



Comhairle Contae Chorcaí
Cork County Council



Comhairle Cathrach Chorcaí
Cork City Council

Eoghan Murphy TD,
Minister for Housing Planning and Local Government,
Custom House,
Dublin
D01 W6X0

8th November 2017

Re: Submission on *Ireland 2040 Our Plan - National Planning Framework*

Dear Minister Murphy,

Cork City Council and Cork County Council wish to make the following joint submission on *Ireland 2040, Our Plan, National Planning Framework*:

Introduction

We welcome the draft National Planning Framework, which sets out a strategy for the development of Ireland to 2040. The legislative backing, coupled with the fact that it will be underpinned by a new 10 year National Investment Plan will greatly strengthen the NPF's potential for success. The proposals to strengthen regional growth and connectivity should result in greater regional parity, to the long-term benefit of the Country as whole.

Role of Cork

The recognition of Cork's role and potential as an international centre of scale to complement Dublin and the acknowledgement of its role as a medium sized European Centre of growth and innovation, critical to further enhancing Ireland's metropolitan profile is welcomed. In this, the NPF takes on board the key message in Cork 2050 (the Joint Cork County Council and Cork City Council submission), that Cork has the available capacity at a crucial time nationally to relieve pressure on Dublin and drive growth in the southern region. More explicit recognition in the NPF that Cork is Ireland's only second tier city/city region, would be appropriate in this context.

While the recognition of Cork's role at national and international level is welcomed there are serious concerns that the role of the wider Cork Metropolitan Area is not adequately recognised in the draft NPF, as growth targets appear likely to be lower than envisaged in Cork 2050.

As Cork 2050 highlighted, Cork has existing and planned infrastructure to deliver significant population and economic growth, within a sustainable compact city and wider Metropolitan area. In that context, Cork 2050 demonstrates that the Metropolitan area could deliver a population of over

500,000 by 2050, served by high quality public transport corridors, in a way that will help consolidate spatial distribution of people and employment. The strategy for Cork set out in Cork 2050 was developed in conjunction with and has the support of the key public and private sector stakeholders in Cork.

Cork City and Suburbs

The level of growth assigned to Cork City and suburbs in Ireland 2040 is welcomed, as is the acknowledgment that a range of enablers will be required for that level of growth to be satisfactorily achieved. Attaining the required step change in population and economic growth will require strong and explicit support for these enablers in the NPF and the National Investment Plan. In particular achieving the targeted increase in brownfield and infill development will require significant investment in social, cultural and recreational infrastructure (as well as transport, water, waste water services) to ensure that we have a liveable, attractive city into the future.

Metropolitan Cork

Metropolitan Cork is a central feature of the Cork 2050 submission, acknowledging the role that the wider Metropolitan area plays in supporting the city and driving the region. This has been recognised in previous strategic planning strategies such as the Cork Area Strategic Plan. The success of the wider Metropolitan Area can also be measured by the manner in which key Strategic Employment areas, such as the Cork Harbour economic zone, have delivered sustainable economic growth, contributing to the Metropolitan area's influence in the Cork region. However, the role of the wider Metropolitan area has not been fully recognised in the NPF.

The Draft NPF introduces the concept of the Metropolitan Area Strategic Plan (MASP) to cater for strategic planning matters in Metropolitan Areas. The MASP should be prepared within the context of National and Regional Strategic Planning Frameworks.

It is our view the MASP should be prepared and implemented by the Cork Local Authorities, building on lessons learned and achievements enjoyed over decades of integrated strategic planning approaches in Cork, and more recently implementing the Cork Area Strategic Plan. Accordingly the Cork Local Authorities and key stakeholders are well positioned to deliver the appropriate MASP, while collaborating with the Southern Regional Assembly and DHPLG.

Population Targets

The Cork 2050 Joint Submission indicates that with appropriate investment, Cork has the capacity by 2040 to cater for a total population of c750,000 and approximately 70,000-80,000 additional jobs.

The absence of an Economic Strand to the Draft NPF has resulted in a failure to acknowledge the important contribution the wider Metropolitan Cork area has played to the economy in Cork, the Southern Region and State. In our view the scale and unique capacity of the Cork Metropolitan Area to deliver sustainable population and economic growth should be appropriately reflected in the form of clear population (and jobs) targets.

It is difficult to be certain as to the intended population growth target envisaged for Cork City and County in the Draft NPF, however it would appear that on a best case scenario based on

assumptions derived from the Draft, Cork would have policy support to deliver a total population growth of approx 171,000 by 2040.

In our view this represents a significant shortfall, relative to Cork's true capacity to deliver sustainable growth as set out in Cork 2050 - with the majority of the shortfall in the wider Metropolitan Area.

