

#### 21 August 2020

Development Plan Submissions, Strategic and Economic Development, City Hall, Anglesea Street, Cork.

# Re: Issues Paper for the Cork City Development Plan 2022 - 2028

A chara,

Thank you for your authority's work in preparing the Issues Paper for the review of the Cork City Development Plan (the plan). The Office acknowledges and welcomes the publication of this paper and your authority's work, more broadly, in advancing the review of the plan.

In accordance with the provisions of section 31AM of the Planning and Development Act 2000, as amended (the Act), the Office is obliged to evaluate and assess development plans in the context of certain statutory parameters including:

- Matters generally to be contained in a development plan (section 10) and, in particular, section 10(2)(n) in relation to climate change;
- Consistency with the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy for the Southern Regional Assembly (the RSES);
- Ministerial guidelines under section 28;
- Ministerial policy directives issued under section 29, and,
- Such other legislative and policy matters as the Minister may communicate to the Office in writing.

The Office has set out some broad areas for your authority to consider in formulating the draft development plan.

These observations are offered without prejudice to any observations and recommendations as may be forthcoming from the Office at future stages of the plan making process, and do not affect the obligation on your planning authority to comply with the relevant legislative requirements.

## **Overall approach to Issues Papers**

The Office appreciates the challenge in presenting a succinct document with which to engage the public bearing in mind the extent of topics to be covered when it comes to planning at city scale and taking on board the many national and regional policy developments of late that are having a bearing on Cork.

The range of topics addressed are comprehensive and appropriate and the digital document is well set out, engaging and accessible. That said, given the extent of the issues papers (144 pages), there would also be benefit in their accompaniment by a short digest of the main issues the public's views are sought on.

The Office also wishes to commend your planning authority for the additional public engagement measures employed including webinars, a public survey, youth engagement, use of social media, and arrangements for one to one engagement.

# Core Strategy, Settlement Hierarchy and Implementation

As noted in the Issues Papers, the NPF and the RSES for the Southern Regional Assembly (SRA) area envisage very significant levels of growth for Cork in terms of population (75,000 additional residents), housing (c.31,200 units) and employment (c.47,000 jobs) to 2031.

The formulation of the core strategy consistent with the above population growth parameters, in accordance with section 10 of the Act, will be the most significant element in developing your authority's development plan. A key function of any core strategy is to focus on a preferred approach to both the spatial pattern and quantity of housing delivery over the lifetime of the plan.

The National Policy Objectives (NPOs) under the NPF, the Regional Policy Objectives (RPOs) and Cork MASP Policy Objectives (CMPOs) under the RSES and Cork MASP, will to a large extent, determine the approach of your authority to the content and detail of the plan.

In this regard, achieving appropriate forms of density and consolidation of the strategic housing and regeneration areas identified under tables 7.1 (City Centre Consolidation and Regeneration), 7.2 (Potential Light Rail Corridor) and 7.3 (Monard Strategic Development Zone and Strategic Residential Growth on the Metropolitan Rail Line) will play an essential role in achieving compact growth.

### Implementation

The delivery of the Cork Docklands projects (the City Docks within the city centre, and Tivoli to the east) are identified, in themselves and in terms of the supporting infrastructure, in the NPF and the RSES (s.4.0) as key enablers for the Cork MASP. Other key enablers identified include:

- Light Rail Transit (LRT),
- Suburban rail,
- Roads infrastructure (M8, N25/N40 Dunkettle Junction Upgrade; M28 Ringaskiddy Port access, etc.),
- Orbital and radial road improvements,
- The Metropolitan Area Cycle Network,
- Water supply and wastewater treatment capacity improvements (see also s.8.1 Sustainable Management of Water Supply and Waste Water Needs),
- Relocation of SEVESO sites,
- The provision of green infrastructure and walking infrastructure, and
- The management of flood risk through the sustainable development of the Lower Lee Flood Relief Scheme (CMPO19).

The delivery of other infrastructure initiatives supported by the NDP, including a new acute hospital for Cork and Cork University Hospital Phase 2, and the Cork Lower Harbour Main Drainage Project will be important on a regional and /or city wide scale.

Specific infrastructural priorities are also identified for the individual strategic sites under tables 7.1, 7.2 and 7.3, such as the provision of mechanisms to promote redevelopment of strategic city blocks and the upgrading and reuse of existing buildings; and the upgrading of parks, green spaces, waterfront and the public realm to support city centre development. CMPO5 and CMPO6 are of particular relevance in this regard.

