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An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
DOI V902

15th June 2026

Re: ACP-323849-25

Mixed use development that seeks the regeneration and adaptive reuse of a strategic brownfield site, as part of the Limerick City and County Council 'World Class Waterfront revitalisation and transformation project' 'Cleeves Riverside Quarter' in the townland of Farranshone More in Limerick City.

Dear Sir / Madam

We refer to your letter of the 25th March 2026 and the further information sought under Section 175(5)(a) of the Planning and Development Act 2000 as amended. An integrated response has been prepared by the Design Team in relation to the 6 no. headings detailed in your letter and it is proposed to respond to each of the 6 no. issues in turn.

1.0 FURTHER INFORMATION RESPONSE OVERVIEW

In support of this response, new drawings have been prepared to clarify and support aspects of the development proposal as required. The additional drawings are detailed in the Schedule of Amended Planning Drawings – RFI Response prepared by the Architectural Design Team.

In addition to the submitted drawings, a number of amended reports are also submitted to clarify elements of the development proposal in response to the further information request, as follows:

- Revised Housing Quality Assessment
- Architectural Design Response: Quarry Separation Distances
- Revised Landscape Design Report
- Revised Construction Environmental Management Plan
- Childcare Assessment



- Addendum Daylight Study – Student Accommodation
- Addendum Environmental Impact Assessment Report

The Environmental Impact Assessment Report (EIAR) has been updated to consider the additional information submitted and in particular the consequences of the Bat Derogation License, which necessitates ex situ works by the applicant on other land in their ownership. Further the EIAR considers minor design revisions occurring as a result of the further information response. A synopsis of the amendments made to the chapters is detailed hereunder:

No.	Further Information Request	Addressed in Chapter
	Bats	
1.	Bat Derogation License	Addressed in Chapters 1.0; 2.0; 6.0; 7.0; 8.0; 10.0; 11.0; 12.0; 17.0; 18.0; 19.0 and 23.0
	Residential Amenity	
2.	Proposed new retaining wall	Principle already considered in EIAR as part of development proposal. Refer to Chapter 2.0 Project Description Section 2.5.3
3.	Revised site layout plan indicating separation distances to nearby existing dwellings and buildings	Additional information clarifying proposal - does not change development detail or EIAR assessment
4.	Site sections of the proposed development particularly in relation to the existing dwellings along Clanmaurice Avenue	Additional information clarifying proposal - does not change development detail or EIAR assessment
5.	Details as to how the basement pump will be accessed.	Additional information clarifying proposal - does not change development detail or EIAR assessment
6.	Amend the Housing Quality Assessment as the proposed Salesians Triplex buildings are not considered as dual aspect.	Additional information clarifying proposal - does not change development detail or EIAR assessment
7.	Demonstrate that the purpose-built student accommodation is in compliance with the required minimum separation distance as per Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities.	Chapter 1.0 and 12.0 address this
8.	Detail the unit numbers on all floor plans for the proposed Salesians units.	Additional information clarifying proposal - does not change development detail or EIAR assessment
9.	Clarifications regarding the Salesians Landscape Plan re universally accessible pathways and clarification re proposals.	Additional information clarifying proposal - does not change development detail or EIAR assessment
10.	A revised Site Layout Plan shall define communal areas of open space and provide a schedule on the map.	Chapter 2.0 clarifies communal open space quantum

11.	Clarification regarding provision of private open space at Stonetown Terrace	Additional information clarifying proposal - does not change development detail or EIAR assessment
12.	Revised landscaping proposals to include provision of trees between the existing boundary wall to the rear of Clanmaurice Avenue and to the northern boundary of the Salesians and Quarry Zones.	Additional information clarifying proposal - does not change development detail or EIAR assessment
Flooding & Surface Water		
13.	Clarification re raising of North Circular Road and tie ins with the Shipyard site to the south.	Additional information clarifying proposal - does not change development detail or EIAR assessment
14.	Update on the proposed flood mitigation measures associated with the Limerick (River Shannon) Flood Relief Scheme (FRS). and detail whether the proposed development is reliant on these measures.	Additional information clarifying proposal - does not change development detail or EIAR assessment
Typographical errors		
15.	Update topographical errors to Chapter 18 Material Assets Traffic & Transport,	Chapter 18.0 updated
Transport		
16.	Clarification on the correct number of car parking spaces for the proposed Shipyard Site.	Chapter 18.0 has been corrected
17.	Provide a site layout plan at a scale of 1 :500 indicating the location of staff car parking	Chapter 1.0 introduces the change and Chapter 18.0 addresses provision of temporary staff parking during construction.
18.	Provide details on the proposed construction timelines of the new pedestrian and cycle bridge across the River Shannon	Additional information clarifying proposal - does not change development detail or EIAR assessment
19.	Provide details of timescale for the delivery of the LSMATS and to provide details on how the proposal links into the proposed development cycle routes	Additional information clarifying proposal - does not change development detail or EIAR assessment
20.	Clarify the carparking proposals for the tourist accommodation use during the summer months	Additional information clarifying proposal - does not change development detail or EIAR assessment
21.	Provide details on the proposed traffic calming measures at the Salesians Roundabout	Additional information clarifying proposal - does not change development detail or EIAR assessment
Childcare		
22.	Clarification on childcare facility	Additional information clarifying proposal - does not change development detail or EIAR assessment
23.	Clarification on the number of childcare facilities in the area and the need for an additional facility at that location.	Additional information clarifying proposal - does not change development detail or EIAR assessment

3.0 RESPONSE TO FURTHER INFORMATION REQUEST

2.1 Bats

A Baseline Bat Survey was carried out which identified four active roosts for Lesser Horseshoe Bat and Soprano Pipistrelle. The documentation states that a Bat Derogation licence for Phase I is required. The applicant should be aware that a Bat Derogation Licence is required from the NPWS as part of the consent process in order for An Coimisiún Pleanála to make a determination. A Bat Derogation Licence is required under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011-2021. The applicant shall refer to Applications for Regulation 54 Derogations for Annex IV Species, Guidance for Applicants (July 2025) (Department of Housing, Local Government and Heritage).

