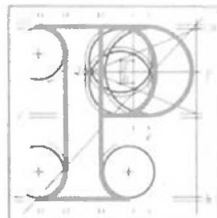


Our Case Number: ACP-323849-25



An
Coimisiún
Pleanála

David and Grainne Sheehan
Rockville
Clanmaurice Avenue
North Circular Road
Limerick
V94 X6RY

Date: 09 December 2025

Re: The proposed development is for a mixed use development that seeks the regeneration and adaptive reuse of a strategic brownfield site, as part of the Limerick City and County Council 'World Class Waterfront revitalisation and transformation project' 'Cleeves Riverside Quarter' in the townland of Farranshane More in Limerick City.

Dear Sir / Madam,

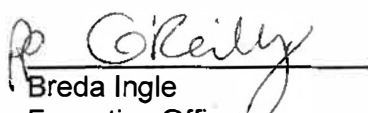
An Coimisiún Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

Please note that the proposed development shall not be carried out unless the Commission has approved it or approved it with conditions.

If you have any queries in relation to the matter please do not hesitate to contact the undersigned officer of the Commission at laps@pleanala.ie

Please quote the above mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,


Breda Ingle
Executive Officer
Direct Line: 01-8737291

JA02

Tel	Tel	(01) 858 8100
Glao Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	communications@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Formal Objection

Date: December 2nd 2025

Proposed Development: Cleeves Riverside Quarter / Cleeves Riverside Campus

Applicant: Limerick Twenty Thirty DAC

Site Location: Former Cleeves Factory Site, North Circular Road, Limerick

Planning Ref: *[to be inserted]*

Objectors

Names: David and Grainne Sheehan

Address: Rockville, Clanmaurice Avenue, North Circular Road, Limerick, V94 X6RY

Occupancy: Owners and full-time residents

Email: dpmsheehan@yahoo.ie

Professional Background:

- David is a practising and self employed Accountant.
- Grainne is an Office Manager with US multination and previous Cabin Crew Manager.

1. Introduction and Status of This Submission

We, the undersigned residents and owners of a dwelling at the above address, submit this updated objection under the Planning and Development Act 2000 (as amended) and associated Regulations.

Our home directly adjoins the proposed development site and will be materially and permanently impacted by its scale, layout, construction phase and long-term operation.

We previously lodged an objection/observation in respect of earlier “Vision” and masterplan material published by Limerick Twenty Thirty DAC for the Cleeves site. This present submission is:

1. **An updated objection** in light of the applicant’s October 2025 public statements and material, including:
 - the public announcement on 21 October 2025 of the Cleeves Riverside Quarter plans;
 - updates to the “Cleeves Riverside Campus / Riverside Quarter” project pages on limerick2030.ie; and
 - the applicant’s stated intention to lodge, and subsequent lodging of, a planning application for Phase Two (residential, student accommodation and public realm) in late October 2025.
2. **A supplement to our original objection.** Submitted previously

2. Updated Context: October 2025 Announcements

From the applicant's own material (October 2025):

- The Cleeves project is described as a €400m+ “landmark” regeneration scheme and “the largest inner-city project ever undertaken in Limerick”.
- Phase Two comprises approximately:
 - 234 residential units
 - 270 student-bedrooms
 - c. 299 m² of commercial space
 - crèche facilities
 - c. 2 acres of public realm (including “Reservoir/Quarry Park”, “Flaxmill Square” and the “Riverside Corridor”)
- The applicant emphasises appointment of a contractor for heritage works at the Flaxmill (Phase One) and outlines an indicative multi-year programme subject to funding and market demand.
- The site is promoted as a mixed-use city-centre regeneration area with significant employment, educational and cultural potential.

We welcome, in principle, well-designed regeneration of the Cleeves site. However, the scale, massing and configuration of the current proposal – particularly the Phase Two residential and student blocks raise profound concerns that have not been addressed adequately in the material released to date.

3. Overdevelopment and Excessive Massing – Failure to Respect Residential Context

The interface with Clanmaurice Avenue is residential. The combination of 234 units, 270 student-beds, and 5–7 storey blocks constitutes over-intensification. If multiple storey blocks of this size or bigger are a requirement then they should be done on the far side of the road on the St Michael's rowing club, old Golden Vale distribution building stand, which will have little or no impact with residential living in the area and could even go higher than original plans.

A. Relief Sought – Height and Massing

All buildings within 30m of Clanmaurice Avenue should:

- be **capped at 3 storeys**, and
- have higher elements **significantly stepped back**.

