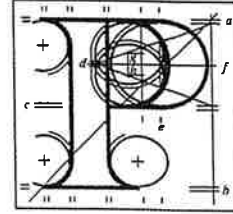


Our Ref: ABP-304028-19



An  
Bord  
Pleanála

Elizabeth Hatz  
28A Mount Pleasant Street Lower  
Rathmines  
Dublin 6

Date: 10th June 2019

Re: 10 year permission for opera site re-development including a mixed use scheme of primarily offices, supported by a range of retail and non-retail 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.  
Site bounded by Michael Street, Ellen Street, Rutland Street, Patrick Street and Bank Place, Limerick.

Dear Madam,

An Bord 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.

A receipt for the fee lodged is enclosed.

Please note that the proposed development shall not be carried out unless the Board 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 Board.

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Kieran Somers  
Executive Officer  
Direct Line: 01-873 7107

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

To  
An Bord Pleanála  
64 Marlborough,  
Dublin 1.

From  
Elizabeth B. Hatz  
28A Mount Pleasant Street Lower  
Rathmines, Dublin 6

<b>AN BORD PLEANÁLA</b>	
LDG-	016281-19
ABP-	
29 MAY 2019	
Fee: €	50
Type:	Cash
Time:	17.19
By:	hand

Date: 28 May 2019

**RE: PLANNING APPLICATION SUBMISSION REG. REF: PL91 .304028 – APPLICATION BY LIMERICK CITY AND COUNTY COUNCIL FOR DEVELOPMENT AT THE OPERA SITE, BANK PLACE, ELLEN STREET, RUTLAND AND PATRICK STREET, MICHAEL STREET, LIMERICK**

Dear Sir/Madam,

## 1. Introduction

1.0 I, **Elizabeth Hatz**, of 28A Mount Pleasant Avenue Lower, Dublin 6 wish to make a submission on the planning application by Limerick City and County Council for the proposed development listed above.

## 2.0 Grounds of Objection

### 2.1 The respect for the location

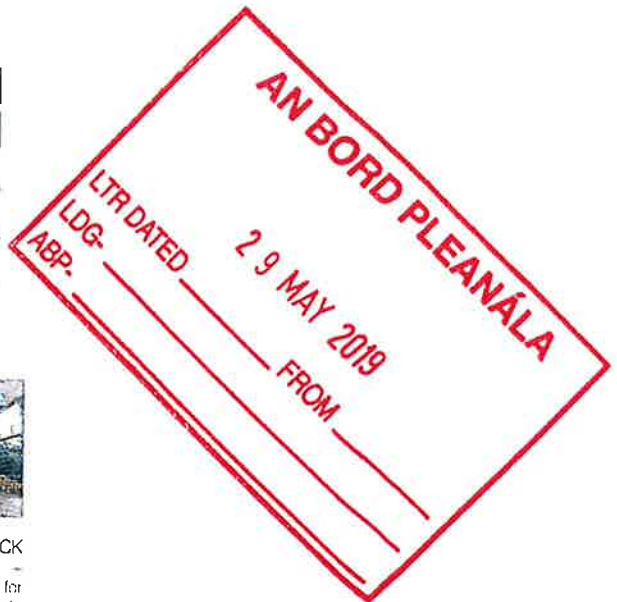
The proposal does not take sufficient consideration of the historic, spatial and architectural values of the site. These values have an impact on the quality of the urban spaces, and also on the attraction of the city as a place to live, work, learn, invest and visit. Any proposal in such sensitive environment needs to show an understanding of the specific existing urban character in terms of scale, material and public space.

*The 15-storey office tower* proposed for Bank Place would have a detrimental impact on this part of Limerick city centre, by dwarfing protected adjacent and nearby buildings and structures: The Granary building (present library), The Hunt Museum, Old Town Hall, The Abbey River bridge and quays, including The Potato Market, The Court House and St Mary's Cathedral. The choice of materials of this tower adds to its detrimental impact, presenting a disharmonious clash with the existing surrounding fabric, which is dominated by brick, stone and, to minor extent, render. It would for ever destroy the relatively homogenous character and the consistent scale of this characteristic historic heart. This is clearly visible particularly in photo montages number 9, 10, 11, 12, 13, 14, 15, 20, 21 and 22.

Some of the photo-montages are not sufficiently indicative as they fail to represent the tower with adequate accuracy. For instance, is the angle chosen to show the tower half hidden in images 2 and 3, and very faint as if part of the sky, in image number 13, while it in reality would have a much stronger domination, in relation to the Hunt Museum and its surroundings. Despite this, the tower stands out as alien in the urban context and not adding any architectural or spatial value, due to its commonplace form and overwhelming scale.

*The proposed new building on the corner of Patrick street and Ellen street, shows less understanding of appropriate scale, proportions and material than the existing building from the 1990-ties, which is in sound condition.*

*The interior of the block presents today a valuable and rare urban environment, linked to the history of the site in its vicinity to the former Customs House (now the Hunt Museum) and characterised by impressive well-built stone walls, from previous structures and storehouses. These walls have not been taken into consideration in the application's assessment of the urban, architectural and historic values of the site. They constitute an important asset when linking new to old, as exponents of the unique character and history of this city block. Modern up-to-date and sustainable urban renewal in a historic centre requires respect for these values and competence to make them part of a living, contemporary, sustainable city.*



NEW LIVING LIMERICK  
attractive ideas for  
the opera site  
by SAC - Year 4  
FabLab 15 16th May

Existing stone walls are visible in future architects work with alternative detailed master plans for the Opera Site.

## 2.2 The lack of residential space – insufficient apartment provision

The purchase of this site by the LCCC was made possible through substantial government funding through the Department of Housing, Planning and Local Government (€12.5 million) in the context of the Limerick regeneration and linked to a planning expectation of a substantial amount of housing on the site, including social housing. (See appendix 1).

