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**RE: Proposed Amendments to the Draft Cork City Development Plan 2022-2028**

**SRA File Ref: 20/003**

A Chara,

I refer to your notice of the publication of Proposed Amendments to the Draft Cork City Development Plan 2022-2028. The Southern Regional Assembly (SRA) welcome this opportunity to comment on the Proposed Amendments.

The SRA commend the continued work undertaken in the preparation of the Draft Plan. These observations are focused solely on the published material amendments and are intended to assist the Council in achieving successful alignment of the City Development Plan with the Regional Spatial and Economic Strategy (RSES), Cork Metropolitan Area Strategic Plan (MASP) and National Policy Objectives.

The SRA have identified one key recommendation for the Proposed Amendments regarding the Core Strategy (Volume 1) and Mapped Objectives (Volume 2) which we set out in Section 1.0.

The SRA have demonstrated support for other Proposed Amendments, alignment to the objectives of the RSES and Cork MASP and where the recommendations of the SRA's submission to the Draft Plan have been addressed in Section 2.0.

## Section 1.0 Core Strategy and Mapped Objectives

### 1.1 Proposed Amendments Impacting the Achievement of Compact Growth Targets

A key strength of the Draft Plan Core Strategy is the evidence-based distribution of growth to achieve housing in alignment to the NPF and RSES including delivery within the existing built up footprint of the city at a higher rate than greenfield sites at the edge of the city or in the hinterland. This ensures that Cork will deliver on the requirement for compact growth across the city and metropolitan area which is a precondition if the transformative transport services and infrastructure planned through the Cork Metropolitan Transport Strategy (CMATS) are to be achieved.

Project Ireland 2040, the NPF and RSES targets Cork to grow by over 50% to 2040 as part of a structural realignment away from the Greater Dublin Area with a 50:50 distribution of growth between the Eastern and Midlands region and the Southern and Northern and Western Regions. Achieving such ambitious targets will require an equally ambitious re alignment in funding priorities and service delivery by government to the Cork area. It also requires the City Council to demonstrate through the Development Plan that it has put in place evidence-based measures that warrant significant public investment to achieve the ambitions for change set out in the NPF.

The City Capacity Study informed the Core Strategy and assessed the capacity of Cork City for future development within existing underutilised zoned lands, which includes a combination of greenfield, brownfield and infill sites within the built-up footprint.

The study provided an evidence base for the identification of Tier 1 zoned land that is serviced and Tier 2 zoned land that is serviceable within the life of the Plan informing the required level of land use zoning for residential use in Cork City Council to meet targets set out in the NPF for the plan period 2022 – 2028 .

Draft Plan Core Strategy Table 2.5 demonstrated that the potential residential output from Tier 1 and Tier 2 lands within the built-up footprint can deliver 64.7% of the total housing output to 2028. Residential output from Tier 1 and Tier 2 lands from greenfield sites can deliver 35.3% of the total output.

This distribution is a clear demonstration of delivering compact growth and accords with RSES RPO 35 Support for Compact Growth requiring local authorities through the Development Plan to identify evidence-based rejuvenation priorities in accordance with the National Strategic Outcome for Compact Growth and require a transitional minimum requirement to deliver **at least** half (50%) of all new homes targeted within the Cities and Suburbs including Cork to be within their existing built up footprints in accordance with NPF National Policy Objective 3b. This will be **evidence based** on availability and deliverability of lands.

Recommendation No 2 of the SRA's submission to the Draft Plan had sought to strengthen the Core Strategy further as follows:

- It is important that the distribution and phasing of growth is infrastructure led and adheres to Cork MASP Objective 7 which requires the Core Strategy to allocate the distribution of future population and employment growth with the integration of land use and transportation planning principles. Locations not accessible by existing or planned Light Rail Corridor, Suburban Rail Corridor, strategic bus network corridors

and with high levels of accessibility by public transport (as identified in the Core Strategy and Chapter 10 Key Growth Areas) need to be closely evaluated to ensure Cork MASP Objective 7 has been complied with in the Core Strategy distribution and to ensure the objectives of CMATS are achieved (Cork MASP Objective 8).

- The level of detail (evidence) in identifying enabling infrastructure packages and phasing for infrastructure led growth varies across different strategic growth locations. A review of the objectives for strategic sites and Key Growth Areas should integrate summaries of the key infrastructure packages and actions needed by stakeholders to deliver phased, infrastructure led (physical and social) growth.

**Proposed Amendment 1.26 and 1.27** update Table 2.3 Growth Strategy 2028 and provides a single core strategy table for each tier across the settlement hierarchy as a combination of existing Tables 2.2, 2.3 and 2.4 of the Draft Plan.

The new Core Strategy Table demonstrates a notable change in the distribution of growth, with the output from Tier 1 and Tier 2 lands within the built-up footprint reduced to 51.6% while the output from Tier 1 and Tier 2 lands from greenfield sites increased to 48.4%.

There is concern that Proposed Amendments 1.26 and 1.27 and associated zonings in Volume 2 (Mapped Objectives) do not address Recommendation No 2 of the SRA's submission to the Draft Plan where the cumulatively increased residential yield on edge lands in greenfield locations and the ratio of greenfield locations for residential development have:

- Reduced the compact growth targets set at Draft Plan stage and reflected in the Core Strategy tables
- Increased without an evidence-based approach to their selection, without demonstrated land use and transport planning integration (essential if Cork is to deliver the consolidation needed to deliver CMATS) and without indication of other infrastructure and service requirements.

These amended zonings require a re-evaluation by the Council as they appear at conflict with the Nine Strategic Objectives for Growth guiding the Core Strategy, especially SO1 for Compact Liveable Growth. The following are noted as examples:

- Proposed Amendments from City Hinterland to allow for residential uses: Zoning Amendments 2.6, 2.8, 2.9, 2.24, 2.28, 2.32, 2.51, 2.57, 2.60, 2.61, 2.69, 2.70, 2.74, 2.78, 2.85, 2.95, 2.97.
- Proposed Amendments from Public Open Space to allow for residential uses: Zoning Amendments 2.3, 2.25, 2.33, 2.49, 2.55, 2.65, 2.66, 2.67, 2.68, 2.76, 2.94.
- Proposed Amendments omitting or changing from Areas of High Landscape Value or Landscape Preservation Zones to allow for residential uses: Zoning Amendments 2.4, 2.62, 2.72, 2.73.

