

**WELCOMING THE EXPANSION (AND SEEKING ADDITION
TO PROPOSED AMENDMENT) OF THE ANNACOTTY
BUSINESS PARK, ANNACOTTY, CO. LIMERICK**

SUBMISSION TO THE:

***AMENDED DRAFT LIMERICK DEVELOPMENT PLAN
2022-2028 (MAP 4.2) (MA NO. 20)***

DATE: MONDAY, 11 APRIL 2022

Prepared for:

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EXECUTIVE SUMMARY

SUPPORT FOR THE EXPANSION OF THE BUSINESS PARK'S BOUNDARY (MA NO. 20) AND SEEK A MINOR ALTERATION TO INCLUDE SOME 0.83 HA OF LAND TO FACILITATE ACCESS TO THE PROPOSED ADDITIONAL LANDS

We welcome the expansion of Annacotty Business Park boundary – which had been in place since at least 2010 – by c. 7.3 ha as proposed by Councillors on 18 February 2022.

However, we now seek a minor addition to the proposal to include for the addition of some 0.83 hectares in order to facilitate access to the lands as it is considered that the proposed additional lands could be considered 'landlocked'.

Annacotty Business Park is considered a "key employment location" in the *Regional Spatial and Economic Strategy* for the South Region (RSES) for the period 2019-2031.

The primary reasons for why we support the boundary expansion are as follows:

1. The long-established Annacotty Business Park is fully let, including all buildings and lands;
2. Limerick and the South Region of IADITIONreland are expected to grow in enterprise and employment;
3. Annacotty Business Park is in a strategic and sustainable location for enterprise development; and
4. Annacotty Business Park provides the only enterprise and employment lands in the local area that caters for smaller businesses.
5. Having regard to the premises' site history, where ABP previously expressed difficulty in principle with the inclusion of unzoned land.

It is a Council objective to facilitate the sustainable development of Annacotty Business Park.

The expansion would facilitate that in principle, but for the Council's assurance, each application would be required to demonstrate on a case-by-case basis that its "scale, phasing and character [was] compatible with surrounding land uses and capacity of the road network".

Although we support the expansion of Annacotty Business Park by 7.3 ha, it is considered that these 7.3 hectares might be considered to be 'landlocked' effectively.

As such, our Client is concerned that the lands will not be accessible.

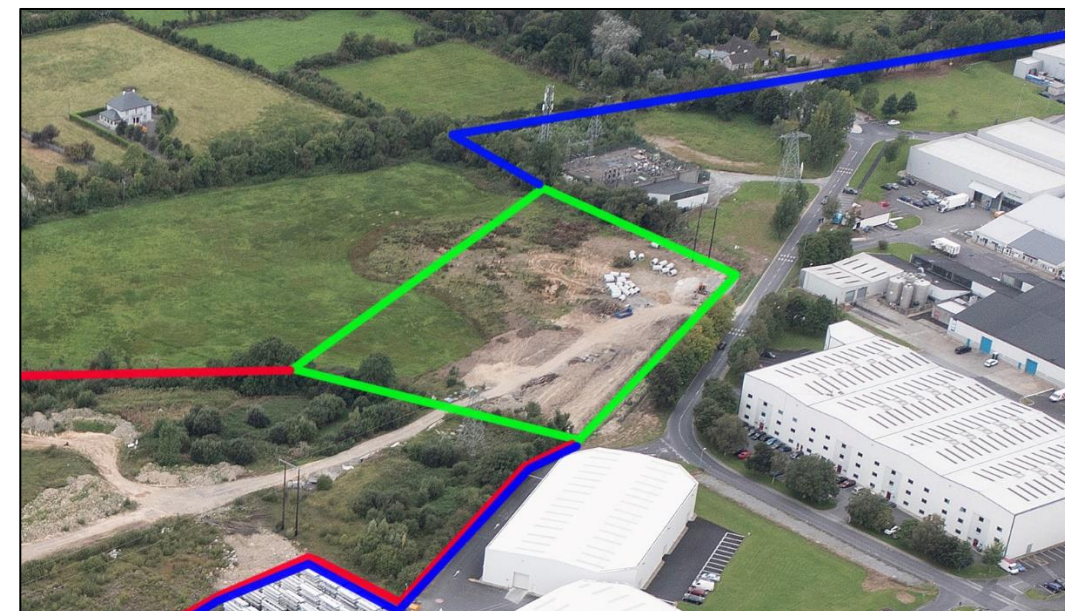
We seek that a minor amendment to the proposed boundary so that access to the additional lands can be facilitated.

The rectangular strip of land is traversed by power lines, but would facilitate a parallel two-way access route outside the powerlines' exclusion zone.

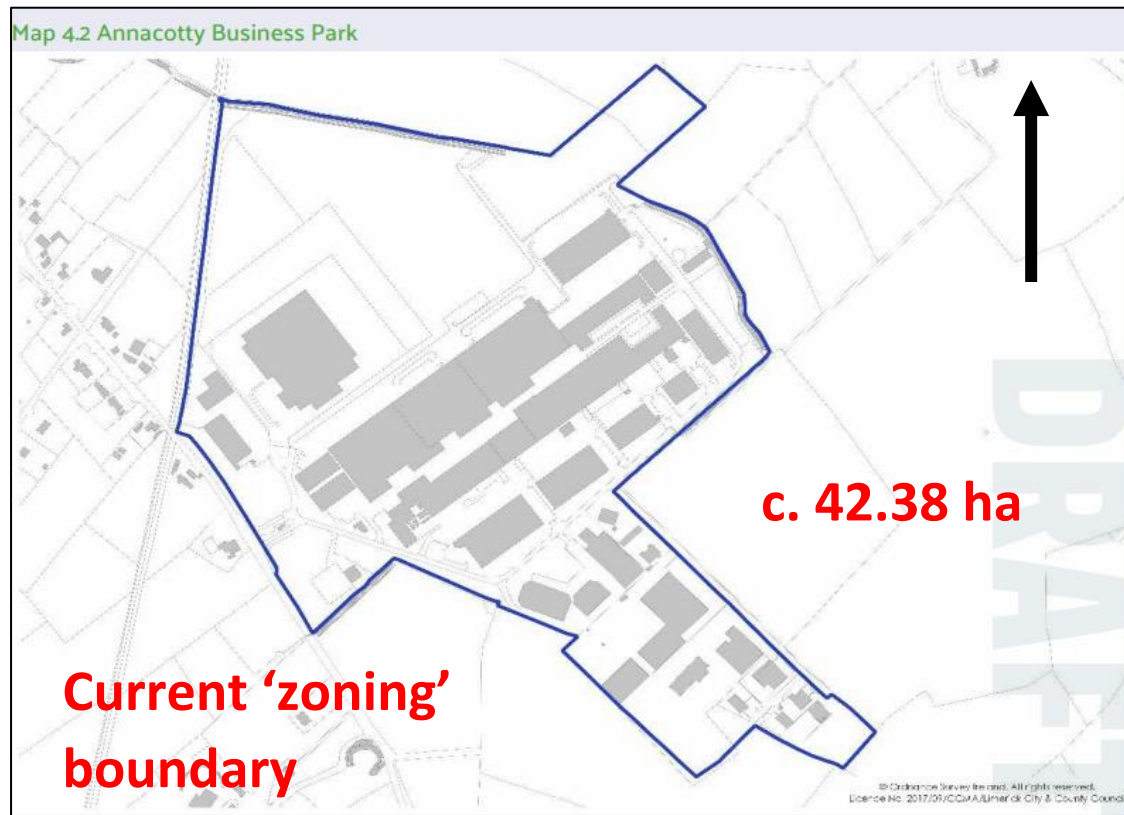
In other words, the additional lands would be used for infrastructural/access purposes only.



