

CLEEVES RIVERSIDE QUARTER DEVELOPMENT

Student Accommodation Demand and Concentration Report

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



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1.0 INTRODUCTION

This Student Accommodation Demand and Concentration Report has been prepared 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 Purpose Built Student Accommodation (PBSA) comprising 270 no. student bedspaces, along with 234 no. residential units, commercial floorspace, a creche and extensive public realm works, including the provision of a Plaza and recreational zone.

The purpose of this report is to consider and assess whether there is sufficient demand in the area to justify the proposed PBSA development and to ensure that the proposed development will not result in an oversupply of student accommodation in the Limerick Metropolitan Area. Whilst the proposed Phase III of the overall Masterplan (TUS development) is of relevance to the proposed PBSA development insofar that it will provide educational facilities within the Masterplan site, this assessment does not rely on its delivery.

2.0 SITE CONTEXT

The proposed development ('Cleeves') 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 1.0. The site is an urban brownfield site – previously development 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 shortcut to Condell Road via the 'Riverside Walk' to the north of St. Michael's Rowing club.

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 2.0 to demonstrate its proximity and relationship to the wider central 'city centre' urban area.

The 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 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 Cleeves site is well connected to the surrounding neighbourhood, the 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 (500m), 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. The Public Transport Accessibility

Level (PTAL) analysis for morning peak hours demonstrates that Cleeves is located in an area with a high level of public transport service. This indicates the potential for strong integration with the wider public transport network, supporting best practice land use and transport planning objectives. The site's connectivity and multimodal accessibility make it highly suitable for redevelopment and densification with new residential land use, aligning with sustainable urban consolidation policies and integrated land use-transport strategies

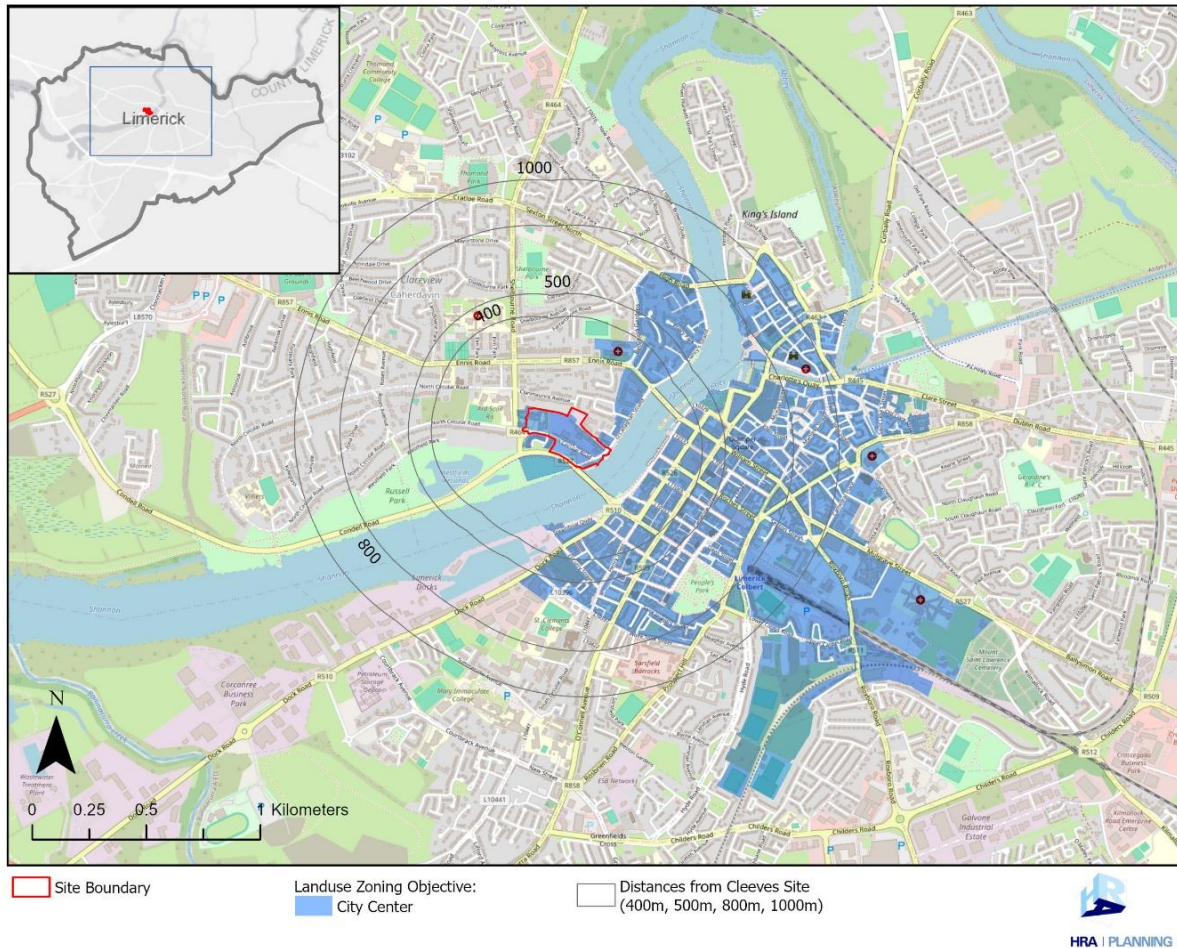


Figure 1.0 Site Location & Context - (above) site location in the context of its position within the City and Suburbs boundary (top left insert map) and Within the defined 'City Centre' area (main map) using the City Centre 'landuse zoning objective' (Limerick Development Plan 2022-2028 extract shown in top right corner)