These zoning amendments also need to be assessed so they do not contradict the sustainable principles underlying other proposed amendments to the Draft Plan. One important example is Proposed Amendment 1.135 regarding Draft Plan Objective 6.17 Open Space Strategy which commits to preparation of a citywide Open Space Strategy during the life of the plan to provide an excellent network of open spaces to meet the needs of its residents and identify existing, emerging and future GBI route networks within the city's neighbourhoods, urban towns and hinterland area. This objective aligns with Cork MASP Objective 17 Metropolitan Open Space,

Recreation and Greenbelt Strategy encouraging such networks metropolitan wide and requiring the development of a metropolitan greenbelt strategy. Proposed amendments that remove open space zonings and Landscape Preservation Zones are premature of such strategies and assessments being completed under Development Plan implementation.

Other examples where proposed zoning amendments could contradict other important amendments to deliver the Strategic Objectives for Growth in the City include:

- Consolidation to achieve successful 15 Minute City Neighbourhoods (Proposed Amendment 1.35).
- Ensure zoned and serviced land located close to employment, community, transport and education services continues to be available to meet the city's housing requirements (Proposed Amendments 1.45 and 1.46).
- Delivery of key transport projects in CMATS will be supported by land use policy and phasing of development which is compatible with those in CMATS land use outcomes (Proposed Amendment 1.99).

Other proposed zoning amendments put forward in Volume 2 which a warrant further consideration for adherence to the Strategic Objectives for Growth under the Core Strategy include:

- Proposed Amendments omitting Light Industry to allow for residential uses such as Zoning Amendments 2.91, 2.92 for adherence to compact growth targets.
- Proposed Amendments requiring a justification on the ability to service lands and deliver the required level of infrastructure over the lifetime of the plan period (Zoning Amendment 2.99) .

## **1.2 Recommendation**

Proposed Amendments 1.26, 1.27 and a number of Zoning Amendments in Volume 2 as outlined in Section 1.1 cannot be fully supported under the RSES and Cork MASP where cumulatively they have increased the extent of residential yield on edge of centre greenfield lands relative to the sustainable targets achieved on lands within the existing footprint of the city as identified by the City Council, without a demonstrated evidence-base, outside the findings of the City Capacity Study, without alignment to land use and transport planning integration and premature of a City Open Space Strategy. The reduced target for compact growth erodes the achievement of consolidation to support sustainable higher density development that supports the implementation of transport infrastructure and services under the CMATS. The amendments have not strengthened the Core Strategy as required by Recommendation No 2 of the SRA's submission on the Draft Plan and have potential to reverse the intended sustainable impact of other important proposed amendments in pursuit of Draft Plan SO1 Compact Liveable Growth. The amendments as outlined above are not therefore fully aligned with RSES RPO 10 Compact Growth in Metropolitan Areas, RPO 35 Support for Compact Growth, RPO 151 Integration of Land Use and Transport and Cork MASP Objectives 7 Integrated Landuse and Transport Planning and Objective 17 Metropolitan Open Space, Recreation and Greenbelt Strategy.

## Section 2.0 Support for Proposed Amendments to Development Plan Volume 1 Chapters Aligned to the RSES and Cork MASP

### 2.1 Introduction

**Proposed Amendment 1.4** commits to the implementation of the Cork Metropolitan Area Transport Strategy (CMATS) at the outset of the City Development Plan for the planning and delivery of transport infrastructure and services to support the Metropolitan Area's development in the period up to 2040. It states the importance of this framework for the alignment of investment priorities between Cork City Council, Cork County Council, transport agencies and other stakeholders for co-ordinated land use planning, transport investment and the delivery of housing and employment development. This amendment is welcomed and aligns with RSES RPO 151 Integration of Land Use and Transport, RPO 164 Metropolitan Transport Strategies, Section 6.3.6.3 Transport Priorities for the Cork Metropolitan Areas and Cork MASP Objectives 7 (Integrated Land Use and Transport Planning) and 8 (Key Transport Objectives) and Sections 7.0 Housing and Regeneration and 8.0 Employment and Enterprise for the Cork Metropolitan Area.

### 2.2 Core Strategy

**Proposed Amendment 1.11** places a strengthened focus on employment led growth within the Core Strategy. It sets an estimated target for approximately 35,000 new jobs generated by the planned population growth targets of 125,000 additional people by 2040. An estimated breakdown of these jobs by sector is set out. In the provision of zoned lands for enterprise growth, a stated policy is to target enterprise growth in neighbourhoods where there are relatively high levels of unemployment, creating inclusive and sustainable communities and anticipating likely market trends over the period to 2028. In some locations, such as the North Western suburbs, there is a jobs shortfall in the allocation of employment land. It is intended to identify further employment lands that can fulfil the target jobs requirement. The SRA welcome initiatives of the city council that provide an evidence-based approach for the distribution of employment lands in the city council area aligned with transport planning and implementation of the CMATS.

This amendment is supported and aligns with RSES RPO 2 Planning for Diverse Areas and Section 3.2 Sustainable Place Framework and 3.3 A Tailored Approach which supports employment led growth, RPO 10 Compact Growth in Metropolitan Areas, the principles of RSES Chapter 4 A Strong Economy including support for placemaking for enterprise development, support for Cities and Metropolitan Areas as drivers of economic growth and RPO 62 Locations for Employment Development. Cork MASP Objectives 1 and 2 support infrastructure led population and employment growth in the city and metropolitan area with Section 8.0 supporting the distribution of employment growth and development of strategic employment locations to be infrastructure led, especially aligned with transport infrastructure planning (Cork MASP Objective 12 Infrastructure for Strategic Employment Locations).

**Proposed Amendment 1.25** clarifies that former Tier 3 categorised lands in the Draft Plan are now classified as longer-term strategic development lands, required beyond this Plan period to fulfil the City's ambitions in achieving the growth targets for 2040. These lands are not zoned and are not included in Core Strategy calculations. They are unlikely to be serviced during the lifetime of this Plan. These lands are identified as long-term strategic sites needing long term planning and service delivery. They are identified to ensure active land management

by safeguarding and strategically planning for the longer-term growth. Table 2.4 details the location and quantum of longer-term strategic development lands within the city.

