



**Mullock & Sons**  
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## Draft Limerick Development Plan 2022-2028

Dear Sir/Madam,

We refer to the above noted development plan and wish to make the following submissions in reference to :

L2030 Spatial Plan Review undertaken by KPMG as an appendix to the Draft Development Plan.

Mainly below, whereby a key pedestrian route and the construction of a pedestrian bridge is highlighted as being down river of Limerick's Ted Russell dock and an obstruction to the navigation channel.

### 7. The Limerick Docklands

The Limerick Docklands present an opportunity for a long term transformational project on the scale of the Colbert Station Area that would serve to activate c.46Ha of riverside land in the city and foster new connections along the Waterfront and between the north and south banks. The Docklands are subject to a framework plan and require significant additional investigation of the feasibility of proposals. The expanded plan suggests that concerted efforts to investigate their potential are initiated as a plan making priority of Limerick 2030.

#### Development Proposals and Public Realm Initiatives:

- A primary public realm connection between the Limerick Docklands and the Gasworks Opportunity Site to the Colbert Station Area via the Georgian Quarter and the People's Park should be identified an incentivized improvement of dereliction of urban fabric along the route prioritized;
- Remediation requirements for development of the Gasworks Opportunity site should be clarified but the working assumption should be for an alternative employment generation use such as Data Centre at grade and office/ co-working on upper levels;
- Feasibility of the residential development of the Docklands south of Atlas Avenue should be explored;
- Feasibility of the development of Courtbarrack Road Corrib Oil Site as an opportunity site should be explored;
- Greenpark Racecourse site should be progressed as a major residential opportunity site along its northern extents and the opportunity explored for the feasibility of the provision of a c. 12Ha enterprise and employment opportunity site accessed from Dock Road to supplement the IDA lands at capacity in the Castletroy/ UL neighbourhood;
- Public realm links via Ballinacurra Creek to the Shannon Waterfront around the working docks should be explored with the aim of linking via the riverside to new residential development south of Atlas Avenue;
- Development of a new pedestrian bridge from Barrington Pier and Ted Russell Park to Atlas Avenue as a longer term aspiration to create new connections between the north and south sides of the river;
- Development at the Clonmacken Residential Gateway Opportunity Site should bookend Ted Russell Park to west and connect to the wetlands to the east via the Condell Road walking trail.



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The basis of our submission:

With reference to: the current Limerick City development plan and the incorporation of the Strategic integrated framework plan for the Shannon estuary incorporated per:

Quote

Variation number 5 to the Limerick City Development Plan 2010– 2016, which was adopted by the elected members on the 25<sup>th</sup> May 2015 comprised of the incorporation of the Shannon Integrated Framework Plan for the Shannon Estuary

Unquote

In which it is clearly stated that:

Quote

One of the key objectives to deliver this goal is:

To safeguard the core commercial shipping lane, port & berthing facilities, and critical navigational assets from inappropriate development.

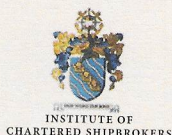
Unquote

Mullock & Sons (Shipbrokers) Ltd, having the wealth of knowledge obtained from many years (established in Limerick in 1778) of importing /exporting and operating within Limerick dock, submit that the proposed pedestrian bridge is an “inappropriate development” and will severely and irrevocably compromise the ability of the Port to meet the existing needs, by the obstruction of key port infrastructure. The current City Development Plan and the Strategic Integrated Framework Plan (SIFP) are clear that the Limerick Docks is a major asset to both the City and surrounding region. Where both allow for development of the general area “where the ability to deliver the primary use (maritime industry) is not compromised” and where the “primary objective” is the retention of the existing Port.

The need for quay space in limerick dock is on an increase, from 2014 tonnage figures of 370,000 tonnes of cargo, to 2017 tonnage figures of 769,000 tonnes – a similar continued rise in tonnage figures is expected in the near future, putting the already stretched resource under more demand. Any obstruction to the navigable channel within the river would have a detrimental effect on the ability of the port to operate, and seriously affect the ability of the businesses of the mid-west of the country to import and export goods, supplies and materials. For example the average size of vessel calling at the port in 2007 was 2900 dead weight tonnes whereby in 2020 the average size of vessel was over 4000 dead weight tonnes. Highlighting



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the increasing size of vessels in modern trade, and the need to increase the constraints of the navigation channel and not hinder it in any way by inappropriate development.

The construction of the proposed obstruction across a key maneuvering point for vessels on the approaches to Limerick Dock in the navigation channel will result in the current Marine based operations being forced to shrink or cease, thereby becoming uneconomic or abandoned in total, putting at risk current jobs and revenue to the City of Limerick. (according to the Shannon Foynes port company's, Limerick Docklands Framework Strategy, a total of "440 Full Time Employees generating €25.2 million" employment income).

In consideration of the application for the proposed inclusion of any obstruction to navigation we would like to highlight:

Limerick city development plan 2010/2016

Policy EDS.2

Policy EDS.3

Policy EDS.4

Policy EDS.5 Strategic Intergraded Framework Plan for the Shannon Estuary

Policy EM .11

To further quote the Strategic Intergraded Framework Plan for the Shannon Estuary

"Shipping is a key national economic driver accounting for 99% of Ireland's international trade. The Shannon Estuary is Ireland's premier deep water resource and a prime maritime transportation hub, lying at the heart of the Mid-West Region. Shipping and navigation in the Estuary has significant potential to stimulate further economic growth, in a balanced and sustainable manner"

Mullock & Sons (Shipbrokers) Ltd fully agree with this statement and want to protect Limerick dock from incompatible development which we believe will hinder or possibly prevent the trade through the port and the positive economic effect this trade has on the city & county of Limerick and the wider Midwest region.

Limerick dock import and export cargo help to contribute to the "local economy estimated to be €1.9 billion in 2014, supporting 3,372 Full Time Employees". (\*). Through experience and knowledge of the industry and the conduction of initial study's of the impact of the proposed obstruction to navigation and the ability of Limerick dock to accommodate current and future ships / tonnage of cargo it is our belief that an structure encroaching on the navigation channel to/ from Limerick Dock will restrict and hinder the ability



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of the port to operate as a port and restrict the businesses of the mid west region from operating in the region.

\* Economic Impact Assessment – published by - Shannon Foynes Port Company, W2 Consulting, August 2015

We therefore urge that the proposed inclusion of the construction of a pedestrian bridge or any other obstruction in the navigation channel be prevented from being developed to protect the current and future international trade gateway of Limerick Docks.

Yours Sincerely

Managing Director

Operations Manager

Financial Controller

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