partial demolition for access to proposed mobility hub and the provision of two new openings is to be provided in the wall between the Shipyard site and the riverside in a previously altered part of wall
- Locally widen the existing opening in the wall between the Shipyard Site and the riverside; and
- Remove and reinstate the existing wall at the western boundary on the Shipyard site neighbouring Fernhill.

7.10 Public Realm & Landscaping

The design intent is to create a high quality and appropriate landscape and public realm for future residents which will meet their recreational needs and provide an attractive visual setting and associated social amenity spaces. The public realm strategy seeks to provide three new public areas including creation of the Reservoir/Quarry Park; development of the Flaxmill Square; and the enhancement of the Riverside Corridor intended to transform the quayside in front of the Cleeves site. The riverside public realm will offer a vantage point overlooking the river and city quays with viewing terraces-curved seating and a riverside canopy offering a micro-climatic sheltered location. Significant areas of civic and green spaces are provided, incorporating formal and informal play space; nature based SuDs, permeability and access; provision of heritage interpretative panels; and a riverside canopy functioning as an outdoor event space. Some 0.78 hectares of the application site is dedicated to public realm space.

The main objective of the landscape strategy for the residential area is to place the new residential community within a cohesive landscape that responds to and integrates the proposed development within the overall Masterplan site. The landscape approach seeks to create a permeable network of green infrastructure and open spaces throughout the development and the masterplan site. Key characteristics influencing the landscape strategy and design of the application site are:

- Facilitating public access to the natural reservoir within the heart of the Cleeves site
- Maintaining and enhancing biodiversity throughout the site but in particular along the quarry walls
- Providing landscaped open areas with soft grass and planted zones.
- Facilitating high quality hard landscaped areas.
- Providing new pedestrian and cycle links facilitating connectivity between each development zone, the site and the surrounding road network, including the Condell Road.

Natural Play elements will be incorporated within the communal open spaces serving each development zone.. Natural Play incorporates designed elements that enable play spaces to blend in with their surroundings and encouraging interaction with the natural landscape.

There is currently an abundance of high-quality and visually attractive materials on the application site which can be reused and recycled in the proposed landscaping and public realm scheme. The landscape plan incorporates some of these materials as a method of preserving the cultural and industrial heritage of the site. The materials that have been chosen to recycle are durable and long-lived elements of the existing architecture which will improve the visual amenity of the space while.

7.11 Access & Layout

The proposed development has three existing vehicular access/egress points and a fourth acccess point which is currently blocked. Access points to the Salesians Zone, to the Flaxmill and Quarry Zones and to the Mobility Hub on the Shipyard Site Zone replace existing entrance locations, whila the fourth access point off O'Callaghan Strand is to be unblocked. There are two new access points proposed, including one providing access to the undercroft carparking at Salesians from the North Circular Road and the other at the end of Stonetown Terrace providing access to the Stonetown Terrace Zone. In addition, a proposed access provided from Stonetown Terrace to the Flaxmill Zone will enable occasional traffic associated with emergency vehicles.

The roads surrounding the proposed development, that is North Circular Road, O'Callaghan Strand and Stonetown Terrace will be traffic calmed and designed to have pedestrian and cyclist priority. North Circular Road and Stonetown Terrace, in particular will, operate as shared spaces. Further, it is proposed to regrade the North Circular Road to a flood protection level of 5.7m AOD as a key flood mitigation measure that would ensure emergency access during a 1-in-200-year flood event and protect the Quarry and Flax Mill sites from tidal flooding.

A total of 30 no. surface car parking spaces are provided within the Salesians Zone on the western boundary adjoining Salesians primary school. The car parking is provided for the dedicated use of the adjoining Salesians Primary School only and is being delivered on foot of an agreement with the Salesian Sisters, following disposal of land to the Council. These 30 no. spaces are not included in Table 2.2 below as they are not intended to serve the proposed development.

The proposed car and bicycle parking provision serving the development aligns with the parking requirements set out in the Limerick Development Plan 2022 – 2028 and the Sustainable Urban Housing Design Standards for New Apartments 2025, as detailed in Table 2.2. In accordance with the minimum requirement of 1 no. EV Charge Point space per five car parking spaces, a total of 17 no. EV spaces are provided within the parking distributed around the residential units. An additional 6 no. charging points are provided in the Mobility Hub. Ducting shall be provided for every parking space. The bicycle parking numbers includes both residential and visitor parking provision.

Table 2.2 Car Parking Provision			
	Maximum Provision	Required	Provided
Salesians	0.5 spaces per < 3 bed unit 0.75 space per 3+ bed unit 1 space per 80sqm for creche	88	49
Quarry (PBSA)		0	8
Stonetown Terrace		25	14
O'Callaghan Strand		11	5
Shipyard		0	10* 26**
Creche		4	4
Total		**128**	**116**

* Residential Car Club Spaces

** Visitor Parking Spaces Serving Proposed Development and Future Phase III of Masteplan

The proposed cycle parking provision serving the development takes into account the parking requirements set out in the Limerick Development Plan 2022 – 2028 and the Sustainable Urban Housing Design Standards for New Apartments 2025.

The Design Standards for New Apartments indicates that one bicycle parking space is required per residential bedroom and one visitor space per two residential units. There are 395 beds provided across 232 residential units and therefore, 395 residential cycle parking spaces and 116 visitor cycle parking spaces are required in accordance with the Design Standards.

The Limerick Development Plan 2022 – 2028 indicates that for student accommodation in Zone 1, one cycle parking space is required per five beds. There are 270 beds provided in the Quarry PBSA and therefore 54 cycle parking spaces are required. The total cycle parking provision for the residential developments is well in excess of the minimum required, with 466 spaces provided for residents (including 66 spaces for the Quarry PBSA). These spaces are being provided in safe, covered areas within the various residential developments.

In addition to this, there are 110 visitor spaces located within different zones throughout the proposed development. An additional 36 no. cargo cycle parking spaces and 84 no. double stacker cycle parking spaces are provided in the mobility hub (Shipyard Zone). This is deemed to be a reasonable quantum considering the cycle sharing schemes that will be available for use. There are also 3 cycle parking spaces being provided for creche use.

7.12 Telecommunication Antennae

Block 2A (west wing) of the PBSA proposes 9 no. Support poles to support 2 no. antennae each; 6 no. microwave dishes affixed to the plant screen; and associated telecommunications equipment and cabinets (effectively screened). A comprehensive report has been prepared by ISM Independent Site

Management and which accompanies the application for consent under separate cover. The report details why the infrastructure is necessary to mitigate the impact the development will have on the existing poor mobile phone signal in the area and provide both the occupants of the development and the local area with adequate voice and data services to meet modern demands.

The proposed development involves the micrositing of telecommunication antenna by approximately 3 meters on the rooftop of Block 2a of the PBSA. The adjustment is intended to optimise signal coverage and network performance without altering the overall design or height of the installation. The flexibility is required to facilitate technologically acceptable locations at the time of delivery of the the infrastructure.

7.13 Drainage Strategy

The drainage strategy to be delivered as part of the proposed development is intended to service the Masterplan lands and the extent of development envisaged within the Masterplan, including the proposed TUS Educational Campus. Designed by ARUP Consulting Engineers, the development zones will be treated separately, such that each site will have an independent set of surface water, foul and watermain networks (where possible) to enable phasing of the works.

All existing utility services within the Cleeves development site are to be decommissioned and removed with the exception of the combined sewer located at the north-western corner of the Salesians site. This sewer currently transverses the site boundary and connects to the neighbouring Salesian Primary School property. It is proposed to divert this combined sewer, rerouting it off-site in accordance with the drainage strategy.

The design approach for foul water services from each zone will have individual connections to the adjacent Uisce Eireann foul sewers on North Circular Road and on Stonetown Terrace. The estimated daily wastewater hydraulic loading from the proposed development and the Phase III TUS development would be 263.3 m3/d. The anticipated average foul discharge for the Cleeves development is 3.05 l/s with a peak discharge of 16.47 l/s. Confirmation of Feasibility has been received from Uisce Eireann.

Surface water will be managed in accordance with the CIRIA SuDS Manual and discharges from the application site will be restricted to 2 litres/second/hectare, prior to discharge to the Shannon River, in accordance with the Greater Dublin Strategic Drainage Study (GDSDS) and the Limerick Development Plan 2022-2028.

The overall strategy is to promote the use of Sustainable Urban Drainage Systems (SuDS) to minimise final discharge rate and mitigate flood risk on each site. The primary objective is to use the reservoir as an attenuation facility, managing surface water runoff from the adjacent Salesians, Quarry and Stonetown Terrace sites. Controlled discharge from the reservoir will be facilitated via a 225 mm diameter outlet pipe, which will traverse through the Flaxmill Plaza site and connect to the final manhole before discharging to the River Shannon. There is no work proposed to the existing outfall. The existing deep manhole at the southern end of the site is in very poor condition. It is proposed to construct a new offline manhole adjacent to the existing structure (to keep the existing system operational during construction). The new manhole will be fitted with a TideFlex non-return valve to prevent backflow and protect the site from flooding from the outfall pipe. A combination of SuDS and petrol interceptors will be used to treat the surface water runoff on site before it is discharged to the Shannon River.

The remaining development areas—including Flaxmill Plaza, O'Callaghan Strand, Shipyard, and the adjacent roads (NCR, OCS, and Stonetown Road)—will drain independently to the existing discharge pipe network.

Surface water calculations prove that there is sufficient capacity in the reservoir to attenuate excess runoff for a 1:100 year storm (plus 30% climate change and 10% urban creep) from adjacent sites. A reservoir clean-up strategy be implemented during the construction phase. This will include:

- Controlled draining of the reservoir
- Removal of accumulated sediment
- Survey and inspection of the reservoir bed.

The proposed SuDS scheme for the proposed development is estimated to achieve a 14% decrease in the hypothetical greenfield runoff rate for Zone 1 and a slight increase relative to the greenfield runoff rate for Zone 2. This results in the post development runoff rate being reduced to almost greenfield rates, with significant benefits to the receiving environment.

The design approach for the provision of potable water to each site comprises individual ring mains for each site, with separate metered connections to the existing Uisce Eireann (UE) mains adjacent to each site. The anticipated average water demand is 3.447 litres / second with a peak demand of 18.506 l/s for the proposed development and Phase III TUS Educational Campus.

Salesians Zone

All existing services on the Salesians site will be removed except for a combined sewer, which will be diverted off-site; the site's surface water will be managed through three independent catchments discharging to the reservoir using SuDS measures including green roofs (15% coverage), rain gardens porous paving, and a piped gravity system. Foul flows will connect to the existing combined sewer and water will be supplied via the North Circular Road main.

Quarry Zone

The Quarry site adopts a drainage strategy similar to the Salesians site, with surface water attenuated in the reservoir via SuDS measures including green roofs covering 25% of roof area and adjacent raingardens. Foul water connects to the public sewer on North Circular Road 125m downstream, and water supply is via a Uisce Eireann approved connection 250m downstream on North Circular Road.

Stonetown Terrace Zone

Green roofs covering 25% of roof area, porous paving, and raingardens, collectively attenuate the site's runoff volume. Residual surface water is conveyed via a gravity-fed piped system to the reservoir, with supplementary storage provided by surrounding landscaped areas. A water feature, integrated into the elevation drop between Stonetown Terrace and the Quarry site, facilitates flow to a hydraulically compact bioretention zone, from which water is captured in an underground network before final discharge to the reservoir. Foul drainage is managed through a gravity system discharging to the existing combined sewer on Stonetown Terrace, and potable water is supplied via a connection to the nearest public watermain, both as approved by Uisce Éireann.

Flaxmill Zone including O'Callagan Strand Zone

The Flaxmill Plaza site comprises two distinct surface water catchments. The major catchment draining southeast, incorporates SuDS features including tree pits and rain gardens.. Residual flows are directed to an attenuation tank located at the southeast corner, with controlled discharge to the Shannon River via an existing outfall. The minor catchment drains northwest to the reservoir through a separate gravity-fed network for attenuation. Foul water is conveyed via gravity systems to the existing combined sewer along North Circular Road, and potable water is supplied through a ring main connected to the Uisce Éireann network.

Shipyard Zone

The Shipyard site is a unique case, as the surface water is fully attenuated by SuDS measures. Swales are lined on the peripheries of the site and porous paving in the parking areas attenuate the remaining runoff . Water and foul connections have been provided to future proof the site for future development as per the overall Masterplan.

7.14 Construction & Delivery

A Construction & Environmental Management Plan (CEMP) has been prepared by AtkinsRealis and accompanies the application for consent. It details the proposed construction methods and approach to delivery of the proposed development.

7.14.1 Site Sequencing

It is anticipated that planning approval for the proposed development will be secured in early 2026 and that construction will commence on site in Q1 2027, subject to the discharge of any pre-commencement planning conditions. The proposed development has a projected completion timeframe of four years dependent on market conditions and funding streams. This estimation is based on the typical construction programmes for other similar developments. In the event that the phases were not developed (due to unforeseen circumstances) the construction period may extend, having regard to the nature of the project and the need for flexibility, contractor pricing etc.

The development is structured into nine distinct but overlapping stages. Depending on market conditions and delivery mechanisms, some stages may progress more quickly or slightly ahead of others. For instance, Stage 8 is a priority for early delivery, as it will significantly enhance the site's appearance and help establish Cleeves as an attractive place to live, work, and enjoy leisure activities. Therefore, Stage 8 may begin earlier than planned, depending on the progress of Stages 6 and 7.

Maintaining flexibility in the delivery sequence is essential to ensure the development can adapt to changing market conditions. The anticipated sequence of stages is outlined below and detailed further in Table 2.3:

Stage 1: Construction of Bat Houses - A 3-month period is allocated exclusively to this stage to allow bats on-site to adjust to their new accommodation. No other construction activity will overlap with this stage.

Stage 2: Site Demolition and Enabling Works - This stage involves demolishing identified buildings and structures to facilitate development and installing enabling drainage infrastructure across the Flaxmill area. Temporary surface treatments will be applied to support access to the upper-level sites (Salesians and Stonetown). This stage is expected to take 12–15 months.

Stage 3: Flood Protection Works - Raising the North Circular Road and implementing other flood protection measures will occur concurrently with Stage 2 and is expected to take 15 months.

Stage 4: Salesians Zone Development - Construction of apartments and triplexe units, along with local public realm and communal open spaces, will begin midway through Stage 2. This stage is expected to take 18–24 months.

Stage 5: Stonetown Terrace Zone Development - This stage will likely begin alongside Stage 4 and take 15–18 months. Given its timeline, Stonetown Terrace is expected to be the first zone ready for occupation.

Stage 6: O'Callaghan Strand Zone Development - Construction of apartments in this zone will begin midway through the Stonetown Terrace works and is expected to take 15 months, likely completing before the Salesians Zone.

Stage 7: Quarry Zone PBSA and Public Realm - This stage includes the construction of Purpose-Built Student Accommodation (PBSA) and associated amenities, as well as public realm improvements around the reservoir. It is expected to take 24 months.

Stage 8: Flaxmill Plaza and Riverside Public Realm - Delivery of Flaxmill Plaza and riverside canopy works is anticipated to take 15 months. This stage will begin after the completion of Stonetown Terrace but before the Salesians Zone is finished. Completion is expected to align with the PBSA.

Stage 9: Shipyard Mobility Hub - The final stage involves constructing the Mobility Hub on the Shipyard site, along with associated site works. This will commence once all other stages are complete and is expected to take 6 months.

		2027				2028				2029				2030			
Stage	Work Activity	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
1	Construction of Bat Houses																
2	Demolition/enabling works																
3	Flood Defence works																
4	Construction of Salesians																
5	Construction of Stone Terrace																
6	O'Callaghan Strand																
7	Construction of PBSA																
8	Delivery of Flaxmill Plaza																
9	Mobility Hub on the Shipyard																

Table 7.2 Site Sequencing

7.14.2 Masterplan Delivery

Taking a holistic view of the entire masterplan site, it is anticipated that the masterplan site could take ten years to be delivered. However, this is dependent on securing relevant planning approval in a timely manner for each phase.

- Phase I Heritage Works – Commence Q1 2026 with Phase 01 stabilisation and repair works to the Flaxmill. Three other sub phases of works have been identified which shall progress once Phase 01 works are complete. It is likely that Phase I works will be ongoing and will overlap with Phase II works comprising the proposed development.
- Phase II Residential & Public Realm Works (the proposed development) – As stated above delivery of Phase II is likely to take four years to complete.
- Phase III TUS Educational Masterplan – Consent shall be sought for this development in 2026, dependent on funding approval from the Higher Education Authority. The delivery timescale for this phase of the Masterplan is difficult to establish at this time, as significant repair works are

required to the Flaxmill building to facilitate its adaptive reuse and which will absorb significant time. It is likely that this phase of works will overlap with both Phase I & Phase II works.

- Phase IV Shipyard Site - There is no timescale defined for the delivery of this element of the development, but it is likely that detailed design will commence after the consent process associated with the TUS educational campus.

8.0 ENVIRONMENTAL CONSIDERATIONS

8.1 Environmental Impact Assessment Report (EIAR)

The projects which require EIA are listed in Annex I and Annex II of the codified Directive 2011/92/EU as amended by Directive 2014/52/EU (hereafter referred to as the 'EIA Directive'). Schedule 5 (Part 1) of the Planning & Development Regulations 2001(as amended) transposes Annex I of the EIA Directive directly into Irish legislation and establishes thresholds for development for which an EIA is always required.

Article 4(2) of the EIA Directive provides that, for projects listed in Annex II, Member States shall determine whether the project shall be subject to an EIA and that this determination shall be made either through a case-by-case examination or thresholds or criteria set by the Member State. In transposing Annex II of the EIA Directive into Irish legislation, Schedule 5 (Part 2) of the Planning and Development Regulations 2001 (as amended) sets mandatory thresholds for each project class.

For a project of this nature and scale, Paragraph 10 Infrastructure Projects and Paragraph 14 Works of Demolition are the relevant paragraphs in Part 2, Schedule 5 of the Regulations, as detailed in Table 1.2 below.

Table 8.1 EIA Threshold Screening	
Paragraph 10 Infrastructure Projects Class (b)(i)	
Threshold	Construction of more than 500 dwelling units
Response	The proposed development comprises 302 no. dwelling units[4] and is below the 500 dwelling unit threshold. The development does not exceed the threshold requirement for this class of works.
Paragraph 10 Infrastructure Projects Class (b)(iv)	
Threshold	Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere. (In this paragraph, "business district" means a district within a city or town in which the predominant land use is retail or commercial use).
Response	The application site is 5.09 hectares in area. Whilst the existing predominant landuse surrounding the application site is residential in nature and zoned accordingly, the site itself is of industrial / commercial nature. Of importance, the majority of the site is located within the defined City Centre Area zoning. Further the application site is identified as a City Centre Commercial Area (CCCA) where the objective is to support the retention and expansion of a wide range of commercial, cultural, leisure and residential uses in the commercial core area, (apart from comparison retail uses). Having regard to the primary zoning of the land as a 'city centre commercial area' and the objective to provide for a mix of commercial, residential, leisure and cultural uses, which is distinct from the immediate adjoining residential zonings, it is considered that the application site falls within a 'business district'. Therefore, the proposed development is considered to exceed the applicable threshold and require an EIAR
Paragraph 14 Works of Demolition	
Threshold	Works of demolition carried out in order to facilitate a project listed in Part 1 or Part 2 of this Schedule where such works would be likely to have significant effects on the environment, having regard to the criteria set out in Schedule 7.
Response	The proposed development comprises extensive demolition in proximity to the River Shannon and other sensitive environmental receptors including consideration of protected species – Lesser Horseshoe Bat. The works of demolition have the potential to have significant effects on the environment and requires mandatory EIA.

