

# Submission to Draft Cork CDP

on behalf of Apple Operations Europe Ltd.

October 2021



# Document Control Sheet

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# 1. Executive Summary

This submission has been prepared by McCutcheon Halley Chartered Planning Consultants on behalf of Apple Operations Europe Ltd. in response to public notices inviting submissions from third parties and interested parties on the Draft Cork City Development Plan in accordance with section 12(2)(b) of the Planning and Development Act 2000.

The purpose of this submission is to provide input into the Draft City Development Plan in the context of a major employer in the Cork Region and the role Apple may play in part to contributing to the strategic objectives of the new City Plan in the context of the 'Project Ireland 2040 - National Planning Framework' (NPF) and 'Regional Spatial & Economic Strategy for the Southern Region (RSES).

This submission includes a section outlining Apple in Cork to give background to the basis of the submission. Apple welcomes the opportunity to make a submission to the Draft City Development Plan process, sharing economic, environmental and community engagement by Apple in Cork over the past 40 years.

For clarity, the primary basis of Apple's submission is detailed across four headings below. These will be expanded upon under section 3 of this submission:

## Zoning

- The inclusion of proposed re-zoning of lands to the north of the Apple Campus allowing for further expansion of the established employment lands in the northwest of the City is welcomed.
- Consideration should be given to amending the proposed zoning objective at Hollyhill from 'Light Industry and Related Uses' to '**Business and Technology**' as this objective will better foster continued growth at Hollyhill.

## Building Height Standard

- The 'Inner Urban Suburb' designation on 'Density and Height' Map 9 should be expanded to include all of Apple's Campus.
- Clarification should be provided in the Development Plan to ensure that target heights are not interpreted as minimum or maximum standards. We request that the Development Plan clearly state that;
  - Cork City Building Height Standards provide indicative height targets. These targets shall not be used as minimum or maximum standards for height in any area of the City.

- The building height 'targets' are a guide to be used as part of a detailed assessment of a proposed development. Buildings should only be considered tall when it above 6 storeys in height and only then when it is 50% higher than the adjacent buildings.

#### **Car Parking – Standards need to reflect Campus location**

- That the maximum car parking standards at Hollyhill are revised to reflect the site's edge of City location, topography and existing public transportation service.
- That an area specific car parking standard be applied to the 7 no. Strategic Employment Sites.
- The Draft Development Plan be amended to provide a maximum standard of **1 space per 25m<sup>2</sup> GFA** be applied to Offices, Enterprise & Employment Uses at Hollyhill.
- A report detailing transitional arrangements tied to the delivery and bedding in of improvements to the public transportation network and the delivery of walkway/cycleway should be detailed in future applications for development.

#### **Transport and Mobility**

- Investment to the public transport network serving Hollyhill.
- Delivery of Core Bus Route 5 from CMATS.
- Delivery of a primary cycle route which was identified along Harbour View Road / Cathedral Road linking the Hollyhill Industrial Estate & regeneration area with the City Centre.
- Delivery of strategic road networks.
- Reconsider the route of the proposed walkway/cycleway on Map 9 to provide a route which can be achieved during the lifetime of the Plan i.e., on lands in public ownership. The new route should provide a route (suggesting to be overlooked with passive surveillance) from the community to ensure a safe and secure route that will benefit residents and employers.

We respectfully request that the planning authority give consideration to the issues raised in this submission and we trust that our submission will be taken into account in the preparation of the 2022-2028 Cork City Development Plan.

## 2. Apple in Cork

Apple has a long and proud history in Cork. As the location of its European Headquarters, Cork has provided a strong foundation for Apple, helping it become the company it is today. Apple's reasons for choosing Cork over 40 years ago to be the first operation outside the US, and the gateway for Apple to Europe, remains the same today. Cork sits at a geopolitical, economic and cultural meeting point, offering significant scope for future innovation and progress.

Starting with just 60 employees in 1980, Cork is now home to over 6,000 Apple employees, from over 90 nationalities. The diversity of the Apple employees who choose to live and work in Cork is a testament to the City's designation as a Healthy City by the World Health Organisation for '*offering an inclusive and vibrant environment*'. Apple welcomes the policies and objectives in the Draft City Development Plan which continue to recognise and support the cultural diversity of the City making it an attractive location to live and work.

