



Comhairle Cathrach
& Contae Luimnigh
**Limerick City
& County Council**

Pleanail, Comhshaoil agus Cruthú Áite
Comhairle Cathrach agus Contae Luimnigh
Luimneach

Planning, Environment and Place-Making
Limerick City and County Council
Limerick

An Bord Pleanála
64 Marlborough Street
Dublin 1
D01 V902

6th May 2025

Dear Sir/Madam,

AN BORD PLEANÁLA	
LDG-	080526-25
ABP-	
27 MAY 2025	
Fee: €	110
Type:	Chg
Time:	
By:	POST

SM

Planning permission was originally granted by LCCC (Ref: 24/384) on the 23rd January 2025 for the change of use within the current administration area from an open place office space to a production area. Please see link to the application and LCCC website below:

[ePlan - Online Planning Details](#)

The application was subsequently appealed to An Bord Pleanála (ABP-321828-25). A decision has yet to be made.

The following question was posed to LCCC, under application EC-077-25, under Section 5(1) of the Planning and Development Act 2000 (as amended):

'Whether an internal reconfiguration of floor space to accommodate a new item of plant which augments the current permitted manufacturing process at this location and does not involve external works other than minor fenestration revisions to an internal courtyard at Derryokane Avenue, Raheen Industrial Park, Limerick, V94 VH22 is or is not Development or is or is not Exempted Development'.

The question posed to LCCC consists of the same works that form part of the application currently appealed to An Bord Pleanála - ABP-321828-25.

Therefore, the Planning Authority of Limerick City and County Council (LCCC) respectfully requests that in accordance with Section 5(4) of the Planning and Development Act 2000 (as amended), that the following question, as to what is or is not development or is or is not exempted development, is referred to the Board:

'Whether an internal reconfiguration of floor space to accommodate a new item of plant which augments the current permitted manufacturing process at this location and does not involve external works other than minor fenestration revisions to an internal courtyard at Derryokane Avenue, Raheen Industrial Park, Limerick, V94 VH22 is or is not Development or is or is not Exempted Development'.

Please find details of the plans and particulars submitted by the applicant to LCCC under Section 5(1) of the Planning and Development Act 2000 (as amended) as well as the appropriate fee.

If you require any additional information in relation to this referral, please don't hesitate to contact me.

Yours sincerely,



Áine Leland
Executive Planner
Planning and Place-Making
Dooradoyle
Limerick



CHARTERED TOWN PLANNING CONSULTANCY

Millside, Mill Road, Corbally,
Limerick, Ireland V94 46X5
T: +353 61 341782
M: +353 86 6887402
E: info@akplanning.ie

Planning & Placemaking,
Limerick City & County Council,
Dooradoyle,
Limerick.

08-04-2025

RE: Section 5 Declaration Request

A Chara,

I act for Adhesive Research Ireland who are seeking a Section 5 Declaration. As per the completed Section 5 Declaration Form attached and as presented below,

Question:

Whether an internal reconfiguration of floor space to accommodate a new item of plant which augments the current permitted manufacturing process at this location and does not involve external works other than minor fenestration revisions to an internal courtyard is or is not development and if it is development whether it is exempt development.

We are seeking this declaration under the following section of the Planning and Development Regulations.

Section 4(1) The following shall be exempted developments for the purposes of this Act
- (h) development consisting of the use of the carrying out of works for the maintenance, improvement or other alteration of any structure, being works which affect only the interior of the structure or which do not materially affect the external appearance of the

structure so as to render the appearance inconsistent with the character of the structure or of neighbouring structures;

The following points are salient in this case;

- The works involved are internal with only some minor fenestration changes to a non-public realm facing elevation to an inner courtyard area.
- The works do not involve any drainage or water supply requirements.
- The original manufacturing process remains the same with the machine involved only introduced to cut the adhesive tape for the benefit of certain customers.
- There is no intensification of use involved in this proposal as the process will only require 2 or possibly 3 additional staff. In this regard it is important to understand that the facility currently employs 65 staff across 2 shifts but previously employed 90 staff in 2021 and 2022. The building, car parking, canteen, staff changing areas etc can accommodate up to 100 staff.
- Any changes or alteration to the plant internally will be the subject of a revisions to the existing FSC and DAC through normal Building Control processes.