3.0 PROPOSED DEVELOPMENT

3.1 Development Description

As described in the planning application, the proposed development comprises Phase II, of an overall Masterplan. Phase II is subsequent to ongoing stabilisation and repair of the Flaxmill protected structure (Phase I). Phase III is intended to comprise an educational campus, inclusive of the adaptive reuse of the Flaxmill Building as part of that development and will be subject to a future separate application. Phase IV comprising the Shipyard site will be the final phase of development.

Whilst a full project description of development is stated in the public notice an abbreviated description of development is set out below;

“The proposed development seeks A. Demolition of a number of structures to facilitate development and B. Construction and phased delivery of (i) buildings within the site ranging in height from 3 – 7 stories (with screened plant at roof level) including (a) 234 no. residential units; (b) 270 no. student bedspaces (PBSA) with ancillary resident services at ground floor level; (c) 299sqm of commercial floorspace; and (d) a creche; (ii) extensive public realm works, riverside canopy and heritage interpretative panels (iv) 3 no. dedicated bat houses; (v) Mobility Hub with canopy; and (vi) 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 measures; (c) raising the level of North Circular Road; (d) car and bicycle parking; (e) public lighting (f) telecommunication antennae; and (g) all landscaping works. Consent is also sought for use of the PBSA accommodation, outside of student term time, for short-term letting purposes.

With respect to the proposed PBSA development consent is sought for 1 no. Purpose Built Student Accommodation 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 at roof level. Consent is also sought for use of the PBSA accommodation, outside of student term time, for short-term letting purposes.

3.2 TUS Educational Campus – Stage III Masterplan Development

The Cleaves Riverside Quarter Illustrative Masterplan – Vision Document was published in October 2023 by Limerick Twenty Thirty (LTT). The non-statutory Masterplan provides for the comprehensive regeneration and development of the entire 5.3 hectares site including demolition, repair and reuse of all buildings on site. There are four proposed phases of development on the Masterplan Site. Whilst the Phase III of the Masterplan (TUS development) is of relevance to the proposed PBSA development insofar that it will provide educational facilities within the Masterplan site, this assessment does not rely on its delivery. This will form a separate planning application and is likely to advance whilst the Phase II Residential & Public Realm development (proposed development) is being assessed.

LTT and the Technological University of the Shannon (TUS) have entered into a Memorandum of Understanding to deliver the campus with a detailed Feasibility Study already complete. The next stage in the process is detailed design and it is likely that consent shall be sought for this development in Q2 2026, dependent on funding approval from the Higher Education Authority.

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 2.0.

The ground floor of the Flaxmill Building will accommodate circa 1,000sqm of commercial floorspace intended to activate the ground floor frontage 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 detailed design and it is likely that consent shall be sought for this development in Q2 2026, dependent on funding approval from the Higher Education Authority.



Figure 3.0 Proposed TUS development – Feasibility Stage

4.0 METHODOLOGY

Whilst the Limerick Development Plan 2022 - 2028 (LDP) does not provide a methodological approach to guide the preparation of a Student Accommodation Demand and Concentration Assessment Report, there are a number of pertinent objectives to consider in the preparation of an assessment.

Objective H0 08 of the LDP seeks to

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.

Section 11.4.4.7 of the LDP also states that when assessing applications for student accommodation, the Council will have regard to:

The location of student accommodation: 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 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 development and residential amenity.

Whilst HO 08 of the LDP requires details of permanent residential occupiers and the extent of students renting in the private housing market, there is no available data to provide such information. The Census of Population can only provide information on the permanent private households by type of occupancy detailing the number of units rented from a private landlord or those premises owned outright or subject to a mortgage. No information is provided on student rental numbers.

In full acknowledgement of the fact that residential units in the city centre are likely to be rented by students from private landlords, this report focuses on the existing and proposed provision of purpose built student accommodation in Limerick city, proximate to the site. This report will demonstrate the demand for purpose built student accommodation within Limerick City and consider the concentration of existing and proposed facilities in relation to the application site.

The following points will be considered throughout this report:

1. National policy objectives and demand calculations for the provision of student accommodation
2. Estimated demand and supply of student accommodation in Limerick City
3. Estimated supply and demand of student accommodation within the vicinity of the site; and
4. Conclusion regarding the concentration of student accommodation in the local area as a result of the proposed development.

