

## CHAPTER NINE CULTURAL HERITAGE - ARCHITECTURE

### 9.1 INTRODUCTION

This chapter of the Environmental Impact Assessment Report (EIAR) is concerned with the cultural and architectural heritage of the development site known as Cleeves, inclusive of the protected structures within and those deemed within the curtilage of the 'early industrial complex'.

This chapter should be read in tandem with Chapters 8.0 Archaeology & Cultural Heritage and Chapter 12.0 Landscape Visual Impact Assessment.

This chapter is dedicated to assessing the history, development and extent of surviving features related to heritage, as well as that of the immediate adjoining areas and/or the areas with historic associations with the development site. It should be read in conjunction with the Conservation Report, hereafter titled the 'Statement of Significance' which is available within appendix 9.1. This chapter sets out the potential vulnerability of these heritage assets, analyses the possible impacts of the proposed multi-phase development at the site, and recommends mitigation measures for same. Where mitigation measures are concerned, close reference should be made to the Architectural Design Report which includes key documents setting out the integral measures taken to mitigate negative impacts on heritage. This will be referred to in the course of this chapter. Mitigation is assessed in summary near the conclusion of the chapter.

### 9.2 ASSESSMENT METHODOLOGY

#### 9.2.1 Standards and Guidance

Nationwide legislation regarding the protection of cultural heritage sites comprises:

- NIAH Handbook and 'Architectural Heritage Protection – Guidelines for Planning Authorities' 2011
- National Monuments Act 1930, amended 1954, 1987, 1994 and 2004;
- Heritage Act 1995;
- Architectural Heritage (National Inventory) and Historic Monuments (Miscellaneous Provisions) Act 1999; and
- Planning and Development Acts 2000, as amended 2024.

The following standards and guidelines were complied with as part of this assessment:

- Architectural Heritage Protection Guidelines for Planning Authorities (2011, updated 2022), Department of Arts, Heritage and the Gaeltacht.
- Environmental Impact Assessment Reports Guidelines 2022

#### 9.2.2 Methodology of Assessing Heritage Significance

Special Interest and Cultural Significance have been set out in the Statement of Significance revision P08 last updated in September 2025, see Volume II Appendix 9.1. The method for assessing significance is included within the document and repeated here for clarity.

### 9.2.2.1 Assessing Significance

*Significance has been assessed under the guidance within the NIAH Handbook and 'Architectural Heritage Protection – Guidelines for Planning Authorities' 2011. The designations of significance have been separated into 'high', 'medium', 'low' and 'negative' the critical observation being that not all the site's history imbues heritage significance. Significance is determined relative to the site's special heritage interest stemming from its development in the processing of flax and later, condensed milk. This assessment seeks to place each building within the context of the 'early industrial building complex' and to identify its presence relative to the phases of ownership and operation. By identifying the historic evolution of the site and its buildings, the assessment offers context to what can be described within the curtilage of significance.*

This assessment has been developed from site visits and written assessments undertaken in 2015, 2020 and 2024 by Architectural Conservation Professionals (ACP) and FCBStudios.

The assessment of heritage significance was undertaken in two phases. The initial phase consisted of a desktop survey, including review of historic maps, primary and secondary research resources, built heritage records, surveys, and relevant legislative and guidance documents. The second phase entailed multiple field inspections of the proposed development site starting in 2019. Surveys conducted by ACP in 2019 and early 2024 provided an assessment of stability and condition. The inspections of late 2024 and early 2025 were specifically concerned with the investigation of the Flaxmill structures relative to emerging development proposals and potential for impact. The outcomes and findings of each of these steps have informed the content of this chapter and guided the development of designs. Enhanced Understanding – Periodic structural condition assessments have provided a general overview of the complex. These were last updated in April 2024. The investigations that have guided the repair of the main mill have also improved understanding of the Flaxmill phase structures generally.

### 9.2.2.2 Limitations

The site is a disused, former industrial complex in constant operation since the late 1800s. Many of the buildings became unusable during the second half of the C20th and were left to decay. The use of asbestos and the poor repair of the structures have meant that access to some spaces was not possible. The presence of C20th linings has concealed earlier wall surfaces making it impossible to be explicit about the integrity of fabric that cannot be seen. Nonetheless, each building has been visited and where possible, entered to permit visual inspection. This has included the use of ladders to enter roof void and access roofs. Spaces that have not been entered or accessed due to health and safety limitations include:

- 02. Chimney - stack interior
- 04. Water Tank – interior of the office formed below the tank
- 06. Reservoir – beneath the water's surface to inspect the piers
- 09. Cheese Plant – end room associated with the house, viewed but not entered.
- 11. Weaving Mill – upper storey, unsafe due to deteriorated asbestos roof and structural concerns.
- 11. Cold Store, rear building – reliance on earlier surveys. Unsafe to access due to asbestos.
- 12. Upper Reservoir – overgrown and unsafe to access.
- 13. Shipyard Warehouse – not entered.

Where physical access has been prevented or restricted effort has been made to obtain both historic and current information to establish some degree of understanding. This has included obtaining records from the 2010s that described the site after operation ceased and before some spaces became unsafe to access. It should be noted that the scope of limitations is considered to be minimal when set against the extent of the site and the scope of investigation and research that has been undertaken.

### 9.2.3 Methodology of Assessing Heritage Impact

Section 51(1) of the Planning and Development Act 2000 (as amended) states the requirement for the identification of protected structures to be described in terms of the eight fields of special interest:

*For the purpose of protecting structures, or parts of structures, which form part of the architectural heritage and which are of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest, every development plan shall include a record of protected structures, and shall include in that record every structure which is, in the opinion of the planning authority, of such interest within its functional area.*

Therefore, The Act defines architectural heritage as connected to each of the eight specific areas of Special Interest<sup>1</sup>. It is for each Planning Authority to decide if a structure is of sufficient interest with regard to any or all of these eight fields of special interest to warrant its inclusion on the Record of Protected Structures (RPS). It follows, therefore, that changes to the structure will be measured according to the impacts upon the fields of special interest. The effect can be positive if special interest is enhanced or negative if special interest is diminished. Accordingly, both the assessment of Heritage Significance and the assessment of Heritage Impact draw conclusions relative to how change impacts upon special interest.

#### 9.2.3.1 Hierarchy of Significance and Sensitivity

Legislation provides varying degrees of legal protection for heritage, particularly through a range of acts and statutory instruments. Key legislative frameworks include:

- National Monuments Acts 1930–2004
- Architectural Heritage (National Inventory) and Historic Monuments (Miscellaneous Provisions) Act 1999
- Planning and Development Act 2000 (Part IV: Architectural Heritage)
- Heritage Act 1995

The degree of protection depends on the designation of the site or structure (e.g., national monument, protected structure, or inclusion in the National Inventory), the specific legislative provisions that apply, and the enforcement mechanisms available under each act.

‘Environmental Impact Assessment Reports Guidelines 2022’ sets out the recommended methodology for assessing effects of change. In the briefest of references, the Guidelines note that ‘designated architectural heritage’ and ‘other significant architectural heritage’<sup>2</sup> should be collected within the assessment. ‘Other significant architectural heritage’ is interpreted as referring to buildings, groups of

<sup>1</sup> Special Interest – as defined under 2.5.4 of ‘Architectural heritage protection – Guidance for planning authorities 2011’.

<sup>2</sup> 3.3.6 – EPA - Guidelines on the information to be contained in Environmental Impact Assessment Reports 2022

buildings, and sites that, while not necessarily individually protected or monumental, are recognised for their contribution to the character, history, and cultural value of the built environment. As such, structures not on the RPS may be considered as having architectural heritage interest. While these buildings do not receive the statutory protections afforded to protected structures, they may still be recognised for their heritage value during planning assessments or as part of ongoing surveys and inventories. In each case, the fields of special interest are the means by which protected and non-designated structures are valued. For the EIAR heritage assessment, applying hierarchy within the assessment is critical to guide the determination of the scale and significance of effects relative to the value and sensitivity of the asset.

While special interest may be present in both protected and non-designated assets, equivalence between the two should not be presumed as to do so would be to treat protected structures and non-protected structures equally. As an example, and as described under section 13.1 of the Guidance on Architectural Heritage Protection, while a structure (featured, etc) may be within the curtilage of a protected structure, and thereby inform the special interest of that structure, it does not in its own right have or define a curtilage. Where these structures within a curtilage are present but are not explicitly described on the RPS, analysis is essential to determine their value relative to the protected structure and how they inform its special interest. This reflects the principle of a hierarchy that is already present in the degrees of protection afforded heritage according to its designation.

As such it is evident that a hierarchy of sensitivity is present in the receiving environment. This ranges from heritage assets of greatest value though to those of limited and possibly only local value.

Locally designated / lower:

- Architectural Conservation Areas (ACAs) and
- Record of Protected Structures (RPS)

to nationally designated / middle:

- Protected Structures on the National Inventory of Architectural Heritage (NIAH),
- National Monuments,

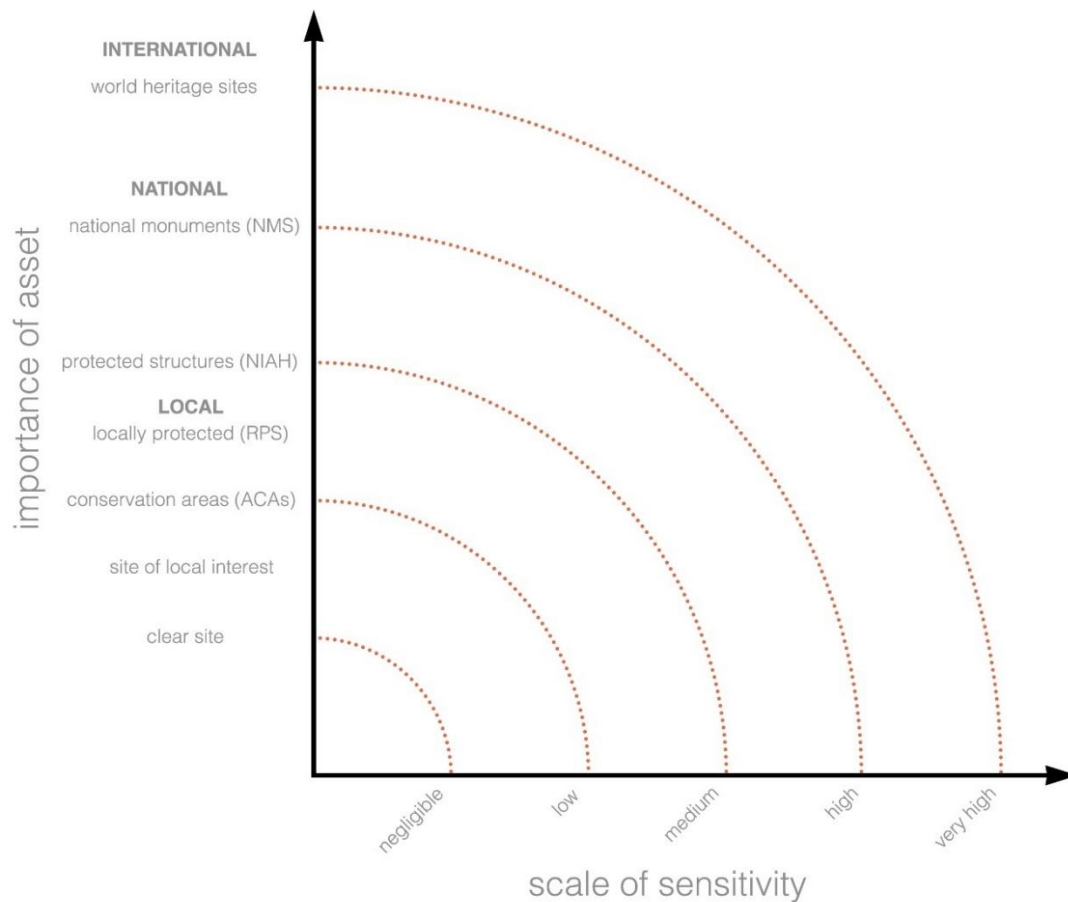
and internationally designated / upper:

- UNESCO World Heritage Sites.

This hierarchy must be reflected in the sensitivity of the receiving environment to the effects of change, primarily change driven by development.

**Potential for Positive Heritage Outcomes** - All architectural heritage assets can be subject to positive outcomes with the weight of positive mitigation to National Monuments and Nationally Significant Structures being afforded greater weight than those to Conservation Areas and lesser still to those assets or structures that are not formally designated.





**Figure 1** – Scale diagram to inform understanding of hierarchy of heritage value potential.

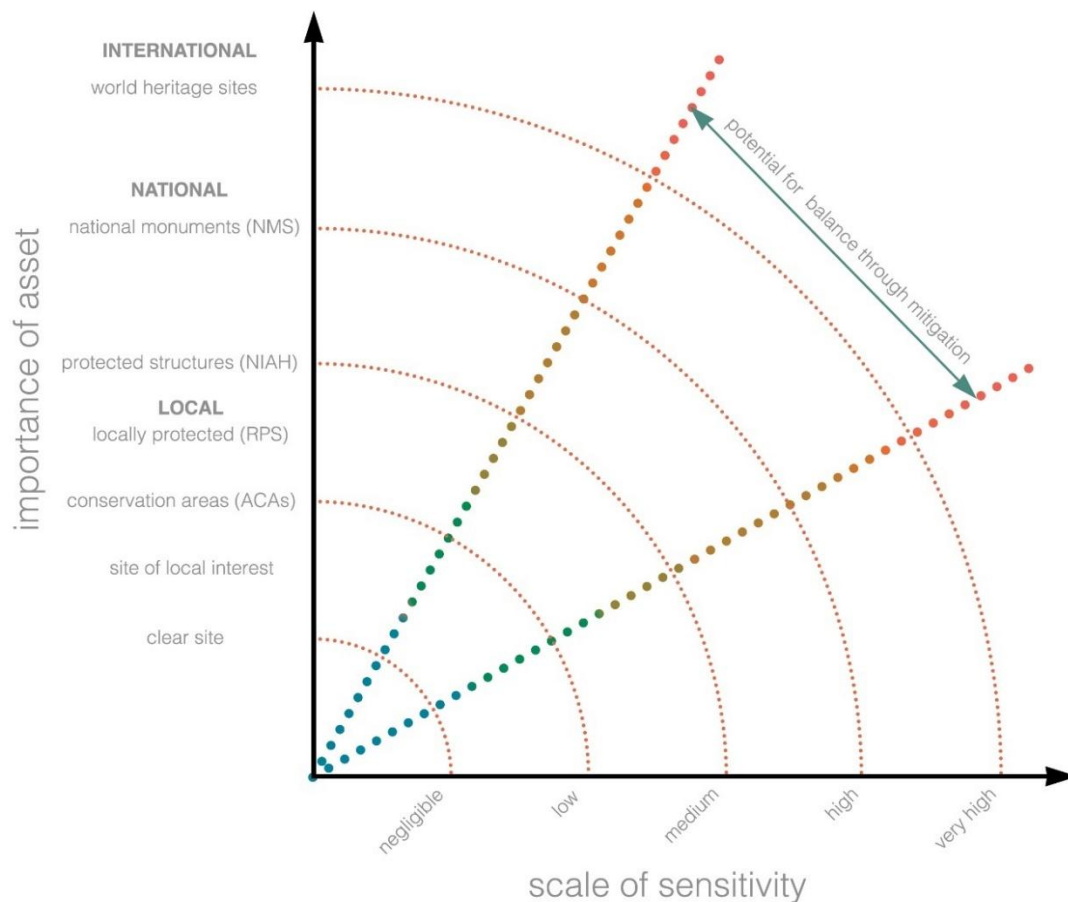
Reflecting this hierarchy within the proposals for change allows designers to prioritise outcomes that can support the successful conservation of cultural heritage. Where change occurs to an asset of architectural heritage, the requirement is for positive heritage outcomes that can be weighed in balance against changes that result in negative impacts. These mitigating (positive) outcomes must be afforded weight proportionate to the value and significance of the asset. Within the assessment this is referred to as ‘integral mitigation’ and ‘proposed mitigation’.

**Integral Mitigation** - measures embedded within the designs for change which seek to prioritise the conservation and reuse of protected structures through the application of repairs and enhancements that permit the appropriate reuse of the assets, their sensitive integration into wider proposals, and the retention of character ensuring special interest is preserved.

**Proposed Mitigation** – Compensatory measures that are typically reactive and emerge during the assessment process which can enhance the conservation of Special Interest and Architectural Heritage. These are often discrete measures added to enhance compensation and to afford balance to negative effects.

It is within this sliding scale that mitigation of the impact of proposals should be assessed. Proportional weight is to be afforded to mitigation measures relative to the significance and sensitivity of the

protected structure / heritage asset / receiving environment. Mitigation in the form of repair and reuse of a protected structure hold greater potential than the equivalent for a non-designated structure.



**Figure 2** – Scale diagram to inform understanding of hierarchy of heritage value potential and balance potency.

### 9.2.3.2 Seeking Balance

Establishing the threshold of balance is key. In the instance of the Proposed Development, the Cleaves Riverside Masterplan has ambition for far-reaching and extensive cultural enhancement of the Flaxmill Complex, inclusive of structures within its curtilage identified as holding positive heritage significance. The reuse of these buildings is being delivered in phases with consolidation and repair of the Main Mill already underway. The masterplan is seeking to conserve and reuse the protected structures with maximum retention of historic fabric and minimum intervention to achieve appropriate reuse as summarised in the Heritage and Conservation Strategy described in the Architectural Design Report. Change is being focused on these aspects of the site that are most able to tolerate change so that positive reuse can be achieved. Where structures are of negative significance they are to be removed. In addition and to enable the positive redevelopment of the site a number of structures have been identified for demolition. As such, mitigation is sought through a balanced approach with the principle being that balance is a quintessential component of the Proposed Development and that the conservation and public reuse of the Flaxmill Complex hold potential that can exceed that of the significance of effects that might impact Architectural Heritage receptors and their Special Interest.

### 9.2.3.3 Demolition within the Curtilage of Protected Structures

Where demolition is proposed within the curtilage of the protected structures it is necessary to assess the potential for impact to heritage values. Within Cleveleys, this applies to the removal of parts of structures as well as the removal of whole structures. According to the Architectural Heritage Protection Guidelines for Planning Authorities:

*“where a structure is protected, the protection includes the structure, its interior and the land within its curtilage and other structures within that curtilage (including their interiors) and all fixtures and features which form part of the interior or exterior of all these structures. All works which would materially affect the character of a protected structure, or a proposed protected structure, will require planning permission”*

This aligns with the definition of “structure” in section 2 of the Planning and Development Act 2000, as amended. It indicates that everything within the curtilage of the Factory Complex and Chimney Stack is subject to the same protection afforded the protected structure.

“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 21<sup>st</sup> century. The Statement of Significance includes historic analysis and an assessment of heritage significance for each of the structures of the complex. It described each structure relative to the phasing of the site and its value relative to the protected structures on the Record of Protected Structures (RPS). It is of note that not all the structures and features present on the site inform the special interest of the protected structures. This is an important distinction. Where structures within the curtilage of a protected structure do not positively inform the special interest of that structure, their conservation, preservation and improvement are not necessarily compatible with maintaining the character and interest of the protected structures, and therefore warrant a lower level of protection in the context of the assessment.

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 or when the proposals seek change of a scale and order that will result in the substantial or total loss of significance.

In the case of the Phase II works, there are two complete structures 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, and the Chapter demonstrates that the requirement for exceptional circumstances has been met. Section 9.3.8 Summary of Heritage Significance and Tables 8 to 23 include descriptions and summaries of heritage significance as set out in the Statement of Significance. This has aided the assessment of impact relative to significance. There are other structures that hold special interest of which an extent of fabric has been identified for removal. Refer to section 9.4.1.1 which includes a summary list of Phase II changes and identifies which curtilage structures are to be altered. Each is further analysed in section '9.5.2. Likelihood of Significant Effects – Phase II Application Site'. In each of these instances the scope of fabric to be demolished does not constitute the complete demolition of the asset or substantial loss of significance<sup>3</sup>. These are considered within the assessment but are not categorised as complete demolition. Section 9.3.4 identifies the grouping of the structures to permit the assessment of impact and therefore do not need to meet the 'exceptional circumstances' threshold. Group 6 collects the Semi-detached houses and the Office and Laboratory.

### 9.3 EXISTING RECEIVING ENVIRONMENT

#### 9.3.1 Masterplan Site

The Masterplan site is known as the Cleeves Riverside Quarter, a collection of sites that forms a development parcel on the edge of the River Shannon. It is described in the Masterplan Vision Document<sup>4</sup> as *"being situated to the north-west of the River Shannon, yet also being assigned part of the City Centre Area."* The Masterplan site takes in the former Flaxmill industrial complex, the disused Former Salesians Secondary School, and former Shipyard site, now a warehouse and carpark. The North Circular Road runs between the Flaxmill and Shipyard sites. All three of these sites are described within the Statement of Significance, Volume II Appendix 9.1. None of these sites are within Architectural Conservation Areas and only the Flaxmill complex contain structures listed on the RPS which are also present on the NIAH.

To the east, O'Callaghan Strand runs along the edge of the development site, separating it from the River Shannon. The development site is bound by Condell Road to the south, Salesian Primary School and Shelbourne Road Lower to the west, Stonetown Terrace to the northeast, and the backs and rear gardens of the houses along Clanmaurice Avenue to the north.

Topographically, the receiving environment gently rises from the low-lying Shannon Banks and flood zone to the west of the site, to east and north as it approaches the bounds of Limerick City. Within the scope of the site, the gradient changes to rise from the river at O'Callaghan Strand to the northwest and north towards Shelbourne Road Lower and Ennis Road, and beyond. The quarry forms a basin within the topography with Clanmaurice Terrace set above.

The Masterplan site rises from its lowest elevation at 3m ordnance datum in its southeastern quadrant at St. Michael's Rowing Club and O'Callaghan Strand to 7m midway along its North Circular Road aspect north-eastwards to the northwest end of Stonetown Terrace (8m), and 11 to 12m ordnance datum at the Salesian Secondary School. The most pronounced natural incline is evident on the

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<sup>3</sup> Sherwin v An Bord Pleanála and CWTC Multi Family ICAV [2024] IESC 13).

<sup>4</sup> Document – 'CRQMP-FCBS-XX-XX-RP-AA-000001-Masterplan Vision Document P01'

northern approach from North Circular Road to the Salesian school buildings. The quarry face, internal to the site gives a very dramatic, artificial stepped element to this topography.

### 9.3.2 Character Areas<sup>5</sup>

The Masterplan Character Areas are described in section 2.2.1 of this EIAR. The following offers a summary relative to the specific character of the Flaxmill complex.

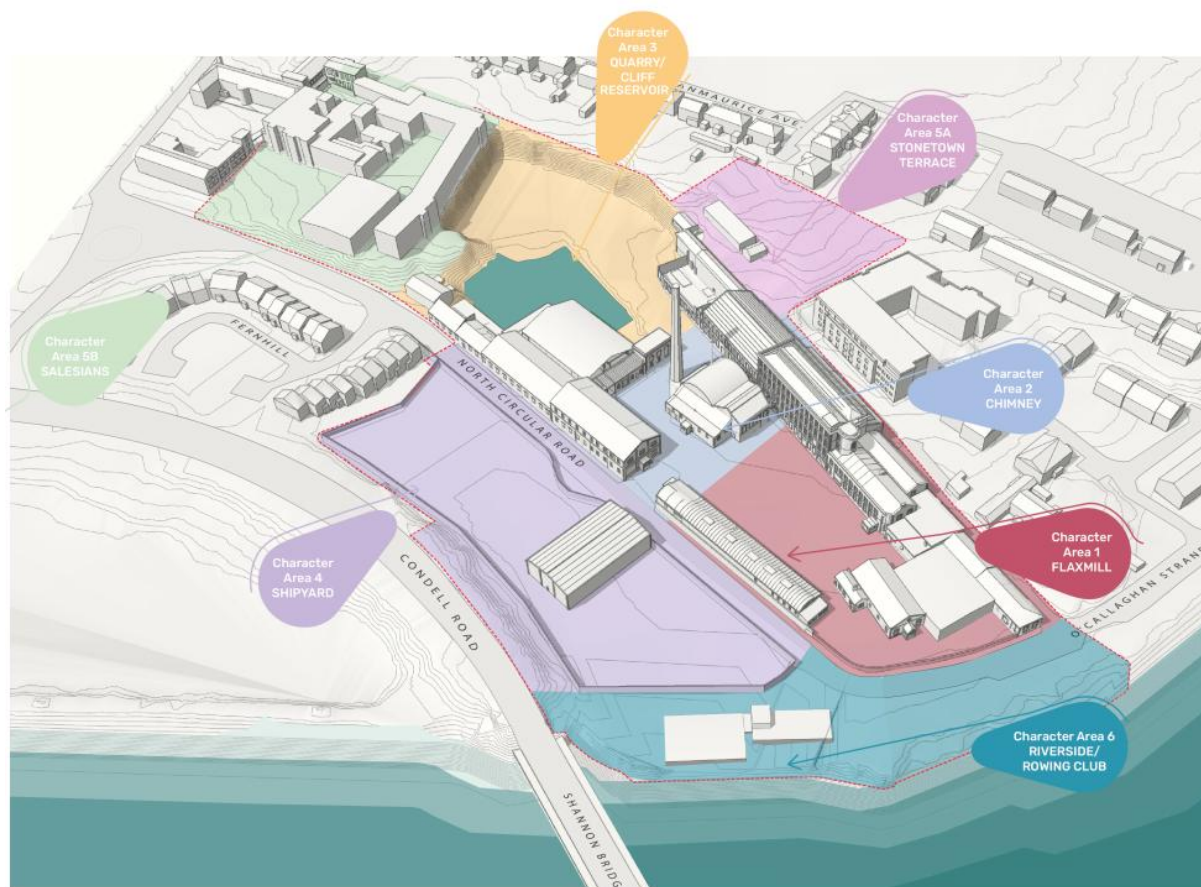
The character of the Mill Complex is central to its interest and significance. This is the dominant feature within the wider development site. The Cleeves Riverside Quarter *“comprises a number of distinct parts including the Flaxmill Site (considered the ‘main’ Cleeves Site) which includes 2 Protected Structures and other significant historic buildings, the Shipyard Site which is directly across the road from the Flaxmill Site and the Stonetown Terrace Site which is adjacent to the Flaxmill Site but with access from Stonetown Terrace.”* (p106) and illustrated on Map 5.2 (p108). These are the Character Areas of the development site.

Urban Character – Map 3.14 identifies the site as an ‘important waterside building’ under the description of *“a combination of elements including public open space and amenity areas, important heritage buildings and local and cultural landmarks.”* It also sets out the “emerging character” of the Cleeves site (p80) likely owing to its historic isolation from the City due to its enclosure beyond a tall boundary wall. The Cleeves Chimney is described as an important existing landmark (p80).

The enclosed nature of the site has isolated it from the City. The main mill building, Engine House and chimney have been the dominant historic structures to establish the early industrial character of the site. Within the development site it is possible to further define the character areas.

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<sup>5</sup> [Building-Height-Strategy-for-Limerick-City.pdf](#)



**Figure 3** – Development Zone, Character Areas, extract from the Illustrative Masterplan - Vision Document 'Masterplan Principles'.

### 9.3.2.1 Mill Complex Character Areas

**Area 1 – Flaxmill** – The area is the mill yard southeast of the engine house. The OS map of 1870<sup>6</sup> offers the clearest sense of the length and breadth of the mill yard. The photo on the cover of the Statement of Significance c.1900<sup>7</sup> shows the yard open and dominated by the main mill and engine house. In its original form the cart entrance provided access from O'Callaghan Strand into the mill yard. This would have afforded an imposing sense of arrival. By the 1960s this entrance had been blocked up and all traffic routed to the entrance opposite the shipyard site. The loss of this access route and the encroachment of structures at the southeast end of the mill yard reduced the sense of arrival and sense of scale. Today the southeast end is infilled with a combination of low-rise elements some of which have been formed through the adaption of existing structures. They have reduced the open area and separated the yard area from the enclosing wall to the southeast. Early photos show an unkempt yard of hard surface with grass at the edges, likely where there was no traffic. Today the ground is covered in concrete which would have eased traffic movement. While the yard has always been enclosed behind a boundary wall, the reduction in the open aspect of the mill yard has reduced its legibility and diminished the grandeur of the early industrial, structures specifically the Counting House, Engine House and Main Mill.