A Bat Derogation License, Derogation Number DER-BAT-2026-201, is now being submitted in support of the development proposal and in response to the further information request.

In addition to the provision of 3 no. bat houses on site; the retention of the commuting routes into and out of the site; the provision of suitable dark and vegetated foraging areas within the quarry and reservoir areas; and the replacement of the roosting habitat that will be lost throughout the site, all proposed in the original application for consent, the National Parks & Wildlife Service (NPWS) requested additional ex situ measures.

The proposed ex-situ bat house location, was selected following detailed consultations with NPWS, who suggested Clonmacken as a suitable area for the construction of an additional bat house for lesser horseshoe bats. The bat house is intended to enhance roosting opportunity in Limerick City and in proximity to suitable foraging and commuting grounds along the River Shannon. Owned by Limerick City & County Council the lands are located approximately 1.5km to the west of the Cleeves site, as detailed in Figure 1.0 below



Figure 1.0 Location of Bat House Identified by Red Star

The proposed ex situ bat house shall be delivered by Limerick City & County Council in partnership with Limerick Twenty Thirty, in advance of construction works on the Cleaves site.

Section 4(i) (b) of the Planning and Development Act 2000 (as amended) provides that development by the council of a county in its functional area, is exempted development where the project is being carried out on behalf of, or jointly or in partnership with, a local authority. Article 80(1)(k) provides a general cost threshold of €126,000, whereby such works can advance without the need for a public consultation process (Part 8). As the erection of an ex situ bat house is to be carried out by the local authority and is less than this cost threshold, its development does not need to be taken through a Part 8 process. Furthermore, the development has been screened for the purposes of Appropriate Assessment whereby it was concluded that the proposed development of a bat house at the location site would not likely give rise to significant effects on a European site.

The EIAR has been updated and amended where necessary to take account of the proposed ex situ development.

2.2 Residential Amenity

In relation to Stonetown Terrace Zone, drawing title “Stonetown Terrace Ground Floor Plan – Proposed”, drawing no. CRQMP-BMEA-3X-00-DR-AA-2020 indicates a new retaining wall to the northern and western boundary of the subject site. You are requested to submit details of the proposed new retaining wall including the materials proposed and details of the proposed infill between the retaining wall and the adjoining site boundary. In addition, you are requested to submit drawings including elevations and sections at a scale of 1:50.

Drawing CRQMP-MLA-ZZ-XX-DR-L-2008 submitted with the application shows the northern wall section at a scale of 1:50. The western wall section has been added to this drawing and submitted as part of its further information response. Drawing CRQMP-MLA-ZZ-XX-DR-L-2010 provides new elevational drawings of the wall including the materials proposed and details of the proposed infill between the retaining wall and the adjoining site boundary.

Please submit a revised site layout plan at a scale of 1:500 indicating separation distances to all nearby existing dwellings and buildings and in particular to the existing dwellings along Clanmaurice Avenue and Stonetown Terrace

Drawing CRQMP-FCBS-ZZ-02-DR-AA-0116 has been provided indicating separation distances to all nearby existing dwellings and buildings.

Please submit site sections at a scale of 1:200 of the proposed development particularly in relation to the existing dwellings along Clanmaurice Avenue with the Salesians Apartments and the Purpose-Built Student Accommodation in the Quarry Zone. The site section drawing shall include existing and proposed site levels, finished floor level and overall heights.

A total of 21 no. drawings have been prepared comprising site sections of the proposed development relative to dwellings along Clanmaurice Avenue and Stonetown Terrace. A Site Section has been prepared representative of the development proposal in the context of every neighbouring house on Clanmaurice Avenue. Drawings CRQMP-FCBS-06-ZZ-DRAA-0701 to 0721 refer.

O’Callaghan Strand drawing title “Proposed Section 02”, drawing no. CRQMP-FCBS-06-ZZ-DRAA-0790 indicates a basement pump. The applicant is required to submit exact details as to how the basement pump will be accessed. These details shall include all floor plans including a basement floor plan at a scale of 1 :200.

The O’Callaghan Strand basement sprinkler tank and pump room is shown on drawing CRQMP-FCBS-06-00-DR-AA-0240. Please refer to notes on the ground floor plan and the basement plan shown in detail 02. The basement area is provided with full maintenance access via a ground floor internal hatch with full stair access to the sprinkler tank and pump room. A vent from the basement comes up to ground floor level, venting through the facade.

In the proposed Salesians Zone, the proposed Salesians Triplex buildings are not considered as dual aspect as indicated in the Housing Quality Assessment. The triplex units either face north or south. You are required to amend the Housing Quality Assessment to reflect this.

The Housing Quality Assessment (HQA) has been updated (CRQMP-FCBS-XX-XX-RP-AA-0020 Rev P02). Of the 20 no. triplex units proposed, 4no. units are still considered to be dual aspect (each on the

eastern end of each run of triplex - 4C-0B-01, 4C-00-01, 4D-0B-01, 4D-00-01) as they have windows both to the south or north, and east.