The proposed application designates itself as a mixed-use plan for the Opera Site. This term in contemporary planning means, also in commercial projects, a mix of commercial (offices, retail etc) and residential/housing spaces, sometimes with addition of other uses such as cultural, educational etc. The term is in this application mis-leading, because the proposal is for only 4% residential, which cannot motivate that the term is applied. The remaining 11% is for an “apart-hotel” which is not equivalent with housing/residential.

Ireland and in particular Limerick city centre are in urgent need of additional housing to meet an increasing demand, and a constant raise in population. In a city the size of Limerick it is crucial that the entire historic heart is inhabited in order to live and to be maintained properly. The Opera Site is the largest city block in the historic centre and what happens on it will have implications for the entire city for a long time ahead.

It cannot be defended to propose 70% offices and retail, while only 4% proper residential on a central site of this scale and importance.

The provision of housing in other areas does not compensate for this lack as the proposed scheme, through its single use, would condemn the largest city center bloc to being entirely dead weekends, late evenings and nights, adding to alienation and anti-social behavior in the area. The proposed library does not work as compensation, since it is also closed at late evening and night. This emptying effect of massive office clusters is a well-known fact in urban planning, why many planning authorities throughout Europe try re-introduce housing in single-use areas – and now avoid building them in the first place.

## 2.3 The viability of the plan as a sustainable, modern planning application

This is a fundamental issue relating to the validity of the plan as a sustainable proposal for a thriving city centre in Limerick.

The buildings proposed are unsustainable as they are so deep that artificial lighting will be needed even during daytime. This is not in line with urgent ambitions to minimize energy use, nor is it in line with current health value of natural daylight for human beings.

The proposed plan offers a “public plaza” in the centre of the plan. This is alien to the area as it turns inwards into the site as an island, with only limited connection to

existing and potential public rooms, in the surrounding Georgian and river quarters. This place will be deserted late evening and nights, adding to anti-social behaviour in the area. This will be aggravated in the case the office buildings would remain unoccupied for longer periods, which has long been the case in Limerick. See below 3.3.3.

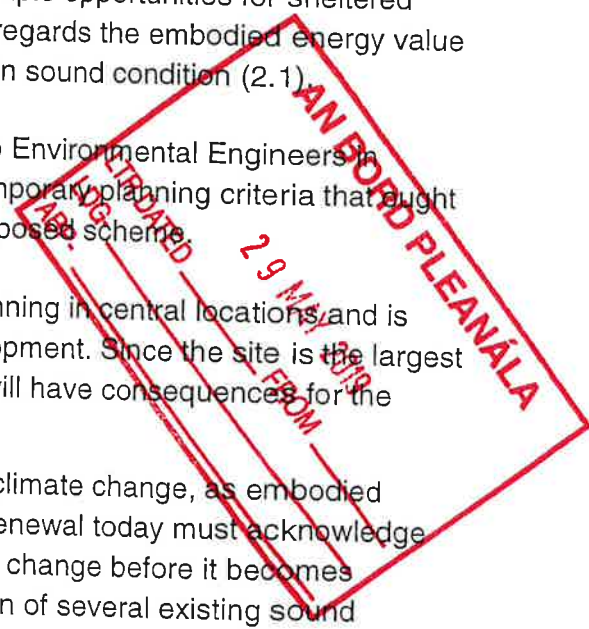
The proposed new library is not larger than the existing, and presents considerable waste of resources and of opportunity for housing. This new library has its public café in the basement why this will not add to the proposed public space at the centre of the bloc and will not connect to the existing street life.

The plan proposes no major green, planted or actively cultivated areas that could contribute to a healthy environment, activating citizens and community life. It only proposes a limited landscaped, overshadowed plot in the most-windy location, north of the tower. This has reference to corporate non-activating environments that are rarely successful places for citizens.

The plan implies demolition of huge and well-built historic stone walls in the interior of the block, without evaluation or motivation, and without indicating how and where the material should be used or transported. These walls offer today micro climate, historic, spatial and architectural character and ample opportunities for sheltered plantations and community life. The plan also disregards the embodied energy value of the existing contemporary buildings which are in sound condition (2.1).

The points below are derived from material by top Environmental Engineers in London, Atelier Ten. They high-light major contemporary planning criteria that ought to be considered but which are missing in the proposed scheme.

- **Mixed-use** is required for modern, sustainable planning in central locations and is key to success of self-sustaining community/development. Since the site is the largest block in the historic city centre, what is built there will have consequences for the entire city and for a long time ahead.
- **Reuse of buildings** is the greatest contribution to climate change, as embodied carbon is saved on day one. Urban planning and renewal today must acknowledge the 12-year deadline for every city to act on climate change before it becomes irreversible. (The proposed plan suggests demolition of several existing sound buildings instead of re-use.)
- **Longevity** through:
  - High quality architecture and character – timeless values and places which people will associate with and love. (The proposed architecture does not respect or add qualitatively to the valuable character of the area.)
  - Adaptability and flexibility – spaces, layout, fabric and infrastructure can change in line with changing lifestyle, political and economic trends:
    - demand for commercial/residential space or expanding cultural offer
    - internet/online/AI based (remote) work and culture
    - all-electric future: renewable energy, batteries, no cars/carparks ...etc



- co-working spaces for flexible use
- **Public realm** is at the heart of sustainable planning
  - 1<sup>st</sup> provide good environment – the proposed plan fails rigorously
  - Daylight/sunlight – proposed plan is unsustainable
  - wind and air – proposed plan creates windy public spaces
  - surfaces (radiation/warmth) – plan does not create good micro-climate

To these can be added following important considerations for sustainable planning:

- **Proximity to Shannon River:**
  - Opportunity to use water-source (heat pumps) for heating and cooling energy – all electric future
  - Storm water attenuation and flood risk mitigation – will become key in the future with climate change
  - Use of water for non-potable purposes (irrigation, toilet flushing, cleaning, fire protection/sprinklers) or even clean for potable use
- **Climate change resilience:**
  - Storm water attenuation (discharge to river directly, store water on-site in vegetated areas or dry pools/roofs)
  - Energy and water storage (batteries, thermal mass, tanks, innovative materials)
  - Food growing
  - Social engagement (to work as a system/community and not in isolation)
  - Buildings and infrastructure design for disaster response (no heat/coolth, power, water, food supply etc)
- **Health and wellbeing**
  - air quality
  - daylight/sunlight
  - humidity
  - materials selection
  - lifestyle (food, activity, psychological health, motivation...)



### 3. Further observations

#### 3.1 Public consultation was not proper.

For the public consultation, the public was only given 23 days to respond to the local authority with views. This is too short for a very large and complex site.

Further, the public was mis-lead by the use of the term *mixed-use*, not representing the true nature of the proposal.

The documentation stated that 15% residential was provided, already a very low number, but in reality only 4% proper residential is provided, while 11% is a hotel, with apartments. This is misleading the public. The documentation offered to the public did not properly show the impact of the scheme on surrounding historic monuments and protected buildings.

### 3.2 The quality of the Environmental Impact Assessment

Notwithstanding the above, the Screening Report fails to make meaningful assessment of potential impacts to the environment arising from the following, all of which are referred to at Schedule 2B of the Planning and Development Regulations 2001, as amended, as information to be contained in an EIS:

- Climatic impacts, particularly wind impacts arising the significant densification of the site and introduction of tall buildings. The result of the proposed tower is that the proposed new public space on Bank Place cannot be used properly as an outdoor room to gather in, a practical floor for the public, because to try mitigate wind effects, it must be elaborately landscaped and planted with non-indigenous evergreen trees, thus, it cannot be used for cafés or restaurants, for instance. Instead of a place with high use, it would become, as designed, a space with high maintenance. The public use is further obliterated by the large shadow which will dominate the place from noon to around 3pm. This shadow will also destroy the use of adjacent public spaces, such as the paved area in front of the Hunt Museum, in the mornings, when school children for instance need gather before and during visits to the museum.
- Landscape and visual impact arising from the proposed tall buildings. See above 2.1 regarding Respect for the Location.
- The impacts on flight paths of birds by the suggested tower, is suggested handled with flickering green light, adding to the alienation of the building from its calm historic setting. It is also admitted uncertain if this measure will have the desired effect on the birds in question.
- Cultural heritage impacts arising from significant demolitions to facilitate the development and significant interventions to retained protected structures.
- Daylight and sunlight impact assessment: the provided images tell us that significant shadowing is occurring in several places, without this being commented on. Examples: Hunt Museum front court, Bank Place, proposed inner public space. Save for presenting 3d diagrams, no assessment has been provided. The nature, scale and density of the proposal have the potential to have significant impacts in this respect. One such impact is the lack of daylight and exaggerated use of artificial light that the deep plans entail.
- Noise and vibration impact assessment. This is a significant construction project which will take place over an extended period and there is no evidence submitted to demonstrate that it can take place without significant disturbance to existing uses.
- Architectural and Urban Design Statement. Whilst a Planning and Design Statement has been submitted, there is little or no justification for the architectural and urban design approach provided.



### **3.3 Architecture and Design**

#### **3.3.1 Merit of Existing Buildings**

It is noted that a report by JCA Consulting is submitted with the application, which includes a statement of significance of the buildings on the site. It is however significant that the report, nor apparently any other report submitted with the application other than a section in the Planning and Design Statement prepared by Aecom, assesses the potential impact in architectural conservation terms of the proposed development on the buildings of merit, a number of which are protected structures. The input from the qualified conservation architect regarding this part has not resulted in proper evaluations, only surveys of the buildings and has entirely omitted recording and evaluating the unique and characteristic stone walls inside the bloc. Regarding the building from the 1990-ties on the corner of Patrick street and Ellen street, the architect is not even named and the building is not evaluated. It cannot be held that the proposed volume should have any higher architectural values than the existing, which respects both materials, proportions, windows and scale. It is the same case with number 3 Ellen street. 6-7 Rutland street, housing today the FabLab, has been suggested for demolition without further survey or evaluation.

The proposed development in many instances literally towers over retained protected structures and would completely dwarf them. The proposed development would have a significant overbearing and negative impact in visual terms, and in terms of proportionality, on these protected structures. A most significant note is the impact of the proposed tower building on the Hunt Museum, the Granary, Abbey River quays with Locke's Bar, St Mary's Cathedral, the Town Hall building, as described above (2.1, see views 9,10,11,17, 22), and the significant overbearing impact on Rutland Street, which is four storeys in nature. This is clearly visible in photo-montage 20.

It is submitted that in the absence of a design which has been progressed with due regard to the architectural conservation sensitivities of the area, both inside and outside of the bloc, and any evidence or supporting documentation in relation to same, no planning application should be granted.

#### **3.3.2 Impact of 15 Storey Tower**

The proposed 15 storey tower will have a significant negative visual impact on the cityscape and will have a severe overbearing impact on Rutland Street, Patrick Street and surrounding streets.

It is difficult to reconcile the sheer scale and height of the proposed development with the magnitude and significance of impacts described in the Visual Impact Assessment report by Aecom. A development of this nature and scale, isolated from other tall elements in the city, and directly adjacent to low rise Georgian streetscapes, must be acknowledged to have a significant and negative impact.



### 3.3.3 Commercial Viability / Market Demand

It is questionable if there is market demand for the proposed quantum of additional commercial office space in this part of Limerick city. There are currently three major office developments either under construction, finished or due to commence construction in Limerick namely

- Garden International (112,000 sq ft)
- Bishops Quay (154,000 sq ft)
- City East Plaza (320,000 sq ft)

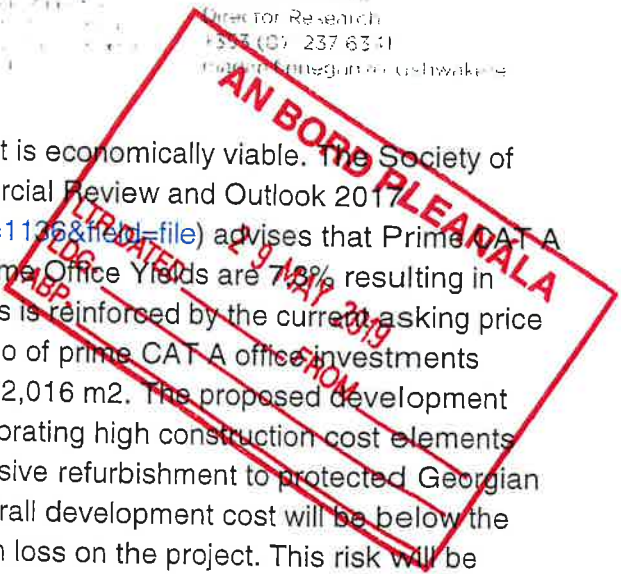
These three developments will provide over 586,000 sq ft of new office accommodation which when combined with the proposed Opera Centre will result in over 1,136,000sqft of new office accommodation in Limerick.

With an existing vacancy rate of 17.6% (the highest in the country) and a 2016 office take-up of 112,000 sq ft, we submit that there is no market demand for this scale and type of development.

Irish Office Market - Key Figures Q4 2016				
	Dublin	Galway	Cork	Limerick
Market Stock	1,274,247	111,000	1,000,000	151,000
Take Up 2016	112,000	10,000	10,000	10,000
Availability	1,162,247	101,000	990,000	141,000
Vacancy Rate	9.2%	9.0%	9.9%	9.3%
Under Construction	1,000,000	100,000	1,000,000	100,000
Completions 2016	100,000	10,000	100,000	10,000

Source: EY, Dublin Office Market Report Q4 2016, Galway Office Market Report Q4 2016, Cork Office Market Report Q4 2016, Limerick Office Market Report Q4 2016. Marian Finnegan, Chief Economist, Director Research, EY (T: 237 6311, m.finnegan@ey.com, @mfinnegan)

It questionable if the proposed development is economically viable. The Society of Chartered Surveyors Residential & Commercial Review and Outlook 2017 ([https://www.scsi.ie/documents/get\\_lob?id=1136&field=file](https://www.scsi.ie/documents/get_lob?id=1136&field=file)) advises that Prime CAT A Office rent in Limerick are €243 m2 and Prime Office Yields are 7.8% resulting in Capital Value in Limerick of €3,328 m2. This is reinforced by the current asking price for the Plassey Collection which is a portfolio of prime CAT A office investments which has an asking price capital value of €2,016 m2. The proposed development with a site value of €12.0 million and incorporating high construction cost elements such as high-rise office buildings and extensive refurbishment to protected Georgian structures has a significant risk that the overall development cost will be below the capital value of the development resulting in loss on the project. This risk will be further exacerbated by the potential over supply of office accommodation in the short to medium term.



#### 4. Conclusion

The proposed development itself, by reason of height, scale, massing and overbearing, would have a significant negative impact on the existing receiving environment.

The proposed development is not viable to revive Limerick city as it does not provide the quantum of residential dwellings appropriate to the development.

The proposed development will have a detrimental impact on the historic heart of Limerick City and is unsustainable, environmentally, socially and culturally.

**Having regard to the above, it is submitted that the planning application should be refused for the proposed development.**

**Due to the importance of the site as a strategic part of the development of Limerick, it is suggested that there should be an oral hearing.**

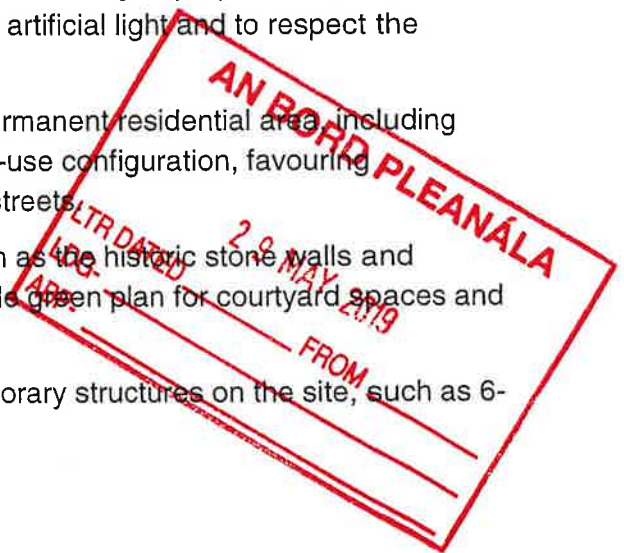
**Should the scheme be considered for approval, it is submitted that it should be entirely reconsidered and re-worked in the following parts:**

- Reduction of the tower to suit the character of the historic context, i.e. maximum 6 storeys; revision of both its materiality and its location to suit the context and allow for a sunlit, wind-sheltered public space on Bank Place.
- Revision of the massing, scale, architecture and materiality of proposed new structures to meet need of daylight, reduce dependence on artificial light and to respect the character of the Georgian quarter.
- Provision of minimum 60% housing as proper permanent residential area, including seamless provision of social housing, in a mixed-use configuration, favouring public/service activities on ground levels facing streets.
- Revision of demolition of historic structures, such as the historic stone walls and instead a plan for their integration in a sustainable green plan for courtyard spaces and community facilities.
- Reconsideration of demolition of sound contemporary structures on the site, such as 6-7 Rutland Street (FabLab) and 8 Patrick Street.

Yours faithfully,



Elizabeth B Hatz



## Schedule of Records

Freedom of Information Request No: 2017/276  
Section 4

Record No. & Brief Description	Date	Page Nos	Relevant Facts	Grant, Part Grant or Refuse	Basis of Refusal: Section of Act	Record edited/ Identify Deletions
1 Letter dated 9 November 2011 Re: Limerick Regeneration Programme – Opera Centre Site Purchase and Redevelopment	09/11/2011	2	Copy of letter from Jim Ganley, Department of Environment, to Tom Mackey, Limerick City & County Council	Part Grant, with redaction	36 (a) (b) (c)	Commercially sensitive information redacted







161

## Comhairle Cathrach Luimnigh

## Limerick City Council

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Luimneach  
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Mr Michael Layde,  
Assistant Secretary,  
Department of Environment, Community and Local Government,  
Custom House,  
Dublin 1.

28/10/11

*Jim*  
*28/10/11*  
*diff 1/11*

Re:- Limerick Regeneration – Strategic Development Sites

Dear Michael,

I refer to our recent communication with your office concerning the potential opportunity to acquire strategic development NAMA sites for the social and economic regeneration of Limerick City under the broad heading of the Limerick Regeneration Programme. Regeneration, as you know, encompasses a broader, strategic view, not limited to consideration of just housing, which must look to solutions beyond its immediate boundaries. To that end, it is our considered opinion that a reversal in the decline in the fortunes of the City core would positively impact on the regeneration of the Kings Island area while also benefiting the wider City. In that regard, the City Council considers that the purchase of the "Opera Site" from NAMA represents an exceptional opportunity to arrest the decline in the fortunes of Limerick City Centre. **A strategic development at this location could restore the residential and commercial uses to the heart of the City while positively contributing to the overall regeneration initiative, not least in terms of replacement housing provision.**

In terms of the planning context, the Government's National Spatial Strategy has assigned to Limerick the role of 'Gateway' to the Mid West with all the contingent responsibilities of becoming an economic hub for the region and the focus of growth and development. This key role has been further elaborated in the economic strategy incorporated in the Regional Planning Guidelines recently adopted by the Mid West Regional Authority whereby the strategies of the four local authorities in the region must focus on this aim. It is clear, however, that a significant shift must take place if this is to be achieved, given the current challenges presented by economic sprawl beyond the City boundary and the negative impact of this on the City core. Reversing this trend, through appropriate planning and development is key to regenerating Limerick.

In addition, and in response to Ministerial guidelines and legislative direction, the authorities of Limerick City Clare and Limerick County have also prepared and agreed joint strategies on Retailing and Housing and the policies which provide a clear focus for future planning in the region and which identify the regeneration of the City centre as an important objective which will have a broadly beneficial impact on the wider City. These important strategies have already been incorporated into the Core Strategies of the respective development plans to guide our development. The joint retail strategy, in particular, has assigned Limerick City Centre a key role in leading the development of retailing in the region competing effectively with suburban centres. The joint Housing strategy has made provision for the sustainable provision of housing on



brownfield lands in the City. Both of these objectives are consistent with a mixed use development on the "Opera Site".

In parallel with the statutory planning processes, Government has also provided very strong support for the Limerick Regeneration Programme and the Mid-West Task Force, both of which are charged with promoting economic regeneration within the City and in the wider mid-West region.

Mindful of all these parallel processes, Limerick City Council established an initiative to guide the economic regeneration of the City Centre underpinning of the various strategies from National through Regional and down to Local plan-led redevelopment and regeneration. This City Centre strategy was unanimously adopted by the City Council in 2008.

~~In its City Development Plan of 2010 Limerick City Council adopted policies and took the necessary powers in line with the City Centre Strategy so as to ensure that significant economic~~ development opportunities could be established in the City Centre further supporting and complementing the regeneration initiatives. It is our contention that the "Opera Site" provides significant opportunities to deliver on this strategy through the provision of housing (social and private) which will increase demand in the City Centre, through new commercial and retail opportunities which will refocus economic activity on the City Centre, and through the potential for new civil spaces that will entice people back from the suburbs into the City core.

The City Council has responsibility for ensuring that the urban fabric of the City core is maintained, through its responsibilities under the Derelict Sites Act. The site in question is rapidly deteriorating in the absence of any active use, which provides an overwhelming argument for Government involvement, both from a public safety perspective and, arguably more importantly, in terms of protecting our architectural heritage. This site is part of the Georgian City and we are seeking to protect and retain this character in the regeneration of the City core.

While it is always preferable for the private sector to deliver these high value projects, the current economic climate does not lend itself to a private sector led regeneration of this area. In addition, given its importance both from a strategic and a heritage perspective, it may in fact be preferable for a public sector led regeneration, albeit with a strong commitment and investment by the private sector. It is well recognised that the future development will have to be developed in partnership with the private sector if the regeneration effort is to be sustainable.

Limerick City Council has a proven track record in public sector led regeneration in partnership with private sector investment. In the 1980s and 1990s Limerick City Council in partnership with Shannon Development led the delivery of €1b worth of private sector investment under the various government initiatives for urban renewal. In fact a street block adjacent to the Opera Centre site, which was totally run down in the early 1980s, has been transformed under an urban renewal scheme providing an excellent example of public sector led regeneration. This area of the City now host a thriving commercial/retail and residential block in the City centre.

In terms of the site itself, this undeveloped site has planning permission for 34,000 Sq M of net retail floorspace out of a total gross floor area of 43,000 Sq M. The site also includes an existing multi-storey car park on Denmark Street (Copy of map enclosed).

It comprises one of the largest urban blocks in the Georgian City with frontage onto four streets, three of which have a high profile. The site is highly strategic being located adjacent to the Arthur's Quay Shopping centre, the Hunt Museum, the City Library, the recently refurbished Milk Market and the historic tourist area of King's Island creating an opportunity for a tourist centre of the City. In addition, it adjoins a number of multi-story car-parks including that of Arthur's Quay which is in the ownership of Limerick City Council. The de-tenancing process which followed the initial acquisition and site assembly has exacerbated the visible levels of vacancy in the City centre and has contributed to the derelict appearance of this area of the City, a situation we would be anxious to alleviate in as short a time as possible.

As outlined previously, it is the view of the City Council that this site constitutes a key strategic site in the economic and social development of the City and the Region in line with National, Regional and City Development Plan policies. It is also considered of significant importance in terms of regeneration of King's Island both for the social and economic regeneration aspects, but also in terms of the provision of replacement housing.

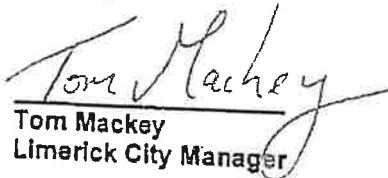
As the current zoning allows for mixed use development, the site undoubtedly offers an excellent opportunity to develop this area of the City to provide a significant sustainable economic and social dividend to the City community.

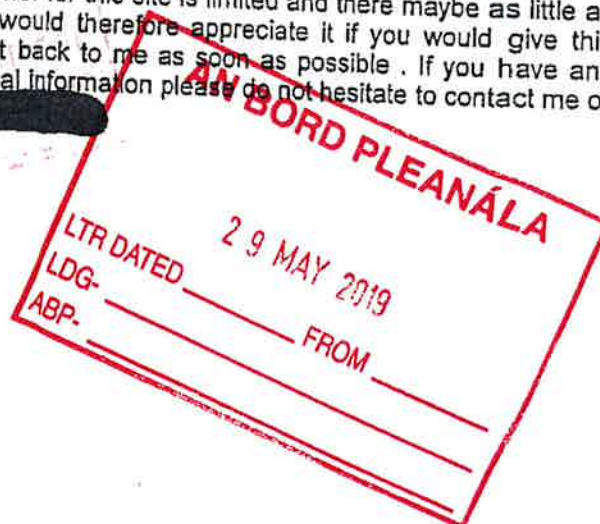
It offers potential for retail, commercial and residential units, all of which can contribute to this dividend. From our initial assessment, the site could comfortably accommodate in excess of 160 residential units with the remainder for much needed retail/commercial activity with potential for civic uses.

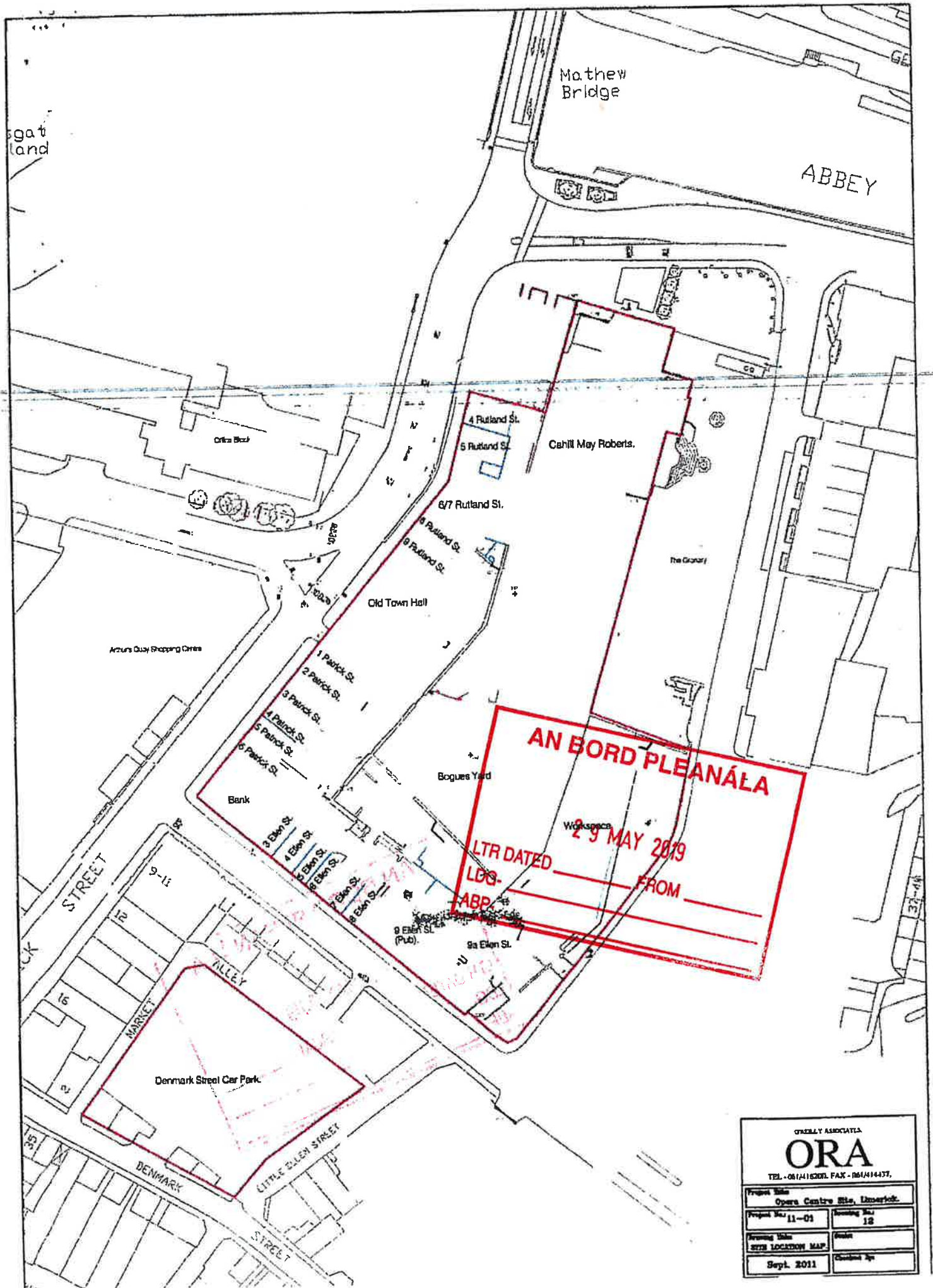
With our proven track record in public sector led regeneration in partnership with private sector investment, there is no reason why Limerick City Council could not achieve similar success with the "Opera Centre" site. However, in order to achieve this in the current economic climate, Limerick City Council must have control of the site to ensure the site is developed efficiently and effectively to address the need for social and economic regeneration of Limerick City under the broad heading of the Limerick Regeneration Programme.

