

ENVIRONMENTAL IMPACT ASSESSMENT REPORT

VOLUME III APPENDICES

Appendix 4-3 Masterplan Consultation Report





**Cleeves Riverside Quarter
Masterplan
Stakeholder Engagement & Public
Consultation**

Statement of Outcomes

September 2023



DEVELOPMENT PLANNING | ENVIRONMENTAL PLANNING | MASTERPLANNING

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1.0 INTRODUCTION

1.1 Background

The ambition of Limerick Twenty Thirty (LTT) is to revitalise the Cleeves site and surrounding area to deliver a world class proposal in Limerick's urban core. The development seeks to achieve a number of primary objectives:

- supporting the growth of a strong local economy;
- encouraging and facilitating new business investment;
- retaining and integrating the historic buildings and site industrial heritage with contemporary buildings;
- accommodating a mix of uses anchored by a public realm that relates and links to the city core and the River Shannon, whilst implementing high-quality urban design, with sustainable and innovative design.

Once fully developed, the site has the potential to accommodate future population growth through residential unit provision and to further promote a strong local economy through the creation of employment and new local attractions, thereby encouraging and facilitating new business investment.

In response to the requirements of the Limerick Development Plan 2022 – 2028, a masterplan has been prepared to present design solutions that are both sustainable and innovative, that integrate the historic buildings and industrial heritage within the proposed development and include a public realm space that relates both to the urban core and the River Shannon. It provides a broad framework intended to guide and coordinate development across 5 hectares of land. Whilst the masterplan has been prepared as a non-statutory document, it does consider the future of various constituent elements that will be needed to create an exemplar urban quarter that will be an attractive cultural hub destination, offer new gathering spaces for the city and community and act as a catalyst for new models of sustainable urban living and working.

The masterplan essentially provides the framework for Limerick Twenty Thirty's vision for the future and creative re-use of this strategic city centre site and its valuable assets.

1.2 Structure of Engagement and Consultation

To inform the preparation and design of the Masterplan, Limerick Twenty Thirty undertook a stakeholder engagement and public consultation process. Meaningful engagement is fundamental to the overall masterplan approach and is intended to:

- Provide stakeholders with the information they need to participate in a meaningful way;
- Assist Limerick Twenty Thirty in understanding their concerns;
- Provide an opportunity for Limerick Twenty Thirty to explain and rationalise the proposed development concept; and
- Advise how and when further public input will be facilitated.

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 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.
- A social media campaign to drive awareness, engagement and attendance across LinkedIn, Facebook and Twitter channels.
- Direct briefings with a selection of community and environmental groups.

1.3 This Report

The purpose of the Statement of Outcomes document is to act as a testament to the consultation process and provide an accurate record of feedback received. It presents the findings from the stakeholder engagement and public consultation process. The report has been compiled to analyse the submissions and to summarise the key themes and issues emerging from different groups of respondents. All submissions have been considered thematically with reference to the issues raised;

The statement is presented in seven sections:

- Section 1.0 provides the Introduction.
- Section 2.0 provides an overview of the Masterplan and helps set the context for issues raised in the stakeholder engagement and public consultation process.
- Section 3.0 of the report provides details on the consultation and engagement process and presents a profile of the respondents who made a written submission or engaged with Limerick Twenty Thirty.
- Section 4.0 provides an overview of the issues raised during the engagement and consultation process and details the evolving themes which are addressed in Section 6.0.
- Section 5.0 deals specifically with issues raised by statutory consultees.
- Section 6.0 rationalises and addresses the issues arising under each theme raised by stakeholders and the public. A response is then provided by Limerick Twenty Thirty to each issue / theme raised.
- Section 7.0 concludes the report, providing guidance and direction on potential future engagement and consultation opportunities.

2.0 MASTERPLAN VISION & FRAMEWORK

2.1 Site Location & Context

The Cleeves site has a unique location, situated to the north-west of the River Shannon, yet also being assigned part of the City Centre Area. The river visually separates the site from the main city which allows it to form a stronger relationship with the immediate context west of the river. Local residential neighbourhoods and educational facilities, public parks and sports facilities, as well as the Westfield Wetlands (part of the SAC) are all comfortably reachable within a 10-25 minute walk.

The site's favourable location adjacent to the Shannon Bridge allows direct access across the river to the city centre, with local facilities along the docks, the hospital and the train station sitting within a 15 minute walk radius. Condell Road which runs past the site into the City Centre is the main route between Shannon Airport and the City itself. Therefore, the site will not only benefit from direct and easy access to the airport but also has the opportunity to form a gateway to the City, welcoming local and international visitors.

The existing character of the riverine landscape has always been an important part of the character of Cleaves, though much has been lost following the walled enclosure of the Cleaves site. There is an opportunity to re-create this link to the river both in terms of opening up the landscape and creating new landmark buildings. There are five distinct but yet permeable areas identified within the overall Cleaves site, each with their unique and distinct character.

The dominant cliff faces of the quarry and the reservoir's breadth of water make this a unique opportunity for an interface of active amenity and biodiversity in the city. The Cleaves scheme will offer distinct spaces that do not replicate the amenities and character of other urban spaces but will complement them. In this way, the Cleaves site is to be seen as a part of a suite of public realm spaces across the city.



Figure 1.0 Site Context

2.2 Vision Framework

An integrated masterplan underpinned by a resilient and phased design approach is proposed, that:

- Enhances engagement with the city and celebrates the rivers' edge by opening up the Flaxmill site to the river, offering a new riverside vantage point, activating the Shipyard site edge with water-

related boating uses. The masterplan responds to the surrounding natural ecosystems and biodiversity, creating an enhanced and accessible public promenade linking O'Callaghan Strand to the Westfields Wetlands.

- Harnesses the value of the unique industrial heritage at Cleeves by organising the Quarter around spaces anchored by the specific heritage elements – Flaxmill buildings and Engine House; Chimney/Water Tank House/Infiltration Galleries; Reservoir/ Quarry, thus amplifying the unique nature of the site and its specific sense of place.
- Creates a vibrant public realm at the heart of the Quarter that links the diverse character areas whilst forming a spine that connects from the Riverside to the Reservoir/ Quarry
- Strengthens connections to the city by an enhanced realm for pedestrians, cyclists and boaters, promoting sustainable modes of movement, with potential for a mobility hub connecting public transport on Condell Road with facilities for shared bikes, scooters etc.
- Creates a permeable and inviting Quarter, enhancing neighbourhood and urban connectivity by pedestrian and visual linkages from Condell Road through to the Flaxmill site and from the upper Salesians and Stonetown Terrace sites to the Reservoir.
- Optimises compact development within the site constraints, whilst respecting visibility of the heritage fabric by concentrating massing away from views of the Flaxmill façade and iconic chimney from the wider context.
- Integrates a diverse and complementary mix of Working, Living and Learning uses, in a public realm offering settings to enable benefits to be gained from synergies between different groups, strengthening a sense of community.
- Provides a Resilient Response to the environmental and climate setting through designing with sustainable initiatives and optimising massing for quality internal and external spaces, with a diverse range of uses.
- Sets out a sustainable incremental phasing strategy with new phased connection routes that enhance the site's dynamic terrain.

2.3 Development Concept

The Masterplan has been prepared in response to the requirements for a coordinated and holistic approach to development on the Cleeves Site as detailed in the Limerick Development Plan 2022 – 2028. The development concept as illustrated in Figure 2.0, provides a flexible and phased approach to development. It demonstrates the potential of the site to accommodate a mix of uses with a suggested 60% of the site dedicated to commercial floorspace; 30% dedicated to residential use; and 10% dedicated to mixed use purposes. Importantly, the uses on site can evolve and change over time in response to changing demands and economic conditions.

The site, as considered, has the potential to accommodate:

- Between 240 – 290 no. residential units up to 2028 (current Development Plan period) with further residential capacity beyond that period;
- Between 35,000sqm – 36,500sqm of commercial floorspace; and
- Between 5,000sqm – 6,500sqm of mixed uses

An alternative development concept was also considered which included for student accommodation. That alternative scenario provided for:

- Circa 275 no. student residential bed spaces on the quarry site;
- Between 180 - 220 no. residential units up to 2028;
- Between 35,000sqm – 36,500sqm of commercial floorspace; and

- Between 5,000sqm – 6,500sqm of mixed uses

Alternative options for incorporating residential units on the Shipyard and North Circular Road sites were also considered in the Masterplan process which would increase residential supply on site to 331 no.units.

