

NPF Submissions
Forward Planning Section
Department of Housing, Planning, Community and Local Government
Custom House
Dublin D01 W6X0

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RE: Cork Chamber Submission to the Draft National Planning Framework

Cork Chamber, which represents more than 1,200 businesses who employ over 100,000 people in the Cork region, welcomes the opportunity to respond to the draft National Planning Framework (NPF) and share our view on how we see Cork and Ireland develop to 2040.

In this submission we identify where we see the draft plan as being on the right path, and where we consider the draft plan to be lacking in ambition.

To put this submission in context, we open with a few basic facts around Cork: Ireland's second city region:

- Cork is home to over 500,000 people, with more than 305,000 people living in the metropolitan area
- Cork has a college population of over 40,000 people (staff and students)
- Over 150 FDI companies have chosen Cork for their operations in parallel with an ever-thriving indigenous base
- Cork offers a perfect combination of vibrant and compact city-living, surrounded by 1,100 kilometres of spectacular coastline on the doorstep
- Cork Airport serves over 50 destinations across the UK, Europe and the US
- Cork is the Food Capital of Ireland and host to more than 20 festivals a year
- Cork has strong, established clusters in ICT, pharma, life-sciences, cyber security, energy, marine, agri-food, and financial services.

Looking at the objectives of the NPF, overall we welcome the intention set by the target of 50% future population growth in Ireland's main cities but feel that this figure should be further increased and strengthened. This approach will match the ambition of ensuring better balanced growth between our regions, and the aim to focus future growth in and around existing (sub)urban areas and maximise return on existing infrastructure. Learning from mistakes of the past, the realisation of these three core ambitions are central to developing a more sustainable society and economy in Ireland going forward.

In relation to Cork specifically, we welcome the intention of accelerating population growth in the city and suburban area to twice the rate of that in the past 25 years, and up to three times the projected national average over the same period.

We note how the past six years has already seen more business and people locating within inner urban cores. This trend is backed by the findings of Census 2016, which showed a Cork City population increase of 5.4% since 2011. With more jobs, especially high-value jobs, opting to be based in city centres in order to attract and retain the best staff, we expect further city centre population growth to follow in the years ahead. In the image below, we outline new developments underway in Cork city centre which can accommodate further jobs growth in the region.

In our view, a growing desire for urban living and working must be respected by, and indeed supported, by the objectives of the Ireland 2040 strategy.



Based on census 2016, Metropolitan Cork has a current population of 305,406 people.¹ Yet, the draft Ireland 2040 document defines Cork City and Suburbs as having a population of 209,000 people, with a growth target of 115,000 additional people to 324,000 persons in 2040. In other words, Metropolitan Cork is already home to close to the number of people targeted for growth under the plan.

¹ Census 2016

We believe that the figures used to define Metropolitan Cork must be shown by a clear and transparent methodology and that this same methodology must be applied to all cities of scale. We also believe that the ambition for Cork in Ireland 2040 is not strong enough.

The Cork 2050 submission made by Cork City & County Councils, focuses on delivering an escalated growth scenario for Cork of at least 846,000 people including an additional 53,000 people in the city and 168,000 additional people in Metropolitan Cork. This 2050 submission also aims for another 120,000 jobs to be created in Cork. Cork Chamber actively endorses these figures.

The draft issues and choices paper clearly explained how it is in Ireland's national interest to rebalance growth that complements Dublin, both to improve life for people living and working in the Greater Dublin Area, as well as create more opportunities outside of the Capital. **Against this objective, Cork Chamber does not consider the growth target for cities other than Dublin to be strong enough. With 50% of future growth proposed to happen in Dublin and its commuter belt, existing economic imbalance across the island will perpetuate, which has a real risk of threatening the attractiveness of Ireland Inc for future investment.** It is our view that Cork has the potential and scale to absorb higher growth figures than those put forward in the draft. With clusters of industry, critical mass, international connectivity (port, airport and digital), energy infrastructure, world leading Higher Education Institutes, skills, culture and quality of life, and a resilient economy, we firmly believe that Cork embodies a Republic of Opportunity, which is home to the strongest and most immediate possibilities as a location for significant growth in the coming years.

The job creation performance of Cork and the South-West speak to the potential of the region. In the past year, the South-West has seen more jobs created than any other region in the country, resulting in the South-West now having the lowest unemployment rate in the State, 4.8% as of Quarter 2 2017.² **Consequently, we propose that the final NPF is amended to reflect the 2050 growth target for Cork.** By ensuring additional population growth in Cork, the objective of ensuring better balanced growth between the regions and reaching a total population of 2 million in the Southern Region will be supported. We note how the job creation target for the Southern Region currently is proposed for 220,000 additional jobs, but suggest that population and employment growth targets be aligned, with specific figures also identified for each of Ireland's five main cities.