<sup>6</sup> Statement of Significance, fig 17.

<sup>7</sup> Statement of Significance, fig 64.



**Area 2 – Chimney** – The area around the base of the chimney is defined by the rear of the engine house, the water tank building, reservoir edge, weaving mill and the yard up to the warehouse. Historically, this was toward the rear of the site with the weaving mill the deepest part. Development in the early 1900s entailed recovering of the ground at the edge of the reservoir and the addition of buildings in the quarry which would have increased traffic in this area<sup>8</sup>. Today, the use of the quarry as a building depot means this area is used as an access way. The space has an enclosed feel with buildings defining its edges.

**Area 3 – Quarry and Reservoir** – The reservoir and quarry were not known to be occupied before the early 1900s. A photo from c.1947 captures the reservoir, clear of plants with a defined edge. The quarry is occupied by one or two large warehouse style structures. The former weaving mill, now at two storeys, formed the east extent. The incomplete structure of what was to be an extension to the weaving mill is present then as it is today. To the south, the back of the long building and semi-detached houses contain the site. The quarry face defines the north and west extents, dominating the quarry space. The space is enclosed and invisible to anyone outside the site. The quarry's use as a building depot has continued its industrial function.

**Area 5a – Stonetown Terrace**. This is the area of land above the mill complex. It was historically open ground which became enclosed as adjacent plots were developed. It appears to have remained unused until its partial development in the 1940s to accommodate water storage above the mill. Today the space is overgrown and disused. It does not inform the character or significance of the mill complex.

#### Summary of Mill Complex Character

These three areas largely define the extent of the historic mill complex. The encroachment of structures has diminished the legibility of the historic buildings and the mill yard. The accumulation of industrial furniture in the form of pipe gantries and fences has obscured the buildings. Stock piling of building materials has left the quarry space appearing at odds with the adjacent mill. While these changes have obscured the simplicity of the early mill complex, they have not resulted in its destruction.

#### 9.3.2.2 Shipyard Character Area

**Area 4 – Shipyard** – This is a carpark with a 1990s RC warehouse at its centre. Historically it housed workshops and various industry some of which was connected with the adjacent shipyard. The Shipyard was destroyed when the Condell Road and Shannon bridge were built in 1986. The space is characterised by the fragments of building and boundary walls that enclose it. These are a mixture of historic and late C20th walls. The historic walls have been adapted and altered. Many have been increased in height with the addition of concrete and former windows closed-up with concrete blocks. The Condell Road is a dominant feature that has completely redefined the nature of the site which once had an open aspect onto the Shannon.

The Shipyard area does not inform the significance of the flaxmill complex or define its character areas.

#### 9.3.2.3 Riverside Rowing Club Character Area

**Area 6 – Riverside and Rowing Club** – O'Callaghan Strand once skirted the shoreline of the Shannon and turned inland along the North Circular Road. The enclosing wall of the mill complex separates it from the road and riverside. The construction of a new boat and club house for St Michael's Rowing

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<sup>8</sup> Statement of Significance, fig 56.



Club in 1940 created a formal link between the shoreline and its recreational use. This has meant this area is well used and an important aspect of social activity near the site. The arrival of the Shannon Bridge has reduced the open aspect of the club.

The rowing club does not inform the significance of the Flaxmill complex or define its character areas.

#### 9.3.2.4 Salesians Character Area

**Area 5b – Salesians** – The secondary school occupies the site above the quarry to the northwest of the mill complex. It was initially open fields before the construction of Fernbank House, a Victorian Villa. This was set in open grounds extending to the rear. It became a school in 1924. Between 1951 and the 1970s it was dramatically extended. The original building was lost beneath layers of change, and the gardens were hard landscaped to provide a yard and parking for the school. Other buildings were added in the 1990s. The school was vacated in 2024.

The site has an elevated position over the North Circular Road. The enclosed form of the buildings means that there is almost no aspect into or out of the site. The spine of the building range along the top of the quarry overlooks the mill complex. From the east bank of the Shannon the school is visible on the horizon.

The Former Salesians Secondary School (including subsumed Fernbank House) does not inform the significance of the Flaxmill complex or define its character areas.

### 9.3.3 Flaxmill Complex Historical Background

The flaxmill complex defines the heritage context for the Cleeves Riverside Quarter. The second part of the Statement of Significance offers a detailed history of the site, its ownership and evolution. The statement includes reference to mapping and offers analysis of the development of the site. The assessment of heritage significance includes detailed accounts of phasing and significance. Six phases have been identified in addition to the initial use of the site as a quarry. These have been mapped over the site's ownership and operation and used as the basis upon which change and significance is assessed.

**Pre-development** – c.1830s -1850 Quarry.

**Phase 1.** 1850 to 1877. The site was substantially developed between 1850 to 55 to process flax from the raw material into linen. Despite best intent, the venture was not competitive and failed. The mill was sold in 1876. This was a bold vision to generate industry that could deliver economic stability exploiting latent potential in the region's people and land. Its failure has been attributed to the lesser quality and value of the linen it could produce. There is little record of the lives of the people who worked in the mill.

**Phase 2.** 1878 – 1883. The mill lay empty and was briefly used to store flour.

**Phase 3.** 1884 – 1927. The redevelopment of the site for use in the processing of milk. Initial commercial activity by the Cleeves brothers began on the shipyard site in 1881 where they operated a coffee roasting business. They took ownership of the former flaxmill in 1884. Adaption and redevelopment of the site progressed between 1884 up to 1905. The business declined due to changing economic context

and civil action. It was sold in 1927. The story of the Cleeves Brothers is well documented. There are some details of the lives of the people who worked in the factory. The original vision for successful business that offers regional economic stability was achieved with dairy processing. Cleeves' purchase of milk was a major factor supporting farming practice in the region.

**Phase 4.** 1927 – 1974. The factory moved into public ownership. Changes were made to the wider building complex. Several original buildings were demolished and replacements built often over the same footprint. Some of the buildings were adapted resulting in changes to the original flax phase structures. The place of condensed milk and toffee in the broader social context is well documented. People alive today have fond memories of Cleeves Toffee and Condensed Milk.

**Phase 5.** 1975 – 1986. Ownership moved to Golden Vale. Changes to the buildings were utilitarian with most entering a phase of managed decline. New and modern equipment was installed to allow for the appropriate processing of milk. This was typically implemented without regard for the historic buildings' fabric. The ongoing success of the business continued to support dairy farms and provide employment in the City.

**Phase 6.** 1986 – Present. The decline of the business until it ended operation in 2011 and subsequent sale to Limerick City in 2015. During the last decade of disuse, a few interesting cultural events have been held at Cleeves Factory. The interest in a decaying industrial site has inspired visitors and served as a thought-provoking backdrop.

**Summary of Interest** - Phases 1 and 3 substantially embody the architectural heritage and interest of the site. These define the significance of the buildings that are present. The original mill complex structures typically embody Architectural, Artistic and Technical interest for their designs and as an exemplar of a formal early industrial complex. Archaeological interest is present in the incomplete structures and surviving fragments of earlier buildings. The complex as a whole embodies Historic, Cultural and Social interest for the original vision to catalyse industry and implement economic security. Interest is also found in later events on the site including the operation as a condensed milk factory, place of social reform and most recently the one-off events hosted at the site after 2015.

Changes imposed on the buildings during Phases 4 to 6 have typically eroded the legibility and integrity of the original Flaxmill complex.

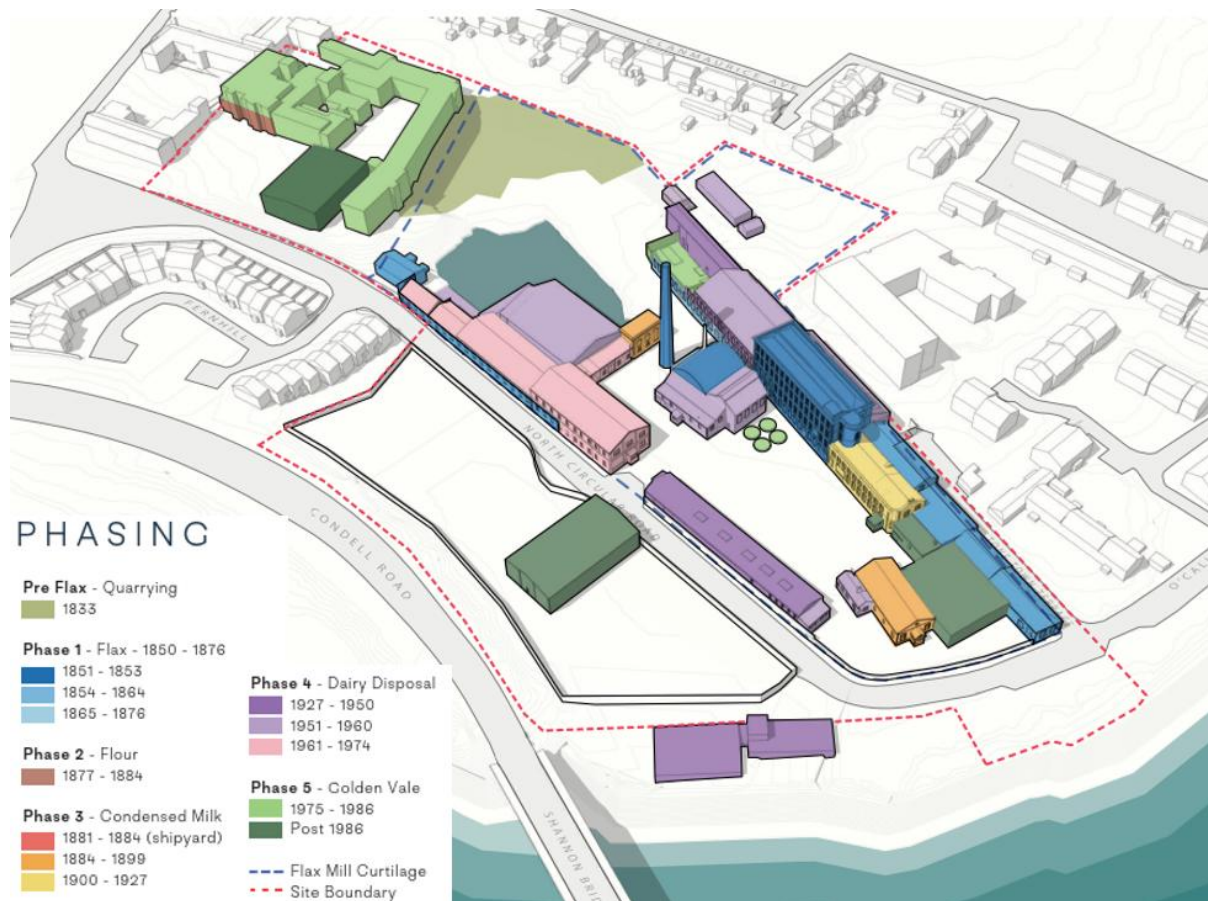


Figure 4 - Phasing Analysis, extract from the Statement of Significance, fig.6.

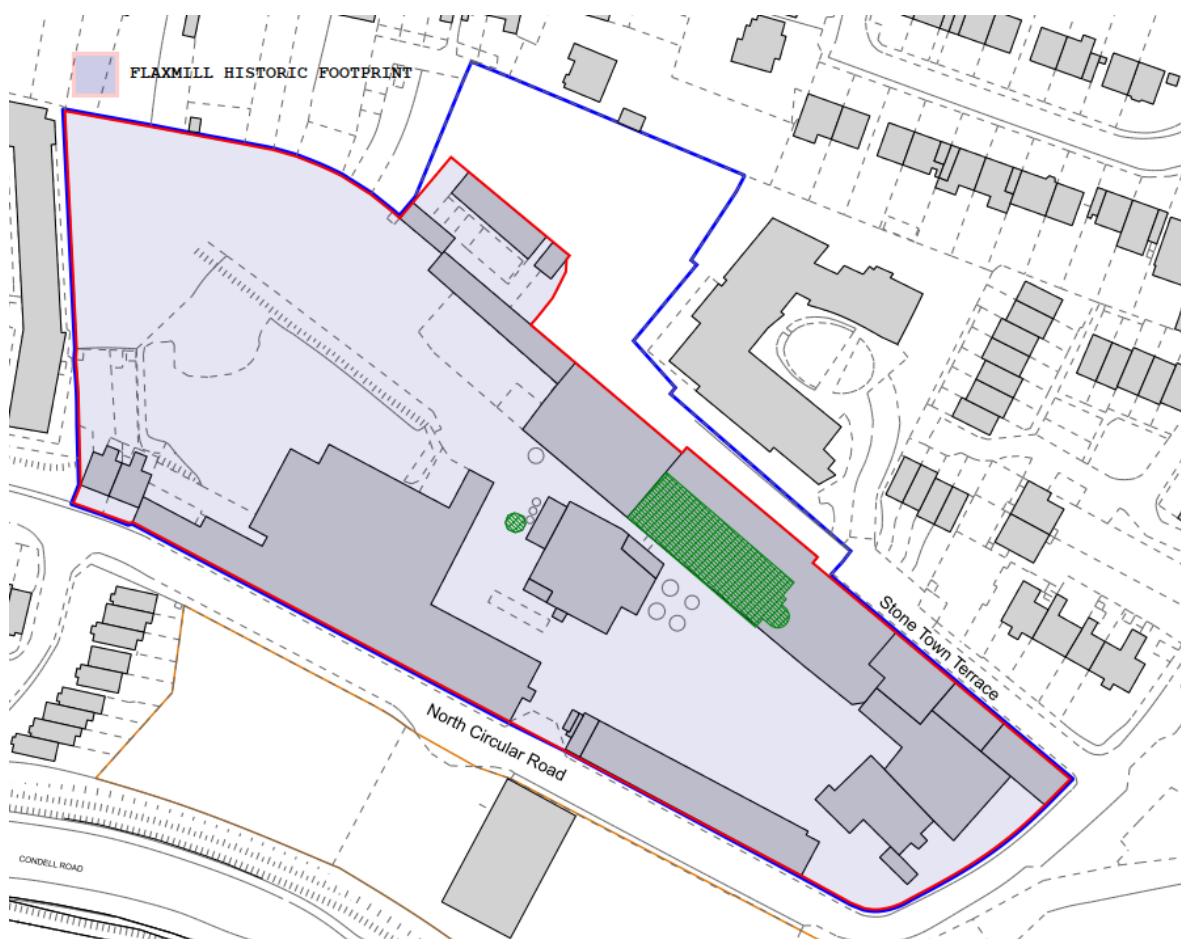
### 9.3.4 Cultural Heritage Context of the Phase II Site

**Flaxmill** - Within the Cleves Riverside Quarter Phase II application boundary there are two assets on the NIAH survey, the Main Mill and Chimney, these are also on the local register. Within the appraisal, the site is described as *'a vast early industrial building complex, dominated by a massive limestone factory building'*. There is an inherent level of protection afforded those structures of the Flaxmill period. The Statement of Significance provides detail on this matter and extensive analysis relative to the phases of development on the site which attributes a sophisticated understanding of phasing and significance.

**Shipyards** - Beyond the bounds of the Flaxmill Complex there is the former Shipyards Site which holds archaeological interest. This site and the enclosing wall are not described on the RPS. While not defined as part of the Flaxmill complex, the historic link between the two sites is set out in the Statement of Significance. The Shipyards Site has special interest largely based in archaeology. When assessing the potential for impact, it must be recognised as distinct from Flaxmill. The curtilage of the former shipyard site is defined by the North Circular Road (north edge), passage between the Rowing Club, Condell Road (south edge) and the boundary wall to the back of the houses on Fernhill. The curtilage is a mixture of historic boundaries and relatively modern interventions most notably the Condell Road and Shannon Bridge.

**Former Salesians Secondary School** - To the northwest, the former Salesians Secondary School sits above the Flaxmill site. This is also described in the Statement of Significance. It retains the fragments of an earlier building that hold special interest due to the craftsmanship of some surviving components. This building is not on the national list, not on the local register and not within the curtilage of the complex. While fragments within the building may have some cultural value relative to their artistic interest the building is not of special interest and should not be evaluated with equivalence to the Flaxmill Complex.

For the purpose of the heritage assessment, the curtilage of the Flaxmill site is described within the Statement of Significance and reflects the historic boundary of ownership and operation. The historic curtilage of the Flaxmill site does not extend as far as the 'Cleaves Riverside Quarter' Phase II application boundary. This is an important distinction. The attribution of the 'Cleaves' name to the wider site has been done to offer ease or reference and to align the redevelopment with the adaptive reuse of the site characterised by its heritage. The 'Cleaves' name should not be interpreted as ascribing heritage significance to the extent of the Master Plan site beyond the curtilage of the historic Flaxmill and Dairy Processing site.



**Figure 5** - 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.

To aid the assessment the site and its adjacencies have been separated out into the following groups:

| GROUP                 | Summary Description                                                                                      | Reference                                    |
|-----------------------|----------------------------------------------------------------------------------------------------------|----------------------------------------------|
| <b>Group 1</b>        | Formal Heritage Designations – <i>Protected Structures on the Record of Protected Structures</i>         | Section - 9.3.4.1<br>Table - 1, 8 & 10       |
| <b>Group 2 to 7</b>   | Curtilage Structures – <i>structures / features with heritage connection to the protected structures</i> | Section - 9.3.4.2<br>Table - 2, 9 & 11 to 23 |
| <b>Group 8 and 9</b>  | Informal Heritage Consideration – <i>Structures not on the RPS or NIAH</i>                               | Section - 9.3.4.3<br>Table - 3 and 24        |
| <b>Group 10 to 12</b> | National Inventory of Architectural Heritage – <i>Heritage near the site</i>                             | Section - 9.3.5<br>Tables - 4 to 7           |

### 9.3.4.1 Formal Heritage Designations

The site contains two nationally designated structures, the 'Chimneystack' and the 'Former Golden Vale Factory'. The NIAH Appraisal describes the site as:

*"A vast early industrial building complex, dominated by a massive limestone factory building, the monolithic scale of which casts a strong presence on the west bank of the River Shannon. It was originally built to make agricultural equipment and is now used as a dairy processing building. The 1872 edition of the Limerick City Ordnance Survey identifies this site as the Lansdowne Spinning Mill, which was built by the Russell family. It was later taken over by the Cleeve family who embarked on the construction of the condensory building. The factory's continued industrial use and dominating presence marks it as a landmark building within Limerick City, particularly as seen from Sarsfield Bridge."*<sup>9</sup>

| Group - 1    |               |                                                 | Refer to section 9.3.5.1 – Summary of Significance |                                                                                                           |                                                                                       |
|--------------|---------------|-------------------------------------------------|----------------------------------------------------|-----------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|
| RPS Reg. No. | NIAH Reg. No. | Name                                            | Location                                           | Description                                                                                               | Photo                                                                                 |
| 3264         | 21512059      | Former Golden Vale Chimneystack, Former Cleeves | North Circular Road, Stonetown Terrace             | Freestanding octagonal-plan red brick chimneystack, built c. 1860, as part of the vast industrial complex |  |
| 3265         | 21512053      | Former Golden Vale Factory, Former Cleeves      | North Circular Road, Stonetown Terrace             | Detached fifteen-bay four-storey stone factory building, built c. 1853                                    |  |

**Table 1** – Analysis Group 1 – Protected Structures - Table from Limerick's Record of Protected Structures.

<sup>9</sup> Cleeve's Condensed Milk Factory originally Lansdowne Spinning Mill, North Circular Road, O'Callaghan's Strand, Limerick, LIMERICK - Buildings of Ireland



Structures that are not included on the National Inventory of Architectural Heritage may still be of heritage value because they are considered as having some level of interest under one or more of the eight fields. Such structures may be afforded some degree of local consideration and protection. These would be listed on the Record of Protected Structures maintained locally. Limerick's Development Plan includes a record under section 3A covering the areas in and around the development site. This identifies the Chimneystack (RPS 3264) and Former Golden Vale Factory (RPS 3265), but does not identify any of the other structures or features within the development site.



**Figure 6** - Map extract from National Built Heritage Service website.  
Green line indicates the extent of a 'Townlands' district. The Flaxmill Complex is within Farranshone More  
Blue dots indicate assets included on the NIAH Record



**Cleeve's Condensed Milk Factory originally Lansdowne Spinning Mill, North Circular Road, O'Callaghan's Quay, Limerick, LIMERICK**



**Survey Data**

|                                |                                                                    |
|--------------------------------|--------------------------------------------------------------------|
| Reg No                         | 21512059                                                           |
| Rating                         | Regional                                                           |
| Categories of Special Interest | Architectural, Technical                                           |
| Previous Name                  | Cleeve's Condensed Milk Factory originally Lansdowne Spinning Mill |
| Original Use                   | Chimney                                                            |
| Date                           | 1850 - 1870                                                        |
| Coordinates                    | 157006, 157139                                                     |
| Date Recorded                  | 03/06/2005                                                         |
| Date Updated                   | --/--/--                                                           |

**Figure 7 - National Built Heritage Service record of Chimney.**

**Cleeve's Condensed Milk Factory originally Lansdowne Spinning Mill, North Circular Road, O'Callaghan's Strand, Limerick, LIMERICK**



**Survey Data**

|                                |                                                                    |
|--------------------------------|--------------------------------------------------------------------|
| Reg No                         | 21512053                                                           |
| Rating                         | Regional                                                           |
| Categories of Special Interest | Architectural, Artistic, Historical                                |
| Previous Name                  | Cleeve's Condensed Milk Factory originally Lansdowne Spinning Mill |
| Original Use                   | Factory                                                            |
| Historical Use                 | Mill (water)                                                       |
| Date                           | 1850 - 1860                                                        |
| Coordinates                    | 157055, 157138                                                     |
| Date Recorded                  | 02/06/2005                                                         |
| Date Updated                   | --/--/--                                                           |

**Figure 8 - National Built Heritage Service record of Mill.**

### 9.3.4.2 Flaxmill Complex Curtilage

The curtilage of the protected structures is the parcel of land that was in use for the purposes of the structure. In this instance the curtilage of the 'Former Factory' and 'Chimney Stack' is defined as the historic boundary of the Flaxmill Complex.

This grouping collects structures and features that are not identified as protected but that are within the curtilage of the protected structures and are contemporary to operation as a Flaxmill and / or Condensed Milk manufacturer. The value of these structures is assessed relative to the Flaxmill Complex as a whole and is set out in the Statement of Significance. When assessing the impact that arises from the proposals affecting these structures it will be with reference to their interest and significance relative to the Complex.

| Group 2 to 7 |                                                                                                     |                                                  |
|--------------|-----------------------------------------------------------------------------------------------------|--------------------------------------------------|
| Group        | Structure                                                                                           | Description                                      |
| 2            | Linen Store                                                                                         | Refer to section 9.3.8 – Summary of Significance |
| 3            | Boundary Wall                                                                                       | As above                                         |
| 4            | Quarry, Reservoir & Infiltration Gallery                                                            | As above                                         |
| 5            | Cheese Plant, Long building, warehouse and office - <i>Buildings Addressing North Circular Road</i> | As above                                         |
| 6            | Semi-detached houses, Office and Laboratory - <i>Buildings Identified for Demolition</i>            | As above                                         |
| 7            | Upper Reservoir                                                                                     | As above                                         |

**Table 2** - Analysis Group 2 to 7 – Curtilage Structures – Descriptions taken from the Statement of Significance.

### 9.3.4.3 Informal Heritage Consideration – Group 8 and 9

There are two distinct sites adjacent to the site of the Flaxmill complex. The site of the former Shipyard and that of the Former Salesians Secondary School. Neither of these sites are within Architectural Conservation Areas and none contain structures listed on the RPS or NIAH.

| Group 8 and 9 |                                            |                                                  |
|---------------|--------------------------------------------|--------------------------------------------------|
| Group         | Structure                                  | Description                                      |
| 8             | Former Salesians Secondary School          | Refer to section 9.3.8 – Summary of Significance |
| 9             | Shipyard Site, Boundary Wall and Warehouse | As above                                         |

**Table 3** - Analysis Group 8 & 9 – Structures near the site.

The development plan mentions the former Shipyard Site; it does not mention the Former Salesians Secondary School save to identify it as a key development site within the Cleaves Riverside Quarter and parcelled with the Cleaves Masterplan. While neither have formal designations, the Shipyard Site and Former Salesians Secondary School hold some potential to contain features that embody heritage interest.

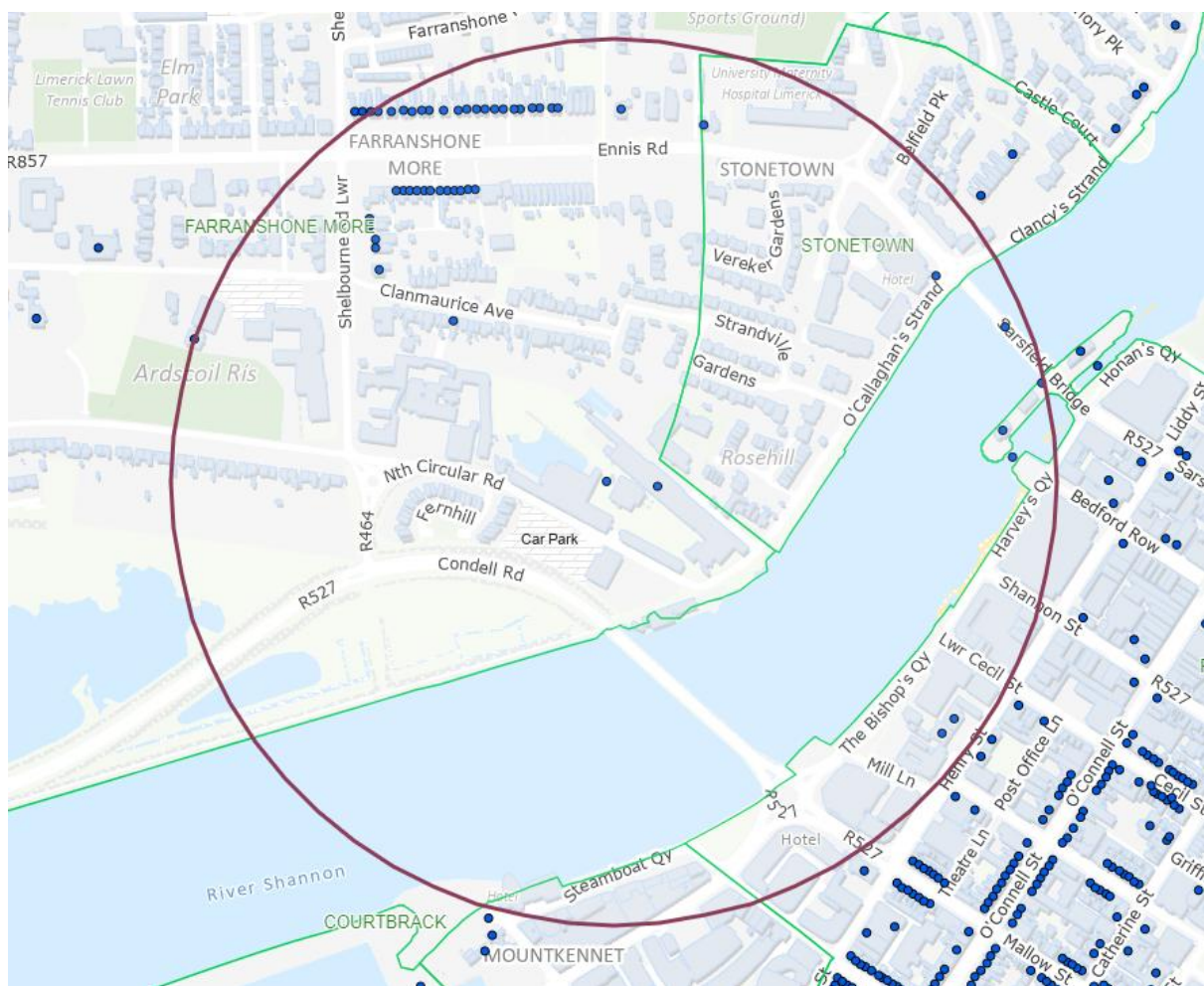
Both the Shipyard Site and Fernbank House are considered within the assessment with appropriate consideration afforded their specific areas of interest.