The EIAR includes information as specified in Article 5(1) and Annex IV of the EIA Directives. It provides information on the location and scale of the proposed development and details on design and impacts on the environment (both positive and negative) as a result of the proposed development. The environmental variables (comprising a dedicated chapter within the EIAR) considered include:

- Population & Human Health
- Biodiversity
- Cultural Heritage – Archaeology
- Cultural Heritage – Architectural Heritage
- Land & Soils
- Water & Hydrogeology
- The Landscape
- Noise & Vibration
- Air Quality
- Climate
- Microclimate – Pedestrian Wind Comfort & Distress

- Microclimate – Sunlight Daylight & Shadow Analysis
- Material Assets - Traffic & Transport
- Material Assets – Waste Management
- Material Assets – Utilities
- Risk Management for Major Accidents / Disasters

Each environmental variable has been examined in terms of the existing or baseline environment, identification of potential construction and operational stage impacts and where necessary proposed mitigation measures are identified. The interaction of the environmental aspects with each other is also examined. Each chapter includes an assessment of potential cumulative impacts with other existing and planned developments, where relevant.

A number of environmental reports were prepared to inform the EIAR and to further guide the proposed development. These reports also accompany the proposed development and include:

- Invasive Species Management Plan;
- Appropriate Assessment Screening Report and Natura Impact Statement;
- Circular Economy Statement (CES);
- Construction and Demolition Resource and Waste Management Plan (CDRWMP);
- Operational Waste Management Plan (OWMP)
- Construction Environmental Management Plan (CEMP);
- Statement of Significance of Architectural Heritage;
- Flood Risk Assessment (FRA);
- Water Framework Directive Assessment (WFDA);
- Energy Strategy;
- Traffic & Transport Assessment & Mobility Management Plan;
- Arboricultural Impact Assessment;
- Quality Audit (incl Road Safety Audit and DMURS Compliance Statement);
- Telecommunications Impact Assessment Report;
- Glint & Glare Assessment;
- Wind and Microclimate Study; and
- Daylight and Sunlight Assessment Report

The EIAR has been prepared cognisant of the findings of the above environmental reports. An iterative approach to design has been adopted, addressing and incorporating many environmental considerations and incorporating mitigation measures where necessary, as detailed in Chapter 23.0 of the EIAR. The EIAR has demonstrated that the proposed development will not give rise to adverse, significant, long-term, permanent environmental effects.

8.2 Appropriate Assessment Screening Report and Natura Impact Statement (NIS)

The eastern boundary of the application site, where it adjoins the River Shannon, extends beyond the Shannon SAC boundary by 0.6m. This area comprises the terrestrial edge of the Shannon SAC comprising areas of hardscape and public realm. For the avoidance of doubt, no works are proposed within the river or the mudflats. The site also lies within 20m of the River Shannon and River Fergus Estuaries SPA.

The potential for impact on European sites has been fully assessed in the Appropriate Assessment Screening Report and Natura Impact Statement (NIS) that has been prepared in support of the current application. The NIS 'Screens In' the potential for the proposed development to result in Likely Significant Effects on both the Lower River Shannon SAC or the River Shannon and River Fergus Estuaries SPA both alone and in combination with other plans and projects as a result of deterioration in water quality and disturbance to relevant species during construction and operation.

Mitigation is prescribed in the NIS such that all potential for any adverse effect on the integrity of any European Site is avoided. The measures ensure that the proposed development will not prevent the QIs of the Lower River Shannon SAC or the SCIs of the River Shannon and River Fergus Estuaries SPA from achieving/maintaining favourable conservation status in the future as defined in Article 1 of the EU Habitats Directive.

The NIS objectively concludes that the proposed development, individually or in-combination with other plans or projects, will not adversely affect the integrity of the Lower River Shannon SAC or the River Shannon and River Fergus Estuaries SPA. or any other European Site.

8.3 Sunlight, Daylight & Shadow Analysis

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. This careful balance ensures that future residents will benefit from a high standard of living, with ample natural light enhancing the overall quality of life, without impacting 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. The impact studies have presented some impact on the surrounding residential properties, as expected when introducing a high density development in an urban scenario. IES confirms that the outcome aligns with standard expectations for urban regeneration projects where existing low-density or undeveloped sites are transformed to meet contemporary housing demands.

8.3.1 Assessment Outcomes – Existing Neighbouring Development

Sunlight to Existing Amenity Space

On March 21st, the existing amenity spaces will receive similar levels of sunlight with the proposed development in place when compared to the existing situation. In all cases the results comply with the recommendations in the BRE Guide outlined above and therefore there will be a negligible impact to the neighbour's sunlight.

Sunlight to Existing Buildings (APSH)

The assessment considers existing dwellings sunlight and tests if the Annual Probable Sunlight Hours (APSH) results for the living room windows (existing properties) are greater than 25% annual and 5% winter sunlight or are greater than 0.8 times their former value with the proposed development in place or the reduction in sunlight across the year is less than 4% with the proposed development in place.

When compared to the existing undeveloped site, 100% of the tested points (22no.) meet the BRE recommended values. These results highlight that the proposed development will have minimal impact to the sunlight received to these existing neighbouring properties. Overall the impact to the existing adjacent properties sunlight will be negligible. .

Daylight to Existing Buildings (VSC)

The assessment considers the proposed development and tests if the Vertical Sky Component (VSC) results are greater than 27% or not less than 0.8 times the value of the existing undeveloped nature of the application site. When compared to the existing undeveloped nature of the application site, of the 226 no. points tested, 94% (212 points) have a Proposed VSC value greater than 27% or not less than 0.8 times their former value compared to the Existing Scheme, thus complying with the BRE Guidelines.

Seven windows below recommendation are located on the Salesians Primary School. Three of these windows are above 26% and only marginally outside the recommended value of 27%. The remaining 4 are windows to the same hall space within the School is also lit from an array of windows on the other side of the hall

Five windows below recommendation are located on the Lansdowne Hall apartments. Two of the windows are to bedrooms and are above 25% and marginally outside recommendations and therefore there will be a minor adverse impact to these windows. The remaining three windows below recommendations have values between 18% and 21% and are located on living spaces with large floor to ceiling glass onto an outdoor balcony area.

The remaining two windows below recommendations are located on properties on Stone Town Terrace. Both windows have percentages of 18% and 25% and are marginally outside the recommended of 80% of the existing value. In addition to this both windows are larger than a conventional window and have floor to ceiling glass in place. As noted in the BRE guide (as per Section 2.1.6), adequate daylight should still be expected given the presence of larger than conventional windows.

Overall, the daylight and sunlight assessments have shown that 94% of the existing properties comply with the BRE Guide (3rd Edition) and those properties that have results below the recommendations (14 of 226) are only marginally outside the recommendations with larger windows in place and therefore there will continue to be a negligible impact as a result of the proposed development.

Conclusion

From the outset of the detailed design stage, IES collaborated closely with the design team to optimise daylight and sunlight performance. Inbuilt design mitigation has been incorporated into the development as detailed in Chapter 5.0 Section 5.6.3. The finished floor level of the buildings at Stonetown Terrace was reduced by 1.5m to +9.5m and the apartment building was relocated 2.5m further to the west to ensure adequate daylight and sunlight to the existing apartments in Landsdowne Hall and the houses in Clanmaurice Gardens / Terrace.

Notwithstanding these efforts, the high density requirements for the site have resulted in some areas of under performance, reflecting the complex trade-offs inherent in high-density urban development, where optimal daylight access must be weighed against other planning objectives including housing provision and urban regeneration and city centre living. Within the context of this urban site, it is the expert opinion of IES that the daylight and sunlight effects detailed in Chapter 17.0 and in the IES

reportreflect the inherent characteristics of a city-centre location. Ultimately, these performance outcomes represent an acceptable balance between maximizing housing delivery and maintaining reasonable daylight and sunlight access.

The SRSCGs specifically set out that "*In drawing conclusions in relation to daylight performance, planning authorities must weigh up the overall quality of the design and layout of the scheme and the measures proposed to maximise daylight provision, against the location of the site and the general presumption in favour of increased scales of urban residential development. Poor performance may arise due to design constraints associated with the site or location and there is a need to balance that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.t[9]"*.

In the present case, it is acknowledged that certain windows at Landsdowne Hall fall below minimum standard for daylight and sunlight access. However, the development has incorporated reasonable mitigation measures, including strategic massing, stepped building profiles, a lowering of finished floor levels, increased unit sizing and window opes, and orientation optimisations, to minimise impacts where possible. The SRSCGs clearly allows for some deviation from strict daylight targets 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 (June 2022), where the benefits of increased density and strategic regeneration outweigh the impacts. In this case, the site's city centre and existing residential zoning and its potential to significantly contribute to Limerick city centre as a new, vibrant Quarter, all support a more intensive form of development that responds directly to national housing and regeneration needs. Further, it is noted that Section 11.4.2.1 of the Limerick Development Plan 2022 – 2028 stated that, "*each development proposal will be assessed on a case-by-case basis and should not be seen as a precedent for future development in the area".*

8.3.2 Assessment Outcomes – Proposed Development

The proposed habitable rooms within the proposed development also required assessment as per Section 11.4.2.3 of the Development Plan, which requires that "*as a standard, all habitable rooms within new residential units shall have access to appropriate levels of natural/daylight and be guided by the principles of Site Layout Planning for Daylight and Sunlight, A guide to good practice (Building Research Establishment Report, 2011) and/or any updated guidance*". The IES report accompanying the application for approval confirms the following:

Sunlight

Of the 492 no. points tested 96% (475 no.) meet the BRE Guide 3rd Edition / IS/BS EN 17037:2018 sunlight exposure recommendations of greater than 1.5 hours on March 21st. Where windows do not meet this recommendation, this is predominantly as a result of their orientation, or as a consequence of the impact of balcony projections.

It should be noted that in the development of any apartment type building in particular, achieving in the region of 75% to 80% for this assessment would be considered very high and factors such as site constraints and ultimately orientation play a huge part to the outcome of this assessment. The report concludes that the sunlight provision results to the proposed development in accordance with IS/BS EN

[9] *Sustainable Residential Development and Compact Settlement Guidelines, 2024 pp.61*

17037:23018 are considered very good due to the fact that not all living rooms can face south and the inclusion of balconies.

Daylight

The BS EN 17037-2018+A1-2021 National Annex provides target illuminance values for bedrooms, living rooms and kitchens within residential developments. Across the proposed development, 95% of the tested rooms within the proposed development are achieving the daylight provision targets in accordance with Table NA.1 of BS EN 17037-2018+A1-2021.

When considering the Residential units and the Student Accommodation in isolation, there is a compliance rate of 93% for the Residential units and 98% for the Student Accommodation.

Section 3.2 of the Urban Development and Building Heights: Guidelines for Planning Authorities December 2018, states the following: -
"Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution."

Having regard to the statements above, it should be noted that throughout the design process the design team worked hard to optimise the whole development to maximise the daylight within the proposed scheme. The following design optimisation solutions were tested in an attempt to improve daylight to the proposed apartments which included the following: -

- Alterations to layouts.
- Increase Opening Sizes

Design features have been incorporated into the development where rooms do not achieve the daylight provision targets in accordance with the standards they were assessed against. These design features again help to balance off and compensate the lower levels of daylight measured in the applicable spaces and are summarised as follows: -

- Percentage of apartments, triplexes or townhouses that are dual aspect (or greater) is 54.7% (128 out of 234)
- The amount of Communal Amenity Space provided for the residential plots is 1,689sqm this is 8.5% more than the recommended minimum of 1,556sqm for the residential plots.
- There is approximately Public Open Space of 7,817sqm to be provided in the proposals. This is over 15% of the site area.
- 78.2% of the residential homes are in excess of minimum size standards and are oversized. (183 out of 234)
- Floor to ceiling height in excess of 2.5m.

Further to this, design features specific to each dwelling have been incorporated into the development where rooms do not achieve the daylight provision targets in accordance with the standards they were assessed against. These design features, which include larger room sizes, help to balance off and compensate the lower levels of daylight measured in the applicable spaces. The Compensatory Measures, with respect to room size, its orientation with respect to open space; and increased floor to

ceiling height, for each individual unit are detailed in Appendix A of the Sunlight, Daylight & Shadow Analysis Report accompanying the application.

Conclusion

From a planning policy perspective, it is important to highlight that this application site has been consistently identified at national, regional, and local levels as suitable for significant redevelopment with increased building height and density promoted notwithstanding the established low density housing in the area. The Regional Spatial and Economic Strategy for the Southern Region (RSES) identifies Cleeves site as a strategic brownfield regeneration opportunity, central to achieving compact urban growth and sustainable development objectives (see Section 10.2 of this report). This policy support emphasises the critical role this application site is expected to play in meeting long-term housing and regeneration targets.

The proposed development aligns with the strategic planning goals for Limerick and represents a timely and policy-supported opportunity to deliver much-needed housing and urban renewal in a key city centre location. The proposal demonstrates a strong commitment to high-quality design and sustainable urban living, while also addressing pressing housing delivery targets. In this context, and as acknowledged by the SRCSGs, it is appropriate to take a balanced approach that supports compact urban growth while recognising the challenges inherent in city centre regeneration sites.

9.0 NATIONAL POLICY

9.1 Revised National Planning Framework

The Revised National Planning Framework (NPF) approved in April 2025 sets out a strategic development strategy for the country up to 2040. Amongst its key messages is the need to provide the highest possible quality of life for people and communities via well designed and managed built and natural environments. Limerick City is designated as a Tier 2 city, with plans to increase its population by 50% by 2040, targeting an increase of at least 44,000 people from 2022 to 2040 to at least 150,000 in total. At least 50% of all new homes in Limerick should be delivered within the existing built-up footprint, avoiding urban sprawl. This growth is to be achieved through compact urban development, emphasising the regeneration of brownfield sites and infill development to create sustainable, high-quality urban environments.

The NPF has been updated to address evolving challenges and needs, including population growth, housing demands, infrastructure requirements, and climate change for example. The Framework focuses on:

- Growing our regions, their cities, towns and villages and rural fabric.
- Building stronger regions – accessible centres of scale.
- Better outcomes for communities and the environment, through more effective and coordinated compact, smart and sustainable growth.

Overall, the Framework caters for:

- The extra one million people that will be living in Ireland by 2040.
- The need for approximately 50,000 additional households per annum to 2040.
- The demand for additional school places, special education provision, and third-level education places.

The application sites zoning allows for residential development and is considered appropriately serviced with appropriate infrastructure to deliver on a sustainable form of development. The population of Limerick City and Suburbs is expected to grow to more than 150,000 people by 2040. It is submitted the current proposal for the equivalent of 302 no. residential units will deliver on the above objectives of the NPF.

The NPF provides for a number of National Policy Objectives (NPO) which must be adhered to in the advancement of development throughout the State and in the delivery of people, homes and communities. It contains a number of NPO's which clearly support the development of a city centre site such as Cleeves, including:

National Policy Objective 3 – Southern Region: approximately 330,000 additional people over 2022 levels (c. 450,000 additional people over 2016-2040) i.e. a population of just over 2 million.

National Policy Objective 4 – A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs.

National Policy Objective 7 - Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements and ensure compact and sequential patterns of growth.

National Policy Objective 8 – Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints and ensure compact and sequential patterns of growth.

National Policy Objective 10 - Deliver Trasport Orientated Development (TOD) at scale at suitable locations, served by high capacity public transport and located within or adjacent to the built up footprint of the five cities or a metropolitan town and ensure compact and sequential patterns of growth.

National Policy Objective 12 - Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diver and integrated communities that enjoy a high quality of live and well-being.

National Policy Objective 13 - Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.**National Policy Objective 14** – Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets that can accommodate changing roles and functions, increased residential population and employment activity, enhanced levels of amenity and design and placemaking quality, in order to sustainably influence and support their surrounding area to ensure progress toward national achievement of the UN Sustainable Development Goals.

National Policy Objective 16 – To ensure that the targeted pattern of population growth of Ireland's cities to 2040 is in accordance with the targets set out in Table 4.1.

National Policy Objective 20 – In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning

National Policy Objective 22 – In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth.

National Policy Objective 42 – To target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2040.

National Policy Objective 43 – Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

National Policy Objective 44 – Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time.

National Policy Objective 45 – Increase residential density in settlements, through a range of measures including reductions in vacancy, re use of existing buildings, infill development schemes, area or site-based regeneration, increased building height and more compact forms of development.

National Policy Objective 67 - Support the circular and bio economy including in particular through greater efficiency in land and materials management, promoting the sustainable re-use and refurbishment of existing buildings and structures, while conserving cultural and natural heritage, the greater use of renewable resources and by reducing the rate of land use change from urban sprawl and new development.

National Policy Objective 89 - Protect, conserve and enhance the rich qualities of natural, cultural and built heritage of Ireland in a manner appropriate to their cultural and environmental significance.
National Policy Objective 90 - Enhance, integrate and protect the special physical, environmental, economic and cultural value of built heritage assets, including streetscapes, vernacular dwellings and other historic buildings and monuments, through appropriate and sensitive investment and conservation

Evaluation of Consistency

At a metropolitan scale, there is a clear focus at national level on regeneration and redevelopment projects within the existing built up footprint, and the creation of a more compact urban form, facilitated through well-designed medium and higher density development. Delivery on the above objectives also require significant development, on sites that can be integrated into the existing built-up area of the city and that are serviced by existing or planned public transport. The NPF identifies key future growth enablers for Limerick including "*Implementation of the updated Limerick 2030 economic strategy to create modern, city centre residential, food and beverage, leisure and office accommodation, to reposition the City Centre as the premier regional shopping destination and to deliver a series of transformational city centre commercial and public realm projects".*

The NPF also acknowledges the demand for student accommodation. It recognises that student accommodation demand exacerbates the demand pressures on the available supply of rental accommodation in urban areas in particular. It acknowledges that in the years ahead, student accommodation pressures are anticipated to increase.

The proposed development accords with the Revised NPF in particular with its principles of compact growth and the delivery of a mixed use development on a vacant brownfield site, in need of regeneration, in the city centre. Where housing policy is concerned, the proposed development accords with the NPF's core principles for housing delivery – in particular that the location of new housing be prioritised in the city centre. Comprising Phase II of an overall Masterplan proposal, the delivery of residential units has been prioritised on the application site.

Key national policy objectives, including managing the circular economy , the sustainable reuse of materials and resources and the conservation of cultural and natural heritage have all informed the approach to development on the site, as detailed in the Circular Economy Statement prepared by ARUP and accompanying the proposed development.

In accordance with the NPF's strategy of compact growth, it is proposed to facilitate comprehensive regeneration of a city centre site, with a high quality mixed use development focused on delivering quality spaces and homes in Phase II of an overall Masterplan for the site.

9.2 Housing for All: A New Housing Plan for Ireland

The Housing for All (HFA) plan was introduced by the Government in order to achieve a more sustainable housing system with a planning system that is fit for purpose and that will create long term vibrant communities with the necessary supporting infrastructure. It caters for:

- Preventing homelessness
- Protecting tenants
- Supporting social inclusion

The plan focuses on:

- Introducing incentives and measures to bring vacant and derelict properties back into residential use.
- Supporting homeownership and increasing affordability.
- Preventing homelessness, protecting tenants and supporting social inclusion and increasing social housing delivery.
- Increase the levels of new housing stock with the goal of ending homelessness by 2030.
- Achieve a more sustainable housing system with a planning system that is fit for purpose and that will create long-term vibrant communities with the necessary supporting infrastructure.
- Increasing the capacity and efficiency of delivery in both public and private sectors.
- Over 300,000 new homes to be built by 2030, including a projected 54,000 affordable homes for purchase or rent and over 90,000 social homes.
- Setting out a pathway to economic, societal and environmental sustainability in the delivery of housing.