Second, and in reference to above, the position and ambition of Cork, as Ireland's second city and the driver of a thriving Southern Region, must be recognised in the content and substance of both Ireland 2040 and the National Investment Plan. In Cork, Ireland already has a thriving second city and its status needs to be clearly stated in the National Planning Framework. To group Cork with Ireland's smaller cities shows a lack of ambition to leverage Cork's true potential as a medium-sized European centre of growth and innovation and move Cork to the next level, thus enhancing Ireland's metropolitan profile and strengthen Cork and the Southern Region as a real complementary centre of growth to Dublin.

² <http://www.cso.ie/en/releasesandpublications/er/gnhs/quarterlynationalhouseholdsurveyquarter22017/>

This, we believe, is a particularly striking omission given that the National Planning Framework Choices and Issues paper speaks to the need for developing strong second tier city-regions. This paper published in February refers in part to Manchester and the Northern Powerhouse in the UK, and the hierarchy of cities in similar advanced economy (see below table), while also mentioning “a recent EU ESPON study which tested future spatial development scenarios in Europe to 2050, identified such a ‘second tier cities’ approach as offering the highest level of territorial cohesion and competitiveness at a European level as compared to alternative scenarios that focused on the largest principal cities (which most closely equates with the current reality in Ireland) and a scenario that focused on the smallest cities and large towns”.³

Table 4.1.2 The Hierarchy of Cities and Towns in Ireland in comparison to similar advanced small Countries					
Country	Ireland (incl. Northern Ireland)	Denmark	New Zealand	Scotland	Finland
Cities →500,000	Dublin	Copenhagen	Auckland	Glasgow	Helsinki
Cities →200,000	(Belfast) Cork	Aarhus	Christchurch Wellington	Aberdeen Edinburgh	Tampere
Cities →100,000		Aalborg Odense	Dunedin Hamilton Tauranga	Dundee	Jyväskylä Kuopio Lahti Oulu Turku
Cities →50,000	(Derry) Limerick Galway (Lisburn (Newtownabbey) (Bangor) Waterford	Esbjerg Horsens Kolding Randers Roskilde Vejle	Hastings Napier Nelson New Plymouth Palmerston North Rotorua	Cumbernauld Dunfermline East Kilbride Hamilton Livingston Paisley	Hameenlinna Joensuu Kotka Kouvola Lappeenranta Mikkeli Pori Rovaniemi Salo Seinajoki Vaasa
Total Number of Cities	5 (5)	10	12	10	18
Number of Towns →15,000	25 (16)	35	15	41	36
Overall Total	30 (21)	45	27	51	54

Source: citypopulation.de

As clearly illustrated above, Cork as Ireland’s second city is comparable in size to other EU cities in similarly advanced economies. It is important to note that Cork is already recognised as the second city by certain State agencies and within some Government policies. As such, there is a risk of a policy gap if a second city recognition is not carried through into the final NPF. **To ensure a consistent approach to policy and planning across Government we urge the final document (and**

³ Ireland 2040 – Issues and Choices, pp. 24-25.

the associated National Investment Plan) to be amended to recognise Cork as Ireland's second city and the driver of a thriving Southern Region.

As part of strengthening Ireland' metropolitan profile, we suggest that the NPF include steps to strengthen the power of local authorities, particularly within our cities, similar to what has happened in the UK with the devolution of greater powers to the City of Manchester to drive a thriving Northern Powerhouse region.

Recognition the national importance of Cork performing to its best potential, **we also assert that the Tivoli and City Docks sites must be designated as strategic national assets in the final plan.**

Spanning over 220 hectares on prime waterfront locations in immediate vicinity to the city centre, Cork's Docklands possess a unique development potential not only in an Irish but an international context. Development of these sites are every bit as important to Ireland as the development of other new hard infrastructure. Cork Chamber recommends that the NPF include steps of implementation, of which Cork's City Docks should be listed among the priorities. If Ireland is serious about consolidation of cities, the Docklands must be part of the final plan such is the scale of their potential. In this context, we note that the Dublin Docks is specifically referred to as a case study in the draft plan, which could be replicated in Cork provided that these sites receive Government backing. The stated intentions of the NPF can be proven in Cork.

