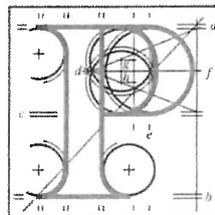


**Our Case Number:** ACP-323849-25



**An  
Coimisiún  
Pleanála**

Roger and Rose O'Brien  
Killumney  
1 Stonetown Terrace  
O'Callaghan Strand  
Limerick  
V94 HWK7

**Date:** 15 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](mailto: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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Baile Átha Cliath 1  
D01 V902

64 Marlborough Street  
Dublin 1  
D01 V902

Killumney,  
1 Stonetown Terrace,  
O'Callaghan Strand,  
Limerick V94 HWK7  
13th December 2025

An Coimisiun Pleanála,  
64 Marlborough St,  
Dublin 1 DO1 V902

Re: Objection to Planning Application for Proposed Residential Development  
at Stone Town Terrace/O'Callaghan Strand, Limerick. (Cleeves Site).

Case: JA91 323849.

Dear Sir/Madam,

I wish to object to the above Planning Application. My wife and I are the owners of Killumney, 1 Stone Town Terrace, O'Callaghan Strand, Limerick V94HWK7 which lies immediately to the East of the proposed development site.

Currently, Stone Town Terrace is a collection of five dwellings which pre-date the original Cleeves development; appearing on a map of Limerick dated 1841.

Resulting from the urban location of our properties, all of our external amenity spaces (Gardens) are located at the front (West facing) side, and our back is comprised of a small yard only.

The proposal for an 18.3m high building containing 21 apartments over 4/5 storeys represents a substantial over-development of the site. The building's scale, height and massing are out of character with the established low-rise residential context of Stone Town Terrace, and are contrary to proper planning and sustainable development.

At just 8 metres from our boundary and 23 metres from our house, the structure would be visually overbearing and dominate the outlook from our property and surrounding homes. It would introduce a scale of development entirely inconsistent with the existing streetscape and residential pattern, and would result in the devastating loss of amenity as detailed under the following headings:

1. Loss of Sunlight and Daylight
2. Loss of Privacy and Overlooking
3. Loss of Residential Amenity/Overbearing Character
4. Inadequate Parking and Traffic Impact

## 1. LOSS OF SUNLIGHT AND DAYLIGHT

Our only useable outdoor amenity space is our front garden, which because of its sunny aspect, south west facing, with sun well into the evening, is planted to a Mediterranean scheme with thriving mature fruit bearing grape vines and olive trees. If this apartment block is allowed to be built we will have no sunshine in large parts of our front garden at any time of the year from lunchtime onwards, with devastating consequences for our home environment and amenity.

I would also like to make the following observations in respect of the planning submission by Limerick Twenty Thirty:

1a. Ireland does not have a Standard for Daylight, Sunlight and Overshadowing and instead extensively uses the British BRE Guide-3rd Edition BR 209 Site Layout Planning for Daylight and Sunlight and BS EN 17037-2018+A1-2021 Daylight in Buildings. These are Guides only (Not enshrined in law) to the MINIMUM necessary to support well-being in the UK. This Once-in-a-Generation opportunity to create something outstanding on this iconic site is being designed to minimum UK standards only.

1b. The guides concern themselves with buildings (more specifically our living room), and consider that everything is compliant if 50% of our garden gets 2 hours of sunshine, and our living room gets only 1.5 hours of the sunlight available on the 21st March. The guide also states that "exposure to sunlight is an important quality criterion of an interior space and can contribute to human well-being." Currently we enjoy available sunlight all year round, with the afternoon sun streaming in through our sitting room window in the afternoons even in the middle of winter. This building will cast a shadow that will deprive us of sunlight to most of our property after midday for large parts of the year.

1c. Section 5.1 of the IES submission contains pages of plans purporting to illustrate their shadow analysis, but they are all too small to read. The tables accompanying these show VSC numbers before and after construction. VSC (Vertical Sky Component) numbers relate only to the percentage of sky that can be seen from a window - not the amount of sunlight in the room and this gives a favourable impression and does not take

account of our living room that is flooded with available SUNLIGHT all day being reduced largely to late morning sunlight only.