The HFA is to be the largest State led building programme in our history and is financed by the biggest State funding commitment ever. It is apparent from the HFA plan that high-density housing is to be supported. Housing policy objective 11, no. 11.2 seeks to *"Develop section 28 Guidelines for Planning Authorities on Sustainable and Compact Settlement Guidance (SCSG), including guidance on housing typologies to facilitate innovative approaches to medium and higher densities.* Additionally, housing policy objective 12, no 12.2 is to deliver a new approach to active land management: *"Develop proposals for new Urban Development Zones,* to DHLGH *deliver a coordinated and transparent approach to the delivery of residential and urban development, particularly on brownfield sites, meeting the compact growth objectives of the National Planning Framework."*

Furthermore, the HFA plan will drive economic sustainability and reduce constructions costs. Objective 23, 23.11 states that the HFA plan will *"Reduce* C&D waste and *associated costs by working with the construction industry on demonstration projects to* show how *best practice (specifically* in *relation to urban high-rise apartment developments)* waste *segregation and other* waste *management measures, can reduce overall C&D disposal costs."*

Evaluation of Consistency

The urgent delivery of houses is reflected in the prioritization and advancement of Phase II ahead of other phases of development in the Masterplan. The subject proposal provides for 302 no. new

residential units, inclusive of 270 no. student bedspaces on a serviced, urban brownfield site within the defined city centre of Limerick. It will contribute towards the government's target deliverance of housing, achieving compact growth and a high quality, sustainable development.

9.3 National Student Accommodation Strategy – Rebuilding Ireland (2017)

The National Student Accommodation Strategy (NSAS) published in 2017 points to all current indicators that indicate a significant increase in full time students attending publicly funded Higher Education Institutes (HEI) over the next decade:

> *"The HEA Key Facts and Figures for 2015/2016, published in November 2016, highlighted that there were 179,354 full-time enrolments in Department of Education and Skills (DES) aided HEIs in the academic year 2015/2016 (169,363 of those students attend either a university or an institute of technology). Enrolments have increased from 173,649 in 2014/2015 and from 169,254 in 2013/2014".*

The International Education Strategy has set a growth target of 33% for the higher education sector, which will result in an increase in international students in both public and private HEIs from 33,118 in 2014/2015 to approximately 44,000 by the end of the 2019/2020 academic year."

The Strategy also points out the potential impact of PBSA on the private rented sector:

> *"There are a significant number of students renting from private landlords in Ireland as was highlighted in the National Economic and Social Council (NESC) Report "Ireland's Rental Sector: Pathways to Secure Occupancy and Affordable Supply" which was published in May 2015. The NESC report also outlined that on average, there are 2.73 persons per household in Ireland. While it is likely that the occupancy of a household comprising solely of students is going to be higher than the national average, it is a fair extrapolation to make that every 4 students housed in either PBSA or in Digs will free up an additional housing unit in the private rented sector that would otherwise have been occupied by students."*

In summary the National Strategy identifies that there will be significant continued demand for accommodation and that the delivery of additional PBSA has significant potential to free up housing for other demographics.

The NSAS identified that there was an unmet demand for 23,643 bed spaces in 2017 at a national level, the demand calculation data is based on students attending higher education institutions who have requested on campus accommodation against the number of bed spaces available on campus[1]. The strategy projected that there would be an excess demand of 25,754 bedspaces in 2019 which is set to reduce to 20,986 bedspaces in 2024. The Strategy recognises that in order to comprehensively address the shortfall in student accommodation investment is required from both public higher education institutions and private developers.

The most recent progress report for the NSAS was published in Q3 2019. The report concluded that at the end of Q3 2019, 8,229 bedspaces were completed, 5,245 bed spaces were under construction and 7,771 bedspaces had been granted planning permission, this denotes a total of 21,254 bedspaces[2]. Overall, this represents a shortfall in supply of 4,500 bedspaces based on the demand projections detailed in the NSAS. Whilst it is acknowledged that significant progress has been made in increasing the supply of purpose built student accommodation to meet the demand at a national level, it is evident that additional student accommodation is still required to meet the excess and growing demand.

Evaluation of Consistency

The shortage of student accommodation is happening in the context of the wider housing crisis. There is a need to increase the supply of all types of housing and accommodation, including student accommodation. The proposed development seeks to deliver 270 no. student bedspaces in Limerick within the city centre, to address the shortage identified. A Student Accommodation Demand and Concentration Assessment Report has been prepared under separate cover.

9.4 Climate Action Plan 2025

The Climate Action Plan 2025 (CAP25) is the third Climate Action Plan to be prepared under the Climate Action and Low Carbon Development (Amendment) Act 2021. CAP25 outlines Ireland's strategy to reduce greenhouse gas emissions, with significant focus on development and housing.

On the role of the public sector, CAP24 states that the public sector continues to demonstrate climate action leadership through strategic initiatives and governance frameworks, with public sector emissions decreasing by 2.7% in 2023 compared to 2022. Key targets include reducing GHG emissions by 51% and improving energy efficiency by 50% by 2030, with buildings accounting for 45-50% of the sector's energy consumption and transport representing 28% of emissions.

CAP25 acknowledges the role of waste prevention and the circular economy in driving down greenhouse gas emissions “through maximising the efficiency of our material use”. It identifies key actions related to circular economy and waste, including the implementation of the WAPCE and Whole of Government Circular Economy Strategy, and the prevention of plastic, food, construction and commercial waste.

Chapter 13 of the CAP specifically addresses the role of the built environment in decarbonisation. It notes that the sector accounted for 11.1% of Ireland’s greenhouse gases in 2022, down from 12.3% in 2021. The residential sector accounts for the majority of these – at 10.2% of total emissions. To play its part in achieving these targets, the residential sector will need to reduce its emissions by ~20% by 2025 relative to 2018 levels. CAP25 sets out key decarbonisation targets for the built environment sector as follows:

- All new dwellings designed and constructed to Nearly Zero Energy Building (NZEB) standard by 2025, and Zero Emission Building (ZEB) standard by 2030;
- Equivalent of 120,000 dwellings retrofitted to BER B2 or cost optimal equivalent by 2025, and 500,000 dwellings by 2030;
- Up to 0.8 TWh of district heating installed capacity by 2025, and up to 2.7 TWh by 2030;
- 170,000 new dwellings using heat pumps by 2025, and 280,000 by 2030

In response to Climate Action at a national level, Limerick City & County Council recently adopted its Climate Action Plan 2024 – 2029. It identifies targets and proposals across a number of areas. The proposed development adopts these thematic measures and considers them across the design team promoting a Circular Economy, promoting active travel, promoting nature based SUDs solutions, promoting green and blue infrastructure and maintaining biodiversity on application site.

Evaluation of Consistency

The proposed development addresses the issues of sustainability in a number of ways promoting regeneration of a brownfield site, adapting and reusing heritage buildings of significance; reusing

demolition material onsite insofar as possible; promoting compact development and modal shift away from use of the private car.

The higher density achieved in this application site located in the city centre, will contribute to the continued compact development of Limerick's existing urban areas. Several other documents enclosed with the planning application also outline sustainable design considerations.

An Energy Report, prepared under separate cover by ARUP, details the approach to energy efficiency on the application site. Further, the development has been designed using the Home Performance Index (HPI), Ireland's national certification system for sustainable residential developments, developed by the Irish Green Building Council (IGBC). HPI goes beyond energy efficiency, assessing factors like indoor air quality, thermal comfort, water usage, ecological impact, transport options, and the overall health and well-being of residents. The scheme has been designed in anticipation of achieving Gold standard.

9.5 National Biodiversity Plan 2023-2030

Ireland's 4th National Biodiversity Action Plan (NBAP) 2023–2030, launched in January 2024, outlines a comprehensive strategy to address biodiversity loss and integrate nature conservation into national development. The Plan emphasises a "whole-of-government, whole-of-society" approach, ensuring that biodiversity considerations are embedded across all sectors, including planning, infrastructure, and land use. The Plan includes five objectives by which the current national biodiversity agenda is to be set and the transformative changes required to ensure nature is valued and protected is delivered. Of relevance to the proposed development, are the targets and actions associated with Objective 2 and 3 on achieving the conservation and restoration needs of environmental designations.

Objective 2 seeks to meet urgent conservation and restoration needs. The proposed development comprising a city centre regeneration project can significantly contribute to Objective 2 by:

- Transforming the quarry reservoir, an underused urban space, into an urban park, with a focus on restoring restores habitats in the reservoir and supporting urban biodiversity.
- Removing invasive species from the application site and replacing with native planting schemes.
- Greening the urban area by providing significant public realm and urban landscaping throughout the development with linked green spaces, designed to enhance biodiversity.
- Incorporating sustainable drainage systems (SuDS) helps improve water quality and supports aquatic ecosystems, aligning with the goal of achieving "Good Ecological Status" for freshwater bodies.
- Redevelopment offers opportunities to remove invasive species and replace them with native planting schemes, contributing to Outcome 2G.

Objective 3 seeks to secure natures contribution to people and focuses on recognising, valuing, and enhancing the benefits that nature provides to individuals and communities. The proposed development enhances access to nature for the new community that will live in Cleeves and for the wider community, providing a new natural, urban park focused around the reservoir. The development also provides for nature based solutions integrated into a comprehensive landscaping scheme.

Overall, the NBAP mandates that public bodies incorporate biodiversity objectives into their functions and report on related actions, as stipulated by the Wildlife (Amendment) Act 2023. This legal obligation

ensures that biodiversity is a core consideration in public sector activities, including development and delivery of infrastructure.

Evaluation of Consistency

The proposed development has adopted an iterative approach to biodiversity, amending and altering design to ensure that biodiversity is not only maintained, but also enhanced on site. Chapter 7.0 Biodiversity, of the EIAR further assesses this environmental topic. The landscaping and public realm plan includes new planting across the application site to maiximise biodiversity opportunities, facilitating nature based SuDs solutions and enhancing natural features such as the reservoir and the quarry face.

10.0 REGIONAL POLICY

10.1 Regional Spatial and Economic Strategy for the Southern Region 2020

The Regional Spatial and Economic Strategy for the Southern Region (RSES) sets out a twelve year strategic development framework for the Southern Region. It establishes a broad framework for development and the way in which society, environment, economy and the use of land should evolve and works towards a broad vision of the Region's future, identifying key priorities for investment.

The city of Limerick is identified as a very important driver of national growth, a key regional centre that requires significant investment and growth. The RSES highlights the need to increase residential density through a range of measures including reductions in vacancy and re-use of existing buildings. A dynamic approach to land-use within the footprint of existing settlements is sought by the RSES in order to maximise the opportunity of urban regeneration and infill sites to contribute to sustainable compact growth and revitalisation of our existing settlements of all scale.

The RSES supports infill development and the regeneration of key sites with higher densities through the provision of a number of key objectives including:

- Objective RPO10 which seeks the prioritisation of housing and employment development in locations within and contiguous to existing city footprints where it can be served by public transport, walking and cycling.
- RPO163f which requires that a greater emphasis should be placed on encouraging mixed use developments on regeneration sites within the city and suburbs through supportive development plan policies to encourage sustainable mobility trip patterns.
- Objective RPO165 which seeks to ensure that *"local authorities, through appropriate Development Plan policies shall ensure the consolidation of development at higher densities within existing urban centres, with a focus on locations where it can be demonstrated that such development supports the use of walking, cycling and public transport".*
- Objective RPO176 promotes a "10-minute" city and town concept which "*aims to attain sustainable compact settlements whereby, a range of community facilities and services are accessible in short walking and cycle timeframes from homes or are accessible by high quality public transport services by connecting people to larger scaled settlements delivering these services".*

Evaluation of Consistency

The proposed development at Cleeves on a city centre site, promoting higher density development in the context of an overall mixed use development masterplan promotes the use of walking and cycling

along with public transport, within a 10 minute of services and facilities. The development will ultimately be delivered within a mixed use setting, all within a 10 minute walk of key services and facilities.

10.2 Limerick Metropolitan Area Strategic Plan (MASP)

Within the RSES there is a Metropolitan Area Strategic Plan (MASP) for Limerick. The MASP supports innovative approaches to securing long term transformational and rejuvenation focused compact city growth, including unlocking the potential of centrally located sites. Implementation of the Limerick 2030 economic strategy is identified as a national enabler to create modern, city centre office accommodation and a series of transformational city centre public realm projects It specifically identifies Cleeves as one of the key strategic sites which will contribute to the transformation of the city.
The RSES sets out seven Metropolitan Area Goals, the following of which, the proposed development will help deliver:

Goal 1: Sustainable Place Framework - This proposal will:

- Create a vibrant living and working city centre at the heart of a thriving metropolitan area and region;
- Result in the social, physical and economic renewal of inner city neighbourhoods;
- Result in compact urban development by achieving brownfield and infill targets through innovative design approaches;
- Provide for diverse residential accommodation types to accommodate the needs of different groups in society, including student accommodation;
- Enhance the quality of the existing city centre through retrofitting a high standard of infrastructure, services and amenities that improve the liveability and quality of the city centre;
- Achieve mixed use “five minute” sustainable city model where short travel time and ease of access via sustainable travel modes is achieved between where we live, work, access services, recreation and amenities;
- Provide a development where housing and jobs are integrated with high standards in sustainable transport, social and community infrastructure, quality public realm, recreation and amenities;
- Target urban regeneration measures to address dereliction and underutilised lands, particularlyin the inner city area;
- Rejuvenate our existing built assets and public realm;
- Protect and enhance the built and natural heritage; and
- Contribute to resilience to climate change and flooding

Goal 4 : High Quality Environment and Quality of Life - This proposal seeks to create a:

- Healthy city and heathy metropolitan area status with equity of access to health services, high ratios of access to quality open space and recreational amenities per population and attractive options to uptake active travel between home, work, education and access to services.
- Set a high quality performance standard for Limerick City to transition towards a zero-carbon future, achieve improved water and air quality, improved sustainable travel and other environmental and health performance standards as indicators for the healthy status of our metropolitan areas. This will be facilitated through a strong emphasis on using nature based solutions that contribute to multifunctional, connected blue green infrastructure.
- Foster a creative metropolitan area with vibrant cultural, arts and heritage scenes.

The Cleeves site in Limerick is identified within the Limerick MASP as a strategic brownfield regeneration opportunity, central to achieving compact urban growth and sustainable development

objectives. Its redevelopment is aligned with national policy goals for Transport Orientated Development (TOD), aiming to integrate residential, employment, and amenity uses with high-capacity public transport infrastructure. As part of Limerick's broader city-scale growth strategy, the Cleeves site plays a pivotal role in reversing urban sprawl, enhancing liveability, and contributing to the city's evolution as a regional driver of scale and sustainability. Further it satisfies the following policy objectives for the city:

- Policy Objective 10 - It is an objective to support the environmentally sustainable densification of Limerick City Centre, the assembly of brownfield sites for development and the regeneration and redevelopment of Limerick City and Suburbs to accommodate residential use.
- Policy Objective 13a - It is an objective to support the sustainable development of identified and future Strategic Employment Locations and to ensure the delivery of associated infrastructural requirements subject to the outcome of environmental assessments and the planning process.
- Policy Objective 4b - It is an objective to ensure quality infrastructure and quality of place is prioritised as an incentive to attract people to live and work in sustainable settlement patterns in the metropolitan area.

Evaluation of Consistency

The proposed development is aligned with the main principles and objectives of the MASP. The proposed development will provide a high-density city centre development supporting the principle of compact growth and will help to achieve the city's established population and housing targets. Critically, it facilitates development of an identified strategic brownfield regeneration opportunity site.

Cleeves is recognized in the MASP as a strategic employment location (Table 3) with capacity for 3,000 staff. However, as well as commercial space, the MASP recognises the potential of Cleeves to accommodate a mix of uses including education, tourism and commercial space. Whilst the MASP supports further plans for development of central sites for continued employment growth, it also supports the environmentally sustainable densification of Limerick City Centre, the assembly of brownfield sites for development and the regeneration and redevelopment of Limerick City and Suburbs to accommodate residential use (Policy Objective 10). The delivery of significant employment opportunities will be delivered in Phase III and IV of the Masterplan consequent to the delivery of Phase II.

11.0 SECTION 28 MINISTERIAL GUIDELINES

The key Section 28 guidelines as they relate to the proposed development are set out in the following sections. The key policy and guidance documents of relevance to the proposed development are as follows:

- Guidelines for Planning Authorities on Childcare Facilities (2001)
- Urban Development and Building Heights- Guidelines for Planning Authorities (2018);
- Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities 2024
- Design Manual for Urban Roads and Streets (2013)
- Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (2025);
- The Design Guide for State Sponsored Student Accommodation 2025;

- The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009); and
- NPF Implementation: Housing Growth Requirements (2025)

11.1 Childcare Facilities – Guidelines for Planning Authorities 2001

Section 2.4 of the Guidelines details appropriate locations for childcare facilities and requires that one childcare facility is provided for every 75 units. As already detailed in Section 7.4 of this report, a creche is accommodated at ground floor level within Block B in the Salesians Zone. The creche with a floor area of 381sqm has capacity for 34 no. children.

The Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities nuances the childcare requirement by stating that: 'Notwithstanding the Planning Guidelines for Childcare Facilities (2001), in respect of which a review is to be progressed, and which recommend the provision of one child-care facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, the threshold for provision of any such facilities in apartment schemes should be established having regard to the scale and unit mix of the proposed development'. One-bedroom units are excluded for the purposes of calculating requirements, as are the student bedspaces.

In the case of the proposed development, when the 97 no. 1 bed units and 6 no. studio units are removed, the remaining 131 no. units generate a childcare requirement.

For the purpose of calculating demand arising from the development, the provisions of the Childcare Guidelines are adopted. They indicate that 20 spaces are required for every 75 dwelling units, or a rate of 0.26 per unit. This would equate to a demand of 34 no. childcare spaces arising from the proposed development.

To address this demand, the proposed development provides for childcare facility, with capacity to accommodate 34 no. children.

11.2 Urban Development and Building Height Guidelines

The Urban Development and Building Height Guidelines 2018 further develops government policy as set out in the Revised NPF for achieving more compact urban forms. Whilst the Guidelines were prepared under the umbrella of the 2018 NPF, which is no longer in force, it is noted that they are equally applicable to the Revised NPF, which seeks to further promote and facilitate quality living environments in cities and towns by increasing population through increased residential density including greater height (NPO 22).

Paragraph 1.9 of the Height Guidelines state: "*Reflecting the National Planning Framework strategic outcomes in relation to compact urban growth, the Government considers that there is significant scope to accommodate anticipated population growth and development needs, whether for housing, employment or other purposes, by building up and consolidating the development of our existing urban areas".*

The Guidelines place emphasis on making best use of serviced sites in urban areas and state at Section 1.21: *"Increasing prevailing building heights therefore has a critical role to play in addressing the delivery of more compact growth in our urban areas, particularly our cities and large towns through enhancing*

both the scale and density of development and our planning process must actively address how this objective will be secured.".

The Guidelines go on then to address Development Management in Section 3.5.5. In paragraph 3.1 the Guidelines states the following in respect of development management principles: *"In relation to the assessment of individual planning applications and appeals, it is Government policy that building heights must be generally increased in appropriate urban locations. There is therefore a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility….."*.

The Guidelines states that '*Planning Authorities must apply the following broad principles in considering development proposals for buildings taller than prevailing building heights in urban areas in pursuit of these guidelines'*, each of which are outlined below and a response to each provided.

