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**RE: Cork County Development Plan 2022-2028 Pre-Draft Consultation
SRA File Ref: 20/001**

A Chara,

The Southern Regional Assembly (SRA) welcomes the publication of the Cork County Development Plan 2022-2028 Pre-Draft consultation Issues Paper document "Your Home, Your Future, Your Views" and the opportunity to consult with the Council under Section 11 of the Planning and Development Act 2000).

The SRA makes this observation in accordance with Section 27 A of the Act which obliges the Regional Assembly to make submissions or observations regarding a number of matters including:

- Policies and objectives in relation to national and regional population targets.
- Distribution of residential development and related employment with a view to:
 - Promoting consistency as far as possible between housing, settlement and economic objectives of the Draft Plan, Core Strategy and RSES.
 - Assisting in the drafting of the Core Strategy of the Draft Development Plan.
- Objectives of providing physical, economic or social infrastructure in a manner that promotes regional development through maximising the potential of the Region.
- Planning for the best use of land having regard to location, scale and density of new development to benefit from investment of public funds in transport infrastructure and public transport services.
- Collaboration between the planning authority and the Regional Assembly in respect of integrated planning for transport and land use and the promotion of sustainable transport strategies in urban and rural areas.
- Promotion of measures to reduce anthropogenic greenhouse gas emissions and address the necessity of adaptation to Climate Change.

The opportunity to engage with Cork County Council through the pre-draft phase of the process is also important in relation to Section 22 (A) (3) of the Act which requires that public bodies (including local authorities) consult with the regional assemblies, as appropriate, when preparing its own plans to ensure that they are consistent, as far as practicable, with national and regional objectives set out in the National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES). Continued collaboration throughout plan development is welcomed.

Both the RSES and Cork Metropolitan Area Strategic Plan (MASP) were made on the 31st January 2020.

1.0 Overall Observation

The SRA highly commends the approach taken by the Council through the publication of “Your Home, Your Future, Your Views”. The SRA commend the quality of the publication and use of infographics to communicate key issues in this regard. The issues and potential direction for change are clearly set through the publication of background papers online, to engage with the public and stakeholders on the direction for the next development plan. The availability of empirical data and analysis through the background papers is commendable. It facilitates data sharing and good practice exchange between stakeholders to assist policy making and implementation to resolve shared complex challenges. The SRA note the Urban Capacity Analysis as an example of a proactive initiative. The consolidation of processes amalgamating separate County Development Plan, Development Plans for Town Council Towns and Municipal District Local Area Plans is welcomed.

At this stage of the process, the SRA intend to outline high level points. Appendix 1 provides a summary of some of the key Regional Policy Objectives (RPOs) that support the themes raised in the Issues Paper.

It is advised to consult the final published RSES as of 31st January 2020, which may post-date the preparation of content across some background papers and which incorporates strengthened narrative under themes addressed in the pre-draft consultation.

The final RSES and Cork MASP is available through the following link:

<http://www.southernassembly.ie/regional-planning/regional-spatial-and-economic-strategy>

2.0 Ensuring Consistency with the RSES

Under Section 10 (1 A) of the Act, the development plan shall include a core strategy which shows that its development objectives are consistent, as far as practicable, with national and regional development objectives set out in the National Planning Framework, the RSES and with specific planning policy requirements specified in guidelines under subsection (1) of section 28. The following key areas are identified for attention.

Chapter 2 sets out the Strategic Vision and Strategy for the RSES. Section 2.2 The Strategy and the associated Strategy Statements and Key Enablers are particularly relevant including in the context of securing funding sources for the delivery of the Development Plan. The Strategy Statements, Regional Policy Objectives (RPO's) and MASP Objectives are aligned to the National Strategic Outcomes of the NPF.

Chapter 3 references the settlement strategy and I refer in particular to Section 3.2 (Sustainable Place Framework) and Section 3.3 – A Tailored approach and the settlement typology set out in Table 3.2 including:

1. Cork MASP – Section 3.4,
2. Key Towns – Mallow and Clonakilty – Section 3.5
3. Towns and Villages – Section 3.6
4. Rural Areas – Section 3.7, and
5. Networks – Section 3.8.

The Core Strategy should reflect NPF and RSES priorities by positioning the Metropolitan Area as a primary driver for economic and population growth in the Southern Region, supported in turn by the Region's network of Key Towns.

In setting priorities for the metropolitan area, RSES objectives seek active land management initiatives to deliver consolidation of existing settlements and compact growth in the metropolitan area. The distribution of future growth aligned with the principles of integrated land use and transport planning and the Cork Metropolitan Area Transport Strategy (CMATS) is required under RSES Chapter 6 (Connectivity) and Cork MASP Objectives (refer to Appendix 1).

Local Authority initiatives to deliver infrastructure led development and retrofit physical and social infrastructure to improve the quality of life for existing communities in metropolitan towns are also supported by RSES and Cork MASP objectives.

Monard SDZ is identified as a key growth enabler for the Cork Metropolitan Area in both the NPF and Cork MASP as a planned rail based metropolitan town. RSES support for infrastructure packages to service Monard are included under Section 7.3 of the Cork MASP.

The Key Towns (Mallow RPO 19 & Clonakilty RPO 23) play a critical role in underpinning the RSES and ensuring a consolidated spread of growth beyond the cities to the sub-regional level. While Local Authorities are supported in targeting growth of more than 30% in Key Towns subject to capacity analysis, it is important to note that the nature, scale and phasing of growth of each Key Town will be determined by Local Authorities through the Core Strategy.

Through the RSES, Irish Water (IW) Investment Plans must align with the objectives and settlement strategy of the RSES and assist the strategic role played by Key Towns. Collaboration is required between IW and Local Authorities to agree phasing, water and waste water services to accommodate growth in a phased, sustainable manner.

Subject to capacity analysis, RSES Section 3.5 states that some Key Towns may justify significant growth while others may place a greater emphasis on strengthened services, facilities and economic roles.

Regarding RPO 23 Clonakilty and Table 3.3 Key Towns, the Development Plan needs to address the special circumstances of Clonakilty as one of the Region's smaller scaled Key Towns but possessing an important employment and service function for a wide, coastal and peripheral hinterland with scope for economic collaboration across a number of other West Cork Settlements on the N71 Corridor (Skibbereen and Bantry).