1d. Sunlight in the garden is measured as APSH (Available Probable Sunlight Hours) and the standard to which all this is being designed - the MINIMUM standard as stated earlier is 2 hours of sunlight on 50% of the garden On the 21st March. Our garden currently gets available sunlight to most of its area for most of the day. I have carried out a sunlight analysis for our front garden, (Our only amenable space that receives sunlight on the 21st March), and the results confirm that the amount of sunlight that will reach 50% of our garden on 21st March as a result of this development is only 1.15 hours which is far below the Guideline of 2 hours and far below the purported amount in the LTT submission. See calculations - Appendix 2.

How can this be described as minimal impact by those seeking this permission, as a result of this alone I respectfully suggest that planning permission should be refused.

In the report "Daylight, Sunlight and Overshadowing Study" prepared by IES and submitted as a part of their Planning Application section 1.5 page 6 they make a wildly inaccurate statement as follows: "These results highlight that the proposed development will have minimal impact to the sunlight received to these existing neighbouring properties. Overall the impact to the existing adjacent properties sunlight will be negligible". This statement is blatantly untrue and was designed to mislead An Coimisiun Pleanala into making a favourable decision.

1e. Again in paragraph 7.4, page 58 of the IES document it states " These results highlight that the proposed development will have minimal impact to the sunlight received to these neighbouring properties. Overall the impact to the existing adjacent properties sunlight will be negligible". This is completely untrue.

1f. In the "O'Callaghan Strand Design Strategy", Section 7.3, "Massing and Height", they state .....reducing visual impact and improving sunlight/daylight to the surrounding neighbours". This building does not improve sunlight/daylight to the neighbours, in our case it decimates it. This is completely dishonest, erroneous and designed to mislead the decision makers into a favourable decision. Their entire focus is on what happens INSIDE the development with scant consideration for the neighbours.

## 2. LOSS OF PRIVACY AND OVERLOOKING

The proposed development comprises of 21 apartments over four/five floors (3 floors over ground floor commercial space topped off by a fifth floor incorporating plant rooms and communal amenity space) with windows looking directly into ours. Of the 21 apartments 6 have wrap-around balconies looking directly into our property. The lowest level looks directly into our bedroom, with the others towering above it and looking down

into us. Currently our front garden (our only usable outdoor amenity space) is nicely lit and we enjoy it from our sitting room windows in the dark evenings. If this development is allowed to proceed we will have to keep our curtains closed for privacy resulting in a very closed claustrophobic home environment.

### 3. LOSS OF RESIDENTIAL AMENITY/OVERBEARING CHARACTER

3a. The proposed development has excessive height and mass and given that there is no set-back (It is located on the site boundary), it has an extremely negative and overbearingly dominant impact on neighbouring properties and character of the area. Viewed from any window of any house at the lower end of Stone Town Terrace, or the penthouses in Lansdowne Hall, this enormous monstrosity will completely dominate the view. This is all the more relevant as all existing buildings on Stone Town Terrace, (commercial as well as residential), are exclusively two storey vs this 4/5 storey monolith.

3b. The roof (5th storey of this proposed residential block) contains a roof garden looking west (away from us) and an area for mechanical plant running the entire length of the building immediately in front of our houses. Our concern is that we are going to experience unacceptable noise, both day and night from compressors, pumps, fans etc., as the building is so close to us and the ventilation louvres are facing us. LTT do allude to 24/7 increase in noise which will be audible particularly at night. I am respectfully asking that the ventilation louvres from this roof plant face away from us, and additional acoustic treatment be given to the roof facing us.