The methodology used to assess the potential impact of the proposed development has been developed based on an analysis of recent applications for PBSA developments throughout the country. In the absence of any defined study distance, a 1km distance (10 minute walk time from the site) was chosen to analyse the estimated supply and demand of student accommodation within the vicinity of the site. This was chosen having regard to the 10 minute neighbourhood concept and the distance that people are willing to walk to avail of services. This review has found that An Coimisiún Pleanála has considered a 1km study area around an application site appropriate when assessing student bedspace demand and concentration. Thus, the CSO 2022 Small Areas (SA) within a 1km radius of the application site were identified, which form the study area for this assessment.

5.0 NATIONAL POLICY & OUTLOOK FOR STUDENT ACCOMMODATION

5.1 Revised National Planning Framework

The Revised National Planning Framework (NPF) recognises that the demand for student accommodation in urban areas can further exacerbate demand for rental accommodation in urban areas. The NPF outlines that in the years ahead, student accommodation pressures are anticipated to increase. The location of purpose-built student accommodation needs to be as proximate as possible to the centre of education, as well as being connected to accessible infrastructure such as walking, cycling and public transport.

Importantly, the NPF recognises that student accommodation also contributes to the financial, cultural and social fabric of regions, cities and towns. It highlights that *“the adaptive reuse of existing buildings and brownfield sites for student accommodation can assist with the reduction of vacancy and dereliction, thereby promoting vitality and vibrancy in settlements, in support of Town Centre First principles. The National Student Accommodation Strategy supports these objectives”*.

The NPF also acknowledges the demand for student accommodation. It recognizes 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.

In the context of the development proposal, 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”*.

Acknowledging the role which the further and higher education systems can play in catalysing and supporting economic and social development in local communities, in regions and nationally is recognised, the NPF seeks *“to invest in student accommodation within our universities”*.

5.2 Housing for All – A New Housing Plan for Ireland

Housing for All, led by the Minister for Housing, Local Government and Heritage sets out a series of actions which will be delivered to address the housing crisis. The plan was backed by the largest ever housing budget in the history of the State, in excess of €20bn, to transform the housing system. This investment has recently been superseded by a commitment in the National Development Plan pledging investment of €36bn.

Housing For All contains a commitment to support technological universities to develop purpose-built student accommodation where such a requirement exists, through access to appropriate financing. It contains the following actions relating to Student Accommodation:

- Action 2.2 - Develop policy and methodology for potential long-term state support for the construction of Purpose-Built Student Accommodation to provide additionality for targeted cohorts.

- Action 11.5 - Bring forward a range of potential options for state support to assist activation of additional new purpose-built student accommodation units.
- Action 11.6 - Develop policy and methodology for potential short-term state support for proposals for the construction of Purpose-Built Student Accommodation (PBSA) by Higher Education Institutions to provide additionality for targeted cohorts where planning permission has already been secured. This includes the examination of relevant EU rules together with a borrowing framework and financing options for Technology Universities.

5.3 Regional Spatial and Economic Strategy for the Southern Region 2020 - 2032

The Regional Spatial and Economic Strategy (RSES) for the Southern Region 2020–2032 (RSES) outlines a strategic framework for balanced and sustainable development across the Southern Region of Ireland. Regarding student accommodation, the RSES recognises the importance of third-level institutions (such as universities and institutes of technology) as drivers of regional development. It supports investment in infrastructure that enhances the attractiveness and capacity of these institutions, including student housing (RPO 32)

Student accommodation is encouraged as part of compact urban growth strategies, particularly in metropolitan areas like Cork, Limerick-Shannon, and Waterford. The RSES promotes the development of purpose-built student accommodation (PBSA) in proximity to campuses and within city centres to reduce commuting, support vibrant urban cores, and alleviate pressure on the general housing market (RPO 33).

The provision of student accommodation is very much promoted as part of integrated planning for education and housing. Collaboration between local authorities, higher education institutions, and private developers to ensure adequate supply (RPO 34) is advocated within the context of available transport, infrastructure and community services (RPO 35).

5.4 Limerick Development Plan 2022 - 2028

The Limerick Development Plan 2022-2028 (LDP) is the statutory document guiding development in the area. The LDP supports the provision of high quality professionally managed student accommodation in accordance with Objective HO 08(a):

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. 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.

In compliance with the above objective, it is noted that the 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 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 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 (Refer to Planning Statement 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 Guide for State Sponsored Student Accommodation 2025

5.5 National Student Accommodation Strategy

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 per cent 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 campus¹. 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 bedspaces². 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.

A recent Question & Answers session in the Dail (06th February 2025) confirmed that since 2017 to the end of December 2024, 15,779 purpose-built student beds have been built, bringing the total stock of student beds to over 48,000 beds. This represents over a doubling of student bedspaces since Q3 2019, with an acknowledgement that there remains an undersupply of student bedspaces in the country.

It is acknowledged in national policy that there is a shortage of student accommodation, in the context of the wider housing crisis, with the result that there is a need to increase the supply of all types of housing and accommodation, including student accommodation.

