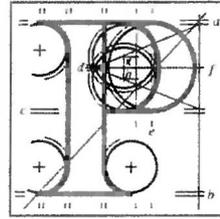


Our Case Number: ACP-323849-25



**An
Coimisiún
Pleanála**

The Fernhill Development Association
c/o Donna Maher
No. 14 Fernhill
North Circular Road
Limerick
Co. Limerick

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,

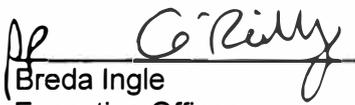
An Coimisiún Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

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 (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

To:
An Coimisiún Pleanála
64 Marlborough Street
Dublin
D01 V902

Limerick City Council in Partnership with
Limerick Twenty Thirty Strategic
Development DAC
Planning Department,
Merchants Quay,
Limerick City
Co. Limerick

Date: 22Dec2025

Re: Planning Application Reference: An Coimisiún Pleanála - Case reference: JA91.323849.

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,

On behalf of the Fernhill Residents, I am writing to formally object to the above-mentioned planning application (phase II). Our association represents numerous households in the Fernhill Residential Estate directly opposite and adjoining the Cleeves site on the North Circular Road, and we have significant concerns regarding the proposed development.

While we acknowledge the need for development and are not opposed to the principle of redevelopment, we have significant concerns with this proposal. We believe that this application contravenes several aspects of Irish planning laws and guidelines, including but not limited to the Planning and Development Act 2000, Limerick Development Plan 2022-2028 and the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (2009). We believe that the proposed development both during development and long term use will have severe adverse effect residential amenity of the Fernhill estate, changing its unique and desirable character forever. Below, we outline the key grounds for our objection, supported by references to relevant legislation and guidelines, as well as precedents from similar planning cases.

Grounds for Objection

1. Impact on Residential Amenity and Cultural Identity

The scale and design of the development will negatively impact the Fernhill residential amenity of existing homes, contravening Section 34(2) of the Planning and Development Act 2000, which requires planning authorities to consider the proper planning and sustainable development of the area. Key concerns include:

- Cultural Impact:** The development threatens to erase the area's unique identity. Fernhill is known throughout Limerick as a unique and quiet residential area next to the Historic

landmarks of the Cleeves site. The development will erase historically classified convent and our quiet residential atmosphere with children playing on the greens and our beautiful views of the historical industrial chimney landmark.

- II. **Overshadowing and Loss of Light:** The height and massing of the buildings on already significantly raised land will overshadow out existing homes, reducing access to natural light and impacting the efficiency of present/future Solar and photovoltaic panels. The sunlight survey is specific to phase II of the proposed development only and has not considered impact on Fernhill residents roofs or Fernhill visibility of sunrise/sunset. The survey conclusion contradicts overshadowing of Fernhills North-East and East-South sun year-round. This is clearly visible at location and through sun calculation tools.
- III. **Noise and Disturbance:** The significant increase in population (both residential and public), foot traffic, road traffic and construction activity will disrupt the safeness and quiet residential character of the area.
- IV. **Loss of Privacy:** Overlooking from high-rise buildings in this low-density residential areas will compromise the privacy of our residence.

Precedent: A similar proposal was refused due to excessively overshadowing of and overbearing impact on residential development in the vicinity (Case 24/60278 Penny Pudding Limited multi-storey hotel in Kilkenny city)

2. Traffic and Parking Concerns

The proposed development fails to comply with the Traffic and Transport Assessment Guidelines (2014) and the parking standards outlined in the by the Limerick Development Plan 2022-2028.

- I. The proposed traffic management plan channels and filters all traffic onto an already congested and undersized roundabout outside the Salesians school, with no consideration for proximity of entry, its capacity to handle increased demand. The area has already become significantly more congested over recent years following the receipt of traffic from 3 schools, the elimination of no right turn onto the Condell road and the reduction of lanes onto the Shannon bridge.
- II. The Traffic Impact Assessment is unrealistic with a major assumption that the public , majority of residents and their guests (234 residential units and 270 student accommodations) will not own cars. This is an unrealistic expectation in Irish culture and weather. This assumption invalidates the assessment.
- III. There is no realistic impact assessment and action plan for the reduction in the removal of existing car parking spaces. The proposal will eliminate over 120 public carparking spaces in the area.

