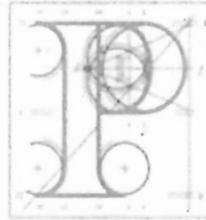


Our Case Number: ACP-323849-25



**An
Coimisiún
Pleanála**

Willie Ryan and Aideen Ryan
Armoury
Clanmaurice Avenue
North Circular Road
Limerick
V94 C7WE

Date: 14 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 Inggle
Executive Officer
Direct Line: 01-8737291

JA02

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Formal Objection

Date: December 2nd 2025

Proposed Development: Cleeves Riverside Quarter / Cleeves Riverside Campus

Applicant: Limerick Twenty Thirty DAC

Site Location: Former Cleeves Factory Site, North Circular Road, Limerick

Planning Ref: Case reference: JA91.323849

Objectors

Names: Willie Ryan and Aideen Ryan

Address: Armoury, Clanmaurice Avenue, North Circular Road, Limerick, V94 C7WE

Occupancy: Owners and full-time residents

Email: williamryanbl@gmail.com

Professional Background:

- Willie Ryan is a practising Barrister and music manager.
- Aideen Ryan is a Partner at EY, based in Limerick and Dublin.

1. Introduction and Status of This Submission

We, the undersigned residents and owners of a dwelling at the above address, submit this updated objection under the Planning and Development Act 2000 (as amended) and associated Regulations.

Our home directly adjoins the proposed development site and will be materially and permanently impacted by its scale, layout, construction phase and long-term operation.

We previously lodged an objection/observation dated 17 June 2025 (see also attached as Schedule A) in respect of earlier “Vision” and masterplan material published by Limerick Twenty Thirty DAC for the Cleeves site. This present submission is:

1. **An updated objection** in light of the applicant’s October 2025 public statements and material, including:
 - the public announcement on 21 October 2025 of the Cleeves Riverside Quarter plans;
 - updates to the “Cleeves Riverside Campus / Riverside Quarter” project pages on limerick2030.ie; and
 - the applicant’s stated intention to lodge, and subsequent lodging of, a planning application for Phase Two (residential, student accommodation and public realm) in late October 2025.
2. **A supplement to our original objection**, which we ask the Planning Authority and/or An Bord Pleanála to read together with this updated submission.

We have a direct and significant material interest in the outcome of this application. Our right to object as affected parties is recognised under Irish planning law. It remains our considered view that the application is contrary to proper planning and sustainable development and should be refused or, at a minimum, substantially revised.

2. Updated Context: October 2025 Announcements

From the applicant's own material (October 2025):

- The Cleeves project is described as a €400m+ “landmark” regeneration scheme and “the largest inner-city project ever undertaken in Limerick”.
- Phase Two comprises approximately:
 - 234 residential units
 - 270 student-bedrooms
 - c. 299 m² of commercial space
 - crèche facilities
 - c. 2 acres of public realm (including “Reservoir/Quarry Park”, “Flaxmill Square” and the “Riverside Corridor”)
- The applicant emphasises appointment of a contractor for heritage works at the Flaxmill (Phase One) and outlines an indicative multi-year programme subject to funding and market demand.
- The site is promoted as a mixed-use city-centre regeneration area with significant employment, educational and cultural potential.

We welcome, in principle, well-designed regeneration of the Cleeves site. However, the scale, massing and configuration of the current proposal – particularly the Phase Two residential and student blocks located immediately behind our home – raise profound concerns that have not been addressed adequately in the material released to date.

3. Grounds of Objection (Updated)

A. Overshadowing and Loss of Daylight – Breach of Statutory and Best Practice Standards

The proposed 5–7 storey buildings behind Clanmaurice Avenue remain directly positioned behind our home. There is still no publicly available BRE-compliant Daylight and Sunlight Assessment or verified shadow analysis assessing impacts on our property.

This is contrary to:

- Objectives **CGR O3** and **CGR O9** of the Limerick Development Plan 2022–2028
- **Urban Development and Building Height Guidelines (2018)** – requiring that developments do not unduly overshadow
- **BRE 209** (“Site Layout Planning for Daylight and Sunlight”) and **BS82 06-2**

Irish case law confirms that granting permission without proper daylight/sunlight assessment is unlawful:

- *Clarke v An Bord Pleanála* [2019] IEHC 838
- *Sweetman v An Bord Pleanála* [2007] IEHC 153

Given the confirmed density (234 homes and 270 student-bedrooms), the risk of material overshadowing is significant.

