

ENVIRONMENTAL IMPACT ASSESSMENT REPORT

VOLUME III APPENDICES

Appendix 4-4 Development Proposal Consultation Report



LIMERICK TWENTY THIRTY^{DAC}

Cleeves Riverside Quarter Outline Sketch Scheme

Stakeholder Engagement & Public Consultation

Statement of Outcomes

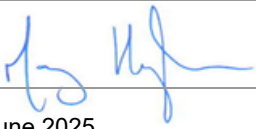
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CHARTERED TOWN PLANNING & ENVIRONMENT CONSULTANTS

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Project:	20035 CRQMP Cleeves	
Prepared by:	Mary Hughes MIPI MSc Town & Regional Planning PG.Dip Environmental Impact Assessment (Mgmt.)	
Signed		
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1.0 INTRODUCTION

1.1 Background

This report summarises the issues arising from the second public consultation event held on the regeneration and redevelopment of the Cleeves site. This report should be read in conjunction with the Statement of Outcomes Report prepared at the Masterplan stage (Stage 1) and which detailed the public engagement and consultation held between February - April 2023.

The current stage (Stage 2) is focused on preparing a robust application for consent, to be submitted to An Coimisiún Pleanála for consideration. This stage involves a phased approach to development, to include detailed design consideration of new buildings, restoration of heritage buildings, design of the public realm, and demolition of some structures and buildings to open the site to the public.

A Stakeholder Engagement & Public Consultation Strategy was prepared for Stage 2 which sought to build on the engagement already undertaken for Stage I. That Strategy has guided the extent and nature of consultation for this stage.

It should be noted that Stage 2 comprises two parts including Stage 2A1 – Outline Sketch Scheme and Stage 2A2 which is the planning application. This report has been prepared following consultation on Stage 2A1 – Outline Sketch Scheme and is intended to inform the final planning application to An Coimisiún Pleanála (Stage 2A2).

1.2 Structure of Engagement and Consultation

Stage 2A1 has been subject to on ongoing consultation and engagement with key stakeholders and statutory bodies as detailed in Section 5.0 of this report.

A public consultation event was held in the Cleeves Flaxmill Building on the evening of the 4th June and afternoon of the 5th June 2025, with some 160 no. attendees across both days. The event was well publicised in local media and across social media channels, with door to door leaflet drops in adjoining residential neighbourhoods. There were also a number of direct briefings on those days with a number of key stakeholders.

1.3 This Report

The purpose of the Statement of Outcomes document is to report on the consultation process and provide an accurate record of feedback received during the Stage 2A1 consultation (Outline Sketch Scheme). 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 and will inform detailed design for the planning application (Stage 2A2).

2.0 STAGE II – DEVELOPMENT PROPOSAL

Stage 2A1 comprises an Outline Sketch Scheme developed from the key principles set out in the Masterplan stage and provides an outline of the design development for the proposed development including site plans, sections, elevation and schedules of accommodation. The Outline Sketch Scheme is accompanied by a Design Report and Outline Cost Plan.

There have been some key changes since the Masterplanning stage, in particular the national need and demand for housing, associated with the need, in particular, for housing in Limerick city centre. Further, significant investment has been fast tracked for the Flaxmill building facilitating its stabilisation and restoration, with work due to commence on site in the next two months.

A phased approach to delivery of the Masterplan was always envisaged from project inception and Stage 2A1 focuses on that part of the Masterplan being advanced for planning consent. To that extent, the adaptive reuse of the Flaxmill Building, the full development of Shipyard, NCR and Infiltration gallery as set out in the Cleeves Masterplan Vision will now form part of a future phase.