3c. In the Arup document, Traffic and Transport Assessment, page 33 it states that "Waste generated at the O'Callaghan Strand Zone will be collected along Stone Town Terrace. In the Atkins Realis report "Outline Operational Waste Management Plan", page 22, there is a drawing showing 4 doorways cut into this fine old cut stone wall that we were assured was to be preserved, and immediately in front of our house, for electricity substations, telecoms and refuse generated by the commercial. It is further proposed that the refuse generated by the 21no. Apartments will be stored in an area on the plaza facing side of the building and wheeled around to Stone Town Terrace for collection. This means that our street (Stone Town Terrace) will become a collection point/dumping ground for all the refuse generated by the 21 apartments and the ground floor commercial unit/s. There is no detail of in the applicant's documents on collection arrangements and consequently there is a serious risk that refuse bins, domestic and commercial, will be temporarily stored on the footpath or roadway on Stone Town Terrace awaiting and following collection creating a hazard for pedestrians who will have

to walk in the road to avoid it. This is totally unacceptable and any grant of permission must incorporate a condition explicitly setting out that the refuse bins, commercial and domestic, must remain in off-street storage until the arrival of the collection vehicle, and only at that point wheeled around to the waiting vehicle, emptied immediately and then immediately returned to the storage area. In other words, the refuse bins should spend no time whatsoever on the pavement or roadway on Stone Town Terrace. Our second concern in relation to refuse collection is the absence of a designated space for the collection vehicle. The roadway at this point is single lane and there is no safe waiting space for the collection vehicle that does not block the roadway for the duration of the collection which we believe could extend to 4/5 minutes.

3d. The Planning Documents promote the idea of creating a new community. A large percentage of this development is directed at students. Students do not create a community, they are the antithesis of a community as they are transient in nature. Older people have traditionally been at the heart of communities, valued and cherished, and in this model, the existing established and functioning community in Stone Town Terrace is being sacrificed, this wonderful opportunity to create something really amazing for Limerick is being squandered, and future generations will not forgive us.

3e. The O'Callaghan Strand building is promoted as a 4/5 storey building. This is misleading; it is either 4 stories or 5 stories. I suspect that this may be a way of adding an additional storey at a later date with further devastating consequences for neighbours.

3f. While a limited number of photomontages showing before and after views of the proposed development are included in the documentation, no image was provided of the apartment block from Stone Town Terrace. IN the absence of this we commissioned one and it shows the views for our front garden, before and after construction:



South West facing view of our front garden, taken 10:36am on 2nd December 2025 with an impression of the view when the proposed apartment block is completed

#### 4. INADEQUATE PARKING AND TRAFFIC IMPACT

Stone Town Terrace is currently a narrow cul-de-sac serving the 51# Lansdowne Hall apartments, the rear entrances of 4 houses in Rosehill, and 4 houses in Stone Town Terrace only. Outside the 4 houses in Stone Town Terrace there are currently 4 public car parking spaces which serve the existing car parking requirements. The carriageway is only wide enough to accommodate travel in one direction at a time, and is already used by not only residents, but all of the ancillary service vehicles associated with them.

4a. This narrow road is totally unsuitable for a construction entrance as envisaged in the planning application. In order to construct the O'Callaghan Strand apartments as they are misleadingly called, (They are effectively on Stone Town Terrace). It will be necessary to further reduce the carriageway width and take-away the footpath for the full duration of the construction phase. This will also be the case in order to put all the services underground in Stone Town Terrace.

4b. In the "Traffic and Transport Assessment" document prepared by Arup, page 4, 120 of the 145 car parking spaces are being provided for this development on the North Circular Road, and used to give an impression of adequate parking. They are in fact only temporary spaces and will be built on in phase IV of the development.

4c. Page 36 of the Arup document states that car parking spaces for the O'Callaghan Strand zone are provided at the ratio of 1 car parking space for every 3 or 4 apartments, and at the Quarry zone at the ratio of 1 car parking space for every 33 students (EIGHT CAR PARKING SPACES FOR 270 BEDS). The document section 4.4.1 page 36 states; "This is deemed to be reasonable....." when everyone knows this is completely unreasonable and undermines the complete basis of the Parking Strategy.

The 2022 census carried out by the CSO found the following:

24% of students drive to college.

78% of households have at least 1 car.

The average ratio of cars to households is 1.17 cars per household.

Based on these numbers the total number of parking spaces for students should be increased by a factor of at least 10, and for other households by a factor of at least 4.

