

Strategic and Economic Development,
Cork City Council
City Hall
Anglesea Street
Cork

27 April 2022

**Re: Submission to the Proposed Material Alterations to the Draft Cork City
Development Plan 2022-2028 –
Proposed Amendment No. 1.149 & Proposed Zoning Amendment No. 2.92**

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Dear Sir/ Madam

We act on behalf of Michael O'Regan and wish to make the following observation to the proposed Material Alterations to the Draft Cork City Development Plan 2022-2028 (Draft DP) in relation to the zoning of lands in the north-western environs of the Cork City in our client's ownership.



Figure 1 Site Location Map

The subject lands are located in Clogheen, and adjacent to the Apple Campus. Our client welcomed the fact that these lands were identified in the Draft DP as one of the new Strategic Employment Locations, namely the '*Clogheen Business Park Extension*'.

Proposed Amendment No. 1.149 and Proposed Zoning Amendment No. 2.92 both relate to the Clogheen Business Park Extension and are conflicting with Proposed Amendment No. 1.149 proposing to "*Modify Site extents of Strategic Employment Site 2 (Clogheen Business Park Extension) and update site area (3ha)*" whereas Proposed Zoning Amendment No. 2.92 proposes

the complete omission of the Clogheen Business Park Extension with the proposed change from ZO 10 Light Industry & Related Uses to ZO 21 City Hinterland. No justification for the omission or reduction of the Clogheen Business Park Extension has been provided, but we consider the reduction may be due to concerns about the future road infrastructure requirements of the proposed Northern Distributor Road. However, we understand that the preferred route for same has recently been identified and that it does not impact on these lands. We respectfully submit that there is no reasonable or policy basis to adopt the alteration in question and reduce the much-needed provision of employment zoning in the north-eastern environs of the city.

Request

that the Council revert the zoning ZO 10 Light Industry and Related Uses to that indicated in the Draft City Development Plan.

Background

The lands at Clogheen were identified in the Cork Strategic Employment Locations Study 2021 (SELS) as suitable for strategic employment zoning. This translated in the lands being included in the 7 no. new strategic employment locations identified in the Draft DP.

However, as demonstrated in the Figure 2, while all c. 8 ha of the subject lands were zoned ZO 10 Light Industry and Related Uses in the Draft Plan presented to the Councillors in May 2021, by April 2022 this area of employment zoning, which constituted the 'Clogheen Business Park Extension' has completely disappeared. It has been gradually eroded over the plan development process with the current proposed Material Alteration (Amendment Ref. 2.92) rezoning the remaining 6ha to ZO 21 City Hinterland (c. 4 ha) and ZO 1 Sustainable Residential Neighbourhoods (Amendment Ref. 2.91). The timeline of this significant zoning change over the plan development process is outlined in Table 1.

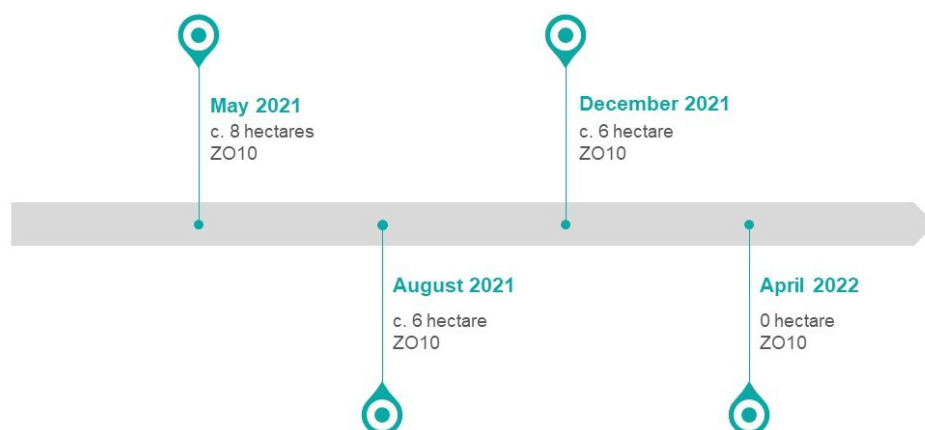


Figure 2 Employment Zoning Timeline

This submission demonstrates that the underlying rationale, as set out in the SELS, for identifying these lands as suitable for development as a Strategic Employment Location still stands. Furthermore, any concerns about the impact of the proposed Northern Distributor route on these

lands have now been established to be unfounded in the context of the recently identified preferred route.





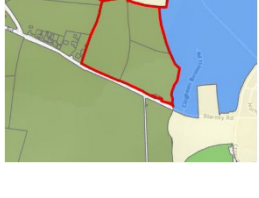
	<ul style="list-style-type: none"> In May 2021, all the c. 8 ha of the subject lands were zoned ZO 10 Light Industry and Related Uses in the Draft Plan presented to the Councillors.
	<ul style="list-style-type: none"> In August 2021, the western portion (c. 2 ha) was omitted the final published Draft City Plan due to concerns that the lands may be within the route selection corridor for the Northern Distributor Road.
	<ul style="list-style-type: none"> In December 2021 the Chief Executives Report (response to submission 56) reiterated that significant land (c. 6ha) was already zoned ZO 10 Light Industry and Related Uses to west of the existing employment site to allow for expansion at Clogheen. Due to concerns about compact growth and future road infrastructure requirements, they did not recommend re-zoning the 2 ha portion of the lands.
	<ul style="list-style-type: none"> In April 2022, in the Written Statement of the Proposed Material Alterations (MA) to the Draft Plan it was proposed to reduce the 6 ha ZO 10 Light Industry and Related Uses to 3ha (Amendment 1.149).
	<ul style="list-style-type: none"> In the April 2022 MA Mapped Objectives it is proposed to <ul style="list-style-type: none"> » rezone 4 ha of the remaining ZO 10 Light Industry and Related Uses to ZO 21 City Hinterland (amendment 2.92), » rezone 2 ha of the remaining ZO 10 Light Industry and Related Uses to ZO 1 Sustainable Residential Neighbourhoods (amendment 2.91).

Table 1 Timeline of Zoning Evolution over Plan Development Process

Strategic Employment Location

The North-west City Environs has currently the lowest quantum of existing industrial floorspace in the city, outside of the City Hinterland ¹. Alongside this, none is classified as grade A, with much industrial stock in the area now comprised of older low-grade buildings ². It should also be noted that the unemployment rate in the North-west City Environs at 23% is significantly higher than any other area in the city. While the area has almost 1 job per resident worker, most of these are concentrated in the small area represented by Apple’s European Headquarters, where the employment hotspot is immediately juxtaposed with areas of high unemployment. The SELS highlights the mismatch between employment types and resident worker skills base in the North-

¹ Ref Figure 4.4 in the Cork City Strategic Employment Locations Study (SELS)

² Ref Table 4.6 SELS

west City Environs, where 52% of those employed in the area have third level qualifications, in comparison with 11% of the resident workers. This discrepancy which is the biggest across the city reflects the strong technology focus of the available jobs in the area and a lack of diversity in the types of employment in the area, resulting in a mismatch between the available employment and the socio-economic profile of the local demographic. The SELS sought to address this mismatch and identified the 'Clogheen Business Park Extension' amongst the new Strategic Employment Locations. The success of the existing business park at this location makes it an ideal location for the expansion and clustering of this use, with the view to assisting positively in providing additional industrial jobs and adding diversity to the employment options in an area of high unemployment.

Industrial Employment Decanting and Rezoning

We consider all the rationale behind the identification of the subject lands as suitable for development as a Strategic Employment Location still stands. In fact, we consider the employment zoning of these lands is now more imperative based on the following reasons.

The redevelopment of the Dockland and Tramore Valley in accordance with Cork City Council's policies to promote the more efficient use, will result in approximately 4,000 jobs being displaced over time. The profile of many of these jobs are typically light industrial, bulk breaking, storage and distribution. There is a real and urgent requirement to identify suitable alternative sites for these employment uses and displaced jobs.

We note that a significant portion of the existing Kilbarry Strategic Employment Location is being rezoned for residential use, further reducing the already limited industrial employment on the northside of the city. Alongside this the proposed Blarney Business Park Extension is not being progressed. Furthermore, in the Material Amendment to the Draft DP it is evident that significant other areas of ZO 10 Light Industry and Related Uses zoned lands in the North-west environs have been re-zoned:

- Zoning Amendment 2.88 Hollyhill changed to ZO11 Business and Technology,
- Zoning Amendment 2.90 Nash's Boreen/Upper Fairhill changed to ZO1 Sustainable Residential Neighbourhoods,
- Zoning Amendment 2.91 Lands adjacent to St Anthony's Park, Hollyhill changed to ZO1 Sustainable Residential Neighbourhoods,
- Zoning Amendment 2.93 Nash's Boreen changed to ZO17 Sports Ground & Facilities.

In this context it would appear that the current employment zoning provision as proposed in the Material Alteration to the Draft DP further limits the future employment opportunities in the northside of the city and does little to address the long-standing issue of unemployment and the mismatch between the available employment type and the socio-economic profile of the area.

Proposed Northern Distributor Route

As noted in Figure 3, the indicative route of the proposed Northern Distributor Road, as identified in CMATS in 2019, bisects the subject site. This study area is indicative in nature and in the vicinity of the subject site extends to a c. 3.7km corridor. However, on the basis of this, the Chief Executives cited *'future road infrastructure requirements'* as the principal rationale behind restricting the ZO 10 Light Industry and Related Uses zoning to 6ha area in the Draft DP rather than reverting to the original proposed zoning of 8ha as requested in our client's submission (Submission Reference: 56).

