



**Uimhir Thagarta Uathúil:** CRK-C155-DEV21-336

**Údar:** McCutcheon Halley

**Stádas:** Submitted

**Aighneacht:**

Port of Cork Submission to Cork City Development Plan 2022 - 2028

**Comhairliúchán:**

Draft Cork City Development Plan 2022-2028

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## Litir Chumhdaigh

Port of Cork Company (POCC) is pleased to make this submission to the draft City County Development Plan 2022 – 2028 (draft CCDP). This submission has been prepared with the support of McCutcheon Halley Planning Consultants.

POCC welcome the draft CCDP and its objectives to deliver strong, compact growth in Cork to 2028. We fully support the recognition in the draft CCDP that the port is of national significance and a driver of economic development in the Cork region and the importance of the relocation of port facilities from South Docks (City Quays) and Tivoli to Ringaskiddy and other locations within Cork County.

The draft CCDP recognises that the relocation of Port Facilities away from the City will free up significant landbanks for housing and employment and allow the creation of compact vibrant urban neighbourhoods in Cork Docklands (City Quays and Tivoli). The draft CCDP also acknowledges that the Port's relocation is integral to the realisation of the significant population and housing ambitions for Cork contained in the National Planning Framework.

Tivoli Docks is identified in the draft CCDP as a nationally significant urban regeneration opportunity, which, together with City Docks, is inextricably linked to the delivery of compact growth in line with the ambitious population and employment growth targets set out for Cork City up to 2040. POCC are the sole landowners of Tivoli Docks and strongly welcome the development objectives for Tivoli.

As well as being a vital element to achieving the growth targets for Cork City, the redevelopment of Tivoli Docks is commercially necessary to finance the relocation of critical port infrastructure. POCC is categorised as a Tier 1 Port of National Significance under European policy. The Government places responsibility on Tier 1 ports to ensure efficient connectivity to international markets. Port companies are charged with being self-financing, which requires all infrastructure development to be delivered without state funding.

The purpose of this submission is to detail POCC's observations on the draft CCDP and request specific amendments to:

- Further support the relocation of port activities in Cork Harbour, recognising the strategic significance of the port to the national economy and to the projected growth of the Southern Region.
- Identify the key enablers to facilitate the relocation of Port activities from the Docklands and

Tivoli, and the future redevelopment of these areas as being:

- o Relocation of Seveso sites.

- o Provision of the M28

- o Upgrade of the R624 to expressway standard and to national road status.

- Recategorize Tivoli within the 'City' zone for Density and Building Heights and identify it as a

location suitable for exceptional tall buildings, subject to performance-based criteria. This submission is structured as follows:

1. Introduction

2. Relocation of Port Activities

3. Key Enablers

4. Density & Height Strategy for Tivoli

5. Conclusion

## **Tuairimí:**

### **Port of Cork Submission to Cork City Development Plan 2022 - 2028**

**Caibidil:** Volume 1 - Written Statement» 1.  
Introduction

Please refer to the report attached.

The draft CCDP identifies Tivoli as falling with the 'Inner Urban Suburban' category in terms of the Density and Building Heights Strategy. The target building height for lands within this category is in the range of 3 to 5 storeys.

It is submitted that Tivoli would be more appropriately zoned within the 'City' Density and Building Heights Strategy categorisation, alongside the City Centre, North Dock and South Docks for the following reasons:

- Tivoli is recognised as potential international exemplar of sustainable waterfront regeneration.
- The sustainable growth of Tivoli is identified as inextricably linked to Cork City achieving its ambitious growth targets.
- Significant investment in public transport infrastructure is proposed to deliver a new train station and pedestrian and cycling connectivity to the site.
- The National Planning Framework states that there will be a need for significant accelerated and urban focused growth to achieve its ambitious targets.
- National Policy Objective states that building height should be based on performance criteria

- The Building Height Guidelines 2018 call for the support of increased building heights in locations with good public transport and that there should not be blanket numerical limitations on building heights.

As a new urban quarter, with excellent public transport connections, Tivoli is well placed to support tall buildings subject to performance-based criteria. The designation of Tivoli as an 'Inner Urban Suburban' location is not appropriate to its development potential and importance in delivering growth targets for Cork.

The National Planning Framework (NPF) provides ambitious growth targets for the southern region, which are to be focused on compact growth to ensure sustainable development. These growth targets have been reflected in the draft CCiDP. The NPF identifies Cork as a city emerging as an international centre of scale, well placed to complement Dublin but in the need of **significant accelerated and urban focused growth** to achieve this role more fully. The NPF recognizes that to accommodate the level of growth required there will have to be a more **dynamic approach to urban land use** and that the existing character of land in urban areas may be subject to change.

The NPF supports, compact growth with an emphasis on the redevelopment of brownfield sites and a presumption in favour of development that can encourage more people and generate more jobs and activities within cities.

National Policy Objective 13 states that in urban areas, planning and related standards, including building height and car parking should be **based on performance criteria** that seek to achieve well- designed high-quality outcomes to achieve targeted growth.

The Regional Spatial and Economic Strategy for the Southern Region (RSES) identifies the attributes of Metropolitan areas as being accessible with national and international connectivity, strong business core, innovation, education, retail, health, and cultural role. The RSES supports the National Policy Objectives of the NPF in relation to sustainable residential densities, recognising the need to increase residential density in settlements, through a range of measures including, area or site-based regeneration and **increased building heights in appropriate locations**.

**Attachments:**

CRK-C155-DEV21-336-13102 - 3. SUB\_Port of Cork\_Submission draft CCiDP\_Final.pdf