



Submission on the

draft Cork City Development Plan 2022-2028

Prepared in October, 2021 on behalf of



Coakley O'Neill Town Planning Ltd.

NSC Campus, Mahon, Cork

021 2307000

info@coakleyoneill.ie

www.coakleyoneill.ie

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1.0 Introduction

- 1.1 We, Coakley O'Neill Town Planning Ltd., NSC Campus, Mahon, Cork, on behalf of JCD Group, 1104, City Gate, Mahon, Cork, are instructed to prepare this submission on the draft Cork City Development Plan 2022-2028, hereafter referred to as the 'draft Plan'.
- 1.2 This submission is focused on strategic issues that must be addressed in the finalisation of the draft Plan if Cork City is to achieve its ambition as a national and regional economic driver.

2.0 JCD Group

- 2.1 JCD Group is one of Ireland's premier property developers, and has been one of the principal private investors in Cork City, having completed developments with a value in excess of €350 million over the past ten years alone.
- 2.2 Their portfolio of completed and current commercial schemes in Cork City, includes One Albert Quay, which is home to a global corporate HQ; The Capitol; 85 and 97 South Mall; and Penrose Dock in the City Centre; City Gate and City Gate Park, both constructed during the recession, in Mahon; and Gateway Business Park and Blarney Business Park in the north of the City.
- 2.3 Notwithstanding the current pandemic, JCD Group has also recently commenced construction of a new 46,000-square-foot office building at City Gate Plaza in Mahon, which will be let to Logitech, and has also secured permission for 201 no. Built To Rent units on Albert Quay, with a recent application for an office development submitted for the same site.
- 2.4 JCD Group also works collaboratively with government agencies including IDA Ireland to market Cork abroad and also sponsors Cork Chamber of Commerce in various initiative to attract Foreign Direct Investment, as well as supporting the City Centre initiatives promoted by the Cork Business Association.
- 2.5 In this context, JCD Group is acutely aware of office investor requirements in an increasingly competitive global market.
- 2.6 It is in this context that this strategic submission is made. It is focused on key issues of real concern that, if not actioned, will negatively impact the future growth and prosperity of the City over the lifetime of the Plan, and will not deliver compact growth and balanced regional development envisaged in national and regional planning policy.

3.0 Submission in Detail

Strengthening of the economic policies of the draft Plan

3.1 Sustainable development – which encompasses economic, social and environmental goals - is the key tenet of the National Planning Framework (NPF) 2018, the Regional Spatial and Economic Strategy for the Southern Region (RSES) 2020, and the Cork Metropolitan Area Strategic Plan (MASP) 2020, which collectively underpin the policy basis for the significant uplift in population and employment projected for Cork to 2040 as advocated by the draft Plan. Furthermore, in making a development plan, the Elected Members are required by legislation to ensure that it promotes the proper planning and sustainable development of Cork.

3.2 Much of the draft Plan is focused on the achievement of social and environmental goals. In applying the principles of sustainable development with respect to the economy of Cork, it is noted that:

- Chapter 1 (Introduction) of the draft Plan sets out a vision for the City to include a strong and diverse economy
- Sections 7.37 and 7.4 of Chapter 7 (Economy and Employment) note that there is a need to ensure that Cork City can compete for internationally mobile investment, and to promote local business growth
- Objective 7.2 commits Cork City Council to support economic growth and diversity to make Cork a global investment capital where businesses can flourish and expand as part of an agile and diverse employment network.

3.3 However, while the principles of sustainable development insofar as they apply to the economy are acknowledged throughout the draft Plan, in particular in Chapter 7, it is also the case that in the Core Strategy (Chapter 2 of the draft Plan) – the purpose of which is to set out the key overarching policies and objectives of the draft Plan to aid the preparation and assessment of prospective development proposals - there is limited reference to the importance of the economy and economic growth to the future prosperity and sustainability of the City.

3.4 Instead, the Core Strategy of the draft Plan is premised on future population growth and distribution, and related social and environmental objectives, without stating the importance of ensuring that this growth is actually delivered through economic growth in the local economy.

3.5 This is a significant omission from the Core Strategy of the draft Plan in the context of the objectives for a strong and diverse economy outlined in Chapters 1 and 7 of the draft Plan and such be considered a systemic shortcoming.

3.6 In addition, and unlike the current Cork City Development Plan 2015-2022 which includes reference to the specific Employment Targets in the Core Strategy, there are no such employment targets identified in either the Core Strategy or Chapter 7 of the draft Plan.

3.7 Furthermore, the Cork City Development Plan 2022-2028 will also function as a promotional document for Cork City in terms of attracting and retaining mobile investment and talent. The Cork brand is promoted internationally through sites such as www.wearecork.ie and www.growincork.com. If this brand is to be successful, the brand experience must mirror the brand promotion. It is submitted that the draft Plan does not reflect the brand aspirations conveyed by these websites and thus will impact negatively on Cork's competitiveness.

3.8 In this context, and in the interests of the overall economic, social and environmentally sustainable development of the City, the provisions of the draft Plan must be amended to incorporate a clear statement in the Core Strategy that confirms the economic aspects of development proposals are explicitly considered in the decision-making processes of the Council alongside the social and environmental aspects.

3.9 A new objective is required that specifically supports and encourages development proposals that strengthen Cork City's role as a national and regional economic driver, and that contributes to a strong, resilient, diverse and innovative economy for the City as envisaged in national and regional planning policy.

3.10 Accordingly, it is recommended that the following objective is added to Chapter 2 of the draft Plan:

Objective 2.37 Cork City Council shall support and encourage development proposals that strengthen Cork City's role as a national and regional economic driver, and that contribute to a strong, resilient, diverse and innovative economy for the City, as envisaged in national and regional planning policy.

3.11 For consistency and the avoidance of doubt, this same objective should also be carried forward to Economic, Employment and Retail Development section of Chapter 11 (Placemaking and Managing Development), as follows, to ensure a balanced assessment is made in the decision-making process:

Objective 11.14 Cork City Council shall support and encourage development proposals that strengthen Cork City's role as a national and regional economic driver, and that contribute to a strong, resilient, diverse and innovative economy for the City, as envisaged in national and regional planning policy.

3.12 Moreover, the Core Strategy of the draft Plan must be amended to include a specific section on the economy, including employment targets for all areas of the City, based on the projected 31,000 additional net jobs to 2028 set out in Chapter 7 of the draft Plan.

Interim car parking standards pending the delivery of CMATS

3.13 Aligned with the NPF, the draft Plan acknowledges that in order to grow and diversify Cork's employment base, the conditions to attract and retain talented innovators and entrepreneurs and to be accessible to investors need to be put in place.

3.14 However, despite the fact that the draft Plan seeks to position Cork as a globally competitive business location and acknowledges that the resultant significant increase in demand for travel needs to be managed carefully, the draft Plan proposes to significantly reduce office parking standards to as little as 1 space per 500m² in the City Centre.

3.15 According to sections 4.9 and 4.101 of the draft Plan, this dramatic step-change in modal shift is premised on the delivery of the €3.5 billion investment in transport infrastructure set out in CMATS.

3.16 However, Table 4.2 of the draft Plan clearly identifies that, save for the delivery of roads including the Dunkettle Interchange and the M28 to Ringaskiddy; the reservation of the Light Rail route alignment (although not yet identified); and an interim bus route during the lifetime of the draft Plan, i.e., to 2028, the substantial part of this €3.5 billion investment is not projected to come on stream until the medium to long term.

3.17 While JCD Group unequivocally supports measures to mitigate and adapt to the impacts of climate change, it is contended that such measures must move in step with public transport infrastructure that delivers equity in access to employment opportunities.

3.18 It is of significant concern therefore that, notwithstanding the fact that, for the most part, the key impactful public transport measures advocated by CMATS, and set out in Table 4.2 of the draft Plan, will not be delivered during the lifetime of the draft Plan, car parking standards for office developments in particular are proposed to be significantly reduced prior to the delivery of the very public transport measures on which this reduction is predicated.

3.19 This is particularly concerning given Table 7.1 of the draft Plan which estimates that approximately 31,000 jobs will need to be created in Cork City by 2028, and that the majority of these will be in office employment (17,980 (58%)).

3.20 The City Centre is the most sustainable location for employment, given its location at the centre of the public transport and sustainable travel modes network. The application of the significantly reduced car parking standards in the absence of the proposed public transport provision will only serve to undermine concerted efforts by investors such as JCD Group to achieve the objectives for compact growth and balanced regional development for Cork City as envisaged in national and regional planning policy, as the attractiveness of the city centre for this type of development will be severely reduced.

3.21 Included at Appendix 1 to this submission is a report compiled by Cushman Wakefield who are one of the largest global real estate companies with specific experience in relation to large FDI companies. Their report underpins the importance of adequate carparking provision for companies when considering a location to move to.

3.22 Their view is that the existing standards in the current Cork City Development Plan 2015-2022 would be the minimum expected by the majority of occupiers and any reduction in these numbers would certainly affect

Cork's ability to attract these occupiers going forward and put Cork at a competitive disadvantage when competing against other locations like Cork County or the Dublin Metropolitan Area.