At Stage 2A1 the following scope of development was proposed and which was placed on public display:

- Salesians Zone – 1 no. building with 2 no. blocks extending to 6 and 7 storeys comprising 146 no. apartments (74 no. 1 bed; and 70 no. 2 bed); a creche of 400sqm; undercroft car and bicycle parking; 20 no. 3 storey 3 bed townhouses; and 30 no. car parking spaces for the dedicated use of the adjoining Salesians Primary School.
- Quarry Zone – 1 no. Purpose Built Student Accommodation building with 3 no. blocks extending to 6 and 7 storeys comprising 271 no. bedspaces with ancillary uses at ground floor level.
- Stonetown Terrace Zone – 1 no. building extending to 5 storeys comprising 36 no. apartments (4 no. Studios, 10 no. 1 beds; 21 no. 2 beds; and 1 no. 3 bed) with storage and bicycle parking at ground floor level; and 9 no. 3 storey 3 bed townhouses
- O’Callaghan Strand Zone – 1 no. building extending to 4 / 5 storeys comprising 21 no. apartments (9 no. 1 bed and 12 no. 2 bed) and 250qmq of commercial ground floorspace;
- Dedicated mobility hub with canopy including double stacker bicycle parking; and EV Charging spaces within the Shipyard Zone.
- Extensive provision (0.78 hectares) of Public Realm including areas of civic and green spaces, incorporating a riverside canopy functioning as an outdoor event space.

The proposed development will be refined for the purpose of planning application preparation (Stage 2A2), with the ability to take into consideration third party perspectives in some instances. However, it should be noted that substantial change will not occur.



01. Illustrative View from Salesians



02. Illustrative View from the riverfront

Figure 1.0 Images from Display Boards

An integrated mixed-use Masterplan focused around a transformational Public Realm that supports the future of working, living and learning.

