

CHAPTER THREE PROJECT NEED & SPATIAL PLANNING POLICY

3.1 INTRODUCTION

Regeneration of the proposed development site, referenced in local planning documents¹ as ‘Cleaves’ is promoted at national, regional and local policy level, providing a solid planning framework for its development. The site is prioritised for investment under the Urban Regeneration and Development Fund (URDF), with enabling infrastructure and governance reforms supporting its transformation. There are a number of more strategic and generic policies and objectives influencing the approach to development on the site. The proposed development has been carefully considered and designed in the context of such strategic policy, mindful of environmental and social, obligations and targets.

This chapter of the EIAR provides an overview of the strategic policy supporting the development proposal. The purpose of this chapter is to demonstrate a plan – led approach to development and to highlight the core principles which has influenced the overall masterplan and design approach. It rationalises the overall approach to development on the site and will assist in consideration of a balanced approach to development and environmental factors on the site. This chapter does not assess the development proposal against national guidelines, as this element of consideration is dealt with in the Planning Compliance Report accompanying the development proposal.

3.2 INTERNATIONAL POLICY CONTEXT

3.2.1 United Nations Sustainable Development Goals 2015

The United Nations’ (UN) 17 Sustainable Development Goals (SDGs) provide a “shared blueprint for peace and prosperity for people and the planet, now and into the future” (Figure 3.1). They were



Figure 3.1 United Nations sustainable development goals (SDGs)

¹ Limerick Development Plan 2022 - 2028

adopted by the UN Member States – including Ireland – in 2015, as part of the adoption of the 2030 Agenda for Sustainable Development.

These high-level goals frame and inform Irish national agendas and policies to 2030, including (but not limited to) Project Ireland 2040 (National Planning Framework and National Development Plan) and the Southern Regional Assembly's Regional Spatial and Economic Strategy, discussed below.

The development goals have influenced the overall approach to the development proposal from masterplan concept to detailed design, resulting in a development with an acute focus on compact growth and mixed-use brownfield regeneration, adaptive re-use, reversal of vacancy and dereliction and sustainable travel.

In particular, the development supports Goal 11 in relation to Sustainable Cities and Communities through regeneration of a brownfield site into a vibrant mixed-use urban quarter, incorporating public spaces, pedestrian and cycle routes, and heritage conservation (e.g. Flaxmill and chimney) which enhances cultural and community value. The proposed development integrates climate-resilient infrastructure, including nature-based Sustainable Drainage Systems (SuDS), green roofs, and energy-efficient buildings. The use of photovoltaic panels and low-carbon mobility options (EV charging, mobility hub) supports reduced emissions.

3.3 NATIONAL POLICY CONTEXT

3.3.1 National Planning Framework First Revision 2025

The Revised National Planning Framework (NPF) approved in April 2025 sets out a strengthened vision for Limerick as one of Ireland's five key cities, with a focus on sustainable growth, compact urban development, and regional balance. In terms of its population growth target, Limerick is projected to grow to 150,000 people by 2040, an increase of approximately 44,000 from the 2022 Census baseline. The emphasis is on compact growth, with at least 50% of new housing to be delivered within the existing urban footprint. Limerick is positioned as a hub for Transport-Oriented Development (TOD), with growth focused around high-capacity public transport corridors. Strategic investments in sustainable mobility and infrastructure will support the city's growth and reduce car dependence.

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

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

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

- NPO 10 Deliver Transport Orientated Development (TOD) at scale at suitable locations, served by high capacity public transport and located within or adjacent to the built up footprint of the five cities or a metropolitan town and ensure compact and sequential patterns of growth.
- NPO 3 – Southern Region: approximately 330,000 additional people over 2022 levels (c. 450,000 additional people over 2016-2040) i.e. a population of just over 2 million.
- NPO 4 – A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs.
- NPO 7 Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements and ensure compact and sequential patterns of growth.
- NPO 8 – Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints and ensure compact and sequential patterns of growth.
- NPO 12 Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.
- NPO 13 Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.
- NPO 14 – Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets that can accommodate changing roles and functions, increased residential population and employment activity, enhanced levels of amenity and design and placemaking quality, in order to sustainably influence and support their surrounding area to ensure progress toward national achievement of the UN Sustainable Development Goals.
- NPO 16 – To ensure that the targeted pattern of population growth of Ireland's cities to 2040 is in accordance with the targets set out in Table 4.1. For Limerick, Table 4.1 sets a minimum population target of 150,000 people for 2040.
- NPO 20 - In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.
- NPO 22 - In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth.
- NPO 42 – To target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2040.
- NPO 43 – Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.
- NPO 44 – Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time.
- NPO 45 - Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration, increased building height and more compact forms of development.