- 3.23 In response to this key concern, JCD Group commissioned Atkins to prepare an assessment of the car parking standards for offices in Dublin compared to Cork. Attached at Appendix 2 to this submission is the detailed report prepared by Atkins which presents evidence of the over-restrictive nature of the proposed car parking standards for offices in Cork City, and, more importantly, the stark disparity and imbalance between the car parking level proposed in Cork City compared to those locations in the Dublin region which already have multiple public transport options available to them.
- 3.24 The car parking rates per m² in the Dublin Local Authorities, including Dublin City, is no greater than 1 space per 400m², compared to the 1 space per 500m² proposed for Cork City. The car parking rate in Dun Laoghaire, for example, which has an equivalent population to Cork City, but a more significant public transport system, including a light rail service and the DART, is double that of the rate proposed in the draft Plan for Cork City.
- 3.25 Even the car parking rate for offices in Cork County are significantly more generous, notwithstanding the available public transport options, including the commuter rail service to Midleton and Mallow. In fact, the potential level of car parking that could be provided is five times greater than that which could be provided in the suburbs (Zone 4) of the City.
- 3.26 Simply put, if the proposed reduced standards are implemented for Cork City Centre, then the potential for further investment in office development in the City Centre of the nature and scale envisaged in national and regional planning policy, and the draft Plan, will be seriously undermined. The proposed car parking standards will make development of office space in Cork less attractive and less likely to happen with negative outcomes for the sustainable development of Cork. Alternative locations which offer realistic car parking rates relative to the available public transport options will be favoured. The economic prosperity for the Cork region will be significantly imbalanced as a result, to the detriment of Cork City, in particular Cork City Centre.
- 3.27 There is also the very real potential that investment will be lost to the Cork region (and possibly to Ireland), as a consequence of these ill-conceived, unsubstantiated car parking standards. This will impact on the economic and social wellbeing of Cork. The lost revenues from these developments will both delay investment in environmental infrastructure and reduce the economic rationale for this public investment. As such, these provisions constitute a systemic shortcoming in the draft Plan.
- 3.28 The fact that there is a different car parking rate proposed in the draft Plan for the Cork Docklands area, in full knowledge of the lack of public transport infrastructure to serve that area of the City, only serves to highlight how wholly inappropriate and ill-judged the proposed car parking rates are. It is also noted that these parking rates have been determined by an Area Based Transport Assessment (ABTA), but that this is not available for review, which is a serious flaw.

3.29 The proposed car parking rates are also not aligned with national policy provisions, including the Climate Action Plan 2019, for increased EV spaces in urban areas by 2030.

3.30 In offering practical measures, such as the repurposing of car parks and a workplace parking levy, to assist in the transition to increased modal share as more significant public transport is in operation, the report of Atkins concludes that the car parking rates for offices in the current Cork City Development Plan 2015-2021 should be maintained.

3.31 Accordingly:

It is requested that the parking standards for office developments should remain as they are under the current Cork City Development Plan 2015-2021, and Cork City Council is requested to amend the draft Plan accordingly.

3.32 As no such car parking zone map is provided in the draft Plan, this submission also requests that:

The draft Plan is amended to include a detailed definitive map showing the respective car parking zones to eliminate any ambiguity as to which zone a particular location belongs.

4.0 CONCLUSION

4.1 In conclusion, this submission argues that, in the interests of the overall economic, social and environmentally sustainable development of the City, the provisions of the draft Plan must be amended to incorporate a clear objective in the Core Strategy that ensures that the economic aspects of development proposals are explicitly considered in the decision-making processes of the Council, alongside the social and environmental aspects.

4.2 Accordingly, it is recommended that the following objective is added to Chapter 2 of the draft Plan:

Objective 2.37 Cork City Council shall support and encourage development proposals that strengthen Cork City's role as a national and regional economic driver, and that contribute to a strong, resilient, diverse and innovative economy for the City, as envisaged in national and regional planning policy.

4.3 For consistency and the avoidance of doubt, this same objective should also be carried forward to Economic, Employment and Retail Development section of Chapter 11 (Placemaking and Managing Development), as follows, to ensure a balanced assessment is made in the decision-making process:

Objective 11.14 Cork City Council shall support and encourage development proposals that strengthen Cork City's role as a national and regional economic driver, and that contribute to a strong, resilient, diverse and innovative economy for the City, as envisaged in national and regional planning policy.

4.4 In addition, the Core Strategy of the draft Plan must be amended to include a specific section on the economy, including employment targets for all areas of the City, based on the projected 31,000 jobs to 2028 set out in Chapter 7 of the draft Plan.

4.5 This submission also presents compelling evidence that the proposed parking standards for office development in the City Centre in particular, as set out in the draft Plan, are overly restrictive and imbalanced when considered against the existing and likely availability of public transport in Cork over the lifetime of the draft Plan, and disproportionately restrictive when compared to the car parking rates for offices in either the County or in the Dublin Local Authorities.

4.6 We understand the logic behind the proposed standards but respectfully submit that, in the absence of the necessary public transport infrastructure which will not be delivered in the lifetime of the development plan, both the funding and leasing of new space will become an impossible task.

4.7 If implemented, would lead to an imbalance of access to employment, particularly detrimental to people with limited access to public transport. As a consequence, they will hinder the development of office spaces in the city, thereby undermining an important component in assisting Cork to meet its population and employments targets as set out in national and regional planning policy.

4.8 Accordingly,

It is requested that the parking standards for office developments should remain as they are under the current Cork City Development Plan 2015-2021, and Cork City Council is requested to amend the draft Plan accordingly.

4.9 Interim alternatives to overly restrictive parking standards are proposed, including the repurposing of car parks in the future and Workplace Parking Levies. These measures have been used elsewhere successfully to ensure that the car parks of today can be transitioned to alternative uses at a later point in time once public transport becomes available.

4.10 Finally, as no such car parking zone map is provided in the draft Plan, this submission also requests that:

The draft Plan is amended to include a detailed definitive map showing the respective car parking zones to eliminate any ambiguity as to which zone a particular location belongs.

4.11 JCD Group would be pleased to engage further with Cork City Council on the contents of this submission. Please refer all correspondence to Aiden O'Neill, Coakley O'Neill Town Planning Ltd, NSC Campus, Mahon, Cork.

APPENDICES

Appendix 1 Report of Cushman Wakefield

Appendix 2 Report of Atkins

Appendix 1 Report of Cushman Wakefield

CORK CITY COUNCIL

DRAFT DEVELOPMENT PLAN 2022 – 2028

SUBMISSION

1ST OCTOBER 2021



CUSHMAN & WAKEFIELD

Cushman & Wakefield are one of the largest Global Corporate Real Estate companies and a core element of our business is in the area of Global Occupier Services (GOS). In this sector, we are the leading Global Real Estate provider, acting for many of the largest FDI companies on all their Real Estate requirements.

By far the biggest real estate sector within GOS is the office sector and this is consistent within the Irish market where we have acted on the majority of large scale office deals over the last 5 years. Some of the companies we act for include Apple, Facebook, TikTok, LinkedIn, Qualcomm and Clearstream, all of which have been significant employers over this period.

We have included to the rear of this document a schedule of deals where we have been involved in, either for Occupier or Landlord since 2017 in Cork City. These include all the new office schemes in the City Centre during that time.

We have been provided with a report prepared by Atkins in respect of a submission on behalf of JCD to Cork City Council concerning the parking standards set out in CCC Draft Development Plan 2022 – 2028. We have reviewed this report in the context of our ongoing engagement in the Cork City Centre office market and the occupier requirements from a car parking perspective and the ability of the city to continue to attract quality multi-nationals going forward.

CONT'D.....

We are conscious of the changing needs for cities to provide more attractive and liveable areas going forward and certainly support this over the longer term. The transition has happened in some European cities already, however, where this is taking place, there are some critical differences between them and generally what is the case in Irish Cities. The provision of quality infrastructure, and public transport, coupled with the availability of city centre residential accommodation is something we are not able to offer perspective occupiers in the Irish Market, and certainly in Cork City Centre. Until we can provide these services, we must understand making fundamental decisions in other areas may be detrimental.

Cushman & Wakefield believe that a shift in the provision of the current car spaces under the existing plan to the proposals contained in the new Draft Development Plan would have devastating consequences for attracting new occupiers to Cork City and would place the city at a distinct disadvantage to other locations both in Ireland and overseas. The existing car parking provisions are already tight, however, we believe they provide good balance allowing access for some staff members while the majority of staff still come by alternative means.

It is also relevant to understand the changes being made in the design of new buildings, improving the sustainability and environmental impact they have compared to older stock. There is much greater provision of electric car charge points and developers have also implemented design changes that will allow change of use from carpark to other uses when change comes..

CONT'D.....

Cushman & Wakefield have acted for Johnson Controls (One Albert Quay), Apple (Horgan's Quay), Forcepoint (85 South Mall), Clearstream (One Navigation Square) and Qualcomm, Cloudera and Varonis (Penrose Dock) over the last 5 years. In each of these transactions the availability of some level of car parking was absolutely essential and if it was not available at the levels provided some would have ended up in either suburban schemes of different cities.

The Cushman & Wakefield GOS Research Department continue to monitor the global office markets and occupier requirements in tandem, in order to inform clients on developing economies and new perspective locations. Public Transport, access and infrastructure are key elements in decision making process. Where deficiencies exist in these areas, the provision of a certain level of car parking is absolutely essential and we do not see this changing in Cork during the timescale of the 2022 – 2028 Development Plan.

CORK CITY OFFICE MARKET

Cushman & Wakefield Research has been monitoring the Cork Office market for more than 20 years.

The market has developed and changed over that period from 1999, which saw the commencement of EastGate and the Airport Business Parks to 2010 when City Gate in Mahon became the prime location through to 2016 when we saw the first new office scheme in the City Centre – One Albert Quay.

Included to the rear of this report is the Cushman & Wakefield Marketbeat for Cork City. The office take-up for Cork for the last 20 years has just been over 300,000 sq ft per annum.

Since 2016, the market has changed significantly in so far as over 50% of the annual take-up has been in the city centre during that period.

This has been driven by the expansion of the Tech Sector in particular who have preferred city centre locations for their employees.

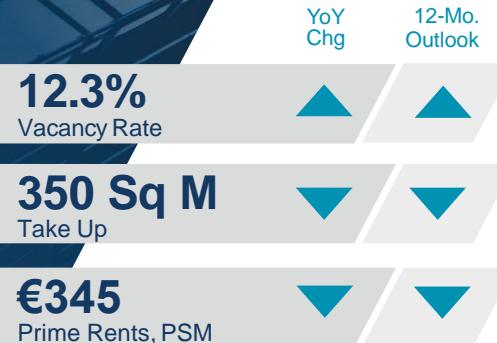
Although the car parking ratios in Mahon and the Business Parks were more generous, other factors also came into play such as additional amenities and services and better quality and more sustainable buildings.

The availability of car parking was still a critical component of the decision making process. We believe the existing standards in the current Development Plan would be the minimum expected by the majority of the occupiers during that period. Any reduction in these numbers would certainly affect Cork City's ability to attract these occupiers going forward.

For the continued development of the Cork City Centre Office market, we believe it is essential the current car parking standards are maintained at existing levels. Any reduction until we clearly see significant improvement in Public Transport and improved infrastructure will almost certainly result to a slow down in this market and could completely halt this sector.

CAR PARKING

Location	Occupier	Floor Area sq ft	Car Spaces	Ratio
One Albert Quay	Tyco Irl Limited (Johnson Controls)	88,372	69	1:1,200 sq ft
	PWC	19,106	10	1:1,910 sq ft
	ARUP	19,500	15	1:1,300 sq ft
	Investec	3,680	1	1:3,680 sq ft
	Ardmore	8,008	4	1:2,000 sq ft
	Malwarebytes	10,360	9	1:1,150 sq ft
	Hortonworks	12,499	1	1:12,499 sq ft
The Capitol	Alien Vault (AT&T)	10,339	20	1:516 sq ft
	Huawei Technologies	6,085	N/A	
	FaceBook	29,733	N/A	
85 South Mall	KPMG	28,824	15	1:1,920 sq ft
	Forcepoint	17,342	7	1:2,481 sq ft
Penrose One	Flexi Workspace	8,880	6	1:1,480 sq ft
	Flexi Workspace	11,241	9	1:1,249 sq ft
	IBEC	4,284	5	1:856 sq ft
	Cadence	12,528	9	1:392 sq ft
	Cadence	12,528	9	1:392 sq ft
	Matheson	8,057	6	1:1,342 sq ft
	Grant Thornton	11,996	10	1:1,200 sq ft
	Flexi Workspace	8,133	7	1:1,166 sq ft
Penrose Two	Aspira	1,820	1	1:1,820 sq ft
	Qualcomm	11,065	7	1:1,580 sq ft
	Qualcomm	18,618	13	1:1,423 sq ft
	Qualcomm	18,635	13	1:1,433 sq ft
	Cloudera	21,049	14	1:1,503 sq ft
	Varonis	19,988	13	1:1,537 sq ft
	Varonis	19,987	13	1:1,537 sq ft
One Navigation Square	Clearstream	78,072	78	1:1,000 sq ft
One Horgans Quay	Apple	36,000	20	1:1,800 sq ft
	Spaces	30,000	18	1:1,667 sq ft

**Occupier Activity**

Despite Covid-19 uncertainty, much awaited new space continues to uphold leasing activity in the Cork office market. Take up performed above the long run market average in 2020 reaching 32,000 sq m. However, the completion of new space at One & Two Penrose Dock, plays a pivotal role in this figure. 2021 has begun on a more muted note in terms of take up, not surprisingly. Take up totalled 350 sq m across two deals; 125 sq m at Gateway Business Park and a 215 sq m sublease at 14 South Mall. Outside of take up, three floors measuring a combined 3,400 sq m at Horgan's Quay was signed to a US tech occupier while just under 1,000 sq m was reserved in smaller lot sizes in the city centre and suburbs.

Availability & Development Activity

Availability rose in the opening three months of 2021 to 80,100 sq m. This represents a notable rise from Q1 2020, when availability stood at 54,685 sq m. The rise over the twelve-month period is reflective of new space being delivered to the market which is yet to be occupied, such as 15,300 sq m at Penrose Dock and Horgan's Quay. It is also a result of market churn and some sub-let space. Sub-let space accounts for 6.4% of availability at present. At the end of March, the vacancy rate sat at 12.3% compared to a median of just under 14% over the past 15-year period.

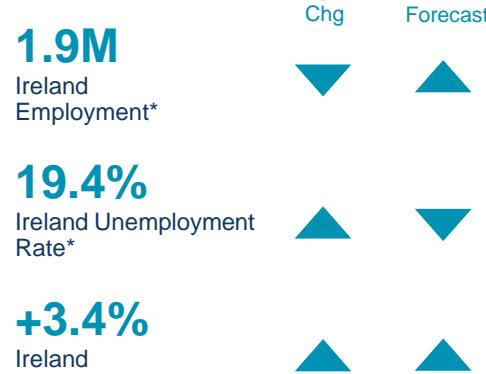
From a development side, lockdown saw no new stock added in quarter one. 2020 recorded 32,650 sq m of new stock added to the market at the aforementioned Penrose Dock and Horgan's Quay. Space remains under construction in the city centre at The Counting House, where 6,050 sq m is due to complete in mid 2021, however this timeline is dependent on restrictions easing.

Outlook & Market Commentary

Looking forward, the Cork office market is not immune to the questions surrounding the large-scale work from home experiment which continues to take place. However, a significant number of large requirements by expanding occupiers provides a solid pipeline for potential leasing activity.

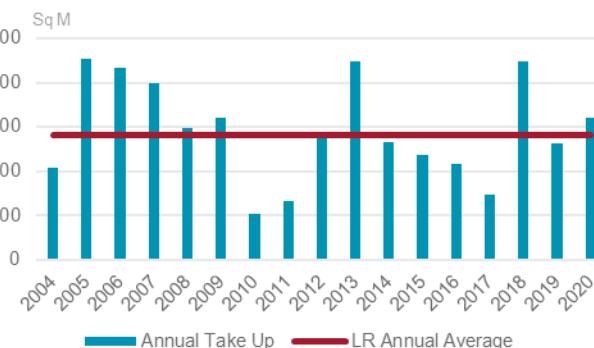
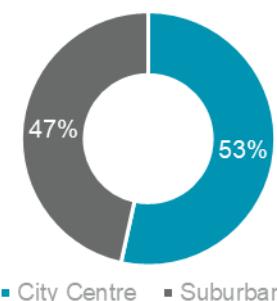
“The recent Government announcement around a gradual relaxation of COVID-19 restrictions, including residential construction with commercial construction likely to follow shortly thereafter and with the ever-improving vaccine roll-out we can look forward with some optimism to an end to the pandemic and the associated restrictions. Lockdown 3 has enforced the importance of the physical office as employees look forward once again to person-to-person collaboration and interaction in an office environment after months of remote working.”

Séan Healy, Director & Head of Offices, Cushman & Wakefield Cork

ECONOMIC INDICATORS
Q4 2020

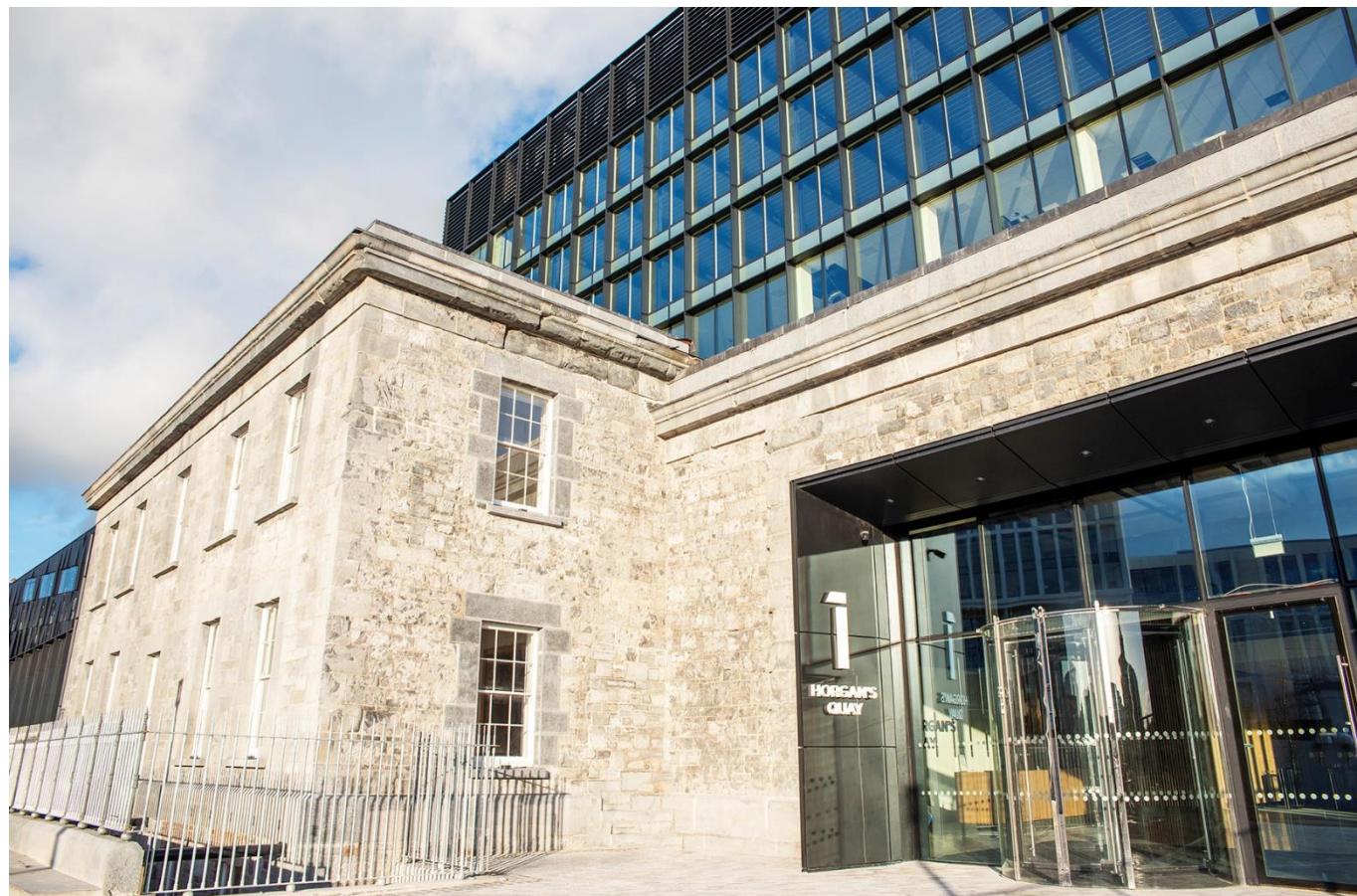
Source: CSO

*COVID-19 Adjusted Measure

Take Up (Sq M), 2020**Availability (Sq M) and Vacancy Rate (%)****Availability by Region (Sq M)**