There is a planning application 24/384 in train for this proposal and it is currently under appeal (ABP-321825-25). I was asked by the company to formulate a first party response to the appeal, but on examination of the application that was made I arrived at the conclusion that the application was not required in the first instance.

The company are in the unfortunate situation of having expended a large amount of money to purchase equipment and the delay that now results from a 3rd party planning appeal relating to surface water concerns in the wider area of Raheen Business Park threatens to impact this inward investment in the plants Limerick Operations.

I would trust that this Section 5 can consider this proposal exempt and that we can withdraw the planning application.

Yours Faithfully,



Adam Kearney BA MA MIPI MRTPI

Fee of 80.00 paid to the Local Authority: **Receipt No. 2078973**

Limerick City and County Council

Planning Department

Section 5 Application

DECLARATION ON DEVELOPMENT AND EXEMPTED DEVELOPMENT

Applicant's Name: Adhesive Research Ireland

Applicant's Address: Derryokane Avenue, Raheen Business Park,
Raheen, Co. Limerick

Telephone No. _____

Name of Agent (if any): Adam Kearney (AK Planning)

Address: Millside, Mill Road,
Corbally, Limerick, V94 46X5

Telephone No. 086 6887402

Address for Correspondence:

As per Agent

Location of Proposed development (Please include **EIRCODE**):

Derryokane Avenue, Raheen Business Park,

Raheen, Co. Limerick, V94 VH22

Description of Proposed development:

Whether an internal reconfiguration of floor space to accommodate a new item of plant which
augments the current permitted manufacturing process at this location and does not involve external
works other than minor fenestration revisions to an internal courtyard is or is not development and if

it is deemed development whether it is exempt development

Section of Exempted Development Regulations and/or section of the Act under which exemption is claimed: Section 4(1) The following shall be exempted developments for the purposes of this Act - (h) development consisting of the use of the carrying out of works for the maintenance, improvement or other alteration of any structure, being works which affect only the interior of the structure or which do not materially affect the external appearance of the structure so as to render the appearance inconsistent with the character of the structure or of neighbouring structures;

Is this a Protected Structure or within the curtilage of a Protected Structure.

YES ☒ NO

Applicant's interest in site: Owner

List of plans, drawings, etc. submitted with this application:

Cover Letter, Site Location Map, Site Layout Plan, Proposed Floor Plans,
Elevations (No Changes)

Have any previous extensions/structures been erected at this location ☒ YES ☐ NO

If Yes please provide floor areas of all existing structures:

10/297 - Conditional - Permission for revisions to existing planning permission reference
07 /2985 which is for a two-storey research & development support building.

The revised proposal is for the construction of a single storey research & development
building of similar footprint, including associated offices, canteen and ancillary facilities linked
to the existing building with car parking and all other associated site works.

Signature of Applicant (or Agent) *Adam Kearney* (Agent)

NOTES: Application must be accompanied by:

- (a) Fee of €80
- (b) Site location map
- (c) Site layout plan
- (d) Dimensioned plans and elevations of the structure and any existing structures.
- (e) Where the declaration is in respect of a farm building, a layout identifying the use of each existing building together with floor area of each building.

Application to be forwarded to:

**Planning Department,
Limerick City & County Council,
Dooradoyle,
Limerick,
V94 XF67**

**Enquiries:
Telephone: 061-556556
E-Mail: planning@limerick.ie**

COMHAIRLE CATHRACH & CONTAE LUIMNIGH
LIMERICK CITY & COUNTY COUNCIL

REMITTANCE ADVICE / FAISNÉIS ÍOCAÍOCHTA

AN BORD PLEANALA
64 Marlborough Street Dublin 1
Ireland

Cheque No. 72691
Supp ID / Uimh. Aitheantais 34113
Date / Dáta 22/05/2025
Page / Leathanach 1/1

Your Ref/ Bhur dTagairt	Inv Date/ Dáta Sonraisc	Our Ref/ Ár dTagairt	AMOUNT/ SUIM EUR	Payable Iníoctha EUR
Section 5 Application	07/05/2025	36469466	110.00	110.00
PAGE TOTAL / IOMLÁN AN LEATHANAIGH			EUR 110.00	110.00
GRAND TOTAL / MÓRIOMLÁN			EUR 110.00	110.00