Under Chapter 12 Land Use Zoning , **Proposed Amendment 1.340** further clarifies the intent of Longer-Term Strategic Development Land.

The identification of longer-term strategic development lands is supported by the SRA. This accords with RSES Section 3.2 which recognises that it will require several Development Plan cycles to achieve the lead in time required for infrastructure to achieve our targets. It also accords with RPOs 7-9 for funding and infrastructure delivery in metropolitan areas, Cork MASP Objectives for investment and enabling infrastructure (Objectives 5 and 6) and priorities for strategic residential and regeneration areas and strategic employment areas, which require co-ordination between stakeholders to deliver enabling infrastructure over the short, medium and longer term.

**Proposed Amendment 1.35** strengthens the commitment to delivering for sustainable 15 -Minute City neighbourhoods as an outcome of the City Development Plan. Additional text commits to achieving Compact Liveable Growth by creating vibrant local communities that can access all necessary amenities within a 10- minute walk/cycle and access workplaces and other neighbourhoods with a 15-minute public transport journey. Implementation will include walkable neighbourhoods, towns and communities with mix of uses, house types and tenure that foster a diverse, resilient, socially inclusive and responsive city. This includes support for public and active travel infrastructure projects and services and enhanced neighbourhood permeability. Strategic infrastructure and large-scale developments shall demonstrate how they contribute to a 15-minute city and enhance Cork City's liveability and accessibility.

This amendment is supported by RSES RPO 31 Sustainable Place Framework, RPO 35 Support for Compact Growth, transport and mobility RPOs 151 Integration of Land Use and Transport, RPO 152 Local Planning Objectives, RPO 160 Smart and Sustainable Mobility, RPO 162 Multi-Modal Travel Integration, RPO 165 Higher Densities and RPO 174 Walking and Cycling. The amendment is especially welcomed for delivering progress in the Region under RPO 176 10 Minute City and Town Concepts where it assists the implementation of the RSES in the promotion of actions for sustainable mobility, low carbon transport and uptake of recommendations through our 10 Minute Towns Accessibility and Framework Report (accessible on our website <https://www.southernassembly.ie/regional-planning/rses-implementation/10-minute-towns>).

The following three amendments strengthen support for achieving compact growth targets in the city and metropolitan area.

- **Proposed amendment 1.45** is an addition to Objective 2.28 (Supply of Zoned Land) to monitor and review the Core Strategy to ensure that sufficient zoned and serviced land, located close to employment, community, transport and educational services, continues to be available to meet the City's housing requirements over the lifetime of the Plan.
- **Proposed Amendment 1.47** provides a new objective to designate Urban Development Zones (UDZ) under Government policy Housing for All. Designated UDZs in the city will focus on transport orientated development, integrating with the existing city and neighbourhoods (consolidation), planning and delivery of physical and community infrastructure and delivering Compact Growth.

- **Proposed Amendment 1.48** provides a new objective to advance active land management initiatives, infrastructure delivery and regeneration projects through a framework plan for the central city area. A key feature of the framework approach will be strengthening connectivity between regeneration areas focused on public transport and active travel including Bus Connects Cork, the proposed LRT route and the emerging Lee to Sea Greenway. Support is also included for water-based transport and mobility. A strong emphasis is placed on land use and transport planning coordination, green and blue infrastructure provision, built heritage and conservation, enhancing biodiversity and achieving high quality placemaking.

These amendments are supported by RSES RPO 4 Infrastructure Investment, RPOs 7-9 for delivering infrastructure for planned growth in the metropolitan area, RPO 10 Compact Growth in the Metropolitan Area, RPO 31 Sustainable Place Framework, RPO 34 Regeneration, Brownfield and Infill Development and RPO 35 Support for Compact Growth. Support for transport orientated development is aligned to RPO 151 Integration of Land Use and Transport requiring residential and employment development in locations highly accessible by public transport and active transport modes. Integrating important themes to strengthen biodiversity, blue and green infrastructure networks and to protect and enhance cultural heritage as central aims of the city's regeneration initiatives are welcomed and demonstrates a holistic approach to regeneration and achieving liveable compact growth. These themes cross several RPOs, some examples include RPO 124 Green Infrastructure, RPO 126 Biodiversity and RPO 203 Revitalisation of Historic Cores.

These amendments also align to Cork MASP Objectives 1 and 2 for consolidation and infrastructure led growth for the city and metropolitan area, Objectives 5 and 6 for delivering holistic infrastructure and Objective 7 Integrated Landuse and Transport Planning.

The following three amendments address Recommendation No 1 of the SRAs submission to the Draft Plan which advised strengthened content for the role of the Cork Metropolitan Area as a primary driver of growth within the Region:

- Proposed Amendment 1.49 provides a new objective stating Cork City Council shall support and encourage development proposals that strengthen Cork City's role as a national and regional economic driver, and that contribute to a strong, resilient, diverse and innovative economy for the City, as envisaged in national and regional planning policy.
- Proposed Amendment 1.51 provides an additional new objective to deliver compact liveable growth in Cork City that enables the City to increase its role as a primary national and regional driver and increase the achievement of regional parity in accordance with NPO 1a of the NPF and RPO 6 of the RSES for the Southern Region.
- Proposed Amendment 1.52 provides an additional new objective specifically for Regional Collaboration and supports regional interactions including improved transport and digital connectivity, in accordance with Cork MASP Objective 4 of the RSES for the Southern Region.

The SRA welcomes these amendments, which support cross regional economic interactions and the potential for shared initiatives and project collaboration between cities and metropolitan areas which will drive regional parity and balanced regional development, especially growth of the cities in the Southern Region as a counter pole to Dublin in line with



National Planning Framework (NPF) policies and RPO 6 Collaboration between Metropolitan Areas.

Amendments 1.49, 1.51 and 1.52 also support the position of Cork City and the Metropolitan Area as a primary driver of growth for the Region through Development Plan objectives and implementation. This role is identified through the spatial and economic strands of the RSES and it is important to see this role defined and progressed through Development Plan implementation. The amendments are especially aligned to RPO 2 Planning for Diverse Areas, Table 3.2 Settlement Typology of the Region, RPOs 28-30 Inter-Urban Networks as Regional Drivers, RSES Section 4.4 Our Region's Economic Engines, Cork MASP Objective 1 Cork Metropolitan Area, Objective 2 Cork City and Objective 4 Cork Metropolitan Area Regional Interactions.