CORK MARKET

Office Q1 2021



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KATE ENGLISH

Chief Economist, Head of Research & Insights Ireland,
Tel: +353 (0) 1 639 9206
Kate.English@cushwake.com

KATIE O' NIELL

Economist, Research & Insights Ireland
Tel: +353 (0) 1 639 9200
Katie.oneill@cushwake.com

PETER O'FLYNN

Managing Director, Cork
Tel: +353 (0) 21 464 8502
peter.oflynn@cushwake.ie

SEAN HEALY

Director, Head of Offices, Cork
Tel: +353 (0) 21 464 8503
sean.healy@cushwake.ie

SIOBHAN YOUNG

Senior Surveyor, Cork
Tel: +353 (0) 21 464 8524
siobhan.young@cushwake.ie

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Peter O'Flynn

Managing Director
Cork

Direct: +353 21 427 5454

Mobile: +353 86 250 7944

Email: peter.oflynn@cushwake.ie



Appendix 2 Report of Atkins

JCD Submission

Cork City Draft Development Plan 2022-2028 Car
Parking Standard Submission

JCD

September 2021

Notice

This document and its contents have been prepared and are intended solely as information for JCD and use in relation to its submission to Cork City Council in relation to the Cork City Draft Development Plan 2022-2028

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1. Introduction

Atkins have been engaged by JCD to prepare a submission to Cork City Council (CCC) in relation to the parking standards set out in the CCC Draft Development Plan 2022-2028. The focus of this submission relates specifically to the new car parking standards set out for office spaces in all areas of the city. The standards are set out Chapter 11, Table 11.13 of the Draft Development Plan. The office car parking standards are shown below in Table 1-1.

Table 1-1 - Office Parking Standards under the Cork City Draft Development Plan

Draft Development Plan Car Parking Standards (Spaces per GFA)				
Land Use	Zone 1 (City Centre & Inner City)	Zone 2 (Ballincollig, City Suburbs and areas accessible to mass transit (existing or proposed LRT, Core Bus Network))	Zone 3 (Blarney, Glanmire, Tower, Rochestown)	Zone 4 (Hinterland and Hinterland Villages)
Offices Enterprise & Employment	1 per 500	1 per 300	1 per 200	1 per 100

JCD is a commercial property development and leasing company headquartered in Cork. As one of the leading developers in Ireland, JCD has a reputation for delivering high quality, commercial, retail and office space in Cork and around the country. There are currently 5,000 employees working in JCD developments. Some key developments in Cork delivered by JCD are listed below:

- One Albert Quay is situated in Cork city centre and is comprised of over 170,000 sq ft of office and retail space. It contains the global headquarters of Tyco and boasts a number of other multinational tenants.
- City Gate is Corks' largest office development comprising of over 360,000 sq ft of office and health care space. Delivered during the height of the recession, this development is home to several large multinational companies as well as the Mater Private Cork.
- Penrose Dock contains over 250,000 sq ft of office space and provides of offices for multinational tenants such as Grant Thornton, and Qualcomm.
- 85 South Mall provides 46,500 sq ft of office space in the city centre.

JCD have a proven track record of investing in and delivering for Cork city as evidenced in the examples above. The central concern to JCD is that the proposed parking standards for the city, set out in the Cork City Draft Development Plan, would be overly restrictive and, if implemented, would lead to an imbalance of access to employment, particularly detrimental to people with limited access to public transport. As a consequence, they will hinder the development of office spaces in the city which will be an important component in assisting Cork to meet its population and employment targets as set out in Project Ireland 2040.

This submission provides the evidence to support this assertion by JCD. It demonstrates that the proposed parking standards are excessively restrictive and imbalanced when considered against the existing and likely availability of public transport in Cork over the lifetime of the Draft City Development Plan, i.e., to 2028 and *vis-à-vis* other urban councils' car parking standards. Thus, they will make development of office space in Cork less attractive and less likely to happen with negative outcomes for the sustainable development of Cork.

It is the opinion of JCD and as evidenced in this submission, that the parking standards for office developments should remain as they are under the existing development plan and Cork County Council is requested to amend the Draft Cork city Development Plan accordingly.

This submission is set out under the following headings:

- Impact of Existing and Proposed Parking Standards;
- Comparable Parking Standards in Dublin and Cork county;
- Existing Public Transport and Timing of Future Public Transport Provision in Cork;
- Transition to Electric Vehicles

- Implications of the Proposed Car Parking Standards;
- Interim Practical Measures; and
- Conclusion.

2. Impact of Existing and Proposed Parking Standards

2.1. Comparison with Existing Development Plan

The proposed parking standards in the Draft Development Plan generally represent a significant reduction in parking space provision for office developments when compared, not only with the standards set out under the current development plan, but also with development plans from other urban local authorities such as Dublin City Council and Dún Laoghaire Rathdown County Council (DLRCC).

The existing Cork City Development Plan divides the city into four zones for the purpose of applying specific standards to each zone. The Draft Development Plan also divides the city into four zones. While the zones aren't identical and it is noted that the Cork City boundary has expanded since the current development plan became operational, it is considered that the zones in each development plan are broadly comparable. Table 2-1 presents the parking standards set out in the Current and Draft Development Plan under the various zones. It should be noted that while the Draft Development Plan gives descriptive indications of what areas each zone will incorporate; a definitive parking zone map should be provided to eliminate any ambiguity about what locations each zone incorporates.

JCD requests that the Draft Development Plan be amended to include a detailed definitive map showing the respective car parking zones to eliminate any ambiguity as to which zone a particular location belongs.

Table 2-1 – Comparison Between Existing Car Parking Standards and Proposed Car Parking Standards

Existing Development Plan Car Parking Standards (Spaces per sqm GFA)				
Land Use	Zone 1 (City Centre)	Zone 2A (Within 500m of Blackpool Station and Kent Station)	Zone 2B (South Docks Outside Zone 2A)	Zone 3 (Rest of Cork City)
Offices Enterprise & Employment	1 per 200	1 per 150	1 per 100	1 per 50

Draft Development Plan Car Parking Standards (Spaces per sqm GFA)				
Land Use	Zone 1 (City Centre & Inner City)	Zone 2 (Ballincollig, City Suburbs and areas accessible to mass transit (existing or proposed LRT, Core Bus Network))	Zone 3 (Blarney, Glanmire, Tower, Rochestown)	Zone 4 (Hinterland and Hinterland Villages)
Offices Enterprise & Employment	1 per 500	1 per 300	1 per 200	1 per 100

The proposed parking standards for Cork City will reduce the quantum of parking for office developments by at least 50% in all zones of the city, and in the case of Zone 1 by 60%. To illustrate this, a practical example is considered.

A development comprising of 3000 sqm GFA of office space is subjected to the parking standards set out above in Table 2-1. Figure 2-1 presents the maximum number of car parking spaces permitted in each zone for 3000sqm GFA of office space under the Current Development Plan and Draft Development Plan. An estimate of the number of employees for a development of this size was based on a ratio of 1 person per 16 sqm GFA, as assumed in section 10.96 of the Draft Development Plan.

However, it is noted that the Employment Density Guide 3rd edition¹ states that the employment density can be assumed to be 1 employee per 12 sqm of Net Internal Area (NIA) where the NIA is assumed to 85% of the GFA. This assumption would yield a greater number of employees, and potentially trips on the network.

¹ https://www.kirklees.gov.uk/beta/planning-policy/pdf/examination/national-evidence/NE48_employment_density_guide_3rd_edition.pdf

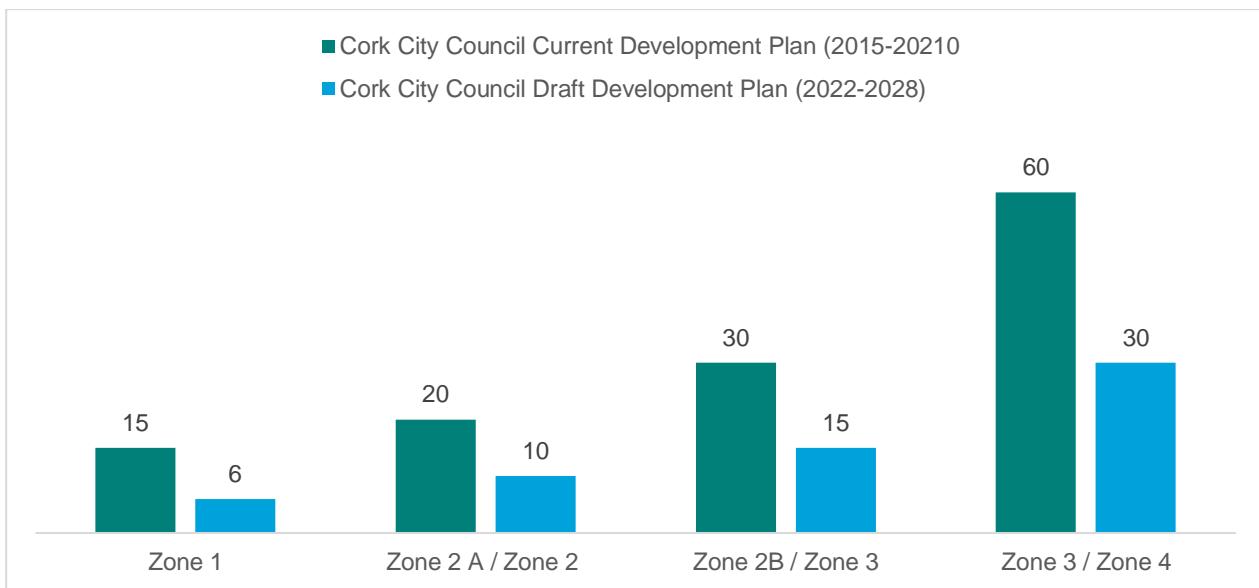


Figure 2-1 - Parking Spaces permitted for a development comprising of 3000sqm GFA of office space

To take Zone 1 as an example, a 3000sqm GFA office development in the city centre is permitted a maximum of 15 car parking spaces under the current development plan. Under the Draft Development Plan this would be reduced to just 6 car parking spaces. Based on a ratio of 1 employee per 16 sqm of GFA, a development of 3000 sqm GFA office is estimated to have 188 employees. The ratio of car parking spaces to employees under the Current Development Plan is 1 space per 12 employees. Under the Draft Development Plan this would reduce to just 1 parking space per 31 employees.

