

# **ENVIRONMENTAL IMPACT ASSESSMENT REPORT**

## **VOLUME III APPENDICES**

Appendix 4-1 EIAR Scoping Material



**HRA | PLANNING**

# CLEEVES RIVERSIDE QUARTER

## PLANNING STAKEHOLDER CONSULTATION

SEPTEMBER 2024

LIMERICK  
TWENTY  
THIRTY



# CONTENTS

1. THE SITE
2. MASTERPLAN SUMMARY
3. HERITAGE & CONSERVATION STRATEGY
4. PUBLIC REALM
5. UTILITIES & SERVICES

# 1 THE SITE



# CLEEVES TODAY

## EXISTING SITE PLAN



The Site

# CLEEVE'S TODAY

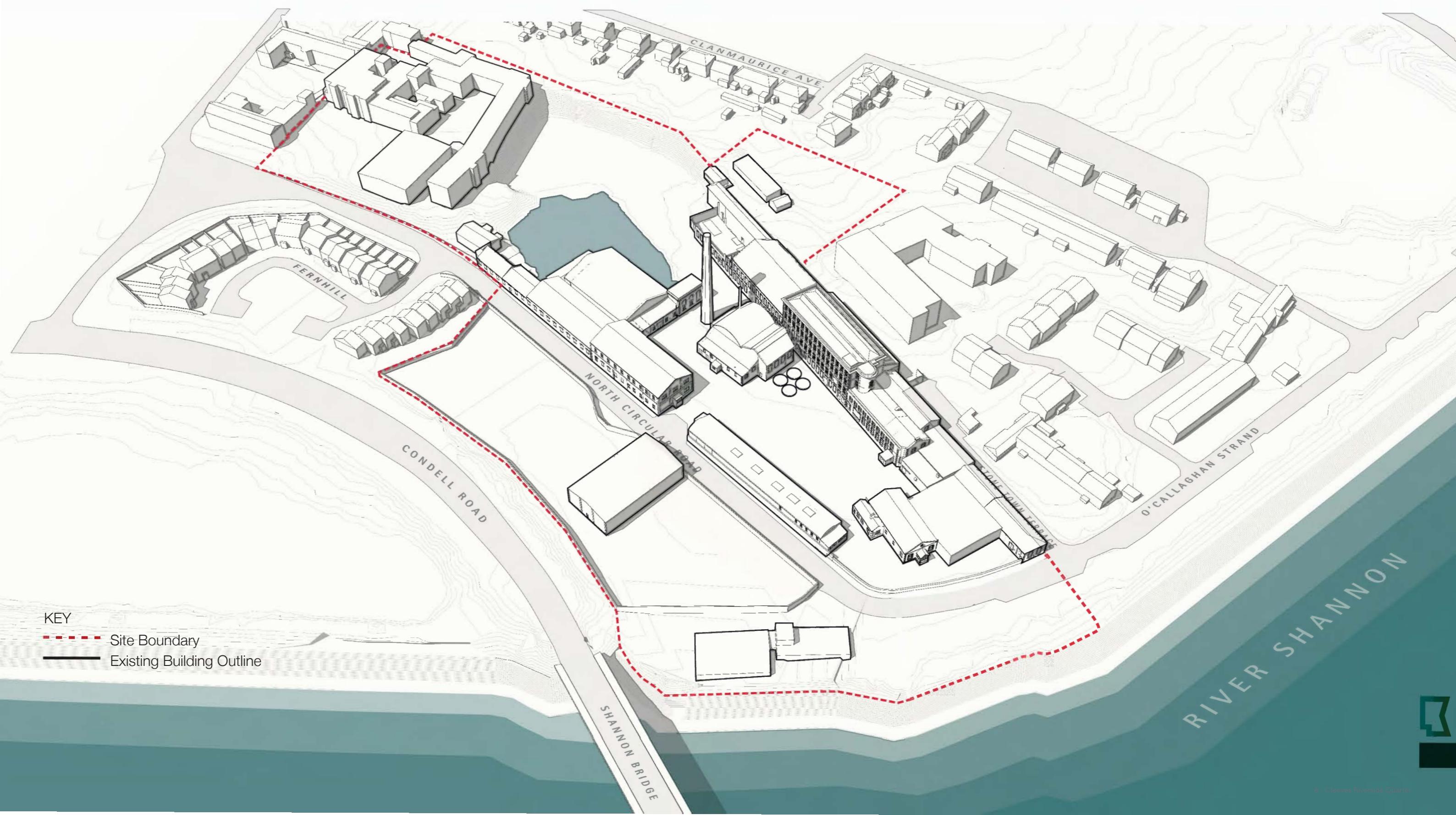
EXISTING SITE PHOTOGRAPH



The Site

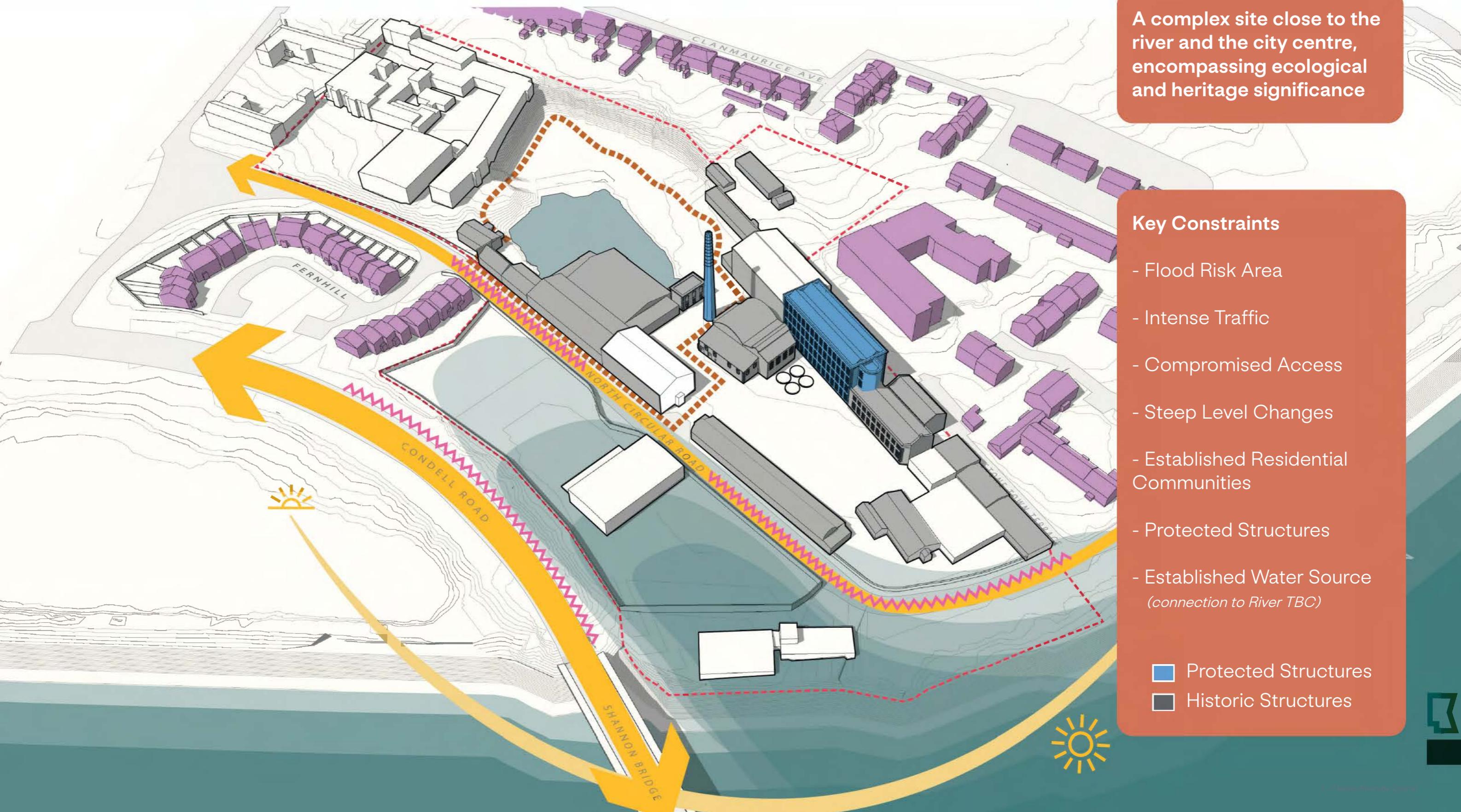
# CLEEVES TODAY

EXISTING SITE AERIAL



The Site

# SITE CONSTRAINTS



The Site

# SITE OPPORTUNITIES

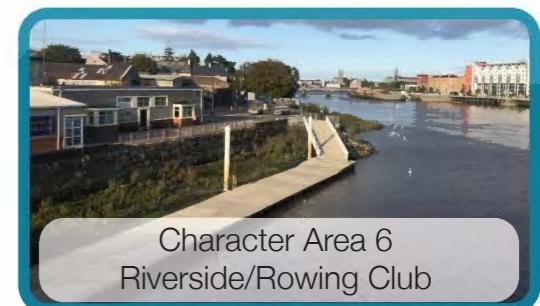
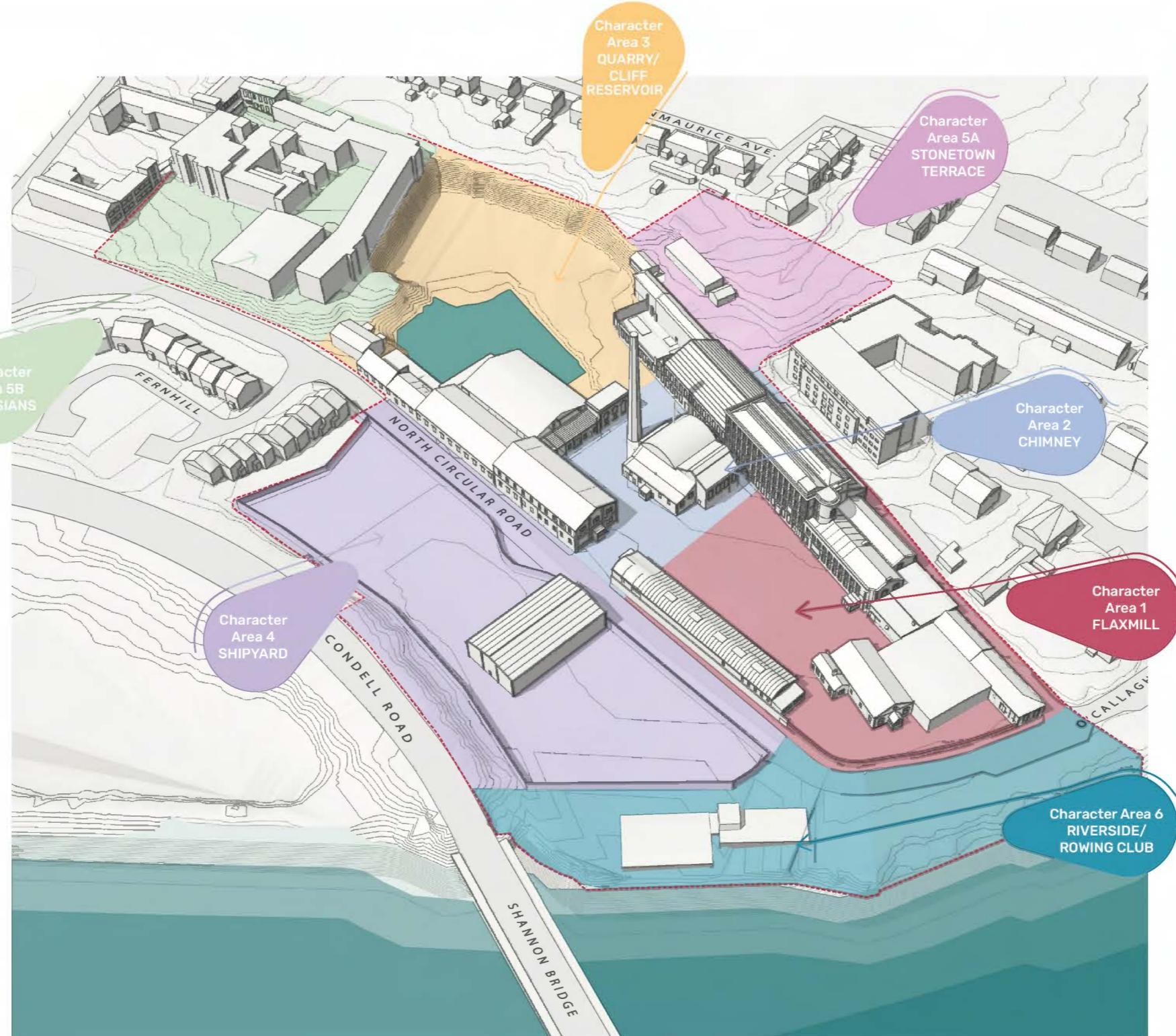
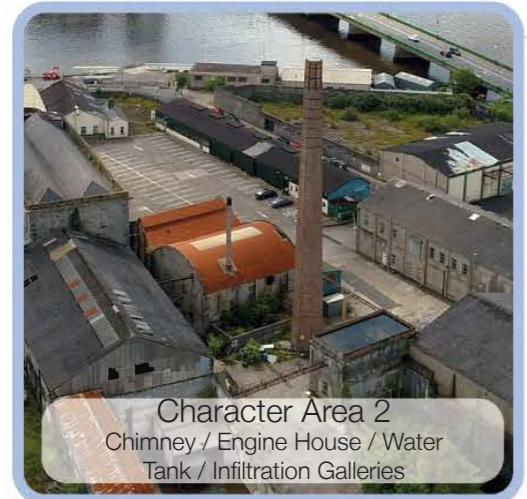
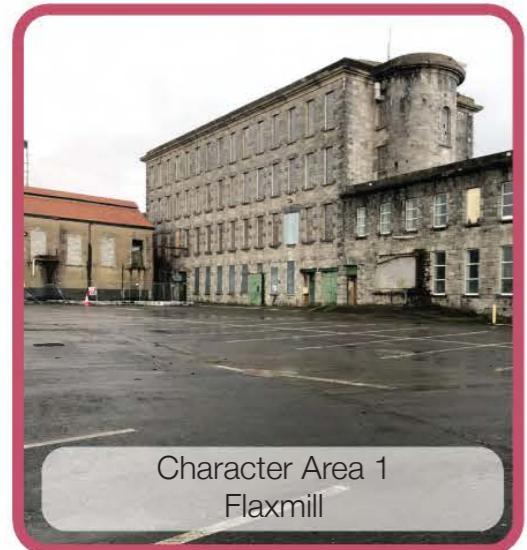


## Key Opportunities

- Activate Public Realm
- Introduce Green Space
- Enhance Biodiversity and Create New Civic Realm
- Reactivate the River Path
- Maximise Views Across the River
- New Green Boulevard
- Connect to surrounding landscape
- City destination
- Cityscape landmark

The Site

# CHARACTER AREAS



# 2 MASTERPLAN SUMMARY

Masterplan Summary

# FUTURE MASTERPLAN

**PBSA**  
3. Quarry

**270 BEDS**  
5,000sqm NIA

**RESIDENTIAL**  
2. Salesians Site  
4. Stonetown Terrace  
5. O'Callaghan Strand

**230 UNITS**  
11,500sqm NIA  
3,500sqm NIA  
1,500sqm NIA

**COMMERCIAL**  
1. Flaxmill  
5. O'Callaghan Strand  
6. Infiltration & NCR  
7. Shipyard

**28,850 SQM**  
1000sqm  
350sqm  
4,500sqm  
23,000sqm

**EDUCATION**  
1. Flaxmill

**4,500 SQM**  
4,500sqm

**MIXED USE**  
2. Salesians Site  
6. Infiltration & NCR

**2,150 SQM**  
150 sqm  
2000sqm



Aerial view of the scheme proposed for the overall Cleeves Riverside Masterplan

Masterplan Summary

# CURRENT PLANNING APPLICATION

**PBSA**  
3. Quarry

**270 BEDS**  
5,000sqm NIA

**RESIDENTIAL**  
2. Salesians Site  
4. Stonetown Terrace  
5. O'Callaghan Strand

**230 UNITS**  
11,500sqm NIA  
3,500sqm NIA  
1,500sqm NIA

**COMMERCIAL**  
1. Flaxmill  
5. O'Callaghan Strand

**1,350 SQM**  
1000sqm  
350sqm

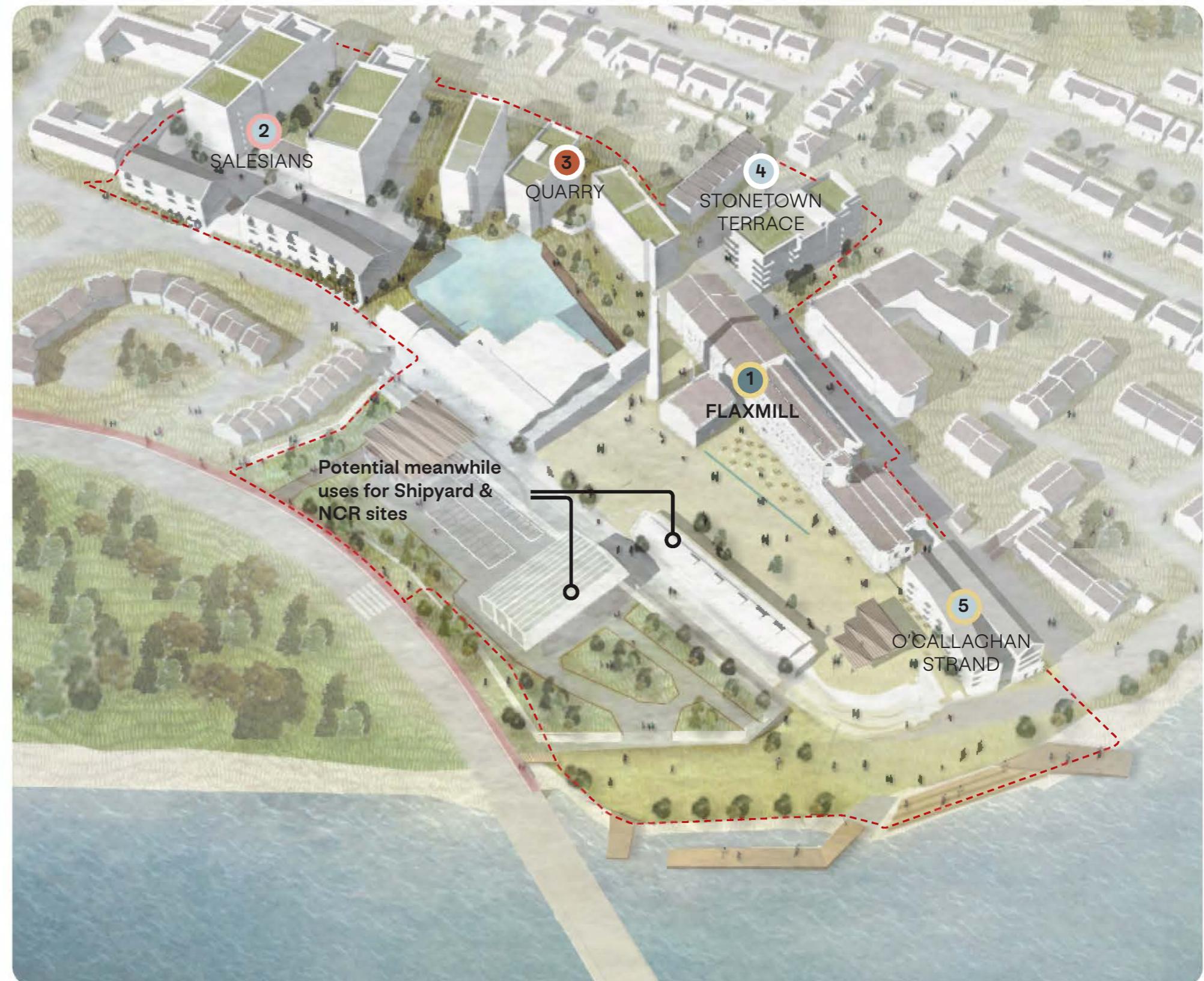
**EDUCATION**  
1. Flaxmill

**4,500 SQM**  
4,500sqm

**MIXED USE**  
2. Salesians Site

**150 SQM**  
150 sqm

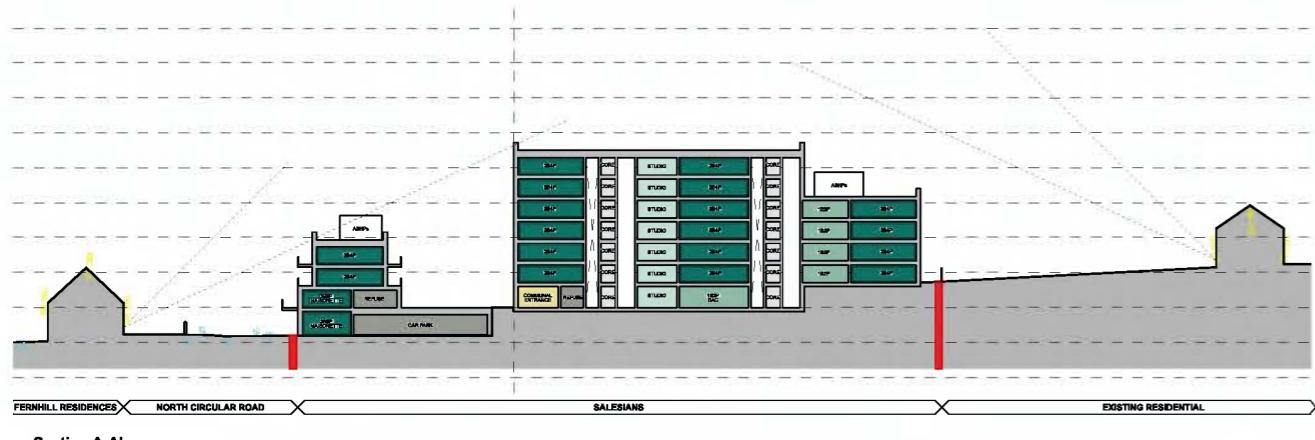
**POTENTIAL MEANWHILE**  
6. Infiltration & NCR  
7. Shipyard



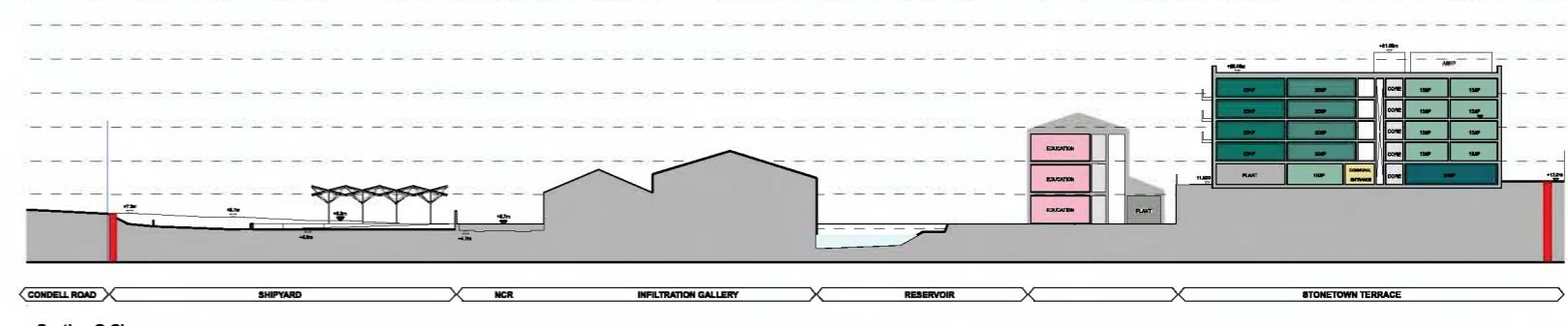
Aerial view of the scheme proposed for the current planning application

Masterplan Summary

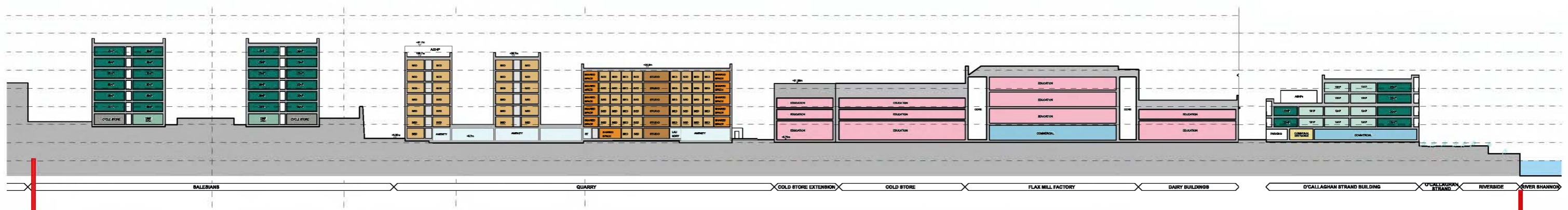
# MASTERPLAN SECTIONS



Section A-A'



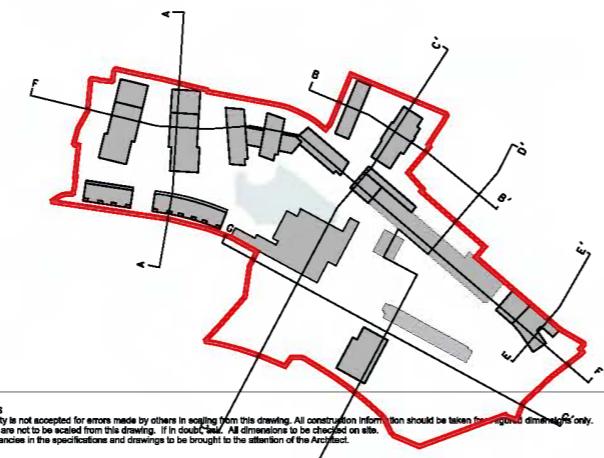
Section C-C'



USE	RESIDENTIAL TYPE	PBSA TYPE
Mixed Use	1B1P	Standard Room w/ ensuite
Education	1B2P	Universal Access (1p)
Commercial	2B3P	Studio (1p)
Plant/Ancillary (Dotted in Areas)	2B4P	Shared Space
Communal Amenity Space	3B5P	Student Amenity Space
Private Amenity Space		

0 5000 10000 25000 50000

**DISCLAIMERS**  
 1. Responsibility is not accepted for errors made by others in scaling from this drawing. All construction information should be taken from original dimensions only.  
 2. Dimensions are not to be scaled from this drawing. If in doubt - All dimensions to be checked on site.  
 3. Any discrepancies in the specifications and drawings to be brought to the attention of the Architect.



