



Cork City Development Plan 2022 – 2028

Cork Chamber Submission

October 2021

Introduction

Cork Chamber represents 1,200 members together employing 100,000 people throughout the city, metropolitan area and county. Our vision is to be a world-leading Chamber of Commerce, delivering on a progressive economic, social and sustainability agenda at the heart of a vibrant business community.

As such, we are determined to ensure that our 202-year-old Chamber continues to create a positive legacy. Our direction is guided by our formal pledge to uphold the United Nations Sustainable Development Goals, five of which have been identified by the Chambers Ireland network.



Cork Chamber welcomes the opportunity to make a submission on the Draft Cork City Development Plan 2021. This submission is focused on positioning Cork as an area of exemplary economic resilience by mobilising our metropolitan area to differentiate itself internationally through the lens of the UN Sustainable Development Goals. The Metropolitan Cork area is the most productive and efficient economy of scale in the Southern Region and as such is well positioned to deliver significant value and growth to the national economy. While we recognise that strategic planning is about setting a long-term vision, the current pandemic has also put into sharp focus the urgent need for development in areas such as mobility and safety.

The future for Cork as envisioned by the National Planning Framework (NPF) and supported by the National Development Plan (NDP) and Regional, Spatial and Economy Strategy (RSES), and the Cork Metropolitan Area Transport Strategy (CMATS) is key to the ambitions of the Southern Region and the country as a whole. It is essential that in complement discretionary funding streams such as the URDF, Recovery & Resilience Facility and countless others, continue to be robustly competed for and drawn down in good time.

As a metropolitan area, Cork has irrefutable endowments. Cork has a current population and growth forecast equivalent to two of the next largest city regions combined. Its harbour and coastline,

global economic clusters, international connectivity (port, airport and digital infrastructure), road infrastructure, energy infrastructure, population base, world leading higher education institutions, skills, culture and quality of life provide a strong platform to achieve the goals as outlined in the NPF. It has also carved out a reputation as a national frontrunner on pedestrianisation, outdoor experience and placemaking over the course of the pandemic. Like all competitive edges, the only way to sustain this reputation is to keep working and delivering in this space.

Through continued investment aided by a strong development plan, there is an opportunity to ensure that Cork not only meets its targets but continues to outperform other city regions. Contemporary infrastructural provision and progressive placemaking are the sector neutral enablers that will be critical in realising this goal.

Cork Chamber Macro Perspective

It must be noted that this Development Plan takes place at a point of stark climate emergency warnings from the Intergovernmental Panel on Climate Change. The latest IPCC report, published in August, warned that unless there are immediate, rapid and large-scale reductions in greenhouse gas emissions, limiting warming to close to 1.5°C or even 2°C will be beyond reach with catastrophic effects.

The dynamic and broad effects of policy changes are obvious, provable, and well known to those dealing with investors and businesses - but they are hard to measure precisely at a macro level. However, that does not mean that they do not exist, that they are not real or that the costs / benefits of them are any less expensive or valuable than statically measured and narrow costs. If one ignores them, then one overestimates the costs, and underestimates the benefits, of sustainable policy measures.

For example, in solving the viability of high-density brownfield development, the long-term environmental impact of urban sprawl must be considered a cost to be incurred by the State. The renewable energy sector, and its ability to not only generate economic value but also decarbonise our economy is another prime example. On the other side of the coin, we act conservatively, degrade our environment, and pay the ultimate long-term spatial fiscal and societal price.

While there is a risk in estimating broad and dynamic effects (i.e., the estimates may be wrong), there is an even greater risk in not taking these effects into account or in taking them into account insufficiently (i.e., the risk of foregoing opportunities to benefit the wider economy). Additionally, the risk of action is oft-times overestimated and the risk of inaction underestimated. This is partially because the costs of inaction are often opportunity costs (e.g., jobs, investment, cleaner environment, and competitiveness) which are largely invisible. As an open economy on the edge of Europe, these broad and dynamic effects are more pronounced. This point must be considered in the finalisation of the Development Plan, which is so critical to economic confidence and environmental resilience. Global perspective and big picture thinking must be applied arm in arm with the most intricate and sincere level of local community engagement.

Infrastructural investment is the mainstay of business confidence and sets the course for future competitiveness. As society evolves, so too does the nature of infrastructure required. The members

of Cork Chamber fully endorse at 91% the need to incorporate wellbeing and quality of life into the decision making processes surrounding infrastructure.