Relief Sought – Daylight / Sunlight

1. Application should be deemed invalid unless accompanied by independent BRE/BS-compliant daylight/sunlight reports.
2. Any lodged reports must be rigorously assessed, with required design amendments where material losses are shown.
3. No permission should issue absent verifiable modelling demonstrating acceptable daylight/sunlight levels for existing homes.

B. Overlooking and Invasion of Privacy – Insufficient Sections and Mitigation

The October 2025 material indicates no changes to the proximity of buildings to our rear boundary. No cross-sections, window/balcony maps or mitigation measures have been provided.

Failure to assess overlooking is unlawful:

- *Fitzpatrick v An Bord Pleanála* [2022] IEHC 296
- *Tristor Ltd v An Bord Pleanála* [2010] IEHC 397

Relief Sought – Privacy / Overlooking

No permission should be granted without:

- Scaled cross-sections
- Window and balcony maps
- Finished floor levels
- Sightline diagrams

Where <22m separation exists, conditions should require:

- Obscure glazing
- Angled louvres/privacy fins
- Robust landscaping at the boundary

C. Overdevelopment and Excessive Massing – Failure to Respect Residential Context

The interface with Clanmaurice Avenue is residential. The combination of 234 units, 270 student-beds, and 5–7 storey blocks constitutes over-intensification.

Contrary to:

- **Objectives CGR O3 and CGR O6** (protect residential amenity; ensure appropriate scale)
- *ABP-308759-20 (Cherrywood)* – refusal due to failure to integrate massing with existing housing

Relief Sought – Height and Massing

All buildings within 30m of Clanmaurice Avenue should:

- be capped at 3 storeys, and
- have higher elements significantly stepped back.

D. Traffic, Construction and Access – Local Infrastructure and Safety at Risk

Phase Two will generate major construction and operational traffic. The NCR and adjoining roads are already constrained, especially during school peaks.

The material lacks detail on:

- Construction traffic routing
- HGV restrictions
- Bin truck access
- Student drop-off/pick-up
- Pedestrian/cyclist safety

ABP has refused schemes on such grounds:

- *ABP-306931-20 (Cabra)*

Relief Sought – Traffic & Construction

1. Full TTIA (operational + construction phases)
2. CTMP lodged **before** decision
3. Prohibition on construction/operational access via Clanmaurice Avenue (except emergency access)

E. Prematurity, Phasing and Deliverability – Risk of Piecemeal or Incomplete Development

No binding:

- construction contract
- full funding
- operator for student units
- enforceable phasing/delivery plan

As per:

- *Killross Properties v ESB* [2016] IEHC 9
- *Morrissey v ABP* [2022] IEHC 242

planning must be based on realistic implementation.

Relief Sought – Prematurity

Under s.34(4)(b):

- Identify partner/operator
- Demonstrate funding
- Provide enforceable phasing programme

F. Environmental, Flood and Biodiversity Impacts – Inadequate Disclosure

The site lies on the Shannon floodplain, near European sites, and includes mature trees/habitats.

No clear EIAR or NIS is exhibited.

As per:

- *Kelly v ABP* [2022] IEHC 215
- *People Over Wind v Coillte* (C-323/17)

mitigation cannot be used at screening stage.

Relief Sought – EIA / NIS

1. Application invalid unless EIAR/NIS lodged
2. Full public exhibition
3. Decision only after full scrutiny

G. Failure to Preserve Fernbank House – Loss of Architectural and Social Heritage

Fernbank House is a mid-19th century NCR villa, historically linked to the Cleeve family and Salesian Sisters (1924–present), with intact original features.

The applicant acknowledges its importance but provides no conservation plan.

