

Our ref: IE000185

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Date: 1st October 2021

Development Plan Submissions,
Strategic and Economic Development,
City Hall,
Anglesea Street,
Cork T12 T997

RE: Draft Cork City Development Plan 2022 – 2028

Submission on Behalf of Cork Airport (and Dublin Airport Authority plc)

Dear Sir / Madam,

RPS is instructed by Cork Airport, Kinsale Road, Cork to lodge this submission on its behalf in respect of the proposed Draft Cork City Development Plan 2022 – 2028. Cork Airport welcomes and supports the general content of the Draft Cork City Development Plan 2022 – 2028 insofar as it relates to Cork Airport.

However, there are a number of provisions of the Draft Plan in respect of which Cork Airport requests revisions and refinements so as to align more closely with and support the operational, safety and future development requirements of the airport. These relate to:

- Zoning objective provisions
- Safety and safeguarding issues
- Proposed Framework Plan
- Parking Policy
- Refinement of policy / objective relating to additional Airport Business Park
- Refinement of Zoning Objective ZO 22 and associated objectives
- Public transport connections
- Consultation with Cork Airport in respect of proposed Southern Distributor Link Road

We set out hereunder the detail of the requested revisions and the reasons for same. Where revisions to proposed provisions of the Draft Plan are set out below, deletions are shown by strikethrough and additions are shown underlined.

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1 Zoning Objective Provisions

Cork Airport seeks a number of revisions to the extent and nature of zoning objectives within the overall airport area. All of the proposed zoning revisions are identified on Figure 1 with a rationale for each proposed revision set out in greater detail in the following sections.

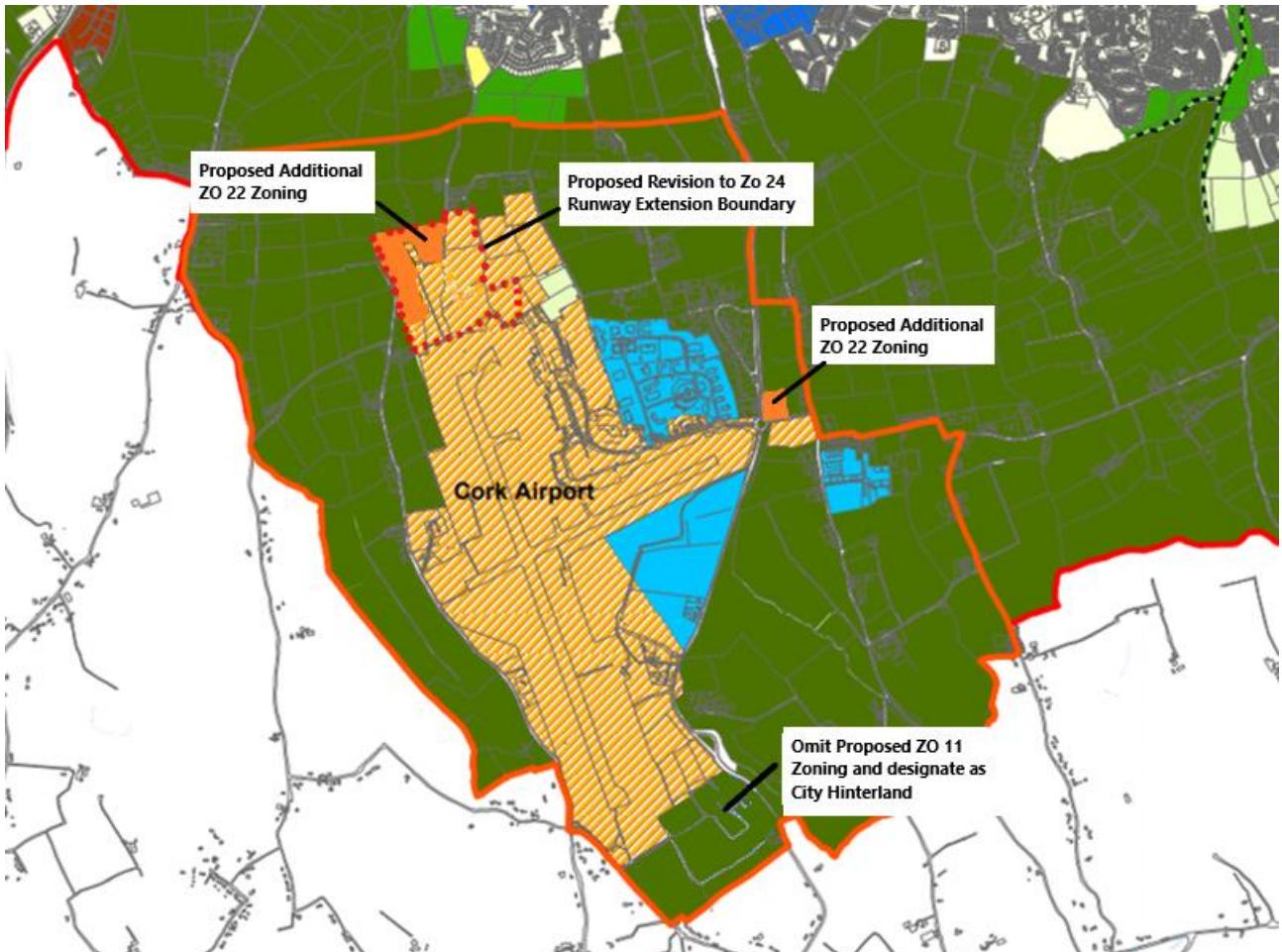


Figure 1: Proposed Zoning Revisions

1.1 Additional Area Proposed for ZO 22 Zoning and Revised ZO 24 Boundary at Northern Site of Airport

Cork Airport seeks additional ZO 22 zoning at the northern side of the airport lands for the purposes of its potential northern expansion of the existing runway, which planned upgrade is identified at paragraph 10.187 of the Draft Plan. While the current Ballincollig Carrigaline MD LAP 2017 and proposed zoning provisions in the Draft LAP do include some area to accommodate this potential runway extension, it is too confined an area. An increased area is necessary to develop reasonable design options and to confirm a preferred scheme.

It is requested that the ZO 22 zoning objective be extended into the area identified in orange on Figure 1 above. The extent of area identified for the runway extension boundary under objective ZO24 should also accordingly be revised as illustrated on Figure 2.



Figure 2: Proposed Additional ZO22 Zoning and Revised ZO 24 Boundary for Runway Extension Purposes

1.2 Additional Area Proposed for ZO 22 Zoning at Eastern Side of Airport, Kinsale Road

The second area in which additional ZO 22 zoning provision is requested is at the former 'Airport Lodge' site adjacent to the main airport N27 roundabout. It is proposed that this area be zoned ZO22 for the purposes of accommodating a relocated petrol station. The current petrol station serving the airport is inadequately sized and poorly located and there are no suitable alternative sites available within the main airport precinct to relocate it. The former Airport Lodge site located at the outer airport roundabout and with easy access from the local road network off the N27 is ideal in terms of location as it offers easy access for traffic both arriving at and departing from the airport without compromising traffic flow either within the airport lands themselves or on the N27. It is also of a sufficient size to accommodate a petrol filling station and ancillary retail facilities appropriate for an international airport.

Finally, it should be noted that the site has a history of commercial use associated with airport related activity, as it was the site of Airport Lodge guest accommodation and associated parking.

It is therefore requested that a ZO 22 zoning objective be applied to the area identified in orange on Figure 3 below.



Figure 3: Proposed Additional ZO 22 Zoning Objective Area (at former Airport Lodge lands)

1.3 Revision to Proposed Rezoned ZO 11 Lands to the South

The Draft Plan proposes to zone a number of parcels of land within the airport precinct and environs objective ZO 11 Business & Technology. These include the existing Airport Business Park, the existing Airways Technology Park to the east, a largely greenfield triangular shaped site of approx. 23.5ha in the southeast quadrant of the airport, and an approx. 17ha area at the southern end of the airport lands (greenfield with agricultural buildings). Three of these plots comprise of either existing development or are currently zoned for enterprise and more office-based development. The plot on the southern side of the airport however is currently zoned objective SE-I-01 under the Ballincollig Carrigaline MD LAP 2017 which is for the purposes of *“logistics, warehousing and distribution uses which require an airport location. Any proposals for this site will include a traffic impact assessment and mobility management plan. Development proposals will include comprehensive provision for a safe and satisfactory access to the site”*.

