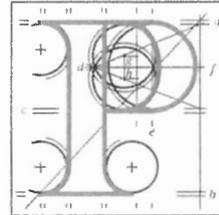


Our Case Number: ACP-323849-25



**An
Coimisiún
Pleanála**

Joe Murray
1 Old Westfields
North Circular Road
Limerick

Date: 16 January 2026

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 Farranshone 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

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Formal Observation / Objection

To: An Coimisiún Pleanála
Re: Proposed Development — Cleeves Riverside Quarter / Cleeves Riverside Campus
Applicant: Limerick Twenty Thirty DAC
Location: Former Cleeves Factory Site, North Circular Road, Limerick

ACP Reference: JA91.323849

I, the undersigned, submit this objection under the Planning and Development Act 2000 (as amended) and associated Regulations. I have a direct, material interest in the impact of the proposed development and its potential effects on the established residential neighbourhood.

While I welcome, a transformative regeneration of the historic site into the Cleeves Riverside Quarter, the current application raises serious concerns in relation to the following:

- Lack of Meaningful Community Consultation
- Lack of Understanding and Empathy towards the Established Settlement
- Architectural Design : Scale, Massing and Context
- Transport Strategy : Transport, Traffic and Safety
- Phasing and Deliverability
- Construction Impacts: Loss of Residential Amenity
- Housing Mix and Student Demand

I would like to state that I find it particularly concerning and ill-considered of the applicant, that the local community have only been given a mere six weeks to review thousands of pages of material and that the timing is in the run up to Christmas with the submission date of the 23rd December. This combined with the absence of meaningful pre-application engagement with local residents typifies the disconnect and lack of empathy displayed towards the community and its residents, by the applicant.

I was not able to fully review, let alone fully understand the thousands of documents submitted by the applicant in support of this application. I have concentrated instead on the **Planning Statement** itself and some of the supporting documentation where feasible.

Based on what I have read and understood of the planning statement I have categorized, on the following pages my areas of interest and concern.

Connectivity and Actual Availability of Public Transport

Under this proposal, bicycles are to be substituted for cars, bicycle parking/storage will be provided instead of providing adequate car parking. There is very little, if any, provision for car parking at this proposed development. Public transport in the form of bus travel is proposed for longer journeys while walking and cycling is proposed as the means of transport for shorter journeys.

Bus Transport

Bus Connects is regularly referenced as the panacea to providing meaningful access to useful and reliable bus transport. The reality is, that no part of Bus Connects exists in Limerick. According to busconnects.ie "the new network is scheduled to be delivered on a phased approach from 2027"

The roll out of Bus Connects in Dublin, Cork and Galway has run into many issues and resultant delays, there is no guarantee that planned routes for those cities will ever reach fruition. No successful roll out of "Bus Connects" has occurred in any Irish City to date. There is no guarantee that all or any of the proposed (Limerick) Bus Connects routes will or can be delivered.

It is impossible to see how the QBCs required to make "Bus Connects" work, could be built, given the width, curve radius and topographical characteristics of most of the roads surrounding, and adjacent to the site of the proposed development.

There are no existing bus routes, let alone bus stops, at the proposed development site, and none proposed by this application.

Walking and Cycling

All walking and cycling routes to the actual city center involve crossing the river Shannon. Shannon Bridge and Sarsfield Bridge are the only river crossings in the vicinity of the proposed development. These bridges are first and foremost, vehicular bridges.

Only one of those bridges (Shannon Bridge) has an actual cycle path - a temporary one, installed during the Covid pandemic. That cycle path has no connection to the proposed site and no connection to anywhere at the southern or city end of that bridge.

Sarsfield Bridge is narrow for vehicular traffic and have narrower-than-standard footpaths ~ perhaps this may be as the bridge is a protected structure? Has thought been given to how all new cyclists and pedestrians will be accommodated on these 2 bridges? Are there proposals for development of these? If not, then the brief of car-free living will be hampered.

It's not a nice, or a realistic prospect to walk or cycle across either of these bridges whilst being broadsided by wind and rain of the type that only, the full might of the Shannon Estuary can throw at you.

In Limerick, on the edge of the North Atlantic, we get these inclement weather conditions a lot! Apart from proposed storage for bicycles, there are no actual cycle paths planned or existing at the proposed development site.

Some Inaccuracies relating to the above.

P 13 P.S.(Table 11.1), it states "*the hospital and the train station sitting within a 15 minute walk radius.*" Walk Radius is like "as the crow flies" ; it has no bearing in relation to actual walk distance.