- IV. There is no commitment in the design to prevent the public, construction workers and residence from owning cars or prevent undesirable and unsafe parking on road and footpaths on the within the new development, on the north circular road and Fernhill residential estate (open access). Fernhill residents are concerned of spillover parking in our adjacent cul-de-sac, unsafe parking on the roads and blocked entry.

Precedent: Case [WEB2757/25](#) Dublin City Council has refused planning permission 38-unit on the grounds the scheme would give rise to unacceptable levels of overspill vehicular activity that could endanger public safety by reason of a traffic hazard and obstruction of pedestrians, cyclists and other road users.

3. Overdevelopment of the Site

The proposed residential density exceeds the recommendations exceeds the residential allowance of Limerick Development Plan 2022-2028 Settlement Capacity Audit which concludes the number of units achievable over the lifetime of the plan for Cleeves in 250. It also exceeds the density outlined in the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (2009). specifically Chapter 5 which emphasizes that developments should respect the character of the surrounding community and avoid overdevelopment. This area contains a unique quaint residential area of 28 off road houses in a quiet cul-de-sac and 2 on road houses at cleaves.

- I. The proposal prioritizes excessive 1-2 bedroom units (475 in total) which risks oversaturation of a single and student housing types and fails to provide a balanced mix of housing to meet community needs. We have concern of the plan overstepping mixed-use zoning limits by prioritizing car free 1 bed residential and student accommodation will negatively impact the area
- II. The removal of a sports hall used and inclusion of private playgrounds for apartment blocks of 1-bedroom units raises questions about the practicality and appropriateness of the design.

4. Inadequate Public Consultation

The consultation process conducted by the applicant was poorly organized and failed to meet the standards of public engagement required under Section 247 of the Planning and Development Act 2000. This failure to conduct meaningful consultation undermines the legitimacy of the application. Key issues include:

- I. **Lack of Transparency:** Significant changes to the development plans were made between consultation phases without explanation. The phased approach was not clearly advertised which includes changes in building heights. This has residents uninformed about the true scope of the project.

- II. **Ineffective Communication:** There has been no effort for direct engagement with the residence. Notices were distributed poorly via unchecked letterboxes with insufficient notice periods and inflexible consultation events which breaches principles of inclusive engagement. Questions and concerns raised by the residents via email and during events were not documented, followed up nor addressed during the meetings. These issues highlight a failure to conduct an inclusive, transparent, and effective consultation process, leaving local residents feeling excluded and disregarded in the planning of their own community.
- III. **Exclusion of Local Representation:** The absence of local councillors or community representatives on the 2030 board raises concerns about a lack of understanding of the community's needs.

5. Environmental Impact

We at Fernhill are grateful to know flood defences will be established at the site however further assurances of the impact of the defences are required as we are in a unique situation being so close to a flood zone. The application does not adequately address the potential environmental impacts, contravening the Flood Risk Management Guidelines for Planning Authorities (2009) and the 4th national biodiversity action plan

- I. **Flooding/Drainage :** There is insufficient detail on the impact and/or management of surface water and floor zone impact on Fernhill from the development such as raising ground levels of the Cleeves site and North Circular Road. This will cause a Sump effect for Fernhill, we have great concern that modifications, additional housing, increased runoff, inadequate draining, will impact Fernhill.
- II. **Noise, ground disturbance and air pollution** from the development phase and long-term application will harm the local environment inclusive of Fernhill residents well-being, foundations of Fernhill, local biodiversity in the wetlands and protected bat species.

Conclusion:

In light of the above concerns, we respectfully request that the planning authority refuse permission for this development in its current form as it will have a detrimental impact on the Fernhill community. We request that the above concerns are considered and mitigated ahead of any further planning request. We are happy to provide further information or discuss our concerns in more detail if required. Please acknowledge receipt of this objection and keep us informed of any updates regarding this application.

Yours faithfully,

Donna Maher (no.14 Fernhill) and The Fernhill Residents

Contact information: The Fernhill Development Association, (no.14) Fernhill, North Circular Road, Limerick City, Co. Limerick, Email: fernhillresidences@gmail.com