1.3.1 Preferred Proposal - Request to Remove Proposed ZO 11 zoning objective and Zone as City Hinterland

Cork Airport now requests that this c.17ha plot on the southern side of the airport not be rezoned for 'Business and Technology' uses as proposed in the Draft plan but that it be zoned as City Hinterland which is comparable with the greenbelt zoning it was previously zoned prior to 2017. As this plot of land is located within only 150m – 700m from the end of the airport runway, it is submitted that commercial development here would conflict with the airport activities on public safety grounds. Zoning of these lands for development other than aviation / airport related uses should be rejected on aerodrome safety grounds as follows:

1. the lands are less than 200m from the end of Runway 34 of an international airport
2. the lands are within the outer public safety zone for the airport as identified on Figure 10.32.
3. given its location proximate to the runway there is potential for any development of the site to interfere with radar and flight instrumentation, navigation aids and instrument flight procedures, create wind turbulence which might impact aircraft safety, impact EASA Obstacle Limitation Surfaces.
4. The proposed rezoning by Cork City Council suggests it is satisfied that there is no need requirement for lands in the vicinity of the airport to specifically accommodate logistics, distribution and storage type uses, for which it is currently zoned. Potential Business and Technology

development demands, for which is it now proposed to be zoned, will be adequately served in the short to medium term by the existing Cork Airport Business Park and the c.23.5 ha already zoned for 'Enterprise' (and now proposed as Business and Technology) – and which are outside of the public safety zones. As there is need for these lands to be zoned for either use it should revert to a Greenbelt designation.

Having regard to all of the foregoing, it is requested that the proposed rezoning of the 17ha site at the southern side of the airport be rejected and that it be zoned as City Hinterland as illustrated on Figure 4 and compatible with its former greenbelt designation.



Figure 4: Proposed Revision to Designate Lands at City Hinterland

1.3.2 Alternative Proposal - Request to Remove Proposed ZO 11 zoning objective and Replace it with a ZO 10 zoning objective with modifications

In the event that Cork City Council declines to zone these lands as City Hinterland, Cork Airport now requests that the c.17ha plot retain a zoning objective for the type of land uses specified under the current SE-I-01 objective of the 2017 LAP and that it should accommodate only such development which requires an airport location. The most comparable zoning objective under the current Draft City Plan is ZO 10 which is for Light Industry and related uses. The general uses permitted in this zone include light industry and manufacturing as well as warehousing, logistics, storage and distribution. The alternative proposed revision for these lands is identified on Figure 5 below.

It is respectfully submitted that warehousing, logistics, storage and distribution uses which require an airport location are more appropriate at this site than Business and Technology, for a number of reasons.

1. The lands are within the outer public safety zone for the airport as identified on Figure 10.32. In 2005 Environmental Resources Management Ireland Ltd. (ERM), was commissioned by the Department of Transport (DT) and the Department of Environment, Heritage and Local Government (DoEHLG) to investigate Public Safety Zones (PSZs) at Ireland's three principal airports; Cork, Dublin, and Shannon. Within outer public safety zones the guidelines recommend that development comprising of working environments shall be restricted to those providing for ≤ 110 persons per half hectare. The typical nature and scale of office based development types permissible within a Business and Technology zone would typically generate employment levels in excess of 110 persons per half hectare and accordingly would be in conflict with the recommendations of the ERM report.

2. Potential Business and Technology development demands at Cork Airport will be adequately served in the short to medium term by the existing Cork Airport Business Park and the c.23.5 ha already zoned for 'Enterprise' (and now proposed as Business and Technology) – and which are outside of the public safety zones.
3. An additional 17 hectares of land zoned for similar uses would be in excess of the needs for such uses within the lifetime of this Development Plan.
4. The provision of two substantial plots of land zoned for Business and Technology uses in excess of the needs during the lifetime of the plan would potentially result in fragmented and piecemeal development.
5. The c23.5ha site is the most suitable site for Business and Technology uses in the life of the current plan.
 - It is already zoned for such uses.
 - Sequentially, it is closest to the landside airport facilities and to the existing Airport Business Park and will benefit from access to established support services and amenities.
 - Development on these lands in the short and medium term will support the long-term financial viability of Cork Airport as provided for at paragraphs 10.178 and 10.179 of the Draft Plan.
6. There are no other existing zoned lands in the immediate vicinity of the airport available for Warehousing, logistics and storage and distribution uses. These lands were initially zoned for such uses under the Ballincollig Carrigaline MD LAP 2017. Previously they were unzoned. It is assumed that the reason Cork County Council zoned them in the first instance was to make provision for such uses which require an airport location, and which could not be accommodated within an enterprise / business park zone. The proposed rezoning to Business and Technology would result in a situation again in which no lands in the vicinity of the airport could accommodate such uses.
7. Business and technology uses at the 17 hectare site would have much greater loadings on service and access requirements than lower employee intensive uses such as warehousing and logistics. Access would be required from the Regional Road R600 and would require significant upgrade works. Access and service connections are already in place to the main airport lands.

In order to attach the required restrictions, it is requested that an additional paragraph be added after paragraph ZO 10.2 on Page 535 as follows:

"In the case of the ZO 10 zoned lands at Cork Airport permissible uses shall be restricted to logistics, warehousing and distribution uses which require an airport location. Any development proposals at this site will require a safe and satisfactory access to the site and a Traffic Impact Assessment and Mobility Management Plan will be provided as part of a planning application for any proposals here."



Figure 5: Proposed Revised Zoning to ZO 10 with Restrictions

2 Safety and Safeguarding Issues

2.1 Policy and objectives relating to Airport Safeguard Zone

The Draft City Development Plan includes policies and an Objective in respect of the airport safeguard zone. The draft development plan zoning maps identify the Airport Safeguard Zone. Cork Airport is in agreement with the area identified for this zone insofar as it relates to lands within the jurisdiction of Cork City Council. It is submitted that this represents the minimum geographical area within which strict land use development restrictions are required. Restrictions are required both to safeguard the future development and operational requirements of the airport and also to ensure residential development is provided in areas where suitable residential amenity can be delivered (i.e. outside of the safeguard zone).

The Draft Plan incorporates a provision that new housing will not be permitted within the Airport Safeguard Zone save in what it describes as “exceptional circumstances where consideration may be given to the development of new housing for those actively involved in farming”. While the general restriction on housing is welcomed by Cork Airport, it is considered that the ‘exceptional circumstances’ provision will potentially provide for unnecessary cases of incompatible residential development with diminished residential amenities.

2.1.1 Preferred Proposal – No New Residential Development within Safeguard Zone

The preference of Cork Airport is that no new residential development be permitted within the Safeguard Zone and the provision for housing in exceptional circumstances in this area be omitted from the Plan.

The Balanced Approach to aircraft noise management was developed by the International Civil Aviation Organisation (ICAO). It is an internationally agreed approach to managing noise at airports. A central tenet of the Balanced Approach is the application of land use planning and management measures to minimise noise concerns which includes defining zones around airports associated with different noise levels taking into account population levels and growth as well as forecasts of traffic growth and establish criteria for the appropriate use of such land, taking account of ICAO guidance.

In line with the Balanced Approach Cork Airport requests that no new residential development be permitted within the Safeguard Zone. Within the outer noise zone (falling outside of the safeguarded zone), noise sensitive development should incorporate appropriate noise attenuation measures. We accordingly request that paragraph 10.194 of the Draft Development Plan be amended as follows and that paragraph 10.195 be deleted:

“10.194 To safeguard the future operations of the Airport no new housing will not be permitted within the area delineated as Airport Safeguard Area”, save in exceptional circumstances where consideration may be given to the development of new housing for those actively involved in farming.

10.195 Site selection must ensure that the rural character of the area is maintained, multiple sites on single landholdings will not be permitted. Planning applications within this area shall be accompanied by a noise assessment report produced by a specialist in noise measurement which shall detail all proposed noise mitigation measures together with a declaration of acceptance of the applicant of the result of a noise acceptance report. Further indemnification Cork City Council and Cork Airport from any loss of amenity which may arise as a result of Airport Operations shall be agreed at Development Management Stage.”

In addition, on the basis of this rationale, we request that Objective 10.52 also be revised as follows:

“This objective is intended to safeguard the sustainable development of the Airport. All proposed developments within this area will be referred to the Irish Aviation Authority and Cork Airport by Cork City Council’s Development Management Section to seek their observations as part of the statutory planning process under Section Article 28 of the Planning and Development Regulations, 2001.

In addition, the construction of one-off housing will generally not be permitted in the Safeguard Area save for exceptional circumstances such as those actively engaged in farming. Additional requirements for the construction of dwellings in this area are set out the Cork Airport Chapter.”

2.1.2 Alternative Proposal – More Stringent ‘Exceptional Circumstance’ Criteria to be Applied

In the event that Cork City Council does not accept this proposed revision, Cork Airport requests in the alternative that the Planning Authority apply more stringent ‘exceptional circumstance’ criteria under which it may consider permitting new housing within the Safeguard Area and/ or the Noise Zones.

