



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

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# 1. Introduction

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:
  - Relocation of Seveso sites.
  - Provision of the M28
  - 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

## 2. Relocation of Port Activities

### 2.1 Submission Request

POCC welcome the text provided in section 4.148 recognising its national significance and supporting the relocation of facilities from South Docks and Tivoli to Ringaskiddy and other locations within Cork County. It is requested that this text is revised to identify the role of Marino Point Port facility and recognise the requirement for collaboration with all state agencies, national and local, and others to facilitate the Port's relocation.

*The Port of Cork is a port of national significance and a significant driver of economic development in the Cork region. This plan strongly supports the relocation of port facilities from South Docks and Tivoli to Ringaskiddy, **Marino Point and other locations in the Cork Lower Harbour. Cork City Council will work collaboratively with all state agencies, national and local, and other relevant stakeholders to facilitate the relocation of port facilities.***

### 2.2 Rationale

As a small open economy, Ireland is critically dependent on external trade to support its development, where practically all external trade is exported by sea. The Port of Cork is a Tier 1 Port of national significance and part of the European Ten-T network. Since Brexit its role as a direct link to European markets has become more significant and critical to the national economy and projected economic growth of the south-west region.

The Port has multiple locations in Cork Harbour and West Cork: Ringaskiddy, Marino Point, Cobh, Whitegate, Bantry, Tivoli, the City Quays and Whiddy Island. In the medium term the Port is to relocate its activities from Tivoli and the City Quays, freeing land for sustainable mixed-use development and consolidating its activities at the other locations in Cork County.

The key drivers influencing the relocation of Port activities from the upper harbour are:

- The projected growth in trade volumes handled by the Port of Cork due to the national significance of Cork serving a large population base with many significant customers.
- The Port's anticipated contribution to the long-term, sustainable development of the Irish economy, given its dependence on external trade.
- The existing physical constraints in handling larger vessels at Tivoli container terminal and the intensified operational constraints associated with projected further increase in container vessel size and cargo throughput.
- The changing nature of port activities, including the trend towards port-centred logistics, requiring a different nature of land banks adjacent to port facilities.
- National and regional spatial and economic strategy to develop Cork, and the role of the Port of Cork in this context.
- The catalytic role of the port in releasing port lands at City Quays and Tivoli to facilitate the re-development of the Cork Docklands into high-density, mixed-use development, and therefore to supporting the future sustainable growth of Cork City.

POCC has already made significant investment in the development of infrastructure to ensure it can provide the connectivity to international markets necessary to retain and improve Ireland's competitiveness, support the national economy, and enable economic growth for the south-west region. This investment has included the major redevelopment of Ringaskiddy terminal to facilitate the relocation of container trade and accommodate growth in the trade of bulk goods, and the purchase of Marino Point to deliver a dynamic hub for port related industry and increase the Port's capacity in the Lower Harbour. Significant additional investment is required to ensure that Port infrastructure will be able to meet the national economic growth targets to 2040.

Notwithstanding the significant investment by POCC in lower harbour infrastructure, POCC is not yet able to relocate all its activities from the Upper Harbour, due to constraints at Ringaskiddy and Marino Point, access road bottlenecks, and the need to develop additional port capacity. The Port's relocation from the City to lower harbour locations is necessary at a national, regional, and local level because of its role facilitating international trade and this has been recognised at EU level by the Connecting Europe grant aid received for the Ringaskiddy Container Terminal project. Port and port customer relocation will facilitate the redevelopment of the Docklands areas for significant urban regeneration. The strategic significance to the Port's relocation will require support and co-ordination across the planning framework and between Cork City and County Councils and other relevant stakeholders, including Transport Infrastructure Ireland and the HSA (ref. Seveso).

## 3. Key Enablers

### 3.1 Submission Request

POCC welcome the recognition in the draft CCDP of the need to relocate Seveso industries from the City to facilitate development, and of role of the M28 in supporting the relocation of Port operations away from the City. The following amendments to the draft plan are requested to strengthen recognition of the significance of key enablers to the Port's relocation and the City's growth targets:

*Amend Section 4.11*

*The ~~investment in~~ **delivery of** the M28 will **help** facilitate the Port of Cork relocating operations away from the City and will enhance the potential redevelopment of the Cork Docklands as a major mixed use centre whilst improving connectivity to the major sea port and strategic employment centre of Ringaskiddy.*

*Insert Section 4.11 (a)*

*The upgrade of the R624 to expressway standard and national road status is necessary to provide appropriate road transport capacity to facilitate the sustainable relocation of Port and port-related industries at Marino Point. Cork City Council will work in active partnership with Cork County Council and other relevant stakeholders to support this upgrade. This access upgrade to an EU Core Port is a requirement of EU Ten-T legislation.*

