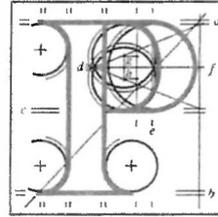


Our Case Number: ACP-323849-25



**An
Coimisiún
Pleanála**

Laurence Garric
Avoca
Clanmaurice Avenue
NCR
Limerick
V94 ACC9

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.

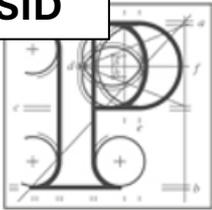
Yours faithfully,

Breda Ingle
Executive Officer
Direct Line: 01-8737291

JA02

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902



Observation on a Strategic Infrastructure Development Application

Observer's details

1. Observer's details (person making the observation)

If you are making the observation, write your full name and address.
If you are an agent completing the observation for someone else, write the observer's details:

(a) Observer's name

Laurence Garric

(b) Observer's postal address

Avoca,
Clanmaurice Avenue,
NCR,
V94 ACC9 Limerick

Formal Observation / Objection

To: An Coimisiún Pleanála

Re: Proposed Development — Cleeves Riverside Quarter / Cleeves Riverside Campus

Applicant: Limerick Twenty Thirty DAC // Limerick City and County Council

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

ACP Reference: JA91.323849

Observations on the Cleeves Development Impact

By Laurence Garric, Resident

There are two parts to this document/planning objection:

The first one, is a practical description of how this development will affect me in a practical, liveable, day-to-day life. This development plan omits planning best-practice, and this is what the first part of the document is trying to show.

The second part of the document goes into more detail on specific points.

Part I – Impact on our current residential amenity

As a long-time resident of Clanmaurice Avenue, I am watching with growing concern as plans for a massive high-rise development take shape in our neighbourhood, which is not in character with the existing two-storey semi-detached and terraced residential houses. What I am observing is not just massive construction project—it is the dismantling of a functional community and quality of life for both existing and future residents.

Loss of Sunlight and Privacy on Residential Amenity

My home, like many here, is south facing. We designed our lives around that orientation—large windows to capture Ireland's precious winter sun, solar panels on the roof, a productive garden and greenhouse. The proposed towers will cast permanent shadows over homes and gardens that have enjoyed full sun for decades. My solar panels (on the shed), installed at considerable expense to reduce our carbon footprint, will become largely useless. My very large polytunnel, where I have cultivated fruit and vegetables for years, will sit in perpetual shade for six to eight months of the year. The passive solar heating that keeps energy bills manageable in winter will vanish.

The shadow assessments do not accurately show the winter shadow cast by the development or give a perspective for the Clanmaurice residents.

This is not to mention the privacy loss also caused by the overbearing high-rise accommodation very close to our back wall.

How do you compensate someone for taking away years of sustained efforts to build a productive outdoor space, both in terms of food production and energy sustainability from the sun?

The Construction Phase

The construction phase alone will be lengthy and trying. We have already suffered years of work below the house through the construction of the Verizon building and the paving of O'Connell Street. The noise generated by the builders in the old quarry echoes and amplifies before reaching our gardens. At times, construction noises went on until well past midnight, to start again around 3.30am, preventing sleep for many of us, including children, for months! Complaining to the local authority did not improve this situation, although it should not have happened in the first place, therefore it is hard to have trust in the local authorities.

On the subject of trust, Limerick 2030 have shown little concern about the local residents, future residents and the local environment. The very limited environmental impact assessment can be explained by the fact that they ordered the removal of all vegetation prior to the environmental impact assessment, in the springtime of 2021 during the Covid lockdown when no outside work was allowed. Complaints were made to LCCC about breaking lockdown work rules but there was no reply. The reason for the works is clearer now in hindsight. Indeed, the vegetation in question was home for nesting birds, butterflies, bats, foxes. We subsequently observed a great reduction in population of all those wild animals. There are still bats in the area, and herons seem to be nesting in the Cleeves buildings.