Further to the creation of a new living and working quarter in Limerick City, Cleeves will also function as a destination for visitors and other city dwellers. The site will link with the river releasing more of the quayside for public use and linking with existing riverside walks. The development will open up to the public with extensive public realm proposals incorporating public uses, new urban streets, park walks and a public plaza, all providing for communal spaces, community hubs and public uses. A generous civic plaza in the forecourt of the historic Flaxmill is pivotal to the overall Masterplan concept, formed and anchored by the heritage buildings. Activated by mixed public uses in the heritage and new buildings on its edges, it offers a strong public focus for the new Riverside Quarter.

Residential use is primarily located on the Salesians, Quarry and Stonetown sites to respond to the neighbouring residential context, with the ground level allocated to mixed use to provide opportunity for an active public realm between the buildings and existing reservoir.

Commercial development is prioritised along the North Circular Road on the Shipyard, Infiltration Gallery and Flaxmill sites.

The massing strategy focuses on optimising compact development whilst respecting the historic context. It seeks to be sympathetic to the surrounding local context whilst engaging with the waterfront and enhancing visibility of the Cleeves site as a landmark development.

The Salesians and Stonetown site to the north respond to the immediate context of low- to mid-rise buildings and the existing Flaxmill building on site, with massing stepping between three and six storeys. South-west of the site on the Shipyard, a new iconic marker is proposed along the riverfront, with the taller element forming a relationship with both the Riverpoint development across the Shannon and the existing Chimney Stack on site.

The Cleeves site is centrally located in Limerick City and is well served by public transport connections. The Masterplan approach for all options has been to reduce on-site car-parking, as supported by national, regional and local policy, in combination with increased parking for bikes. Enhanced connectivity with the established city centre will be promoted and supported, including provision of a proposed new pedestrian bridge extending from the site across the River Shannon, to be delivered as part of the World Class Waterfront Initiative.

Urban Regeneration Development Fund (URDF) funding to the tune of €34.5m will assist in the realisation of the public realm strategy for Cleeves, thereby unlocking the site for development. The committed funding, which must be spent in the short term, demonstrates support for the project and acknowledges alignment of the project with the National Development Plan and Regional Strategy for the Southern Region.

Figure 2.0 may need to be updated following review of quantum of accommodation by FCB

RESIDENTIAL (UNITS)

Quarry*	60 - 70 Units
Stonetown Terrace	40 - 60 Units
Salesians Site	130 - 150 Units
NCR and O'Callaghan Strand**	10 - 20 Units

*an additional option has been explored to provide circa 275 student residential beds

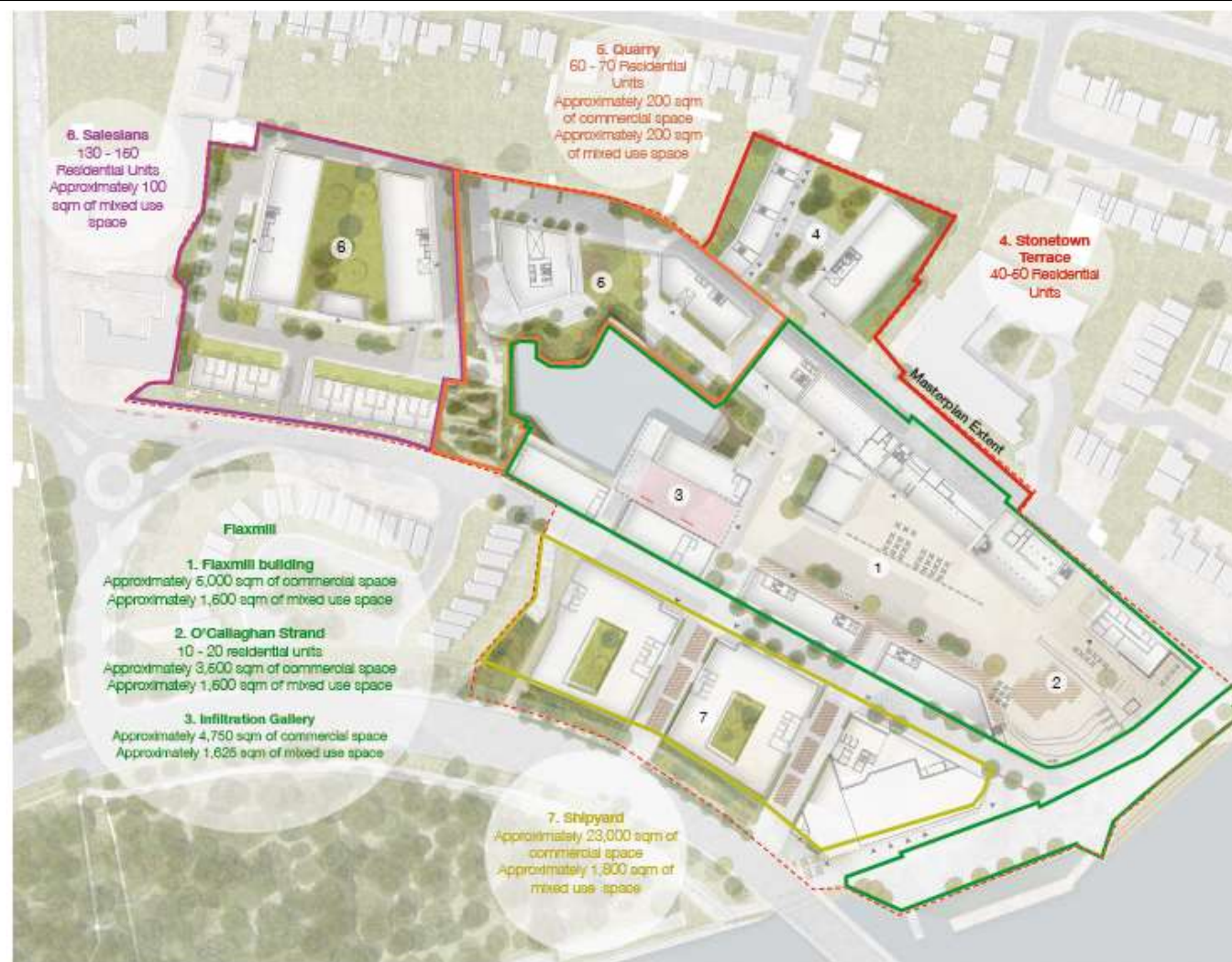
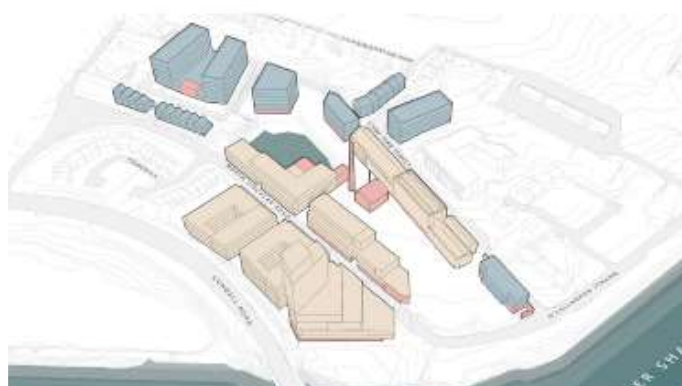
COMMERCIAL (GIA)

Flaxmill	4,000 - 5,000 m ²
Quarry	160 - 260 m ²
Infiltration Gallery	3,600 - 6,000 m ²
NCR and O'Callaghan Strand **	3,000 - 4,000 m ²
Shipyard **	22,000 - 23,600 m ²
Total	35,000 - 36,600 m ²

MIXED USE (GIA)

Flaxmill	1,200 - 2,600 m ²
Quarry	160 - 260 m ²
Salesians Site	90 - 120 m ²
Infiltration Gallery	1,000 - 2,250 m ²
NCR and O'Callaghan Strand	1,000 - 2,000 m ²
Shipyard	1,600 - 2,000 m ²
Total	6,000 - 6,600 m ²

**potential other uses have been explored for these sites

Axonometric - Mix of uses

Plan view of the proposed Masterplan for the Cleaves Site

Key of uses across the site

- Live
- Mixed Use
- Commercial

Figure 2.0 Masterplan Development

3.0 ENGAGEMENT AND CONSULTATION PROCESS

A key pillar of the 'Aarhus Convention', ratified by the Irish Government in June 2012, concerns Public Participation in Environmental Decision-Making. This requires public authorities to enable the public to comment on proposals for projects, plans and programmes relating to, or affecting, the environment. It also provides that *"Each Party shall provide for early public participation, when all options are open and effective public participation can take place"*. The Aarhus Convention forms a key context within which Limerick Twenty Thirty's consultation approach was advanced.

3.1 The Approach

The overriding philosophy of Limerick Twenty Thirty is to manage communications and to proactively disseminate information in a planned and systematic manner, to consult with stakeholders at key stages of the Cleeves project life cycle, and to continuously evaluate the effectiveness of the strategy and make adjustments to increase its effectiveness over all phases.

The objectives of the Stakeholder Engagement and Consultation Process is to:

- Describe the approach to community engagement and stakeholder management for the project; Identify how community engagement and stakeholder management issues pertaining to the proposed development have been managed;
- Identify the main stakeholders, their issues and concerns, influence, and participation levels; and
- Identify key messages to be used in communicating with stakeholders and the project phases where they are likely to be impacted or interested.

Throughout the life of the project, the Stakeholder Engagement and Consultation Process will be regularly reviewed and will continue to be iteratively shaped and adapted to reflect the needs of the community and key stakeholders as the partnership grows and changes and new issues emerge.

It is important to note that the aim of engagement and consultation is not to reach consensus on all issues, particularly considering the diversity and subjectivity of views in development projects. It would be highly unlikely that all groups would reach final agreement on any given issue. Any lack of final agreement does not indicate a weakness in the consultation approach; in fact, a robust consultation process will be strong enough to capture diverse and often contradictory inputs and views, all of which may be considered as part of the consultation.

3.2 The Process

In designing a consultation process, Limerick Twenty Thirty recognised that one size does not fit all, and that a tailored approach was required if consultation was to be successful. For this reason, a mixture of public consultation and targeted consultation was adopted, including:

- Online Consultation – A dedicated page to Cleeves is facilitated on the Limerick Twenty Thirty website, with relevant background information, a link to information boards, and a Masterplan Submission Form for feedback - <https://limerick2030.ie/portfolio/cleeves-riverside-campus/>
- Open Space Consultation – Recognised as one of the most effective ways to consult with diverse groups, public information and engagement evenings were organized on the Cleeves site with public information boards on initial concepts and designs; a 3-d model of the intended design concept and a QR code to facilitate the making of an online submission. Members of the design

team and Limerick Twenty Thirty representatives were available to engage, discuss and address queries arising.

- Round-table Sessions – A series of round-table sessions with targeted groups was facilitated. Initial concepts were presented, targeted issues were discussed, and feedback was received.
- Pen and Paper Consultations – This approach involved an independent review of the consultation material and a written submission to the project team. The approach was informally used by some members of the public, notwithstanding it was not promoted by Limerick Twenty Thirty.

3.2.1 Briefings & Workshops

A number of briefings and workshops were undertaken with targeted stakeholders. Written invitations were issued to the following stakeholders, detailing an overview of the project and an invite to meet with the project team -

- Office of Public Works (OPW)
- National Parks & Wildlife Service, Department of Housing, Local Government & Heritage (NPWS)
- Built Heritage Section, Department of Housing, Local Government & Heritage
- Limerick City & County Council Technical Staff (LCCC)
- Limerick City & County Council Senior Management
- Conservation Officer, Limerick City & County Council
- Salesians Primary School
- St. Michael's Rowing Club
- Limerick City & County Council Elected Members
- Limerick City & County Council Forward Planning Section
- Shannon Regional Conference & Sports Bureau
- Discover Limerick DAC

Targeted Group	Event Date	Event Format
OPW	15 th February 2023	Site visit, briefing and discussion
NPWS	14 th February 2023	Online briefing and discussion
LCCC Technical Staff	19 th January 2023	Briefing and Discussion
LCCC Senior Management	09 th March 2023	Briefing and Discussion
Conservation Officer, LCCC	08 th March 2023	Site visit, briefing and discussion
Salesians Primary School	20 th March 2023	On-site briefing and discussion
St. Michael's Rowing Club	28 th March 2023	On-site briefing and discussion
LCCC Elected Members	22 nd March 2023	Presentation and discussion
Shannon Regional Conference & Sports Bureau	19 th April 2023	Briefing and discussion
LCCC Forward Planning Section	05 th May 2023	Briefing and discussion
Discover Limerick DAC	06 th June 2023	Briefing and discussion

Table 1.0 Targeted Stakeholder Briefings & Workshops

3.2.2 Public Consultation

A room within the Flaxmill building was cleared and made suitable to host a public consultation event and to accommodate members of the public. Detailed presentation boards and a 3-d model were prepared as visual aids to encourage and facilitate interaction and discussion.

Two public consultation evenings were facilitated on the evenings of the 28th and 29th March 2023. Design Team Members and Limerick Twenty Thirty staff were available on the evening to discuss the proposals with the public and address queries.

The events were widely publicised with notices in print media (Limerick Leader and Limerick Post) and online (Limerick Leader and Limerick Twenty Thirty online). A signed letter to neighbours was issued on the 13th March 2023 and a mail drop was undertaken to neighbouring residents in Fernhill, Clanmaurice Avenue, Landsdowne Hall and Stonetown Terrace.

Significant numbers attended the event on both nights as illustrated below. A QR code was available to facilitate online submissions.



3.2.3 *Media & Publicity*

Further promotional work was undertaken by Limerick Twenty Thirty to raise awareness, encourage debate and facilitate discussion. All social media platforms were used including LinkedIn, Twitter and Facebook to promote the Cleaves site and the preparation of a Masterplan. Two Press Releases were issued, a promotional video was launched online and Limerick Twenty Thirty CEO gave a number of radio interviews

3.3 *Written Submissions*

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; Associations, Voluntary Bodies, Sports Groups and Business Associations; and
- 1 no. submission from a statutory consultee.

In the case of submissions from the general public, the majority of submissions were from neighbouring and adjoining residents. In general, all submissions were supportive of the redevelopment of Cleaves and in general welcomed the development. However, issues of density, massing, scale and intended uses were all raised as specific issues.

The submissions from groups and associations included Resident Associations, Voluntary Bodies, Sports Groups and Business Associations. The Voluntary Bodies mainly comprised health and safety organisations operating in the local area, looking for facilities and premises within the development. The Sports Organisations were very much water-based groupings, with an emphasis on canoeing and swimming. Again, these organisations were mostly seeking facilities and premises within the development but also offered interesting potential uses of natural features within the development including the quarry face and infiltration gallery.

The submission from the statutory consultee was An Taisce, primarily concerned with the heritage on site and which is dealt with in detail in Section 5.0 of this Statement.

4.0 **ISSUES RAISED**

The stakeholder engagement and public consultation process raised a number of similar issues in respect of the Masterplan. In order to avoid undue duplication, it is proposed to group the submissions into themes and to holistically address all issues on a thematic basis. The identified themes with broad brush issues are detailed in Table 2.0 with each theme identified in detail in Section 6.0 of this Statement.

In keeping with Data Protection legislation, individual submissions received will not be published.

Theme	Specific Issues
Residential Use	– Need much greater residential provision – 300 units not ambitious enough. – Need a stronger residential quarter within the development. – Need quality living with significant private open space – need family living space not apartments. – Need more innovative apartment layouts with communal spaces and opportunities for working at home. – A gated community aspect should be provided within the development for security purposes. – Need more houses at front of site overlooking the river. – Housing is not noted as a key objective in the Masterplan. – More text on the type and mix of housing to be provided. – Objecting to student accommodation. – No student housing and concern TUC may take over and develop into a third level campus.
Mixed Uses	– Need a greater mix of uses – medical facilities, convenience stores and sports halls. – Too much office space at 36,000sqm which has the capacity to accommodate 2,000 office workers. – Too much new commercial space in the city – Providing 6,000sqm of retail/services space on site will compete with the city centre – vacancy in city centre is already at 16.9% which is too high. – Distribution of mixed uses on site is unbalanced and more mixed uses are required on the shipyard site to facilitate engagement at street level. – Promoting the Pump House as a small Theatre venue is such a good idea. – Need a strong tourism focus. – Industrial Museum should be proposed in the ground floor of Cleaves – need to offer tourist facilities. – Need something like W5 Belfast within the development to attract tourist and facilitate creative space. – Need a Convention Centre – Need to maintain educational use – expansion area required for primary school and Salesians should be kept as educational use. – Need a foodhall / casual dining similar to other cities including Stockholm and Seville. – Need studio spaces for creative people
Recreational Uses	– Maintenance of sporting facilities including Rowing Club very important. – Need more of a connection between the site and the existing River Pathway. – Inclusion of water-based leisure and sporting activities in the masterplanning process and in particular at the reservoir should be considered. – Need to tie in with Active Cities Project – developing amenities and providing opportunities for physical activities. – Need for swimming pool – develop part of the river into a swimming pool. – Should provide for Garden Allotments.