In 2019, New Zealand Treasury introduced the Living Standards Framework (LSF) to capture what matters for New Zealanders' wellbeing, now and into the future. The framework integrates planning about policy impacts on wellbeing, taking a long-term perspective on people, places and generations. The LSF complements rather than replaces traditional economic tools such as GDP and aims to enhance, support and underpin comprehensive and robust policy development.

Strategic Objectives 1&2:

Compact Liveable Growth

Delivering Homes and Communities

One of the key objectives of this plan is to integrate land-use and transport in a bid to achieve a compact city. The benefits of compact cities are well documented and reap huge benefits including environmental, economic, and social sustainability. The concept of compact cities is also one of the focal points of the National Planning Framework which states that in the long term, meeting Ireland's development needs in housing, employment, services and amenities on mainly greenfield locations will cost at least twice that of a compact growth-based approach¹. In Swedish cities such as Gothenburg and Helsingborg the compact city model is being used to handle population and employment increases and its successful implementation is already being used as an example of best practice in achieving sustainable outcomes².

The concept of a '15-minute city' and 'walkable neighbourhoods' are two key approaches being adopted in the Draft City Development Plan. Cork Chamber fully supports these concepts as a means to achieve a compact liveable city. There are a number of measures proposed in the plan that will contribute to these concepts including a requirement to ensure that at least 66% of all new homes will be provided within the existing footprint of Cork. Furthermore, under the plans an effort will be made to ensure that 33% of all new homes will be provided within brownfield sites in Cork.

In our recent Q2 Economic Trends survey our members identified housing as one of the top priorities for Budget 2022, which is consistent with our member priorities in recent years. As society evolves, so too does the nature of infrastructure required. The members of Cork Chamber fully endorse (91%) the need to incorporate wellbeing and quality of life into the decision making processes surrounding infrastructure³. It is therefore positive to see plans in the Draft City Development Plan

¹ <https://npf.ie/wp-content/uploads/Project-Ireland-2040-NPF.pdf>

² <https://www.sciencedirect.com/science/article/pii/S266616592030017X#tbl4>

³ <https://www.corkchamber.ie/wp-content/uploads/2021/09/CCBudgetSub2022v4.pdf>

for the mixed use of an appropriate mix of dwelling types to meet target residential densities. However, apartment viability remains an ongoing concern.

In Cork no new private apartment schemes of scale have been completed since 2008⁴. The issue was highlighted in a recent CIF/Cork Chamber report produced by KPMG, the findings of which show that (based on current costs) many of the 300,000 homes promised for delivery within the private sector by 2030 are unviable.⁵ This is an issue that must be overcome as the population of the city is set to steadily increase in the coming decade.

While the aforementioned report focusses on national actions, we encourage Cork City Council to take every discretionary step available at a local level, to provide an environment in which apartment living can be made viable. It is important that mechanisms such as development levies are not a barrier to viability and that the Council takes a progressive view to ensure delivery. Support from both Government and local authorities in regard to the viability of infill/brownfield sites is considered necessary to ensure the policy of providing 50% of development in urban areas on infill/brownfield sites can be achieved.

Cork Chamber welcomes the ambition for development on brownfield sites (the objective to have 33% of all new homes provided within brownfield sites) however the development plan should include a requirement for a revision of this target if it is not being delivered. The delivery of housing must be the primary goal to address the ongoing housing shortage here in Cork and depending on brownfield sites could be problematic if issues such as viability prevent delivery. The City Capacity Study that was carried out to assess the different lands in the city should also be made available in supporting documentation.

The density targets provided for in the development plan take into account the need for varying density levels in different areas of the city to cater for a range of house types. However, Cork Chamber notes that the density targets place a strong emphasis on apartment delivery outside the city centre and docklands area. This is appropriate adjacent to urban centres and transport corridors but may not be beneficial if applied in a blanket manner. While there is a need for the development of apartments outside the city centre, the need for family housing units is greater and the density requirement per hectare outside of the city centre may impact on viability and delivery. A marginally lower density per hectare is advised. Cork Chamber would call for a revision of these density targets outside of the city centre to ensure adequate provision of housing suitable for families.

Adequate provision of zoned and deliverable lands in the city, suburbs, and urban centres such as Glanmire, Blarney, and Ballincollig is essential or the housing crisis will be compounded.

The delivery of homes must equate to the delivery of communities. The €400 million URDF funding that was allocated for a number of projects in the city including Cork City Docklands, Beamish and Crawford / Grand Parade Quarter, Kent Station Yard and Tivoli Docks will be a key tool in the

⁴ <https://www.corkchamber.ie/wp-content/uploads/2019/09/Viability-and-Affordability-of-Apartment-Building-in-Cork-City.pdf>

⁵ <https://www.corkchamber.ie/wp-content/uploads/2021/07/Apartment-Viability-Report-FINAL-13-July-2021.pdf>

development of communities and must be commended. It is essential that clear URDF milestones for the Docklands are set out. Plans to revamp Bishop Lucey Park as well as the Beamish and Crawford Quarter Infrastructure Public Realm project are extremely positive and will have a catalytic effect on the surrounding areas.