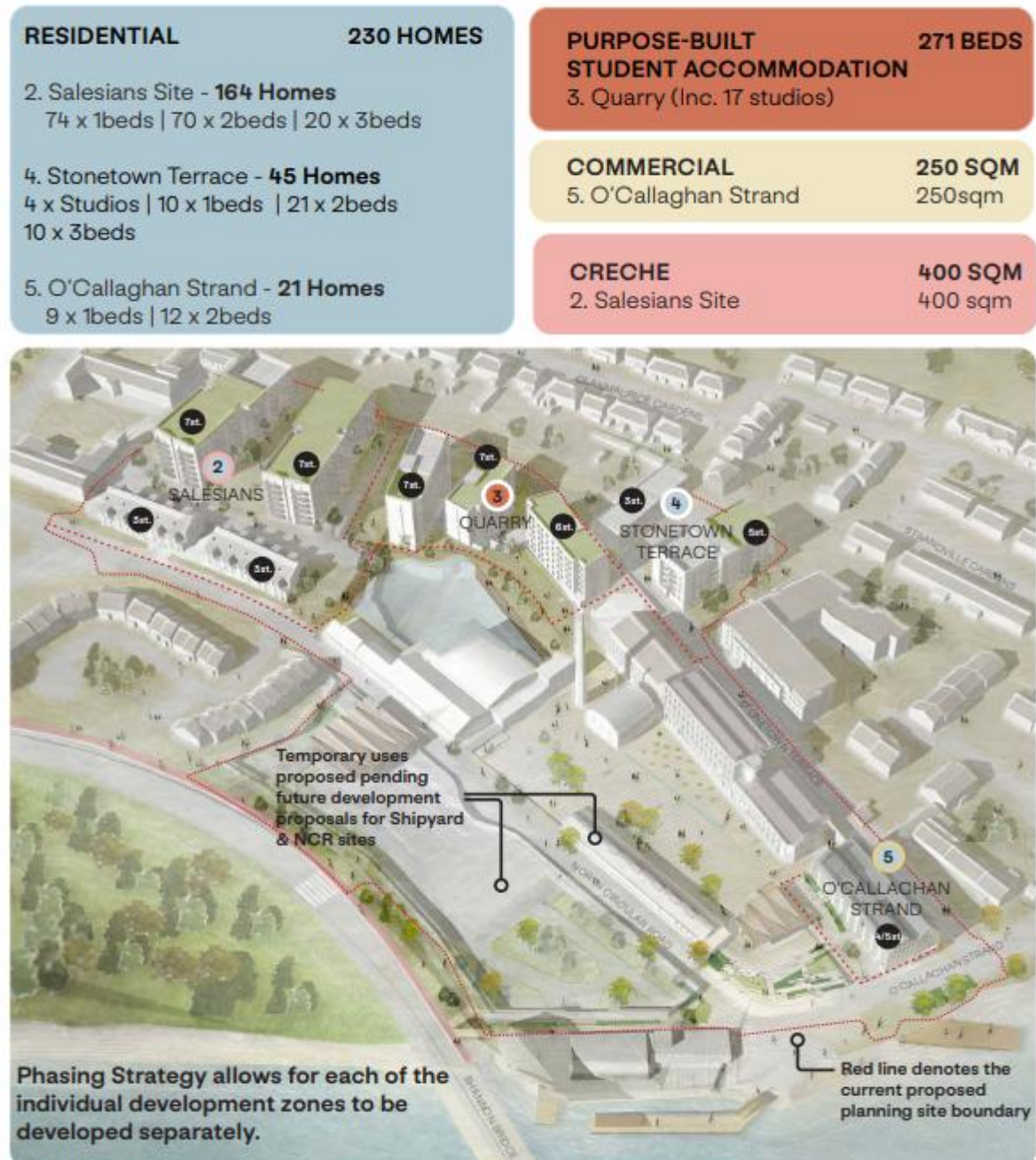


Figure 2.0 Public Consultation Notice Board Sample

3.0 ENGAGEMENT & CONSULTATION

3.1 Limerick City & County Council Internal Departments

A number of workshops were undertaken with in-house Departments within Limerick City & County Council including, Planning Department, Housing Department, Environment Section, Active Travel, Water Services re Flooding, Traffic & Transportation, Placemaking Team and Climate Action Department.

Subsequently, presentations were made to Senior Management and Elected Representatives.

3.2 Statutory Consultees

In addition to Scoping Requests issued to statutory bodies in the preparation of the Environmental Impact Assessment Report (EIAR), a number of structured meetings were undertaken as detailed in Table 1.0.

Targeted Group	Meeting Date	Meeting Outcome (<i>see response to issues in Section 5.0 of this report</i>)
Built Heritage Section, Department of Housing Local Government & Heritage	1 st Meeting - 03 rd June 2025 2 nd Meeting - 10 th July 2025	Initial meeting requested there be no demolition without reuse, heritage to be central, justify removal of boundary wall, need proposals for Flaxmill Second meeting provided for a better understanding of the phased approach to development on the Masterplan site. It was clearly understood from this meeting Understand that the securing of the surviving historic fabric will form part of the initial building programme and enable the recovery of the key buildings overtime with a diversity of uses. O'Callaghan Strand building to be regraded to be in keeping with the scale, form and materiality of industrial complex. Materials from Fernbank House to be reused in-situ rather than salvaged. Consider re-use/adaptation of Fernbank rather than demolition. Reconsider removal of Victorian Houses, Fernbank House and Infiltration Gallery.
National Parks & Wildlife Service	04 th April 2025	Public Lighting strategy important, Compatibility between ecology & proposed designs; Riparian corridor and connectivity strip required; Swift considerations into buildings over 2 storeys; bat slates on Flaxmill; native planting; connectivity to Westfirelds for bats
Southern Regional Assembly	09 th December 2024	Supportive in principle of site redevelopment. Acknowledged urgent need for housing and the need to fast track housing for Stage I.
Office of Public Works	30 th May 2025	Discussed Limerick City Flood Relief Scheme with appointed Engineer Designers. Confirmed scheme was an Optioneering Stage and flood levels are similar to what was previously discussed.

Table 1.0 Targeted Stakeholder Briefings & Workshops

3.3 *Neighbours & Occupants*

Individual presentations and consultation was undertaken with the following groups over the 4 – 5th June 2025, including St. Michael's Rowing Club; Salesians Primary School; current tenants within Cleaves, and neighbouring residents at Stonetown Terrace, Fernhill, Clanmaurice Avenue; and Landsdowne Hall

3.4 *Written Submissions*

A total of 32 no. written submissions were received from members of the public. A majority of submissions were from neighbouring and adjoining residents. Whilst a number of submissions were supportive of the proposal and requested increased height and density, the majority of submissions raised issues of density, massing, scale, along with lack of facilities and opportunities for active recreation.

