

CHAPTER FOUR PROJECT SCOPING & ENGAGEMENT

4.1 INTRODUCTION

The Guidelines on the Information to be Contained in Environmental Impact Assessment Reports, May 2022 (EPA Guidelines) state that 'Scoping' is a process of deciding what information should be contained in an EIAR and what methods should be used to gather and assess that information. It is defined in the Environmental Impact Assessment of Projects Guidance on Scoping, European Commission (2017) (European Commission Guidance) as: *"the process of identifying the content and extent of the information to be submitted to the Competent Authority under the EIA process"*.

The purpose of EIA scoping and community engagement undertaken for this project was to obtain valuable information about the local community and environment. This information aids in identifying the likely significant effects of the proposed development on the surrounding environment and community. In addition, this information formed part of the key issues to be considered in the design of the proposed development.

The EIAR will address those aspects identified in Article 5 and Annex IV of the EIA Directive and Schedule 6 of the Regulations. The EIAR has been prepared in compliance with Section 3.3 of the Guidelines on the Information to be Contained in the Environmental Impact Assessment Reports, prepared by EPA (2022).

4.2 SCOPING

4.2.1 Scoping Approach

Mandatory scoping is not a requirement under the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018, although provision is made for optional scoping with An Coimisiún Pleanála under Article 117 of the Planning & Development Regulations 2001 as amended.

Whilst formal scoping was not undertaken, statutory authorities with a potential interest in the project were consulted. This comprises informal scoping where the sole intent is to gather as much information as possible relating to the site and development proposal.

The project was initially scoped with the applicant and within the design team based on the expertise and past experience of the EIAR contributors for similar projects. Existing structures and features on site and the cultural history of the site as detailed in Chapter 2.0 and Chapters 8.0 & 9.0 informed the overall approach to development, in tandem with Chapter 7.0 Biodiversity.

The scope of the EIAR, conducted in respect of the proposed development, is in accordance with the following statutory and guidance documents:

- Statutory requirements of the Planning and Development Act 2000, as amended and the Planning and Development Regulations 2001 as amended;

- Environmental Impact Assessment of Projects: Guidance on Scoping, European Commission, 2017
- Section 3.3 of the Guidelines on the Information to be Contained in the Environmental Impact Assessment Reports, prepared by EPA (2022)
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment August 2018, Department of Housing Planning & Local Government
- The requirements of Limerick City Council as detailed in the Limerick Development Plan 2022 – 2028.

The scope of the EIAR has also been informed by the concerns identified by third parties.

4.2.2 Scoping Consultation

The agencies consulted in the scoping exercise were selected from among the statutory consultees listed in Article 121 of the Planning and Development Regulations 2001 (as amended). The agencies were identified having regard to the characteristics of the proposed development, its location, and potential impacts and effects. A number of environmental non-governmental bodies were also contacted with specified interest in the matters pertaining to the proposed development (i.e., bats and birds). A written request for information was issued to the agencies in October 2024 having regard to the functions of the bodies in question and the likely significant effects associated with the proposed development.

The consultees were provided with information on the site and the proposed development. The purpose of the exercise was to gather any relevant information that they may have had on the site. Further they were invited to highlight any issues that they felt should be addressed within the scope of the EIAR. A copy of the Stakeholder Consultation Information Pack is detailed in Appendix 4.1.

Contact was made with 20 no. consultees and 9 no. responses were received as detailed in Table 4.1.

Table 4.1 EIAR Scoping Consultees		
Consultee Contacted	Response Received	Relevant Chapter
Development Applications Unit, Department of Housing, Local Government and Heritage	Email 27 th November 2024 confirming not in a position to comment at this time. Subsequent meetings held with NPWS and Built Heritage Unit as detailed in Table 4.5 below.	
Department of Environment, Climate and Communications	No Response	
National Transport Authority	Email 7 th November 2024 – lists number of strategies / studies to review and refer to.	Chapter 18.0 Material Assets – Traffic & Transport
Transport Infrastructure Ireland	Email 29 th October 2024 – no comment	
Office for Public Works	No Response	
Heritage Council	No Response	
Faite Ireland	No Response	
Arts Council	No Response	
Waterways Ireland	No Response	