**Proposed Amendment 1.50** addresses Recommendation No 3 of the SRAs submission to the Draft Plan which advised a new objective in support of coordination with the Land Development Agency (LDA) to open strategic landbanks for masterplan led regeneration and housing delivery. The new objective affirms that Cork City Council will work with relevant stakeholders including the LDA to enable the development, renewal and regeneration of suitable state-owned lands as potential key deliverables to achieve NPF growth targets. The SRA welcome this objective and encourage initiatives through it at implementation stage in alignment with RSES RPO 10 Compact Growth in Metropolitan Areas, RPO 34 Regeneration, Brownfield and Infill Development and RPO 36 Land Development Agency.

## 2.3 Delivering Homes and Communities

**Proposed Amendment 1.55** strengthens commitment to collaborative working, equality and inclusivity in delivering homes and communities and to deliver on the objectives of the Cork MASP. This amendment is welcomed for integrating the importance of delivering the objectives of the Cork MASP through Development Plan actions and encouraging project partnerships to achieve this. The amendment aligns with Cork MASP Objectives and Objective 22 Social Inclusion especially.

**Proposed Amendment 1.56** addresses Recommendation 1c of the SRAs submission to the Draft Plan which advised to include specific support for the role of Cork City as a Gaeltacht Service City under the Gaeltacht Act 2012 in alignment with Cork MASP Objective 4. In response, a new paragraph of text will be inserted under the section 'A Diverse and Inclusive City' stating that Cork City Council support the development of a Language Plan and 'Gaeltacht Service City' designation and recognise the cultural, economic and social benefits for Cork City. This inclusion is welcomed and aligns with RSES RPOs 195 and 196 in support of the work and role of Údarás na Gaeltachta in developing the cultural and linguistic heritage of Gaeltacht service towns and cities and strengthening their economic functions and aligns with Cork MASP Objective 4 in support of a role for Cork City as a designated Gaeltacht service centre.

**Proposed Amendment 1.68** strengthens the Development Plan's commitment to supporting education and training through further education and higher level education sectors and facilities in the Council area and states the City Council will work with the educational institutions and the Department of Further, Higher Education, Research and Skills



to achieve sustainable growth of the sector. Additionally, **Proposed Amendment 1.79** commits to:

- Support University College Cork in delivering the University College Cork Masterplan Review 2021 and the Munster Technological University in delivering the MTU Masterplan Review 2021.
- Support investment in strategic national innovation enabling assets within the city, specifically the expansion of Tyndall National Institute to the North Mall and the development of UCC's new Cork University Business School in the City Centre.
- To work with the education providers and the Department for Further, Higher Education, Research and Innovation to ensure that facilities can be upgraded and expanded to meet their requirements.

Further, **Proposed Amendment 1.84** states that Cork City Council will work with third-level education providers in relation to their development and expansion in a sustainable manner and will work with stakeholders to examine the potential of a Cork City Third-Level Education Expansion Strategy and Impact Assessment.

The SRA support these additions which respond to Recommendation 11 (a) to develop skills, education, training and lifelong learning initiatives in Cork City including support for Cork as a UNESCO City of Learning and the SRA's initiative Towards a Learning Region. The amendments support the development of knowledge diffusion, a key pillar of the RSES economic strategy and support for economic resilience and growth and are aligned to RPO 63 Skills and Talent, RPOs 186-190 for education, skills and support to higher and further education sectors and Cork MASP Objectives 10 Enterprise Support, Education and Access to Talent and Objective 20 Lifelong Learning and Skills.

Regarding support for new school facilities as a key infrastructure to service population and housing growth, the SRA welcome **Proposed Amendment 1.78** which commits the City Council to work closely with the Department of Education and Skills and landowners to ensure that new schools are provided to meet the needs of new residential neighbourhoods at: City Docks; Tivoli Docks; Ballincollig Maglin; Ballyvolane; South Glanmire; Blarney (Stoneview); Kilbarry / Blackpool Neighbourhood; and Douglas (Castletreasure). This commitment aligns with RSES RPOs 7-9 for holistic infrastructure investment to the City and Metropolitan Area to service growth, RPO 177 Childcare, Education and Health facilities, RPO 185 New School Facilities and ensures school provision is progressed as a key infrastructure to facilitate strategic residential and regeneration areas as supported by the Cork MASP.

## **2.4 Transport and Mobility**

There are several positive amendments proposed that address Recommendation No 5 of the SRA's submission to the Draft Plan to strengthen transport and mobility objectives. The SRA note the following:

- **Proposed Amendment 1.87** sets an ambition of Cork City Council, to exceed the targets set for sustainable transport modes in the Cork Metropolitan Transport Strategy (CMATS) and commit to a modal share target for cycling of 10%.
- **Proposed Amendment 1.88** further states it shall be an ambition of this plan to increase the modal share for cycling within the City administrative area to 10% to be achieved through a consequent reduction in the number of car journeys.

- **Proposed Amendment 1.89** strengthens the commitment to implement CMATS as supported in the RSES through partnership between the National Transport Authority, Cork City Council, Cork County Council and Transport Infrastructure Ireland.
- **Proposed Amendment 1.90** states Cork City Council will work with the National Transport Authority on the implementation of CMATS and commits to incrementally deliver the specified transport infrastructure interventions and public transport services to align with the continued growth of the City and wider Metropolitan Area. CMATS is supported as a live document, subject to periodic review and is intended to be scalable, flexible, and future proofed enough to meet changes in population and employment growth. Any such changes will still need to be consistent with the principle of compact growth and public transport- oriented development.
- **Proposed Amendment 1.93** support the development of the LRT, and to allow the development consolidation to support its delivery, the selected route will be served with a high frequency bus service with bus priority measures to enable a high level of performance in advance of its transition to light rail.
- **Proposed Amendment 1.94** supports inter-city rail and in addition to improvements in the Cork-Dublin service, Cork City Council supports the development of an enhanced direct and frequent rail service between Cork and Limerick.
- **Proposed Amendment 1.98** supports the Five Cities Traffic Demand Management (TDM) Study which will help Cork City Council to better understand what drives transport demand and how a greater shift to more sustainable and healthier forms of travel can be encouraged in the city. The City Council will work to implement complementary demand management policy at both a strategic city- wide level and at a more micro level where it will assist in the preparation of local framework plans. A Transport Demand Management (TDM) Study will set out a roadmap for a better future for all those visiting, living, working and studying in the city.
- **Proposed Amendment 1.99** affirms the delivery of the key transport projects in CMATS will be supported by land use policies and the phasing of development which is compatible with those in CMATS' land use outcome.

