

CLEEVES RIVERSIDE QUARTER DEVELOPMENT

Housing Mix Assessment

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



October 2025



CHARTERED TOWN PLANNING & ENVIRONMENT CONSULTANTS

Document Control Sheet

Title:	Housing Mix Assessment
Project:	20035 Cleeves Riverside Project/SIA
Prepared by:	Gary Rowan MRTPI MIPI <i>BSc Town & Regional Planning</i> <i>MSc Applied Science (Ecological Assessment)</i> <i>PG.Dip Environmental Impact Assessment (Mgmt.)</i>
	HRA Chartered Town Planning & Environment Consultants 3 Hartstonge Street Limerick T: +353 61 435000 E: info@hraplanning.ie W: www.hraplanning.ie
Date:	October 2025
Issue:	02

© Copyright HRA | PLANNING. All rights reserved. This report has been prepared for the exclusive use of the commissioning party and unless otherwise agreed in writing by HRA | Planning, no other party may copy, reproduce, distribute, make use of, or rely on the contents of the report. No liability is accepted by HRA | PLANNING for any use of this report, other than for the purposes for which it was originally prepared and provided. The opinions and information provided in this report are on the basis of HRA | PLANNING using due skill, care and diligence in the preparation of the same and no explicit warranty is provided as to their accuracy. It should be noted, and it is expressly stated that no independent verification of any of the documents or information supplied to HRA | PLANNING has been made.

Table of Contents

1.0	INTRODUCTION.....	3
1.1	Background.....	3
1.2	Context and Purpose	3
1.3	Report Structure	3
2.0	THE PROPOSED DEVELOPMENT	3
3.0	POLICY CONTEXT.....	6
3.1	National Policy Framework:	6
3.2	Regional Policy Framework:	7
3.3	Local Policy Framework:.....	7
3.4	National Planning Guidelines	9
3.5	Policy Summary:	10
4.0	ANALYSIS OF KEY CONSIDERATIONS.....	10
4.1	Demographic Dynamics.....	11
4.2	Location Dynamics	14
4.3	Market Availability.....	14
4.3	Considerations Summary.....	15
5.0	CONCLUSIONS.....	16

1.0 INTRODUCTION

1.1 Background

This report presents a statement of housing mix in respect to the residential component of the development proposed by Limerick City & County Council, in partnership with Limerick Twenty Thirty Strategic Development DAC as part of the Cleeves Riverside Quarter Development. This statement has been informed by and can be read in conjunction with the submitted plans and schedule of accommodation accompanying the planning application and which is also referenced in the separate Planning Statement Report.

1.2 Context and Purpose

Whilst there is no express requirement to provide a statement on housing mix, it is useful to do so to demonstrate the suitability and appropriateness of the proposed housing mix and tenure provision relative to the proposed location. This should be considered in light of the Housing Need Demands Assessment (HNDA) set out in the Limerick Development Plan 2022–2028 and the active pursuit in that Plan to facilitate 'housing mix' to meet the needs of all members of society. Such objectives aim to promote inclusive and diverse housing development across Limerick city by supporting varied housing types, encouraging apartment growth near urban hubs and transport, to meet current and future housing needs, including social and affordable housing.

1.3 Report Structure

Following this introduction, the structure of remainder of this statement is set out under three principal parts:

- The Proposed Development.
- Policy Context
- Analysis of Key Considerations
- Conclusions.

2.0 THE PROPOSED DEVELOPMENT

The application site lies within Limerick city centre, adjacent to the core retail and commercial area on the north side of the River Shannon. It is a brownfield site previously used for industrial purposes and still contains several older buildings. Vehicular and pedestrian access is available from O'Callaghan Strand and North Circular Road, with an additional pedestrian shortcut to Condell Road via the 'Riverside Walk' north of St. Michael's Rowing Club.

Under the Limerick Development Plan 2022–2028, the site is predominantly zoned 'City Centre,' with a smaller section at its northern edge zoned 'Existing Residential'. This central urban location benefits from excellent accessibility, with established road, pedestrian, and cycle infrastructure, and strong public transport links connecting it to the wider city and employment areas.

The proposed development forms part of an overall Masterplan approach prepared by the applicant (Limerick Twenty Thirty ["LTT"]) and published in 2023 setting out a coordinated and holistic approach to overall development on the Cleeves Site (5.30 hectares). The masterplan approach 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 and the delivery of compatible uses including, commercial, housing and educational use to this central site. Further details of the masterplan approach are set out in the accompanying Planning Statement and which has also been taken into consideration in the EIAR.

The proposed development (concentrating on the 'proposed residential element of development') is described as:

- 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 triplex 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.