The revision to the HQA has resulted in the quantum of dual aspect apartment and triplex units decreasing from 52.9% to 45.8%. Please note that the previous stated 56.4% included both the PBSA and the townhouses in Stonetown Terrace. There have now been excluded for the purpose of assessing compliance with the Planning Design Standards for Apartments: Guidelines for Planning Authorities 2025. It is noted that the 45.8% remains well in excess of the minimum 25% requirement set out in the Guidelines.

In regard to Purpose Built Student Accommodation located within the Quarry Zone, block 2A and block 2B as per drawing title "Quarry First and Second Floor Plan – Proposed" and drawing title "Quarry Third and Fourth Level Floor Plan – Proposed" and drawing title "Quarry Fifth and Sixth Level Floor Plan – Proposed" and the Planning Statement highlights that 21% of the overall bed spaces provided have reduced separation distances as follows 24no. rooms are separated at a distance of 14.5m –15.5m, 22 no. rooms are separated by a distance of 11 m –12.5m and 11 no rooms have a 11m separation distance. The proposed separation distances are below the required 16 metres as per Compact Settlement Guidelines SPPR 1. You are requested to revise the site layout at a scale of 1:200 demonstrating the purpose-built student accommodation in compliance with the required minimum separation distance as per Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities.

Upon detailed consideration of the further information request to revise the site layout plan demonstrating compliance with the required minimum 16m separation distance, and having regard to other relevant design standards including daylight & sunlight, noise (from roof plant) and wind microclimatic effects along with planning policy promoting compact settlements, increased density, protection of heritage amenity and protected structures, it was considered that a revised site layout plan was not the optimal solution for this brownfield site.

Further it is noted that SPPR 1 of the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities does allow for flexibility and states that "...*Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces*". (Underline Our Emphasis).

Mitigation measures had already been introduced at initial design stage to prevent overlooking including angled facades, window locations offset relative to each other minimising direct lines of sight and side panels introduced so that the main window section would not be facing another.

These mitigation measures have been further reinforced in response to the further information request with translucent / obscure glazing now proposed with angled solid metal louvres. A comprehensive rationale and explanation to the design function is detailed in the attached Architectural Design Response to Planning prepared by Feilden Clegg Bradley Studios and Bucholz Mc Evoy Architects - CRQMP-BMEA-XX-XX-RP-AA-0015-P01

In addition to the detailed architectural response, an Addendum has been prepared to the Daylight, Sunlight and Overshadowing Study prepared by Integrated Environmental Solutions, focusing on Daylight

Results for the Student Accommodation following additional overlooking prevention measures. When considering the Student Accommodation in isolation, 96% of the tested rooms within the proposed development are achieving the daylight provision targets in accordance with Table NA.1 of BS EN 17037-2018+A1-2021 using Method 2. This was previously 98% for the Student Accommodation highlighting that even with the mitigation measures in place the Student Accommodation maintains a high level of daylight performance overall.

The Commission will note that the PBSA accommodates significant external amenity communal space and it is considered that this external space will mitigate the reduced daylight provision in some of the rooms. The dedicated external amenity space for PBSA at grade is 730sqm (outline of relevant area included on the updated M+A landscape drawing attached). In addition, there is also external space provided at the 2no. first floor level terraces equating to 210sqm.

Therefore, the total dedicated internal and external amenity space for the PBSA actually provided is 1,377sqm, provided at a ratio of 5.1sqm per bedspace.

No unit numbers have been provided on all floor plans for the proposed Salesians units (Lower Ground Floor – Sixth Floor Plan Drawings) and O' Callaghan Strand units (First Floor Plan – Fourth Floor Plan Drawings). In order to clarify the Housing Quality Assessment, you are required to submit revised floor plans at a scale of 1 :200 with unit numbers clearly identified

The following plans have been updated with individual unit numbers added:

- CRQMP-FCBS-04-0B-DR-AA-0230 Rev P02
- CRQMP-FCBS-04-00-DR-AA-0231 Rev P02
- CRQMP-FCBS-04-01-DR-AA-0232 Rev P02
- CRQMP-FCBS-04-02-DR-AA-0233 Rev P02
- CRQMP-FCBS-04-03-DR-AA-0234 Rev P02
- CRQMP-FCBS-04-04-DR-AA-0235 Rev P02
- CRQMP-FCBS-04-05-DR-AA-0236 Rev P02
- CRQMP-FCBS-04-06-DR-AA-0237 Rev P02
- CRQMP-FCBS-06-01-DR-AA-0241 Rev P02
- CRQMP-FCBS-06-02-DR-AA-0242 Rev P02
- CRQMP-FCBS-06-03-DR-AA-0243 Rev P02

The submitted Salesians Landscape Plan, drawing number 1001 indicates a tarmac footpath ramp and steps between the proposed Salesians Triplex units and the proposed reservoir at the proposed Quarry Zone, it appears that the section of footpath which crosses the reservoir consists of steps. You are requested to clarify if this footpath is universally accessible and submit a cross section drawing at a scale of 1:50 clarifying the access. In addition, this drawing indicates a yellow shading, you are required to clarify the proposal for this yellow shaded area

Drawing CRQMP-MLA-ZZ-XX-DR-L-1009 has been prepared to clarify the accessible route and yellow hatch (which is the quarry wall face). Please note that the grey ramped access provides level access up to the Salesians upper level from the North Circular Road. A separate boardwalk route from North Circular Road provides level access into the PBSA/ Quarry plot. Landscape Drawing 2005 shows a cross section for the boardwalk over reservoir.