- NPO 67 - Support the circular and bio economy including in particular through greater efficiency in land and materials management, promoting the sustainable re-use and refurbishment of existing buildings and structures, while conserving cultural and natural heritage, the greater use of renewable resources and by reducing the rate of land use change from urban sprawl and new development.
- NPO 89 - Protect, conserve and enhance the rich qualities of natural, cultural and built heritage of Ireland in a manner appropriate to their cultural and environmental significance.
- NPO 90 - Enhance, integrate and protect the special physical, environmental, economic and cultural value of built heritage assets, including streetscapes, vernacular dwellings and other historic buildings and monuments, through appropriate and sensitive investment and conservation

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

Key national policy objectives, including managing the circular economy, the sustainable reuse of materials and resources and the conservation of cultural and natural heritage have all informed the approach to development on the site.

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

3.3.2 Housing for All: A New Housing Plan for Ireland

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

- Preventing homelessness
- Protecting tenants
- Supporting social inclusion

The plan focuses on:

- Introducing incentives and measures to bring vacant and derelict properties back into residential use.
- Supporting homeownership and increasing affordability.
- Preventing homelessness, protecting tenants and supporting social inclusion and increasing social housing delivery.
- Increase the levels of new housing stock with the goal of ending homelessness by 2030.
- Achieve a more sustainable housing system with a planning system that is fit for purpose and that will create long-term vibrant communities with the necessary supporting infrastructure.

- Increasing the capacity and efficiency of delivery in both public and private sectors.
- Over 300,000 new homes to be built by 2030, including a projected 54,000 affordable homes for purchase or rent and over 90,000 social homes.
- Setting out a pathway to economic, societal and environmental sustainability in the delivery of housing.

The HFA is to be the largest State led building programme in its history and is financed by the biggest State funding commitment ever. It is apparent from the HFA plan that high-density housing is to be supported. Housing policy objective 11, no. 11.2 seeks to

"Develop section 28 Guidelines for Planning Authorities on Sustainable and Compact Settlement Guidance (SCSG), including guidance on housing typologies to facilitate innovative approaches to medium and higher densities.

Additionally, housing policy objective 12, no 12.2 is to deliver a new approach to active land management:

"Develop proposals for new Urban Development Zones, to DHLGH deliver a coordinated and transparent approach to the delivery of residential and urban development, particularly on brownfield sites, meeting the compact growth objectives of the National Planning Framework."

Furthermore, the HFA plan will drive economic sustainability and reduce constructions costs. Housing Policy Objective 23 states that the HFA plan will

"Reduce C&D waste and associated costs by working with the construction industry on demonstration projects to show how best practice (specifically in relation to urban high-rise apartment developments) waste segregation and other waste management measures, can reduce overall C&D disposal costs."

The plan seeks to ensure that new housing is delivered in an environmentally sustainable manner, with a greater proportion of residential development in the existing built-up footprint of towns and cities, and all new homes being built to Nearly Zero Energy Building (NZEB) standards, as well as a policy of retrofitting existing housing stock.

The proposed development provides for 234 no. new residential units and 270 no. new student bedspaces. It will contribute towards the government's target deliverance of housing, achieving compact growth and a high quality, sustainable development in a serviced, city centre location.

3.3.3 National Student Accommodation Strategy – Rebuilding Ireland (2017)

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

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

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

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

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

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

The NSAS identified that there was an unmet demand for 23,643 bed spaces in 2017 at a national level, the demand calculation data is based on students attending higher education institutions who have requested on campus accommodation against the number of bed spaces available on campus¹. The strategy projected that there would be an excess demand of 25,754 bedspaces in 2019 which is set to reduce to 20,986 bedspaces in 2024. The Strategy recognises that in order to comprehensively address the shortfall in student accommodation investment is required from both public higher education institutions and private developers.

The most recent progress report for the NSAS was published in Q3 2019. The report concluded that at the end of Q3 2019, 8,229 bedspaces were completed, 5,245 bed spaces were under construction and 7,771 bedspaces had been granted planning permission, this denotes a total of 21,254 bedspaces². Overall, this represents a shortfall in supply of 4,500 bedspaces based on the demand projections detailed in the NSAS. Whilst it is acknowledged that significant progress has been made in increasing the supply of purpose built student accommodation to meet the demand at a national level, it is evident that additional student accommodation is still required to meet the excess and growing demand.