In this regard we note that the Planning Authority’s rationale for considering exceptional circumstances is based on a need for farmers to live within an agricultural landholding. The ‘exceptional circumstance’ criteria currently provided for in the Draft Plan where housing may be considered is when the ‘new housing is for those actively involved in farming’ and also that ‘multiple sites on single landholdings will not be permitted’. It is submitted that these criteria should at a minimum be strengthened so as to make provision for genuinely ‘exceptional’ circumstances only while otherwise restricting additional housing. The criteria should be strengthened for the following aspects:

- The criteria requiring applicants to be actively involved in farming as currently drafted could apply to people engaged only part time in farming and with a separate primary occupation. It is respectfully submitted that this is not a justifiable basis for needing to live on the farmholding. This should be altered to apply only to people occupied in full time farming and who are the owners of the farmholding, or immediate family members of the owner who have a genuine need to reside on the farmholding.
- The provision in the Draft Plan stating that ‘multiple sites on single landholding will not be permitted’, is slightly vague and should be further clarified. As the Safeguard Area contains long established farmholdings there already residential properties associated with same located within the Safeguard Area. In this regard there should be very limited need for additional residential development to serve the agricultural lands. In this regard it is submitted that this criterion should be clarified that no more than two residential properties, including the original farmhouse, will be considered on a single farmholding. Occupancy clauses should be attached to permissions.
- A further criterion should be added that permission may only be considered within the Safeguard Zone if the majority of the farmholding falls within the Safeguard Zone and if there are no suitable sites available elsewhere in the farmholding outside of the Safeguard Zone. This is a reasonable provision which would accommodate an exceptional circumstance while also maximising protection for the Safeguard Zones.

In the event that the Planning Authority do not accept the full prohibition on housing within the Safeguard Zone we request that paragraphs 10.194 and 10.195 be revised as follows:

“To safeguard the future operations of the Airport new housing will not be permitted within the area delineated as Airport Safeguard Area, save in exceptional circumstances where consideration may be given to the development of new housing for those who are owners of (or immediate family members of owners) and actively engaged in full-time involved in farming within the Airport Safeguard Area, where the majority of the farmholding falls within this zone and where no suitable sites are available within the farmholding for the development of a house outside this zone.

Site selection must ensure that the rural character of the area is maintained, multiple sites a maximum of two dwellings (including any existing dwellings) only can be considered on single landholdings. will not be permitted. Planning applications within this area shall be accompanied by a noise assessment report produced by a specialist in noise measurement which shall detail all proposed noise mitigation measures together with a declaration of acceptance of the applicant of the result of a noise acceptance report. Further indemnification Cork City Council and Cork Airport from any loss of amenity which may arise as a result of Airport Operations shall be agreed at Development Management Stage.”

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In addition, for this proposed alternative revision to paragraphs 10.194 and 10.195, we request the following associated revision to Objective 10.52:

"This objective is intended to safeguard the sustainable development of the Airport. All proposed developments within this area will be referred to the Irish Aviation Authority and Cork Airport by Cork City Council's Development Management Section to seek their observations as part of the statutory planning process under Section Article 28 of the Planning and Development Regulations, 2001.

In addition, the construction of one-off housing will generally not be permitted save for exceptional circumstances such as for those who are owners of (or immediate family members of owners) and actively engaged in full-time farming within the Airport Safety Zone, where the majority of the farmholding falls within these zones and where no suitable sites are available within the farmholding for the development of a house outside this zone. Additional requirements for the construction of dwellings in this area under these exceptional circumstances are set out in paragraph 10.195 the Cork Airport Chapter."

2.2 Policy in relation the Noise Zones

Section 10.193 of the Draft City Development Plan contains policy in respect of airport noise and notes that there are three noise zones associated with aircraft operations. The extent of these areas is identified on Figure 10.32.

While section 10.193 and Figure 10.32 acknowledge these noise zones they do not include provisions for relevant development controls to be applied within the noise zones. The inner zones fall fully within the Safeguard Area and accordingly the protections applied under paragraphs 10.194 and 10.195 apply. Parts of the outer noise zone however extend beyond the Safeguard Area and accordingly it is appropriate to clarify policy for this area.

Accordingly, Cork Airport requests that paragraph 10.193 be amended by the addition of the following text at the end of the current proposed paragraph:

"Development within Noise Zones A and B will be controlled by the general Safeguard Zone provisions set out in paragraphs 10.194 and 10.195 below. Any proposed new noise sensitive development (e.g. housing, schools, hospitals etc) within Noise Zone C (the outer zone) shall incorporate appropriate noise attenuation measures."

2.3 Policy provision in respect of Public Safety Zones

Paragraphs 10.197 and 10.198 refer to the airport's two Public Safety Zones – inner and outer – and advise that planning applications in the vicinity of these zones will be referred to the Irish Aviation Authority (IAA) by Cork City Council's Development Management Section to seek their observations as part of the statutory planning process. The provision of this policy is welcomed, though it is requested that the observations of Cork Airport also be sought in such cases, so as to acknowledge its role as an airport operator and its statutory function under the planning regulations.

2.4 Policy Provision in respect of Obstacle Limitation Surfaces

Figure 10.32 identifies Obstacle Limitation Surfaces, but the Plan does not include an explanation in respect of same.

The Obstacle Limitation Surfaces (OLS) are conceptual surfaces associated with a runway system, which identify the lower limits of the aerodrome airspace above which objects become obstacles to aircraft operations. It is critical in the interest of safe operations of aircraft, that the OLS is maintained free of obstacles. The dimensions and slopes of the OLS are defined by the International Civil Aviation Organisation [ICAO] and are supported by the European Aviation Safety Agency [EASA]. They are a critical safety tool from an obstacle perspective, guaranteeing a minimum clear altitude above all obstacles within a certain airspace. From a land development perspective, the OLS provides clear direction to developers and planning authorities about maximum heights of structures (including buildings, towers, cranes), ensuring due regard to airport safeguarding when it comes to planning for new development in the vicinity of airports.

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In the interest of ensuring that these surfaces are maintained, structures which approach close to or exceed maximum heights as identified on the appended OLS sheet (Appendix 1), must be reported to the Irish Aviation Authority and Cork Airport to allow for further detailed technical assessment. The detail presented on the sheet is difficult to read at the scale shown in Appendix 1 so a separate pdf of this Appendix is also attached to this submission.

We respectfully request the following policy to be included within the Final Plan.

Additional Policy Provision after paragraph 10.198:

"Obstacle Limitation Surfaces

10.199

The Planning Authority supports the safe and effective operation of Cork Airport, and shall have regard to the Obstacle Limitation Surfaces in determining any development proposals in terms of the safety of aircraft and the safe and efficient navigation thereof. The planning authority shall take account of the advice of the Irish Aviation Authority and Cork Airport with regard to the effects of any development proposal on aircraft safety."

2.5 Clarify Designations Presented on Figure 10.32

Figure 10.32 graphically illustrates a number of different safety zone provisions in the vicinity of the airport. Due to number of different designations presented and the overlain nature of a number of these it is will be difficult for members of the public to understand. It is suggested that the information presented currently on a single map in Figure 10.32 be provided on two maps.

One map should contain details of:

- Approach Surfaces
- Take Off surface
- Inner Horizontal
- Conical Surface
- Outer Horizontal

A second map should contain detail on:

- Public Safety Zones
- Noise Zones

2.6 Additional Provision for Protections in the Vicinity of the Airport

A further safety concern of Cork Airport relates to any new developments in the vicinity of the airport which may promote areas of increased and focussed bird activity. In this regard open water bodies or wetland habitats in particular can increase bird activity in an area. Accordingly, it is requested that no new wetland SuDS provisions or open attenuation or other ponds that may attract increased bird activity should be permitted within the Safeguard Zone.

Paragraph 5.40 of the Draft Plan acknowledges this issue and potential safety issues on foot of 'large attenuation ponds'. It is requested however, that paragraph 5.40 be revised slightly to acknowledge other wetland areas that may give rise to this safety concern. The proposed revision is as follows:

"SuDS strategies will not be uniform and will differ from site to site owing to site characteristics, location and existing constraints, such as contamination risk. In addition, some NBS solutions may not be appropriate in some cases due to the risk of transporting contamination. Care is also needed to avoid a concentration of large attenuation ponds in the vicinity of Cork Airport to reduce the risk of flocks of birds congregating. Careful consideration should be given to all SuDS proposals in the vicinity of Cork Airport, such as open water storage, which has potential to act as a bird attractant, and create bird hazard for aircraft."