An annotated drawing has been prepared of the Salesians Ramp, Landscape Drawing 1009, highlighting the accessible route, with further annotations provided on Landscape Drawing 1001.

The submitted Planning Statement section 11.5 states that “the provision of 205no. apartment units and 20no. 3 bed triplex units requires the provision of 1,405sqm of communal open space. The total communal open space provision on the site is well in excess of this quantum at 2,419sqm or 8.7% of the net developable area”. However, the communal open space figures recommended and provided are different to the figures submitted in the Housing Quality Assessment. You are required to submit a site layout plan and/or floor plan for each communal open space provided in each zone at a scale of 1 :200, the drawings shall provide a schedule on the map, defining and details all the areas of communal open space.

Across the development proposal the provision of 205 no. apartment units and 20 no. 3 bed triplex units requires the provision of 1,399sqm of communal open space and not the 1,405sqm previously stated which included provision for the townhouses. Some 1,506.1sqm of communal open space has been provided to serve the apartments and triplex units but excluding the 9 no. Townhouses and PBSA. Please note that the 1,506.1sqm also excludes the additional provision at Stonetown Terrace to compensate for the reduced provision of private open space serving the houses.

A breakdown of communal open space is provided across the different zones as detailed below.

- Salesians: 76 no. 1 bed; 70 no. 2 bed and 20 no. 3 bed requiring a cumulative total of 1,050sqm of communal amenity space. As detailed on Drawing CRQMP-MLA-ZZ-XX-DR-L-1000 and Drawing CRQMP-MLA-ZZ-XX-DR-L-1001 a total of 1,076sqm of communal open space has been provided.
- Quarry Zone: As detailed on Drawing CRQMP-MLA-ZZ-XX-DR-L-1000 and Drawing CRQMP-MLA-ZZ-XX-DR-L-1005 a total of 730sqm of communal open space has been provided at grade, with an additional 210sqm provided in the form of 2 no. first floor level terraces (Drawing CRQMP-BMEA-2X-00-AA-2011 (rev P02)). This provision has been made notwithstanding there is no formal requirement for communal open space to serve PBSA.
- Stonetown Terrace: 6 no. studios; 12 no. 1 beds; 2 and 20 no. 2 beds require a total of 220sqm of communal amenity space. As detailed on Drawing CRQMP-MLA-ZZ-XX-DR-L-1000 and Drawing CRQMP-MLA-ZZ-XX-DR-L-1004 a total of 376.6sqm of communal open space has been provided. However, please note that some 156.5sqm of the total 380sqm provision, is required to offset the shortfall required in the private open space provision associated with the townhouses, thereby resulting in 220.1sqm of communal open space serving the apartments.
- O’Callaghan Strand: 9 no. 1 bed and 12 no. 2 bed units requires 129sqm of communal amenity space. The southern half of the roof space serving the apartment block, comprising 236sqm, functions as communal open space for the 21 no. apartments. Refer to Drawing CRQMP-FCBS-06-04-DR-AA-0244 P02.

The total communal open space provision on the site inclusive of the PBSA and total provision at Stonetown Terrace equates to 2,812sqm.

Drawing title “Stonetown Terrace Ground Floor Plan – Proposed”, drawing no. CRQMP-BMEA3X-00-DR-AA-2020 provides dimensions for each of the rear private gardens of the proposed Stonetown Terrace units, the proposed private rear open space does not correspond with the private open space area indicated in the Housing Quality Assessment. You are required to provide a minimum of 20sqm of private open space for the proposed Stonetown Terrace Units in accordance with Table 5.1 Minimum Private Open Space Standard for Houses, Sustainable and Compact Settlement Guidelines for the Planning Authorities.

Drawing no. CRQMP-BMEA-3X-00-DR-AA-2020 details the rear garden sizes of the 9 no. townhouses in Stonetown Terrace with 7 no. rear gardens comprising 17sqm, one garden of 25sqm and one garden of 32sqm. In considering the private amenity spaces serving the townhouses, consideration must also be given to the additional 3sqm of defensible private amenity space provided to the front of each unit. Thus, cumulatively, the minimum private open space serving the townhouses is 20sqm.

It is noted that the Sustainable and Compact Settlement Guidelines for the Planning Authorities states that “*private open space must form part of the curtilage of the house and be designed to provide a high standard of external amenity space in one or more usable areas” (Underline Our Emphasis). In accordance with the Guidelines the private open space serving the townhouses comprises 2 no. separate areas to the front and rear of the units, with both areas within the defined curtilage of the unit.*

The observations received requested landscaping of trees between the existing boundary wall to the rear of Clanmaurice Avenue and to the northern boundary of the Salesians and Quarry Zones. You are required to submit a revised landscaping plan at a scale of 1 :200 indicating a variety of semi-mature trees predominately native species such as mountain ash, birch, willow, sycamore, pine, oak, hawthorn, holly, hazel, beech or alder between existing rear boundary wall of Clanmaurice Avenue and the northern boundary of the Salesians and Quarry Zones.

The northern boundary to Clanmaurice Avenue gardens had been populated with a planting buffer, though some more trees can be planted around constraints. The path around Salesians cannot be moved closer to the building because of privacy, so this limits the planting of more trees to the north of this area. The PBSA boundary has many constraints including spatial confines of the quarry face and reservoir; levels; and habitat. As a result it is difficult to add more trees in this area. However, some additional planting is proposed adjacent to the quarry face notwithstanding its limited beneficial impact on third parties because of the level change.. In total 10 no. trees are proposed to be added along the northern boundary of the Salesians and Quarry Zones.