# 3 HERITAGE & CONSERVATION STRATEGY

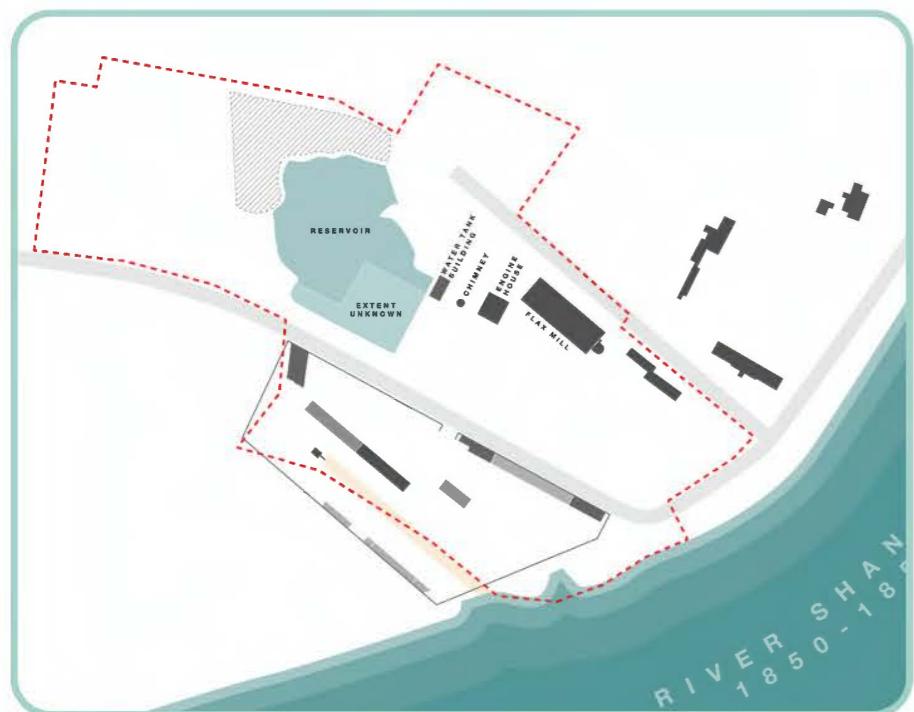


# SITE HISTORY

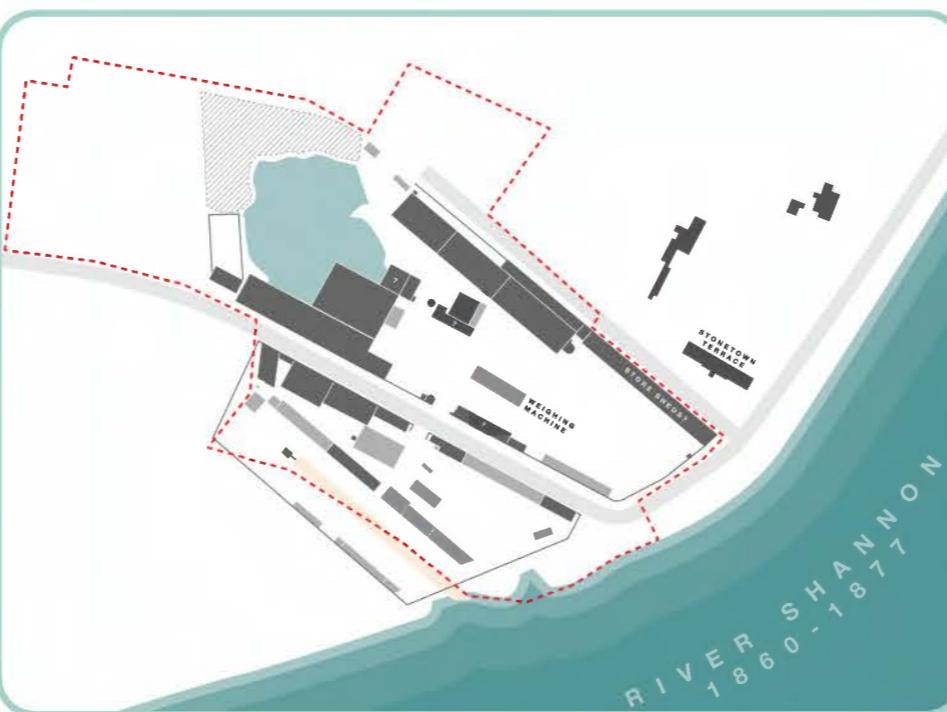
## Phase 1 - Flaxmill

1850 - 1877

Spinning Mill constructed by flour milling magnates J.N. Russell



1877: End of site life as a Flaxmill

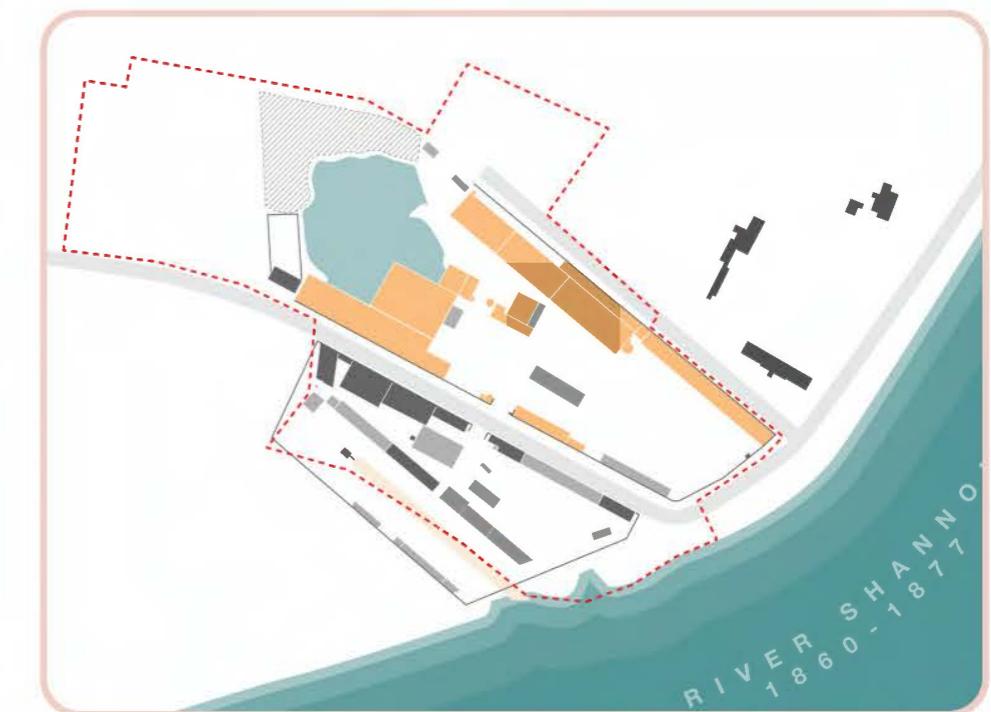


## Phase 2 - Flour Mill

1878 - 1883

1878 - Russell flour processing business uses site for the company. Buildings stripped of equipment and adapted to for new use.

1883 - End of site life as a Flour Mill



# SITE HISTORY

## Phase 3 & 4 - Condensed Milk

1884 - 1923

Site used for Cleeves Condensed milk developing to accommodate new processing methods followed by decline



## Phase 5 - Dairy Disposal Co.

1927 - 1973

1927 - Factory in state ownership  
1960 - Chimney shortened by 30ft

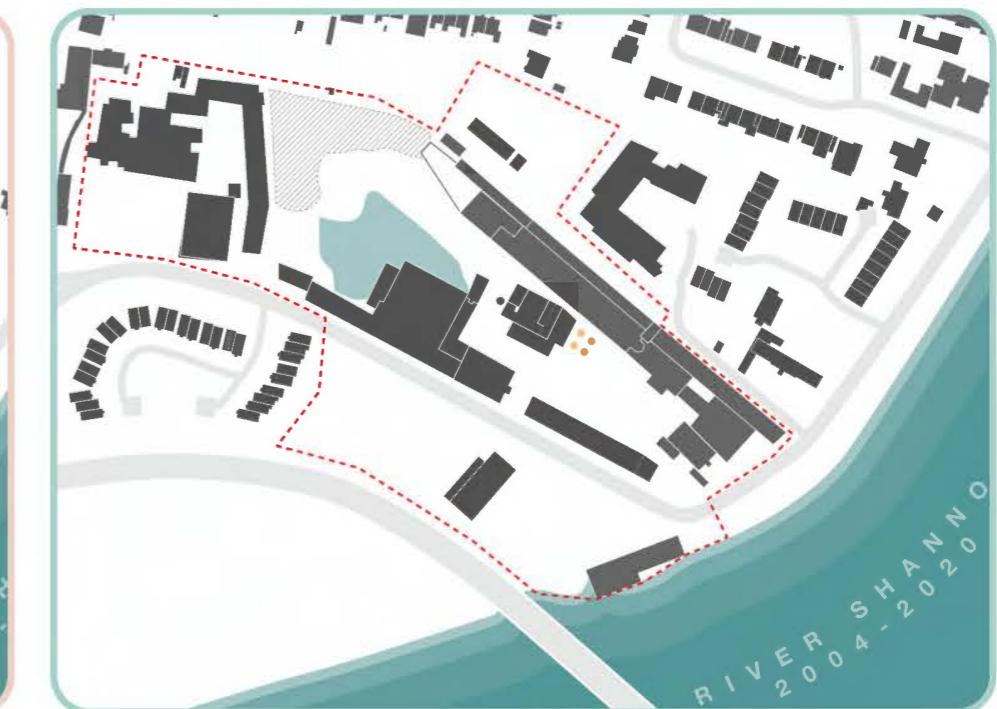


## Phase 6 - Golden Vale

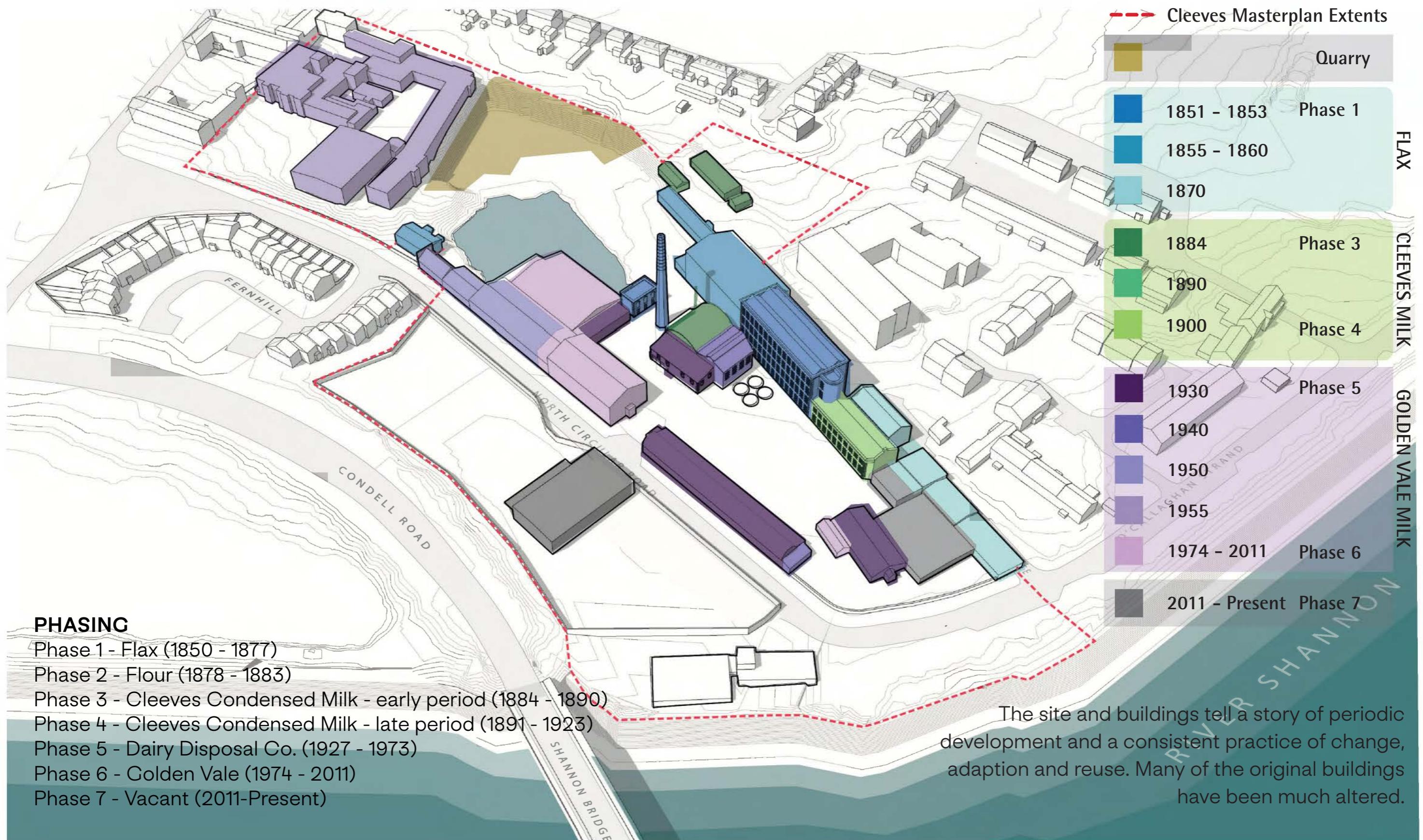
1974 - 2011

1970s - Site operation and production moved into Golden Vale ownership. Extensive changes to all buildings.

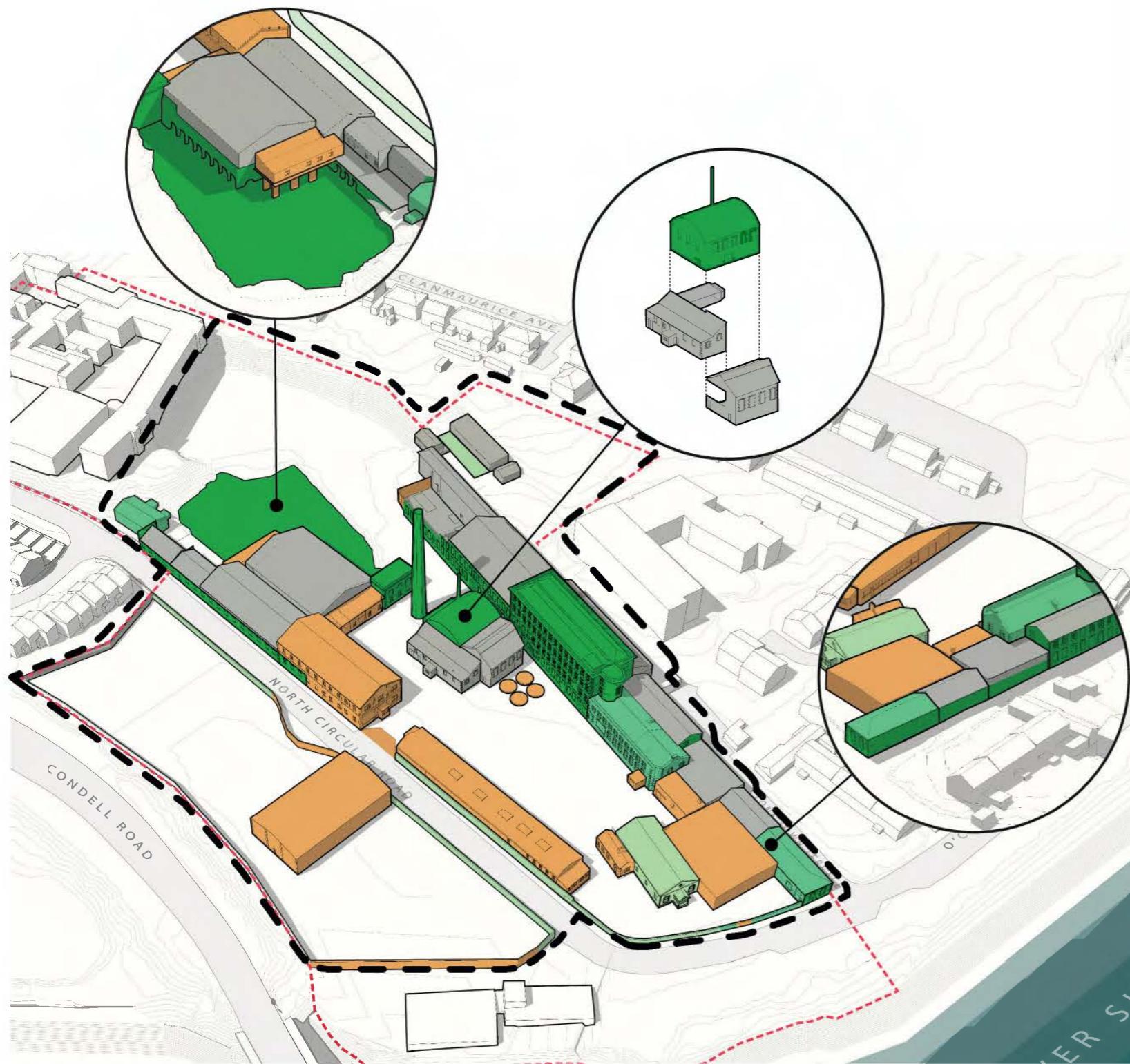
*Phase 7 - 2011 - Site becomes vacant  
2015 - Site purchased by LCCC  
2020 - Site transferred to LTT*



# SITE HISTORY



# SIGNIFICANCE OF THE CLEEVES PROTECTED STRUCTURES



## Significance

### Primary Heritage Values:

- Historical
- Architectural
- Technological

### Secondary Heritage Values:

- Archaeological
- Artistic
- Social

Structures from the period of the Flax Mill retain high significance as do those of the initial phase of the Cleeve's operation from the period 1884-1895.

### Highest Significance:

- Structures from the Flax Mill phases
- Early Structures from the Cleeves phase

### Medium and Low Significance

- Elements from all phases

There is much on the site that dates to its operation post-1927 and which imposes a negative impact.

### Negative Significance:

- Broadly many changes post-1927

The heritage gains that can be made will be most successfully achieved by balancing the vision for re-use with the careful retention of significant historic fabric.

### Potential for Heritage Gain:

- Peeling back negative elements
- Repairing historically significant fabric
- Bringing the buildings and site back into use
- Investigating and sharing the history of the site
- Positive Re-use that cerebrates the historic fabric
- Making relevant parts of the site and historic buildings publicly accessible

Refer to Statement of Significance for analysis and detail.

## Historical Significance

- High
- Medium
- Low
- Negative
- More Investigation Required
- Not part of the Cleeves Protected Structures
- Cleeves Protected Structures Curtilage

# SIGNIFICANCE OF THE CLEEVES BOUNDARY WALL

## Boundary Walls

- Phase 1 of the historic development of this site
- built of stone taken from the site quarry
- some parts original
- much has been changed or rebuilt
- walls follow the earlier roads that pre-dated the Flaxmill
- wall stretches between buildings built at the boundary

The wall informs understanding of the phasing and operation of the site and its historic closed nature. It served to secure the site, protecting the operation within and allowing the management of employees. Like many reuse schemes past uses contract with future reuse objectives and invite careful consideration.

## Managing Change

potential for the wall to be altered, adapted and removed as part of a scheme for the positive reuse of the site overall.

### Historical Significance

- High
- Medium
- Low
- Negative
- More Investigation Required



North Circular - Flaxmill Site Boundary



North Circular - Flaxmill Site Boundary



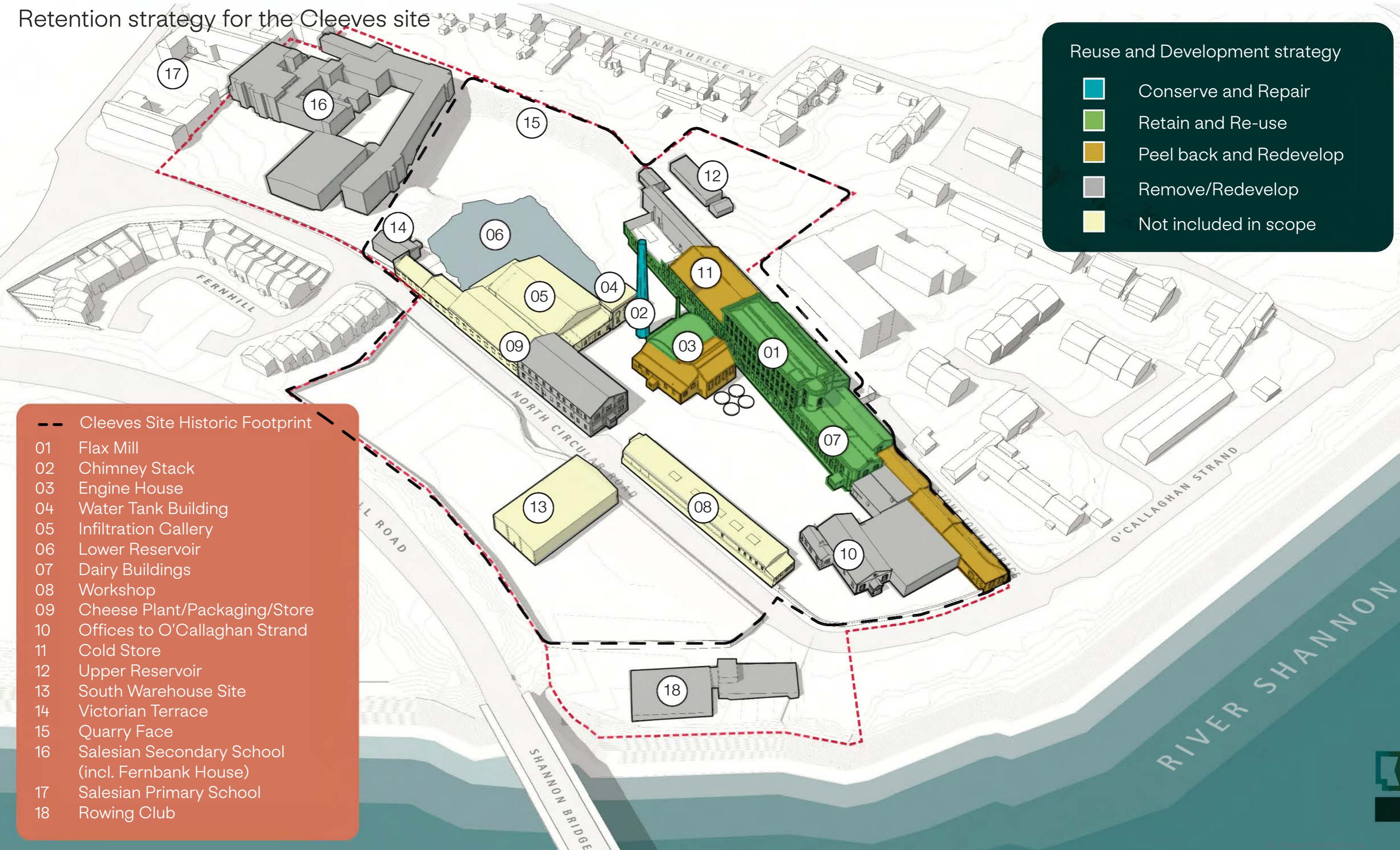
Stonetown Terrace Approach - Flaxmill Site Boundary



North Circular - Shipyard Site Boundary

# FABRIC RETENTION STRATEGY

# Retention strategy for the Cleeves site



# 4 PUBLIC REALM



# LANDSCAPE MASTERPLAN



## Overview of approach to public realm

- Spaces with varying character
- Flaxmill Sq as a significant civic space
- Quarry Park and Reservoir as a green space

## Green Infrastructure Strategy

- amenity
- natural heritage
- water quality
- nature-based sustainable drainage,
- cultural heritage

## Green and Blue infrastructure

- New public park in the Quarry area
- Greening strategies for the Flaxmill plaza, riverfront, and North Circular Road
- Temporary use of the Shipyard
- Nature-based solutions for SuDs to improve water quality and attenuation and increase biodiversity, amenity and contribute to educational functions

## Biodiversity

- Maximise biodiversity by considering diversity of plant species, structural complexity and habitat niches, and food sources for urban wildlife
- Providing for visual and overall sensory amenity across all seasons

## Play Strategy

- Provide small scale play for younger children in residential courtyards
- Cumulative play provision for older children
- Informal play and playful landscape will be considered in the overall public open spaces.

