

Southern Regional Assembly
Assembly House,
Waterford,
X91 F8PC

rses@southernassembly.ie

10th October 2019

By email

Dear Sir / Madam

Re: Submission on Draft RSES Material Amendments

1.0 Introduction

Thank you for your request for submissions to the Material Amendments to the Draft RSES.

Temporis, through holding companies, are a significant land holder in the Cork Metropolitan Area. With a land holding that, subject to density and build out over the coming 10 – 15 years, that has the capacity to deliver directly, or through infrastructure provision, enable the construction of 3000 – 5000 residential units and other mixed use areas, schools, amenity spaces and public infrastructure in the Ballyvolane area of Cork City. Consequently, we are encouraged to see such a positive view presented for both the Region, Cork City and its Metropolitan Area.

As our primary landholding is within the North Environs - Kilbarry-Blackpool area and is a central part of the provision and delivery of infrastructure to serve the Urban Expansion Area of Ballyvolane, we welcome the Draft RSES emphasis on infrastructure and CMATS.

We do however have a series of observations and suggestions with respect to the Draft RSES Material Amendments.

2.0 Material Amendment 110

Summary

We submit that the Material Amendment 110 is changed to encourage positive engagement by all parties in design solutions that support public transport. Material Amendment 110 states that it;

“strengthen(s) Cork MASP Policy Objective 9: Strategic Road Network Improvements to support investment in the strategic road network, sustainable transport and the Cork Metropolitan Area Transport Strategy.

We ask that added text is introduced (**in bold**) which sees it read as below.

*“seek delivery of the following subject to the outcomes of required appropriate project appraisal, planning and environmental assessment processes including SEA/AA as appropriate. The upgrade of public transport networks must be the priority for strategic road network improvements under this objective. **All proposals that facilitate the implementation of public transport networks will be supported**”.*

This would encourage public transport and modal choice provisions in proposals.

Material Amendment 110 is presented as being to;

“strengthen(s) Cork MASP Policy Objective 9: Strategic Road Network Improvements to support investment in the strategic road network, sustainable transport and the Cork Metropolitan Area Transport Strategy.

We support the change to the RSES insofar as it now seeks *“delivery of the following subject to the outcomes of required appropriate project appraisal, planning and environmental assessment processes including SEA/AA as appropriate. The upgrade of public transport networks must be the priority for strategic road network improvements under this objective”.*

Investment in public transport must however go hand in hand with development. Development will not occur in Cork in a manner that will address housing needs if it is constrained by delivery programmes. In many cases the private sector has the capacity to assist the process. To this end we ask that Material Amendment 110 above is changed to read (new text in **“bold”**):

*“seek delivery of the following subject to the outcomes of required appropriate project appraisal, planning and environmental assessment processes including SEA/AA as appropriate. The upgrade of public transport networks must be the priority for strategic road network improvements under this objective. **All proposals that facilitate the implementation of public transport networks will be supported**”.*

We also welcome the change to the RSES that states that the RSES is proposing to advance *“investment in orbital transport corridors”*. These are critical to the development of the City, implementation of CMATS and the development of the Northern Environs in particular.

3.0 Material Amendment 107

Summary

Material Amendment 107 is presented as being to;

“to support higher density to enable improved public transport networks”.

We ask that added text is introduced (**in bold**) which sees it read as below.

“a. It is an objective to seek sustainable delivery of enablers as identified in the NPF/NDP for the Cork Metropolitan Area and to progress co-ordination between the principal stakeholders, subject to the recommendations of CMATS (see Section 4.0) and required feasibility, planning and environmental assessment processes. Identification of suitable sites for regeneration and development should be supported by a quality site selection process that addresses environmental concerns and high-quality design to drive increased, **commercially viable**, density enabling the roll out of sustainable public transport solutions”.

This would reflect the need for delivery of residential in particular to be commercially viable. We are not asking that viability is seen as the only driving principle, we simply ask that the RSES recognise that delivery has to reflect commercial realities; we ask this in the interest of equity in the same way that the RSES supports other commercial challenges, i.e. the Cork Events Centre¹ as it can be arguably maintained that residential provision is more important than an event centre.

Material Amendment 107 is presented as being to;

“to support higher density to enable improved public transport networks”.

The Amendments go onto state that:

“It is proposed to make amendments to Cork MASP Policy Objective 6: National Enablers as follows:

a. It is an objective to seek sustainable delivery of enablers as identified in the NPF/NDP for the Cork Metropolitan Area and to progress co-ordination between the principal stakeholders, subject to the recommendations of CMATS (see Section 4.0) and required feasibility, planning and environmental assessment processes. Identification of suitable sites for regeneration and development should be supported by a quality site selection process that addresses environmental concerns and high-quality design to drive increased density enabling the roll out of sustainable public transport solutions”.

It is clear from the EY / Cork Chamber of Commerce Report, *Viability and Affordability of Apartment Building in Cork City* (Image 1) that viability is key issue in the delivery of commercial apartment schemes that are suited to residential uses that are other than Students Apartments of PRS models.