WH = Withholding Tax CT = Subcontractors Tax RA = Non Resident Landlord
INT = Late Payment Interest, Rate = 8.25% CMP = Late Payment Compensation

Section 5 Application –
Whether or not the proposed development is a change of use, it is a change of use of the land which is the subject of the application and does not involve external works other than minor (internal) revisions to an internal courtyard is or is not development and if it is development whether it is exempt development or not.
at Derryokane Avenue, Rahen Business Park, Rahen,
Co. Limerick for Adhesive Research Ireland

APPLICANT:

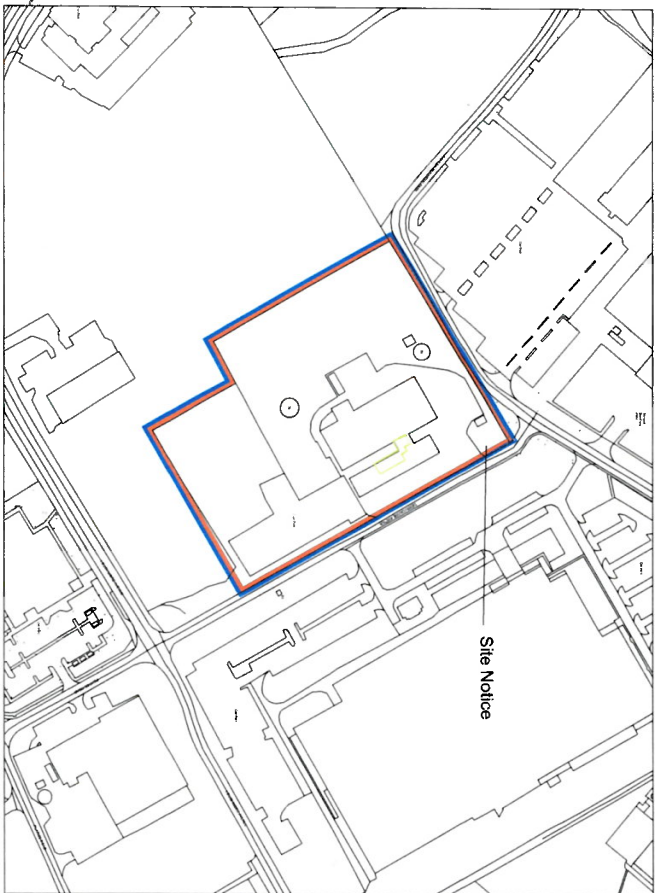
ADHESIVE RESEARCH IRELAND

DRAWING TITLE:

SITE LOCATION AND LAYOUT MAPS

COPYRIGHT LICENSE No. CYA50350131

© National Mapping Division of Toille Eireann



1. The site is located at the corner of Derryokane Avenue and Rahen Road, Rahen Business Park, Rahen, Co. Limerick. The site is bounded by Derryokane Avenue to the north, Rahen Road to the east, and an existing field to the south and west.

2. The site is currently occupied by an existing manufacturing building and an existing field. The existing manufacturing building is a single-story structure with a flat roof and is used for the production of adhesive products. The existing field is a grassy area used for storage and parking.

3. The proposed development consists of the construction of a new manufacturing building and the extension of the existing manufacturing building. The new building is a two-story structure with a pitched roof and is designed to accommodate the production of adhesive products. The extension of the existing building is a single-story structure with a flat roof and is designed to accommodate the storage of adhesive products.

4. The proposed development is a change of use of the land from its current use as a manufacturing site to a new use as a research and development site. This change of use is necessary in order to enable the applicant to carry out research and development work in the field of adhesive products.

5. The proposed development is exempt development under the provisions of the Planning and Development Act 2000. The applicant is therefore not required to obtain planning permission for the proposed development.

6. The applicant is aware of the provisions of the Planning and Development Act 2000 and the Planning and Development Regulations 2001 and is satisfied that the proposed development is exempt development.

7. The applicant is aware of the provisions of the Planning and Development Act 2000 and the Planning and Development Regulations 2001 and is satisfied that the proposed development is exempt development.

8. The applicant is aware of the provisions of the Planning and Development Act 2000 and the Planning and Development Regulations 2001 and is satisfied that the proposed development is exempt development.