The large car park (maybe 130-150 spaces) located beside St Michael's rowing club, that currently serves city workers and visitors and has been in use for over a decade, will become an equipment staging area. Where will everyone park? Already our narrow avenue struggles with traffic—soon it will be impossible. Bin trucks, and at times, ambulances, cannot access the back of the avenue as people park their cars on both sides of the avenue, making it impossible for large vehicles to access.

The dust, as has happened already for many years, will cover everything—our homes, our gardens, our lungs. Please keep in mind that we are very well aware this construction will be going on for years!

One of the two streets leading to our avenue will be closed for construction access. What is already unmanageable traffic will become gridlock. Having stood by the side of the Salesians school with a friend collecting her child, I experienced firsthand the effects of the car pollution as cars stand still all along Shelbourne Road, unable to keep going due to traffic.

Ask:

- that a net be put in place during construction to break down the noise waves, as well as prevent some of the dust from flying.
- Improve the traffic plans to be more realistic to the current state, a little worse is actually a lot worse for what is already a poor traffic flow area.

Inadequate Assessment of Impacts on Protected Site:

The proposed development site directly borders the River Shannon Special Area of Conservation (SAC) and associated wetland habitat. The Environmental Impact Assessment submitted fails to provide sufficient evidence that construction activities will not adversely affect this European-protected site and its biodiversity.

Specific concerns include:

1. **Construction Impact:** The raising of North Circular Road and demolition works have not been adequately assessed for their impact on local biodiversity, including protected bat species known to roost in the area.
2. **Contamination Risk:** Construction activities pose a significant risk of contaminating the on-site pond through sedimentation, chemical runoff, and construction debris. This pond has a direct hydrological connection to the River Shannon SAC. Any contamination could flow into the protected site, potentially breaching Ireland's obligations under the EU Habitats Directive.
3. **Inadequate Mitigation Measures:** The planning documents do not contain sufficient detail on how contamination will be prevented during the construction phase, nor do they adequately address protection measures for bat populations during demolition.

Given the proximity to a European-protected site, the precautionary principle should apply. Development should not proceed without comprehensive ecological assessment and robust mitigation strategies.

The Traffic Crisis

Here is what planners seem to have missed: there is no public transport infrastructure existing or planned for this area. No bus or smaller shuttles. No safe, uninterrupted cycling lanes. Just cars. The plan currently is to develop more housing without first developing infrastructure and amenities to support more housing. All vague promises and no actual plan.

And! The development plans show minimal parking—perhaps enough for a fraction of the hundreds of new residents. Where will everyone else park? The answer is already visible: both sides of our narrow avenue, making it impassable, as well as around the wider area, also greatly adding to traffic.

Our bin lorries already struggle to reach houses at the back of the avenue. Emergency vehicles will find it impossible.

And that is not an abstract concern—it is potentially life-threatening. If I or any of my neighbours have a stroke or heart attack or other health emergency, will the ambulance get through the traffic

in time? Will it be able to reach our houses through the parked cars? Will it get us to hospital through gridlocked streets?

We know that every minute matters with strokes and heart attacks. This development will cost us those critical minutes.

The Wind Tunnel Effect

The tall buildings will create a wind tunnel effect, funnelling already-strong south and western winds with increased velocity directly at our modest two-storey homes. Storm damage, which we already experience, will intensify. Roof tiles, fences, garden structures—all will face forces they weren't designed to withstand.

The Lost Privacy

Windows from six to seven-storey buildings will look directly down into gardens and homes that have enjoyed privacy for decades. The sanctuary of private outdoor space will become an overlooked stage. The student block in particular, which is set at an angle will look directly into our house from both their side and back windows.

The Pollution

More traffic means more pollution—for residents, for the nearby schools' pupils and teachers. Children will walk to school through clouds of exhaust from cars stuck in construction-induced gridlock, breathing in pollutants day after day.

