

Submission to the Southern Regional Assembly

**Proposed Material Amendments to the
Draft Regional Spatial and Economic
Strategy for the Southern Region**

Cork City Council

October 2019



Comhairle Cathrach Chorcaí
Cork City Council

1.0 INTRODUCTION

Cork City Council welcomes the opportunity to make a submission to the Proposed Material Amendments for the Draft Regional Spatial and Economic Strategy for the Southern Region, published 12th September 2019.

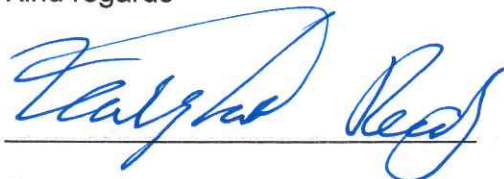
Cork City Council wishes to acknowledge that the Draft RSES supports the ambitious objectives and targets set out for Cork City and Cork Metropolitan Area in the National Planning Framework (NPF) and its role as an emerging international centre of scale to complement Dublin and as a medium-sized European City of growth and innovation.

The level of growth assigned to Cork City and suburbs in Project Ireland 2040 and Draft RSES is welcomed, as is the acknowledgment that a range of enablers will be required for that level of growth to be satisfactorily achieved. Building on the asset base which already exists, Cork's potential as a National and Regional driver of growth can be realised through policy commitment to, and investment in, the required infrastructure and other supports.

In reviewing the proposed material amendments to the Draft RSES for the Southern Region, some were noted as being more significant in nature to Cork City Council than others. In order to assist in this regard, this report is divided into those submissions Cork City Council considers as being significant and those considered as being more minor in nature. A list of specific comments on each amendment considered significant is provided for to give more detail to these issues.

I request that you take account of the issues raised in the submission in advance of the finalisation of the RSES and MASP. Should you require any clarifications on the above points, please do not hesitate to contact me.

Kind regards



Fearghal Reidy,
Director of Services, Strategic and Economic Development,
Cork City Council

2.0 SUBMISSION/COMMENT ON SIGNIFICANT MATERIAL AMMENDMENTS

2.1 Material Amendment 4:

3.4 Cities – Metropolitan Areas p.7 *“New RPO B: Collaboration between Metropolitan Areas It is an objective to establish a collaborative approach between Metropolitan Areas of Cork, Limerick/Shannon, and Waterford (together with Galway): that they lead in partnership with each other to harness their combined potential as viable alternatives to Dublin. The Southern Region’s Metropolitan Areas should be prioritised for focused and long-term investment as the region’s most significant economic engines to ensure regional parity (together with Galway) and to act as an effective counter-balance to the unbalanced growth of Dublin. Central to the success of this collaborative approach is the early delivery of the M24.”*

2.1.1 Comment:

The NPF and the Draft RSES both set out an ambitious vision for Cork Metropolitan Area, with section 4.3 of the NPF stating that *“Cork is emerging as an international centre of scale and is well placed to complement Dublin, but requires significantly accelerated and urban-focused growth to more fully achieve this role.”* Reflecting this, the new objective above needs to ensure that investment in the Metropolitan Areas within the region is prioritised in line with the NPF’s strategic objectives and population targets.

The objective also highlights the early delivery of the M24 as being *“central to the success of this collaborative approach”*. The M24 project is listed as a “pre-appraisal” project in the NDP however there are other strategically important investment projects for the region in the context of the NPF (e.g. the delivery of the M20, Bus Connects Cork projects, high speed broad band roll out, etc.). Identifying a singular roads investment project as being of central importance is misleading and out of context with the overall strategic nature of this objective and would be out of context with the strategic objectives and investment priorities set out in the NPF and NDP. No specific projects should be listed should be listed here as they are well covered elsewhere in the document. If it is decided to retain the reference to the N24, then the other strategic projects would need to be included as well..