9. The applicant is aware of the provisions of the Planning and Development Act 2000 and the Planning and Development Regulations 2001 and is satisfied that the proposed development is exempt development.

10. The applicant is aware of the provisions of the Planning and Development Act 2000 and the Planning and Development Regulations 2001 and is satisfied that the proposed development is exempt development.

Proposed Site Layout Map
Scale 1:500

Site
Land Holding
Area Subject To Section 5 Application

AN BORD PLEANÁLA

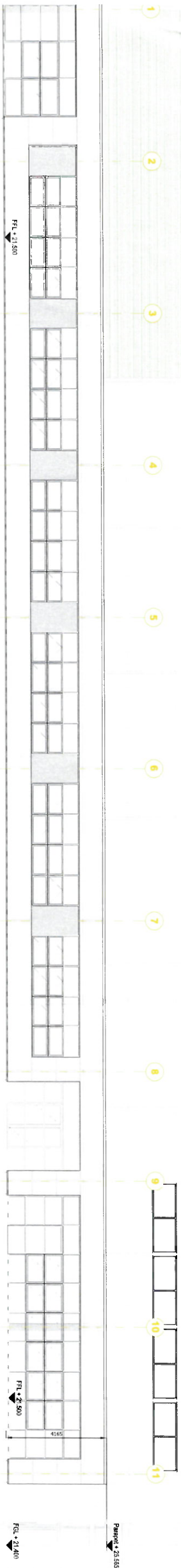
27 MAY 2025

LTR DATED FROM

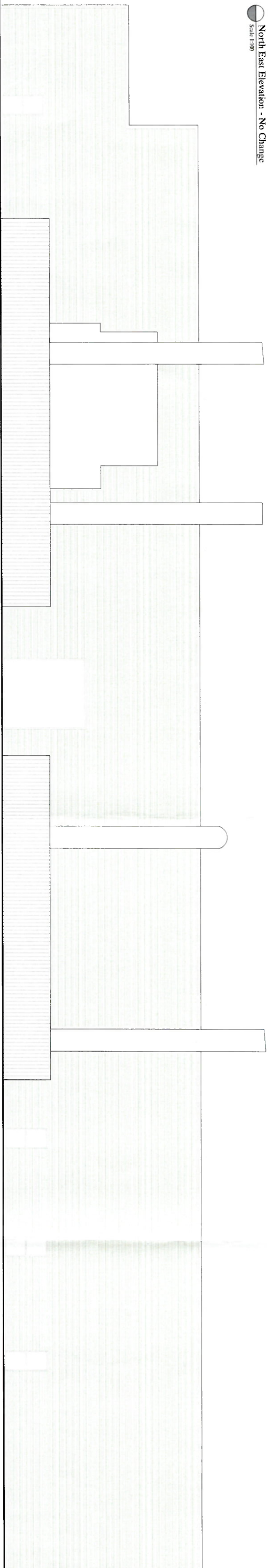
LDG- 322656-28

ABP- 322656-28

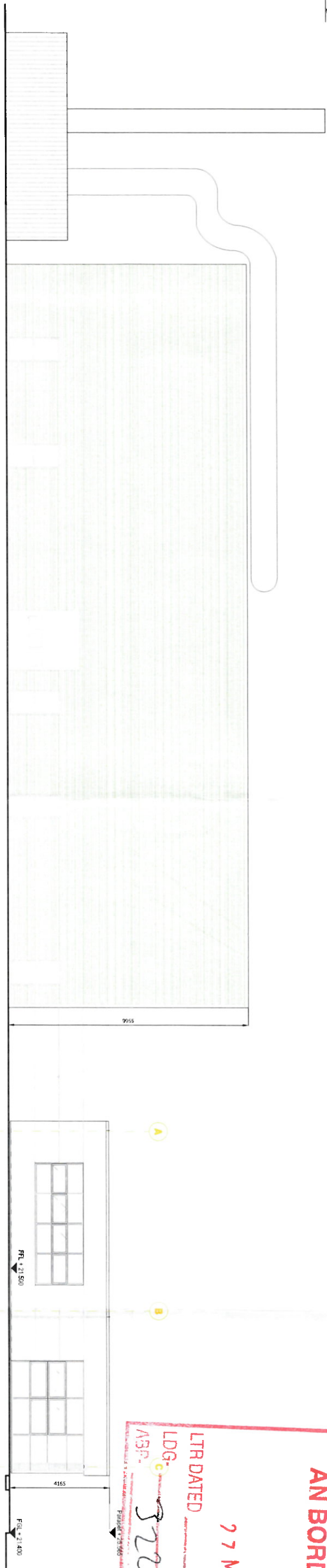
DERRYOKANE AVENUE



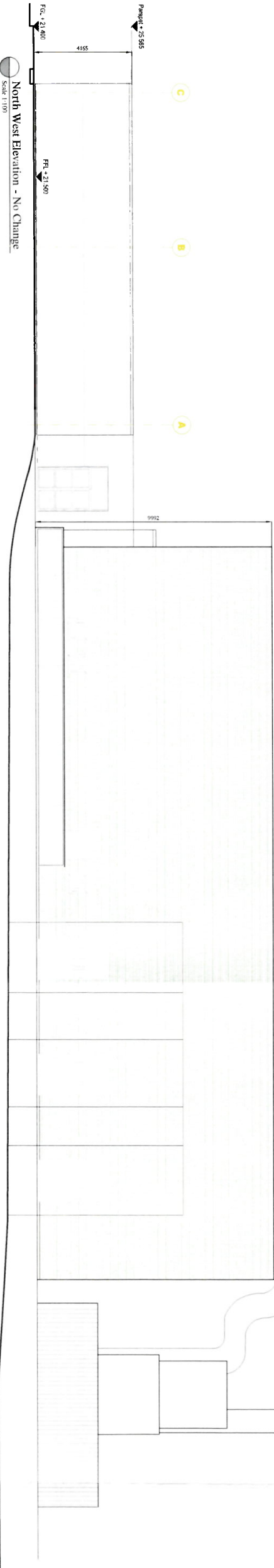
North East Elevation - No Change
Scale 1:100



South West Elevation - No Change
Scale 1:100



South East Elevation - No Change



North West Elevation - No Change

AN BORD PLEANÁLA

27 MAY 2025

LTR DATED

FROM

LDG-

435

Keywords

3265b. 2f.

Parapet + 25.60

DRAWINGS PREPARED BY:

Adam Kearney, AK Planning,
Millside, Mill Rd, Corbally, Li-

Millside, Mill Rd, Corbally, Limerick City.
Telephone: (061) 341782 / (086) 6887402

SCALE(S):	REVISION NO.:	DATE:
-----------	---------------	-------

SCALE(S): 1:100	REVISION NO.:	DATE: April 2025
--------------------	---------------	---------------------

PROJECT:

Section 5 Application -

Whether an internal reconfiguration of floor space to accommodate a new item of plant which augments the current permitted manufacturing process at this location and does not involve external works other than minor fence/stair revisions to an internal courtyard is or is not development and if it is development whether it is exempt development.

at Derrykane Avenue, Raheen Business Park, Raheen,
Co. Limerick for Adhesive Research Ireland

APPLICANT:

ADHESIVE RESEARCH IRELAND

DRAWING TITLE:

Key Plan Part A
Area Subject to Section 5 Application
60 min Fire resisting Construction
FD 30S
FD 60S