It is imperative that not only does the proposed City Development Plan deliver on this funding in the lifetime of the plan itself, but it must also seek to expand on it. St Finbarr's Quarter is adjacent to much of the current regenerative activity and is a logical follow-on point that would bring value from a tourism and heritage perspective. With a more thoughtful mobility approach it can also act as a corridor better linking UCC to its expanding campus on Union Quay.

Upgrades to the Shandon quarter have enhanced the public space with new paving and benches as well as investment in Firkin Crane. The prospect of a business hub is also exciting and welcome. However, this upgrade needs to be complemented by enhancing the connection between the city and Shandon quarter itself which is of immense value to the tourist offering in the city. This should include new signage, the widening of footpaths, and creative lighting from the city through to the quays and onwards to Shandon quarter. There are connecting alleyways, steps, and side streets between the city and the Shandon quarter that are unique in character and value. The walk between the city and Shandon quarter should appeal to residents, visitors, and tourists alike. It would also encourage additional hospitality and retail to locate on this side of the city.

In addition, there is real potential within the lifetime of this plan to reimagine public spaces in many areas such as Blackpool which has been affected by dereliction, flooding and lack of services in recent years.

It's important that communities are diverse and welcoming and to this end one of the primary tools of the planning system is to ensure that in so far as possible all new and regenerative communities include a blend of private, social and affordable housing. It is important that in the rush to provide any one type of housing tenure that value of this integration is not lost or side-lined.

It is essential that in line with service demand and projected growth the City Council continues to invest in every aspect of its planning function from personnel to online to ensure that service provision does not at any point become a limiting factor in planning and delivery.

Strategic Objectives 3: Transport and Mobility

The implementation of the Cork Metropolitan Area Transport Strategy (CMATS) is undoubtedly in sharp focus in this Draft City Development Plan however it must be robustly supported and delivered with urgency in the lifetime of the plan. When factoring in planning, funding and construction time cycles, it is clear that active progress must be made on every front, to ensure that delivery on the ground is maintained. There are pitfalls at every turn in the delivery of infrastructure and put simply, City Council must ensure that delivery is always taking place. Delivery of CMATS should be considered a minimum viable indicative template and every opportunity should be sought in every corner of the city to apply the ethos of CMATS in the most proactive manner.

If delivered the anticipated modal shift associated with CMATS will deliver long term benefits for generations to come and will secure the future of the city. It is therefore of utmost importance that proposals contained within CMATS such as a Light Rail System, which would service the route from Ballincollig to Mahon, are progressed. It is imperative that suburban rail services are upgraded also. CMATS provides for six new train stations at Monard, Blackpool, Tivoli, Carrigtwohill West, Waterrock and Ballynoe along the existing Cork-Mallow and Cork-Midleton rail lines. Without these upgrades it will be difficult to encourage many people living in suburban areas to substitute private cars for public transport.

CMATS proposes a €1.39 billion investment in roads and an effective and safe road network is essential. Equally, the tension between the emissions and other environmental impacts associated with roads must be acknowledged. Cork Chamber endorse the national 2:1 spend ratio set out in the Programme for Government. Where roads are enhanced or constructed there must be clear strategic rationale, and they must be carried forward in a manner that holistically addresses the mobility of an area rather than encouraging further car dependence. Any new or enhanced road must be part of a transport corridor that facilitates safe sustainable mobility. At points of congestion, public transport corridors must be facilitated. Public transport cannot become the dominant mode until such time as it can move freely past the private car. It can never again be the case that road investment is sole priority.

Roads that are of strategic regional connectivity are essential and Cork Chamber supports enhanced inter and intra-regional connectivity with investments such as the M20, M28, and Dunkettle Interchange. Each is essential for different reasons. The M20 as a transport corridor that links CMATS to LSMATS and not only includes motorway upgrade but also rail and cycle. The M28 as the key that unlocks the potential of both the port and docklands. The Dunkettle interchange as the obvious regional bottleneck that must unquestionably be addressed.

The Cork North Ring Road will be essential to remove Heavy Goods Vehicles from the City with residential areas such as Ballyvolane and Blackpool currently shouldering a volume and type of traffic that is unsuitable for any residential area. Its design must facilitate cycle lanes, and a widening of footpaths as well as dedicated bus lanes at any point of foreseeable congestion.

It is also welcome to see plans for a Cork Northern Distributor Road and a Southern Distributor Link Road (as identified in CMATS) contained within this plan as both will create opportunities for the rollout of sustainable transport measures as well as creating opportunities, particularly on the northside of the city, for sustainable development of existing landbanks. Again, it is essential that these developments enhance sustainable mobility rather than uniquely take precious space for the private vehicle. Whether by offering a new dedicated sustainable mobility corridor online, or creating opportunity to create them offline, a rule that could be implemented would be to ensure that no new road infrastructure is added without a commensurable enhancement in sustainable mobility infrastructure.

Walking and cycling reduce the amount of vehicular traffic on the road and also provide benefits to both the individual and society. To encourage more people to consider this, there is a need to provide a safe infrastructure within which people can commute to work either through walking or cycling solely or as part of a mixed use of the public transport network. The existing CMATS plans

must continue to be built on with projects such as *Lee to Sea* a prime example of the opportunity available. CMATS makes strong provision for improvements to cycle and pedestrian infrastructure which we believe could be implemented fully and at pace.

Park and rides (increasingly known as mobility hubs) are an essential component of CMATS and it must be acknowledged that within the metropolitan area, due to the proliferation of low density and one-off housing models, the majority of journeys do and will begin in a private car. However, journeys need not be completed by this single mode if adequate Park and Ride facilities can be put in place. In the short term, significant Park and ride facilities must be developed at each point of access to the city and must be served by connected multi-modal transport options from walking to bike, rail and bus. Public transport cannot become dominant until it becomes quicker than a private car, and every effort must be made to ensure that this shift takes place.

Cork Chamber would encourage the introduction of reduced speed limits across the city centre to 30kph. This is the safest way to ensure all users of the road and path networks can be accommodated in the existing infrastructure. It enhances safety, reduces noise and pollution, and helps our urban areas to be pleasant locations for trade and amenity alike.

The plan should also cater to the multiple ways in which publicly available sustainable mobility is provided. It should encourage the expansion of the existing bike scheme, but also allow for private operators of micro mobility options schemes such as e-scooters, and car rental schemes such as those operated by Go-Car.

This Development Plan must facilitate the shifting environment surrounding the way in which we power our mobility. The plan must not only facilitate but encourage the incorporation of electric charge points throughout the City, and in residential, community and commercial settings. It must also set the scene for the inevitable integration of hydrogen into the mobility mix and facilitate and promote its proactive rollout.

Finally, Cork airport will be a key driver of Cork's economic recovery and is of regional economic significance. It must be prioritised from a local connectivity perspective relative to CMATS. It must also be protected from a planning perspective to enable future traffic growth. It is not appropriate to have residential development in the vicinity of Cork Airport.

Strategic Objectives 4: Climate and Environment

It is positive to see a willingness to support and surpass the implementation of international policy and national legislation on climate change in the Draft City Development Plan. Cork must emerge as a leader in this sphere if it is to distinguish itself as one of Ireland's and Europe's major cities. It is an uncomfortable fact that climate adaptation measures are already required today, but by taking a proactive approach there can be every reason for positivity. It is reputationally critical.

Cork city has been the victim of the effects of climate change in recent years with businesses and homes in the city centre severely impacted by recurring flooding events. The Lower Lee Flood Relief project aims to alleviate flooding in the city and is an essential adaptation measure. The works at

Morrison's Island are critical not only to flooding but to the adjacent public realm which is so poorly used at present. Resilience building is ever more a necessary undertaking and a prudent approach to negating economic loss and to ensuring the sustainability of communities and safety of citizens. While efforts are ongoing to address climate change and the Government has committed to a 51% reduction in carbon emissions by 2030 and net zero by 2050, Ireland can still expect effects from the damage that has already been caused. The City Development Plan offers a real opportunity for progress in the coming years and particularly in the areas of adaptation. Therefore, interventions such as the Lower Lee Flood Relief Scheme must be supported and progressed with urgency.

Cork Chamber welcomes plans to identify and implement a *Decarbonising Zone* within the city through engagement with local communities and other relevant stakeholders. In addition to methods such as public transport, cycling and walking all other sustainable modes of sustainable transport must be supported. Transport emissions are the number two contributor to Ireland's overall GHG emissions and we need to continue our efforts to transition our public vehicles to more sustainable sources of fuel such as electricity and hydrogen. The plan should provide for hydrogen refuelling stations for buses as well as the steady roll out of electrical car charge points throughout the City region.