### *Economic opportunities*

The original manufacturing facility has expanded to include all parts of Apple, with teams focused on research, customer care, operations, sales and logistics.

Apple continues to expand the skills and capabilities based in Cork, continually investing across several business units and teams. This includes a recent focus on teams dedicated to Artificial Intelligence / Machine Learning (AIML) and testing and measurement.

In addition to being the largest private employer in Cork, Apple provides significant indirect employment and wider economic opportunities across Cork and Ireland. Apple has over 380 suppliers in Ireland, many in Cork and the southwest. In addition the App Store Ecosystem supports over 17,000 jobs in Ireland.

### *Environmental sustainability*

The Cork campus, like all Apple facilities, runs on 100 percent clean energy. It features more than 200 solar thermal panels and rainwater is harvested from the roof to supply facilities across the campus. The campus has also achieved Zero Waste to Landfill, including for its manufacturing facility.

Apple consistently looks at ways to improve biodiversity on and around the campus. A wildflower meadow offers a sanctuary for a number of insects, birds and other wildlife. Landscaping is made up predominately with trees and shrubs from Irish Nurseries. On site catering uses only locally sourced meat and fish, including honey from Apple's own beehives. Food waste goes to anaerobic digestion and produces biogas.

While the current transport options require many employees to drive to the campus, Apple encourages employees to use more sustainable forms of

transport, such as the shuttle bus it provides and cycling, with provision for 96 secure lockers and also 2 accessible shelters for bicycles.

### ***Community involvement***

Since 2015, Apple's Giving programme in Cork has supported more than 400 registered charities in Ireland. Causes supported span health and wellbeing, accessibility, education, environment and community action.

Since the onset of the pandemic in March 2020, Apple employees have volunteered more than 115,000 hours to support charitable causes, with Apple matching this time with a monetary donation to the same charity.

Education continues to be an important part of Apple's community involvement. Apple has long-held, close relationships with a variety of schools and academic institutions in and around Cork. In addition, Apple has also brought more than 1,600 students from across Ireland to the Cork campus as part of Apple's Transition Year experience.

### ***Location - Apple's Hollyhill Campus***

Apple's campus comprises of circa 20 hectares in the Hollyhill Industrial Estate. The extension to Cork City Council's administrative area has resulted in the Hollyhill Industrial Estate now being entirely within City's Boundary, however in the context of the surrounding lands, Apple's Campus remains on the extreme edge of the City and is removed from the urban core of the Centre.

While this location can pose challenges in terms of connectivity to the rest of the City it also provides Apple an autonomy that is required in their industry.

### 3. Key Points to Draft Cork City Development Plan 2022-2028

The Draft Cork City Development Plan proposes a framework for development in the expanded City up to 2028. Significant population and economic growth for Cork is envisioned during this timeframe and beyond. To facilitate this growth, a commitment of public investment to deliver the initial phases of key infrastructure is required.

To ensure that the employment growth envisioned in the Draft City Plan is achieved, consideration needs to be given to how the objectives of the Plan will be implemented and that a balance is struck between the 9 strategic objectives of the Plan:

- SO1 – Compact Liveable Growth
- SO2 – Delivering Homes and Communities
- SO3 – Transport & Mobility
- SO4 – Climate and Environment
- SO5 – Green & Blue Infrastructure, Open Space & Biodiversity
- SO6 – Economy and Employment
- SO7 – Heritage, Arts and Culture
- SO8 – Environmental Infrastructure
- SO9 – Placemaking & Managing Development

We submit that in order for a balance of the strategic objectives of the Development Plan to be met, there needs to be clarity on how these objectives will realistically be achieved during the lifetime of the Plan. Furthermore, we consider that action is required which follows through to actual implementation and delivery of key improvements to the public infrastructure particularly as they relate to transportation.

This submission will address the following key points of which we consider it is imperative that the Council address in the preparation the new Cork City Development Plan so that the Plan provides for opportunities for growth at Apple's Hollyhill Campus:

1. Zoning
2. Building Height
3. Car Parking
4. Transportation



### 3.1 Zoning

We welcome the inclusion of proposed re-zoning of lands to the north of the Apple Campus to allow for the further expansion of the established employment lands in the northwest of the City. However, we note that the Draft Plan proposes no change to the 'Light Industry and Related Uses' for the Apple Campus. The primary uses in this zone is the manufacturing of a physical product with office use ancillary to 'the main light industry, manufacturing or employment use' also considered acceptable. While this zoning objective has not limited development on the Apple Campus, we consider that the given the types and scale of development that has been permitted by Cork City Council in recent years that a more progressive objective which better reflects that Hollyhill is the location of Apple's European Headquarters. A request for change to the approach to employment zoning in the new City Plan was raised in a submission made on Apple's behalf as part of the first phase of consultation process and it is disappointing that this has not been addressed the Draft Plan.

As part of the review of the City Development Plan, a detailed review of the existing employment lands was undertaken to determine the capacity of existing zoned lands and the quantum of additional zoning which was required to facilitate the growth of the City. This review resulted in 7 no. new strategic employment sites being identified in the Draft Cork CDP including 15.7 hectares at Hollyhill, which includes circa 5 hectares on lands zoned NE-B-02 – Business Development in the 2017 Cobh Municipal District Local Area Plan.

In designating Hollyhill as strategic employment site, the Draft Cork CDP specifies that the lands at Hollyhill are:

*To provide for a high-quality **business and technology** scheme capable of accommodating expansion and other strategic investment in a manner that seeks to protect the surrounding landscape setting.*

We consider that the 'Light Industry and Related Uses' zoning in the Draft Cork CDP is inconsistent with the broader strategic objectives in the Plan in relation to the employment sites which specifies a 'high-quality business and technology use' for the lands to the north of the Apple Campus.

Apple's existing use at their Hollyhill Campus was founded on light industrial/manufacturing when the company first established a presence in Cork in the 1980's. As Apple have continued to invest in their Cork Campus, the company has evolved and the campus now consist of a mix of uses associated with their operational requirements in line with their role as Apple's European headquarters. Cork City Council has been supportive of Apple's continued and significant expansion on their campus over the past 40 years.

We consider that the existing zoning at Hollyhill reflects the past and that a more progressive zoning objective that should be applied to this strategic employment area which allows for new uses. This approach would also be

consistent with Objective 7.10 of the Draft Cork CDP which identifies Hollyhill for 'high-quality business and technology'.

We submit that the zoning for Hollyhill should be amended in order to reflect both the current uses on the Apple Campus and the strategic objectives of the Draft Development Plan. We submit that a more appropriate zoning for this area is 'ZO11 Business and Technology'.

The Draft Cork CDP states that, 'The main purpose of this zoning objective is to facilitate opportunities for high technology office-based industry, advanced manufacturing, major office and research and development-based employment'.

Furthermore, this zoning also still provides the opportunity for light industrial development with Paragraph ZO 11.3 stating that;

*Other uses that may be acceptable in this zone, subject to local considerations, include light industrial uses set out in ZO 10 Light Industry and Related Uses.*

We submit that the re-zoning of these lands from Light Industry to Business and Technology will provide greater flexibility for new employment in the area while still providing an option for light industry uses.

### 3.2 Building Height

The Draft Cork CDP has introduced a building height strategy which provides a guidance on height in relation to the new development based on the prevailing heights of the area and the site's location within the City. The Apple Campus falls within 2 designations, 'Inner Urban Suburb' and 'Outer Suburb'. With the existing car park being identified as Outer Suburb.

The 'prevailing heights' have been assessed based on neighbourhoods defined in the Draft Cork CDP with the Hollyhill Campus forming part of the Knocknaheeny neighbourhood. Outside of the Apple Campus, this neighbourhood primarily consists of an established residential area comprising of 1 to 2 storey houses and older, low-level industrial buildings in the Hollymount Industrial Estate.

The prevailing height of Knocknaheeny does not reflect the building heights already established on the Apple Campus which includes two 4 storey office buildings (excluding roof enclosures and 20 metres tall). Table 11.1 of the Draft Cork CDP outlines the 'Target' upper and lower heights for new development. The targets number of storeys for both the North West Inner Urban Suburb and Outer Suburbs is a lower target of 2 storeys and an upper target of 4 storeys.

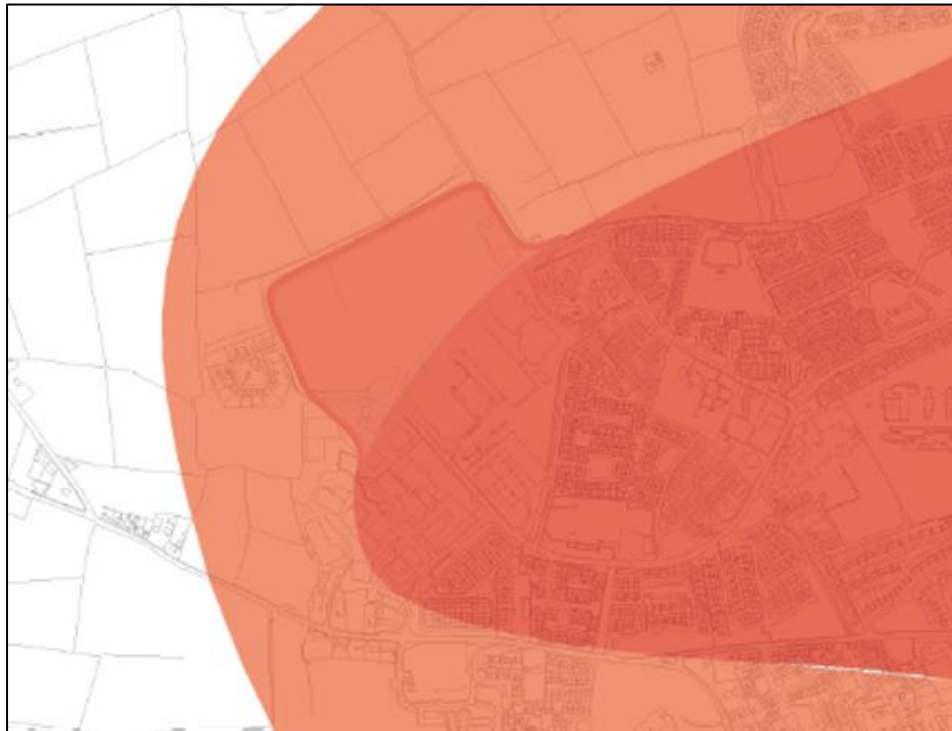


Figure 1 : Proposed extension if the 'Inner Urban Suburb' designation on 'Density and Height' Map 9 to include all of Apple's Campus.

While these heights are identified as 'targets', we consider there is a risk that these heights will be strictly adhered to and not allow for an increase in height in locations where this can be accommodated and appropriately designed.

The Draft Cork CDP 's 'Cityscape and Building Height' strategy has been informed by the 'Cork City Urban Density Building Height and Tall Building Study 2021'. This Study provides more guidance on how the prevailing heights should inform future development proposals noting that;

*...some locations across the site characterised by low-rise building no higher than 2 storeys, this equation would suggest that any building higher than 3 storeys could be considered tall in a local context. This would be unhelpful and could serve to undermine the development management process which seeks to ensure the best use is made of land.*

*In light of this, only buildings above 6 storeys or 18m should be considered tall, and only then when they are significantly (50%) higher than those around them.*

We submit the further clarification should be provided in the Cork City Development Plan to provide certainty that the height targets outlined in the Draft Cork CDP are not restrictions on sustainable development in appropriate locations where increased height above the targeted levels can be accommodated.

We request the Development Plan should clearly state that Cork City Building Height Standards provide indicative height targets. These targets shall not be used as minimum or maximum standards for height in any area of the City. In considering applications for development, the building height 'targets' outline in the development plan should only be used as a guide to as part of a detailed assessment of a proposed development. A building should only be considered tall when it above 6 storeys in height and only then when it is 50% higher than the adjacent buildings.

We consider that these proposed amendments will provide greater clarity in the application of the new building height strategy without inadvertently applying overly restrictive 'target's to new development.

### 3.3 Car Parking

The car parking standards proposed in Chapter 11 of the Draft Cork CDP reflect a significant change to standards in the 2015 City Development Plan and an even more significant departure from those part of the City currently governed by the 2014 Cork County Development Plan.

Apple's location in the City has always been at the urban edge of the City with the northern part of their campus previously being located with the Cork County.