2.1.2 Submission/Observation:

To revise the above text as follows: *.It is an objective.....alternatives to Dublin. ..The Southern Region’s Metropolitan Areas should be prioritised, **in line with the NPF’s strategic objectives and population targets**, for focused and long-term investment as the region’s most significant economic enginesas ~~the region’s most significant economic engines~~ to ensure regional parity (together with Galway) and to act as an effective counter-balance to the unbalanced growth of Dublin.*

To insert the following text *Central to the success of this collaborative approach is the **government’s commitment to the planned delivery of the M20 linking Cork, Limerick and onto Galway** and the early delivery of the M24..*

2.2 MATERIAL AMENDMENT 5

The material amendment proposed to RPO 8 includes supporting *“Strategic land reserve initiatives” in Local Authority Core Strategies for the MASP areas, which will achieve the compact growth targets on brownfield and infill sites at a minimum and achieve the growth targets identified in each MASP.*

2.2.1 Comment:

The proposed amendment to support “Strategic land reserve initiatives” in Local Authority Core Strategies should be omitted as it prematurely identifies and prioritises unzoned land parcels within Cork MASP in the absence of an overall review of both City and County core strategies. Material amendment no.104 (and the addition of policy objective 1d) allows for flexibility in reviewing core strategies in the Cork MASP to achieve compact growth following the extension of the city boundary. All core strategy reviews will involve a reassessment of all available land capacity to consider how best to achieve alignment with the new NPF objectives and population targets. This will involve a detailed assessment of available land areas within both city and county areas for consideration by the executive and elected members and consultation with both state bodies and the general public. It will also involve identifying Tier 1 and Tier 2 type land use zonings in accordance with the NPF (appendix 3), thereby providing a new planning mechanism for the strategic delivery of serviced/serviceable land for development over the lifetime of the new Development plans and beyond. This will therefore involve the replacement for the SLR concept. The reference to “*Strategic land reserve initiatives*” is unnecessary as it will be replaced by the review of the core strategies in line with the NPF requirement to identify Tier1 and Tier 2 zonings in the forthcoming development plan reviews.

2.2.2 Submission/Observation:

To omit the following text from RPO 8: [Strategic land reserve initiatives](#)

Alternatively to replace the text with the following: [Tier 1 \(Serviced Zoned Land\) and Tier 2 \(Serviceable Zoned Land\) to be identified as part of the review of City and County Development Plans in the Region](#)

2.3 MATERIAL AMENDMENT 23

It is proposed to insert a **new RPO** in Section 3.8 as follows: **New RPO C: Inter-Urban Networks as Regional Drivers of Collaboration and Growth** The RSES recognises and supports the role of existing and potential inter-urban networks as regionally significant drivers of collaboration and growth. The RSES supports infrastructure investment and initiatives including enhanced public transport connectivity and optimising the potential for rail freight, to be developed further through Development Plans of the following existing and further networks:

- Metropolitan Area collaboration
- Atlantic Economic Corridor
- Eastern Corridor (Dublin Belfast Economic Corridor extending to Rosslare Europort including Gorey-Enniscorthy-Wexford & network linkage to New Ross/Waterford).
- Waterford-Kilkenny-Carlow-Dublin M9/Rail Network/Axis
- Kerry Hub and Knowledge Triangle
- North Kerry-West Limerick-Shannon Estuary-Clare
- Galway-Ennis-Shannon-Limerick (GSEL)
- North Cork Agri Food Network
- West Cork Marine Network
- Cork Ring Network
- Limerick- Waterford Transport and Economic network/axis

2.3.1 Comment:

The proposed objective lists a number of specific inter-urban networks as being significant drivers for growth and infrastructural investment and initiatives including

enhanced public transport and rail freight. In prioritising any investment, the revised objective needs to recognise the infrastructure priorities out in the NPF/NDP (e.g. the delivery of the M20, Bus Connects Cork projects, high speed broad band roll out, etc) and ensure there is no conflicting prioritisation. The reference to transport and economic network/axis should also refer to Cork-Limerick and Cork-Waterford in order to ensure strong collaboration between the three cities in the region in accordance with NPF and RSES objectives.