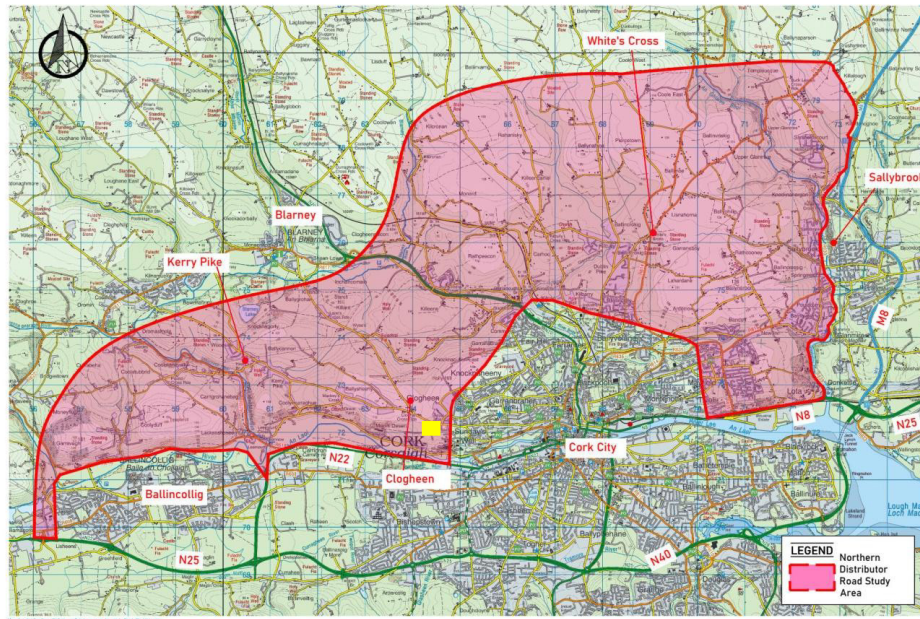


Figure 3 Route Selection Project Brief Study Area Map

However, the Strategic Assessment Report for the Cork Northern Distributor Multi-modal Route was submitted to the National Transport Authority earlier this year by RPS Consulting Engineers Ltd. The preferred route has now been identified and will be published shortly. We understand this route does not impact on the subject site.

Furthermore, future road infrastructure requirements were not a consideration in relation to the residential zoned lands to the north of the subject site, also within the route selection study area. Therefore, we consider it is appropriate that the employment zoning for this identified Strategic Employment Location be reverted.

Local Community Response

We note the duplicate submission 369 / 416 to the Draft Plan requested that the western section of subject lands be zoned for residential use, alongside the employment use. It suggests that as:

'large amounts of land around the city are already zoned for industrial use and large areas of lands are proposed to be zoned ZO 10 for Light industry and Related uses North of Apple and at Blarney Business Park'

It requests that a more modest extension to the industrial zoning at Clogheen, in conjunction with a residential zoning would be more appropriate. However, we note that the ZO10 lands north of Apple referred to are subject to zoning Amendment 2.88 and have been changed to ZO11 Business and Technology. Similarly, the Blarney Business Park extension referred to is not being progressed. We consider it noteworthy, however that the submission did request the retention of the industrial zoning, albeit in a reduced form.

We note that the Chief Executive did not accept this proposal. Notwithstanding the above we are unaware of any objections to the use of part or all of the lands per se for employment use.

Conclusion

The SELS identified a clear juxtaposition between high job numbers and high unemployment rates in the North-west environs where available jobs may not cater for the skillsets of the local demographic. The Draft DP set out to address this imbalance and to cater for the significant requirement to decant up to 4,000 industrial jobs from the Docks and Tramore Valley across the city. While the pressing need for new residential development must be prioritised, a balanced approach should be adopted if the pattern of high unemployment in the north-west of the city is to be addressed.

The Material Amendments to the Draft DP includes proposals to re-zoning significant areas of ZO10 lands in the northside of the site, including the subject lands. We consider this will perpetuate the employment issues that pertain to this part of the city and the result in a dichotomy in the city's future development.

In view of the identification of the preferred route for the Northern Distributor Road which we understand does not impact on the subject site, we consider it imperative that the ZO10 be retained at Clogheen to provide a suitable mix of employment opportunities in the area. We respectfully submit that there is no reasonable or policy basis to adopt the alteration in question and reduce the much-needed provision of employment zoning in the north-western environs of the city.

Please do not hesitate to contact us if you have any queries.

Yours Sincerely



Harry Walsh
HW Planning