	– Insufficient amenity space – Need a park on the northside like Mungret. Shelbourne Park is not enough. – Need facilities for youths to congregate at night. – Less concrete, more green spaces. – Need more trees in the development – too much concrete and not enough greenery. – Open space needs to be covered – not practical otherwise. – Proposals for a vibrant public area with canopy is very welcome. – Expose the cliff face connecting to the LETSS building complex – this will mean omitting an apartment block and relocating elsewhere. – Use quarry face for rock climbing or as an outdoor cinema.
Density Height & Massing	– Density is too high - gentle density required. – Height of buildings should be maximum four stories. – Buildings should not be higher than the existing Salesians School. – Height should not be greater than Strand Hotel – Buildings not in keeping with heritage of the site or settled nature of the area. – Proposed 16 stories is too high – particularly when this is the only site that can be developed in the O’Callaghan Strand/North Circular Road/Ennis Road area. – Right to Light in afternoons – impact on light in Fernhill – Imposing height on rear gardens in Clanmaurice Ave, causing overlooking and overshadowing and an invasion of privacy.
Traffic, Mobility & Pedestrian Connectivity	– Lack of parking an issue – Increased congestion particularly at Old Westfield and Clanmaurice Ave – Need safe lock up facilities for bicycles. – Roundabout at Shelbourne Road / North Circular Road to be upgraded. – No North Circular Road runs through the campus, is very busy and will result in accidents– need a pedestrian underpass or overpass bus stop in the area to transport people and no car parking on site proposed. – No space provided for public transport. – Need for a Mobility Plan and Traffic Assessment along with a Public Transport Improvement Plan. – Traffic should be omitted from roads and only allow public transport through the site. – Need a pedestrian bridge to connect with the city. – Stonetown Tce should not be used for access to housing identified as Site No.3 – access should be via main site. – Waste trucks currently collect waste bins from outside Fernhill, as waste trucks cannot enter development – this arrangement must be able to continue. – Development must be linked to the rest of the city.
Sustainability & Climate Change	– Must be at the heart of development – building materials, alternative energy etc. – Key focus required on climate change mitigation. – Impact of scale of development on floodplain – What protection is there for Fernhill from flooding.

	Noise pollution during construction
Biodiversity	- Presence of starlings on site – red listed bird of high conservation concern - No evidence of environmental survey informing the Masterplan - More emphasis on retaining and reinforcing biodiversity is required.
Built Heritage	- Need to consult beyond the Protected Structures Register when deciding what structures and buildings to keep / not to keep. - Need to keep Fernbank House – one of the early original homes on NCR. - Removing the walls around Cleeves is the wrong thing to do. - Defining the boundary of the site is a good thing - examples in Berlin. - Want to keep the existing Cleeves wall without making access to Stonetown Tce.
Implementation & Delivery	- Next stage of masterplan should prioritise the design and delivery mechanism for the housing and identify suitable funding. - No indication of how residential units will be delivered – do not want pension funds etc. - Need European examples of other exemplar projects – the focus should not solely be from the UK.
Requested Premises & Facilities	The following organisations have requested dedicated premises and facilities: ~ Ennis Road First Responders ~ Shannon Dragons and Shannon Paddlers with specific reference to the reservoir and need for storage facilities and changing rooms. ~ Swimming Limerick ~ Haven Hub – Suicide Prevention Centre ~ Local café operator seeking premises.
Other	- Residents are not listened to. - Residents of Old Westfields not included in 3d model. - Limerick Twenty Thirty Board of Directors – no Councillor representation on the Board from the Ward.

5.0 STATUTORY CONSULTEE SUBMISSION

One submission was made by a statutory consultee, namely An Taisce.

5.1 Issues Raised

An Taisce welcomed the Masterplan for the site but considered a stronger residential quarter should be provided. They detailed that attracting people back to live in the heart of Limerick City is necessary for a sustainable, thriving and climate resilient city. They would like to see a focus on climate change mitigation and resilience throughout the design, protection of the natural heritage of the river, and protection of its invaluable public amenity. There should be more of a connection between the site and the River Path and it should remain publicly accessible.

The built industrial heritage should be heralded more and in particular Fernbank House, which is important to the architectural heritage of Limerick city should be retained. An Taisce also seek retention of the boathouse with its unique steel framed structure and spiral cast iron staircase.

The submission notes that the development should be fully served by walking, cycling and public transport given its location in Limerick city. On surface and underground private car parking will induce private car traffic.

5.2 Response to Issues

5.2.1 Residential Provision

One option in the Masterplan proposes between 240 – 290 no. residential units up to 2028 (current Development Plan period) with further residential capacity beyond that period. The other option proposes circa 275 no. student residential bed spaces on the quarry site, with potential for between 180 - 220 no. residential units up to 2028. The Limerick Development Plan 2022 – 2028 estimates in its Residential Settlement Capacity Analysis that circa 250 no. residential units could be accommodated on the site during the plan period.

The Masterplan has been prepared under the umbrella of national regional and local planning policy. Within the Regional Spatial and Economic Strategy for the Southern Region (RSES) there is a Metropolitan Area Strategic Plan (MASP) for Limerick City. The MASP supports a number of key infrastructure and transformative projects within Limerick City and specifically identifies Cleeves as one of the key strategic sites which will contribute to the transformation of the city. Cleeves is identified as an employment location, suitable for a mix of uses including education, tourism and commercial space. Within the Limerick Development Plan 2022 – 2028 (LDP) Cleeves is identified as one of a number of Strategic Employment Locations in the city (Objective ECON O17). Further Objective CRQ O1 in the Development Plan details that a number of requirements in any redevelopment proposal on the site must provide for “*a high-quality urban design solution with a mix of uses*”.

Thus, the site has been identified at regional and local level for primarily employment uses. It is therefore important that the site is not overtly residential in nature and that a focus is maintained on employment uses and mix in order to satisfy regional and local policy. However, as policy changes and the site evolves, further provision for residential use on the site can be accommodated in certain locations, and following a revision of the Core Strategy as currently detailed in the Limerick Development Plan 2022 - 2028

5.2.2 Climate Change Mitigation

A sustainable development starts with the community, creating a neighbourhood that encourages and enables a low-impact lifestyle. This approach naturally incorporates climate change measures into the development from the outset. The environmental strategy seeks to adopt:

- Fabric-first principles to minimise heat loss.
- Solar design to maximise beneficial solar gains, and reduce overheating.
- Green roofs providing extensive on-site biodiversity.
- Sheltered outdoor spaces to enable year-round use.
- Climate beacon chimney shifts colour according to energy status of site.
- Environmental canopies provide protection from rain and wind while generating energy with solar PVs. and
- Efficient and low carbon materials prioritised to reduce embodied carbon.

The Masterplan approach embraces operational and embodied carbon emissions, including the construction, replacement and maintenance cycles and what happens to the building at the end of its life. The Sustainability Statement and Approach is set out in Section 9 of the Illustrative Masterplan.

5.2.3 Protection of the River

The existing character of the riverine landscape has always been an important part of the character of this site, though much has been lost following the walled enclosure of the Cleaves site. The Masterplan proposes to re-create this link to the river through opening up the landscape for use by the wider public, as well as improving public access to the waterfront through a riverside promenade, which can link with the existing River Path via a connected route under the Condell Road.

An AA Screening report was prepared to assist determination as to whether the proposed development is likely to give rise to potential for significant effects on the Natura 2000 network that would cause a requirement to undertake 'Appropriate Assessment', specifically the Lower River Shannon cSAC (Site code 002165) and the 'River Shannon and River Fergus Estuaries' SPA (site code: 004077).

The report confirms that whilst the project is unlikely to result in direct effects by way of loss or fragmentation of the Natura 2000 network, the potential for secondary indirect effects by way of water quality issues, cannot be ruled out without further assessment and consideration of mitigation practices. This assessment thus recommends Stage 2 Appropriate Assessment, which shall be undertaken at project specific stage.

5.2.4 Built Industrial Heritage

Conservation is often referred to as a process of 'managing change'. In order to inform the masterplan principles for an approach to the heritage buildings, the significance of each building on the Flaxmill and Shipyard sites has been undertaken. The conservation objective has been to preserve one of the most significant flax mills in Northern Europe for new life; enhance the industrial axis with a new transformative programme of cultural, education, commercial and residential uses; and strengthen the site's relationship with the water. The Vision Document has been informed by a detailed Statement of Significance relating to the heritage buildings on site, which have been classified into high, medium, low and negative significance. This Statement of Significance has informed the overall reuse strategy for the site.

Deemed to be of 'medium significance' in the Statement of Significance, there is a proviso that Fernbank House could be deemed more important once its history is better known. The public consultation has provided significant additional information on Fernbank House, which will need to be assessed as the Masterplan progresses to the next stage.