The drawing extract in Figure 2.0 rationalises the approach to planting on the northern boundary of the site whilst Drawing CRQMP-MLA-ZZ-XX-DR-L-1000 has been updated to show additional planting along the northern edge

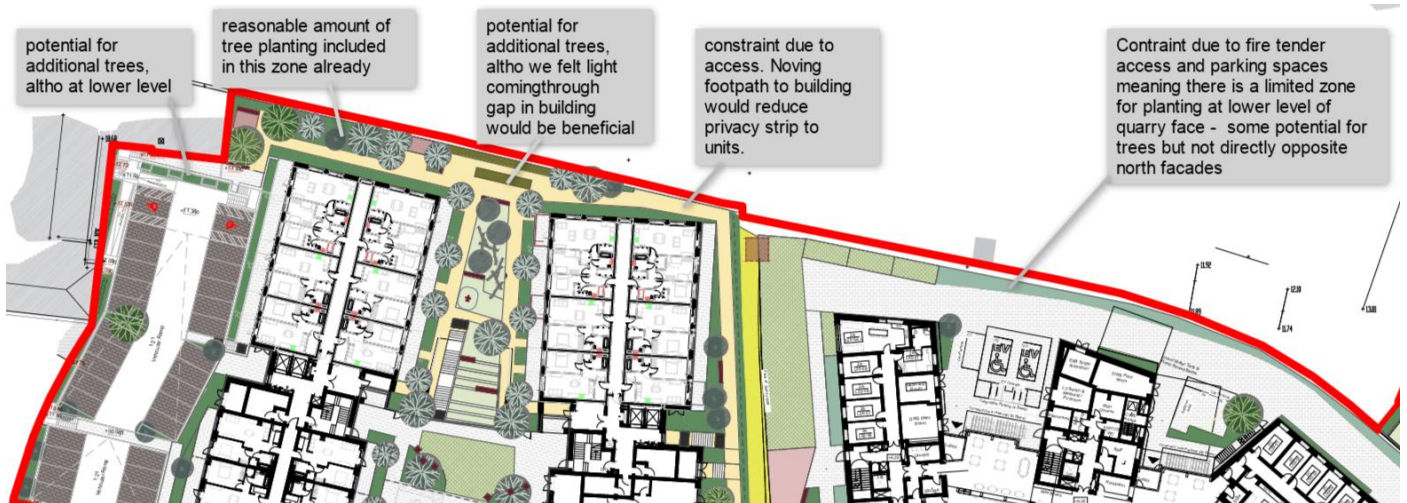


Figure 2.0 Extract of northern site boundary with landscape annotations

2.3 Flooding & Surface Water

It is noted that as part of the flood mitigation measures, the finished floor level of the North Circular Road will be raised, and it is not clear how the raised North Circular Road will tie in with the Shipyard site to the south. You are required to submit a cross section at a scale of 1:200 demonstrating the proposed finished floor level (FFL) of the Flaxmill Plaza entrance, the North Circular Road (NCR) and the Shipyard site (in the direction of North to South). In addition, submit a cross section west to east along the NCR indicating the finished floor levels along this route for the road and the public footpath and demonstrate compliance with DMURS for the revised North Circular Road upgrade.

Drawing CRQMP-MLA-ZZ-XX-DR-L-2009 has been prepared clarifying the levels on the North Circular Road and how the proposal ties into existing levels at the 4 no. section locations, as requested.

The Flood Risk Assessment, section 4.3 notes that existing residential buildings along O'Callaghan Strand will be protected through design work being commissioned by Limerick City & County Council as part of the Limerick (River Shannon) Flood Relief Scheme (FRS). It is further noted that the Cleeves Riverside Quarter (CRQ) protect team and Limerick Twenty Thirty (LTT) have been coordinating closely with Limerick City & County Council (LCCC) to ensure an integrated approach to flood protection along the Shannon and in particular at the junction of Stonetown Terrace and O'Callaghan Strand. As part of the Limerick (River Shannon) FRS, both projects will interface to provide a holistic design solution that will protect the existing buildings along O'Callaghan Strand against tidal flood inundation. Please provide an update on the proposed flood mitigation measures and detail whether the proposed development is reliant on these measures.

The flood defence of the Cleeves site, or associated accessibility, is not reliant on measures related to the Limerick City & Environs (River Shannon) FRS. As stated in Section 4.3 of the FRA report 'at the junction of Stonetown Terrace and O'Callaghan Strand, flood protection measures are proposed that will protect existing residential buildings along O'Callaghan Strand from inundation...as part of the Limerick (River Shannon) Flood Relief Scheme (FRS)' i.e. these FRS works are focused on protecting existing residential buildings only, not the Cleeves site.

While reference is made to existing properties located outside the red line boundary of the proposed Cleeves) development, in particular the predominantly residential properties along O'Callaghan Strand, these properties are not within the scope of the proposed development and are instead intended to be protected under the Limerick City and Environs (River Shannon) Flood Relief Scheme (FRS).

Furthermore, the design of the Cleeves development, including flood defence measures and site accessibility during flood events, has been undertaken on a standalone basis with respect to flood risk management. The proposed flood mitigation measures for the Cleeves development are independent of, and do not rely upon, the delivery of the Limerick City and Environs (River Shannon) FRS. This approach reflects both the current stage of development of the Limerick City and Environs (River Shannon) FRS and the differing programme timelines associated with the two projects.