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

3.3.4 Climate Action Plan 2025

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

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

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

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

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

The proposed development responds to these targets as detailed in Chapter 2.0 Section 2.5.15, by a range of energy reduction strategies aligned with Part L 2022 for Dwellings, including passive solar design through optimised glazing to balance daylighting, solar gain, and thermal performance. The residential apartment units have been designed to achieve A2 Building Energy Ratings (BERs), and the townhouses are designed to achieve A1 BERs.

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

The proposed development addresses the issues of sustainability in a number of ways promoting regeneration of a brownfield site, adapting and reusing heritage buildings of significance; reusing demolition material onsite insofar as possible; promoting compact development and modal shift away from use of the private car. The higher density achieved on this site located in the city centre, will contribute to the continued compact development of Limerick's existing urban areas. Several other documents enclosed with the planning application also outline sustainable design considerations.

An Energy Report, prepared under separate cover by ARUP, and referenced in Chapter 2.0 Section 2.5.13 of this EIAR details the approach to energy efficiency on the site for the residential properties at

the proposed new development. Chapter 12.0 Climate of this EIAR and Chapter 19.0 Material Assets - Waste Management further consider the issue of management in the face of climate change.

3.3.5 National Biodiversity Action Plan 2023-2030

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

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

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

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

Overall, the NBAP mandates that public bodies incorporate biodiversity objectives into their functions and report on related actions, as stipulated by the Wildlife (Amendment) Act 2023. This legal obligation ensures that biodiversity is a core consideration in public sector activities, including development and delivery of infrastructure.

3.3.6 Heritage Ireland 2030

Heritage Ireland 2030 is a cross-Government Strategic Policy for heritage that sets out a framework for the protection, conservation, promotion and management of Ireland's heritage. The Strategy lays out a roadmap for the best possible future for Irish heritage with a joined up approach at government, stakeholder and community levels. It adopts a whole-of-government, cross-sectoral approach, integrating heritage considerations into national and local policy frameworks to ensure long-term sustainability and public engagement.

The principal themes of the strategy are communities, leadership and partnerships. The proposed framework sets out structures through which all of these groups can come together to advance the

protection of Ireland's heritage. At the heart of Heritage Ireland 2030 will be the recognition of heritage as a bedrock of Ireland's identity, asserting how important heritage is to all objectives of government and to society generally. Heritage Ireland 2030 recognises the importance of heritage for its intrinsic value, for economic development, tourism and innovation and the role it plays in individual and societal well-being. The strategy embraces the diversity of heritage in the fabric of Ireland's multicultural society and will support inclusivity and engagement with all communities.

The masterplan for the site is based on a conservation led approach. Within this is the recognition that the loss of some fabric holding heritage significance will occur and that this is to be minimised. Change is to be focused in areas of greatest tolerance for change. Typically, this change will focus on areas where the fabric and character of the complex can benefit from interventions that remove elements that erode the legibility of significance. This is the order of change that is necessary to permit the long-term sustainable reuse of the complex.

3.4 REGIONAL POLICY CONTEXT

3.4.1 Regional Spatial and Economic Strategy for the Southern Region 2020

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

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

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

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

public transport services by connecting people to larger scaled settlements delivering these services”.

The proposed development at Cleeves on a city centre site, promoting higher density development in the context of an overall mixed use development masterplan promotes the use of walking and cycling along with public transport, within a 10 minute of services and facilities.

3.4.2 Limerick Metropolitan Area Strategic Plan (MASP)

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

The RSES sets out seven Metropolitan Area Goals, the following of which the proposed development will help deliver:

Goal 1: Sustainable Place Framework - This proposal will:

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

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

- Healthy city and healthy metropolitan area status with equity of access to health services, high ratios of access to quality open space and recreational amenities per population and attractive options to uptake active travel between home, work, education and access to services.

- Set a high quality performance standard for Limerick City to transition towards a zero-carbon future, achieve improved water and air quality, improved sustainable travel and other environmental and health performance standards as indicators for the healthy status of our metropolitan areas. This will be facilitated through a strong emphasis on using nature based solutions that contribute to multifunctional, connected blue green infrastructure.
- Foster a creative metropolitan area with vibrant cultural, arts and heritage scenes.