In O'Callaghan Strand currently we have the Rosehill development, Lansdowne Hall apartments, Strandville Gardens apartments and The Strand apartments, all of which have provided parking in the ratio of cars to households of at least one per household, and this works adequately.

Contrary to some of the claims, this location is not city centre, it is across the river from the city centre and it is a leafy suburban setting without any public transport. A proper transport strategy to replace cars has not been provided, O'Callaghan Strand is not on a current bus route, and it is not possible due to its riverside location to provide a Quality Bus Corridor.

In 2024 Planning Permission was granted by ABP for the Ardhu Development on the same side of Limerick city, on the Ennis Road, (ABP-319721-24). This comprised of a number of blocks of 4/5 storey apartments. There were 167 apartments and 94 car parking spaces, ie a ratio of in excess of 1 parking space per 2 apartments, compared to 1 parking space per 4 apartments approx on the Cleeves development. In addition, the Ardhu development is on a main bus route with a bus stop at the boundary, and within 400 metres of the development the following are available: 2 bars, 2 restaurants, an hotel, 2 doctors surgeries, 2 pharmacies, 2 hairdressers, 1 barber, 1 dry cleaners, 1 flower shop, 2 coffee shops, 2 local shops, 1 tennis club, 1 dentists surgery, 1 butchers shop and 1 beauty salon, and with all of these local amenities within 400 metres they still have a ratio for car parking spaces that is twice what is being offered in the Cleeves development. In Stone Town Terrace we have to walk 800 metres (Except we are unable to walk 800 metres and we are not on a bus route) where we have The Strand Hotel, with a coffee shop on the other side of the busy Ennis Road. The car parking offering on this development is totally inadequate and not aligned with what is being provided by other schemes locally, and should be provided at the ratio of 1 space per dwelling. There are later aspirations to build a pedestrian bridge from O'Callaghan Strand, across the river to the centre of town, obviously in recognition of the very poor amenity offering available to the development. I respectfully suggest that this Planning Application be refused pending the provision of this bridge and other necessary infrastructure.

In Whateley Place in Dublin, as an example, An Bord Pleanála's inspector report for a development (ABP-320724-24) specifically flagged that the scheme would provide only circa 0.9 residents car spaces per apartment and warned that this "will have a negative impact" with likely overspill parking/trespass onto nearby streets.

4d. In the AtkinsRealis-Baseline document pages 10 and 11 the O'Callaghan Strand/ Stone Town Terrace junction is identified as a hazard with the potential for collisions between vehicles and pedestrians and yet it is proposed to use it as a heavy vehicle entrance during the construction phase and one of the two major access/exit points for the entire scheme once completed catering for all existing Stone Town Terrace traffic, new student and resident vehicular access and egress, deliveries of groceries, food, and other Amazon type deliveries, general courier services, taxis, Ubers and the like, Blue Light access, waste collection vehicles and all other service vehicles. This shows a blatant disregard for the safety of the existing residents, many of whom are elderly.

4e. Page 36 of the Traffic/Mobility document section 4.4.1 states "Many trip attractions located within 10-20 mins walk or cycle". This overlooks the fact that we are both elderly and cannot walk for 10-20 mins let alone cycle. Our cars, and our ability to park them in Stone Town Terrace are essential for our well-being and quality of life.

4f. The grand conclusion reached by this Arup document and announced in the final paragraph on page 49 is that "There is no traffic impact as a result of the proposed development and therefore there are no transport-related reasons to hinder the grant of planning by LCCC." The conclusion is ridiculous, and the manipulation of figures in order to reach this conclusion is blatant and flies in the face of the 2022 CSO statistics..

This is plain for everyone to see and if this development is allowed to proceed it will be too late before it is discovered.

## GENERAL

Stone Town Terrace currently enjoys a quiet, small scale residential character. The introduction of a large apartment block will significantly alter this character, eroding the amenity of residents and creating a sense of enclosure and overshadowing inconsistent with the established built environment.

The proposal fails to respect the scale, form and context of surrounding dwellings and would therefore be contrary to the principles of proper planning and sustainable development.