Presently, it is proposed to demolish the two houses fronting onto North Circular Road to enhance accessibility and movement within the proposed masterplan development and to facilitate linkages with the existing Fernhill residential development. The proposed connectivity and access strategy at this location strives to provide direct linkages to the quarry area which is to be developed as a significant amenity area not only to serve the proposed development, but also the wider area. There is a significant level difference at the location of Fernbank House and connectivity at this point can only be achieved with the removal of the house, in order to facilitate steps and a ramped access providing access from North Circular Road to the proposed amenity area.

With respect to the boathouse, a balance needs to be struck between opening up the rivers edge for the benefit of the greater good, facilitating permeability and increasing connectivity with the Wetlands. The aim

of the masterplan is to bring people into contact with the river, enabling engagement with the water and create space for water sports, and gatherings. The existing boathouse occupies almost the totality of the waterfront fronting Cleeves and without its removal, this part of the waterfront will remain effectively in private use, with little opportunity to increase connectivity under the Condell Road.

5.2.5 Traffic

The Masterplan design is focused on the provision of high-quality spaces for pedestrian movements, thus enhancing the attractiveness of this travel mode among residents and visitors. Its close proximity to the city facilitates walking and cycling trips, with a proposed new pedestrian/cycle bridge further increasing this connectivity with the city centre.

Short-stay and long stay cycle parking will be accommodated on site and in particular will cater for the convenience needs of visitors, with small clusters of cycle stands located in highly-visible locations close to building entrances.

Residential car parking will be provided at limited numbers across the site in an average ratio of 0.42 spaces per unit. This is consistent with LCCC's car parking policy and with the development ethos, which strives to discourage the use of cars as a regular travel mode. Similarly, office car parking will also be provided at a limited quantum. The development will include the accommodation of shared mobility options, including a residential car club which would provide a number of car-sharing spaces for private use of the residents, and the potential expansion of the city-wide Tfl (Transport for Ireland) Bikes or emerging dockless bike or e-scooter schemes.

The closest local bus stops to the site are located northeast of the site, along the R45 Ennis Road, accessible by a 6-minute walk. A submission has been made to the National Transport Authority in respect of the proposed BusConnects proposal for Limerick City, seeking provision of a bus stop on the Condell Road to serve the development proposal.

6.0 THEMATIC ISSUES

6.1 Residential Use

- Need much greater residential provision – 300 units not ambitious enough.
- Need a stronger residential quarter within the development.
- Need quality living with significant private open space – need family living space not apartments.
- Need more innovative apartment layouts with communal spaces and opportunities for working at home.
- A gated community aspect should be provided within the development for security purposes.
- Need more houses at front of site overlooking the river.
- Housing is not noted as a key objective in the Masterplan.
- No text on the type and mix of housing to be provided.
- Objecting to student accommodation.
- No student housing and concern TUC may take over and develop into a third level campus.

The need for greater housing provision in Limerick City is recognised by Limerick Twenty Thirty. However, the provision of housing and the national objective to provide for compact growth in our cities, needs to be balanced with the policy objectives for the site established at regional and local level. As already detailed in Section 5.2.1, Limerick Twenty Thirty has had to balance the provision of residential and employment

uses on the site given identification of the site as a Strategic Employment Location in the Regional Spatial and Economic Strategy for the Southern Region (RSES) and the Limerick Development Plan 2022 – 2028. It is considered that the site may have potential for additional housing following either a revision of the core strategy for the city and / or the current plan period, post 2028. Alternative options for incorporating residential units on the Shipyard and North Circular Road sites were also considered in the Masterplan process which would increase residential supply on site to between 270 – 325 units.

National Policy Objective 10 as set out in the National Planning Framework (NPF) promotes compact growth which means higher densities in our towns and cities. In response to this objective, the Limerick Development Plan 2022 – 2028 specifies that city centre sites, such as the subject site, accommodates minimum densities of 100 units per hectare. An apartment unit is the only unit typology capable of achieving such densities. There is significant 'family living space' on adjoining neighbouring sites comprising detached and semi-detached units. The proposed apartment typology will facilitate mixed housing provision in the area. Although the unit mix has not yet been defined (this will be defined at planning application stage), there are different ways to live at Cleaves Riverside Quarter, possibly with outright purchase, low -cost sale schemes, shared ownership, and opportunities for both social and private renting. Each phase of the development will include a variety of accommodation from one and two bed apartments up to three bed family townhouses. The possibility for student residential use has also been explored.

The Development Plan and Urban Design Manual: A Best practice Guide promotes connectivity and linkages within and between developments. The provision of a 'gated community' type development would contravene these principles and would not be acceptable from a proper planning and sustainable development perspective. The intent from the outset has been to open the Cleaves site to the city and to the general public, to effectively re-link the site to the water's edge.

The Masterplan does provide for some residential units to the front of the site overlooking the river on the northern boundary opposite Stonetown Terrace. However, a balance needs to be struck in managing the provision of residential uses on site and the flooding extents which currently characterise the site. However, it is noted that the Limerick Flood Relief Scheme will positively benefit the site in the future and is likely to significantly mitigate future flood risk to the site. Along with balancing the flood risk, it was also considered that commercial / mixed uses proposed at ground floor level would provide for more activity and vibrancy within the central open areas and public realm fronting the river. In the future, following implementation of the flood relief scheme for Limerick and following the preparation of a new development plan for the city in 2028, consideration could be given to further residential uses overlooking the river.

As detailed in Section 2.3 of this report, consideration has been given to a further mix of residential units on site with the introduction of student housing. It was considered that, dependent on the final uses proposed for the Flaxmill Building and other community / mixed use areas, student housing could complement possible educational uses, including potential educational uses arising from the Memorandum of Understanding with the Technological University of the Shannon Midlands Midwest (TUS).

6.2 Mixed / Commercial Uses

- Need a greater mix of uses – medical facilities, convenience stores and sports halls.
- Too much office space at 36,000sqm which has the capacity to accommodate 2,000 office workers.
- Too much new commercial space in the city
- Providing 6,000sqm of retail/services space on site will compete with the city centre – vacancy in city centre is already at 16.9% which is too high.

- Distribution of mixed uses on site is unbalanced and more mixed uses are required on the shipyard site to facilitate engagement at street level.
- Promoting the Pump House as a small Theatre venue is such a good idea.
- Need a strong tourism focus.
- Industrial Museum should be proposed in the ground floor of Cleeves – need to offer tourist facilities.
- Need something like W5 Belfast within the development to attract tourist and facilitate creative space.
- Need a Convention Centre
- Need to maintain educational use – expansion area required for primary school and Salesians should be kept as educational use.
- Need a foodhall / casual dining similar to other cities including Stockholm and Seville.
- Need studio spaces for creative people.

The development options advanced in the Masterplan, as detailed in Section 2.3 of this report, provides for significant commercial and mixed use space within the Cleeves site. Justification for the commercial floorspace has already been detailed in response to the An Taisce submission (Section 5.2.1) and under Residential Use (Section 6.1). Essentially the site has been identified as a Strategic Employment Location in the Regional Spatial and Economic Strategy for the Southern Region (RSES) and the Limerick Development Plan 2022 – 2028 and therefore must accommodate a significant quantum of commercial / mixed use, employment generating floorspace.

The specific intended use for the mixed use floorspace has not been determined as part of the Masterplan and will be subject to ongoing discussion as development progresses on the site and a planning application is prepared. Limerick Twenty Thirty has consulted extensively on the use of the site including consultations with the Technological University of the Shannon Midlands Midwest (TUS); Shannon Regional Conference & Sports Bureau; Discover Limerick DAC; and St. Michaels Rowing Club. The public has detailed some potential uses for mixed use areas within the site, which could be accommodated in the future, but which is dependent on future operating and funding considerations. At this stage, the important consideration is the balance of uses proposed across the site, which can be adapted in the future as the need and demand from operators arise.

Consultation has been undertaken with Salesians Primary School with respect to their spatial requirements and shall continue during the development process, until a clearer understanding of all constraints and opportunities are understood. The Salesians Primary School will remain in operation as a school. This is a 2-3 storey building which directly abuts the site boundary. Provision has been made for 30 no. grade parking spaces for the primary school teachers, which has been integrated into the Masterplan Options.

In consideration of the uses on site, regard must be had to the city centre location and city centre zoning afforded to the site. Whilst it is not the intent of the site to compete with the traditional city centre from a retail and services perspective, nonetheless a level of retail and service use shall be required to accommodate and support a vibrant and active community at this location. As stated in the submissions received, foodhalls, casual dining and cafés shall be required.