The need for Government backing leads us to the third point. Cork Chamber welcomes the ambition of enhancing the urban environment, including a commitment to improve public transport, safe and pleasant cycling areas, better housing choice and quality and more attractive public spaces. Nevertheless, to ensure that our cities are consolidated and become more resilient to climate change, **investment must come first to change habits.** Part of such investment is in hard infrastructure ensuring viability of development of key strategic sites. Here, we again refer to the Cork's Docklands and the need for investment in flood protection for this waterfront site, as well as the East Gate Bridge and a pedestrian bridge linking the South Docks north of the River Lee.

Although Cork has some of the elements needed to ensure resilient communities (transport, energy and economic diversity), it has been greatly under resourced as regards public transport provision. **We propose that the final version of the NPF is amended to include significantly improved public transport and pedestrian/cycling infrastructure as future key enablers for Cork.** Part of this should also involve improved inter-urban public transport, including a 1 hour train journey between Cork and Dublin and faster rail connectivity between Cork and Limerick. Equally, we note the ESRI finding that the proportion of people over the age of 65 will increase by 23%. In our view, our demographic development underlines the importance of building sustainable cities and communities that are compact, age friendly and easily navigable by public transport.

For Ireland to transition to a more sustainable society, it is also important to ensure changes to building regulations, notably height restrictions. **In Cork, we should grow up and not out. Our vision is that of an internationally competitive and compact high-rise city,** characterised by increased efficiency in land use with between 3500 and 4500 people per square kilometre at centres and along

transport corridors. In our view this approach is the most effective way to generate a strong and vibrant business and community environment serviced by effective infrastructure. If we do not deliver on building compact, smart urban areas, the NPF will merely become aspiration and will fail to change Ireland for the better. To avoid this, more must be done to encourage housing in our urban cores, including more provision of affordable, quality rental apartments in city centres.

In reference to the key future enablers for Irish cities, we suggest that these are expanded to look at key projects for city regions rather than just cities, which better reflects the reality of the need for metropolitan area strategic planning. Looking at the enablers for Cork on page 55, one striking omission is the Northern Ring Road. **It is the view of Cork Chamber that the Northern Ring Road must be included in the final paper as a key enabler** given that this road has a demonstrable need in terms of taking heavy through traffic out of the city road network and providing an important link between Dunkettle Interchange, the Southern Ring Road, the N28 to the Port in Ringaskiddy, and the M20 motorway between Cork and Limerick. Furthermore, the Northern Ring Road will arrange for providing access and improved public transport to areas of development with a view to creating new social opportunities for historically deprived areas. Important road projects already confirmed, such as the N22 Cork-Kerry road, the M20 Cork-Limerick motorway, and the M28 Ringaskiddy Motorway should also be listed among the key enablers required for Cork and the region to grow on page 55.

Another key enabler for Cork and the Southern Region which we believe should be included in the final plan is that of continued growth of connectivity at Cork Airport, enabling a two-way trade and tourism exchange into and of the region. **We ask that the final plan is amended to include enabling infrastructure development at Cork Airport over the plan's timeframe.**

Our fourth observation relates to digital connectivity. As an island nation we have a critical need to be connected internationally. The increased resilience of Ireland's domestic digital infrastructure can be strengthened via better utilisation of Cork to ensure best practice in resilience and security of services. **Currently IP routing is unnecessarily, and overly concentrated in Dublin. Government procurement of data replication, disaster recovery and IP transit should be diversified to ensure a secondary routing site outside of the Dublin area.** On the international stage, currently all Irish Internet traffic to mainland Europe must pass through the UK. From 2018, the planned construction of the IFSC fibre optic cable from Cork to France will avoid the UK. Should the Celtic Interconnector proceed, it will create a diverse route from Ireland directly to mainland Europe. These two cables from Cork can also, ultimately, reach the Middle East and Asia via Marseilles. It is vital that IFSC and Celtic Interconnector break out with local routing in Cork and do not simply pass through. Tier 1 connectivity, delivered to Cork via the GTT Hibernia Express fibre, is a national asset. With the development of layer 3 routing intelligence in Cork, there would be a further opportunity to break out that connectivity locally and ensure a more resilient, and faster Internet service for Cork and regions beyond.