After the Cork Metropolitan Area and Key Towns, the distribution of growth across the County's other towns, villages and rural areas is a matter for the Development Plan to address. The RSES does however seek prioritisation (see Section 3.6 Towns and Villages) in the growth allocation for settlements informed by guiding principles as set out under RSES Section 3.3. A Tailored Approach. These principles include:

- Existing scale of population, track record of performance, ambition and scope to leverage investment.
- Rate and pace of past development and extent to which there are outstanding requirements for infrastructure and amenities.
- Scale of employment provision, jobs to resident workers ratios and net commuter flows.
- An evidence base on the availability and deliverability of lands within existing built up footprints in the lifetime of the Development Plan (compliance with NPO 72 of the NPF).
- Extent of local services and amenities provided.
- Extent of sustainable modes of travel that can be encouraged.
- Accessibility and influence in a regional and sub-regional context.
- Accessibility as a service centre for remote and long-distance rural hinterlands.
- Environmental and infrastructure constraints.
- The appropriate density and scale of development relative to the settlement and location.
- Need for attractive, alternative options to rural housing within smaller towns and villages.

In addition, RPO 3 and RPO 26 refer to the need to ‘identify settlements which can play a role at a sub-regional level to drive the development of their areas’.

The RSES strongly supports the development of our rural areas, and Chapter 3 recognises the decline of population and services in many villages and rural areas as a problem of strategic national and regional importance and acknowledges the need for investment in towns and villages to reverse decline and attract population and enterprise growth. Initiatives supported by the RSES to assist renewal include:

- New homes in small towns and villages initiatives.
- Investment in town and village renewal initiatives to improve services and livability to attract population and enterprise growth.
- Coordination between Local Authorities, Irish Water and other stakeholders to deliver investment in water and wastewater treatment services (including Green infrastructure solutions).

The importance of our rural areas is highlighted throughout the RSES including for example rural economic development (see Section 4.5), and rural connectivity (see Section 6.3 RPOs 158 and 172).

The Draft Plan will need to demonstrate priorities based on the above RSES requirements and principles. In setting out the Development Plan Core Strategy to 2028, adherence to NPO 72 (a) to 72 (c) will be required to differentiate between zoned land that is serviced and zoned land that is serviceable within the life of the plan. When considering zoning lands that require investment in service infrastructure, planning authorities are required to include the reasonable cost estimates of delivering required services at both the draft and final plan stages.

3.0 Networks for Collaboration

The RSES identifies the economic role played by smaller scaled settlements for their surrounding rural hinterlands and the opportunities for sharing assets and opportunities(see RPOs 28-30) between different settlements to drive rural economic growth.

In Cork, examples identified include a North Cork Agri-Tech Network and a West Cork Marine Network. Background Paper 6 has referenced the role of these networks for the County’s economic hierarchy. The SRA support initiatives through the Development Plan to harness the potential of such networks.

4.0 Placemaking

A strong emphasis is demonstrated in the Issues Paper and Background Papers on placemaking for both spatial and economic growth. This is strongly supported for the Development Plan and aligns with the Sustainable Place Framework of the RSES (RPO 31).

The growth of compact settlements must be in tandem with infrastructure and facilities that enhances the unique identity and quality of life offer of different places. The need for closer alignment between where people live and work is strongly signaled by the Issues Paper and fully supported by RSES objectives.

Successful placemaking will require sustainable higher densities in our towns and villages to increase activity, support local services and support sustainable mobility.

The RSES supports 10 Minute Towns as a concept whereby a range of community facilities and services are accessible in short walking and cycling timeframes from homes or are accessible by high quality public transport services by connecting people to larger scaled settlements delivering these services. Our urban communities will need sufficient densities to realise the potential of a 10-Minute Town and it’s benefits for placemaking.

The Issues Paper and Background Paper 8 Transport and Mobility identifies the importance of such concepts. A strong emphasis on such initiatives in the Development Plan will be supported by RSES under:

- Section 3.9 Placemaking
- RPOs under Chapter 6 Connectivity
- Chapter 7 Quality of Life, RPO 176 “10-Minute City and Town Concepts”.

The SRA are a partner region in the EU Interreg Europe MATCH-UP project which aims to achieve significant improvements of modal interchange to foster low-carbon urban mobility. An outcome from the project is to set a framework of good practice to implement 10 Minute Town concepts successfully across Key Towns and other settlements in the Region. There are opportunities for settlements in County Cork to be leaders of good practice in our Region for sustainable 10-Minute Town concepts. The important role of Local Transport Plans to help achieve this is noted below in comments for Transport and Mobility.

5.0 Economy and a Smart Region

Aligning the drivers for economic growth with principles of the RSES settlement strategy is welcomed. Opportunities for economic growth across our Region will be achieved by supporting synergies between talent and place, building on identified assets to strengthen enterprise ecosystems and provide quality jobs, re-intensifying employment in existing urban areas, complemented by strategic employment growth in the right locations and diversifying local and rural economies.

Background Paper 6 reflects three out of five key principles that underline the RSES economic strategy (Smart Specialisation, Clustering and Placemaking for Enterprise Development). It is important the Development Plan’s economic policies also integrate Knowledge Diffusion (RSES supports a Learning Region, developing skills, talent and access to life-long learning) and Capacity Building (capacity to bid for funding and to respond to emerging challenges) to secure greater economic resilience across our Region.

As the RSES marries spatial planning and economics, there is a strong emphasis on placemaking for enterprise development i.e. creating attractive places to attract skills and talent. The emphasis on placemaking for enterprise growth in the Issues Paper is supported and should be further developed in the Development Plan. To implement placemaking initiatives, bidding capacity is required to bid for and win competitive funds. Developing this capacity is essential in light of competitive funds available under Project Ireland 2040.

Strengthened connectivity across the region (digital and transportation, especially with a focus on the efficient movement of freight) will enable interaction between regional economic drivers. This includes collaboration across the cities and metropolitan areas, the Atlantic Economic Corridor, Key Towns and our network of towns and villages in addition to efficient freight movement between ports and airports (essential for an island open market economy). RSES Chapter 4 A Strong Economy and Chapter 6 Connectivity both address the importance of digital and transport connectivity to underpin the Region’s economic drivers.

