



Labour

An Bord Pleanála
61-64 Marlborough St.
Dublin 1
D01 V902

8th May 2019

AN BORD PLEANÁLA	
LDG-	<u>015806-19</u>
ABP-	<u></u>
09 MAY 2019	
Fee: €	<u>50.00</u> Type: <u>Cheque</u>
Time: <u>9-11</u>	By: <u>PosV</u>

OPERA CENTRE DEVELOPMENT – LIMERICK CITY
Section 175 of the Planning & Development Act (the Act)
- Application for Development (10 year Permission)

LIMERICK CITY AND COUNTY COUNCIL: Section 175 Planning Application to An Bord Pleanála for the Opera Site Re-Development, including a mixed use scheme of primarily offices, supported by a range of retail & nonretail services, cafes/restaurants, licenced premises, apart-hotel, civic/cultural uses (including a city library in the existing town hall), residential, refurbishment of existing protected buildings and open space. The 2.35 ha site is located on a city block bounded by Michael St, Ellen St, Rutland St., Patrick St. and Bank Place, Limerick

Dear Sir/Madam

Further to the above development proposal, I wish to submit the attached Observation in relation to the development on behalf of the Labour Party, Limerick City Constituency.

I also attach cheque for the required fee of €50.

Yours Sincerely

Brian Thompson

Constituency Secretary

cc Jan O'Sullivan TD
Tom Shortt, Chairperson

encls



To: An Bord Pleanála

May 2019

OPERA CENTRE DEVELOPMENT – LIMERICK CITY

Section 175 of the Planning & Development Act (the Act)

- Application for Development (10 year Permission)

LIMERICK CITY AND COUNTY COUNCIL: Section 175 Planning Application to An Bord Pleanála for the Opera Site Re-Development, including a mixed use scheme of primarily offices, supported by a range of retail & nonretail services, cafes/restaurants, licenced premises, apart-hotel, civic/cultural uses (including a city library in the existing town hall), residential, refurbishment of existing protected buildings and open space. The 2.35 ha site is located on a city block bounded by Michael St, Ellen St, Rutland St., Patrick St. and Bank Place, Limerick

OBSERVATION

The **Labour Party** had, in September 2017, made a submission (see Appendix 1) to Limerick City and County Council (the Council) on its earlier proposals and noted the large volume of submissions made by concerned members of the public and community organisations, on foot of which the whole development was reviewed by the Council and a decision taken to refer revised proposals to An Bord Pleanála for a decision in the form of an Application for approval under Section 175 of the Act.

The **Labour Party** has reviewed these revised proposals and, while still welcoming the apparent commitment of Limerick City and County Council (LCCC) to the well being of Limerick City Centre, it is disappointed that the proposals in relation to Housing are still peripheral to the central thrust of the development and do not address housing need either in the local context of Limerick City or in the national context of addressing the housing crisis.

- The **Labour Party** is most concerned that, although a residential element has now been included in the development, it is a very minor component to the overall scheme comprising only 16 apartments (34 bedspaces) in a development comprising a whole city block. It is estimated, based on the gross floor areas given, that the total residential floor area comprises only 4.5% of the total gross floor area of the development. This compares with an offices floor area of 58.2%.
- The Council had previously maintained that the development of an Aparthotel (57 rooms) was part of residential provision and should be taken into account as such. *This provision will not address our concerns as it allows only short term*

unsecured accommodation in what are essentially Hotel rooms and these should be assessed as such by the Board rather than as residential accommodation.

- Housing should form an integral part of the brief for any development of such a large portion of a city's central core. The **Labour Party** agrees with and commends the earlier observation (dated Dec. 2018) submitted to Limerick City & County Council by Prof. Merrit Bucholz of the School of Architecture at the University of Limerick that (amongst other observations):

The plan should be re-oriented to the long-term success, vitality, and life-affirming qualities of Limerick City, and re-designed to be driven by the joined values of high quality and useful public spaces, and high quality and affordable housing.

There have been ample studies of the city centre carried out by the Intelligence Unit at the University of Limerick to generate a basis of briefing for any publicly led development in Limerick City. These studies and the methods employed by the Intelligence Unit should be applied to the Opera Site to achieve the best outcome for the city.

- The **Labour Party** also has concerns with respect to building height and to excessive concentration of office accommodation to the detriment of other uses. These concerns are articulated in our earlier submission attached and forming part of this submission (see Appendix 1).

Conclusion:

The **Labour Party** calls for the proposals to be amended and revised proposals developed for the site incorporating:

- A substantial and sustainable residential component of new affordable apartments.
- A reduction in the height of the office tower to the northern side of the site to address issues of appropriate scale and overshadowing.

in line with previous expectations for the site at the time it was purchased.

Appendix:

Appendix 1: Submission by the Labour Party to Limerick City and County Council – September 2017

end