Contrary to:

- **Objectives BHA O1, O4, O6**
- Architectural Heritage Protection Guidelines (2011)
- *Balz v ABP* [2019] IESC 90

Relief Sought – Fernbank House

1. Full Conservation Report
2. No demolition/alteration without evidence-based justification
3. Retention and adaptive reuse
4. Refusal if no credible conservation plan

H. Traffic, Road Safety and Network Capacity – Unassessed and High-Risk

1. **Traffic Flow and Congestion:**
Data excludes JFK Primary School; ignores crèche, church, two hospitals; and overlooks daily NCR gridlock.
2. **Safety Concerns:**
No mitigation for pedestrians/cyclists in school zone.
ABP refusals: *ABP-302848-18 (Dundrum)*, *ABP-306931-20 (Cabra)*.
3. **Access and Emergency Vehicles:**
Long-standing access blockages on Clanmaurice Avenue; no credible mitigation plan.
4. **Insufficient Consultation:**
Community afforded no meaningful engagement; strategy speculative and reliant on undelivered 2040 mobility assumptions (*Killross, Morrissey*).
5. **Personal Experience (nearly 10 years):**
Chronic blockages, buses unable to turn, waste trucks/ambulances unable to enter, overspill parking, unmanaged congestion.

Relief Sought – Traffic & Access

1. Full TTIA with peak modelling
2. Stage 1/2 Road Safety Audit
3. CTMP pre-decision
4. Ban on access via Clanmaurice Avenue
5. Mitigation for schools, pedestrians, vulnerable users
6. Revised evidence-based strategy

4. Conclusion and Relief Sought

We respectfully submit the proposal should be refused because:

1. It is premature and inadequately evidenced for a €400m+ scheme.
2. It would materially injure residential amenity (height, massing, overshadowing, overlooking).
3. It lacks essential assessments (daylight, privacy, traffic, flood, EIAR/NIS).
4. It fails to provide heritage-led regeneration or respect the existing residential interface.

Specific Relief Requested

1. Formal finding of prematurity under s.34(4)(b).
2. Full refusal as materially contravening the Development Plan.

Alternatively (if granted):

1. Height cap of 3 storeys within 30m of Clanmaurice Avenue.
2. Mandatory daylight, privacy and traffic assessments.
3. Prohibition on construction/operational access via Clanmaurice Avenue.
4. Full public EIAR/NIS exhibition.
5. Proof of partner, funding and enforceable phasing.

5. Summary

We support regeneration of the Cleeves site, but the current proposal is over-intensive, insufficiently justified, and incompatible with the scale and character of the Clanmaurice Avenue neighbourhood.

A balanced approach requires:

- Sensitive heritage reuse,
- High-quality public realm,
- Moderately-scaled residential development.

The current application fails to meet these standards and should be refused or substantially redesigned.

Yours faithfully,

Willie Ryan, BL

Aideen Ryan, Partner EY

Armoury, Clanmaurice Avenue

North Circular Road

Limerick, V94 C7WE

Email: williamryanbl@gmail.com

Date: December 2nd 2025

Schedule A (June 2025 Observation sent to Applicant via email to info@limerick2030.ie)

Proposed Development: Cleeves Riverside Quarter objection/observation

William Ryan BL <williamryanbl@gmail.com>

Tue 17 Jun,
23:44

to info@limerick2030.ie

Formal Objection: Dated 17th June 2025

Proposed Development: Cleeves Riverside Quarter

Applicant: Limerick Twenty Thirty DAC (info@limerick2030.ie)

Site Location: Former Cleeves Factory Site, North Circular Road, Limerick

Objectors

Names: Willie Ryan and Aideen Ryan

Address: Armoury, Clanmaurice Avenue, North Circular Road, Limerick, V94 C7WE

Occupancy: Owners and full-time residents

Email: williamryanbl@gmail.com

Professional Background:

- Willie Ryan is a practising **Barrister** and **music manager**.
- Aideen Ryan is a **Partner at EY**, based in Limerick and Dublin.

1. Introduction

We, the undersigned residents and owners of a dwelling at the above address, submit this objection under the **Planning and Development Act 2000 (as amended)** and associated Regulations. Our home directly adjoins the proposed development and will be materially impacted by its scale, layout, construction phase, and long-term operation.

We have a direct material interest in the outcome of this application, and our right to object is recognised under Irish planning law as affected parties. We are firmly of the view that the application is contrary to proper planning and sustainable development and must be refused or substantially revised.

2. Grounds of Objection

A. Overshadowing and Loss of Daylight – Breach of Statutory and Best Practice Standards

The proposed 5–7 storey buildings to the rear of Clanmaurice Avenue are located directly behind our home. The Vision Document contains no **Daylight and Sunlight Assessment** or verified shadow analysis — a critical omission.

