

Our Case Number: ACP-323849-25



An
Coimisiún
Pleanála

Shane Larkin
Blaithín
Clanmaurice Avenue
North Circular Road
Limerick
V94 K6HY

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
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	communications@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

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

1. Introduction and Standing to Make This Observation

I, the undersigned residents at the above address, 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.

Name: Shane Larkin

Address:

Blaithin,
Clanmaurice Avenue,
North Circular Road,
Limerick
V94K6HY

Date: 19 Dec 2025

Shane Larkin

Shane Larkin