These amendments are supported in turn by the Draft Plans positive support for local mobility hubs. These amendments are supported and align with RSES RPO 151 Integration of Land Use and Transport, RPO 152 Local Planning Objectives, RPO 160 Smart and Sustainable Mobility RPO 162 Multi Modal Travel Integration, RPO 163 Sustainable Mobility Targets, RPO 164 Metropolitan Transport Strategies, RPO 165 Higher Densities, , Section 6.3.6.3 Transport Priorities for the Cork Metropolitan Areas and Cork MASP Objective 1 Cork Metropolitan Area, Objective 7 (Integrated Land Use and Transport Planning) and 8 (Key Transport Objectives) and Sections 7.0 Housing and Regeneration and 8.0 Employment and Enterprise for the Cork Metropolitan Area.

The SRA supports the steady state maintenance , strengthening of our road infrastructure and delivery of strategic road projects as identified in the NDP and RSES to service public transport, economic movement of goods between our urban centres , ports and airports, essential services and assists the regeneration of urban centres. The following amendments are noted in support of strategic projects which are important to deliver on NPF and RSES outcomes for strengthened regional connectivity and include:

- **Proposed Amendment 1.96** supports the N/M20 Cork to Limerick Project as a major enabler for balanced regional development, to provide better connectivity between the Region's cities and enable safer and more efficient journey times. In addition to road-based improvements, a series of rail-based improvements are also being examined and are supported for strengthened multi-modal connectivity between the cities.
- **Proposed Amendment 1.100** supports the Northern Distributor Road and Southern Distributor Link Road.
- **Proposed Amendment 1.102** proposes a new objective to protect the strategic transport function of national roads through the implementation of the 'Spatial Planning and National Roads Guidelines for Planning Authorities' DECLG, (2012) and the Trans-European Networks (TEN-T) Regulations.
- **Proposed Amendment 1.103** proposed a new objective to safeguard the carrying capacity, operational efficiency and safety of strategic national roads.

These amendments are supported and align with RSES RPO 153 Capacity of Inter-Urban Road Connections, RPO 156 Steady State Investment, RPO 166 Investment in Strategic Inter Regional Multi-Modal Connectivity to Metropolitan Areas and Economic Corridors, RPO 167 National Road Objectives, RPO 169 Strategic Road Network Improvement Priorities, RPO 170 Rail and Cork MASP Objective 9 Strategic Road Network Improvements.

**Proposed Amendment 1.101** addresses Recommendation No 5 for strengthened transport and mobility objectives regarding smarter and sustainable transport initiatives and Recommendation 6 to provide an objective under Transport and Mobility for 15 Minute City Neighbourhoods under the SRAs submission to the Draft Plan. The amendment strengthens Objective 4.4 to support the 15-minute city concept and walkable neighbourhoods with adequate walking and cycling infrastructure connected to high quality public realm elements, including wayfinding and supporting amenities, support the expansion of the Cork Bikes scheme, to accommodate other innovations such as electronic bikes, public car hire, and other solutions that will encourage active travel, support the rollout of the NTA 5 Year Cycle Plan and to support and engage with the Safe Routes to School programme.

This amendment is supported and aligns to RSES RPO 160 Smart and Sustainable Mobility, RPO 161 Smart Mobility, RPO 162 Multi-Modal Travel Integration, RPO 174 Walking and Cycling and RPO 176 to deliver 10 Minute City and Town Concepts.

**Proposed Amendment 1.97** strengthens the City Council's commitment to Waterborne Mobility and states supports innovative waterborne alternatives which may present an opportunity to complement already existing and proposed land-based public transport and other sustainable mobility modes. Cork City Council considers that waterborne mobility has the potential to become an effective complementary link in the Metropolitan Transportation system.

This amendment is supported by the SRA and aligns to RSES RPO 160 Smart and Sustainable Mobility which includes provision to support and investigate the feasibility of sustainable water transportation services for Cork Harbour, Shannon Estuary and Waterford Harbour.

## 2.5 Climate Change and Environment

The SRA note and welcome the following proposed amendments to the Draft Plan which strengthen commitments to achieving carbon emission reduction and greater uptake of renewable energy sources to supply future growth.

**Proposed Amendment 1.108** commits to collaboration with Sustainable Energy Authority of Ireland (SEAI), the Southern Regional Assembly (SRA), the Climate Action Regional Office (CARO), Energy Cork and leading specialists including universities and communities to implement energy efficiency and renewable energy actions across the City.

**Proposed Amendment 1.110** provides additional scope for renewable and low carbon energy generation. The amendment states the Development Plan promotes the generation and supply of low carbon and renewable energy alternatives. NZEB homes and passive non-residential developments will have an important role to play in carbon reduction measures. Roof level solar banks are already a feature in new and retrofitted buildings in the City and will be an important part of the solution to achieving low carbon and carbon neutral developments. Micro-renewable wind energy generation has a part to play in reaching targets, and potential may exist for on-site and micro wind energy production in industrial areas and business parks subject to the requirement to protect residential amenity in surrounding areas. Through this amendment, support is also offered for offshore wind energy facilities and where appropriate, Cork City Council will also seek to facilitate infrastructure such as grid facilities on the land side of any renewable energy proposals of the offshore wind resource, in accordance with the principles of the National Marine Planning Framework.

**Proposed Amendment 1.111** supports District Heating distribution networks and commits that in accommodating more compact and sustainable patterns of development, Cork City Council will assess the feasibility to deliver district heating across the City. Future growth areas which may be compatible to District Heating systems include, but are not restricted to, the Cork City Docklands, Tivoli Docklands and the Cork Science and Innovation Park.

**Proposed Amendment 1.112** adds additional support to Geothermal Energy, the potential for geothermal resources for small and medium-scale heating applications and support for the national roadmap to develop Geothermal Energy potential.