## Masterplan Summary

# PERMEABILITY THROUGH THE SHIPYARD SITE & FLAXMILL PLAZA

## Initial phases of Shipyard Public Realm

### Permeability through the Shipyard site objectives:

- A link from Condell Rd, an invitation into the riverside quarter for pedestrians and cyclists
- A landscaped buffer to the Fernhill residential community, also a bio-diversity corridor
- Mobility Hub - parking for car sharing and charging, bike parking, a sustainable means of Active Travel
- Universal Access - part of North Circular Road (NCR) raised to a level of +5.70 (to provide access above flood scenario).
- Shared green street - vehicles, cyclists and pedestrians on a shared surface
- Streetscape to be a traffic calmed civic space - amenity, natural heritage and water management.
- Shipyard site with a temporary garden offering flood resiliency. Opportunity for public open space as part of the Green Infrastructure Strategy.

1. Environmental canopy, integrated PV
2. Mobility Hub
3. Designated Residential Car Club
4. Ramped shared path, landscape buffer
5. Water feature linked to SUDs in Flaxmill plaza
6. Seating area - food & beverage uses
7. Tree canopies allows for shelter. Alignment of canopy an important green link, raingardens and amenity
8. Flaxmill plaza - city scaled space for flexible uses
9. Raised NCR, shared street design
10. Climate Beacon - chimney to be used to share energy status



# 5 UTILITIES & SERVICES

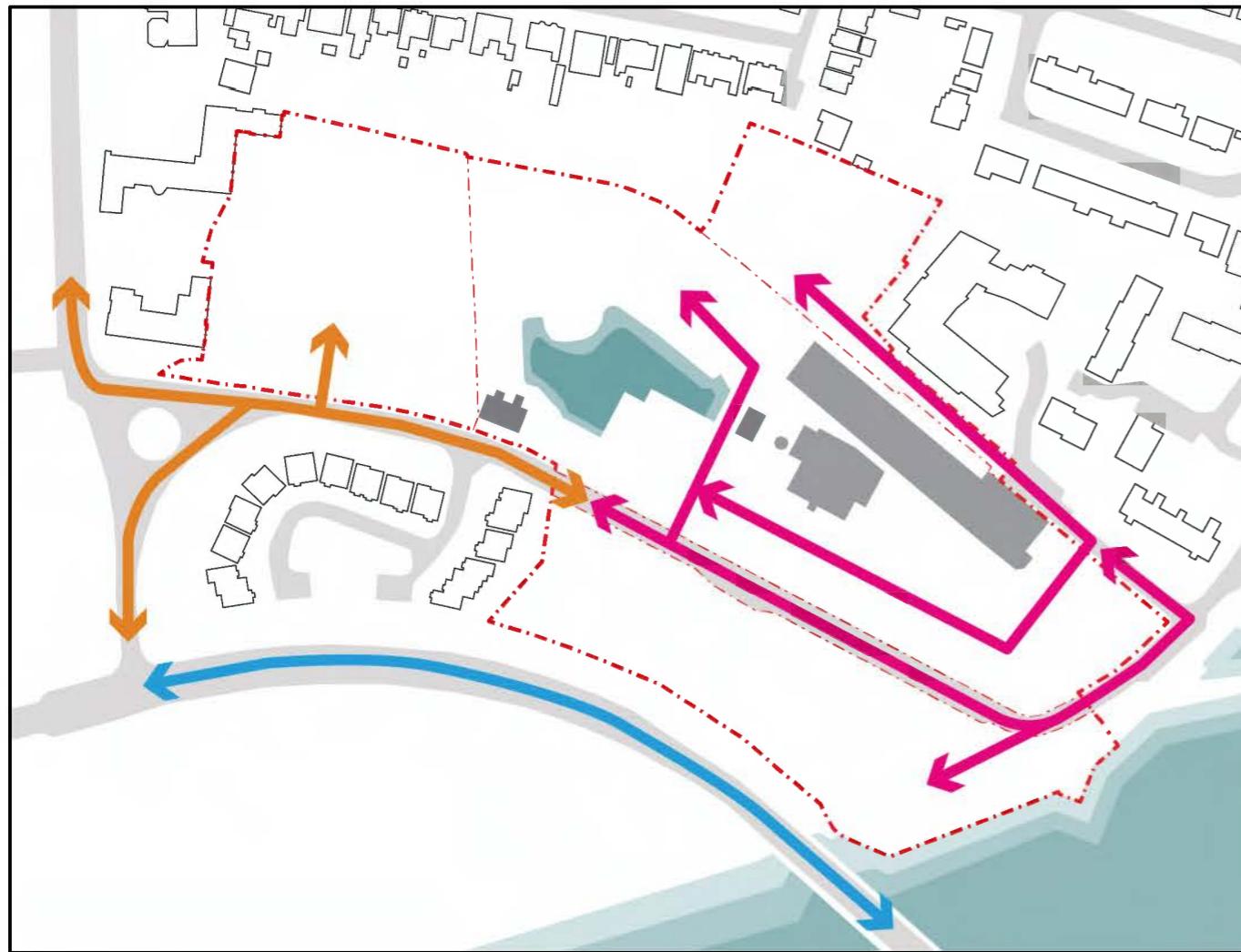


# TOPOGRAPHY AND LEVELS

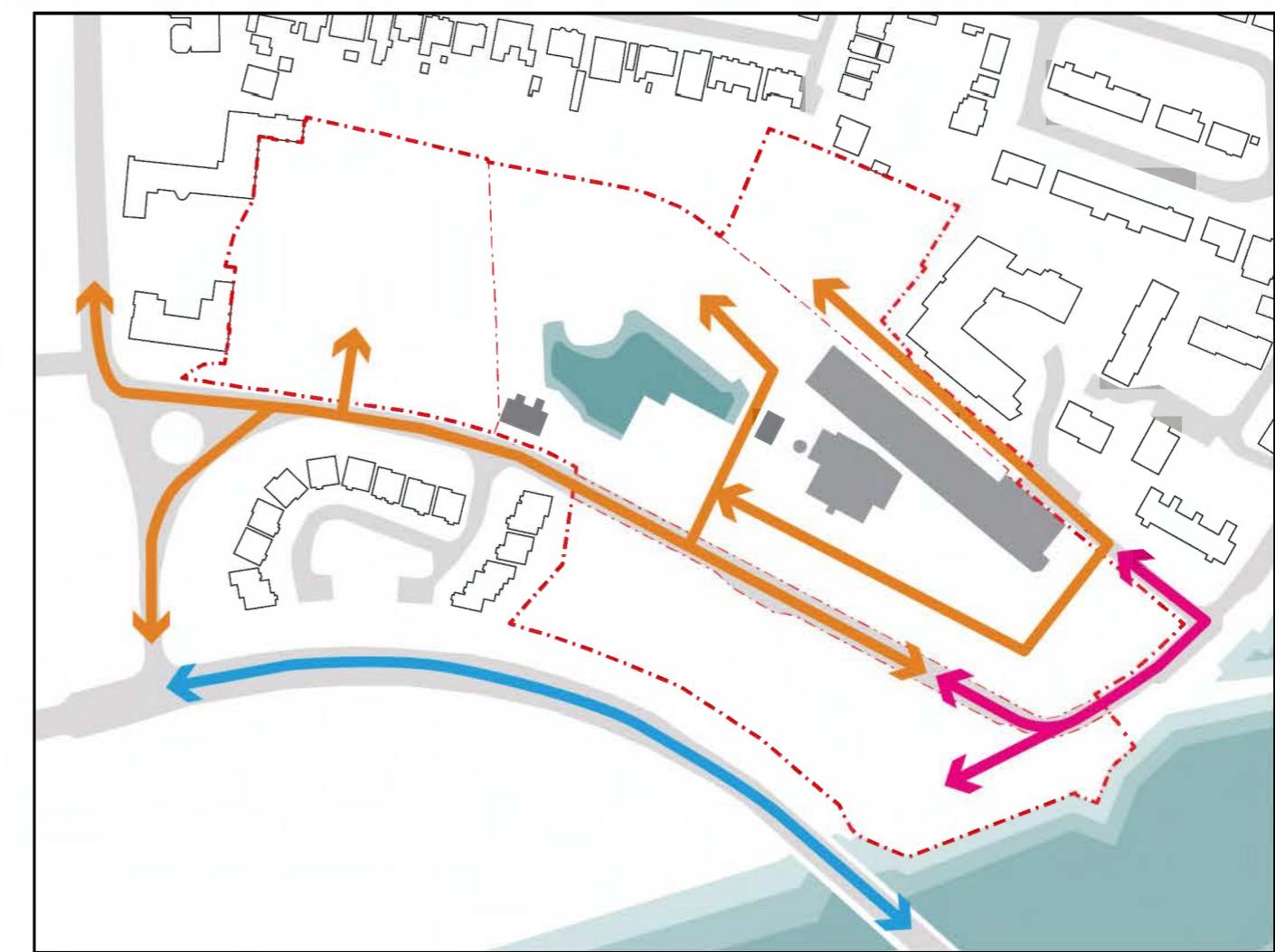
## Future-proofing for flooding

- Raising North Circular to 5.7 AOD - the lowest recommended flood protection allowance is 5.7m AOD and requires the re-grading of the NCR to provide safe access and egress to the Flaxmill, Stonetown Terrace and Quarry site.
- Provide access by the emergency services during the 1 in 200-year flood event, as well as protect the Quarry and Flax Mill sites from tidal flooding.

- Orange Fire tender access route available in a flood
- Magenta Fire tender access route unavailable in a flood
- Blue Secondary fire tender access if required



North Circular at existing level



North Circular raised to 5.40 - 5.70 A.O.D



# SITE SERVICING PROPOSALS



## **ENVIRONMENTAL IMPACT ASSESSMENT REPORT**

### **VOLUME III APPENDICES**

Appendix 4-2 Scoping Responses



**HRA | PLANNING**

HRA | Planning  
3 Hartstonge Street  
Limerick City



Iascach Intíre Éireann  
Inland Fisheries Ireland

06.11.2024

**Re. Cleeves Riverside Quarter – EIAR Scoping**

Dear Mary,

In respect of the above-named planning application, Inland Fisheries Ireland (IFI) has considered the scoping request and has the following observations and recommendations to make.

Given the proximity of the development to the River Shannon and the potential for impacts on the habitat and water quality of the Shannon, this should be a key area of study within the EIAR.

While IFI welcome the inclusion of a suite of SUDs measures in the proposed development, responsibility for the management and on-going maintenance of the proposed structures shall be clearly identified. The building of new grey infrastructure to facilitate water treatment or storage should be avoided and water treated using natural measures. Measures for sustainable use, storage and re-use of rainwater should also be incorporated.

Consideration must be given to the disposal of waste materials such that they will not give rise to discharges to waters. In terms of risk, the placing of soils on watercourse-adjacent ground should not be permitted unless the area has been the subject of a risk assessment. Furthermore, drainage from disturbed and stockpiled soils will have to be considered in advance. It may be necessary to carry out soil stockpiling operations in confined areas only and to ensure vegetation/covering of the soils to prevent wash-out.

Yours sincerely,

*Jane Gilleran*

.....  
Jane Gilleran  
Senior Fisheries Environmental Officer  
Inland Fisheries Ireland - Limerick



National Environmental Health Service  
Health Service Executive  
Ashbourne Hall  
Ashbourne Business Park  
Dock Road  
Limerick

Limerick Twenty Thirty Info  
Gardens International  
Henry Street  
Limerick  
V94 4D83  
Email: [mary.hughes@hrplanning.ie](mailto:mary.hughes@hrplanning.ie)

**Date:** 25/10/2024

**Type of consultation:** EIA Scoping – Consultation Proposed Development at Cleeves Mill, North Circular Road, Limerick City

**EHIS Reference:** 4298

Dear Sir/Madam

Please find enclosed the HSE consultation Report in relation to the above proposal. The following HSE departments were made aware of the consultation request for the proposed development on 21st October 2024.

- Emergency Planning – Kay Kennington
- National Capital Estates Office – Regional AND
- Director of National Health Protection – Eamonn O'Moore/Ina Kelly
- REO Mid-West – Sandra Broderick

If you have, any queries regarding this report please contact, Mr. Andrew Curtin Principal Environmental Health Officer in the first instance.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Andrew Curtin'.

Mr Andrew Curtin  
Principal Environmental Health Officer (PEHO),  
National Health Service Executive Limerick Office



**HSE Submission Report**

**Environmental Health Service Consultation Report**

**(as a Statutory Consultee (Planning and Development Acts 2000) and Regulations made thereunder)**

**Date:** 25/10/2024

**EHIS reference:** 4298

**Report to:** Limerick Twenty Thirty Info, Gardens International, Henry Street, Limerick V94 4D83 Email: [mary.hughes@hraplanning.ie](mailto:mary.hughes@hraplanning.ie)

**Type of consultation:** EIA Scoping – Consultation Proposed Development at Cleeves Mill, North Circular Road, Limerick City

**Applicant:** Limerick Twenty Thirty Strategic Development DAC (LTT) in

**Address of proposed development:** Cleeves Mill, North Circular Road, Limerick City

**Details of the application were circulated to the following HSE stakeholders on the 29<sup>th</sup> October 2024**

- Emergency Planning – Kay Kennington
- National Capital Estates Office – Regional AND
- Director of National Health Protection – Eamonn O'Moore/Ina Kelly
- REO Mid-West – Sandra Broderick

## General Introduction

The following documents should be taken into consideration when preparing the Environmental Impact Assessment Report:

- Guidelines on the information to be contained in EIS (2002), 187kb
- Advice Notes on Current Practice in the preparation of EIS (2003), 435kb
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment

[https://www.housing.gov.ie/sites/default/files/publications/files/guidelines\\_for\\_planningAuthorities\\_and\\_an\\_bord\\_pleanala\\_on\\_carrying\\_out\\_eia\\_-\\_august\\_2018.pdf](https://www.housing.gov.ie/sites/default/files/publications/files/guidelines_for_planningAuthorities_and_an_bord_pleanala_on_carrying_out_eia_-_august_2018.pdf)

EU publication: Environmental Impact Assessment of Projects - Guidance on the preparation of the Environmental Impact Assessment Report, EU, 2017

[http://ec.europa.eu/environment/eia/pdf/EIA\\_guidance\\_EIA\\_report\\_final.pdf](http://ec.europa.eu/environment/eia/pdf/EIA_guidance_EIA_report_final.pdf)

Adoption of the Directive (2014/52/EU) in April 2014 initiated a review of the above guidelines. The draft new guidelines can be seen at:

<http://www.epa.ie/pubs/consultation/reviewofdraftveisguidelinesadvisenotes>

Generally the Environmental Impact Assessment should examine all likely significant impacts and provide the following information for each:

- a) Description of the receiving environment
- b) The nature and scale of the impact
- c) An assessment of the significance of the impact
- d) Proposed mitigation measures
- e) Residual impacts

Directive 2014/52/EU has an enhanced requirement to assess likely significant impacts on Population and Human Health. It is the experience of the Environmental Health Service (EHS) that impacts on human health are often inadequately assessed in EIAs in Ireland. It is recommended that the wider determinants of health and wellbeing are considered in a proportionate manner when considering the EIA. Guidance on wider determinants of health can be found at [www.publichealth.ie](http://www.publichealth.ie)

In addition to any likely significant negative impacts from the proposed development, any positive likely significant impacts should also be assessed.

The HSE will consider **the final EIAR accompanying the planning application** and will make comments to the planning authority on the methodology used for assessing the likely significant impacts and the evaluation criteria used in assessing the significance of the impact.

## Background

Limerick Twenty Thirty (LTT) in conjunction with Limerick City & County Council are preparing an Environmental Impact Assessment Report (EIAR) to support a future planning application for a mixed-use development on lands in Limerick City Centre, known locally as the Cleeves / Salesians School Site, adjoining North Circular Road, Stonetown Terrace and O'Callaghan Strand, in the townlands of Stonetown and Farranshone More.

The planning application will be made directly to An Bord Pleanála under the provisions of Section 175(3) of the Planning and Development Acts 2000 (as amended).

## **Existing Site**

The subject site is located on the northern bank of the River Shannon. The site measuring approximately 4.3 hectares is divided into a number of different portions straddling both sides of the North Circular Road / O'Callaghan Strand. The site comprises Cleeves, a former industrial site which is located east and west of North Circular Road; the Salesians Convent and Secondary School, which is located to the north of the Cleeves site; and St. Michael's Rowing Clubs located between the river and O'Callaghan Strand.

## **Proposed development**

The applicant has advised that the proposed development within the Cleeves site will comprise of a number of separate planning applications and works. The primary development proposal being advanced includes residential and mixed uses with extensive public realm works.

The planning application of the Cleeves Riverside Quarter Masterplan includes the creative re-use of the significant historic structures on the site as well as providing:

- Approximately 230 no. residential units
- Approximately 270 no. purpose built student rooms
- Approximately 1,300sqm of commercial space
- 5,000sqm of educational space
- Meanwhile / temporary uses on the Shipyard site (pending delivery of commercial space in the future)
- Significant public realm with an enriched landscape and riverside

It has been conveyed that significant demolition will also be undertaken on site to facilitate the proposed development, including the whole demolition of the former Salesians Convent and School.

**Generally the Environmental Impact Assessment should examine all likely significant impacts and provide the following information for each:**

- a) Description of the receiving environment
- b) The nature and scale of the impact;
- c) An assessment of the significance of the impact;
- d) Proposed mitigation measures;
- e) Residual impacts.

Directive 2014/52/EU has an enhanced requirement to assess likely significant impacts on Population and Human Health. It is recommended that the wider determinants of health and wellbeing are considered in a proportionate manner when considering the EIA. Guidance on wider determinants of health can be found at [www.publichealth.ie](http://www.publichealth.ie) In addition to any likely significant negative impacts from the proposed development, any positive likely significant impacts should also be assessed.

The HSE will consider the final EIAR accompanying the Planning Application and will make comments to Limerick City and County Council on the methodology used for assessing the likely significant impacts and the evaluation criteria used in assessing the significance of the impact. This report only comments on Environmental Health Impacts of the proposed development. It is based on an assessment of the correspondence submitted to this office.

**The Environmental Health Service (EHS) recommends that the following matters are included and assessed in the EIAR:**

- Public Consultation
- Population and Human Health
- Water (Hydrology and Hydrogeology)
- Land and Soils
- Air, Dust and Odour
- Climate Change and Opportunity for Health Gain
- Noise and Vibration
- Waste Management
- Ancillary Facilities
- Cumulative Impacts Public Consultation

### **Noise & Vibration**

The potential impacts for noise and vibration from the proposed development on all noise sensitive locations must be clearly identified in the EIAR. The EIAR must also consider the appropriateness and effectiveness of all proposed mitigation measures to minimise noise and vibration. A baseline noise monitoring survey should be undertaken to establish the existing background noise levels.

### **Air Quality**

Due to the nature of the proposed construction works generation of airborne dust has the potential to have significant impacts on sensitive receptors. A **Construction Environmental Management Plan** (CEMP) should be included in the EIAR which details dust control and mitigation measures.

### **Ancillary Facilities**

The EIAR should include details of the location of all site office, construction compound, fuel storage depot, sanitary accommodation and canteen, First Aid facilities, disposal of wastewater and the provision of a potable water supply to the site canteen.

### **Cumulative Impacts**

All existing or proposed developments in the vicinity should be clearly identified in the EIAR. The impact on sensitive receptors of the proposed development combined with any other industry/ developments in the vicinity should be considered. The EIAR should include a detailed assessment of any likely significant cumulative impacts of the proposed development.

Arlene Ward.

Arlene Ward  
Environmental Health Officer

Ms Mary Hughes,  
HRA | Planning,  
Limerick,  
3 Hartstonge Street,  
Limerick City.

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Baile Átha Cliath 2, D02 WT20  
Dún Scéine, Harcourt Lane  
Dublin 2, D02 WT20  
t 01 879 8300  
info@nationaltransport.ie  
www.nationaltransport.ie

8<sup>th</sup> November 2024

**Re: Cleeves Riverside Quarter EIAR Scoping**

Dear Ms Hughes,

The NTA makes the following comments in relation to the Cleeves Riverside Quarter EIAR Scoping request. The NTA is working on a number of programmes and plans in relation to public transport and active travel in the Limerick area. The following provides an overview of these plans and programmes which may be of relevance to the development of the subject site.

**CycleConnects**

The NTA has published a draft CycleConnects plan for Limerick. The plan illustrates a primary, secondary, greenway, inter-urban and feeder network for the city of Limerick. The plan indicates that Condell Road, Shelbourne Road Lower and the North Circular Road are part of the urban secondary network for Limerick and may be of direct relevance to the development of the subject site.

**BusConnects Limerick**

The NTA has published a new bus network for Limerick as part of the BusConnects Limerick programme. The new network illustrates the proposed bus routes to serve the city of Limerick. As a result of the implementation of the network, 41% of residents will live within 400metres of a high frequency bus route (running every 15 minutes or better). The proposed network includes route 12 which would directly serve the subject site, while routes 3, 6 and 14 are proposed to serve the Ennis Road.

**Connecting Ireland**

Connecting Ireland is the NTA's programme to address the gaps in connections to local and regional centres in rural Ireland. The proposed Connecting Ireland programme includes expanded and new services in Limerick and Clare which will provide enhanced services to the area and which may benefit the subject site.

**Active Travel Programme**

The NTA Active Travel team is working closely with Limerick City and County Council in the delivery of active travel schemes in the city. While there are no active travel schemes currently being progressed in the immediate area, the subject site, as indicated above is located adjacent to active travel routes contained in the CycleConnects programme and as may be further developed as part of the Limerick City Centre Transport Plan (see below).

### **Limerick Shannon Metropolitan Area Transport Strategy (LSMATS)**

The LSMATS was prepared by the NTA in collaboration with Limerick City and County Council, Clare County Council and Transport Infrastructure Ireland. The Strategy sets out the framework for the delivery of the transport system required to further the development of the Limerick Shannon Metropolitan Area. The LSMATS comprises a comprehensive approach to transport planning in the Limerick Shannon Metropolitan Area for the strategy period.

The LSMTAS contains Measure BC4: Thomond Bridge and Shannon Bridge relating to Shannon Bridge:  
*It is the intention of the NTA and Limerick City and County Council to examine the feasibility of providing priority for bus services using Thomond and Shannon Bridge.*

### **Limerick City Centre Transport Plan (LCCTP)**

The NTA are currently working with Limerick City and County Council to prepare a *Limerick City Centre Transport Plan*. The proposed plan covers the city centre area of Limerick. As the subject site is located in the city centre area, the developing plan may have implications for the subject site. The primary purpose of the proposed Plan is to provide a considered review of the opportunities for change, and to outline proposals as to how the transport networks (by mode) can be developed in line with the objectives, policies and proposals set out in the Development Plan and the Limerick Shannon Metropolitan Area Transport Strategy (LSMATS). As the Plan develops the outcomes may have implications for the subject site.

We hope the above is of assistance in relation to the EIAR scoping and please do not hesitate to contact us in relation to the above if required.

Yours sincerely,



---

**Michael Mac Area**

Head of Strategic Planning

Our Ref: PN24000012894

For the attention of Martin Ryan

Limerick Twenty Thirty  
Gardens International,  
Henry Street,  
Limerick,  
V94 4D83

19<sup>th</sup> November, 2024

By Email: [martin.ryan@limerick2030.ie](mailto:martin.ryan@limerick2030.ie) & [mary.hughes@hrplanning.ie](mailto:mary.hughes@hrplanning.ie)

**Uisce Éireann**  
Bosca OP 6000  
Baile Átha Cliath 1  
D01 WA07  
Éire

**Uisce Éireann**  
PO Box 6000  
Dublin 1  
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**T:** +353 1 89 25000  
**F:** +353 1 89 25001  
[www.water.ie](http://www.water.ie)

**Re: EIA Scoping Request – Relating to proposed Part 10 Mixed Use Development of 230 no. Residential Units; 270 no. Student Bedspaces; Community/Educational /Commercial floorspace and Temporary ‘Meanwhile’ Uses in existing unoccupied buildings at the Cleeves / Salesian School site, adjoining North Circular Road, Stonetown Terrace and O’Callaghan Strand in Limerick City**

Dear Martin Ryan,

Uisce Éireann has received notification of your Environmental Impact Assessment (EIA) scoping request relating to Limerick Twenty Thirty's forthcoming planning application for a mixed use development in Limerick City.

Please see attached, Uisce Éireann's scoping opinion in relation to Water Services. On receipt of the planning referral, Uisce Éireann will review the finalised Environmental Impact Assessment Report (EIAR) as part of the planning process.