The maximum car parking standards proposed in Table 11.13 of the Draft Cork CDP reflect a significant departure from the standards that are currently in place in the City. Apple's Hollyhill Campus is identified in being in 'Zone 2' in the Draft Cork CDP which states:

*Parking Zone 2 reflects areas that **are or will** be accessible to mass transit on the form of Light Rail Transit or BusConnects and encompasses most the city suburbs.*

We would like to highlight that the timeframe for the Development Plan is 2022 through to 2028. The mass transit envisioned for Cork City will be implemented over a timeframe that extends well beyond this timeframe (up to 2040) with no plan for transitional arrangements in line with the actual delivery of the improvements to public transportation. Apple are currently reviewing their future requirements at Hollyhill and are in the process of updating their masterplan for the Campus. As part of this process, it is necessary to consider and plan for how access to the Campus can be improved in order to attract and retain staff. As outlined in Section 3.4 of this submission, sustainable transport options are supported and encouraged by Apple. Given their location and topography, planned improvements to the public network are required to be delivered and bedded in to achieve a sustained modal shift in how employees travel to work.

We consider that the lack of transitional arrangements which have regard to the actual delivery of public transport will potentially impact the rate at which economic growth can be delivered in some part of the City. We consider that transitional arrangements could be implemented as part of the new Development Plan which would provide flexibility and support for new

development in line with a comprehensive Mobility Management Plan that provides for innovative solutions to address this transitional period.

The following table provides a comparison of the standards which currently apply to the Apple's Campus, including the 2014 Cork County Development Plan standards that apply to the northern part of the campus.

Land Use Category	2014 County Development Plan Standard	2015 City Development Plan Standard	Draft Cork CDP Maximum No. Spaces
Offices Enterprise & Employment	1 space per 25m <sup>2</sup> GFA	1 space per 50m <sup>2</sup> GFA	1 space per 300m <sup>2</sup> GFA

Table 1 : Car parking standard comparison.

The proposed car parking standards will result in the maximum car parking spaces achievable on the Campus being a sixth of the current City Standard or a twelfth of what would be accepted in the City's North Environs in the County Development Plan. While Apple are supportive of the planned improvements to the public transport network, the proposed reduction in car parking standards is being implemented well in advance of these improvements. This level of change will be unsustainable to support growth on the Apple Campus whilst also supporting development in the strategic development sites.

The current City Development Plan has a parking requirement of 1 space per 50m<sup>2</sup> of development while the adjacent County Development Plan has 1 space per 25 m<sup>2</sup> of development. We would contend that these parking standards are more reflective of what has historically been permitted at Apple and the current needs of large employment area remote from the city centre.

We recognise with the delivery of the improvements to public transportation envisioned for Cork City, the car parking required to foster the economic development of the City will decrease over time. In some areas of the City, the impact of the delivery will be more quickly realised, however in areas on the outskirts of the established urban area there is a need to address that until such time as these improvements are realised that there is a genuine need for car parking in excess of the levels being proposed in the Draft Plan.

### 3.4 Transport and Mobility

Apple are continuously improving transportation options to the Campus and over the last number of years have invested in a number of positive changes to encourage employees to use more sustainable transport options. These improvements to transport have included a dedicated commute App which provides employees with bus schedules and real time information, additional secured bicycle storage, the provision of shower & drying room facilities, the ongoing promotion of car pooling onsite, the provision of e-car charging

facilities, the continued implementation and updating of Apple's Mobility Management Plan.

To this end Apple is fully supportive of the Draft Cork City Development Plan's stated aims to deliver an integrated transport network that seeks to address the needs of all modes of transport, offering choice that results in an improved network performance and supports economic growth within the city.

Over the last number of years there has been significant growth in the north's side of the city particularly around Hollyhill, through the continued growth of business within Hollyhill Industrial Estate and the regeneration of Knocknaheeny. Yet despite this growth, connectivity to the rest of the city and suburban communities in the northside of the city and investment in public infrastructure remains limited.

For improved uptake of alternative transport modes, there is a need for an investment in public infrastructure. One of the most efficient ways to implement change, is to invest and improve services to existing areas, where there's sufficient density and an established user base to support this investment. The Draft Development Plan & Cork Metropolitan Area Transport Study (CMATS) identifies a number of key improvements to the transport network within the northside, including a high quality bus corridor from Hollyhill to the city centre and the development of a primary cycle network linking the city centre with the Hollyhill Industrial Estate.