Does the proposal positively assist in securing National Planning Framework objectives of focusing development in key urban centres and in particular, fulfilling targets related to brownfield, infill development and in particular, effectively supporting the National Strategic Objective to deliver compact growth in our urban centres?

The proposed scheme involves the development of an underutilised, brownfield, serviced site on zoned city centre land, within the defined city centre of Limerick. The subject development will contribute towards delivering compact growth in Limerick City.

Objective 22 of the National Planning Framework also states that,:"*In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria enabling alterative solutions that seek to achieve well-designed high quality and safe outcomes in order to achieve targeted growth and that protect the environment*". In compliance with Objective 22 of the NPF, the proposed development will provide for increased heights and densities in a high-quality urban design to achieve targeted growth of the area.

The proposed development has been designed in accordance with the character area objectives as detailed in Table 12.4 of this report. The character area objectives for UCA 01 encompassing the application site acknowledges that Cleeves is located at a major crossing point on the River Shannon, promoting it as a significant site for increased height due to this position at an important crossing point at the base of the Shannon Bridge. The buildings have been designed to a high quality architectural standard including use of materials, public realm treatment and landscaping.

The NPF also states that "*to avoid urban sprawl and the pressure that it puts on both the environment and infrastructure demands, increased residential densities are required in our urban areas".* Objective 45 states that it is an objective to; "*Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration, increased building height and more compact forms of development".*

The NPF states that the demand for student accommodation exacerbates the demand pressures on the available supply of rental accommodation in urban areas. In the years ahead, student accommodation pressures are anticipated to increase. The location of purpose built student accommodation needs to be proximate to the centres of education, as well as being connected to accessible infrastructure such as walking, cycling and public transport. The proposed development which partially provides a purpose-built student accommodation scheme represents an opportunity to

provide for increased densities and increased heights in accordance with the NPF policies and objectives. The NPF provides for a strong emphasis towards increased building heights in appropriate locations within existing urban centres and along public transport corridors. The proposed development at 3 – 7 no. storeys is therefore considered appropriate in this location and in accordance with the NPF.

The scheme is therefore fully in accordance with the preferred approach of the Revised National Planning Framework.

Is the proposal in line with the requirements of the development plan in force and which plan has taken clear account of the requirements set out in Chapter 2 of these Guidelines?

Compliance of the proposed development with the building height provisions of the Development Plan is addressed in Section 12.4 (Table 12.4 & 12.5) of this Planning Statement which demonstrates compliance with the performance-based criteria for increased building heights of the Development Plan, and which was prepared by the Planning Authority in response to the Building Height Guidelines. The criteria are to ensure that a form and intensity of urban development is achieved that contributes to the overarching objectives of the Development Plan to create sustainable communities and high quality places for people to live and work.

Where the relevant development plan or local area plan pre-dates these guidelines, can it be demonstrated that implementation of the pre-existing policies and objectives of the relevant plan or planning scheme does not align with and support the objectives and policies of the National Planning Framework?

This does not apply, as the Development Plan has been prepared in accordance with the guidance set down in the Urban Development and Building - Heights Guidelines for Planning Authorities (December 2018).

Evaluation of Consistency

The Guidelines require planning authorities to apply a number of broad principles in considering development proposals for buildings taller than prevailing building heights in urban areas in pursuit of these guidelines. An evaluation of the proposed development is undertaken in respect of these criteria as detailed in Table 11.1. 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.

In consideration of Table 11.1 below, it should be noted that the Limerick Development Plan focuses delivery of tall buildings in the city centre, in particular the areas that have been identified as having potential for increased building height. In particular, tall building clusters will be encouraged at the Cleeves Site in accordance with the building classification criteria set out in the Building Height Strategy (Objective CGR 09). Please also see Table 12.4 and Table 12.5 of this report which provides an evaluation of the development against local policies in the Limerick Development Plan 2022 -2028.

Table 11.1 Specific Planning Policy Requirements Urban Development & Building Height Guidelines 2018		
Criteria	Requirement	Response
At the scale of the relevant city/town		
The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.		The application site is located within 1km (15 minute walk of Colbert Train Station. 5 no. bus stops are located within 500m of the application site providing access to the 306 and 343 bus routes. The application site is located 700m (10 minute walk) from the bus stop on O'Connell Street which accommodates the only bus route in Limerick City with a 15 minute frequency (route 304) and providing access to the key employment nodes of Raheen Business Park, University Hospital Limerick and the University of Limerick. Section 5.1 of this report details data extracted from the Limerick City Cordon Survey 2023, confirming that 98% of all buses surveyed at 10 no. locations in the city had capacity, with 53% of buses surveyed at only 25-49% capacity. The application site is well served by public transport with capacity and with a frequent service in the context of the existing service available in Limerick City.
Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.		While the application site is not within a designated sensitive or protected architectural area, it is strategically positioned within an urban context where topography, views, and the setting of key landmarks and Protected Structures within the application site are essential considerations. The proposed building height and design have been developed with careful attention to these factors, ensuring that the new structures complements and enhances the existing urban fabric rather than overwhelm or detract from it. The height of the buildings have been considered in relation to the surrounding landscape, ensuring a gradual transition in scale, form, and massing that respects the topography of the area. It is considered that the proposal represents a positive and thoughtful approach to regeneration of the site. It will contribute to the enhancement of the area's urban character, both through the introduction of modern architectural design and the careful handling of the building's relationship with the surrounding urban environment. In terms of cultural context, the proposal respects the broader urban heritage and significance of the area while introducing a contemporary

	architectural language that complements the city's ongoing development. A Landscape and Visual Assessment (LVIA) has been undertaken by Mitchell & Associates as part of the EIAR, detailed in Chapter 12.0. The Landscape, evaluating the potential impacts of the proposed height on the landscape character and key views. The proposed development will result in a change to the landscape, which will give rise to landscape and visual effects but as concluded in the EIAR, the residual operational impacts on the visual environment and amenity will be high-moderate and generally neutral or positive. It is considered that the proposed building height strategy for the scheme successfully manages to both consolidate the development through carefully considered increased buildings heights whilst also working sensitively with the existing context and prevailing pattern of development within the area. Key public realm and landscape interventions are proposed in order to enhance the development and facilitate integration into the surrounding environment, including provision of a significant Flaxmill Plaza and Quarry Park. The proposed development provides for the creation of an attractive, high quality, sustainable development within the existing city centre.
On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.	The proposed development is designed to contribute positively to the overall place-making of the area, while ensuring that the visual amenity of the surrounding environment is preserved. The proposal carefully considers the existing surrounding context, including the scale and massing of nearby buildings, to ensure that the new development integrates harmoniously with the urban fabric. Setback distances from adjoining properties and tapered building heights have been thoughtfully applied to maintain privacy, light, and air quality, thereby ensuring that the amenity experienced by surrounding buildings is not diminished. A variety of unit types and heights are provided across the application site offering a variety in scale and form while also providing an appropriate density for the site given its location and scale. In this respect, the proposed increased building heights make optimal use of these brownfield lands, reflective of building scale on the eastern side of the river. In consideration of the public realm and place-making, the proposed development will provide for a new destination in the city, accommodating a new public plaza and public park for the benefit of the wider community.

At the scale of district/ neighbourhood/ street	
The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape	The application site is underutilised and is enclosed, separated from the city, surrounded by high walls. The site is zoned for city centre and existing residential use. A mixed use development comprising residential use, commercial floorspace and significant public realm is permitted in principle and is generally acceptable, subject to compliance with those objectives as set out in other chapters of the Development Plan. Significant consideration has been given to how the development interacts with the surrounding area, with particular focus on the integration of the streetscape, nearby development, and the proximity to the River Shannon. This sensitive approach ensures that the proposal not only complements but enhances the existing environment, respecting the established character of the area while introducing a modern and high-quality architectural design. The high-quality design of the development, including its extensive public realm, is a key element in ensuring that the proposal makes a positive contribution to the urban neighbourhood and streetscape. It has been carefully crafted to harmonise with the existing surrounding development, while also contributing a distinct and modern architectural presence that will serve as a positive precedent for the overall Masterplan site. Moreover, the development makes a positive contribution to the wider urban environment by regenerating an existing underutilised brownfield site and facilitating the sensitive repair and reuse of significant buildings of cultural heritage merit including the Flaxmill, a protected structure. The proposal seeks to reconnect the application site with the river and complements other projects to be delivered by Limerick City and County Council as part of the ‘World Class Waterfront revitalisation and transformation project’. By delivering a high-quality development with significant public realm enhancement and residential development, in a well-connected location, the proposal responds to the demand for new housing while enhancing the urban fabric of the area. It ensures that the application site, which is currently underdeveloped, is put to a more productive and sustainable use, contributing positively to both the local community and the broader urban neighbourhood, whilst also facilitating the adaptive repair and reuse of architecturally significant buildings in future phases of the masterplan.

The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.	The proposed development provides for variety and interest in the block of development by providing a graduation in height and features to enhance the architectural quality of the building form, whilst at the same time respecting the existing built heritage of the site. Different materials, and fenestration as well as changes in massing across the application site will break up the uniform appearance of the site and create visual interest. The changes in height from 3 to 7 storeys on the application site creates a unique townscape, avoiding the feel of a monolithic one-dimensional development.
The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of "The Planning System and Flood Risk Management – Guidelines for Planning Authorities" (2009)	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. A key feature of the application site is the permeability between the different zones, notwithstanding a substantial change in levels across the site. The public realm strategy seeks to provide three new public areas including creation of the Reservoir/Quarry Park; development of the Flaxmill Square; and the enhancement of the Riverside Corridor intended to transform the quayside in front of the Cleeves site. The riverside public realm will offer a vantage point overlooking the river and city quays. The design approach to these areas has resulted in coherent and integrated public spaces that contribute to the creation of a sense of place and identity. In terms of flood risk management, the proposal aligns with the principles set out in "The Planning System and Flood Risk Management – Guidelines for Planning Authorities" (2009). The design of the development has has assessed flood risk, as set out in the Flood Risk Assessment Report prepared by ARUP accompanying this application, and incorporates appropriate mitigation measures into the public realm. The proposal provides for the raising of O'Callaghan Strand / North Circular Road as a flood mitigation measure, which has been integrated into the public realm works. This approach guarantees that the development contributes to the urban environment in a way that is sustainable, safe, and resilient, enhancing the overall quality of life for residents while mitigating flood risk and preserving the natural environment.
The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the	At 3 - 7 storeys, the proposed development is higher than its immediate traditional suburban context.to the north and south west.. However, the existing heritage buildings on application site, in particular the Flaxmill,

development is situated and integrates in a cohesive manner.	are buildings of scale, which set the context for building height on the application site. The application site is located within the identified city centre of Limerick, where buildings of a similar and greater height are already located, particularly along the rivers edge. The high-quality design proposed will ensure that the development contributes positively to the legibility of both the application site, the rivers edge and the wider urban area. Thoughtful consideration has been given to the layout, architectural form, the use of materials, and public realm to ensure that the development is easy to navigate and visually engaging. The design creates clear connections between the application site, its existing buildings and the surrounding areas, enhancing the sense of orientation and accessibility for both residents and visitors.
The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.	In an area dominated by suburban two storey houses, the proposed development provides for a mixture of apartment living and 3 bed townhouses whilst seeking to integrate student living, thereby positively contributing to a mix of dwelling typologies. The development includes a well-considered mix of 1, 2-, and 3-bedroom apartments, townhouses and triplexe units, providing a variety of options to cater to different household types, from single occupants and couples to small families. This mix ensures that the development meets the housing needs of a broad demographic, enhancing the overall diversity and vibrancy of the neighbourhood.
At the scale of the site/building	
The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.	The design of the proposed development has been carefully considered to ensure that the form, massing, and height are optimised to maximise access to natural daylight, ventilation, and views for future residents, while minimising the potential for overshadowing and loss of light. The orientation and placement of residential units have been specifically designed to allow for maximum natural light to penetrate into the interiors, ensuring well-lit living spaces throughout the day. The careful modulation of building massing and height across the application site also ensures that the development does not create adverse impacts on the surrounding properties.

Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting'. Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.	An iterative design approach has been adopted to maximise the schemes performance in terms of daylight and sunlight. A sunlight, shadow and daylight assessment has been prepared under separate cover and accompanies the development proposal. Further an assessment on neighbouring residential units was carried out by IES and is detailed in Chapter 16.0 of the EIAR. Section 8.3 of this report provides detail on the results of the sunlight, shadow and daylight assessment. For spatial daylight autonomy of the proposed development, a 95%compliance rate is achieved and for sunlight exposure 96% is compliant. Design features have been incorporated into the development where rooms do not achieve the daylight provision targets in accordance with the standards they were assessed against. These design features again help to balance off and compensate the lower levels of daylight measured in the applicable spaces and are summarised as follows: - • Percentage of apartments, triplexes or townhouses that are dual aspect (or greater) is 54.7% (128 out of 234) • The amount of Communal Amenity Space provided for the residential plots is 1,689sqm this is 8.5% more than the recommended minimum of 1,556sqm for the residential plots. • There is approximately Public Open Space of 7,817sqm to be provided in the proposals. This is over 15% of the site area. • 78.2% of the residential homes are in excess of minimum size standards and are oversized. (183 out of 234) • Floor to ceiling height in excess of 2.5m Further to this, design features specific to each dwelling have been incorporated into the development where rooms do not achieve the daylight provision targets in accordance with the standards they were assessed against. These design features, which include larger room sizes, help to balance off and compensate the lower levels of daylight measured in the applicable spaces. The Compensatory Measures, with respect to room size, its orientation with respect to open space; and increased floor to ceiling height, for each individual unit are detailed in Appendix A of the Sunlight, Daylight & Shadow Analysis Report accompanying the application. These compensatory mitigation measures ensure that despite some shortfalls in specific daylight and sunlight metrics, the overall residential quality remains high, aligned with national guidance and policy for sustainable urban development.

	For open space, the proposed communal open spaces and public open spaces will receive and in some instances exceed the level of sunlight in excess of the level recommended by the BRE Guidelines therefore, offering residents with a high standard of open space to enjoy throughout the year
Site Specific Assessment	
Specific impact assessment of the micro climatic effects such as down-draft. Such assessments shall include measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.	A wind and micro-climate assessment has been prepared by IES Consulting, as detailed in Chapter 16.0 of the EIAR. For the operational phase it was concluded that significant negative impacts on pedestrian comfort and / or safety are not predicted to occur as a result of the wind microclimate at the application site. In addition, no adverse impacts are envisioned on the proposed balconies and general ground floor amenities.
In development locations in proximity to sensitive bird and / or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and / or collision.	Biodiversity comprises Chapter 7.0 of the EIAR. A comprehensive assessment of birds and bats have been undertaken on the Masterplan site, including consideration of flight paths in the context of the proposed development. Section 7.4 of the Biodiversity Chapter considers the ccollision risk resulting from the proposed development. No significant impacts were identified as very few birds associated with the adjacent River Shannon or associated wetlands were recorded flying over the site. Further, the existing Masterplan already comprises a number of existing prominent, large, stationary objects that already have to be navigated. The introduction of the proposed development will not significantly alter the characteristics of the site in this regard. Bat houses are proposed, bat foraging routes have been maintained, bat sensitive lighting is proposed and it has been determined that the proposed development does not have the potential to impact flight lines and / or collision.
An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links	A Telecommunications Report prepared by ISM is enclosed as part of the application documentation to determine potential impact of the proposed development on existing microwave channels. The western most block of the proposed PBSA comprises telecommunication antennae at roof level to facilitate continued telecommunication channels. It was concluded that the proposed development will not affect telecommunication links in the area.

An assessment that the proposal maintains safe air navigation.	As part (western extremity) of the application site is located within the defined Coonagh Solar Safeguarding Zone, a Glint & Glare Assessment has been undertaken. The assessment concludes that that there is no potential for hazardous glint and glare effects to aviation or non-aviation receptors caused by the proposal.
An urban design statement including, as appropriate, impact on the historic built environment.	A Statement of Significance – Conservation Report has been prepared by Feilden Clegg Bradley Studios, with an assessment of the impact on Cultural Heritage – Architecture detailed in Chapter 9.0 of the EIAR. The accompanying Architect's Design Statement prepared by Feilden Clegg Bradley Studios and Bucholz McEvoy provides a comprehensive overview of the architectural proposal, detailing the application site and its context, as well as the design response in terms of heritage strategy, urban design, architecture, and landscape considerations. It also evaluates the proposal's impact on the surrounding area. Additionally, the report addresses the overall quality of the development, including the quantity, typology, spatial organisation, and design of the building blocks.
Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.	The proposed development is accompanied by an EIAR and NIS as already referenced in Section 8.0 of this report.

11.3 Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities 2024

The Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities replace the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities 2009. The Guidelines build on and update previous guidance to take account of current Government policy and economic, social and environmental considerations. The Guidelines expand on higher-level policies of the Revised National Planning Framework, setting policy and guidance in relation to the growth priorities for settlements, residential density, urban design and placemaking and introduce development standards for housing.

To achieve compact growth, the Guidelines support medium-density housing models, alongside traditional housing and apartment developments, recognising the significant population growth forecast and changing demographics. The guidelines also recommend specific standards for housing, such as minimum separation distance, private and public open space provisions, and car parking.

Density

Policy and Objectives 3.1 of the Guidelines refers to Building Density and states that "*It is a policy and objective of these Guidelines that the recommended residential density ranges set out in Section 3.3 are applied within statutory development plans and in the consideration of individual planning applications, and that these density ranges are refined further at a local level using the criteria set out in Section 3.4".*

Table 3.2 of the Guidelines clearly set out density ranges for Limerick City, with ranges broken down into City – Centre, City – Urban Neighbourhoods, City – Suburban/Urban Extension. The zoning of the application site as "City Centre" denotes its objectives as being: *"the most central and accessible urban locations in their regions with the greatest intensity of land uses, including higher order employment, recreation, cultural, education, commercial and retail uses."* The Guidelines state that it is a policy and objective of the Guidelines (Policy and Objective 3.1 refers) that residential densities in the range of 100-250 dwellings per hectare (dph) shall be generally applied in the city centre of Limerick.

Section 3.4 of the Guidelines seeks to further refine density, including consideration of factors such as site accessibility, local character, amenity and the natural environment. The density range for the application site, 100 – 250 dph, shall be then further considered and refined based on the consideration of centrality and accessibility to services and public transport; and considerations of character, amenity and the natural environment. It is considered that the application site falls within the "High-Capacity Public transport node or interchange" location as per Table 3.8. This location is defined as lands within 1,000 metres (1km) walking distance of an existing or planned high-capacity urban public transport node or interchange…; or within 500 metres walking distance of an existing or planned Bus Connects 'Core Bus Corridor' stop. The Cleeves site satisfies this criteria having regard to its proximity to Colbert Train Station, Bus Station and Arthur's Quay (approx. 1km) and planned Limerick BusConnects routes which will both provide an efficient and high capacity service at this location to and from the Limerick Metropolitan Area. Further detail with respect to public transport and accessibility is detailed in Section 5.1 of this report. Therefore, residential densities at the upper end of the 100-250 dph standard could be applied to the application site.

In terms of considerations of character, amenity and the natural environment, the guidelines seek to refine density within the context of the prevailing scale, and mass of buildings, urban grain and architectural language for the area with a responsive site design required; the historic environment; the impact on the environment and on protected habitats and species; the amenities of local residential properties in close proximity to the application site; and the capacity of water and waste water networks. In consideration of the local context, the application site is located in a low density residential and educational area with varying building heights ranging from two to seven stories. However, we note that increased heights exist within the wider city context, particularly on the southern side of the river. As such, the application site design is responsive and mindful of the existing context while also striking a balance at introducing a higher density and taller development to align with principles of compact growth. The sensitivities of the site from an industrial heritage perspective, comprising 2 no. protected structures along with other buildings of heritage significance, has also influenced the height and density of development on the application site. Matters relating to the environment and protected species have been addressed as part of the proposed development within the EIAR and NIS. The accompanying Engineering Services Report prepared by ARUP confirms that there is capacity in the local network in terms of water and waste water to cater for this development, with Confirmation of Feasibility received from Uisce Eireann..