This project is being promoted as a World Class Waterfront development (ref Arup "Traffic and Transport Assessment " document page 6).

This development is not World Class. Over a number of years it has been eroded from a vision to provide something World Class for Limerick, on the most iconic site in the City, to a scramble to provide the maximum number of accommodation units in the space available. This is something akin to the days when Local Authority houses were built in the grounds of King John's Castle and years later were demolished.

This particular building represents approximately 5% of the overall scheme and there are plenty of ways in which these residential units could be accommodated on other parts of the site, thus freeing-up this important location. This site should then be put to a use that raises the stature of Limerick City and brings generational value to the city.

The consultation process leading up to this application, we believe was flawed, in so far as LTT advised us of their plans but did not engage with us. As a group we sent in a submission following the June 2025 presentation, with a number of requests, none of which were adopted, and one of our requests was that they meet us to discuss this application prior to their submission. This was ignored. That is not consultation and it is most certainly not engagement.

Finally, there is a flood risk that is glaringly under represented in the 24 page Arup Flood Risk Assessment (FRA): The hydro-electric scheme at Ardnacrusha gets scant mention on page 11 as follows: "Flooding can also be contributed to by the ESB Power Station at Ardnacrusha". This is the only mention of the ESB, an entity whose first responsibility is energy generation/protecting the dam at Ardnacrusha, and who also control the discharges of water into the River Shannon upstream of Limerick city. At times of prolonged heavy rainfall the water can build up behind the dam and decisions are made by the ESB in respect of the volumes of water to discharge. Factors involved in this decision are safety of the dam, the requirement for electricity generation in the network, potential flooding upstream of the dam, and potential flooding downstream of the dam (in Limerick). The ESB manages this balancing act by dumping large quantities of water into the Shannon, and at times of high tides and strong westerly winds this water cannot get away and the water level on the Shannon rises and flooding occurs. This has

happened a few times over the last number of years and in November 2009 we came dangerously close to a very serious flooding event. This was managed by the ESB and Limerick narrowly escaped in the most part, but water levels in Limerick did rise to dangerously high levels. This happened in Cork city also and on 19/20th November 2009, when the dam in Inniscarra had to be protected, it resulted in all the lower lying areas of Cork City being flooded. The situation in Limerick is different, and the flood plains associated with the Shannon provide a greater buffer but never-the-less there is a serious flood risk that has not had a sufficient evaluation. With climate change comes not only higher temperatures, but also increased severity and frequency of extreme weather events. Again now, on the 21st November 2025, Clare fm put out an article entitled "ESB Warns of Possible Flooding Following Unforeseen Issue at Ardnacrusha Power Station", As this complex situation has not been adequately addressed by the single one line "Flooding can also be contributed to by the ESB Power Station at Ardnacrusha" in the Arup Flood Risk Assessment, I respectfully suggest that this is sufficient reason alone to refuse Planning Permission for this development.

For all of the reasons outlined above, we respectfully request that Planning Permission for this development be REFUSED.

This Planning Application contains so many inaccurate statements and omissions, and draws so many sweeping conclusions that are not supported by the data, that we respectfully suggest that that this planning permission should be refused.

We have attached Addendum #1 to this letter, detailing what we consider to be reasonable conditions to impose on LTT in the event of planning permission being granted, for any part of this proposed development, given the enormous negative impact that it will have on the living environment of the existing residents, Addendum #2 showing the calculations in support of the the claim for non-compliance with the Daylight and Sunlight Guidelines, and Addendum #3 suggesting Solutions.

Thank you in anticipation.

Yours faithfully,

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Roger and Rose O'Brien

## ADDENDUM NUMBER 1: ISSUES OF SIGNIFICANT CONCERN

Following the Consultation Meeting on Wednesday 4th June 2025, we made a submission as part of a Residents group to Limerick 2030 (LTT) requesting their co-operation on a number of items that we would need in the event of this project going to construction. We did not receive any information on their willingness to address our concerns, and we would respectfully ask you to include the following as conditions attached to any planning any part of the proposed development.