2.3.2 Submission/Observation:

To amend the text to read as follows: **The RSES recognises and supports the role of existing and potential inter-urban networks as sub regional drivers of collaboration and growth.....**

To amend the following text:

- **Cork-Limerick, Cork-Waterford and Limerick- Waterford Transport and Economic network/axis**

2.4 MATERIAL AMENDMENT 24

It is proposed to insert additional text in Section 3.8: Networks as follows:

Limerick-Waterford Economic and Transport Corridor

The Limerick - Waterford Economic and Transport Corridor links key regional cities and towns by rail and road and is one the primary networks and economic drivers for the Southern Region. The RSES support enhanced connectivity between the MASP cities by the M24 (potential upgrade of N24 to M24), enhanced rail services including development Limerick Junction as a National Freight Hub. The Corridor is uniquely placed in the centre of the region with a number of large towns in Tipperary along its corridor - Clonmel, Carrick on Suir; Tipperary and Cahir all of which have strong economic, social and cultural associations. The network has been developed and supported through a number of intra-regional economic and tourism initiative including the Munster Vales, Butler trail, Historic Town Walls and the River Suir Blueway. The Corridor is also unique in that it connects the Atlantic Economic Corridor and the Eastern Economic Corridor. The RSES will support the further development and investment in this corridor, building on its connectivity; strong urban framework and economic clustering of activities.

2.4.1 Comment:

The NPF supports the development of two economic corridors to enhance connectivity between regions; the Atlantic Economic Corridor (Kerry to Donegal) and Dublin-Belfast Economic Corridor. There is no objective or reference to any inter-regional economic and transportation corridors. Supporting the delivery of the proposed Limerick-Waterford economic and transport corridors would have significant investment and land use implications that are contrary to the overall investment and land use objectives set out in the NPF and NDP. The role of transport corridors in the region needs to reflect all three cities and be in balance with the transport and economic role of these cities and key towns as centres for economic growth, enterprise, innovation and skills.

2.4.2 Submission/Observation:

To remove the proposed text in Section 3.8

Cork-Limerick, Cork-Waterford and Limerick-Waterford Transport Corridors

To support the role of Transport Corridors connecting the three cities in the region and their roles as economic drivers, connecting the Atlantic Economic Corridor and balancing role of the Eastern Economic Corridor. The RSES will support the

development and investment in these corridors, building on connectivity; strengthening the urban framework and economic clustering of activities in a manner that balances with the role of the regions cities and key towns as critical centres for economic growth, enterprise, innovation and skills while delivering compact growth and sustainable mobility in accordance with the NPF's national strategic outcomes.

2.5 MATERIAL AMENDMENT 27

It is proposed to make amendments to RPO 32: Support for Compact Growth in Section 3.11: Regeneration as follows:

(a): Local Authorities, through Development Plan and Local Area Plan policies, shall identify rejuvenation priorities within our region's settlements which demonstrate achievement of National Strategic Outcome: Compact Growth.

(b): Development Plans shall state a minimum requirement to deliver at least half (50%) of all new homes that are targeted in the region's three Cities and suburbs of Cork, Limerick and Waterford, within their existing built up footprints (brownfield and greenfield) in accordance with NPF National Policy Objective 3b.

(c): Development Plans shall state a minimum requirement to deliver at least 30% of all new homes that are targeted in settlements other than the cities and suburbs, within their existing built-up footprints (brownfield and greenfield) in accordance with NPF National Policy Objective 3c.

2.5.1 Comment:

Tier 1 and Tier 2 type land use zonings are required to be set out in the forthcoming review of City and County Development Plans in accordance with the NPF (appendix 3), thereby providing a new planning mechanism for the strategic delivery of brownfield/greenfield land which is serviced/serviceable land over the lifetime of the new Development plans and beyond. The NPF objective NPO 3 refers to requirement for development 'within the existing built-up footprints' of urban areas. The additional reference in above amendment to "(brownfield and greenfield)" is not included in objective NPO 3(a), 3(b) and 3(c) and should be removed for clarity and consistency

2.5.2 Submission/Observation:

To remove the following text from points (b) and (c) of the proposed amendment:
(brownfield and greenfield)

2.6 MATERIAL AMENDMENT 39

RPO E: Building Resilience to Climate Change p.29

a) It is an objective to support measures to build resilience to climate change throughout the region to address impact reduction, adaptive capacity, awareness raising and emergency planning.