Having regard in particular to the sensitives of the application site, a proposed residential density of 117 units per hectare is proposed for the site, as detailed in Table 11.2.

Table 11.2 Density Calculation		
SRSCG Appendix B Density Calculations	Note	Result
Calculate Net Site Area	This excludes Shipyard Site, Riverside Site, North Circular Road, Infiltration Gallery and Flaxmill as these are not intended for residential use. It includes 0.78 hectares of public realm	2.63 hectares
Calculate overall gross floor area		33,877sqm
Non residential gross floor area	Creche & Commercial Floorspace	680sqm
Residential gross floor area		33,197sqm
Residential as a portion of Development		98%
Site Area for Density Purposes		2.57 hectares
No. of Units	234 no. residential units plus 270 no. PBSA bedspaces (4 bedspaces equates to 1 residential unit)	302
Net Density		117 uph

The Guidelines contain a number of Specific Planning Policy Requirements (SPPR's) which seek to reduce traditional development management standards relating to a minimum quantum of private and public open space, rear garden sizes and car parking. This is done in an effort to afford greater flexibility to development proposals and to facilitate increased densities and compact growth.

Evaluation of Consistency

The proposed development is in compliance with the recently published Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities 2024 as detailed in Table 11.3.

Table 11.3 Specific Planning Policy Requirements Compact Settlement Guidelines 2024		
Policy & Objective	Summary	Development Compliance
3.1	The recommended residential density ranges set out in Section 3.3 are applied within statutory development plans and in the consideration of individual planning applications, and that these density ranges are refined further at a local level.	The Guidelines specify that residential densities in the range 100dph to 250dph (net) shall generally be applied in locations such as Limerick city centre. The proposed net density of 117 units per hectare falls within the range of density provisions promoted in the Guidelines.
4.1	The principles, approaches and standards set out in the Design Manual for Urban Roads and Streets, 2013 shall be implemented.	The principles of the Design Manual have been incorporated into the proposed development. Compliance with the requirements of DMURS is detailed in the Quality Assessment prepared by AtkinsRealis and accompanying the proposed development.

5.1	The requirement in the development plan shall be for public open space provision of not less than a minimum of 10% of net site area and not more than a minimum of 15% of net site area save in exceptional circumstances.	The proposed development by reason of its nature and function provides for significant public realm and open space. Some 0.78 hectares of the application site shall be developed as a new public plaza, comprising 28.3% of the net residential site area. The exceptional nature of the Masterplan with the imposing Cleeves chimney and Flaxmill Building associated with the objectives for the site including reconnecting the site with the river, necessitates provision of a new Riverside Quarter with extensive public realm.
4.2	The key indicators of quality urban design and placemaking set out in Section 4.4 are to be applied within statutory development plans and in the consideration of individual planning applications.	The Key Indicators of quality and design as detailed in Appendix D of the Guidelines have been considered and are detailed in Table 11.4 of this report and in the Architectural Design Report prepared by Feilden Clegg Bradley Studios and Bucholz McEvoy Architects
SPPR 1	A separation distance of at least 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained.	<u>Distance to Neighbouring Properties</u> 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. 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 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. <u>Distance internally within the development</u>

		A minimum 16m has generally been maintained between opposing windows above ground floor level within the Salesians blocks and the Stonetown Terrace blocks of development. The PBSA accommodation, which comprises one block of development with 3 no. wings has been designed to optimise orientation in terms of daylight and sunlight having regard to the significant quarry walls bounding and defining the application site and the provisions. The western and middle block are angled in a cone like manner, drawing daylight and sunlight into the scheme with 16m separation distance between both wings, narrowing to 11m. The blocks are angled to avoid direct overlooking, but it is acknowledged that 21% of the overall bed spaces provided have reduced separation distances below 16m as follows: ▪ 14.5m – 15.5m separation distance affects 24 no. rooms (9%) ▪ 11m – 12.5m separation distance affects 22 no. rooms (8%) ▪ 11m separation distance affects 11 no. rooms (4%). To mitigate any potential impact of overlooking, the facades of the wings have been angled away from each other with translucent glazing incorporated into the side glazed panels of units with reduced separation distances, thereby ensuring direct lines of sight do not hit panels of transparent glazing. Unlike the other apartment and triplexe units within the development, the PBSA is not intended for permanent occupation. Rather the units shall be occupied on a temporary basis during term time, such that the residential amenity of its occupiers will not be permanently impacted.
SPPR 2	Minimum private open space standards for houses: 1 bed house 20sqm 2 bed house 30sqm 3 bed house 40sqm 4 bed+ house 50sqm A further reduction below the minimum standard may be considered acceptable where an equivalent amount of high quality semi-private open space is provided in lieu of the private open space, subject to at least 50 percent of the area being provided as private open space	The 3 bed townhouses on the Stonetown Site have rear gardens comprising between 20sqm and 35.4sqm which is below the 40sqm private open space requirement. Specifically, 7 no. townhouses have rear gardens of 20sqm in area; 1 no. townhouse has a rear garden of 35.4sqm and 1 no. townhouse has a rear garden of 28sqm It is acknowledged that these are below the private open space standards for three bed units but they do comprise at least 50 percent of the area being provided as private open space, as required in SPPR2. The cumulative shortfall in private open space provision across the 9 no. townhouses is

		156.6sqm This shortfall is accommodated within the overall communal open space serving the Stonetown Terrace Zone. The zone is served with 380sqm of communal amenity space, yet the 38 no. units provided in the apartment block only require 220sqm as per SPPR2. Accordingly there is 160sqm of communal open space provided in lieu of private open space so that SPPR2 is being complied with. See the Architectural Accommodation Schedule for Stonetown Terrace
SPPR 3	Car parking should be minimised and substantially reduced and applicants should provide a rationale and justification for the number of car parking spaces proposed.	Section 7.10 justifies the provision of reduced car parking on site. A Traffic & Transport Assessment inclusive of a Mobility Management Plan (TTA) also accompanies the proposed development. In accordance with SPPR3, the proposed car parking provision is minimised given the subject site's city centre location, proximity to public transport nodes, services and amenities. The proposed development has been designed to minimise reliance on car use and encourage and support the use of sustainable modes of transport. In summary, the proposed residential car parking ratio is considered to be both appropriate. The site's location within the city centre provides access to a wide range of public transport options, including bus, train, and cycle routes, reducing the need for residents to rely on private car ownership. In addition, the application site is well-positioned near major employment hubs, educational institutions, retail outlets, and leisure facilities, all of which contribute to a highly accessible urban environment where residents can easily walk, cycle, or use public transport for their daily activities.
SPPR 4	Cycle Parking and Storage to be provided. Minimum cycle parking of 1 space per bedroom to be applied with additional space for visitor parking.	Secure and covered bicycle parking is accommodated to serve all blocks of development as detailed in Section 7.10 of this report and in the TTA. A total of 466 no. bicycle spaces are provided to serve the residential development including the student housing with a further 110 no. visitor bicycle spaces provided. Further visitor and residential bicycle parking is provided for in the Mobility Hub

Appendix D of the Guidelines provides a Design Checklist focused on the key indicators of quality urban design and placemaking. Key indicators of quality urban design and placemaking set out in Section 4.4 of the Guidelines are to be applied in the consideration of individual planning applications. This is undertaken in Table 11.4 below.

Table 11.4 Appendix D Design Checklist	
Question	**Answer**
Will the plan or development proposal establish a highly permeable and legible network of streets and spaces within the site that optimises movement for sustainable modes of transport (walking, cycling and public transport)?	✓ Yes – The proposed development establishes a highly permeable and legible network of spaces within the application site that optimises movement for sustainable modes of transport (walking and cycling) with pedestrian and cycle links provided internally between each development site and between the application site and the surrounding street network..
Have opportunities to improve connections with and between established communities been identified and responded to and in particular strategic connections between homes, shops, employment opportunities, public transport, local services and amenities?	✓ Yes – The application site is located within Limerick city centre. A strategic pedestrian and cycle link is provided from the Quarry site and Quarry Park to the North Circular Road, with a link onwards to the Condell Road. Further the site is reconnected with the River Shannon, with provision made for a possible future connection via a pedestrian bridge across the River Shannon.
Are streets designed (including the retrofitting of existing streets adjacent to or on-route to the site, where appropriate) in accordance with DMURS to calm traffic and enable the safe and comfortable movement of vulnerable users?	✓ Yes – The road layout is compliant with DMURS requirements as detailed in the Quality Audit prepared by AtkinsRealis
Has the quantum of parking been minimised (in accordance with SPPR4) and designed and located in a way that seeks to reduce the demand for private car use, promote sustainable mode of transport and ensure that the public realm is not dominated by parked vehicles?	✓ Yes – a reduced quantum of parking has been provided having regard to the sites' location within the city centre as detailed in Section 7.10 of this report and in the TTA..
Is the mix and intensity of land uses appropriate to the site and its location and have different uses been distributed in a complementary manner to ensure that there is a range of local services and amenities and access to public transport all within a short walk or cycle of homes?	✓ Yes – The application site is zoned city centre and established residential use. Residential use is permitted. Whilst the proposed development only comprises limited commercial floorspace at the ground level of the O'Callaghan Strand building, the Masterplan proposal provides for significant commercial and educational floorspace, to be provided in Phase III & Phase IV of the overall Masterplan.
Have a diverse and innovative range of housing types been provided to meet local and projected needs (having regard to the Housing Need Demand Assessment), supplemented by innovative range of housing typologies that support greater housing choice.	✓ Yes – The layout provides for a mix of unit types and sizes, as detailed in the Design Statement and Housing Quality Assessment by the project architects and as detailed previously in this report. A Housing Mix Statement prepared by HRA Planning also accompanies

	the proposed development. The development accommodates townhouses, apartments, triplexe units and student housing / bedspaces. The development also accommodates a full range of one to three bed units.
Has the plan or development proposal positively responded to natural features and landscape character, with particular regard to biodiversity, vistas and landmarks and the screening of protected structures, conservation areas and historic landscapes?	✓ Yes – the proposed development has responded to the natural features and landscape character of the application site, as comprehensively demonstrated in Chapter 7.0 and Chapter 8.0 & 9.0 of the EIAR relating to Biodiversity and Cultural Heritage. The application site has been reconnected with the river and maintains significant biodiversity features including the Quarry Reservoir and Public Park.
Have a complementary and interconnected range of open spaces and corridors been provided, that create and conserve ecological links and promotes active travel and healthier lifestyles?	✓ Yes – The proposed development establishes a highly permeable and interconnected range of open spaces and corridors which create and conserve ecological links and in particular protects the foraging route of bats on the Masterplan site with further linkage to accommodate connection to the Westfield Wetlands. The public open space extends from the river park, through the Flaxmill Plaza and into the Quarry Park & Reservoir.
Are public open spaces universally accessible and designed to cater for a range of active and passive recreational uses (taking account of the function of other spaces within the network)?	✓ Yes – the proposed open space areas cater for and are universally accessible to all ages and abilities. A comprehensive Landscape Plan has been prepare to demonstrate same.
Does the plan or development proposal include integrate nature-based solutions for the management of urban drainage to promote biodiversity, urban greening, improved water quality and flood mitigation?	✓ Yes – please refer to the engineering details by ARUP Engineers which provides for extensive SuDs measures on site. The reservoir will be used as an attenuation facility to be an extra storage facility over and above the SuDS
Does the layout, orientation and scale of development support the formation of a coherent and legible urban structure with particular regard to land uses, the location of gateways and landmarks, the hierarchy of streets and spaces and access to daylight and sunlight?	✓ Yes – The proposed development establishes a highly permeable and legible urban structure within the application site that optimises daylight/sunlight and connections. A Daylight & Sunlight Analysis has been prepared by IES andis detailed in Chapter 17.0 of the EIAR Refer to Table 11.1 of this report for further detail on the building height and scale.
Do buildings address streets and spaces in a manner that will ensure they clearly define public and private spaces, generate activity, maximise passive surveillance and provide an attractive and animated interface?	✓ Yes – the buildings address all open spaces to ensure passive surveillance. Public and private spaces are clearly defined by landscaping treatments. Please refer to the landscaping details and drawings prepared by Mitchells & Associates.
Does the layout, scale and design features of new development respond to prevailing development patterns (where relevant) and provide appropriate	✓ Yes – The proposed development will result in a change to the landscape, which will give rise to landscape and visual effects. It is considered

transitions with adjacent buildings and established communities?	that the proposed building height strategy for the scheme successfully manages to both consolidate the development through carefully considered increased buildings heights whilst also working sensitively with the existing context and prevailing pattern of development within the area, whilst respecting the existing built heritage on site.
Has a coherent architectural and urban design strategy been presented that will ensure the development is distinctive, complements the urban structure and promotes a strong sense of identity?	✓ Yes – please refer to the Architectural Design Statement accompanying the proposed development.
Does the development integrate well within its context and will the safety and amenity of future residents and of residential and other sensitive occupiers of adjacent properties be safeguarded to a reasonable extent.	✓ Yes – Great care has been taken to ensure the safety and amenity of future residents and of residential and other sensitive occupiers of adjacent properties be safeguarded to a reasonable extent.

11.4 Design Manual for Urban Roads and Streets

The Design Manual or Urban Roads and Streets (DMURS) was initially published by the Department of Transport, Tourism and Sport, together with the Department of the Environment, Community and Local Government in 2013, and updated in 2019. DMURS seeks to put well-designed streets at the heart of sustainable communities and supports boarder government policies on the environment, planning and transportation. DMURS provides the practical measures to achieve:

1. Highly connected street which allow people to walk and cycle to key destinations in a direct and easy-to find manner.
2. A safe and comfortable street environment for pedestrians and cyclists of all ages.
3. Streets that contribute to the creation of attractive and lively communities.
4. Streets that calm traffic via a range of design measures that make drivers more aware of their environment.

Compliance with the requirements of DMURS can be found in the Quality Audit prepared by AtkinsRealis.

11.5 Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities 2025

The Planning Design Standards for Apartments: Guidelines for Planning Authorities 2025 (the “Apartment Guidelines”) were published on the 8th of July 2025, replacing the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2023. The Apartment Guidelines are intended to promote sustainable housing, by ensuring that the design and layout of new apartments provide satisfactory accommodation for a variety of household types and sizes, including families with children over the medium to long term. The current proposal provides for 234 no. residential units and this Planning Report sets out the compliance of the proposal with the key policy requirements and standards as they relate to the proposed apartment units within the scheme as follows:

These Guidelines apply to the 225 no. apartment and triplexe units within the proposed development. They do not apply to the apartment blocks comprising the PBSA or the townhouses on the Stonetown site. The key relevant Specific Planning Policy Requirements (SPPRs) are summarised in Table 11.5 and are applied to the development to demonstrate compliance.

Table 11.5 Specific Planning Policy Requirements Apartment Guidelines 2025		
SPPR Number	Summary	Development Compliance
SPPR 1	With the exception of social housing developments, social/affordable housing provided for under Part V the Act or schemes to provide housing for older persons where a specific mix of unit sizes may be required, there shall be no restrictions within statutory plans in relation to the mix of unit sizes or types to be provided within apartment developments. There shall be no minimum or maximum requirements for apartments with a certain number of bedrooms.	The proposed development provides for a broad mix of unit types and sizes including 45.5% 1 bed units; 43.5% 2 bed units; and 12.3% 3 bed units. The Limerick Development Plan has been informed by an evidence-based Housing Need and Demand Assessment and no specific unit mix requirements have been set out in the Plan. Further, a Statement of Housing Mix Report which provides a detailed overview and examination of the demographic profile of the area in which the application site is located, with a view to establishing a justification for the proposed mix of units has been prepared and accompanies the proposed development.
SPPR 2	Minimum Apartment Floor Areas (Studio apartment (1 person) 32 sq.m; 1-bedroom apartment (2 persons) 45 sq.m; 2-bedroom apartment (3 persons) 63 sq.m; 2-bedroom apartment (4 persons) 73 sq.m; 3-bedroom apartment (5 persons) 90 sq.m . At least 25% of apartments in any proposed scheme of 10 or more apartments shall exceed the minimum floor area standard, by a minimum of 10%	The proposed development complies with the minimum apartment floor areas as follows: Studio Unit is 43.2sqm 1 bed unit between 49.4 – 55sqm 2 bed (3 persons) is 72.3sqm 2 bed (4 persons) unit between 82 – 93.8sqm 3 bed unit is 110.4 – 112.7sqm The total minimum floor area required for the 205 no. apartments as per the Guidelines is 13,633sqm. The total floor area of the apartment units being provided is 16,932sqm, which represents a floor area uplift of 24% across the entirety of the development. Some 78.2% of the residential homes are in excess of minimum size standards and are oversized. (183 out of 234) The proposed development is designedwell in excess of the minimum apartment size provisions and the 10% uplift required of only 25% of the apartment units. Please refer to the Housing Quality Assessment prepared by the Project Architects
SPPR 3	Dual Aspect - A minimum of 25% of units within a development shall be dual aspect.	Some 56.4% of the apartment units proposed are dual aspect units.

SPPR 4	Floor to ceiling heights - Ground level apartment floor to ceiling heights shall be a minimum of 2.7m.	Floor to ceiling height of ground floor units are 2.7m.
SPPR 6	The provision of new Communal, Community and Cultural facilities within apartment schemes shall only be required in specific locations identified within the development plan and shall not be required on a blanket threshold-based approach in individual apartment schemes.	The Limerick Development Plan does not identify any specific locations within the city or settlement hierarchy where communal, community, or cultural facilities are required to be provided as part of apartment schemes. As such, the requirement for these facilities does not apply to the application site under the terms of the Plan. Notwithstanding this, the proposed development includes the provision of a childcare facility at ground floor level within the Salesians site, with an associated secure outdoor play area and designated on street drop-off spaces. This facility will serve the needs of future residents as well as the surrounding community and represents a significant contribution to local social infrastructure. The inclusion of the childcare facility reflects a proactive approach to supporting the creation of a sustainable and inclusive residential environment. Further, the proposed development provides for a riverside canopy to facilitate external communal events and exhibition space.
SPPR 8	In terms of PBSA, the minimum required area for a single study bedroom without en-suite facilities is 8sqm and the minimum required area for a single study bedroom with en-suite facilities is 11.5sqm The minimum space requirements for kitchen/dining/living areas serving 10 and 12 persons are 3.6 sqm and 3.3 sqm per person	The development provides for 1 bed (ensuites) exceeding a floor area of 13sqm. Floor areas are therefore well in excess of the minimum standards set out in SPPR8. The other relevant typologies are the universal access bedrooms and studios which again have larger floor areas well in excess of the minimum floor area specified in SPPR8 The largest cluster comprises 8 no. bedrooms served by a kitchen/living/dining (KLD) area. There are no minimum standards provided for an 8 person cluster in SPPR8. However,each cluster proposed has a minimum shared KLD area of 4sqm per person, in excess of the standards detailed under SPPR 8. The PBSA also benefits from additional amenity space and terraces.

There are a number of non-specific policies in the Guidelines with which the proposed development has had regard to. Appendix 1 of the Guidelines contains minimum quantitative standards for bedroom floor areas, storage space, communal amenity space and private amenity space. The Housing Quality Assessment prepared by the Design Team Architects details compliance with these standards.