According to Google maps the shortest walk distance from the proposed development site to the Maternity Hospital is 12 min walk time, to Saint Camillus Geriatric is 13 min. The everyday relevance of these two hospitals in the context of the proposed development is questionable, the maternity hospital is scheduled to be moved to Dooradoyle to be co-located with the UHL. St Johns Hospital (Model 2S) is 24 Mins and UHL (Model 4) in Dooradoyle is 53 Min walk.

UHL is the relevant "hospital" in this context. 53min walk away! Ballynanty health centre is 21 Min, Kings Island Medical centre is 21min walk while the one and only train station, Colbert Train Station, is 20 Min walk time. This train and main bus station are co-located at this site.

On page 14 of the same document it states "*There is only one bus service (304) in Limerick city currently offering a 15 minute frequency. That service runs from Ballycummin in the Southern Environs to UL in the Eastern Environs. The subject application site is located 700m (10 minute walk) from the bus stop on O'Connell Street*".

The bus stop for the 304 to UL is on William Street not on O'Connell Street and it is 13min walk time from there to the proposed development site!

These inaccuracies continue to occur, for example the ***Sustainability and Social Infrastructure Statement*** produces various maps and data sets based on distances of 10min walk time. Figures 3a and 3b are perfect examples of these inaccuracies. On those particular maps; (on the south) the map indicates a walk time of 10min to the junction of Upper Mallow street and the R858 (Actual walk time according to Google Maps of 18 min) That map and others, (from which supporting data is derived), exaggerates distance (based on 10min walk time) north, south, east and west of the proposed development.

The "Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities" are very clear on this point. The associated guidance documents and application of the guidelines in local plans specifically link a 10-minute walk time to an approximate distance of 800m. This distance is considered a "preferred maximum" for accessibility to certain services and public transport nodes.

The viability of this proposed development, relies heavily on proximity to services and data garnered from census information, within a specific distance of the proposed development.

I request (1) that all inaccuracies based on distances and location of services be corrected and that all data derived from these inaccuracies (and subsequently) used to support this planning application be corrected with only the corrected information being used in consideration of this application.

I request (2) that all references to "planned" services, in particular Public transport services, Cycle paths, pedestrian bridges etc. be carefully considered in the context of their actual existence or realistic delivery.

Provision of Parking Spaces - the Car Free ideology

Is it fair to expect new residents of this proposed development, to live in any realistic way without a motor car? Likely, potential residents will already own a motor car and their lives and opportunities will be facilitated by car ownership.

Where will the car owning residents of this potential development then park these cars? If they have nowhere to park their cars, will new residents be obliged (contractually or de facto) to give up car ownership?

Why would it be fair for the new residents of this potential development, to see that all of their existing neighbours, in their new community, not only enjoy car ownership, but also have access to parking spaces for their cars?

As part of this proposed development, a building of historical significance (Fernbank House) will be demolished to provide approximately 30 car parking spaces as a "daily commute" car park for the exclusive use of the neighbouring primary school.

The proposal to provide this car park as part of this proposed development is simply placing the contradiction of "cars permitted" on top of "cars excluded" for different groups of people - which is it??

Being proposed here is a situation where two groups of people will exist side by side. Those living and working in the neighbourhood, who, have the freedom to travel to and from, where they wish, at the time of their choosing, or when the need arises, and those who will not have the enjoyment of car ownership, and therefore have to walk or cycle, or rely on the limitations and/ or unreliabilities of road based public transport. Why is this "apartheid" being proposed?

And how will family life be facilitated by this car ownership "apartheid"?
What happens (for example) on a Saturday morning when someone's child/children has, swimming at 8.30pm in UL and Hurling Training at Na Piarasigh at 10.00pm and after that were all off to "Granny's birthday in Mayo" for 3PM

No cycling, walking, car sharing or public transport will make this scenario possible, but facilitating car ownership would.

So, in this scenario, it would be possible for most kids currently living in the area to be able to experience these types of opportunities/activities, but not possible for most of the families residing in this proposed development?

The "ideological versus the reality" at this proposed development in relation to car parking is extraordinary. Limerick is a very small City, situated on the North Atlantic edge of Europe. Interpretation and application of Planning Guidelines and of National Policy Objectives, must focus on the reality of the "local" For instance (P60 P.S.) "National Policy Objective 43 – *Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location*".

Which planning guidelines or development plans are being used here, and what way is the proposer expecting that they be interpreted?

Traffic Access and Congestion.

At the Salesian's site, it is proposed that one entrance and exit be provided for all of the activities serving the proposed high rise tower blocks; the drop off and collection point for the primary school next door and the car park for the primary school next door. How will the inevitable traffic chaos at this entrance point be managed?