Shipyard Site – Largely cleared by 1990 the site's interest is limited to the buried archaeology and the fragments of upstanding wall that enclose the site. Where change is proposed, designs must describe intent.

Fernbank House – Specific consideration has been afforded the Former Salesians Secondary School within which there is an earlier structure known as Fernbank House. This was appraised by the Planning Authorities Conservation Officer and not added to the Record of Protected Structures. Refer to appendix 9.2 'Fernbank House - Architectural Heritage Assessment 2024'. The presence of fabric of the earlier house is noted to hold some potential to be of interest. Further detail is contained within appendix 9.3 Building Recordings for Fernbank House. Changes since the 1920s are such that the house is largely lost within later phases of development.

### 9.3.5 National Inventory of Architectural Heritage – Near the Site – Groups 10 to 12

The NIAH recorded 26no. sites within an approximate 250m to 300m radius of the development site boundary. Distance has been considered relative to the topography and potential for structures to be considered within the context of the development site.



**Figure 9** - Map from the NIAH showing a zone approx. 500m from the centre of the Flaxmill complex with protected structures identified as blue points.

Green line indicates the extent of a 'Townlands' district. Blue dots indicate assets included on the NIAH Record

| Group 10                                    |                 |                       |                                                                          |                      |                                                                                       |
|---------------------------------------------|-----------------|-----------------------|--------------------------------------------------------------------------|----------------------|---------------------------------------------------------------------------------------|
| NIAH Reg. No.                               | Name            | Location              | Description                                                              | Distance to Site (m) | Photo                                                                                 |
| 21512052                                    | Marylawn House  | Clanmaurice Avenue    | Detached two-bay two-storey house, built c. 1930                         | 40                   |    |
| Group of Houses along Lower Shelbourne Road |                 |                       |                                                                          |                      |                                                                                       |
| 21511014                                    | Landevin House  | Shelbourne Road Lower | Corner-sited detached five-bay two-storey red brick house, built c. 1890 | 120                  |    |
| 21511013                                    | Monaire House   | Shelbourne Road Lower | Semi-detached two-bay two-storey red brick house, built c. 1910          | 130                  |   |
| 21511012                                    | Killilagh House | Shelbourne Road Lower | Semi-detached two-bay two-storey red brick house, built c. 1910          | 140                  |  |
| 21511011                                    | West View House | Shelbourne Road Lower | Semi-detached two-bay two-storey red brick house, built c. 1910          | 145                  |  |
| 21511010                                    | Northesk House  | Shelbourne Road Lower | Semi-detached two-bay two-storey red brick house, built c. 1910          | 150                  |  |

**Table 4** - Protected Structures near the development site.



| Group 10 cont.       |                            |                                     |                                                                               |                      |                                                                                       |
|----------------------|----------------------------|-------------------------------------|-------------------------------------------------------------------------------|----------------------|---------------------------------------------------------------------------------------|
| NIAH Reg. No.        | Name                       | Location                            | Description                                                                   | Distance to Site (m) | Photo                                                                                 |
| 21512040 to 21512045 | Moyola Terrace, Six Houses | Ennis Road                          | Terrace, three-bay two-storey over basement red brick house, built c. 1900    | 180                  |    |
| 21512046 to 21512051 | Ardara Terrace, Six Houses | Ennis Road                          | Terrace, three-bay three-storey gable-fronted house, built c. 1925            | 180                  |    |
| 21511015             | Shelbourne House           | North Circular Road                 | Detached three-bay (five-bay deep) two-storey over basement house, built 1837 | 245                  |    |
| 21512054             | Post Box                   | O'Callaghan's Strand and Ennis Road | Freestanding cast-iron pillar box, erected c. 1930                            | 325                  |  |

**Table 5** – Protected Structures on the RPS near the development site.

| Group 11      |                        |                                                                                                                                     |                      |                                                                                       |
|---------------|------------------------|-------------------------------------------------------------------------------------------------------------------------------------|----------------------|---------------------------------------------------------------------------------------|
| NIAH Reg. No. | Name                   | Description                                                                                                                         | Distance to Site (m) | Photo                                                                                 |
| 21512010      | Sarsfield Bridge       | Five-span limestone road bridge, built between 1824-35, spanning the River Shannon joining Sarsfield Street and Ennis Road          | 330                  |    |
| 21512012      | Limerick 1916 Memorial | Freestanding carved ashlar limestone 1916 memorial, erected 1954                                                                    | 330                  |    |
| 21512013      | Limerick Boat club     | Detached T-plan two-bay single-storey with attic level clubhouse, built c. 1900                                                     | 275                  |   |
| 21512014      | Jetty                  | Harbour pier, constructed c. 1820, accessed via Sarsfield Bridge with corresponding jetty attached to Harvey's Quay, forming a lock | 260                  |  |

**Table 6** - Protected Structures on the RPS near the development site.



| Group 12      |                     |                                                                                                                                                                     |                      |                                                                                      |
|---------------|---------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|--------------------------------------------------------------------------------------|
| NIAH Reg. No. | Name                | Description                                                                                                                                                         | Distance to Site (m) | Photo                                                                                |
| 21517022      | The Bishop's Palace | Attached four-bay three-storey over basement red brick house, built c. 1775                                                                                         | 260                  |   |
| 21517021      | Hibernian House     | Attached five-bay three-storey over basement former house, built c. 1780                                                                                            | 260                  |   |
| 21517020      | The Red Church      | Detached rectangular plan Ruabon brick with Portland stone dressings former Presbyterian church, built between 1899-1901, in an Early English Gothic Revival style. | 325                  |  |

**Table 7** – Protected Structures near the development site.

### 9.3.6 Protected Views and Vistas

The Limerick Development Plan 2022-2028 offers consideration of views and vistas relative to the development site. The site is recognised as holding potential to be the focus for views. *“The unique location and prominence of existing site buildings suggest a unique opportunity for a taller building, providing views of and from the City.”* This underpins the stated potential for a tall building.<sup>10</sup>

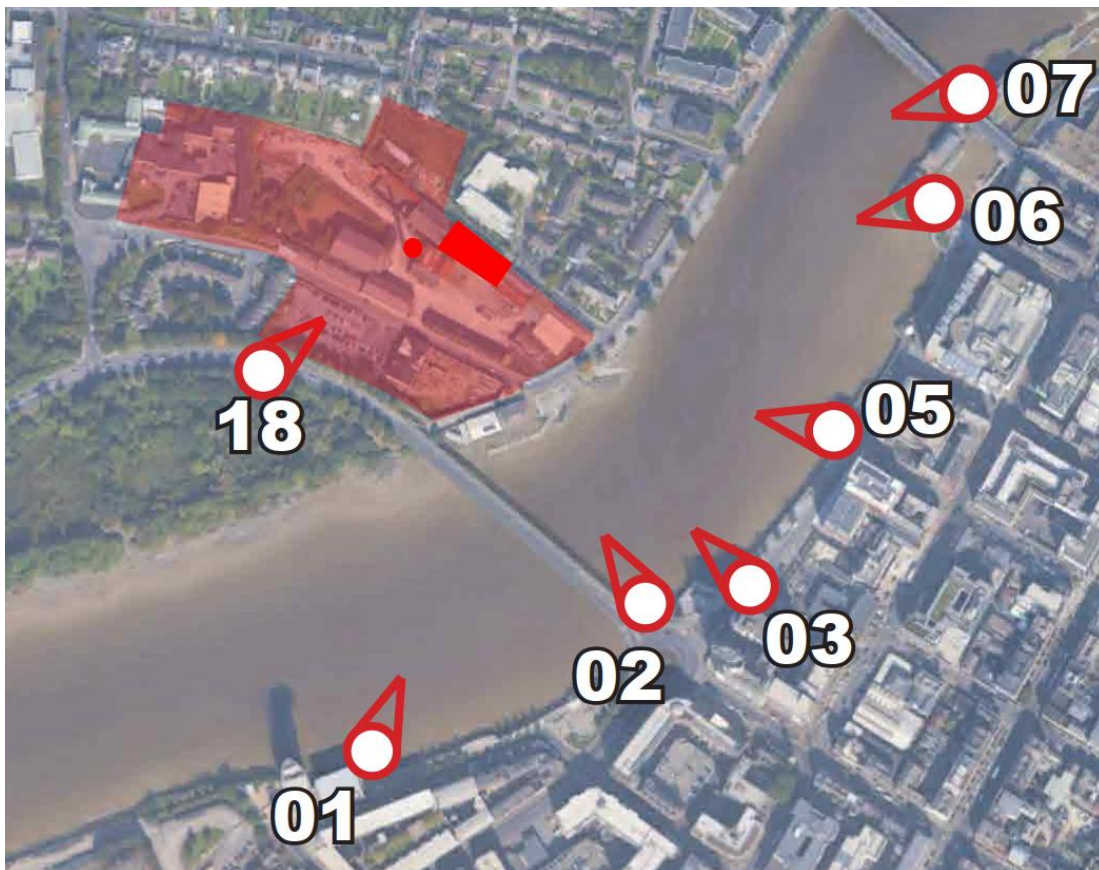
The Development Plan also identifies Objective EH O50 e) which notes that the *“form and structural integrity of the Protected Structure is retained in any redevelopment and that the relationship between the Protected Structure and any complex of adjoining buildings, designed landscape features, or views and vistas from within the grounds of the structure are respected.”*<sup>11</sup>

The site is bounded by an enclosing wall and, by its nature is inward-looking and does not offer aspect toward Limerick City. From within the main mill it was once possible to look to the north toward the old town but the enclosing extension and blocking up of the upper storey windows in the latter C20th has prevented this. There are no views available to the east. Some views are possible to the south. Key views toward the site are predominantly from across the River Shannon. These are identified as no's

<sup>10</sup> Limerick Development Plan 2022-2028, Volume 1, page 319.

<sup>11</sup> Limerick Development Plan 2022-2028, Volume 1, page 201.

01 to 07 in the TVIA assessment. From the east back of the Shannon the chimney and main mill are visible. In addition, view no.18 from the Condell Road offers a view into the mill yard.



**Figure 10** — Extract from the TVIA views identifying views no's. 1 to 7 and no.18. Flaxmill Protected Structures highlighted.

### 9.3.7 Application Site

The proposed application site (Phase II) is part of a phased development proposal for a significant city centre, regeneration area or Masterplan Site. This Masterplan Site is divided into four different phases of delivery as detailed in Section 1.6.3 in Chapter 1.0 Introduction. The overall Masterplan Site layout which illustrates the indicative layout of the subject site and adjoining lands in the ownership of the applicant is displayed in Chapter 1.0, Figure 1.4 and full details of the proposed development phases are provided in Chapter 2.0, Section 2.2.4. In addition to an in-depth assessment of the Proposed Development, this assessment takes a holistic approach and examines the wider Masterplan Site area, taking into account the proposed future phases of development based on the available information.

The Cleeves Riverside Quarter is a strategic brownfield site situated on the northern side of the River Shannon in Limerick City. The boundaries of the site are as follows:

- **Northeast:** Stonetown Terrace Road
- **Southeast:** O'Callaghan Strand
- **Southwest:** Condell Road (R527)
- **Northwest and West:** Salesian Primary School and the 'Fernhill' residential estate

The site is dissected by North Circular Road, extending between Shelbourne Road Lower and O'Callaghan Strand. The full extent of the planning application site is detailed in Figure 1.1 of the EIAR, which includes a map showing the boundaries of the application site. The map outlines the local area with key roads labelled, such as North Circular Road, O'Callaghan Strand, and Stonetown Terrace Road. The River Shannon is adjacent to the site, and the outlined area encompasses several buildings and open spaces, indicating the extent of the proposed development site.

The following lists the current buildings and their uses within the red line of the Cleaves Riverside Quarter Phase II application boundary:

1. **Flax Mill** (protected structure)
  - **Main Mill Blocks:** Vacant but intermittently used for public consultations, storage, seasonal events such as the "Scare Factory," and occasional Fire Service/Defence Forces training exercises.
  - **Attached Engine House and Ancillary Service Ranges:** Closed to the public; several semi-derelict and / or unsafe. Others used for storage.
2. **Chimney** (protected structure)
  - Tall brick industrial chimney associated with the former mill. It is structurally freestanding and has no active use other than as a visual landmark.
3. **Water-Treatment Remains** (upper terrace behind the mill)
  - **Water Tank House, Infiltration Galleries, and Associated Chambers:** Redundant water-supply structures now disused and fenced off for safety.
4. **Cold Store Building**
  - Early-20th-century concrete-framed warehouse to the west of the mill; currently vacant.
5. **Quarry & Reservoir**
  - Large flooded former limestone quarry forming an open water body (the reservoir) with steep rock faces; no formal use other than informal viewing by visitors and occasional training exercises by the emergency services.
  - Small pump-house and platform on the quarry rim – locked and unused.
6. **Boundary Walls and Gate Piers**
  - Substantial limestone and brick walls define much of the perimeter, punctuated by original arched gateways on O'Callaghan Strand and North Circular Road; these structures currently serve only as security and heritage features.
7. **Shipyard Site** (North Circular Road frontage)
  - Single-storey workshops, sheds, and hard-standing once used by a marine engineering company; now largely vacant with some short-term storage and parking.
8. **Stonetown Terrace Plateau** (north-east corner)
  - Level grassed area bordered by high masonry boundary walls; no buildings remain here, but the space is used informally for overflow parking and site access.

**9. Former Salesians Secondary School (0.9 ha parcel west of the quarry)**

- **School Block:** Repurposed as temporary accommodation for Ukrainian refugees.
- **Sports Hall:** Still functioning for indoor sports and community use.
- **Fernbank House:** Altered former dwelling now providing administration and ancillary space for the accommodation facility.
- Miscellaneous prefabricated stores and sheds to the rear – used for maintenance equipment.

In summary, the former Cleeves industrial site today contains a mixture of vacant industrial buildings some of which have temporary uses, others of which are derelict. These are all set within the distinct historic fabric of the former mill complex, quarry, and riverside yards.

**9.3.8 Summary of Heritage Significance**

The special significance of the site and surviving buildings is described in the front section of the Statement of Significance appendix 9.1.

As described in section '9.3.1.3 – Formal Heritage Designations' two of the structures on the proposed development site are included in the Record of Protected Structures and the National Inventory of Architectural Heritage. It should also be noted that Fernbank House at the Former Salesian Secondary School was appraised for inclusion on the RPS but found to lack necessary interest and quality for inclusion. See appendix 9.2.

In consideration of significance, where substantial interior fabric remains, there is greater interest and potential for higher significance. Features of interest could include original staircase, early timber joinery, plasterwork to ceilings, historic machinery and fittings, etc. While most of the flax phase fittings, furniture and equipment were disposed of in the 1870s, there are fragments of original fittings still present in the main mill. These have not been found in the other Phase I structures. These features will not fall within the scope of change that is proposed within Phase II. They will be further assessed to inform the detailed designs for Phase III which will ensure their retention as key features of the building's historic use.



**Figure 11 - Rare surviving flax phase features within the Main Mill.**



The NIAH description records the site to be a “*vast early industrial building complex*”, ensuring that interest and significance is not limited to the building but extends to the wider site relative to its intended purpose and function. The Statement of Significance describes each structure and details the significance relative to the overall early industrial complex, see appendix 9.1. The following table offers a brief summary:

| Building     |                                                                          | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Significance                     |
|--------------|--------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|
| no.          | Name                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                  |
| 01a.<br>01b. | <b>Main Mill - 1855</b><br>Rear Extension - 1955<br><i>NIAH 21512053</i> | <p><u>Summary</u> - Four-storey, 15 bay, ‘integrated’ flax spinning, with fireproof jack arch flooring and a fireproof spiral stair tower at its southern extremity. Constructed of locally quarried limestone and Belfast brick. Cut stone being used to dress the window and door openings. Some original 60pane wooden windows survive. Flax phase components almost entirely removed in the 1880s. Fabric, much altered with the addition of a rear extension covering over the original window openings.</p> <p><u>Condition</u> - Largely derelict. Upper portion structurally unsound and subject of imminent conservation led repair works. Insensitive changes include a 1950s lift obscuring two bays, rear extensions (in two phases) covering windows, late C20th changes including blocking up of windows and rear extension altering and obscuring the building.</p> | 1850s – High<br>1950s - Negative |

**Table 8** – Summary Description of Main Mill.



**Figure 12** – South aspect, principal elevation of the Main Mill.



| Building             |                                                                                   | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Significance                                                     |
|----------------------|-----------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------|
| no.                  | name                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                  |
| 11a.<br>11b.<br>11c. | <b>Weaving Mill-</b> 1855<br>Rear lean-to 1960s<br>1 <sup>st</sup> Floor and roof | <p><u>Summary</u> - Single storey, 13 bays structure attached to the flaxmill and used to weave linen. Built in the same form as the main mill with provision for a second storey that did not emerge until a later phase in the mid 1900s. Much altered with the addition of a portal roof structure in the 1950s and rear extensions.</p> <p><u>Condition</u> – Derelict. Ground floor storey lined out in plastic. First floor formed of 1950s concrete over original flat roof. Roof lantern no longer visible. 1950's portal frame clad in asbestos and dairy processing equipment present but largely unsafe.</p> | 1851 – High<br>1950s - Negative                                  |
| 11a.<br>11b.         | <b>Cold Store</b> - 1855<br>Lean-to - 1960s                                       | <p><u>Summary</u> – external front and rear walls, seven bays long. Front wall is of stone and appears to match the construction of the Weaving Mill. Possibly built to allow for the expansion of the weaving but not used. The rear wall appears much altered and may have been rebuilt to form the plant room extension linked to the upper reservoir.</p> <p><u>Condition</u> – Derelict. Currently an open structure without a roof.</p>                                                                                                                                                                           | Front Wall 1850s –<br>Hight<br>Rear Wall and Slab<br>– negative. |

**Table 9** - Summary Description of Weaving Mill and Cold Store.



**Figure 13** – North, upper aspect of the lean-to addressing the Stonetown Terrace site and a view from within.



**Figure 14** - Elevation addressing the mill yard.



**Figure 15** - Interior of the first floor, over the former Weaving Mill.





**Figure 16** - Aerial view showing the long lean-to at the rear of the derelict cold store below the upper reservoir.

| Building |                                       | Description                                                                                                                                                                                                                                                                                                                            | Significance |
|----------|---------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|
| no.      | Name                                  |                                                                                                                                                                                                                                                                                                                                        |              |
| 02.      | <b>Chimney Stack</b><br>NIAH 21512069 | <p><u>Summary</u> – Rebuilt 1853. Brick, 120ft, reduced from 150ft in 2000 to address concerns of instability. Capped with a stainless steel roof. Adaption to receive different flues during the operation of the site in the C20th.</p> <p><u>Condition</u> – Stable. In need of pointing and the refixing of a loose iron band.</p> | High         |

**Table 10** - Summary Description of Chimney stack.



**Figure 17** - Aerial views of the chimney from the south and north.



| Building             |                                                                         | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Significance                              |
|----------------------|-------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------|
| no.                  | Name                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                           |
| 03a.<br>03b.<br>03c. | <b>Boiler House</b> 1853<br>Gable Extension 1930<br>Side Extension 1947 | <p><u>Summary</u> – Large two storey with a barrel roof. Built in phases and adapted. Original masonry elements may have survived the 1869 fire that destroyed the engine and roof. The original barrel roofed structure had window openings that match those of the main mill. C20th extensions have greatly expanded the building form and concealed the east and south elevations. The large east extension is poorly built, a combination of found materials and lightweight steel with a single skin of masonry and metal.</p> <p>The interior of the original structure is open to the roof. No historic equipment is present. The later extensions are also largely empty.</p> <p><u>Condition</u> – Poor condition, semi derelict. The assessment in 2024 highlighted the deteriorated nature of the fabric and need for investigations and intervention.</p> | 1850s – High<br>1900s – Low /<br>Negative |

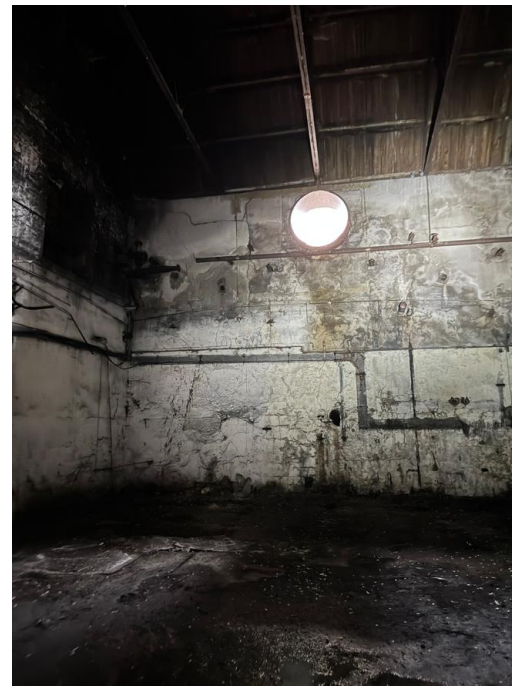
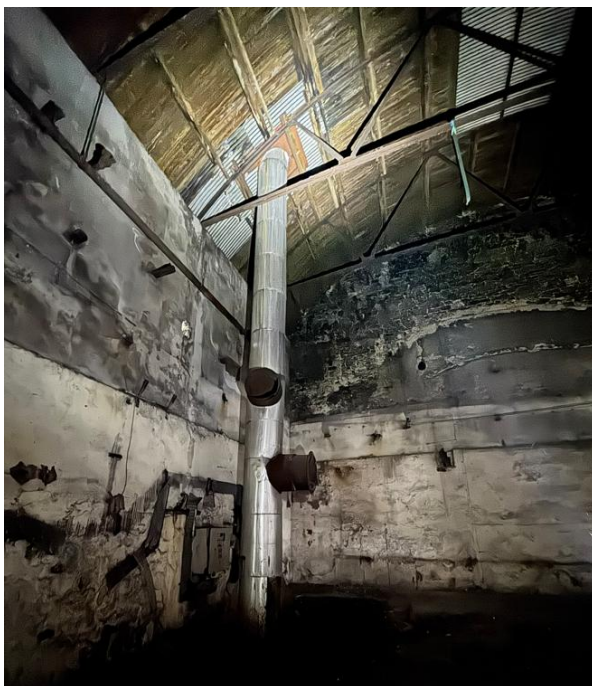
**Table 11** - Summary Description of Boiler House.



**Figure 18** – Rear (northwest) aspect of the former boiler house.



**Figure 19** – Front (southeast) aspect of the former boiler house, showing the 1930s extension.



**Figure 20** - Boiler house interior, empty of equipment, saturated and in poor condition.



| Building |                    | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Significance |
|----------|--------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|
| no.      | name               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |              |
| 04.      | Water Tank<br>1884 | <p><u>Summary</u> – Stone built plinth 1884, attributed to the Cleaves phase due to the loss of the earlier structure when the chimney collapsed. The building is of limestone and brick construction with a cast iron tank above. The front and side elevations are of high-quality masonry with the back elevation of rubble stone. The cornice continues around the whole of the building. The tank is set over the inner leaf of masonry. The building extends over four storeys with the lower storey visible from the reservoir. The ground floor of the building is used as storage space with windows that match those of the Infiltration Gallery alterations of the early 1950s.</p> <p><u>Condition</u> – Stable. 1950s adaption of the interior included strengthening. This is still present. Changes to the exterior have diminished the integrity of its form but the original structure is largely intact.</p> | High         |

**Table 12 - Summary Description of Water Tank.**



**Figure 21 – Watertank building viewed from the north aspect looking south.**

| Building |                             | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Significance                                 |
|----------|-----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|
| no.      | name                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                              |
| 05a.     | <b>Infiltration Gallery</b> | <p><u>Summary</u> – Arched stone and brick plinth constructed in 1851 over the excavations in the base of the quarry to form the reservoir. Piers in the wider reservoir hint at an intention to expand. Originally the dye-house would have been located over the gallery. This was of iron and glass. The upper structure was removed some time in the early C20th and replaced by an RC portal building around 1950 which was used as a cold store.</p> <p><u>Condition</u> – The plinth is in good repair. The later RC structure is deteriorating. A rear outrigger is becoming unstable. The building is presently used for storage.</p> | Plinth 1851 – High RC Portal Shed - Negative |
| 05b.     | Structure over, Cold Shed   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                              |
| 06.      | <b>Reservoir - 1850</b>     | <p><u>Summary</u> – Basin formed in the base of the quarry. This was central to the operation of the site for both processing of flax and later to provide water in the processing of condensed milk. It has become an ecological haven and important feature for the site.</p>                                                                                                                                                                                                                                                                                                                                                                | High                                         |

**Table 13** - Summary Description of Infiltration Gallery and Reservoir.



**Figure 22** - View across the reservoir to the rear of the infiltration gallery.





**Figure 23** - View across the reservoir from the rear of the Cheese Plant long building, looking north toward the quarry wall.



**Figure 24** - View across the reservoir from the rear of the water tank, looking west toward the quarry wall and the rear of Former Salesians Secondary School on the higher ground above.

| Building |                  | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Significance                                                |
|----------|------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------|
| no.      | Name             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                             |
| 07c.     | Linen Store 1855 | <p><u>Summary</u> – A simple single storey structure built of limestone and originally with a slate roof located at the east extent of the site. The external walls form the site boundary onto Stonetown Terrace and O’Callaghan Strand. Two false windows and rusticated quoins characterise the east gable. Queen post trusses present in part of the roof. The other part appears to have been adapted.</p> <p><u>Condition</u> – Adapted for storage. The roof has been renewed in profiled metal sheet. The internal elevation has been opened-up into a late C20th storage building. The masonry is in reasonable condition with some deterioration due to saturation.</p> | Linen Store - Medium<br>Late C20th<br>Structures - Negative |

**Table 14** – Summary Description of Linen Store.

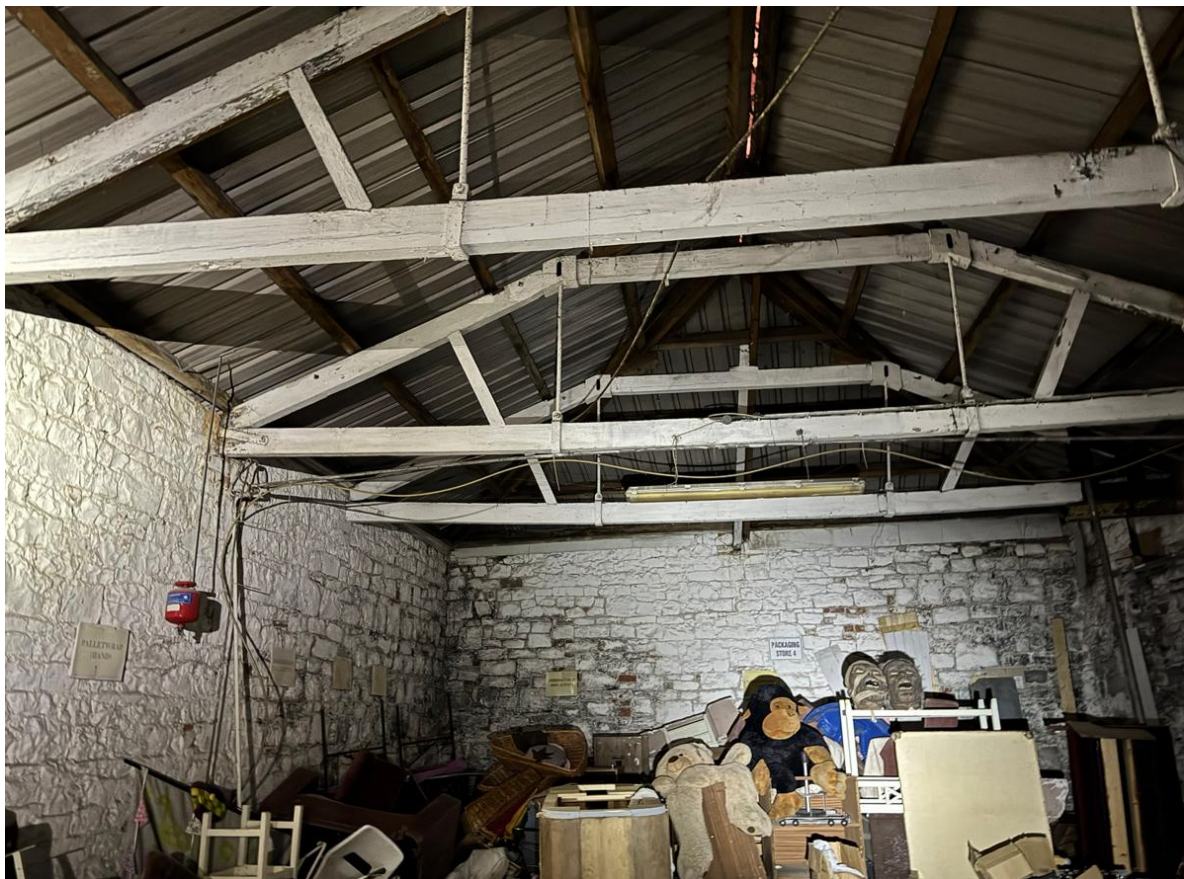


**Figure 25** - Former Linen Store, external walls as seen from O’Callaghan Strand.





**Figure 26** - Linen Store from above. Modern cold store abutting and the alterations to the northern cells in the form of a raised and replaced roof.