2.6.1 Comment:

Recommend including a reference to 'nature based solutions' in the RPO E.

2.6.2 Submission/Observation:

To amend as follows: a) It is an objective to support measures to build resilience to climate change throughout the region to address impact reduction, adaptive capacity, awareness raising, *providing for nature based solutions* and emergency planning.

2.7 MATERIAL AMENDMENT 60

It is proposed to make amendments to RPO 136: Regional Freight Strategy in Section 6.3.4 as follows: ~~To support the development of Develop~~ a RSES Regional Freight Strategy which includes the consideration of rail freight, ~~the asset of our region's rail network and innovations in the freight handling and transport sector to be prepared by the relevant stakeholders through~~ consultation with the Department of Transport, Tourism and Sports, Transport Infrastructure Ireland, National Transport Authority, Local Authorities, Irish Rail, relevant delivery agencies and the port and airport authorities. ~~Support the feasibility of Limerick Junction having the status of a national rail freight and passenger hub. The implementation mechanisms and monitoring structures to be established following the adoption of the RSES will identify the scope and role of the Regional Freight Strategy and the timescale for its preparation. The requirements of the SEA and Habitats Directives shall be considered, as appropriate, in relation to a Regional Freight Strategy.~~

2.7.1 Comment:

The proposal for development of a Regional Freight Strategy is supported and needs to be developed and considered by numerous bodies to identify a suitable location in the region. The proposal for the objective to support the feasibility of Limerick Junction as a national rail and freight and passenger hub is premature the findings of the proposed RSES Regional Freight Strategy as set out by this objective and is not currently included in the NPF or NDP.

2.7.2 Submission/Observation:

To amend the text as follows: ~~Support the feasibility of Limerick Junction having the status of~~ ~~delivering~~ a national rail freight and passenger hub ~~in the region~~. The implementation mechanisms and monitoring structures to be established following the adoption of the RSES will identify the scope and role of the Regional Freight Strategy and the timescale for its preparation. The requirements of the SEA and Habitats Directives shall be considered, as appropriate, in relation to a Regional Freight Strategy.

2.8 MATERIAL AMENDMENT 72 & 77

Replacement of specific objectives relating to Cork Bus Connects by references to strategic bus network programmes in RPO 155 and RPO 163

2.8.1 Comment:

The proposal to replace the wording "Bus Connects" with the wording "strategic bus network programmes" is confusing. The term Bus Connects is clearly set out in both the NPF and NDP and should be retained for consistency and to avoid any conflict in these prioritised projects of significant importance to the sustainable development of the region.

2.8.2 Submission/Observation:

To retain the wording "Bus Connects" as originally set out in the Draft RSES and not replace with the term strategic bus network programmes as proposed in the amendments

2.9 MATERIAL AMENDMENT 73

It is proposed to make amendments to RPO 158: Investment in Strategic Road Connectivity in Section 6.3.6 as follows:

RPO 158: Investment in Strategic ~~Read Connectivity~~ Inter Regional Multi-Modal Connectivity Between Metropolitan Areas and Within Economic Corridors

b. Strengthen the quality of north to south Cork to Limerick (proposed M20 and Rail) connectivity, east to west Cork to Waterford (N25) connectivity and east to west Limerick to Waterford (potential upgrade of N24 to M24 and Rail) connectivity.

2.9.1 Comment:

The proposed M20 and improvements to the east to west Cork to Waterford (N25) are identified as inter-urban roads projects in the NDP. The M24 project is listed as a pre-appraisal project in the NDP. The amendment would benefit by identifying that these projects are listed in the NDP agreed by Government.