At a point nearing full implementation of CMATS an analysis of congestion charges should be undertaken, and if deemed appropriate trialled in the designed pilot decarbonising zone. Many cities have had success with the implementation of these charges despite controversy surrounding their introduction. In Stockholm, for example, these types of charges were introduced on a permanent basis in 2007 and there is evidence they have contributed to an increase in the sale of more environmentally friendly vehicles as 'alternative fuel cars were exempt until 2012'⁶.

Strategic Objectives 5: Green & Blue Infrastructure, Open Space and Biodiversity

This plan must formally recognise biodiversity as a key infrastructural component of the City with multiple roles, in carbon sequestration, air quality, noise pollution, mental health and countless others overtly acknowledged. It must actively promote the integration of more biodiversity on the city's streets with clear and significant targets. It is not appropriate to restrict biodiversity to designated spaces, it must be encouraged in a linear manner throughout the city.

The benefits of additional tree planting and greening are widespread and have impacts environmentally, visually and from a health perspective. According to the Food and Agriculture Organization of the UN one tree can absorb as much as 150 kilograms of carbon dioxide annually⁷. In Melbourne the city's authorities have set planting targets in a bid to maintain their city for those who live and work there as well as tackling climate change. 3,000 trees are to be planted every year

⁶ <https://www.itf-oecd.org/sites/default/files/docs/swedish-congestion-charges.pdf>

⁷ <https://www.un.org/esa/forests/news/2019/03/on-international-day-unece-fao-forestry-and-timber-section-releases-10-facts-to-fall-in-love-with-forests/index.html>

up to 2040 in a bid to boost canopy cover from 22% to 40%⁸. The climate emergency must be tackled from every available angle.

A programme of appropriate scale but of similar ambition to that of the Civilian Conservation Corps in the US, who planted 3.5 billion trees, and created and landscaped 711 state parks from 1933 to 1942 should be implemented. The CCC model is now outdated, but its legacy is beyond reproach. Funding should be provided for an appropriate contemporary delivery model.

Cork Chamber welcomes the commitment to ensuring that all residents have access to parks and public spaces, particularly the presumption against development of land zoned for public open space being used for alternative purposes. Cork City Council should also be commended for a proposal to prepare a citywide Open Space Strategy in the lifetime of this plan. In the planning of new public spaces and plazas associated with new developments, every opportunity should be taken to create credible space for biodiversity, rather than token planting.

The Chamber is supportive of green roof targets. The requirements should not be so excessive as to compromise viability of projects, but every small intervention, when added together can have a significant cumulative effect. This application should range from new builds to bus stops.

Cork City Council has pledged to work with stakeholders in facilitating safe, improved accessibility to the water environment including the River Lee and Cork harbour. This commitment must be enacted with haste as the river is currently an underutilised amenity for locals and tourists alike. The plan must facilitate enhanced access to the Lee at existing access points and encourage new access points, and pontoons. The feasibility of a water taxi that would ferry passengers from the city to areas such as Cobh, Haulbowline and Ringaskiddy should also be considered and catered for in this plan as another transport and tourism offering.

Given the unrivalled nature of water as an amenity the culverting of rivers should be carefully considered in the Plan. There may be a case for uncovering certain waterways and restoring them to their natural state. We cite the restoration of the Singel canal in Utrecht as an exemplary case study.⁹ It has created both an amenity and a global thought leadership position for the City. The City should explore this possible opportunity over the lifetime of the Development Plan.

It is essential that the consideration of active leisure facilities is broad, contemporary, and urban. The draft ARI study¹⁰ highlights a deficit across many forms of active recreation infrastructure. The development of an active recreation strategy with a clear parent directorate driving capital projects will be essential if the deficit is to be tackled and progressed in line with projected growth. The scope must be diverse and contemporary, encompassing elements such as skateboarding, bmxing, basketball, parkour and other activities increasingly synonymous with urban areas worldwide. All sports offer life skills, but given the relationship of Cork to its waterways for both leisure and safety,

⁸ <https://www.melbourne.vic.gov.au/community/greening-the-city/urban-forest/Pages/urban-forest-strategy.aspx>

⁹ <https://www.dutchnews.nl/news/2020/09/joining-the-circle-utrecht-removes-road-to-be-ringed-by-water-once-more/>

¹⁰ <https://www.corkcity.ie/en/media-folder/cork-city-development-plan/ccr-active-recreation-infrastructure-needs-study-draft-report.pdf>

the provision of public swimming pools, indoor and lido must return in earnest to the development plans for the City.