The Community That Won't Exist

Perhaps most troubling is what is missing from the plans: community infrastructure. There are mentions in the plans for "potential" for amenities and such.

But there are no amenities planned. No community centre. No shops. No green spaces. No men's shed. No sports facilities. No craft or cooking class spaces. Nothing that builds community, where people could meet or gather for neighbourhood celebrations, children's birthdays... Instead, a gated community is what is subtly mentioned in the plans for the security of the residents, which ensures that the new and the current communities cannot mix, and that the current residents do not gain access to new amenities/facilities/shops/outdoor areas. This is supposed to be a development championed by the Local council, and not a poor quality overly high-density development with few amenities which serves neither the new nor existing residents.

The first building is planned for students. The second for potentially downsizing or young families. That's an odd, potentially problematic mix—young people wanting social space and activity, older people and young families wanting peace and quiet, and no facilities for either group.

But the bigger question is: how will integration happen? How will hundreds of new residents become part of our existing community? How will we become part of theirs?

There are no "third places"—the cafés, community centres, parks where people naturally meet and connections form. There is nowhere to host welcome events, organize activities, or build the social fabric that makes a collection of buildings into a community. We know from experience that high density areas with no social fabric do not last the trial of time, they become ghettos of anti-social behaviour. We can surely find a way to make this sustainable, on the long-term, an area where people want to live, not a low quality, high-density place with no amenities.

Instead, we will just be strangers living near each other. Three isolated groups: existing residents in our houses, students in their tower, downsizing or young families in theirs. Proximity without community.

Architecture and historical buildings

The Cleeves site is of immense industrial and political heritage (ref. Limerick Soviet). It is very important for Limerick to keep however little historical buildings we have. The Cleeves chimney, some of the buildings and the walls around, are old, and beautiful, and meaningful for the people of Limerick, and should be kept as much as can be. The same goes for Fernbank House, which has beautiful historical features, and is currently to be destroyed on the plans.

Ask: This should be reviewed to keep and integrate more history in this development. To avoid any accident, I also propose that Limerick Twenty Thirty and Limerick City and County Council be responsible for entirely rebuilding any damage that may occur on the chimney and other historical features that should be kept as part of the development.

The Planning Failure

Every piece of research on successful urban development emphasizes the same principles: mixed-use spaces, community amenities, green spaces, gradual integration of new and existing residents, adequate parking and transport infrastructure.

This overall development plan does not demonstrate any of this. The initial development phases definitely do not, and the later stages are only a concept currently and may not even happen.

It is not sustainable living—it is just high-density housing with all the problems and none of the solutions. We can see previous attempts to do this have failed with repercussions on inhabitants' lives, as well as their wider neighbourhood. What of Mount Kennett and Steamboat Quay just beside us in Limerick? In other cities, these would be seen as very sought-after areas. Instead, they were built fast, and are now, a couple of decades later, in poor condition and of poor quality for their residents with inadequate space and amenities.

Ask: that the development become something Limerick and even Ireland can showcase as a place of pride in the community, with beautiful architecture, and which encompasses all the known areas of improvement for the development of long-term, quality, sustainable mixed-use spaces, community amenities, green spaces for hundreds of locals and the wider community to enjoy, gradual integration of new and existing residents, adequate parking and transport infrastructure.

We know that the site is a complicated one to develop, due to its prior uses: as a quarry, as a brownfield industrial site, with potential chemical pollution, and within a low-lying flood risk area with an internal pond on the site flowing to the Shannon River, therefore increasing flood risks with ever rising water levels. These risks are not being assessed in a technical manner, other than being “considered” and dismissed. An outflow to the river is a very significant risk.