2.9.2 Submission/Observation:

To add/amend the text as follows:

b. Strengthen the quality of north to south Cork to Limerick (proposed M20 and Rail) connectivity, east to west Cork to Waterford (N25) connectivity and east to west Limerick to Waterford (potential upgrade of N24 to M24 and Rail) connectivity, **as identified in the NDP.**

2.10 MATERIAL AMENDMENT 74

The proposed amendments to RPO 159: National Road Projects are as follows:

The provision of the following ~~National Road Related Schemes~~ and projects are also supported as *strategic* regional priorities to achieve NSO Enhanced Regional Accessibility subject to the *recommendations of the three MASPs, the preparation of associated Metropolitan Area Transport Strategies and the preparation of Local Transport Plans for key settlements and other urban centres where applicable.* These measures are also subject to robust feasibility studies and site/route selection to reduce impacts on the environment and required appraisal, planning and environmental processes:

- Cork Northern Ring Road connecting the N22 to the M8 (a complementary scheme to the M20 identified in the NDP *to be assessed as part of an overall transport strategy for the Cork Metropolitan Area. The outcome of the finalised CMATS is required to determine the nature and status of the scheme).*

2.10.1 Comment:

The proposed amendment is noted in that CMATS will need to be fully adopted to confirm many of the strategic and infrastructural transportation objectives set out in the RSES. Notwithstanding this the importance supporting the delivery of the Cork Northern Ring connecting the N22 to M8 as a complementary scheme to the M20 is identified in the NDP and should be retained as a objective for RSES.

2.10.2 Submission/Observation:

To revert back to the existing wording set out in the Draft RSES under this objective for the NRR: *Cork Northern Ring Road connecting N22 to the M8 (RSES supports the Cork Northern Ring connecting the N22 to M8 as a complementary scheme to the M20 as identified in the NDP).*

2.12 MATERIAL AMENDMENT 110

It is proposed to make amendments to Cork MASP Policy Objective 9: Strategic Road Network Improvements as follows:

~~h~~.i. Cork Northern Distributor Road [connecting the N8, all radial distributor roads in the Northern Suburbs and environs of the City, the N20 and the N22](#)

2.12.1 Comment:

The Draft CMATS identifies the Cork Northern Distributor Road (CNDR) as a critical enabler and short term objective to provide additional road network infrastructure on the north side of Cork City. CMATS also proposes that the CNDR provides for connectivity at its western end to join the existing N22 but is not envisaged as connecting to the M8. The wording of the proposed amendment needs to be corrected to reflect this. The role of the proposed CNDR as set out in CMATS should also be reflected including its role as a public transport route and accessing planned development lands.

2.12.2 Submission/Observation:

To correct the wording of this objective

i. Cork Northern Distributor Road [delivering a multi-modal orbital public transport route, accessing planned development lands, connecting to radial distributor roads and providing connectivity at its western end to join the existing N22](#)

3.0 SUBMISSION/COMMENT ON MINOR MATERIAL AMMENDMENTS

3.1 MATERIAL AMENDMENT 50

RPO 126: Air Quality

Submission/Observation:

Recommend the objective also includes supporting action plans to address areas of poor air quality and using nature based solutions as a specific solution to improving air quality.

3.2 MATERIAL AMENDMENT 68

RPO 152: Local Transport Plans

Submission/Observation:

Recommend an additional bullet point to LPT's to read as follows: 'Prioritise the delivery of sustainable and active travel infrastructure'

3.3 MATERIAL AMENDMENT 70

New RPO K: Multi-Modal Travel Integration

Submission/Observation:

Recommend additional bullet points as follows:

- 'Integrated card for bike sharing, bus use, train use and car sharing'
- 'investigate feasibility of Mobility Hubs for major developments or multi-developments sharing the facility.'

3.3 MATERIAL AMENDMENTS 74 + 75

RPO 156 + RPO 160

Submission/Observation:

Recommend adding 'All road infrastructures shall integrate nature based solutions to help reduce the adverse impacts from traffic, air pollution and noise pollution.'

3.4 MATERIAL AMENDMENT 78

RPO 166: Walking and Cycling p.50

Submission/Observation:

Recommend adding 'walking' as well as 'cycle routes' in the following bullet points:

- Safe cycle routes especially in the approach to schools
- Creating a safer environment for cyclists off the arterial roads shall be supported by large scale 30 km/h limits (except for main arterial roads) and adequate junction re-design.
- Greenways in the region shall be linked up to a network to improve connectivity within the region for commuter cyclists in addition to recreational amenity functions.