This breaches:

- **Objective CGR03 and CGR 09** of the **Limerick Development Plan (2022–2028)**
- **Urban Development and Building Height Guidelines (2018)**, which require that developments do not “unduly overshadow or overlook neighbouring properties”
- **BRE 209 Guidelines** (Site Layout Planning for Daylight and Sunlight), the accepted best practice standard under Irish planning law

In *Clarke v An Bord Pleanála* [2019] IEHC 838, the High Court held that permission granted in the absence of shadow analysis was irrational and unlawful. Similarly, in *Sweetman v An Bord Pleanála* [2007] IEHC 153, any interference with sunlight must be justified by proportionate and detailed reasoning.

We note that the applicant has not submitted any BRE 209 or BS 8206-2 analysis, nor any 3D modelling to verify compliance with standard daylight access thresholds, despite the proposed proximity and height of structures directly behind our property.

Relief Sought: Any application must be accompanied by **BRE-compliant**

Sunlight/Daylight Reports demonstrating compliance with access-to-light criteria for our rear garden and living spaces. No application and/or planning decision should be made in their absence.

B. Overlooking and Invasion of Privacy – Failure to Provide Screening or Cross-Sections

The proximity of the proposed 5–7 storey buildings to our rear boundary raises serious concerns regarding **overlooking into habitable rooms and rear gardens**. No cross-sections, window maps, or privacy mitigation measures are provided.

In *Fitzpatrick v An Bord Pleanála* [2022] IEHC 296, the High Court held that a failure to assess impacts on privacy and overlooking invalidated the planning process. In *Tristor Ltd. v An Bord Pleanála* [2010] IEHC 397, it was confirmed that cumulative amenity impacts must be comprehensively assessed.

Relief Sought:

No application and/or planning permission should be granted without detailed cross-sections showing:

- Distance between windows/balconies and our boundary
- Finished floor levels
- Sightlines into habitable rooms or garden space

If these show proximity closer than 22 metres, **obscure glazing, angled louvres, or landscaped screening** must be required as conditions of any grant of permission.

C. Overdevelopment and Massing – Lack of Compatibility with Established Context

The proposed height, density, and massing are **significantly out of scale with our established residential neighbourhood**. While the site is zoned for mixed-use regeneration, the interface with Clanmaurice Avenue remains sensitive and residential in nature.

This element breaches:

- **Objective CGR O3 and CGR O6 of the Limerick Development Plan**, which require that regeneration sites respect and enhance existing residential amenity.

In *ABP-308759-20* (Cherrywood), An Bord Pleanála refused permission due to excessive massing and failure to integrate with nearby housing. The Board confirmed that proximity to city centres does not excuse poor integration or the erosion of residential character.

Relief Sought: All buildings within **30 metres of Clanmaurice Avenue** should be limited to a **maximum of 3 storeys**, with upper levels set back to avoid visual overbearance.

D. Traffic, Construction, and Access – Undermining Local Infrastructure and Safety

The narrow road network of Clanmaurice Avenue and North Circular Road is already constrained and under pressure, particularly at school and commuter peak times.

The proposal fails to provide any enforceable plan or binding conditions in respect of:

- Construction traffic routing
- Bin truck and waste access
- Student drop-offs and deliveries
- Pedestrian and cyclist safety during construction

In *ABP-306931-20* (Cabra), permission was refused due to unresolved traffic access and safety issues in a constrained residential context.

Relief Sought:

- A full **Construction and Traffic Management Plan** must be submitted prior to any application and/or grant.
- All construction and vehicular access must be **prohibited via Clanmaurice Avenue** by condition.
- A formal **Traffic and Transport Impact Assessment (TTIA)** must be required to model increased demand from student accommodation and commercial use.

E. Prematurity – No Committed Developer, Contractor, or Phasing Detail

The development is **speculative and premature**, with no evidence of:

- A committed private development partner
- A secured construction contractor or public procurement
- A timeline or phasing schedule for the delivery of homes, offices, or educational components

This raises serious risk of **piecemeal, disrupted, or partially delivered development**, particularly given the scale and sensitivity of the site.

In *Killross Properties Ltd v ESB* [2016] IEHC 9, the High Court noted that planning decisions must assess the **real likelihood of implementation**, not merely aspirational frameworks. Similarly, in *Morrissey v An Bord Pleanála* [2022] IEHC 242, the Court affirmed that large-scale developments must be properly phased, budgeted, and deliverable. The Vision Document itself acknowledges that **public consultation to date has been non-statutory**, and that **Phase 1 is not fully funded** beyond initial URDF contributions.