4.0 ISSUES RAISED

The stakeholder engagement and public consultation process raised a number of similar issues in respect of the Outline Sketch Scheme. 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 & Amenity	– The plan includes a good mix of intensified development, heritage protection and nature based solutions – No Daylight & Sunlight Assessment – No distance provided between the building blocks and neighbouring development including houses on Clanmaurice Ave and Salesians School – Will there be balconies on the 5 storey Stonetown Terrace block – Failure to provide sections and cross sections.
Tenure Mix & Unit Type	– A mix of public and private housing is required to facilitate tenure diversity. – Number of one bed units is welcomed – Need housing to accommodate elderly and facilitate downsizing – Number of student accommodation is too high – Reduce number of apartments and increase housing
Design	– Apartments in Salesians are out of date and will age badly.
Recreational Uses	– Need for inclusion of sports facilities – Need a lot more greenery – No allotments or sports/community facilities – No creche, medical centre, swimming pool or playgrounds – No facilities for the local community – Need separate facilities for students and for adults – public realm cannot serve both.
Density Height & Massing	– Lacks ambition. Density and height should be a lot greater. – Should be 3 – 4 storey blocks rather than 6 - 7

	– Need more spaced out development with more greenery – Effect of height on neighbouring residents – No regard to planning conditions imposed on the original Stonetown Terrace development – Lack of compatibility with established context – Impact on wind & downdraught is required. – All buildings within 30m of Clanmaurice Ave should be a maximum of 3 storeys in height
Traffic, Mobility & Pedestrian Connectivity	– Severe lack of car parking – Request to make 4 no. existing parking spaces on Stonetown Tce designated parking spaces for existing residents. – Significant existing traffic congestion – Inadequate car parking. – A full Traffic Impact Assessment is required. – Full engagement with the National Transport Authority is necessary – Construction traffic, bin access and servicing not considered
Environmental Impact	– An Environmental Impact Assessment is required
Biodiversity	– Need a greater emphasis on ecological restoration – Proposal for the rivers edge is too harsh – Quarry area needs to maintain its biodiversity
Built Heritage	– The flaxmill should be turned into a museum highlighting the many industries in Limerick throughout the years. – The chimney could accommodate a laser display from the top. – Fernbank House should be retained and should be a focal point for the development. – Fernbank House would make a great Community Centre
Requested Premises & Facilities	- Ennis Road Community First Responders seeking to operate from the development - Some commercial units proposed should be identified for crafts and artists to open similar to the Buttermarket in Enniskillen and Kilkenny Design Centre
Other	– Inadequate water & sewerage infrastructure to accommodate the development – Part of the site should be set aside for a Food Market similar to Marina Market in Cork. – What is the plan in terms of maintenance of the development – What is the plan for when students are not in residence

Table 2.0 Consultation Written Submissions

5.0 RESPONSE TO STATUTORY CONSULTEES

The issues raised by the statutory consultees can be broken into Built Heritage, Ecology & Biodiversity and Flooding. It is proposed to address each of these issues in turn and demonstrate how they have been addressed within the development proposal.

5.1 Built Heritage

Issue Raised:

The Built Heritage Section of the Department of Housing Local Government & Heritage highlighted in their first meeting that no demolition should occur without reuse and that heritage must be central to the proposal, including identified uses for the Flaxmill building. In addition, justification is required for removal of the boundary wall. In their second meeting there was a more detailed understanding of the proposed development for Cleeves and the different phases of construction. There was an understanding that the securing of the surviving historic fabric will form part of the initial building programme and enable the recovery of the key buildings overtime with a diversity of uses. A number of issues however, remain to be addressed.

Response:

Due to a number of factors, it is necessary to bring the Masterplan proposal forward in phases.

Whilst the Flaxmill building has always been central to the regeneration and redevelopment of the site, identifying appropriate uses for the building has always been a challenge. The signing of a Memorandum of Understanding with the Technological University of Shannon (TUS) for the use of the Flaxmill Building as part of a wider Educational Campus on the site, has provided the building with a practical and viable use going forward. However, the development of an educational campus on Cleeves is at early design stage and needs to advance through a number of key stages prior to development into a planning application. In contrast the proposed development is well advanced. In light of the critical need for housing in the country and in Limerick city, as submitted by a number of stakeholders during the Masterplan consultation period, it was decided to advance the residential and public realm elements of the overall Masterplan. Because a future, viable use has been identified for the building, which is currently being advanced, it was considered there was no purpose in including the Flaxmill in the current application for consent.

However, the Flaxmill building has not been ignored as a contractor is about to be appointed to undertake stabilisation and repair works to the upper section of the Mill and its roof. This work, with funding to the tune of €5 million, will contribute to the future viable use of the building.