Private Amenity Space

The recommended private amenity space standards for apartments are set out in Appendix 1 of the Guidelines.The Guidelines state that planning authorities may accept a reduced provision of balconies where high quality, usable communal open space is provided within the scheme or where their amenity

value is negligible. In any case, the number of units without direct access to private amenity space within apartment schemes should not exceed 50%. In the case of the application site, the proposed development provides for the minimum required private open space provision of 5sqm for a 1 bed apartment; 6sqm for a 2 bed (3 person); and 7sqm for a 2 bed (4 person), whilst the 3 bed (5 person) triplexe units have in excess of 9sqm private open space.

Communal Amenity Space

In relation to the provision of communal amenity space for the one bed and two bed units and the 3 bed triplexe units in the development, the minimum requirement is the same as the private open space requirements. The provision of 205 no. apartment units and 20 no. 3 bed triplexe units requires provision of 1,405sqm of communal open space. The total communal open space provision on the site is well in excess of this quantum at 2,419sqm or 8.7% of the net developable area, in excess of the requirements in the Guidelines.

Playspace

The Guidelines has very specific requirements for play space serving apartment units comprising 25 or more units, for the specific needs of toddlers and children up to the age of six, with suitable play equipment, seating for parents/guardians, and within sight of the apartment building. There are also requirements of teenagers in schemes of in excess of 100 no. units. The Landscaping Plan provides for dedicated childrens playspace within each of the identified communal open space areas serving each development zone and provides for teenage space, in particular, within the Quarry Amenity Park in accordance with the requirements of the Guidelines.

11.6 The Design Guide for State Sponsored Student Accommodation 2025

This Design Guide replaces the "Guidelines on Residential Developments for 3rd Level Students" 1999. The Guide is an iterative framework that reflects best practices and supports the efficient delivery of state sponsored student accommodation. It is also intended, where appropriate, that the standards contained within the Guide can inform the planning and design of off-campus forms of student accommodation that are led by the private sector.

The Guide focuses on efficient delivery and cost-effectiveness through shared spaces like bathrooms and kitchen/living/dining areas. Its objective is to establish updated design standards that support the delivery of high-quality student accommodation by promoting consistency in design, improving cost-efficiency, and enabling the adoption of Modern Methods of Construction (MMC). While adherence to the Design Guide is not a mandatory policy requirement, specific standards set out in the Design Guide are identified as being of particular importance from the perspective of providing appropriate flexibility for these typologies to be applied within the planning system. Compliance with these specific standards have been dealt with under Section 11.5 of this report and in particular compliance with SPPR 8 of those Guidelines.

Specifically, the Design Guide allows for the provision of single study bedrooms without the requirement for an en-suite bathroom, with a minimum required area of 8 sqm for a single study bedroom and a minimum required area of 11.5 sqm for a study bedroom incorporating an en-suite bathroom. Further, the minimum space requirements for kitchen/dining/living areas serving 10 and 12 persons are 3.6 sqm and 3.3 sqm per person, respectively. The cluster size has increased to a maximum of 12 bedrooms.

Evaluation of Consistency

Mindful that compliance with the Design Guide is not a mandatory policy requirement, it is noted that the Design Guide can inform the planning and design of off-campus forms of student accommodation that are led by the private sector.

Compliance with the standards for one bed (ensuite) are mandatory as per the Apartment Guidelines 2025 and the proposed development complies with these mandatory requirements with a floor area of 13sqm, well in excess of the required 11.5sqm.

The proposed PBSA comprises 36 no. clusters ranging in size between 4 – 8 bedrooms, including 1 no. 4 bed cluster; 7 no. 5 bed clusters; 5 no. 6 bed clusters; 1 no. 7 bed clusters; 22 no. 8 bed clusters; and 18 no. studios. It is noted that the mandatory area thresholds from the Design Guide, as detailed in the Apartment Guidelines 2025 are for 10 and 12 person clusters. There are no mandatory requirements for 4 - 8 bed clusters.

The Design Guide does contain recommended standards for 4, 6 & 8 bed clusters with shared kitchen/living/dining spaces (KLDs) of 5.5sqm (4 person); 4.5sqm (6 person) and 4sqm (8 person). The 22 no. 8 bed clusters, comprising 61% of the overall number of clusters, complies with the recommended 4sqm KLD provision set out in the Design Guide.

The remaining 14 no. clusters, accommodating 4sqm of KLD per person, is below the recommended standards for 4 and 6 person clusters. However, in consideration of this fact, cognisance must be had to the significant floor area afforded to all bedrooms in the proposed PBSA which is 1.5sqm above the minimum standard recommended in the Design Guide. Further, the proposed PBSA has significant additional communal amenity areas and terraces including meeting rooms and study rooms comprising a total 1,377sqm in area which is not required in the Design Guide and is provided as additional amenity space for the PBSA thereby compensating for the smaller floor area provided for the KLD. In accordance with the provisions of the Design Guide, the PBSA provides for modern facilities that are functional, sustainable, maintainable, flexible, and safe, with high quality architectural design.

11.7 The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)

The Guidelines were developed by the Department of Environment, Community and Local Government (DECLG) and the Office of Public Works (OPW) to ensure that flood risk is considered in planning and development management. They emphasise the importance of sustainable development practices that mitigate flood risks while promoting effective land use planning.

They seek to avoid development in flood-prone areas, adopt a sequential approach to flood risk management; and integrate flood assessments into the decision-making process for planning applications and appeals, ensuring that flood risks are adequately evaluated before development is approved.

Evaluation of Consistency

A Site Specific Flood Risk Assessment (SFRA) prepared by ARUP Engineers is to assess all types of flood risk pertaining to the application site and the proposed development. The assessment investigates potential sources of flood risk and includes the effects of climate change. The assessment examines

the impact of the development and the effectiveness of flood mitigation and management procedures proposed

The SFRA identified that the Cleeves site is currently at risk of flooding from the following sources:

- Tidal flood risk: The Shipyard Site and Quarry Site are at risk of flooding during the 1 in 200-year flood event, Flax Mill site could be at risk of flooding in the future, when climate change allowances for sea level rise are considered.
- Pluvial flood risk: The Quarry site, Salesian Site and Stonetown Terrace could potentially be at risk from overland flows from the upper catchment.
- Groundwater flood risk: The risk of groundwater flooding is deemed low.
- Reservoir flood risk: An inlet flap valve has been identified with a potential to allow water ingress from the river to the Quarry Site.

A variety of flood mitigation measures have been proposed and are presented in the SFRA including but not limited to building floor raising, flood resilient and resistant measures and raising of North Circular Road to provide safe access and egress.

Residual risks were identified for the above mitigation measures, including low levels on the North Circular Road, such as at the connection with existing levels northwest of the Shipyard site which could impede safe access and egress for emergency vehicles to some buildings and provide a flow path to the Quarry site. In order to mitigate against these risks, new a new pedestrian connection between Condell Road and the North Circular Road is proposed set between 6.78m AOD and 5.7m AOD. This will provide flood mitigation for the development, and safe access /egress in the interim until the Shipyard site is fully developed.

11.8 NPF Implementation: Housing Growth Requirements, 2025

On 29 July 2025 the Minister for Housing, Local Government and Heritage issued direction in the form of Section 28 Guidelines entitled ‘NPF Implementation: Housing Growth Requirements’. Specifically, the Minister has directed each planning authority to review their Development Plans to ensure consistency with new national housing targets set by the National Planning Framework (NPF) in April 2025.

At the city and county level, Limerick City and County Council is now required to review the Limerick Development Plan against new annual housing targets set. Notably and as published in the new Guidelines, the new targets identified for the Limerick extend to 2,599 housing units per annum between 2025 and 2034 and a further 2,740 units per annum between 2035 and 2040. There is an additional headroom figure of 50% to be provided for.

Evaluation of Consistency

This application delivers the equivalent of 302 no. residential units at a net density of 117 units per hectare, appropriate to a city centre site. This proposal is considered to deliver on the spirit of the guidelines and policy objective requirements to support the delivery of housing at key locations whilst ensuring that the proposal is sensitive to the established built heritage and local context.

12.0 LOCAL POLICY

12.1 Limerick Development Plan 2022 - 2028

The Limerick Development Plan 2022-2028 (also referred to as the 'Development Plan') sets out Limerick City & County Council's policies for the development of Limerick City to 2028 and beyond. As set out in the Development Plan, the vision for Limerick City is to continue to grow as the centre of economic, social and cultural development for the Mid-West Region.

The following sections of this report evaluate the proposed development against a number of different themes set out in the Development Plan.

12.1.1 Zoning

The application site has two land use zonings afforded to it in the Development Plan. Whilst most of the site is zoned for 'City Centre' mixed-use purposes, Stonetown Terrace is largely zoned for 'Existing Residential Use'.

The objective of existing residential use is *"to provide for residential development and to protect and improve existing residential amenity*" whilst the purpose of the existing residential zoning is "*intended primarily for established housing areas. Existing residential amenity will be protected while allowing appropriate infill development. The quality of the zone will be enhanced with associated open space, community uses and where an acceptable standard of amenity can be maintained, a limited range of other uses that support the overall residential function of the area, such as schools, crèches, doctor's surgeries, playing fields etc.".*

The landuse zoning objective for the 'City Centre' seeks, *"To protect, consolidate and facilitate the development of the City Centre commercial, retail, educational, leisure, residential, social and community uses and facilities',* whilst the stated purpose of the landuse zoning objective is, *"To consolidate Limerick City Centre through densification of appropriate commercial and residential developments ensuring a mix of commercial, recreational, civic, cultural, leisure, residential uses and urban streets, while delivering a high-quality urban environment which will enhance the quality of life of residents, visitors and workers alike".*

Residential use is 'permitted in principle' under both zoning types. Whilst commercial / retail use is permitted in principle under city centre zoning, such use is 'generally not permitted' under existing residential use zoning. In this regard it should be noted that the sole use proposed in Stonetown Terrace is that of residential use, in full compliance with the zoning provisions of that site.

Transitional Zoning

Notwithstanding the 'city centre' zoning afforded to a substantial area of the application site, it is noted that the application site is patially zoned for existing residential use and is located adjoining land zoned for 'Existing Residential' use purposes. Accordingly, the application site could be identified as being within a transitional zone.

Section 12.4 of the Development Plan notes the following: "*Transitional Zoning Areas should be considered in the design of developments in order to avoid abrupt transitions in scale, density and use in the boundary areas of adjoining land use zones. In particular, developments which would be*

detrimental to the amenities of residential properties should be avoided in order to protect the amenities of such properties".

Existing residential development adjoins the application site on the northern and north eastern part of the site and regard has been had to these existing residential developments in advancing development on the site. Generous separation distances and heights reduced to six and three storeys are proposed on the boundaries of the site neighbouring existing residential development to minimise any potential for overlooking, overshadowing or overbearing. The minimum separation distance between the proposed development and existing housing is detailed in Table 11.3 in response to SPPR1

The proposed development is designed to strike a careful balance between protecting the existing residential amenities, maintaining the established character of the area, and accommodating the need for sustainable new development. The project has been thoughtfully planned to minimise any potential negative impacts on the surrounding residential community, with particular attention given to maintaining privacy, access to light, and the overall comfort of neighbouring properties. Consideration must also be given to the promotion of tall buildings within the city centre and on key Strategic sites identified including Cleeves (Objective CGR 09 and Objective CRQ 01).

12.1.2 Core Strategy

Chapter 2 of the Development Plan sets out its Core Strategy and addresses the issues of housing, employment and infrastructure. Policy CS P1 states it is a policy of the Council to implement the Core Strategy for Limerick to ensure consistency with policies at a national and regional level, in particular population targets and distribution. In this regard, the Strategy identifies the city centre as a Central & Accessible Location, at Level 1 in the Settlement Hierarchy.

Table 2.6 in the Development Plan specifies that a minimum net density of 100+ dwelling units per hectare is required (Underline Our Emphasis), at appropriate locations within the city centre..

Policy CS P2 states it is a policy of the Council to support the compact growth of Limerick City Metropolitan Area, towns and villages by prioritising housing and employment development in locations within and contiguous to existing City and town footprints where it can be served by public transport and walking and cycling networks, to ensure that development proceeds sustainably and at an appropriate scale, density and sequence, in line with the Core Strategy Table 2.7. The application site is zoned, serviced and is proximate to services and facilities, all in accordance with provisions set out in the core strategy of the Plan.

Section 2.3.1 of the Development Plan sets out the population and household projections for Limerick City and Suburbs within the lifetime of the plan:

Table 12.1 Population & Household Projections		
	2016 - 2028	Q2 2022 – Q2 2028
Additional Population	34,692	30,621
Additional Household		11,442

Source: Limerick Development Plan 2022 -2028

The proposed development will provide the equivalent of 302 no. residential units contributing towards the forecasted housing growth for the city. This proposal aligns with the recently published 'NPF Implementation: Housing Growth Requirements' 2025, where the new targets identified for the Limerick

extend to 2,599 housing units per annum between 2025 and 2034 and a further 2,740 units per annum between 2035 and 2040.

The application site is identified as a former brownfield site and has been categorised as a Tier 2 infill site within the Limerick Development Settlement Capacity Audit. The application site is identified as 'Site 22' as per Map 1 Volume 2a of the Development Plan and is identified as being suitable for the provision of residential development (Table 1) with the potential to yield circa 250 units. In this regard it is noted that the potential residential yield is an estimate only. The actual density achievable on any particular site will be assessed on a case-by-case basis and dependent on compliance with all quantitative and development management standards of this Development Plan and relevant Section 28 Guidelines.

The Settlement Capacity Audit also outlines the availability of strategic infrastructure to service these sites. Whilst the application site has been identified as a Tier 2 site, it should be noted that the Development Plan clarifies that *"lands identified as being at risk of flooding are therefore ranked as Tier 2".* The Tier 2 labelling acknowledges that a Site-Specific Flood Risk Assessment with specific flood mitigation design or work is required and which shall require significant investment on the part of the developer. A Site Specific Flood Risk Assessment has been undertaken for the project with specific design mitigation measures inbuilt int the development proposal, including:

- Minimum Finished Floor Levels of 5.7m AOD for commercial uses and ; Higher allowance 6.2m for residential / habitable spaces.
- Safe access and egress to be provided from all buildings for emergency vehicles. The proposed development raises North Circular Road (NCR) above 5.7m AOD to provide safe access and egress.
- A new perimeter drain will intercept any offsite overland flows from adjacent properties to the north of the site to safely divert overland flows away from the properties during a significant rainfall event.

12.1.3 Strategic Opportunity Site

The Cleeves site is identified as a key strategic site in the Development Plan, earmarked for redevelopment in Limerick City Centre, and expected to have transformational effects on the revitalisation of the City. The Development Plan recognises that centrally located and strategic brownfield and underutilised lands, such as Cleeves, presents Limerick City with an opportunity to achieve the economic and social objectives associated with the targeted population growth for the city in a sustainable manner. It recognises that the key tool for the revitalisation of Limerick is the Limerick 2030 – An Economic and Spatial Plan.

The World Class Waterfront development is a key revitalisation and transformation project under the Limerick 2030 Plan. The World Class Waterfront project comprises three elements – the Riverside Infrastructural Works, Cleeves Riverside Quarter and the University of Limerick City Campus. The project focuses on mixed-use brownfield regeneration, adaptive re-use and reversal of vacancy and dereliction in Limerick City Centre. The Development Plan acknowledges that the World Class Waterfront project will deliver on the NPF objectives of compact growth, sustainable mobility and placemaking/ public realm, which has the potential to make a transformational difference to Limerick City. In combination, the three elements of the project will facilitate an increase in the population residing and working in the City Centre.

In addition to accommodating residential development, Cleeves is identified as a Strategic Employment Location in the Development Plan (Objective ECON 017). The Development Plan acknowledges that

additional lands are required for office space over and above that provided at Gardens International and proposed in the Opera Square and Cleeves Riverside Quarter developments (Section 5.8.2). Objective ECON 017 seeks to "*Promote, facilitate and enable a diverse range of employment opportunities by facilitating appropriate development, improvement and expansion of enterprise and industry on appropriately zoned lands, accessible by public and sustainable modes of transport, subject to compliance with all relevant Development Management Standards and Section 28 Guidance at Strategic Employment Locations and other appropriately zoned locations in a sustainable manner*".

In this regard Phase IV of the Cleeves Masterplan, as already presented in Section 3.4 of this report, is intended to accommodate significant commercial development, including circa 23,000sqm of commercial floorspace, with significant buildings of up to 8 storeys in height and a landmark building extending towards the river. Further, the proposed Phase III TUS Campus development has the potential to accommodate significant employment in the delivery of educational services and facilities on the Masterplan site. Accordingly, the proposed development comprising residential and public realm works does not compromise the future development of the site to accommodate future employment opportunities as detailed in the Masterplan.

The Development Plan acknowledges 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".* Objective CRQ 01 clarifies that it is an objective of the Council to ensure that the criteria set out In Table 12.2 are addressed in any redevelopment.

Table 12.2 Objective CRQ 01 Criteria	
Criteria	Response
Implement a high-quality urban design solution with a mix of uses, including residential, commercial, tourism/ancillary retail and amenities connecting to the city core.	The Cleeves Masterplan provides for a high quality urban design solution providing for a mix of uses. The proposed development is being advanced as Phase II of the overall masterplan to address the critical need for housing in Limerick City. The development is well connected to the city core via Shannon Bridge and this may be further enhanced in the future with a new pedestrian bridge to be constructed across the River Shannon by Limerick City & County Council.
Respond to the site context to generate a sustainable solution that creates a distinct riverside quarter, respecting the significant historic buildings, enabling the potential for greater height and density, while creating a landmark City gateway.	The Cleeves Masterplan demonstrates how a landmark city gateway will be facilitated through redevelopment on site. The Masterplan and the proposed development has responded to the context through the stabilisation and repair of historic buildings whilst providing for buildings of greater height and density.

Investigate, assess and integrate the historic buildings and industrial heritage of significance, protect key features of historical merit and implement conservation principles to assist in the appropriate management of protected structures, in a manner that facilitates the practical regeneration and reuse of the site.	A practical Conservation Led Strategy has guided development on the site from the outset. Building and fabric retention has been facilitated through a detailed understanding of the Masterplan site as detailed in the Statement of Significance the proposed development. Phase I of the development seeks to repair and stabilise buildings of significance whilst the proposed development advances new build residential units (Phase II). Phase III will facilitate the reuse of significant heritage buildings on the Masterplan site. The Statement of Significance investigates and assesses the historic buildings and industrial heritage of significance. Chapter 9.0 Cultural Heritage Architecture in the EIAR rationalises the demolition proposed and rationalises the integration of historic buildings and protected structures within the practical regeneration and reuse of the site. The conservation of protected structures is managed through phased delivery of different stages of on site, with Phase II being advanced following ongoing stabilisation and repair works under Phase I.
Enhance permeability of the public realm by removing and/or decreasing the effects of existing barriers to and within the site, through initiatives including: • Public access, walking and cycling networks; • Enhanced streetscape and legibility; • Removal of section(s) of the existing Cleeves wall; and • Improving road and traffic circulation.	The proposed development seeks to enhance permeability of the public realm. It facilitates a new access onto the North Circular Road providing pedestrian and cycle access into the Quarry Park. This initiative necessitates the removal of 2 no. houses currently fronting North Circular Road within the application site. It further reduces existing barriers between the application site and the city by sensitively removing part of the surrounding stone boundary wall, reconnecting the application site with the river. The development seeks to improve road and traffic circulation by redefining existing and proposed 'shared spaces' prioritising the pedestrian and cyclist.
Enhance the legibility of the natural and built environment and landscape and connections between place and space, whilst ensuring delivery of a high-quality public realm that relates and links to the city core and the River Shannon.	The landscape and public realm strategy provides for significant enhancement works, connecting the river with the Flaxmill Plaza and on through to the proposed Quarry Park which promotes the existing reservoir on the application site.
Identify and enhance natural heritage areas and features, particularly where opportunities exist to improve biodiversity and provide for quality public realm.	Chapter 7.0 of the EIAR considers biodiversity within the proposed development and provides measures which seek to protect bats and other sensitivities within the application site and throughout the Masterplan site. Quality public realm is provided extending from the river corridor to the Quarry Park, with active and passive hard and soft landscaping provided throughout.

