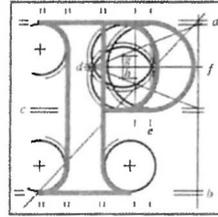


Our Case Number: ACP-323849-25



**An
Coimisiún
Pleanála**

N Hughes
Ennis Road
Limerick
V94 N1YN

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,

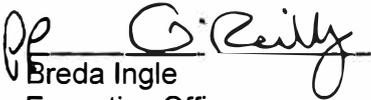
An Coimisiún Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

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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An Coimisuin Pleanala
64 Marlborough Street
Dublin

Limerick City and County Council
Merchants Quay
Limerick

Re: Planning Application Reference ACP-323849-25

I wish to make a submission in relation to this proposed large-scale residential development of approximately 500 units, a significant proportion of which is proposed as student accommodation.

Overall, I welcome the redevelopment of this strategic site close to Limerick city centre and support, in principle, the delivery of housing and student accommodation in accessible urban locations. I also support the objectives of compact growth and reduced car dependency where these can be achieved in a realistic and evidence-based manner.

Notwithstanding this support in principle, I have concerns regarding transport capacity, parking provision, traffic modelling methodology, and road safety, which I believe require further consideration and, if addressed, would significantly enhance the quality and sustainability of the development.

The surrounding road network is already subject to significant congestion at peak times. The proposal provides for an extremely limited level of on-site parking (circa eight spaces), which risks displacing vehicular activity onto surrounding streets rather than eliminating it. Even developments with a strong sustainable transport focus generate servicing and delivery traffic, staff movements, visitor trips, taxis, ride-hailing activity, and emergency access requirements, all of which must be realistically accommodated.

I am also concerned that the proposal appears to remove or significantly reduce existing on street parking in the surrounding area. This parking currently serves a small number of long established residential properties, including buildings over 100 years old that do not benefit from off-street parking. The loss of this established parking capacity, when combined with the extremely limited on-site provision proposed, further exacerbates displacement effects and does not appear to have been adequately assessed within the transport analysis. This represents an additional cumulative impact on congestion, residential amenity, and road safety.

The transport strategy appears to rely on exceptionally high levels of walking as the primary mode of travel. While active travel is strongly supported by planning policy, modal share

assumptions must reflect real-world conditions, including Ireland's climate, seasonal weather patterns, periods of darkness, and peak-time travel behaviour. The assumption that the majority of trips associated with a development of this scale will be undertaken on foot on a year-round basis does not appear to be supported by sufficiently robust evidence.

Of particular concern is the apparent approach to traffic modelling. The transport assessment appears to model vehicular impacts primarily on the basis of the limited on-site parking provision proposed, rather than on the likely level of vehicular activity generated by a development of this scale. Restricting parking supply does not, in itself, eliminate traffic demand.

This raises a clear planning principle issue: impact assessments should assess likely and reasonable worst-case scenarios, rather than idealised or aspirational outcomes. An assessment which assumes behaviour change without adequate testing, equates parking restriction with reduced demand, or fails to account for displacement effects cannot be relied upon to accurately evaluate congestion, road safety, or emergency access implications. Existing congestion, combined with limited parking provision, creates a foreseeable risk of informal or illegal parking, with potential consequences for emergency access, pedestrian safety, and visibility at junctions, particularly during peak periods and hours of darkness.

In conclusion, while I strongly support the regeneration of this important city-centre site, I consider that the proposal would benefit from a more realistic and evidence-based mobility and parking strategy that fully addresses congestion, displacement, and safety concerns. If these issues are resolved, the development has the potential to be a high-quality, world class scheme that enhances Limerick city and sets a benchmark for urban regeneration.

I respectfully request that full consideration is given to these matters and require appropriate revisions or conditions to ensure the development represents proper planning and sustainable development.

N Hughes