2.2. Comparison with Cork county

The Cork County Development Plan parking standards are presented in Table 2-2. Cork County Council have also published a Draft Development Plan. The proposed parking standards in this draft state a maximum level of parking for office spaces of 1 space per 17sqm GFA. Using the example discussed above, the permitted parking spaces under the Draft City and Draft County Development Plans are presented in Figure 2-2.

Table 2-2 - Cork city Development Plan vs Cork County Development Plan

	Cork City Zone 1	Cork City Zone 2 A / Zone 2	Cork City Zone 2B / Zone 3	Cork City Zone 3 / Zone 4	Cork County
Current Development Plans	1 per 200sqm GFA	1 per 150sqm GFA	1 per 100 sqm GFA	1 per 50sqm GFA	1 per 25sqm GFA
Draft Development Plans	1 per 500sqm GFA	1 per 300sqm GFA	1 per 200sqm GFA	1 per 100sqm GFA	1 per 17sqm GFA

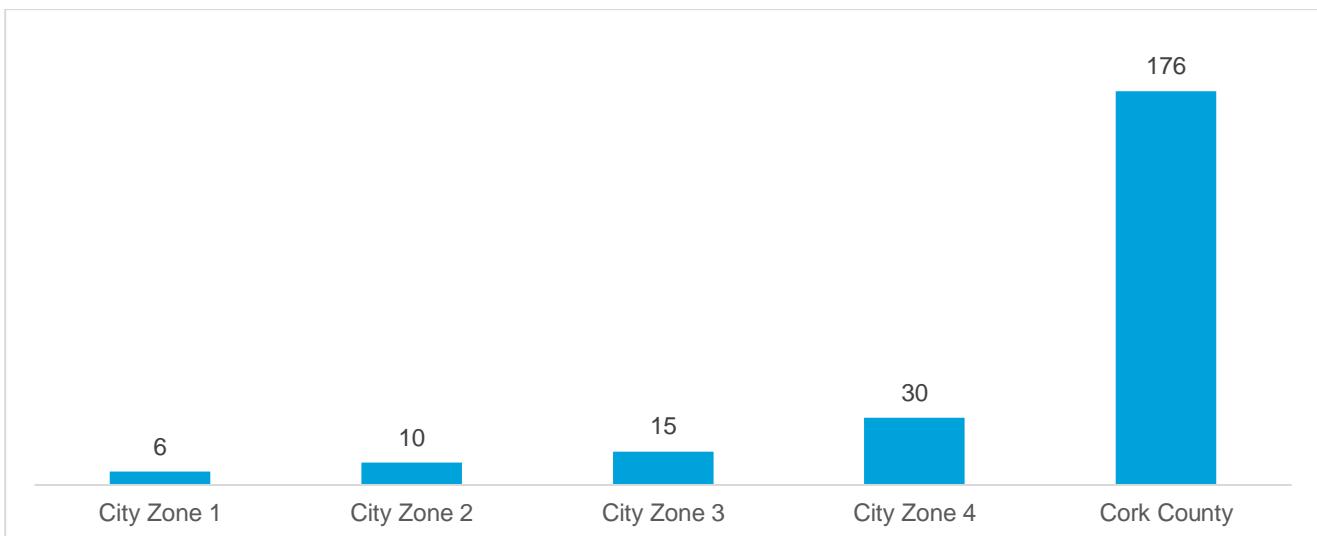


Figure 2-2 – Maximum Permitted Parking for 3000sqm GFA of Office Space Under Cork City and Cork County Development Plans

Under the Draft Development Plans, office developments constructed in the county will be serviced with five times more parking than office developments constructed in Zone 4 of the city. The difference in standards between the County and City Development Plan will likely result in office developments locating outside the city where parking standards are significantly more attractive.

- Cork City has been identified as one of the fastest growing regions in Ireland. It is expected that the population will increase by 50% to 60% by 2040. The associated economic benefits will be experienced by other areas if the office developments are located outside the city.
- If new office developments are increasingly located outside the city, single occupancy trips on the road network will increase as the outskirts of the city are not well served by public transport.

2.3. Docklands Parking Standards

It is noted that the Draft Development Plan has designated different parking standards for the Docklands. The standards for the Docklands are given below in Table 2-3.

Table 2-3 - Extract from Table 10.5 of the Draft Development Plan: Maximum Car Parking Standards for the Docklands

Parking Zones	Destination Parking
	1 Space per
North Docks	20 Employees (5% provision)
South Dock City Transition	20 Employees (5% provision)
South Docks Central	7 Employees (14.3% provision)
South Docks East	6 Employees (16.66% parking)

The Docklands are designated to be well served by public transport links in the future as set out in CMATS. The Light Rail Network and Bus Connects will intersect with these areas yet the parking provision for employees is generally less restrictive than the rest of the city. It is noted that the South Docks East is served by the same standard as the least restrictive standards set out for suburban areas (Zone 4), at the outskirts of the city where connectivity to public transport links will be limited.

It is noted that section 10.91 states the following:

“Cork County Council will seek to engage with applicants for major development proposals to identify solutions for car parking provision where the public transport infrastructure and services envisaged for Docklands has not yet been provided, subject to the overall long-term achievement of the maximum capacity targets set out in the Draft ABTA.”

This recognises the fact that public transport links are not yet adequate to support the full potential of the Docklands. It is our opinion that this strategy should be taken for the entire city.

The variation is at odds with car parking standards set out for the rest of the city, will result in uncertainty and ambiguity for development. Notwithstanding this we consider that the specific docklands car parking standards remain overly restrictive when compared to other car parking standards as set out in more detail in Section 3.

JCD requests that the parking standards in the Draft Development Plan be amended so that parking standards for the docklands are consistent with the rest of the city and that they remain as they are under the current development plan.

3. Comparable Parking Standards in Dublin and Cork County

Comparing the Draft Development Plan car parking standards against other car parking standards as set out in various development plans in Dublin is equally stark, highlighting the degree to which the proposed standards are at variance to other standards in areas with existing and proposed better access to public transport than Cork City and its suburbs. Table 3-1 compares the most restrictive parking standards for office developments in various development plans. The standards generally represent locations such as city centres and areas well served by public transport. The 3000 sqm GFA of office development example from Section 2 is included for context.

Table 3-1 - Comparison between various developments plans most restrictive office space parking standards.

Development Plan	Most Restrictive Office Space Parking Standards	Parking spaces permitted for an Office Space of 3000 sqm GFA	Employee per sqm GFA	No. of Employees	Parking Space to employee Ratio
Cork County Council Draft Development Plan (2022-2028)	1 per 17	176	1 per 16	188	0.94
Cork County Council Current Development Plan (2014-2021)	1 per 25	120	1 per 16	188	0.64
Fingal County Council Current Development Plan (2017-2023)	1 per 60	50	1 per 16	188	0.27
SDCC Current Development Plan (2016-2022)	1 per 75	40	1 per 16	188	0.21
SDCC Draft Development Plan (2022-2028)	1 per 75	40	1 per 16	188	0.21
DLRCC Current Development Plan (2016-2022)	1 per 100	30	1 per 16	188	0.16
DLRCC Draft Development Plan (2022-2028)	1 per 200	15	1 per 16	188	0.08
Cork City Council Current Development Plan (2015-2021) (City Centre)	1 per 200	15	1 per 16	188	0.08
DCC Current Development Plan (2016-2022) (City Centre)	1 per 400	8	1 per 16	188	0.04
Cork City Council Draft Development Plan 2022-2028 (City Centre)	1 per 500	6	1 per 16	188	0.032

As shown in Table 3-1, the proposed Cork City Zone 1 parking standards are more restrictive than the Dublin City Council's most restrictive standards for Dublin City Centre, a location with significantly better public transport links than Cork City.

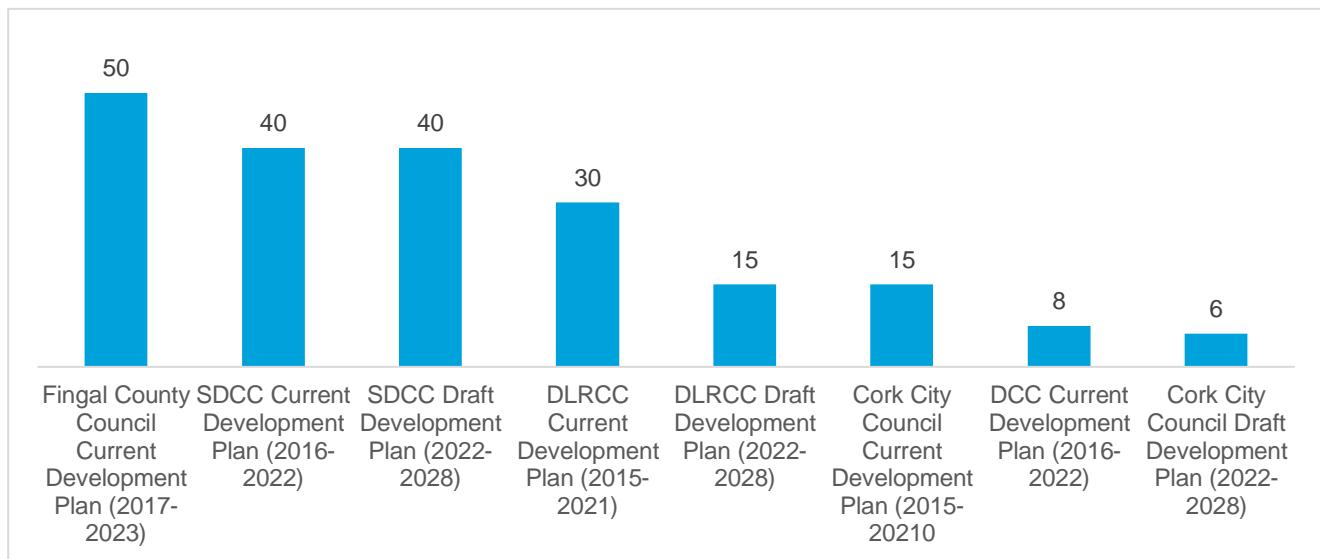


Figure 3-1 - Maximum permitted car parking spaces under various development plans for 3000sqm GFA of office space

The county of Dún Laoghaire Rathdown (DLR) is examined as an example due to its similarities to Cork as set out below.