5.6 HEA Student Accommodation Report: Demand And Supply

In 2019 the Higher Education Authority (HEA) found that there will be an unmet demand nationally of 25,182 student bed spaces by 2024, which will have a direct impact on the private rental sector (Figure 4.0). The report highlights that this will primarily be seen around Higher Education Institutes (HEIs) in the cities

The report concludes that “on campus” student accommodation will be essential to addressing this. A key recommendation of the report is that there is “continued flexibility by local authorities on application of guidelines for the specification of student accommodation”.

¹ National Student Accommodation Strategy pp15

² Quarter 3 2019 Progress Report on the National Student Accommodation Strategy pp 1

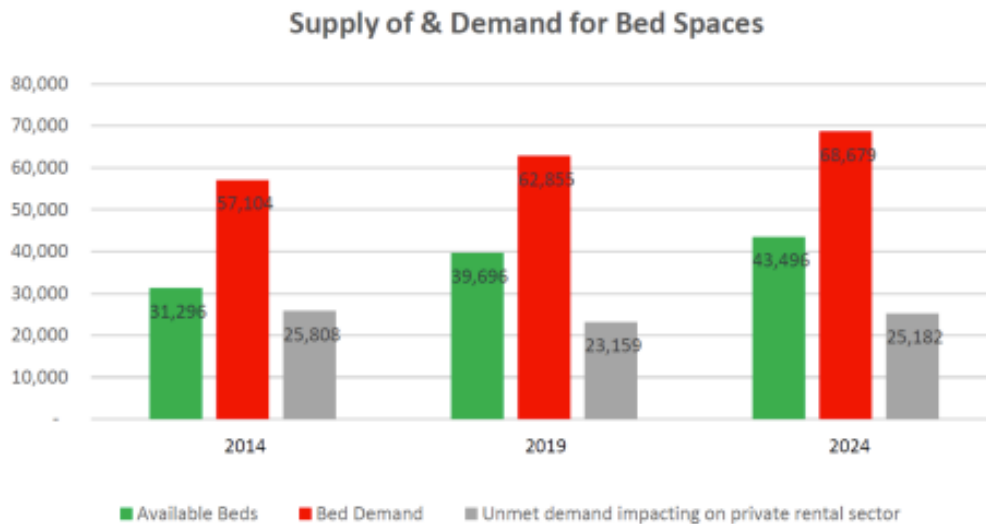


Figure 4.0 Source HEA Report on Student Accommodation: Demand and Supply

5.7 Ireland Student Housing Market

An Ireland Student Housing Market Report was recently published by Knight Frank in April 2025. The report confirms that there has been a 21per cent increase in student numbers at Irish Universities and Colleges since 2014. Demand is being driven by both Irish and international students with the international component set to become increasingly important. Ireland now boasts eight Universities, and new legislation in 2018 has allowed for the establishment of a further five new Technological Universities (TUS in Limerick). These, combined with Institutes of Technology, Colleges of Education, constituent Colleges, private Colleges, and Further Education Colleges, allows for a broad range of choices for perspective students in terms of qualifications, education fields and location throughout Ireland.

The report concludes that based on CSO projections, the 20-24 population cohort is forecast to increase by 35,300 (11.5 per cent) to 342,400 in 2026 and grow to 387,000 by 2036. Further, some 47 per cent of all international students in 2023/2024 came from Asia, with India the leading country within that category. 25per cent came from Europe & the UK and 22per cent from North America³.

Statistics from the HEA confirms that total enrolments in higher education have increased 14.8% between 2017/18 and 2023/24 – up from circa 231,710 to circa 265,905⁴.

³ *Ireland Student Housing Market, Knight Frank 2025*

⁴ <https://hea.ie/statistics/>

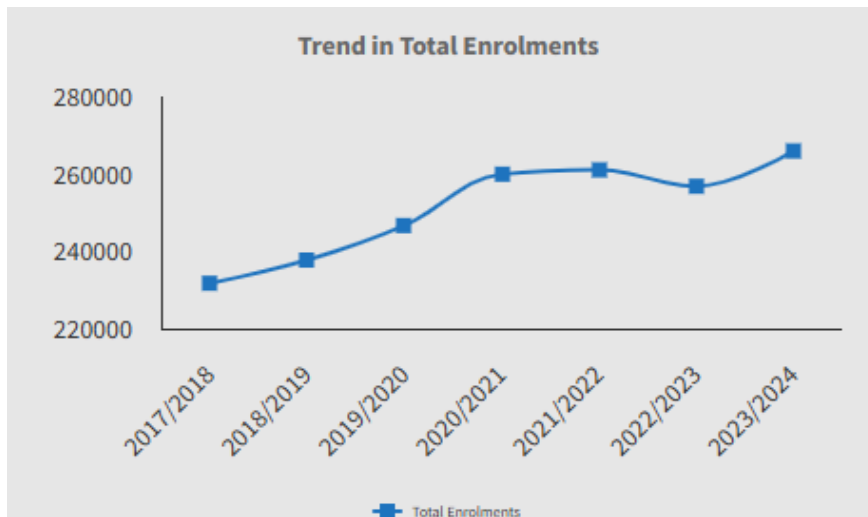


Figure 5.0 Source: Higher Education Authority Website - Statistics

5.8 Summation

This all points to increased demand for student accommodation across the country. In November 2022, the Government agreed to support the development of long-term evidence-based policy to stimulate the optimum supply of student accommodation. DFHERIS and the HEA also propose to develop data on university owned and private student accommodation by region, to analyse demand levels and develop future policy and responses. A new Student Accommodation Strategy is due to be published by DFHERIS this year (2025).