Queries relating to the terms and observations above should be directed to [planning@water.ie](mailto:planning@water.ie)

Yours sincerely,

PP Ali Robinson

Signed on behalf of Dermot Phelan

Connections and Developer Services

## Uisce Éireann's Response to EIA Scoping Requests

At present, Uisce Éireann does not have the capacity to advise on the scoping of individual projects. However, in general the following aspects of Water Services should be considered in the scope of an EIA where relevant;

- a) Where the development proposal has the potential to impact an Uisce Éireann Drinking Water Source(s), the applicant shall provide details of measures to be taken to ensure that there will be no negative impact to Uisce Éireann's Drinking Water Source(s) during the construction and operational phases of the development. Hydrological / hydrogeological pathways between the applicant's site and receiving waters should be identified as part of the report.
- b) Where the development proposes the backfilling of materials, the applicant is required to include a waste sampling strategy to ensure the material is inert.
- c) Mitigations should be proposed for any potential negative impacts on any water source(s) which may be in proximity and included in the environmental management plan and incident response.
- d) Any and all potential impacts on the nearby reservoir as public water supply water source(s) are assessed, including any impact on hydrogeology and any groundwater/ surface water interactions.
- e) Impacts of the development on the capacity of water services (*i.e. do existing water services have the capacity to cater for the new development*). This is confirmed by Uisce Éireann in the form of a Confirmation of Feasibility (COF). If a development requires a connection to either a public water supply or sewage collection system, the developer is advised to submit a Pre-Connection Enquiry (PCE) enquiry to Uisce Éireann to determine the feasibility of connection to the Irish Water network. All pre-connection enquiry forms are available from <https://www.water.ie/connections/connection-steps/>.
- f) The applicant shall identify any upgrading of water services infrastructure that would be required to accommodate the proposed development.
- g) In relation to a development that would discharge trade effluent – any upstream treatment or attenuation of discharges required prior to discharging to an Uisce Éireann collection network.
- h) In relation to the management of surface water; the potential impact of surface water discharges to combined sewer networks and potential measures to minimise and or / stop surface waters from combined sewers.
- i) Any physical impact on Uisce Éireann assets – reservoir, drinking water source, treatment works, pipes, pumping stations, discharges outfalls etc. including any relocation of assets.
- j) When considering a development proposal, the applicant is advised to determine the location of public water services assets, possible connection points from the applicant's site / lands to the public network and any drinking water abstraction catchments to ensure these are included and fully assessed in any pre-planning proposals. Details, where known, can be obtained by emailing an Ordnance

Survey map identifying the proposed location of the applicant's intended development to [datarequests@water.ie](mailto:datarequests@water.ie)

- k) Other indicators or methodologies for identifying infrastructure located within the applicant's lands are the presence of registered wayleave agreements, visible manholes, vent stacks, valve chambers, marker posts etc. within the proposed site.
- l) Any potential impacts on the assimilative capacity of receiving waters in relation to Uisce Éireann discharge outfalls including changes in dispersion / circulation characterises. Hydrological / hydrogeological pathways between the applicant's site and receiving waters should be identified within the report.
- m) Any potential impact on the contributing catchment of water sources either in terms of water abstraction for the development (*and resultant potential impact on the capacity of the source*) or the potential of the development to influence / present a risk to the quality of the water abstracted by Uisce Éireann for public supply should be identified within the report.
- n) Where a development proposes to connect to an Uisce Éireann network and that network either abstracts water from or discharges wastewater to a "protected"/ sensitive area, consideration as to whether the integrity of the site / conservation objectives of the site would be compromised should be identified within the report.
- o) Mitigation measures in relation to any of the above ensuring a zero risk to any Irish Water drinking water sources (Surface and Ground water).

*This is not an exhaustive list.*

**Please note:**

- Where connection(s) to the public network is required as part of the development proposal, applicants are advised to complete the Pre-Connection Enquiry process and have received a Confirmation of Feasibility letter from Uisce Éireann ahead of any planning application.
- Uisce Éireann will not accept new surface water discharges to combined sewer networks.
- Where building near / building over / diversions of existing UÉ assets are proposed, the associated designs need to be agreed with the Diversions team in UÉ (prior to formal planning application lodgement) and where appropriate an associated Build Over Agreement / Diversion Agreement executed between the applicant and UÉ . Further details on the process to be followed are outlined on the UÉ website at <https://www.water.ie/connections/developer-services/diversions/>. An associated application form can be downloaded from this location, and it should be submitted, along with associated design drawings, to [diversions@water.ie](mailto:diversions@water.ie). Design proposals are required to be in accordance with UÉ Standard Details and Codes of Practice.



Mary Hughes  
Limerick Twenty Thirty  
Gardens International  
Henry Street  
Limerick, V94 4D83

30 October 2024

**Re: Cleeves Riverside Quarter – EIAR Scoping**

**Your Ref: n/a**

**Our Ref: 24/363**

Dear Mary,

Geological Survey Ireland is the national earth science agency and is a division of the Department of the Environment, Climate and Communications. We provide independent geological information and interpretation and gather various data for that purpose. Please see our [website](#) for data availability.

With reference to your email received on the 14 October 2024, concerning the Cleeves Riverside Quarter – EIAR Scoping, we recommend using our various data sets when conducting the EIAR, SEA, planning and scoping processes for developments, plans and policies. For more detailed information on how to access this data please access 'Data and Maps' [Data & Maps \(gsi.ie\)](#) on our 'Geoscience for planning' webpage. Use of our data or maps should be attributed correctly (please refer to each individual dataset's metadata for correct attribution).

For specific data available for Environmental Assessment and Planning topics please follow this link [[Data by Environmental Assessment and Planning Topic \(gsi.ie\)](#)], where you will find our data arranged by environmental assessment topic as illustrated below:

<b>Land and soils</b> <i>Soil</i> <ul style="list-style-type: none"><li>Subsoils (Quaternary Geology)</li><li>Tellus Geochemistry</li><li>Geotechnical</li></ul> <i>Geology</i> <ul style="list-style-type: none"><li>Bedrock</li><li>Geophysics</li><li>Bedrock &amp; Quaternary 3D</li></ul>	<b>Water</b> <i>Groundwater</i> <ul style="list-style-type: none"><li>Aquifers GW vulnerability, GWPSs (GWPPs)</li></ul> <i>Surface water</i> <ul style="list-style-type: none"><li>Tellus Geochemistry</li></ul> <i>Estuarine &amp; marine waters</i> <ul style="list-style-type: none"><li>Marine and coastal</li></ul> <i>Flooding</i> <ul style="list-style-type: none"><li>GWClimate</li><li>Karst</li></ul>	<b>Climate Change</b> <i>Carbon accounting / Carbon balance</i> <ul style="list-style-type: none"><li>Geothermal</li><li>Carbon capture and storage</li></ul> <i>Climate change trends</i> <ul style="list-style-type: none"><li>National coastal change assessment</li></ul>
<b>Cultural Heritage</b> <i>Archaeology</i> <ul style="list-style-type: none"><li>Cherish</li></ul> <i>Underwater Archaeology</i> <ul style="list-style-type: none"><li>Shipwrecks</li></ul>	<b>Material Assets</b> <i>Built Services</i> <ul style="list-style-type: none"><li>Natural resources (Minerals &amp; Aggregates)</li><li>Active quarries</li></ul>	<b>The Landscape</b> <i>Landscape Appearance &amp; Character</i> <ul style="list-style-type: none"><li>Physiographic units</li></ul> <i>Historical landscapes</i> <ul style="list-style-type: none"><li>Historic mines</li></ul>
<b>Natural (Geo) hazards</b> <ul style="list-style-type: none"><li>Landslide Susceptibility Mapping</li><li>Groundwater flooding</li><li>Coastal vulnerability</li><li>Subsidence</li><li>Radon</li></ul>	<b>Natural heritage</b> <ul style="list-style-type: none"><li>Geoheritage (County Geological Sites)</li><li>Dimension Stone/Stone Built Ireland</li></ul>	



**Other Comments**

Should development go ahead, all other factors considered, Geological Survey Ireland would much appreciate a copy of reports detailing any site investigations carried out. The data would be redacted for confidentiality and added to Geological Survey Ireland's national database of site investigation boreholes, implemented to provide a better service to the civil engineering sector. Data can be sent to the Geological Mapping Unit, at <mailto:GeologicalMappingInfo@gsi.ie>.

If we can be of any further help, please do not hesitate to contact me Clare Glanville, or my colleague Trish Smullen at [GSIPlanning@gsi.ie](mailto:GSIPlanning@gsi.ie).

Yours sincerely,

Dr. Clare Glanville  
**Senior Geologist**  
**Geoheritage and Planning Programme**  
**Geological Survey Ireland**

Trish Smullen  
**Geologist**  
**Geoheritage and Planning Programme**  
**Geological Survey Ireland**

The publicly available data referenced/presented here, should in no way be construed as Geological Survey Ireland support for or objection to the proposed development or plan. The data are made freely available to all and can be used as independent scientific data in assessments, plans or policies. It should be noted that in many cases these data are a baseline or starting point for further site specific assessments.



Outlook

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## RE: Cleeves Riverside Quarter – EIAR Scoping

---

**From** Housing Manager DAU <Manager.DAU@npws.gov.ie>

**Date** Wed 27/11/2024 13:09

**To** Martin Ryan <martin.ryan@limerick2030.ie>

**Cc** Mary Hughes <mary.hughes@hraplanning.ie>

A Chara,

The Department is not in a position to make specific comment on this particular referral at this time. No inference should be drawn from this that the Department is satisfied or otherwise with the proposed activity. The Department may submit observations/recommendations at a later stage in the process and await the outcome of the detailed ecological assessment.

Please note Development Applications Unit (DAU) is the coordinating unit for the Department of Housing, Local Government and Heritage, coordinating responses/submission from National Parks and Wildlife Service, National Monuments Service, Underwater Archaeology Unit and Architectural Heritage.

All Correspondence to be issued to Development Applications Unit.

Regards  
Diarmuid

**Diarmuid Buttmer**  
*Executive Officer*

**An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreachta**  
**Department of Housing, Local Government and Heritage**  
**Aonad na nlarratas ar Fhorbairt**  
*Development Applications Unit*  
**Oifigí an Rialtais**  
*Government Offices*  
**Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90**  
Newtown Road, Wexford, County Wexford, Y35 AP90

---

[Diarmuid.Buttmer@npws.gov.ie](mailto:Diarmuid.Buttmer@npws.gov.ie)  
[Manager.DAU@npws.gov.ie](mailto:Manager.DAU@npws.gov.ie)

---

**From:** Martin Ryan <martin.ryan@limerick2030.ie>  
**Sent:** Wednesday 27 November 2024 12:43  
**To:** Housing Manager DAU <Manager.DAU@npws.gov.ie>  
**Cc:** Mary Hughes <mary.hughes@hraplanning.ie>  
**Subject:** RE: Cleeves Riverside Quarter – EIAR Scoping

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Hi,



Outlook

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**TII Ref: TII24-129077 - Cleeves Riverside Quarter – EIAR Scoping Co. Limerick**

---

**From** INFO <Information@tii.ie>  
**Date** Tue 29/10/2024 11:43  
**To** Mary Hughes <mary.hughes@hraplanning.ie>

**Dear Ms. Hughes,**

Thank you for your correspondence of 10 October 2024, regarding the above, the contents of which have been noted.

Having regard to the inner urban location of the subject site which is at some remove from the national road network in the area, Transport Infrastructure Ireland (TII) has no specific observations to make in relation to the EIAR Scoping exercise.

**Yours sincerely,**

---

**Suzanne Cahill**  
**Regulatory & Administration Executive**

---

**From:** Carolann Quinlan <[carolann.quinlan@limerick2030.ie](mailto:carolann.quinlan@limerick2030.ie)>  
**Sent:** Thursday 10 October 2024 11:15  
**To:** InfoPUBS <[infoDMRB@tii.ie](mailto:infoDMRB@tii.ie)>  
**Cc:** Martin Ryan <[martin.ryan@limerick2030.ie](mailto:martin.ryan@limerick2030.ie)>; Mary Hughes <[mary.hughes@hraplanning.ie](mailto:mary.hughes@hraplanning.ie)>  
**Subject:** FW: Cleeves Riverside Quarter – EIAR Scoping

You don't often get email from [carolann.quinlan@limerick2030.ie](mailto:carolann.quinlan@limerick2030.ie). [Learn why this is important](#)

CAUTION: This email originated from outside of TII. Do not click links or open attachments unless you recognise the sender and are sure that the content is safe.

**Subject:** Cleeves Riverside Quarter – EIAR Scoping

To whom this may concern,

Limerick Twenty Thirty (LTT) in conjunction with Limerick City & County Council are preparing an Environmental Impact Assessment Report (EIAR) to support a future planning application for a mixed-use development on lands in Limerick City Centre, known locally as the Cleeves / Salesians School Site.

The planning application will be made directly to An Bord Pleanála under the provisions of Section 175(3) of the Planning and Development Acts 2000 (as amended).

## **ENVIRONMENTAL IMPACT ASSESSMENT REPORT**

### **VOLUME III APPENDICES**

Appendix 4-3 Masterplan Consultation Report



**HRA | PLANNING**



**Cleeves Riverside Quarter  
Masterplan  
Stakeholder Engagement & Public  
Consultation**

**Statement of Outcomes**

---

September 2023



**HRA | PLANNING**  
chartered town planning consultants

DEVELOPMENT PLANNING | ENVIRONMENTAL PLANNING | MASTERPLANNING

Title:	Stakeholder Engagement & Public Consultation Report	
Project:	20035 CRQMP Cleeves Riverside Quarter Project	
Prepared by:	Mary Hughes MIPI (Director)	
Signed:		
Date:	September 2023	
Issue:	Rev 02	
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## 1.0 INTRODUCTION

### 1.1 Background

The ambition of Limerick Twenty Thirty (LTT) is to revitalise the Cleeves site and surrounding area to deliver a world class proposal in Limerick's urban core. The development seeks to achieve a number of primary objectives:

- supporting the growth of a strong local economy;
- encouraging and facilitating new business investment;
- retaining and integrating the historic buildings and site industrial heritage with contemporary buildings;
- accommodating a mix of uses anchored by a public realm that relates and links to the city core and the River Shannon, whilst implementing high-quality urban design, with sustainable and innovative design.

Once fully developed, the site has the potential to accommodate future population growth through residential unit provision and to further promote a strong local economy through the creation of employment and new local attractions, thereby encouraging and facilitating new business investment.

In response to the requirements of the Limerick Development Plan 2022 – 2028, a masterplan has been prepared to present design solutions that are both sustainable and innovative, that integrate the historic buildings and industrial heritage within the proposed development and include a public realm space that relates both to the urban core and the River Shannon. It provides a broad framework intended to guide and coordinate development across 5 hectares of land. Whilst the masterplan has been prepared as a non-statutory document, it does consider the future of various constituent elements that will be needed to create an exemplar urban quarter that will be an attractive cultural hub destination, offer new gathering spaces for the city and community and act as a catalyst for new models of sustainable urban living and working.

The masterplan essentially provides the framework for Limerick Twenty Thirty's vision for the future and creative re-use of this strategic city centre site and its valuable assets.

### 1.2 Structure of Engagement and Consultation

To inform the preparation and design of the Masterplan, Limerick Twenty Thirty undertook a stakeholder engagement and public consultation process. Meaningful engagement is fundamental to the overall masterplan approach and is intended to:

- Provide stakeholders with the information they need to participate in a meaningful way;
- Assist Limerick Twenty Thirty in understanding their concerns;
- Provide an opportunity for Limerick Twenty Thirty to explain and rationalise the proposed development concept; and
- Advise how and when further public input will be facilitated.

Many different groupings were consulted during the masterplan process including neighbouring residents, sports and recreation groups, educational providers and statutory bodies such as the NPWS, OPW and An Taisce and Limerick City & County Council staff including Conservation Officer, Planners and Senior Management across all departmental types.

The consultation process involved:

- Publication of information boards on the external boundary walls around Cleeves fronting onto North Circular Road;
- The initiation of a formal consultation process to secure submissions on the Masterplan concept, Extensive face to face briefings with key stakeholders.
- Presentation to the Elected Members on the proposed Masterplan.
- A comprehensive media information campaign surrounding the Masterplan designed to generate interest and encourage participation in the Masterplanning process.
- A public information campaign including advertisements, door to door leaflet drops, and an information briefing published for local residents and stakeholders.
- A social media campaign to drive awareness, engagement and attendance across LinkedIn, Facebook and Twitter channels.
- Direct briefings with a selection of community and environmental groups.

### 1.3 This Report

The purpose of the Statement of Outcomes document is to act as a testament to the consultation process and provide an accurate record of feedback received. It presents the findings from the stakeholder engagement and public consultation process. The report has been compiled to analyse the submissions and to summarise the key themes and issues emerging from different groups of respondents. All submissions have been considered thematically with reference to the issues raised;

The statement is presented in seven sections:

- Section 1.0 provides the Introduction.
- Section 2.0 provides an overview of the Masterplan and helps set the context for issues raised in the stakeholder engagement and public consultation process.
- Section 3.0 of the report provides details on the consultation and engagement process and presents a profile of the respondents who made a written submission or engaged with Limerick Twenty Thirty.
- Section 4.0 provides an overview of the issues raised during the engagement and consultation process and details the evolving themes which are addressed in Section 6.0.
- Section 5.0 deals specifically with issues raised by statutory consultees.
- Section 6.0 rationalises and addresses the issues arising under each theme raised by stakeholders and the public. A response is then provided by Limerick Twenty Thirty to each issue / theme raised.
- Section 7.0 concludes the report, providing guidance and direction on potential future engagement and consultation opportunities.

## 2.0 MASTERPLAN VISION & FRAMEWORK

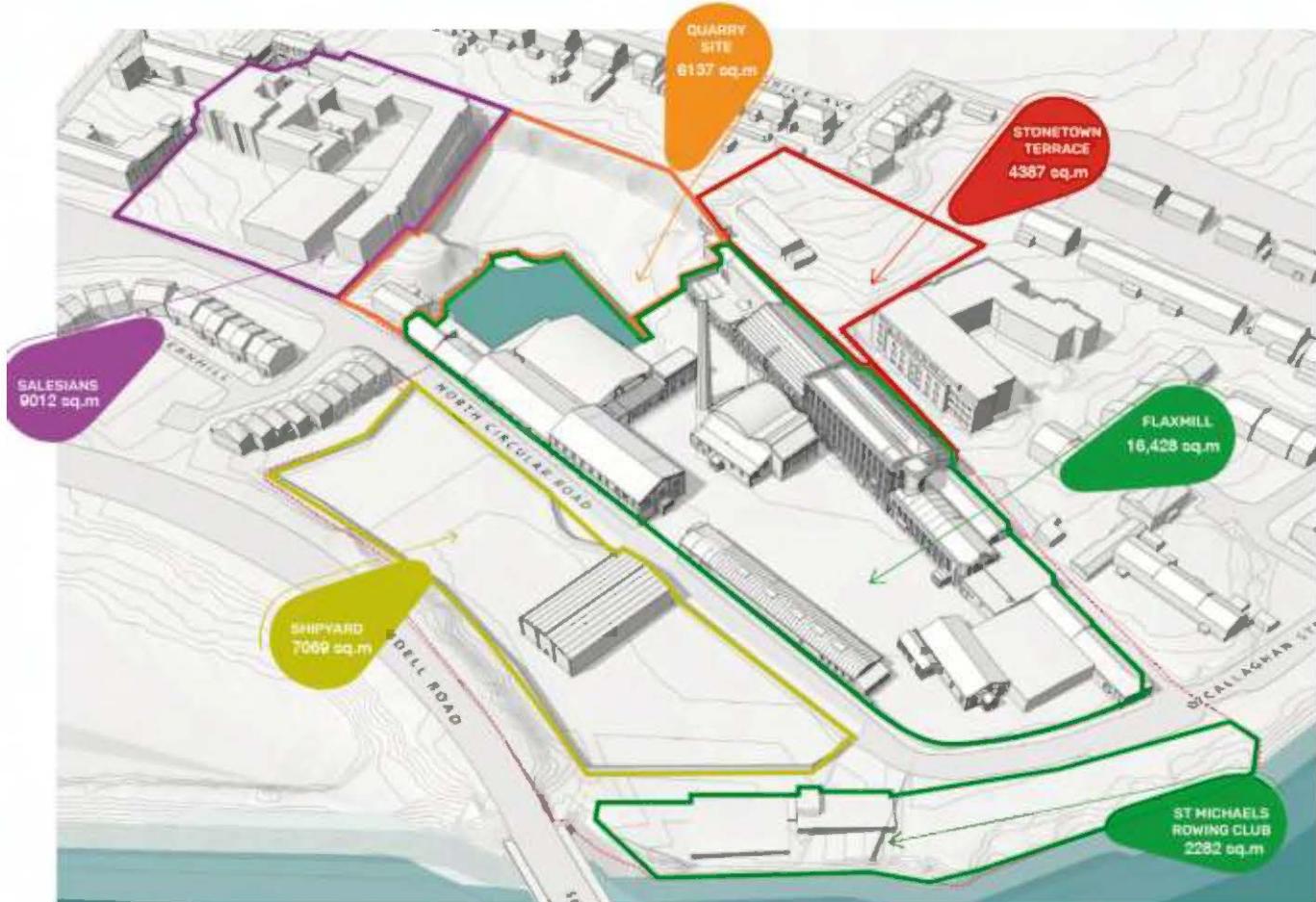
### 2.1 Site Location & Context

The Cleeves site has a unique location, situated to the north-west of the River Shannon, yet also being assigned part of the City Centre Area. The river visually separates the site from the main city which allows it to form a stronger relationship with the immediate context west of the river. Local residential neighbourhoods and educational facilities, public parks and sports facilities, as well as the Westfield Wetlands (part of the SAC) are all comfortably reachable within a 10-25 minute walk.

The site's favourable location adjacent to the Shannon Bridge allows direct access across the river to the city centre, with local facilities along the docks, the hospital and the train station sitting within a 15 minute walk radius. Condell Road which runs past the site into the City Centre is the main route between Shannon Airport and the City itself. Therefore, the site will not only benefit from direct and easy access to the airport but also has the opportunity to form a gateway to the City, welcoming local and international visitors.

The existing character of the riverine landscape has always been an important part of the character of Cleeves, though much has been lost following the walled enclosure of the Cleeves site. There is an opportunity to re-create this link to the river both in terms of opening up the landscape and creating new landmark buildings. There are five distinct but yet permeable areas identified within the overall Cleeves site, each with their unique and distinct character.

The dominant cliff faces of the quarry and the reservoir's breadth of water make this a unique opportunity for an interface of active amenity and biodiversity in the city. The Cleeves scheme will offer distinct spaces that do not replicate the amenities and character of other urban spaces but will complement them. In this way, the Cleeves site is to be seen as a part of a suite of public realm spaces across the city.



**Figure 1.0** Site Context

## 2.2 Vision Framework

An integrated masterplan underpinned by a resilient and phased design approach is proposed, that:

- Enhances engagement with the city and celebrates the rivers' edge by opening up the Flaxmill site to the river, offering a new riverside vantage point, activating the Shipyard site edge with water-

related boating uses. The masterplan responds to the surrounding natural ecosystems and biodiversity, creating an enhanced and accessible public promenade linking O'Callaghan Strand to the Westfields Wetlands.

- Harnesses the value of the unique industrial heritage at Cleeves by organising the Quarter around spaces anchored by the specific heritage elements – Flaxmill buildings and Engine House; Chimney/Water Tank House/Infiltration Galleries; Reservoir/ Quarry, thus amplifying the unique nature of the site and its specific sense of place.
- Creates a vibrant public realm at the heart of the Quarter that links the diverse character areas whilst forming a spine that connects from the Riverside to the Reservoir/ Quarry
- Strengthens connections to the city by an enhanced realm for pedestrians, cyclists and boaters, promoting sustainable modes of movement, with potential for a mobility hub connecting public transport on Condell Road with facilities for shared bikes, scooters etc.
- Creates a permeable and inviting Quarter, enhancing neighbourhood and urban connectivity by pedestrian and visual linkages from Condell Road through to the Flaxmill site and from the upper Salesians and Stonetown Terrace sites to the Reservoir.
- Optimises compact development within the site constraints, whilst respecting visibility of the heritage fabric by concentrating massing away from views of the Flaxmill façade and iconic chimney from the wider context.
- Integrates a diverse and complementary mix of Working, Living and Learning uses, in a public realm offering settings to enable benefits to be gained from synergies between different groups, strengthening a sense of community.
- Provides a Resilient Response to the environmental and climate setting through designing with sustainable initiatives and optimising massing for quality internal and external spaces, with a diverse range of uses.
- Sets out a sustainable incremental phasing strategy with new phased connection routes that enhance the site's dynamic terrain.

### 2.3 Development Concept

The Masterplan has been prepared in response to the requirements for a coordinated and holistic approach to development on the Cleeves Site as detailed in the Limerick Development Plan 2022 – 2028. The development concept as illustrated in Figure 2.0, provides a flexible and phased approach to development. It demonstrates the potential of the site to accommodate a mix of uses with a suggested 60% of the site dedicated to commercial floorspace; 30% dedicated to residential use; and 10% dedicated to mixed use purposes. Importantly, the uses on site can evolve and change over time in response to changing demands and economic conditions.

The site, as considered, has the potential to accommodate:

- Between 240 – 290 no. residential units up to 2028 (current Development Plan period) with further residential capacity beyond that period;
- Between 35,000sqm – 36,500sqm of commercial floorspace; and
- Between 5,000sqm – 6,500sqm of mixed uses

An alternative development concept was also considered which included for student accommodation. That alternative scenario provided for:

- Circa 275 no. student residential bed spaces on the quarry site;
- Between 180 - 220 no. residential units up to 2028;
- Between 35,000sqm – 36,500sqm of commercial floorspace; and

- Between 5,000sqm – 6,500sqm of mixed uses

Alternative options for incorporating residential units on the Shipyard and North Circular Road sites were also considered in the Masterplan process which would increase residential supply on site to 331 no.units.