The theme of rural innovation is strongly supported in the RSES. The RSES supports diversity, innovation and a network of viable rural towns, villages and rural areas to ensure economic resilience and job creation. RSES Section 4.5 cites good practice examples for our Region of rural innovation in Cork including the Council’s network of E-Centres, Ludgate Hub and the Teagasc Moorepark Research and Innovation Centre.

Digital infrastructure and smart technologies are critical enablers for economic and social revitalisation. A Smart Region, embedding digital technology across many functions to improve our quality of life, is central to achieving the RSES vision. RSES specifically seeks Smart Cities to be the engines of our Smart Region, where good practices are implemented and extended across our cities, towns, villages and rural areas. Such initiatives will enhance our Region’s competitiveness,

attractiveness and economic resilience. Actions arising from Cork County Council's Digital Strategy 2020 and future iterations should be strongly supported through Development Plan policy.

6.0 Transport and Mobility

The Avoid-Shift-Improve emphasis highlighted in the Issues Paper is supported as the focus for the Development Plan's Transport and Mobility policies. RPO 151 "Integration of Landuse and Transport" and RPO 152 "Local Planning Objectives" underpin this approach.

The background papers have indicated a potential distribution of growth to 2040 across the County, approximately 47% of which will be within the Cork Metropolitan Area. Given the level of growth targeted for metropolitan areas and their role as engines of growth at the top of the Region's settlement hierarchy, the distribution of population and employment growth needs to be transport infrastructure led so employment, housing and other services are better integrated and support sustainable travel.

This is identified as a priority for placemaking in the Issues Paper and is equally a priority for the Region. Alignment of land use and transport policy in the metropolitan area with CMATS is a requirement through RPO 164 "Metropolitan Area Transport Strategies", Cork MASP Objective 7 "Integrated Landuse and Transport Planning" and Cork MASP Objective 8 "Key Transport Objectives subject to CMATS".

There is an opportunity for the Development Plan to maximise the benefit of CMATS through phasing growth, delivery of key transport infrastructure, cost benefit analysis and coordinating different transport stakeholders. Alignment of the Development Plan with RSES and CMATS will underpin a transport infrastructure led distribution of growth in the metropolitan area and help achieve the Council's Avoid-Shift-Improve principles.

Infrastructure to promote active travel modes between metropolitan communities is supported and initiatives through a metropolitan open space and recreation strategy (connecting a network of parks and recreation areas across the metropolitan area through walking and cycling) have support under Cork MASP Objective 17. 0. Support for such initiatives are encouraged through the Development Plan.

Examples such as the Midelton to Youghal Greenway and Lee to Sea Greenway are cited in the RSES for regional support but of equal importance from a regional perspective, smaller, cost effective measures to enhance walking and cycling permeability within and between our settlements have RSES support. RPO 174 especially is a strong support for Local Authority policy and actions to improve walking and cycling facilities within and between settlements.

The SRA equally recognise that over half of the NPF/RSES growth to 2040 for Cork is envisaged outside the Cork Metropolitan Area. Successful integration of employment, housing and services with improved transport infrastructure is therefore a priority issue for other settlements with significant growth will be targeted. The SRA support the role of Local Transport Plans to be prepared for Key Towns and other settlements (RPO 157) .

RSES support for intra-regional rural connectivity and improvements to transport networks along the region's national tourism corridors in Chapter 6 are important for Development Plan policy for strengthened rural connectivity. Road based transport is often the only viable mode for rural and peripheral locations. The County Development Plan should ensure investment in road infrastructure is also framed in economic, social, environmental and sustainable transport terms (the opportunity to strengthen rural public transport and bus networks).

7.0 Marine

The opportunities for the Southern Region under the National Marine Planning Framework (NMPF) are significant, with Cork playing a significant role for our Region to be a first mover under Marine Spatial Planning (RPO 78).

The important roles of the Tier 1 Port of Cork as a driver for national and regional economic growth, in addition to Cork's coastal network of Ports of Regional Significance and National Fishing Harbour Centres are supported by RSES objectives.

The important role of the seafood sector, coastal tourism, offshore renewable energy, research driven clusters in Marine ICT and Biotechnology are all assets in Cork that will drive the marine economy of our Region. These sectors will be central to Marine Spatial Planning and revitalising rural, coastal and island communities. RSES Section 4.9.2 Growing the Blue Economy and Section 6.3.4.2 Our Regions Strategic Port and Harbour Assets are important supports to Development Plan policy on marine potential.

Specifically, a Cork Harbour Planning Framework Initiative to be prepared through the coordination of the Local Authorities and key stakeholders is required under RSES objective 79 and Cork MASP Objective 3. Development Plan support to progress this initiative is strongly encouraged to assist a strong role for Cork and the Region in Marine Spatial Planning.

8.0 Green Infrastructure

The SRA welcome the emphasis on green infrastructure and recommend expanding the reference to Green and Blue Infrastructure (GBI) and also Nature-Based Solutions (NBS). GBI should be a key concept of a local authority's Development Plan, informing actions and strategy around economic development and placemaking.

Local authorities are encouraged to collaborate with appropriate stakeholders and infrastructure delivery agencies to seek opportunities to appropriately design, deliver and manage green and blue infrastructure. An example of innovatively using GBI is the consideration of Integrated Constructed Wetlands as alternatives to waste water network connections for settlements with service capacity issues.

The RSES also states that spatial planning can play a significant role in ensuring that the design of developments prevent and reduce diffuse pollution, including the use of Sustainable Drainage Systems (SuDS). Urban Blue Corridors can provide many benefits including: more effective management of urban flood risk; improved access, additional and more useable public open space, and improved biodiversity. The RSES promotes the guidance document, *Planning for Watercourses in the Urban Environment* published by Inland Fisheries Ireland which provides an integrated watercourse protection strategy. Development Plan policies that support these good practices are strongly encouraged.

The SRA will welcome continued engagement with the Local Authority throughout the pre-draft stage to support these concepts through RSES implementation and learnings from the EU Interreg Europe Blue Green City project. The SRA are a partner region on this project and through it, the SRA will seek to disseminate good practices and knowledge to improve GBI policy and improve the integration of GBI infrastructure in projects throughout the Region.