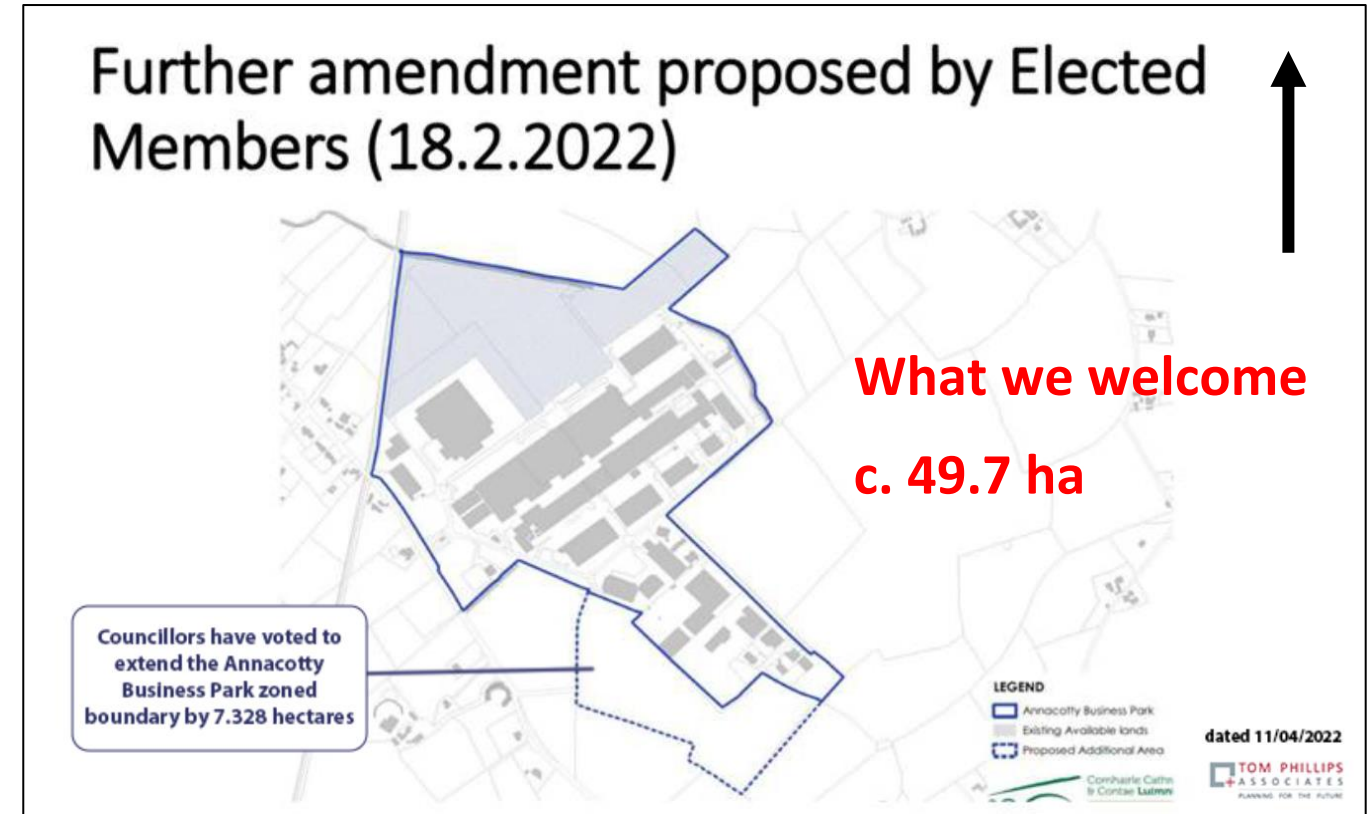
Strip of land traversed by power lines, but would facilitate a parallel two-way access route outside the powerlines' exclusion zone. (Source: BarrowCoakley, August 2021.)



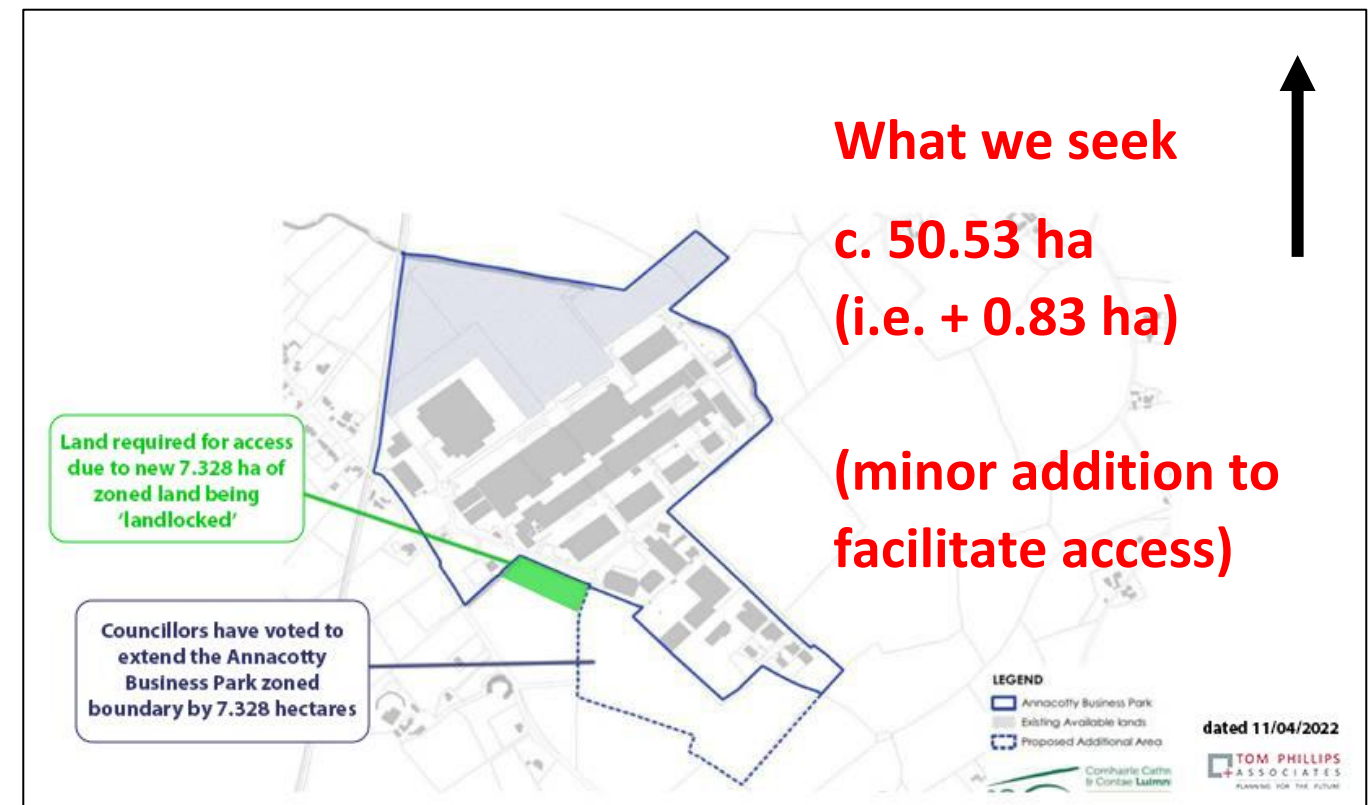
Strip of land traversed by power lines, but would facilitate a parallel two-way access route outside the powerlines' exclusion zone. (Source: BarrowCoakley, August 2021; annotated by TPA.)