For the purpose of this report, concentration is focused on the residential component of the proposed development. This excludes the proposed 'student housing' element as the consideration of 'housing mix' (in the context of housing tenure) does not include that form of housing. A Student Housing Needs

Assessment assessment is considered under separate reporting enclosed with this planning application. The main residential elements and their locations are described as follows:

- Salesians Zone:
 - » **146 no. apartments (76 no. 1 bed; and 70 no. 2 bed)**; a creche; undercroft car and bicycle parking; reception area, plant rooms, and refuse storage, with screened external plant at roof level;
 - » **20 no. 3 storey 3 bed triplex units**; and 30 no. car parking spaces for the dedicated use of the adjoining Salesians Primary School.
- Stonetown Terrace Zone:
 - » 1 no. building extending to 5 storeys comprising **38 no. apartments (12 no. 1 beds; 20 no. 2 beds; 6 studios)** with ancillary storage room, bicycle storage, plant rooms and refuse storage, with screened external plant at roof level; and
 - » **9 no. 3 storey 3 bed townhouses**
- 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 and plant; and 256qm of commercial ground floorspace intended to accommodate Class 1, Class 2 and / or Class 3 uses.

The proposed tenure composition is summarised in Table1 below. One and two-bed units (including studio units) comprise 87.4% provision of the residential component, with 3 bed units comprising 12.3%.

Tenure Composition	Unit Number	% of Scheme	Sub-totals
Studio	6	2.4%	215
1 bed apartment	97	41.4%	
2 bed apartment	102	43.5%	
3 bed townhouse and triplex Units	29	12.3%	29
TOTAL	234	100%	234

Table 1 Tenure Type and Composition

3.0 POLICY CONTEXT

The Housing policy context is set out in National, Regional and local Plans and strategies – each of which is considered briefly in respect to housing mix;

3.1 National Policy Framework:

'The National Planning Framework' (NPF) First Revision 2025

The Revised NPF details the Government's approach to facilitating and requiring a diverse housing mix is centred on delivering approximately 50,000 new homes annually to 2040 (National Policy Objective [NPO] 42 with a focus on high-quality, affordable, and well-located housing that supports

compact growth, sustainable development, and vibrant communities (NPOs 43–46). Together with ‘Housing for All’ (the Government’s Housing Plan for Ireland to 2030), the NPF prioritises choice in housing types, tenure, and location to meet the evolving needs of a growing, ageing, and increasingly diverse population. Key measures include incentivising the reuse of existing buildings, promoting higher residential densities in urban areas, integrating housing strategies across boundaries, and ensuring the provision of adaptable homes that can accommodate household changes over time.

The NPF references the Housing Need Demand Assessment (HNDA) as an analytical tool – prepared by each local authority to inform its Development Plan - as part of the evidence base approach to support and inform housing policies and implementation measures in redress to national housing pressures up to 2040, ensuring that future housing provision aligns with need and demand profiles across settlement types.

3.2 Regional Policy Framework:

Regional Spatial and Economic Strategy (RSES) for the Southern Region (2020)

The RSES is consistent with the NPF in terms of establishing a need to diversify housing mix and typologies within the (Southern) Region and, recognising the ‘HNDA as an evidence-based approach to be undertaken by each local authority in its consideration of future housing requirements.

The RSES recognises that the delivery of housing in Limerick is a central component of a broader transformation strategy set out under the Limerick-Shannon ‘Metropolitan Area Strategic Plan’ (MASP) contained within it that aims to create a vibrant living, retailing and working city through high quality, mixed use sustainable and transformative projects that emphasise density, regeneration, inclusivity, and innovation. Specifically, the MASP supports the densification of Limerick City Centre, the assembly of brownfield sites for development and City Centre rejuvenation and consolidation. The **RSES** references **Cleeves** in Limerick City as one of several key strategic urban redevelopment sites identified as part of the **Limerick 2030** vision, and the Cleeves Riverside Quarter as a major component of Limerick’s regeneration and economic transformation strategy.

3.3 Local Policy Framework:

The Limerick Development 2022-2028 (“LDP”)

The allocation of land and demand for housing for Limerick is set out in the ‘Core Strategy’ contained in the Limerick Development Plan which has been informed by the *Housing Needs Demand Assessment* (HNDA) which is appended to the Development Plan (in Volume 6).

This was informed in part by the predicted increased population targets set out under the NPF (first iteration) in 2018 and the Southern Regional Assembly RSES (January 2020) for the duration of the Development Plan period – i.e. up to 2028. Whilst this was based on (CSO) Census of Population data 2016, the most current 2022 census of population data has informed the most recent NPF ‘First Revision’ which seeks to provide for increased population which in turn, will inform reviews of the Limerick Development Plan in the near future.

In the meantime, the Core Strategy and HNDA predicts a housing demand/ requirement of +11,455 units for the Limerick City suburbs area (as defined by the CSO Limerick and Suburbs).

In terms of unit type, the HNDA analyses Rental Tenancy Board (RTB) data for the Limerick City and Suburbs area which indicates that demand in this area is for smaller unit sizes (1 and 2 bed units) in comparison with other areas of the County, which generally exhibit higher demand for larger unit sizes, indicative of family units. This clear contrast is also evident within the Limerick Municipal District, with the more urban 'City and Suburbs' indicating a higher number of smaller rental units than the remainder of the Municipal District which is more rural.