*Amend Section 9.35*

*Seveso III sites represent a significant constraint to realising the full development potential of the city, particularly with respect to Docklands and Tivoli. Their relocation to suitable locations outside the city is ~~desirable~~ **essential to achieve the growth targets for Cork City.***

*Amend Objective 9.20(b)*

*Relocation of Seveso III Sites: Cork City Council will actively seek the relocation of Seveso III facilities / activities to suitable alternative sites outside the City, **to enable the growth targets for Docklands and Tivoli to be realised.***

### 3.2 Rationale

#### Delivery of M28 & R624 Upgrade

POCC was granted planning permission in May 2015 for the redevelopment of its terminal at Ringaskiddy, to facilitate the relocation of its container terminal business from Tivoli, for an extension to its deep-water berth, and for the development of roll-on / roll-off freight traffic. The development was permitted subject to a restriction limiting the capacity of the terminal until such time as the

upgrade of the N28 and Dunkettle road upgrade are completed. While works on the Dunkettle interchange are well underway, the full capacity of Ringaskiddy terminal cannot be delivered until such time as the M28 is delivered.

It is also important to recognise that, when fully operational, the Ringaskiddy terminal will not have the capacity to accommodate all the trade currently operating from the City Docklands areas. There is a need for POCC to increase the port quayside and cargo handling infrastructure capacity further and operations at Marino Point (Belvelly Port Facility) are important in that regard.

The lands at Marino Point are subject to a Special Policy Area zoning in 2017 Cobh Municipal District Local Area Plan. The draft Cork County Development Plan 2022-2028 proposes to retain this zoning which provides redevelopment of the area for port-related development subject to several provisions, including improved road access between the N25 and Cobh.

Planning permission has been granted to undertake site development and enabling works, subject to conditions including agreeing a Construction Traffic Management Plan (CTMP) with Cork County Council. The CTMP limits HGV traffic on the R624 due to capacity constraints during peak hours.

The Port of Cork and Gouldings (Agricultural Fertiliser Company) currently have a live joint planning application at Marino Point, to facilitate new facility for Gouldings which would support their relocation from the City Quays and some initial operations by the port. The relocation of Gouldings, which is a Seveso industry, from City Quays would be a key enabler for the City's development objectives at the South Docks. Nonetheless, a key constraint to the commercial viability of Gouldings' relocation and the port's enhanced operations will be the capacity of the R624. The upgrade of the R624 to national road status is required to support the relocation of Gouldings, and the port's activities at Marino Point. The potential of Marino Point to accommodate other port-related industries from Tivoli is also severely constrained pending a future upgrade of the R624.

There is a direct correlation between the delivery of the M28, the upgrade of the R624 to national road standard and the capacity of Cork City to achieve its ambitious growth targets. It is in the interests of Cork City Council to become an active stakeholder seeking the delivery of these important infrastructure upgrades.

#### [Seveso](#)

The CCDP already recognises the limiting effect Seveso industries have on the growth potential of Cork City and the importance of facilitating their relocation. POCC consider that these references could be strengthened to clarify that the relocation of Seveso industries are essential if the development targets for the City Docklands and Tivoli are to be achieved.

## 4. Density & Height Strategy for Tivoli

### 4.1 Submission Request

The draft CCDP provides a strong vision for Tivoli Docks as a significant urban regeneration opportunity for Cork City, inextricably linked to the delivery of compact growth targets in the City. POCC strongly support and welcome the vision for the Tivoli site and are committed to its redevelopment in the medium term. POCC also welcome the recognition in the draft CCDP that, pending alternative facilities, Tivoli will remain a working commercial port and its activities must be supported to maintain the region's connectivity with international markets.

The following amendments to the draft plan are requested to enhance the capacity of Tivoli to deliver high quality compact growth.

*Recategorize Tivoli within the 'City' zone for Density and Building Heights and identify it as a location for exceptional tall buildings, subject to performance-based criteria – reference above*

## 4.2 Rationale

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 CCDP. 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**.

## 5. Conclusion

The Port of Cork Company welcome the draft CCDP. 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 points made in this submission are aimed at clarifying and emphasising the significance of the key enablers to facilitate the relocation of port and port related activities from the City and seeking a policy framework which will ensure that the full re-development potential of Tivoli can be realised.

Thank you for your consideration of this submission. We would be happy to provide further clarification on any of the issue raised in the submission if required and look forward to continuing to work with Cork City Council in the economic growth of Cork.

Regards,

A handwritten signature in black ink, appearing to be 'H Kingston', with a long horizontal stroke extending to the right.

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