Inland Fisheries	Email 06th November 2024 – Advised to address water quality and riverine impacts	Chapter 11.0 Water & Hydrogeology
An Taisce	No Response	
Southern Regional Assembly	No response to scoping received. Subsequent meeting was held 09 th December 2024 (see below on Consultation)	
Southern Regional Waste Management Office	No Response	
Health Service Executive	Email 01st November 2024 – Advised on information in Human Health Section and requested to include site construction and welfare facilities	Chapter 6.0 Human Health & Chapter 13.0 Noise & Vibration. A detailed CEMP has also been prepared
Health and Safety Authority	No Response	
Geological Survey of Ireland	Email 30th October 2024 - provided advice on where to source EIAR material and previous studies	Chapter 10.0 Land & Soils
Environmental Protection Agency	No Response	
Uisce Éireann	Email 19 th November 2024 - details requirements / mitigation proposals required in certain instances	Chapter 11.0 Water & Hydrogeology
Birdwatch Ireland	No Response	
Irish Aviation Authority	No Response	

A copy of the responses received are detailed in Appendix 4.2

By way of clarification, and with reference to the list of bodies provided under Article 121 of the Regulations, the following bodies were not contacted:

Table 4.2 Prescribed Bodies Not Consulted	
Statutory Body	Reason
Airport Operator	Development does not interfere with the operation and development of a licensed airport, whose annual traffic is not less than 1 million passenger movements
Córas Iompair Éireann and the Railway Procurement Agency	CIÉ is an operator within the Transport for Ireland (TFI) group, which is overseen by the National Transport Authority (NTA) and the NTA were contacted as the overarching body. The development will not have an impact on rail based transport.
Dublin Transportation Office	The development does not significantly impact on surface transport in the Greater Dublin Area,

Minister for Community, Rural and Gaeltacht Affairs and Údarás na Gaeltachta.	The development is not in a Gaeltacht area and the development does not materially affect the linguistic and cultural heritage of the Gaeltacht.
Minister for Justice, Equality and Law Reform,	The development is not in the vicinity of an explosives factory, storage magazine or local authority explosives store
Health Service Executive	The development was not considered to have significant effects on public health.
Minister for Communications, Marine and Natural Resources	The application does not seek to extract minerals within the meaning of the Minerals Development Acts, 1940 to 1995 and does not seek to impact the foreshore.

4.2.3 Scoping Findings

Table 4.3 below documents the scoping exercise undertaken in respect of this EIAR

Table 4.3 Scoping Exercise		
Environmental Aspect	Detailed Assessment	Justification
Population & Human Health	Yes	The proposed development has the potential to impact on population and human health, employment, local community and amenity uses, during the construction and operational phases.
Biodiversity	Yes	The site exists adjacent to the Lower River Shannon SAC. The River Shannon and River Fergus estuaries SPA exists just 28m from the site. There is also a reservoir, located between the Quarry site and the Flax Mill site. The groundwater levels and movement were assessed in a previous investigations and confirmed the presence of aquifers in the site bedrock and gravel layers in the overburden. The reservoir has been identified as being directly connected to the River Shannon and exhibits tidal movement. As a result, the proposal has the potential to input sediment and other substances which can become soluble or suspended in water into the estuary. The site also accommodates the Lesser Horseshoe Bat at certain times. The species appears to utilise the site for foraging purposes and roosting. The development proposal has potential impacts at construction and operation stages.

