

Development Plan Submissions
Strategic and Economic Development
Cork City Council
City Hall
Anglesea Street
Cork

28th April 2022

Re: Proposed Material Alterations to the Cork City Development Plan 2022-2028

Dear Sir or Madam,

McCutcheon Halley has prepared this submission on behalf of Apple Operations Europe Ltd. in response to public notices inviting submissions from third parties and interested parties in relation to the proposed material alterations to the Draft Development Plan.

This submission refers specifically to the following material alterations to Volumes 1 and 3 of the Draft City Development Plan 2022-2028:

- Zoning Amendment 2.88 – Proposed ‘Business & Technology’
- Amendment No. 1.332 – ‘Car Parking Standards’
- Zoning Amendment No. 2.91 – Proposed ‘Sustainable Residential Neighbourhoods’

Apple has actively engaged at all stages of the public consultation process in relation to the review of the Cork City Development Plan and welcomes the opportunity to continue to provide input into the new Development Plan that will guide the future development of Cork City and their role as a major employer in the City.

Our client is seeking non-material changes to Proposed Material Amendments to the Cork City Development Plan 2022-2029 (CDP).

Zoning Amendment 2.88 – Business & Technology

Apple welcome the proposed change to the zoning of their campus and the 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 to ‘ZO 11 Business & Technology’.

As outlined in our submission to the Draft Development Plan, we consider that this zoning better reflects both the recent permissions at the Apple Campus and wider employment objectives of the City Development Plan.

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Amendment No. 1.332 - Car Parking Standards

Amendment No. 1.332 relates to amendments to the maximum car parking standards in Table 11.13 of Draft Plan. Our submission to the Draft Development Plan provided a detailed rationale which outlined the significant decrease in the maximum car parking provision and the need to amend this in order to address the immediate need in advance of the improvements to public transport as envisioned in CMATS.

Zone 2 encompasses the following areas of the City: Ballincollig, City Suburbs and areas accessible to mass transit (existing or proposed LRT, Cork Bus Networks). The maximum car parking standards set out for Zone 2 unilaterally apply to Ballincollig and all suburbs of the City regardless of the existing public transport available to the area or the anticipated delivery of new services. We acknowledge that the Proposed Material Alterations have considered the need to increase the maximum car parking provision for 'Offices, Enterprise & Employment' from 1 space for each 300m² of gross floors area to 1 space for each 150m² for Zone 2, however this increase to the parking provision is still only a third of the current provision for this part of the City.

While there have been some improvement to the public transport available at the Apple Campus since the enactment of the 2015 Cork City Development Plan, it is not considered that the level of improvement is sufficient to justify a decrease of over 60% to the current car parking standards. The Apple Campus at Hollyhill is served by routes 202 and 202A. Service commences at 6:20am and runs to almost midnight. While the frequency of service is relatively good when making the trip from the City Centre to the Campus, staff traveling from other parts of the City must endure a much longer commute if traveling by public transport to the Campus.

A review of possible commutes from various locations in the City to the Apple Campus using Transport for Ireland's 'Plan a Journey' feature indicates that a commute from Maryborough, Douglas to the campus would take at least an hour to complete compared to a 20 minute drive. From Bishopstown (CUH) the bus commute is just shy of an hour at circa 50 minutes. The Transport for Ireland website indicates that this trip would take 9 minutes by car. And from the centre of Ballincollig to the Apple Campus is an hour to 1 hour and 20 minutes of travel time compared to an 18 minute car journey.

Apple have a robust mobility plan with full time commute manager on campus and actively encourage their staff to cycle and use both public and private bus services. However, the public infrastructure needs to be in place for this modal shift to truly take hold. A review of the frequency of bus services and the improvements being proposed are welcomed. But the commuter experience from their home to their place of employment needs to be considered in terms of improving the connectivity between bus routes, train services and in the longer term the LRT.

We consider that the reduction in the maximum car parking provision for 'Office Enterprise and Employment' will provide challenges to providing the employment envisioned in the Draft CDP for the northwest of the City. Objective 7.10 of the Draft Plan identifies Hollyhill as one the City's 'New Strategic Employment Sites' with an objective:

To provide for 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.

In order to meet this objective, we submit that there is an opportunity to make a provision within Table 11.13 of the Plan which will facilitate the employment opportunities in the northwest suburbs until the bus network is improved to provide connectivity to the wide city suburbs.

We proposed that the following non-material changes in red below are included in the City Development Plan 2022-2028.

Land Use Category	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.
Maximum Standards: 1 space for each unit of gross floor area sq m unless otherwise indicated				
Medical Clinics				
Primary Health Care Centres	1 Per Consulting Room	1 Per Consulting Room	1 Per Consulting Room	Case by Case
Employment: Including Offices, Industry Light and General				
Industry	400	300	200	
(Light and General)	200	140	100	80
Offices Enterprise & Employment	500	300	200	100
	200	150 *	100	50
Docklands				
Tivoli	These areas have different car parking standards. Please refer to Chapter 10.			
Warehouse	500	400	300	200
	450	300	200	

*** A maximum car parking provision of 1 space for each 50m² GFA will apply to the North Western Suburbs until such time as bus services, commuter hubs and dedicated bus lanes are provided to this part of the City that are operational with services established.**

This change maintains the 2015 Cork City Development Plan maximum car parking standards for this area providing stability to future investment in this designated strategic employment site.

Zoning Amendment No. 2.91 – Proposed Sustainable Residential Neighbourhoods

Zoning Amendment No. 2.91 proposes a change from the 'Light Industry and Related Uses' to 'Sustainable Residential Neighbourhoods' on lands immediately to the west of Apple's Hollymount 2 building, also on lands zoned for 'Light Industry and Related Uses'.

Keeping this site zoned as 'Light Industry and Related Uses' provides significant opportunities for continued job creation and local economic growth, given the immediate adjacency to established and expanding industrial uses. This, we believe, offers greater long-term benefits to the community.

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:

- **Zoning Amendment 2.88 – Proposed 'Business & Technology'**

The change to 'Business & Technology' zoning for both the Apple Campus and the new strategic employment lands to the north is welcomed and will facilitate future opportunities for growth.

- **Amendment No. 1.332 – 'Car Parking Standards'**

We consider that maximum car parking standards in the North Western suburbs need to consider the current commute times to Hollyhill and that reductions to the maximum car parking standards should be implemented in line with the delivery of improvements to the bus network and commute times. We submit that Table 11.13 be amended to include the additional text outlined in red.

- **Zoning Amendment No. 2.91 – Proposed 'Sustainable Residential Neighbourhoods'**

Keeping this site zoned as 'Light Industry and Related Uses' provides significant opportunities for continued job creation and local economic growth, given the immediate adjacency to established and expanding industrial uses. This, we believe, offers greater long-term benefits to the community

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 as part of the consultation process for the review of the upcoming Development Plan.

Yours sincerely



Susan R. Cullen
McCutcheon Halley