This tenure type demand, (illustrated in Table 4.27 of the HNDA), "*Household Size Cohort for Additional Anticipated Households in Limerick City*", sets out the year-by-year breakdown of predicted tenure requirements for Limerick City over the Development Plan period (2022–2028) and is set out in Table 1 below. For the purpose of this assessment, 2 additional columns are provided on the right-hand side of the table showing the total requirements across the plan period for those tenure types. These totals illustrate that one-person and two-person households clearly account for the predominant tenure demand throughout the period – accounting for circa 54% of housing requirement for the plan period.

Year	2022	2023	2024	2025	2026	2027	2028	Total No. 2022-2028	% Total 2022-2028
1 person household	248	495	494	494	493	492	246	2,962	25.8%
2 person household	275	547	544	541	538	535	266	3,246	28.3%
3 person household	168	333	330	328	326	323	161	1,969	17.1%
4 person household	158	319	323	326	330	334	169	1,959	17.1%
5+ person household	107	216	218	220	222	224	113	1,320	12.5%

Table: 1 Table 4.27 "Household Size Cohort for Additional Anticipated Households in Limerick City" extracted from the HNDA, with additional columns to the right added for this assessment

The HNDA indicates that urban regeneration and urban revitalisation will play a crucial role in delivering new homes in Limerick which it acknowledges is consistent with key priority in national, regional and local policy including the NPF and RSES as well as the Limerick 2030 plan which identified capacity for at least 1,000 new homes in the city centre.

Several Policy objectives are set out in the HNDA to inform the Limerick Housing Strategy up until 2028. This includes inter-alia;

PO3 To promote the efficient use of the existing housing stock in the City and County, through proactive measures including the promotion of private downsizing schemes to facilitate owner-occupiers who may wish to transfer to a Council/AHB-managed elderly housing scheme more suitable to their needs, and promoting the subdivision of existing larger dwellings into smaller ones in a manner consistent with planning policy to meet demand for 1 and 2 bedroom properties.

This analysis - transposed into the Limerick Development Plan 2022-2028 for the purpose of the Core Strategy - identifies an 'additional household forecast' for the 'City and Suburbs (in Limerick) including

Mungret and Annacotty' suburbs for the plan period of 11,442¹ - i.e. the spatial area defined by the 'City and Suburbs Boundary' stated on the Development Plan landuse Zoning Map.

The identification of increased housing tenure centrally within the city, and the specific pursuit of the smaller unit tenures identified and supported in the HNDA (including HNDA Policy PO3 referenced above), is supported and validated by the following policies and objectives contained in the written statement of the Development Plan;

"Policy HO P1

'Implementation of the Housing Strategy, including the Housing Need Demands Assessment'

It is a policy of the Council to facilitate the implementation and delivery of the Housing Strategy and Housing Need Demand Assessment (HNDA) 2022 – 2028, to meet the increasing projected population, changing household size and housing needs, including social and affordable housing requirements of Limerick over the lifetime of the Plan

"Objective HO O1

Social Inclusion"

It is an objective of the Council to ensure that new developments are socially inclusive and provide for a wide variety of housing types, sizes and tenure, in suitable locations, throughout Limerick, to cater for the demands established in the Housing Strategy and the Housing Need Demand Assessment."

"Objective HO O5 Apartments"

It is an objective of the Council to encourage an increase in the scale and extent of apartment development, particularly in proximity to core urban centres and other factors including existing public transport nodes, or locations where high frequency public transport can be provided, close to locations of employment and a range of urban amenities including parks/ waterfronts, shopping and other services"

3.4 National Planning Guidelines

3.4.1 The Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities 2024

Section 4.4 of these Guidelines sets out a number of; **'Key Indicators of Quality Design and Placemaking'** amongst which it states under the heading: **Mix and Distribution of Uses:**

'Promoting the integration of land uses and transportation and a diverse and innovative mix of housing that can facilitate compact housing and provide greater housing choice'.

This reference to 'housing mix' is expanded upon further under Section 4.4(II) of the Guidelines which states:

1 Limerick Development Plan 2022-2028 Core Strategy Table: Volume , Table 2.7 Settlement hierarchy, population and household growth up to end of Plan period Q2 2028 plus zoned land provision

- “(f) The creation of sustainable communities also **requires a diverse mix of housing** and variety in residential densities across settlements. This will require a focus on the delivery of innovative housing types that can **facilitate compact growth and provide greater housing choice that responds to the needs of single people, families, older people and people with disabilities, informed by a Housing Needs Demand Assessment (HNDA) where possible.** Development plans may specify a mix for apartment and other housing developments, but this should be further to an evidence-based Housing Needs and Demand Assessment”.*

3.4.2 Planning Design Standards for Apartments Guidelines for Planning Authorities, 2025

The Guidelines recognise that development plans can tailor housing provision to local needs, informed by housing strategies and projected demand, but note that some have imposed blanket unit-mix rules on apartment schemes. There are no such ‘blanket ban’ provisions in the Limerick Development Plan. Such requirements can harm viability and reduce the number of units delivered. **Specific Planning Policy Requirement 1 (‘SPPR’)** recommends that **Housing Need and Demand Assessments (HNDA) should guide housing mix**, considering deliverable densities and typologies and, except in specific cases, statutory plan restrictions on mix within apartment developments are not justified.