Further to the creation of a new living and working quarter in Limerick City, Cleeves will also function as a destination for visitors and other city dwellers. The site will link with the river releasing more of the quayside for public use and linking with existing riverside walks. The development will open up to the public with extensive public realm proposals incorporating public uses, new urban streets, park walks and a public plaza, all providing for communal spaces, community hubs and public uses. A generous civic plaza in the forecourt of the historic Flaxmill is pivotal to the overall Masterplan concept, formed and anchored by the heritage buildings. Activated by mixed public uses in the heritage and new buildings on its edges, it offers a strong public focus for the new Riverside Quarter.

Residential use is primarily located on the Salesians, Quarry and Stonetown sites to respond to the neighbouring residential context, with the ground level allocated to mixed use to provide opportunity for an active public realm between the buildings and existing reservoir.

Commercial development is prioritised along the North Circular Road on the Shipyard, Infiltration Gallery and Flaxmill sites.

The massing strategy focuses on optimising compact development whilst respecting the historic context. It seeks to be sympathetic to the surrounding local context whilst engaging with the waterfront and enhancing visibility of the Cleeves site as a landmark development.

The Salesians and Stonetown site to the north respond to the immediate context of low- to mid-rise buildings and the existing Flaxmill building on site, with massing stepping between three and six storeys. South-west of the site on the Shipyard, a new iconic marker is proposed along the riverfront, with the taller element forming a relationship with both the Riverpoint development across the Shannon and the existing Chimney Stack on site.

The Cleeves site is centrally located in Limerick City and is well served by public transport connections. The Masterplan approach for all options has been to reduce on-site car-parking, as supported by national, regional and local policy, in combination with increased parking for bikes. Enhanced connectivity with the established city centre will be promoted and supported, including provision of a proposed new pedestrian bridge extending from the site across the River Shannon, to be delivered as part of the World Class Waterfront Initiative.

Urban Regeneration Development Fund (URDF) funding to the tune of €34.5m will assist in the realisation of the public realm strategy for Cleeves, thereby unlocking the site for development. The committed funding, which must be spent in the short term, demonstrates support for the project and acknowledges alignment of the project with the National Development Plan and Regional Strategy for the Southern Region.

Figure 2.0 may need to be updated following review of quantum of accommodation by FCB

RESIDENTIAL (UNITS)

Quarry*	60 - 70 Units
Stonetown Terrace	40 - 50 Units
Salesians Site	100 - 110 Units
NCR and O'Callaghan Strand**	10 - 20 Units

\*An additional option has been explored to provide circa 275 student residential beds

COMMERCIAL (GIA)

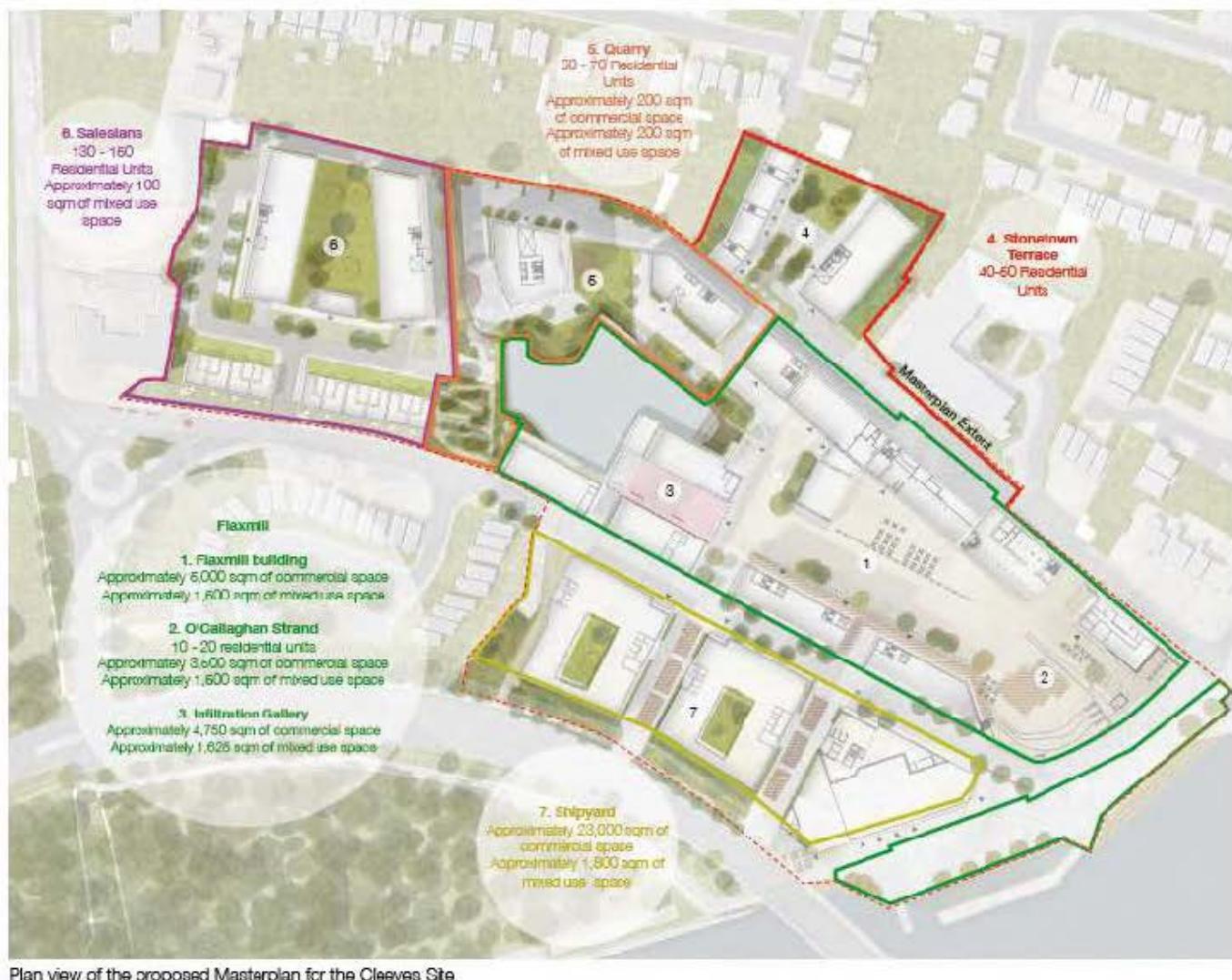
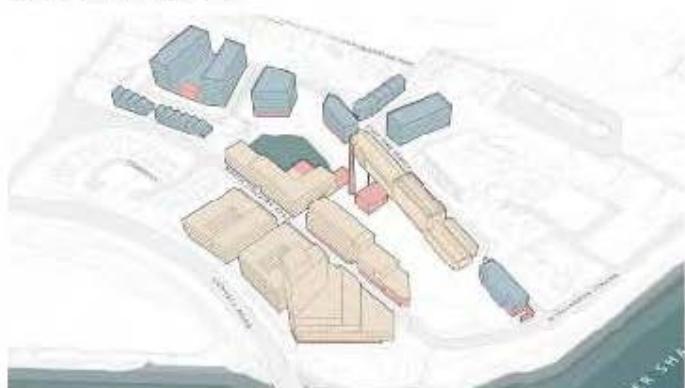
Flaxmill	4,000 - 5,000 m <sup>2</sup>
Quarry	150 - 250 m <sup>2</sup>
Infiltration Gallery	3,600 - 6,000 m <sup>2</sup>
NCR and O'Callaghan Strand **	3,000 - 4,000 m <sup>2</sup>
Shipyard **	22,000 - 23,500 m <sup>2</sup>
Total	35,000 - 36,500 m <sup>2</sup>

MIXED USE (GIA)

Flaxmill	1,200 - 2,500 m <sup>2</sup>
Quarry	150 - 250 m <sup>2</sup>
Salesians Site	90 - 120 m <sup>2</sup>
Infiltration Gallery	1,000 - 2,250 m <sup>2</sup>
NCR and O'Callaghan Strand	1,000 - 2,000 m <sup>2</sup>
Shipyard	1,500 - 2,000 m <sup>2</sup>
Total	5,000 - 8,500 m <sup>2</sup>

\*\*potential other uses have been explored for these sites

Axonometric - Mx of uses



Key of uses across the site

- Live
- Mixed Use
- Commercial

Figure 2.0 Masterplan Development

### **3.0 ENGAGEMENT AND CONSULTATION PROCESS**

A key pillar of the ‘Aarhus Convention’, ratified by the Irish Government in June 2012, concerns Public Participation in Environmental Decision-Making. This requires public authorities to enable the public to comment on proposals for projects, plans and programmes relating to, or affecting, the environment. It also provides that *“Each Party shall provide for early public participation, when all options are open and effective public participation can take place”*. The Aarhus Convention forms a key context within which Limerick Twenty Thirty’s consultation approach was advanced.

#### **3.1 The Approach**

The overriding philosophy of Limerick Twenty Thirty is to manage communications and to proactively disseminate information in a planned and systematic manner, to consult with stakeholders at key stages of the Cleeves project life cycle, and to continuously evaluate the effectiveness of the strategy and make adjustments to increase its effectiveness over all phases.

The objectives of the Stakeholder Engagement and Consultation Process is to:

- Describe the approach to community engagement and stakeholder management for the project; Identify how community engagement and stakeholder management issues pertaining to the proposed development have been managed;
- Identify the main stakeholders, their issues and concerns, influence, and participation levels; and
- Identify key messages to be used in communicating with stakeholders and the project phases where they are likely to be impacted or interested.

Throughout the life of the project, the Stakeholder Engagement and Consultation Process will be regularly reviewed and will continue to be iteratively shaped and adapted to reflect the needs of the community and key stakeholders as the partnership grows and changes and new issues emerge.

It is important to note that the aim of engagement and consultation is not to reach consensus on all issues, particularly considering the diversity and subjectivity of views in development projects. It would be highly unlikely that all groups would reach final agreement on any given issue. Any lack of final agreement does not indicate a weakness in the consultation approach; in fact, a robust consultation process will be strong enough to capture diverse and often contradictory inputs and views, all of which may be considered as part of the consultation.

#### **3.2 The Process**

In designing a consultation process, Limerick Twenty Thirty recognised that one size does not fit all, and that a tailored approach was required if consultation was to be successful. For this reason, a mixture of public consultation and targeted consultation was adopted, including:

- Online Consultation – A dedicated page to Cleeves is facilitated on the Limerick Twenty Thirty website, with relevant background information, a link to information boards, and a Masterplan Submission Form for feedback - <https://limerick2030.ie/portfolio/cleeves-riverside-campus/>
- Open Space Consultation – Recognised as one of the most effective ways to consult with diverse groups, public information and engagement evenings were organized on the Cleeves site with public information boards on initial concepts and designs; a 3-d model of the intended design concept and a QR code to facilitate the making of an online submission. Members of the design

team and Limerick Twenty Thirty representatives were available to engage, discuss and address queries arising.

- Round-table Sessions – A series of round-table sessions with targeted groups was facilitated. Initial concepts were presented, targeted issues were discussed, and feedback was received.
- Pen and Paper Consultations – This approach involved an independent review of the consultation material and a written submission to the project team. The approach was informally used by some members of the public, notwithstanding it was not promoted by Limerick Twenty Thirty.

### 3.2.1 *Briefings & Workshops*

A number of briefings and workshops were undertaken with targeted stakeholders. Written invitations were issued to the following stakeholders, detailing an overview of the project and an invite to meet with the project team -

- Office of Public Works (OPW)
- National Parks & Wildlife Service, Department of Housing, Local Government & Heritage (NPWS)
- Built Heritage Section, Department of Housing, Local Government & Heritage
- Limerick City & County Council Technical Staff (LCCC)
- Limerick City & County Council Senior Management
- Conservation Officer, Limerick City & County Council
- Salesians Primary School
- St. Michael's Rowing Club
- Limerick City & County Council Elected Members
- Limerick City & County Council Forward Planning Section
- Shannon Regional Conference & Sports Bureau
- Discover Limerick DAC

Targeted Group	Event Date	Event Format
OPW	15 <sup>th</sup> February 2023	Site visit, briefing and discussion
NPWS	14 <sup>th</sup> February 2023	Online briefing and discussion
LCCC Technical Staff	19 <sup>th</sup> January 2023	Briefing and Discussion
LCCC Senior Management	09 <sup>th</sup> March 2023	Briefing and Discussion
Conservation Officer, LCCC	08 <sup>th</sup> March 2023	Site visit, briefing and discussion
Salesians Primary School	20 <sup>th</sup> March 2023	On-site briefing and discussion
St. Michael's Rowing Club	28 <sup>th</sup> March 2023	On-site briefing and discussion
LCCC Elected Members	22 <sup>nd</sup> March 2023	Presentation and discussion
Shannon Regional Conference & Sports Bureau	19 <sup>th</sup> April 2023	Briefing and discussion
LCCC Forward Planning Section	05 <sup>th</sup> May 2023	Briefing and discussion
Discover Limerick DAC	06 <sup>th</sup> June 2023	Briefing and discussion

**Table 1.0** Targeted Stakeholder Briefings & Workshops

### 3.2.2 *Public Consultation*

A room within the Flaxmill building was cleared and made suitable to host a public consultation event and to accommodate members of the public. Detailed presentation boards and a 3-d model were prepared as visual aids to encourage and facilitate interaction and discussion.

Two public consultation evenings were facilitated on the evenings of the 28<sup>th</sup> and 29<sup>th</sup> March 2023. Design Team Members and Limerick Twenty Thirty staff were available on the evening to discuss the proposals with the public and address queries.

The events were widely publicised with notices in print media (Limerick Leader and Limerick Post) and online (Limerick Leader and Limerick Twenty Thirty online). A signed letter to neighbours was issued on the 13<sup>th</sup> March 2023 and a mail drop was undertaken to neighbouring residents in Fernhill, Clanmaurice Avenue, Lansdowne Hall and Stonetown Terrace.

Significant numbers attended the event on both nights as illustrated below. A QR code was available to facilitate online submissions.



### 3.2.3 *Media & Publicity*

Further promotional work was undertaken by Limerick Twenty Thirty to raise awareness, encourage debate and facilitate discussion. All social media platforms were used including LinkedIn, Twitter and Facebook to promote the Cleeves site and the preparation of a Masterplan. Two Press Releases were issued, a promotional video was launched online and Limerick Twenty Thirty CEO gave a number of radio interviews

### 3.3 *Written Submissions*

A total of 52 no. written submissions were received from members of the public. The submissions received can be broken down into different categories including:

- 40 no. submissions from the general public;
- 11 no. submissions from groups and associations; Associations, Voluntary Bodies, Sports Groups and Business Associations; and
- 1 no. submission from a statutory consultee.

In the case of submissions from the general public, the majority of submissions were from neighbouring and adjoining residents. In general, all submissions were supportive of the redevelopment of Cleeves and in general welcomed the development. However, issues of density, massing, scale and intended uses were all raised as specific issues.

The submissions from groups and associations included Resident Associations, Voluntary Bodies, Sports Groups and Business Associations. The Voluntary Bodies mainly comprised health and safety organisations operating in the local area, looking for facilities and premises within the development. The Sports Organisations were very much water-based groupings, with an emphasis on canoeing and swimming. Again, these organisations were mostly seeking facilities and premises within the development but also offered interesting potential uses of natural features within the development including the quarry face and infiltration gallery.

The submission from the statutory consultee was An Taisce, primarily concerned with the heritage on site and which is dealt with in detail in Section 5.0 of this Statement.

## **4.0 ISSUES RAISED**

The stakeholder engagement and public consultation process raised a number of similar issues in respect of the Masterplan. In order to avoid undue duplication, it is proposed to group the submissions into themes and to holistically address all issues on a thematic basis. The identified themes with broad brush issues are detailed in Table 2.0 with each theme identified in detail in Section 6.0 of this Statement.

In keeping with Data Protection legislation, individual submissions received will not be published.

Theme	Specific Issues
Residential Use	<ul style="list-style-type: none"> <li>– Need much greater residential provision – 300 units not ambitious enough.</li> <li>– Need a stronger residential quarter within the development.</li> <li>– Need quality living with significant private open space – need family living space not apartments.</li> <li>– Need more innovative apartment layouts with communal spaces and opportunities for working at home.</li> <li>– A gated community aspect should be provided within the development for security purposes.</li> <li>– Need more houses at front of site overlooking the river.</li> <li>– Housing is not noted as a key objective in the Masterplan.</li> <li>– More text on the type and mix of housing to be provided.</li> <li>– Objecting to student accommodation.</li> <li>– No student housing and concern TUC may take over and develop into a third level campus.</li> </ul>
Mixed Uses	<ul style="list-style-type: none"> <li>– Need a greater mix of uses – medical facilities, convenience stores and sports halls.</li> <li>– Too much office space at 36,000sqm which has the capacity to accommodate 2,000 office workers.</li> <li>– Too much new commercial space in the city</li> <li>– Providing 6,000sqm of retail/services space on site will compete with the city centre – vacancy in city centre is already at 16.9% which is too high.</li> <li>– Distribution of mixed uses on site is unbalanced and more mixed uses are required on the shipyard site to facilitate engagement at street level.</li> <li>– Promoting the Pump House as a small Theatre venue is such a good idea.</li> <li>– Need a strong tourism focus.</li> <li>– Industrial Museum should be proposed in the ground floor of Cleeves – need to offer tourist facilities.</li> <li>– Need something like W5 Belfast within the development to attract tourist and facilitate creative space.</li> <li>– Need a Convention Centre</li> <li>– Need to maintain educational use – expansion area required for primary school and Salesians should be kept as educational use.</li> <li>– Need a foodhall / casual dining similar to other cities including Stockholm and Seville.</li> <li>– Need studio spaces for creative people</li> </ul>
Recreational Uses	<ul style="list-style-type: none"> <li>– Maintenance of sporting facilities including Rowing Club very important.</li> <li>– Need more of a connection between the site and the existing River Pathway.</li> <li>– Inclusion of water-based leisure and sporting activities in the masterplanning process and in particular at the reservoir should be considered.</li> <li>– Need to tie in with Active Cities Project – developing amenities and providing opportunities for physical activities.</li> <li>– Need for swimming pool – develop part of the river into a swimming pool.</li> <li>– Should provide for Garden Allotments.</li> </ul>

	<ul style="list-style-type: none"> <li>– Insufficient amenity space</li> <li>– Need a park on the northside like Mungret. Shelbourne Park is not enough.</li> <li>– Need facilities for youths to congregate at night.</li> <li>– Less concrete, more green spaces.</li> <li>– Need more trees in the development – too much concrete and not enough greenery.</li> <li>– Open space needs to be covered – not practical otherwise.</li> <li>– Proposals for a vibrant public area with canopy is very welcome.</li> <li>– Expose the cliff face connecting to the LETSS building complex – this will mean omitting an apartment block and relocating elsewhere.</li> <li>– Use quarry face for rock climbing or as an outdoor cinema.</li> </ul>
Density Height & Massing	<ul style="list-style-type: none"> <li>– Density is too high - gentle density required.</li> <li>– Height of buildings should be maximum four stories.</li> <li>– Buildings should not be higher than the existing Salesians School.</li> <li>– Height should not be greater than Strand Hotel</li> <li>– Buildings not in keeping with heritage of the site or settled nature of the area.</li> <li>– Proposed 16 stories is too high – particularly when this is the only site that can be developed in the O'Callaghan Strand/North Circular Road/Ennis Road area.</li> <li>– Right to Light in afternoons – impact on light in Fernhill</li> <li>– Imposing height on rear gardens in Clanmaurice Ave, causing overlooking and overshadowing and an invasion of privacy.</li> </ul>
Traffic, Mobility & Pedestrian Connectivity	<ul style="list-style-type: none"> <li>– Lack of parking an issue</li> <li>– Increased congestion particularly at Old Westfield and Clanmaurice Ave</li> <li>– Need safe lock up facilities for bicycles.</li> <li>– Roundabout at Shelbourne Road / North Circular Road to be upgraded.</li> <li>– No North Circular Road runs through the campus, is very busy and will result in accidents– need a pedestrian underpass or overpass bus stop in the area to transport people and no car parking on site proposed.</li> <li>– No space provided for public transport.</li> <li>– Need for a Mobility Plan and Traffic Assessment along with a Public Transport Improvement Plan.</li> <li>– Traffic should be omitted from roads and only allow public transport through the site.</li> <li>– Need a pedestrian bridge to connect with the city.</li> <li>– Stonetown Tce should not be used for access to housing identified as Site No.3 – access should be via main site.</li> <li>– Waste trucks currently collect waste bins from outside Fernhill, as waste trucks cannot enter development – this arrangement must be able to continue.</li> <li>– Development must be linked to the rest of the city.</li> </ul>
Sustainability & Climate Change	<ul style="list-style-type: none"> <li>– Must be at the heart of development – building materials, alternative energy etc.</li> <li>– Key focus required on climate change mitigation.</li> <li>– Impact of scale of development on floodplain</li> <li>– What protection is there for Fernhill from flooding.</li> </ul>

	<ul style="list-style-type: none"> <li>– Noise pollution during construction</li> </ul>
Biodiversity	<ul style="list-style-type: none"> <li>– Presence of starlings on site – red listed bird of high conservation concern</li> <li>– No evidence of environmental survey informing the Masterplan</li> <li>– More emphasis on retaining and reinforcing biodiversity is required.</li> </ul>
Built Heritage	<ul style="list-style-type: none"> <li>– Need to consult beyond the Protected Structures Register when deciding what structures and buildings to keep / not to keep.</li> <li>– Need to keep Fernbank House – one of the early original homes on NCR.</li> <li>– Removing the walls around Cleeves is the wrong thing to do.</li> <li>– Defining the boundary of the site is a good thing - examples in Berlin.</li> <li>– Want to keep the existing Cleeves wall without making access to Stonetown Tce.</li> </ul>
Implementation & Delivery	<ul style="list-style-type: none"> <li>– Next stage of masterplan should prioritise the design and delivery mechanism for the housing and identify suitable funding.</li> <li>– No indication of how residential units will be delivered – do not want pension funds etc.</li> <li>– Need European examples of other exemplar projects – the focus should not solely be from the UK.</li> </ul>
Requested Premises & Facilities	<p>The following organisations have requested dedicated premises and facilities:</p> <ul style="list-style-type: none"> <li>~ Ennis Road First Responders</li> <li>~ Shannon Dragons and Shannon Paddlers with specific reference to the reservoir and need for storage facilities and changing rooms.</li> <li>~ Swimming Limerick</li> <li>~ Haven Hub – Suicide Prevention Centre</li> <li>~ Local café operator seeking premises.</li> </ul>
Other	<ul style="list-style-type: none"> <li>– Residents are not listened to.</li> <li>– Residents of Old Westfields not included in 3d model.</li> <li>– Limerick Twenty Thirty Board of Directors – no Councillor representation on the Board form the Ward.</li> </ul>

## 5.0 STATUTORY CONSULTEE SUBMISSION

One submission was made by a statutory consultee, namely An Taisce.

### 5.1 Issues Raised

An Taisce welcomed the Masterplan for the site but considered a stronger residential quarter should be provided. They detailed that attracting people back to live in the heart of Limerick City is necessary for a sustainable, thriving and climate resilient city. They would like to see a focus on climate change mitigation and resilience throughout the design, protection of the natural heritage of the river, and protection of its invaluable public amenity. There should be more of a connection between the site and the River Path and it should remain publicly accessible.

The built industrial heritage should be heralded more and in particular Fernbank House, which is important to the architectural heritage of Limerick city should be retained. An Taisce also seek retention of the boathouse with its unique steel framed structure and spiral cast iron staircase.

The submission notes that the development should be fully served by walking, cycling and public transport give its location in Limerick city. On surface and underground private car parking will induce private car traffic.

## 5.2 Response to Issues

### 5.2.1 Residential Provision

One option in the Masterplan proposes between 240 – 290 no. residential units up to 2028 (current Development Plan period) with further residential capacity beyond that period. The other option proposes circa 275 no. student residential bed spaces on the quarry site, with potential for between 180 - 220 no. residential units up to 2028. The Limerick Development Plan 2022 – 2028 estimates in its Residential Settlement Capacity Analysis that circa 250 no. residential units could be accommodated on the site during the plan period.

The Masterplan has been prepared under the umbrella of national regional and local planning policy. Within the Regional Spatial and Economic Strategy for the Southern Region (RSES) there is a Metropolitan Area Strategic Plan (MASP) for Limerick City. The MASP supports a number of key infrastructure and transformative projects within Limerick City and specifically identifies Cleeves as one of the key strategic sites which will contribute to the transformation of the city. Cleeves is identified as an employment location, suitable for a mix of uses including education, tourism and commercial space. Within the Limerick Development Plan 2022 – 2028 (LDP) Cleeves is identified as one of a number of Strategic Employment Locations in the city (Objective ECON O17). Further Objective CRQ O1 in the Development Plan details that a number of requirements in any redevelopment proposal on the site must provide for “*a high-quality urban design solution with a mix of uses*”.