3 Proposed Framework Plan for the future development of the Airport

Objective 10.51 relates to Strategic Development of Cork Airport. It states as follows:

“During the lifetime of the Plan, Cork City Council in co-operation with Dublin Airport Authority and in consultation with other relevant stakeholders including Transport Infrastructure Ireland, National Transport Authority and Cork County Council will prepare a framework plan to allow for the co-ordinated and sustainable growth of the Airport to underpin its function as an economic driver for the Southern Region.

The relevant area for a new framework plan which will be prepared and adopted during the lifetime of this plan is delineated in Volume 2 Mapped Objectives. The Framework Plan will provide for a coherent and coordinated land use plan for the Airport and its immediate environs.”

We request that the objective be refined slightly to reflect the significant level of input which will be necessary from Cork Airport in identifying its future development needs and strategic layout provisions for the airport. We submit that this Objective should also acknowledge the need for the Framework Plan to be flexible and adaptive to accommodate potential unforeseen airport operational requirements. This recognises the constantly changing regulatory environment, evolving safety and security needs as well as the changing need of our airlines operators and passengers.

The proposed revised Objective 10.51 is as follows:

“During the lifetime of the Plan, Cork City Council in co-operation collaboration with Dublin Airport Authority Cork Airport and in consultation with other relevant stakeholders including Transport Infrastructure Ireland, National Transport Authority and Cork County Council will prepare a framework plan to allow for the co-ordinated and sustainable growth of the Airport to underpin its function as an economic driver for the Southern Region.

The relevant area for a new framework plan which will be prepared and adopted during the lifetime of this plan is delineated in Volume 2 Mapped Objectives. The Framework Plan will provide for a coherent and coordinated land use plan for the Airport and its immediate environs while maintaining flexibility to accommodate unforeseen emerging needs in the future.

4 Parking Policy

Paragraph 10.190 of the Draft Plan discusses car parking provision at the airport. It states that there is currently adequate capacity for both passenger and staff parking to cater for current demand and for the medium term future. While it is correct that there is sufficient parking for current demand, it is unlikely that it will be sufficient for the medium term.

Passenger throughput at the airport has obviously been affected in recent times by the Coronavirus pandemic. Prior to that however, parking demand at the airport was nearing capacity such that additional parking would have been required in the short term. Currently, it is expected that the airport will return to and exceed 2019 throughput within the lifetime of the proposed City Development Plan, such that additional parking provision may be required within this Plan period. We accordingly request that paragraph 10.190 be revised to reflect this situation as follows:

“The Airport is served by several car parks within walking distance of the terminal and there is currently adequate capacity for both passenger and staff parking to cater for current demand and for the medium short term future. Additional parking requirements for the medium term shall be set out and provided for in the proposed Framework Plan”.

As the quantum and location of future car parking provision will be guided by the overall future growth projections and operational and development plans for the airport, it is reasonable that Cork Airport identify car parking demand and suitable locations to Cork City Council for discussion and agreement prior to inclusion in the Framework Plan.

Accordingly, we request that paragraph 10.192 which also relates to parking policy be revised as follows:

10.192

"Notwithstanding modal shift targets it is recognised that additional lands will be necessary to accommodate the parking requirements generated by increased passenger numbers in the longer term. Additional lands may be identified to allow for car park expansion, and these will be safeguarded in the new framework plan. The scale and location of such lands will be identified in collaboration with Cork Airport having regard to its medium to long term future growth plans and operational and development requirements."

5 Refinement of Policy / Objectives relating to additional Airport Business Park

Objective 10.49 of the Draft City Plan relates to the development of an additional Airport Business Park. It states as follows:

"Allow for Office based industry or tourism related projects requiring an Airport location, internationally traded services, corporate offices and uses that are complimentary to those in the existing Airport business park. All such proposals shall be accompanied by Traffic and Mobility management plans."

It is submitted that the provision within this Objective that office based industry or tourism related projects should 'require' an airport location is unnecessarily restrictive. Paragraphs 10.178 and 10.179 acknowledge the fact that alternative land uses are required to provide an alternative income stream for airport operations than the traditional income streams which supported airport operations in the past. In this regard it is not considered necessary or appropriate to restrict office based industry or tourism related projects to those which 'require' an airport location. Rather, it would be more appropriate to restrict them to those which are compatible with and which would benefit from an airport location. We accordingly request that the wording of this objective be revised slightly to the following:

"Allow for Office based industry or tourism related projects requiring which would benefit from an Airport location, internationally traded services, corporate offices and uses that are complimentary complementary to those in the existing Airport business park. All such proposals shall be accompanied by Traffic and Mobility management plans."

6 Refinement of Zoning Objective ZO 22 and associated Objective in respect of Airport Infrastructure

Objective 10.50 relates to 'Airport Infrastructure' and states as follows:

"To promote and support the operations of Cork International Airport subject to normal planning considerations in relation to:

- General aviation activity
- Air transport infrastructure including but not limited to the expansion of the main terminal to include:
 - additional and enhanced security facilities,
 - construction of additional gates,
 - expansion of Airside Retail concession and leisure facilities, and a limited expansion of landside concession facilities
- Future expansion of runway and apron including the runway end safety area and other infrastructure associated with operations of the runway
- Refurbishment and reuse of former terminal for airport-related commercial uses
- Expansion of airport hotel
- Expansion of long-term parking facilities and limited expansion of staff parking
- Construction of bus / coach terminal
- Expansion of taxi facilities

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- *Defined car hire location*
- *Petrol Filling Station in an appropriate location if relocated and ancillary retail.*

This list is not exhaustive, and consideration may be given to items not listed.”

This policy is closely aligned with zoning objective ZO 22 and paragraph ZO22.2 which sets out the land uses which are generally applicable within the ZO22 zone. Paragraph ZO22.2 states as follows:

“Such uses include but are not restricted to: general aviation activity; air transport infrastructure including but not limited to the expansion of the main terminal including additional and enhanced security facilities, additional gates, expansion of airside retail concession and leisure facilities, and limited expansion of landside concession facilities; future extension and expansion of runways and aprons including but not limited to the Runway End Safety Area and other infrastructure associated with operations of the runway; refurbishment and re-use of former terminal for Airport related commercial uses; expansion of Airport Hotel; expansion of long-term parking facilities and limited expansion of staff parking facilities; construction of bus / coach terminal; expansion of taxi facilities; defined car hire location; petrol filling station in an appropriate location, if relocated, and ancillary retail. This list is not intended to be exhaustive and the other developments not listed will be considered, subject to normal planning and environmental considerations.”

The wording presented in Objective 10.50 and in paragraph ZO22.2 is considered to reflect specific development proposals or projects within the airport zone rather than a range of possible general activity or use types. Further, while most of the projects identified will form part of future development proposals for the airport some are not fully entirely accurate. For instance, it is not proposed to refurbish the former terminal; rather, as noted elsewhere in the Draft Plan (para. 10.186), the former terminal building is not suitable for modern aviation needs and it is proposed to demolish it.

It is considered appropriate that Objective 10.50 and paragraph ZO22.2 should both be more general in their descriptions of appropriate uses and activities. The Framework Plan to be prepared on foot of Objective 10.51 will be the appropriate stage at which to identify the more specific future development proposals for the airport.

It is therefore proposed that the list of use / activity types presented in Objective 10.50 and paragraph ZO22.2 be changed to the following general uses and activities which are necessary for modern airport operations:

- Air Transport Infrastructure supporting airport related activity/uses
- Passenger terminal building and piers
- Cargo, logistics and associated infrastructure
- Aerodrome/Airfield Infrastructure including runways, taxiways, apron and aircraft stands
- Air Traffic Control tower and associated development
- General Aviation
- Retail, Restaurant, Café and catering services
- Ancillary Office use
- Utility Installations
- Fire station, fire search and rescue and training facilities
- Aircraft Hangar, vehicle and aircraft maintenance, repair and overhaul (MRO) and storage facilities
- Surface access infrastructure, including, car parks, taxi holding areas, coach parking, car hire facilities and public transport provisions
- Airport hotel development
- Energy centre, fuel farm, auto-generating renewable energy development
- Petrol station
- Water storage and utilities provision
- Met Éireann facilities

The provision that this list is not exhaustive should be retained in both Objective 10.50 and paragraph ZO22.2.

7 Public Transport Connections

7.1 Linking the Airport to an Integrated Public Transport System

The Draft Development Plan contains general policy to achieve an integrated transport system and to increase the modal share of journeys being undertaken by more sustainable transport modes than private vehicle. Despite this general policy provision however, it is considered that specific objectives for sustainable travel options serving the airport are limited. Specific proposals within the draft Plan which will increase sustainable travel options to the airport comprise of a BusConnects corridor route from 'Cork Airport to City Centre via Turners Cross' (Core Bus Corridor (CBS) Route No. 9) and a primary cycle route between the City centre and the airport. It is submitted that a number of public transport objectives set out in the Draft Plan should be revised to enhance connectivity between the airport and the wider public transport network.