3.5 Policy Summary:

The policy framework for housing in Limerick is structured hierarchically, with national, regional, and local plans aligning to guide delivery. At the top, the National Planning Framework (NPF) First Revision sets the national direction, targeting 50,000 new homes annually to 2040 and requiring each local authority to prepare a HNDA to ensure provision matches demographic and spatial needs. The Regional Spatial and Economic Strategy (RSES) for the Southern Region translates this into a regional vision, emphasising diverse housing typologies, higher densities, brownfield regeneration, and strategic projects such as the Cleeves Riverside Quarter under the Limerick-Shannon MASP. At the local level, the Limerick Development Plan 2022–2028 uses its HNDA to identify a forecast need of +11,455 units for Limerick City and Suburbs by 2028, with market evidence showing a pronounced demand here for smaller unit sizes (1 and 2-bed) compared with the family-sized housing more typical in rural areas. This local strategy integrates specific policy objectives—such as PO3, promoting downsizing and subdivision of larger dwellings, and policies HO P1, HO O1, and HO O5, which collectively seek to deliver socially inclusive, mixed-tenure housing and expand apartment provision in well-connected urban locations—thus directing housing growth towards compact, smaller-unit, socially inclusive developments within the city’s core.

4.0 ANALYSIS OF KEY CONSIDERATIONS

As outlined in the previous section, the HNDA for Limerick is based on 2016 Census of Population data. The most recent Census (2022) provides updated figures on household provision in the Limerick area. This section examines housing provision within the **‘Castle C’ Electoral Division (ED)** and, also more broadly within the Limerick City & Suburbs area, using the latest data from the 2022 CSO Census of Population.

4.1 Demographic Dynamics

The **Castle C** electoral division (ED) as illustrated in Figure 1, extends to an area around the Cleeves site to the north and west, comprises a population of 1,429 persons and 546 no. household units.



Figure 1 Castle D ED. Insert, shown within the context of the Limerick City and Suburbs

The population of 'Castle C' ED is 1,429 persons. The breakdown of the population distribution by age group within this Electoral District which is illustrated in Figure 2 below demonstrates that the population is highest in the 30–34 and 35–39 age groups, with numbers gradually declining in older cohorts, while younger age groups under 20 show smaller but steady representation.

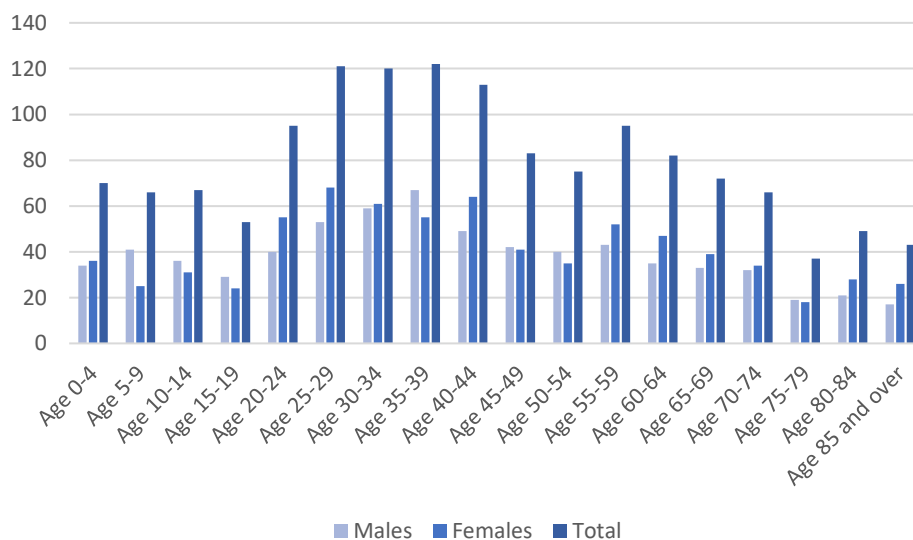


Figure 2 Age Group Cohort within the 'Castle C' Electoral District Source: Census of Population 2022)

Further in-depth analysis of this population dynamic, examined at the lowest possible Small Area Population Statistics ('SAP') level and within the immediate neighbourhood of the site—i.e. the 10-minute walk-time catchment used in the separate Social Infrastructure Assessment report (enclosed with the planning application)—is broadly consistent with the age cohort pattern shown in Figure 2. It shows a clear concentration in working-age young adult groups, with the largest populations in the 25–29 age group, followed by the 30–34 age group, and a decline in older cohorts thereafter.