9.0 Climate Action

The direction of change signaled in the Issues Paper and background reports demonstrate that climate actions are central to policy proposals for people and places, economy and employment, transport and mobility inter alia. This is welcomed and should be reinforced in the draft, similar to the approach of the RSES which places a priority on climate change at the outset of the context and vision for the RSES strategy.

In particular, the SRA strongly recommend support for the initiatives of the Climate Action Regional Offices (CAROs). This will align with RSES support to the role of CAROs under RSES Chapter 5 RPO 88 which states it is an objective to ensure effective co-ordination of climate action with the Climate Action Regional Offices and local authorities to implement the Climate Action Plan, National Mitigation Plan and the National Adaptation Framework in the development and implementation of long-term solutions and extensive adaptation measures.

This is a particular strength for Cork as the lead local authority on the Atlantic Seaboard South CARO. The SRA also recommend an emphasis on proposals for smart and innovative approaches to waste management, promotion of the Circular Economy and opportunities in Biomass.

10.0 Community

The SRA welcome the themes addressed and commitment to delivering social infrastructure and high-quality services for our existing and changing population profiles. Smart aging initiatives, access for all and support for volunteering and active citizenship are important themes to reflect in Development Plan policy.

Retrofitting high quality infrastructure and services to communities who experienced past high rates of growth, but without corresponding physical and social infrastructure to a high standard, is a priority, especially in the Cork Metropolitan Area. It is a key issue identified in both the NPF and Cork MASP. Chapter 7 RPO 175 “Improving Regional Quality of Life Through Infrastructure Led Planning” seeks to tackle such legacies.

The RSES places a strong emphasis on education, skills development and life-long learning, with recognition of a Learning Region status. This designation builds on the success of Cork and Limerick (expanding to Waterford) as UNESCO Learning Cities and the potential to expand such initiatives to urban and rural centres across our region. Through access to learning for all, enterprise growth, social inclusion and job opportunities for all and quality of life is enhanced. Development Plan policies in support of a Learning Region are encouraged.

11.0 Other Comments

Appendix 1 further aligns the main themes presented by the Issues Paper with specific RSES RPOs to support the preparation of the Draft Development Plan. Support for initiatives under energy, heritage and biodiversity themes, in addition to further RPO’s that support the points raised above, are included in Appendix 1.

Conclusion

The SRA welcomes the pre-draft public consultation and commend the Planning and Policy Unit for the robust approach to analysis, evidence base building and publication of background papers that inform the key issues and questions posed in the Issues Paper document “Your Home, Your Future, Your Views”.

The SRA supports the direction of change signaled across the main themes of the Issues Paper, which will meet the objectives of the RSES and Cork MASP. Recommendations are provided to assist and strengthen the approach under themes raised and to strengthen alignment between the regional and local tier in the draft plan.

In providing our observations, the SRA have had due regard to Section 27A of the Planning and Development Act 2000 (as amended).

In addition, the SRA welcomes the emphasis, through separate Issues Paper headings which signal a positive direction of change and priorities under the next Development Plan to enhance place making and quality of life in the County and Region which will attract people, jobs and visitors.

As the pre-draft process advances and details emerge for the Core Strategy and the distribution of growth targets within this development plan cycle of 2022-2028, especially through Housing Need Demand Assessment, the SRA will have further recommendations at the appropriate stages.

Further engagement with the SRA as a key stakeholder and the Planning Policy Unit of Cork County Council in the development of the Draft Development Plan is encouraged. The RSES team are available for future consultation and clarities required regarding this submission and during the pre-draft preparation stages.

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David Kelly
Director Southern Regional Assembly

Appendix 1

Alignment of Key Themes in the Issues Paper with RSES Regional Policy Objectives (RPOs)

People and Places

- 1) Welcome reference to RSES objectives and targets in Sections 1.1.3, 2.5.1, 2.7.9 and Table 2.1, of Background Paper No 2.
- 2) In planning for infrastructure led growth, note the role of Key Towns (Mallow and Clonakilty) under RPO 11, RPO 19 and RPO 23.
- 3) The SRA note the benefits of 10-minute neighbourhoods are cited in Background Paper No 8 Transport and Mobility. This sustainable concept is positive for placemaking and is supported in RSES Section 3.9 Placemaking and specifically in Chapter 7, RPO 176 “10-minute City and Town Concepts”.
- 4) Infrastructure investment across the different tiers of settlements are addressed under:
 - RPOs 4 “Infrastructure Investment”;
 - RPO 7 “Delivery and Funding”;
 - RPO 8 “Investment to Deliver on the Vision for Metropolitan Areas”;
 - RPO 9 “Holistic Approach to Delivering Infrastructure”;
 - RPO 11 “Key Towns”; and
 - RPO 26 “Towns and Villages”.
- 5) See also Chapter 8 RPOs:
 - RPO 208 “Irish Water and Water Supply”;
 - RPO 209 “Strategic Water Supply Projects”;
 - RPO 211 “Irish Water and Waste Water”;
 - RPO 212 “Strategic Wastewater Treatment Facilities”; and
 - RPO 213 “Rural Wastewater Treatment Programmes”.
- 6) Support for a sustainable place framework for towns and villages, including New Homes in Small Towns and Villages and co-ordination with Irish Water and other stakeholders to deliver investment in water and wastewater treatment is supported under RSES Chapter 3, Section 3.6 Towns and Villages and RPO 26.