**NOISE:** Noise during construction is a major issue for the existing neighbours of this development. The Atkins Realis report "Outline Construction Environment Management Plan", section 2.6.1 page 37, talks about the existing situation being one of suburban in nature with road traffic and a mix of typical suburban (sic) from pedestrians, schools (from which we are not affected), and residential areas. It then goes on to say that we will be subjected to construction noise from plant and machinery over the course of the construction phase and quotes BS 5228 parts 1 and 2 (BSI 2014) for the assessment of noise and vibration from construction and demolition activities.

At 23 metres from our house to the site boundary the Atkins Realis report indicates that noise levels at nearby dwellings could rise from a current average of around 39 dB to approximately 79 dB during daytime construction periods. Since dB measurements are not linear but logarithmic, this represents an extremely large increase-more than a 16 fold rise in perceived loudness-and would have a severe effect on our residential amenity, comfort and wellbeing.

As a retired person who spends a lot of time in my home I am deeply concerned that such a noise would make normal daily life intolerable. Excessive predicted construction noise of 79 dB is above the recognised environmental and planning guidance levels for residential areas (Which is generally 55-65 dB LAeq daytime) by a factor of 4.

The potential for long-term disturbance, given the scale of the development, proximity to existing homes and its duration is enormous, both inside and outside the homes: from SLEEP DISTURBANCE if it is early or late, to STRESS, FATIGUE, ANNOYANCE and HEARING STRAIN. The noise mitigation steps outlined are inadequate to reduce noise levels to guidance levels and I respectfully ask you for the sake of our HEALTH and WELLBEING to REFUSE permission for this development as constituted.

In the event that planning permission is granted, my suggestion for some noise reduction is to move the Stone Town Terrace Block from conventional Piling and adopt

an alternate method such as Pressed-in (Silent) Piling, CFA (Continuous Flight Auger)/ Cast-in-Place Auger Piles, Bored (Rotary) Pile Shafts with Casing/Slurry etc. This would have a positive impact on noise reduction, vibration and potential damage to our properties during this phase of the work.

**DUST AND AIR QUALITY:** It is inevitable that a project of this type and size will, if unchecked, generate large amounts of dust and that this will have a negative impact on air quality. We request that a Construction Dust Management and Abatement Plan, and an ongoing Air Quality Monitoring Plan be implemented both of which are policed during the demolition and construction phases.

**FLOODLIGHTING:** That as a condition, LTT adhere to a plan detailing the use of floodlighting and the steps that they will take to avoid light pollution.

**ROAD CLEANING:** That LTT adhere to a Road Cleaning Plan detailing the obligation of contractors to ensure regular road washing, sweeping and vehicle washing during the entire life of the project. For roads we suggest a minimum of three times a week, and more frequently during periods of high or particularly dirty activity.

**SITE WORKING HOURS:** We request that site working hours are limited to Monday - Friday 08.00 to 18.00 and Saturdays 10.00 to 14.00 WITHOUT EXCEPTION.

**WATER PRESSURE:** Currently residents enjoy strong water pressure. We would ask that this is measured at each residence before the commencement of any work and again upon completion of each element of the work, or in the event of a concern by any of the current residents. If any deterioration is evident this is to be rectified by LTT.

**STORAGE:** We request that a condition be placed on LTT that Stone Town Terrace as it is currently constituted not be used as a store or parking place for construction materials, waste materials, construction equipment, vehicles or anything else for the duration of the project. This obligation should be enshrined in all contracts to developers, construction companies, sub-contractors and employees.

**PARKING:** Parking in Stone Town Terrace is on-street parking, as levels do not permit the provision of off-street parking, and this is extremely limited. There are 4 houses and 4 parking spaces for public use. This is just about adequate, but given the extra pressure on parking spaces both during construction and after, we would be pleased if you could use your good offices to have these spaces designated for the sole use of the existing residents of 1-6 Stone Town Terrace. Some of these residents are in their 70's and 80's, they cannot walk any distance nor cycle and will have serious challenges if they cannot park in close proximity to their homes. Furthermore, it is unreasonable to put long standing residents into direct competition for parking with hundreds of new residents and 270+ students. Having a reasonable expectation of availability of nearby

parking is a significant amenity which we currently and it is unacceptable and injurious that this is effectively removed without consideration and provision of some alternative.

