



h w p l a n n i n g

## **Submission to the High Level Goals of the Limerick Local Economic and Community Plan (LECP)**

Provision for Enterprise & Employment Expansion to  
Accommodate Future Strategic Growth Opportunities

Client IDA Ireland

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**Connecting places.**

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# 01 Introduction

## 01.1 Submission Purpose

This submission has been prepared on behalf of IDA Ireland. It has been prepared in response to Limerick City and County Council’s invitation for submissions to the Stage 2 - Public Consultation of the Local Economic and Community Plan (LECP) for Limerick City and County. This submission is in response to the LECP Vision and High Level Goals, and specifically to Sustainable Economic Development Objective (SEDO) no. 5 in relation to *‘Business expansion, targeting high value added sectors & clustering’* and no. 6 regarding *‘Business infrastructure, investment & connectivity’*.

IDA Ireland considers that there is a longer-term strategic need for a significant landbank for larger scale manufacturing FDI of the type and scale required to provide sustainable and high value employment to underpin Limerick’s projected future population growth as set out in the National Planning Framework (NPF) and Southern Regional Spatial and Economic Strategy (RSES). The Shannon Estuary Economic Taskforce 2022 final report concurs and amongst its key actions identifies the potential necessity for the identification of additional suitable sites, over and above what is already available, for the establishment of industries of significant scale that will be attracted to the region by the availability of affordable clean energy’.

IDA Ireland welcomes the Council’s acknowledgement of this strategic requirement in the employment policies and objectives of the LECP, in particular of SEDO No. E5 and SEDO No. E6, in the objectives as outlined below. These recognise the strategic requirement for sufficient capacity to continue to attract FDI to Limerick through the provision of appropriate scale zoned lands to cater for the future development to meet the needs of the mid-west region. They concur with the Council that these strategic employment locations should be proximate to existing employment clusters, facilitate compact growth and sustainable travel and should be of a scale to support high tech manufacturing.

<b>SEDO No. E5</b>	<b>Business expansion, targeting high value added sectors &amp; clustering</b> <i>Support established businesses in growth sectors, to expand their businesses in Limerick and grow their workforce</i>
<b>Questions</b>	<ul style="list-style-type: none"><li>• What are the priority actions to continue to attract enterprises in knowledge economy sectors to Limerick and support their expansion?</li><li>• What actions are needed to grow successful indigenous enterprises in the knowledge economy?</li><li>• What locations in the city and county should be prioritised for these industries</li></ul>

<b>SEDO No. E6</b>	<b>Business infrastructure, investment &amp; connectivity</b> <i>Plan and develop business accommodation such as modern office accommodation, factory and other types of space, continue to bring foreign direct investment to Limerick and work to improve the road, rail, air and digital connectivity needed to attract businesses to set up and expand existing operations in Limerick</i>
<b>Questions</b>	<ul style="list-style-type: none"> <li>• What are the priority actions in business infrastructure, transport and other infrastructures to continue to attract investment to Limerick?</li> <li>• Are there priority locations for such infrastructures – what actions and in which locations?</li> </ul>

We note the questions raised in the consultation document in relation to these SEDOs (refer above). Given IDA Ireland’s extensive experience in this area, and with the view to achieving these ambitious NPF and RSES employment targets, IDA Ireland’s would like to emphasise their willingness to work with the Council in responding to the questions raised in the Policy Framework relating to which locations should be prioritised for future enterprise development and what actions are required to continue to support the future development of these sectors. This partnership approach is in line the CDP policies (ECON P2) and key actions of the Shannon Estuary Economic Task Force (SEETF) Interim Report 2022.

## 01.2 Submission Context

IDA Ireland previously made submissions to the Limerick Development Plan Review highlighting the necessity for appropriately zoned employment zoned lands to meet the ambitious NPF and RSES employment targets for the region. Our client welcomes the publication of the consultation document on the LECP Vision and High Level Goals. They consider this a critical juncture in the future growth of Limerick City and Environs. The policy context for the area has evolved significantly since the merging of Limerick City and County in 2014, with the NPF targeting population growth for Limerick City and Suburbs of between 47,000 and 56,000 in the period to 2040 and the RSES identifying the Limerick City Metropolitan Area as a priority growth area and setting out to support growth of at least 50% for by 2040 to enable it to achieve its potential to become a city of scale. IDA Ireland concur, with the CDP and the LECP consultation document which both acknowledge that this future growth is dependent on a range of factors, central amongst which are indigenous enterprise, foreign direct investment and innovation.