Settlements and Placemaking

- 1) Welcome reference to the RSES in Sections 2.1.9 to 2.1.16 of Background Paper No 4 including the importance of the region’s settlement hierarchy applied to Cork.
- 2) A key message of the RSES under RPO 2 “Planning for Diverse Areas” is that the overall strategy builds on cities and their associated metropolitan areas as engines of growth and seeks, in parallel, to re-position the Region’s strong network of towns, villages and diverse rural areas in an economically resilient, imaginative and smart way.
- 3) Opportunity for the Development Plan to support project partnerships and collaborations across settlements under Section 3.8 (RPO 28 “Collaboration/Partnership”, RPO 29 “Rural Settlement Networks” and RPO 30 “Inter-Urban Networks as Regional Drivers of Collaboration and Growth”).
- 4) Cork MASP Policy Objective 4 “Cork Metropolitan Area Regional Interactions” also supports the role for networks.
- 5) Cork MASP Policy Objective 1 (e) which is a specific support for the County Metropolitan Towns seeking high quality of life attributes, mixed use zonings and investment towards retrofitting quality infrastructure (physical, social, recreational) for existing communities in addition to infrastructure for future growth.
- 6) Cork MASP Section 7.3 -7.4 sets out high-level infrastructure priorities for strategic residential growth areas including Monard SDZ, Middleton, Cobh, Carigtwohill, Carrigaline, Passage West and other metropolitan settlements.
- 7) Tailored approaches to high density are supported under RSES Chapter 3 Section 3.9 Placemaking , which seeks higher densities taking account of the need for variability and flexibility of local circumstances and an evidence-based approach.
- 8) Welcome reference to the Cork Metropolitan Transport Strategy in Sections 2.1.30 to 2.1.32 of Background Paper 4. The importance of higher density land use and transport planning

integration is a key theme in RSES Chapter 6 which should be reflected in the settlement and placemaking strategy. In particular, the following RPOs address the themes and direction of change needed:

- RPO 151 Integration of Land Use and Transport;
 - RPO 152 Local Planning Objectives;
 - RPO 157 Local Transport Plans; and
 - RPO 165 Higher Densities.
- 9) Quality placemaking is at the core of RSES. Chapter 3 and Chapter 4 places a strong emphasis on quality placemaking principles to attract growth and regeneration of urban centres and enterprise growth (as identified it a key policy area also for the IDA to attract investment). Refer to RPO 31 Sustainable Place Framework and RSES Chapter 4, Section 4.7 Placemaking for Enterprise Development for guiding principles to assist initiatives.
- 10) In setting priorities for the metropolitan area, the following RSES objectives and content will assist:
- RPO 7 to RPO 9 seek investment and actions to deliver holistic physical and social infrastructure packages to facilitate infrastructure led growth in the metropolitan area. RPO 10 in addition supports a number of active land management measures to achieve compact growth and progress regeneration and development in the metropolitan area, which are applicable to metropolitan settlements.
 - Cork MASP Objective 1 seeks delivery of holistic infrastructure packages for the metropolitan towns, retrofitting physical and social infrastructure, regeneration, mixed uses and services to improve the quality of life across metropolitan towns for existing communities in addition to servicing future growth.
 - Cork MASP Section 5.0 sets out regional targets for the metropolitan area which can be addressed through the Core Strategy and additionally, Tables under Section 7.3 and 7.4 provide regional support for infrastructure priorities to enable regeneration and compact growth of metropolitan settlements.

In addition to improving services in the metropolitan towns, the SRA note Monard SDZ as an identified enabler under the NPF and RSES for the Cork MASP as a planned new rail based metropolitan town. Significant phased SDZ infrastructure packages are required, including rail station infrastructure, new road infrastructure, water and waste water supply.

Water and Wastewater Infrastructure

- 1) RSES Chapter 3, Section 3.6 Towns and Villages contains several regional policy positions for infrastructure led growth of smaller settlements and seeks co-ordination between local authorities and Irish Water and other stakeholders to deliver investment in the sustainable development of water and waste water treatment services for rural towns and villages.
- 2) RPO 26 “Towns and Villages” specifically seeks under part (f) co-ordination between Irish Water and other stakeholders to deliver water and waste water infrastructure. Part (g) of the objective supports New Homes in Small Towns and Villages initiatives and seeks collaboration with Irish Water and stakeholders for serviced sites initiatives.
- 3) Chapter 9 Implementation and RPO 227 “Investment and Funding” supports Local Authorities and communities in achieving the drawdown of investment funds. The potential for funding streams to address services infrastructure that are part of, and add additionality to, an overall regeneration strategy for smaller settlements. Types of activities supported under the NPF Rural Regeneration Development Fund include *“Measures to address infrastructural deficiencies in relation to services, access, or other infrastructure that may be needed to support town or village regeneration”*.
- 4) Infrastructure investment across the different tiers of settlements are addressed under:
 - RPOs 4 “Infrastructure Investment”;
 - RPO 7 “Delivery and Funding”;
 - RPO 8 “Investment to Deliver on the Vision for Metropolitan Areas”;

- RPO 9 “Holistic Approach to Delivering Infrastructure”;
 - RPO 11 “Key Towns”; and
 - RPO 26 “Towns and Villages”.
- 5) See also in Chapter 8:
- RPOs 208 “Irish Water and Water Supply”;
 - RPO 209 “Strategic Water Supply Projects”;
 - RPO 211 “Irish Water and Waste Water”;
 - RPO 212 “Strategic Wastewater Treatment Facilities”; and
 - RPO 213 “Rural Wastewater Treatment Programmes”.

Economy and Employment

- 1) Welcome the comprehensive cross references to both the settlement and economic components of the RSES in Section 2.2.12 to 2.2.32 of Background Paper 6.
- 2) Welcome the recommendation to align drivers for economic growth with principles of the RSES settlement strategy. For example, Table 5.1 Employment Hierarchy in the pre-draft consultation Background Paper 6 recommends:
 - Metropolitan Cork – Strategic Employment Areas of Carrigtwohill, Little Island, Ringaskiddy, Whitegate and other Metropolitan Towns including Midleton, Carrigaline, Cobh and Passage West.
 - Mallow and Clonakilty Key Towns
 - Networks such as
 - North Cork Agri Food Network
 - West Cork Marine Network
 - Cork Ring Network
- 3) Reflect interaction between the County’s economic drivers with wider regional economic drivers, enabled through enhanced regional connectivity. These include collaboration across the Region’s three metropolitan areas of Cork, Limerick-Shannon and Waterford and the Atlantic Economic Corridor which complement the economic roles of the County’s metropolitan area, Key Towns and Networks. Refer to RSES Chapter 3, RPO 6 “Collaboration Between Metropolitan Areas” and Chapter 4 Section 4.4 “Our Region’s Economic Engines”.
- 4) Reflect the strategic theme of enhanced connectivity to enable economic spread between regional engines, support for which is specifically addresses under RSES Chapter 6 RPO 166 “Investment in Strategic Inter Regional Multi-Modal Connectivity to Metropolitan Areas and Economic Corridors”.
- 5) Background Paper 6 reflects three out of five key principles that underline the RSES economic strategy (Smart Specialisation, Clustering and Placemaking for Enterprise Development). It is important the County’s economy policies also integrate the following principles as detailed in RSES Chapter 4, Section 4.2 Economic Strategy:
 - Knowledge Diffusion (RSES supports a Learning Region, developing our human capital through developing skills, talent, life-long learning and collaboration with higher education institutes, Regional Skills Forum and the Educational and Training Boards)
 - Capacity Building (capacity to bid for and win competitive bids for funding and capacity to respond to emerging challenges).
- 6) Strategic employment locations, which are drivers of economic growth for the Cork Metropolitan Area, are supported under Section 8 and Section 8.3 Distribution of Employment Growth of the Cork MASP. Infrastructure investment for Ringaskiddy, Marino Point, Little Island, Carrigtwohill, Whitegate-Ireland’s Energy Park and the Port of Cork is cited and supported. The role of Metropolitan Towns is supported in Cork MASP Section 7. In addition,