Extract from the *Draft Limerick Development Plan 2022-2028* (Map 4.2) that outlines the boundary of the 'Annacotty Business Park'.



Annotated aerial image showing the proposed amendment that we support. (Source: Map.4.2; annotated by TPA.)

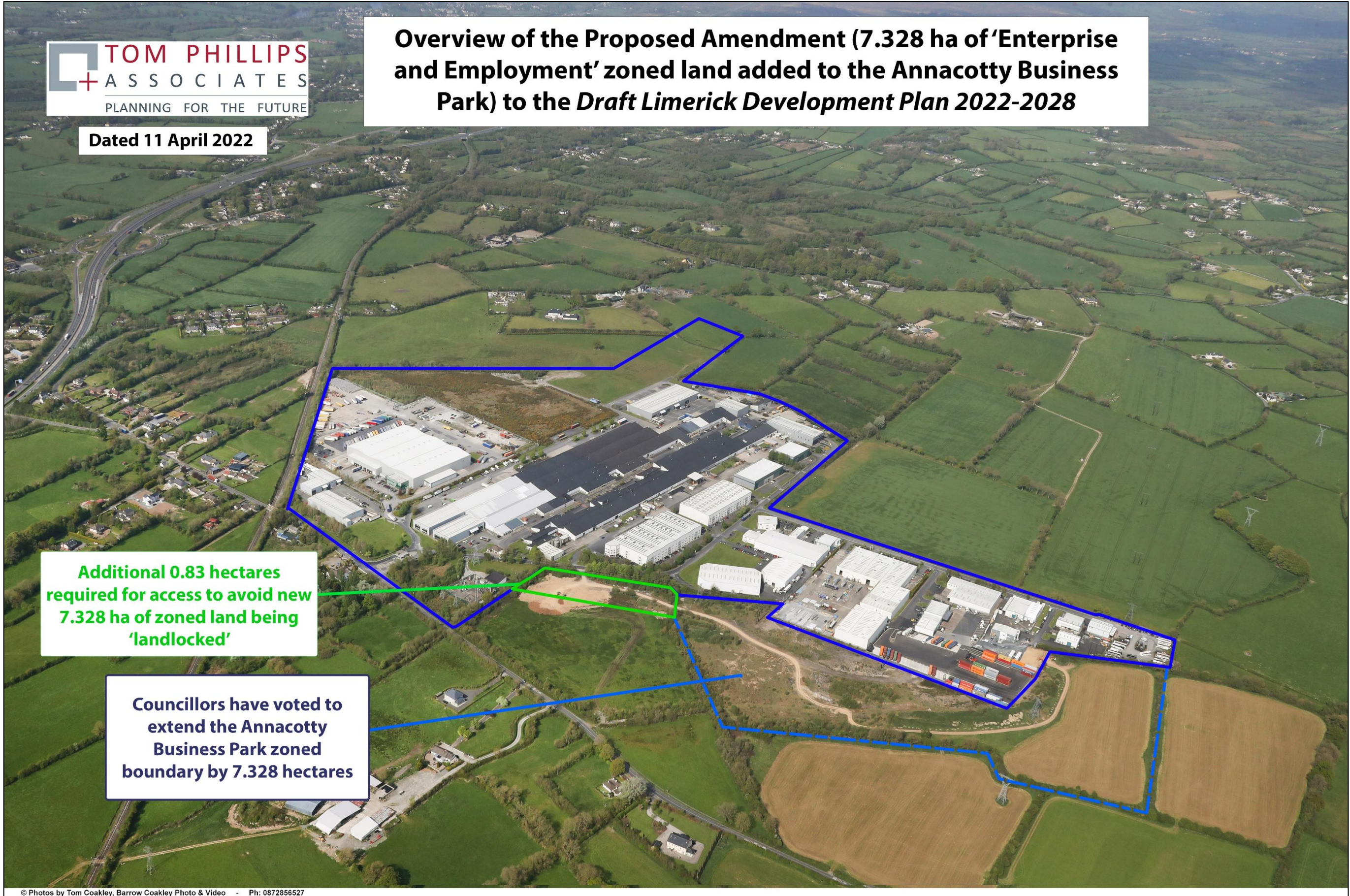


Annotated aerial image showing what we seek (minor alteration) the boundary of Annacotty Business Park to be. (Source: Map 4.2; annotated by TPA.)