6.0 STUDENT CONCENTRATION

6.1 The Location

As referenced in Section 4.0 of this report, Section 11.4.4.7 of the LDP states that:

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;" (Underline Our Emphasis)

The application site is located outside of the notional 1km radius identified in the Development Plan as being 'prioritised' for the provision of student accommodation. However, the site is located within the defined city centre of Limerick, with access to public transport, pedestrian and cycle routes. As noted in national policy documents referenced in Section 5.0 above (NPF) student accommodation contributes to the financial, cultural and social fabric of cities. It can assist with the reduction of vacancy and dereliction, thereby promoting vitality and vibrancy in settlements, in support of Town Centre First principles. The National Student Accommodation Strategy supports these objectives.

The site is easily accessible to third-level facilities including University of Limerick, Technological University Shannon (TUS), Mary Immaculate College (MIC) along with a number of Further and Higher

Education campuses. The site is situated some 1.6km from the existing TUS Campus in Moylish; 1.9km from MIC; and 5km from UL.

Cognisance must be had to the Masterplan proposal for the Cleaves site, and in particular the proposed Phase III development, which will provide for a new TUS Campus on the Cleaves site. There is a Memorandum of Understanding between Limerick Twenty Thirty and TUS to deliver the campus, accommodating Business & Marketing Departments and the Creative Arts. The PBSA development is scheduled for the last phase of delivery within the proposed development and is likely to be delivered in tandem with the proposed TUS Campus, subject to securing planning consent.

Thus, whilst the proposed PBSA development may not be located within 1km of an existing third level institution, it is anticipated that the proposed development will be situated neighbouring the proposed new TUS Campus. Further, the proposal is appropriately located on a brownfield, vacant site in need of regeneration, situated in Limerick City Centre, all in accordance with national policy.

Irrespective to the proposed location of a TUS Campus on the application site as part of Phase III of the Masterplan, the application site being equidistant between both TUS Limerick and MIC campuses, and its location adjacent to existing public transport routes, means it is ideally suited to address the undersupply of PBSA serving Universities in Limerick..

6.2 Existing Concentration

If one examines the population within a 1km radius⁵ of the site, the area had a population of 23,950 persons in 2022. Of that population, only 2,216 persons over the age of 15 years are in full time education. This represents 9.2 per cent of the total population within 1km of the site.

It is noted that this percentage also takes account of people aged between 15-18, an age group who will typically be living within their family home, who are also still attending secondary level education. However, this metric is still an effective indicator as to the level of students living in the study area.

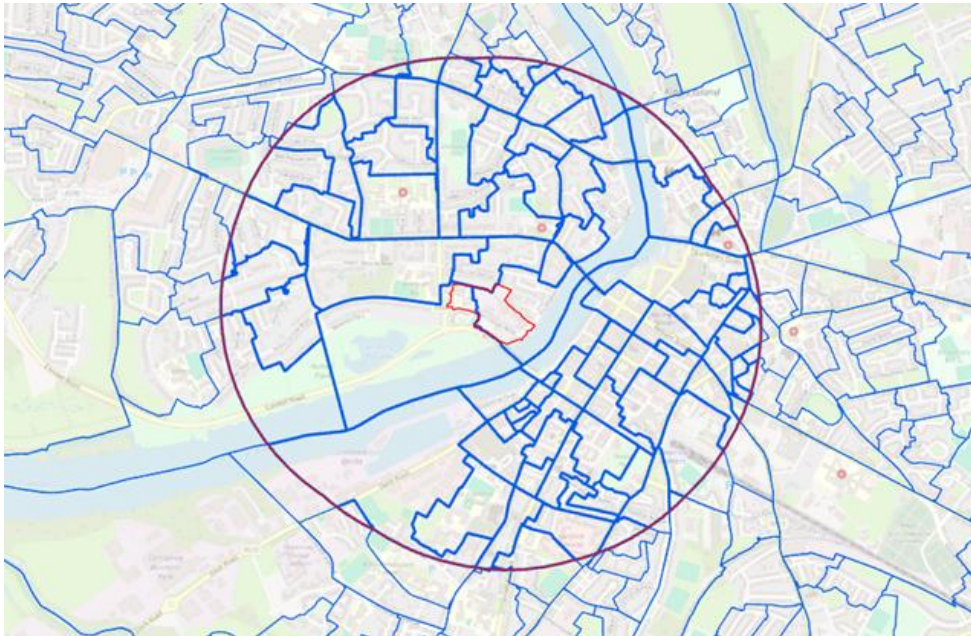
Whilst there is no indicator / threshold of acceptability in Ireland, Edinburgh City Council's Student Housing Guidance is considered to be best practice in terms of providing the appropriate concentration levels of student accommodation in terms of maintaining the social and physical fabric of a given area. This guidance document indicates that:

Where the student population is dominant, exceeding 50 per cent of the population, there will be a greater potential imbalance within the community".