Transit ridership to the Campus has grown significantly over the last number of years due to Apple providing a private shuttle to support the demand. The provision of direct, clean, reliable services has shown to have a significant positive impact on ridership. As part of CMATS the advancement of Core Bus Route 5 from the city centre, will be a significant boost for public transit in the area for both industry and local residents. Furthermore, the northside would also benefit from a direct bus connection for the rail network including Kent Station and planned suburban rail network. With CMATS proposing a station at Blackpool/Kilbarry, that there is an opportunity to encourage greater use of the proposed suburban rail network by providing a more direct link to Hollyhill.

The topography of the northside has in the past been an obstacle to cycling, however, the growth and advancements in micromobility provides a unique opportunity to residents and employers overcome this barrier. A primary cycle route has been identified along Harbour View Road / Cathedral Road linking the Hollyhill Industrial Estate & regeneration area with the City Centre. Currently there are dedicated cycling facilities along Harbour View road. The extension of dedicated cycling facilities along the remainder of this route to the city centre will greatly improve connectivity with the city centre & safety for users along this route.

The proposed walkway/cycleway along Nash's Boreen is a welcomed amenity to the area. However we note that the route of the walkway/cycleway has not been amended since the 2014 City Development Plan. We understand that lands to rear of the existing houses along this route have been transferred to

local residents and now forms part of the rear garden of these houses. The proposed routing of this walkway/cycleway to the immediate north of the Apple campus raises some security concerns, as there's a lack of passive security and may encourage antisocial behaviour and discourage use on this section of the walkway/cycleway. We request that the route of the walkway/cycleway be amended to reflect the changes to ownership along the route since the adoption of the 2015 City Development Plan and the specific security concerns associated with the lack of passive surveillance along the proposed route.

The timing of the delivery of public transport plays a fundamental role to ensuring sustainable transport is delivered to the Apple Campus. While Apple is supportive of the strategic objectives, timely delivery of the improvements to the public network is vital to ensure Cork stays competitive. CMATS provides a framework that extends to 2040 which is clearly outside the timeframe of the new Development Plan.

## 4. Summary

We consider that this first Development Plan following the expansion of the City's boundary will lay the strategic foundation for how Cork City will grow and prosper from beyond the lifetime of the Plan and submit that the objectives of this Development Plan need to be carefully considered so that they provide the best opportunities for growth. The Strategic Objectives outlined in the Draft Plan set a commendable approach for the City's future that needs to be balanced with achievable goals in relation to the delivery of public infrastructure.

The main points included in this submission are summarised as follows:

1. **Zoning** – To maximise the employment opportunities available in Hollyhill a more appropriate zoning objective for both the Apple Campus and the new strategic employment lands to the north are for these lands to be zoned 'Business and Technology'.
2. **Building Height Standards** – A consistent approach to the Apple Campus is requested so that the entirety of the Campus is designated as 'Inner Urban Suburb'. Furthermore, clarification in the Development Plan on how 'target' heights are applied should be provided so that sustainable development can be achieved on sites where increased height is appropriate.
3. **Car Parking** – The car parking standards need to reflect Apple's location at the urban edge of the City and the current availability of public transportation and safe cycle routes. It is proposed that the car parking standard of 1 space per 25m<sup>2</sup>, which applies to the northern part of the campus, be maintained in the new Development Plan.

We consider that the Development Plan should provide for transitional car parking arrangements for strategic employment sites on the outskirts of the established urban area to allow for future growth and expansion. We submit that the Plan should allow for transitional arrangements in advance of the delivery of improvements to the public transportation network serving that area. Proposed development in these areas should be accompanied by a site specific report which ties the level of car parking to the delivery and successful implementation of improvements to the public transportation network and walkway/cycleway network in the City.



- 4. Transport and Mobility** – The initial implementation of the CMATS and the continued investment in public transportation is welcomed. The actual delivery of these public transportation improvements during the lifetime of the Plan should be considered as part of the wider policies and objectives of the Development Plan.

It is also requested that the proposed route of the walkway/cycleway on Map 9 be reconsidered as the current alignment will result in back land areas being unsupervised. We submit that all proposed walkway/cycleways should benefit from **passive surveillance** so they are safe and actively used.

We respectfully request that the planning authority give consideration to the strategic issues raised in this submission and we trust that our submission will be taken into account as part of the consultation process for the review of the upcoming Development Plan.