**Figure 27** - Interior of the former Linen Store, historic trusses above with modern roof coverings over.

| Building     |                                                                  | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Significance                                                                       |
|--------------|------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------|
| no.          | name                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                    |
| 07a.<br>07b. | Dairy Buildings<br><b>Office</b> 1855<br>Front Extension<br>1905 | <p><u>Summary</u> – Original 1850s building known as the ‘Counting House’ where the workers entered the site. An envelope of limestone, seven bays long and two storeys. Built as a heavy weight structure in the same form and materials as the main mill. Iron beams and columns appear to be from the same Belfast foundry and scaled to suit the smaller building.</p> <p>Later 1905 extension onto the mill yard has obscured the original counting house and closed the gap between the buildings linking the counting house to the mill. The extension seeks to emulate the earlier building although the windows are overly tall and narrow and the cornice is unconvincing.</p> <p><u>Condition</u> – Stable. Counting House – No original windows or doors survive. Nothing survives of the original interior. Upper floor has been adapted for storage. Ground floor has been opened-up to adjacent spaces and to allow vehicles to enter.</p> <p>Extension – Windows have been renewed. Alterations have been made for vehicle docking bays. Interior is largely altered to suit use as a storage space. Roof is lined with a tin roof with a spray foam coating.</p> | Office – High<br>1906 Extension –<br>Low<br>Late C20th<br>Structures –<br>Negative |

**Table 15** – Summary Description of Dairy Buildings, Office and 1905 Extension.

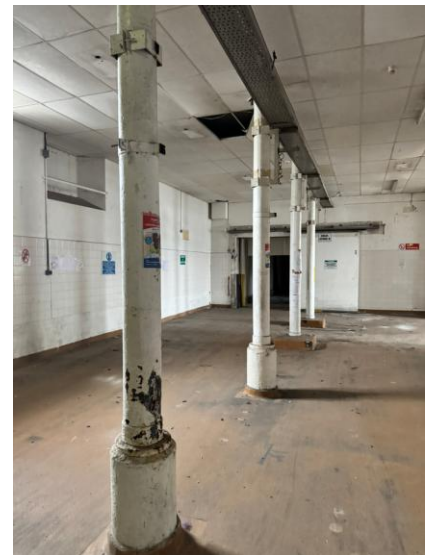
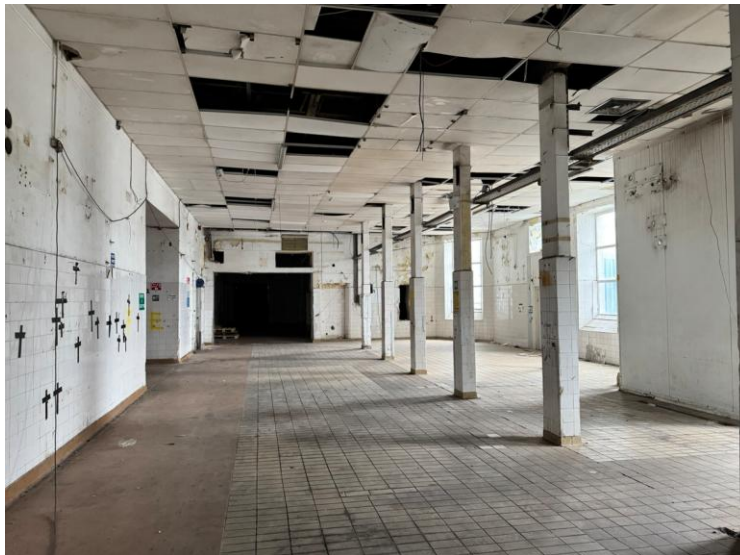


**Figure 28** – 1905 front extension to the former Offices and Counting House.





**Figure 29** – 1855 Office + Counting House addressing Stonetown Terrace. Original staff entrance 5th bay along.



**Figure 30** - Left - 1905 extension interior – Right - 1855 interior, cast iron columns and suspended ceiling hiding the vaulted floor. Both interiors stripped of original finishes and lined in cement, tiles and washdown finishes.



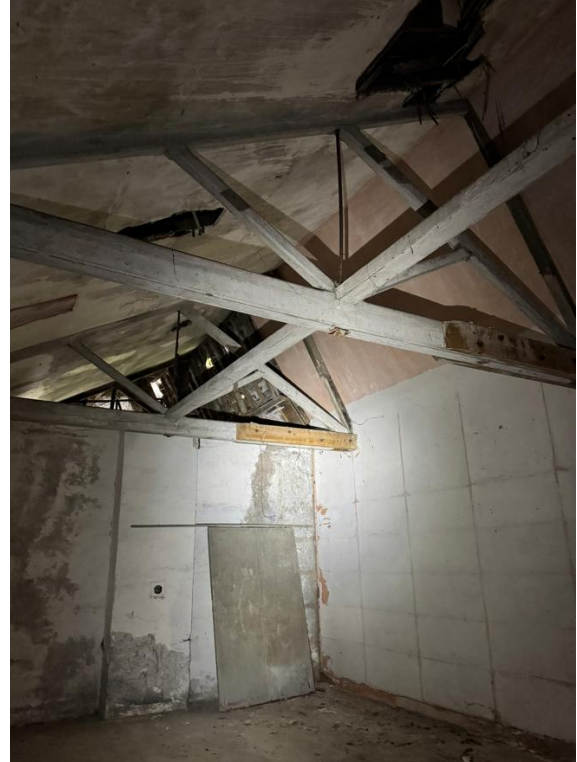
| Building     |                                                                | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Significance                                                                                                             |
|--------------|----------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------|
| no.          | name                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                          |
| 09a.         | Cheese Plant<br><b>Long Building</b><br>1853                   | <p><u>Summary</u> – Single storey shed once thought to have an asymmetrical roof with a north light. The external wall addresses the North Circular Road and retains a series of blocked window openings. The original building had a long narrow plan. This has been largely compartmentalised by phases of reconstruction.</p> <p><u>Condition</u> – Poor to derelict. The building is present in different forms. The west most room is derelict with the original floor collapsed. A few of the roof trusses remain with modern metal roof coverings in place. The adjacent rooms appear to have been rebuilt in the 1950s. Brick and concrete walls with steel windows define spaces known as the shop and cheese plant. These are semi-derelict. The entrance to the shop allowed access from the street. This was formed from a former window. Further to the east 1950s RC structures sit behind part of the earlier façade. This is largely obscured by render and paint.</p> | 1850s Masonry Façade – medium 1850s building (if still present) – medium Vaulted plinth – high 1950s Building – negative |
| 09b.<br>09c. | Cheese Plant<br><b>Shop</b><br><b>Packing Store and Office</b> | <p><u>Summary</u> – Masonry and concrete replacement of earlier structures to provide facilities for making cheese and a shop.<br/>At the east end is a c.1960 RC building known as the Packing Store and Office. This replaced the earlier historic structures that were present.</p> <p><u>Condition</u> – 09b. Partially derelict. 09c. Stable.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Negative.                                                                                                                |

**Table 16** - Summary Description of Cheese Plant.

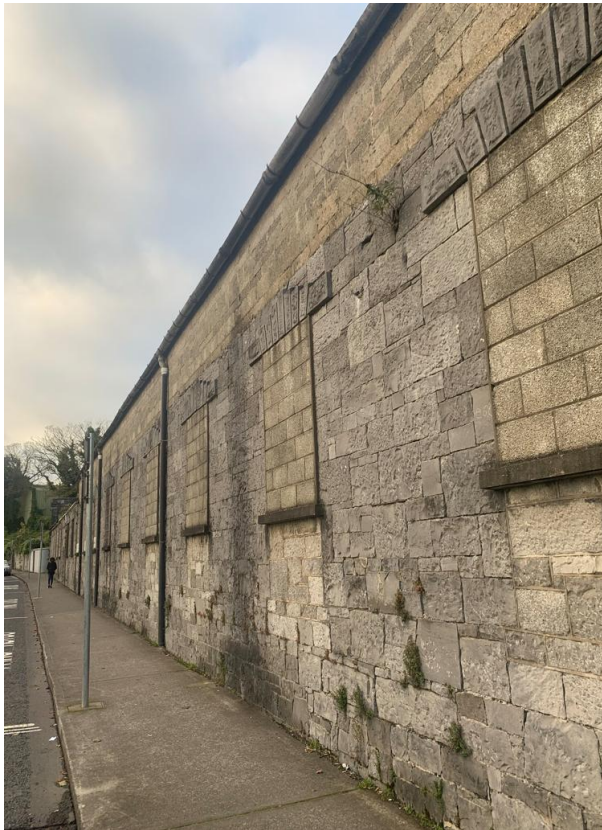


**Figure 31** - Aerial view of the Cheese Plant range, between the North Circular Road and the reservoir.





**Figure 32** - Left – Interior of the derelict room at the end of the long building. Right – Interior of the adjacent cell.



**Figure 33** - Left – Altered façade of the Cheese Plant range. Right – Element of former façade apparently incorporated into the 1960s warehouse structure.



*Figure 34 – Aerial of the Cheese Plant range as seen from the west.*



| Building |                               | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Significance                             |
|----------|-------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|
| no.      | name                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                          |
| 10       | Office and Laboratory<br>1905 | <p><u>Summary</u> – c.1900 single storey building, domestic in scale and aesthetic. Built masonry with smooth face red brickwork to the corners and window openings. The wall panels lined in rough cast render. Roof shallow pitch originally lined in slate. The windows are sliding sash. Steeply pitched roof porch projects from the middle of the southeast gable with decorative painted verge over a glazed timber frame. This building addresses the revised pedestrian entrance to the site which had previously served as the cart entrance. Two room extension added 1955. The addition is a rendered building with sliding sash windows, a chimney and slate roof.</p> <p><u>Condition</u> – Disused and in poor repair. The building does not relate well to the wider setting.</p> | <p>1905 – Low</p> <p>1955 – Negative</p> |

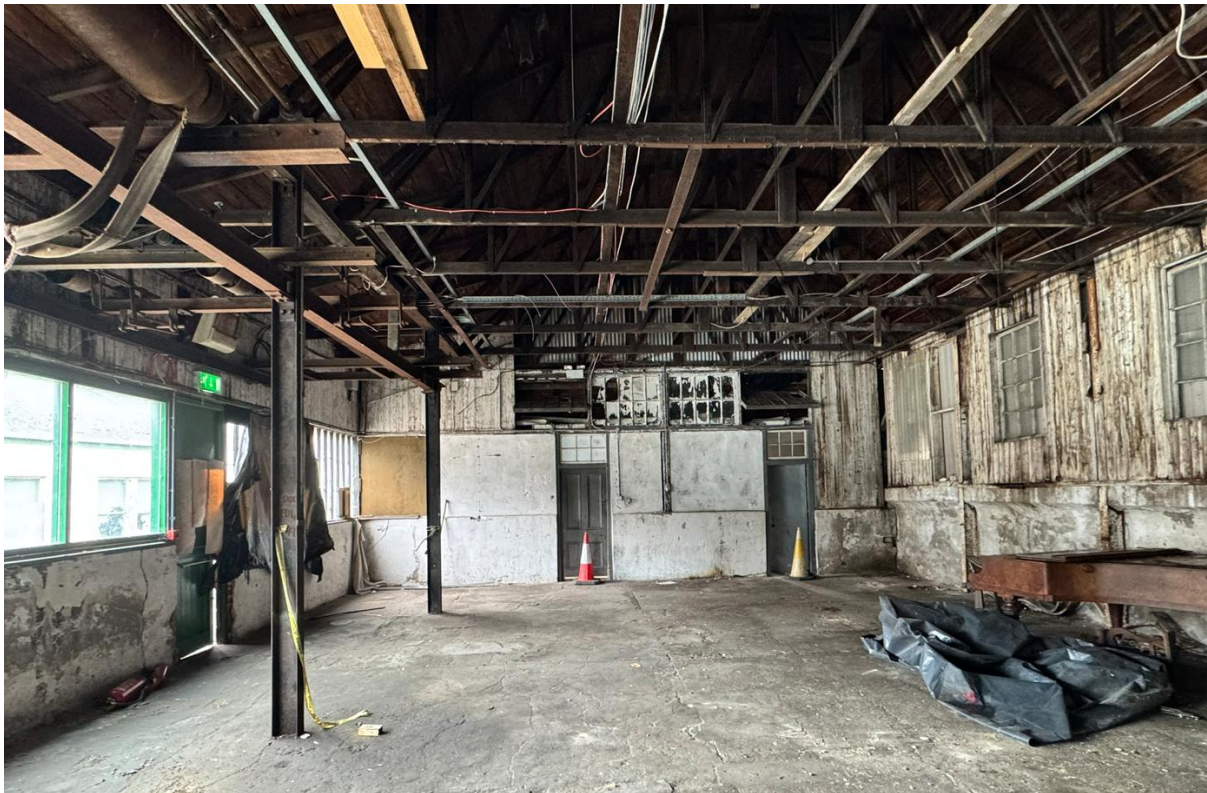
**Table 17** - Summary Description of Office and Laboratory.



**Figure 35** – Aerial of the former Offices and Laboratory.

| Building |                | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Significance |
|----------|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|
| no.      | name           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |              |
| 08       | Workshop 1947s | <p><u>Summary</u> – c.1947, long timber frame building with Belfast truss roof and ventilation lanterns. Built up against the pre-existing boundary wall, the outer wall has a masonry plinth set between steel posts. Multi-pane windows are set within a timber frame wall above although unseen from the street due to profiled steel cladding.</p> <p><u>Condition</u> – Poor. The building appears to be a lightweight structure intended to provide use possibly as vehicle storage. The building has been largely overclad in metal sheet disguising the extent of loss of timber cladding.</p> | Low          |

**Table 18** - Summary Description of Workshop.



**Figure 36** – Interior of the Workshop.



| Building |                                | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Significance |
|----------|--------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|
| no.      | name                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |              |
| 12       | <b>Upper Reservoir</b><br>1947 | <p><u>Summary</u> – The land above the site does not appear to have been used for the operation of the site in its first 100 years. The structures to the north of the Main Mill were built in the C20th during a phase of modernisation. Aerial photos from 1947 and 1951 show a series of concrete reservoirs partially set into the ground. By 1952 a pump house had been added.</p> <p><u>Condition</u> – Poor / Derelict – These are modern industrial structures that have not been in use for many years.</p> | Negative     |

**Table 19** – Summary Description of Mill Upper Reservoir.



**Figure 37** – Aerial of the upper reservoir.





**Figure 38** – View of the Stonetown Terrace plot from the upper reservoir.



**Figure 39** – looking across the tanks of the upper reservoir toward the rear of Clanmaurice Avenue.



| Building |                | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Significance |
|----------|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|
| no.      | name           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |              |
| 15       | Quarry 1833-55 | <p><u>Summary</u> – The quarry was almost certainly used as the source of building stone for the flaxmill. This allowed for the base to be lowered to form the reservoir. At the rear, the quarry floor formed a shelf that during historic operation of the site had buildings on it. These were demolished at some time in the second half of the C20th.</p> <p><u>Condition</u> – Disused and overgrown. Currently used as a building depot to support construction projects in the city.</p> | High         |

**Table 20** – Summary Description of Quarry.



**Figure 40** – back wall of the quarry with Former Salesians Secondary School above.





**Figure 41** – wall of the quarry toward the former cold store and upper reservoir.



**Figure 42** – view of the site looking over the quarry from the roof of the Former Salesians Secondary School.



| Building  | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Significance                                                          |
|-----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------|
| Mill yard | <p><u>Summary Description</u> – The yard is formed by an enclosing wall and characterised by the buildings that address it. Most of the buildings with a relationship to the yard are set at the edge of the complex with their inner aspect addressing the yard. The yard was originally characterised by the enclosing boundary wall, main mill, linen store, engine house and to the northwest the dye-house over the infiltration gallery (demolished 1950s) and the long sheds addressing the North Circular Road (largely demolished 1950s).</p> <p>The yard was gated and secure, accessed by horse and cart from the south with workers entering off Stonetown Terrace through the office / counting house. Developments encroaching into the yard continued broadly as follows:</p> <p>1890s the Office and Laboratory</p> <p>1906 - two storey addition to the range known as the Dairy Buildings.</p> <p>1930s - Workshops</p> <p>1930s – Engine House, lean-to additions</p> <p>1947s – Engine House large extension</p> <p>1950s</p> <ul style="list-style-type: none"> <li>• Replacement of the dye house with a cold store over the infiltration gallery plinth</li> <li>• lean-to range stepping into the yard</li> <li>• replacement of the long building with an RC Office and packing store</li> </ul> <p>1970s – silo bases and concrete across the yard</p> <p>1990s – single storey cold store between the Dairy Buildings and former Office and Lab.</p> <p><u>Condition</u> - The mill yard as found today is substantially impacted by the creeping additions of the C20th. The loss of the late C20th surfaces and furniture reduces the historic sense of the space.</p> | <p>Varies</p> <p>As a space – high</p> <p>Fabric – low / negative</p> |

**Table 21** – Summary Description of Mill yard.



**Figure 43** – aerial view of the mill yard.



**Figure 44** – aerial view of the site from the east.



| Building |                                       | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Significance             |
|----------|---------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|
| no.      | name                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                          |
|          | <b>Boundary Wall</b><br>1850s – 1900s | <p><u>Summary</u> – Elements of wall not forming parts of building facades. Typically built of random rubble with coursing possibly indicating phases of construction as the wall was increased in height. Some adaptations to upper sections of the wall where concrete has been used. Capping of cement. Former cart entrance off O'Callaghan Strand closed up.</p> <p><u>Condition</u> – Stable although often saturated. Altered in places. In need of pointing and renewal of capping.</p> | Varies – Medium and low. |

*Table 22 – Summary Description of Mill Boundary Wall.*

| Building |                                    | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Significance                |
|----------|------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|
| no.      | name                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                             |
| 14.      | <b>Semi-detached Houses</b> - 1854 | <p><u>Summary</u> – 1854, the houses are set back from the street and cut into a shelf in the rock. The back gardens are similarly terraced. The buildings are of two storeys with rendered façades, interlocking concrete tiles roofs and deep overhanging eaves.</p> <p>Each is of three bays with a central entrance. The windows are 2 over 2 horned sliding sashes over projecting stone cills. The rear walls are buff bricks laid in Flemish bond with 6 over 6 sliding sashes. The rear first floor elements are horizontally boarded with timber casement windows and a tin roof. The west house is substantially intact in form and material. The east house has been much altered although still retains its plan form.</p> <p><u>Condition</u> – Both houses are vacant and in poor condition although the fabric is robust and structurally sound. The west has not been well maintained and has suffered from occupation by squatters. The east has been modernised in phases resulting in loss of historic features.</p> | West – Medium<br>East - Low |

*Table 23 – Summary Description of Semi-detached Houses.**Figure 45 – Rear of the houses.*





**Figure 46** – Aerial view of the house with Former Salesians Secondary School above and the reservoir behind.



**Figure 47** – Interior of the north (right hand) house.



In addition to the structures within the flaxmill complex, there are two other buildings within the development; Former Salesians Secondary School and the Warehouse on the Shipyard Site. The Shipyard Site is also contained by a boundary wall.

| Building |                                                   | Description                                                                                                                                                                                                                                               | Significance     |
|----------|---------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|
| no.      | name                                              |                                                                                                                                                                                                                                                           |                  |
| 16.      | Former Salesians Secondary School<br>1880 – 1990s | <u>Summary</u> – Substantially a 1950s, 1970s and 1990s building complex with the remnants of a 1880s villa subsumed.<br><u>Condition</u> – Disused. Fabric is stable with some localised deterioration. Building is not up to current standards for use. | none             |
| 13.      | Warehouse<br>Shipyard Site<br>1990                | <u>Summary</u> – 1990s RC warehouse<br><u>Condition</u> – Unknown. Likely stable.                                                                                                                                                                         | negative         |
|          | Shipyard Site Boundary Wall                       | <u>Summary</u> – A mixture of historic and late C20th walls. Fragments of former building facades, now much reduced and stone boundary walls. Changes in concrete.<br><u>Condition</u> – stable, poor, in need of repair                                  | low and negative |

**Table 24** – Summary Description of structures adjacent to the Mill complex.



**Figure 48** – Aerial of former Salesians Secondary School.



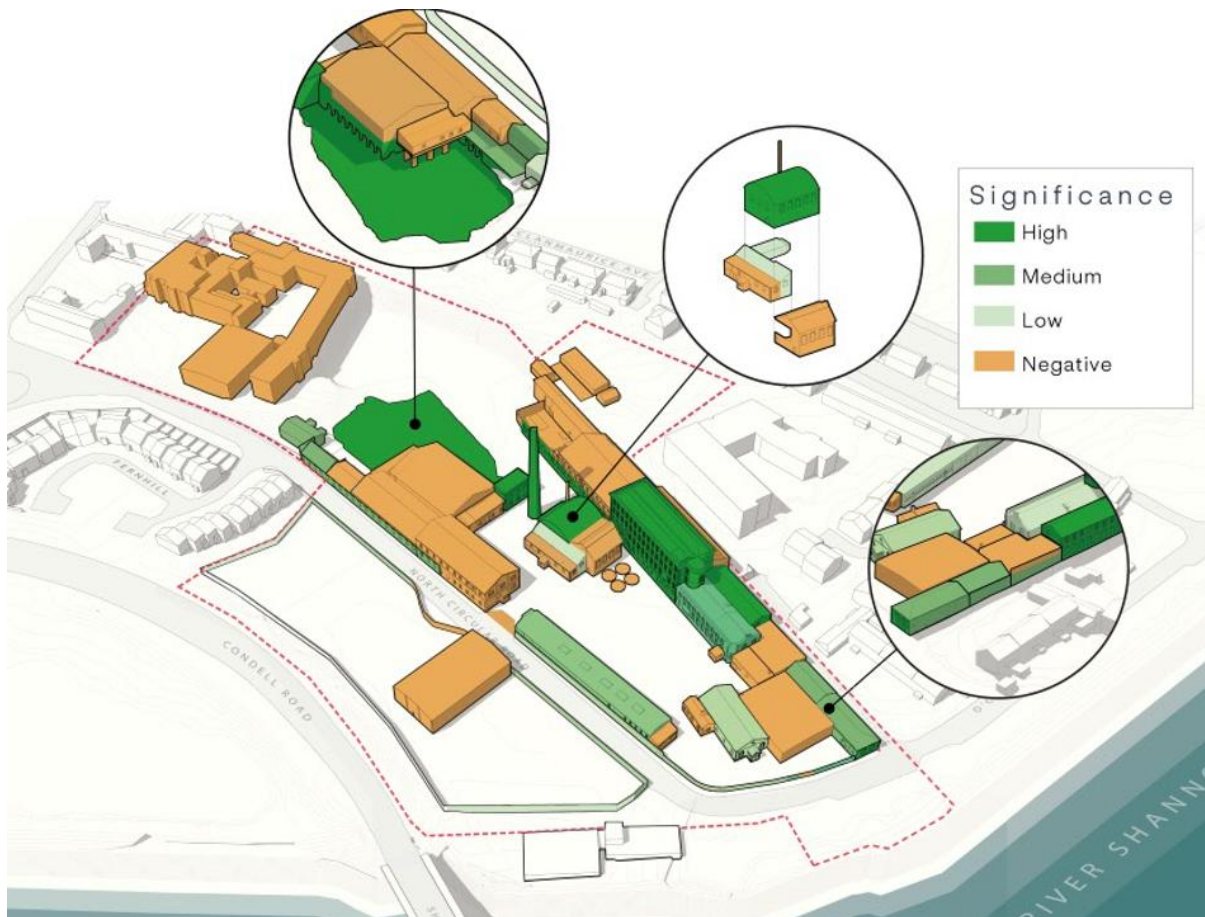


**Figure 49** – Aerial of former Shipyard Site.



**Figure 50** – View from within the former Shipyard site looking toward the warehouse.





**Figure 51** – Summary of Significance, extract from the Statement of Significance, fig.7.

## 9.4 CHARACTERISTICS OF THE PROPOSED DEVELOPMENT

### 9.4.1 Masterplan Site

The Cleaves Masterplan is a significant development that aims to integrate historic buildings and industrial heritage while creating a mixed-use area that includes residential, commercial, educational, and cultural spaces.

#### Buildings Development Scope

- **Residential:** New residential and PBSA in a heritage setting.
- **Commercial Offices:** Development of commercial office spaces.
- **Educational:** Adaptive reuse of historic buildings for educational facilities.
- **Cultural/Visitor Use:** Spaces for cultural and visitor activities.

#### Public Realm Development Scope

- **Enhancing Engagement with the City:** Opening up the Flaxmill site to the river, offering a new riverside vantage point, and activating the Shipyard site edge with water-related boating uses.

- **Celebrating Industrial Heritage:** Organizing the Quarter around heritage elements such as the Flaxmill buildings, Engine House, Chimney, Water Tank House, Infiltration Galleries, Reservoir, and Quarry.
- **Creating Vibrant Public Spaces:** Establishing a vibrant public realm at the heart of the Quarter that links diverse character areas and forms a spine connecting the Riverside to the Reservoir/Quarry.
- **Strengthening Connections:** Enhancing connections to the city for pedestrians, cyclists, and boaters, with potential for a mobility hub connecting public transport on Condell Road with facilities for shared bikes and scooters.
- **Permeable and Inviting Quarter:** Enhancing neighbourhood and urban connectivity through pedestrian and visual linkages from Condell Road to the Flaxmill site and from upper Salesians and Stonetown Terrace sites to the Reservoir.
- **Sustainable and Resilient Design:** Designing with sustainable initiatives and optimizing massing for quality internal and external spaces, with a diverse range of uses.
- **Public Space Proposals:** Creating a strong public realm around accessible urban spaces, defining connected urban spaces with a strong identity, and creating a necklace of open spaces with distinctive urban character.

The characteristics of the Masterplan are described in section 1.6.1 and 2.2.1 – 2.2.4 of this EIAR. This identifies the phased approach to development across the Masterplan site and the target development outlined for Phases III and IV. For the purposes of this assessment, Phase III is notable for its focus on the Flaxmill site and projected reuse of the historic structures.

Phase IV is notable as a major commercial development on the former Shipyard site. This reflects the City's Development Plan which invites a gateway building on the site.



**Figure 52 – Use Principles, extract from the Illustrative Masterplan - Vision Document.**

#### 9.4.1.1 Masterplan Phasing

Section 2.2.4 of this EIAR sets out the Masterplan Phasing. This assessment offers a summary of the potential impact of Phase I, III and IV. It offers detailed consideration of the impact of Phase II.

