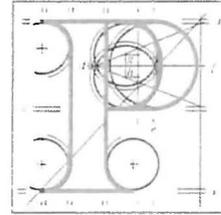


Our Case Number: ACP-323849-25



An
Coimisiún
Pleanála

Maura Moore
3 Old Westfields
NCR
Limerick

Date: 20 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, 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 Settlements in the vicinity of the proposed development
- Built Design : Scale, density and Context
- Transport Strategy : Transport, Traffic and Safety

It is ill-considerate of the applicant that the local community have been given a mere six weeks to review the considerable number of documents and that the submission date is Christmas week. 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. The public consultations meetings were meaningless – There was no open format where the Applicant addressed attendees and took questions from the floor.

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

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.

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? How will family life be facilitated by no car ownership proposal when there is a need to bring a junior family member to training, social activity etc some distance away, parents with young families travelling with buggys, cots etc.... It would seem from the proposal that families are not welcome in this proposed development.

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

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. What mitigation measures are proposed to alleviate the dangers posed by all of these activities particularly at school drop off, and collection times?

I request that the proposal to concentrate all of these uses at one small entrance point and access be reassessed by your Office.

The roads around and adjacent to the proposed development are already congested and essentially, gridlocked at peak times - In the context of ACPs consideration of this proposed development **I request** that "Planned" Versus "Existing" be appropriately weighed.

Height

At 34meters, the tallest buildings proposed and the tallest in the vicinity are arranged in somewhat of a doughnut shape around the boundaries of the site.

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** 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.

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. Are these not worthy considerations to take into account?

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 is a lot of spin in this proposal to create a cosy narrative –but the reality will be that the new development is not conducive to young families, it will promote a transient population, cause tension with existing settlements.

This area has never been considered a city center location. Its best description is that of a residential urban location. 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! Please look at the most recent CSO census for the socio-economic rating for the area. 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. All neighbouring properties are in use and kept in a good state of repair.

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)

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!

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 and difficult one and one that I have thought long and hard about before putting in this observation. As stated above, I recognise the acute need for housing and residential development in Limerick and I welcome residential development at this proposed location but it has to be right type of development. As set out in the applicants proposal – the development (density and type wont serve the new residents or existing residents well. I want the development to work for everyone.

In summary, I 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: Mrs. Maura Moore

Address: 3 Old Westfields, NCR, Limerick

Email: mauramoo2@hotmail.com

Date 20.12. 25

Signature:

