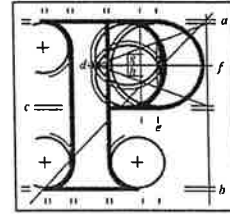


Our Ref: ABP-304028-19



An
Bord
Pleanála

Tara Robinson
Apartment 137
The Matthew
O'Callaghan Strand
Limerick

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,

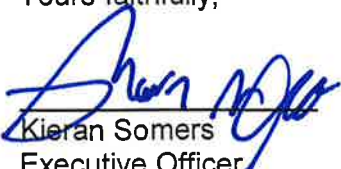
An Bord Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter. A receipt for the fee lodged is enclosed.

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

The Secretary,

An Bord Pleanála,

AN BORD PLEANÁLA
64 Marlborough Street, Dublin 1

LDG- 016 242 -19
ABP- _____

28 MAY 2019

Fee: € 50 Type: PLUO

Time: 10:11 By: RJ

RE: Submission to An Bord Pleanala on Opera Site

Reference: PL91 .304028, Mixed used development of offices buildings etc.

304028: Site bounded by Michael Street, Ellen Street, Rutland Street, Patrick Street and Bank Place, Limerick.

Lodged on 22/03/2019 by Limerick City and County Council

To whom it may concern,

I would like to make a submission to An Bord Pleanala concerning the plans for the so called "Opera Site", planning for which is due for decision soon. Given the site has been derelict for such a long time, the development is very welcome one. As it is also the largest of the city based projects being delivered by the 2030 Special Purpose vehicle it is also crucial to get it as right as we can.

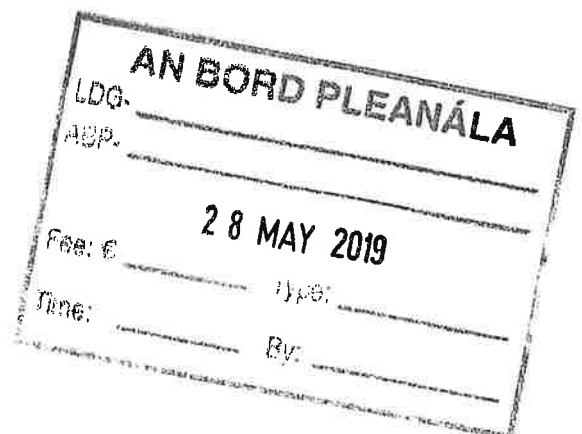
My submission relates to fears or concerns I would have about the proper sustainability of the development, the process by which the plans were conceived and whether the development will fulfill the current and future needs of the city. I am writing in my capacity as a concerned citizen.

1. My first question is regarding the **proposed use of the site and the lack of permanent residential units** in such a large development. While not being a planning expert my belief is that mixed use developments which include a high percentage of accommodation have been viewed as the most successful approach to urban developments. Excluding permanent residential in units from this development may seriously undermine the goal of attracting economic investment and employment in a city that is very under inhabited. Each week we are treated to the welcome news of new jobs announcements in Limerick. Many of the companies are high tech, creative industries as well service industries. Presumably these will be staffed by professionals, some of whom may be moving to Limerick, possibly from abroad and would see living in the city and being within walking or short commute from work as desirable. Increasing City Centre Living is a key goal in the council's plans and we are in the middle of a housing crisis. Yet there are few if any plans for new builds in the city centre and unfortunately the take up of the Living City initiative has been poor. Limerick can give itself a serious competitive edge on other Irish and international cities by providing more high quality and affordable city centre accommodation. I feel this site should contain a minimum of 60% permanent residential and mixed housing, in order to make a living city and meet urgent local demands. This should also help combat the donut residential effect in Limerick where more and more people are forced to live in the low density, suburban areas.
2. My second concern relates to **potential over supply of office space** in Limerick and whether this equates to balanced and sustainable development? Apparently we have approaching 25,000 square metres of office space developed in the Hanging Gardens and in the Kirkland Centre in Limerick. Why is there need for another massive development of office space here. We also believe that another of the Limerick 2030 projects will also produce more office space- Cleeves Factory. It appears that this project is set to rehouse tenants from office blocks- in Sarsfield House. This is a building that could be renovated and upgraded to a very high standard. So rather than knocking a building and moving people to a block across the road why not reduce the plans for office space and instead building housing. The experience in Limerick after the last building boom and bust was that that the city was left with considerable empty office space all over city, it would be a pity to see ourselves back in that position again. Limerick 2030 has referred to 'market' research they conducted, It would be wonderful to make this public so we can see the rationale behind these decisions to focus on retail/commercial and office space (and some cultural). It would possibly serve to allay fears that we will have another set of ghost spaces in the event of another economic downturn.

3. My next comment would be around the **design and aesthetics** of the site. Rather than contributing to the the attractiveness of the built environment, the proposed build look so very anachronistic. It appears to me be an off the shelf glass tower development with a huge plaza tucked away in the middle. It is aesthetically dead. Limerick 2030 claim there will be cultural areas, but the experience in other large scale office developments is that people do not was to spend time in them. I cannot see this development being much different. In fact with plans for retail and office use, I'd be worried that what you'd end up is a no go area which you'd actively avoid once the evening comes. Worse still it could be a possible draw for anti-social behaviour. I'd be very interested in seeing how can you ensure the that the plaza and surrounding areas will be utilised by citizens? We need to avoid producing similar dead zones such as those created in relatively recent developments in Limerick- e.g. those around Steamboat Quay, Mount Kennett, down by the Clarion and the stretch leading up to Clare Street.
4. **Environmental Impact and Excessive Height.** The area in which this development is being proposed is a very historical area of Limerick. I am really concerned that a proper environmental impact has not been conducted on the development. How will the 14 storey tower block impact on the skyline of the surrounding area which includes St Mary's Cathedral, The Hunt Museum, The Granary, and the Georgian street. Will the development block out light on the surrounding public spaces, what about shadows and the impact of winds due to the building? Surely we can come up with something more sympathetic to the historic fabric and scale of the surrounding area. What about the impact of building process and noise pollution?
5. Finally with regard to the Special Purpose Vehicle-2030. I understand **Limerick Twenty Thirty Strategic Development DAC** is 'the first, local authority wholly-owned special purpose vehicle created in Ireland to deliver a city and county wide programme of investment' and are charged with overseeing a 500 million investment in infrastructure. As far as I can find out there are only business people and councillors on the board, nor can I see how they were appointed to the company. I also am curious as to whether there are any stakeholders represented and would be very interested in the mechanisms they are using to consult with those stakeholders. Would this lack of consultation be common practice in such large scale public developments? Given the huge sums of public money being earmarked for the four 2030 strategic sites, I'd question whether the current company structure coupled with the the use of Part 8 Planning would result in adequate scrutiny for its plans.
6. To summarise, what really stands out for me as a citizen is how heavily the 2030 proposals are skewed towards economic and commercial development, it is essential for a project like the Opera site, to consider the social and cultural development in tandem, including looking at opportunities for residential and educational use. The big fear I would personally have is that we would repeat bad planning mistakes of the past by treating big flagship projects and developments in isolation of each other, with little reference to the overall vision for the city which is well articulated in the Limerick City Development Plan. (see overleaf). I would urge An Bord Pleanála to ensure that an Environmental Impact Assessment is conducted on the plans along with a proper review of the plans to revisit the plans for the Opera Site, in order to ensure the development is balanced and does not conflict with what is laid out in key Limerick City and County Council policy/strategy documents and takes into account the current needs of citizens of Limerick in terms of housing and living in a high quality, planned built environment.

Kind regards,

Tara Robinson

References

Overall Goals of the Limerick City Development Plan

The vision of the Plan is for Limerick City to continue to grow as the centre of economic, social and cultural development for the Midwest Region. For this to be realised Limerick City must be a cohesive and sustainable community of people; where natural surroundings and important resources are protected; where cultural and built heritage is safeguarded; where opportunities exist that allow people to live and work in a safe environment with excellent public infrastructure and services together with ample cultural and leisure facilities. The Plan outlines Limerick City Council's policies for improving the social, economic, cultural and environmental health of the City both through direct action and in conjunction with other stakeholders i.e. the State, private and community sectors. It is based on three fundamental and interrelated goals, which underlie all the policies contained in the Plan.

Goal 1

To promote and provide for the sustainable development of Limerick City enabling it to fulfill its role as a National Gateway City. This goal seeks to promote the social and economic development of Limerick City in a balanced and environmentally sustainable way. This will involve measures to promote a range of commercial, industrial and cultural developments; to increase the quantity and range of housing provision and to reverse the decline in population; to regenerate the City Centre, and other parts of the City in particular those identified in the regeneration programme; and to develop a high quality sustainable transport system. It is the belief of Limerick City Council that this can be best achieved in the context of an enlarged administrative area.

Goal 2

To promote social inclusion and to facilitate equality of access to employment, education, transport, suitable housing, social and cultural activities, whether by direct provision (e.g. social housing) or by facilitating others to provide the service (e.g. education). Limerick City Council believes that the City Centre should be the centre of commercial and cultural activity in the Region. This belief is supported by a number of other strategies including the National Spatial Strategy the Regional Planning Guidelines for the Midwest Region. The City Council is committed to the regeneration process currently underway in the areas of Moyross, Kings Island, Ballinacurra Weston and Southill. The City Council is also committed to ensuring that the proposed policies and actions will contribute positively to social inclusion and help meet the requirements of the National Action Plan for Social Inclusion.

Goal 3

To provide for a high quality natural and built environment and improved quality of life for those living and working in Limerick City and also for those visiting the City. The attractiveness of the City is to a large degree dependent upon the quality and character of the environment – the buildings, the public realm, the amenity spaces and the natural heritage. A good quality environment is extremely important to the City for reasons of quality of life and economic prosperity. The City Council will therefore introduce a range of measures in this Plan to ensure a high quality built and natural environment for the City.

References

Limerick City Development Plan

<https://www.limerick.ie/sites/default/files/media/documents/2017-06/Limerick%20City%20Development%20Plan%202010-2016%20%28Including%20Variations%202-6%29.pdf>

2030 An Economic and Spatial Plan for the City

https://www.limerick.ie/sites/default/files/limerick_2030_report.pdf

Limerick 2030 DAC Strategic Plans

<http://www.limerick2030.ie/>