1. How will the collection of refuse be managed?
2. How will access to the car park for Salesians Primary School be managed? Will it be gated? Who will open and close those gates? Will the car park be accessible during holidays or at the weekends?
3. How will the primary school drop off and collection be managed (this currently occurs right across the proposed entrance point).
4. How will deliveries of any shopping be managed? ~ most residents have no cars under this proposal and so, therefore, presumably will be reliant on delivery service for their weekly shopping.
5. How will deliveries of takeaway etc be managed?
6. What mitigation measures are proposed to alleviate the dangers posed by all of these activities particularly at school drop off, and collection times?
7. What mitigation measures are proposed to deal with the safety issues posed by the gradient at this entrance point, e.g. frost in winter, stalled vehicle roll back, failed vehicle brakes etc.
8. How will "overspill" car parking be prevented anywhere in the vicinity of this access or along the internal access way into the tower blocks, if it is possible for overspill parking to occur, then none of these activities/services can run, with obvious implications for access by emergency vehicles.

I therefore request (3) that the proposal, to concentrate all of these activities/uses, at one small entrance point and access road, be reassessed and that all supporting documentation and assessments (in particular the TTA) in relation to traffic and congestion be carefully analyzed in considering this planning application.

This Planning statement for the overall proposed development of this site relies heavily on phrases such as "Planned", "Proposed", "Design work has since commenced" or "Memorandums of Understanding" to justify the proposal and to buttress an interpretation of the various planning requirements and guidelines in relation to transport, services and infrastructure.

It's perhaps noteworthy here that all references to "planned" or "proposed" public transport rely solely on road transport.

The roads around and adjacent to the proposed development are already congested and essentially, gridlocked at peak times - there's no Luas or Dart in Limerick.

In the context of ACPs consideration of this proposed development **I request (4)** that "Planned" Versus "Existing" be appropriately weighed.

Full consideration of this point should involve modeling the entire proposal where any or all "Planned", "Proposed", "Understandings" etc. do not materialise - would the proposed development stack up then? Would the proposed development fulfill its promised objectives, would the proposed development be successful?

The viability of this proposed development and in particular, its proposed type of residential use, relies heavily on proximity to services and data garnered from census information, within a required, specified, walking distance of the proposed development, as referred to above.

I request (5) that all inaccuracies based on distances and location of services be corrected and that all data derived from these inaccuracies (and subsequently) used to support this planning application be corrected with *only* the corrected information being used in consideration of this application.

Student Accommodation

The bulk of the proposed residential development on the actual Cleeves site is named as Student accommodation - Is this the best location for Student accommodation? Given that there are shovel ready sites available for student accommodation adjacent or on UL campus? At Pa Healy Road, 202 student bed spaces are proposed and 1,400 bed spaces in 196 apartments/bed clusters on the Groody Road. Both of these locations are on established bus routes, have dedicated cycle paths or are within 10min walk time of UL.

Similarly at Mary Immaculate College, planning applications have been lodged for development at Courtbrack Avenue and at Punches Cross. All of these sites are comfortably within a 10min walk time. So, why then propose the development of this type of accommodation so far away from two of the largest third level institutions in Limerick? Especially when proposed development and availability of development sites in and around both institutions should satisfy their demand for student accommodation?

Planning applications have been lodged for student accommodation at Hassetts Cross (10min walk time from TUS) and similarly, at Davis Street, literally across the road from Colbert Train and Bus station. All of these locations are either close to an actual third level institution or close to major transport hubs.

In all, there are currently student accommodation projects in Limerick with planning permission amounting to 1988 bedspaces. All are at better locations in relation to third level institutions and or established/installed transport and travel infrastructure.

TUS may locate part of its campus to the Cleeves site. There is no guarantee of this. And what exactly is the proposer expecting TUS to do here, is it proposed that TUS will move an entire self contained faculty or school to Cleeves? If not, what's the point! Otherwise will students be moving hither and thither for timetabled activities at different satellite locations throughout the city?

Phasing of the Student Accommodation proposal should then only follow as the need would arise. If TUS is going "in" then put in the accommodation at the same time. If TUS or any other third level institution do not locate at this development then this is the wrong location to build student accommodation. It is simply too far from where students need to be.

"In assessing a proposal for student accommodation, the Planning Authority will consider the cumulative impact of student accommodation, which exists in the locality and will resist the overconcentration of such schemes in any one area, in the interests of sustainable planning"

P63. P.S. There are a significant number of students renting from private landlords in Ireland as was highlighted in the National Economic and Social Council (NESC) Report "Ireland's Rental Sector: Pathways to Secure Occupancy and Affordable Supply" which was published in May 2015. The NESC report also outlined that on average, there are 2.73 persons per household in Ireland. While it is likely that the occupancy of a household comprising solely of students is going to be higher than the national average, it is a fair extrapolation to make that every 4 students housed in either PBSA or in Digs will free up an additional housing unit in the private rented sector that would otherwise have been occupied by students."