Relief Sought: The application is premature under **Section 34(4)(b)** of the Planning and Development Act 2000. No application and/or permission should be granted until a **named developer, binding delivery schedule, and tendered works contract** are confirmed.

F. Failure to Disclose Environmental, Flood, and Biodiversity Impacts

The site lies on the **Shannon floodplain**, near a **Special Area of Conservation (SAC)**, and contains mature trees and habitat used by protected species. Yet no **Environmental Impact Assessment (EIA)** or **Natura Impact Statement (NIS)** has been exhibited or publicly consulted on.

In *Kelly v An Bord Pleanála* [2022] IEHC 215*, permission was overturned where screening was used to bypass EIA despite cumulative risk.

In *People Over Wind v Coillte Teoranta* (CJEU, C-323/17), the European Court of Justice confirmed that mitigation cannot be relied upon at screening stage to avoid full Appropriate Assessment.

Relief Sought:

This proposed development and/or application must be deemed **invalid or incomplete** under **Sections 172 and 177U** of the Planning and Development Act 2000.

A full **Environmental Impact Assessment** and **Natura Impact Statement** must be exhibited and publicly consulted upon before further consideration.

3. Conclusion and Relief Sought

We respectfully submit that this development be deemed premature and/or any planning application should be refused on the following cumulative grounds:

- It is **premature**, speculative, and unsupported by any confirmed delivery partner or implementation timeline.
- It will **cause material injury to residential amenity** by way of height, massing, overlooking, and overshadowing.
- It lacks essential **sunlight, traffic, privacy and environmental assessments**.
- It is incompatible with multiple policies of the **Limerick Development Plan 2022–2028** and established planning law.

Relief Sought

In light of the deficiencies identified above, and pursuant to our rights as materially affected parties under the Planning and Development Act 2000 (as amended), we respectfully request that the Planning Authority take the following steps:

1. **That Limerick Council and/or An bord Pleanala make a formal finding that the application is premature** under **Section 34(4)(b)** of the Act, on the basis that the proposed development lacks a committed delivery mechanism, secured funding, and sufficient environmental and technical assessment to enable proper adjudication;
2. **Refuse permission in its entirety**, as the proposed development and/or planning application fails to comply with the principles of proper planning and sustainable development, and would materially contravene key objectives of the Limerick City and County Development Plan 2022–2028;

Alternatively, if any Planning Authority is minded to grant permission, we submit that it should only do so subject to the following minimum, non-negotiable conditions:

- A strict cap of three storeys for all buildings within 30 metres of Clanmaurice Avenue, including stepped-back upper levels to mitigate massing and visual overbearance;
- The mandatory submission of independent and verifiable studies addressing:
 - Sunlight and daylight impact (compliant with BRE 209 and BS 8206-2);
 - Overlooking and privacy assessments with detailed cross-sections and mitigation proposals;
 - A full Traffic and Transport Impact Assessment modelling operational and construction-phase effects on the local road network;
- A binding and enforceable prohibition on all construction, haulage, service, or operational access via Clanmaurice Avenue, to preserve residential amenity and safety;
- The public exhibition and consultation of a comprehensive Environmental Impact Assessment (EIA) and Natura Impact Statement (NIS) prior to the determination of any permission, in compliance with Sections 172 and 177U of the Act;
- The submission of evidence confirming a named development partner, a funding agreement, and a phased construction programme, including implementation timelines and delivery sequencing, to ensure accountability and prevent site dereliction or fragmentation.

Summary

It is our considered view that the proposed development represents an incoherent and excessive response to a site of significant heritage, landscape, and civic importance. Rather than realising the full long-term potential of the former Cleeves campus, the current proposal attempts to over-intensify a constrained urban site with dense and poorly integrated massing. A more appropriate, balanced, and sustainable scheme might focus on a low- to medium-density mix of adaptive reuse of existing heritage buildings, the creation of public green space, and modestly scaled residential or cultural uses that are compatible with the surrounding neighbourhood. There is substantial potential for a development that celebrates the site's historic character while meeting Limerick's needs for community infrastructure, public amenities, and architecturally sensitive regeneration — but this application, as currently framed, fails to achieve that.

Yours sincerely,

Willie Ryan
Aideen Ryan

Armoury, Clanmaurice Avenue
North Circular Road
Limerick, V94 C7WE
Email: williamryanbl@gmail.com
Date: 17th June 2025