Dún Laoghaire Rathdown has a population of 218,000 people according to the 2016 census data. According to the Cork city Draft Development Plan, the population of Cork City was 210,853 in 2016. The DLR Draft Development Plan parking standards divide the county into zones similar to the Cork City parking standards. Zone 1 covers town centres, zone 2 covers areas near public transport, zone 3 covers the rest of the urban area and zone 4 covers the rural areas of Dún Laoghaire Rathdown. These zones are similarly defined in the Cork City Draft Development Plan and are compared in Table 3-2.

Table 3-2 - Cork City Draft Development Plan 2022-2028 Parking Standards vs Dún Laoghaire Rathdown Draft Development Plan 2022-2028 Parking Standards (Office Developments)

Cork City Draft Development Plan	DLRCC Draft Development Plan
Zone 1 (City Centre & Inner City)	Zone 1 (Town Centres)
1 per 500sqm GFA	1 per 200sqm GFA
Zone 2 (Ballincollig, City suburbs etc)	Zone 2 (Near Public Transport)
1 per 300sqm GFA	1 per 150sqm GFA
Zone 3 (Blarney, Glanmire, Tower Rochestown)	3 (Rest of County (Non-Rural))
1 per 200sqm GFA	1 per 100sqm GFA
Zone 4 (Hinterland and Hinterland Villages)	Zone 4 (Rest of County (Rural))
1 per 100sqm GFA	NA

When comparing like for like zones in each county, the proposed parking standards under the Cork City Draft Development Plan will provide half the number of car parking spaces for an identical office development.

The purpose of this comparison is to demonstrate the restrictive nature of the proposed parking standards when contrasted with an urban area of a similar size. When viewed in the context of the quality of Public Transport available in both counties, the parking standards set out in the Cork City Draft Development Plan appear inordinately restrictive.

Dún Laoghaire Rathdown is served by a wide range of high-quality public transport. The area is served substantially by the green line LUAS and the DART. It is also served by a regional train service. As part of the Greater Dublin Area, Dún Laoghaire Rathdown is served by Dublin Bus and will benefit from the roll out of Bus Connects and the Greater Dublin Area Cycle Network.

Currently Cork City is served by a small number of high frequency bus routes operated by Bus Eireann and a Limited regional train service.

Table 3-3 - Comparison between Public Transport in Dún Laoghaire and Cork City

	Cork City	Dún Laoghaire Rathdown
Regional Bus Services	✓	✓
Dedicated Urban Bus Service		✓
Regional Train Services	✓	✓
Tram Service		✓
Commuter Rail Service (DART)		✓

A mode share analysis indicates lower use of private vehicles in Dún Laoghaire than in Cork City as shown in Figure 3-2 and Figure 3-3.

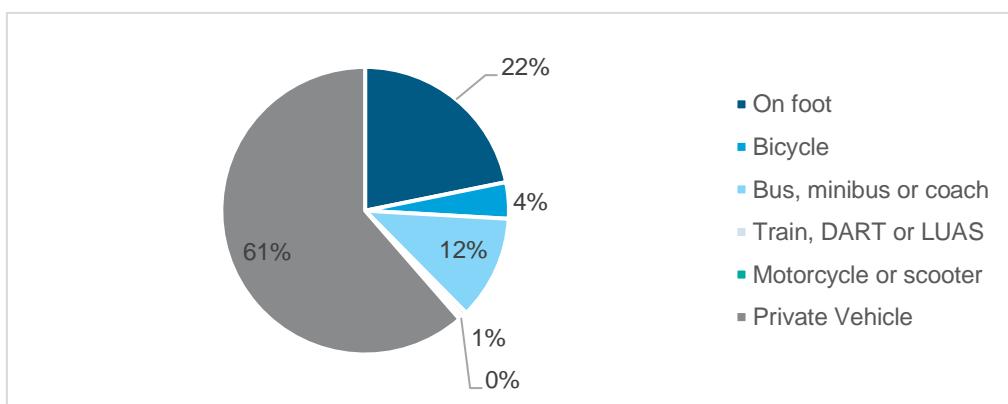


Figure 3-2 - Cork City Mode Share 2016²

² Based on 2016 data for Cork city. The city boundaries have since altered to include some suburban areas. However, the 2016 data provides an indication of mode share and the inclusion of the new areas would likely increase the private car mode share

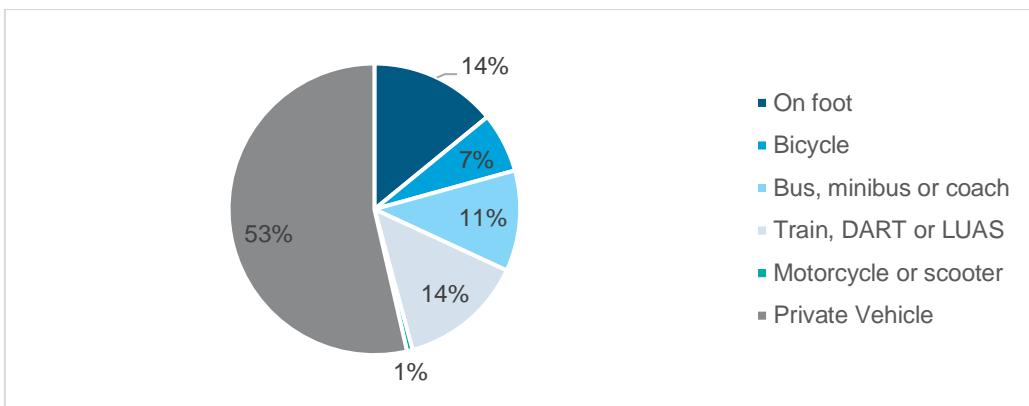


Figure 3-3 - Dún Laoghaire Rathdown Mode Share 2016

It is considered that the greater levels of Public Transport provision and lower dependence on the private car in Dún Laoghaire indicate that the level of car parking required in Dún Laoghaire is lower than Cork City. Despite this, the Dún Laoghaire Draft Development Plan has less restrictive parking standards than the Cork City Draft Development Plan.

4. Existing Public Transport and Timing of Future Public Transport Infrastructure

4.1. Existing Public Transport Infrastructure

As stated in the previous section, Cork City is currently served by a small number of high frequency bus services³ and a limited regional train service as shown in Figure 4-1 and Figure 4-2 taken from the Cork Metro Area Transport Strategy (CMATS)⁴.