As there is no equivalent document for Limerick, it is proposed to reference this as an appropriate threshold in the assessment of the proposed student accommodation scheme.

Figure 6.0 1km distance from Cleaves Site with Small Area Population (SAP) areas shown in blue

⁵ Spatial analysis of extrapolated data from Census of Population 2022



As the Census of Population 2022 provides information on residents living in the area on Census night, it can be confidently stated that 9.2% of the resident population within 1km of the site were students. What is unclear from this information is whether students are residing in the family home or whether they are renting whilst attending third level education. Irrespective, the data provides an indication of the ratio of student population to the resident population.

The delivery of the proposed development will result in an additional 270 no. students living in the study area. If this quantum is added to the existing student numbers residing in the catchment area, this would increase the percentage of students living within 1km of the site from 9.2 per cent to 10.2 per cent which is within the acceptability threshold established as per Edinburgh City Council's Student Housing Guidance.

7.0 SUPPLY AND DEMAND OF STUDENT ACCOMODATION IN LIMERICK

7.1 Increasing Enrolments Within Higher Education Institutes (HEI)

Between the academic years 2019/20 and 2023/24, as detailed in Figure 7.0, the University of Limerick (UL) recorded a substantial increase in student enrolment, rising by approximately 11%—equivalent to an additional 1,785 students. The Technological University of the Shannon (TUS), Limerick campus, also experienced growth during this period, with a total increase of 2.3%. Notably, TUS's enrolment figures closely mirrored UL's trajectory up to 2022/23, at which point it had achieved a cumulative growth of 9.2%.

These trends align with the projections outlined in the National Student Accommodation Strategy (NSAS) 2017 and are consistent with the findings of the Higher Education Authority (HEA) Student Accommodation Report published in 2019. In contrast, Mary Immaculate College (MIC) has maintained relatively stable enrolment levels, consistently exceeding 5,000 students annually.

Irrespective to annual growth rates, the data provided confirms that the three Universities in Limerick accommodated 30,155 students on a full and part time basis in 2023/24.

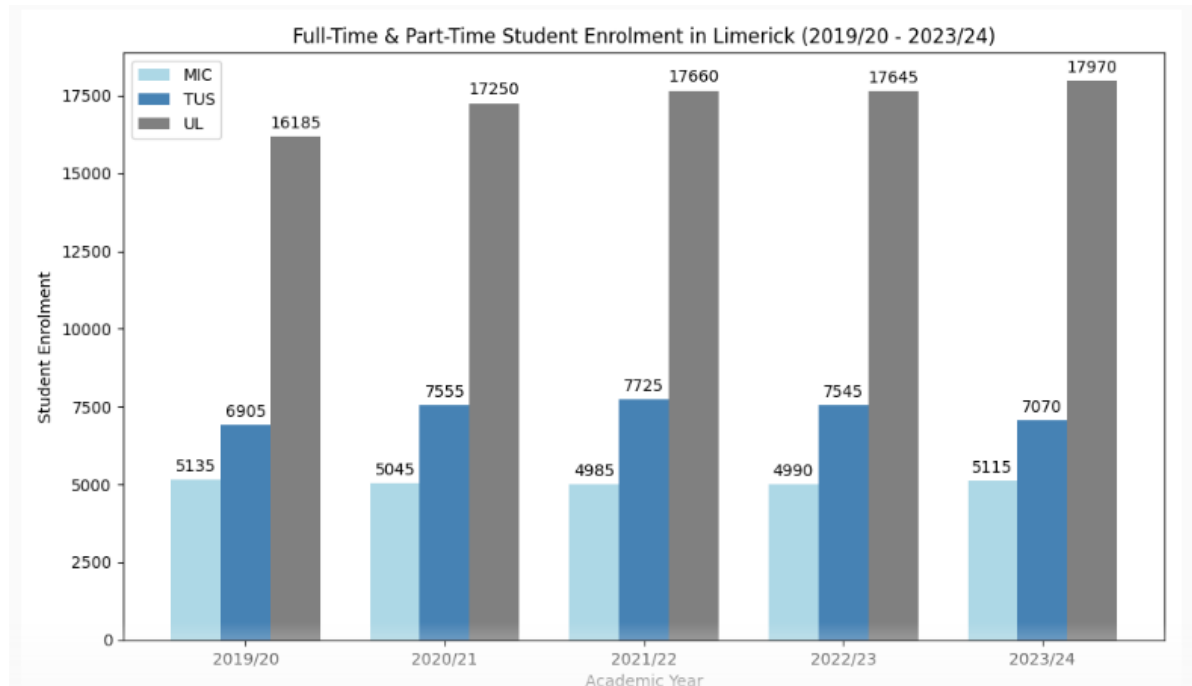


Figure 6.0 Source: Higher Education Authority Website - Statistics

7.2 Existing & Permitted Provision of PBSA

The NSAS detailed that there were 6,816 no⁶. student bedspaces in Limerick in 2017. Table 1.0 outlines the projected (planned) supply and demand for student bedspaces in Limerick to 2024 which is detailed in the NSAS.