Dated 11 April 2022

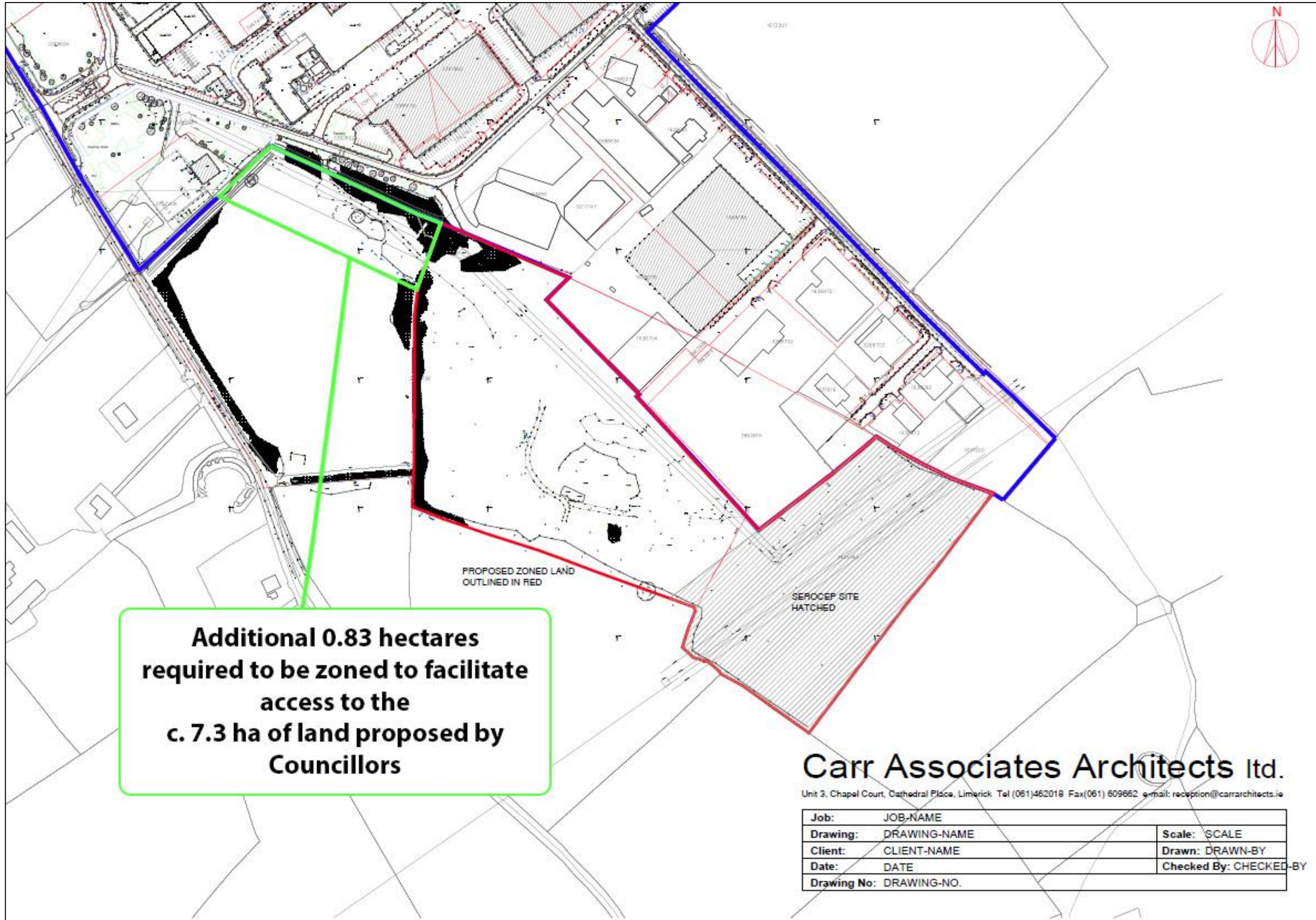
Overview of the Proposed Amendment (7.328 ha of 'Enterprise and Employment' zoned land added to the Annacotty Business Park) to the Draft Limerick Development Plan 2022-2028



Additional 0.83 hectares required for access to avoid new 7.328 ha of zoned land being 'landlocked'

Councillors have voted to extend the Annacotty Business Park zoned boundary by 7.328 hectares

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Forward/Strategic Planning
Economic Development Directorate
Limerick City and County Council
Merchants Quay
Limerick
V94 EH90

Monday, 11 April 2022

Annacotty Business Park

[By Online Submission]

Dear Sir/Madam

RE: SUBMISSION REGARDING THE PROPOSED AMENDMENTS TO THE DRAFT LIMERICK DEVELOPMENT PLAN 2022-2028

1.0 INTRODUCTION – PURPOSE OF THIS SUBMISSION (TO SUPPORT THE EXPANSION OF ANNACOTTY BUSINESS PARK AND TO SEEK A MINOR AMENDMENT TO THE PROPOSED BOUNDARY)

1.1 Introduction

Snowvale Limited¹ has retained Tom Phillips + Associates, Town Planning Consultants² in association with Carr Associates Architects³, to make a submission to the *Amended Draft Limerick County Development Plan 2022-2028* in respect of Annacotty Business Park. (Figure 1.1.)



In summary, we support the proposal for Map 4.2 to be expanded to embrace additional lands (MA No. 20), but seek that the boundary be extended to include for some 0.83 hectares to facilitate access to the proposed additional 7.3 hectares. (See Figures 1.2 to 1.5.)

Snowvale Limited is a key stakeholder regarding the economic development of the County and welcomes this opportunity to comment on matters that will support future economic growth in Limerick. (The current Business Park measures some 42.38 ha⁴, with the extension now proposed bringing the total to some 49.7 ha. (By comparison, Askeaton Business Park measures some 97.76 ha⁵, with limited development to date.)

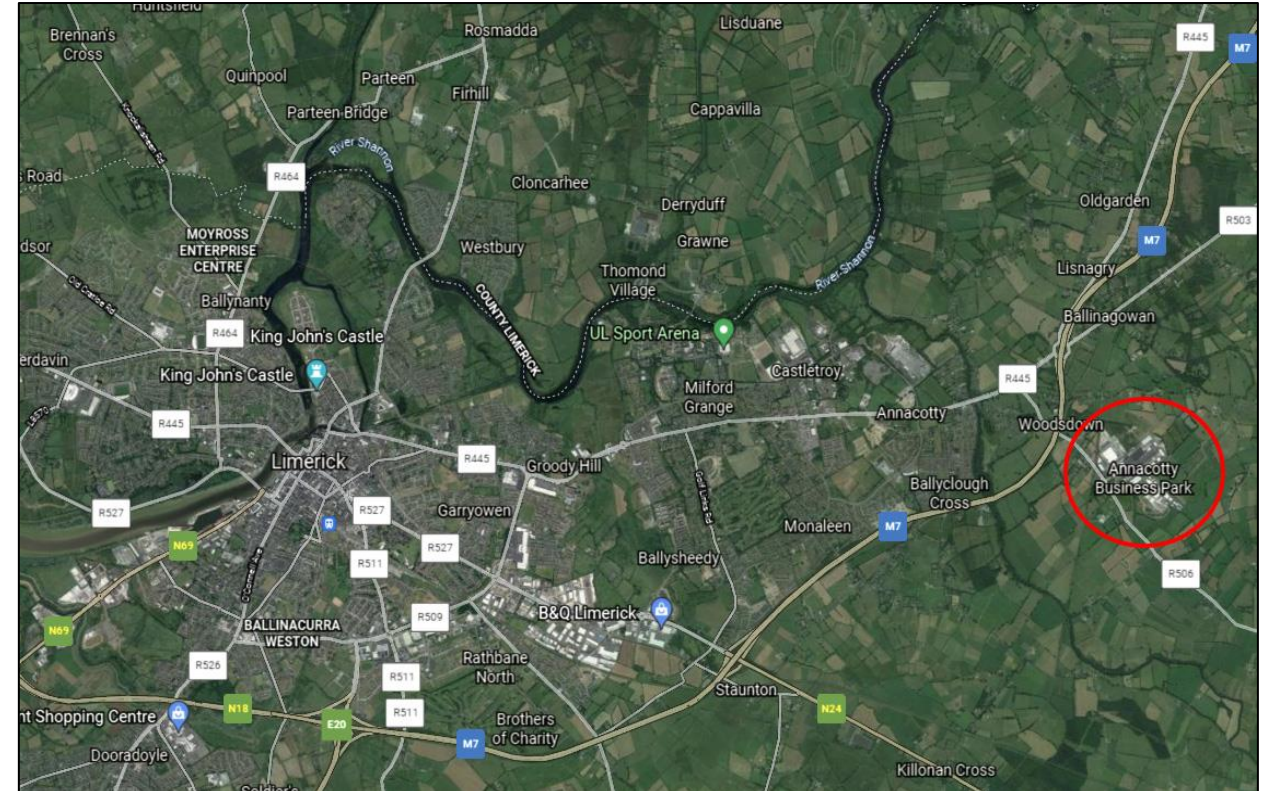


Figure 1.1: Location of Subject Lands. (Source: Google Earth, annotated by TPA.)