The RSES recognises the importance of investment in enabling infrastructure for regeneration and growth areas to deliver on the population and jobs growth parameters. It seeks (RPO9 and CMPO1) co-ordinated investment and delivery of holistic infrastructure packages across State Departments and infrastructure delivery agencies and further investments to deliver on the Metropolitan Area Goals.

In this regard, the land capacity study carried out by your authority is an important step in the above process and the proposal to carry out an assessment of infrastructural and other constraints and the acknowledgement of the requirement for a tiered approach to zoning (NPO72a-72c) is welcomed.

The Office would advise that the scope of any infrastructure assessment study will need to be sufficiently broad to take account of the full range of enabling infrastructures referred to in the RSES and will need to provide clarity in terms of the timeframe for delivery, cost of delivery, identification and availability of funding and the body responsible for implementation in order to provide the certainty required to ensure delivery of the core strategy over the plan period.

This information will therefore enable your planning authority to prioritise relevant land banks with appropriate land activation measures within its control in the near, medium and longer term in order to achieve the growth objectives for the city over the 6-year plan period, and to 2031 and 2040.

Your planning authority should take realistic account of the level of certainty that the required infrastructure and facilitating works will be completed in time to facilitate the development of strategic areas to accommodate the population growth envisaged under the RSES within the plan period. Accordingly, use of scenario planning may be appropriate in devising your development plan, whereby your development plan would identify a sequence of development opportunities with in-built resilience to move to another tier of development opportunities if any key opportunity areas were subject to unforeseen delays in the delivery of enabling infrastructure.

At the same time, such alternative sites will need to be consistent with objectives of the NPF and RSES period (note, Goal 7 of Appendix 3 of the RSES is relevant in this regard).

Your development plan should also make clear what infrastructure and key enablers will be put in place, and by what mechanisms, over the period of the plan to facilitate development of other strategic areas over the medium and longer term consistent with the RSES and Cork MASP.

As addressed below, the RSES (CMPO7) also requires core strategies to support plans for sustainable transport infrastructure under the Cork Metropolitan Area Transport Strategy (CMATS) through development of appropriate density, scale and location. Development of appropriate scale and density will help ensure the cost effectiveness and viability of enabling infrastructure.

In terms of providing a rational settlement hierarchy, the Office notes the logical approach taken by your planning authority, in chapter 9, to the considering the expanded city area as four main character zones (and city centre subdivision), which would ostensibly provide a good structure upon which to base the future plan framework for the functional area of your planning authority.

### Regeneration and Compact Growth

In view of the recent expansion of the city area, entailing a fivefold increase in land area, including extensive greenfield lands, there may be pressure to develop land banks in the hinterland.

However, the ambitious growth targets for Cork City are predicated on compact growth (objectives NPO2a and NPO3b) which is a National Strategic Outcome of the NPF, as supported by the RSES (RPO10). The development plan will be required to ensure that at least 50% of all new homes targeted for Cork City will be delivered within the existing footprint of the city and its suburbs.

The policy objectives under the RSES (section 3.11 Regeneration) will inform your authority's approach under the plan. In particular, RPO34 requires that all development plans set out specific objectives to achieve urban infill/brownfield development and consider a range of issues to support remediation of brownfield sites.

The application of the Specific Planning Policy Requirements (SPPRs) specified in Ministerial guidelines issued under section 28 of the Act is required by your authority, including those for

residential development under the Urban Development and Building Heights (2018), and the Sustainable Urban Housing: Design Standards for New Apartments (2018).

The general policy requirements of section guidelines of the *Sustainable Residential Development in Urban Areas (Cities, Towns and Villages)* (2012) also apply. Compliance with the Ministerial policy requirements should ensure that all residential development, whether brownfield or greenfield, will be consistent with the objective for compact growth of the city.

Consistent with the RSES (CMPO2), your development plan should seek to address high housing vacancy rates and seek their conversion to active housing use, including through proactive measures to be pursued by your authority.

The implementation of quality placemaking, promoted by the RSES (section 3.9 Placemaking), to ensure that regenerated areas, in particular, are attractive places to live will play an important role to encouraging people to live and work in the city (RPO31 refers).

In this regard, the Office notes the objective under the Cork MASP (CMPO17) to prepare and implement a Metropolitan Open Space, Recreation and Greenbelt Strategy, which should inform your authority's proposals to prepare its Green and Blue Infrastructure Strategy and the Open Space, Sports and Recreation Needs Strategy. The Office would suggest that there is potential for these strategies to address the requirements under section 10(2)(n) with regard to climate change adaption and mitigation.