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

Responding to the above quoted texts from the Planning Statement - The same could be applied to the concept of providing for local people (or from outside) who might wish to "downsize" or "right size" to a suitable community setting with the appropriate provision for their existing or future care needs. As most people in the immediate vicinity are homeowners, the proposal would be self-funding and potentially free up larger residences for young families. Demographically there is a strong need for this.

I request (6) that the demographics figures from the corrected (10min walktime) maps be re-assessed in order to establish the potential demand for Down Size or Right Size homes with on site access to care provision. This could be put forward as an alternative use for a residential element at this proposed development. Was this potential residential use ever considered?

Height

At 34 meters, the tallest buildings proposed and the tallest in the vicinity are arranged in somewhat of a doughnut shape around the boundaries of the site. To put this height into context, 34m is about the height of the Verizon building on the south bank of the Shannon.

The 34 meter Tower blocks on the Salesians site bear no relationship with the surrounding buildings in Mass or scale. The proposed tower blocks are simply enormous, dominating structures.

No attempt at screening or tapering up or down to neighbouring or existing structures is evident from the plans submitted and nothing appears on the CGIs that would suggest anything other than what I have described above.

With reference to P72 P.S. "Table 11.1 Specific Planning Policy Requirements Urban Development & Building Height Guidelines 2018" and P100 P.S. "Table 12.5 Limerick City Building Height Objectives", **I request (7)** that these parts of the Planning Statement be carefully examined with reference to the actual description of the location, distances to services, availability of services, in particular (height implications) and this proposed development's impact on the existing built environment and community.

It's very difficult to visualize the precise heights scale and visual impact of most of the proposed high rise buildings on the site. Very few useful CGIs were produced, particularly in relation to perspectives taken from the NCR. CGIs viewed from the roundabout at Salesian's School etc would have been useful in illustrating the potential visual impact.

Datum points are also unclear. A recognisable datum point would be useful to fully understand height impacts. For instance, the previously mentioned roundabout could have been put forward to be used as an illustrative, datum or baseline point.

I request (8) that recognisable datum points be established to reference the proposed heights of buildings and that more CGIs from all vantage points and in particular the NCR, be produced.

Loss of Amenity

The proposed development seeks as Phase 1 to demolish all of the structures and amenities currently on the Salesians site,

- That includes the demolition of Fernbank House to make way for a 30 space car park for the exclusive use by Salesians primary school,
- The demolition of the sports hall currently being used by Limerick Celtics basketball Club and Salesians Primary School
- The demolition of the former Salesians Secondary school previously used by Limerick Educate Together and currently being used to house Ukrainian Refugees.
- The demolition and removal of the Marion shrine and grotto.
- Set down and car parking spaces for the Salesians School, the Sports Hall, former Salesians Secondary school and the Marion Grotto.

There is no funding in place for any other phases/development works, should this proposal be successful. It's quite likely that all of the above listed uses/amenities to create car parking (which already exists) will be lost, to create a hoarded up and derelict "cleared site". How long might it be hoarded up and derelict with the amenities and facilities currently on the Salesians site gone forever?

Proposed also under the plan or as a result of this plan will be the loss of the 90 space "euro" car park and de facto the amenity parking along O'Callaghans Strand.

The Euro Car park Facilitates Commuter Carparking during the working week, City shopping and socialising, amenity activities such as "walking the three bridges", drop off and collection for Ard Scoil Rais secondary school, Drop off and collection for Salesians Primary School, parking for the every day activities and events at St. Michael's rowing club.

Amenity parking along O'Callaghans Strand used to "sit and read the paper" or "just watch the river/world go by", parking to walk the dog, parking for walking the three bridges etc etc will be de facto gone. Those car parking spaces would be permanently filled with "over spill" parking as a direct result of not providing adequate car parking at the proposed development site.

Conclusion

Unfortunately, this proposed development has the potential to create division.

On the one hand, the existing community is being asked to accept the inevitable increase in traffic congestion, noise, loss of amenity, potential impacts on services and utilities and the visual impact of the overbearing, ill-designed buildings of a poorly-conceived development.

On the other hand, are our potential new neighbours being asked to accept that they cannot enjoy car ownership, as a result of inadequate parking provision, or will they have no choice but park their cars wherever they can in the surrounding neighbourhood - up on foot paths, across the entrance to peoples homes or on the footpaths of the proposed development itself.