#### Summary of Conservation and Reuse Strategy in Phases (refer to ADR Appendix E):

##### 01. Flax Mill

###### 01a. Main Mill – 1855

Phase I - Conserve and Repair, upper floor and roof.

Phase II – no works proposed

Phase III – Retain and Reuse

###### 01b. Main Mill, Rear Extension c.1865, rebuilt 1955 and later.

Phase I – Removal of roof and upper walls to permit consolidation and repair of the upper storey.

Phase II activity - Peel back - Demolish rear extension to ground; reveal the rear elevation of the Main Mill to permit improved access for repair within Phase III.

##### 02. Chimney Stack - 1853

Phase II - No works proposed

Phase III - Conserve and Repair

##### 03. Boiler / Engine House

###### 03a. Boiler House – 1853 and 1900

Phase II - No demolition activity proposed.

Phase III - Conserve and Repair / Retain and Reuse

###### 03b – Gable Extension - 1930s

Phase II - No works proposed

Phase III – Peel back

###### 03c – Side and Gable Extension - 1947

Phase II - No works proposed

Phase III – Peel back

##### 04. Water Tank Building – 1851 / 1884

Phase II - No demolition activity proposed.

Phase III - Conserve and Repair

##### 05. Infiltration Gallery

###### 05a. Infiltration Gallery Plinth – 1850-1855

Phase II - No demolition activity proposed

Phase III - Conserve and Repair / Retain and Reuse



05b. Infiltration Gallery – Cold Store Shed c.1955 and 1960s

Phase II – No demolition activity proposed

Phase III – Peel back

**06. Reservoir** – 1850-55

Phase II – Retain and Reuse - Proposals to reinvigorate reservoir context as a new public open space.

**07. Linen Store & Offices / Dairy Buildings**07a. Offices - 1855

Phase I – Localised opening up to permit safe access for repair of the Main Mill.

Phase II - No works proposed save for minor consolidation of the gable where the former linen shed is removed.

Phase III – Conserve and Repair / Retain and Reuse

07b. Dairy Building - 1905 – Extension onto front of Offices

As 07a.

07c. Linen Store - 1855 – Demolish with Mitigation and Reuse

Phase II - Linen Store, southeast element - General demolition including roof, walls and slab. Retention and reuse of external walls onto Stonetown Terrace and O'Callaghan Strand.

Linen Store, northwest element - Much altered single storey building between the linen store and Offices. Later C20th flat roof and shallow pitched roof structure to be demolished. Wall onto Stonetown terrace to be partially retained.

**08. Workshop** – c.1930s

Phase II - No demolition activity proposed

Phase III – Demolish

**09. Cheese Plant / Packaging/ Store** (Long Building)09a. Long Building Fragment - 1853 (Cheese Plant)09b. Shop – 1853 façade / 1940s building and roof09c. Packing Store – 1947

Phase II - No demolition activity proposed.

Phase III – Demolish, Retain and Reuse façade

09d. Offices – 1960s / Fragment of 1853 façade

Phase II - Demolish. Retain historic façade.

Demolition of c.1960s reinforced concrete frame building. Retention of the surviving fragment of an earlier stone built single storey element that addresses the North Circular Road.

**10. Office & Laboratory Building** - 1910

Phase II – Demolish with Mitigation

**11. Weaving Mill / Cold Store**11a. Weaving Mill - 1855

Phase II - No demolition activity proposed

Phase III - Conserve and Repair / Retain and Reuse

11b. Weaving Mill Rear lean-to – 1960s

Phase II – Peel back and Reuse

11c. Weaving Mill – First floor and truss roof 1947 / 1951

Phase I – Remove dangerous materials and make safe to permit repair of main mill

Phase II - No demolition activity proposed

Phase III - Peel back and Reuse

**12. Upper Reservoir** - 1947

Phase II - Demolish - Proposal to demolish concrete water tanks and range of plant buildings.

**13. Warehouse / Shipyard site** – c.1990

Phase II – Remove and Redevelop - Proposal to demolish 1990s reinforced concrete structure.

**14. Houses** - 1854

Phase II – Demolish with Mitigation - Proposal to demolish to permit development of the site.

**15. Quarry** – pre 1850s

Phase II – General clearance. No demolition of historic structures proposed. Removal of 1960s piers and building waste from within the basin

**16. Former Salesians Secondary School** – Fernbank House c.1880

Phase II – Demolish with Mitigation

**Mitigation**

Building Recording has been carried out to the following buildings as part of the Phase II scope of work.

Phase II

07. Linen Store - single storey sheds inclusive of the office gable

10. Admin and Labs

14. Semi Detached Houses

16. Fernbank (discrete part of Former Salesians Secondary School)

A schedule of fabric worth salvage has been prepared for Fernbank House (9.3.8) and the Semi-Detached Houses (9.3.7). This is contained at the back of the Building Recording Report. Refer to appendix 9.3. Figure 53. Below, illustrates an example of recording for salvaged material to inform proposals for reuse. This was recorded to enable its reuse as part of the Phase I repair work.

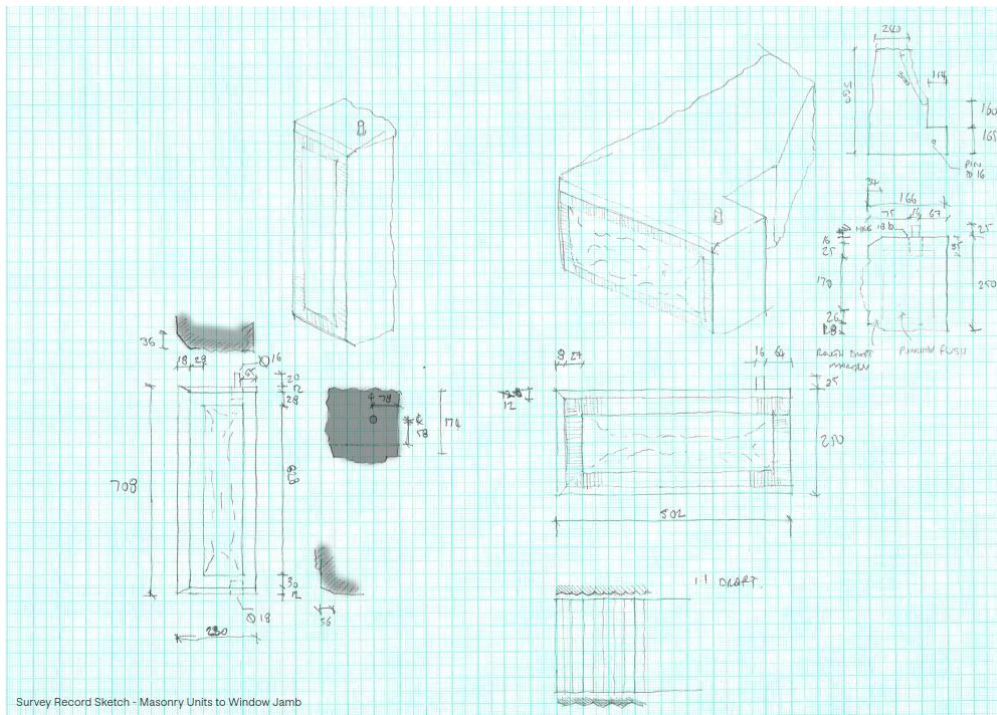
Phase III – Recording is proposed to support the detailed designs of proposals for reuse.

03 – Engine House

05 – Infiltration Gallery

08 – Workshop Building

09a – Cheese Plant (surviving fragment)



**Figure 53** – Images from salvage survey record prepared as part of Phase I works. Example of future approach for Phase II.



## 9.4.1.2 Heritage Protection Masterplan Context – Development Plan Policy

**Limerick Development Plan 2022-28** sets out the following:

**Volume 1 Written Statement**<sup>12</sup> - The former Flax Mill site is identified within the Cleeves Riverside Quarter as a strategic consolidation site. It is a key brownfield site (3.3.1.3) identified as having potential for hosting a tall building (3.4.2.4 and CGR O9) and a cluster of buildings of varying heights. (Table 3.2). It is identified as one of the key urban sites defined by its industrial past (Table 3.2).

The Cleeves site is identified as site no.22 and described in Volume 2 as “MASP supported Cleeves Riverside Campus, Brownfield Consolidation Site, Potential for 250 units over lifetime of Plan, Site flood design/ mitigation works”.<sup>13</sup>

**Volume 3A** – Record of Protected Structures for the Metropolitan District of Limerick identifies the Chimney and Factory in its list.<sup>14</sup>

**Volume 6 – Accompanying Strategies** - The ‘Retail Strategy’<sup>15</sup> describes the redevelopment of the Cleeves site within the wider urban development plan. It describes the mill site within the broader footprint of the ‘Cleeves Riverside Quarter’ and sets out the objective for a *“Proposal 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, which will result in focused compact City growth. This funding will be used to kick-start development on the site and to restore the protected buildings.”*

Under table 7.1 and 7.3 it identifies the Cleeves site as ‘OP 1’ naming it “Cleeves Riverside Campus” and describing its purpose as *“The campus development will comprise a largescale mixed use residential and office, education and cultural/ visitor attraction on a brownfield site zoned City Centre”*. The ‘Building Height Strategy for Limerick City’<sup>16</sup> makes many references to the Cleeves site with the masterplan.

Key to the plan is the compact growth of the city which focuses on redevelopment of existing sites. Cleeves is among the most important of the sites seeking to combine the benefits of cultural heritage with reuse achieved through development. The strategy identifies the preparation of a masterplan.

Within the document it describes the Cleeves site as *‘transformational’* and identifies the objective for a conservation-led reuse of the protected structures and anticipating the need for new development of greater height and enhanced density:

*“The former ‘Cleeves’ Site at Stonetown Terrace sits at a highly visible gateway position. According to the Plan this location will require a long-term strategy to address this large development site and recommends that this site be considered for an Urban Science and Technology Park at the edge of the City Centre. - It is envisaged the site will comprise a large scale mixed-use residential and office, education and cultural/visitor attraction. The development will include conservation and adaptive reuse*

<sup>12</sup> [Limerick-Development-Plan-Volume-1-Written-Statement-including-Variation-No-1.pdf](#)

<sup>13</sup> [Volume-2a-Limerick-City-and-Suburbs.pdf](#)

<sup>14</sup> [3a-record-of-protected-structures-metropolitan-district-rev-a\\_0.pdf](#)

<sup>15</sup> [Retail-Strategy-for-Limerick-Shannon-Metropolitan-Area-and-County-Limerick.pdf](#)

<sup>16</sup> [Building-Height-Strategy-for-Limerick-City.pdf](#)

*of a number of protected structures and other historic buildings. The site will provide public spaces and improved connectivity via a pedestrian bridge constructed across the River Shannon. It is recognised that there is potential for greater height and density, while creating a landmark city gateway.”*

#### 9.4.1.3 Heritage Protection Design Strategy

In line with ICOMOS principles, the strategy for reuse has been developed and informed by a Conservation Philosophy<sup>17</sup>. Section 2.0 of the Architectural Design Report sets out a ‘Masterplan Conservation Strategy’ which provides a framework against which proposals for change can be developed with due regard for heritage significance. The Architectural Design Report also includes focused studies where change is proposed and statements on design principles that describe the influence of the sites character and heritage on the proposals.

The masterplan identifying the proposed reuse of significant structures and the intervention of new buildings where considered tolerable. The scheme also proposes a scope of demolition that extends across the whole development site, beyond the curtilage of the Flaxmill site. Refer to Architectural Design Report, section 2.5 ‘Demolition Strategy’ and to drawing ‘CRQMP-FCBS-ZZ-XX-DR-AA-0130’.

#### 9.4.2 Application Site

The characteristics of the project are described in section 2.5.1 of this EIAR.

The proposals are for the redevelopment of parts of the mill complex and adjacent sites. This will require demolition of several structures and the redevelopment of some of the development plots identified within the masterplan. The application site encompasses the Flaxmill Site but does not include proposals for reuse of the historic buildings. This will be detailed as part of a future application for Phase III.

##### 9.4.2.1 New Development

**1. Flaxmill** - The Flaxmill area is a central character area adjacent to the river. The design approach includes creating a vibrant public realm that links diverse character areas. The Flaxmill space will feature a canopy serving as a gateway and a flexible "urban living room" for Limerick City, hosting concerts, festivals, and public events.

**2. Chimney** - This centrally located area will be enhanced to celebrate and integrate key heritage landmarks such as the iconic chimney and water tower. The design will create a network of connected public spaces that highlight the site's industrial heritage.

**3. O’Callaghan Strand** - The development proposed on the site of the Linen Store is called ‘O’Callaghan Strand’ after the road it addresses. The proposals are for a new mixed use building of 4/5 storeys. It will provide 21 apartments, with an open roof structure accommodating communal open space and plant. At ground floor commercial space will activate the mill yard and allow for interaction between the building and public realm.

**3. Stonetown Terrace** - Primarily residential to respond to the neighbouring residential context. The Stonetown Terrace buildings will form a space that overlooks and frames the chimney and water tower.

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<sup>17</sup> Burra Charter, articles 2.2, 6, setting out a practical framework for decision making.

The design will include a network of accessible routes linking these sites to the public realm around the reservoir. This will entail the demolition of the Upper Reservoir on Stonetown Terrace (including two concrete water tanks, pump house, and liquid storage tank).

**4. Salesians** - The Salesians area will feature residential developments with a crèche. The new building materials will have a focus on brick and metal cladding materials. The design will offer permeability with accessible routes linking to the public realm around the reservoir. Development will require the demolition of the former Salesians Secondary School buildings inclusive of Fernbank House.

**5. Quarry and Reservoir** - Provision of student residential bed spaces and residential units. This area will be opened-up to the city and riverside, creating new urban spaces. The design will integrate diverse roof profiles and a richly textured backdrop using brick and secondary materials. Demolition of residual piers from the basin of the reservoir.

**6. Shipyard** - A new shared accessible hub for walking and cycling will connect Condell Road across the Shipyard site into the heart of the new Riverside Quarter.

These developments aim to create a cohesive and vibrant new quarter that celebrates the site's unique industrial heritage and enhances connectivity and public realm.

#### 9.4.2.2 Development and Demolition

The scope of changes within Phase II include:

**Demolition** – refer to section 2.5.2 of this EIAR. Also, section 2.5 Architectural Design Report and drawing 'CRQMP-FCBS-ZZ-XX-DR-AA-1901 - Heritage and Conservation Strategy' which is included within appendix E of the same report.

**Landscape and Levels** – Adjustments to align with flood risk. Refer to section 2.5.9

**Reservoir** – Retention as an ecological feature central to the redevelopment of the site. Refer to section 2.5.9.

**New Build** – Replacement building on the site of the Linen Store. Refer to sections 2.5.3 'O'Callaghan Strand Zone' and 2.5.5.

**Boundary Wall Alterations** – refer to section 2.5.8 and the Architectural Design Report, specifically section 2.5.

**Future Proposals** - Future applications for the adaptive reuse of the Flaxmill buildings, Phase III, will include detail on repair, reuse and removal of fabric informed by an intricate understanding of the buildings Special Interest<sup>18</sup>. The Phase III designs will propose the measures necessary to secure the sustainable reuse of the complex and to preserve its heritage significance.

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<sup>18</sup> Special Interest – as defined under 2.5.4 of 'Architectural heritage protection – Guidance for planning authorities 2011'.



## 9.5 LIKELIHOOD OF SIGNIFICANT EFFECTS

The character and significance of the historic structures and features within and directly in the vicinity of the proposed development site have been analysed in accordance with the criteria set out by the National Inventory of Architectural Heritage to provide context for assessing the heritage impacts of the proposed development. These criteria were established by the Granada Convention of 1985 and were codified by the Planning and Development Act, 2000.

Those categories are as follows:

Architectural; Historical; Archaeological; Artistic; Social; Cultural; Technical and Scientific

Chapter 1.0 of the EIAR sets out the assessment criteria for the assets described in this chapter.

Refer to Volume II Appendix 9.1 for the Statement of Significance which describes the structures within the curtilage of the Flaxmill Complex. Within the assessment several of the buildings have been identified as imposing negatively on the significance of the Flaxmill complex. Where structures are identified as holding 'negative' significance the potential for impact is typically identified as 'positive' on the basis that their removal improves both the legibility of the site and the potential for the buildings holding positive significance to be the subject of reuse.

In advance of considering the likelihood of significance of the proposed Phase II development, it is pertinent to evaluate the Masterplan proposal, as ultimately Phase II unleashes the potential of the site to facilitate future phases including the reuse of existing buildings on the site.

### 9.5.1 Likelihood of Significant Effects – Masterplan Development

The development will be delivered in phases. Refer to section 1.6.3 of this EIAR.

Phase I – Heritage Works

Phase II – Residential & Public Realm

Phase III – TUS Campus

Phase IV – Shipyard Site

The following descriptions are included to provide an understanding of the Masterplan Development relative to phasing. Each is described here with an assessment of effects included under 9.6 Cumulative Development Effect' to avoid duplication.

**Phase I** – The consolidation and repair of the upper portion of the main mill to protect it from collapse. This is described as the first phase of repair that will be progressed ensuring other important historic structures within the complex are secured. See 2.2.4 of this EIAR. Phase I effects are assessed under 9.6.6.1

**Phase II** – Refer to 9.5.2 below.

**Phase III** – The adaptive reuse of the historic buildings as part of a new educational campus will give rise to both adverse and beneficial effects. The removal of 20th-century accretions, which currently obscure and diminish understanding of the early industrial complex, will have a certain, direct, positive effect, improving legibility of the original structures.

The proposed approach anticipates that derelict elements will be carefully dismantled, with retention and reuse of significant historic fabric wherever feasible. While the detailed design is still to be advanced, the submitted Conservation Strategy (Phases I and II) demonstrates a consistent commitment to maximising retention and minimising loss. The strategy indicates the proposed reuse of the retained buildings with repair, consolidation and proportional adaption as required to bring them back into use.

Some moderate adverse effects are likely, arising from necessary alterations to accommodate new functions within the complex. These effects are anticipated to be localised and outweighed by the significant positive effects associated with the long-term safeguarding, repair, and sensitive reuse of the retained buildings.

Of particular note is the activation of the mill yard as a public space. This will have a permanent, significant beneficial effect, enhancing accessibility and ensuring sustainable future use.

Phase III effects are summarised under 9.6.6.3.

**Phase IV** - Beyond the mill complex the shipyard site will become host to a key gateway building that is intentionally taller than the flaxmill. This is intended to respond to the site's prominence next to the Condell Road, Shannon Bridge and on the west bank of the river opposite the city<sup>19</sup>. Limerick Development Plan 'Key Growth Areas and Height – Map 3.15' identifies the Cleeves site and adjacent shipyard site and upper site (land above Cleeves) as "*Known areas for height development*".

The Condell Road and Shannon Bridge are noted to be the "third entrance point [to the city] from the west" with the site noted to have potential to reinforce the character of the area as a gateway to the city. (P101).

The projected use, accommodation and building massing for the site show three blocks with a tower rising at the south extent of the site. The tiering of the southernmost block steps back from the mill complex rising to a tower on the west edge immediately adjacent to the Condell Road.<sup>20</sup> The vision is for a dynamic multi-use scheme set around a shared public realm. The diagrams show common axis across the Shipyard and Cleeves sites offering views in and out. Specific detail is yet to be developed such as the treatment of the residual walls of the former warehouse buildings that occupied the site prior to their demolition in the 1990s. The redevelopment of the Shipyard site holds considerable potential to greatly improve the site bringing more people into contact with the early industrial mill complex. As with the detailed proposals prepared to date, the design development for Phase IV should be informed by the site's heritage interests and developed to respond positively.

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<sup>19</sup> [Building-Height-Strategy-for-Limerick-City.pdf](#)

<sup>20</sup> Cleeves Riverside Quarter – Illustrative Masterplan – Vision Document

### Policy Context

Limerick recognises the enhanced impact that can occur with tall buildings in close proximity to Protected Structures. (*Tall Buildings – Heritage Impact p.239*). Cleeves Site is seen as within the Inner-City Area and a key gateway site making it suitable to accommodate buildings of height, (p.118) i.e. tall buildings that exceed traditional norms and that in so doing become either recognisable in their own right or generating intensity due to their presence within a collection of tall buildings. Policies TB3 and TB5 have been identified as relevant to the site. Heights of new buildings will need to be informed by their potential to impact the heritage significance of the protected structures. A focused section of the document considered height on the site noting that “a ‘catch all’ recommendation on height - is not applicable” likely due to the ambitions for this key site within a complex setting.

### Mitigation

The vision document sets out a project that is to be a key gateway to the city. It will provide substantial economic benefit to the wider site and city. Of most relevance to the cultural heritage of the site is its placement at the heart of the development. New and additional mixed uses housed on the shipyard site will greatly enhance access to and appreciation of heritage as a key definer of place making.

Effects - Phase IV effects are summarised under 9.6.6.4

## **9.5.2 Likelihood of Significant Effects – Phase II Application Site**

Analysis of the new buildings in the setting is contained within section 9.5.2.5. The following sections consider the direct impacts on fabric.

### **9.5.2.1 Group 1 – Protected Structures**

#### Summary Description

The Phase II proposals do not describe any works to the chimney. The works to the main mill are concerned with the C20th lean-to on its northeast aspect. Section 3.2 of the ADR describes the area of the building and provides some analysis. Partial removal of the roof and upper walls of the lean-to are to be undertaken to permit the consolidation and repair of the main mill. The further removal of the first-floor slab (c.1990s) and lower walls of the lean-to (c.1950s) are proposed to permit safe access to the upper site known as Stonetown Terrace and to permit access to repair the fabric of the main mill. The design described the consolidation of the ground to form a road and path to the upper site. This will allow for vehicles and fire access.

#### Assessment of Effects

The chimney and Flaxmill are the most significant structures on the site. The chimney was the subject of consolidation and repair work about a decade ago. It was reduced 30ft in height and a stainless-steel cover installed on its top. The Main Mill is in a very dilapidated state of repair. Phase I of the works will entail the consolidation and repair of the upper storey and roof of the mill, the first in a series of repair contacts seeking to secure the historic structures in preparation for adaptive reuse. The removal of the rear structure will allow access to progress repairs to the mill and the reinstatement of fabric lost to insensitive past repairs. It will be an initial step to conserve and reinstate the mill to its former appearance. Chimney - No works are proposed to the chimney meaning that the outcome will be neutral.



Main Mill - The scope of fabric to be removed / demolished does not constitute the substantial loss of significance and does not trigger consideration under an assessment of exceptional circumstances. The rear lean-to of the Main Mill is highlighted as a structure of negative significance within the statement of significance. **The removal of the rear lean-to to will constitute a likelihood of a direct, positive, moderate, local and permanent effect.**

#### 9.5.2.2 Group 2 to 7 – Curtilage Structures

This group represents the setting of the mill yard and features that fall within the curtilage of the Protected Structures. Their value is assessed relative to the complex as a whole and is referred to in the context of several of the mill structures. Section 3.0 of the Architectural Design Report provides context and detail on the proposed changes that are to be made to each of the buildings. In some instances this also offers an indication of initial thoughts on changes that will arise under future phases. When assessing the impact that arises from the Phase II proposals it will be with reference to their interest and significance relative to the complex.

Analysis of the visual impact of the new buildings in the setting is contained within section 9.5.2.5.

#### Group 2 – Linen Store

##### Summary Description

The proposals are for the removal of the roof and demolition of parts of the existing 1850s linen store building. The external facades are to be retained and a new 4/5 storey building of mixed use built over the footprint of the building. Refer to section 7 of the Architectural Design Report (ADR) which describes the proposal in detail. Section 7.9 of the ADR sets out the strategy for the retention and integration of the historic façade addressing O'Callaghan Strand and Stonetown Terrace. This section also includes details on strategies and methods for repair of the historic wall reflecting a conservation-led approach.

##### Summary of Proposals

Proposals are for the demolition of parts of the existing single storey structure and the retention of the existing historic façades addressing Stonetown Terrace and O'Callaghan Strand. The retained wall will form parts of the envelope of a new building which will be a new mixed-use building, built on and over the site of the existing Linen Store. The following is an abridged description taken from the Architectural Design Report.

*Massing articulated to integrate the building into its context and address the different conditions the heritage and riverfront contexts create. Seeking a coherent architectural language that can sit comfortably next to the flax phase structures and frames the mill yard. The proposals are seeking to create a civic presence on the riverfront reflecting the language of the site. The building is to be of masonry with a dark grey brick for the ground floor, with a lighter brick above. Grey tones have been chosen to tie in with the limestone of the Flaxmill and curtilage wall. Metal elements differentiate the roof volume. The pitched roofs are grey and are inset from the facade lines emulating the façades of the mill buildings. Metal window frames and railings will be a rich olive-green/grey tone referring to some of the tones evident in the historic mill site. The ground floor will have more glazing and provide a degree of activation to the landscape and Mill yard.*

### Design Mitigation

The retained single storey facades will form the external walls of the ground floor rooms. Set below the roof level of the main mill, the building's height and massing have been balanced to respond to the setting. The architecture has been designed to reflect the rhythm of the mill building. Its materials have a language that reflects the tones and solidity of the millscape. It is important to also consider the new building relative to its setting and relationship to the mill yard. Greater connection and place making will result from the formation of the new building.

### Assessment of Effects

The single storey structure of the former Linen Store holds significance as an original element of the site. The store has been adapted for use with historic openings being closed and new openings formed. The northwest element of the store appears to have been substantially altered with the southeast end more intact. The aspect of the structure addressing the mill yard have been much altered. The roof coverings and floor are modern. A few of the original queen trusses survive.

The removal of the surviving roof and mill facing walls of the former linen store will result in the permanent loss of historic fabric. The building's interiors are already lost to past changes. The building currently has no positive use. The retention and reuse of the externally facing walls will maintain the key connection between the mill and the public realm.

The loss of historic fabric is not the intended method by which heritage is conserved. Balancing the broad benefits to the protected structures and mill complex as a whole will be achieved by implementing the changes and measures set out in the ADR which include:

- retention and integration of the historic façades into the fabric of the new building
- repair of the historic wall reflecting a conservation-led approach
- reuse of salvaged material from the mill complex to support repair of historic fabric
- new building form set below the roof level of the main mill
- height and massing of the new building balanced to respond to the setting
- architectural treatment of the façade to reflect the rhythm of the mill building
- materials reflect the tones and solidity of the millscape
- place making through engagement with the setting and millyard

The scope of fabric to be removed / demolished does not constitute the substantial or total loss of significance and does not trigger consideration under an assessment of exceptional circumstances. The more significant fabric of the Linen Store has been identified for retention and reuse. ***The retention and reuse of the historic façades and redevelopment of the plot will constitute a moderate, local and permanent positive effect.***

## Group 3 - Mill Yard / Flaxmill Plaza and Boundary Wall

### Summary Description

The yard is formed by an enclosing wall and characterised by the buildings that address it. Most of the buildings with a relationship to the yard are set at its edge of the complex with their inner aspect addressing the yard. The yard was originally characterised by the enclosing boundary wall, main mill, linen store, engine house and to the northwest the dye-house over the infiltration gallery (demolished 1950s) and the long sheds addressing the North Circular Road (largely demolished 1950s). The yard

has been increasingly encroached upon throughout the C20th. This started in 1905 with the addition of the Office and Laboratory building and continued with the workshops in the 1930s, extension to the engine house and later still ancillary structures onto and between buildings. The ground was extensively lined in concrete most probably in the 1960s with sections renewed as they wore out. Lorry docking bays and similar structures were added abutting buildings. Toward the end of its industrial use, silo bases were added to the south of the engine house along with other modern industrial furniture such as pipe brackets, pipe gantries and cables between buildings.

### Summary of Proposals

The proposals are summarised in the Landscape Design Booklet. The following is an abridged description in the words of the Landscape Architect.