Thus, the site has been identified at regional and local level for primarily employment uses. It is therefore important that the site is not overtly residential in nature and that a focus is maintained on employment uses and mix in order to satisfy regional and local policy. However, as policy changes and the site evolves, further provision for residential use on the site can be accommodated in certain locations, and following a revision of the Core Strategy as currently detailed in the Limerick Development Plan 2022 - 2028

### 5.2.2 Climate Change Mitigation

A sustainable development starts with the community, creating a neighbourhood that encourages and enables a low-impact lifestyle. This approach naturally incorporates climate change measures into the development from the outset. The environmental strategy seeks to adopt:

- Fabric-first principles to minimise heat loss.
- Solar design to maximise beneficial solar gains, and reduce overheating.
- Green roofs providing extensive on-site biodiversity.
- Sheltered outdoor spaces to enable year-round use.
- Climate beacon chimney shifts colour according to energy status of site.
- Environmental canopies provide protection from rain and wind while generating energy with solar PVs. and
- Efficient and low carbon materials prioritised to reduce embodied carbon.

The Masterplan approach embraces operational and embodied carbon emissions, including the construction, replacement and maintenance cycles and what happens to the building at the end of its life. The Sustainability Statement and Approach is set out in Section 9 of the Illustrative Masterplan.

#### *5.2.3 Protection of the River*

The existing character of the riverine landscape has always been an important part of the character of this site, though much has been lost following the walled enclosure of the Cleeves site. The Masterplan proposes to re-create this link to the river through opening up the landscape for use by the wider public, as well as improving public access to the waterfront through a riverside promenade, which can link with the existing River Path via a connected route under the Condell Road.

An AA Screening report was prepared to assist determination as to whether the proposed development is likely to give rise to potential for significant effects on the Natura 2000 network that would cause a requirement to undertake 'Appropriate Assessment', specifically the Lower River Shannon cSAC (Site code 002165) and the 'River Shannon and River Fergus Estuaries' SPA (site code: 004077).

The report confirms that whilst the project is unlikely to result in direct effects by way of loss or fragmentation of the Natura 2000 network, the potential for secondary indirect effects by way of water quality issues, cannot be ruled out without further assessment and consideration of mitigation practices. This assessment thus recommends Stage 2 Appropriate Assessment, which shall be undertaken at project specific stage.

#### *5.2.4 Built Industrial Heritage*

Conservation is often referred to as a process of 'managing change'. In order to inform the masterplan principles for an approach to the heritage buildings, the significance of each building on the Flaxmill and Shipyard sites has been undertaken. The conservation objective has been to preserve one of the most significant flax mills in Northern Europe for new life; enhance the industrial axis with a new transformative programme of cultural, education, commercial and residential uses; and strengthen the site's relationship with the water. The Vision Document has been informed by a detailed Statement of Significance relating to the heritage buildings on site, which have been classified into high, medium, low and negative significance. This Statement of Significance has informed the overall reuse strategy for the site.

Deemed to be of 'medium significance' in the Statement of Significance, there is a proviso that Fernbank House could be deemed more important once its history is better known. The public consultation has provided significant additional information on Fernbank House, which will need to be assessed as the Masterplan progresses to the next stage.

Presently, it is proposed to demolish the two houses fronting onto North Circular Road to enhance accessibility and movement within the proposed masterplan development and to facilitate linkages with the existing Fernhill residential development. The proposed connectivity and access strategy at this location strives to provide direct linkages to the quarry area which is to be developed as a significant amenity area not only to serve the proposed development, but also the wider area. There is a significant level difference at the location of Fernbank House and connectivity at this point can only be achieved with the removal of the house, in order to facilitate steps and a ramped access providing access from North Circular Road to the proposed amenity area.

With respect to the boathouse, a balance needs to be struck between opening up the rivers edge for the benefit of the greater good, facilitating permeability and increasing connectivity with the Wetlands. The aim

of the masterplan is to bring people into contact with the river, enabling engagement with the water and create space for water sports, and gatherings. The existing boathouse occupies almost the totality of the waterfront fronting Cleeves and without its removal, this part of the waterfront will remain effectively in private use, with little opportunity to increase connectivity under the Condell Road.

#### 5.2.5 *Traffic*

The Masterplan design is focused on the provision of high-quality spaces for pedestrian movements, thus enhancing the attractiveness of this travel mode among residents and visitors. Its close proximity to the city facilitates walking and cycling trips, with a proposed new pedestrian/cycle bridge further increasing this connectivity with the city centre.

Short-stay and long stay cycle parking will be accommodated on site and in particular will cater for the convenience needs of visitors, with small clusters of cycle stands located in highly-visible locations close to building entrances.

Residential car parking will be provided at limited numbers across the site in an average ratio of 0.42 spaces per unit. This is consistent with LCCC's car parking policy and with the development ethos, which strives to discourage the use of cars as a regular travel mode. Similarly, office car parking will also be provided at a limited quantum. The development will include the accommodation of shared mobility options, including a residential car club which would provide a number of car-sharing spaces for private use of the residents, and the potential expansion of the city-wide TfI (Transport for Ireland) Bikes or emerging dockless bike or e-scooter schemes.

The closest local bus stops to the site are located northeast of the site, along the R45 Ennis Road, accessible by a 6-minute walk. A submission has been made to the National Transport Authority in respect of the proposed BusConnects proposal for Limerick City, seeking provision of a bus stop on the Condell Road to serve the development proposal.

## 6.0 THEMATIC ISSUES

### 6.1 Residential Use

- Need much greater residential provision – 300 units not ambitious enough.
- Need a stronger residential quarter within the development.
- Need quality living with significant private open space – need family living space not apartments.
- Need more innovative apartment layouts with communal spaces and opportunities for working at home.
- A gated community aspect should be provided within the development for security purposes.
- Need more houses at front of site overlooking the river.
- Housing is not noted as a key objective in the Masterplan.
- No text on the type and mix of housing to be provided.
- Objecting to student accommodation.
- No student housing and concern TUC may take over and develop into a third level campus.

The need for greater housing provision in Limerick City is recognised by Limerick Twenty Thirty. However, the provision of housing and the national objective to provide for compact growth in our cities, needs to be balanced with the policy objectives for the site established at regional and local level. As already detailed in Section 5.2.1, Limerick Twenty Thirty has had to balance the provision of residential and employment

uses on the site given identification of the site as a Strategic Employment Location in the Regional Spatial and Economic Strategy for the Southern Region (RSES) and the Limerick Development Plan 2022 – 2028. It is considered that the site may have potential for additional housing following either a revision of the core strategy for the city and / or the current plan period, post 2028. Alternative options for incorporating residential units on the Shipyard and North Circular Road sites were also considered in the Masterplan process which would increase residential supply on site to between 270 – 325 units.

National Policy Objective 10 as set out in the National Planning Framework (NPF) promotes compact growth which means higher densities in our towns and cities. In response to this objective, the Limerick Development Plan 2022 – 2028 specifies that city centre sites, such as the subject site, accommodates minimum densities of 100 units per hectare. An apartment unit is the only unit typology capable of achieving such densities. There is significant ‘family living space’ on adjoining neighbouring sites comprising detached and semi-detached units. The proposed apartment typology will facilitate mixed housing provision in the area. Although the unit mix has not yet been defined (this will be defined at planning application stage), there are different ways to live at Cleeves Riverside Quarter, possibly with outright purchase, low -cost sale schemes, shared ownership, and opportunities for both social and private renting. Each phase of the development will include a variety of accommodation from one and two bed apartments up to three bed family townhouses. The possibility for student residential use has also been explored.

The Development Plan and Urban Design Manual: A Best practice Guide promotes connectivity and linkages within and between developments. The provision of a ‘gated community’ type development would contravene these principles and would not be acceptable from a proper planning and sustainable development perspective. The intent from the outset has been to open the Cleeves site to the city and to the general public, to effectively re-link the site to the water’s edge.

The Masterplan does provide for some residential units to the front of the site overlooking the river on the northern boundary opposite Stonetown Terrace. However, a balance needs to be struck in managing the provision of residential uses on site and the flooding extents which currently characterise the site. However, it is noted that the Limerick Flood Relief Scheme will positively benefit the site in the future and is likely to significantly mitigate future flood risk to the site. Along with balancing the flood risk, it was also considered that commercial / mixed uses proposed at ground floor level would provide for more activity and vibrancy within the central open areas and public realm fronting the river. In the future, following implementation of the flood relief scheme for Limerick and following the preparation of a new development plan for the city in 2028, consideration could be given to further residential uses overlooking the river.

As detailed in Section 2.3 of this report, consideration has been given to a further mix of residential units on site with the introduction of student housing. It was considered that, dependent on the final uses proposed for the Flaxmill Building and other community / mixed use areas, student housing could complement possible educational uses, including potential educational uses arising from the Memorandum of Understanding with the Technological University of the Shannon Midlands Midwest (TUS).

## 6.2 Mixed / Commercial Uses

- Need a greater mix of uses – medical facilities, convenience stores and sports halls.
- Too much office space at 36,000sqm which has the capacity to accommodate 2,000 office workers.
- Too much new commercial space in the city
- Providing 6,000sqm of retail/services space on site will compete with the city centre – vacancy in city centre is already at 16.9% which is too high.

- Distribution of mixed uses on site is unbalanced and more mixed uses are required on the shipyard site to facilitate engagement at street level.
- Promoting the Pump House as a small Theatre venue is such a good idea.
- Need a strong tourism focus.
- Industrial Museum should be proposed in the ground floor of Cleeves – need to offer tourist facilities.
- Need something like W5 Belfast within the development to attract tourist and facilitate creative space.
- Need a Convention Centre
- Need to maintain educational use – expansion area required for primary school and Salesians should be kept as educational use.
- Need a foodhall / casual dining similar to other cities including Stockholm and Seville.
- Need studio spaces for creative people.

The development options advanced in the Masterplan, as detailed in Section 2.3 of this report, provides for significant commercial and mixeduse space within the Cleeves site. Justification for the commercial floorspace has already been detailed in response to the An Taisce submission (Section 5.2.1) and under Residential Use (Section 6.1). Essentially the site has been identified as a Strategic Employment Location in the Regional Spatial and Economic Strategy for the Southern Region (RSES) and the Limerick Development Plan 2022 – 2028 and therefore must accommodate a significant quantum of commercial / mixed use, employment generating floorspace.

The specific intended use for the mixed use floorspace has not been determined as part of the Masterplan and will be subject to ongoing discussion as development progresses on the site and a planning application is prepared. Limerick Twenty Thirty has consulted extensively on the use of the site including consultations with the Technological University of the Shannon Midlands Midwest (TUS); Shannon Regional Conference & Sports Bureau; Discover Limerick DAC; and St. Michaels Rowing Club. The public has detailed some potential uses for mixed use areas within the site, which could be accommodated in the future, but which is dependent on future operating and funding considerations. At this stage, the important consideration is the balance of uses proposed across the site, which can be adapted in the future as the need and demand from operators arise.

Consultation has been undertaken with Salesians Primary School with respect to their spatial requirements and shall continue during the development process, until a clearer understanding of all constraints and opportunities are understood. The Salesians Primary School will remain in operation as a school. This is a 2-3 storey building which directly abuts the site boundary. Provision has been made for 30 no. grade parking spaces for the primary school teachers, which has been integrated into the Masterplan Options.

In consideration of the uses on site, regard must be had to the city centre location and city centre zoning afforded to the site. Whilst it is not the intent of the site to compete with the traditional city centre from a retail and services perspective, nonetheless a level of retail and service use shall be required to accommodate and support a vibrant and active community at this location. As stated in the submissions received, foodhalls, casual dining and cafés shall be required.

### 6.3 Recreational Uses

- Maintenance of sporting facilities including Rowing Club very important.
- Need more of a connection between the site and the existing River Pathway.
- Inclusion of water based leisure and sporting activities in the masterplanning process and in particular at the reservoir should be considered.

- Need to tie in with Active Cities Project – developing amenities and providing opportunities for physical activities.
- Need for swimming pool – develop part of the river into a swimming pool.
- Should provide for Garden Allotments.
- Insufficient amenity space
- Need a park on the northside like Munget. Shelbourne Park is not enough.
- Need facilities for youths to congregate at night.
- Less concrete, more green spaces.
- Need more trees in the development – too much concrete and not enough greenery.
- Open space needs to be covered – not practical otherwise.
- Proposals for a vibrant public area with canopy is very welcome.
- Expose the cliff face connecting to the LETSS building complex – this will mean omitting an apartment block and relocating elsewhere.
- Use quarry face for rock climbing or as an outdoor cinema.

A Landscape Strategy including a review of Limerick's civic spaces and public parks was undertaken to inform the Vision Document. The strategy identified that there is limited amenity on the northern side of the River Shannon. Whilst the subject site will not be able to address all recreational deficiencies in the area, it can facilitate significant soft and hard public open space, for the benefit of existing and proposed new residents.. The amenity potential of the quarry and reservoir area will have a mix of active and passive uses and will primarily comprise of soft / green landscaping. This area is a space for the city, and supports the amenity spaces for the residential areas of Stonetown Terrace, Salesians, and the Quarry. In contrast, the area around the Flaxmill and Riverfront are harder and more civic in use and provide opportunities for city-scale events and water-based activities.

The aim is to leave the space in front of the sunlit Flaxmill façade open in order to give space for the building to stand out. This will also offer a flexible space for events in the middle, with café terraces along the sunlit edge. The North facing side of the Flaxmill plaza will be populated with seating, trees and planters, still allowing a free movement through the space. Trees and planting also offer wind protection from the South-West winds.

The Quarry area, with its dramatic walls and reservoir form a unique space in the city. Both the reservoir and the quarry walls enclosing the space define its unique character and will remain visually connected within the open space of the quarry area, and through to the Flaxmill. The masterplan also opens up a new view from the Flaxmill Square across the reservoir to the quarry walls. Exposing the cliff faces is an integral part of the design proposal as it reflects the heritage of the area. The quarry area is a sun trap sheltered from the wind, making a warm, sheltered - and quite rare- microclimate in Limerick. A public park, including a play space with a special character relating to the cultural and natural heritage of the site is provided in the area with opportunities for more activities including wall climbing.

It is acknowledged that shelter in the public realm is important to encourage use, and to offer shelter from the weather: The Vision document explores different shelter options and provides potential options including a solar energy collecting canopy which creates a transition space between the Flaxmill space and the riverside, offering a venue for gathering, viewing of water events, pop-up seasonal water related activities etc. Opposite the Flaxmill an overhang offers a place of shelter from which to view events in the main space, and a sheltered route to the reservoir space beyond.

Many important considerations have been raised in the submissions received, with a particular emphasis on water sports. There is potential accommodation for St. Michaels Rowing Club on the Shipyard site, incorporating boat storage at the riverside level, facilitating access to the water and existing pontoon, whilst releasing more of the quayside for public use. Boating activity at this location will activate the riverside walk and facilitate a connection between the pedestrian promenade on O'Callaghan Strand and the walkway at Westfields wetlands. Above, with connection from the Condell Road, a viewing terrace overlooking the river will offer access to the training and social areas of the rowing club. The eastern end of the Flaxmill space opens up to the river's edge, with large seating steps for riverside viewing (boat races etc).

In addition to accommodating St. Michael's Rowing Club, around the Quarry side of the reservoir, communal spaces open onto a south facing stepped edge and boardwalks along the waterside. The reservoir could potentially be used for many different recreational facilities including watersports.

Above the Infiltration Galleries, a shared covered space allied with a community hub space overlooking the reservoir, offers a venue for gatherings or informal events (a possible place for the youth). Vertical connections along the west edge of the water tank house could offer access to the brick arched galleries beneath.

#### 6.4 Density Height & Massing

- Density is too high - gentle density required.
- Height of buildings should be maximum four stories.
- Buildings should not be higher than the existing Salesians School.
- Height should not be greater than Strand Hotel
- Buildings not in keeping with heritage of the site or settled nature of the area
- Proposed 16 stories is too high – particularly when this is the only site that can be developed in the O'Callaghan Strand/North Circular Road/Ennis Road area.
- Right to Light in afternoons – impact on light in Fernhill
- Imposing height on rear gardens in Clanmaurice Ave, causing overlooking and overshadowing and an invasion of privacy.

The Building Height Strategy for Limerick, as contained in the Development Plan, promotes increased building height at Cleeves. The strategy states that '*taller, landmark, gateway and city landmark buildings as defined in the 'Tall Building Classifications', are appropriate*'. However, it does acknowledge the lower scale of buildings predominant in the area. In response to this the strategy states "*It is recognised that there may be an impact on neighbouring residential buildings as the height is generally lowline in the surrounding area. However, there is a high quality townscape and placemaking argument which can be deemed appropriate for an area of height due to the nature of the site.....*"

The massing strategy proposed in the Masterplan is sympathetic to the surrounding local context whilst engaging with the waterfront and enhancing the visibility of the Cleeves site as a landmark development. The Salesians and Stonetown site to the north respond to the immediate context of low- to mid-rise buildings and the existing Flaxmill building on site, with massing stepping between 3 and 7 storeys. To the south-west of the site on the Shipyard, a new iconic marker is proposed along the riverfront forming a relationship with both the Riverpoint development across the Shannon and the existing Chimney Stack element on site.

National Policy Objective 10 as set out in the National Planning Framework (NPF) promotes compact growth which means higher densities in our towns and cities. Further, the Urban Development and Building Height Guidelines for Planning Authorities 2018 provide support for taller buildings and highlight the importance of facilitating taller buildings, particularly proximate to city centres. In response to this objective, the Limerick Development Plan 2022 – 2028 specifies that city centre sites, such as the subject site, accommodates minimum densities of 100 units per hectare. Accordingly, the development must proceed with higher densities, in contrast to prevailing densities in the area and in accordance with the requirements in the Development Plan provides residential uses on site at a rate of circa 133 units per hectare.

The Development Plan focuses delivery of tall buildings in the City Centre, with tall building clusters encouraged on the Cleeves site (Objective CGR O9). For the purposes of the Masterplan, the following heights have been considered:

- The Townhouses along the North Circular are 3 storeys high to reflect the immediate residential scale in this location. The residential blocks at the upper level of the site (Salesians site) are 7 storeys (undercroft parking plus 6 levels of living), aligned along a North/South axis to minimise overlooking and overshadowing, whilst allowing light through to the rear gardens of Clanmaurice Avenue.
- Within the quarry site in front of the reservoir there are two blocks of 5 storeys (commercial at L00) plus 4 storeys of residential above) and 7 storeys (commercial at L00 and 6 storeys of residential above). These blocks are framed by the high quarry wall to the rear and the long rear gardens of Clanmaurice Avenue which ensures no overlooking / overshadowing of residential units occurs.
- On the Stonetown Terrace site, the residential proposal provides a 3 storey residential block with an apartment at ground floor level and duplex units above. A 5 storey residential block (undercroft parking at L00 and residential above) is aligned along a North/South axis to the rear of Lansdowne Hall.

Whilst overlooking distances and overshadowing distances have been considered when setting out the height, scale and locations of the proposed residential blocks, central to the consideration of taller buildings on the site will be assessments including the micro-climatic effects, down-draught and amenity considerations including daylight and sunlight. These detailed studies will be undertaken at planning application stage and will ultimately dictate the height of buildings on the site.

Fernhill and Rosehill Residential Developments have been considered whilst developing the Masterplan to minimise negative impacts that new developments may cause, but also to integrate them into the development proposal by providing direct access from the quarry and reservoir site through to North Circular Road. A garden linking Condell Road to the North Circular Road offers a green buffer to the Fernhill residences. The office building form steps from 4 to 6 to 8 storeys, rising towards the Shannon bridge to form a landmark 16 storey tower at the waterfront, a gateway to the city.

## 6.5 Traffic, Mobility & Pedestrian Connectivity

- Lack of parking an issue
- Increased congestion particularly at Old Westfield and Clanmaurice Ave
- Need safe lock up facilities for bicycles.
- Roundabout at Shelbourne Road / North Circular Road to be upgraded.
- No North Circular Road runs through the campus, is very busy and will result in accidents– need a pedestrian underpass or overpass bus stop in the area to transport people and no car parking on site proposed.
- No space provided for public transport.
- Need for a Mobility Plan and Traffic Assessment along with a Public Transport Improvement Plan.

- Traffic should be omitted from roads and only allow public transport through the site.
- Need a pedestrian bridge to connect with the city.
- Stonetown Terrace should not be used for access to housing identified as Site No.3 – access should be via main site.
- Waste trucks currently collect waste bins from outside Fernhill, as waste trucks cannot enter development – this arrangement must be able to continue.
- Development must be linked to the rest of the city.

Having regard to the ambitious targets which are set out in the Climate Action Plan for the transport sector, Limerick will see a significant transition to sustainable and active modes of travel in the coming years. The transport approach and strategy for the Cleeves site has been carefully considered and is being driven by existing policies at national, regional and local level. The Masterplan design is focused on the provision of high-quality spaces for pedestrian movements, thus enhancing the attractiveness of this travel mode among residents and visitors. Its close proximity to the city facilitates walking and cycling trips, with a proposed new pedestrian/cycle bridge further increasing this connectivity with the city centre. The overall approach therefore is to focus on sustainable modes of transport. Any alternative approach would not conform with current thinking and policy.

Two primary vehicular access points will be provided into the Cleeves site with separate access facilitated to the Shipyard site off the North Circular Road. The Salesians site will be accessed via a new access off North Circular Road, located in between the terrace of three storey housing units fronting onto the road. The second access will be provided off O Callaghan Strand to the proposed residential units in Stonetown Terrace. Stonetown Terrace is an elevated site and the significant levels difference means that vehicular access cannot be provided directly from the Flaxmill site. Pedestrian access only will be facilitated between the Flaxmill, Quarry and Stonetown Terrace sites. It is envisaged that this vehicular access will serve circa 40 – 50 units with provision for circa 27 no. car parking spaces only, thereby limiting the vehicular movement on this access route.

The Limerick Development Plan indicates reduced car parking provision for city centre sites, whilst the Design Standards for New Apartments requires increased provision of bike parking. Final provision will be subject to design development, but bike parking will be provided in excess of the minimums set out in the Development Plan, through a mix of short-stay and long-stay facilities covered and secure facilities.

A Sustainable Mobility and Movement Strategy to optimise, accessibility and connectivity is proposed. Prioritising pedestrian and cycling permeability and movement between the site and the city and within the site areas, with consideration for potential new pedestrian bridge. The closest local bus stops to the site are located northeast of the site, along the R45 Ennis Road, accessible by a 6-minute walk. A submission has been made to the National Transport Authority in respect of the proposed BusConnects proposal for Limerick City, seeking provision of a bus stop on the Condell Road to serve the development proposal.

Residential car parking provided in combination of surface and undercroft parking at an average ratio of 0.42 spaces per unit across the site, with office car parking provided in combination of surface and underground parking at 1 space per 240m<sup>2</sup> across the site (majority on the Shipyard site). Some 20 no. Car Club spaces are proposed within the overall development with a Mobility hub provided on the Shipyard site with access off Condell Road. The Mobility Hub serves the commercial and mixed-use areas on the Cleeves Site.

Less car parking on site will control the level of traffic generated by the proposed development. Potential occupiers of the residential and office units will be familiar with the traffic and mobility approach prior to purchase / occupation. Reduced car parking on site and in the area will therefore be the norm from the outset. As detailed in the public submissions received, a Mobility Plan and Traffic Assessment will need to be further developed as development on the site progresses.

The design of the section of North Circular Road that presently splits the site, will be carefully developed following principles of mode integration and shared surfaces. The North Circular Road to O'Callaghan Strand is to be raised, to become a shared pedestrian / cycle/ priority area with vehicular access.. It is envisaged that the streetscape will include high quality elements associated with surfacing materials, lighting and urban furniture, enhanced with planting / trees as part of traffic calming measures, thereby integrating the street into the development. As part of this work and the raising of the roadway the roundabout at Shelbourne Road / North Circular Road will be upgraded.

Waste collection is likely to be centrally controlled, with storage areas within the development, or externally facilitated, with dedicated waste collection bays provided on the street. It is possible that the bin handling within the site and externally to the laybys will be done by mechanised means. With limited on-site car parking, there is likely to be additional pressure on activities such as deliveries. This refers to shopping deliveries and online shopping, potentially including bulky items. In order for these activities to operate without any significant impact on the internal courtyards and the external public realm, dedicated delivery laybys are provided on the street. This, in tandem with ensuring that internal areas are also accessible to vehicles, will provide the capacity and flexibility to accommodate the potential requirements associated with deliveries.

## 6.6 Sustainability & Climate Change

- Must be at the heart of development – building materials, alternative energy etc.
- Key focus required on climate change mitigation.
- Impact of scale of development on floodplain
- What protection is there for Fernhill from flooding.
- Noise pollution during construction

The site has the opportunity to become a precedent development addressing the twin global crises of climate emergency and biodiversity loss. The particular characteristics of the site allow exploration of a number of environmental opportunities including a resilient Energy Strategy. As development advances on the site consideration will be given to the long term viability and evolution of energy systems including energy mix, building flexibility (shape and form), adaptability, pollution and other environmental agenda items including mobility, climate and health. Consideration will also be given for potential integration of water in the site energy strategy, benefitting from the unique environmental site conditions and the potential for Tidal Energy, specifically the hydrokinetic turbines, developed by Irish company GKinetic Energy, as part of a +CityxChange project for Limerick city.

Exemplar energy targets , ensuring alignment with the masterplanning principles, will be established as development progresses on site. The Vision document already incorporates a number of recommended environmental measures, which will need to be further evaluated following detailed building design, includingies

- Fabric-first principles to minimise heat loss;
- Solar design to maximise beneficial solar gains, and reduce overheating;
- Green roofs providing extensive on-site biodiversity;
- Sheltered outdoor spaces to enable year-round use;
- Climate beacon chimney shifts colour according to energy status of site;
- Environmental canopies provide protection from rain and wind while generating energy with solar PVs;
- Efficient and low carbon materials prioritised to reduce embodied carbon;
- Zero waste - comprehensive Site Waste Management Plan; and
- Healthy materials, avoiding potentially harmful chemicals.