In terms of housing demand, it is important that any calculations for housing demand and, ultimately, for land zoned to accommodate such development, are fully justified, rational, consistent with the policy objectives of the NPF and the RSES, and cognisant of the relevant Ministerial guidelines.

In accordance with NPO20 and NPO37 (and RPO33), a Housing Need Demand Assessment will be required to determine the future housing requirements during the period of the plan, as is noted in your authority's Issues Papers. The Office welcomes and would strongly endorse the proposal to prepare a Joint Housing Strategy with Cork County Council, which should be put in place to inform the core strategy of both the city and county development plans.

### Economic Development & Employment

A vital aspect of the plan will be the promotion and nurturing of the city's economic and employment base. In accordance with the NPF requirements (NPO10b), the RSES has identified strategic employment development areas within the region, including within the three MASPs and other centres (section 8.3 refers). In Chapter 4 *A Strong Economy*, the RSES sets out an economic strategy region underpinned by five economic principles – Smart Specialisation; Clustering; Placemaking for enterprise development; Knowledge Diffusion, and: Capacity building – which

should inform your authority's approach. It also sets out guiding principles to assist local authorities in identifying locations for strategic economic development in the development plan.

The inclusion of objectives, policies and mechanisms to assist and secure the development of the strategic economic development locations (subject to any appropriate and necessary safeguards), consistent with the economic principles under the RSES, can therefore be anticipated to form a key element of the development plan.

The support in the development plan of investment in enterprise incubator units in higher educational institutions such as UCC and CIT (future Munster Technological University), and in the delivery of strategic plans and initiatives of the IDA and other bodies (CMPO10 refers), and in digital infrastructure (CMPO11) can be anticipated to assist in further enterprise and employment development in the city.

The importance and potential of Cork Harbour as an economic driver is recognised in the RSES, through CMPO3. In this regard, your authority's attention is also drawn to the objectives of the RSES under section 4.9 Marine and Coastal Assets, including the proposal to prepare a Strategic Integrated Framework (SIF) for Cork Harbour under RPO79b.

Although the majority of the natural harbour falls outside the city boundary, critical areas fall within the city area, including those identified for regeneration and as strategic employment areas, therefore commitment to the completion and implementation of the SIF through the development plan will be important (CMPO13 also refers).

Strengthened connectivity between metropolitan areas, key towns, tier 1 and tier 2 ports and Cork airport, integrated land use transport integration and implementation of CMATS will be important enablers for economic development under your authority's development plan.

Your authority's Issues Papers highlight the recent challenges facing city centre retail, which are common to many city centres and which have been exacerbated by government measures aimed at tackling the Covid-19 pandemic.

The RSES recognises the need for a Joint Retail Strategy for the city and county and the importance of ensuring consistency with the retail hierarchy. The Office urges your planning authority to pursue the adoption of a fully comprehensive Joint Retail Strategy, in accordance with the *Guidelines for Planning Authorities Retail Planning* (2012) as a matter of urgency in order to ensure that an appropriate range of retail development may be facilitated across both planning authorities on an ongoing basis.

As in the case of the Joint Housing Strategy referred to above, a Joint Retail Strategy should be progressed by both the city and county councils as a matter of urgency to inform the preparation of the core strategy and relevant planning policy aspects of both development plans.

## Transport & Accessibility

The Issues Paper appropriately recognises the significant increase in transport demand likely to accompany the targeted population and employment growth for the city, and the challenges in ensuring that increased demand is met through sustainable travel modes. The commitment of your authority that the Cork Metropolitan Area Transport Strategy (CMATS) will inform the Transport Strategy in the future plan will help avoid unsustainable traffic generation into the future.

It is the requirement of the RSES under RPO151 that the general principles of integrated land use transport planning will guide development, in tandem with the inclusion of relevant local planning objectives (RPO152).

It is the specific objective under the MASP (CMPO7 Integrated Landuse and Transport Planning) to seek the investment and delivery of sustainable transport measures identified under the CMATS, and to require that the core strategies of the city and county development plans allocate distribution of future population and employment growth with the integration of land use and transport planning principles, public transport nodal points and targets identified through the CMATS.

It is also an objective to achieve regeneration, consolidation and strategic growth along the potential LRT route, the suburban rail corridor and along strategic bus network corridors. A further objective is to identify and deliver strategic locations for increased residential and employment use at public transport interchange locations relating to the proposed LRT route, suburban rail and strategy bus network, and higher densities at public transport nodal points where practical. The key transport objectives to be taken into account in your development plan are set out under CMPO8, subject to consistency with the recently published CMATS.