To quote Climate Ireland (EPA): *“Areas already at risk of flooding can be expected to be at increased flood risk whereas areas currently not prone to flood risk may become more prone to flooding in the future. This is particularly the case for areas located at the confluence of major rivers. These changes raise concerns regarding the integrity of flood defences, the capacity of the urban drainage system, the need for greater concern in planning and development of vulnerable areas as well as insurance implications for commercial and private properties.*

River and groundwater flooding

River and groundwater flooding is particularly prominent in the west of Ireland, e.g. the Shannon estuary, where levels of runoff are relatively high reflecting the east-west gradient in precipitation. In addition, levels of runoff from uplands are relatively high reflecting localised increases in precipitation due to orographic effects.” As demonstrated over the winter of 2013-14 by (Storm Darwin).

Lack of democracy:

Limerick City and County Council undemocratically relinquished their power on this project by creating Limerick Twenty Thirty (LTT), a private company, to plan and develop the site, bypassing the democratic rule of the councillors. However, the project is now being fast-tracked, past normal planning processes, by being submitted in the name of Limerick City and County Council. This has had substantial implications on the residents, with a mere 6 weeks, just before Christmas, to access the planning application, study and assess it, as well as its implications on our lives, then to submit our reservations.

We, as current residents of the area, want to gain from this development. Limerick already sadly lacks outdoor spaces and parks, accessible to all. If more high-density developments are built, more public outdoor spaces are required.

The Reality We Face

So here is what I am facing as a resident in the proximity of the Cleeves development:

- Loss of sunlight and passive solar heating
- Non-functional solar panels and large polytunnel
- Years of construction noise, dust, and disruption
- Impossible traffic and parking situations
- Increased pollution
- Wind tunnel effects on my home
- Loss of privacy
- Potential emergency access problems that could be life-threatening
- No integration with hundreds of new neighbours
- No community infrastructure to build connections
- Transformation of a functioning neighbourhood into a fragmented, isolated collection of separate groups
- Years of hardship and uncertainty, for no gain, only more disruption and no improvement to be expected in the future
- Loss of historical and political architecture
- Loss of biodiversity

The Question

I am not opposed to development. I am not opposed to more housing. I am opposed to bad development that diminishes quality of life for everyone—both existing residents and the newcomers who will arrive expecting a community and find only isolation. This development, as currently planned, will diminish our property's value. However, if it had been planned with the development of Limerick and the community in mind, it could have increased our property's value, financially, and in quality of life.

My question for the planners and developers is simple: Have you actually thought about how people will live here? Not just exist, but live—with sun, space, air, community, connection, and basic services like emergency access?

Or have you only thought about how many units you can fit?

Because from where I stand, watching the plans unfold, it looks like the latter.

And we will all pay the price—in darkness, in isolation, in traffic, in lost community, and potentially in lives when emergency services cannot reach us in time.

Is this really the future we are building for Cleeves and the wider community?

These observations are based on the current development plans for Cleeves. I would have welcomed dialogue with planners and developers about how these concerns might be addressed but can now only object.

Part II – Specific Points

1. Introduction and Standing to Make This Observation

I, Laurence Garric, submit this objection under the Planning and Development Act 2000 (as amended) and associated Regulations. I have a direct, material interest in the impacts of the proposed development and its interface with the established residential neighbourhood.

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

- A. Coherence of Urban Design: Urban and Architectural Design, Scale & Context
- B. Loss of Residential Amenity (Light & Privacy)
- C. Transport, Traffic & Safety
- D. Prematurity & Deliverability
- E. Local Heritage
- F. Environmental Impacts
- G. Construction Impacts
- H. Housing Mix & Student Demand
- I. Lack of Clarity in Planning Process & Community Consultation

This submission is made in good faith and in the interest of proper planning and sustainable development.

2. Description of the Proposed Development & Context

Phase Two comprises approx. 234 residential units, 270 student beds, limited commercial space, crèche, public realm, and road alterations. The site directly adjoins established residential areas (North Circular Road, Fernhill, Stonetown Terrace, Clanmaurice Avenue/Gardens).