It is suggested revised population growth targets, in-line with those set out in Cork 2050 should be stated, with specific targets for the wider Metropolitan Area that seek to facilitate sustainable growth in the towns along the public transport corridors, such as those served by the commuter rail line.

Policy Support Facilitating up to 40% Growth in Specific Rural Towns

The Draft NPF makes provision for up to 40% target population growth at locations in the North & West Regional Assembly Area owing to the fact that they have an important strategic function in their hinterlands, notwithstanding being relatively small in population terms. It is considered where the evidence base supports such an approach specific provision should be made for similar policy provision in towns in West, North and East Cork that have a similar strategically important function.

Smart Growth Initiative

The Smart Growth Initiative is welcomed in principle as it seeks to promote sustainable growth and investment patterns in Cities, Towns, Small towns and Villages. It will be particularly important in delivering the step change required to deliver compact sustainable growth in the City and suburbs. However questions remain as to how the process will be administered and whether Local Government is currently resourced and structured to engage in the tendering process effectively. Particular concerns arise in this context in areas outside of Cities and suburbs and specifically rural areas.

Economic Development

The references to economic development in the Draft NPF are quite limited and could be strengthened. More reference to Cork's economic strengths and potential is needed, as these will be essential to achieving the role envisaged.

For example, having regard to the security of supply available arising from Corks capacity to generate the necessary energy, the extent of fibre connectivity, and the strength of the ICT Sector the NPF should acknowledge Corks assets as a potential future location for data centres and further concentration of the ICT Sector.

Marine Assets

Cork accounts for approximately 20% of the States coastline and opportunities associated with this natural asset have the potential to drive growth that will be sustainable over the longer-term.

It should be noted that in addition to the Cork Harbour Economic Zone, the Cork coastline hosts the Naval Base at Haulbowline, significant tourism/leisure assets, natural resources as well as commercial fishing, strategically important Oil Refinery capabilities and the capacity to contribute to the States renewable energy production capacity.

In this context Cork is uniquely positioned to play a key role from a Marine Spatial Planning perspective, particularly given the effective collaborative relationships enjoyed with the 3rd Level Education Sector and State Agencies, in addition to close working relationships with the commercial sector.

Broadband

The Cork 2050 Submission placed a particular emphasis on broadband and particularly in the context of rural communities. The Draft NPF acknowledges the importance of broadband. However it is considered the finalised NPF would benefit from committing to the effective roll-out of same in a specified timescale to support sustainable communities.

Tiered Zoning proposals

The proposed tiered approach to zoning is welcomed but greater clarity is needed, particularly in its implications if any for brownfield regeneration areas, such as Cork Docklands.

Interim Review

The approach to population growth target distribution is set within a National, Regional and City and Suburbs context initially, with provision being made for Regional Assemblies to prepare RSES to manage the distribution of a further 50% of population growth.

It is considered the Final NPF should provide detailed guidance on the RSES process. It is particularly concerning that the RSES and NPF will be disconnected from an Economic Strategy Perspective and Rural Development perspective, as both of which will be central components of the RSES but are not appropriately addressed in the Draft NPF.

To safeguard the capacity of the State to deliver the required population and economic growth sustainably, express provision should be made for a dynamic Interim Review Process as to the nature and extent of growth being delivered at locations relative to the targets and strategy for same set out in the NPF, relevant RSES and MASP. Where necessary, growth should be redistributed to locations that can demonstrate capacity to deliver sustainably.

Key enablers

It is our view that if Cork is to make the step change required to fulfil its role at national level complementing Dublin, the enablers listed on Page 55 of the NPF need to be more specific and programmed (Appendix 1 proposes specific textual amendments):

- Specific reference is required to provision of infrastructure to support development of Cork Docklands, as the primary brownfield regeneration areas in Cork and nationally. This should include transport infrastructure (in particular the Eastern Gateway Bridge), public transport infrastructure, and public realm infrastructure.
- The reference to the east-west public transport system in the NPF needs to be strengthened as this is fundamental to the proposed land-use and transportation strategy for Cork. Explicit reference should be made on page 55 to provision of an east –west Bus Rapid Transit system (transitioning in time to Light Rail), supported by a strong core bus system serving the city and the wider Metropolitan area. Cycling and walking strategies should also be referenced, and consideration given to including mode share targets for sustainable transport.
- The need for a step change in public transport in Cork also needs to be referenced under the Sustainable Mobility section on page 135. There is no reference here to public transport within cities (other than Dublin).
- Specific mention should be made to upgrading the Cork commuter rail service serving the areas to the East and North of the city and providing additional stations in areas targeted for growth, such as Monard and Tivoli.
- There needs to be specific reference to the M20 Cork to Limerick Road and the associated Cork North Ring Road. The latter is essential to ensuring adequate connectivity across the Cork Metropolitan area as well as improved access to routes serving Kerry and West Cork (N22 and N71), Airport, Port and Ringaskiddy Industrial area (N40, N71 and N28), Waterford (N25) and Dublin (M8). It is also critical to advancing development proposals across the northern part of the Metropolitan area.
- Specific reference is needed to provision of the M28 to Ringaskiddy Port, (both in the Section in Cork on Page 55 and on page 133/4) and the necessary infrastructure to upgrade of the Cobh Road (Fota Road R624) to National Road standard, which will support relocation of Port and associated activities to Marino Point, and facilitate regeneration of Cork Docklands.
- Reference should be made of the need to upgrade the N25 Cork Waterford Road and to the upgrade of the N22 Cork to Tralee Road.