support for role of the Cork Metropolitan Area as an economic engine of growth is provided through:

- Cork MASP Policy Objective 10 “Enterprise Support, Education and Access to Talent”;
 - Cork MASP Policy Objective 11 “Transition to Digital Future”;
 - Cork MASP Policy Objective 12 “Infrastructure for Strategic Employment Locations”;
 - Cork MASP Policy Objective 13 “Port of Cork”.
- 7) The theme of rural innovation is strongly supported in the RSES. The RSES supports diversity, innovation and a network of viable rural towns and villages to ensure economic resilience and job creation. The Development Plan should reflect RSES Chapter 4 Section 4.5 Rural Development and RPOs 43-50 (addressing themes of the Common Agriculture Policy, Action Plan for Rural Development, digital infrastructure, rural partnership models, innovation hubs and diversification). RSES good practice examples of innovation in rural areas cite examples in County Cork including Teagasc Moorepark Research and Innovation Centre, Ludgate Hub in Skibbereen and the Council’s network of E Centres.
- 8) The theme of digital infrastructure, Smart Cities and a Smart Region are also strongly supported in Chapter 6 as follows:
- RPO 134 “Smart Cities and Smart Region”;
 - RPO 135 “High Quality High Capacity International Digital Transmission”;
 - RPO 136 “National Broadband Plan”;
 - RPO 137 “Mobile Infrastructure”;
 - RPO 138 “Digital Strategies”.
- 9) Tourism is addressed as a key sector and is supported under RSES Chapter 4, Section 4.6 Sector Development Opportunities, RPO 53 Tourism and Cork MASP Policy Objective 15 Cork MASP Tourism.
- 10) The Marine Economy and opportunities for the Region under the National Marine Planning Framework is also a key sector in RSES Chapter 4 with significant RPO support. Support to marine sectors will be addressed under this separate heading, as per the Issues Paper.
- 11) Support for the role of data centres is also reflected in the RSES. Refer to RSES Chapter 6 RPO 135 “High Quality High Capacity International Digital Transmission” and Chapter 8 Section 8.2 “Strategic Energy Grid” and RPO 221 “Renewable Energy Generation and Transmission Network”.

Transport and Mobility

Welcome the cross references to RSES Chapter 6 Connectivity, principles of the Regional Transport Strategy and the Cork Metropolitan Area Transport Strategy (CMATS) Section 2.2.12 to 2.2.32 , Section 3.4.7 and Section 5.2 of Background Paper 8.

- 1) Both the RSES and Cork MASP integrate transport priorities for the Cork Metropolitan Area, seek the distribution of population and employment growth aligned with transport infrastructure planning and support the implementation of infrastructure projects under CMATS. Reference that support the pre-draft consultation themes can be found as follows:
- RPO 164 “Metropolitan Area Transport Strategies”;
 - Cork MASP Policy Objective 7 “Integrated Landuse and Transport Planning”;
 - Cork MASP Policy Objective 8 “Key Transport Objectives (to be informed by and subject to the recommendations of) the Cork Metropolitan Area Transport Strategy”.
- 2) References to strategic connectivity between metropolitan areas, economic corridors, Key Towns, networks, ports and airports are supported by RSES , especially:
- RPO 166 “Investment in Strategic Inter Regional Multi-Modal Connectivity to Metropolitan Areas and Economic Corridors”;

- Cork MASP Policy Objective 4 “Cork Metropolitan Area Regional Interactions”.
- 3) Strengthened emphasis on the importance of the efficient movement of freight, maintaining and strengthening the TEN-T Network through the County and maintaining and strengthening the strategic rail network is recommended. Important references include:
 - RPO 140 “International Connectivity”;
 - RPO 141 “Regional Freight Strategy”;
 - RPO 146 “High Quality International Connectivity-Ports”; and
 - RPO 170 Rail
 - 4) Strengthened emphasis on metropolitan, cross county and inter county greenway connections (building on the Midelton to Youghal Greenway initiative) are encouraged and supported by :
 - RPO 174 “Walking and Cycling”;
 - RPO 200 “Green Infrastructure and Recreation”;
 - RPO 201 “National Trails, Walking Routes, Greenways and Blueway Corridors”; and
 - Cork MASP Policy Objective 17 “Metropolitan open Space , Recreation and Greenbelt Strategy”.
 - 5) Support for effective land use and transport planning integration, shift to sustainable modes and achievement of the Avoid-Shift-Improve policy approach is provided under RSES Section 6.3.6 Transport Investment Priorities. RPOs in support of the themes raised include:
 - RPO 151 “Integration of Land Use and Transport”;
 - RPO 152 “Local Planning Objectives”;
 - RPO 157 “Local Transport Plans”;
 - RPO 160 “Smart and Sustainable Mobility”;
 - RPO 161 “Smart Mobility”;
 - RPO 162 “Multi-Modal Travel Integration”; and
 - RPO 163 “Sustainable Mobility Targets”.
 - 6) Road based transport is often the only viable and sustainable mode for rural and peripheral locations. It is essential for “life lines” whereby smaller urban settlements and rural areas can access essential services, including health, education, retail, employment etc. and interchange with other public transport modes in key settlements through a safe and well-maintained road network. A high-quality road network is needed for successful rural public transport services, the movement of freight and emergency services. In larger urban areas, strategic road investment for orbital routes can facilitate a more efficient separation of economic and HGV movements, reduce congestion in the urban cores to improve the public realm, interchange facilities and active travel and allow new bus corridors to be established. Greater use of our road network for public transport, inter-regional bus services and local bus services, is an opportunity to encourage greater modal change. The County Development Plan should ensure investment in road infrastructure is also framed in economic, social, environmental and sustainable transport terms (bus networks). References in support of the strategic road network include:
 - RPOs 167 “National Road Projects”;
 - RPO 168 “Investment in Regional and Local Roads”;
 - RPO 171 “Bus”; and
 - Cork MASP Policy Objective 9 Strategic Road Network Improvements.
 - 7) Recommended references for the Development Plan also include RSES Chapter 6 RPOs 158 Intra-Regional Rural Connectivity, RPO 159 Role of Transport in Access for All, RPO 172 Rural Transport and RPO 173 Tourism Corridors (services along the key national tourism corridors).