A comprehensive statement has been prepared which assesses all buildings and structures on site. This 'Statement of Significance' has been used to guide and inform the treatment of all structures on site. Whilst demolition is proposed to some structures on site, it is not proposed to demolish any protected structures. The proposed demolition includes either c20th additions or elements that are absolutely necessary to facilitate the development. This Statement of Significance has been amended to more comprehensively address the history of Salesians as it evolved throughout the years and the Infiltration Gallery is no longer included in the development proposal.

There are two Victorian houses fronting onto North Circular Road which are to be demolished to facilitate development of the overall scheme. Removal of these buildings is necessary to facilitate universal pedestrian and cycle access from the proposed PBSA to North Circular Road. Further, removal of the houses is necessary to facilitate a construction access to the Quarry site, as the only other alternative is a narrow

access between the chimney (protected structure) and the Infiltration Gallery, which could potentially impact the chimney in the event of an accident. The houses shall be preserved by record.

Similarly, it is proposed to demolish Fernbank House which has been substantially modified over time. Material from Fernbank House will be recorded and reused on site where possible. Interestingly, a recent request was made by the public to list Fernbank House on the Record of Protected Structures. The report from the Conservation Officer within Limerick City & County Council recommended against its protection on the basis that whilst the *“site is of some social interest and that some surviving architectural and decorative features and fittings are of some architectural and artistic interest, the interest is limited and is not considered sufficient to warrant inclusion on the Record of Protected Structures, particularly given that the site has been extensively altered and developed throughout the 20th century with the result being a disharmonious complex of low architectural quality”*.

The boundary wall has been identified as part of Phase 1 of the historic development of this 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.

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.

5.2 Biodiversity

Issue Raised:

The NPWS highlighted the importance of the public lighting strategy for the site, with respect to biodiversity and in particular bats. Compatibility is required between biodiversity and the proposed designs, in particular riparian corridor and connectivity strips between the site and the river and the site and Westfields. Enhancement measures for Swifts should be considered in any building over two storeys.

Response:

The site has been subject to extensive surveying and analysis by the MKO Ecology team. This analysis has informed design with an emphasis on habitat retention and enhancement insofar as possible and has informed Chapter 7.0 Biodiversity in the EIAR.

Due to the scale of the project, it is not possible to retain the majority of habitats within the site throughout construction. It is notable that the project has aimed at retaining the most suitable area on site for biodiversity, the reservoir. The reservoir is therefore the focus of biodiversity mitigations and enhancements

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.

Existing connecting features include the quarry walls and above private gardens towards Shelbourne Rd Lower, as well as the terrace house gardens towards Fernhill. It is proposed to maintain connectivity

features along the quarry walls to the south, and along the northern boundary of the site. Landscaping and lighting will ensure a dark corridor is available in this area, to provide a link to the reservoir on site. All these features will be maintained and enhanced. No vegetated connectivity currently exists directly towards the river and it is not proposed to provide same.

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'. Three no dedicated bat houses are to be erected on site and extensive green areas are being incorporated in and around the reservoir and infiltration gallery.

5.3 Flooding

Issue Raised:

Query from the Council's Flood Relief Scheme on the frequency of the erection of the temporary flood barrier at junction of O'Callaghan and North Circular Road, and how this aligns with flood events. The team working on the City Flood Relief Scheme noted that an objective for the Scheme is to minimise demountable solutions where possible.

Response:

The lowest levels of the existing road / pathway surface at the junction of O'Callaghan Strand and Stonetown Terrace are approximately 4.0mOD, almost exactly at the 1 in 2-year tidal flood level on the River Shannon and likely to cause very shallow flooding of the existing roadway / pathway. ARUP confirms that there may be a need to close / erect the gate / barriers, on average, 3 to 5 times every two years, assuming current road / pathway levels remain unchanged.

6.0 THEMATIC ISSUES

6.1 Residential Use & Amenity

- The plan includes a good mix of intensified development, heritage protection and nature based solutions
- No Daylight & Sunlight Assessment
- No distance provided between the building blocks and neighbouring development including houses on Clanmaurice Ave and Salesians School
- Will there be balconies on the 5 storey Stonetown Terrace block
- Failure to provide sections and cross sections.