This document sets out the reasons why we contend the boundary of Annacotty Business Park should be extended to include the subject lands, namely:

1. The long-established Annacotty Business Park is fully let, including all buildings and lands;
2. Limerick and the South Region of IADITIONreland are expected to grow in enterprise and employment;
3. Annacotty Business Park is in a strategic and sustainable location for enterprise development; and
4. Annacotty Business Park provides the only enterprise and employment lands in the local area that caters for smaller businesses.
5. Having regard to the premises' site history, where ABP previously expressed difficulty in principle with the inclusion of unzoned land.

¹ 4 The Concourse, Beacon Court, Sandyford, Dublin 18, D18 V002.

² 80 Harcourt Street, Dublin 2, D02 F449.

³ Unit 3 Chapel Court, Cathedral Place, Limerick, V94 T8WC.

⁴ As stated in Objective ED 08 of the *Limerick County Development Plan 2010-2016*.

⁵ As stated in Objective ED 05 of the *Limerick County Development Plan 2010-2016*.



TPA previously submitted a non-site-specific *Pre-Draft Limerick Development Plan 2022-2028* Submission on Monday, 12 October 2020. That Submission sought the consideration of enterprise and employment expansion in the Limerick City and County area.

TPA further submitted a *Draft Limerick Development 2022-2028* Submission on Monday, 6 September 2021. That Submission sought an additional c. 42 ha of land for the Annacotty Business Park.

1.2 The need to sustain and enhance existing enterprise and employment

The primary reference to the 'zoning' of the Business Park is made in Map 4.2 of the *Draft Development Plan*. (We understand that Chapter 4 has since been amended as Chapter 5.)

Thus, we contend that to facilitate the proposed expansion, Limerick City and County Council should extend this boundary to subsume more land to enhance existing enterprise and employment.

We support the Proposed Amendment to increase the boundary of the Business Park by c. 7.3 ha; however, we seek that a minor alteration be made so that the access can be facilitated to that additional land.

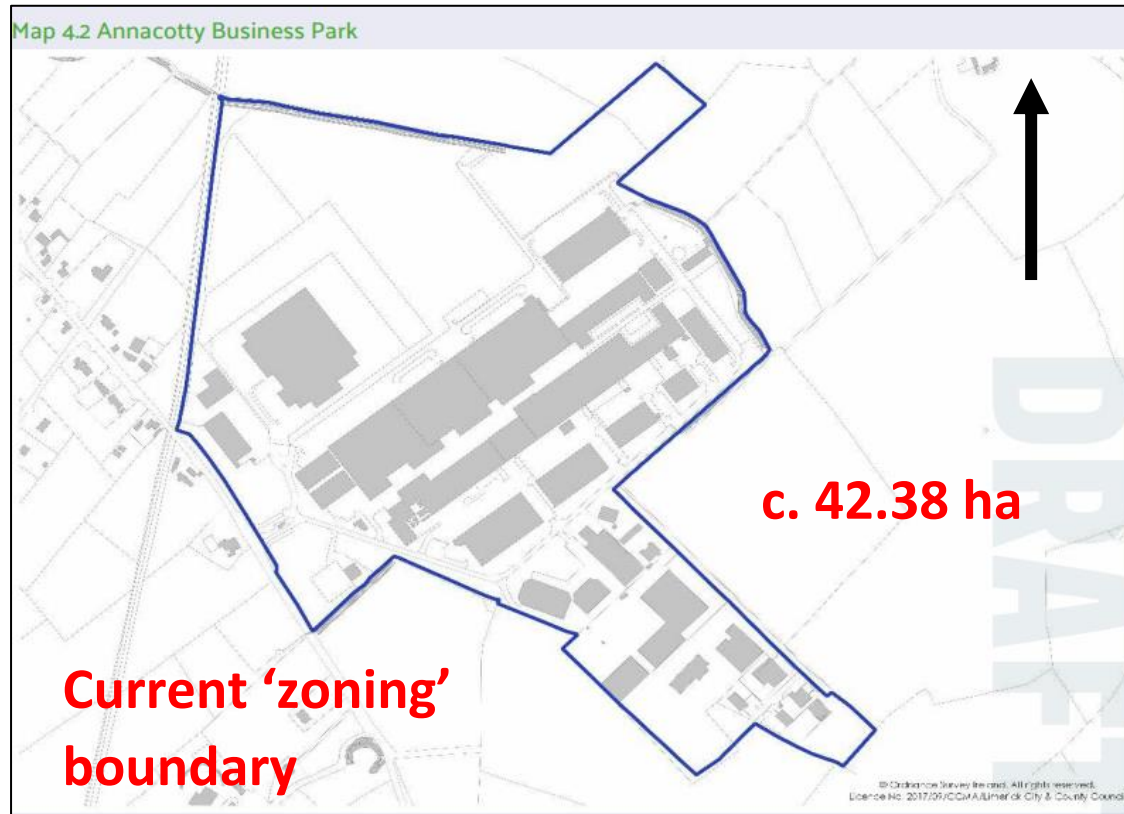


Figure 1.2: Extract from the *Draft Limerick Development Plan 2022-2028* (Map 4.2) that outlines the boundary of the 'Annacotty Business Park'.