Cultural Heritage - Archaeology	Yes	The subject site is not located within any zone of notification of any recorded archaeological monuments and there are no known monuments either upstanding or subsurface. The subject site may have a relatively low potential for unrecorded archaeological remains of any period (prehistoric; medieval; post-medieval) in the main due to its proximity to the River Shannon. Two structures in the Cleeve's Factory Complex are designated protected structures; the main mill building (no. 264) and the octagonal brick chimney (no. 265). Any proposed development on the subject site may have a potential negative impact on the potential subsurface unrecorded archaeology of the site at construction stage.
Cultural Heritage – Architectural Heritage	Yes	Historical analysis has indicated that the original intention was for a mill complex capable of processing raw flax through to the weaving of linen. The original concept was largely and substantially realised between 1850-1855. As a surviving example of full-scale mechanisation of a fabrication process, the complex of buildings retains collective significance and is of both Architectural and Technical interest. The subject site has a number of architectural upstanding remains which are of architectural and historic interest, including two protected structures, which could be impacted at construction stage and operation stage.
Land & Soils	Yes	The groundwater levels and movement were assessed in a previous investigation and confirmed the presence of aquifers in the site bedrock and gravel layers in the overburden. The impacts on geology and land should therefore be assessed in terms of the groundworks, construction and operational phase of the proposed development. Contaminated land risk is considered to be a key risk for the subject site, based on previous land use, as outlined above, and taking account of historic ground investigation (GI) records. There is also potential ground gas risk associated with made ground beneath the site.
Water & Hydrogeology	Yes	The reservoir has been identified as being directly connected to the River Shannon. There is also a linkage (direct/indirect) between the site and SAC/Westfields Wetland. Groundwater levels have been assessed and associated structural impacts require assessment in terms of water quality during construction stage.

The Landscape	Yes	Given the scale and extent of the buildings proposed when compared to the existing suburban and low density nature of adjoining development, the LVIA will consider effects on the landscape character of the existing setting (i.e. as a result of the construction and existence of the proposed development) and visual impacts (i.e. the extent to which the proposed development when built will affect the landscape) during construction and operation.
Noise & Vibration	Yes	Construction and operational phases will have the potential to give rise to impacts relating to noise and vibration. A baseline noise survey has been undertaken to determine the prevailing noise level representative of the site and nearest noise sensitive locations.
Air Quality & Climate	Yes	Construction and operational phases will have the potential to give rise to air quality impacts, principally relating to traffic associated with the proposed development. Demolition is proposed which will generate dust. Historical reports confirmed that there was evidence of asbestos sheeting on the building in poor condition and asbestos was also observed in soils and on the ground around the buildings. The presence of asbestos fibres in dust is a primary concern in relation to air quality. In relation to climate the key constraints for the proposed development include GHG emissions from construction activities and materials. The choice of sustainable or lower embodied carbon materials can greatly reduce the GHG emissions associated with a development. Additionally, the vulnerability of development to future climate change is a constraint.
Microclimate – Pedestrian Wind Comfort & Distress	Yes	Given the height of the proposed buildings relative to the primarily low scale development adjoining the site, associated with existing wind patterns from the River Shannon, it is important to ensure that pedestrian safety and comfort is not compromised with respect to wind flow during operation and construction stages.
Microclimate – Sunlight Daylight & Shadow Analysis	Yes	Given the height of the proposed buildings relative to the primarily low scale development adjoining the site and the proposed nature of the residential use on site comprising apartments, it is necessary to demonstrate that the amenity of existing residents in the vicinity of the site are not significantly and adversely impacted and that future occupants living in the apartments can enjoy an adequate level of amenity at operation stage.

Material Assets - Traffic & Transport	Yes	The transportation chapter of the EIAR is required to present an assessment of the potential traffic and transport impacts of the proposed development during operation and construction stages. The assessment will be in compliance with the requirements set out within Traffic and Transport Assessment Guidelines TII, 2017.
Material Assets – Waste Management	Yes	Significant demolition is proposed which needs to be managed in the context of promoting a Circular Economy. The risk of asbestos onsite and removal of same needs to be considered. Similarly, the risk of disposal of contaminated soils/ water will need to be adequately assessed within this chapter, and appropriate mitigation measures applied during both construction and operation stages.
Material Assets – Utilities	Yes	A review of known onsite above ground and below ground utilities and managing the risk of the presence of unknown / unidentified utilities during construction is required.. Confirmation of Feasibility has been received from Uisce Éireann with respect to proposed water mains and foul mains supply for the development at operation stage.
Risk Management for Major Accidents / Disasters	Yes	The site is subject to flooding and could be subject to other natural disasters or incidents. It is thus necessary to ensure that the safety and precautionary measures necessary to protect the proposed development in the event of a major accident and / or natural disaster are identified and that appropriate mitigation measures are provided during both construction and operation.
Interactions	Yes	There is the potential for multiple direct or indirect effects (from various environmental aspects) to result in an accumulation or magnified effects from the proposed development.
Cumulative Impacts	Yes	The proposed development will be in proximity to other permitted and proposed development and thus has the potential to exacerbate or create larger, more significant effects