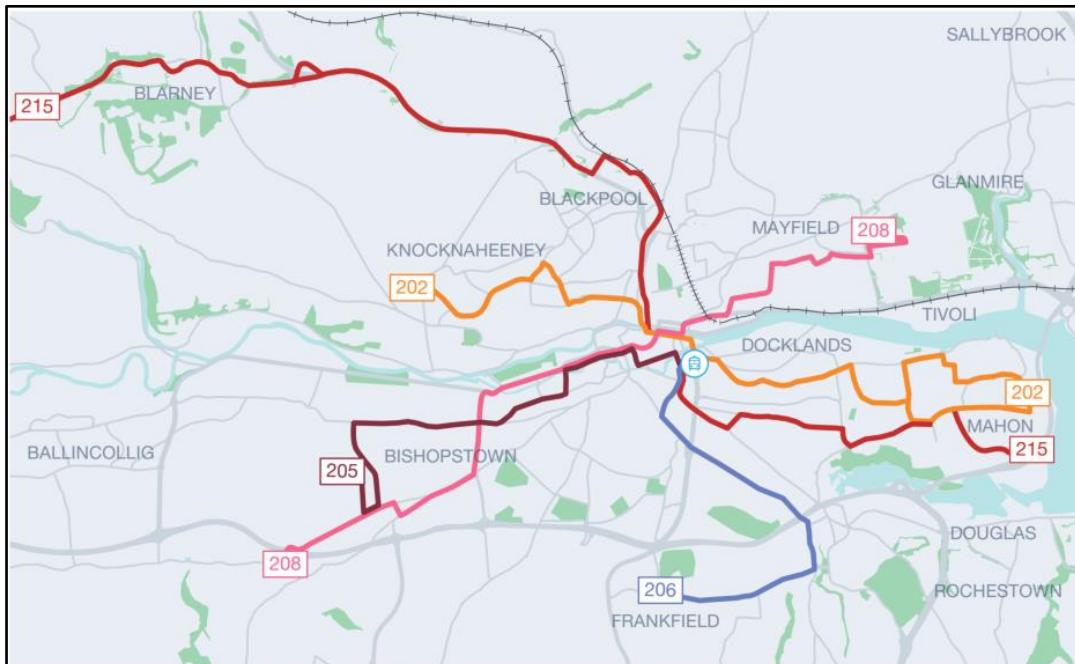


Figure 4-1 - Existing High Frequency Bus Services

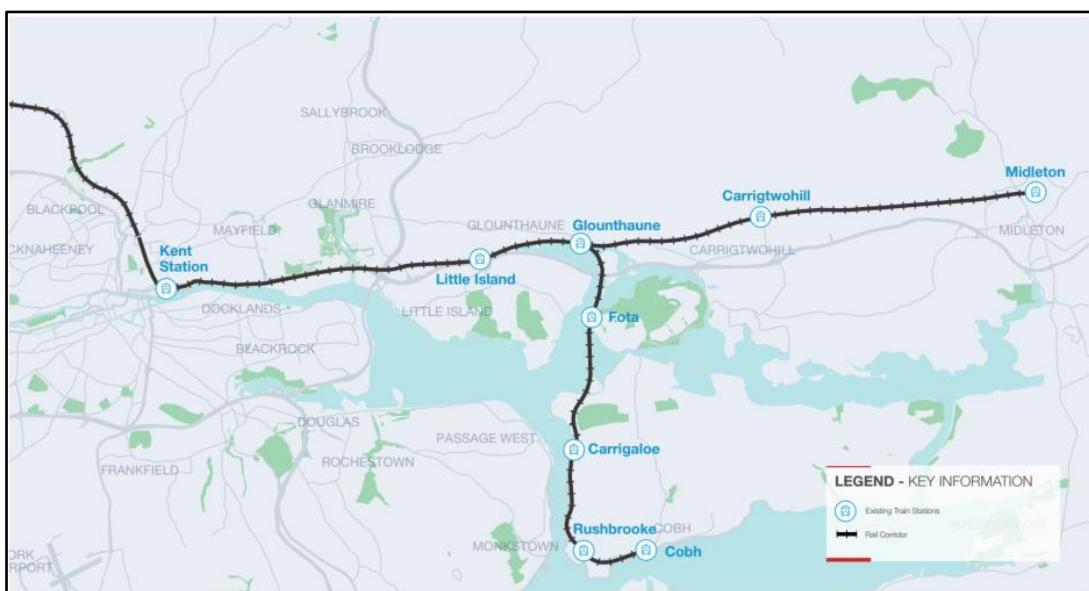


Figure 4-2 - Existing Rail Service

³ High frequency = 1 bus services every 15 to 20 minutes

⁴ https://www.nationaltransport.ie/wp-content/uploads/2020/04/Cork_Met_Area_Transport_Strategy_web.pdf

4.2. Proposed Public Transport Infrastructure

A number of public transport infrastructure projects have been proposed for Cork city as identified in CMATS. The main initiatives are Cork Bus Connects and the Cork City Light Rail Network. While the provision of a high-quality public transport in the city of Cork is welcomed and necessary, the feasibility of delivering these projects in the lifetime of the Draft Development Plan needs to be considered.

According to CMATS, the National Development Plan envisages a significantly enhanced BusConnects for Cork by 2027. This indicates that there will only be a one-year overlap between the Draft Development Plan and the completion of the BusConnects project. It is also noted that BusConnects Dublin, which was initiated in 2017 and opened its first spine in 2021, will not be completed for a number of years. It is not unreasonable to assume that Cork BusConnects, which is at an earlier stage of the process, may not be completed until after 2027.

There are a number of upgrades planned to the suburban rail network. The CMATS timeline for these upgrades indicates that they won't be substantially completed until the medium to long term, well after the termination of the Draft Development Plan. The proposed Light Rail Network will not be completed until the long term.

Along with the public transport initiatives set out above, CMATS has proposed several Park and Ride facilities for Cork City. Park and Ride facilities will only become viable when the accompanying public transport service is operational. As such, the operational timeline of the Park and Facilities are directly linked to the completion of the Cork BusConnects and Cork Light Rail projects. An indicative timeline of the proposed public transport initiatives in Cork city is presented in Figure 4-3.

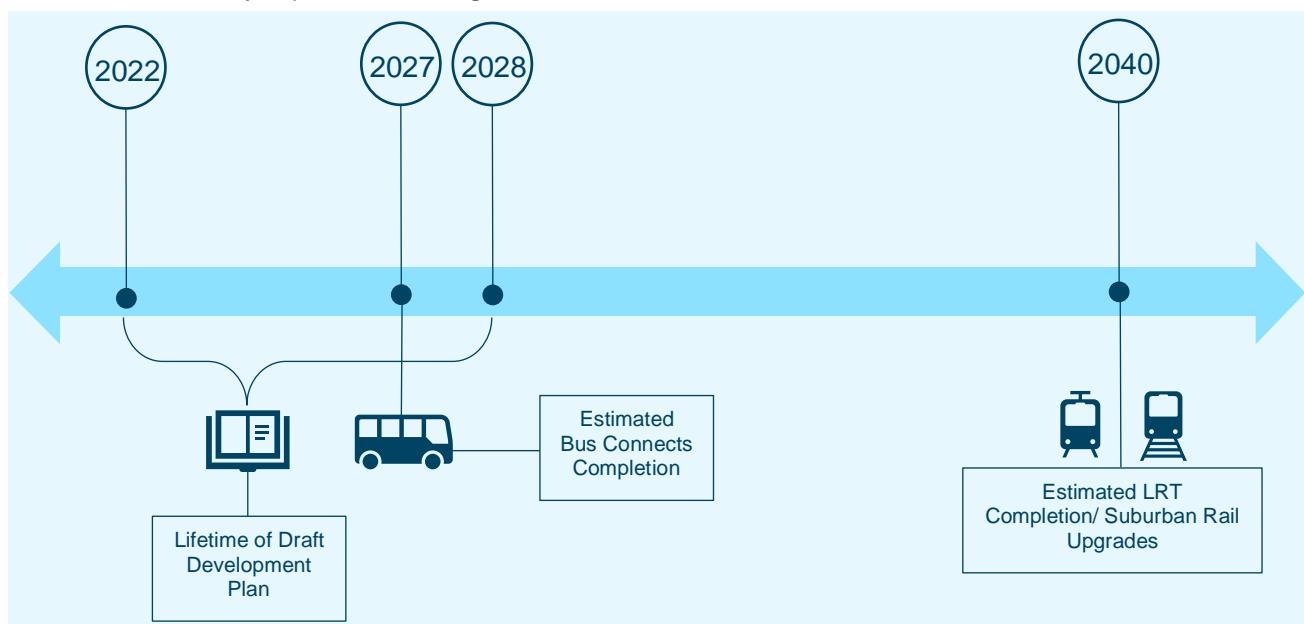


Figure 4-3 – Cork City Public Transport Infrastructure Indicative Timeline

CMATS has set a mode share target of 49.3% for the private car by 2040 in the AM peak. This target implies that the Cork City intends about half of all journeys to be made by private vehicle by the year 2040. These car trips will have to be catered for with a suitable provision of car parking. Table 4-1 presents an indication of the likely car parking space to employee ratio for office developments Cork City under the Draft Development Plan. The proposed standard implies that 1 in 31 employees will drive to work in the city centre and that in Zone 4, the least restrictive zone, 1 in 7 employees will drive to work. However, the target AM Peak mode share for cars is 49.3% indicating that approximately half of all journeys will still be made by private cars.

Table 4-1 - Car Parking Space to Employee Ratio

	Cork City Draft Development Plan Zone 1	Cork City Draft Development Plan Zone 2	Cork City Draft Development Plan Zone 3	Cork City Draft Development Plan Zone 4
Car Parking Standard	1 per 500	1 per 300	1 per 200	1 per 100
Car Park Space to employee ratio	1 space per 31 employees	1 space 19 employees	1 space per 13 employees	1 space per 6 employees

Cork City is entering a period in which it intends to complete a number of public transport upgrades. Many of these upgrades will not be substantially completed until 2031 -2040⁵. The Draft Development Plan will cover the period up to the end of 2028. It is our opinion that the parking standards should at the very least remain as they are under the current development plan until these public transport upgrades are implemented. It is clear that the private car will remain an important part of the transport system until such a time that the public transport infrastructure is in place to facilitate more sustainable trip making in the city.

Furthermore, while the city intends to implement public transport links in the future, certain areas within the city will remain without public transport links. The city boundary has recently been expanded to include surrounding towns and suburbs such as Ballincollig, Douglas, Rochestown, Ballincollig, Tower, Blarney, Glanmire and Cork Airport. While the proposed public transport initiatives will provide links between these areas and the city centre, there will likely be trips generated from outside the city boundary to these areas. Some locations in these areas, such as Cork Airport shown below in Figure 4-4, have been zoned as ZO 11 Business and Tech. These locations, at the outskirts of the city, will likely provide employment for those in the surrounding hinterlands and further afield. Public transport will not be available for many who commute from rural areas to these employment centres.