At a regional level, resilient and diverse dark fibre must be available at cost effective pricing in order for Cork and regional towns to maintain the ability to attract businesses and investment. Currently there is a concern that The National Broadband Strategy will further concentrate routing in Dublin

with businesses viewing Dublin as the only viable location in Ireland for investments due to the concentration of cable termination and routing in the region. Ultimately, Cork should be enabled to become a significant player in the data sector, thereby furthering the national capacity in this market. Based on the already significant infrastructure and the superior availability of power, Cork is an ideal location to grow data centres and an international switching centre. Finally the connectivity of our regions is crucial to growing and developing our thriving indigenous sectors such as tourism and agri-food. The potential of our national digital infrastructure must be supported by Government policy and support.

Further to our connectivity, talent, knowledge and innovation will mark out the high-performing countries of the future. We need to embrace technology but need also to retain our dynamic human skills and ability to adapt, through encouraging entrepreneurship, lifelong learning, and cultural production. This will enable us to maintain competitiveness, generate growth and attract new investment which is particularly important given the demographic challenges facing Ireland in the years ahead. Cork's existing college population (staff and students) exceeds 40,000 people – the size of a large town. For example, earlier this year, UCC unveiled its most ambitious strategic plan in history, under which the college will commit to a €350m investment programme to support a growing society and economy and attract more students from within Ireland and abroad. **Cork Chamber proposes that the need for additional investment in our third level institutes, including UCC, Tyndall and CIT, to meet the education needs of the future is encompassed in the Ireland 2040 strategy.**

Fifth, in relation to economic development, we suggest an addition to section 7.3 which sets out Economic Corridors and the importance of working together for economic advantage. Here, **we propose that the Atlantic Economic Corridor is included.** With the M20 confirmed as being part of the new 10 year Investment Plan, Ireland faces a unique opportunity to build an economic corridor of scale linking major education, population and employment centres on the western seaboard. This will help ensuring better balanced growth between our regions, which is one of the core objectives of the NPF and therefore ought to be included. The M20 will also improve levels of service (travel times per km) between Ireland's second, third and fourth cities, replicating the level of service between each of them and the Capital.

Sixth, although we agree that urban areas will be the primary economic drivers of Ireland in the future (which is fully in line with international trends), **Cork Chamber supports the vision to also focus on rural regeneration and rural growth.** As rightly highlighted in the draft plan, our tourism and agri-food sectors are key indigenous industries often located in rural areas with huge potential to create additional local employment in the future. Our agri-businesses, in particular, have grown substantially in recent years and are now heavily invested in global exporting. Already, agri-food accounts for over 10% of all merchandise exports while the Food Wise 2025 strategy aims to position Ireland as a world leader in sustainable agri-food production, growing total exports to €19bn per annum. Further, Ireland's rural countryside is the focal point for marketing Ireland overseas and one of the main reasons that we attract millions of visitors every year. Our rural areas

need support and protection. We support plans for development of greenways and blueways to improve access to our rural hinterland while also supporting better national health outcomes.

The direct economic value of Ireland's ocean economy was €1.8 billion, around 0.9% of GDP, in 2016 reflecting an increase of 20% on 2014 levels^[1] with sea-based transport in particular accounting for 85% of the total volume and 56% of the total value of goods traded in Ireland in 2016. Sea-based transport continues to be the largest contributor to Ireland's ocean economy in terms of turnover and Gross Value Added. Cork is home to the Port of Cork, the second biggest natural harbour in the world, with plans underway to expand the capacity of the Port. The Port's overall redevelopment plan will influence the future resilience of our strategic national assets portfolio, with the port designated as one of only three Tier 1 Ports of National Significance in Ireland. As an island nation, we are heavily dependent on sea-based transport to link Ireland to world markets. In Cork, we are strategically poised to harness that potential. Furthermore, Cork has become a centre for research and development through institutions such as the National Maritime College of Ireland and the MaREI centre for marine and renewable energy research, development and innovation. **We emphasise that the Cork region has vast potential in relation to diversifying the domestic energy supply as well as sustainably harnessing renewable blue economy growth potential.**

Conclusively and crucially, implementation of the plan is key to its success. We welcome the decision to put the NPF on a statutory footing to ensure that the plan (unlike its predecessor) becomes a success. The NPF should be consistently monitored and implemented, and we support the intention of establishing a Planning Regulator to assist with regulating forward planning. However, given that there will be a separate new 10 year National Investment Plan to sit in parallel with the NPF, **this regulator should at a minimum ensure close cooperation between relevant Departments, agencies and Stakeholders to ensure the NPF and the National Investment Plan (NIP) retain their integrity and are mutually reinforcing and visionary.**

Yours Sincerely



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^[1] http://www.nuigalway.ie/semru/documents/semru__irelands_ocean_economy_2017_online.pdf