Scoping is considered to be an iterative process and is ongoing throughout the development and preparation of the EIAR. In practice, it has been undertaken on a continuous basis upon review of draft EIAR chapters and at fortnightly design team meetings.

4.3 ENGAGEMENT & CONSULTATION

4.3.1 Masterplan Stage

As referenced in Chapter 2.0, a Masterplan for development of the overall site was prepared, to provide the framework and vision for the future and creative re-use of this strategic city centre site and its valuable assets. It provided a broad framework intended to guide and coordinate development across

5.3 hectares of land. This stage is now complete and benefitted from extensive stakeholder engagement and public consultation.

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

The consultation and engagement process involved:

- Publication of information boards on the external boundary walls around Cleeves fronting onto North Circular Road.
- The initiation of a formal consultation process to secure submissions on the Masterplan concept.
- Extensive face to face briefings with key stakeholders.
- Presentation to the Elected Members on the proposed Masterplan.
- A comprehensive media information campaign surrounding the Masterplan designed to generate interest and encourage participation in the Masterplanning process.
- A public information campaign including advertisements, door to door leaflet drops, and an information briefing published for local residents and stakeholders.
- Direct briefings with a selection of community and environmental groups.

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

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

A number of environmental issues were raised relating to biodiversity, built heritage, material assets and microclimate. All public engagement and submissions received during the masterplanning process are detailed in a Stakeholder Engagement & Public Consultation Statement of Outcomes Report detailed in Appendix 4.3. This report also contains a design team response to all issues raised.

The feedback received has informed the second stage of the development process, relating to the preparation of the application for consent and the Environmental Impact Assessment Report (EIAR) for approval to An Coimisiún Pleanála.

4.3.2 Phase II Detailed Design & Application for Consent

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

Consultees were identified and all consultation undertaken has been recorded in Table 4.4 below.

Table 4.4 Stakeholder Engagement		
Stakeholder / Consultee Grouping	Member / Grouping	Engagement Type & Date
Limerick Twenty Thirty	Board Members	Continuous
	Internal Sections	Presentation 27 th May 2025
Limerick City & County Council	Senior Management	Presentation 03 rd June 2025
	Mayor of Limerick	Presentation 03 rd June 2025
	Elected Members	Event in Cleeves 04 th June 2025
	Departments - Planning (incl Built Heritage)	Meeting on 10 th October 2024
	Housing	Meeting on May 6 th 2025
	Traffic & Transport including Active Travel	Meeting on 28 th November 2024
	Flooding & Riverside	Meeting on 7 th November 2024 & 30 th May 2025
	Placemaking	Meeting on May 13 th 2025
	Climate Action	Meeting on 11 th April 2025
Neighbours & Occupants	St. Michael's Rowing Club	Meeting 03 rd June 2025
	Salesians Primary School	Meeting 03 rd June 2025
	Current Tenants within Cleeves	Meeting 03 rd June 2025
	Neighbouring Residents – Stonetown Terrace	Private meeting in Cleeves on 04 th June in advance of public consultation event
	Fernhill	
	Clanmaurice Avenue	
	Landsdowne Hall	
Infrastructure & Utilities	Uisce Eireann	Confirmation of Feasibility Received
Community	General Public	Public engagement session with displays on 4 th & 5 th June 2025
	Those who made submissions on Masterplan	

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

A total of 32 no. written submissions were received from members of the public following the consultation and engagement detailed above and in particular the public engagement sessions on the 4th & 5th June 2025 which had in excess of 160 no. attendees. A majority of the submissions were from neighbouring and adjoining residents. Whilst a number of submissions were supportive of the proposal and requested increased height and density, a majority of submissions raised issues of density, massing, scale, along with lack of facilities and opportunities for active recreation. All public engagement and submissions received during the detailed design process are detailed in a Stakeholder Engagement & Public Consultation Statement of Outcomes Report detailed in Appendix 4.4.