*A new dramatic open square allowing spatial scale and distance to appreciate the Flaxmill building. Space that will allow for large scale flexible use and for enlivenment of the space and buildings through the implementation of shelter under tree canopies affording a sense of a retreat to shade and shelter. Alignment of the trees and planting traces a direct connection between river and reservoir as an important green infrastructural line of planting, raingardens and civic amenity. All affording connection to the Flaxmill structures. 'Flaxmill Square' has a potential to become an important space for city events and a cultural hub. The design aims to generate a lively feel and human scale even when there are no events happening on the plaza by implementing scaled spaces and detail such as tree planting, seating, water, lighting, furniture and paving details. New space associated with active frontage, both in meanwhile uses and when the masterplan is further developed will allow room for future exhibitions, cafés, restaurants, shops to spill onto the open space.*

*The design intent is to utilise and enhance the microclimate, to capitalise on the sunny exposition of the Flaxmill, with tree planting along the shadier southwestern facades as part of the Green Infrastructure Strategy. The wind mitigation is achieved through a combination of capitalising on existing building orientation, facade treatment and landscape features.*

The scheme will reflect the character of the industrial heritage, maintaining or reusing artefacts such as paving and metalwork where appropriate. Likewise, the characteristics of the colonising planting will be curated to maintain a sense of nature taking hold of a post-industrial environment. The Flaxmill landscape is not intended to become over sanitised and pristine. Colonising planting is supported by the use of permeable materials, crushed aggregates from site, lime mortars, limestone gravels, and sand.

Section 2.5 of the ADR sets out the extent and method for opening-up the Boundary Wall. The proposals are for a publicly accessible shared space, refer to ADR section 7.0 and the Landscape Architects proposals. Toward the southeast extent of the site the ground levels will be raised to align with flood mitigation measures. The boundary wall will be reduced in height but not wholly removed, its line and presence will not be lost. The lowered wall will form the leading edge of a series of stepped terraces responding to the flood risk. The historic cart entrance will be reinstated restoring a lost access route into the mill yard. These measures will allow for a visual corridor into the complex that has not been available before. The reinstatement of access at a pre-existing historic threshold will enhance significance.



The flood mitigation measures will occur within the existing public realm and extend into the Flaxmill site. The proposals describe the raising of O'Callaghan Strand and North Circular Road to a 1 in 200-year flood level of 5.7m with an allowance for climate change and freeboard. This raised level is intended to protect the site and surrounding areas from potential flood events, aligning with the principles set out in "The Planning System and Flood Risk Management – Guidelines for Planning Authorities" (2009). The proposed level is sufficient to enable the reuse of the site and its return to use. These measures are integrated into the overall design to ensure that the development is sustainable, safe, and resilient, enhancing the quality of life for residents while mitigating flood risk and preserving the natural environment.

#### Design Mitigation

**Landscape** - The proposals are to open-up the Flaxmill site to the river, offering a new riverside vantage point and to create an enhanced and accessible public promenade. This will allow the mill yard 'Flaxmill Square' to be established as the core public space of the Cleaves Riverside Quarter. The landscape strategy is to create a necklace of open spaces with distinctive urban character, linking from the upper sites to the riverside with the Plaza at its heart. The plaza will support creative workplaces for public use activated by mixed ground floors of the adjacent buildings.

The landscape treatment will take a lead from the historic finishes. Recovered materials like cobbles will be reused in the new surfaces. The designs have set out an intention to utilise salvages masonry and other materials to enhance the richness of the Plaza by rescuing materials taken from the demolition of the older elements of the site.

These plans aim to create a cohesive and vibrant public realm that integrates the historical and natural elements of the site, promoting sustainable and community-focused development.

**Structure / Boundary Wall** - The proposals are seeking to retain and reuse industrial period fabric. The reinstatement of the former cartway as the primary pedestrian route is of substantial value to the experience of the site. The retention of lower sections of the wall will preserve its alignment and ensure it is not erased. Its repurposing as a terrace edge will allow people to engage with it. The reuse of dismantled stone in the construction of the upper terraces will ensure retention of historic materials on site and within the complex. Phases of adaption and reuse consistent with the story of the building's past.

Flood mitigation in the form of raised levels will unlock the future resilience of the site. Should flood mitigation measures not be implemented, use of the site will remain constrained and positive reuse unlikely with public access would be unlikely.

The yard also addresses the Boiler House, Water Tank, Workshop and Weaving Mill. There is no proposal for change to these structures until Phase III.

#### Initial Assessment of Effects

***The proposed re-development of the mill yard to create 'Flaxmill Square' and changes to the southeast boundary wall will constitute a high likelihood of direct, positive, significant, local and permanent effects.***

#### Group 4 - Quarry, Reservoir & Infiltration Gallery

##### Summary Description

Within the Statement of Significance, the quarry and reservoir are described within sections 1 and 14. The Infiltration Gallery is described within section 5. The quarry and reservoir are set at the rear of the site. The quarry was a feature present at the time of the development of the Flaxmill having been opened for building stone used in the city. The reservoir was formed by the lowering of the quarry floor to form a basin and provide building stone used in the construction of the Flaxmill phase structures on the site. The reservoir was of specific value to flax processing and later an important source of water for industrial processing of milk. The ground at the north edge of the reservoir was recovered through the depositing of fill which enabled access and reuse of the rear of the quarry. In the early 1900s a series of structures were built across the quarry floor hugging the tall quarry face. These were demolished sometime in the latter C20th. The quarry is presently used as a construction storage yard with various building materials stored across the site.

The Infiltration Gallery was intentionally built over the reservoir to support flax processing which required material to be soaked and then worked. The existing building is formed of a stone and brick plinth of the 1850s with a reinforced concrete structure of the 1950s built in place of the earlier iron and glass structure associated with the flax and condensed milk phases.

##### Summary of Proposals

The quarry and reservoir will be adapted to support reuse and occupation by the public as part of a residential scheme. The quarry site will host three blocks of student accommodation, refer to section 8.0 of the ADR. The heights of the block are proposed to rise a storey in height with those nearest the main mill to be ground plus five storeys followed by a block of ground plus six and at the deepest part of the site, ground plus seven. The blocks are set apart with each set on a slightly different alignment to create interest and minimise the potential for negative visual impact. The block nearest the chimney and main mill reflects the primary alignment into the site established by the historic mill buildings. The blocks will be of brickwork with metal windows. Vehicular access extends to the rear of the blocks spacing the blocks away from the quarry face.

The reservoir will be addressed by a newly formed water's edge. This will encourage ecology and provide space for people to interact with the water and landscape. Landscape proposals describe opportunities for play and places to be immersed in the natural environment. Existing submerged piers have been identified for removal to allow for safe access into the water, refer to 3.4 of the ADR. These will be reduced in height to sufficient depth to remove hazards related to the use of the water for recreational purposes.

##### Design Mitigation

Infiltration Gallery – no works are proposed to this structure in Phase II.

Reservoir - Designs seek to provide public access into the depths of the site and create a shared landscape at the water's edge. The neglected environment will be cleaned and inappropriate materials removed. Useful historic masonry taken from the reservoir will be reused in the landscape scheme.

Quarry – Redevelopment will remove the use of the quarry as a building depot. Building set away from the quarry face avoiding impact to its legibility. The building designs have been articulated to minimise visual impact on the setting of the protected structures.

New Buildings, Form, Scale and Massing – The alignment of the first of the buildings is sympathetic to that of the main mill with its massing appearing in keeping with and subservient to the protected structures. The division of the three blocks and their different orientations reduce their combined massing. The first block is orientated in alignment with the mill range. The second and third block rotate away from this axis. The shift in alignment between the blocks reduces their perceived massing and adds interest for long range views into the site.

Building Materials – Refer to sections 4.0 and 5.0 of the ADR. The fabric of the student blocks has been selected to blend with the palette of the Flaxmill Complex offering a complementary addition within the early industrial setting.

#### Assessment of Effects

Historically, the quarry and reservoir have been used and adapted to meet the needs of the site. The proposals continue this theme, working with the fabric that is present and adding to it.

Changes are substantially concerned with development within the quarry. Very limited change is proposed to structures within the curtilage of the Protected Structures. As such, impacts will be mostly indirect.

Reservoir Piers – The scope of fabric to be removed does not constitute the substantial loss of significance and does not trigger consideration under an assessment of exceptional circumstances. The removal or reduction in height of the piers will result in the loss of historic fabric. No other historic fabric is identified for removal.

Views - The quarry and reservoir are concealed from view to all but those people who have a right to enter the site. Such views are only appreciated once users have moved past the water tank building. Some lines of sight are likely present from the end of the gardens of the properties built on the land above the quarry although appreciation of the quarry and reservoir is substantially from within the mill complex.

Change and Adaption – The proposed reuse of the quarry will not result in a change that will erode its special interest.

Use – The reuse of the quarry and opening-up of the site and reservoir will greatly enhance appreciation of the site.

***The proposed development in the Quarry will constitute a likelihood of direct, positive, moderate, local and permanent effects. The Infiltration Gallery will not be impacted.***

#### Group 5 – Cheese Plant - Buildings Addressing North Circular Road

##### Summary Description

The buildings along the North Circular Road are set behind a limestone façade of a building dating to Phase I of the Flaxmill complex. Much of the fabric behind the wall is thought to be of a later date. The building's most recent use was as the cheese plant, shop, packing store and offices. See section 9. of the Statement of Significance.



The shop and packing store are predominantly mid C20th structures built as replacements to the building that once occupied the site. At the end of the site, an original building is still present although now derelict and unsafe to access. This is bookended by a large wall that divides the working site from the adjacent semi-detached houses. This wall is of interest as it is of a grander scale than that of the adjacent structures and is likely to have been an early part of the boundary wall, possibly progressed before the final plans for the complex were resolved.

#### Proposals

In general, there are no works proposed to the historic structures within Phase II of the development proposals. The 1960s reinforced concrete building is to be demolished. Refer to 3.5 of the ADR. This structure was built in place of an earlier building that was substantially removed save for a short length of limestone single storey façade. The retained façade extends along North Circular Road where it is similarly retained with later structures behind. The proposals are for the previously retained façade to be kept. The removal of this building will allow for access on axis with the space between the chimney and water tank. The enhanced opening in this area will improve the setting of the engine house and other structures that address the mill yard.

The gable of the mid-century packing store will be exposed, and any necessary remedial works will arising as a consequences of the removal of the adjacent building, described within Group 6 will be carried out. A series of descriptions concerning the treatment and repair of historic fabric is included within section 7.9 of the ADR. Further to this the sample drawing package for Phase I works included within appendix D of the ADR exemplify the approach, level of detail, materials and standards that will be applied to consolidate and repair fabric exposed as a result of adjacent works.

#### Design Mitigation

The demolition works (described within Group 6) will focus on a mid C20th structure. Historic fabric will be retained, including the length of façade that is thought to be historic and that requires invasive investigation to establish its true construction. Exposed fabric will be consolidated, repaired and stabilised. This can be summarised as a cautious approach seeking the maximum retention of historic fabric.

North Circular Road Retained Façade –The historic façade is to be retained and consolidated. This will permit its reuse within Phase III and will form the street elevation of a new building as part of future proposals. Temporary measures will be implemented to enable its safe preservation. This assessment does not assess the effects of its reuse only the proposal for its retention and consolidation.

#### Initial Assessment of Effects

The retention of the existing structures unaltered will have a neutral effect. The removal of the 1960s building will allow for the opening up of the mill yard, improving the cohesion of the wider public realm and will greatly enhance the usefulness of the space.

The demolition of the reinforced concrete structure may result in historic fabric being revealed. Measures have been proposed to ensure this is stabilised and preserved until a future phase of work.

***The proposed demolition of the 1960s building to enhance the landscape and setting of the water tank, chimney and wider mill complex will constitute a likelihood of direct, positive, moderate, local and permanent effects. Historic fabric is not expected to be directly impacted.***

#### Group 6 – Buildings Identified for Demolition (*and not described elsewhere*) and new Landscape

##### Summary Description

The structures within the Flaxmill Complex identified for demolition include a range from different phases of development on the site. As set out in the Statement of Significance, structures of the mid and late C20th typically lack the heritage values of the Flaxmill and Condensed Milk phases. Fig.7 within the Statement of Significance identifies the majority of these structures as imposing negative significance. Within this group the structures of negative significance include:

- No.11b Weaving Mill lean-to 1960s blockwork plant building - section 3. of the Statement of Significance.

Refer to section 2.5 of the ADR and appendix E.

The assessment of their negative significance arises from several factors including:

- Obscuring Significance and Understanding – structures that intervened in the earlier building forms in a manner that has limited the legibility of their earlier form and function. This is typically the case where ancillary elements have been built up against earlier buildings. It can also arise from development where former use relative to the Flaxmill and Dairy complex can no longer be clearly understood.
- Eroding – Changes that have given rise to a loss of historic fabric through replacement of elements or whole buildings. This is most evident in the former weaving mill (now titled the Cold Store) and the Infiltration Gallery where the upper storey was entirely replaced in the 1950s resulting in the loss of the original iron and glass structure.
- Basis of Interests – structures from a period / phase that does not reflect the reasons for which the site and its structures hold cultural interest.

While these negative structures are within the curtilage of the protected structures, they do not inform its special interest. Their demolition cannot impose negatively upon them.

Within this group are two structures that hold positive significance. For the purposes of this assessment it is important to clarify that this group collects those structures that are identified for complete demolition and that are within the curtilage of protected structures although not specifically described on the RPS:

- 10. Offices and Laboratory 1910 - section 11 of the SoS – Low Significance
- 14. Semi-Detached Victorian Houses 1854 - section 12 of the SoS – Medium & Low Significance. *Refer to section 3.1 of the ADR*

Each of these are curtilage structures that inform significance of the protected structures. As structures embodying special interest, their complete demolition has the potential to result in a situation where 'exceptional circumstances' should be considered. Such circumstances may arise when heritage significance of protected structures is substantially lost and where the potential impact is unusually high

due to the nature, scale, or location of a development. So that the potential impact of their demolition can be assessed, these structures have been subject to detailed investigation including the preparation of Building Recording, refer to appendix 9.3. This enhanced investigation was undertaken to improve awareness of the age, phasing and significance of the buildings and their fabric. This included further research into their history and use. The findings have been captured in updates to the Statement of Significance and reflected the strategy for demolition, retention and reuse.

The Semi-Detached Houses retain some special interest, largely based in their joint form and as dwellings with a direct connection to the original operation of the Flaxmill for which they provided accommodation for the senior managers. The west of the two dwellings, while significantly dilapidated and unliveable, is more intact and retains original features. Such features been stripped from the dwelling on the right. These houses represent an interesting example of workers housing albeit very limited in their scope and built as a means to draw experienced managers to the business from the north where flax processing was a well understood industry.

The Office and Laboratory building was added to the site in 1890 as part of the technical enhancement of the processing of milk. It was placed at the pedestrian access into the site to allow for management of staff. As a structure it is simply built and utilitarian in form and plan. It has been much altered and is in a poor state of repair. Significance of this building is largely based in its function and the story of the sites operation and not in its architecture.

### Proposal

Demolition of selected structures:

- Weaving Mill lean-to and portion of upstanding ruined wall. *Ref 3.3 of the ADR*
- Offices and Laboratory – complete removal.
- Semi-Detached Victorian Houses – complete removal. *Ref 3.1 of the ADR*

The removal of these structures is proposed for the following reasons:

- To re-open the millyard / vista and access
- To allow for avenues of access through the site
- To create new thresholds into the site
- To remove low quality structures that inhibit future reuse
- To allow for the implementation of flood mitigation measures

The sum of these objectives is to allow for the positive reuse of the wider Flaxmill complex through the implementation of changes in areas of greatest tolerance and potential.

Flaxmill Square – refer to the description contained in the Landscape Design Booklet and assessed under Group 3 with specific consideration of flood mitigation, levels and access.

Path up to Salesians – This is the treatment proposed in place of the semi-detached houses. The proposals are described in the Landscape Design Booklet. It is described as “*a significant approach to the entire Cleeves Riverside Quarter [site], and leads to the ‘look-out’ promontory across the site before descending into the quarry either by the steps or the sloped pathway.*” The proposed public route that rises in a series of sloped paths and resting points culminates in a promontory with a viewing point looking across the reservoir and Flaxmill and the River Shannon towards the city centre. This pathway



ascends through proposed trees, amongst banks of woodland flora – including ferns. It accommodates key references to the Salesian Sisters and their presence at Fernbank in the design through inlaid and carved interpretation signage. The Fernbank gateway is reintegrated as a marker of public access the site, and it enables wider community access to one of the best locations within the Cleaves Riverside Quarter.

**Former Cold Store** – The fabric includes a combination of two phases of construction. The single storey of historic fabric erected around 1855 and the 1940s two storey rear extension.

The 1855 element may not have been completed and brought into use with the Flaxmill. Photos from the 1940s suggest this wall was once part of a flat roof structure built around 1927. Much of this fabric has been lost including the gable addressing the quarry. This means that the majority of the building both of 1855 and 1927 is no longer present. The 1855s walls were adapted in the past and new openings formed for access when it was in use. The inner face has also been cement rendered. With the upper floor and roof removed and elements of the wall also removed, the walls are now like a ruin. The rear 1940s elements housed plant and piped services. It is concrete built with a dual pitched roof. It is currently unsafe to enter due to asbestos in poor condition. Survey work undertaken in 2019 prior to restriction to access afforded understanding of the buildings form and construction. Within the Statement of Significance, this element of the structure is identified as of negative significance.

The proposals are for the demolition of the C20th concrete lean-to structures to the rear of the cold store / weaving mill. Changes to the west extent of the unused, roofless weaving mill is identified for some moderate adaption to allow for access to be formed to the quarry. This is a key node and transition between the adjacent spaces of the Flaxmill plaza, quarry / reservoir and Stonetown Terrace above. In keeping with the landscape philosophy for the site, the route here will allow the various character areas of the site to be interconnected.

In addition, the proposals are seeking to partial removal of three bays of the south ruined wall and adaptation of one opening to form a pedestrian route. Refer to 3.4 of the ADR that describes the proposed changes to the upstanding ruined walls. These changes will allow for people and vehicles to navigate to the rear of the new buildings within the quarry site. This is essential to allow for the operation and use of the site to be possible. The placement of the access route through a new opening in the wall will allow the roadway to be placed behind the buildings creating a margin between the buildings and quarry. This will allow the buildings to directly address the reservoir affording improved setting and connection for users to the landscape. The proposals also detail the retention of the end bay with minor adaption to serve as a gateway through which people can walk.

#### Design Mitigation

Flood risk mitigation is a significant factor in maintaining the function and use of the site. The design approach ensures that the development contributes positively to the urban environment while addressing flood risk in a manner that is both functional and aesthetically integrated with the site's landscape and public spaces.

Impact mitigation is also achieved through focusing change in areas of greatest tolerance for change and with greatest potential for benefits from change. The extent of demolition proposed to the cold store / weaving mill walls has been minimised to suit the access essential to permit the reuse and

development of the quarry. The retention of the surviving end bay will preserve evidence of the buildings intended length. This will bring people close to and in contact with the fabric. Where historic fabric is subject to works, the proposals describing a conservation approach seeking to minimise the loss of historic fabric. Where works are undertaken, historic fabric is to be consolidated, stabilised and repaired. Mitigation for the removal of the semi-detached houses and Office and Laboratory buildings will need to consider the salvage of fabric where of special interest.

#### Assessment of Effects

**Demolition Strategy** – The removal of later phase elements should not be interpreted as an approach that seeks to remove evidence of later phases in preference to an earlier phase. The Statement of Significance sets out that the Flaxmill Complex interest and significance is substantially based in a period of development and use spanning approx. 74 years describing this as an ‘early industrial building complex’ as stated in the description within the NIAH. The observation of the assessment is that most changes since 1927 entailed the demolition of the earlier phase structures (that held special interest), and / or the addition of new buildings and extensions (that do not hold special interest) obscuring the legibility of the site in its earlier form. As such the selective removal of later phase structures will serve to reveal the earlier buildings as part of a process to enable sustainable reuse, first of the site, and in a future development phase, of the mill buildings themselves.

**Demolition of Negative Structures** – The scope of demolition has been carefully resolved to reflect the minimum needed to permit redevelopment of the site. Retention of these structures will both limit and prevent the successful redevelopment of the site and diminish the potential benefits of returning the mill complex and millyard to use. The heritage strategy has sought to focus change in areas of greatest tolerance and potential. In the case of these buildings their current condition has informed designs for redevelopment. Within this group are buildings known to contain hazards such as asbestos. Where asbestos is present its removal will allow for safe reuse of the site. In some of the buildings this will result in the stripping of linings and / or services. None of the asbestos removal has been noted to result in the loss of historically significant fabric however its retention is inhibiting safe reuse.

**Office and Lab** - The removal of the Office and Lab building is necessary to permit the redevelopment of the mill yard to serve as a new public realm and to allow for the adaption of landscape levels to address flood risk and permit the implementation of flood risk mitigation. The removal of this building will also allow for a key view into the complex to be realised providing a high value vista to be established and enhancing appreciation of the original mill phase structures.

The demolition of the Office and Lab will result in the loss of historic fabric. Exceptional circumstances would arise where the significance of the protected structures is significantly impacted. The Statement of Significance and Building Recording offer detail and analysis that informs an assessment of the value of these structures relative to the Flaxmill complex as a whole and with regard to their status as curtilage structures. While holding some special interest, it is evident that this structure is not of such value that its loss will result in significant effects.

**Semi-Detached Houses** – Demolition is proposed to permit the formation of amenable access from the North Circular into the site. Exceptional circumstances would arise where the significance of the protected structures is significantly impacted. The Statement of Significance and Building Recording offer detail and analysis that informs an assessment of the value of these structures relative to the

Flaxmill complex as a whole and with regard to their status as curtilage structures. It is evident that the semi-detached houses are of importance to the story of the complex.

In consideration of a do-nothing approach, the houses are presently vacant and unliveable. There are hurdles to their sustainable reuse which include:

- extensive renovation to make liveable
- adaption to meet modern living standards
- presence on a shelf above the road makes accessing them difficult
- changes to enable them to meet carbon and energy consumption targets

Their relevance as structures integral to the operation of the site has been lost due to the end of operation on the site and preceding this a break in the link between the occupants and industrial activity on the site. The condition of the properties is poor, and while condition is no measure of interest or significance, the scale of development required to return them to habitable use is likely a challenge to the broader focus of the successful and vibrant reuse of the complex as a whole. It is likely that the works required to modernise the building and ensure they can operate in adherence to modern standard would require substantial changes to be made.

Quarry Access – Provision of access into the deepest areas of the site is a principle embedded in Limerick's Development Plan 2022-2028:

*d) 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.*

*e) Enhance the legibility of the natural and built environment and landscape and connections between place and spaces.*

Creation of new points of access enables positive reuse of the site. Bringing people into the site is a principle for improving heritage engagement. The proposed access route will exploit the existing terracing of the former quarry wall over which the houses are built. This will allow ramped walkways to stretch into the site and create a pedestrian link to the upper site and down to the reservoir and student residential blocks.

Whilst the demolition of the houses will result in loss of some special interest the preservation by record in the form of Building Recording will offer mitigation. The removal of the houses will benefit the scheme through much-improved access deep into the site and reservoir. In keeping with the Development Plan objectives and design principles, opening-up the site is essential to improve connectivity and quality of spaces.

Cold Store / Weaving Mill Lean to – The fabric here is a combination of C20th, noted to be of negative significance, in poor repair and complicated by the presence of asbestos also in poor condition. Its removal will not give rise to negative impact.



Proposed alterations to the upstanding walls which are effectively ruins, will result in permanent changes. These walls appear to have been extensively adapted and consolidated. They are not unique but do tell an interesting story of early ambition.

**The demolition of the lean-to structures that holds negative heritage significance will constitute a likelihood of direct, positive, slight to moderate, local and permanent effects on the special interest of the Flaxmill Complex.** These will be mitigated through the positive reuse of the flaxmill complex and provision of the mill yard as a public space.

The demolition of the Office and Lab building has potential to constitute negative effects. **The demolition of the Office and Lab building will constitute direct, negative, moderate, local and permanent effects.** These will be mitigated through the positive reuse of the flaxmill complex and provision of the mill yard as a public space.

The demolition of the semi-detached Victorian houses, original phase structures, will constitute the most impactful loss generated by the Phase II proposals. **The demolition of the semi-detached houses building will constitute direct, negative, significant, local and permanent effect.** While these will be mitigated through the positive reuse of the Flaxmill Complex and the reuse of the more significant structures it will be necessary to identify further mitigation to offset the negative effects.

In summary, the assessment must balance the broad and extensive benefits that will be achieved as a result of the scheme across the Flaxmill complex. It is evident that scheme cannot retain all of the buildings on the site and that some must be removed to improve access and enhance use. While the objective has been to first 'avoid' the loss of buildings of positive significance it is apparent that an approach to 'minimise' loss has become necessary. In accordance with section 57(10) of the P&D Act 2000, consideration of exceptional circumstances has informed the detailed investigation of the buildings within the curtilage of protected structures that are negatively affected by the proposals. In turn this has informed appraisal and development of designs seeking to minimise impact of historic fabric while also enhancing the positive reuse of the Flaxmill complex. The Conservation and Reuse Strategy set out in section 2.5 of the ADR provides clarity on the current and future intent for repair and reuse. It highlights the prioritisation for the retention and reuse of most of the structures embodying special interest. This is an important factor in the assessment of balance. Section 3 of the ADR includes an appraisal of options and consequence should the houses be retained and access into and across the site not be achieved. With the support of visualisations, the design analysis forwards the position that the absence of access in this location will be to the detriment of the character, feel and to overall access, diminishing the quality of the public realm and greatly reducing the benefit that can be generated by creating a landscape scheme of well connected public spaces.

The proposals offer clarity on the benefits that arise from the sum of the project's parts, largely through the creative reuse of the millscape to form a series of people focused spaces, each with unique qualities. **The proposals for demolition of the selected structures, necessitated by the broader need and benefits, will give rise to direct, negative, moderate, local and permanent effects on the special interest of the Flaxmill Complex. This will require further mitigation.**

#### 9.5.2.2.6 Group 7 – Upper Reservoir and Stonetown Terrace

##### Summary Description

The upper area of the site is largely empty and has not been a location of development in the past. The Upper Reservoir was built in 1947. Concrete water tanks and structures were added to support the operation of the works on the main site. See section 15 of the Statement of Significance. The site is now disused with the buildings in a poor state of repair.

##### Summary of Proposals

**Demolition and Site Preparation** – The demolition of the upper reservoir on Stonetown Terrace, which includes two concrete water tanks, a pump house, and a liquid storage tank. Partial removal of stone boundary walls. Refer to 3.7 of the ADR. These structures are defined as holding negative significance, section 15 of the SoS. Their removal will not give rise to exceptional circumstances.

**New Buildings - Stonetown Terrace** is proposed to accommodate two building blocks. A single apartment building extending up to 5 storeys and a terrace of three-storey town houses. The taller block is located on the lower side of the site set further away from the residential properties on Clanmaurice Avenue. The three-storey terrace is cut into the hill at the upper end ensuring the building heights of the terrace reflect the trend of the adjacent sites. Plant located at roof level of the apartment block is screened.

**Apartment Block Materials and Architecture** – Two main blends of brick are proposed. For the main façade a light-coloured brick reflecting Lansdowne Hall, and to contrast, a darker brick used at plant/service areas. Vertically Ribbed Fibre Cement Panelling is intended to add texture and vertical emphasis. At roof level corrugated metal acoustic screens are to be used for roof plant screening. The façades are of brick with metal balconies. Each is stacked up with soldier courses of brick at floor plate level.

**Town Houses Materials and Architecture** – Each with two bays set out in a terrace of gabled fronts creating a sawtooth roof profile. The façades are treated with a blend of light and dark bricks as used for the apartment block. The windows are large and set within the façade with minimal articulation to the openings. The ground storey is in the darker brick with the first and second in the lighter brick. A rainwater pipe descent from each valley down the front and rear of each property serves to create a distinction between each house. The roofs are to be lined in slate.

**Landscape** - The landscape is described as a communal central courtyard and a perimeter of garden spaces and buffer planting. Front doors for the townhouses, and the entrance lobby of the apartments open onto the communal garden. Landscape includes a playground of approx. 90sqm for young children and play space for older children, which is located next to the Reservoir Park accessed by a sloping route connecting Stonetown Terrace to the Reservoir.