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

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

3.5 LOCAL POLICY CONTEXT

3.5.1 Limerick Development Plan 2022 - 2028

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

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

The World Class Waterfront development is a key revitalisation and transformation project under the Limerick 2030 Plan. The World Class Waterfront project comprises three elements – the Riverside Infrastructural Works, Cleeves Riverside Quarter and the University of Limerick City Campus. The

project focuses on mixed-use brownfield regeneration, adaptive re-use and reversal of vacancy and dereliction in Limerick City Centre. The Development Plan acknowledges that the World Class Waterfront project will deliver on the NPF objectives of compact growth, sustainable mobility and placemaking/ public realm, which has the potential to make a transformational difference to Limerick City. In combination, the three elements of the project will facilitate an increase in the population residing and working in the City Centre,

The site has two land use zonings afforded to it in the Development Plan Whilst most of the site is zoned for 'City Centre' mixed uses, Stonetown Terrace is largely zoned for 'Existing Residential Use'. The objective of existing residential use is *"to provide for residential development and to protect and improve existing residential amenity"*. The landuse zoning objective for the 'City Centre' seeks:

"To protect, consolidate and facilitate the development of the City Centre commercial, retail, educational, leisure, residential, social and community uses and facilities"

whilst the stated purpose of the landuse zoning objective is:

"To consolidate Limerick City Centre through densification of appropriate commercial and residential developments ensuring a mix of commercial, recreational, civic, cultural, leisure, residential uses and urban streets, while delivering a high-quality urban environment which will enhance the quality of life of residents, visitors and workers alike".

Cleeves is identified as one of a number of Strategic Employment Locations in the city (Objective ECON O17). In accordance with Objective CGR03 of the Development Plan, a masterplan has been prepared for the site to enable the coherent and sustainable development of the lands. In this regard the developed Masterplan is intended to set out the framework for the sustainable, phased and managed development of Cleeves and provides a practical phasing strategy for the site which can be submitted with the proposed Phase II to demonstrate an integrated and considered approach.

The Development Plan focuses delivery of tall buildings in the City Centre, with tall building clusters encouraged on the Cleeves site (Objective CGR O9) having regard to its location at a major crossing point on the River Shannon. The Development Plan acknowledges the Cleeves site as the only major development opportunity on the right bank of the Shannon and should take its essential character as a gateway and vista of and from the City. Further consideration of compliance with the Development Plan and its policies is provided in the Planning Report accompanying the application for consent under separate cover.

3.5.1 Limerick Climate Action Plan 2024 - 2029

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

The plan is built on five key thematic areas:

- Buildings and Energy;
- Transport;

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

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

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

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

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

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

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

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

3.5.2 Limerick 2030 – An Economic and Spatial Plan for Limerick

The proposed development is being delivered within the framework of an overall Vision and specific plan for the spatial and economic development of Limerick City centre comprising the Limerick 2030 - An Economic and Spatial Plan for Limerick. The Plan, prepared by LTT, is a once in a generation plan developed to guide the economic, social and physical renaissance of Limerick City Centre and the wider County/Mid-West Region. Whilst prepared by LTT, the Plan has informed the preparation of the Limerick Development Plan 2022 – 2028² which states that the Council will have regard to the plan³. The 20-year action plan was published with a top-line target of €1 billion in enterprise and investment infrastructure and 12,000 jobs. These targets have already been surpassed.

However, Limerick city centre continues to lack the vibrancy and critical mass of other cities. The proposed development, as identified in the Plan, represents a unique opportunity to develop a high quality mixed-use development of scale which will secure the long term transformational and rejuvenation of a brownfield city centre site. The total cost of the proposed project, as supported in the Plan, is estimated at €450 million, including an estimated €175 million for the development proposal.

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

3.6 CONCLUSION

Cleaves is a strategic site which can deliver on 'compact growth' focusing on a more efficient use of land and resources through reusing previously developed and under-utilised land and buildings all in accordance with the policy objectives of the National Planning Framework (NPF).

The RSES sees Cleaves and its redevelopment as a growth enabler for the city. Its regeneration and re-development can not only achieve the economic and social objectives associated with the targeted population growth for Limerick City in a sustainable manner, but it can also act to revitalise Limerick city and reposition it as a world-class City in Ireland and Europe.

This policy at national and regional level is translated at local level through the Limerick Development Plan which recognises Cleaves as a strategic city centre site with potential for increased building height with tall building clusters encouraged on the site whilst conserving and facilitating the adaptive re-use of a number of protected structures and other historic buildings.

²Section 1.5.7 of Limerick Development Plan 2022 - 2028

³ Section 3.2.3 of Limerick Development Plan 2022 - 2028

The policy analysis undertaken demonstrates that there is a clear need for the proposed development, in terms of delivery of sustainable, high density residential and student accommodation in a city centre site

3.7 REFERENCES

United Nations Sustainable Development Goals 2015

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