In addition to Scoping Requests issued to statutory bodies in the preparation of the Environmental Impact Assessment Report (EIAR), a number of structured meetings were undertaken as detailed in Table 4.5.

Table 4.5 Statutory Consultee Meetings			
Targeted Group	Meeting Date	Discussion	Relevant Chapter
Built Heritage Section, Department of Housing Local Government & Heritage	1 st Meeting - 03 rd June 2025 2 nd Meeting - 10 th July 2025	No demolition without reuse, heritage to be central, justify removal of boundary wall, need proposals for Flaxmill. Understand that the securing of the surviving historic fabric will form part of the initial building programme and enable the recovery of the key buildings overtime with a diversity of uses. O'Callaghan Strand building to be regraded to be in keeping with the scale, form and materiality of industrial complex. Materials from Fernbank House to be reused in-situ rather than salvaged. Consider re-use/adaptation of Fernbank rather than demolition. Reconsider removal of Victorian Houses, Fernbank House and Infiltration Gallery.	Chapter 8.0 - Cultural Heritage - Archaeology Chapter 9.0 - Cultural Heritage – Architectural Chapter 5.0 – Examination of Alternatives
National Parks & Wildlife Service	04 th April 2025	Public Lighting strategy important, Compatibility between ecology & proposed designs; Riparian corridor and connectivity strip required for bats; Swift considerations into buildings over 2 storeys; bat slates on Flaxmill; native planting; connectivity to Westfields for bats	Chapter 7.0 – Biodiversity Landscape & Public Realm Plan
Southern Regional Assembly	09 th December 2024	Supportive in principle of site redevelopment. Acknowledged urgent need for housing and the need to fast track housing for Stage I.	Chapter 5.0 – Examination of Alternatives Chapter 6.0 – Population & Human Health
Office of Public Works	30 th May 2025	Discussed Limerick City Flood Relief Scheme with appointed Engineer Designers. Confirmed scheme was at Optioneering Stage and flood	Chapter 11.0 – Water & Hydrogeology Chapter 21.0 – Risk Management for

		levels are similar to what was previously discussed. Flood levels provided from OPW Flood Relief Team.	Major Accidents / Disasters
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The development proposal has also been revised to address a number of concerns raised in the submissions received and in particular, in response to environmental concerns. These are considered further in Chapter 5.0 Examination of Alternatives.

For the purpose of responding to some of the more pertinent issues raised by the Statutory Authorities, the following moves have been made:

Built Heritage

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

National Parks & Wildlife

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

4.4 CONCLUSION

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

The issues raised through scoping and engagement have informed the overall design presented within the application for consent, resulting in a high quality, residential and public realm scheme. The proposal represents a positive and thoughtful approach to regeneration of the site. It will contribute to the enhancement of the area's urban character, both through the introduction of modern architectural design and the careful handling of the building's relationship with the surrounding urban environment. In terms of cultural context, the proposal respects the broader urban heritage and significance of the area while introducing a contemporary architectural language that complements the city's ongoing development.

4.5 REFERENCES

- Guidelines on the Information to be Contained in Environmental Impact Assessment Reports, EPA, May 2022
- Environmental Impact Assessment of Projects Guidance on Scoping, European Commission (2017).
- Statutory requirements of the Planning and Development Act 2000, as amended
- Planning and Development Regulations 2001 as amended;
- Guidelines on the Information to be Contained in the Environmental Impact Assessment Reports, prepared by EPA (2022)
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment August 2018, Department of Housing Planning & Local Government
- Limerick Development Plan 2022 – 2028.