Support sustainable modes of transport and use of the public realm.	Reduced car parking, significant bicycle parking provision, provision of a mobility hub with electric charging points and improved pedestrian and bicycle connectivity, all seek to support sustainable modes of transport.
Facilitate a holistically sustainable and low carbon development that is energy efficient and future proofed for a changing climate.	Chapter 15.0 of the EIAR deals with Climate and identifies the measures promoted to ensure that the development is energy efficient. The development has been designed using the Home Performance Index (HPI), Ireland's national certification system for sustainable residential developments, developed by the Irish Green Building Council (IGBC). HPI goes beyond energy efficiency, assessing factors like indoor air quality, thermal comfort, water usage, ecological impact, transport options, and the overall health and well-being of residents. The scheme has been designed in anticipation of achieving Gold standard.
Promote a site-specific approach, reflecting emerging best practice, in addressing flood risk and in the adaptation of protected structures and buildings of significance.	A Site Specific Flood Risk Assessment (SFRA) has been prepared by ARUP. The SFRA addresses flood risk with respect to the existing built heritage complex and the retention of buildings and features of historic significance on Masterplan site.

12.1.4 Building Height

In accordance with the requirements of the Urban Development and Building Height Guidelines for Planning Authorities (2018), a Building Height Strategy for Limerick City has been incorporated into the Development Plan. Located within the Urban Character Area 1 (UCA 1) City Centre, the Development Plan favors infill and brownfield development and requires that new development shall have regard to the Limerick 2030 Economic and Spatial Plan.

With respect to UCA 1, the Development Plan states that the Building Height Strategy shall guide development within this area, particularly taller buildings. It identifies a number of sites, including Cleeves, *"where there are larger scale and vacant or lower density sites and recommends that taller buildings should be provided within a cluster of varying height, creating a coherent grouping of buildings that relate to each other and to the surrounding urban context in terms of street layout, massing and design".*

Objective CGR 09 promotes the Cleeves site as a site with the potential for increased building height where tall building clusters will be encouraged. It also details a number of criteria which must be complied with as detailed in Table 12.4.

Table 12.4 Building Height Compliance		
Objective No.	Objective Detail	Development Compliance
CGR09a	Ensure that all new tall buildings in Limerick City are designed in accordance with the character area objectives, tall building recommendations and criteria set out in the Development Management Standards. All such buildings shall be of an exceptional architectural quality and standard of design and finish.	The proposed development has been designed in accordance with the character area objectives as detailed in Table 12.4. The buildings have been designed to a high quality architectural standard including use of materials, public realm treatment and landscaping. The character area objectives for UCA 01 encompassing the application site acknowledges that Cleeves is located at a major crossing point on the River Shannon. It is a significant site for increased height due to this position at an important crossing point at the base of the Shannon Bridge.
CGR09b	Focus delivery of tall buildings in the City Centre, in particular the areas that have been identified as having potential for increased building height. In particular, tall building clusters will be encouraged at The Quays, Colbert Station Quarter, Cleeves Site and The Docklands in accordance with the building classification criteria set out in the Building Height Strategy. There shall be a general presumption against tall buildings in other areas, except at designated areas and the gateway locations identified in the Tall Buildings at City Level Map.	The application site is located in the city centre on a site identified for tall building clusters.
CGR09c	Protect the unique intrinsic character, scale and significant views of Limerick City, the skyline and key landmark buildings in the delivery of increased building heights, through the application of the Tall Building Classifications, Recommendations, High Level Principles and Assessment Tools and Criteria set out in the Building Height Strategy.	The proposed development has been assessed against the criteria set out in Section 2 of the Urban Development and Building Height Guidelines and the 11 criteria as set out in the Building Height Strategy for Limerick as detailed in Table 11.1 of this report. The assessment in Table 11.1 also incorporates consideration of the criteria set out in Policy TB7: Assessment Criteria for Tall Building in the Building Height Strategy. The development is advanced having regard to the criteria detailed in Table DM 1 in the Development Plan.
CGR09d	Ensure applications for tall buildings are supported by the following assessments and any additional assessments required at the discretion of the Planning Authority - Environmental Assessment, Wind Analysis, Sunlight and Daylight Analysis,	The planning application is accompanied by an Environmental Impact Assessment Report (EIAR) which includes a Sunlight and Daylight Analysis, Pedestrian Wind Comfort & Distress Modelling; Verified View Analysis, Landscape & Visual Impact Assessment and

	Verified View Analysis, Landscape and Visual Impact Assessment, Architectural Design Statement, Traffic Impact Assessment including a Mobility Management Plan for non- residential uses, Building Services Strategy.	an Acoustic Assessment. The proposed development is also accompanied by an Architectural Design Report, Traffic Impact Assessment including a Mobility Management Plan and an Energy Strategy.

The Limerick City Building Height Objectives, Recommendations and Criteria set out in Table DM 1 establishes a number of area objectives for Cleeves, with a number of tall building recommendations. These are considered in Table 12.5.

In advance, 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.

Table 12.5 Limerick City Building Height Objectives	
Objective / Recommendation	Comment
Height should be considered on the impact of the overall River Shannon and height must also be assessed by verified views along the River Shannon.	The presence of a taller building on the Masterplan site helps frame the River and the pattern of taller buildings along the Quays. The Cleeves 'Masterplan' site is the only major development opportunity on the right bank of the Shannon. It should take its essential character as a gateway and vista of and from the City. A full LVIA is contained in Chapter 12.0 of the EIAR.
New buildings should have appropriate scaling to the existing houses, with a balance of height and economic use taken into account.	The existing uses and context provide limited guidance, beyond the significant scale and massing of the industrial buildings and chimney. However, the unique locational and prominence of existing buildings on site provide a unique opportunity for a taller building, providing views of and from the city. The general form and massing of the buildings borrow from that of the Flaxmill with clear parallels in the rhythm of the façade of the historic and new buildings. An appropriate balance has been struck mindful of neighbouring structures in Clanmaurice Avenue, Clanmaurice Gardens and Stonetown Terrace.

The fabric of the area as well as the complex elements that contribute to the character of the site need to be protected.	The design of new buildings acknowledge the industrial heritage of the built environment and traditional materials where appropriate. Significant fabric and buildings are retained on application site, with the old and established integrated into the new and proposed.
It is recognised that there may be an impact on neighbouring residential buildings as the height is generally lowline in the surrounding area. However, there is a high quality townscape and placemaking argument which can be deemed appropriate for an area of height due to the nature of the site	The proposed development has been informed by Daylight Sunlight and Overshadowing studies to ensure that the residential amenities of neighbouring properties are not adversely / significantly impacted. Contributing to the building typologies in the area is not applicable given the nature of the Cleeves Mastreplan site and the fact that the site has been identified for the provision of taller buildings within a cluster of varying height.
The development of this area requires the implementation of a strategic masterplan that allocates areas of height in a careful manner, while responding to existing guidance within the Limerick 2030 Plan.	A Cleeves Masterplan has been prepared responding to existing guidance in the Limerick 2030 Pan whilst also responding to more up to date Section 28 Guidance and market demands.

12.1.5 Housing & Student Accommodation

Section 4.2.10 of the Development Plan recognises that students are an increasingly important part of the housing demand in Limerick, particularly in Limerick City, Suburbs and Annacotty. The Development Plan also recognises that the third level institutions in the city are seeking to increase student numbers, within the lifetime of the Plan, which accordingly will result in increased demand for high quality student accommodation.

Objective HO O8 supports the provision of high quality, professionally managed purpose built student accommodation provided such accommodation satisfies a number of criteria, as detailed in Table 12.5 below.

Table 12.5 Student Accommodation Objectives

Objective No.	Objective Detail	Development Compliance
HO O8a	Support the provision of high quality, professionally managed purpose built student accommodation either on campus, or in appropriate and accessible locations on public transport or cycle networks. All forms of student accommodation shall respect and protect the existing residential amenities of the area in which it is proposed.	The application site is easily accessible to third-level facilities identified including University of Limerick, Technological University Shannon (TUS), Mary Immaculate College (MIC) along with a number of Further and Higher Education campuses. The application site is situated some 1.6km from the existing TUS Campus in Moylish with in excess of 7,000 students; 1.9km from MIC with over 5,000 students; and 5km from the University of Limerick accommodating almost 18,000 students in the academic year 2023/2024.

	Student accommodation shall be of appropriate design, in accordance with the Department of Education and Science Guidelines on Residential Development for Third Level Students (1999), and (2005) and any subsequent updates. Applications for change of use from student housing to any other form of use shall be strongly resisted, without adequate demonstration that there is no longer a need for such use in the area and an over-provision of student housing exists.	The application site is located a 10 minute walk from Bus Service 304 which provides a 15 minute bus frequency to UL and which will increase under Bus Connects to a 10 minute frequency. Although of greater density and height relative to surrounding residential development, the proposed blocks are suitably located within an old Quarry and within an area of the city where taller buildings are promoted in accordance with the provisions of the Development Plan (Tables 12.4 & 12.5 refer). The building and its protruding wings are located a substantial distance (minimum 44.6m) from the houses in Clanmaurice Avenue. The development has been designed in excess of the minimum requirements set out in the Department of Education and Science Guidelines on Residential Development for Third Level Students (1999) and in excess of the most recently published Design Guidefor State Sponsored Student Accommodation 2025
HO O8b	Ensure that all applications for new off campus purpose built student accommodation, the change of use to student accommodation in existing residential areas, or extensions to existing dwellings to facilitate student accommodation, must include details outlining the presence and distribution of any permanent residential occupiers; the extent of students renting in the private housing market; and the presence of any other housing catering primarily for students and short term lets in the area/estate. The application should address any potential impacts of the proposal on residential amenity and any permanent residents in the area.	A Student Demand Assessment Report has been prepared by HRA Planning addressing the requirements in the Development Plan and detailing the extent and need of student accommodation in the area. The report highlights that there has been limited development of purpose-built student accommodation in Limerick City since the National Student Accommodation Strategy was published in 2017. In the time since the strategy was published, only 608 no. bed spaces have been constructed or granted planning permission. This has resulted in a shortfall of 2,374 bed spaces based on the 2024 demand projections for Limerick City, detailed in the Strategy. These figures highlight that there is a need to deliver more purpose built student accommodation in the city. An Operational Management Plan has been prepared to ensure that the PBSA can operate in harmony with existing residents thereby ensuring the residential amenity of the area can be protected.
HO O8c	Require all applications for off-campus purpose-built student accommodation to be accompanied by a Student	An Operational Student Accommodation Management Plan has been prepared, as part of an overall Management Plan for the

	Management Plan outlining how the scheme will be professionally managed. The Plan shall demonstrate how the development will be managed so as to avoid potential negative impacts from occupants on surrounding properties and neighbourhoods and ensure the maintenance of safe, secure and clean environments for the community, occupants and nearby residents.	application site and proposed development. The Plan commits to the appointment of a specialist Student Management Provider and a professional Management Service in the delivery and operation of the proposed development.
HO O8d	Ensure permissions for student accommodation will be subject to a condition requiring planning permission for a change of use to any other type of use, including short-term holiday letting. Future applications for this type of change of use will be resisted. Where it is demonstrated that such student accommodation is no longer required, a planning application will require details of a proper management plan for the non-student use of the units to prevent adverse impacts on traditional residential estates.	An Coimisiuin Pleanála should note that this application includes seeking permission for use of the accommodation, outside of student term time, for short-term letting purposes, as already justified in Section 7.8 of this report. The Operational Management Plan submitted with the application for approval provides measures for the non student use of the units.

Objective HO 02 promotes increased density in accordance with Table 2.6 Density Assumptions per Settlement Hierarchy in the Development Plan which have already been considered in this report.

Objective HO O3 recognises the need to ensure a balance between the protection of existing residential amenities, the established character of the area and the need to provide for sustainable new development. This matter has already been discussed extensively throughout this report under Building Height and Density. The proposed development has considered impacts on the residential amenities of these houses by reason of daylight and sunlight impacts as already discussed in Section 8.3of this report.

12.1.6 Environment, Heritage, Landscape & Green Infrastructure

The proposed development has been designed in order to avoid likely significant effect on areas of ecological importance. Where the potential for adverse effect on areas of ecological importance has been identified, mitigation will be implemented. The proposed project has been designed to avoid any effect on the wider environment including preventing the spread of invasive species, disturbance to protected species and loss/fragmentation of habitat.

Natural Heritage & Environment

Policy EH P1 and EH 01 seek to protect and conserve Limerick's natural heritage and biodiversity, in particular, areas designated as part of the European Sites Natura 2000 network. An Appropriate Assessment Screening Report and Natura Impact Statement was prepared by MKO as already detailed in Section 8.2 of this report.

Objective EH O3 requires all developments where there are species of conservation concern, to submit an ecological assessment of the effects of the development on the application site and nearby

designated sites. Biodiversity and ecological matters are addressed in Chapter 7.0 of the EIAR and this chapter provides details of alternative roosting or settlement facilities for species in accordance with the requirements of Objective EH 08. The incorporated landscape measures within the development will reinstate suitable resting and breeding spaces for the common garden birds recorded at the Masterplan site. Swift boxes will also be provided. Cement or woodcrete materials will be utilised to ensure durability of these nesting habitats.

An Invasive Species Management Plan has been submitted in compliance with Objective EH 01 which seeks to implement biosecurity measures, selected control measures and surveys and requires the submission of a control and management program for the invasive species on application site.

Objective EH O2 requires all developments in areas where there may be Lesser Horseshoe Bats, to submit an ecological assessment of the effects of the development on the species. Impacts on LHB were assessed as part of the EIAR as the species has been recorded on Masterplan site. A Baseline Bat Report is included as an Appendix to Chapter 7.0 of the EIAR and this informs the mitigation measures required on application site to facilitate Lesser Horseshoe Bats (LHB).

Following the clearance of the buildings and vegetation on the application site, there will be a temporary residual loss of commuting and foraging habitat availability for bat species. However, the most significant features on the application site, namely quarry walls and the reservoir, have been retained by design, and the landscape plan is designed to enhance the amount of green space on theapplication site, and provide new significant landscape features. The landscaping plan also includes the planting of tall vegetation leading into the application site from the west, thus potentially improving a commuting route into the site adjacent to the reservoir. The provision of alternative roosting habitat following construction has been incorporated into the design of the project and will include the use of bat boxes, bat poles and 3 no. bat houses.As such, with the implementation of mitigation measures outlined above, Chapter 7.0 of the EIAR concludes that there will be no significant residual effect on bats at any geographic scale as a result of this development and once the vegetation matures, there will be a likely enhancement of bat foraging habitat.

A derogation licence has been sought from the NPWS and a copy of the license application accompanies the proposed development, as detailed in Volume III of the EIAR, Appendix 7.4 The derogation licence, when secured, will be issued by theNPWS on a yearly basis, and therefore it is expected that multiple licences will be necessary as development advances on the application site.. Each licence will be informed by monitoring undertaken at the application site and will be specific to the works to be undertaken during the calendar year.

Objective EH O4 seeks the creation of new habitats by encouraging wild green areas and new water features such as, pools and ponds in new developments. A comprehensive landscaping scheme has been delivered including proposals for extensive SuDs measuers and utilization of the existing reservoir on site as detailed in Section 7.9 of this report. The proposal incorporates wildlife considerations in the retention/ protection/ management and reinforcement of natural features on site including provision of bird and bat boxes within the development post construction and retention of the natural features the comprise the quarry wall, all in accordance with Objective EH P2 which seeks to ensure the sustainable management and conservation of areas of natural environmental and geological value within Limerick.

Objective EH O14 seeks to increase the use of Nature Based Solutions (NBS) throughout Limerick. This objective is delivered throughout the development of Nature Based SuDs measures proposed and integrated throughout the development.

Objective EH O21 in relation to noise and vibration during construction and at Open Sites seeks to protect the quality of the environment. Chapter 13.0 of the EIAR, Noise & Vibration, details a number of mitigation measures during construction. The CEMP accompanying the development incorporates these measures to ensure appropriate noise levels are maintained during construction.

Archaeology & Built Heritage

Objective EH 036, EH 037 and EH 043 seek the preservation of all known sites and features of historical and archaeological interest, to include all the sites listed in the Record of Monuments and Places and to protect and preserve the preservation in situ of all sites and features of historical and archaeological interest, discovered subsequent to the publication of the Record of Monuments and Places. The Cleeves site itself is most strongly linked with industrial heritage, but because of its riverside location there is also potential for earlier remains beneath later construction layers. Field inspections and drone surveys did not identify archaeology on the surface within the Masterplan site, but the potential for subsurface archaeology remains. Overall, the archaeological impact assessment detailed in Chapter 8.0 of the EIAR concludes that the application site contains significant architectural heritage, from industrial remains to maritime heritage, all of which contribute to the identity of Limerick. It recommends mitigation measures including targeted excavation, preservation in situ, and careful architectural integration.

Given the significance of Cleeves in the context of industrial and architectural heritage, consideration is given to Objective EH 050 relating to works to protected structures. In this regard it should be noted that there are only two protected structures on the Masterplan site, including the Flaxmill Building and the Chimney with the curtilage / attendant grounds clearly defined as detailed in Figure 12.1. No works are proposed to the chimney. The sole works proposed to Flaxmill building comprises removal of the c20th rear lean-to. The upper storey and roof of the rear lean to will be demolished as part of the stabilisation and repair works to the Flaxmill undertaken as part of Phase I of the Masterplan. The remaining ground floor of the lean-to is to be demolished as part of the proposed development.

Chapter 9.0 of the EIAR provides a comprehensive assessment of the development with respect to its built heritage significance, whilst Chapter 12.0 considers the Landscape, including consideration of visual impact in the context of the protected structures on the application site. Further consideration is given to Objective EH 050 IN Table 12.6.

Figure 12.1 Plan of the Flaxmill complex as exists. Annotated extract from the appendix of the Statement of Significance. Red line infilled with a blue highlight indicates the curtilage of significance of the Main Mill and Chimney Stack.

Table 12.6 Objective EN 050 Work to Protected Structures	
Development Plan Standards	Development Evaluation
Protect structures included on the RPS from any works that would negatively impact their special character and appearance.	Save for removal of the lean to from the rear of the Flaxmill Building, there are no works proposed to the protected structures on the RPS. Phase I works, which are not included in this proposed development, does include works to facilitate the stabilization and repair of the Flaxmill (Phase I development)
Ensure that any development proposals to Protected Structures, their curtilage and setting, shall have regard to the Architectural Heritage Protection Guidelines for Planning Authorities published by the Department of the Arts, Heritage and the Gaeltacht.	The proposed development which includes removal; conservation and repair; retention and reuse; peeling back and redeveloping has regard to the Architectural Heritage Protection Guidelines for Planning Authorities published by the Department of the Arts, Heritage and the Gaeltacht. Refer to Section 7.2 of this report and Chaptr 9.0 Cultral Heritage Archaeology within the EIAR.