The main revision sought is to ensure that the Core Bus Corridor serving the airport links to Kent Station and does not terminate elsewhere in the city centre. By providing this link to Kent station this will allow easy transfer of passengers with luggage from suburban and intercity rail, directly to a bus to the airport. It is noted that a connection to Kent Station will also ensure integration in the long term with the proposed Light Rail route which will connect to the eastern and western extents of the city at Mahon and Ballincollig.

It is therefore requested that the proposed route CBC 9 be amended in Table 4.5 to:

'Cork Airport to Kent Station via City Centre via and Turners Cross'

It is also requested that route shown on Figure 4.4 be amended to reflect this proposed change.

This proposed revision is in line with the objective set out in the Cork Metropolitan Area Transport Strategy 2040 (CMATS) for a radial bus route from Cork Airport to Kent Station.

The second revision sought is to include a specific objective to maximise strategic interchange between orbital routes and radial bus routes. Figure 4.5 of the Draft Plan illustrates an orbital bus route and is labelled 'Key Stops'. It is requested that key interchange stop locations between the orbital route and the radial CBCs be identified on Figure 4.5. In particular, it is submitted that the identification of a key stop interchange between the orbital route and the Airport CBC will increase opportunities for encouraging sustainable travel to and from the airport.

7.2 Modal Shift Targets for Travel to and From Cork Airport

Paragraph 10.191 of the Draft Plan states that,

"In conjunction with public transport improvements, it considered that enhanced modal shift targets aimed at reducing the number of private car journeys to the airport be provided for in the new framework plan for the Airport. Cork City Council will work Dublin Airport Authority and the National Transport Authority to successfully achieve these targets."

Cork Airport supports the principle of enhancing opportunities for modal shift from private car to more sustainable forms of transport, and indeed has put forth a number of proposals above for revising the Draft Plan policy to enhance support to connect the airport to a wider integrated public transport network.

Notwithstanding this support, it is respectfully submitted that any modal shift targets to be provided for in the new Framework Plan for the Airport must be cognisant of the nature of journeys to and from the airport, the distinct early, midday and late evening peaks at an airport as opposed to the traditional am and pm peaks, the dispersed origin and destinations and arrival / departure times of airport travellers in addition to the availability and connection of acceptable public transport services to and from these locations.

As noted above, the Draft Plan contains a single objective for public transport improvement to the airport. This currently comprises of a Core Bus Corridor to the city centre and depending on the nature, level and timing of integration with other public transport services it achieves, its ability to provide a realistic and viable alternative to private vehicle may be restricted given the unique needs, trip types and characteristics of an airport.

We request that paragraph 10.191 be revised as follows:

"In conjunction with public transport improvements, it considered that enhanced modal shift targets aimed at reducing the number of private car journeys to the airport be provided for in the new framework plan for the Airport. Cork City Council will work Dublin Airport Authority with Cork Airport and the National Transport Authority to successfully achieve these targets. Modal shift targets will be aligned to the unique nature and needs of an airport, with the level and timing of public transport improvements and with the proportion and nature of airport journeys that could practically avail of these services".

8 Direct Consultation with Cork Airport in respect of the Proposed Southern Distributor Link Road

Chapter 4 of the Draft Plan identifies the planning Southern Distributor Link Road, which is a proposed new road link between the N27 and Sarsfield Road with the potential to also link to the N71 via Lehenaghmore and Spur Hill and could also provide enhanced connectivity to Cork Airport with a potential secondary access point.

Paragraph 4.129 provides as follows in relation to the Southern Distributor Link Road:

"At time of writing this Draft City Development Plan, consultants have been appointed by Cork City Council to appraise and design the new road and a number of route options are emerging. These will be considered at next stages of preparation of the Development Plan."

Cork Airport is aware of this project and has to date been consulted by the consultants preparing the options. Furthermore, Cork Airport will make observations if and as appropriate during the public consultation period for this project.

However, given the timing of the design development for the road and the timing of the next stage of the Development Plan preparation it is requested that Cork City Council consult directly with Cork Airport in relation to the SDLR proposals before any detail on same is included in the next stage of the Development Plan.

9 CONCLUSION

Cork Airport welcomes and supports the general provisions of the Draft Cork City Development Plan insofar as it relates to operations and development of the airport. A number of revisions however, are proposed in relation to policy, zoning and other objectives presented in the plan. The revisions are sought in order to accommodate potential future aviation and airport related upgrade and improvement works; to promote logical and orderly commercial development in the wider airport vicinity; to safeguard surrounding areas in the interest of public safety and to avoid conflict with residential amenities; to promote increased modal split for public transport; and to ensure ongoing collaboration between the Planning Authority and Cork Airport in respect of its operations and strategic future development.

The revisions which are sought have been carefully considered by Cork Airport. They are requested in good faith so that the new City Development Plan will provide suitable policy support and protections for core airport operations and development requirements of Cork International Airport. Cork Airport is the primary airport of entry into the Southern Region and its smooth operation with ongoing investment and enhancements are of vital importance to the economic functioning and well being of the Region. A study undertaken by Inter Vistas Consulting Ltd. in 2019 on the economic impacts of the airport (Cork Airport Economic Impact Study Update 2019) estimated that the combined economic impacts of the airport are linked to €903m of GDP and 10,740 jobs. These impacts are direct (at airport and airport related businesses), indirect (supplying and supporting businesses), induced (employees spending economy) and catalytic (air service facilitating trade, tourism, investment growth and productivity growth).

The importance of Cork Airport to the economic, social and cultural well-being of the Region has never been more important than it is for the post Covid pandemic recovery period will are now entering. The revisions

Our Ref. IE000185

proposed within this submission are all based on a primary objective to ensure Cork Airport continues to operate smoothly and flourish as a main international travel hub for the region.

Appendix 2 presents a summary of the exact revisions and / or additions proposed.

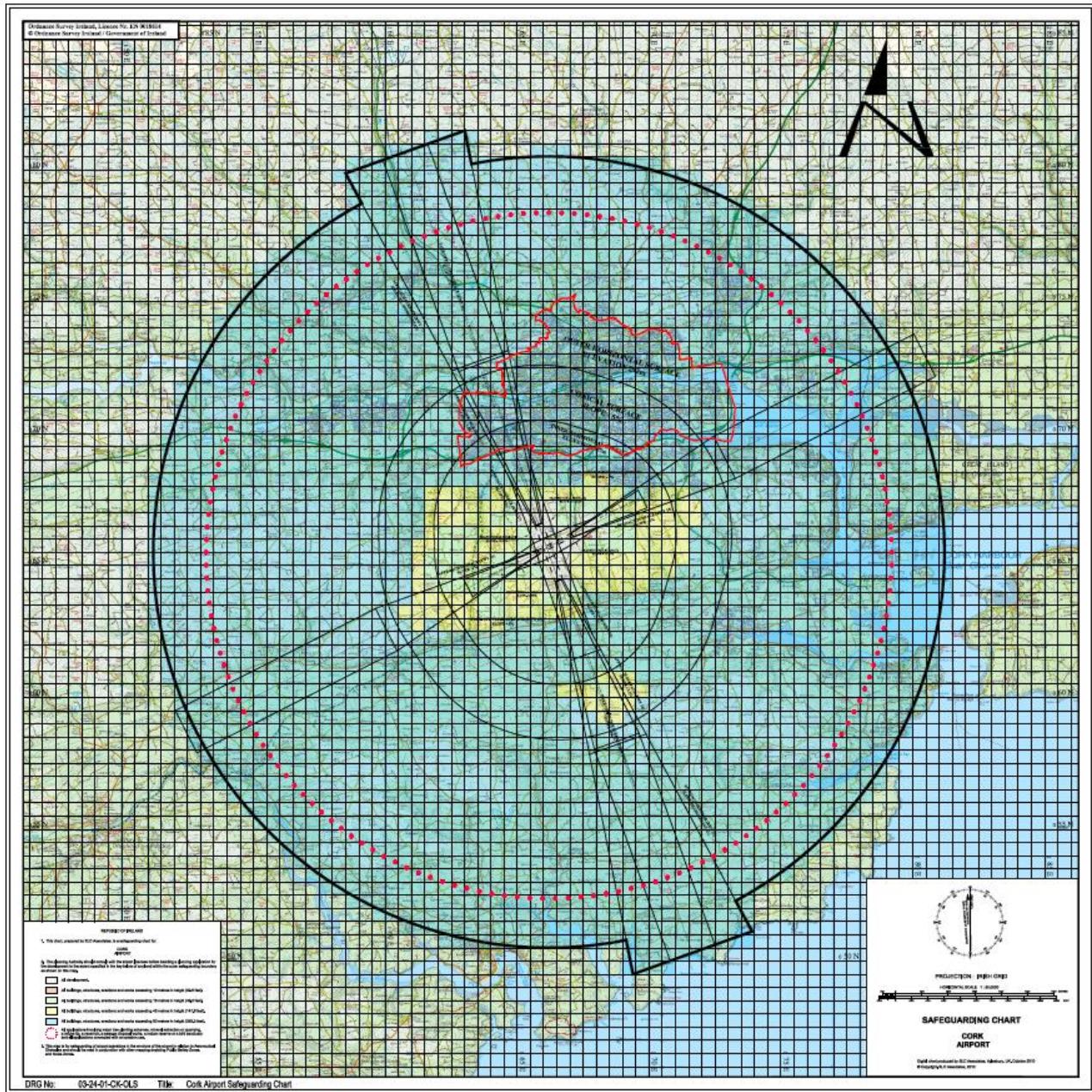
We trust that Cork City Council will give due consideration to the matters raised herein.