In that regard, I wish to seek approval from your Department to fund the purchase of the "Opera Centre Site" out of the capital allocation from the Limerick Regeneration Programme. I understand that the timeframe to make an offer for this site is limited and there maybe as little as two weeks left in the bidding process. I would therefore appreciate it if you would give this request favourable consideration and revert back to me as soon as possible. If you have any queries on the above or require any additional information please do not hesitate to contact me or Oliver O'Loughlin, Director of Service [REDACTED]

Yours sincerely,

  
Tom Mackey  
Limerick City Manager





Mathew Bridge

ABBEY

Cahill May Roberts.

Old Town Hall

**AN BORD PLEANÁLA**

29 MAY 2019

LTR DATED  
LGG-APP

FROM

Denmark Street Car Park

ORRERY ASSOCIATES <b>ORA</b> TEL - 0812416201, FAX - 0812414437	
Project Site Opera Centre Site, Droichead Ára	
Project No. 11-01	Drawing No. 12
Drawing Title SITE LOCATION MAP	Scale
Sept. 2011	Checked By



9 November 2011

Mr. Tom Mackey  
Limerick City Manager  
City Hall  
Merchants Quay  
Limerick

**Re: Limerick Regeneration Programme – Opera Centre Site Purchase and Redevelopment**

Dear Mr Mackey,

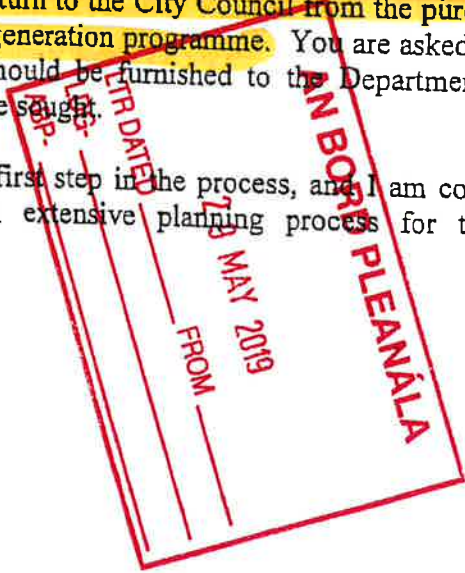
Further to your submission dated 28 October 2011, and subsequent initial capacity study, I am pleased to inform you that the Department is supportive of your proposal to acquire and manage the redevelopment of the Opera Centre site as part of the overall Limerick Regeneration Programme.

In arriving at this conclusion, the Department undertook a multi-criteria analysis of the proposal, relative to a number other options, and has concluded that the strategic importance of the site in terms of the social, economic and physical regeneration of the City Centre and King's Island areas is such that the City Council should pursue the acquisition of the site in the first instance. To that end, the Department has determined that an initial bid of no more than the reserve price of €12.5 million should be made.



You are asked to note that this funding approval for the acquisition of the site is subject to the following conditions. In the first instance, funding approval is subject to the redevelopment of the site within seven years. Should the redevelopment not proceed within that timeframe, the City Council will be required to recoup the purchase price of the site by means of the orderly disposal of the site or from within its own resources. In such an event, the Department will determine the appropriate use for the funds i.e. as an offset against other housing commitments or to be returned to the Department. Secondly, the Department notes that any redevelopment of this site will likely involve private sector investment in commercial and housing units. Proceeds from the disposal of elements of the site, rents, or any other financial return to the City Council from the purchase of this site must be reinvested in the wider regeneration programme. You are asked to note that an annual return on such proceeds should be furnished to the Department and prior approval for any reinvestment should be sought.

The acquisition of the site is just the first step in the process, and I am conscious that there will be a requirement for an extensive planning process for the ultimate



redevelopment. To that end, you are reminded of the requirements of the Department of Finance's Capital Appraisal Guidelines whereby the Department is required to review, in detail, any redevelopment proposals prior to investment decisions being taken. On that basis, you are asked to liaise closely with the Department's regeneration technical adviser, Mr. Paul Altman and the APO with responsibility for the regeneration programme, Deirdre Mahony, throughout the planning process. Particular consideration should be given to ensuring the private sector involvement in the redevelopment is maximised, both in an effort to minimise exchequer investment and to promote sustainable development. The involvement of the NDFA, a requirement of the Capital Appraisal Guidelines, will, I hope, contribute positively to this aspect of the redevelopment planning process. You may wish to consider establishing a Redevelopment Planning Group involving the Department, the NDFA and other relevant stakeholders e.g. Shannon Development to progress this process.

Again, I would like to take this opportunity to express the Department's ongoing support for the regeneration programme in Limerick. We remain committed to ensuring that this important programme continues, despite the current financial constraints. The City Council is presented with a significant opportunity to ensure that regeneration becomes a priority programme within the new Local Government structure, and I consider the purchase of this site as the first important step in that process.

Yours sincerely,

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Jim Ganley  
Principal Officer  
Housing Programmes - Regeneration



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From: "Seamus Hanrahan" <seamus.hanrahan@limerickcity.ie>  
Date: 02 November 2011 18:56  
To: "Deirdre Mahony - (DECLG)" <deirdre.mahony@environ.ie>  
Attach: SPR\_HOUSING11110218230.pdf; 1D2O5821\_resize.JPG; 1D2O5825\_resize.JPG;  
1D2O5829\_resize.JPG; 1D2O5831\_resize.JPG  
Subject: Preliminary Capacity Study

Deirdre

As discussed earlier attached preliminary capacity study to assist with the appraisal. This is outline in nature.