The resultant overspill will involve the blocking of footpaths and lead also to traffic congestion on the already narrow roads in the immediate and surrounding areas. That's the sort of thing that creates "us and them" tension and conflict.

Surely this point alone should be a considerable cause for concern in relation to this proposal.

There are a lot of inaccuracies and a lot of "spin" used to craft a rosy narrative in support of this proposed development.

L&C Co Co. re-zoned its newly acquired site (the site of the proposed development) to "City Center" designation in 2022. This new re-zoning did not extend radially out from the Actual City Center (two streets in, on the south side of the river) the zoning discriminates its boundaries along the exact outline of the proposer's new site.

This area has never been considered a city center location. Its best description is that of a residential urban location. Situated on the northern bank of the river Shannon. It is a successful, long-established community in which the built environment is characterized by low rise residential homes built and evolved over the last 150 years.

Perhaps the following, (quoted from the planning statement) might shed light on the proposers' approach. P96. "The Development Plan acknowledges that the Cleeves site *"will deliver City Centre living and employment creation opportunities, while addressing the economic and social dereliction of this area of the City through large-scale revitalisation"*.

That statement illustrates, perhaps, the proposer's incorrect view of the existing community.

This area is not economically or socially derelict! The only dereliction that might be found in the area is entirely the responsibility of the proposer. The "dereliction" has only occurred under the ownership of the proposer. The proposer should be a good neighbour and not have allowed its property to fall into a state of dereliction. All neighbouring properties are in use and kept in a good state of repair.

Among proposed removal of amenities, is the removal of the Marian Shrine/Grotto on the Salesians site. No mention of this is made in the planning statement, again no consultation, no engagement, no employment of local knowledge, no sensitivity.

There seems to be an attempt to build a narrative describing some sort of decaying derelict community, situated in the heart of some sort of industrial wasteland. Guidelines and regulations designed for such a location are being interpreted and shoe horned here to justify this proposed development.

The "large-scale revitalisation" proposed could just as easily turn out to be a great missed opportunity to truly develop this site into an actual 'World Class Waterfront revitalisation and transformation project'. There is an opportunity here to provide residences for families and for downsizing/rightsizing and do it in the way that fits the established pattern and community of the settlement.

Development should be proposed at a scale that can be supported and integrated into the existing built environment and community.

The existing community is not a transient one, it's established, rooted and intergenerational.

This proposed development seeks to create a transient community, predominantly students and a lot of people who, when the opportunity or need arises, will move on.

P40 P.S."Salesians will create 166 no. new homes for Limerick. The apartments are made up of one-bedroom two-person apartments (46%), two-bedroom four-person apartments (42%) and three-bedroom five-person back-to-back triplexes (12%)." This must be viewed in the context of (P 9 P.S)." "The Urban Regeneration Development Fund (URDF) funding secured, (€34.5m), will assist in facilitating enabling works for the Cleeves site"

Before a single block is laid for the building of any residential unit on the proposed site, a staggering €34.5 million will have been spent!

To put this into context, that amount of money could build upwards of 150 Housing units, perhaps even more, on a normal serviced site. No one knows how much it might cost to build residential units on this particular site. There are aspirations to build, but no firm plans or commitments and certainly no committed finances.

There is a huge need for housing in Limerick City. This need is particularly acute for first time buyers and people starting families. This Proposed Development should seek to provide for the building of a permanent rooted community which could thrive, fit in well with and compliment the established settlement.

The subject of questioning or objecting to proposed developments and in particular residential ones is in particular, a very emotive one. As stated above, I recognise the acute need for housing and residential development in Limerick and I welcome residential development at this proposed location. However I firmly believe that the residential type and density of the proposed development here won't work. The history and outcome of poor and rash planning in relation to mass residential development throughout Ireland is poor. Would this development, as proposed, be any better?

I have numbered eight requests/questions as they occurred through this document. They are by no means exhaustive. My intention is that they be read in the overall context of this observation and that they might

illustrate my thoughts and points towards informing ACPs response to this Proposed Development. I would also like to suggest that ACP visit the area to get a feel for the character of the community, its built environment and the settlement in general.

In summary, I respectfully request that An Coimisiún Pleanála give careful consideration to the issues and points I have raised here, in determining the validity of this proposed development.

Name: Mr. Joe Murray

Address: 1 Old Westfields, NCR, Limerick

Email: ajoemurrayz@gmail.com

Date: 17.12. 25

Signature:

A photograph of a handwritten signature in black ink on a light-colored surface. The signature is stylized and appears to be 'Joe Murray'.