IDA Ireland is the state agency with responsibility for winning Foreign Direct Investment (FDI) for Ireland. These investments cover a broad spectrum of activities including manufacturing, research development & innovation (RD &I). This is in addition to business services and results in significant capital investment, employment creation by multinational client companies in Ireland and significant return to the Exchequer.

In 2021 direct employment in IDA client companies reached 275,384, representing an increase of 6.5% from 2020 and the highest increase in FDI employment in a single year. IDA Ireland would like to highlight the significant recent large-scale investment secured by our client in the Mid-west, as announced in 2022.

Limerick and the Mid-West is now recognised as a global cluster location of choice for advanced manufacturing including both life science and semiconductor manufacturing multinationals such as Eli Lilly, Analog Devices, Johnson and Johnson Visioncare Ireland, Edwards Lifesciences Ireland, Cook Medical, Stryker Corporation and Regeneron Pharmaceuticals. It has also developed a strong professional services and technology ecosystem including companies like Dell, General Motors, Northern Trust, WP Engine amongst others.

The region is very well positioned to continue to attract new FDI investment and IDA Ireland will continue to collaborate with all stakeholders and parties in the Region to achieve this objective under the Regional Enterprise Action Plan. There is need to ensure sufficient greenfield sites of scale and appropriately zoned lands to add to a robust value proposition for international companies evaluating Ireland and the Mid-West region as a suitable location to support and attract future investment.

Factors which hitherto underpinned the Mid-west region's potential to attract a significant quantum of employment and the attractiveness of the region for FDI were emphasized in the context of the IDA 2021 Strategy, which stated that:

*'The FDI performance in the region has been strong over the past five years with employment among IDA clients increasing by 29%. The Mid-West Region has an impressive base of existing FDI companies across key industry sectors, with recent investments of scale in Technology, Life Sciences and International Financial Services. The Mid-West includes Limerick, one of the four regional cities outside Dublin. The thriving, dynamic and innovative enterprise base in the region is supported by third level institutes of scale, the University of Limerick and Limerick Institute of Technology, and by SFI Research Centres.'*

Fundamental to maximising the impact of FDI in the region and to ensuring the continued significant large-scale investment will be the availability of sufficient zoned, serviced and accessible land in strategic locations. This is the principal factor that will ultimately establish Limerick as a compelling location option for multinationals in the mobile FDI marketplace.

The availability of land zoned for industrial and enterprise development in advance of demand is a key element to attract foreign direct investment to Ireland and to facilitate employment growth in Limerick and the Mid-West region commensurate with projected population increase. The development of identified lands can then be plan-led over a medium-term horizon in collaboration with national agencies and local planning authorities.

A review of availability of suitable lands in the Limerick Shannon Metropolitan Area (Limerick), noted the fact that the established locations of Raheen Business Park and the National Technology Park (NTP), Castletroy have limited remaining capacity and potential to support new greenfield manufacturing.

Our client requests that the Council works in partnership with IDA Ireland to make provision for strategic employment growth opportunities, as required, at appropriate sites. This is in accordance with CDP policy ECON P2:

*'to promote, facilitate and enable sustainable enterprise and economic development, in line with the policies and objectives as set out in national, regional and local strategies.'*

It also aligns with Action 11 of the Shannon Estuary Economic Task Force (SEETF) Interim Report 2022:

*'Partner with Local Authorities and State Agencies to identify any additional suitable sites, over and above what is already available, that may be required for the establishment of industries of significant scale that will be attracted to the region by the availability of affordable clean energy'.*

### 01.3 Submission Request

- *IDA Ireland requests to work in partnership with the Council in the development of the LECP to promote, facilitate and enable sustainable enterprise and economic by ensuring the availability of appropriately zoned employment lands of scale.*



# 02 Summary of Policy Context

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## 02.1 National and Regional Context

The planning policy context in Limerick has been rapidly evolving in recent years since the merging of Limerick City and County in 2014, with the publication of the National Planning Framework in 2018 and the release of The Regional Spatial and Economic Strategy (RSES) for the Southern Region, the draft Limerick Shannon Metropolitan Area Strategic Plan (MASP) and the Draft Limerick Shannon Metropolitan Area Transport Strategy (LSMATS). The NPF set the scene for a rapid expansion of the City's population over the coming two decades with a target of population growth of between 47,000 and 56,000. The NPF notes the need for ambition in the Limerick Metropolitan Area:

*“This requires growing and diversifying the City's employment base and attracting more people to live in the City, both within the City Centre and in new, accessible green-field development areas”.*

The RSES has further expanded on these growth objectives and outlines guiding principles in terms of strategic employment growth. MASP Objective 12 specifically refers to the sustainable development of specifically IDA initiatives such as the subject proposal in which it states that:

*“It is an objective to seek investment in the sustainable development of initiatives of IDA Ireland and Enterprise Ireland in strengthening enterprise assets, fostering competitive locations and conditions for enterprise growth in the Limerick Shannon Metropolitan Area”.*

A number of common themes have emerged among all policies namely:

- The need to ensure that there is a strong coordination between land use and transport planning, with significant job locations being located in proximity to public transport with provision for cycling and walking connectivity from existing residential areas.
- Ensuring that identified locations for strategic employment are infrastructure-led.
- That traditional models of delivering employment lands need to be revisited with an approach that is orientated towards placemaking and meeting the needs of the modern workforce.
- Areas for growth and smart specialization should be further explored, as well as the potential to partner with existing third level and healthcare institutions to achieve synergies.
- Encouraging the growth of clusters and co-location of Small and Medium size Enterprises (SMEs) with Multi National Corporations (MNCs) to enhance mutual benefits to both.

In its 2021 strategy 'Driving Recovery and Sustainable Growth 2021 – 2024', IDA Ireland sets out its plans to acquire additional strategic sites for future development in the Mid-West region, with an overall target of attracting 76 investments for the region.

The Shannon Estuary Economic Taskforce 2022 has identified, through extensive stakeholder consultations, eleven key actions for inclusion in its final report, including:

*'Partner with Local Authorities and State Agencies to identify any additional suitable sites, over and above what is already available, that may be required for the establishment of industries of significant scale that will be attracted to the region by the availability of affordable clean energy'.*

## 02.2 The Limerick City and County Development Plan – 2022 – 2028, (CDP)

The CDP acknowledges that the 'future growth, resilience and competitiveness' of Limerick's economy is dependent on a range of factors including indigenous enterprise and foreign direct investment. Of the five economic principles that form the cornerstone of the economic strategy for Limerick, the following two are of specific relevance to this submission:

- Clustering,
  - » *'a geographic or virtual concentration of interrelated companies, suppliers and associated institutions. Clusters put in place a favourable and connected regional business ecosystem in which new players emerge and support the development of new industrial value chains and emerging industries'.*
- Capacity Building
  - » *'building capacity to enable effective implementation and to respond to emerging challenges. Capacity building aims at developing a secure and stable economy that enables economic resilience by adapting to challenges and anticipating changes'.*

Section 5.5 of the CDP specifically considers the identification of sufficient zoned lands. It sets out that the employment strategy aims to:

*'provide for the expansion of employment through the designation of a range of highly accessible employment locations. The Employment Strategy of this Plan seeks to align strategic employment locations with public transport corridors, increasing the efficiency of land-use, reducing sprawl and minimising carbon footprints and seeks to retain and enhance the important role of employment in the Limerick Shannon Metropolitan Area (in Limerick) and the County's Town Centres'.*

Specific policies in relation to employment development include:

### Policy ECON P2 – Economic Development and Enterprise

*'It is a policy of the Council to work in partnership with Enterprise Ireland, IDA Ireland, adjoining Local Authorities, the Regional Assembly and all other relevant agencies to promote, facilitate and enable sustainable enterprise and economic development, in line with the policies and objectives as set out in national, regional and local strategies'.*

### Policy ECON P3 – Limerick Shannon Metropolitan Area Economy

*'It is a policy of the Council to promote the Limerick Shannon Metropolitan Area as a key location for economic development supporting the provision of increased employment through the expansion of the existing enterprise ecosystem in the region and the development of smart specialisation'.*

# 03 Key Planning Considerations

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## 03.1 Employment Growth Requirements

The section below sets out the general requirements of IDA Irelands client base in response to the following questions raised by the Council in relation to SEDO No. E5 and SEDO No. E6:

- *What are the priority actions to continue to attract enterprises in knowledge economy sectors to Limerick and support their expansion?*
- *What actions are needed to grow successful indigenous enterprises in the knowledge economy?*
- *What locations in the city and county should be prioritised for these industries*
- *Are there priority locations for such infrastructures – what actions and in which locations*
- *What are the priority actions in business infrastructure, transport and other infrastructures to continue to attract [FDI] investment to Limerick?*
- *Are there priority locations for such infrastructures – what actions and in which locations?*

The current IDA client organisations tend to be technology or Lifesciences based with relatively low levels of associated transport of goods. Most IDA client organisations develop mobility management plans with their employees and welcome the opportunity to encourage their staff to adopt sustainable travel modes. Site selection criteria focus on the availability of utilities such as electricity and water capacity, gas and broadband and transport infrastructure in terms of proximity to a Bus Connects high frequency route, park and ride facility, served by cycle and pedestrian infrastructure or benefitting from a rail link as indicated in the LSMATS to support a modal shift away from the increasingly car-based commuting pattern.

Proximity to other strategic employment locations is also of key importance ie Raheen Business Park, the National Technology Park, Ballysimon Industrial Estate or Annacotty Industrial Estate and accessibility to the University of Limerick (UL). This contributes towards the attractiveness of the site as a potential new growth area in an employment cluster, that can benefit from the associated synergies, knowledge diffusion and capacity building between the various elements.

In addition to physical infrastructure the scale of the available landholding is a key consideration. The requisite size of any new campus is a function of the scale of land required by the prospective FDI clients that IDA Ireland are targeting. In general, these are projects of scale requiring extensive land areas. Campus size of between 50 to 100 hectares is considered appropriate, capable of hosting a cluster of compatible large-scale industries of international scale in a low-density campus setting.

## 03.2 Existing and Proposed Employment Provision

### 03.2.1 EXISTING PROVISION

The RSES states in Table 3 that there is 71 hectares of capacity in the National Technological Park (NTP), 57.5 hectare of capacity in Raheen Business Park and c. 54.6 hectares of capacity in Ballysimon. This is re-iterated in Section 5.8.2 of the CDP:

*'Elsewhere, Raheen Business Park, the National Technology Park and the proposed Northside Business Campus are identified as Strategic Employment Locations under the MASP. These strategic locations offer the capacity to cater for investment that require greenfield or brownfield sites, access to an international airport and third level graduates.'*

A review of the remaining capacity in the National Technological Park (NTP), Raheen Business Park, Ballysimon and along Dock Road, indicates that there is limited capacity remaining to attract, host and sustain large scale industrial development investment at these locations. This is exacerbated by the recent substantial dezoning of land due to flood risk and attenuation concerns.

The residual lands are predominantly smaller, fragmented areas, frequently within flood zones and are unsuitable for large strategic development. In other cases the residual lands are not available for development, as is the case with Irish Water's planning permission for the development of a National Laboratory, phase 1 of a larger masterplan (planning ref 19/514). The lack of zoned capacity is underlined in the Castletroy Local Area Plan which noted in 2019 that 'it is highly likely that there will be a significant pressure in this area for large-scale employment and residential growth during the lifetime of the new plan'.

# 04 Conclusion

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IDA Ireland welcomes this opportunity to make a submission Stage 2 - Public Consultation of the High-level Goals of LECP for Limerick City and County. Our client and the Council are aligned in the goal to support the growth of employment and enterprise in the Limerick Metropolitan area. We concur with the Council's assessment that the future growth, resilience and competitiveness of Limerick's economy is dependent on, inter alia, indigenous enterprise and foreign direct investment.

IDA Ireland proposes to target 76 investments for the Mid-West region<sup>1</sup> in the period 2021 to 2024<sup>2</sup>. Access to suitable and cost-effective property solutions and a supportive business environment with associated infrastructure will be fundamental to the realisation of this. Ensuring the availability of appropriately zoned lands is key.

IDA Ireland's objectives align with the high-level goals of the LECP and in particular SEDO No. E5 and E6 in relation to the provision of appropriate employment zoning. Given IDA Ireland's extensive experience in this area, and with the view to achieving the ambitious NPF and RSES employment targets, IDA Ireland's would like to emphasise their willingness to work with the Council in responding to the LECP SEDO No. E5 and E6 questions raised in the Policy Framework relating to which locations should be prioritised for future enterprise development and what actions are required to continue to support the future development of these sectors.

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<sup>1</sup> Including Limerick, Tipperary and Clare

<sup>2</sup> IDA 2021 Strategy, "Driving Recovery and Sustainable Growth 2021-2024"