In terms of family cycle (at the lowest 'SAP' level of analysis), over half (45% combined) of all families are either pre-family or adult households as shown in Figure 3 below.

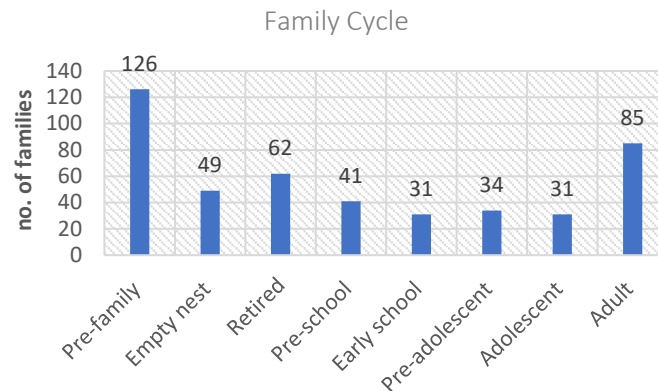


Figure 3 Family Cycle

4.2 Tenure Composition and Character

The composition of household unit tenure within **Castle D** ED in terms of room number per household and in comparison with the city and suburbs area is shown in Table 2.

Housing Tenure Analysis: 'Castle C' ED and in the Limerick City and Suburbs ³										
Bedrooms Per household ²	1 room	2 rooms	3 rooms	4 rooms	5 rooms	6 rooms	7 rooms	8 +rooms	Not Stated	TOTAL
No.	1	20	106	68	43	97	65	104	42	546
% of Castle ED	0.18	3.66	19.41	12.45	7.88	17.77	11.90	19.05	7.69	100%
% of Castle ED	3.85%		88.46%						7.69%	/
All City and Suburbs ³ (No.)	190	1,700	3,709	4,259	8,947	7,716	4,699	4,275	2,479	37,974
% of tenure in all City and Suburbs	1.7%		2.86%	7.15%				/		/

Table 2 Existing Unit Tenure Provision in the Castle C ED Area

² As recorded for the purpose of Census of Population 2022

³ As defined and calculated by CSO for Census of Population <https://visual.cso.ie/?body=entity/censusurbanprofiles>

Table 2 illustrates that only 3.85% of the household tenure composition within Castle C ED comprises one and two-bed units whilst the predominant tenure (88.46%) consists of 3+ bedroom households. The representation of one and two-bed units within Castle C ED represents only 1.7% of that tenure provision within the context of all City and Suburb area.

The above Tenure composition of 'Castle C' ED is illustrated further in Figure 4 below:

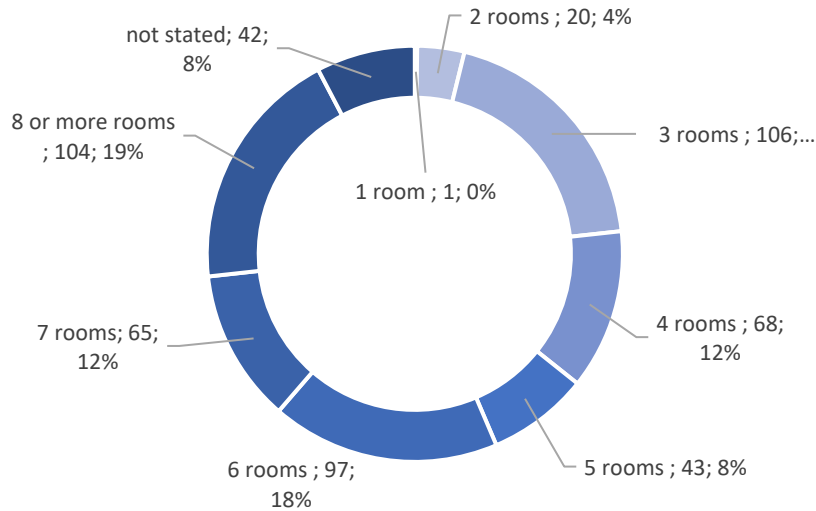


Figure 4 Tenure composition of 'Castle C' ED

The above Tenure composition of 'Castle C' ED in the context of the tenure composition of the Limerick City and Suburbs is illustrated below in Figure 5 indicating that the Castle C Ed presents a small proportion of households generally within the context of the city:

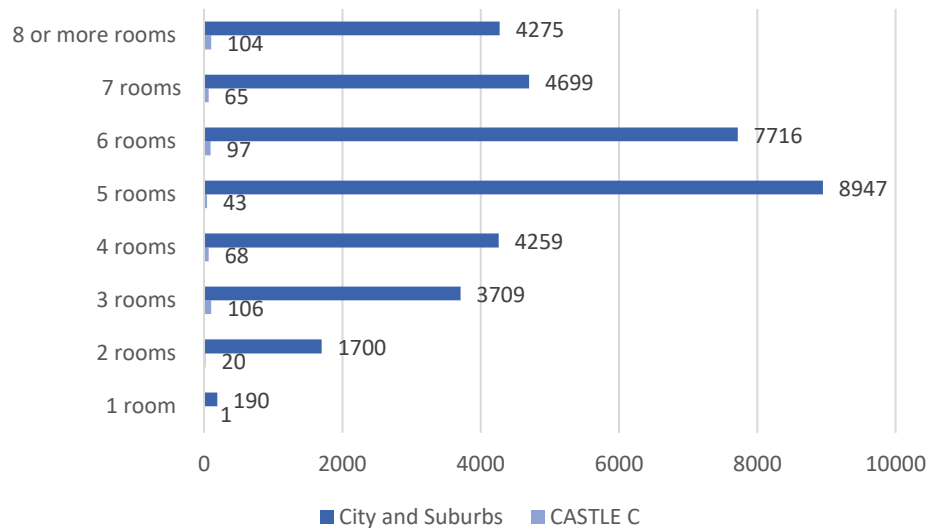


Figure 5 Tenure composition of 'Castle C' ED in the context of the tenure composition of the Limerick City and Suburbs

4.2 Location Dynamics

The proposed development is situated within a central and highly accessible area of Limerick City. The site benefits from strong transport connectivity, featuring five bus stops within a 500-meter radius that serve multiple key routes in both directions, providing easy access throughout Limerick's urban area as shown in Figure 6.

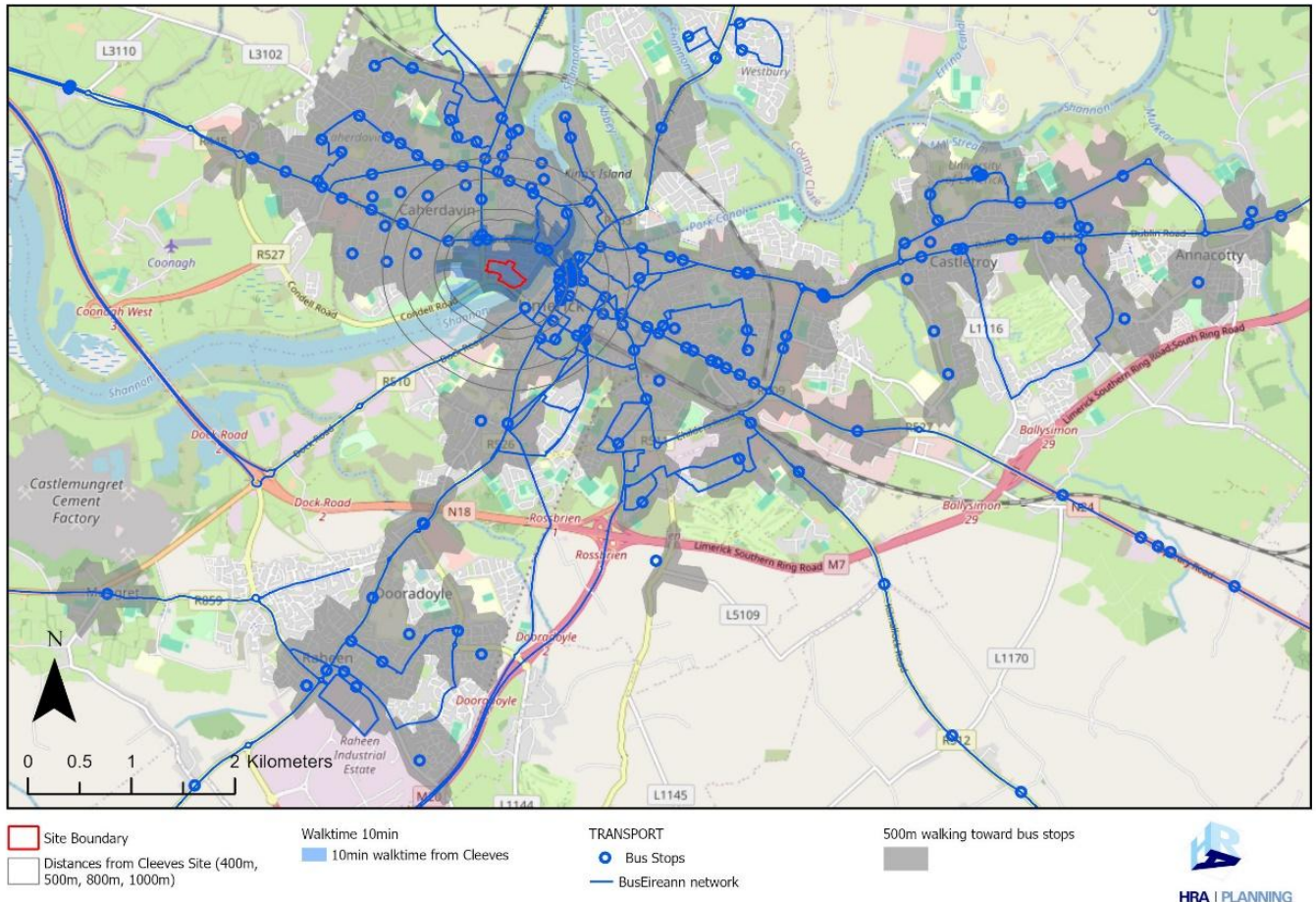


Figure 6.0 Extent of Urban bus network coverage and 500m walking proximity from those stops