MAP 15

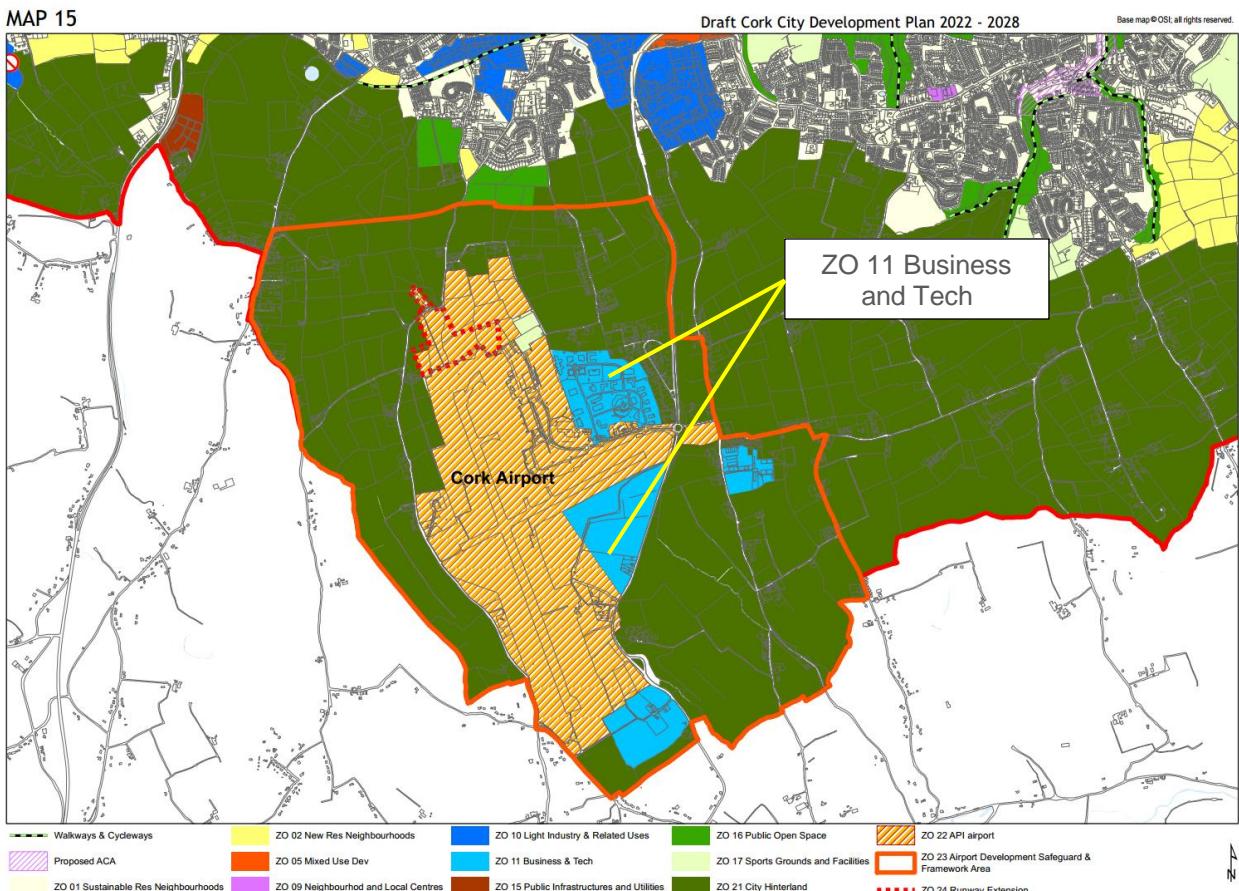


Figure 4-4 - Cork Airport Zoning

⁵ CMATS

5. Transition to Electric Vehicles

The facilitation of local trip making by private in the city developments is implicitly further supported in sustainable national policy which recognises the significant role the private passenger car will continue play in the Irish transport system. The National Climate Plan (2019) has set a target of 936,000 EVs by 2030 including 840,000 passenger EVs.

"To meet the required level of emissions reduction, by 2030, we will:

- *Reduce CO₂ eq. emissions from the sector by 45-50% to 2030 pre NDP projections*
- *Increase the number of EVs to 936,000, comprised of:*
 - 840,000 passenger EV
 - 95,000 electric vans and trucks
 - 1,200 electric buses"

This recognition of the significant role that private car travel will continue to play and its transition to sustainable energy sources will facilitate sustainable car trip making by EVs to city centre locations which are already subject to an appropriate maximum car parking provision in the current development plan. Further restricting parking provision would be contrary to the recognition of the significant role that private car travel will continue to play and will simply serve to undermine the viability of city centre office developments.

JCD provides charging points in many of its developments and will actively seek to increase the number of charging points as appropriate, as the transition to EVs accelerates.

6. Implications of the Proposed Car Parking Standards

6.1. Economic Context

The economic context of the city is a key consideration when examining the car parking standards for office developments in the proposed development plan.

Cork is the second largest metropolitan area in the state. The National Planning Framework (NPF) recognises that,

“Cork is emerging as an international centre of scale and is well placed to complement Dublin but requires significantly accelerated and urban focused growth to more fully achieve this role”.

The Cork Metropolitan Area Strategic Plan (MASP) has stated that Cork is in a strong position to:

- perform as a principle complimentary location to Dublin with a strong international role.
- be the primary driver of economic and population growth in the Region.

Over the past number of years Cork Metropolitan Area has successfully attracted foreign direct investment. It is estimated that an extra 31,000 jobs will be created in the city by 2028 17,980 (58%) of which are expected to be office base roles.

As is demonstrated above, Cork is in a strong position economically as the proposed development plan comes into operation. The intention is for the city to continue to grow economically and increase its role internationally. The Draft Development Plan has set a number of objectives to ensure the city realises its economic potential.

6.2. Transport Imbalance

Public transport in the city is not yet at an adequate level to provide a practical alternative to the private car. While a number of public transport initiatives are proposed, it is not expected that the majority of these will be completed in the lifetime of the Draft Development Plan. The proposed standards under the Draft Development Plan do not align with the reality of the likely public transport provision during the lifetime of the draft plan.

The Cork MASP states *“Connectivity and access are paramount – nationally and internationally - enabled by physical and technology infrastructures with capacity resilience and quality. This has become even more critical in a post-Brexit environment.”*

JCD is concerned that the proposed parking standards will create a lack of good quality access as the public transport infrastructure will not yet be in place to facilitate the trips associated with office developments. This imbalance may hamper the city's economic potential as it seeks to compete with other cities in Ireland and with small- medium sized cities in Europe.

In the Cork context there is a real concern that the proposed car parking standards for new office developments will result in new offices being developed in Cork county where car parking standards are significantly less restrictive but public transport less connected that will result in more single occupancy car trips being realised which is counterproductive to the overall sustainable transport ethos, policy and aims.

Furthermore, there is a risk that the proposed car parking standards will inhibit office construction in Cork City and potential projects may be lost to Ireland entirely. This will impact on the economic and social wellbeing of Cork and the lost revenues from these developments will delay investment in environmental infrastructure and programmes.

7. Interim Practical Measures

In this section, we have proposed some alternative solutions that we believe offer a more flexible approach to achieving a balanced provision of car parking in the city. These solutions should allow the city to maintain a suitable level of parking while facilitating a transition to a lower parking requirement in the future upon the realisation of the proposed transport network envisioned in CMATS.

7.1. Repurposing Car Parks

Demand for urban space is very high. As such, innovations to make better use of the land and infrastructure available in cities are being sought. One such innovation is the repurposing of car parks in urban areas. Demand for car parking spaces in urban areas is expected to dwindle as more trips are made using sustainable transport. New developments which are proposing to include car parks, can design car parks to be more easily converted into another use such as apartments or mobility hubs in the future, when the demand for parking is reduced.

This could prove useful in Cork City as it enters this transitional period. Developments could include car parks according to the existing standard and include a contingency where the car park can be converted into another use when public transport facilities in the city are improved. This measure will maintain the viability of developments currently while precluding the physical infrastructure utilised for car parks from becoming obsolete.

7.2. Workplace Parking Levy

A workplace parking levy (WPL) is a charge made by a local authority on employers for the number of parking spaces provided for employees. All money raised from a WPL must be ring-fenced for investment in local transport improvements.

In 2011, the city of Nottingham introduced a workplace parking levy (WPL). The purpose of the levy was to both provide funding for major public transport initiatives while also incentivising commuters to use other forms of transport. The initiative has been a success with over £75m of new revenue generated since the levy started⁶. Capital raised by the WPL has helped fund extensions to the city's existing tram system and supports the city's Link Bus network. It has also reduced the private car mode share in the city.

A WPL could be implemented in Cork City to generate revenue to contribute towards public transport initiatives like the Light Rail System. This would both incentivise use of public transport while still providing a suitable level of car parking for office developments in this interim period. As the public transport provision improves in the city, it is likely the mode share will shift towards public transport.

⁶ <https://www.transportxtra.com/publications/parking-review/news/68005/the-workplace-parking-levy-nottingham-pioneers-the-way-ahead/>

8. Conclusion

This submission has presented the concerns of JCD in relation to the proposed parking standards for office developments in the Cork City Draft Development Plan 2022-2028. The main points made in the submission are presented below:

- The parking standards for office developments proposed under the Cork City Draft Development Plan will reduce the level of parking for office developments to at least half of what it is under the current plan.
- The proposed parking standards are disproportionately restrictive when compared with the proposed Cork county parking standards. This will discourage office developments in the city as developers seek to locate offices in areas where parking standards are significantly less restrictive. They will also reduce equity in access to employment opportunities.
- The proposed parking standards are more onerous when compared with Dublin, especially in relation to Dublin City Centre. Moreover, Dun Laoghaire Rathdown has produced a Draft Development Plan with new parking standards which are less restrictive than the proposed Cork City parking standards despite having a similar population, lower car mode share and significantly higher levels of public transport provision.
- Public Transport in Cork City is underdeveloped and many of the public transport initiatives identified in CMATS are unlikely to be delivered during the lifetime of the Draft Development Plan. It is considered that the current parking standards are appropriate and should remain in place until such a time that public transport provision in the city can provide a viable alternative to the private car.
- The Climate Action Plan has targeted 840,000 EV's on Irish roads by 2030 to help meet Irelands climate targets. Parking provision for these vehicles will be required.
- Interim alternatives to overly restrictive parking standards have been presented in section. These include repurposing car parks in the future and Workplace Parking Levies. These measures have been used elsewhere successfully to ensure that the car parks of today can be transitioned to alternative uses at a later point in time once public transport becomes available.

As outlined in the evidence and examples within this submission, it is our professional opinion that the introduction of the excessively restrictive Car Parking standards is premature given the existing and proposed public transport available during the lifetime of the plan. This in turn could result in unforeseen economic impacts in terms of viability of office developments and for Cork achieving its employment targets as set out in Project Ireland 2040. These impacts include:

- Developments being lost to Ireland.
- Developments being lost to Cork as they locate in other areas of the country where car parking standards are less restrictive and/or better access to public transport is provided.
- Developments being lost to Cork City as office developments locate in Cork County due to significantly less restrictive parking standards resulting in an increase in single occupancy trips on the road network around Cork.

Cork City Council is respectfully requested to make the amendments to the Draft Cork City Development Plan requested in this submission.

Shane Kelly
WS Atkins Ireland Limited
Atkins House
150 Airside Business Park
Swords
Co. Dublin
K67 K5W4

Tel: +353 1 810 8000

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