The SRA welcome the proposed amendments which strengthen the commitment of the City Council through implementation of the Development Plan climate action and achievement of lower carbon emissions, especially for low carbon energy usage and renewable sources and lower carbon transportation. The amendments align with RSES RPOs 87-90 for low carbon energy future and regional decarbonisation, RPOs 95-101 for renewable energy and RPOs 105-108 for energy efficiency, retrofitting and district heating initiatives. The amendments also support RSES Section 8.2 Strategic Energy Grid and RPOs 219-224 for new energy infrastructure, integrating renewable energy sources to the distribution grid and support for local and micro renewable energy production.

## 2.6 Green & Blue Infrastructure, Open Space and Biodiversity

The SRA welcome amendments to Chapter 6 in support of developing a network of Green Blue Infrastructure (GBI) corridors and enhancing biodiversity and recreation amenities as an integral feature of the regeneration and growth strategy for the City Council area. These include:

- **Proposed Amendment 1.113** adds additional support to Green Blue Infrastructure (GBI) corridors where it states GBI provision is not limited to traditional green spaces such as parks and other open spaces but can involve various interventions to thread nature into streetscapes or provide corridors of connectivity between GBI assets.
- **Proposed Amendment 1.122** supports the creation of a multi-use maritime activities and recreation hub in the Marina along the River Lee. The hub shall enhance the recreational, natural and cultural heritage value of the River Lee by improving access, activities and use of the water including water-based leisure activities. The hub will also offer a co-location opportunity for shared community, enterprise, recreation and open space infrastructure .
- **Proposed Amendment 1.132** integrates the delivery of 15 Minute Neighbourhoods with opportunities for GBI stating the Council will encourage urban greening at the neighbourhood scale, transforming existing grey, hard-surfaced spaces into green, natural environments projects, creating an enhanced walking experience for local residents as well as increased access to green and blue infrastructure.

These amendments are aligned with RSES RPOs that promote GBI as a key component of placemaking. They are positive examples of supporting the multiple benefits and value of GBI delivery for achieving the sustainable outcomes of the Development Plan. The amendments are especially relevant for the SRA's work in the promotion of a GBI and Nature Based Solutions Framework for the Southern Region through the EU Interreg Blue Green Cities Project, been created as a key action of RSES implementation. They are aligned with RSES RPO 124 Green Infrastructure, RPO 125 Green Infrastructure Corridors, RPO 126 Biodiversity, RPO 174 Walking and Cycling, RPO 176 10 Minute City and Town Concepts and RPO 200 Green Infrastructure and Recreation.

**Proposed Amendment 1.135** amends Objective 6.17 Open Space Strategy stating the strategy shall include the identification of existing, emerging and future GBI route networks within the city's neighbourhoods, urban towns and hinterland area. The objective is strengthened to reference existing, emerging and future GBI route networks and an extension of the wider metropolitan GBI network. The SRA welcome this amendment and through Development Plan implementation it can be further strengthened to extend the initiative metropolitan wide in collaboration with Cork County Council in alignment with Cork MASP Objective 17 Metropolitan Open Space, Recreation and Greenbelt Strategy as supported by Recommendation No 9 of the SRA's observation to the Draft Plan.

## **2.7 Economy and Employment**

**Proposed Amendment 1.143** qualifies the need to identify 228 ha of employment lands to accommodate office, manufacturing and light industry needs (Strategic Employment Land Survey) will require the decanting of existing uses to new greenfield sites. This is critical to realise National and Regional Policy Objectives in the delivery of ambitious large-scale regeneration projects for the provision of new employment, housing and supporting infrastructure in Cork Docklands and other strategic areas, and realising the ambitious growth targets for the City as a regional driver of future development.

**Proposed Amendment 1.145** address Recommendation No 8 of the SRA's submission to the Draft Plan which advised that reference should be included on the opportunity for Cork City through a Cork Harbour Planning Framework Initiative, the preparation of which is a

requirement under RSES objective 79 and Cork MASP Objective 3 Cork Harbour. Accordingly, this amendment provides new text stating the competing issues and trans-boundary nature of Cork's Maritime and Harbour economy requires collaboration as part of A Cork Harbour Planning Framework Initiative, as per RSES Objective 79 and Cork MASP Objective 3 Cork Harbour. Cork City Council is committed to part-take as a key stakeholder and consultee in the preparation of this framework. Further, **Proposed Amendment 1.166** includes a new Objective 7.37 Cork Harbour Planning Framework stating Cork City Council is committed to part-take as a key stakeholder and consultee in the preparation of a Cork Harbour Planning Framework Initiative, in coordination with other Local Authorities and stakeholders in the harbour area, as required under RSES Objective 79 and Cork MASP Objective 3 Cork Harbour, during the lifetime of the Plan. These amendments have positively addressed SRA's recommendation.

**Proposed Amendment 1.148** addresses SRA Recommendation No 11 in support of a Learning Region where it was advised that in addition to Draft Plan objectives to develop skills, education, training and lifelong learning initiatives in Cork City including support for Cork as a UNESCO City of Learning, it is recommended that the Plan include a strengthened reference to the Learning Region Action Plan (RSES RPO 190) , prepared by the SRA in consultation with stakeholders as part of RSES implementation, and opportunities for collaboration between stakeholders to spread learning city initiatives throughout the metropolitan area and wider region. According, the amendment provides additional text stating in a wider regional context, Cork City is working with both Limerick and Waterford to finalise A Learning Region Action Plan for the region as part of its commitments under RSES. The implementation of this report will support increased investment for education and training providers in our Region and enhance the City Council's unique proposition as a Learning City and Region. The amendment is welcomed and addresses the SRA's recommendation. It should be noted that as the SRA's work on RSES implementation advances, the initiative referenced as a Learning Region Action Plan has evolved to be termed Towards a Learning Region.

**Proposed Amendment 1.157 and 1.165** address Recommendation No 10 of the SRA's submission to the Draft Plan which supported the completion of the Cork Metropolitan Area Joint Retail Study 2021 and its implementation, which aligns with RSES RPO 55 Retail and Cork MASP Objective 16. Accordingly, the amendments support the preparation of the Cork Metropolitan Area Joint Retail Study and Strategy with Cork County Council and support and implement the Retail Hierarchy in defining the role of retail centres, in preparing plans and in assessing development. The strategy will have regard to the Retail Planning Guidelines for Planning Authorities (2012) and it may be necessary to include any policy outcomes of this process as a variation to the plan. The clarifications are welcomed and address SRA's recommendation.

