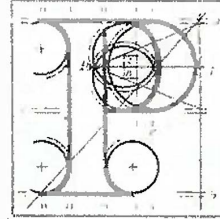


Our Case Number: ACP-323849-25



An
Coimisiún
Pleanála

Limerick Chamber
96 O'Connell Street
Limerick
Co. Limerick

Date: 11 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 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
Glao Áitiúil
Facs
Láithreán Gréasáin
Ríomhphost

Tel
LoCall
Fax
Website
Email

(01) 858 8100
1800 275 175
(01) 872 2684
www.pleanala.ie
communications@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902



Re: Case Reference JH91.323849

Dear An Coimisiún Pleanála,

Firstly, we would like to commend Limerick Twenty Thirty for bringing forward this planning application, hopefully this is a sign of increasing provision of affordable worker housing in Limerick.

Secondly, Limerick Chamber supports this development and planning application. This type of density and development is exactly what cities like Limerick require from both a forward planning perspective and indeed combating the housing crisis. The expedient advancement of Phase 2 and residential accommodation in Limerick is urgently needed, as our 400 (approx.) members tell us the lack of same is becoming a significant impediment to business growth in the region. We call on An Coimisiún Pleanála to quickly approve this application to facilitate that and we would encourage Limerick Twenty Thirty to increase pace of delivery in Limerick to this end.

We do have several specific comments for consideration which we have set out below.

Development Mix

Limerick Chamber welcomes the diversity in provision of home sizes as part of the planning application

Residential	Studio	1-bed	2-bed	3-bed
No. of Homes	6	97	102	29
% of Total Residential *	3%	42%	44%	12%

*Rounded to nearest percent

This adequately takes into account the diverse range of requirements for housing in the city, while being mindful of the pent-up demand, and lack of historical delivery for 1 and 2-bed homes.

Furthermore, the inclusion of Purpose-Built Student Accommodation (PBSA) is most welcome, as one of the key economic drivers of Limerick is our education sector, and historically students have been poorly catered for when it came to housing. However, we must ensure that an adequate funding model and agreement is in place to bring forward PBSA spaces. If not, there should be a contingency plan in place to convert this portion of the site to regular residential accommodation.

We understand the planning requirements to include a creche, however, as highlighted in other submissions by Limerick Chamber, there is concern regarding adequate demand for the operation of such a facility in this area. We understand the current fit out costs for a creche is prohibitive to investment and operation. Of course, this is an issue with the planning process and not this development in particular.

The inclusion of public open space, green roofs, car club spaces and solar panels is most welcome.

Tenure Mix

While this development has been designed as tender blind, it must be mentioned that there is a historical lack of affordable and worker friendly housing delivered in Limerick City over the last decade. When it comes to implementing a tenure mix on the site, Limerick Chamber would like to see 90% of the residential homes as worker friendly homes, be that through purchasing or rental, with the Part V allocation to be 10% for social housing, as is required by legislation.

Limerick Chamber's recent Employee Housing Survey gathered the views of the target market for affordable and market housing options across Limerick. We found that 94% of employees would like to buy a house, while 38% would like to buy an apartment. Existing homeownership rates in the immediate vicinity of this planning application are relatively high, at approximately 47% as per the last census. There is a desire to own apartments amongst the working cohort and there is accordingly a need to create more home ownership options in the city centre. We understand the cost of delivery of apartments is often prohibitive to owner occupiers, however, we ask that Limerick Twenty Thirty remain flexible in this regard in the event of improved supports for apartment purchases being made available by Government in upcoming budgets.

In an ideal scenario, there would be homes available for affordable purchase on this site, however we understand in the current environment that this may not be possible due to the high costs of apartment construction. Of course, there is always the option to decrease the number of apartments on the site in favour of more affordable purchase options and lower densities. However, this would mean losing density and of course the overall number of units on the site i.e. not utilising this site to its full potential – therefore we do not think that this approach is appropriate considering it would mean a loss in the total number of homes available.

The priority must be delivering the maximum number of homes possible for the working population. However, it is possible that in the future greater financial support will be available from Government for individuals to purchase apartments, if this becomes the case, we ask that Limerick Twenty Thirty be flexible in its approach to the mix of homes for sale versus rent.

Car Parking

Within the immediate vicinity of the Cleaves site, 15.5% of households have no car, while 84.5% have a car as per Census 2022. The number of households with a car varies, ranging from 1 car households to 4 or more cars.

In terms of commuting patterns, excluding not stated categories, and again examining the CSO Small Areas within the immediate vicinity, outlines that Car / Van Driver or Passenger is the largest share at 42% and is the most popular mode of travel followed by on-foot (33%) and Bus (7%).

While Limerick Chamber recognises and support the broader policy goals of reducing car dependency and increasing public transport, focusing on Limerick Chamber's recent *Employee Housing Survey*, 86% of respondents cited affordability as their number one priority, 75% for security of tenure, and 65% cited car parking as an important aspect of the development followed by green / outdoor space at 44%. There is a concern regarding lack of parking from the target cohort (those living at home with family or in other rental accommodation), as when asked if they would consider living in an apartment with limited or no private parking, 45% said they would find this attractive, while 17% remained neutral and 37% unattractive i.e. there is a target market for lower car dependency accommodation.

We understand that with regards to this development, as with other developments, there is an opportunity cost with increasing parking that may be less space for home options and people. We are not advocating for additional parking on this basis. **The priority must be delivering the maximum number of homes possible for the working population while integrating the site into wider public and sustainable transport options.**

Phases 3 and 4

While outside the scope of this planning permission. Limerick Chamber asks that Limerick Twenty Thirty to be flexible in its approach to future development mix on the site. There needs to be flexibility to respond to the challenges of the day when these phases officially enter the planning phase. Currently, Limerick Chamber would be concerned regarding the lower share of provision of residential housing options in favour of educational and commercial space in later phases. Based on the challenges Limerick currently faces, the view of Limerick Chamber is that the primary purpose of the site should be heavily weighted towards residential accommodation. That said, there must be built in flexibility in phases 3 and 4 to accommodate the infrastructure challenges and gaps of the day whether the focus should be to prioritise residential, educational or commercial space. Said differently, ultimately the plan must be agile to respond to the market needs at time that planning permission for Phases 3 & 4 is sought in due course to ensure efficient maximisation of the available space on the site and the mitigate the potential impact of a long term underutilised vacant site.

Summary

Limerick Chamber supports this planning application and would like to see an expedited delivery timeline to begin construction of urgently needed Limerick city centre homes on the site pre-2028.

Seán Golden
Director of Policy, Limerick Chamber