The Office advises that the development plan provides clear policy support for the specific measures for each transport mode proposed under CMATS, and to include relevant objectives (e.g. route reservations) in order to facilitate its implementation and, ultimately, to engender the required modal shift to sustainable and active transport modes.

Based on the information in the Issues Paper and the RSES, your planning authority has a reasonably favourable modal share for active modes. A key challenge will be to maintain and increase the share of active modes whilst redistributing modal share from the private car to public transport through improvements to the public transport networks in line with CMATS.

In view of the greenhouse gas (GHG) emissions from transport (which are second only to agricultural emissions), and the energy use relating to transport (highest energy use by sector, accounting for 43% total final consumption in 2017), it will be essential for your authority to achieve a significant modal shift in your functional area (in conjunction with Cork County Council for the wider metropolitan and county areas) away from the private car, in order to meet the requirements under section 10(2)(n) of the Act.

In view of same, the Office requests that the draft plan includes broad targets for modal shift to be achieved over the plan period, subject to implementation of CMATS and against up to date baseline data on modal split for specific geographical locations.

Such targets should be aligned to relevant implementation measures in relation to mandatory objectives which the development plan must include regarding reductions in greenhouse gas emissions and energy use, as required under section 10(2)(n) of the Act. This approach would be consistent with the requirement, under RPO163 Sustainable Mobility Targets, that planning authorities set complementary sustainable mobility targets in development plan reviews.

A thoroughly considered, integrated land use transport approach will be essential if your authority is to attain sustainable compact settlements which meet the '10-minute' city and town concepts in line with RPO176 and referenced throughout the RSES. The implementation of the '10 minute' city / settlement will help implement the Avoid-Shift-Improve approach to modal change. It will also require a proactive, infrastructure-led approach to the promotion of active modes, such as is proposed under CMPO17.

In this regard, the requirements relating to walking and cycling, under RPO174, may be seen as crucial to achieving the '10 minute' city concept. Commitment to the proactive implementation of the *Design Manual for Urban Roads and Streets* (revised 2019) in the required locations, consistent with RPO151, will also assist sustainable and active transport modes, in addition to improvement of the street environment and overall quality of life of urban areas and settlements of all sizes.

In addition, the Office notes the Framework for the Integration of Transport Planning with Spatial Planning Policies under section 6.3.3.2 of the RSES, and the hierarchy of plans and strategies set out in Table 6.1, against which transport policy in the SRA area is formulated and implemented. This includes Local Transport Plans for other towns within the MASP as identified by the planning authority (RPO157 refers).

### Climate Action and Renewable Energy

### **Climate action**

The Office welcomes the acknowledgement of climate change in the Issues Papers (section 5.0) as one the key issues to be addressed in the development plan, and the referencing of the Government's Climate Action Plan 2019, which supports the adoption of a net zero target for carbon emissions by 2050 at EU level. The overall reduction of carbon emissions and energy use will necessarily be a cross-cutting planning policy issue to be addressed in the development plan.

Your authority will be aware that the Office is required under section 31AM(2)(a) of the Act to address, in particular, the legislative and policy matters within the scope of section 10(2)(n) in its evaluations and assessments of your authority's development plan. This subsection concerns the

inclusion of objectives for the promotion of sustainable settlement and transport strategies for both urban and rural areas, which include the promotion of measures to reduce energy demand, to reduce GHG emissions and to adapt to climate change through, in particular, the location, layout and design of new development.

In this regard, the implementation of the Climate Change Adaptation Strategy by your authority would contribute to your authority meeting the requirements under the Act. It is important that climate adaption and mitigation measures are mainstreamed into the development plan. In this regard, the Office notes the recognition of flood risk as a critical issue within your authority's functional area. Your authority's Issues Papers clearly indicate your authority's intention to address the relevant environmental assessments and obligations during the plan making process, including the critical issue of Strategic Flood Risk Assessment.

Regarding climate change mitigation measures pertinent to section 10(2)(n) of the Act, the objectives of the RSES under section 6.35 *Regional Policy Objectives for the Integration of Transport and Spatial Planning Policies* (in addition to NPO28, NPO30, NPO54 and NPO64) and under section 1 *Climate action and transition to a low carbon economy* of Chapter 5 of the RSES are relevant. As noted, above, the objective (RPO176) to attain compact settlements within the '10-minute' city and town concept is also consistent with the requirement for sustainable settlement and transport strategies under section 10(2)(n) of the Act.