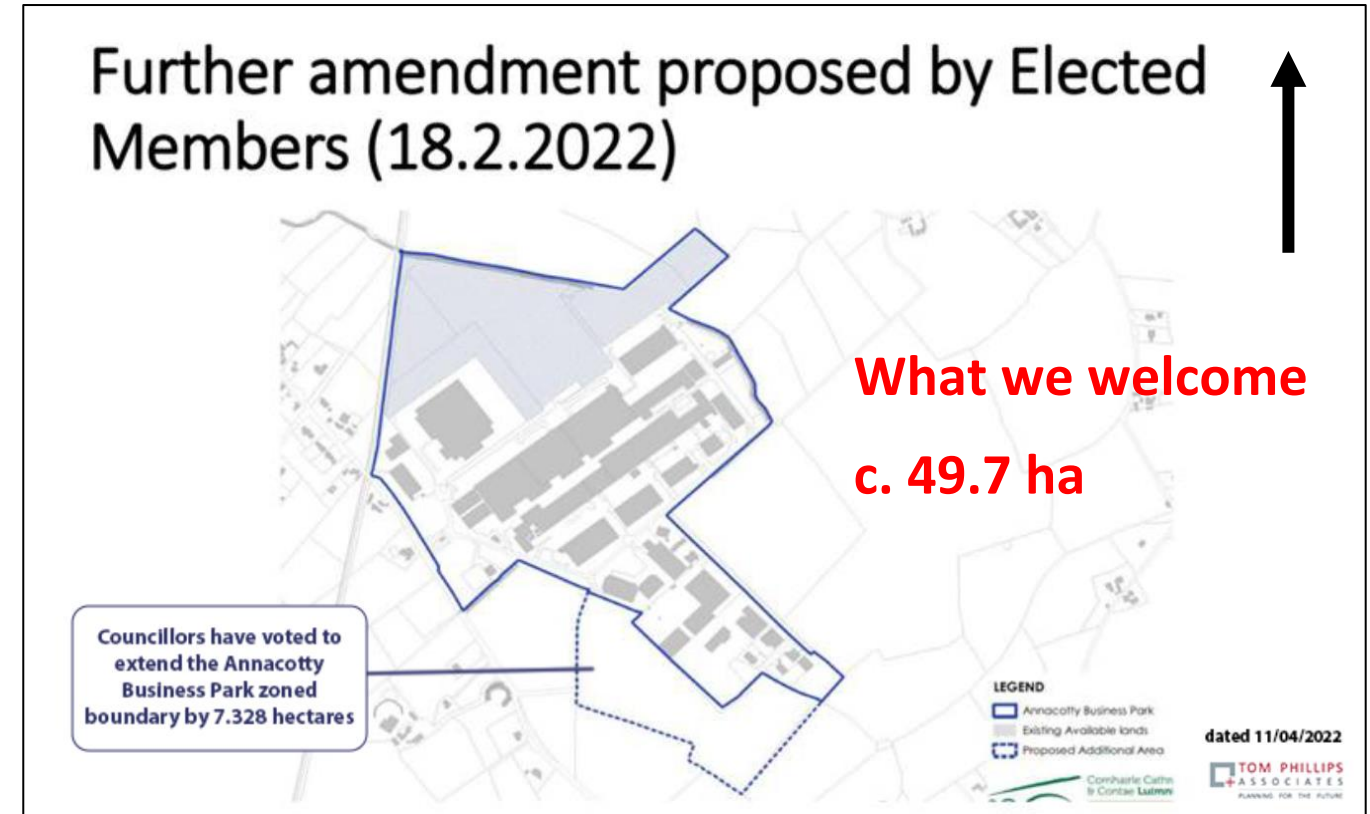


Figure 1.3: Annotated aerial image showing the proposed amendment that we welcome. (Source: Map.4.2; annotated by TPA.)

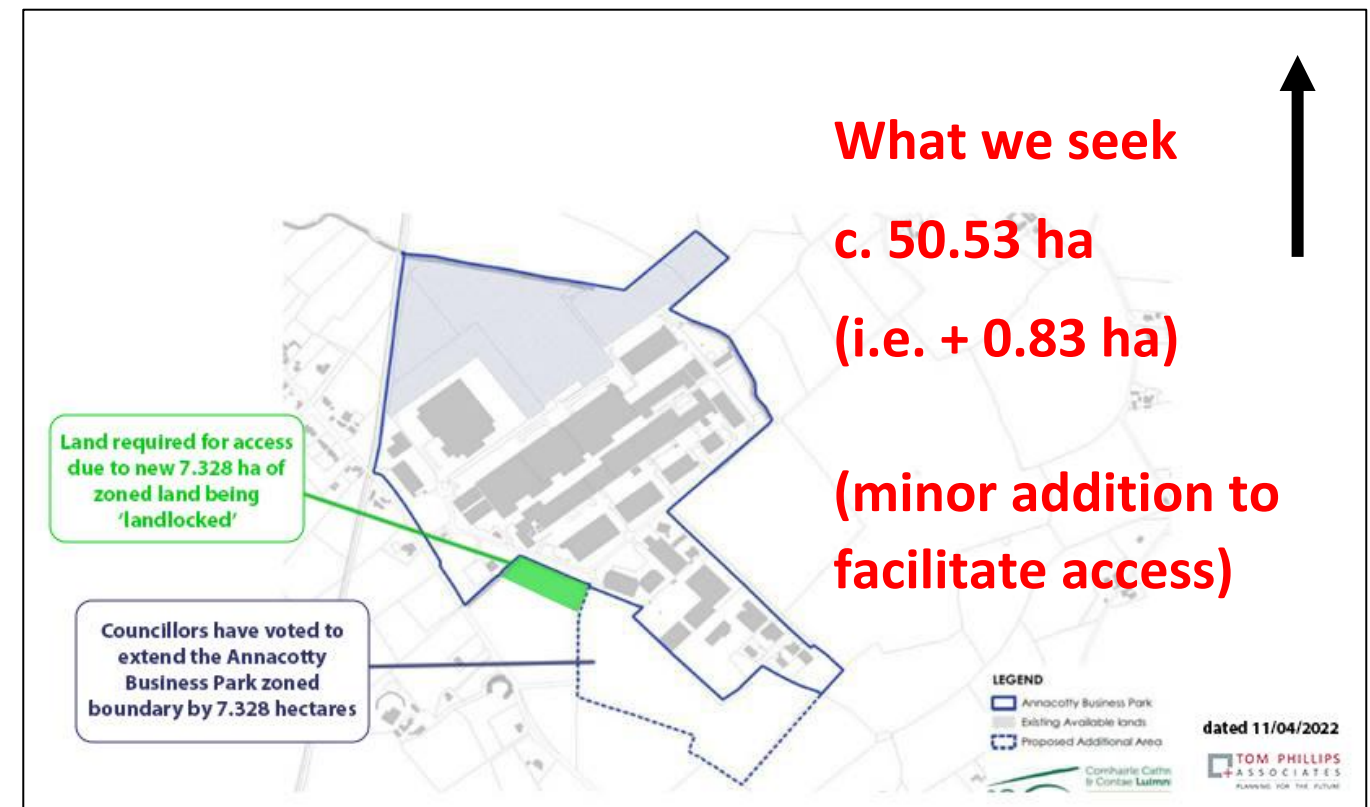


Figure 1.4: Annotated aerial image showing what we seek (minor alteration) the boundary of Annacotty Business Park to be. (Source: Map 4.2; annotated by TPA.)

1.3 Location of Subject Lands – no existing road frontage

The additional lands (c. 7.3 ha as stated by Limerick County Council) are located to the south/southwest of Annacotty Business Park.