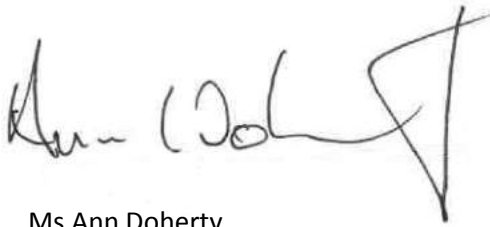
Conclusion

Cork City and County Councils welcome the focus on enhanced regional development contained in the draft National Planning Framework. In particular the recognition that Cork has a key role to play at a national and international context, complementing Dublin in the future development of Ireland, is welcomed, as is the level of growth targeted at the city and suburbs. We would like to see explicit recognition of Cork as Ireland's second tier city/city region and we feel that the enablers of growth specified in the NPF need to be significantly expanded and strengthened if they are to facilitate the step changed required to deliver the growth and expansion envisaged.

We have serious concerns, however, about the lack of recognition of the key role of the wider Metropolitan area as a driver for the region and we are of the opinion that population and employment growth targets for the Metropolitan area need to be increased to reflect this role, as outlined above.

We request that you take our concerns and comments into account in the finalisation of the NPF to enable Cork to perform to its capacity in the best interests of the Country and the Region.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ann Doherty', with a large, stylized flourish at the end.

Ms Ann Doherty,
Chief Executive,
Cork City Council

A handwritten signature in black ink, appearing to read 'Tim Lucey', with a large, stylized flourish at the end.

Mr Tim Lucey
Chief Executive,
Cork County Council

Appendix 1

Suggested specific amendments to Pg 55 of NPF

- Delivering ambitious large-scale **mixed use** regeneration projects ~~for the provision of new employment, housing and supporting infrastructure in Cork Docklands (City Docks and Tivoli) as integrated, sustainable developments~~ **including the provision of supporting infrastructure (rapid transit, transport infrastructure in particular Eastern Gateway Bridge, and public realm)** and the relocation of ~~two~~ **one** 'Seveso' site from the City Docks **and two from Tivoli Docks.**
- The development of a much enhanced City **and Metropolitan area** wide public transport system, **focused on the concept of** ~~to incorporate subject to further analysis,~~ an east-west **rapid transit** corridor (**BRT, transitioning to LRT over time**) from Mahon, through the City Centre to Ballincollig, and a north-south corridor with a link to the Airport, supported by a strong core bus network **servicing the city and wider Metropolitan area.**
- Upgrading the Cork commuter rail service serving the areas to the East and North of the city and providing additional stations in areas targeted for growth, such as Monard and Tivoli.
- Progressing the sustainable development of new areas for housing, especially those on public transport corridors such as Monard.
- Identifying infill and regeneration opportunities to intensify housing development in inner city and inner suburban areas, supported by public realm and urban amenity projects.
- Enabling enhanced opportunities for existing communities as development and diversification occurs, particularly through employment, learning and education support.
- Development of a new science and innovation park to the west of the City, accessible by public transport.
- The continued expansion of and integration with the City's third level institutions.
- M8/N25/N40 Dunkettle Junction upgrade (approved) and improved Ringaskiddy Port access (**M28**) **and upgrade of the Cobh Road (Fota Road) R624 to National Road status, to facilitate Port relocation and regeneration of docklands.**
- Enhanced regional connectivity through improved average journey times by road **including the M20 and associated Cork North Ring Road (to ensure adequate connectivity across the Cork Metropolitan area and to routes serving Kerry, West Cork, Waterford and Dublin), and upgrade of the N22 Cork to Tralee (approved) and the N25 Cork to Waterford.**
- Improved traffic flow around the City through a package of measures (**e.g. upgrade of the N40, provision of the North Ring Road and enhanced public transport and cycle network.**)
- Improved rail journey times to Dublin and consideration of improved onward direct network connections.

- Ensuring that water supply and wastewater needs are met by new national projects to enhance Corks water supply and increase waste water treatment capacity.
- Improving sustainability in terms of energy, waste and water, to include district heating and water conservation.