Ensure that all works are carried out under the supervision of a qualified professional with specialised conservation expertise.	James Sibson BA(Hons) Barch RIBA AABC is the lead Conservation Architect working on the Cleeves project since commencement in 2021. James has 20 years of experience working in the historic built environment. He is an Architect Accredited in Building Conservation who has led the repair and reuse of listed buildings and protected structures from pre- and post-industrial era. His work has guided major redevelopment projects in Manchester, Liverpool, Bristol and Huddersfield.
Ensure that any development, modification, alteration, or extension affecting a Protected Structure and/ or its setting, is sensitively sited and designed and is appropriate in terms of the proposed scale, mass, height, density, layout and materials.	The rhythm of the mill's façade has informed the designs for the new residential buildings, with stacked vertical apertures set to a repeating module horizontally. This gives the new residential buildings a mill like quality, both within the application site and when seen across the city. The design approach to materiality responds to and takes cues from the rich palette of materials and colours found in the existing Masterplan site and context, applying it to a contemporary residential context. With a focus on brick of varying colours creating a richly textured backdrop, each site proposal uses brick in combination with a secondary material. The patterning and configuration of facades express the differing new layer of residential uses across the application site, while taking cues from the rigorous industrial aesthetic of the Flaxmill and adjacent buildings, as do the treatment of gables as distinctive features. The existing roofscape at Cleeves incorporates various pitched roof configurations and barrel vaulted roofs of different scales reflecting different phases of development. Responding to this, similarly diverse roof profiles (pitches and barrel vaults) are proposed to be integrated into the existing roofscape in a new contemporary layer. Significant studies as already detailed in Section 7.2 of this report have been undertaken to inform the approach to development on the site, along with a comprehensive Visual Impact Assessment as detailed in Chapter 12.0 Landscape of the EIAR

Ensure that the form and structural integrity of the Protected Structure is retained in any redevelopment and that the relationship between the Protected Structure and any complex of adjoining buildings, designed landscape features, or views and vistas from within the grounds of the structure are respected.	The form and structural integrity of the protected structures are retained along with a number of other significant buildings and features on the application site. A Heritage Strategy has been developed based on detailed assessment and investigation of the historic building and phased development on the Masterplan site. This has guided the identification of character areas and strategies for peeling back and improving the aspects of the site that have diminished its special interest. The arrangement of buildings and massing on the residential sites are designed to create a network of connected public spaces that celebrate and enhance the site's industrial heritage. By linking distinct character areas into a cohesive whole, the design highlights and integrates key heritage landmarks— such as the Flaxmill, the iconic chimney, the reservoir, and the quarry edge—strengthening the application site's unique identity and sense of place.
Respect the special interest of the interior, including its plan form, hierarchy of spaces, architectural detail, fixtures and fittings and materials.	There are no proposals in the application for consent to alter or amend the interior of the existing protected structures / built heritage units. It is proposed to remove some structures, within the culrtilage of the protected structures and on adjacent sites. This is necessary to facilitate the proposed development. These structures are subject to detailed building recording with a record of salvage to inform retention and reuse of materials, components and features of interest.
Support the re-introduction of traditional features on protected structures where there is evidence that such features (e.g. window styles, finishes etc.) previously existed.	Not directly applicable to the proposed development. However, the Phase I works on the Flaxmill Building provides for the re-introduction of certain traditional features on the roof and at upper levels. Notably: - Cast iron parapet and valley gutter - Cast iron down pipes - Slate roof coverings - Repair and renewal of failed and missing trusses - Repair of structure - Repair and reinstatement of cornice - Reinstatement of water tank roof - Reinstatement of rear (northeast) window openings.
Ensure that new and adapted uses are compatible with the character and special interest of the Protected Structure.	Not directly applicable to this proposed development as the adaptive reuse of the Flaxmill building is not proposed until Phase III advances with the provision of a TUS Educational Campus. Retention and reuse of elements within the attendant grounds include the external walls of the former linen store and the transformation of the mill yard and reservoir

	for public access and use. Phase II will unlock the application sites potential and bring people into contact with the protected structures.
Protect the curtilage of Protected Structures and to refuse planning permission for inappropriate development within the curtilage and attendant grounds, that would adversely impact on the special character of the Protected Structure.	Whilst much of the development proposed falls within the defined curtilage of Cleeves, the Salesians zone and Shipyard Zone are located outside of the defined curtilage. Chapter 9.0 of the EIAR assesses the proposed development from a visual perspective and demonstrates how the development would not adversely impact the existing buildings of significance within the application site.
Protect and retain important elements of built heritage including historic gardens, stone walls, entrance gates and piers and any other associated curtilage features.	Where historic fabric is encountered the approach is to retain and reuse. The proposals have been developed around a Heritage Strategy that embodies the principles of 'avoid', 'minimise' and 'mitigate' A former cart entrance is to be reopened as the primary pedestrian entrance into the mill complex. Whilst elements of the Cleeves boundary wall are to be removed, the wall will remain a legible threshold. The existing wall at O'Callaghan Strand will be lowered to 450mm above ground level with total removal where there are entrance/building locations identified. This approach reconnects the application site with the river and facilitates connectivity and permeability in support of Objective CRQ 01, whist also ensuring legibility and an understanding of the past built form. Where interventions are proposed they are in locations of previous alterations. Salvage and reuse of features are addressed in the Architectural Design Report. It is intended that historic materials are to be retained and reused on the Masterplan site.
Ensure historic landscapes and gardens associated with Protected Structures are protected from inappropriate development.	There is no historic landscape or garden associated with Cleeves. However, the industrial complex, comprising the curtilage of the protected structures, has been carefully considered in the siting, design and juxtaposition of buildings.

12.1.7 Sustainable Mobility and Transport

Objective TR O2 supports the appropriate road design standards of all roads and streets within the urban areas, including suburbs, towns and villages within the 60km/h zone as per the Design Manual for Urban Roads and Streets. The scheme has been evaluated for compliance with DMURS and a DMURS Compliance Statement accompanies the proposed development. A Traffic & Transport Assessment has been prepared by ARUP.

Objective TR O6 promotes a modal shift away from the private car towards more sustainable modes of transport including walking, cycling, carpool and public transport in conjunction with the relevant transport authorities by making walking, cycling, carpool and public transport more attractive, appealing and accessible for all. The proposed development facilitates connectivity within and outside of the development, providing connections through to the North Circular Road and Condell Road. Further, in accordance with Objective TR O7 which continues to implement behavioural change initiatives and 'softer measures' aimed at enabling and promoting sustainable travel across Limerick, the development provides for a greater number of BIcycle parking facilities over and above that required in the Development Plan, with reduced car parking provision on the application site.

Parking and cycle standards have been provided in accordance with Objective TR 049 as already detailed in Section 7.10 of this report and detailed in Table 7.1.

The proposed development meets the Development Plan Policy TR P5 which seeks to implement the 10-minute city/town concept, promote compact growth and reduce the need for long distance travel. The proposed development site is located within the defined city centre surrounded by a road network with facilities and infrastructure for vulnerable road users and public transport users.

12.1.8 Water Infrastructure & Climate

The Limerick City and County Council Climate Action Plan 2024 - 2029 reinforces the commitment of the local government sector to lead on climate action at local and national levels, as reflected in the local government strategy In response to Climate Action at a national level, Limerick City & County Council recently adopted its Climate Action Plan 2024 – 2029. It identifies targets and proposals across a number of areas including Buildings & Energy; Transport; Environment; Flood Resilience; Circular Economy and Resource Management; and Community Engagement. The proposed development adopts these thematic measures and considers them across the design team adopting a Circular Economy, promoting active travel, promoting nature based SUDs solutions, promoting green and blue infrastructure and maintaining biodiversity on site. A Pre-Demolition Audit prepared by AtkinsRealis and a Circular Economy Statement prepared by ARUP accompany the proposed development, promoting the sustainable reuse and minimisation of demolition material from the application site.

Compliance with Objective IN O12 is considered in the ARUP Engineering Report accompanying the application as it deals with surface water management and SuDS throughout the Masterplan site, adopting a Nature Based Solution to such provision in accordance with the provisions of the Green and Blue Infrastructure Strategy for Limerick. In accordance with Objective CAF O6 the proposed development is designed to take account of the impacts of climate change including the installation of rainwater harvesting systems, sustainable urban drainage systems and nature-based solutions for water management.

Objective CAF 07 supporting Near Zero Energy Buildings is complied with promoted in the standard of building houses as detailed in the Energy Report that has been prepared by ARUP. The report outlines how the construction and performance of the proposed development will meet or exceed legislative and planning requirements, with particular emphasis on meeting the current Nearly Zero Energy Buildings standards. It also considers renewable energy sources in accordance with Objective CAF 08.

12.1.9 Sustainable Communities and Social Infrastructure

Objective SCSI O1 seeks to ensure new residential developments incorporate appropriate provision for community and recreational facilities, for the benefit of local residents. The application site, located within Limerick City Centre is well positioned to benefit from existing services and facilities as detailed in the Social Infrastructure Audit prepared by HRA Planning accompanying the proposed development. The proposed development provides for a creche facility capable of serving the proposed development and surrounding community and continues to facilitate community meanwhile uses pending the delivery of future phases of development within the Masterplan site. Adequate communal and public open space is also provided as previously discussed, with significant benefits attached in reconnecting the site with the river and the proposed Quarry Park. Future phases of the Masterplan for the site will provide for additional services and social infrastructure including a proposed TUS Educational Campus and the reuse of heritage buildings.

Objective SCSI O8 seeks to promote and develop place-making for the community developing and protecting an open space network and hierarchy of quality public and community spaces, to extend close to where people live. The proposed development contributes to this objective by providing for a linked network of open space areas and public realm within the development extending from the river, across the proposed Flaxmill Plaza and into the proposed Quarry Park. Within the proposed development all zones are connected to ensure the free movement of people within the Cleeves site and external to the public road network.

12.10 Development Management Standards

Whilst the previous paragraphs evaluate the proposed development against a number of policies and objectives in the Development Plan, there is also a need to consider a number of relevant development management standards provided in Chapter 11 of the Plan. The relevant standards have been extracted from the Development Plan as detailed in Table 12.7 and an evaluation of the proposed development provided.

Table 12.7 Development Management Standards Limerick Development Plan 2022 – 2028

Development Plan Standards	Development Evaluation
Section 11.1.2 - A Sustainability and Social Infrastructure Statement, which is an outline of the proposal's context and addresses how it responds to Plan objectives and surroundings, should be submitted	A Sustainability and Social Infrastructure Statement has been prepared and accompanies the proposed development.
Section 11.2.2 – Houses should be life adaptable to accommodate changing household sizes and a detailed breakdown of the unit type and size provided.	Table 7.1 of this report provides a breakdown of the units across the proposed development in accordance with the requirements in the development plan, whilst the Housing Quality Assessment prepared by the project Architects Architects provides a breakdown in the quantum of floorspace being provided.

Section 11.2.3 - Guidance for Residential density has been set out in Chapter 2: Core Strategy.	Density has already been considered in Section 11.3 of this report in full compliance with the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities 2024 and the Development Plan provisions.
Section 11.2.3 - A phasing schedule for any residential development exceeding 30 units, shall be submitted with a planning application.	A phasing schedule has been prepared which provides for the delivery of stages of delivery over a three year period as detailed in Section 7.12.1 of this report.
Section 11.3.4 – Adequate refuse, storage , recycling and composting areas shall be catered for.	An Operational Waste Management Plan prepared by AtkinsRealis accompanies the proposed development which has informed the extent and quantum of refuse provision on site, which is accommodated within the building blocks proposed.
Section 11.3.5 – Roads, footpaths, water services and landscaping requirements	Road and footpath design and construction are proposed in accordance with DMURS as detailed in the DMURS Compliance Statement accompanying the proposed development. A Confirmation of Feasibility has been received from Uisce Eireann. Surface water discharge is attenuated on the Masterplan site.
Section 11.3.6 – In accordance with the 2009 Sustainable Residential Guidelines and any subsequent guidelines, at a minimum, 15% of the gross greenfield sites should be provided as multifunctional open space in new residential developments easily accessible to all.	Although this standard is only applicable to a greenfield site, it should be noted that a total of 28% of the application site is dedicated as public realm and public open space, comprising 0.78 hectares of land.
Section 11.3.8 – Landscape design and maintenance plans are required to address a number of issues including biodiversity and nature based play, urban greening and specifications for materials	A Landscape & Public Realm Plan has been prepared. The existing quarry face is maintained and nature based drainage solutions are proposed. Specifications for materials are detailed on the landscaping plan.
Section 11.3.11 - All new developments will be required to manage and minimise surface water runoff by the use of Sustainable Drainage Systems (SuDS),	A comprehensive Storm Water Management Plan has been provided by ARUP. .
Section 11.3.12 – Noise and requirement for an Acoustic Design Statement where noise is identified as an issue.	Chapter 13.0 of the EIAR provides an Acoustic Assessment of the development having regard to the level of traffic noise in the area. Appropriate mitigation has been incorporated into the proposed development and will be implemented during construction.
Section 11.4.2 – An appropriate separation distance is advocated between residential units	Table 11.3 of this report details how the development complies with the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities 2024, with respect to separation distances of no less than 16m between residential units. In

	instances where separation distances of less than 16m are proposed, the residential units have no overlooking windows.
Section 11.4.2.3 – All habitable rooms within new residential units shall have access to appropriate levels of natural/daylight and be guided by the principles of Site Layout Planning for Daylight and Sunlight, A guide to good practice (Building Research Establishment Report, 2011) and/or any updated guidance. A daylight analysis will be required where considered necessary.	Section 8.3 of this report details with the daylight/sunlight assessment by IES An iterative design approach has been adopted to maximise the schemes performance. Chapter 17.0 of the EIAR details a full Daylight & Sunlight Assessment of the proposed development.
Section 11.4.4.7 - The Council will prioritise student accommodation on campus or within 1km distance from the boundary of a Third Level Institute, followed by locations within close proximity to high quality public transport corridors, cycle and pedestrian routes and green routes; The provision and location of student accommodation will not be permitted where it would have a detrimental effect on established residential amenities; The provision of on-site facilities, including storage facilities, waste management, quality and quantum of cycle parking and associated showers and lockers, leisure facilities, car parking and amenity areas The architectural quality of the design and integration with the wider streetscape with respect to scale, mass, external finishes and landscaping; The number of existing similar facilities in the area (applicable only to off campus accommodation). In assessing a proposal for student accommodation, the Planning Authority will consider the cumulative impact of student accommodation, which exists in the locality and will resist the overconcentration of such schemes in any one area, in the interests of sustainable planning	The application site is easily accessible to third-level facilities as detailed in Table 12.5. The application site is situated some 1.6km from the existing TUS Campus in Moylish with in excess of 7,000 students; 1.9km from MIC with over 5,000 students; and 5km from the University of Limerick accommodating almost 18,000 students in the academic year 2023/2024. The application site is located a 10 minute walk from Bus Service 304 which provides a 15 minute bus frequency to UL and which will increase under Bus Connects to a 10 minute frequency. Although of greater density and height relative to surrounding residential development, the proposed blocks are suitably located within an old Quarry and within an area of the city where taller buildings are promoted in accordance with the provisions of the Development Plan (Tables 12.4 & 12.5 refer). The building and its protruding wings are located a substantial distance (minimum 44.6m) from the houses in Clanmaurice Avenue. There are significant onsite facilities proposed as part of the development at ground floor including communal room, meeting room and laundry facilities. A Student Demand Assessment Report has been prepared by HRA Planning addressing the requirements in the Development Plan and detailing the extent and need of student accommodation in the area, as already detailed in Table 12.5

9.2 Limerick Climate Action Plan 2024 - 2029

The Limerick City and County Council Climate Action Plan 2024–2029 (LCCC, 2024) outlines the council's strategic approach to climate mitigation and adaptation, aiming to reduce greenhouse gas (GHG) emissions by 51% by 2030 (from a 2018 baseline) and to achieve climate neutrality by 2050. The plan is structured around a place-based approach, aligning with national and EU climate objectives, and is designed to support a just transition for communities across Limerick.

The plan is built on five key thematic areas:

- Buildings and Energy;
- Transport;
- Environment and Nature-Based Solutions;
- Flood Resilience and
- Circular Economy and Resource Management.

Strategic vison of LCC– "*A Green City Region on the Waterfront By 2030, Limerick will become a green City region on the Shannon Estuary connected through people and places. This will be achieved through engagement, innovation, resilient urban development and self-sustaining rural communities*".

The Council's Energy Management Team will lead efforts to reduce emissions from its own operations. Initiatives such as BusConnects Limerick and expanded cycling infrastructure are central to reducing transport-related emissions.The proposed development provides for significant bicycle parking facilities in excess of recommended standards in the Limerick Development Plan and the Sustainable Urban Housing Design Standards for New Apartments 2025 as detailed in Chapter 2.0 Table 2.2. in order to facilitate a modal shift and reduce emissions.

The Environment section promotes nature-based solutions, green infrastructure, and biodiversity enhancement. Actions include tree planting, habitat restoration, and the integration of green spaces into urban planning, all of which have been incorporated into the proposed development.

Flood Resilience is addressed through measures such as Sustainable Drainage Systems (SuDS), improved stormwater management, and alignment with the Catchment Flood Risk Assessment and Management (CFRAM) programme. These actions aim to reduce the impact of pluvial and fluvial flooding, which are identified as key risks for Limerick. These measures have influenced the approach to flood management on the application site and within the proposed development, as detailed in the Flood Risk Assessment Report prepared by ARUP and included in the application for consent under separate cover.

The Circular Economy and Resource Management theme focuses on waste reduction, sustainable procurement, and community-led environmental initiatives. The Council aims to embed circular economy principles across its operations and support local businesses and communities in doing the same. In advancing the proposed development, the Circular Economy and management of resources has been a key consideration as detailed in the Circular Economy Statement prepared by ARUP and included in the application for consent under separate cover. This is addressed further in this EIAR in Chapter 19.0 Waste Management.

The plan also includes a Climate Change Risk Assessment, which identifies key hazards for Limerick, including increased frequency of heavy rainfall, flooding, heatwaves, and droughts. Chapter 21.0 Risk Management for Major Accidents / Disasters considers key hazards for the proposed development.

The plan is supported by a robust implementation and monitoring framework, including Key Performance Indicators (KPIs), annual reporting, and alignment with national funding streams. Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) processes were undertaken to ensure environmental compliance.

The proposed development has been iteratively designed in compliance with the provisions, recommendations and strategies as provided in the Limerick Climate Action Plan 2024 – 2029.

10.0 CONCLUSION

The proposed development at the Cleeves Riverside Quarter represents a transformative opportunity for Limerick City, delivering a high-quality, mixed-use scheme that aligns with national, regional, and local planning policy objectives. The development has been carefully designed to respond to the unique characteristics of the application site, including its industrial heritage, riverside location, and strategic position within the city centre.

This Planning Statement has demonstrated that the proposed development is consistent with the principles of proper planning and sustainable development. It supports compact urban growth, promotes modal shift through sustainable transport infrastructure, and integrates nature-based solutions to enhance biodiversity and climate resilience. The proposal also addresses the urgent need for housing and student accommodation in Limerick, contributing meaningfully to national housing targets and urban regeneration goals.

The development has been informed by extensive consultation and engagement with stakeholders, statutory bodies, and the local community, ensuring that the final design reflects a balanced and inclusive approach. It incorporates best practice in urban design, conservation-led regeneration, and environmental management, and is supported by a comprehensive suite of technical assessments and reports.

In conclusion, the proposed development is a key component of the wider Cleeves Masterplan and the Limerick Twenty Thirty vision. It will deliver significant social, economic, and environmental benefits, revitalising a strategic brownfield site and contributing to the creation of a vibrant, sustainable, and resilient city centre.