¹ Material Amendment 117

Even within Cork, there are different commercial markets with areas in the central and southern areas of the City being more commercially viable than the north of the City. Given this fact, we ask that the proposed change is altered to state that changed to read (new text in “**bold**”);

“a. It is an objective to seek sustainable delivery of enablers as identified in the NPF/NDP for the Cork Metropolitan Area and to progress co-ordination between the principal stakeholders, subject to the recommendations of CMATS (see Section 4.0) and required feasibility, planning and environmental assessment processes. Identification of suitable sites for regeneration and development should be supported by a quality site selection process that addresses environmental concerns and high-quality design to drive increased, **commercially viable**, density enabling the roll out of sustainable public transport solutions”.

High densities do not create more viable schemes. Very High densities only create higher costs that are passed through to the purchaser increasing the challenge of purchase and the challenge of unit delivery. In summary high density can hinder actual delivery. We are not asking that viability is seen as the only driving principle, we simply ask that the RSES recognise that delivery has to reflect commercial realities; we ask this in the interest of equity in the same way that the RSES supports other commercial challenges, i.e. the Cork Events Centre².

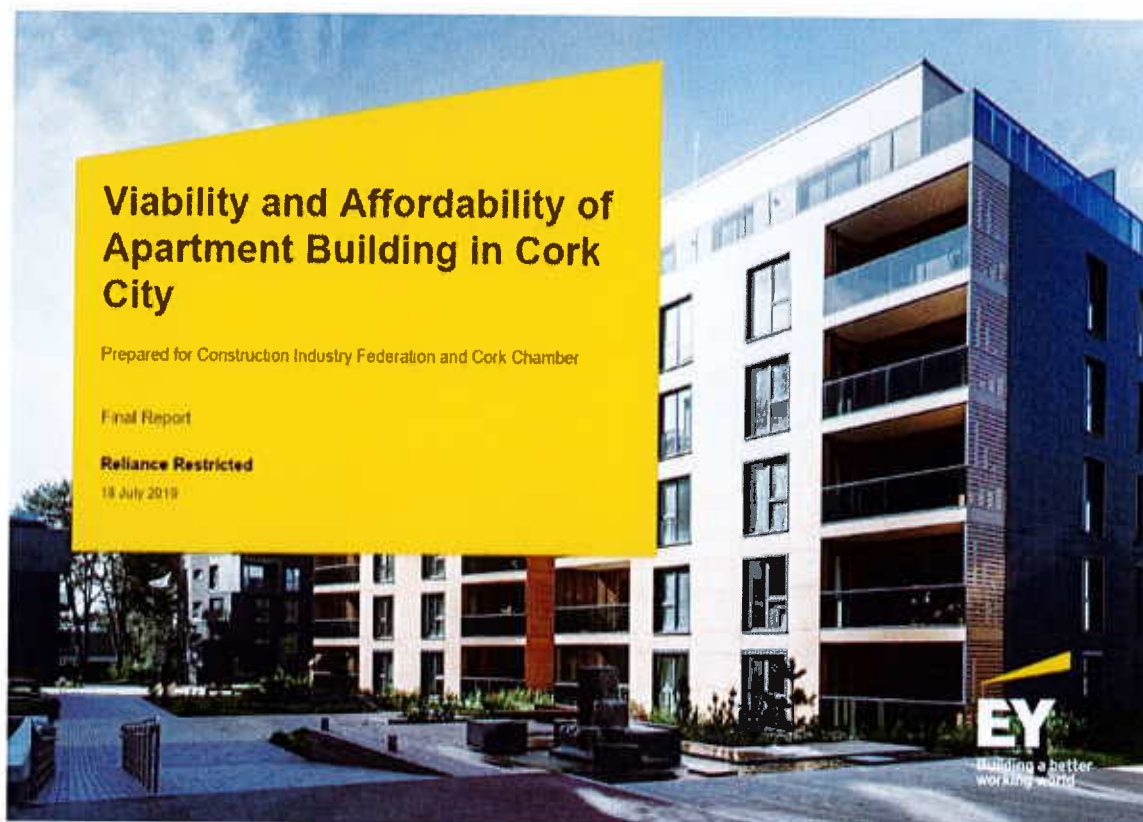


Image 1: EY / Cork Chamber of Commerce Report, *Viability and Affordability of Apartment Building in Cork City*

² Material Amendment 117

4.0 Metropolitan Greenbelt

Summary

We ask that the Draft Material Amendment 117 is altered (**change in BOLD**) and that *Cork MASP Policy Objective 17: Metropolitan Open Space, Recreation & Greenbelt Strategy*, is modified as follows;

*“It is an objective to achieve a healthy, green and connected metropolitan area through the preparation of a Metropolitan Open Space, Recreation and Greenbelt Strategy **before identifying any Strategic Land Reserve Areas that extend key village locations**. This will require co-ordination between relevant stakeholders to deliver the sustainable development of parks, recreation and high quality public open space in the Cork Metropolitan Area”³.*

While the Members in adopting the Draft Changes removed a version of the above change, we submit that referring to “key villages” manages the limitation that may be perceived.