Marine

- 1) The opportunities for the Southern Region under the National Marine Planning Framework (NMPPF) are significant, with Cork playing a significant role for our Region to be a first mover under Marine Spatial Planning (RPO 78).
- 2) The opportunities for our Marine Sector which support Cork's maritime assets can be referenced at:
 - RSES Chapter 4 Section 4.9 Marine and Coastal Assets and Section 4.9.2 Growing the Blue Economy;
 - RPO's 77-86, noting regional support for leadership across marine innovation, seafood sector, renewable off shore energy, marine clusters in ICT and biotechnology and support for our coastal and island communities (including Fishing Local Area Group-FLAG-development strategies);
 - Reference RPO 79 in particular which supports a Strategic Integrated Framework Plan initiative for Cork Harbour;
 - RSES Chapter 6, Section 6.3.4.2 Our Region's Strategic Port and Harbour Assets and RPOs 142-147 supporting infrastructure investment and the economic role of our port assets;
 - Cork MASP Section 2.3 Cork Harbour (a unique and strategic asset in the Cork Metropolitan Area);
 - Cork MASP Policy Objective 3 "Cork Harbour" which requires and supports a Strategic Integrated Framework Plan initiative ; and
 - Cork MASP Section 8.4 Role of Tier 1 Port of Cork and Specific Cork MASP Policy Objective 13 Port of Cork.

Climate Change

- 1) The RSES is committed to implement regional policy consistent with the Climate Action Plan 2019. Important RPO's in support of climate action and transition to a low carbon society and economy to reference include:
 - RPO 87 Low Carbon Energy Future;
 - RPO 88 National Mitigation Plan and National Adaptation Framework;
 - RPO 89 Building Resilience to Climate Change;
 - RPO 90 Regional Decarbonisation;
 - RPO 91 Decarbonisation in the Transport Sector;
 - RPO 94 Decarbonisation in the Agriculture Sector; and
 - RPOs 95-104 on Renewable Energy.
- 2) Supporting the initiatives of the Climate Action Regional Offices (CAROs) is strongly recommended. This will align with RSES support to the role of CAROs under RSES Chapter 5 RPO 88 which states it is an objective to ensure effective co-ordination of climate action with the Climate Action Regional Offices and local authorities to implement the Climate Action Plan, National Mitigation Plan and the National Adaptation Framework in the development and implementation of long-term solutions and extensive adaptation measures. This is a particular strength for Cork as the lead local authority on the Atlantic Seaboard South CARO.
- 3) The SRA recommend an emphasis on proposals for smart and innovative approaches to waste management and promotion of the Circular Economy (RPOs 107-108) and opportunities in Biomass (RPO 109).

Green Infrastructure

- 1) Strongly welcome and support the themes and direction of change signaled in the issues paper and in particular, welcome the reference to objectives of the RSES seeking greater integration of green infrastructure.
- 2) Recommend expanding the reference to Green and Blue Infrastructure (GBI) and also Nature-Based Solutions (NBS).
- 3) The GBI theme aligns with Local Authority commitments to Climate Action and will feature in mitigation, resilience and adaptation strategies. GBI and water conservation hits on both mitigation and adaptation.
- 4) References supporting the theme to note include:
 - RPO 110 “Ecosystems Services”
 - RPO 117 “Flood Risk Management and Biodiversity”
 - RPO 122 “ Sustainable Drainage Systems (SuDS)”
 - RPO 124 “Green Infrastructure”
 - RPO 125 “Green Infrastructure Corridors”
 - RPO 126 “Biodiversity”
 - Section 9.0 of the Cork MASP and Cork MASP Policy Objective 17 - Metropolitan Open Space, Recreation & Greenbelt Strategy

Biodiversity

- 1) The SRA welcome and support the emphasis on biodiversity, which is given prominence as a standalone theme, complementary to Green Infrastructure, Climate Action, Heritage and the Environment. This is a positive signal on the direction of change needed for a greater appreciation on the role of bio-diversity for our environment, society and economy.
- 2) Reference RSES Chapter 5 Section 2.0 Protecting, Conserving and Enhancing Our Natural Capital, which supports ecosystems services which focuses on the way that the natural environment works as a system and the valuation of the natural environment to determine policy interventions to deliver net benefits to society. Payment for Ecosystems Services (PES) approaches are supported which brings economic thinking and a market mechanism into the provision of natural resources. Beneficial examples of good practice in our Region, including the Burren Programme, Duhallow Life, Mulkear River Catchment Project, BRIDE Project and the River Allow Catchment Management Group are cited.
- 3) Reference RSES Chapter 5 good practices and RPOs in support of the River Basin Management Plans, Flood Risk Management and Biodiversity and support for initiatives by the Local Authority Waters Programme.
- 4) Reference the following specific RPOs which are supportive of Local Authority actions in implementing measures to identify, conserve and enhance the biodiversity of our Region:
 - RPO 126 Biodiversity
 - RPO 127 Invasive Species
 - RPO 128 All-Ireland Pollinator Plan
 - RPO 129 Landscape

Energy

- 1) Welcome the themes addressed and commitment to greater generation and integration of renewable energy into our transmission networks.
- 2) The RSES supports the Southern Region as a Carbon Neutral Energy Region. At a strategic level, the RSES supports international energy connectivity through projects such as the Eirgrid Celtic Interconnector.
- 3) Objectives in RSES Chapter 3 support smart technologies for energy efficiency in retrofitting initiatives (RPO 38 Retrofitting Initiative Priorities).
- 4) Objectives in RSES Chapter 4 support the low carbon economy and bio-economy and include RPO 57 “National Policy Statement on the Bio-Economy”, RPO 58 “Bio-Economy and Rural Areas” and RPO 56 “Low Carbon Economy”. The case study of Tipperary’s initiatives in low

carbon energy transition including its role as a European Model Demonstrator Region in the bio-economy are of benefit for example initiatives at a County level.