Your authority is required to ensure that the development plan provides sufficient clarity and certainty in terms of the measures proposed under section 10(2)(n) to direct the preparation of future local area plans made consequent to the development plan. In this regard, the Office would strongly advise that all land use zoning objectives for your functional area should be included as part of the development plan rather than delayed to the preparation of local area plans.

The Office understands that forthcoming updates by the Department to the section 28 *Development Plan Guidelines* will initiate a process of enhanced guidance for the preparation of development plans. This will include guidance on the requirements under section 10(2)(n) of the Act.

### **Renewable Energy**

Your authority will note that both the NPF (NPO55) and the RSES (inter alia, RPO221) promote and support renewable energy generation, which will contribute to achieving a net zero carbon economy by 2050.

While the scope for wind energy deployment in the area of the city council may be limited, your authority's attention is nonetheless drawn to relevant parts of the *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change and Wind Energy Development Guidelines 2006 – Update on Review (July 2017),* subject of Circular Letter PL 5/2017. The above guidelines require that development plans indicate how their implementation will

contribute to realising overall national targets on renewable energy and climate change mitigation and are worth considering in the context of the next development plan for Cork City.

## Summary

In conclusion, the Office would commend your authority on the range of key issues considered in its Issues Papers and to its approach to engagement with the public, including through webinars and public surveys.

The significance of the forthcoming plan period cannot be overstated, presenting the challenge for your authority to plan for a fivefold increase in the functional area and encompassing a greater range of urban and rural geographical and socio-economic contexts. The next Cork City development plan presents both new opportunities and challenges in implementing the transformation of the city and, with Cork County Council, the wider Cork Metropolitan Area in line with Government policy under the National Planning Framework and the Regional Spatial and Economic Strategy, as a counterweight to the dominance of the Dublin City region, along with Galway, Limerick and Waterford cities.

In summary, the Office would advise that your authority to pay particular attention to the following issues in the formulating of the development plan.

- Firstly, your planning authority will need to be clear as to the purpose of the proposed development plan within the context of the long-term targets for population and economic growth for Cork City, and the infrastructure that will be required to be put in place in order to facilitate that growth. What appropriate development can be accommodated over the plan period and what steps can be put in place over that period to enable the city to meet its longer term targets?
- Your authority's proposed infrastructure assessment study should consider the realistic projected timeframe and cost of delivery of key enabling infrastructures for the strategic residential and regeneration areas, and strategic employment locations identified under the Cork MASP, in addition to the availability of funding, and the body responsible for implementation of the said infrastructure.
- Consideration should be given to scenario planning and resilience measures in devising the development plan, by explicitly considering the uncertainties in facilitating development of the aforementioned strategic areas. For example, in the event that the infrastructural needs of certain strategic areas, such as the Cork City Docks, cannot feasibly be met in the short term, what alternative areas will be developed consistent with compact growth targets, under the NPF and RSES, to ensure delivery of the core strategy over the proposed plan period?

- Specific and measurable objectives for urban infill / brownfield development will be key (RPO34), allied to specific rejuvenation priorities (RPO35), to ensure the achievement of compact growth and regeneration under the NPF, the RSES, and the Cork MASP area, including the requirement that at least 50% of new homes be provided on brownfield land or as infill development.
- Appropriate investment of resources into the preparatory work underpinning the new city plan will be key including the preparation of the Strategic Integrated Framework for Cork Harbour, a fully comprehensive Joint Retail Strategy in accordance with section 28 guidelines, the Joint Housing Strategy and the Metropolitan Open Space, Recreation and Greenbelt Strategy.
- The implementation of integrated land use transport planning (RPO151), in coordination with the neighbouring planning authorities will also be very important, including provision of clear policy support for the implementation of the CMATS, and inclusion of clear local planning objectives as required by the RSES (RPO152).
- Finally, it is critical that the plan includes practical and measurable objectives for promoting sustainable settlement and transport strategies, reductions in greenhouse gas emissions, reduced energy usage and adaptation to the effects of climate change, in particular, through the location, layout and design of new development, including targets for modal change over the plan period and provisions for monitoring over the plan period. In this regard the Office would advise that climate mitigation and adaptation measures are mainstreamed into the development plan and that the plan provides sufficient clarity in terms of objectives and measures proposed under section 10(2)(n) to inform future LAPs within your functional area. The Office would also advise that all land use zoning is included at development plan stage.

The Office looks forward to reviewing the future draft development plan and is committed to continued positive engagement with your authority in implementation of national and regional policies at county and local level.

Please feel free to contact the staff of the Office in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through the undersigned or at plans@opr.ie.

Yours sincerely,

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