The proposed change simply informs the current SLR process as the adoption of the SLR’s will require a Material Variation of the Cork County Development Plan and therefore cannot undermine the Core Strategy.

Cork County Council is currently going through a process of reviewing Strategic Land Reserves⁴ and how they may contribute to housing provision and *inter alia*, urban development / expansion and the delivery of objectives under the NPF.

We note that Page 212 of the Directors Report (Draft Regional Spatial & Economic Strategy Director’s Report) states that (new text in “**bold**”):

“It is an objective to achieve a healthy, green and connected metropolitan area through the preparation of a Metropolitan Open Space, Recreation and Greenbelt Strategy. **before identifying any future Strategic Land Reserve Areas**. This will require co-ordination between relevant stakeholders to deliver the sustainable development of parks, recreation and high quality public open space in the Cork Metropolitan Area and shall be prepared **before the identification of any future Strategic Land Reserve Areas**”.

It is noted that this proposed change was not adopted by the Regional Assembly according to minutes as it would “significantly undermine the current SLR process which originated in the current CDP 2014 Core Strategy”.

It is accepted that the SLR process exists in Cork County Council. The proposed change, which reflected a submission by this office, would have been positive from a land management viewpoint. Our proposed change would not seek to inhibit SLR’s being identified in their entirety. It, simply put, only sought to limit it in key village locations, not towns, suburban or City locations where sequential expansion can be expected. The basis of this is to ensure that in rural locations where SLR’s are located that one does not have rural / village areas coalescing before a strategy on greenbelts are formulated and that lands are developed in a sequential manner.

SLR areas that lead to continuous urban sprawl and that prejudice existing greenbelt separations should be explicitly discouraged in the RSES (**key village locations**) as premature pending any *Metropolitan Open*

³ Page 246 Draft RSES

⁴ Site Assessment Process

Space, Recreation and Greenbelt Strategy. The yield of these lands can be delivered elsewhere in Midleton and Carrigtwohill areas or other Town locations where lands can arguably meet the tests set out by the Draft RSES for allocating future growth as set out at Page 30 of the Draft RSES where it states that:

“When allocating for future growth in the Core Strategy of each Development Plan Local Authorities should have due regard to the guiding principles, settlement typology and the appropriate policy response taking account of the following:

- Scale of population, and existing performance;
- The extent to which a settlement is located inside or outside one of the three defined City Region catchments;
- Scale of employment provision, number of jobs, jobs: resident workers ratio and net commuting flows;
- Extent of local services and amenities provision i.e. administration, education – particularly higher education institutes, health, leisure and retail;
- Extent to which trips may be made by sustainable modes of travel, i.e. walking, cycling or public transport;
- Rate and pace of past development and the extent to which there are outstanding requirements for infrastructure and amenities;
- Accessibility and influence in a regional or sub-regional context;
- Sub-regional interdependencies, for example, where a settlement may be in relation to several nearby settlements and scope for collaboration including settlements closely adjoining Local Authority boundaries for cross boundary collaboration;
- Character of local geography and accessibility as a service centre for remote and long-distance rural hinterlands;
- Track record of performance and delivery, as well as ambition and initiative and scope to leverage investment;
- Environmental and Infrastructural constraints;
- The appropriate density and scale of development relevant to the settlement scale and location including the differing rates and nature of development experienced;
- The need to provide attractive alternative options to rural housing within smaller towns and villages”.⁵

The above tests clearly support compact growth of existing settlements. While we support the Section 2.3 Guiding Principles of the Cork MASP which seek to “*accelerate housing delivery: Activate strategic residential development areas and support the steady supply of sites to accelerate housing supply and the adoption of performance-based standards to achieve higher densities in the urban built up areas, supported by better services and public transport*” if one dilutes the market by bringing forward “easier to develop” SLR lands, neither the investment nor effort will ever be made to deliver the difficult sites.

We therefore again ask that the Draft Material Amendment 117, is altered (**change in BOLD**) as follows;

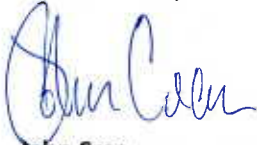
*“It is an objective to achieve a healthy, green and connected metropolitan area through the preparation of a Metropolitan Open Space, Recreation and Greenbelt Strategy **before identifying any Strategic Land Reserve Areas that extend key village locations**. This will require co-ordination between relevant stakeholders to deliver the sustainable development of parks, recreation and high quality public open space in the Cork Metropolitan Area”⁶.*

⁵ Page 30 Draft RSES

⁶ Page 246 Draft RSES

We trust that this is of assistance to the Authority in developing guidance that promotes the sustainable development of the region.

Yours sincerely



John Crean BA Hons MRUP Dip EIA Mgmt MRTPI MIPI

Temporis Limited, Unit 74, Penrose Wharf, Penrose Quay, Cork, T23 HF51
Direct: +353 21 6017636 | Main: +353 21 6010286 | Mob: +353 86 8222896
www.temporiscapital.com | [Twitter](#) | [LinkedIn](#)

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