- 5) RSES Chapter 4, Section 4.9.2 "Growing the Blue Economy" includes support for off shore energy resources and RPO 85 "Renewable Offshore Energy".
- 6) Objectives in RSES Chapter 8 support new energy infrastructure, delivery of networks, transition to new renewable energy technologies, the Integrated Single Electricity Market, renewable energy sources for data centres, indigenous renewable gas production, micro renewable generation local/community energy projects. Such objectives connect with climate action, regional decarbonisation and renewable energy objectives under Chapter 5 Environment. Chapter 8 also references the Gas Networks Ireland renewable gas injection facility project with Green Generation Limited and the GRAZE Gas project in Mitchelstown.
- 7) References included in Chapter 5 Renewable Energy include:
 - RPO 95 "Sustainable Renewable Energy Generation"
 - RPO 96 "Integration of Renewable Energy Sources"
 - RPO 97 "Power Stations and Renewable Energy"
 - RPO 98 "Regional Renewable Energy Strategy"
 - RPO 99 "Renewable Wind Energy"
 - RPO 100 "Indigenous Renewable Energy Production and Grid Injection"
 - RPO 101 "International Hub for Energy Innovation"
 - RPO 102 "Energy Research Funding"
 - RPO 103 "Interconnection Infrastructure"
 - RPO 104 "Energy Storage and Carbon Capture"
 - RPO 105 "Clean Electric Heat Technologies & District Heating"
 - RPO 106 "Future Proofing and Retrofitting"

Community

- 1) Welcome the themes addressed and commitment to delivering social infrastructure and high-quality services for our existing and changing population profiles.
- 2) Retrofitting high quality infrastructure and services to communities who experienced past high rates of growth, but without corresponding physical and social infrastructure to a high standard, is a priority, especially in the Cork Metropolitan Area. It is a key issue identified in both the NPF and Cork MASP. Chapter 7 RPO 175 "Improving Regional Quality of Life Through Infrastructure Led Planning" seeks to tackle such legacies. Cork MASP Policy Objective 1 (e) specifically seeks support for communities in Metropolitan Towns through regeneration initiatives, investment to support retrofitting holistic infrastructures (physical, social, recreational, public transport, active travel networks including enhanced filtered mobility for pedestrians and cyclists inter alia) for vibrant metropolitan communities. Mixed use planning and infrastructure led growth is required for the future growth and regeneration of these settlements.
- 3) Refer to RSES Chapter 7 Quality of Life which addresses many issues raised for supporting our communities and for reference:
 - RPO 176 "10-Minute City and Town Concepts";
 - RPO 177 "Childcare, Education and Health Services";
 - RPO 178 "Universal Health Services";
 - RPO 179 "Diverse and Socially Inclusive Society";
 - RPO 180 "Volunteering and Active Citizenship";
 - RPI 181 "Equal Access";
 - RPO 182 "Ageing Population"; and
 - RPO 183 Digital Strategies.
- 4) The RSES places a strong emphasis on education, skills development and life-long learning, with recognition of a Learning Region status. RPOs for reference include:
 - RPO 184 (support for higher education institutes and the new Munster Technological University);
 - RPO 185 "New School Facilities";
 - RPO 186 "Life Long Learning"

- RPO 187 “Education and Training”
 - RPO 188 “Regional Skills Forum”
 - RPO 189 Further Education and Training
 - RPO 190 Lifelong Learning and Healthy City Initiatives
- 5) Support for culture and arts in our communities is central to our quality of life. The development plan should integrate strong support to the culture and creative sectors (RSES Chapter 7 Section 7.2.2 and RPOs 191-194).
 - 6) Support for our Gaeltacht communities, both for their culture, service towns, linguistic heritage and economic vitality, should have strong policy support (RSES Chapter 7 Section 7.2.4 and RPOs 195-197).
 - 7) Support for parks, sports and recreation are essential for quality place making and our well-being and need strong policy support (RSES Chapter 7 Section 7.2.6 and RPOs 198-201).
 - 8) Refer to Cork MASP Policy Objective 21 “Healthy Cities, Healthy Environment and Health Infrastructure” and Cork MASP Policy Objective 22 “Social Inclusion” for health and social inclusion priorities in the metropolitan area, which includes support to actions under the Cork County LECP.
 - 9) Reference RSES Section 7.1.1 Inclusive Communities and Places for further support on building resilient , sustainable communities and initiatives including implementation of LECP actions.

Heritage

- 1) The SRA welcome the theme and support the direction signaled where protection and enhancement of our built and natural heritage is important for our place making qualities and quality of life, essential to retain and attract population, enterprise investment and tourist visitors.
- 2) The SRA support initiatives by the Heritage Council including Collaborative Town Centre Health Checks which have a positive role in assisting town and village renewal initiatives.
- 3) Refer to RSES Chapter 3 Section 3.9 Placemaking, Section 3.11 Regeneration and RPO 34 “Regeneration , Brownfield and Infill Development” which includes support for regenerating and repurposing existing building stock in both urban and rural settings. RPO 26 “Towns and Villages” and RPO 38 “Retrofitting Initiative Priorities” also supports retrofitting infrastructure for energy conservation and re-use of our built assets to help achieve compact growth. Such initiatives should be balanced with heritage protection.
- 4) Refer to RSES Chapter 7 and the following RPOs to protect and maintain our environmental and built heritage:
 - RPO 202 “Natural Heritage, Bio-Diversity and Built Heritage Assets”
 - RPO 203 “Revitalisation of Historic Cores”
 - RPO 204 “Better Public Access”
 - RPO 205 “Built Heritage”
 - RPO 206 “Architectural Heritage”
 - RPO 207 “Archaeological Investigation”.