6.3 Recreational Uses

- Maintenance of sporting facilities including Rowing Club very important.
- Need more of a connection between the site and the existing River Pathway.
- Inclusion of water based leisure and sporting activities in the masterplanning process and in particular at the reservoir should be considered.

- Need to tie in with Active Cities Project – developing amenities and providing opportunities for physical activities.
- Need for swimming pool – develop part of the river into a swimming pool.
- Should provide for Garden Allotments.
- Insufficient amenity space
- Need a park on the northside like Mungret. Shelbourne Park is not enough.
- Need facilities for youths to congregate at night.
- Less concrete, more green spaces.
- Need more trees in the development – too much concrete and not enough greenery.
- Open space needs to be covered – not practical otherwise.
- Proposals for a vibrant public area with canopy is very welcome.
- Expose the cliff face connecting to the LETSS building complex – this will mean omitting an apartment block and relocating elsewhere.
- Use quarry face for rock climbing or as an outdoor cinema.

A Landscape Strategy including a review of Limerick's civic spaces and public parks was undertaken to inform the Vision Document. The strategy identified that there is limited amenity on the northern side of the River Shannon. Whilst the subject site will not be able to address all recreational deficiencies in the area, it can facilitate significant soft and hard public open space, for the benefit of existing and proposed new residents.. The amenity potential of the quarry and reservoir area will have a mix of active and passive uses and will primarily comprise of soft / green landscaping. This area is a space for the city, and supports the amenity spaces for the residential areas of Stonetown Terrace, Salesians, and the Quarry. In contrast, the area around the Flaxmill and Riverfront are harder and more civic in use and provide opportunities for city-scale events and water-based activities.

The aim is to leave the space in front of the sunlit Flaxmill façade open in order to give space for the building to stand out. This will also offer a flexible space for events in the middle, with café terraces along the sun-lit edge. The North facing side of the Flaxmill plaza will be populated with seating, trees and planters, still allowing a free movement through the space. Trees and planting also offer wind protection from the South-West winds.

The Quarry area, with its dramatic walls and reservoir form a unique space in the city. Both the reservoir and the quarry walls enclosing the space define its unique character and will remain visually connected within the open space of the quarry area, and through to the Flaxmill. The masterplan also opens up a new view from the Flaxmill Square across the reservoir to the quarry walls. Exposing the cliff faces is an integral part of the design proposal as it reflects the heritage of the area. The quarry area is a sun trap sheltered from the wind, making a warm, sheltered - and quite rare- microclimate in Limerick. A public park, including a play space with a special character relating to the cultural and natural heritage of the site is provided in the area with opportunities for more activities including wall climbing.

It is acknowledged that shelter in the public realm is important to encourage use, and to offer shelter from the weather: The Vision document explores different shelter options and provides potential options including a solar energy collecting canopy which creates a transition space between the Flaxmill space and the riverside, offering a venue for gathering, viewing of water events, pop-up seasonal water related activities etc. Opposite the Flaxmill an overhang offers a place of shelter from which to view events in the main space, and a sheltered route to the reservoir space beyond.

Many important considerations have been raised in the submissions received, with a particular emphasis on water sports. There is potential accommodation for St. Michaels Rowing Club on the Shipyard site, incorporating boat storage at the riverside level, facilitating access to the water and existing pontoon, whilst releasing more of the quayside for public use. Boating activity at this location will activate the riverside walk and facilitate a connection between the pedestrian promenade on O'Callaghan Strand and the walkway at Westfields wetlands. Above, with connection from the Condell Road, a viewing terrace overlooking the river will offer access to the training and social areas of the rowing club. The eastern end of the Flaxmill space opens up to the river's edge, with large seating steps for riverside viewing (boat races etc).

In addition to accommodating St. Michael's Rowing Club, around the Quarry side of the reservoir, communal spaces open onto a south facing stepped edge and boardwalks along the waterside. The reservoir could potentially be used for many different recreational facilities including watersports.

Above the Infiltration Galleries, a shared covered space allied with a community hub space overlooking the reservoir, offers a venue for gatherings or informal events (a possible place for the youth). Vertical connections along the west edge of the water tank house could offer access to the brick arched galleries beneath.

6.4 Density Height & Massing

- Density is too high - gentle density required.
- Height of buildings should be maximum four stories.
- Buildings should not be higher than the existing Salesians School.
- Height should not be greater than Strand Hotel
- Buildings not in keeping with heritage of the site or settled nature of the area
- Proposed 16 stories is too high – particularly when this is the only site that can be developed in the O'Callaghan Strand/North Circular Road/Ennis Road area.
- Right to Light in afternoons – impact on light in Fernhill
- Imposing height on rear gardens in Clanmaurice Ave, causing overlooking and overshadowing and an invasion of privacy.

The Building Height Strategy for Limerick, as contained in the Development Plan, promotes increased building height at Cleeves. The strategy states that *'taller, landmark, gateway and city landmark buildings' as defined in the 'Tall Building Classifications', are appropriate*". However, it does acknowledge the lower scale of buildings predominant in the area. In response to this the strategy states *"It is recognised that there may be an impact on neighbouring residential buildings as the height is generally lowline in the surrounding area. However, there is a high quality townscape and placemaking argument which can be deemed appropriate for an area of height due to the nature of the site....."*

The massing strategy proposed in the Masterplan is sympathetic to the surrounding local context whilst engaging with the waterfront and enhancing the visibility of the Cleeves site as a landmark development. The Salesians and Stonetown site to the north respond to the immediate context of low- to mid-rise buildings and the existing Flaxmill building on site, with massing stepping between 3 and 7 storeys. To the south-west of the site on the Shipyard, a new iconic marker is proposed along the riverfront forming a relationship with both the Riverpoint development across the Shannon and the existing Chimney Stack element on site.

National Policy Objective 10 as set out in the National Planning Framework (NPF) promotes compact growth which means higher densities in our towns and cities. Further, the Urban Development and Building Height Guidelines for Planning Authorities 2018 provide support for taller buildings and highlight the importance of facilitating taller buildings, particularly proximate to city centres. In response to this objective, the Limerick Development Plan 2022 – 2028 specifies that city centre sites, such as the subject site, accommodates minimum densities of 100 units per hectare. Accordingly, the development must proceed with higher densities, in contrast to prevailing densities in the area and in accordance with the requirements in the Development Plan provides residential uses on site at a rate of circa 133 units per hectare.

The Development Plan focuses delivery of tall buildings in the City Centre, with tall building clusters encouraged on the Cleeves site (Objective CGR O9). For the purposes of the Masterplan, the following heights have been considered:

- The Townhouses along the North Circular are 3 storeys high to reflect the immediate residential scale in this location. The residential blocks at the upper level of the site (Salesians site) are 7 storeys (undercroft parking plus 6 levels of living), aligned along a North/South axis to minimise overlooking and overshadowing, whilst allowing light through to the rear gardens of Clanmaurice Avenue.
- Within the quarry site in front of the reservoir there are two blocks of 5 storeys (commercial at L00) plus 4 storeys of residential above) and 7 storeys (commercial at L00 and 6 storeys of residential above). These blocks are framed by the high quarry wall to the rear and the long rear gardens of Clanmaurice Avenue which ensures no overlooking / overshadowing of residential units occurs.
- On the Stonetown Terrace site, the residential proposal provides a 3 storey residential block with an apartment at ground floor level and duplex units above. A 5 storey residential block (undercroft parking at L00 and residential above) is aligned along a North/South axis to the rear of Landsdowne Hall.

Whilst overlooking distances and overshadowing distances have been considered when setting out the height, scale and locations of the proposed residential blocks, central to the consideration of taller buildings on the site will be assessments including the micro-climatic effects, down-draught and amenity considerations including daylight and sunlight. These detailed studies will be undertaken at planning application stage and will ultimately dictate the height of buildings on the site.

Fernhill and Rosehill Residential Developments have been considered whilst developing the Masterplan to minimise negative impacts that new developments may cause, but also to integrate them into the development proposal by providing direct access from the quarry and reservoir site through to North Circular Road. A garden linking Condell Road to the North Circular Road offers a green buffer to the Fernhill residences. The office building form steps from 4 to 6 to 8 storeys, rising towards the Shannon bridge to form a landmark 16 storey tower at the waterfront, a gateway to the city.

6.5 Traffic, Mobility & Pedestrian Connectivity

- Lack of parking an issue
- Increased congestion particularly at Old Westfield and Clanmaurice Ave
- Need safe lock up facilities for bicycles.
- Roundabout at Shelbourne Road / North Circular Road to be upgraded.
- No North Circular Road runs through the campus, is very busy and will result in accidents– need a pedestrian underpass or overpass bus stop in the area to transport people and no car parking on site proposed.
- No space provided for public transport.
- Need for a Mobility Plan and Traffic Assessment along with a Public Transport Improvement Plan.

