

28th May 2025

Strategic Planning and Heritage,
Planning and Integrated Development Directorate,
Cork City Council,
City Hall,
Anglesea Street,
Cork, T12 T997.

Re: Proposed Variation No. 2 to the Cork City Development Plan 2022-2028

A chara,

Thank you for your authority's work in preparing Proposed Variation No. 2 (the proposed Variation) to the Cork City Development Plan 2022-2028 (the City Development Plan).

As Cork City Council (the Planning Authority) is aware, a key function of the Office of the Planning Regulator (the Office) is the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning. The Office has evaluated and assessed the proposed Variation under the provisions of sections 31AM(1) and 31AM(2) of the Planning and Development Act 2000, as amended (the Act) and this submission has been prepared accordingly.

Recommendations issued by the Office relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under section 28. As such, planning authorities are requested to implement or address any recommendations made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

Observations take the form of a request for further information, justification on a particular matter, or clarification regarding particular provisions of a plan on issues that are required to ensure alignment with policy and legislative provisions. Planning authorities are advised by the Office to action an observation.

A submission can also include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. Planning authorities are requested by the Office to give full consideration to the advice contained in a submission.

On adoption of the Variation, the Office will consider whether it has been made in a manner consistent with the recommendations of the Office and whether the plan sets out an overall strategy for the proper planning and sustainable development of the area concerned.

Overview

Cork City Docklands (the City Docks), at over 160 ha and comprising both the north and south parts of the City Docks, is recognised at both a national and regional level as being one of the most significant urban regeneration schemes in Ireland. The National Planning Framework (Revised NPF) reflects the ambition to deliver large-scale regeneration projects for new employment, housing and supporting infrastructure at the City Docks, including the relocation of two Seveso sites. The City Docks is also reflected in the Cork Metropolitan Area Strategic Plan as a very significant urban regeneration scheme.

Through this proposed Variation, the Planning Authority is seeking to regenerate a substantial, strategically located Brownfield site immediately adjacent and to the east of Cork City as a sustainable, vibrant, mixed-use extension of the city centre that benefits from its waterfront location and access to public transport networks (both existing and proposed). The planned population growth for the City Docks of up to 10,000 homes and employment growth of c. 25,000 jobs is substantial. The City Docks could accommodate 20% of the city's future population to 2040, building on its critical mass as Ireland's second city and creating more balanced regional growth within the Southern Region and the State.

Significant sustainable transport projects are planned for Cork that would directly benefit the City Docks and provide significant opportunities for further reductions in car-based travel as projects including the Cork Light Rail project, BusConnects Cork and new cycling and pedestrian infrastructure, are being delivered.

To date, Urban Regeneration and Development Fund's funding to the value of €353 million has been allocated for enabling infrastructure at the City Docks including new bridges, strategic streets, flood protection, extensive waterfront public realm, community infrastructure and a network of public open spaces.

The Office welcomes the overall approach of the Planning Authority in the preparation of the proposed Variation, which will inform the design and implementation of public infrastructure projects and private development to support proposed strategic infrastructure, and in addressing the NPF and the Regional Spatial and Economic Strategy (RSES) in accordance with section 13 of the Act.

The small number of recommendations and observations in this submission focus on strengthening certain aspects of the proposed Variation to provide greater certainty and flexibility around certain aspects of the proposed City Docks development.

Separately, the Office notes that parking standards were amended as part of Variation No. 1 to the Cork City Development Plan 2022-2028 (Variation No. 1). The Planning Authority committed to reviewing the revised parking standards one year following the adoption of Variation No. 1, on 8th May 2023. The Office strongly encourages the Planning Authority to initiate the process of reviewing these parking standards, especially given that significant investment for more sustainable modes of transport is proposed for Cork City generally and the City Docks area specifically, where an overall reduction in the requirement for parking spaces would be expected.

The submission below has been prepared to provide a strategic level input to the Planning Authority in finalising the proposed Variation. It is within the above context that this submission sets out one (1) recommendation and two (2) observations under the following key themes:

Key theme	Recommendation	Observation
Consistency with development plan and core strategy	-	Observation 1
Transport	-	Observation 2
Implementation and Monitoring	Recommendation 1	-

1. Consistency with development plan and core strategy

The City Development Plan has identified 14.4 ha of underutilised lands at the City Docks which has a potential yield of 2,238 housing units. Of these, 988 are identified as Residential Tier 1 and 1,250 are identified as Residential Tier 2. The Planning Authority has also identified 7,775 units as long-term strategic housing development at the City Docks.