Strategic Objectives 6: Economy and Employment

The Cork City Strategic Employment Locations Study¹¹ proposes the zoning of employment land to meet a jobs target of 47,000 of which 31,000 will be office based and light manufacturing including logistics over the period to 2028. The study also found that of the 650ha of employment zoned land in Cork City, 417ha is undeveloped. As a result, the plan seeks to reprioritise this with a review of undeveloped lands in Tivoli, Kilbarry, Ballincollig, Cork International Airport and the Cork Science and Innovation Park.

As such the Development Plan provides for approximately 243ha of zoned, undeveloped employment land. It is essential that this provision is an adequate allocation, and enough deliverable land is available for the multiple types of premises that may be required over the course of the plan.

Cork Chamber supports the four strategic employment sites identified in the plan (Cork Science and Innovation Park, Cork International Airport, Ballincollig and Tivoli) as areas that can be developed for economic and employment purposes. Additional areas identified as strategic employment sites must also be given due attention; Blarney Business Park, Clogheen Business Park, Land at Glanmire, South Link Industrial Estate, Fairhill and land at Holyhill.

The Chamber does also however, promote the City centre as the primary area for office development, as it can offer the best mobility options while also having a regenerative effect. It can and must cater to all types of office provision from large floorplate newbuilds to small floorplate interventions. In some respects, the City centre is in competition with the above listed locations, and it must not be disadvantaged. We note that parking levels are reduced relative to the last plan by between 50% and 60%. In the city core, this would create standards more onerous than those currently in Dublin City and eight times more stringent than those set for Cork County. While acknowledging the presumed intent of acting to reduce car dependency we have concerns as regards the short-term results of this measure. For example, if minimal car parking levels are imposed on a city development, it could see the investment fully displaced to another location, thus missing the bigger picture opportunity for City regeneration. Ultimately, while we await the implementation of CMATS, many employers will still seek a level of private parking. This must be robustly addressed by CMATS, but should not compromise City investment opportunities, that could go elsewhere in the short term.

It is welcome to see the development of community enterprise centres being provided for in this plan in a bid to encourage more employment opportunities in every neighbourhood in the city. This will have a direct impact on commuting requirements and the higher-than-average dependence on

¹¹ <https://www.corkcity.ie/en/media-folder/cork-city-development-plan/cork-city-strategic-employment-locations-study.pdf>

private cars in Cork city to get to and from work. It will be an essential part of developing a compact city.

Cork Chamber would also encourage a vibrant mix of uses within the designated centres outlined in the development plan. To have people living in the city is fundamentally important to the economic vibrancy of the city centre, and it is therefore of utmost importance that there is a blend of retail, residential, services and hospitality in any one area.

Curraheen has potential for future development and with its proximity to Cork University Hospital, UCC and MTU it provides a logical location for further investment. The area will be serviced by a light rail option once the ambitions of CMATS are realised, and it is already served by the 208 bus and the 205, 220 and walkways nearby. The area is home to the Cork Science and Innovation Park where UCC are advancing plans for a new dental school and health innovation hub. The innovation hub can play a nationally significant role in a national innovation district strategy and is deserving of every support in the development plan. It can be a location for both third level and private sector investment and deepen the research and development partnerships which are so valuable to the tenacity of FDI investment.

The Cork University Business School (CUBS) expansion into the heart of the city is another step in the ever-evolving economy of the city centre that will help cement Cork as a City of Learning. The City Development Plan should support the evolution of this business education quarter as it will bring benefits for the city including talent, international students, a welcoming accessible and visible education sector, and a strong relationship between city centre businesses and the education sector. From a Cork University Business School (CUBS) perspective 4,500 students and 225 staff will be located in the city at this location. This footfall will boost the hospitality sector as well as increasing the vibrancy of the city. The proximity of CUBS to the Docklands, Lapps Quay, and Morrison's Island will provide a real and physical connection between business and education. CUBS currently has 14 key undergraduate programmes, 13 of which have mandatory work placements. This will enhance further the connection between businesses and potential graduates and will be of great economic and employment benefit to the city. Cork Chamber would also take this opportunity to advise that the business/education district does not preclude other uses such as residential.

There should at all times be flexibility in zoning for complementary uses. Of course, uses of stark contrast such as industrial and residential are best separated, and zoning must always be a key tool to shape our built environment, but the ideology of inflexible zoning is no longer applicable in all cases.