- Traffic should be omitted from roads and only allow public transport through the site.
- Need a pedestrian bridge to connect with the city.
- Stonetown Terrace should not be used for access to housing identified as Site No.3 – access should be via main site.
- Waste trucks currently collect waste bins from outside Fernhill, as waste trucks cannot enter development – this arrangement must be able to continue.
- Development must be linked to the rest of the city.

Having regard to the ambitious targets which are set out in the Climate Action Plan for the transport sector, Limerick will see a significant transition to sustainable and active modes of travel in the coming years. The transport approach and strategy for the Cleeves site has been carefully considered and is being driven by existing policies at national, regional and local level. The Masterplan design is focused on the provision of high-quality spaces for pedestrian movements, thus enhancing the attractiveness of this travel mode among residents and visitors. Its close proximity to the city facilitates walking and cycling trips, with a proposed new pedestrian/cycle bridge further increasing this connectivity with the city centre. The overall approach therefore is to focus on sustainable modes of transport. Any alternative approach would not conform with current thinking and policy.

Two primary vehicular access points will be provided into the Cleeves site with separate access facilitated to the Shipyard site off the North Circular Road. The Salesians site will be accessed via a new access off North Circular Road, located in between the terrace of three storey housing units fronting onto the road. The second access will be provided off O Callaghan Strand to the proposed residential units in Stonetown Terrace. Stonetown Terrace is an elevated site and the significant levels difference means that vehicular access cannot be provided directly from the Flaxmill site. Pedestrian access only will be facilitated between the Flaxmill, Quarry and Stonetown Terrace sites. It is envisaged that this vehicular access will serve circa 40 – 50 units with provision for circa 27 no. car parking spaces only, thereby limiting the vehicular movement on this access route.

The Limerick Development Plan indicates reduced car parking provision for city centre sites, whilst the Design Standards for New Apartments requires increased provision of bike parking. Final provision will be subject to design development, but bike parking will be provided in excess of the minimums set out in the Development Plan, through a mix of short-stay and long-stay facilities covered and secure facilities.

A Sustainable Mobility and Movement Strategy to optimise, accessibility and connectivity is proposed. Prioritising pedestrian and cycling permeability and movement between the site and the city and within the site areas, with consideration for potential new pedestrian bridge. The closest local bus stops to the site are located northeast of the site, along the R45 Ennis Road, accessible by a 6-minute walk. A submission has been made to the National Transport Authority in respect of the proposed BusConnects proposal for Limerick City, seeking provision of a bus stop on the Condell Road to serve the development proposal.

Residential car parking provided in combination of surface and undercroft parking at an average ratio of 0.42 spaces per unit across the site, with office car parking provided in combination of surface and underground parking at 1 space per 240m² across the site (majority on the Shipyard site). Some 20 no. Car Club spaces are proposed within the overall development with a Mobility hub provided on the Shipyard site with access off Condell Road. The Mobility Hub serves the commercial and mixed-use areas on the Cleeves Site.

Less car parking on site will control the level of traffic generated by the proposed development. Potential occupiers of the residential and office units will be familiar with the traffic and mobility approach prior to purchase / occupation. Reduced car parking on site and in the area will therefore be the norm from the outset. As detailed in the public submissions received, a Mobility Plan and Traffic Assessment will need to be further developed as development on the site progresses.

The design of the section of North Circular Road that presently splits the site, will be carefully developed following principles of mode integration and shared surfaces. The North Circular Road to O'Callaghan Strand is to be raised, to become a shared pedestrian / cycle/ priority area with vehicular access.. It is envisaged that the streetscape will include high quality elements associated with surfacing materials, lighting and urban furniture, enhanced with planting / trees as part of traffic calming measures, thereby integrating the street into the development. As part of this work and the raising of the roadway the roundabout at Shelbourne Road / North Circular Road will be upgraded.

Waste collection is likely to be centrally controlled, with storage areas within the development, or externally facilitated, with dedicated waste collection bays provided on the street. It is possible that the bin handling within the site and externally to the laybys will be done by mechanised means. With limited on-site car parking, there is likely to be additional pressure on activities such as deliveries. This refers to shopping deliveries and online shopping, potentially including bulky items. In order for these activities to operate without any significant impact on the internal courtyards and the external public realm, dedicated delivery laybys are provided on the street. This, in tandem with ensuring that internal areas are also accessible to vehicles, will provide the capacity and flexibility to accommodate the potential requirements associated with deliveries.

6.6 Sustainability & Climate Change

- Must be at the heart of development – building materials, alternative energy etc.
- Key focus required on climate change mitigation.
- Impact of scale of development on floodplain
- What protection is there for Fernhill from flooding.
- Noise pollution during construction

The site has the opportunity to become a precedent development addressing the twin global crises of climate emergency and biodiversity loss. The particular characteristics of the site allow exploration of a number of environmental opportunities including a resilient Energy Strategy. As development advances on the site consideration will be given to the long term viability and evolution of energy systems including energy mix, building flexibility (shape and form), adaptability, pollution and other environmental agenda items including mobility, climate and health. Consideration will also be given for potential integration of water in the site energy strategy, benefitting from the unique environmental site conditions and the potential for Tidal Energy, specifically the hydrokinetic turbines, developed by Irish company GKinetic Energy, as part of a +CityxChange project for Limerick city.

Exemplar energy targets , ensuring alignment with the masterplanning principles, will be established as development progresses on site. The Vision document already incorporates a number of recommended environmental measures, which will need to be further evaluated following detailed building design, includingies

- Fabric-first principles to minimise heat loss;
- Solar design to maximise beneficial solar gains, and reduce overheating;
- Green roofs providing extensive on-site biodiversity;
- Sheltered outdoor spaces to enable year-round use;
- Climate beacon chimney shifts colour according to energy status of site;
- Environmental canopies provide protection from rain and wind while generating energy with solar PVs;
- Efficient and low carbon materials prioritised to reduce embodied carbon;
- Zero waste - comprehensive Site Waste Management Plan; and
- Healthy materials, avoiding potentially harmful chemicals.

According to the Planning System and Flood Risk Management Guidelines, most forms of development should be avoided in areas of flood risk where possible. Where development cannot be avoided, proposals for less vulnerable uses should be substituted. The Guidelines do recognise that in some instances such as existing brownfield sites in large urban areas, it may be appropriate to allow development where it can be illustrated that there is a wider strategic justification for such development and that the flood risk can be managed to an acceptable level. However, where a change of use from less vulnerable to highly vulnerable development is proposed in areas of flood risk, a Justification Test will be required. The subject site has already passed the Development Plan Justification Test as detailed in the Limerick Development Plan. Given the location of the site and its designation as a key regeneration site within the current development plan, it is envisaged that the strategic planning aspects of a Development Management Justification Test can be passed. Accordingly, the Masterplan seeks to maximise the ability to manage flood risk to an acceptable level.

While the Flooding Guidelines requires that flood risk should be managed to an appropriate level for the design life of the development, it should be done in a manner that is also compatible with the achievement of wider planning objectives in relation to development of good urban design and vibrant and active streetscapes.

A Flooding Technical Report (Flood Risk Assessment) was prepared for the site containing a variety of flood mitigation measures. These include but are not limited to raising of building floor levels, applying flood resilient and resistant measures, basement tanking and raising of the North Circular Road to provide safe access and egress. The masterplan presented has incorporated some of the recommended measures and satisfies to some degree the flood risk management requirements. There are however outstanding design items that need to be addressed during design development:

There is a requirement to provide safe access and egress above the flood levels from all buildings. The masterplan proposes raising of the NCR up to 5.70m OD, subsequently providing safe access and egress as well as minimising risk of water ingress to basements from entry points. The raising of the road will also benefit Fernhill from a flooding perspective.

The Flood Risk Assessment (FRA) completed for this project refers to current data and guidance at time of writing. Possible changes to this guidance could impact on FRA(s) to be completed as development advances and a planning application advances on the site.

6.7 Biodiversity

- Presence of starlings on site – red listed bird of high conservation concern
- No evidence of environmental survey informing the Masterplan
- More emphasis on retaining and reinforcing biodiversity is required.

The Masterplan seeks to minimise the impact on the existing natural eco-systems and enhance biodiversity on site. The site was the subject of detailed ecological multi-disciplinary ecological surveys and was not found to be of particular ecological sensitivity.