Limerick Twenty Thirty (LTT) acknowledge the support offered for the development proposal and has worked hard to achieve an appropriate balance in residential delivery, provision of new public realm and heritage protection.

Stage 2A1 Outline Sketch Scheme was informed by the preliminary results arising from the Daylight & Sunlight Assessment being prepared by Integrated Environmental Solutions (IES). The application for consent (Stage 2A2) will be accompanied by a detailed Daylight & Sunlight Assessment, which shall comprise Chapter 17 of the Environmental Impact Assessment Report (EIAR).

Stage 2A1 only comprised an Outline Sketch Scheme and so did not include the level of detail expected in support of a planning application (Stage 2A2). The Site Layout Plan to be submitted with the application

for consent shall contain relevant dimensions, including distances between buildings blocks and between existing adjoining buildings. Similarly, a full suite of sections and cross sections shall be provided.

The proposed five storey apartment block at Stonetown Terrace has balconies on the western, southern and eastern elevations. There are no balconies proposed on the northern elevation facing Clanmaurice Gardens.

6.2 Tenure Mix & Unit Type

- A mix of public and private housing is required to facilitate tenure diversity.
- Number of one bed units is welcomed
- Need housing to accommodate elderly and facilitate downsizing
- Number of student accommodation is too high
- Reduce number of apartments and increase housing

The development proposed is 'tenure blind' thereby affording maximum flexibility at implementation and delivery stage. Housing needs and demands are continuously changing and are in a state of flux, dependent on market circumstances at a point in time. From a housing perspective the site needs to be able to react to the greatest needs at the time of delivery, such that an acceptable balance of social, affordable and private housing can be accommodated on the site at that time.

The number of one bed units has been finely balanced and comprises 42.6% of the overall residential units (excluding the student accommodation). The existing ratio of 1 and 2 bed units in the Castle C Electoral Division (ED) surrounding the site and the wider Limerick City & Suburbs area, suggest an over dominance of 3+ bed housing units. Whilst the proposed development does accommodate some 3 bed units in order to accommodate housing mix and tenure diversity within the development, the focus is on one and two bed units which is undersupplied in the area, based on the Housing Need Demand Assessment (HNDA) projections as detailed in the Limerick Development Plan 2022 - 2028.

In addition to 42.6% of one beds, there are 44.3% two bed units proposed within the development. These two beds are generally in excess of minimum apartment sizes required under the Guidelines for Planning Authorities - Design Standards for New Apartments 2023 and would be suitable for 'downsizing'. Further, the servicing area within the apartment blocks (access corridors) have been sized to Universal Design Standards (UD), thereby providing flexibility to accommodate UD apartments as the need arises.

The Purpose Built Student Accommodation (PBSA) has been designed to facilitate tenure diversity and to address a further sector requiring housing in Limerick city. Whilst not dependent on the proposed TUS Educational Campus which will form Phase III of the proposed development of Cleeves, the provision of student accommodation adjoining an educational campus will facilitate synergistic uses. Further, the provision of PBSA will free up existing private housing currently rented to students, to other rental needs.

The need for greater housing provision in Limerick City is recognised by Limerick Twenty Thirty. 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.

6.3 Design

- Apartments in Salesians are out of date and will age badly.

The Stage 2A1 Outline Sketch Scheme did not contain detailed design including elevational treatment. Whilst the elevational grids were presented at the public consultation event, the architectural quality that can be achieved as well as the simple detailing in brick, material and mortar colour, was not presented.

The proposed elevations of the buildings have been inspired by the rigor and simplicity of the Flaxmill, a regular elevation, with repeatable components and simple brick detailing to deliver a series of high quality, efficient and robust buildings. Materiality details along with a series of CGI's will be included in the application for consent.

6.4 Recreational Uses

- Need for inclusion of sports facilities
- Need a lot more greenery
- No allotments or sports/community facilities
- No creche, medical centre, swimming pool or playgrounds
- No facilities for the local community
- Need separate facilities for students and for adults – public realm cannot serve both.

A Landscape Strategy including a review of Limerick's civic spaces and public parks was undertaken to inform the Masterplan 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 reservoir area is currently being explored so that it can accommodate recreational use in harmony with its biodiversity function. A public park, including a play space with a special character relating to the cultural and natural heritage of the site is provided around the reservoir.