Yours faithfully,
for RPS Group Limited



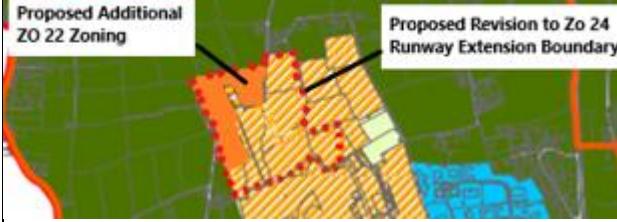
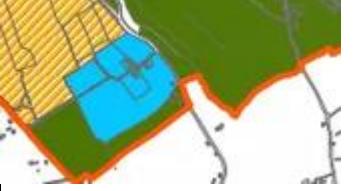
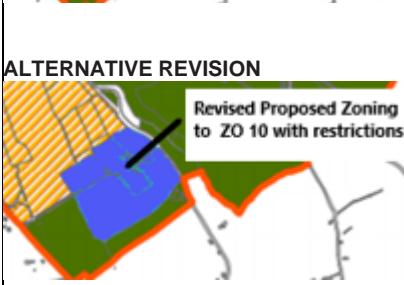
Maria Lombard
Director - Planning & Environment
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APPENDIX 1: MAXIMUM HEIGHTS FOR OBSTACLE LIMITATION SURFACES



Note: See attached pdf for clarity on detail shown

APPENDIX 2: SUMMARY OF PROPOSED REVISION TO DRAFT CORK CITY DEVELOPMENT PLAN

Draft Development Plan Reference	Existing Provision of Draft Cork City Development Plan	Proposed Revised Provision	Reasons for Change
Volume 2 Zoning and Development Objectives Map 15		<p>Existing Proposed ZO 22 zoning and ZO 24 boundary at northern extent of Airport</p>  <p>Proposed Additional ZO 22 Zoning Proposed Revision to ZO 24 Runway Extension Boundary</p> <p>Provide additional area of ZO 22 Zoning & Revised ZO24 Runway Extension Boundary</p>	To facilitate northern runway extension
Volume 2 Zoning and Development Objectives Map 15		<p>Existing Proposed ZO22 Zoning at eastern side of airport adjacent to main airport roundabout (N27 roundabout) (Former Airport Lodge Site)</p>  <p>Proposed Additional ZO 22 Zoning</p> <p>Provide additional area of ZO 22 Zoning adjacent to N27 Airport roundabout</p>	To facilitate replacement / relocated petrol filling station of suitable scale and at suitable location
Volume 2 Zoning and Development Objectives Map 15		<p>Existing Proposed ZO 11 Zoning at southern extent of Airport</p> <p>PREFERRED REVISION</p>  <p>Omit Proposed ZO 11 Zoning and designate as City Hinterland</p> <p>Remove proposed ZO 11 zoning and zone instead as ZO 21 City Hinterland</p> <p>ALTERNATIVE REVISION</p>  <p>Revised Proposed Zoning to ZO 10 with restrictions</p> <p>Revise zoning to ZO 10 with restrictions</p>	<p>PREFERRED REVISION</p> <p>Zoning these lands for development other than aviation / airport related uses should be rejected on aerodrome safety grounds.</p> <p>ALTERNATIVE REVISION</p> <p>The Science and technology uses would generate employment levels in excess of levels recommended in the ERM report on Public Safety Zones (PSZs) at Ireland's three principal airports. Airport area adequately served by other Science and Technology zoned lands more suitably located. Removal of Science and Technology zoning from these excess lands will provide for logical and sequential development of Business and Technology within the airport precinct. To maintain lands in the vicinity of the airport that can accommodate logistics, storage, distribution uses that require an airport location – if deemed necessary.</p>

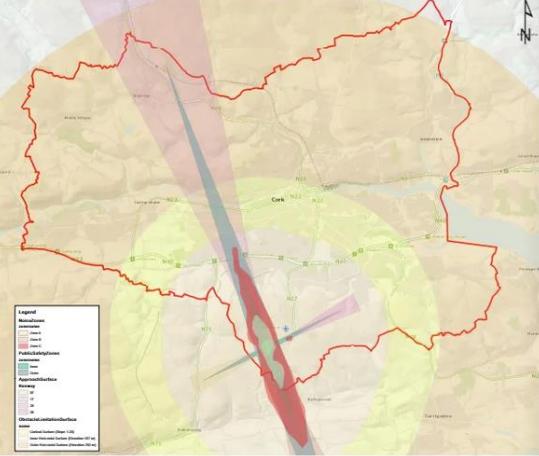
APPENDIX 2: SUMMARY OF PROPOSED REVISION TO DRAFTCORK CITY DEVELOPMENT PLAN

Draft Development Plan Reference	Existing Provision of Draft Cork City Development Plan	Proposed Revised Provision	Reasons for Change
Volume 1 Paragraphs 10.194 and 10.195 – Page 381	<p>"10.194 To safeguard the future operations of the Airport no new housing will not be permitted within the area delineated as Airport Safeguard Area"</p> <p>10.195 Site selection must ensure that the rural character of the area is maintained, multiple sites on single landholdings will not be permitted. Planning applications within this area shall be accompanied by a noise assessment report produced by a specialist in noise measurement which shall detail all proposed noise mitigation measures together with a declaration of acceptance of the applicant of the result of a noise acceptance report. Further indemnification Cork City Council and Cork Airport from any loss of amenity which may arise as a result of Airport Operations shall be agreed at Development Management Stage."</p>	<p>PREFERRED REVISION – Revise Para. 10.194 and Omit Para. 10.195</p> <p>"10.194 To safeguard the future operations of the Airport no new housing will be permitted within the area delineated as Airport Safeguard Area".</p> <p>ALTERNATIVE REVISION – Revise Para 10.194 and 10.195</p> <p>"10.194 To safeguard the future operations of the Airport new housing will not be permitted within the area delineated as Airport Safeguard Area, save in exceptional circumstances where consideration may be given to the development of new housing for those who are owners of (or immediate family members of owners) and actively engaged in full-time farming within the Airport Safeguard Area, where the majority of the farmholding falls within this zone and where no suitable sites are available within the farmholding for the development of a house outside this zone.</p> <p>10.195 Site selection must ensure that the rural character of the area is maintained, a maximum of two dwellings (including any existing dwellings) only can be considered on single landholdings. Planning applications within this area shall be accompanied by a noise assessment report produced by a specialist in noise measurement which shall detail all proposed noise mitigation measures together with a declaration of acceptance of the applicant of the result of a noise acceptance report. Further indemnification Cork City Council and Cork Airport from any loss of amenity which may arise as a result of Airport Operations shall be agreed at Development Management Stage."</p>	<p>PREFERRED REVISION</p> <p>To prohibit any new residential development within the Safeguard Area as they are incompatible on safety and / or residential amenity grounds.</p> <p>ALTERNATIVE REVISION</p> <p>To provide for strengthened 'exceptional circumstance' criteria to ensure only absolutely necessary housing is provided within this zone and where there are no viable alternatives.</p>
Volume 1 Objective 10.52 Page 384	<p>"This objective is intended to safeguard the sustainable development of the Airport. All proposed developments within this area will be referred to the Irish Aviation Authority by Cork City Council's Development Management Section to seek their observations as part of the statutory planning process under Section 28 of the Planning and Development Regulations, 2001.</p> <p>In addition, the construction of one-off housing will generally not be permitted save for exceptional circumstances such as those actively engaged in farming. Additional requirements for the construction of dwellings in this area are set out the Cork Airport Chapter."</p>	<p>PREFERRED REVISION</p> <p><i>This objective is intended to safeguard the sustainable development of the Airport. All proposed developments within this area will be referred to the Irish Aviation Authority and Cork Airport by Cork City Council's Development Management Section to seek their observations as part of the statutory planning process under Article 28 of the Planning and Development Regulations, 2001.</i></p> <p><i>In addition, the construction of one-off housing will not be permitted in the Safeguard Area."</i></p>	<p>PREFERRED REVISION</p> <p>To prohibit any new residential development within the Safeguard Area as they are incompatible on safety and / or residential amenity grounds.</p>