2. Grounds of Objection

The scheme is ambitious but presents significant issues regarding urban design rationale, block positioning, height transitions, permeability, heritage integration, and impacts on neighbouring two-storey housing, particularly Clanmaurice Avenue.

A. Coherence of Design Approach

A.1 Architectural Design: Massing & Context

The proposed 5–7 storey blocks do not reflect the site's industrial character nor respond to adjoining low-rise neighbourhoods. The lack of height transition to Clanmaurice Avenue results in overbearing and visually intrusive development. This inadequate transition in height and massing, breaches: **Objectives CGR O3, O6 and O9** of the Development Plan and the **Urban Development and Building Height Guidelines (2018)**, especially Section 3.

Relief Sought:

- Limit buildings within 30m of Clanmaurice Ave. to 3 storeys
- Step back higher elements; vary rooflines
- Stronger integration of industrial heritage and material diversity

A.2 Urban Design: Permeability & Legibility

The scheme lacks clear pedestrian/cycle permeability, hierarchy of streets, or active frontages. Ground floors are inactive and dominated by services; commercial use is limited to a single peripheral unit.

Relief Sought:

- Introduce coherent street grid and central civic space
- Provide meaningful mixed-use and active ground floors

B. Loss of Residential Amenity: Overshadowing, Sunlight & Daylight and Privacy

The applicant's daylight report lacks independence, transparency and adequate modelling for Clanmaurice Avenue.

There is no cross-sections, sightlines, photomontages or visual analysis from Clanmaurice Ave., contrary to Development plan Objective **CGR O3 and CGR O6** and Building height guidelines 2018, Section 3.2.

This breaches:

- **Fitzpatrick v ABP [2022] IEHC 296**
- **Building Height Guidelines (Section 3.2)**
- **Clarke v ABP [2019] IEHC 838**

Relief Sought:

- Independent BRE-compliant daylight/sunlight assessment
- Provide missing drawings, balcony/window maps, sightlines and photomontages
- Apply obscure glazing, privacy fins, and boundary landscaping where separation <22m

C. Transport Strategy: Transport, Traffic & Road Safety

Public transport integration is minimal; the proposed “mobility hub” is inadequate. Reliance on uncommitted future mobility plans is unsound. The TTA omits key traffic generators (schools, hospitals, crèche), ignores existing congestion, and provides no meaningful analysis of Clanmaurice Avenue.

C.1 Reliance on Undelivered Future Mobility Plans: Applicant relies on behavioural change, future modal shift and Limerick 2040 mobility proposals to be implemented. Yet there is no committed upgrades; no NTA coordination.

C.2 Deficient TTA: Fails to assess congestion, emergency access, schools(4) peaks , or parking pressure on residential streets.

C.3 Road Safety Risks: No DMURS assessment, Road Safety Audit, cyclist/walker mapping or construction-phase safety plan.

C.4 Local Impacts on Clanmaurice Avenue: No capacity analysis or mitigation for a street already under parking and access stress.

C.5 Construction Traffic Hazards not adequately assessed: No CTMP, HGV routing, or safe pedestrian diversions.

C.6 Cumulative Impacts Not Assessed

This breaches:

- **DMURS (2013)**
- **TII Traffic & Transport Assessment Guidelines (2014)**
- **Objective TM O1** of the Limerick Development Plan
- **Clarke v ABP [2019] IEHC 838**
- **Morrissey v ABP [2022] IEHC 242**

Relief Sought (Transport):

- Updated TTA;
- Stage 1/2 RSA;
- Full and binding Construction Traffic Management Plan;
- prohibition of construction access via Clanmaurice Ave.;
- DMURS-compliant mitigation;
- revised mobility strategy.

D. Prematurity, Phasing & Deliverability

Phase II is mono-tenure and dependent on later phases (TUS, Shipyard) with no guaranteed delivery. There is no development partner, student accommodation operator, or binding construction contract. This raises legal concerns regarding premature and piecemeal development.