Following extensive bat surveys during the summer and winter seasons, the site was found to support low levels of bat activity. Higher levels of activity recorded on the static detectors were attributed to a small number of bats foraging continuously around the reservoir. There were, however, small accumulations of droppings and feeding remains in several of the buildings, which indicate some irregular use by bats. No bats were observed entering or leaving any roosts during any of the surveys undertaken. Further bat surveys will be required to provide additional information that will allow the design of the building to maximise potential for enhancing the site for bats and biodiversity in general.

Wintering bird surveys carried out revealed the site does not provide significant supporting habitat for wintering bird species or any SCI species of nearby Special Protection Areas. The site is in close proximity to the River Shannon, designated as part of the Lower River Shannon SAC and the River Shannon and River Fergus Estuaries SPA.

An Otter was observed in the River Shannon to the west of St Michaels Rowing Club during the December 2021 survey. No otter holts were recorded within the site. While otters are likely to regularly occur in the proximity of the site and might use the shoreline occasionally, the site is of generally low value for mammals (except bats). No signs of badger or other protected mammals were recorded within the site.

Overall, the project aims to promote urban biodiversity as a central component of the Masterplan. This will be achieved by providing and restoring bat roosting habitat, appropriate landscaping and creating 'Green spaces'. Extensive green areas are being incorporated in and around the reservoir and infiltration gallery. Sustainable Water Management is also proposed through the use of Sustainable Urban Drainage Systems (SuDS) including Rain Gardens, Green Roofs, Rain water harvesting, Re-use and recycling, leveraging site topography, and industrial fabric to incorporate water into public realm as a sustainable amenity.

Consultation was undertaken with the NPWS and their feedback will be incorporated into the future building design process, including the introduction of swift bricks in proposals and the advancement of landscaping proposals to comply with All Ireland Pollinators Plan, which aims to help bees, other pollinating insects and our wider biodiversity.

6.8 Built Heritage

- Need to consult beyond the Protected Structures Register when deciding what structures and buildings to keep / not to keep.
- Need to keep Fernbank House – one of the early original homes on NCR.
- Removing the walls around Cleeves is the wrong thing to do.
- Defining the boundary of the site is a good thing - examples in Berlin.
- Want to keep the existing Cleeves wall without making access to Stonetown Tce.

A response to many of the Built Heritage issues has already been provided in Section 5.2.4 of this report, in response to the submission by An Taisce, including the issue concerning demolition of Fernbank House. It is not proposed to restate the response here.

A Statement of Significance has informed the overall reuse strategy for the site. The strategy does not and has not solely relied on the Register of Protected Structures. The Heritage and Existing Fabric Strategy is detailed in Section 9 of the Illustrative Masterplan. Appendix V contains a detailed Statement of Significance relating to the heritage buildings on site, which have been classified into high, medium, low and negative significance. It is this Statement of Significance which has guided development on the site.

The boundary wall has been identified as part of Phase 1 of the historic development of this site. The wall reflects the curtilage of the land by the roads that pre-dated the advent of the Flaxmill, bridging between a number of buildings that currently and historically skirt the edge of the site. The original wall is built of stone taken from the site quarry, with parts of the wall containing similar historic details to those of the Flaxmill. Later alterations occurred during phases of adaption of the site, with the most obvious being the widening of the entrances post 1960s.

It is interesting to note that historically there was pedestrian access from the Cleaves site directly into Stonetown Terrace. Doorways off Stonetown Terrace indicate the location of routes into the administration block of the site. It served to secure the site, protecting the operation within and allowing the management of employees.

The wall has an important role to play in informing understanding of the phasing and operation of the site. The potential of the various parts of the boundary walls to inform understanding of the wider site means that the walls significance is commensurate with the respective phases. Nonetheless, there is tolerance for the walls to be extensively altered to permit the successful re-development of the site. This approach is supported in the Limerick Development Plan as an objective of the plan is to open the site to the city. However, more detailed analysis of the walls will allow for focused solutions to the respective sections.

In summary, the lesser the significance of the wall, the greater the tolerance for change. Where sections of the wall are proposed for removal to enable the successful re-use of the site, it would be reasonable to seek approval for detailed recording as a means to mitigate the loss of the fabric. In this way, understanding can be improved without loss to the wider significance

6.9 Implementation & Delivery

- Next stage of masterplan should prioritise the design and delivery mechanism for the housing and identify suitable funding.
- No indication of how residential units will be delivered – do not want pension funds etc.
- Need European examples of other exemplar projects – the focus should not solely be from the UK.

The site naturally divides itself into several discrete zones and this makes delivery and phasing attractive from a development perspective. It is likely that development of the Cleaves site will be phased in such a way as to provide for organic growth in the use of the site, without necessitating the release of too much of the site and buildings in any one phase, whilst also allowing for 'meanwhile' uses. Although the masterplan must be developed holistically, the primary sites to each side of North Circular Road could be developed

independently, but yet having regard to the requirements of the overall Masterplan. The upper level Salesians and Stonetown sites could also be developed separately with individual access, with creation of new links into the Quarry area and from Salesians down to the North Circular Road.

Although the unit mix has not yet been defined (this will be defined at planning application stage), there are different ways to live at Cleeves Riverside Quarter, possibly with outright purchase, low cost sale schemes, shared ownership, and opportunities for both social and private renting. The next stage in the Masterplan process is to go to the market to determine investor interest and to define a pathway for the delivery of the Cleeves Masterplan, including housing.

A number of Heritage Re-Use Precedents were considered in the preparation of the Masterplan. The precedents were taken from the portfolio of works undertaken by members of the Design Team. Feilden Clegg Bradley Studios are a UK based architectural team who have been fortunate to work on a Flaxmill Buildings similar to Cleeves in Templeworth and other industrial heritage sites. It is for this reason that the focus is on UK exemplar projects, as these projects were designed and implemented by the design team, providing valuable insights and lessons.

6.10 Requested Premises & Facilities

The following organisations have requested dedicated premises and facilities:

- Ennis Road First Responders
- Shannon Dragons and Shannon Paddlers with specific reference to the reservoir and need for storage facilities and changing rooms.
- Swimming Limerick
- Haven Hub – Suicide Prevention Centre
- Local café operator seeking premises.

Limerick Twenty Thirty has taken note of these requests and acknowledges the need for the provision of community space. Significant mixed use and community space has been accommodated within the development proposal concept. Limerick Twenty Thirty welcomes the continuous engagement of all parties as the development advances.

6.11 Other

- Residents are not listened to.
- Residents of Old Westfields not included in 3d model.
- Limerick Twenty Thirty Board of Directors – no Councillor representation on the Board from the Ward.

As Limerick Twenty Thirty embarks on the realisation of a significant development for the Cleeves site, it regrets that some residents feel that they are not adequately listened to, particularly at such an early stage in the project. The purpose of the Masterplan has not only been to establish a broad development framework for the site, but has also been to:

- Provide stakeholders with the information they need to participate in a meaningful way;
- Assist Limerick Twenty Thirty in understanding their concerns; and

- Provide an opportunity for Limerick Twenty Thirty to explain and rationalise the proposed development concept.

The purpose of this document is to provide a response to the submissions raised in a transparent manner and to explain to those who made submissions why certain approaches have been taken. It is intended to continue to engage with residents and the general public as development progresses.

The 3d model prepared for the public consultation was intended to aid explanation and facilitate discussion. Accordingly, it was not intended to include all existing housing in the surrounding area. It was considered that only existing development directly adjoining the development site was required to set the context and facilitate discussion.

The issue of Councillor Representation on the Board of Directors of Limerick Twenty Thirty is not a matter for consideration in the advancement of development on the Cleeves site.

7.0 CONCLUSION

Limerick Twenty Thirty has actively engaged, consulted and maintained dialogue with the local community and other stakeholders from an early stage in the Masterplan process. The consultation process has been an extremely valuable exercise and has provided a detailed and enhanced understanding of the key issues and concerns of the stakeholder and local community, which have ultimately helped to shape the Masterplan Vision and will continue to influence detailed design on the site.

The objective of the public consultation process was to ensure the widest possible consultation with individuals, communities, and other stakeholders from the commencement of the project, in observance with the best industry practices. Every effort was made to identify those to engage with, in a flexible and facilitative manner, in order to build strong and effective relationships with those that will live in the wider vicinity of the Cleeves site.

Engagement will continue throughout the different stages of the project, from the initial scoping of the Environmental Impact Assessment Report (EIAR) with statutory authorities. As development progresses and a planning application is prepared, further public engagement will be advertised and facilitated therein. During the planning application stage, it is of course open to any member of the public to make a submission. During the planning stage, Limerick Twenty Thirty will remain available to the community in relation to any local issues and requirements that may arise and respond in a timely manner.

Further engagement will be required at construction and operational stages should planning permission be granted.