Whilst the aim of the Public Realm Strategy 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 space will also offer a flexible space for events with a riverside canopy. 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 shelter from the South-West winds.

The landscaping and public realm strategy primarily offers a series of passive, interconnected green spaces throughout the development, with areas of playspace identified within each zone. Whilst there are no dedicated areas of sports facilities within the development, the riverside canopy area does provide an opportunity for informal play space or covered outdoor training sessions.

The proposed development does provide for a sizeable creche facility of 373sqm at ground floor level in the apartment building on the Salesians site, catering for 34 no. children. Further there is circa 250sqm of commercial floorspace proposed at ground floor level of the apartment building on O'Callaghan Strand.

Further, there is enormous potential to accommodate additional community facilities and services on the ground floor of the Flaxmill building as part of the Phase III TUS Educational Campus application. The active use of the Flaxmill ground floor was clearly identified in the Masterplan. Presently the site offers accommodation on a license basis to a number of community groups in the area. It is anticipated that such uses can continue in buildings to be retained on site, pending the delivery of Phase III development.

The public realm, open space and connectivity links are intended for the integrated and shared use of all residents on the Cleeves site, including student and adults and including the general public from surrounding areas.

6.5 Density Height & Massing

- Lacks ambition. Density and height should be a lot greater.
- Should be 3 – 4 storey blocks rather than 6 - 7
- Need more spaced out development with more greenery
- Effect of height on neighbouring residents
- Lack of compatibility with established context
- Impact on wind & draught is required.
- All buildings within 30m of Clanmaurice Ave should be a maximum of 3 storeys in height

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 115 units per hectare. This density is reduced from that originally proposed at Masterplan stage and which comprised 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 6 - 7 storeys aligned along a North/South axis to minimise overlooking and overshadowing, whilst allowing light through to the rear gardens of Clanmaurice Avenue. Note that these buildings were reduced in scale and height following the Masterplanning Public Consultation.
- Within the quarry site in front of the reservoir there are three blocks extending to 6 – 7 storeys. 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 along the western boundary respecting existing housing in Clanmaurice Avenue. A 5 storey residential block is aligned along a North/South axis to the rear of Landsdowne Hall.

A Wind Microclimate Assessment has informed the overall design of the scheme and a detailed assessment will comprise Chapter 16.0 of the EIAR.

6.6 Traffic, Mobility & Pedestrian Connectivity

- Severe lack of car parking
- Request to make 4 no. existing parking spaces on Stonetown Tce designated parking spaces for existing residents.
- Significant existing traffic congestion
- Inadequate car parking.
- A full Traffic Impact Assessment is required.
- Full engagement with the National Transport Authority is necessary
- Construction traffic, bin access and servicing not considered

A full Traffic Impact Assessment accompanies the development proposal and traffic is fully assessed in Chapter 18.0 of the EIAR. The National Transport Authority (NTA) were consulted as part of the preparation of the EIAR and their recommendations were incorporated into Chapter 18.0.

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 site has been designed for pedestrian and cyclist priority. North Circular Road and Stonetown Terrace are being redesigned to be shared streets, where pedestrians, cyclists, and private vehicles share the street space. Traffic volumes and speeds will be low and sufficient refuge space will be provided for pedestrian use. Part of the strategy includes limiting car parking provision to discourage car travel amongst residents and visitors.

Car parking is provided at a level of 1 space for every 3 units, with the proposed development providing 77 no. spaces overall. Reduced car parking on site is intended to reduce traffic congestion in the area. The car parking provision considers the city centre location, promotion of active modes of travel and market expectations, while mitigating potential parking impacts on surrounding streets. The Shipyard plot provides

for a residential car club on the existing surface car park. This will provide alternative access to a car for residents who may not own a car. Further, significant quantum of cycle parking (over 500 spaces) is being provided in line with policy requirements for all buildings, including long-term for residents and short-term for visitors.

All public realm proposals have been tested to accommodate the circulation of all the necessary vehicles, including large vehicles associated with emergency and/or servicing.

Waste collection shall be centrally controlled, with storage areas at ground floor level within the apartment buildings. 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 public roads, dedicated delivery laybys are provided on the street.