According to the Planning System and Flood Risk Management Guidelines, most forms of development should be avoided in areas of flood risk where possible. Where development cannot be avoided, proposals for less vulnerable uses should be substituted. The Guidelines do recognise that in some instances such as existing brownfield sites in large urban areas, it may be appropriate to allow development where it can be illustrated that there is a wider strategic justification for such development and that the flood risk can be managed to an acceptable level. However, where a change of use from less vulnerable to highly vulnerable development is proposed in areas of flood risk, a Justification Test will be required. The subject site has already passed the Development Plan Justification Test as detailed in the Limerick Development Plan. Given the location of the site and its designation as a key regeneration site within the current development plan, it is envisaged that the strategic planning aspects of a Development Management Justification Test can be passed. Accordingly, the Masterplan seeks to maximise the ability to manage flood risk to an acceptable level.

While the Flooding Guidelines requires that flood risk should be managed to an appropriate level for the design life of the development, it should be done in a manner that is also compatible with the achievement of wider planning objectives in relation to development of good urban design and vibrant and active streetscapes.

A Flooding Technical Report (Flood Risk Assessment) was prepared for the site containing a variety of flood mitigation measures. These include but are not limited to raising of building floor levels, applying flood resilient and resistant measures, basement tanking and raising of the North Circular Road to provide safe access and egress. The masterplan presented has incorporated some of the recommended measures and satisfies to some degree the flood risk management requirements. There are however outstanding design items that need to be addressed during design development:

There is a requirement to provide safe access and egress above the flood levels from all buildings. The masterplan proposes raising of the NCR up to 5.70m OD, subsequently providing safe access and egress as well as minimising risk of water ingress to basements from entry points. The raising of the road will also benefit Fernhill from a flooding perspective.

The Flood Risk Assessment (FRA) completed for this project refers to current data and guidance at time of writing. Possible changes to this guidance could impact on FRA(s) to be completed as development advances and a planning application advances on the site.

## 6.7 Biodiversity

- Presence of starlings on site – red listed bird of high conservation concern
- No evidence of environmental survey informing the Masterplan
- More emphasis on retaining and reinforcing biodiversity is required.

The Masterplan seeks to minimise the impact on the existing natural eco-systems and enhance biodiversity on site. The site was the subject of detailed ecological multi-disciplinary ecological surveys and was not found to be of particular ecological sensitivity.

Following extensive bat surveys during the summer and winter seasons, the site was found to support low levels of bat activity. Higher levels of activity recorded on the static detectors were attributed to a small number of bats foraging continuously around the reservoir. There were, however, small accumulations of droppings and feeding remains in several of the buildings, which indicate some irregular use by bats. No bats were observed entering or leaving any roosts during any of the surveys undertaken. Further bat surveys will be required to provide additional information that will allow the design of the building to maximise potential for enhancing the site for bats and biodiversity in general.

Wintering bird surveys carried out revealed the site does not provide significant supporting habitat for wintering bird species or any SCI species of nearby Special Protection Areas. The site is in close proximity to the River Shannon, designated as part of the Lower River Shannon SAC and the River Shannon and River Fergus Estuaries SPA.

An Otter was observed in the River Shannon to the west of St Michaels Rowing Club during the December 2021 survey. No otter holts were recorded within the site. While otters are likely to regularly occur in the proximity of the site and might use the shoreline occasionally, the site is of generally low value for mammals (except bats). No signs of badger or other protected mammals were recorded within the site.

Overall, the project aims to promote urban biodiversity as a central component of the Masterplan. This will be achieved by providing and restoring bat roosting habitat, appropriate landscaping and creating 'Green spaces'. Extensive green areas are being incorporated in and around the reservoir and infiltration gallery. Sustainable Water Management is also proposed through the use of Sustainable Urban Drainage Systems (SuDS) including Rain Gardens, Green Roofs, Rain water harvesting, Re-use and recycling, leveraging site topography, and industrial fabric to incorporate water into public realm as a sustainable amenity.

Consultation was undertaken with the NPWS and their feedback will be incorporated into the future building design process, including the introduction of swift bricks in proposals and the advancement of landscaping proposals to comply with All Ireland Pollinators Plan, which aims to help bees, other pollinating insects and our wider biodiversity.

## 6.8 Built Heritage

- Need to consult beyond the Protected Structures Register when deciding what structures and buildings to keep / not to keep.
- Need to keep Fernbank House – one of the early original homes on NCR.
- Removing the walls around Cleeves is the wrong thing to do.
- Defining the boundary of the site is a good thing - examples in Berlin.
- Want to keep the existing Cleeves wall without making access to Stonetown Tce.

A response to many of the Built Heritage issues has already been provided in Section 5.2.4 of this report, in response to the submission by An Taisce, including the issue concerning demolition of Fernbank House. It is not proposed to restate the response here.

A Statement of Significance has informed the overall reuse strategy for the site. The strategy does not and has not solely relied on the Register of Protected Structures. The Heritage and Existing Fabric Strategy is detailed in Section 9 of the Illustrative Masterplan. Appendix V contains a detailed Statement of Significance relating to the heritage buildings on site, which have been classified into high, medium, low and negative significance. It is this Statement of Significance which has guided development on the site.

The boundary wall has been identified as part of Phase 1 of the historic development of this site. The wall reflects the curtilage of the land by the roads that pre-dated the advent of the Flaxmill, bridging between a number of buildings that currently and historically skirt the edge of the site. The original wall is built of stone taken from the site quarry, with parts of the wall containing similar historic details to those of the Flaxmill. Later alterations occurred during phases of adaption of the site, with the most obvious being the widening of the entrances post 1960s.

It is interesting to note that historically there was pedestrian access from the Cleeves site directly into Stonetown Terrace. Doorways off Stonetown Terrace indicate the location of routes into the administration block of the site. It served to secure the site, protecting the operation within and allowing the management of employees.

The wall has an important role to play in informing understanding of the phasing and operation of the site. The potential of the various parts of the boundary walls to inform understanding of the wider site means that the walls significance is commensurate with the respective phases. Nonetheless, there is tolerance for the walls to be extensively altered to permit the successful re-development of the site. This approach is supported in the Limerick Development Plan as an objective of the plan is to open the site to the city. However, more detailed analysis of the walls will allow for focused solutions to the respective sections.

In summary, the lesser the significance of the wall, the greater the tolerance for change. Where sections of the wall are proposed for removal to enable the successful re-use of the site, it would be reasonable to seek approval for detailed recording as a means to mitigate the loss of the fabric. In this way, understanding can be improved without loss to the wider significance

## 6.9 Implementation & Delivery

- Next stage of masterplan should prioritise the design and delivery mechanism for the housing and identify suitable funding.
- No indication of how residential units will be delivered – do not want pension funds etc.
- Need European examples of other exemplar projects – the focus should not solely be from the UK.

The site naturally divides itself into several discrete zones and this makes delivery and phasing attractive from a development perspective. It is likely that development of the Cleeves site will be phased in such a way as to provide for organic growth in the use of the site, without necessitating the release of too much of the site and buildings in any one phase, whilst also allowing for 'meanwhile' uses. Although the masterplan must be developed holistically, the primary sites to each side of North Circular Road could be developed

independently, but yet having regard to the requirements of the overall Masterplan. The upper level Salesians and Stonetown sites could also be developed separately with individual access, with creation of new links into the Quarry area and from Salesians down to the North Circular Road.

Although the unit mix has not yet been defined (this will be defined at planning application stage), there are different ways to live at Cleeves Riverside Quarter, possibly with outright purchase, low cost sale schemes, shared ownership, and opportunities for both social and private renting. The next stage in the Masterplan process is to go to the market to determine investor interest and to define a pathway for the delivery of the Cleeves Masterplan, including housing.

A number of Heritage Re-Use Precedents were considered in the preparation of the Masterplan. The precedents were taken from the portfolio of works undertaken by members of the Design Team. Feilden Clegg Bradley Studios are a UK based architectural team who have been fortunate to work on a Flaxmill Buildings similar to Cleeves in Templeworth and other industrial heritage sites. It is for this reason that the focus is on UK exemplar projects, as these projects were designed and implemented by the design team, providing valuable insights and lessons.

## 6.10 Requested Premises & Facilities

The following organisations have requested dedicated premises and facilities:

- Ennis Road First Responders
- Shannon Dragons and Shannon Paddlers with specific reference to the reservoir and need for storage facilities and changing rooms.
- Swimming Limerick
- Haven Hub – Suicide Prevention Centre
- Local café operator seeking premises.

Limerick Twenty Thirty has taken note of these requests and acknowledges the need for the provision of community space. Significant mixed use and community space has been accommodated within the development proposal concept. Limerick Twenty Thirty welcomes the continuous engagement of all parties as the development advances.

## 6.11 Other

- Residents are not listened to.
- Residents of Old Westfields not included in 3d model.
- Limerick Twenty Thirty Board of Directors – no Councillor representation on the Board from the Ward.

As Limerick Twenty Thirty embarks on the realisation of a significant development for the Cleeves site, it regrets that some residents feel that they are not adequately listened to, particularly at such an early stage in the project. The purpose of the Masterplan has not only been to establish a broad development framework for the site, but has also been to:

- Provide stakeholders with the information they need to participate in a meaningful way;
- Assist Limerick Twenty Thirty in understanding their concerns; and

- Provide an opportunity for Limerick Twenty Thirty to explain and rationalise the proposed development concept.

The purpose of this document is to provide a response to the submissions raised in a transparent manner and to explain to those who made submissions why certain approaches have been taken. It is intended to continue to engage with residents and the general public as development progresses.

The 3d model prepared for the public consultation was intended to aid explanation and facilitate discussion. Accordingly, it was not intended to include all existing housing in the surrounding area. It was considered that only existing development directly adjoining the development site was required to set the context and facilitate discussion.

The issue of Councillor Representation on the Board of Directors of Limerick Twenty Thirty is not a matter for consideration in the advancement of development on the Cleeves site.

## **7.0 CONCLUSION**

Limerick Twenty Thirty has actively engaged, consulted and maintained dialogue with the local community and other stakeholders from an early stage in the Masterplan process. The consultation process has been an extremely valuable exercise and has provided a detailed and enhanced understanding of the key issues and concerns of the stakeholder and local community, which have ultimately helped to shape the Masterplan Vision and will continue to influence detailed design on the site.

The objective of the public consultation process was to ensure the widest possible consultation with individuals, communities, and other stakeholders from the commencement of the project, in observance with the best industry practices. Every effort was made to identify those to engage with, in a flexible and facilitative manner, in order to build strong and effective relationships with those that will live in the wider vicinity of the Cleeves site.

Engagement will continue throughout the different stages of the project, from the initial scoping of the Environmental Impact Assessment Report (EIAR) with statutory authorities. As development progresses and a planning application is prepared, further public engagement will be advertised and facilitated therein. During the planning application stage, it is of course open to any member of the public to make a submission. During the planning stage, Limerick Twenty Thirty will remain available to the community in relation to any local issues and requirements that may arise and respond in a timely manner.

Further engagement will be required at construction and operational stages should planning permission be granted.

## **ENVIRONMENTAL IMPACT ASSESSMENT REPORT**

### **VOLUME III APPENDICES**

Appendix 4-4 Development Proposal Consultation Report



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**Cleeves Riverside Quarter**  
Outline Sketch Scheme

**Stakeholder Engagement & Public  
Consultation**

**Statement of Outcomes**

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June 2025

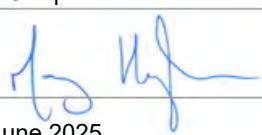


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**Document Control Sheet**

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## 1.0 INTRODUCTION

### 1.1 Background

This report summarises the issues arising from the second public consultation event held on the regeneration and redevelopment of the Cleeves site. This report should be read in conjunction with the Statement of Outcomes Report prepared at the Masterplan stage (Stage 1) and which detailed the public engagement and consultation held between February - April 2023.

The current stage (Stage 2) is focused on preparing a robust application for consent, to be submitted to An Coimisiún Pleanála for consideration. This stage involves a phased approach to development, to include detailed design consideration of new buildings, restoration of heritage buildings, design of the public realm, and demolition of some structures and buildings to open the site to the public.

A Stakeholder Engagement & Public Consultation Strategy was prepared for Stage 2 which sought to build on the engagement already undertaken for Stage 1. That Strategy has guided the extent and nature of consultation for this stage.

It should be noted that Stage 2 comprises two parts including Stage 2A1 – Outline Sketch Scheme and Stage 2A2 which is the planning application. This report was has been prepared following consultation on Stage 2A1 – Outline Sketch Scheme and is intended to inform the final planning application to An Coimisiún Pleanála (Stage 2A2).

### 1.2 Structure of Engagement and Consultation

Stage 2A1 has been subject to on ongoing consultation and engagement with key stakeholders and statutory bodies as detailed in Section 5.0 of this report.

A public consultation event was held in the Cleeves Flaxmill Building on the evening of the 4<sup>th</sup> June and afternoon of the 5<sup>th</sup> June 2025, with some 160 no. attendees across both days. The event was well publicised in local media and across social media channels, with door to door leaflet drops in adjoining residential neighbourhoods. There were also a number of direct briefings on those days with a number of key stakeholders.

### 1.3 This Report

The purpose of the Statement of Outcomes document is to report on the consultation process and provide an accurate record of feedback received during the Stage 2A1 consultation (Outline Sketch Scheme). It presents the findings from the stakeholder engagement and public consultation process. The report has been compiled to analyse the submissions and to summarise the key themes and issues emerging from different groups of respondents. All submissions have been considered thematically with reference to the issues raised and will inform detailed design for the planning application (Stage 2A2).

## 2.0 STAGE II – DEVELOPMENT PROPOSAL

Stage 2A1 comprises an Outline Sketch Scheme developed from the key principles set out in the Masterplan stage and provides an outline of the design development for the proposed development including site plans, sections, elevation and schedules of accommodation. The Outline Sketch Scheme is accompanied by a Design Report and Outline Cost Plan.

There have been some key changes since the Masterplanning stage, in particular the national need and demand for housing, associated with the need, in particular, for housing in Limerick city centre. Further, significant investment has been fast tracked for the Flaxmill building facilitating its stabilisation and restoration, with work due to commence on site in the next two months.

A phased approach to delivery of the Masterplan was always envisaged from project inception and Stage 2A1 focuses on that part of the Masterplan being advanced for planning consent. To that extent, the adaptive reuse of the Flaxmill Building, the full development of Shipyard, NCR and Infiltration gallery as set out in the Cleeves Masterplan Vision will now form part of a future phase.

At Stage 2A1 the following scope of development was proposed and which was placed on public display:

- Salesians Zone – 1 no. building with 2 no. blocks extending to 6 and 7 storeys comprising 146 no. apartments (74 no. 1 bed; and 70 no. 2 bed); a creche of 400sqm; undercroft car and bicycle parking; 20 no. 3 storey 3 bed townhouses; and 30 no. car parking spaces for the dedicated use of the adjoining Salesians Primary School.
- Quarry Zone – 1 no. Purpose Built Student Accommodation building with 3 no. blocks extending to 6 and 7 storeys comprising 271 no. bedspaces with ancillary uses at ground floor level.
- Stonetown Terrace Zone – 1 no. building extending to 5 storeys comprising 36 no. apartments (4 no. Studios, 10 no. 1 beds; 21 no. 2 beds; and 1 no. 3 bed) with storage and bicycle parking at ground floor level; and 9 no. 3 storey 3 bed townhouses
- O'Callaghan Strand Zone – 1 no. building extending to 4 / 5 storeys comprising 21 no. apartments (9 no. 1 bed and 12 no. 2 bed) and 250qm of commercial ground floorspace;
- Dedicated mobility hub with canopy including double stacker bicycle parking; and EV Charging spaces within the Shipyard Zone.
- Extensive provision (0.78 hectares) of Public Realm including areas of civic and green spaces, incorporating a riverside canopy functioning as an outdoor event space.

The proposed development will be refined for the purpose of planning application preparation (Stage 2A2), with the ability to take into consideration third party perspectives in some instances. However, it should be noted that substantial change will not occur.



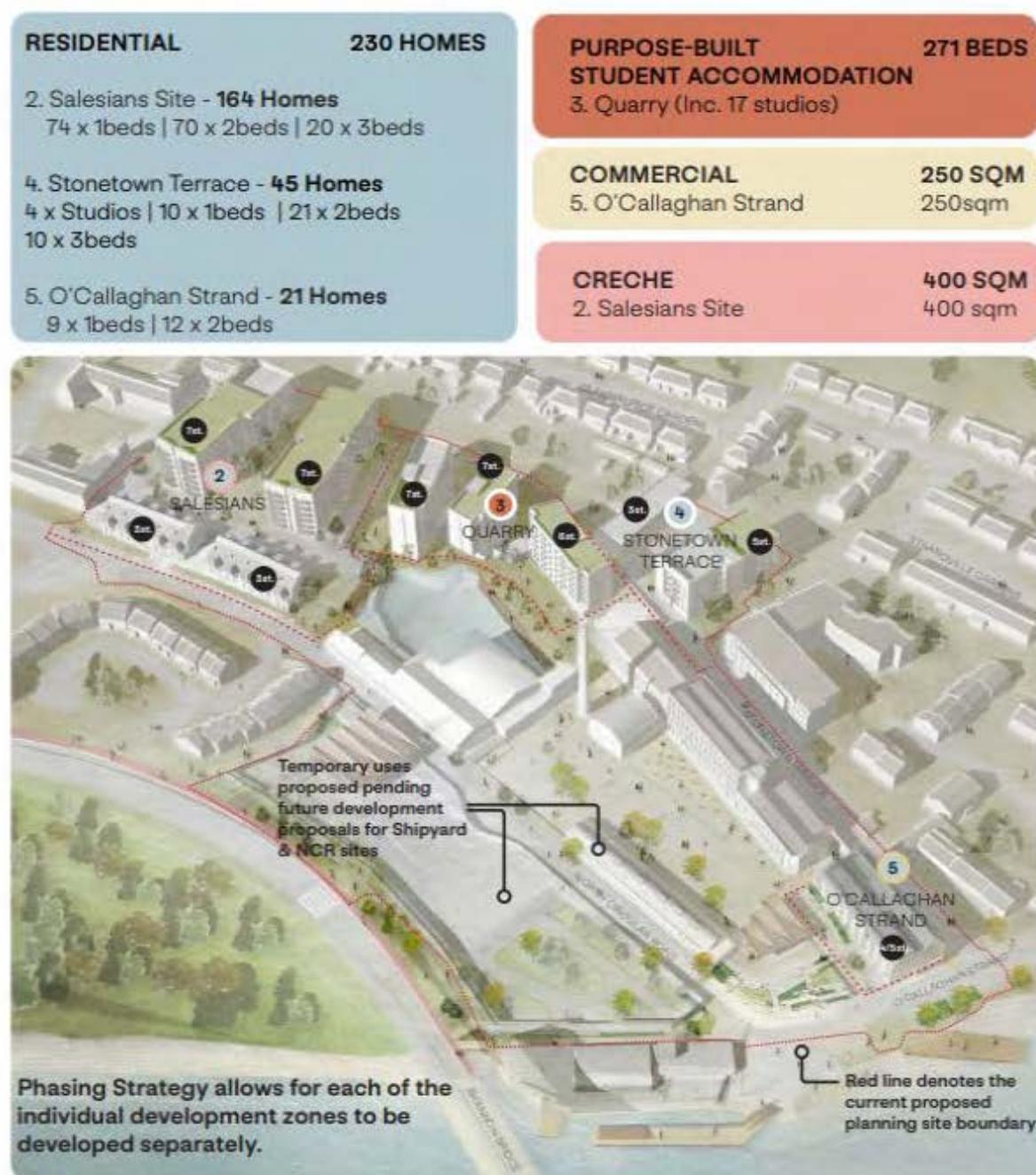
01. Illustrative View from Salesians



02. Illustrative View from the riverfront

**Figure 1.0** Images from Display Boards

An integrated mixed-use Masterplan focused around a transformational Public Realm that supports the future of working, living and learning.



**Figure 2.0** Public Consultation Notice Board Sample

### 3.0 ENGAGEMENT & CONSULTATION

#### 3.1 Limerick City & County Council Internal Departments

A number of workshops were undertaken with in-house Departments within Limerick City & County Council including, Planning Department, Housing Department, Environment Section, Active Travel, Water Services re Flooding, Traffic & Transportation, Placemaking Team and Climate Action Department.

Subsequently, presentations were made to Senior Management and Elected Representatives.

#### 3.2 Statutory Consultees

In addition to Scoping Requests issued to statutory bodies in the preparation of the Environmental Impact Assessment Report (EIAR), a number of structured meetings were undertaken as detailed in Table 1.0.

Targeted Group	Meeting Date	Meeting Outcome (see response to issues in Section 5.0 of this report)
Built Heritage Section, Department of Housing Local Government & Heritage	1 <sup>st</sup> Meeting - 03 <sup>rd</sup> June 2025  2 <sup>nd</sup> Meeting - 10 <sup>th</sup> July 2025	Initial meeting requested there be no demolition without reuse, heritage to be central, justify removal of boundary wall, need proposals for Flaxmill  Second meeting provided for a better understanding of the phased approach to development on the Masterplan site. It was clearly understood from this meeting Understand that the securing of the surviving historic fabric will form part of the initial building programme and enable the recovery of the key buildings overtime with a diversity of uses. O'Callaghan Strand building to be regraded to be in keeping with the scale, form and materiality of industrial complex. Materials from Fernbank House to be reused in-situ rather than salvaged. Consider re-use/adaptation of Fernbank rather than demolition. Reconsider removal of Victorian Houses, Fernbank House and Infiltration Gallery.
National Parks & Wildlife Service	04 <sup>th</sup> April 2025	Public Lighting strategy important, Compatibility between ecology & proposed designs; Riparian corridor and connectivity strip required; Swift considerations into buildings over 2 storeys; bat slates on Flaxmill; native planting; connectivity to Westfirelds for bats
Southern Regional Assembly	09 <sup>th</sup> December 2024	Supportive in principle of site redevelopment. Acknowledged urgent need for housing and the need to fast track housing for Stage I.
Office of Public Works	30 <sup>th</sup> May 2025	Discussed Limerick City Flood Relief Scheme with appointed Engineer Designers. Confirmed scheme was an Optioneering Stage and flood levels are similar to what was previously discussed.

**Table 1.0** Targeted Stakeholder Briefings & Workshops

### 3.3 Neighbours & Occupants

Individual presentations and consultation was undertaken with the following groups over the 4 – 5<sup>th</sup> June 2025, including St. Michael's Rowing Club; Salesians Primary School; current tenants within Cleeves, and neighbouring residents at Stonetown Terrace, Fernhill, Clanmaurice Avenue; and Lansdowne Hall

### 3.4 Written Submissions

A total of 32 no. written submissions were received from members of the public. A majority of submissions were from neighbouring and adjoining residents. Whilst a number of submissions were supportive of the proposal and requested increased height and density, the majority of submissions raised issues of density, massing, scale, along with lack of facilities and opportunities for active recreation.

## 4.0 ISSUES RAISED

The stakeholder engagement and public consultation process raised a number of similar issues in respect of the Outline Sketch Scheme. In order to avoid undue duplication, it is proposed to group the submissions into themes and to holistically address all issues on a thematic basis. The identified themes with broad brush issues are detailed in Table 2.0 with each theme identified in detail in Section 6.0 of this Statement.

In keeping with Data Protection legislation, individual submissions received will not be published.