APPENDIX 2: SUMMARY OF PROPOSED REVISION TO DRAFTCORK CITY DEVELOPMENT PLAN

Draft Development Plan Reference	Existing Provision of Draft Cork City Development Plan	Proposed Revised Provision	Reasons for Change
Volume 1 Objective 10.52 Page 384 (cont)		<p>ALTERNATIVE REVISION</p> <p><i>"This objective is intended to safeguard the sustainable development of the Airport. All proposed developments within this area will be referred to the Irish Aviation Authority and Cork Airport by Cork City Council's Development Management Section to seek their observations as part of the statutory planning process under Article 28 of the Planning and Development Regulations, 2001.</i></p> <p><i>In addition, the construction of one-off housing will generally not be permitted save for exceptional circumstances for those who are owners of (or immediate family members of owners) and actively engaged in full-time farming within the Airport Safety Zone, where the majority of the farmholding falls within these zones and where no suitable sites are available within the farmholding for the development of a house outside this zone. Additional requirements for the construction of dwellings in this area under these exceptional circumstances are set out in paragraph 10.195,"</i></p>	<p>ALTERNATIVE REVISION</p> <p>To provide for strengthened 'exceptional circumstance' criteria to ensure only absolutely necessary housing is provided within this zone and where there are no viable alternatives.</p>
Volume 1 Paragraph 10.193 – Page 381	<p><i>"Cork Airport has at present three noise contours associated with aircraft operations, namely 57db (outer zone).66dB (inner zone) and 72dB (inner, inner zone) These existing noise contours for the airport are indicated on the following map. The noise environment and contours around the airport are likely to change because of future growth and development. Increased operations, changes in aircraft type and mix, changes in the associated operations such as maintenance and construction activity during implementation of developments will all contribute to increased noise."</i></p>	<p><i>"Cork Airport has at present three noise contours associated with aircraft operations, namely 57db (outer zone).66dB (inner zone) and 72dB (inner, inner zone) These existing noise contours for the airport are indicated on the following map. The noise environment and contours around the airport are likely to change because of future growth and development. Increased operations, changes in aircraft type and mix, changes in the associated operations such as maintenance and construction activity during implementation of developments will all contribute to increased noise.</i></p> <p><i>Development within Noise Zones A and B will be controlled by the general Safeguard Zone provisions set out in paragraphs 10.194 and 10.195 below. Any proposed new noise sensitive development (e.g. housing, schools, hospitals etc) within Noise Zone C (the outer zone) shall incorporate appropriate noise attenuation measures."</i></p>	<p>To include provisions in the Development Plan for relevant development controls to be applied within the airport noise zones. The inner zones fall fully within the Safeguard Area and accordingly the protections applied under paragraphs 10.194 and 10.195 apply. Parts of the outer noise zone however extend beyond the Safeguard Area and accordingly it is appropriate to clarify policy for this area.</p>
Volume 1 Paragraph 10.198 – Page 382	<p><i>"Planning applications in the vicinity of these zones will be referred to the Irish Aviation Authority (IAA) by Cork City Council's Development Management Section to seek their observations as part of the statutory planning process under Section 28 of the Planning and Development Regulations, 2001. Cork City Council will adhere to the advice of the Irish Aviation Authority regarding the effects of proposed development on the safety of aircraft and the safe and efficient navigation thereof."</i></p>	<p><i>Planning applications in the vicinity of these zones will be referred to the Irish Aviation Authority (IAA) and Cork Airport by Cork City Council's Development Management Section to seek their observations as part of the statutory planning process under Article 28 of the Planning and Development Regulations, 2001. Cork City Council will adhere to the advice of the Irish Aviation Authority regarding the effects of proposed development on the safety of aircraft and the safe and efficient navigation thereof.</i></p>	<p>To seek observations from Cork Airport for proposed development within Public Safety Zones.</p>

APPENDIX 2: SUMMARY OF PROPOSED REVISION TO DRAFTCORK CITY DEVELOPMENT PLAN

Draft Development Plan Reference	Existing Provision of Draft Cork City Development Plan	Proposed Revised Provision	Reasons for Change
Volume 1 After Paragraph 10.198 – Page 382		<p>“Obstacle Limitation Surfaces</p> <p>10.199</p> <p><i>The Planning Authority supports the safe and effective operation of Cork Airport, and shall have regard to the Obstacle Limitation Surfaces in determining any development proposals in terms of the safety of aircraft and the safe and efficient navigation thereof. The planning authority shall take account of the advice of the Irish Aviation Authority and Cork Airport with regard to the effects of any development proposal on aircraft safety.”</i></p>	To provide appropriate policy to explain Obstacle Limitation Surface Areas and to provide for referrals to Cork Airport.
Volume 1 Figure 10.32 – Page 382	 <p>Existing Figure 10.32 contains information on Noise Zones, Public Safety Zones, Approach Safety Runway and Obstacle Limitation Surface</p>	<p>This information should be presented on two maps:</p> <p>One Map to illustrate Approach Surfaces</p> <p>Second Map to illustrate Public Safety Zones and Noise Zones</p>	Information will be more legible and easier for public to understand various designations.
Volume 1 Paragraph 5.40 – Page 151	<p><i>“SuDS strategies will not be uniform and will differ from site to site owing to site characteristics, location and existing constraints, such as contamination risk. In addition, some NBS solutions may not be appropriate in some cases due to the risk of transporting contamination. Care is also needed to avoid a concentration of large attenuation ponds in the vicinity of Cork Airport to reduce the risk of flocks of birds congregating.”</i></p>	<p><i>“SuDS strategies will not be uniform and will differ from site to site owing to site characteristics, location and existing constraints, such as contamination risk. In addition, some NBS solutions may not be appropriate in some cases due to the risk of transporting contamination. Careful consideration should be given to all SuDS proposals in the vicinity of Cork Airport, such as open water storage, which has potential to act as a bird attractant, and create bird hazard for aircraft.”</i></p>	To clarify and restrict all incompatible water bodies / wetlands in the vicinity of the airport. Such uses can increase bird activity which is a safety issue for airport operations.