The proposed Limerick City and Environs (River Shannon) FRS measures are specifically intended to address flood risk to existing residential properties along O'Callaghan Strand and do not form part of, nor are they required to facilitate, the flood protection strategy for the Cleeves site. The flood mitigation strategy for the Cleeves development has been designed to ensure an appropriate level of protection to the site and its users, independent of external schemes.

The Limerick City and Environs (River Shannon) FRS is currently at Stage 1 (Options Assessment, Scheme Development and Preliminary Design), with a number of technically viable options under consideration to provide flood relief to the required design standard for the area. Subject to ongoing development of these options, a programme of public consultation is anticipated to take place later in 2026 (subject to change). Further information on the Limerick City and Environs FRS, including project updates, is available at: <https://www.floodinfo.ie/frs/en/limerick/home/>.

Furthermore, and for total clarity, as per Section 4.1 of the 'Cleeves Riverside Quarter - Flood Risk Assessment' report (15 Aug 2025) it is stated that:

"Inundation within and around the site is effectively backwater tidal flooding from the River Shannon that extends into the site area / site vicinity. Accordingly, this is a flood-storage area only, particularly so given the flood mechanism. The raising of the North Circular Road or the construction of the embanked walkway in the Shipyard site will therefore have no impact on the surrounding tidal flood levels (implying no risk of adverse flood level increases to adjacent properties or land)."

To expand upon the above, if the Cleeves development goes ahead without the Limerick City & Environs (River Shannon) Flood Relief Scheme (FRS) works being constructed and in place, the same outcome is achieved i.e. the Cleeves development will have no impact on the surrounding tidal flood levels (implying no risk of adverse flood level increases to adjacent properties or land). This outcome also applies to any part of the Cleeves development constructed in isolation or in a phased approach e.g. just the North Circular Road ramp being constructed / in place, or just the Shipyard embanked walkway being constructed / in place, or both together constructed / in place.

2.4 Typographical Errors

Environmental Impact Assessment Report, Chapter 18 Material Assets Traffic & Transport makes references to a number of tables and figures which are labelled “error”, please amend. In addition, section 18.7 refers to a solar farm, please amend to include the correct reference.

Chapter 18 Material Assets Traffic & Transport has been amended to correct the labelling ‘error’ and to remove reference to the solar farm. These amendments have been identified in the Addendum EIAR prepared to accompany this further information response.

2.5 Transport

32 no. car parking spaces are indicated at the shipyard site on Drawing title “Proposed site layout plan”, however, 24 no. car parking spaces are noted in Section 7.6 Mobility Hub of the submitted Planning Statement. The Transport and Impact Assessment and Chapter 18 Material Assets Traffic & Transport of the Environmental Impact Assessment Report notes 26 car parking spaces at the Shipyard Site. You are required to clarify the correct number of car parking spaces for the proposed Shipyard Site and to amend associated assessments and amend drawing title “Proposed site layout plan” at a scale of 1:500.

As per the submitted Drawing CRQMP-MLA-ZZ-XX-DR-L-1002 and CRQMP-FCBS-ZZ-02-DR-AA-0115, there are 36 no. parking spaces provided on the Shipyard site, comprising 26 no. visitor car parking spaces and 10 no. residential car club spaces. The referenced 24 no. spaces in Section 7.6 of the Planning Statement is incorrect with the correct quantum detailed in Table 2.2 of the Planning Statement. The Traffic & Transport Assessment, EIAR chapter and the Drawings are correct.

For clarification, please see an extract of Table 4-2 in the Traffic & Transport Assessment below confirming parking numbers in Shipyard area.

Table 4-2 Total parking provision for the proposed development

Use / Zone		Car Parking		
		Standard Spaces	Accessible Spaces	Total Spaces
Residential	Salesians	45	4	49
	Stonetown Terrace	12	2	14
	O’Callaghan Strand	4	1	5
Student residential	Quarry PBSA	6	2	8
Dedicated residential / PBSA car club	Shipyard	9	1	10
Visitor	Shipyard	24	2	26*
Creche	Salesians	3**	1	4
Total				116
* temporary parking spaces				
** includes 2 parent and child spaces				

The Construction Environmental Management Plan estimates that there will be 100-150 (max.) staff present within the development site, per stage, during peak construction. If two stages of the proposed development were to advance concurrently, this could potentially result in up to 300(max) staff present.

The submitted documentation does not include any details of staff car parking for the construction phase. You are required to provide a site layout plan at a scale of 1:500 indicating the location of staff car parking.

Commensurate with the overall car parking strategy proposed for the site at operational stage, it is proposed to minimise car parking provision during construction. Cleaves is a city centre site which benefits from strong public transport accessibility and proximity to established public car parking facilities. All workers shall be encouraged to use alternative modes of travel and shall be briefed in advance of works commencing on site re car parking management and expectations. If necessary, construction workers will avail of public on or off street parking, similar to any other worker in a consolidated urban area.

Notwithstanding, during the initial stages of construction up to 36no. existing car parking spaces on the Shipyard site will be allocated to construction staff. This will accommodate construction staff for the enabling works, flood protection works, construction of the residential zones and public realm. For the final stage of construction – Stage 9 - which includes the Mobility Hub for the Shipyard site, this will require significantly less staff than the other work stages and it is anticipated that staff will be able to park on the shipyard site as construction progresses.