The approach is to locate a large department store at the southern end of the site with its main entrance at the junction between Ellen Street and Michael Street. This unit will act as an 'anchor' and activate the streets in the surrounding area. ~~There is also an entrance off Rutland Street. Both of these entrances have been moved away from the side entrance to Arthur's Quay Shopping Centre in order to drive footfall along the linking streets.~~ The buildings along both Rutland Street and Ellen Street are largely retained with a mix of commercial, retail and residential. These buildings will act as a screen for the department store 'box'. The department store is 10625m<sup>2</sup>. A service yard is located with access of Michael Street to serve the anchor. A library is shown with access of Bank Place. This could also be an office. The Library is 5760m<sup>2</sup>. The number of residential units is split between residential above ground floor level on Rutland and Ellen Streets and new residential constructed above the library and department store accessed off a roof garden. The total number of units is 161 (59 in existing buildings and 102 new units). The old Town hall building is shown as a 'civic' building. There are two commercial buildings on Rutland Street with commercial on every floor.

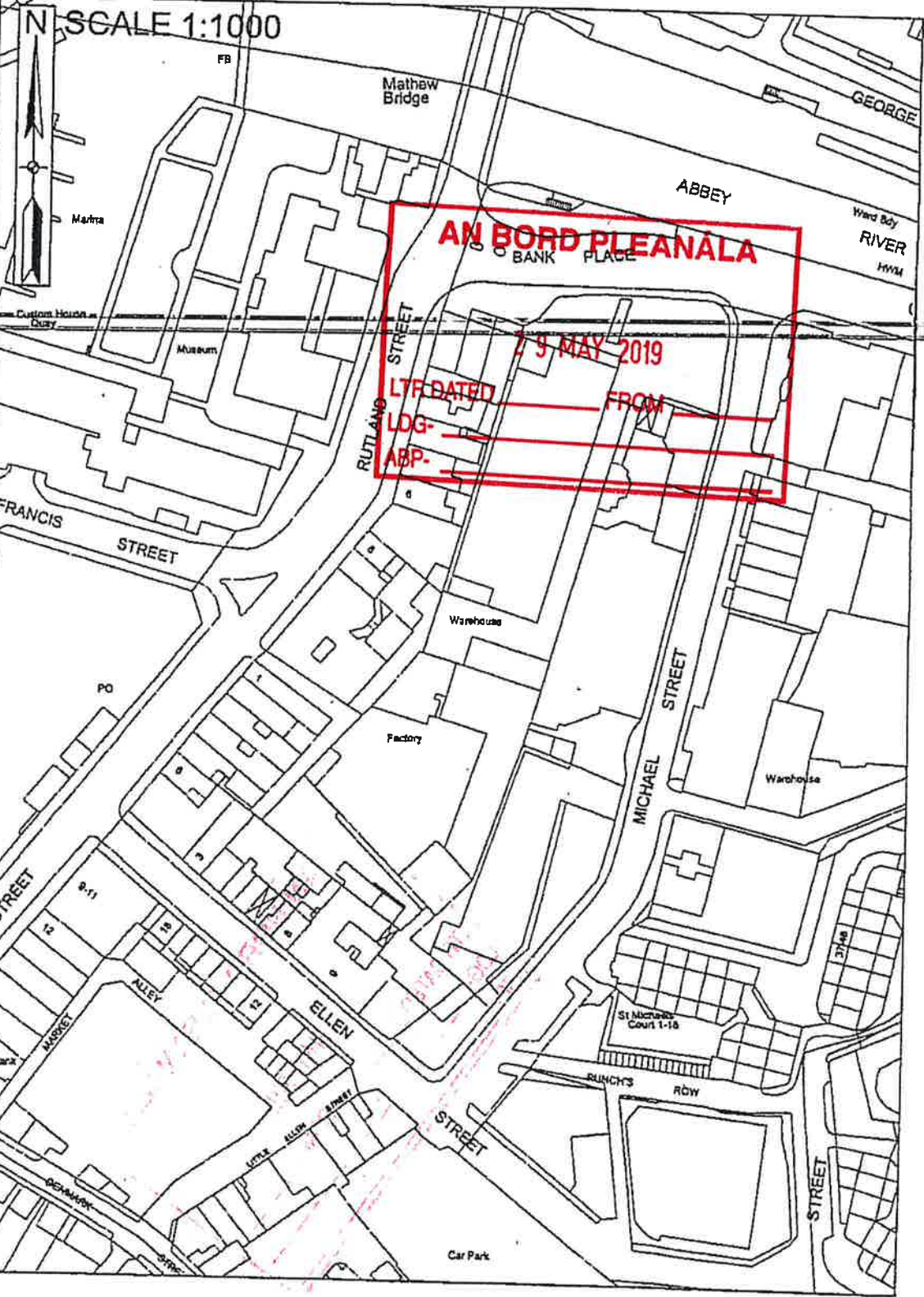
I have also attached some new photographs I had taken over the weekend.

I will give you a ring to discuss in the morning.

Seamus Hanrahan  
Senior Executive Architect  
Limerick City Council  
061-407100



N SCALE 1:1000



**AN BORD PLEANALA**  
29 MAY 2019  
LTF DATED FROM  
LDG-  
ABP-

Mathew Bridge

GEORGE

ABBEY

Ward Boy RIVER  
HWM

Custom House Quay

Museum

RUTLAND STREET

FRANCIS STREET

Warehouse

Factory

MICHAEL STREET

Warehouse

STREET

9-11

12

18

12

ELLEN STREET

St Michael's Court 1-18

BUNCH'S ROW

MARKET

ALLEY

LOVE ALONG STREET

STREET

STREET

Car Park