The additional lands do not border the R506 Regional Road, but rather border exclusively the existing Annacotty Business Park to the south; it is considered that this makes the additional land effectively 'landlocked', which would not readily facilitate the expansion of the Business Park. (See Figure 1.5.)

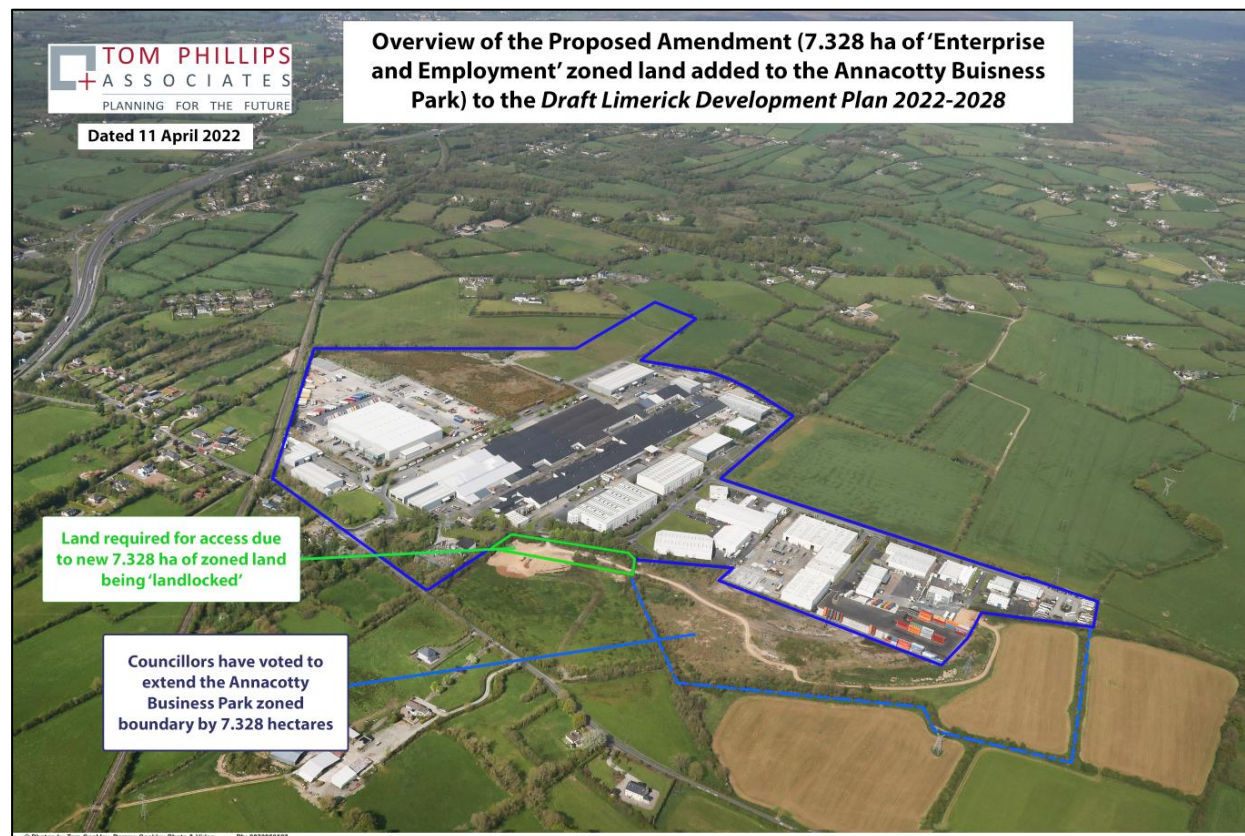


Figure 1.5: Aerial photo showing Subject Lands and their surrounding contexts. (Source: Barrow Coakley, September 2021; annotated by TPA.)

The Business Park is currently fully let.

1.4.1 Why zoning is important

We note that Limerick County Council granted permission for 32 No. industrial buildings in 2009. However, ABP subsequently refused permission partially on the grounds on the non-zoning of the lands, and for infrastructural reasons that have since been addressed.

We have secured permission for zoned lands that have required access from one parcel of zoned land to another across unzoned lands, but that is not ideal. Lessons must be learnt from ABP's 2009 Decision.

1.4 Current Status of Annacotty Business Park

The existing developed Business Park is approximately 34.3 ha in size⁶ and is characterised by large double height units with surface parking and ancillary landscaping and vehicular and pedestrian route. The 'zoned' land as per the 2016 *Development plan* is c. 42 ha.

The site includes a number of large external storage yards associated with the onsite logistic businesses. The boundaries of the site generally comprise mature hedgerows.

⁶ The area of the Business Park has been estimated by the TPA internal Geospatial Analyst .



2.0 CONCLUSION

It is recognised that the continued economic growth of Limerick is a key issue for the forthcoming *Limerick Development Plan 2022 – 2028* and for stakeholders within the County.

There is a need to ensure that a sufficient quantum of zoned lands is available to attract future investors and to ensure that existing successful enterprises can grow and expand their current operations.

We support the expansion of Annacotty Business Park boundary – which has been in place since at least 2010 – onto some additional 7.3 hectares of lands to the south/southwest.

We seek a minor alteration to the proposal to include for some 0.83 hectares in order to facilitate access to the lands as it is considered that the proposed additional lands would be 'landlocked'.

To reiterate, the reasons for why we contend the boundary should be expanded are, namely:

1. The long-established Annacotty Business Park is fully let, including all buildings and lands;
2. Limerick and the South Region of Ireland are expected to grow in enterprise and employment;
3. Annacotty Business Park is in a strategic and sustainable location for enterprise development; and
4. Annacotty Business Park provides the only enterprise and employment lands in the local area that caters for smaller businesses.
5. Having regard to the premises' site history, where ABP previously expressed difficulty in principle with the inclusion of unzoned land.

We seek that a minor amendment to the proposed boundary so that access to the additional lands can be facilitated.

The rectangular strip of land is traversed by power lines, but would facilitate a parallel two-way access route outside the powerlines' exclusion zone.

In other words, the additional lands would be used for infrastructural/access purposes only

We look forward to further engagement on this issue as part of the public consultation process for the *Draft Development Plan*.

I would be grateful to receive a formal acknowledgement of this submission in due course. If any queries arise in relation to this matter, please do not hesitate to contact the undersigned directly at this office.

Yours faithfully

Tom Phillips
Managing Director
Tom Phillips + Associates

Encl.

Appendix A: Memorandum on current status and history of Annacotty Business Park

APPENDIX A – CURRENT STATUS AND HISTORY OF ANNACOTTY BUSINESS PARK

Some of the existing tenants include⁷:

- Serocep;
- STL Logistics; and
- GLS.

The Business Park accommodates a range of existing warehousing, industrial and commercial uses, including:

- Café.
- Childcare facility.
- Couriers.
- Electronics Manufacturing.
- Food production.
- Fuel supply and distribution.
- Logistics and software management.
- Medical technology manufacturing.
- Print manufacturing.
- Veterinary product distribution.
- Other.