The overall number of spaces allocated at any one time may fluctuate and will be carefully managed by the contractor. These spaces are intended for short stays / visits to the site and will accommodate those workers dependent on a car. The quantum of temporary car parking proposed reflects the number of parking spaces to be provided in the Shipyard site at operational stage, and which has been fully assessed for the purposes of the Traffic & Transport Assessment. Further, it is generally presumed that construction staff arrival/departure times does not coincide with the network peak.

The 36 no. spaces to be utilised during construction are now detailed on Drawing CRQMP-FCBS-ZZ-02-DR-AA 0121.

A new pedestrian and cycle bridge is proposed to cross the River Shannon near the proposed site as part of LCCC's World Class Waterfront proposal. When built, this will further improve pedestrian connectivity to the site. You are required to provide details as to the proposed construction timelines.

Delivery of a new pedestrian and cycle bridge across the River Shannon is proposed by Limerick City & County Council in partnership with the NTA Active Travel team. The active travel bridge will enhance connectivity between the northern and southern riverbanks and is a key element of strategic active travel infrastructure for the city. The following programme outlines the anticipated timelines for the planning and construction phases of the proposed pedestrian and cycle bridge across the River Shannon:

- Consent Process Commencement Q1 2027
- Estimated Completion of Consenting Process Q3 2027
- Estimated Construction Commencement Q3 2028 (subject to funding)
- Estimated Completion: Q4 2029

The above programme is indicative and reflects the anticipated sequencing of the statutory consenting process and subsequent construction phase for the proposed bridge. A lead-in period is provided

between completion of the consenting process and commencement of construction to facilitate detailed design development, procurement, and contractor mobilisation.

O’Callaghan Strand is identified in the Limerick and Shannon Metropolitan Area Transport Study (LSMATS) as a secondary cycle route. Ennis Road and Sarsfield Bridge are also identified in LSMATS as primary routes. The Limerick city cycle network connects into the larger Cycle Connects network for County Limerick. You are required to provide details of timescale for the delivery of the LSMATS and to provide details on how the proposal links into the proposed development cycle routes.

BusConnects, managed directly by the NTA, is currently indicated for delivery from 2028 (excluding infrastructure elements) and extending to circa 2030 where infrastructure works are required, subject to programme progression.

The proposed Cleeves development aligns with LSMATS objectives, with cycle infrastructure designed to integrate with the existing and emerging Limerick City corridors. North Circular Road and O’Callaghan Strand are designated as secondary routes in LSMATS. Secondary routes are “a combination of off-road cycle routes, cycle lanes, shared bus and cycle lanes and traffic-calmed roads”. As shared streets, the design proposals for North Circular Road and O’Callaghan Strand within the development proposal, are consistent with the latter. These streets have been intentionally designed to reinforce pedestrian and cyclist priority. Narrow circulation areas (between 4.8 and 5.2m wide) and strategic positioning of landscaping will contribute to a traffic-calmed, low-speed environment.



Figure 3.0 Proposed Cycle Connects Map with Site Location Identified

North Circular Road and O'Callaghan Strand will provide a seamless connection to the primary cycle routes proposed along Sarsfield Bridge and Ennis Road, facilitating integration with the wider network as it is delivered and without reliance on the timing of specific interventions. It is further noted that the TUS Moylish to City Active Travel Scheme is currently progressing, with completion anticipated in Q4 2026, further enhancing connectivity in the area.

The Planning Statement refers to the proposed student accommodation will be used as tourist accommodation during the summer months. You are required to clarify the carparking proposals for the tourist accommodation use during the summer months and to clarify that the car parking requirements are in accordance with Table DM 9(a): Car and Bicycle Parking Standards Limerick City and Suburbs (in Limerick) Mungret and Annacotty and clarify which category the proposed tourism use will be assessed under in the Limerick Development Plan 2022-2028.

Section 2 of the Planning and Development Act 2000 as amended defines student accommodation as “a building or part thereof used, or to be used, for the sole purpose (subject to paragraph (b)) of providing residential accommodation to students during academic term times, whether or not provided by a relevant provider (within the meaning of the Qualifications and Quality Assurance (Education and Training) Act 2012), and that is not used, or to be used

(a) as permanent residential accommodation, or

(b) as a hotel, hostel, apart-hotel or similar type accommodation other than for the purposes of providing residential accommodation to tourists or visitors outside of academic term times” (Underline Our Emphasis)

The definition of student accommodation therefore includes its use outside of academic term times by tourists or visitors. There are no specific additional requirements in the Limerick Development Plan 2022 – 2028 or in national policy to facilitate the use of PBSA outside of term time. It is assumed that the accommodation will operate in a similar manner as to when students occupy the buildings. A total of 8 no. car parking spaces serve the PBSA and these spaces shall continue to be available outside of term time, to potential tourists or visitors.

Outside of term time, the PBSA could continue to be used by foreign language students visiting the many English Language Schools in the city. It could also potentially be used by sporting groups availing of sporting facilities in the city including those existing and proposed new facilities in the Technological University of Shannon (TUS), including a proposed new Velodrome at Clondrinagh. Tour groups travelling by bus or conference attendees are also another visitor type. Generally, visitors / tourists staying in PBSA type accommodation comprise of travel groups and not individuals. Such travel groups generally travel by shared public / private transport thereby reducing need for private car parking space on site.