**Design Mitigation** – The new buildings have been located on an area of the Complex that has been little developed in the past. The proposals describe buildings that retain a form and scale responding to the context of the houses along Clanmaurice Avenue and the much more substantial apartment building called Lansdowne Hall. The buildings are to be set into the slope to mitigate their height relative to the adjacent properties.

Assessment of Effects - The positive reuse of this largely empty part of the site offers opportunity to improve utilisation. Matters relating to the visual impact on adjacent Mill structures are considered later in this assessment.

The demolition of the 1947 -1970s reservoir infrastructure will remove features of negative significance.

**The redevelopment of the Stonetown Terrace plot, with integrated landscape will give rise to Indirect, positive, moderate, local and permanent effects on the special interest of the Flaxmill Complex.**

#### 9.5.2.3 Group 8 and 9 – Informal Heritage, Adjacent Sites

Analysis of the new buildings in the setting is contained within section 9.5.2.5.

##### 9.5.2.3.1 Group 8 – Former Salesians Secondary School

Summary Description – The school has no national or regional heritage designation and is beyond the curtilage of the protected structures / the early industrial mill complex.

Fernbank House was built c.1880. It was purchased by the Salesian Sisters in 1924. The initial adaption of the 1880s Victorian Villa was presumably limited to subtle measures to enable it to operate as a school. By the mid-1950s development had substantially increased the building footprints. A primary and secondary school transformed the setting of Fernbank House, sandwiching it between new development. In the 1970s, the addition of a storey fundamentally altered the appearance of Fernbank House and unified the primary elevation of the school creating a monolithic presence. These changes were echoed internally resulting in the loss of original fabric save for selected rooms that possessed components of artistic interest.

Summary of Proposals - Demolition of the existing structures.

Redevelopment will include apartments, townhouses, a crèche, extensive communal open space and car parking. The site will be integrated with the surrounding terrain, forming connections to the Quarry site and North Circular Road. Pedestrian routes and landscaped areas will enhance connectivity and permeability within the development and to adjacent sites.

Form - The proposed Salesian site buildings feature a mix of terrace house-inspired apartments along the North Circular Road, characterised by steeply pitched roofs that address the level change and establish a visual connection to the homes opposite. Within the site, taller apartment buildings adopt a mill-like typology, referencing the legacy of the Cleaves Mill.

Scale - The development transitions in height from the street frontage to the interior:

- Street edge: 3 to 4 storeys, forming a terrace-like boundary, ensuring a gradual transition to the existing context and streetscape
- Interior: Taller buildings set back from the street, with heights of 6 and 7 storeys.
- Corners and edges: Lower buildings of 1 and 2 storeys, ensuring a gradual transition to the surrounding houses and school.

Massing - The massing strategy integrates the transition in scale by placing lower buildings at the site's edges and taller buildings towards the centre, away from the street, to mitigate the visual impact of height.



The orientation of the taller buildings is north-south, presenting only the thinner gable ends to the street and preventing the creation of an impenetrable wall of housing.

The ground level changes across the site, allowing taller buildings to appear smaller at the rear (6 storeys instead of 7).

The design ensures contextual integration with the existing urban fabric, balancing development opportunity with sensitivity to the surrounding environment and heritage context.

**Materials and Architecture** - The design for the apartment blocks and town house are shaped by its steeply sloping terrain, which rises from the street to overlook the historic Mill, the River, and the City Centre. The architectural language and materials establish a strong connection to the industrial character of the original Mill site, while maintaining a distinct identity and ensuring visibility within the city.

**Brick** – This is the dominant material across the residential buildings, providing visual coherence with adjacent plots and neighbouring structures. Red brick is used prominently outside the original Mill curtilage, helping to define the new buildings. This also references the historic use of red brick throughout Limerick and the Cleevess site. The base of apartment buildings is described in a darker brick tone to distinguish the lower levels.

**Stone** - Existing and reused stone will be incorporated into the landscape, reinforcing the connection to the site's industrial heritage.

**Metal Cladding** - Light green, ribbed metal cladding is proposed to add variety to the longer buildings and to continue the tradition of lighter industrial sheds historically present on the Mill site and synonymous with use on larger structures. All metal window frames and railings are described as to be finished in the same green tone, visually tying together the elements of the façades.

The overall approach ensures the new development is both contextually sensitive and visually distinctive, with a clear link to the site's industrial past and the broader architectural character of Limerick.

**Design Mitigation** – The proposed buildings respond to the form, scale, massing and materials of the buildings near the site. The landscape proposals will reuse salvaged stone and other durable materials suitable for external reuse.

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

*“Restoration is appropriate only if there is sufficient evidence of an earlier state of the fabric, and only if returning the fabric to that state reveals culturally significant aspects of the place. Restoration is based on respect for all aspects of cultural significance of the place, including later accretions. It should stop at the point where conjecture begins, and must not confuse the understanding of the place.”*

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

The School buildings are vacant, reducing the potential for negative impact, and has not been used as a place for communal gathering and learning in recent years.

The demolition of the non-designated structures holds some potential to give rise to negative effects where it will entail the loss of fabric of interest. The salvage schedule affords the basis upon which fabric of interest that has not already been lost through past changes may be preserved for future reuse. Refer to appendix 9.3.8, and the table contained under section 7. Also section 5.5 of the ADR. Where this is possible it would afford this fabric a future it doesn’t have in its current situation as part of a disused and vacant building.

**The re-development of the Former Salesians Secondary School site, with integrated landscape will give rise to indirect, positive, moderate, local and permanent effects.**

#### 9.5.2.3.2 Group 9 – Shipyard Site - also refer to section 13 of the SoS

##### Summary Description

The existing site is a carpark with warehouse contained behind an existing wall. The site is beyond the curtilage of the Flaxmill complex. The enclosing wall is a mixture of fabric dating to various periods. The warehouse dates to the 1990s and was built following the clearance of the site around the same time. The introduction of the warehouse entailed the removal of a section of the pre-1850s boundary wall. The walls of the former shipyard site are a combination of the residual façades of former buildings that occupied the site from the 1800s up until the 1990s and contemporary masonry walls. They tell the story of occupation and evolution of the site. Where they survive, most retain scars of former openings some of which were later insertions to the original wall. The arrival of the Shannon Bridge transformed the setting of the site. By the early 1990s the historic buildings had been demolished and the site cleared. The boundary wall and boundary façades were retained to maintain a secure enclosure to the site. This permitted its use for storage and more recently a carpark.

##### Summary of Proposals

Demolition Works - Demolition of a warehouse located on the Shipyard site to facilitate new development. Refer to 3.5 of the ADR. Localised adaption and partial removal of stone boundary walls to allow for access and permeability of the site. Refer to 3.6 of the ADR.

Construction and Temporary Uses – A new dedicated mobility hub with a canopy, double stacker bicycle parking, and EV charging spaces within the Shipyard Zone. This will include a dedicated pedestrian/cycle link connecting North Circular Road with Condell Road, passing through the Shipyard Zone. The remaining area of the Shipyard Zone will be used for temporary car parking and a temporary external event space, to be used periodically as needed, pending future redevelopment proposals detailed in the Masterplan (to be addressed in Stage IV).

The historic walls will be the subject of localised consolidation and repair. This will ensure they are stable, in good repair and suitable as part of the public realm.

The wall along the North Circular Road will be protected from the raising of the road through the placement of a parallel foundation. This has been designed to avoid change / loss of fabric of the wall. The raising of the road is essential to address flood risk and provide mitigation.

Public Realm and Ancillary Works - Extensive public realm improvements, including landscaping, public lighting, and provision for refuse collection and bicycle parking. All ancillary site development works, such as water services, foul and surface water drainage, attenuation proposals, and landscaping, are included as part of the overall Phase II works and will serve each development zone, including the Shipyard.

#### Design Mitigation

Openings are to be located relative to pre-existing construction boundaries i.e. where walls and windows once occurred. Openings will be formed in matching materials or materials that reflect the tone and colour of the limestone with detailing executed to a high standard.

Methods of consolidation and repair of the historic boundary walls will adopt conservation principles outlined in the ADR.

The engineering design for changes to allow the road to be raised have adopted a conservation lead approach where the primary objective is to avoid negative impacts. A parallel foundation will allow the wall to be retained largely unchanged.

#### Assessment or Effects

Warehouse - The demolition of the 1990s structure will not result in the loss of historic fabric. The effect of its removal will be direct, positive, moderate, local and permanent relative to the appreciation of the setting and in relation to the wider Flaxmill Complex.

Shipyard Boundary Wall Proposal - Localised opening-up and the removal of sections of wall to create openings into new public realm have potential for negative impact. In addition, the implementation of climate change resilience measures, in the form of a raised ground level to provide for flood risk mitigation also have potential to result in negative impacts. However, the designs for these changes have adopted a conservation-led approach where avoidance and minimisation are the first steps.



Further to this, the consolidation and repair of the historic fabric through the care of the historic boundary wall will be beneficial.

**As a consequence, the proposed changes to and reuse of the former shipyard site will give rise to effects which will likely be direct, positive, moderate, local and permanent relative to the appreciation of the setting and in relation to the wider Flaxmill Complex and the cultural heritage of the shipyard site.**

#### 9.5.2.4 Group 10 to 12 - Heritage near the site (NIAH)

Each of the following groups collects heritage assets relative to the development site. Group 10 is broadly structures to the west and north; Group 11 to the northeast and Group 12 to the east.

##### 9.5.2.4.1 Group 10 – Houses located to the west and north of the development site

###### Summary Description

This asset group is principally two and three storey dwellings. Except for Shelbourne House (1837) all were built between 1890 and 1930, aligning with the condensed milk phase at Cleeves. Their interest is substantially based in architectural interest with aspects of social interest arising from the advent of the housing type to meet the needs of the expanding middle classes. There is also potential for historical interest most notable with Shelbourne House. In addition the post box holds technical interest.

The closest, Marylawn House is located on Clanmaurice Avenue and backs onto the Salesians Primary School which is adjacent to the development site. The next closest are the houses along Shelbourne Road Lower where there is no visual connection. In addition to the houses, a 1930s cast iron post box occupies the corner of O'Callaghan Strand and Ennis Road opposite the Sarsfield Bridge. There is no visual connection between this post box and the site although both can be seen when viewed from the opposite side of the Shannon.

Assessment or Effects - The house on Claumaurice Avenue and those along Shelbourne Road Lower will have views that extend toward the development site. In addition, when viewed from the street, the backdrop of approximately three of these properties will be augmented by the proposed buildings on the Salesians Site.

The houses along Ennis Road and Shelbourne House are at a greater distance. The proposed development is not visible in their setting.

The redevelopment of the Cleeves site will not diminish the appreciation or interest of the structures listed within this asset group. **The likely effects will be indirect, neutral, not significant, local and permanent.**

##### 9.5.2.4.2 Group 11 – Structures and Monuments to the North and West

###### Summary Description

This asset group collects a mixture of assets including the Sarsfield Bridge (1824-35), 1916 Memorial, historic pier (1820) and the Boat Club clubhouse. They are closely grouped with the site visible in their setting when viewed from the northeast. As a group they embody a broad range of interest including

architectural, historical, artistic, cultural, technical and social. They represent the expansion of the city across the river and people's close relationship to the river. The monument is a powerful daily reminder of the city history and action of its people.

Assessment or Effects - These assets are key features of a thriving city. All will be seen within the context of the development although at some distance. In this case of the Cleeves development, **the likely effects will be indirect, neutral, imperceptible, local and permanent.**

#### 9.5.2.4.3 Group 12 – Structures to the East, across the Shannon

##### Summary Description

To the east and across the Shannon there are two structures holding heritage interest within 300m of the site. The Bishop's Palace and Hibernian House are set back from the river addressing Henry Street. Each faces away from the site with the building backs rising over lower development at the river's edge. The backs of these buildings look directly over the River Shannon toward the development site. The two buildings hold architectural and historical interest.

Assessment or Effects - The buildings are primarily appreciated from Henry Street from where it is not possible to see both these buildings and the development site. To their rear, along The Bishops Quay, (a main road skirting the river's edge), the rear of these buildings can be seen in the setting of various periods of development. Most notable is the 'Limerick City Hotel'. At approx. 12 storeys this building dominates the junction of the road and the Shannon Bridge creating an imposing presence on this asset group. By contrast the Cleeves site is some distance and not perceived in direct relation to these assets. In this case of the Cleeves development, **the likely effects will be indirect, neutral, imperceptible, local and permanent.**

#### 9.5.2.5 Likelihood of Visual Impact

##### Summary Description

The Phase II project will entail the construction of a series of new predominantly residential buildings. These are located across the development site with each grouping of building responding to its setting. The rooftop of Block 2a of the PBSA includes the micro-siting of telecommunication antenna. The placement does not significantly alter the visual profile of the rooftop and does not introduce new visual obstructions or skyline disruptions. The general form and massing of the buildings borrow from that of the Main Mill with clear parallels in the rhythm of the façade of the historic and new buildings. The development is of sufficient scale that it will be visible from afar with greatest potential for it to be seen from across the River Shannon and from the south where it will define the development edge for the west bank of the river next to the Shannon Bridge. Here the Main Mill and Chimney can be seen with the Chimney projecting above the building line and remaining a key feature. To each side the new buildings are of greater scale and mass than currently exists. They redefine the built context although do not appear to dominate it.



**Figure 54** – Phase II outcome (View 01).



**Figure 55** – Phase II outcome (View 03).

From the east, north and west, when the proposed buildings are visible. They blend in with the wider development setting (Views 08 and 10). The Main Mill and Chimney retain clear presence with the Chimney projecting above the building line.





**Figure 56** – Phase II outcome (View 08).



**Figure 57** – Phase II outcome (View 10).

From the north and west when approaching the site it is possible to see the buildings from the surrounding streets. From Clanmaurice Avenue, the apartment block on Stonetown Terrace appears as a block beyond the end of the houses (View 13). The Chimney is visible in the space between the proposed apartment block and town house. Oddly, the existing power pole has a dominating presence.



**Figure 58** – Phase II outcome (View 13).

From Shelbourne Road Lower and Clanmaurice Avenue, it is possible to see the block on Salesians rising up behind, but not exceeding the level of the roofs of the houses. It is not possible to see the Flaxmill Complex (View 14).



**Figure 59** – Phase II outcome (View 14).

From the roundabout at the junction of Shelbourne Road Lower and the North Circular, the town houses redefine the development edge near the road. The domestic aesthetic of these buildings responds to the steep roof houses of Fernhill. Behind the proposed townhouses, the new apartment blocks of Salesians rise up (View 17). The Chimney and Main Mill remain visible in the distance.





**Figure 60** – Phase II outcome (View 17).

Moving away from the site along the Condell Road, the larger scale building of Salesians and Stonetown Terrace become more visible. Fernhill establishes a lower scale at the road edge, set slightly below the road. The roofs of the proposed townhouses can be seen just beyond. The proposed buildings are visible within the context of the Mill Chimney (View 19).



**Figure 61** – Phase II outcome (View 19).

#### Design Mitigation

The design methodology, architecture and aesthetic of the proposals are well described in the ADR and proposal drawings. The proposed building heights and massing have sought to respond to the setting. The materials have sought to make the building appear contextual.



Assessment or Effects - The proposed buildings are predominantly viewed within the existing built context. From the south, they are seen within the context of the Flaxmill Complex and redefine the built setting. They are largely unseen from the north and west. In closer proximity, when they do become visible, they are largely contextual. In consideration of the views of the site and its setting, the likely **effect will be direct, positive, slight, local and permanent relative to the appreciation of the setting and in relation to the wider Flaxmill Complex and wider cultural heritage.**

### 9.5.3 Construction Effects

Construction of the proposed development will give rise to the extent of effects on the setting of architectural heritage that might be expected from any large construction project, including the normal effects on setting associated with hoarding, tower cranes, construction traffic, noise, dust and emerging and unfinished structures. **Construction effects will be indirect, negative, slight, local and temporary.** Construction phase measures will be necessary to mitigate impact and protect historic structures from the enhanced risks that are known to be present during phases of construction. Measures will include:

- Interpretation on hoarding and scaffold wrap to mitigate loss of sight of protected structures
- Dust suppression and management
- Traffic management to mimes and prevent harm to the protected structures
- Site monitoring by contractor and specialist to allow for maintenance of protection and corrective action when necessary

Having regard to the general nature of the construction works as described within the proposals, it is considered that the potential effects on the setting of surrounding architectural heritage arising from the proposed development during the construction phase will be 'slight' to 'moderate' in extent under a worst-case scenario. The character of effects on setting during the construction phase is likely to be wholly negative at first, becoming neutral to positive as work proceeds and the new structure becomes apparent. There will be no direct physical effects on surrounding architectural heritage.

The scaffold required for the construction of the building addressing O'Callaghan Strand will obscure views into the complex. As there is currently no public access into the site and uses are largely storage and meanwhile, construction activity will not generate the potential for interruption in operation until after Phase II. As with Phase I the construction phase impacts effects will be slight and temporary.

Construction traffic and re-organisation of traffic between phases has the potential to impact the architectural heritage through vibration. Chapter 13 offers analysis of vibration. Table 13.4 indicated vibration limits. Where vibration occurs, it may exacerbate the vulnerability of structures where the condition is already poor. Likewise, demolition of existing structures on the site, or elements of buildings attached to historic buildings to be retained, may cause physical impacts on the historic buildings to be retained. The likely phased construction effects will be slight and short-term.

### 9.5.4 Operational Effects

#### 9.5.4.1 Application Site

The reactivation of the site and change of use will result in positive outcomes. Using the millscape setting as the basis for new use will have a positive effect.

Occupational traffic serving the new buildings is unlikely to be any more impactful than current or historic traffic activity on the site. The likely effects are indirect, imperceptible, long term and neutral.

The presence of new residence and some commercial activity set around a shared landscape that is defined by the language of the millscape will likely afford positive, permanent, moderate effects.

#### 9.5.4.2 Masterplan Site

A true understanding of the effects of development must also be considered in the context of the overall masterplan site. The completion of development on the site as described in the Illustrative Masterplan Vision Document would substantially enhance access to and use of built heritage. The vision for the transformation of a disused and derelict early industrial site into a vibrant, multi-use, multi-occupation site is positive. Shared and publicly accessible spaces defined by the millscape and placing heritage at the centre of the development will provide significant, positive effects.

**Phase I – Heritage Works.** The works are concerned with securing the building for future reuse. The building will not be operational at the conclusion of this phase.

**Phase II – Residential & Public Realm.** The use of the mill yard and wider site will provide a moderate, short-term and positive effect serving as a moment in time prior to the progression and completion of later phases.

**Phase III – TUS Campus.** The adaptive reuse of the mill structures will offer a very significant, positive and permanent effect. This can be achieved without the need to deliver Phase IV.

**Phase IV – Shipyard Site.** The development of a tower in the setting of the main mill and chimney will result in significant, negative, permanent effects upon the architectural heritage. However, the enhanced occupation and use of the site should be interpreted as the natural next step in the story of the site's development. New users will be brought into contact with built heritage enhancing its significance. This will improve the sustainable, long-term future of the mill complex and for this reason it will afford significant, positive and permanent effects.

### 9.5.5 Do Nothing Scenario

The implications arising from a 'do-nothing scenario' are relevant to both the wider masterplan site and the application site.

There has been no new development within the site since its closure in 2011 and many of the structures are now unsafe and in decay. Phase I consolidation and repair works are underway to stabilise the main mill and bring it to a condition that will support its sympathetic reuse. The complexities of the site call for a joined-up approach of sufficient scale to enable positive reuse. This is central to the Cleaves Riverside Quarter Masterplan. Temporary uses have introduced opportunity for new ways to utilise and access the site's special character. This has shown the potential for heritage interpretation and improved awareness of the site and its history.

A 'do nothing' scenario would result in the progressive decline of the Flaxmill Complex. This would result in a permanent loss of significance as building fabric continued to decay, and more structures failed.

The following is drafted on the basis that the phases are sequential.

**Phase I – Heritage Works**. The progression of the stabilisation and repair works will prevent permanent loss and mean that the baseline at commencement of Phase II will have adjusted. These works are essential to preserve the structure and make the site and buildings safe to access. In their current state, an assessment of no nothing reflects the broader trend of decline and loss across the complex.

**Phase II – Residential & Public Realm**. The buildings on the site are largely out of use or have basic meanwhile uses as storage facilities.

Flaxmill Complex - The existing site and buildings are in a state of decay. The Phase I works have been accelerated due to the advanced deterioration of the Main Mill fabric. Several of the buildings on the site are no longer safe to access. The protected structures will further deteriorate in a 'do nothing' scenario.

Shipyards Site – The warehouse and carpark have ongoing use. This would continue. Some parts of the historic boundary wall are in poor condition. Their instability would likely progress gradually.

Salesians School – The School has been vacated. Temporary accommodation has been created through the adaption to classrooms within the 1950s element. The buildings are in a failing state of repair. Some parts are not fit for habitation. Without intervention the building will continue to deteriorate.

Summary - If development of the plots within the mill complex are not advanced there will be some short-term preservation of minor historic structures within the curtilage of the Main Mill. Looking further ahead it is likely that the structures will deteriorate making them vulnerable to permanent loss.

**Phase III – TUS Campus**. The reuse of the mill buildings is central to realising positive effects. If the adaptive reuse and redevelopment of the historic structures does not proceed it is likely that they will continue to deteriorate. The proposed Phase I repairs to the main mill will stabilise the fabric. The Phase II works will improve the setting and result in improvements to the boundary wall and other minor retained structures in the context of redevelopment on the wider site. The adjusted baseline to recognise works progressed as part of Phase I and II will have provided important safeguarding against loss of the larger structures. It will not have addressed the long-term needs of the protected structures that are identified as within the scope of Phase III and listed in the summary under 9.4.1.1.

**Phase IV – Shipyards Site**. The retention of the shipyard site as it currently exists will result in neutral effects. Should Phases I and II progress the shipyard site will be brought into public use. The designs for the adaption of the boundary wall are broadly sympathetic and minimal in terms of intervention. The baseline will develop as Phases I, II and III are advanced. The 'do nothing' outcome for each phase is broadly similar save for improvements to the boundary wall of the shipyard site that would arise once Phase II has progressed. The Shipyard site is not within the curtilage of the Flaxmill complex so changes to it will have no direct impact.



## 9.6 CUMULATIVE DEVELOPMENT & IMPACTS

### 9.6.1 The Flaxmill Complex

Assessment of impacts must consider the basis of heritage significance. The Flaxmill site has been subject to development throughout its use. Not all development has positively informed the special interest of the complex. The phases of development are set out in detail in the Statement of Significance and each structure and feature is described relative to the phase. The site ceased operation in 2011 although there was a period of reduced activity extending over many decades leading up to this. In the latter part of the C20th many buildings were underutilised and several gradually dismantled or reduced to minimise risk of collapse. New additions that emerged from the 1940s up until the 1990s lack the vision and architectural sensitivities of earlier enterprise. In the mid and latter C20th, changes typically resulted in negative outcomes for the integrity and legibility of the earlier Flaxmill and Condensed Milk phase structures. Development of the late C20th and changes of the early C21st have been resulted in permanent, moderate and significant, negative effects.

### 9.6.2 Contextual Proposed and Permitted Development

In addition to the proposed Cleaves Riverside Masterplan, there are a number of proposed schemes in the surrounding area (up to approx. 1km from the site see 1.9.5 of Chapter 1) which may have a cumulative effect on the built and cultural heritage, these are listed within Appendix 1.1 of this EIAR. None are within or bordering the curtilage of the Protected Structures identified as the Flaxmill Complex; none are on the Shipyard Site or the Salesians Site. Almost all will not be visible from the site or within its context. The majority are minor in nature and hold no potential to affect the built and cultural heritage of the site. Some of the developments are of moderate scale however these are hundreds of meters from the site and will remain unseen (e.g. residential development of 285 units on O'Curry Street, 490m from the development site). These will not give rise to effects on the development site.

Of the development within 1km of the site - Development seeking the positive reuse and retention of historic fabric will support the conservation of built and cultural heritage. Relevant projects include no.2 and no.3 Mallow Street; redevelopment of the existing school at Sexton Street; change of use and remodelling of the former city library at 58 O'Connell Street; Repair and redevelopment of Shelbourne House. In addition, and subject to future activities, the proposed creation of a 'cultural centre' at no's 20 – 24 Wickham Street holds potential for positive, cultural heritage.

Other recent developments which have resulted in positive cumulative impacts on the preservation of historic building stock in Limerick include Hanging Gardens (between O'Connell St. and Henry St.) the Bishop's Palace (Henry St.) and the Opera site, where Phase I is due for completion in December 2025. These schemes have reused existing buildings of historic and architectural significance to embed heritage and culture in new development. The schemes have sought to repair, reuse, conserve and integrate historic structures into larger schemes.

Negative effects will arise where demolition is proposed without mitigation. Review of the developments indicates loss of built heritage is limited. This includes the removal of stone boundary walls and buildings such as the demolition of the derelict buildings at 48-50 Parnell Street; demolition of a single storey outbuilding at Ballineen (a protected structure).

**In summary, the cumulative effects of the contextual development are likely to be substantial, positive long-term and permanent.**

### 9.6.3 Visual Impact

The verified views have been prepared to illustrate the current proposal. The later 'masterplan' phases are yet to be designed and as such are not illustrated. This ensures the visual analysis remains aligned with the defined development baseline and avoids overstating potential effects. Illustrating future phases within the montages would misrepresent the magnitude and significance of change, as these elements are unconsented and hypothetical. They cannot form part of the receiving environment or part of the proposed development that is the subject of this application

### 9.6.4 Past Development Patterns

The built cultural heritage of the masterplan site is defined in the Statement of Significance. This provides a narrative that observes the impact of mid and late C20th development on the site while it was operational. The document also identifies phases of previous demolition including the destruction of the former shipyard site in 1986 for the Shannon Bridge and clearance of the adjacent site in the 1990s. This pattern of development has resulted in substantial, long-term and permanent, negative effects.

### 9.6.5 Phased Development on the Site

The development of the new buildings on the site in combination with development in the wider context will have a cumulative impact arising from development in the setting of protected structures. The combination of contextual development will not add to the effects assessed as arising from the Phase II development on the site.

Development on the site will have visual impact on the historic character of the site where new structures replace existing. These will redefine the backdrop of the mill complex and its appearance from across the Shannon.

O'Callaghan Strand – The new building within the curtilage of the complex will redefine the views of the Main Mill. Its designs, while sympathetic will result in permanent changes to the view of the mill. From the northeast aspect across the Shannon, view 05, the visual dominance of the new building is very significant. Views from the south (views 01 and 02), east (view 03) and further north (views 06 and 07) the visual impact of the new building on the Main Mill is much less. Here the impact on views of the Main Mill will be moderate, negative and permanent. The architectural treatment of the building is sensitive to the materials and architecture of the mill complex and significantly diminishes the visual impact. **The reuse of the site is, however, positive.** Consideration of the potential scale of development within Phase IV provides future context placing the Main Mill and Chimney in a broader development setting. Here the mill complex can be read as the core of a substantial development. The prominence of both of the protected structure would be impacted as they become cultural features within a redefined setting.



**Figure 62** – Phase II outcome (View 05).



**Figure 63** – Phase II outcome (View 02).

Quarry and Reservoir – The placement of three new residential buildings at the rear of the site will alter the backdrop of the historic mill complex. They replace the existing former Salesians Secondary School which currently forms the backdrop but that is proposed for demolition. The three new blocks within the quarry are taller than the former school building and emulate the massing of the Main Mill. They respect the alignment of the complex and can be read as a backdrop avoiding a sense of encroachment. ***The new buildings within the quarry will result in a neutral, moderate, permanent cumulative effect to the view.***



Stonetown Terrace – The development of the largely empty site above the Main Mill will result in the creation of two new residential buildings. These have been scaled to respond to the setting of the pre-existing development on Stonetown Terrace, Lansdowne Hall and the early C20th houses along Clanmaurice Avenue. Sight lines that capture the Main Mill and Chimney in context are limited to those from the south along Steamboat Quay and when crossing the Shannon Bridge. Views from this aspect capture the new building serving as a backdrop to the Main Mill. In its existing, undeveloped state, the site is unseen when viewed from viewpoint 01 along Steamboat Quay. The new development will rise to the west of the Main Mill being visible in the space between the Main Mill and the Chimney, above the former Weaving Mill. The Weaving Mill is noted for adaptive reuse as part of the future TUS scheme in Phase III. This will entail the recreation of a two / three storey massing (not depicted).