For example, to ensure vibrancy, it should be appropriate to facilitate residential, office or hospitality on St Patrick's Street. Of course, they should not be the dominant uses, but where appropriate development proposals which come forward that might enliven the area should be actively supported. It is equally important that large scale anchor retailer schemes are supported throughout the plan. We note for example, the immense value of the ongoing development of the Primark facility for inducing City centre footfall and other similar projects should be proactively encouraged and facilitated. Likewise, the resurgent Mc Curtain Steet and Victorian Quarter should support a medley of uses as this is core to its appeal. The City Centre plays multiple roles, each of

which are complementary, and the plan should reflect this with a contemporary approach to zoning. This thinking should not just be facilitated, but actively encouraged.

It is important that the plan supports the required healthcare infrastructure such as the proposed elective hospital and that steps are taken to secure a logical and deliverable location for this essential asset.

Strategic Objectives 7: Heritage, Arts and Culture

Cork is on the cusp of recovery as it begins to emerge from the COVID19 pandemic. The heritage of Cork City and its rich Arts and Culture scene will be a great part of that recovery. It is therefore positive to see a commitment in this plan to promote the retention, reuse, and enhancement of buildings and other elements of architectural, archaeological and other significance, while also acknowledging national policy in relation to archaeological monuments.

Plans for an Event Centre in Cork have become the subject of much debate in recent years and while there are many factors at play in relation to the delivery of the facility, this City Development Plan must do everything within its power to ensure that the city is ready for the level of activity this venue will bring. The widening of footpaths, reliable and frequent public transport, and accommodation options must all be in place in advance of the delivery of this highly anticipated site.

Cork City Council must be commended for its support of street art initiatives such as the 'Ardú Murals' which have greatly enhanced key locations across the city that were otherwise lacking colour and character. It is important that this momentum is maintained throughout the lifetime of this plan, and this type of creativity continues to be encouraged. In parallel the evolution of long-standing institutions such as the Crawford must continue to be endorsed.

The city's quay walls and any remnants of the medieval city wall should be restored, protected and carefully adapted. This infrastructure is a unique part of our heritage and will allow the history of the city to stay alive. Through the delivery of the Lower Lee Flood Relief Scheme there should be as much restoration of quay walls as possible throughout the city. The planned evolution of Bishop Lucey Park has taken into account the importance of the city wall and its retention has been incorporated into the overall design. It is important that this development plan takes a similar approach, and this should not be solely confined to the city's historic walls. Other historic features should be protected in a manner that retains what is visually important but also allows development. Conducting an audit of the city's architecture and determining the value of its heritage, while adhering to national laws, would protect the city's most valuable architectural assets while also allowing development. It is important that 20th century heritage is included and assessed to give clarity as regards which buildings and features the City considers to be of architectural heritage.

Cork City Council has pledged to progress the implementation of its Arts and Culture Strategy for the period 2021-2025 throughout the course of this lifetime. As part of this strategy areas for potential skate parks, basketball courts and modern playgrounds that cater for all ages should be explored

with a view to becoming a reality by the expiration of the City Development Plan itself. Skateparks, basketball courts and playgrounds build and sustain healthy communities, provide an outlet for youth, and have been known to curb antisocial behaviour. The inclusion of such facilities will ensure that the city is a place for all, not just tourists, employees and shoppers.

Tourism in Cork is vital to the success of the city and to a strong economy going forwards. The development of tourist attractions needs to be taken into consideration as part of this development plan. Dublin and Belfast cities are both well known for attractions such as the Guinness Store House and Titanic Belfast. Cork city must strive to accentuate its tourist attractions and develop them further so the city becomes a must-see destination on tourists travel itineraries. The Chamber supports the plans for Páirc Uí Chaoimh to develop a visitor experience, and a maritime museum at the Port of Cork sites. It is essential that the plan not only supports these initiatives, but others of comparable ambition.

Strategic Objectives 8: Environmental Infrastructure

The protection of the environment, measures to tackle pollution, improve air quality and the installation of good quality infrastructure are all vital components of a thriving city. The objectives in this plan pertaining to the management of the city's water resources and water services infrastructure are robust and it is positive to see support for the work of Irish Water within the city in relation to water conservation.

One of the biggest issues facing Cork City in recent years is flood protection. It is crucial that all flood protection measures that are planned for the city come to fruition particularly the Lower Lee Flood Relief Scheme which will prevent the devastating damage experienced by many traders and locals in recent years. It is welcome to see this City Development Plan supportive of the ongoing efforts by the Office of Public Works in this regard. Cork Chamber also fully supports various other flood protection schemes in the city that must be progressed with urgency including schemes in Blackpool, Glanmire/Glashaboy, and Douglas/Togher.