Figure A.1: Entrance to Annacotty Business Park. (Source: Google Streetview.)



Figure A.2: Example of businesses: Transport Logistics Centre. (Source: TPA.)

⁷ For example, Serocep is a leading laboratory diagnostics specialist in microbiology, histopathology and environmental testing.



Figure A.3: Aerial image of Annacotty Business Park. (Source: BarrowCoakley, September 2021.) (See also Appendix A.)



Figure A.5: Aerial image of Annacotty Business Park. (Source: BarrowCoakley, September 2021.)



Figure A.4: Aerial image of Annacotty Business Park and its surrounding context. (Source: BarrowCoakley, September 2021.)

The Business Park is fully let, including all buildings and lands, and there is growing interest from investors to provide further enterprise and employment facilities in the Business Park.

The Business Park 'zoning' boundary must be expanded to fulfil this enterprise growth potential.

History of Annacotty Business Park – long-established industrial and employment use – c. 50 years

Review of historic mapping shows that the existing defined Park straddles two historic townlands: Grange Upper and Biddyford, respectively. (Figure 1.11.)

We understand that the Park evolved from the former Ferenka Plant, which in the 1970s was Limerick's largest employer with some 1,400 No. workers. (The Plant was synonymous with the kidnapping of its Managing Director, Dr Tiede Herrema in October 1975.)

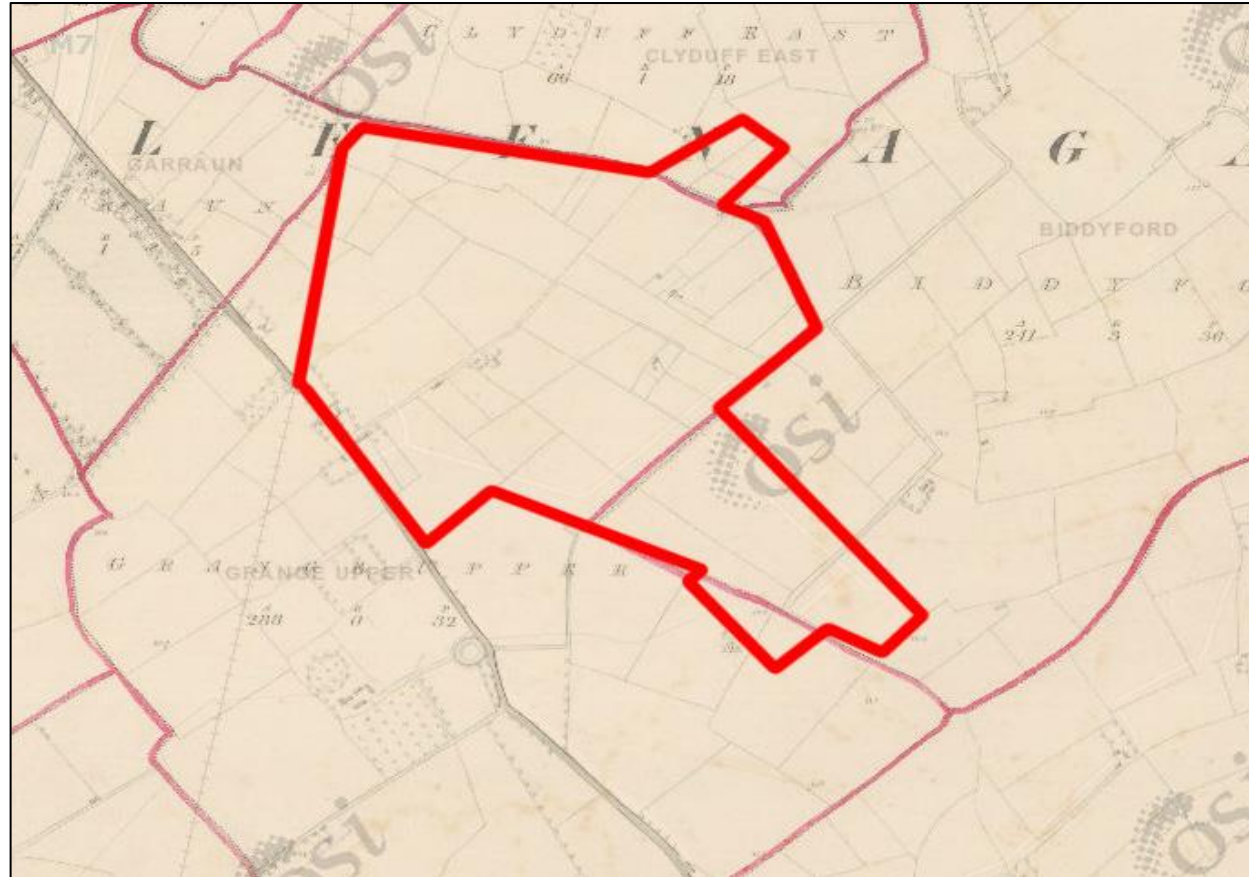


Figure A.6: 6-inch Historic Map showing indicative location of existing Annacotty Business Park 'zoning' boundary. (Source: Ordnance Survey Ireland Maps 2020, with dark red annotation by TPA, 2020.)

According to contemporary articles⁸, the plant operated from March 1972 to December 1977, and was involved in the manufacture of steelcord for use in radial tyre production. (Figure 1.12.)

The IDA was a key driver in the establishment of the plant from 1969, and the work force grew to a high of 1,500 by the end of 1973, reducing to 1,000 by the end of 1975.

Some 1,400 No. were employed for the construction phase.

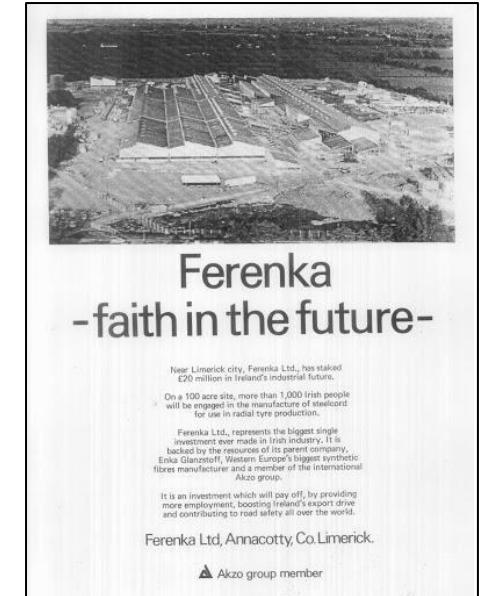


Figure A.7: Construction of the Ferenka Factory.

(Source: <http://www.limerickcity.ie/Library/LocalStudies/LocalStudiesFiles/1/IndustryIndustries.>)

⁸ Browne, V., Feeney J. and Kinlay H., (1977) 'Don't cry just yet for Ferenka' *Magill* 1ST December 1977 available at <https://magill.ie/archive/dont-cry-just-yet-ferenka>