Location	Supply 2017	Demand 2017	Supply 2019	Demand 2019 (excess Demand)	Supply 2024	Demand 2024 – Excess Demand
Limerick	6,816	7,724 (908)	6,831	9,000 (2,169)	8,181	9,798 (1,617)

Source: National Student Accommodation Strategy)

The most recent progress report published in Q3 of 2019, demonstrates that there has been limited provision of new student bedspaces in Limerick since the NSAS was published in 2017. The report identifies that between 2016 and June 2019, 7 no. bedspaces were constructed, and an application for 143 no. bedspaces was under consideration by Limerick City and County at the time the report was published.

A review of planning applications granted permission for purpose-built student accommodation in Limerick City has been undertaken which takes into account developments permitted since the Q3 2019

⁶ There is a discrepancy between this figure and the figure provided in Table 3.0 of this report which quantifies actual known student accommodation in Limerick City, sourced based on local knowledge and University Accommodation websites.

report was published. Whilst there has been limited PBSA commencements of significance in the Limerick Metropolitan Area since the Q3 update in 2019, a number of planning permission have been granted permission including:

Table 2.0 Proposed Student Accommodation Across Limerick Permitted Since Q3 2019			
Location	Planning Reference	No. of Bedspaces	Description / Notes
Hassetts Cross, Limerick	P19/710	162	Application under consideration during Q3 2019 progress report
O'Dwyer House, South Circular Road	20/531	2	Small-scale addition
St. Gerard Street, Rhebogue	20/1142	17	Medium-scale development
Former Railway Hotel Site, Parnell Street	Not specified	80	21 no. housing units repurposed by UL as student bedspaces
Courtbrack Avenue	Not specified	116	Redevelopment of former hotel site
Old Dublin Road, Rhebogue	Not specified	22	Located near Mary Immaculate College
Groody Road / Dublin Road, Castletroy	22/1216	202	Large-scale development
	25/60113	1,400	*Large Scale Residential Development – notification of decision to grant permission

Source: Online Planning System Limerick City & County Council

- *This only received a Notification of decision to grant permission on 25th September 2025 and thus could yet be appealed. It is not included in the assessment below. See Section 7.3*

This means that in Limerick, 608 no. student bedspaces have been constructed, or granted planning permission since 2019. This is substantially below the projected supply of 8,181 no. bedspaces anticipated to be delivered by 2024. Having regard to the quantum of student bedspaces actually developed and granted planning permission since 2019, relative to the demand projections for 2024, this would indicate that there is a shortfall of 2,374 no. bedspaces in Limerick. This figure is based on projected demand formulated in 2017 and is likely not to have regard to the increase in student population attending third level education since that time.

Of particular concern, is the fact that there appears to be only 89 no. additional and operational bedspaces since 2017. The remaining 521 no. bedspaces although granted planning permission, have not yet been constructed. Importantly, any large construction project, including student accommodation in excess of 100 bed spaces, is likely to take at least 16 months to complete following a grant of permission. This means that there will be no meaningful addition to the quantum of bedspaces in Limerick until after 2025. Thus, having regard to the proposed development of 270 no. bedspaces there still remains significant demand for student housing.

7.3 Proposed PBSA – Not Yet Consented

Having regard to the scale and quantum of student bedspaces proposed within a student housing development in Limerick City, recently decided by Limerick City & County Council but awaiting a final

grant of planning permission (after 4 week appeal period), it was considered appropriate to consider the impact of such development (if permitted and delivered) on the provision of PBSA in the city.

Planning permission has been sought for 1,400 bedspaces at Groody, Limerick Road in Castletroy, in proximity to the University of Limerick (P25/60113). If permitted and constructed, this development will satisfy a substantial quantum of the shortfall in student bedspace demand (2,374 spaces calculated up to 2024). Thus, having regard to this development if permitted and the proposed development of 270 bedspaces there would still remain a projected deficit of 704 bedspaces.

7.4 Summation

Having regard to the student enrolment figures detailed in Figure 6.0 and the number of constructed purpose-built student bedspaces as of Q3 2025 (6,910 no. bedspaces), it is submitted that the total number of purpose-built student bedspaces constructed and in operation in Limerick only accommodates circa 30 per cent of the total enrolment of students for the year 2023/2024.

A suitable ratio of student accommodation to students in Ireland is generally considered to be around 1:2 or 1:3, meaning there should be one bed space for every two to three students⁷. This acknowledges that not all students require on-campus or purpose-built student accommodation (PBSA), with some living at home or in other forms of housing. Thus, provision of PBSA in Limerick city is substantially below appropriate ratios.