The proposed Variation contains nine mapping updates which include eight zoning changes. In summary, the proposed changes would provide for the protection of existing and proposed infrastructure and utilities (change nos. 2 and 7), accommodation of landing areas for proposed bridges (change nos. 5 and 9), provision of public plazas and amenity spaces (change nos. 4 and 8) and an extension to sports facilities (change nos. 1 and 6). Change no. 3 relates to the addition of walkways and cycleways over the primary land use of amenity and residential neighbourhoods.

Related to the above, the Office also notes Volume 1 of the City Development Plan (cross referenced in section 2.3 of the proposed Variation) where new development in the City Docks is expected to generally range from four to six storeys, having regard to a range of factors including: potential gateway locations; transport hubs; the potential impact on local heritage assets; and the general character of the area. The Office notes that the overall height range in Volume 1 is retained with heights distributed throughout the City Docks to aid placemaking and legibility.

The character areas that are presented in chapter 4 are commended and illustrate where key infrastructure and transport corridors are likely to be located within each of these areas. Of particular note are the 'key information' tables presented which include such information as target dwellings per hectare and building height ranges.

While the character areas provide a summary table that includes information on target dwellings and building height, the Office strongly advises that the Planning Authority prepares a summary table detailing the overall, revised housing targets envisaged for the City Docks area.

Observation 1 – Alignment with the core strategy

In the interests of clarity and the implementation of the adopted core strategy, and in particular:

- NPO 4 of the Revised NPF (population target for Cork City);
- Cork Metropolitan Area Strategic Plan Policy Objective 1 (regeneration of Cork City Docklands); and
- Policy Objective 2.27 of the Cork City Development Plan 2022-2028 (the City Development Plan) (implementation of the core strategy),

the Planning Authority is advised to prepare a summary table that sets out the site area, density and anticipated housing yield for each of the character areas as set out in the City Development Plan with respect to both Tier 1 and Tier 2 potential yields.

2. Transport

The proposed Variation proposes three bridges as part of the City Docks development, each with a different function. The Kent Station bridge (to the west) will connect the transport hub on north part of the City Docks (as envisaged under Cork Metropolitan Area Transport Strategy 2040) with the south part of the City Docks. The transport hub would comprise existing rail, future light rail and bus. The Kent Station bridge will also accommodate pedestrians and cyclists. The central Active Travel bridge will connect the old shipyard on north quays with the new Blue Green Infrastructure route through the south part of the City Docks and will accommodate pedestrians and cyclists, while the Eastern Gateway bridge connection between the Lower Glanmire Road, north of the City Docks, and Monahan Road, south of the City Docks, will be the only proposed bridge that will provide for private modes of transport along with public transport, pedestrians and cyclists. Section 3.6 of Appendix C of the proposed Variation states that ‘the Kent Station public transport bridge will be prioritised for delivery’.

As part of the future development of the City Docks, specifically in relation to the multi-modal transport interchange at Kent Station, the Office notes that map change no. 7 proposes zoning changes over which a realignment of Horgan’s Quay is proposed.

Similarly, there are a number of routes within the south part of the City Docks that are proposed to accommodate BusConnects as presented within the detail of the Character Areas (including Figure 6.4.1 and Figure 6.4.4).

Prior to the formalisation of any sustainable travel route however, the Office strongly recommends that the Planning Authority liaises with the National Transport Authority (NTA) in order to ensure that the realigned road at Horgan's Quay takes into consideration the design of the proposed transport interchange at this location. Similarly, the Office strongly recommends that the Planning Authority liaises with the NTA in relation to the proposed BusConnects routes, particularly within the south part of the City Docks area so that sufficient flexibility is provided for in relation to the preferred routes (including reservation corridors as appropriate).

It is unclear from Figure 10.5 (AM Peak Mode Share) what the target year is for the envisaged 75:25 modal split in favour of public modes of travel. However, having regard to the wording of paragraph 10.129 the Office advises that Figure 10.5 be reviewed and revised, if appropriate, to reflect the split in the various modes of travel up to 2040.