These stops are conveniently located to the northwest at Union Cross junction and to the northeast near Sarsfield Bridge, within a short walking distance. Additionally, nearby Transport for Ireland (TfI) bike stations adjacent to Sarsfield Bridge offer alternative sustainable travel options. The site is also a 15-minute walk from Colbert Train Station, which provides direct rail connections to major cities including Dublin, Galway, and Waterford. Cycling infrastructure is being enhanced, with plans underway to make the temporary two-way cycle lane on Shannon Bridge permanent, ensuring a safe and continuous cycling route linking the neighbourhood north of the River Shannon to the city centre. This, combined with local road and pedestrian networks, supports a variety of sustainable and accessible transport modes for residents and visitors.

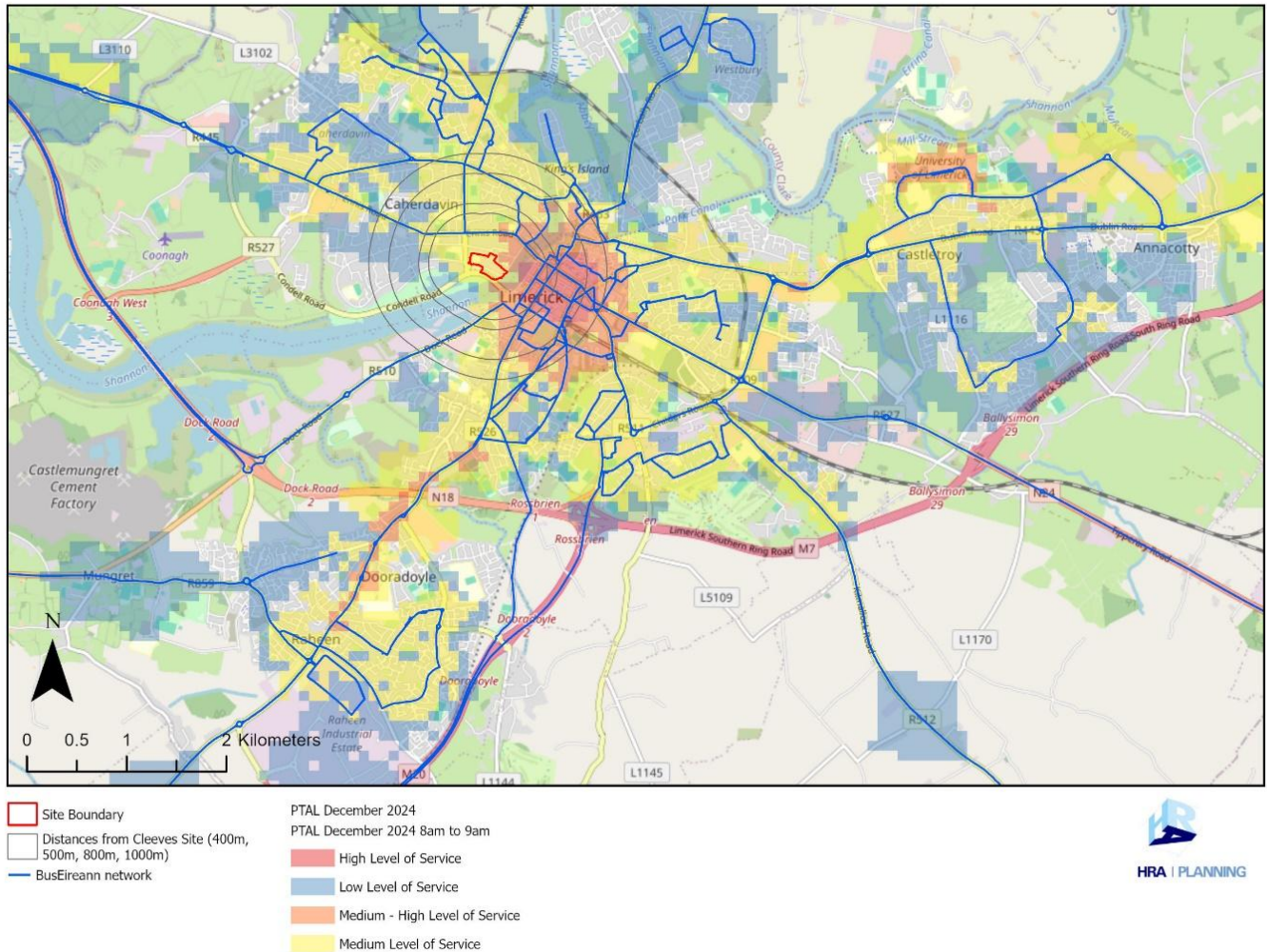


Figure 7: PTAL data and Analysis showing level of public transport provision and service access of the site in the city context (Source National Transport Authority) with analysis by HRA PLANNING.