APPENDIX 2: SUMMARY OF PROPOSED REVISION TO DRAFTCORK CITY DEVELOPMENT PLAN

Draft Development Plan Reference	Existing Provision of Draft Cork City Development Plan	Proposed Revised Provision	Reasons for Change
Volume 1 Objective 10.51 – Page 384	<p><i>“During the lifetime of the Plan, Cork City Council in co-operation with Dublin Airport Authority and in consultation with other relevant stakeholders including Transport Infrastructure Ireland, National Transport Authority and Cork County Council will prepare a framework plan to allow for the co-ordinated and sustainable growth of the Airport to underpin its function as an economic driver for the Southern Region. The relevant area for a new framework plan which will be prepared and adopted during the lifetime of this plan is delineated in Volume 2 Mapped Objectives. The Framework Plan will provide for a coherent and coordinated land use plan for the Airport and its immediate environs.”</i></p>	<p><i>“During the lifetime of the Plan, Cork City Council in collaboration with Cork Airport and in consultation with other relevant stakeholders including Transport Infrastructure Ireland, National Transport Authority and Cork County Council will prepare a framework plan to allow for the co-ordinated and sustainable growth of the Airport to underpin its function as an economic driver for the Southern Region. The relevant area for a new framework plan which will be prepared and adopted during the lifetime of this plan is delineated in Volume 2 Mapped Objectives. The Framework Plan will provide for a coherent and coordinated land use plan for the Airport and its immediate environs while maintaining flexibility to accommodate unforeseen emerging needs in the future.”</i></p>	To reflect the input required from Cork Airport for future development needs and layout needs and to acknowledge the need for flexibility in the Framework Plan.
Volume 1 Paragraph 10.190 – Page 380	<p><i>“The Airport is served by several car parks within walking distance of the terminal and there is currently adequate capacity for both passenger and staff parking to cater for current demand and for the medium term future.</i></p>	<p><i>“The Airport is served by several car parks within walking distance of the terminal and there is currently adequate capacity for both passenger and staff parking to cater for current demand and for the short term future. Additional parking requirements for the medium term shall be set out and provided for in the proposed Framework Plan”.</i></p>	To clarify the correct recent situation in respect of car parking demand and capacity and to provide for appropriate levels of additional parking that may be required within the lifetime of the plan to serve the airport.
Volume 1 Paragraph 10.192 – Page 380	<p><i>“10.192 Notwithstanding modal shift targets it is recognised that additional lands will be necessary to accommodate the parking requirements generated by increased passenger numbers in the longer term. Additional lands may be identified to allow for car park expansion, and these will be safeguarded in the new framework plan.</i></p>	<p><i>“10.192 Notwithstanding modal shift targets it is recognised that additional lands will be necessary to accommodate the parking requirements generated by increased passenger numbers in the longer term. Additional lands may be identified to allow for car park expansion, and these will be safeguarded in the new framework plan. The scale and location of such lands will be identified in collaboration with Cork Airport having regard to its long term future growth plans and operational and development requirements.”</i></p>	To reflect the input that will be required by Cork Airport to inform the future parking strategy to be incorporated into the Framework Plan.
Volume 1 Objective 10.49 – Page 383	<p><i>“Allow for Office based industry or tourism related projects requiring an Airport location, internationally traded services, corporate offices and uses that are complimentary to those in the existing Airport business park. All such proposals shall be accompanied by Traffic and Mobility management plans.”</i></p>	<p><i>“Allow for Office based industry or tourism related projects which would benefit from an Airport location, internationally traded services, corporate offices and uses that are complementary to those in the existing Airport business park. All such proposals shall be accompanied by Traffic and Mobility management plans.”</i></p>	Proposed wording of Draft Plan is unnecessarily restrictive. Proposed revised wording is in line with the policy set out at paragraphs 10.178 and 10.179.
Volume 1 Objective 10.50 – Page 384	<p><i>“To promote and support the operations of Cork International Airport subject to normal planning considerations in relation to:</i></p> <ul style="list-style-type: none"> • General aviation activity • Air transport infrastructure including but not limited to the expansion of the main terminal to include: • additional and enhanced security facilities, • construction of additional gates, • expansion of Airside Retail concession and leisure facilities, and a limited expansion of landside concession facilities • Future expansion of runway and apron including the runway end safety area and other infrastructure associated with operations of the runway 	<p><i>“To promote and support the operations of Cork International Airport subject to normal planning considerations in relation to:</i></p> <ul style="list-style-type: none"> • General aviation activity • Passenger terminal building and pier development • Cargo pier and associated building development • Runways, apron and aircraft stand development for commercial, light aircraft and helicopter craft • Control tower and associated development • Fire station, fire search and rescue and training facilities • Aircraft, vehicle and general maintenance and storage facilities • Car parks and coach parking • Car hire facilities • Public transport and taxi provisions • Airport hotel development 	A more generalised list of land use and activity types which are required within a general airport zoning area is more appropriate for a Development Plan general policy provision than specific project or development proposals. Specific proposals for the future development of the area will be more appropriately identified in the future Framework Plan

APPENDIX 2: SUMMARY OF PROPOSED REVISION TO DRAFTCORK CITY DEVELOPMENT PLAN

Draft Development Plan Reference	Existing Provision of Draft Cork City Development Plan	Proposed Revised Provision	Reasons for Change
	<ul style="list-style-type: none"> Refurbishment and reuse of former terminal for airport-related commercial uses Expansion of airport hotel Expansion of long-term parking facilities and limited expansion of staff parking Construction of bus / coach terminal Expansion of taxi facilities Defined car hire location Petrol Filling Station in an appropriate location if relocated and ancillary retail. <p><i>This list is not exhaustive, and consideration may be given to items not listed."</i></p>	<ul style="list-style-type: none"> Energy centre, fuel farm, auto-generating renewable energy development Petrol station Water storage and utilities provision Met Éireann facilities <p><i>This list is not exhaustive, and consideration may be given to items not listed."</i></p>	
Volume 1 Paragraph ZO22.2 – Page 540	<p><i>"Such uses include but are not restricted to: general aviation activity; air transport infrastructure including but not limited to the expansion of the main terminal including additional and enhanced security facilities, additional gates, expansion of airside retail concession and leisure facilities, and limited expansion of landside concession facilities; future extension and expansion of runways and aprons including but not limited to the Runway End Safety Area and other infrastructure associated with operations of the runway; refurbishment and re-use of former terminal for Airport related commercial uses; expansion of Airport Hotel; expansion of long-term parking facilities and limited expansion of staff parking facilities; construction of bus / coach terminal; expansion of taxi facilities; defined car hire location; petrol filling station in an appropriate location, if relocated, and ancillary retail. This list is not intended to be exhaustive and the other developments not listed will be considered, subject to normal planning and environmental considerations."</i></p>	<p><i>"Such uses include but are not restricted to: General aviation activity; Passenger terminal building and pier development; Cargo pier and associated building development; Runways, apron and aircraft stand development for commercial, light aircraft and helicopter craft; Control tower and associated development; Fire station, fire search and rescue and training facilities; Aircraft, vehicle and general maintenance and storage facilities; Car parks and coach parking; Car hire facilities; Public transport and taxi provisions; Airport hotel development; Energy centre, fuel farm, auto-generating renewable energy development; Petrol station; Water storage and utilities provision; Met Éireann facilities. This list is not intended to be exhaustive and the other developments not listed will be considered, subject to normal planning and environmental considerations."</i></p>	<p>General list of land use and activity types which are required within a general airport zoning area is more appropriate for a Development Plan general policy provision than specific project or development proposals.</p> <p>Specific proposals for the future development of the area will be more appropriately identified in the future Framework Plan</p>
Volume 1 Table 4.5 – Page 118	CBC 9 Cork Airport to City Centre via Turners Cross	CBC 9 Cork Airport to Kent Station via City Centre and Turners Cross.	<p>Proposed revision to reflect envisaged connection under CMATS for radial route from Cork Airport to Kent Station.</p> <p>To facilitate interconnection with rail and light rail.</p>
Volume 1 Figure 4.4 – Page 118	CBC 9 route shown running between Cork Airport and City Centre	Revise route CBC 9 to extend beyond City Centre to Kent Station.	<p>Proposed revision to reflect envisaged connection under CMATS for radial route from Cork Airport to Kent Station.</p> <p>To facilitate interconnection with rail and light rail.</p>
Volume 1 Figure 4.5 – Page 119	Figure 4.5 illustrates an orbital bus route and is labelled 'Key Stops'.	Key interchange stop locations between the orbital route and the each of the radial CBCs should be identified on Figure 4.5.	The identification of a key stop interchange between the orbital route and the Airport CBC will increase opportunities for encouraging sustainable travel to and from the airport
Volume 1 Paragraph	<i>"In conjunction with public transport improvements, it considered that enhanced modal shift targets aimed at reducing the number of private car journeys to the airport be provided for in the new</i>	<i>"In conjunction with public transport improvements, it considered that enhanced modal shift targets aimed at reducing the number of private car journeys to the airport be provided for in the new</i>	To ensure that modal shift targets are realistic and timely with due regard for the particular nature of

APPENDIX 2: SUMMARY OF PROPOSED REVISION TO DRAFTCORK CITY DEVELOPMENT PLAN

Draft Development Plan Reference	Existing Provision of Draft Cork City Development Plan	Proposed Revised Provision	Reasons for Change
10.191 – Page 380	<i>framework plan for the Airport. Cork City Council will work Dublin Airport Authority and the National Transport Authority to successfully achieve these targets.”</i>	<i>framework plan for the Airport. Cork City Council will work with Cork Airport and the National Transport Authority to successfully achieve these targets. Modal shift targets will be aligned to the unique nature and needs of an airport, with the level and timing of public transport improvements and with the proportion and nature of airport journeys that could practically avail of these services.”</i>	travel to and from the Airport as well as for the timing and nature of public transport provision.
Volume 1 Paragraph 4.129 – Page 131	<i>“At time of writing this Draft City Development Plan, consultants have been appointed by Cork City Council to appraise and design the new road and a number of route options are emerging. These will be considered at next stages of preparation of the Development Plan”.</i>	No specific revision proposed at this time as the options are yet to be placed on public display. Cork Airport however requests that Cork City Council consult directly with it in relation to the SDLR proposals before any detail on same is included in the next stage of the Development Plan on foot of the current provision of para. 4.129	Any potential new vehicular access to Cork Airport has implications for strategic layout and operations.