AN BORD PLEANÁLA

27 MAY 2025

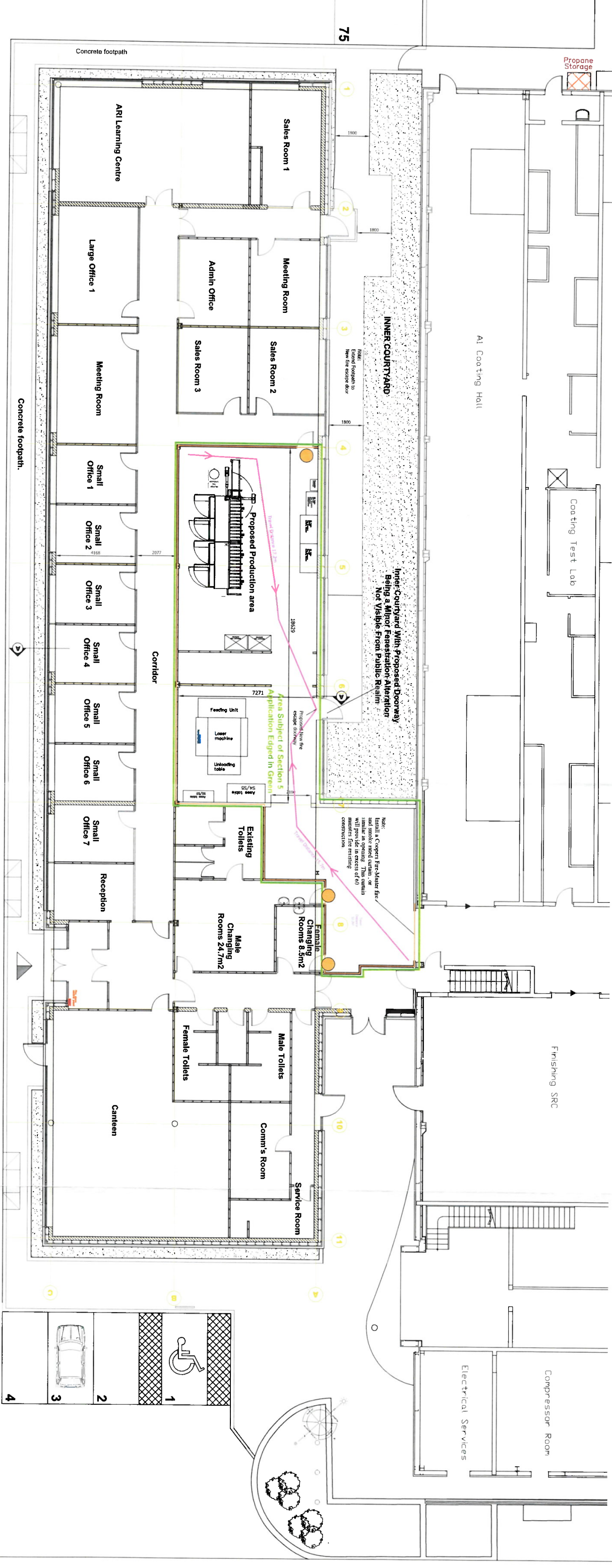
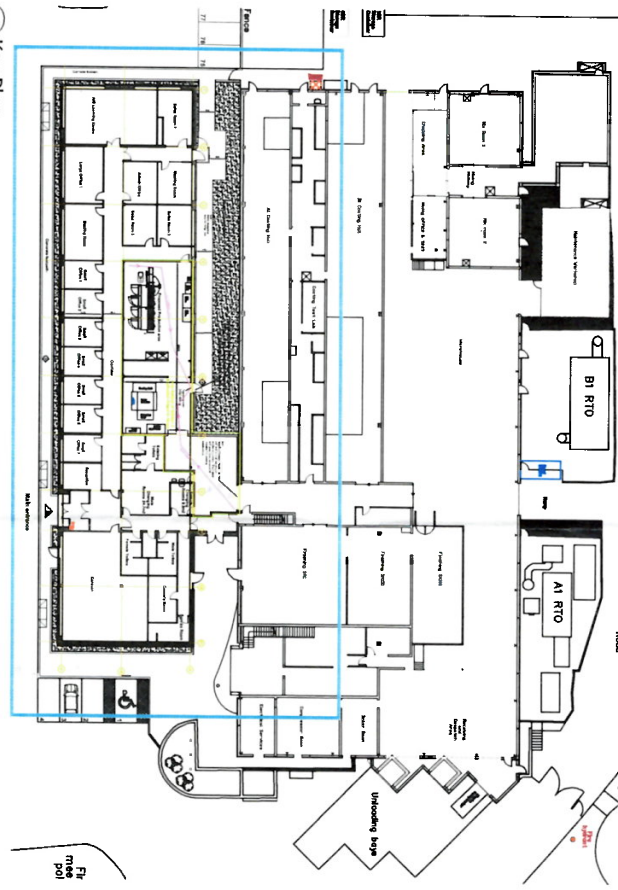
LTR DATED

FROM

LDG-

ABP- 32265625

Key Plan
Scale N.T.S.



Proposed Floor Plan Area Subject to Section 5 Application 188.58m²
Scale 1:100