Observation 2 - Transport

Having regard to:

- NPO 10 of the Revised NPF (Transport Orientated Development);
- RPO 9 of the RSES (delivery of sustainable travel infrastructure);
- RPO 91 of the RSES (modal shift to sustainable transportation); and
- Cork Metropolitan Area Strategic Plan Policy Objective 8(c) (infrastructure for sustainable travel modes),

the Planning Authority is advised to:

- (i) include appropriate text in the written statement which ensures that the Planning Authority liaises with the National Transport Authority prior to agreeing:
 - (a) the realigned Horgan's Quay route in north part of the City Docks; and
 - (b) the BusConnects routes (and reservation corridors as appropriate) in south part of the City Docks; and

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|---|
| (ii) review and update Figure 10.5 (AM Peak Mode Share) to reflect the split in the various modes of travel up to 2040. |
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3. Implementation and Monitoring

Section 4.15 of the City Development Plan identifies the City Docks (and Tivoli) road network and bridges as being deliverable in both the medium (up to 2031) and long term (up to 2040).

The Office that table 10.14 sets out the various strategic elements of the City Docks Infrastructure and Delivery Programme, while table 10.15 presents an overview of the intended phasing to deliver these elements required for the City Docks over three time periods up to 2040. It is further noted in the written statement (paragraph 10.129) that ‘the actual timing for the completion of each tranche will be subject to a wide variety of factors. Cork City Council’s target is to achieve the build-out of the City Docks between 2021 and 2040 but recognises that this may not be achievable’.

Notwithstanding the above the Office would welcome greater clarity around the phasing programme (as much as possible and in consultation with key infrastructure providers) to better understand which of the proposed strategic elements of the City Docks are likely be delivered along with an associated timeframe (noting that this timeframe may be subject to change). This approach would greatly assist with monitoring the progress of plan objectives (which comes across particularly strongly in the Revised NPF).

For example, in order to reflect the prioritisation of the Kent Station public transport bridge, it would be expected that tables 10.14 and 10.15 would reflect this project being a priority. Similarly, greater clarity could be provided on which ‘bus services’ are referenced under Tranche 1, or which community infrastructure elements are intended under any of the three tranches.

Updates to both tables 10.14 and 10.15 would then align with paragraph 10.127 where it is stated that the Planning Authority has a clear understanding of the infrastructure programme and the infrastructural projects that are necessary to unlock the potential of the City Docks and the introductory paragraphs of chapter 4 where it is stated that a robust framework ‘will enable individual strategic infrastructure projects to be sequenced and delivered in parallel’.

NPO 108 of the Revised NPF places an emphasis on developing and implementing a programme of monitoring of the Revised NPF with a focus on a range of objectives including infrastructure delivery. As such, updates to tables 10.14 and 10.15 would align with this objective.

Recommendation 1 – Implementation and Monitoring

Having regard to the need to provide greater clarity with respect to the timing of each of the strategic infrastructural elements for the development of the Cork City Docklands (the City Docks), and in particular to:

- NPO 108 of the Revised NPF (monitoring of the NPF with respect to infrastructure delivery);
- Cork Metropolitan Area Strategic Plan Policy Objective 1 (infrastructure delivery); and
- Policy Objective 10.35 of the Cork City Development Plan 2022-2028 (the City Development Plan) (the City Docks infrastructure programme and delivery strategy),

the Office recommends that the Planning Authority:

- (i) reviews and updates tables 10.14 and 10.15, in consultation with all relevant stakeholders; and
- (ii) having regard to the above, the Office also recommends that a consequent change should be made to the table in section 4.15 of the City Development Plan, particularly in relation to the delivery of the Kent Station bridge at the City Docks.

Summary

The Office requests that your authority addresses the recommendations and observations outlined above. As you are aware, the report of the Chief Executive of your authority prepared for the elected members under section 13 of the Act must summarise these recommendations and the manner in which they will be addressed.

At the end of the process, your authority is required to notify this Office within **five working days** of the decision of the Planning Authority in relation to the proposed Variation. Where your authority decides not to comply with the recommendations of the Office, or otherwise makes the plan in such a manner as to be inconsistent with the recommendations made by this Office, then the chief executive shall inform the Office and give reasons for this decision.

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 plans@opr.ie.

Is mise le meas,

A handwritten signature in black ink, appearing to read 'AM O'Connor'.

Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluation

Designated Public Official under the Regulation of Lobbying Act 2015