**PEDESTRIANS:** The footpath on the western side of Stone Town Terrace is in regular use by the residents of both Stone Town Terrace and the Lansdowne Hall apartments. Given the absence of parking in the area, and the narrow width of the road, coupled with increased traffic volumes, we are concerned that there is a serious risk of “pavement parking”, forcing pedestrians to walk in the road. As a condition of planning will you please request that this footpath is protected to its full extent by permanent durable bollards.

**ENTRANCE/EXIT FROM THE PLAZA TO STONE TOWN TERRACE:** this entrance/exit is to be made in a fine stone wall which has great character and we would respectfully suggest that this wall be retained and traffic be routed elsewhere. Failing this traffic through the wall should be restricted to pedestrians and cyclists only in order to preserve the current quiet streetscape.

**RODENTS, VERMIN AND PESTS:** It is inevitable that demolition, clearance and construction activities will result in the widespread displacement of rodents. We would request that prior to any site activity, a Rodent Mitigation Plan be prepared and executed.

**ASBESTOS AND TOXIC WASTE:** This site contains considerable quantities of asbestos and other toxic substances. In addition to a Method Statement and Materials Handling Plan identifying these substances, we request that any proposed movement or disturbance of these substances is to be notified to the residents at least a week in advance, together with details of all risk mitigation measures.

**DRILLING and PILING :** In the event that you grant Planning Permission for parts of the site to use deep drilling and piling, a Mitigation Plan formulated to minimise these activities and restrict them to the working hours previously mentioned should be adopted. A pre-construction survey of every property in the area should be carried out, at the expense of LTT, documenting its present condition to establish a baseline for comparison during and after construction. Any deterioration to neighbouring properties should be rectified at the expense of LTT.

**CRANES:** It is likely that tower or other cranes will be used during construction. We respectfully request that you impose a condition prohibiting the use of a crane in any position that could possibly result in a jib, mast, counterweight, trolley or any other part of a crane from dropping outside the boundary of the site, even during catastrophic failure or collapse.

**SECURITY:** We request that 24/7 security be provided to the site and its perimeter for the duration of the works to discourage criminal activity in the area.

**EMERGENCY SERVICES ACCESS:** We ask that responsibility for ensuring that Stone Town Terrace remains fully accessible to the emergency services and all utilities (including refuse collection) be given to a designated officer/appointee of LTT who is available to the current residents in the event of concerns.

**CONTACT:** we would request that a senior management representative of LTT is nominated as a point of contact for the current residents for the duration of the works from grant of planning, if planning is granted, to completion of site activities. Contact details including mobile phone number and email address should be provided to the residents representatives.

## ADDENDUM NUMBER 2: SUNLIGHT CALCULATIONS

The BRE Guide (3rd Edition) in section 3.3.17 states “It is recommended for it to appear adequately sunlit throughout the year, at least half of a garden or amenity area should receive at least two hours of sunlight on 21st March. If as a result of new development an existing garden or amenity area does not meet the above, and the area that can receive two hours of sun on 21st March is less than 0.8 times its former value, then the loss of sunlight is likely to be noticeable. If a detailed calculation cannot be carried out, it is recommended that the centre should receive at least two hours of sunlight on the 21st March”.

The calculation has been carried out as follows and the results confirm that the new building known as the O’Callaghan Strand Block is non-compliant.