Use of the PBSA outside of term time does not fall within any of the tourism uses indicated in Table DM9(a) of the Development Plan, as it is neither a hotel/aparthotel; hostel or B&B/Guesthouse. Perhaps the closest use would be that of a hostel which has a requirement of 1 space per 20 beds in the city centre (Zone 1) which would require a maximum provision of 13 no. car parking spaces. The proposed PBSA accommodates 8 no. spaces having regard to its city centre location and proximity to public transport. As noted in the Development Plan “*car free developments will be considered for all proposals in Zone 1 on a case by case basis*”.

Objective TR O6 in the Development Plan promotes a modal shift away from the private car towards more sustainable modes of transport including walking, cycling, carpool and public transport in conjunction with the relevant transport authorities by making walking, cycling, carpool and public transport more attractive, appealing and accessible for all. The proposed development facilitates connectivity within and outside of the development, providing connections through to the North Circular Road and Condell Road with the city centre.

Tourists / visitors availing of accommodation on a temporary basis outside of term time will be advised of limited car parking on site and shall be required to book parking in advance of arrival thereby ensuring that car parking is managed on site. Tourists / visitors will be advised to utilise public transport in so far as possible and will be advised of public car parking facilities throughout the city including multi storey car parks located in proximity to site, including Harveys Quay and Howley's Quay multi storey car parks located across the River Shannon from the Cleeves site.

The Traffic and Transport Assessment mentions proposed traffic calming measures at the Salesians Roundabout which will be undertaken by Limerick City and County Council under the Roads Traffic Act, 1994. I note these works are outside the scope of the planning application, however, you are required to provide details as to when these works will take place.

The modifications referenced are traffic calming measures, to be progressed via a Section 38 process under the Roads Traffic Act 1994. Following completion of detailed design, the Section 38 process typically takes approximately 8 weeks.

It is intended that any such traffic calming works will be implemented in advance of construction works commencing within the Salesians Development Zone.

2.6 Childcare

Section 1 1.5.1 Childcare Facilities of the Limerick Development Plan 2022-2028 sets out criteria for the Planning Authority to consider while assessing an application for childcare facilities. The planning application has not provided the details required. The applicant is requested to clarify the type of childcare service proposed, whether sessional, full day care, pre-school, afterschool etc., number of children/staff and hours of operation, whether there are adequate sleeping/rest facilities and adequate availability of indoor and outdoor play space. Submit a site layout plan at a scale of 1:500 and a floor plan at 1:200 indicating compliance with Limerick Development Plan 2022-2028 and with Childcare Facilities Guidelines for Planning Authorities.

A Childcare Assessment Report has been prepared by HRA Planning to comprehensively address this query and accompanies the further information response.

An annotated layout of the proposed creche facility is detailed in the Childcare Assessment Report with the creche detailed at a scale of 1:500 on the Site Layout Plan. A floor plan at a scale of 1:200 is detailed on Drawing CRQMP-FCBS-04-00-DR-AA-0231 P02 with an extract included within the HRA Planning Report.

The applicant is also required to clarify the number of such facilities in the area including a map highlighting the locations of childcare facilities within the vicinity of the subject site and demonstrate the need for an additional facility at that location. In addition, the applicant shall engage with Limerick Childcare Committee and submit documentation to demonstrate requirement for a childcare facility at this location.

The Childcare Assessment Report prepared by HRA Planning also addresses these issues, providing the number of creche facilities in the area including a map. The report also details correspondence received from the Limerick Childcare Committee, confirming the need for a creche facility in the area.

3.0 CORRECTION IN DENSITY FIGURE

Upon review of planning documentation and in the case of recent case law¹, it is noted that an error occurred in the calculation of the density on site, relating in particular to the density figure arising from the Purpose Built Student Accommodation (PBSA). The density figure, as submitted with the application for approval calculated the 270 no. bed PBSA on the basis that *4 bed spaces equate to 1 no. residential units as per the definition provided in the Sustainable Residential Development & Compact Settlement Guidelines*. This resulted in the equivalent of 67.5 no. residential units.

However, the PBSA includes 18 no. studio units and as per the recent cited case, those studios should be considered as residential units in their own right. Therefore, the PBSA actually results in the equivalent provision of 81 no. units and not the 67.5 no. units as originally calculated.


This correction has resulted in the overall density on the subject site increasing from 117uph to 123uph as detailed in Table 1.0.

Table 1.0 Revised Density Calculation		
SRSCG Appendix B Density Calculations	Note	Result
Calculate Net Site Area	This excludes Shipyard Site, Riverside Site, North Circular Road, Infiltration Gallery and Flaxmill as these are not intended for residential use. It includes 0.78 hectares of public realm	2.63 hectares
Calculate overall gross floor area		33,877sqm
Non residential gross floor area	Creche & Commercial Floorspace	680sqm
Residential gross floor area		33,197sqm
Residential as a portion of Development		98%
Site Area for Density Purposes		2.57 hectares
No. of Units	234 no. residential units plus 270 no. PBSA bedspaces (4 bedspaces equates to 1 residential unit)	315
Net Density		122.56 uph

¹ St. Josephs LRD2 Model Farm Road, Cork ABP-321978-25

It is submitted to the Commission that this increased density figure does not materially change the development proposal in the context of existing planning policy, as the density continues to fall within permissible limits, including the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities 2024 where residential densities in the range of 100-250 dwellings per hectare (uph) are generally applied in city centre locations such as Limerick; and the Limerick Development Plan 2022 – 2028 which promotes densities of 100+ units on zoned city centre sites.

Yours sincerely,



Mary Hughes MIPI
Director HRA PLANNING