The energy needs of Cork City will change and intensify as the region experiences employment and population growth. The Draft City Development Plan addresses the need to support a safe, secure and reliable supply of energy in association with the various service providers as well as the safeguarding of strategic energy corridors from encroachment by other developments that could compromise the delivery of energy networks. However, it is possibly more beneficial to look towards maximising the potential of the region in relation to energy provision. Home to Ireland's Energy Hub, Cork has significant potential to develop further with significant growth potential for renewables such as floating offshore wind, onshore wind, anaerobic digestion, green hydrogen and solar PV, all of which have potential to generate significant economic value and employment and contribute immeasurably to the sustainable credentials of the region and nationally. It is essential that this plan fully supports the current and future investment and activity that is taking place in Cork. Renewable energy sources will be the driving force in securing Cork's future and ensuring it is an attractive location for FDI.

District heating is among the renewable energy sources referenced in the Draft City Development Plan. In accommodating more compact and sustainable patterns of development, Cork City Council have pledged to assess the feasibility to deliver district heating, particularly in Cork City Docklands, Tivoli Docklands and the Cork Science and Innovation Park. However due to the current climate in Ireland where summer temperatures are rising every year and the demand for air conditioning is emerging, it would be beneficial to consider if there is a reasonably constant heat source that could be used for heating in Winter and cooling in Summer.

The implementation of the Digital Strategy for the City is of utmost importance in the city, and this plan must ensure that a plan is in place to invest in the delivery of accessible and improved high speed, high-capacity digital infrastructure and rollout of the National Broadband Plan. As part of the Digital Strategy for the City the potential of data centres must be explored. The development of and requirement for data centres is a valuable part of the modern economy and an area with the generation capacity of Cork is ideally positioned to facilitate an appropriate volume of data centres, that can bolster current economic activity and investment. Commercial areas such as Little Island, act as ideal locations for such activity. This development plan must cater for this potential in the city region.

Strategic Objectives 9: Placemaking and Managing Development

Holistic and connected placemaking and transport mobility will be key to ensuring Cork remains a competitive and quality of life oriented location for talent and investment. As Ireland's second City, Cork also has a hugely significant role to play in the climate resilience of the country. The areas where Cork can make visible and globally noteworthy progress are in its built and mobility fabric and by enabling its natural energy resources and renewable energy production capacity. Quality of life, economic, resilience and sustainability are as one.

Placemaking is a central focus of this plan and it will be an essential part of building resilience into the future as our public spaces are reimagined and a strong connection is established between them and the local community.

Cork Chamber supports the plan's objective to deliver sustainable residential development with an emphasis on the promotion of a mix of land uses to minimise transport demand. This will be facilitative of the '15 minute city' concept and will help to reduce the amount of single use vehicles and daily commute times.

The dwelling size mix requirement is an objective that is also to be welcomed as it will cater for different types of households. Under the plans purpose-built student accommodation schemes will be exempt from dwelling size mix targets and this is appropriate to facilitate the growth of both UCC and MTU.

The plan focuses on high quality residential developments with factors such as daylight, sunlight, overshadowing and private amenity space for houses taken into account. It is vital that any new builds are aesthetically appealing as well as fit for purpose. This will increase the attraction of the city as a place to live and work which will increase the available talent pool.

Cork Chamber would take this opportunity to call for a greater focus on above-shop living. There is currently a great deal of vacant space above shops in city centre buildings that could be used for accommodation purposes and could breathe new life into the city. The plan should support the concept of more facilitative standards for delivery such as reduced private open space, parking and unit size to facilitate the re-use of upper floors and the creation of additional homes. This urban fabric is built, and its repurposing must be enabled. However more needs to be done to encourage the owners of these buildings to convert these spaces. Consideration should be given to a vacancy levy to incentivise the conversion of upper floor apartments.

Dereliction and vacancy is an issue faced by all urban areas, however it is essential that every conceivable step is taken, through this plan, and the initiatives that will support it, to ensure that it is minimised, bringing properties into productive use.

It is critical that Cork city is an inclusive and accessible city that meets the needs of its citizens and facilitates the integration of all different sections of society. It is therefore positive to see provisions made for traveller accommodation, age friendly and supported living housing and older persons and specialist and supported living accommodation.

Conclusion

This Development Plan takes place at a unique time, in the wake of a pandemic, yet in the midst of a positive policy context with endorsements from the NPF, to the NDP and CMATS. It is essential that it is facilitative of creative solutions and that it is mindful of market realities, viability and delivery. Quality of life, housing, sustainability, economic and social change will be dominant topics for its duration, and it is essential that progress is made on all fronts.

Cork Chamber look forward to working with Cork City Council to deliver a successful outcome for Cork, and are available at all times for consultation, discussion and support.