The basis of the calculations are:

1. In Limerick on 21st March the sun rises at 06.34, solar noon is 12.34, and sets at 18.49. The duration of the day is 12.25 hours.
2. The angle of inclination from the centre point of my garden to the top of the O’Callaghan Strand Block is 41 degrees.
3. The building is situated starting at 180 degrees azimuth and any time the sun is at 180 degrees azimuth or more and is below 41 degrees, we are in shade.
4. The sun rises in the east at 06.34 and appears over our 1.65m boundary at 120 degrees azimuth to the centre of our garden at 10.15.
5. At 12.50 the sun is at 37.3 degrees (below the building height of 41 degrees), at 180 degrees azimuth and our garden is in shade for the remainder of the day.
6. The long term average for sunlight in Limerick on the 21st March is 4.9 hours per day (Met Eireann). That is 4.9 hours over a 12.25 hour day, equating to 40% of the potential available sunlight.
7. From 10.15 when the sun is high enough to hit the centre point of our garden, to 12.50 when it will disappear behind the proposed new building, we have a window of 2 hours and 35 mins (2.6 hours), but the sun only shines for 40% of the time (Met Eireann), and 40% of 2.6 hours is only 1.15 hours. Far below the recommended value of 2 hours.
8. The Guidelines also recommend that taller buildings should be located to the north of smaller buildings which clearly is not the case here.
9. This building is in clear breach of the guidelines for over-shadowing.

## ADDENDUM NUMBER 3: SOLUTIONS

### 1.SUNLIGHT/DAYLIGHT:

1a. Reduce the height of the O'Callaghan Strand building by 2 floors. The parking spaces are not fit for purpose and could be used to accommodate the noise emitting plant. The height would then align more closely with the Dairy Building next to it rather than the Flaxmill building which should be the dominant building. Adequate parking should then be provided on the site.

OR

1b. Move the O'Callaghan Strand building back from the stone wall on Stone Town Terrace by a distance of say 20 metres and provide proper parking and refuse facilities inside the wall. Since the stone wall has been removed from the protected structure list, and if the preference were to keep it as a part of the O'Callaghan Strand apartment block, it too could be relocated giving greater width to Stone Town Terrace and alleviating some of the problems associated with the narrow width of Stone Town Terrace, ie traffic congestion, illegal parking, refuse collection, public safety etc. and provide parking for the apartment block residents in the extra space created outside of the wall.

### 2. LOSS OF PRIVACY AND OVERLOOKING

2a. The sunlight, operating noise, privacy and overlooking issues would be accommodated in both the 1a and 1b solutions above.

### 3. LOSS OF RESIDENTIAL AMENITY/OVERBEARING CHARACTER.

3a. By placing the plant associated with the O'Callaghan Strand building in the undercroft, the perceived operating noise would be greatly reduced

3b. If the stone wall on Stone Town Terrace was moved back say 20 metres, or even removed from the development it would allow space to properly plan some adequate parking and refuse disposal facilities, ie. a lay-by or similar for refuse trucks, significantly improving public safety .

### 4. PARKING.

4a. Parking spaces are grossly under provided for: I have already provided information from the 2022 census from the CSO which states that 24% of students drive to college and the average number of cars per household is in excess of one. I have also cited the comments where An Bord Pleanála's inspectors raised concerns that at circa 0.9, the car parking spaces in Whately Place, Dublin (ABP-320724-24) "will have a negative impact" with likely overspill parking/trespass onto nearby streets. This does illustrate

that the planning process formally recognises that very low parking ratios can create practical problems.

## 5. GENERAL.

5a. We are not anti-project. We fully recognise that this site is in need of development for the good of the entire city of Limerick. It started off being promoted as a world class development on an iconic site, a wonderful opportunity to enhance the cultural, civic, social, and residential offering of Limerick. Unfortunately the cultural, civic and social elements have now been stripped out and we are left with residential only. These residential units have been packed in tightly to maximise the number of dwellings without thought to the way people are going to live in them. There is hardly any parking, no buses, no local shop, no supermarket, no pubs, no restaurants, no cinemas and they are demolishing an existing sports hall. This is being promoted as creating a community, but there is nothing for people to coalesce around. With the density of accommodation, totally inadequate parking, and no facilities, we are creating stress, a community at loggerheads rather than a happy harmonious community. It is right that this site should be developed but good sense needs to prevail and the number of units should be reduced and adequate car parking provided, at least then we can talk about making this development world class again, and not just a breeding ground for social problems.