B. Traffic, Construction and Access – Local Infrastructure and Safety at Risk

Phase Two will generate major construction and operational traffic. The NCR and adjoining roads are already constrained, especially during school peaks.

The material lacks detail on:

- Construction traffic routing
- HGV restrictions
- Bin truck access
- Student drop-off/pick-up
- Pedestrian/cyclist safety

ABP has refused schemes on such grounds:

- *ABP-306931-20 (Cabra)*

Relief Sought – Traffic & Construction

1. Full TTIA (operational + construction phases)
2. CTMP lodged **before** decision
3. Prohibition on construction/operational access via Clanmaurice Avenue (except emergency access)

C. Prematurity, Phasing and Deliverability – Risk of Piecemeal or Incomplete Development

No binding:

- construction contract
- full funding
- operator for student units
- enforceable phasing/delivery plan

As per:

- *Killross Properties v ESB* [2016] IEHC 9
- *Morrissey v ABP* [2022] IEHC 242

planning must be based on realistic implementation.

Relief Sought – Prematurity

Under s.34(4)(b):

- Identify partner/operator
- Demonstrate funding
- Provide enforceable phasing programme

D. Failure to Preserve Fernbank House – Loss of Architectural and Social Heritage

Fernbank House is a mid-19th century NCR villa, historically linked to the Cleeve family and Salesian Sisters (1924–present), with intact original features.

The applicant acknowledges its importance but provides no conservation plan.

Contrary to:

- **Objectives BHA O1, O4, O6**
- Architectural Heritage Protection Guidelines (2011)
- *Balz v ABP* [2019] IESC 90

Relief Sought – Fernbank House

1. Full Conservation Report
2. No demolition/alteration without evidence-based justification
3. Retention and adaptive reuse
4. Refusal if no credible conservation plan

E. Traffic, Road Safety and Network Capacity – Unassessed and High-Risk

1. **Traffic Flow and Congestion:**
Data excludes JFK Primary School; ignores crèche, church, two hospitals; and overlooks daily NCR gridlock.
2. **Safety Concerns:**
No mitigation for pedestrians/cyclists in school zone.
ABP refusals: *ABP-302848-18 (Dundrum)*, *ABP-306931-20 (Cabra)*.
3. **Access and Emergency Vehicles:**
Long-standing access blockages on Clanmaurice Avenue; no credible mitigation plan.
4. **Insufficient Consultation:**
Community afforded no meaningful engagement; strategy speculative and reliant on undelivered 2040 mobility assumptions (*Killross, Morrissey*).
5. **Personal Experience (nearly 10 years):**
Chronic blockages, buses unable to turn, waste trucks/ambulances unable to enter, overspill parking, unmanaged congestion.

Relief Sought – Traffic & Access

1. Full TTIA with peak modelling
2. Stage 1/2 Road Safety Audit
3. CTMP pre-decision
4. Ban on access via Clanmaurice Avenue
5. Mitigation for schools, pedestrians, vulnerable users
6. Revised evidence-based strategy

4. Conclusion and Relief Sought

We respectfully submit the proposal should be refused because:

1. It is premature and inadequately evidenced for a €400m+ scheme.
2. It would materially injure residential amenity (height, massing, overshadowing, overlooking).

3. It lacks essential assessments (daylight, privacy, traffic, flood, EIAR/NIS).
4. It fails to provide heritage-led regeneration or respect the existing residential interface.
5. It is perceived as a new strategy in relation to life style, travel and traffic management which has proven not to work in this country and zero facilities are being provided prior to development.

Specific Relief Requested

1. Formal finding of prematurity under s.34(4)(b).
2. Full refusal as materially contravening the Development Plan.

Alternatively (if granted):

1. Height cap of 3 storeys within 30m of Clanmaurice Avenue.
2. Mandatory daylight, privacy and traffic assessments.
3. Prohibition on construction/operational access via Clanmaurice Avenue.
4. Full public EIAR/NIS exhibition.
5. Proof of partner, funding and enforceable phasing.

5. Summary

We support regeneration of the Cleeves site, but the current proposal is over-intensive, insufficiently justified, and incompatible with the scale and character of the Clanmaurice Avenue neighbourhood and surrounding area.

A balanced approach requires:

- Sensitive heritage reuse,
- High-quality public realm,
- Moderately-scaled residential development.

The current application fails to meet these standards and should be refused or substantially redesigned.

Yours faithfully,
David and Grainne Sheehan

Date: December 2nd 2025