8.0 CONCENTRATION OF STUDENT BEDSPACES IN VICINITY OF SITE

Table 3.0 lists the existing purpose-built student accommodation facilities in Limerick. It is noted that whilst the list is not exhaustive for all the student accommodation in Limerick, it gives a clear indication of the concentration of purpose-built student accommodation in the city.

Further it demonstrates that there are only two small purpose built student accommodation facilities within 1km of the site providing circa 55 no. bedspaces.

The proposed development of 270 no. student bedspaces will increase the quantum of managed student accommodation in the area, in a location that is easily accessible to the TUS Moylish Campus and MIC and a short bus ride to UL. Although located in excess of 1km from the Universities, the site is very well positioned within the city centre, with excellent connectivity as detailed in the Social Infrastructure Audit prepared by HRA Planning and accommodating the proposed development.

Cumulatively, the proposed development and the existing student accommodation will result in the provision of 325 no. bedspaces within 1km of the site. Such provision only serves 14.6 per cent of the student population (2,216 no.) within 1km of the site, as detailed in Section 7.2 of this report.

⁷ *National Student Accommodation Strategy 2017*

Table 3.0 Identified PBSA Facilities in Limerick			
Name	Location	Distance from Site (approx.)	Capacity (bedspaces)
Ashdown Student Village	Courtbrack Avenue, off South Circular Road	2.3km	210
Courtbrack Student Accommodation	Courtbrack Avenue	1.7km	8
Punchs Residence	Punch's Cross, Limerick	1.8km	72
Clontarf Hall	Clontarf Place	0.9km	48
City Campus	Edward Street, Limerick	1.4km	660
The Ostia Community	Augustinian Lane, Thomas Street	1km	7
5kGrove Island Student Village	Grove Island, Corbally, Limerick	2.1km	300
Parkview Hall	Rhebogue, Dublin Road	2.8km	210
Cratloe Wood Village	Old Cratloe Road	2.8km	610
Thomond Student Village	Old Cratloe Road	3.5km	570
Groody Student Park	72, Groody Student Park, Castletroy	4.8km	147
Courtyard Student Village	70, Bru na Gruadan, Castletroy	4.6km	225
Brookfield Hall	Castletroy	5km	550
University of Limerick On -Campus Accommodation	University of Limerick, Garraun, Limerick	5km	2,505
Troy Village	University of Limerick (Off Campus)	4.6km	170
Total			6,292⁸

Source: Based on local knowledge and University Accommodation websites

The map in Figure 7.0 displays the distribution and concentration of purpose-built student accommodation across limerick city in relation to the application site.

⁸ There is a discrepancy between this figure and the figure provided in Table 1.0 of this report which provides for NSAS bedspace figures. quantifies actual known student accommodation in Limerick City. Irrespective the supply and demand section of this report used the higher NSAS figure thereby ensuring consistency with national figures.



Esri, HERE, Esri UK, Esri, HERE, Garmin, GeoTechnologies, Inc., USGS

0 0.5 1 2 3 Kilometers

Figure 7.0 Existing Purpose Built Student Accommodation Facilities in Limerick City

9.0 ASSESSMENT

The proposed development seeks to deliver an additional 270 no. student bedspaces in the city centre on a site zoned for city centre use. 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".

The location of the site, in proximity to public transport and other amenities and services, is inherently suitable for student accommodation. As acknowledged in the Revised NPF *"the adaptive reuse of existing buildings and brownfield sites for student accommodation can assist with the reduction of vacancy and dereliction, thereby promoting vitality and vibrancy in settlements, in support of Town Centre First principles. The National Student Accommodation Strategy supports these objectives"*.

Having regard to existing and permitted student bedspaces (not yet constructed) in the city, based on the demand projections for 2024, as detailed in the NSAS, there remains a shortfall of 2,374 no. bedspaces in Limerick. The proposed development of 270 no. bedspaces endeavours to address this shortfall in provision, in an area of the city currently lacking supply.

Having regard to the zoning for the site and the objectives in the LDP supporting student accommodation, associated with the need and demand for student accommodation in the city, it is considered that the PBSA development must be deemed acceptable in principle.

Furthermore, the NSAS 2017 suggests that for every 4 bedspaces provided in PBSA there is potential for 1 no. residential unit to be freed up for the private rental market. Given this, there is potential for up to 67 residential homes to be released into the private market locally, helping to mitigate against any marginal increases experienced in student concentration which has been acknowledged as part of this analysis, while also speaking to the current housing crisis.

For clarification, as previously stated this analysis has been undertaken without any regard to the future TUS development proposed as Phase III of the Masterplan for Cleevess.

10.0 CONCLUSION

This report has demonstrated 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 a National Strategy that was prepared in 2017. These figures highlight that there is a need to deliver more purpose built student accommodation in the city.

The proposed development is located within the city centre and could potentially accommodate student demands arising from any of the Universities in the city, having regard to its excellent connectivity. The report has demonstrated that the proposed development would not result in the over concentration of student accommodation within 1000m of the application site.