**Proposed Amendment 1.153 and 1.161** strengthens support for the circular economy, stating that new collaborative ways of delivering responsible entrepreneurship, underpinned by sustainable design and circularity is supported within these sectors and the wider economy. The plan supports the city's transition to a Circular City, collaborative ways of delivering responsible entrepreneurship, underpinned by sustainable design and circularity. The benefits include resilient job creation and new sustainable business opportunities. The SRA welcome the amendments which are supported by RSES RPO 56 Low Carbon Economy, RPO 60 Social Enterprise and RPOs 107 and 108 in support of Circular Economy initiatives.

Recommendation 4 of the SRAs submission to the Draft Plan stated the SRA's concern that for certain site designations under Objective 7.10, access to the strategic road network is evident with less analysis presented on the justification for the site designations in land use and transport planning terms. The RSES seeks the integration of employment land use with sustainable transport planning. Strategic employment locations under the RSES and MASP need to achieve high levels of accessibility by public transport and require an identification of infrastructure packages to service these lands to justify Tier 1 or Tier 2 status and align with Cork MASP Objective 7 Integrated Landuse and Transport Planning, Cork MASP Objective 8 CMATS and Cork MASP Objective 12 Infrastructure for Strategic Employment Locations.

The SRA note the following amendments under Chapter 7 address this recommendation:

- Proposed Amendment 1.149 Strategic Employment Site No 2 Clogheen Business Park Extension , Tier 1, is reduced in scale from 6ha to 3ha.
- Proposed Amendment 1.150 Strategic Employment Site No 4 Glanmire , Tier 2, is reduced in area with Site 4A now 22ha for logistics use and Site 4B now 24ha for light industry. The amendments justify the designation with a commitment to prepare a masterplan, enhance connectivity to adjacent uses, address accessibility with the planned Cork Northern Transport Project , address placemaking qualities and integrate public transport services with a new bus terminus.
- Proposed Amendment 1.151 has removed Strategic Employment Site No 5 South Link Road from Tier 2 to designation as a site for Long Term Strategic Regeneration.
- Proposed Amendment 1.152 removes Strategic Employment Site No 6 Fairhill as a strategic employment landbank updates text for .
- Proposed Amendment 1.163 updates text for Blarney Business Park Extension to provide for a high quality extension to Blarney Business Park using the existing access to the Park, subject to finalisation of the M20 route corridor design and confirmation by TII of the suitable access arrangements for the business park.

The SRA welcome the additional clarifications for Strategic Employment Sites. In the implementation phase of the Development Plan, as part of the commitment to active land management, it is expected that a commitment to master plan led development, integration of public transport accessibility, co-ordination with infrastructure stakeholders to agree access and phased services to deliver Strategic Employment sites will be pursued in accordance with RPO 62 Locations for Employment Development and RPO 151 Integration of Land Use and Transport.

**Proposed Amendment 1.160** addresses Recommendation 11(b) of the SRA's submission to the Draft Plan which advised extending Objective 7.3 Economic Clusters and Innovation Corridor, to support wider economic interactions between the city's innovation corridor and the Region's economic drivers including the Atlantic Economic Corridor (AEC). Accordingly, new text is added to the objective stating under Part (d) that economic interaction and collaboration across the wider Region will be strengthened, especially between emerging innovation corridors in Cork City and wider networks of collaboration and innovation such as the Atlantic Economic Corridor. These will serve to reaffirm the City's role as a primary driver for the region's economy.

This amendment is supported and aligns with Section 4.4 of the RSES, RPO 6 Collaboration Between Metropolitan Areas and RPO 41 AEC.



## 2.8 Environmental Infrastructure

The SRA support and welcome the following Proposed Amendments:

- **Proposed Amendment 1.186** in support of implementation of Irish Water's National Water Resources Plan and addressing the needs for Cork's water resources in alignment with RSES Section 8.1.1 Water Supply and RPOs 208-210.
- **Proposed Amendment 1.187** in support of Irish Waters Small Towns and Villages Growth Programme for water and waste-water treatment in alignment with RSES RPO 26 Towns and Villages and RPO 213 and 216 Rural Treatment Services and Servicing of Rural Villages.
- **Proposed Amendments 1.189 and 1.206** in support of implementing new Department Guidelines for Nature Based Solutions and Water Sensitive Urban Design in alignment with RSES RPO 124 Green Infrastructure, RPO 126 Biodiversity and RPOs 122 and 218 for Sustainable Urban Drainage and Rainwater Harvesting.
- **Proposed Amendments 1.193 and 1.207** in support of Coastal Change Management and strategy preparation to adapt for climate change in alignment with RSES RPO120 Flooding and Coastal Erosion.
- **Proposed Amendments 1.194 and 1.208** in support of sustainable waste management practices and implementation of the forthcoming National Waste Management Plan for the Circular Economy which aligns with RSES RPO 34 Regeneration, Brownfield and Infill Development and RPOs 107 and 108 for Waste Management and the Circular Economy.

**Proposed Amendments 1.196, 1.198 and 1.210** in support of the transition to net zero and a climate neutral economy, support renewable energy sources to service the City Council area including support for off shore wind energy integration, renewable and indigenous gas and local/community scaled renewable energy generation. The SRA note the strengthening to engage with the SEAI's methodology for Local Authority Renewable Energy Strategies (LARES) and commits to the preparation of a LARES which will set renewable energy targets and follow best practices during Development Plan implementation. These amendments align with RSES RPOs 87-90 for low carbon energy future and regional decarbonisation, RPOs 95-101 for renewable energy, RSES Section 8.2 Strategic Energy Grid and RPOs 219-224 for new energy infrastructure, integrating renewable energy sources to the distribution grid and support for local and micro renewable energy production.

## 2.9 Key Growth Areas and Neighbourhood Development Sites

The SRA note the following proposed amendments that strengthen the justification for infrastructure led growth to Key Growth Areas as presented in the Draft Plan Core Strategy:

- **Proposed Amendment 1.220** supporting framework masterplans to deliver infrastructure servicing the South Docks and North Docks.
- **Proposed Amendment 1.229** supporting school facilities for the Docklands.
- **Proposed Amendments 1.237, 1.240 and 1.243** supporting coordination with the NTA to provide public transport infrastructure and increase public transport services to meet trip demand patterns and deliver Bus Connects and LRT for dockland regeneration.
- **Proposed Amendment 1.294** coordination with Port of Cork for City Quays phased regeneration.