Theme	Specific Issues
Residential Use & Amenity	<ul style="list-style-type: none"> <li>– The plan includes a good mix of intensified development, heritage protection and nature based solutions</li> <li>– No Daylight &amp; Sunlight Assessment</li> <li>– No distance provided between the building blocks and neighbouring development including houses on Clanmaurice Ave and Salesians School</li> <li>– Will there be balconies on the 5 storey Stonetown Terrace block</li> <li>– Failure to provide sections and cross sections.</li> </ul>
Tenure Mix & Unit Type	<ul style="list-style-type: none"> <li>– A mix of public and private housing is required to facilitate tenure diversity.</li> <li>– Number of one bed units is welcomed</li> <li>– Need housing to accommodate elderly and facilitate downsizing</li> <li>– Number of student accommodation is too high</li> <li>– Reduce number of apartments and increase housing</li> </ul>
Design	<ul style="list-style-type: none"> <li>– Apartments in Salesians are out of date and will age badly.</li> </ul>
Recreational Uses	<ul style="list-style-type: none"> <li>– Need for inclusion of sports facilities</li> <li>– Need a lot more greenery</li> <li>– No allotments or sports/community facilities</li> <li>– No creche, medical centre, swimming pool or playgrounds</li> <li>– No facilities for the local community</li> <li>– Need separate facilities for students and for adults – public realm cannot serve both.</li> </ul>
Density Height & Massing	<ul style="list-style-type: none"> <li>– Lacks ambition. Density and height should be a lot greater.</li> <li>– Should be 3 – 4 storey blocks rather than 6 - 7</li> </ul>

	<ul style="list-style-type: none"> <li>- Need more spaced out development with more greenery</li> <li>- Effect of height on neighbouring residents</li> <li>- No regard to planning conditions imposed on the original Stonetown Terrace development</li> <li>- Lack of compatibility with established context</li> <li>- Impact on wind &amp; downdraught is required.</li> <li>- All buildings within 30m of Clanmaurice Ave should be a maximum of 3 storeys in height</li> </ul>
Traffic, Mobility & Pedestrian Connectivity	<ul style="list-style-type: none"> <li>- Severe lack of car parking</li> <li>- Request to make 4 no. existing parking spaces on Stonetown Tce designated parking spaces for existing residents.</li> <li>- Significant existing traffic congestion</li> <li>- Inadequate car parking.</li> <li>- A full Traffic Impact Assessment is required.</li> <li>- Full engagement with the National Transport Authority is necessary</li> <li>- Construction traffic, bin access and servicing not considered</li> </ul>
Environmental Impact	<ul style="list-style-type: none"> <li>- An Environmental Impact Assessment is required</li> </ul>
Biodiversity	<ul style="list-style-type: none"> <li>- Need a greater emphasis on ecological restoration</li> <li>- Proposal for the rivers edge is too harsh</li> <li>- Quarry area needs to maintain its biodiversity</li> </ul>
Built Heritage	<ul style="list-style-type: none"> <li>- The flaxmill should be turned into a museum highlighting the many industries in Limerick throughout the years.</li> <li>- The chimney could accommodate a laser display from the top.</li> <li>- Fernbank House should be retained and should be a focal point for the development.</li> <li>- Fernbank House would make a great Community Centre</li> </ul>
Requested Premises & Facilities	<ul style="list-style-type: none"> <li>- Ennis Road Community First Responders seeking to operate from the development</li> <li>- Some commercial units proposed should be identified for crafts and artists to open similar to the Buttermarket in Enniskillen and Kilkenny Design Centre</li> </ul>
Other	<ul style="list-style-type: none"> <li>- Inadequate water &amp; sewerage infrastructure to accommodate the development</li> <li>- Part of the site should be set aside for a Food Market similar to Marina Market in Cork.</li> <li>- What is the plan in terms of maintenance of the development</li> <li>- What is the plan for when students are not in residence</li> </ul>

**Table 2.0** Consultation Written Submissions

## 5.0 RESPONSE TO STATUTORY CONSULTEES

The issues raised by the statutory consultees can be broken into Built Heritage, Ecology & Biodiversity and Flooding. It is proposed to address each of these issues in turn and demonstrate how they have been addressed within the development proposal.

### 5.1 Built Heritage

#### *Issue Raised:*

The Built Heritage Section of the Department of Housing Local Government & Heritage highlighted in their first meeting that no demolition should occur without reuse and that heritage must be central to the proposal, including identified uses for the Flaxmill building. In addition, justification is required for removal of the boundary wall. In their second meeting there was a more detailed understanding of the proposed development for Cleeves and the different phases of construction. There was an understanding that the securing of the surviving historic fabric will form part of the initial building programme and enable the recovery of the key buildings overtime with a diversity of uses. A number of issues however, remain to be addressed.

#### *Response:*

Due to a number of factors, it is necessary to bring the Masterplan proposal forward in phases.

Whilst the Flaxmill building has always been central to the regeneration and redevelopment of the site, identifying appropriate uses for the building has always been a challenge. The signing of a Memorandum of Understanding with the Technological University of Shannon (TUS) for the use of the Flaxmill Building as part of a wider Educational Campus on the site, has provided the building with a practical and viable use going forward. However, the development of an educational campus on Cleeves is at early design stage and needs to advance through a number of key stages prior to development into a planning application. In contrast the proposed development is well advanced. In light of the critical need for housing in the country and in Limerick city, as submitted by a number of stakeholders during the Masterplan consultation period, it was decided to advance the residential and public realm elements of the overall Masterplan. Because a future, viable use has been identified for the building, which is currently being advanced, it was considered there was no purpose in including the Flaxmill in the current application for consent.

However, the Flaxmill building has not been ignored as a contractor is about to be appointed to undertake stabilisation and repair works to the upper section of the Mill and its roof. This work, with funding to the tune of €5 million, will contribute to the future viable use of the building.

A comprehensive statement has been prepared which assesses all buildings and structures on site. This 'Statement of Significance' has been used to guide and inform the treatment of all structures on site. Whilst demolition is proposed to some structures on site, it is not proposed to demolish any protected structures. The proposed demolition includes either c20th additions or elements that are absolutely necessary to facilitate the development. This Statement of Significance has been amended to more comprehensively address the history of Salesians as it evolved throughout the years and the Infiltration Gallery is no longer included in the development proposal.

There are two Victorian houses fronting onto North Circular Road which are to be demolished to facilitate development of the overall scheme. Removal of these buildings is necessary to facilitate universal pedestrian and cycle access from the proposed PBSA to North Circular Road. Further, removal of the houses is necessary to facilitate a construction access to the Quarry site, as the only other alternative is a narrow

access between the chimney (protected structure) and the Infiltration Gallery, which could potentially impact the chimney in the event of an accident. The houses shall be preserved by record.

Similarly, it is proposed to demolish Fernbank House which has been substantially modified over time. Material from Fernbank House will be recorded and reused on site where possible. Interestingly, a recent request was made by the public to list Fernbank House on the Record of Protected Structures. The report from the Conservation Officer within Limerick City & County Council recommended against its protection on the basis that whilst the *“site is of some social interest and that some surviving architectural and decorative features and fittings are of some architectural and artistic interest, the interest is limited and is not considered sufficient to warrant inclusion on the Record of Protected Structures, particularly given that the site has been extensively altered and developed throughout the 20<sup>th</sup> century with the result being a disharmonious complex of low architectural quality”*.

The boundary wall has been identified as part of Phase 1 of the historic development of this site. The original wall is built of stone taken from the site quarry, with parts of the wall containing similar historic details to those of the Flaxmill. Later alterations occurred during phases of adaption of the site, with the most obvious being the widening of the entrances post 1960s.

The potential of the various parts of the boundary walls to inform understanding of the wider site means that the walls significance is commensurate with the respective phases. Nonetheless, there is tolerance for the walls to be extensively altered to permit the successful re-development of the site. This approach is supported in the Limerick Development Plan as an objective of the plan is to open the site to the city.

## 5.2 Biodiversity

### *Issue Raised:*

The NPWS highlighted the importance of the public lighting strategy for the site, with respect to biodiversity and in particular bats. Compatibility is required between biodiversity and the proposed designs, in particular riparian corridor and connectivity strips between the site and the river and the site and Westfields. Enhancement measures for Swifts should be considered in any building over two storeys.

### *Response:*

The site has been subject to extensive surveying and analysis by the MKO Ecology team. This analysis has informed design with an emphasis on habitat retention and enhancement insofar as possible and has informed Chapter 7.0 Biodiversity in the EIAR.

Due to the scale of the project, it is not possible to retain the majority of habitats within the site throughout construction. It is notable that the project has aimed at retaining the most suitable area on site for biodiversity, the reservoir. The reservoir is therefore the focus of biodiversity mitigations and enhancements

Following extensive bat surveys during the summer and winter seasons, the site was found to support low levels of bat activity. Higher levels of activity recorded on the static detectors were attributed to a small number of bats foraging continuously around the reservoir. There were, however, small accumulations of droppings and feeding remains in several of the buildings, which indicate some irregular use by bats. No bats were observed entering or leaving any roosts during any of the surveys undertaken.

Existing connecting features include the quarry walls and above private gardens towards Shelbourne Rd Lower, as well as the terrace house gardens towards Fernhill. It is proposed to maintain connectivity

features along the quarry walls to the south, and along the northern boundary of the site. Landscaping and lighting will ensure a dark corridor is available in this area, to provide a link to the reservoir on site. All these features will be maintained and enhanced. No vegetated connectivity currently exists directly towards the river and it is not proposed to provide same.

Overall, the project aims to promote urban biodiversity as a central component of the Masterplan. This will be achieved by providing and restoring bat roosting habitat, appropriate landscaping and creating 'Green spaces'. Three no dedicated bat houses are to be erected on site and extensive green areas are being incorporated in and around the reservoir and infiltration gallery.

### 5.3 Flooding

#### *Issue Raised:*

Query from the Council's Flood Relief Scheme on the frequency of the erection of the temporary flood barrier at junction of O'Callaghan and North Circular Road, and how this aligns with flood events. The team working on the City Flood Relief Scheme noted that an objective for the Scheme is to minimise demountable solutions where possible.

#### *Response:*

The lowest levels of the existing road / pathway surface at the junction of O'Callaghan Strand and Stonetown Terrace are approximately 4.0mOD, almost exactly at the 1 in 2-year tidal flood level on the River Shannon and likely to cause very shallow flooding of the existing roadway / pathway. ARUP confirms that there may be a need to close / erect the gate / barriers, on average, 3 to 5 times every two years, assuming current road / pathway levels remain unchanged.

## 6.0 THEMATIC ISSUES

### 6.1 Residential Use & Amenity

- The plan includes a good mix of intensified development, heritage protection and nature based solutions
- No Daylight & Sunlight Assessment
- No distance provided between the building blocks and neighbouring development including houses on Clanmaurice Ave and Salesians School
- Will there be balconies on the 5 storey Stonetown Terrace block
- Failure to provide sections and cross sections.

Limerick Twenty Thirty (LTT) acknowledge the support offered for the development proposal and has worked hard to achieve an appropriate balance in residential delivery, provision of new public realm and heritage protection.

Stage 2A1 Outline Sketch Scheme was informed by the preliminary results arising from the Daylight & Sunlight Assessment being prepared by Integrated Environmental Solutions (IES). The application for consent (Stage 2A2) will be accompanied by a detailed Daylight & Sunlight Assessment, which shall comprise Chapter 17 of the Environmental Impact Assessment Report (EIAR).

Stage 2A1 only comprised an Outline Sketch Scheme and so did not include the level of detail expected in support of a planning application (Stage 2A2). The Site Layout Plan to be submitted with the application

for consent shall contain relevant dimensions, including distances between buildings blocks and between existing adjoining buildings. Similarly, a full suite of sections and cross sections shall be provided.

The proposed five storey apartment block at Stonetown Terrace has balconies on the western, southern and eastern elevations. There are no balconies proposed on the northern elevation facing Clanmaurice Gardens.

## 6.2 Tenure Mix & Unit Type

- A mix of public and private housing is required to facilitate tenure diversity.
- Number of one bed units is welcomed
- Need housing to accommodate elderly and facilitate downsizing
- Number of student accommodation is too high
- Reduce number of apartments and increase housing

The development proposed is 'tenure blind' thereby affording maximum flexibility at implementation and delivery stage. Housing needs and demands are continuously changing and are in a state of flux, dependent on market circumstances at a point in time. From a housing perspective the site needs to be able to react to the greatest needs at the time of delivery, such that an acceptable balance of social, affordable and private housing can be accommodated on the site at that time.

The number of one bed units has been finely balanced and comprises 42.6% of the overall residential units (excluding the student accommodation). The existing ratio of 1 and 2 bed units in the Castle C Electoral Division (ED) surrounding the site and the wider Limerick City & Suburbs area, suggest an over dominance of 3+ bed housing units. Whilst the proposed development does accommodate some 3 bed units in order to accommodate housing mix and tenure diversity within the development, the focus is on one and two bed units which is undersupplied in the area, based on the Housing Need Demand Assessment (HNDA) projections as detailed in the Limerick Development Plan 2022 - 2028.

In addition to 42.6% of one beds, there are 44.3% two bed units proposed within the development. These two beds are generally in excess of minimum apartment sizes required under the Guidelines for Planning Authorities - Design Standards for New Apartments 2023 and would be suitable for 'downsizing'. Further, the servicing area within the apartment blocks (access corridors) have been sized to Universal Design Standards (UD), thereby providing flexibility to accommodate UD apartments as the need arises.

The Purpose Built Student Accommodation (PBSA) has been designed to facilitate tenure diversity and to address a further sector requiring housing in Limerick city. Whilst not dependent on the proposed TUS Educational Campus which will form Phase III of the proposed development of Cleeves, the provision of student accommodation adjoining an educational campus will facilitate synergistic uses. Further, the provision of PBSA will free up existing private housing currently rented to students, to other rental needs.

The need for greater housing provision in Limerick City is recognised by Limerick Twenty Thirty. National Policy Objective 10 as set out in the National Planning Framework (NPF) promotes compact growth which means higher densities in our towns and cities. In response to this objective, the Limerick Development Plan 2022 – 2028 specifies that city centre sites, such as the subject site, accommodates minimum densities of 100 units per hectare. An apartment unit is the only unit typology capable of achieving such densities. There is significant 'family living space' on adjoining neighbouring sites comprising detached

and semi-detached units. The proposed apartment typology will facilitate mixed housing provision in the area.

### 6.3 Design

- Apartments in Salesians are out of date and will age badly.

The Stage 2A1 Outline Sketch Scheme did not contain detailed design including elevational treatment. Whilst the elevational grids were presented at the public consultation event, the architectural quality that can be achieved as well as the simple detailing in brick, material and mortar colour, was not presented.

The proposed elevations of the buildings have been inspired by the rigor and simplicity of the Flaxmill, a regular elevation, with repeatable components and simple brick detailing to deliver a series of high quality, efficient and robust buildings. Materiality details along with a series of CGI's will be included in the application for consent.

### 6.4 Recreational Uses

- Need for inclusion of sports facilities
- Need a lot more greenery
- No allotments or sports/community facilities
- No creche, medical centre, swimming pool or playgrounds
- No facilities for the local community
- Need separate facilities for students and for adults – public realm cannot serve both.

A Landscape Strategy including a review of Limerick's civic spaces and public parks was undertaken to inform the Masterplan Vision Document. The strategy identified that there is limited amenity on the northern side of the River Shannon. Whilst the subject site will not be able to address all recreational deficiencies in the area, it can facilitate significant soft and hard public open space, for the benefit of existing and proposed new residents. The amenity potential of the reservoir area is currently being explored so that it can accommodate recreational use in harmony with its biodiversity function. A public park, including a play space with a special character relating to the cultural and natural heritage of the site is provided around the reservoir.

Whilst the aim of the Public Realm Strategy is to leave the space in front of the sunlit Flaxmill façade open in order to give space for the building to stand out, this space will also offer a flexible space for events with a riverside canopy. The North facing side of the Flaxmill plaza will be populated with seating, trees and planters, still allowing a free movement through the space. Trees and planting also offer shelter from the South-West winds.

The landscaping and public realm strategy primarily offers a series of passive, interconnected green spaces throughout the development, with areas of playspace identified within each zone. Whilst there are no dedicated areas of sports facilities within the development, the riverside canopy area does provide an opportunity for informal play space or covered outdoor training sessions.

The proposed development does provide for a sizeable creche facility of 373sqm at ground floor level in the apartment building on the Salesians site, catering for 34 no. children. Further there is circa 250sqm of commercial floorspace proposed at ground floor level of the apartment building on O'Callaghan Strand.

Further, there is enormous potential to accommodate additional community facilities and services on the ground floor of the Flaxmill building as part of the Phase III TUS Educational Campus application. The active use of the Flaxmill ground floor was clearly identified in the Masterplan. Presently the site offers accommodation on a license basis to a number of community groups in the area. It is anticipated that such uses can continue in buildings to be retained on site, pending the delivery of Phase III development.

The public realm, open space and connectivity links are intended for the integrated and shared use of all residents on the Cleeves site, including student and adults and including the general public from surrounding areas.

## 6.5 Density Height & Massing

- Lacks ambition. Density and height should be a lot greater.
- Should be 3 – 4 storey blocks rather than 6 - 7
- Need more spaced out development with more greenery
- Effect of height on neighbouring residents
- Lack of compatibility with established context
- Impact on wind & downdraught is required.
- All buildings within 30m of Clanmaurice Ave should be a maximum of 3 storeys in height

The Building Height Strategy for Limerick, as contained in the Development Plan, promotes increased building height at Cleeves. The strategy states that '*taller, landmark, gateway and city landmark buildings as defined in the 'Tall Building Classifications', are appropriate*'. However, it does acknowledge the lower scale of buildings predominant in the area. In response to this the strategy states "*It is recognised that there may be an impact on neighbouring residential buildings as the height is generally lowline in the surrounding area. However, there is a high quality townscape and placemaking argument which can be deemed appropriate for an area of height due to the nature of the site.....*"

The massing strategy proposed in the Masterplan is sympathetic to the surrounding local context whilst engaging with the waterfront and enhancing the visibility of the Cleeves site as a landmark development. The Salesians and Stonetown site to the north respond to the immediate context of low- to mid-rise buildings and the existing Flaxmill building on site, with massing stepping between 3 and 7 storeys. To the south-west of the site on the Shipyard, a new iconic marker is proposed along the riverfront forming a relationship with both the Riverpoint development across the Shannon and the existing Chimney Stack element on site.

National Policy Objective 10 as set out in the National Planning Framework (NPF) promotes compact growth which means higher densities in our towns and cities. Further, the Urban Development and Building Height Guidelines for Planning Authorities 2018 provide support for taller buildings and highlight the importance of facilitating taller buildings, particularly proximate to city centres. In response to this objective, the Limerick Development Plan 2022 – 2028 specifies that city centre sites, such as the subject site, accommodates minimum densities of 100 units per hectare. Accordingly, the development must proceed with higher densities, in contrast to prevailing densities in the area and in accordance with the requirements in the Development Plan provides residential uses on site at a rate of circa 115 units per hectare. This density is reduced from that originally proposed at Masterplan stage and which comprised 133 units per hectare.

The Development Plan focuses delivery of tall buildings in the City Centre, with tall building clusters encouraged on the Cleeves site (Objective CGR O9). For the purposes of the Masterplan, the following heights have been considered:

- The Townhouses along the North Circular are 3 storeys high to reflect the immediate residential scale in this location. The residential blocks at the upper level of the site (Salesians site) are 6 - 7 storeys aligned along a North/South axis to minimise overlooking and overshadowing, whilst allowing light through to the rear gardens of Clanmaurice Avenue. Note that these buildings were reduced in scale and height following the Masterplanning Public Consultation.
- Within the quarry site in front of the reservoir there are three blocks extending to 6 – 7 storeys. These blocks are framed by the high quarry wall to the rear and the long rear gardens of Clanmaurice Avenue which ensures no overlooking / overshadowing of residential units occurs.
- On the Stonetown Terrace site, the residential proposal provides a 3 storey residential block along the western boundary respecting existing housing in Clanmaurice Avenue. A 5 storey residential block is aligned along a North/South axis to the rear of Lansdowne Hall.

A Wind Microclimate Assessment has informed the overall design of the scheme and a detailed assessment will comprise Chapter 16.0 of the EIAR.

## 6.6 Traffic, Mobility & Pedestrian Connectivity

- Severe lack of car parking
- Request to make 4 no. existing parking spaces on Stonetown Tce designated parking spaces for existing residents.
- Significant existing traffic congestion
- Inadequate car parking.
- A full Traffic Impact Assessment is required.
- Full engagement with the National Transport Authority is necessary
- Construction traffic, bin access and servicing not considered

A full Traffic Impact Assessment accompanies the development proposal and traffic is fully assessed in Chapter 18.0 of the EIAR. The National Transport Authority (NTA) were consulted as part of the preparation of the EIAR and their recommendations were incorporated into Chapter 18.0.

Having regard to the ambitious targets which are set out in the Climate Action Plan for the transport sector, Limerick will see a significant transition to sustainable and active modes of travel in the coming years. The transport approach and strategy for the Cleeves site has been carefully considered and is being driven by existing policies at national, regional and local level.

The site has been designed for pedestrian and cyclist priority. North Circular Road and Stonetown Terrace are being redesigned to be shared streets, where pedestrians, cyclists, and private vehicles share the street space. Traffic volumes and speeds will be low and sufficient refuge space will be provided for pedestrian use. Part of the strategy includes limiting car parking provision to discourage car travel amongst residents and visitors.

Car parking is provided at a level of 1 space for every 3 units, with the proposed development providing 77 no. spaces overall. Reduced car parking on site is intended to reduce traffic congestion in the area. The car parking provision considers the city centre location, promotion of active modes of travel and market expectations, while mitigating potential parking impacts on surrounding streets. The Shipyard plot provides

for a residential car club on the existing surface car park. This will provide alternative access to a car for residents who may not own a car. Further, significant quantum of cycle parking (over 500 spaces) is being provided in line with policy requirements for all buildings, including long-term for residents and short-term for visitors.

All public realm proposals have been tested to accommodate the circulation of all the necessary vehicles, including large vehicles associated with emergency and/or servicing.

Waste collection shall be centrally controlled, with storage areas at ground floor level within the apartment buildings. Bin handling within the site and externally to the laybys will be done by mechanised means. With limited on-site car parking, there is likely to be additional pressure on activities such as deliveries. This refers to shopping deliveries and online shopping, potentially including bulky items. In order for these activities to operate without any significant impact on the internal courtyards and the public roads, dedicated delivery laybys are provided on the street.

A detailed Construction Environmental Management Plan (CEMP) will accompany the development proposal and contain construction sequencing with proposals for construction access.

With respect to the 4 no. existing public parking spaces on Stonetown Terrace, LTT has no power of authority to designate the parking spaces. This responsibility rests with Limerick City & County Council and would be subject to the passing of a Bye-Law.

#### 6.7 Environmental Impact Assessment

- An Environmental Impact Assessment is required

An Environmental Impact Assessment is currently being prepared and will be submitted with the application for consent.

#### 6.8 Biodiversity

- Need a greater emphasis on ecological restoration
- Proposal for the rivers edge is too harsh
- Quarry area needs to maintain its biodiversity

See Section 5.2 of this report which details a response to biodiversity issues already raised by the NPWS.

#### 6.9 Built Heritage

- The flaxmill should be turned into a museum highlighting the many industries in Limerick throughout the years.
- The chimney could accommodate a laser display from the top.
- Fernbank House should be retained and should be a focal point for the development.
- Fernbank House would make a great Community Centre

See Section 5.1 of this report which details a response to Built Heritage issues already raised by the Built Heritage Unit of the Department of Housing Local Government & Heritage.

As detailed previously in this report, the Flaxmill is intended to be used for educational purposes.

As detailed previously in this report, Fernbank House is proposed for demolition. As detailed in a report from the Conservation Officer within Limerick City & County Council, which recommended against its inclusion on the record of protected structures, “*whilst the site is of some social interest and that some surviving architectural and decorative features and fittings are of some architectural and artistic interest, the interest is limited and is not considered sufficient to warrant inclusion on the Record of Protected Structures, particularly given that the site has been extensively altered and developed throughout the 20<sup>th</sup> century with the result being a disharmonious complex of low architectural quality*”.

To facilitate the comprehensive redevelopment of the Salesians site, Fernbank House must be demolished, as its retention would result in inefficient and unviable development on a key city centre site, contrary to the principles of compact growth and urban development. Appendix 7.0 of the Building Recording Report for Fernbank House details the materials that can be salvaged for reuse, whilst the Architectural Design Statement details the reuse of some material on site IN Section 5.5.

#### 6.10 Requested Premises & Facilities

- Ennis Road Community First Responders seeking to operate from the development
- Some commercial units proposed should be identified for crafts and artists to open similar to the Buttermarket in Enniskillen and Kilkenny Design Centre
- Part of the site should be set aside for a Food Market similar to Marina Market in Cork.

The Ennis Road Community First Responders currently occupy part of the Cleeves complex, subject to a license agreement. It is envisaged that this use can continue pending redevelopment of the site. As the proposed development progresses to delivery, there are other potential buildings which are to be retained on site and which could be occupied pending delivery of Phase III.

There is circa 250sqm of commercial floorspace proposed at ground floor level of the apartment building on O’Callaghan Strand. Further, there is enormous potential to accommodate additional community and commercial uses on the ground floor of the Flaxmill building as part of the Phase III TUS Educational Campus application, subject to securing viable operators. The active use of the Flaxmill ground floor was clearly identified in the Masterplan.

There is enormous potential on the site to accommodate Food Markets, Craft Fairs and other events within the Flaxmill Plaza, under the protected Riverside Canopy area. Further, pending redevelopment proposals on the Shipyard site, there is potential to accommodate temporary, meanwhile uses including fairs and markets.

#### 6.11 Other

- Inadequate water & sewerage infrastructure to accommodate the development
- What is the plan in terms of maintenance of the development
- What is the plan for when students are not in residence

Contrary to the submission of third parties there is adequate water and sewage capacity to accommodate the development as confirmed in the Confirmation of Feasibility secured from Uisce Eireann.

It is intended that the proposed development will be managed by a Maintenance Company, thereby ensuring a high standard of maintenance across public spaces. The PBSA will be managed by a professional student management company as detailed in the Operational Student Management Plan to be submitted with the application for consent.

When students are not in residence it is proposed that the PBSA be used for short term letting purposes thereby maintaining vibrancy within the Cleeves site outside of term time.

## 7.0 CONCLUSION

Limerick Twenty Thirty has actively engaged, consulted and maintained dialogue with the local community and other stakeholders from an early stage in the Masterplan process. LTT has sought to balance the requirements of the public, with the mandatory requirements of planning and public policy, necessitating greater density, apartment typologies and taller buildings.

As the development progresses and a planning application is being prepared, further public engagement will be advertised and facilitated therein. During the planning application stage, it is of course open to any member of the public to make a submission. During the planning stage, LTT will remain available to the community in relation to any local issues and requirements that may arise and respond in a timely manner.

Further engagement will be required at construction and operational stages should planning permission be granted.