The site has two land use zonings afforded to it in the Development Plan. Whilst most of the site is zoned for ‘City Centre’ mixed uses, Stonetown Terrace is largely zoned for ‘Existing Residential Use’ where that objective is “**to provide for residential development and to protect and improve existing residential amenity**”, the majority of the development site benefits from the ‘City Centre’ zoning where 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**”

4.3 Market Availability

Market analysis of the rental property market (from review of the ‘daft.ie’ property platform) shows that at the time of writing, only 27 No. one and 2-bed apartments for sale and 13 one and 2-bed units available for rent in Limerick City Centre (generally, within 1km of the Cleeves site).

4.4 Considerations Summary:

The following observations can be drawn from this analysis:

- **‘Castle C’ ED has a much lower proportion (and supply) of smaller units than the wider city**
 - » Only 0.18% of households have 1 room in Castle C ED compared with 1.7% citywide.
 - » Only 3.66% have 2 rooms compared to 4.47% citywide.
 - » This indicates an undersupply of small units locally relative to the broader housing market.
- **High proportion of larger dwellings in Castle C ED**
 - » Combined, 3+ room units account for over 96% of stock in Castle C ED, suggesting a housing mix skewed towards larger households.
 - » By contrast, smaller dwellings (1–2 rooms) make up just 3.84% with the Electoral District, far below levels needed to support single-person and couple households.
- **Demographic and market implications**
 - » Analysis of local (CSO ‘ED’ and ‘Small Area Population’) demographics in the context of the existing household tenure composition within ‘Castle C’ ED presents robust foundation to provide for small unit sizes.
 - » Demand for smaller units is likely to grow given national and local trends toward more one- and two-person households arising from revised NPF figures.
 - » Without more 1- and 2-room tenure, Castle C ED risks being less inclusive for students, young professionals, downsizers, and lower-income singles or couples.
- **Potential to improve housing choice and affordability**
 - » Increasing smaller units could address affordability issues, meet HNDA targets for diverse household needs, and support compact, sustainable urban growth
 - » Appropriateness of Cleeves as a location for higher density residential development within the city centre in terms of accessibility and connectivity as supported in local and regional policy through the Development Plan and the Regional Spatial and Economic Strategy for the Southern Region.
 - » Limited market supply of rental and opportunities to purchase smaller units within Limerick City centre area.

5.0 CONCLUSIONS

It is essential that the supply of new homes is carefully aligned with local demand to avoid unsuitable housing types and inefficient land use. This principle is reinforced by national policy, which requires local planning authorities to prepare a Housing Need and Demand Assessment (HNDA) to inform housing supply decisions, as set out in SPPR 1 of the Planning Design Standards for Apartments – Guidelines for Planning Authorities (2025). These standards guide housing mix, densities, and typologies that can be viably delivered.

The HNDA within the Limerick Development Plan 2022–2028 has been a key consideration in this proposal. While the scheme includes some three-bedroom units to ensure housing mix and tenure diversity, its primary focus is the provision of one- and two-bedroom apartments (including studio), which account for approximately 87.4% of the total housing proposed. This approach reflects the HNDA's identified need for increased provision of smaller units to meet forecast growth in one- and two-person households over the Plan period.

The proposal is fully consistent with the national, regional, and local housing policy framework, all of which promote diverse, higher-density housing in well-connected urban locations. Local HNDA evidence confirms a growing population and a pronounced demand for smaller units—findings that align with the demographic profile of the 'Castle C' Electoral Division, its immediate neighbourhood, and the wider Limerick City & Suburbs area, as recorded in the 2022 Census and in forecasts for urban growth.

In accordance with Policy Objective PO3 of the Limerick Development Plan, the proposal supports a broad mix of housing types, sizes, and tenures. It also advances the aims of Policy HO P1, Objective HO O1, and Objective HO O5 to expand apartment provision in core urban centres, near public transport nodes, and within walking distance of key services. The site's location within 500m of high-frequency public transport provides direct access to major employment centres both within the city centre and in suburban hubs such as Annacotty and Raheen. By meeting these objectives, the scheme directly supports the Council's goal of delivering compact, socially inclusive housing.

Analysis of local tenure composition highlights a predominance of larger (3+ bed) units and a significant young adult, pre-family demographic. The proposed tenure mix—predominantly, though not exclusively, one- and two-bedroom apartments—will help address this imbalance, providing housing that better meets the needs of this established cohort. This is consistent with the site's 'City Centre' and 'Existing Residential' zoning, which seek to consolidate Limerick City Centre through appropriate residential development and increased urban density.