A detailed Construction Environmental Management Plan (CEMP) will accompany the development proposal and contain construction sequencing with proposals for construction access.

With respect to the 4 no. existing public parking spaces on Stonetown Terrace, LTT has no power of authority to designate the parking spaces. This responsibility rests with Limerick City & County Council and would be subject to the passing of a Bye-Law.

6.7 Environmental Impact Assessment

- An Environmental Impact Assessment is required

An Environmental Impact Assessment is currently being prepared and will be submitted with the application for consent.

6.8 Biodiversity

- Need a greater emphasis on ecological restoration
- Proposal for the rivers edge is too harsh
- Quarry area needs to maintain its biodiversity

See Section 5.2 of this report which details a response to biodiversity issues already raised by the NPWS.

6.9 Built Heritage

- The flaxmill should be turned into a museum highlighting the many industries in Limerick throughout the years.
- The chimney could accommodate a laser display from the top.
- Fernbank House should be retained and should be a focal point for the development.
- Fernbank House would make a great Community Centre

See Section 5.1 of this report which details a response to Built Heritage issues already raised by the Built Heritage Unit of the Department of Housing Local Government & Heritage.

As detailed previously in this report, the Flaxmill is intended to be used for educational purposes.

As detailed previously in this report, Fernbank House is proposed for demolition. As detailed in a report from the Conservation Officer within Limerick City & County Council, which recommended against its inclusion on the record of protected structures, *“whilst the site is of some social interest and that some surviving architectural and decorative features and fittings are of some architectural and artistic interest, the interest is limited and is not considered sufficient to warrant inclusion on the Record of Protected Structures, particularly given that the site has been extensively altered and developed throughout the 20th century with the result being a disharmonious complex of low architectural quality”*.

To facilitate the comprehensive redevelopment of the Salesians site, Fernbank House must be demolished, as its retention would result in inefficient and unviable development on a key city centre site, contrary to the principles of compact growth and urban development. Appendix 7.0 of the Building Recording Report for Fernbank House details the materials that can be salvaged for reuse, whilst the Architectural Design Statement details the reuse of some material on site in Section 5.5.

6.10 Requested Premises & Facilities

- Ennis Road Community First Responders seeking to operate from the development
- Some commercial units proposed should be identified for crafts and artists to open similar to the Buttermarket in Enniskillen and Kilkenny Design Centre
- Part of the site should be set aside for a Food Market similar to Marina Market in Cork.

The Ennis Road Community First Responders currently occupy part of the Cleeves complex, subject to a license agreement. It is envisaged that this use can continue pending redevelopment of the site. As the proposed development progresses to delivery, there are other potential buildings which are to be retained on site and which could be occupied pending delivery of Phase III.

There is circa 250sqm of commercial floorspace proposed at ground floor level of the apartment building on O’Callaghan Strand. Further, there is enormous potential to accommodate additional community and commercial uses on the ground floor of the Flaxmill building as part of the Phase III TUS Educational Campus application, subject to securing viable operators. The active use of the Flaxmill ground floor was clearly identified in the Masterplan.

There is enormous potential on the site to accommodate Food Markets, Craft Fairs and other events within the Flaxmill Plaza, under the protected Riverside Canopy area. Further, pending redevelopment proposals on the Shipyard site, there is potential to accommodate temporary, meanwhile uses including fairs and markets.

6.11 Other

- Inadequate water & sewerage infrastructure to accommodate the development
- What is the plan in terms of maintenance of the development
- What is the plan for when students are not in residence

Contrary to the submission of third parties there is adequate water and sewage capacity to accommodate the development as confirmed in the Confirmation of Feasibility secured from Uisce Eireann.

It is intended that the proposed development will be managed by a Maintenance Company, thereby ensuring a high standard of maintenance across public spaces. The PBSA will be managed by a professional student management company as detailed in the Operational Student Management Plan to be submitted with the application for consent.

When students are not in residence it is proposed that the PBSA be used for short term letting purposes thereby maintaining vibrancy within the Cleaves site outside of term time.

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. LTT has sought to balance the requirements of the public, with the mandatory requirements of planning and public policy, necessitating greater density, apartment typologies and taller buildings.

As the development progresses and a planning application is being 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, LTT 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.