While the presence of a new building above and to the west of the Main Mill alters its visual prominence, the accumulation of development will enhance the solidity and massing of the buildings within the historic mill complex. ***The new structures on Stonetown Terrace set above the flaxmill will result in moderate, negative, permeant cumulative effect.***

The arrival of Phase IV will likely result in this view becoming obscured.



**Figure 64** – Right, Phase II outcome (View 01).

Salesians – The site is not within the curtilage of the protected structures of the mill complex. Redevelopment of the Salesians site has greatest potential to give rise to negative impact through changes in the setting of the mill complex. Views from the west and north are largely occupied by existing buildings with little if any visual connection to the mill structures. ***When viewed from the east and south, the replacement of the school buildings will result in an increase in the scale of building visible beyond the mill. This will alter the setting giving rise to moderate, negative, cumulative effects.***



**Figure 65** – Phase II outcome (View 03).

### 9.6.6 Summary of Cumulative Impacts of the Phased Masterplan

**9.6.6.1 Phase I** – Consolidation and repair, starting with the Main Mill places the retention of historic fabric as a core priority. Section 2.2.4 sets out the intended approach which has been informed by an assessment of significance and condition. Positive cumulative impacts will result from the repair of the historic structures. This will benefit both the immediate millscapes and views of the site from adjoining streets and across the Shannon.

Effects - Phase I will give rise to significant, positive, permanent effects.

**9.6.6.2 - Phase II** – The development of the site will result in permanent changes to the setting of the mill complex with significant, negative effects arising where the visual dominance of the Main Mill is altered. The phase will also unlock the site transforming it into a publicly accessible environment. This is a critical step in a multi-phased approach to repair, reuse and development.

Effects – Phase II will give rise to very significant, positive, permanent effects.

**9.6.6.3 - Phase III** – The adaptive reuse of the mill complex will give rise to very significant and profound, positive, permanent effects ensuring the long-term sustainable future of the complex. This phase will deliver substantial benefits that compensate for the impact of redevelopment. The addition of new building forms, often integrated with the historic fabric will offer a grounded, highly contextual scheme creating a new campus around the shared mill yard.

Effects - Overall, it is likely that Phase III will give rise to very significant, positive, permanent effects on cultural heritage.

**9.6.6.4 Phase IV** – The redevelopment of the Shipyard Site will completely alter the setting of the mill complex. The proposed new structures will likely affect views from the south and along the Condell Road. Some long-range views, particularly from across the Shannon will be redefined by the addition of a tall building acting as a gateway to the city. The visual impact is lessened when viewed from the southeast, east and around to the north. Views from the northwest and west and further afield in the context of the skyline of the city will be less altered largely due to the limited aspect of the site in its pre-existing form. The development of the Shipyard Site will not diminish the significance of the mill complex but will most probably alter the visual dominance of the Main Mill and Chimney. Historically the mill complex was set in a richer built setting of 3 – 5 storey buildings that stretched across the former Shipyard Site. The second half of the C20th has resulted in changes including the demolition of most of the early industrial structures and the arrival of the Shannon Bridge. The progression of development will result in a reinstatement of structures in the setting of the mill complex. Placing the mill, mill yard and reservoir at the heart of the scheme will both compensate for the impact of development and elevate the built and cultural heritage value. The negative effects will be predominantly linked to impact upon the visual prominence of the Main Mill and Chimney while the broader benefits will most likely be significant, positive and permanent.

Effects - Phase IV will likely result in moderate, positive, permanent effects on cultural heritage consolidating work achieved in the preceding phases.

## 9.7 REMEDIAL & MITIGATION MEASURES

### 9.7.1 Incorporated Design Mitigation

Heritage led process - The designs for the redevelopment have been informed by an understanding of heritage interest. The assessment of the site, research of the site and buildings histories have guided a sophisticated appreciation of importance. This has guided an approach to the division of the site into character areas and informed proposals for change ranging from demolition through to minor changes to existing walls, many of which are ruins. This has informed the resolution of a conservation strategy set out in an overarching site plan in drawing 'CRQMP-FCBS-ZZ-XX-DR-AA-1901' within appendix E of the ADR and a series of mitigation strategies contained within chapter 7.0 of the ADR.

#### Demolition and Removal Principles

- Selective demolition focused on buildings of little or negative significance to enable the successful reuse of the wider site.
- Demolition is described as minimised to only those buildings necessary to permit future reuse and development. Section 7.9 of the ADR includes detailed proposals for the retention of the facades of the former Linen Store.
- Removal of hazardous material from the site making access and use safer and permitting the progression of repair works.

#### Preservation by Record

Current Strategy - Where buildings of cultural significance are identified for demolition, the intention is to preserve the building by record. Building recording and the salvaging of fabric of interest is proposed. Material will be set aside and reuse in the landscape and in the repair of the retained historic structures.



Interventions:

- Designs for new interventions describe an approach that is sympathetic to the special character of the buildings and the site as a whole.
- Where elements are wholly new, they are intentionally designed to be read as such. Complimentary materials ensure no loss of quality.
- Structural interventions to consolidate the boundary walls along the North Circular Road have been designed to avoid and minimise potential impact to the historic walls.

Landscape and Boundary:

Opening-up the wall and transforming the Mill yard – This will positively transform the complex making it a public place and allowing people up to, and eventually into the historic buildings. The lowering of the boundary wall and tiering of the southeast end of the mill yard will open new views into the complex, creating new opportunities and appreciation.

- The line of the site boundary has been preserved. While the boundary wall is noted for reduction in height and partial removal, the threshold between the street and mill site will remain clearly legible.
- Salvaged materials will be a feature of the landscape. Details will be developed once the progression of demolition activity permits the preparation of a detailed schedule of material, building on the work completed by ACP and contained in appendix 9.3.

Architecture and materials – The articulation of the building facades, notably that of the proposed building to O'Callaghan Strand, respond to the mill context, see ADR 7.8. Materials have also been selected to match the colour and tone of the context, see ADR 7.7. The materials for the buildings in the Quarry are described in section 8. Stonetown Terrace is described in section 6.7. Common to these proposals is the contextual nature of the materials. Each set of buildings seeking to respond to the character of its area while also reflecting the close relationship to the Mill Complex.

Architecture - form, scale, massing – The buildings have been described in detail earlier in this assessment. Section 8.1 of the ADR offers commentary on the stepped height and massing of the buildings within the Quarry. Stonetown Terrace is described in section 6.1 through to 6.7. Common to these proposals is the reference made to massing and heights within the context. Each set of buildings is seeking to respond to the character of its area while also reflecting the close relationship to the Mill Complex.

### 9.7.2 Additional Mitigation

Technical Design Phase Mitigation – Technical designs will be resolved in sufficient detail to provide the contractor with the information needed to protect built heritage. Where existing and historic buildings are concerned designs will be resolved in detail with designs able to respond the needs of the historic fabric emerging during opening up and construction process. This will be achieved by providing sufficient time and knowledge to accommodate site phase discoveries. The conservation architect will be allowed time to make adjustments to the designs to ensure conservation principles can be applied to preserve the assets special interest.

Engagement with a Competent Authority – The conservation architect will maintain communication with the Conservation Officer including submission of reports and information required to show compliance.

Prior to demolition

A conservation surveyor / architect will be employed to offer guidance on the process for preservation of interest where the removal of structures and features from site are proposed.

A demolition methodology will be prepared by the contractor in consultation with the accredited conservation architect / surveyor. This will reflect the philosophy set out in the design documents and as described in sections 2.5 of the ADR. In brief the principles distinguish demolition from dismantling.

During demolition and during construction

Record of Architectural Heritage – Refer to the recording methodology contained in section 6 of the Building Recording Reports under Appendix 9.3. A comprehensive record of findings relative to the existing architectural heritage will be maintained. This will be through the augmentation of the record created to support the design development. This process will further the pattern of recording undertaken since 2019 and which has been periodically updated with new information obtained through survey and investigation. The record will include the following:

- Statement of Significance – *periodic updates when new information comes forward*
- Building Records – *update with enhanced record obtained via observations of dismantling / demolition.*
- Salvage and Reuse – *coupled with Building Recording, development of the salvage record with design review to allow for materials to be retained and utilised within the repair works.*
- Social History & Interpretation – *a consultant must be employed to lead on the development of the site's social history. Findings must inform site-wide interpretation.*

Stabilisation and Repair

The following describes measures that will be implemented where existing structures are removed resulting in change to retained structures.

Consolidation and repair – Works to structures within the Flaxmill Complex that possess special interest will be designed by a conservation accredited architect / surveyor. These will be executed in accordance with conservation principles by appropriately qualified, experienced and skilled crafts people. This is specifically relevant to buildings affected by the removal of abutting and unsympathetic later phase additions notably the Main Mill rear extensions, lean-to on the cold store / weaving mill and the warehouse abutting the Cheese Plant. Detailed proposals will be prepared prior to the commencement of demolition and will be updated informed by findings arising from the demolition / dismantling process.

### **9.7.3 Construction Phase Mitigation**

Current Stabilisation Strategy – Prior to demolition identified within the Phase II development proposals, work to stabilise the Main Mill shall secure vulnerable fabric. This exemplifies an approach to mitigate risk to the protected structures. Progressing the repair and stabilisation of vulnerable structures will guard against unintended loss and / or the exacerbation of instability that can arise from adjacent construction activity. Further to this, the phased approach to progress stabilisation and repairs will continue in parallel with future development. Protected structures that have yet to be stabilised prior to

the progression of new development will be assessed and secured to minimise the risk of construction phase activity giving rise to unintended loss.

**Construction Phase Plan** - Prior to commencement of demolition or construction activity, the contractor will prepare a construction phase plan with regard for current assessments of the condition of the historic buildings identified for retention and that have potential to be negatively impacted by construction activity. The plan will include measures to prevent unintended loss such as that which would arise from a vehicle colliding with a building. It will include the preparation of briefing packs for all parties involved in works on site to ensure the workforce are aware of the sites special interest. This will support efforts to make site operatives custodians in the care of the historic structures during the construction process. Measures specific to heritage will be:

- Communication of the sites heritage significance and history
- Details on the buildings condition and repair needs
- Methods of protection to be in place and maintained
- Masterplan context information to share the story of the masterplan and future intentions
- Meetings with the conservation specialists / architect / surveyor
- Periodic updates on the project story and new information abouts the buildings

**Temporary Protection** - Where historic fabric is to be addressed by the works, temporary measures shall be designed to first avoid impact and second to minimise loss and impact. A team of experienced conservation specialist shall be in place to support the contractor so that risk of adverse impacts on the heritage can be minimised.

**Appropriate Knowledge and Oversight** - The contractor shall have an appropriately qualified heritage manager to help ensure protection and care of the site's heritage is managed. Salvage of materials shall be led by a conservation specialist to ensure maximum retention for reuse and / or appropriate crating where fabric has to be stored. This approach will help minimise or eliminate adverse impacts on construction schedules and heritage.

#### **9.7.4 Operation Phase Mitigation**

The following is a summary of the operational phase mitigation measures that will be embedded in the detailed designs. Many of these will only become clear once demolition has progressed as this will afford discovery of features for inclusion in the interpretation.

**Fabric and Features** – Where industrial or maritime heritage fabric is discovered this will be incorporated into the designs and placed on public view to allow for full visual access and interpretation.

##### **Public Access and Interpretation:**

- Conserve heritage features discovered during earlier phases
- Full or partial pedestrian access to heritage features
- Interpretation displays

##### **Ongoing Heritage Management:**



- Ensure that the presentation of heritage forms a significant part of any publicly accessible spaces specifically interpretive facility.
- Facilities to provide educational and cultural value, supporting the broader context of the development and its relationship to local heritage.

#### Monitoring and Review:

- Continue to monitor the condition of the buildings and ensure their ongoing protection and to address any emerging risks or deterioration. These will include:
  - Annual updates to fabric condition reports by a conservation professional
  - Quarterly review of temporary measures previously implemented to maintain stability
  - Immediate response where buildings are identified as being at risk of sudden deterioration e.g. failure of roof covering or new observation of instability

The Phase II development does not include the repair and reuse of all the curtilage structures. These are not addressed until Phase III, which is not assessed here. Where curtilage structures are yet to be repaired there will be potential for them to continued decline, refer to 9.5.5 do-nothing, where phasing is considered. The operational impacts of the Phase II proposals have been assessed to be positive 9.5.4. The conclusion of the Phase II works will leave the site in use with several structures awaiting repair. The proposed operational phase mitigation measures help to enhance the redevelopment and protection of heritage assets, ensuring that the operational phase of the project contributes positively to the understanding and appreciation of the site's historical value.

## 9.8 RESIDUAL IMPACTS

### 9.8.1 Construction Phase Residual Impacts

Post-mitigation, the construction phase residual effects are as follows:

#### Visual and Setting Impacts:

Temporary changes to the visual character and setting of the surrounding area, particularly for architectural heritage. Impacts are generally:

- Slight to moderate in extent under a worst-case scenario.
- Wholly negative at first, becoming neutral to positive as construction progresses and the repaired mill and new structure becomes apparent.
- No direct physical effects on surrounding architectural heritage, but the setting may be temporarily affected.

#### Summary:

The residual impacts during the construction phase will include noise, dust, temporary visual changes, and potential indirect effects on the environment and heritage settings, even after mitigation measures are applied. **These will give rise to short term, moderate, negative effects.**

### 9.8.2 Operational Phase Residual Impacts

Tables 24, 25 and 26 present the 'Summary Assessment of Likely Effects and Residual Impact'. The summary assessment of residual impacts identifies Group 6 – *'Demolition of – portion of Weaving Mill*

*lean-to and portion of upstanding ruined wall / all of Offices and Laboratory / Semi-Detached Victorian Houses'* as resulting in direct, moderate, negative and permanent impact arising from the demolition of structures holding some degree of positive significance. Impact is mitigated through measures such as building recording and salvage of materials. Further to this, the final balance is reliant upon the positive reuse of the site and the conservation, repair and reuse of the more significant heritage structures, notably the protected structure of the Main Mill, which will come forward as part of a future phase.

In summary, the assessment of historic records, mapping and documentary sources, multiple visual inspection of the site and a review of the surviving architectural and cultural heritage and its significance has provided a reliable basis upon which to develop proposals and assess their impact upon the heritage significance of the site.

Mitigation is embedded in the design process with the phased approach to delivery of the development proposals. This approach has been designed to enable the long-term success of the masterplan vision through the delivery of Phase I as a priority and Phase II as a means with which to secure reuse of the disused Flaxmill Complex.

**The assessment of residual impacts has taken account of the proposed mitigation measures with the conclusion that the summary of the Phase II development proposals will result in permanent, significant and positive operational impacts.** The development will benefit the cultural legacy of the site and surrounding environment.

Traffic - Clear access routes shall be defined to maintain a safety margin between construction traffic passing historic structures. Keeping construction traffic away from the historic structures will minimise the risk of adverse impacts on the heritage.

| Protected Structures - GROUP 1                      |                                         |                          |                                      |                         |                          |                  |                                                                 |                       |
|-----------------------------------------------------|-----------------------------------------|--------------------------|--------------------------------------|-------------------------|--------------------------|------------------|-----------------------------------------------------------------|-----------------------|
| Architectural and Cultural Heritage Asset / Feature | Sensitivity                             | Impact Type              | PRELIMINARY                          |                         | Probability of Effects   | Types of Effects | RESIDUAL                                                        |                       |
|                                                     |                                         |                          | Quality of Effects                   | Significance of Effects |                          |                  | Integral Mitigation                                             | Likelihood of Effects |
|                                                     | <i>High / Medium / Low / Negligible</i> | <i>Direct / Indirect</i> | <i>Positive / Neutral / Negative</i> | <i>1 - 7</i>            | <i>Likely / Unlikely</i> |                  | <i>Design Measures</i>                                          |                       |
| Main Mill                                           | High                                    | Direct                   | Positive                             | 4 - Moderate            | Likely                   | Permanent        | Permitting access to allow for ongoing consolidation and repair | Positive - Moderate   |
| Chimney                                             | High                                    | Indirect                 | Neutral                              | 2 - Not Significant     | Likely                   | Permanent        | -                                                               | None Expected         |

Table 25 – Summary Assessment of Likely Effects and Residual Impact – GROUP 1



| Curtilage Structures - GROUPS 2 to 7                                                                                                                           |                                                                    |                                                |                                                                       |                                            |                                                           |                     |                                                                                                                                               |                                              |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------|------------------------------------------------|-----------------------------------------------------------------------|--------------------------------------------|-----------------------------------------------------------|---------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|
| Architectural and Cultural Heritage<br>Asset / Feature                                                                                                         | Sensitivity<br><i>High /<br/>Medium /<br/>Low /<br/>Negligible</i> | Impact<br>Type<br><i>Direct /<br/>Indirect</i> | PRELIMINARY                                                           |                                            | Probability<br>of Effects<br><i>Likely /<br/>Unlikely</i> | Types of<br>Effects | RESIDUAL                                                                                                                                      |                                              |
|                                                                                                                                                                |                                                                    |                                                | Quality of<br>Effects<br><i>Positive /<br/>Neutral /<br/>Negative</i> | Significance<br>of Effects<br><i>1 - 7</i> |                                                           |                     | Integral Mitigation<br><i>Design Measures</i>                                                                                                 | Likelihood and<br>Significance of<br>Effects |
| Group 2<br>Linen Store & O'Callaghan Strand Building                                                                                                           | Medium                                                             | Direct                                         | Negative                                                              | 4 - Significant                            | Likely                                                    | Permanent           | Retention of fabric and sustainable reuse                                                                                                     | Positive - Moderate                          |
| Group 3<br>Flaxmill Plaza and Boundary Wall                                                                                                                    | High,<br>Medium and<br>Low                                         | Direct                                         | Negative                                                              | 5 - Significant                            | Likely                                                    | Permanent           | Positive public reuse; retained and reused fabric; reinstatement of historic features                                                         | Positive - Significant                       |
| Group 4<br>Quarry, Reservoir and Infiltration Gallery + New PBSA accommodation.                                                                                | High and<br>Medium                                                 | Indirect and<br>Direct                         | Neutral                                                               | 4 - Moderate                               | Likely                                                    | Permanent           | Limited change to historic fabric with reuse proposed.<br>New buildings designed to respond to setting in form, scale, massing and materials. | Positive - Moderate                          |
| Group 5<br>Cheese Plant including the demolition of the warehouse & office                                                                                     | Medium and<br>Low                                                  | Indirect and<br>Direct                         | Neutral                                                               | 3 – Sight                                  | Likely                                                    | Permanent           | Removal of a negative structure and implementation of measures to conserve historic fabric.<br>Enhancement of setting.                        | Positive - Moderate                          |
| Group 6<br>Demolition – portion of Weaving Mill lean-to and portion of upstanding ruined wall / all of Offices and Laboratory / Semi-Detached Victorian Houses | Medium and<br>Low                                                  | Direct                                         | Negative                                                              | 5 - Significant                            | Likely                                                    | Permanent           | Minimal loss where possible. Positive reuse of fabric and creation of public realm                                                            | Negative - Moderate                          |
| Group 7<br>Demolition of upper reservoir structures + New apartment building and town houses.                                                                  | Negligible                                                         | Indirect                                       | Neutral                                                               | 3 – Sight                                  | Likely                                                    | Permanent           | Removal of negative structures.                                                                                                               | Positive - Moderate                          |

Table 26 – Summary Assessment of Likely Effects and Residual Impact – GROUPS 2 to 7

| Adjacent Sites - GROUPS 8 and 9                                                                                                         |                                         |                          |                                      |                         |                          |                  |                                                                                         |                                        |
|-----------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------|--------------------------|--------------------------------------|-------------------------|--------------------------|------------------|-----------------------------------------------------------------------------------------|----------------------------------------|
| Architectural and Cultural Heritage Asset / Feature                                                                                     | Sensitivity                             | Impact Type              | PRELIMINARY                          |                         | Probability of Effects   | Types of Effects | RESIDUAL                                                                                |                                        |
|                                                                                                                                         |                                         |                          | Quality of Effects                   | Significance of Effects |                          |                  | Integral Mitigation                                                                     | Likelihood and Significance of Effects |
|                                                                                                                                         | <i>High / Medium / Low / Negligible</i> | <i>Direct / Indirect</i> | <i>Positive / Neutral / Negative</i> | <i>1 - 7</i>            | <i>Likely / Unlikely</i> |                  | <i>Design Measures</i>                                                                  |                                        |
| <b>Group 8</b><br>Demolition of Fernbank House and Salesians Secondary School + Redevelopment with new apartment blocks and town houses | Low / Negligible                        | Indirect                 | Negative                             | 2 – Not Significant     | Likely                   | Permanent        | Retention of fabric as part of salvage strategy and sustainable reuse of the site       | Positive - Moderate                    |
| <b>Group 9</b><br>Demolition of 1990s warehouse. Adaption of boundary wall + creation of new mobility hub                               | Low / Negligible                        | Direct                   | Negative                             | 2 – Not Significant     | Likely                   | Permanent        | Positive public reuse; repaired historic fabric; designs that avoid and minimise impact | Positive - Moderate                    |

**Table 27** – Summary Assessment of Likely Effects and Residual Impact – GROUPS 8 and 9

| Heritage near the site (NIAH) - GROUPS 10, 11 and 12                                                |                                         |                          |                                      |                         |                          |                  |                                                                                                                            |                                        |
|-----------------------------------------------------------------------------------------------------|-----------------------------------------|--------------------------|--------------------------------------|-------------------------|--------------------------|------------------|----------------------------------------------------------------------------------------------------------------------------|----------------------------------------|
| Architectural and Cultural Heritage Asset / Feature                                                 | Sensitivity                             | Impact Type              | PRELIMINARY                          |                         | Probability of Effects   | Types of Effects | RESIDUAL                                                                                                                   |                                        |
|                                                                                                     |                                         |                          | Quality of Effects                   | Significance of Effects |                          |                  | Integral Mitigation                                                                                                        | Likelihood and Significance of Effects |
|                                                                                                     | <i>High / Medium / Low / Negligible</i> | <i>Direct / Indirect</i> | <i>Positive / Neutral / Negative</i> | <i>1 - 7</i>            | <i>Likely / Unlikely</i> |                  | <i>Design Measures</i>                                                                                                     |                                        |
| Group 10<br>Houses on the NIAH to the west and north – mostly dating from 1890-1930                 | Low                                     | Indirect                 | Neutral                              | 2 – Not Significant     | Likely                   | Permanent        | Scheme designs have sought to respond to context                                                                           | Neutral – Not Significant              |
| Group 11<br>Demolition of 1990s warehouse. Adaption of boundary wall + creation of new mobility hub | Low                                     | Indirect                 | Neutral                              | 1 – Imperceptible       | Likely                   | Permanent        | Designs for the redevelopment of the site are intentionally contextual, minimising the contrast with the historic setting. | Neutral – Imperceptible                |
| Group 12<br>Demolition of 1990s warehouse. Adaption of boundary wall + creation of new mobility hub | Low                                     | Indirect                 | Neutral                              | 1 – Imperceptible       | Likely                   | Permanent        | Designs for the redevelopment of the site are intentionally contextual, minimising the contrast with the historic setting. | Neutral – Imperceptible                |

Table 28 – Summary Assessment of Likely Effects and Residual Impact – GROUPS 10, 11 and 12



## 9.9 WORST CASE SCENARIO

Potential worst-case scenarios were considered during the impact assessment. Potential worst-case scenarios for built heritage included, for example, the loss of a significant protected structure without application of mitigation measures.

The construction phase mitigation measures guard against loss occurring during construction.

The development site is substantially disused with several important structures at risk of loss due to their deteriorated condition and lack of viable use in their current state. The progression of steps to enable the reuse of the site and protected structures will guard against their loss.

## 9.10 MONITORING

### 9.10.1 Construction Phase Monitoring

The development of the scheme must continue to place the protection of heritage at its core. This shall be achieved by ensuring appropriately qualified professionals and crafts persons are in place on both the employers' and contractors' teams to secure maximum benefit from the site and buildings heritage potential. These shall include conservation accredited Architects and Surveyors as well as appropriately qualified operatives including stone masons, joiners and lead workers. Where specialist work is identified the employment of an Icon registered specialist will be ensured. In the case of the Flaxmill structures, this will be most relevant to work to historic cast and wrought iron and evidencing conservation experience of a Construction Phase Project Manager.

Compliance – Weekly or fortnightly to suit the programme of works, inspections by an appropriately qualified professional to verify that construction activities are being carried out in accordance with the conditions of consent and the Heritage Strategy shall be carried out. If non-compliance is identified, actions to revise practices to bring them into compliance shall be implemented.

Documentation and Record-Keeping - Maintaining detailed records of monitoring activities, findings, and corrective actions for accountability and future reference shall be carried out.

Periodic Assessment of Condition and Stability - Structures including the Chimney Stack, Engine House, Water Tank Building, Infiltration Gallery, Lower Reservoir, and Dairy Buildings shall be subject to monitoring by a conservation accredited architect / surveyor. Annual assessment of condition shall consider the current and future risks at the time of assessment and must provide formal guidance to ensure appropriate protection measures are put in place to address any emerging concerns. The assessments will inform the prioritisation of repairs and allow for mitigation steps should the structures be found to be negatively impacted by ongoing construction activity.

These monitoring approaches ensure that the architectural and built heritage is appropriately considered and protected throughout the development process, aligning with EIAR requirements.

### 9.10.2 Operational Phase Monitoring

No post-development monitoring is anticipated in respect of architectural and cultural heritage as all identified impacts will be mitigated at the pre-construction and construction phases of the Proposed Development.

### 9.10.3 Overall Conclusion of Significant Effects

Following consideration of the residual effects (post mitigation) it is concluded that the Proposed Development will not result in any significant, negative effects on any of the protected structures.

Provided that the Proposed Development is constructed and operated in accordance with the design and mitigation described within this application, significant individual or cumulative effects on cultural heritage will not occur.

**In conclusion of the assessment the Proposed Development will give rise to significant, positive, permanent effects on cultural heritage.**

### 9.11 REFERENCES

- Special Interest – as defined under 2.5.4 of 'Architectural heritage protection – Guidance for planning authorities 2011'.
- EPA - Guidelines on the information to be contained in Environmental Impact Assessment Reports 2022
- Document – 'CRQMP-FCBS-XX-XX-RP-AA-000001-Masterplan Vision Document P01'
- Cleeve's Condensed Milk Factory originally Lansdowne Spinning Mill, North Circular Road, O'Callaghan's Strand, Limerick, LIMERICK - Buildings of Ireland
- Limerick Development Plan 2022-2028, Volume 1, page 319.
- Limerick Development Plan 2022-2028, Volume 1, page 201.
- Building-Height-Strategy-for-Limerick-City.pdf
- Statement of Significance, fig 17.
- Statement of Significance, fig 64.
- Statement of Significance, fig 56.
- Limerick-Development-Plan-Volume-1-Written-Statement-including-Variation-No-1.pdf
- Volume-2a-Limerick-City-and-Suburbs.pdf
- 3a-record-of-protected-structures-metropolitan-district-rev-a\_0.pdf
- Retail-Strategy-for-Limerick-Shannon-Metropolitan-Area-and-County-Limerick.pdf
- Building-Height-Strategy-for-Limerick-City.pdf
- Burra Charter, articles 2.2, 6, setting out a practical framework for decision making.
- Special Interest – as defined under 2.5.4 of 'Architectural heritage protection – Guidance for planning authorities 2011'.
- Architectural Design Report - section 2.5 and appendix E.
- Building-Height-Strategy-for-Limerick-City.pdf
- Cleeves Riverside Quarter – Illustrative Masterplan – Vision Document