- **Proposed Amendment 1.295** new objective in support of land acquisitions in the Docklands to deliver needed advancement with public realm, recreation, community uses, transport infrastructure, flood defences and utility services.
- **Proposed Amendment 1.299** provides a new objective for enabling infrastructure and coordination with NTA, TII and Irish Rail to service the regeneration of Tivoli Docks.
- **Proposed Amendment 1.300** provides additional clarification of infrastructure needs to service South Ballincollig/Maglin including distributor road access and public transport corridor.
- **Proposed Amendment 1.301** provides a new objective to prepare a South Glanmire Framework Plan.
- **Proposed Amendment 1.304** supports the Castletreasure Expansion Area as a strategic city consolidation and expansion area with additional text seeking ecological surveys, phased delivery of transport access, public transport services , active travel access, water and waste water services and agreement on the proposed integration of the N28/M28 national road and ancillary local network improvements.
- **Proposed Amendment 1.305** for the Airport City Gateway supports the regeneration of the mixed industrial and commercial area centred on Tramore Road and Kinsale Road and requirement for a Framework Plan with two study areas.
- **Proposed Amendment 1.308** for Kilbarry, providing a new objective stating sites zoned Tier 2 Residential and designated as Longer-Term Strategic Development will be master planned to accommodate a housing and have regard for and integrate the amenity, heritage and social history of the area.

Also noted, **Proposed Amendment 1.298** inserts additional text in Objective 10.40 for Development of an Airport Business Park. This amendment is supported by the SRA and addresses Recommendation 4.2 of the SRA's recommendation to the Draft Plan which advised support to enhanced public transport connectivity to the airport. The amendment supports office-based industry or tourism related projects requiring an Airport location, internationally traded services, corporate offices and uses that are complimentary to those in existing Airport business park. All such proposals shall be accompanied by Traffic and Mobility management plans and Road Safety Audit (RSA), carried out by suitably competent persons, in accordance with the TII's Traffic and Transport Assessment Guidelines. The SRA note that connectivity to the airport is dealt with in Sections 10.188 to 10.192 of the Draft Plan and will be key considerations in the development of the Airport Framework Plan. The amendment is aligned with Cork MASP Objective 14 Cork Airport.

The proposed amendments are supported and address Recommendation No 2 of the SRA's submission to the draft plan requiring strengthened land use and transport planning led justification for the distribution of growth to Key Growth Areas.

Refer to Section 1.0 for comments on Zoning Amendments that require assessment where they conflict with the principles of delivering compact growth. Any determination following such assessment should also be reflected in amendments to Chapter 10 Key Growth areas as applicable.

## 2.10 Placemaking and Development Management

The SRA support and welcome the following proposed amendments:

- **Proposed Amendment 1.318 and 1.319** requiring resource management plans for construction and demolition waste in alignment with RSES RPO 34 Regeneration, Brownfield and Infill Development.
- **Proposed Amendment 1.316 and 1.320** in support of high quality placemaking, permeability and 15 Minute City Neighbourhoods, in alignment with RSES RPOs 31 Sustainable Place Framework, RPO 152 Local Planning Objectives and RPO 176 10 Minute City and Town Concepts.
- **Proposed Amendment 1.326** supporting Safe Route to Schools initiatives and healthy active travel in alignment with RSES RPO 152 Local Planning Objectives, RPO 174 Walking and Cycling and RPO 185 New School Facilities.
- **Proposed Amendment 1.331** in support of sustainable higher density targets in alignment with RSES RPO 35 Support for Compact Growth, RPO 151 Integration of Land Use and Transport and RPO 165 Higher Densities.
- **Proposed Amendment 1.335 and 1.336** in support of adaptation to climate change and strengthened flood risk management in alignment with RPOs 113-119 for Flood Risk Management Objectives.

## 2.11 Implementation

**Proposed Amendment 1.346** addresses Recommendation 12 of the SRA's submission to the Draft Plan seeking a stronger commitment for collaborative approaches for RSES and MASP implementation. The SRA supported an inclusion under Chapter 13 Monitoring for continued collaboration on joint City Council and County Council strategies, initiatives and partnership to deliver the objectives of the Cork MASP.

Accordingly, the proposed amendment commits to monitoring to inform the two-year review of the City Development Plan on progress securing Plan, to ensure consistency with pertinent objectives within RSES, Cork MASP and CMATS, monitoring of environmental impacts, support to the RSES two-year review cycle and develop a matrix-based framework to confirm progress under the nine Strategic Objectives for Growth under the Core Strategy. The SRA note that through the plan and other amendments, reference to and commitment to deliver on joint initiatives with Cork County Council within the metropolitan area is demonstrated.

**Proposed Amendment 1.347** further commits that Cork City Council will collaborate with relevant stakeholders to help deliver the objectives set out in Cork MASP.

The amendments are supported, will assist the implementation and monitoring of the RSES and Cork MASP and aligns with RSES RPO 226 Implementation Mechanisms for the Strategy and MASPs and RPO 229 Monitoring the Strategy.

## Conclusion

The SRA welcomes the publication of Proposed Material Alterations to the Draft Cork City Development Plan 2022-2028 and commend the Development Plan team for amendments which strengthen the content of the Development Plan, strengthen implementation of key objectives which will deliver the objectives of the NPF and RSES and which have addressed the previous recommendations of the SRA to the Draft Plan.

A specific recommendation under Section 1.0 is necessary from the SRA's perspective to strengthen the Core Strategy as required by Recommendation No 2 of the SRA's submission on the Draft Plan, strengthen the evidence based and infrastructure led planning approach to achieving NPF and RSES objectives and targets for Compact Growth and deliver for the Draft Plan's Strategic Objective 1 Compact Liveable Growth.

These observations are provided to assist and demonstrate that strengthened alignment between the Draft Development Plan and RSES Strategy is being achieved through these proposed amendments.

The RSES team are available for further consultation and for any clarification required regarding this submission.

**Mise le meas**

A handwritten signature in blue ink that reads "David Kelly". The signature is stylized and cursive.

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David Kelly

Director Southern Regional Assembly