Relief Sought: Identify delivery partners; provide funding assurances; enforceable phasing; operational management plan.

E. Local Heritage: Fernbank House

Fernbank House (c.1860) is omitted from documentation and proposed for demolition despite its architectural and historical value. Its loss contradicts heritage policy and best practice, and ignores local historical research and precedent projects for adaptive reuse. This breaches:

- **Objectives BHA O1, O4 and O6** of the Limerick Development Plan
- **Architectural Heritage Protection Guidelines (2011)**
- **Moore v DCC [2018] IEHC 190**

Relief Sought:

- List Fernbank as a protected structure;
- provide conservation and structural reports;
- propose adaptive reuse;
- integrate into masterplan.

F. Environmental Impacts

F.1 EIAR Accessibility: The EIAR and NIS are not easily accessible, are overly technical, and fail to clearly present impacts on hydrology, ecology, traffic, construction, and flood risk.

F.2 Biodiversity Baseline: Vegetation removal before surveys undermines the validity of the baseline.

F.3 Construction Environmental Impacts: Mitigation depends on visual checks and discretionary enforcement; real-time monitoring is absent.

F.4 Flood Risk Assessment: FRA relies on future flood relief works not yet delivered; lacks site-specific analysis of displacement, climate change, or surface-water pathways.

Relief Sought:

An accessible EIAR/NIS documentation to enable the public to exercise their statutory right to meaningful participation; A stakeholder communications plan; real-time dust/air/noise/vibration monitoring (incl. PM2.5); localised air baselines; wind-flow analysis; stricter noise hours; enhanced water-quality monitoring; full remediation of contaminated soil; No occupation until flood-relief scheme operational.

G. Construction Impacts: Loss of Residential Amenity

No full and binding CMP, CTMP, phasing schedule, haul routes, or pedestrian safety plan is provided despite multi-year disruption. Reliance on future contractors and vague “best practice” is contrary to planning law.

This breaches:

- **Sweetman v ABP [2007] IEHC 153**
- **Heather Hill v ABP [2022] IEHC 601**
- **Balz v ABP [2019] IESC 90**
- Basic environmental and public safety obligations

Relief Sought: Full CMP, CTMP realistic phasing plan, haulage strategy, safe walking routes, and detailed real-time environmental monitoring.

H. Housing Mix & Student Demand

The scheme overprovides small units and student beds, with minimal family housing. Delivery timeline (2030) questions the validity of student demand projections given competing PBSA schemes.

Relief Sought: Reassess housing mix and student demand.

J. Unclear Planning Process & Lack of Meaningful Community Consultation

Residents have only recently discovered that the application has been lodged under Section 175/177AE of the Planning and Development Act removing the appeal rights, leaving the only recourse judicial review. Residents had only six weeks and the timing is before Christmas (due date 23rd Dec) to review extensive documentation. This combined with the absence of meaningful pre-application engagement with local residents is contrary to the principles of community engagement in the Office of the Planning Regulator guidance and Development Plan requirements (Section 11.2.3).

3. Conclusions

The proposed development is inconsistent with proper planning due to deficiencies in design coherence, height transition, amenity protection, transport assessment, environmental documentation, heritage protection, deliverability, housing mix, and community consultation.

I respectfully request that An Coimisiún Pleanála:

1. **Refuse permission in full**, or
2. **Impose above outlined relief sought**; Context design and scale to the existing homes, a full CTMP, traffic restrictions on Clanmaurice Avenue, a defined operator, funding and phasing, real time environmental monitoring and protective measures for Fernbank House.

Signature Block

Name(s): Laurence Garric

Address: Avoca, Clanmaurice Avenue, NCR, V94 ACC9 Limerick

Date: 23rd December 2025

Signature(s): *Laurence Garric*

Resident of: Clanmaurice Avenue