

Tionól Réigiúnach an Deiscirt

Teach an Tionóil,
Sráid Uí Chonaill,
Pórt Láirge,
Éire.
X91 K256



Southern Regional Assembly

Assembly House,
O'Connell Street,
Waterford,
Ireland.
X91 K256

Teil/Tel: +353 (0)51 860700 Facs/Fax: +353 (0)51 879887
R-phost/Email: info@southernassembly.ie Idirlíon/Web: www.southernassembly.ie

Senior Planner,
Planning Policy Unit,
Cork County Council,
County Hall,
Carrigrohane Road,
T12 R2 NC.

Date: 15th February 2022

RE: Proposed Amendments to the Draft Cork County Development Plan 2022-2028

SRA File Ref: 21/003

A Chara,

I refer to your notice of the publication of Proposed Amendments to the Draft Cork County Development Plan 2022-2028. The Southern Regional Assembly (SRA) welcome this opportunity to comment on the Proposed Amendments.

The SRA commend the continued work undertaken in the preparation of this Draft Plan and these amendments to strengthen policies and objectives. These observations are focused solely on the published material amendments and are intended to assist the Council in achieving successful alignment of the Development Plan with the Regional Policy Objectives (RPOs) of the Regional Spatial and Economic Strategy (RSES), Cork Metropolitan Area Strategic Plan (MASP) and National Policy Objectives.

Ch 1 Introduction

Proposed Amendment 1.1.1 integrates reference to the Climate Action and Low Carbon Development (Amendment Act) 2021, which is welcomed and aligned with RSES RPOS 87-90 for climate action and transition to a low carbon economy.

Proposed Amendment 1.1.2 strengthens the plan's commitment to enhance and protect biodiversity and supports the development of community led Biodiversity Action Plans and Pollinator Plans. These amendments are welcomed and align with RSES RPOs 126 Biodiversity and 128 All Ireland Pollinator Plan.

Chapter 2 Core Strategy

Proposed Amendment 1.2.3 addresses Recommendation No 1 of the SRAs submission to the Draft Plan which advised clarity on Core Strategy population projections to demonstrate that the approach followed is consistent with RSES RPO 3 and the Guiding Principles under Section 3.3 "A Tailored Approach".

It is noted the amendment clarifies each stage of the Core Strategy projection, assigning the RSES Local Authority target to the plan period (Stage 1), application of additional population headroom (11,250 people to 2026) , which is allocated over the four Strategic Planning Areas of the County (Stage 2). The plan covers the period Q3 2022 to Q 2 2028, thereby incorporating 1.5 years of the 2026- 2031 RSES population growth (population target of 391,185 persons by Q2 2028). These projections are stated as directly informed by the provisions of the NPF and RSES.

The SRA note that the population projected growth 2016 to the end of the plan period Q 2 2028) is 59,170 growth. The clarifications are an adjustment from a growth of 60,913 over that period under the Draft Plan (a downward revision of 1,743 population).

Proposed Amendment 1.2.9 addresses the Core Strategy, clarifying the allocation of the population target across the four strategic planning areas of County Metropolitan Cork Strategic Planning Area /County Cork MASP and the remainder of County Cork (Greater Cork Ring, North Cork and West Cork). This amendment outlines the basis for calculations using Cork MASP and RSES uplift to 2026 with the growth to Q2 2028 interpolated from the 2026-2031 Tranche as set out in the NPF and RSES. The methodology allowed for the disaggregation of the overall Strategic Planning Area level or sub County targets to achieve the strategic outcomes, policy direction and guidance from the NPF and the RSES to filter down to the settlement framework for Cork County, including an acknowledgement of NPO 9 and the importance of the County Cork MASP area and the Key Towns of Clonakilty and Mallow in performing at a rate of 30% or higher on their 2016 population.

Further clarifications on the Housing Supply Target (HST) Methodology are provided which identify an overall requirement for the plan period of 22,611 units (inclusive of household units projected from the 25% population allocation to 2026).

The SRA note that the new units for the plan period under the Draft Plan HST Methodology was 29,352 units. The clarifications in the amendments have allowed for a downward adjustment of 6,741 units.

Proposed Amendment 1.2.13 sets out additional text for the Core Strategy Statement, key principles noted by the SRA include:

- A significant portion of County Cork's proposed growth will be in the County Cork Metropolitan Area and the two Key Towns of Mallow and Clonakilty.
- The objective for other County Towns, Key Villages and smaller settlements is to ensure that these settlements grow at an appropriate rate where both physical and social infrastructure keeps pace with population growth.
- The allocation of growth targets, seeks to ensure that the growth would be sustainable and in keeping with the scale of the settlements, ensure the capacity to accommodate the additional growth without damage to the settlement's character and the carrying capacity of their environment.

- The population growth rates are stated as not proposed in excess of 30% of the 2016 population in general terms. Where growth marginally exceeds this rate, it is based on capacity in terms of planned water services infrastructure, units under construction and extant permissions.
- Growth targets also account for spare capacity and/or the imminent construction of additional water infrastructure which failed to materialise over the course of the previous plan period.

Proposed Amendments 1.2.11 and 1.2.12 provide text to frame the policy approach to the additional provision of serviced zoned lands and residential reserve.

Stated Principles of applying additional provision include:

- Additional Provision (as identified in Development Plan Guidelines for Planning Authorities (Draft)) for zoned serviced lands in addition to projected housing demand requirements is supported by the Core Strategy for most Main Towns and Key Villages (>1,500 population). It is stated by the Council that Additional Provision will accord with the criteria of the Development Plan Guidelines (the extent must be comprehensively identified, quantified and explained in the core strategy and shall not exceed 20-25% of the required quantum of zoned land and sites in settlements for the plan period).
- The extent of Additional Provision Land and equivalent unit supply is outlined in the overall Core Strategy with further details in the settlement volumes.
- The Council support additional provision to ensure an adequate supply of housing given the housing market where supply of new houses is trailing behind demand and to recognise the Irish Water Investment Programme over the lifetime of the plan which will address legacy issues of lack of services to increase supply.
- Urban Development Zones (identified in Housing for All) and Long Term Strategic and Sustainable Development Sites (identified in the Development Plan Guidelines for Local Authorities (Draft)) align with the aims of Cork County Council's Urban Expansion Areas (UAEs). The extended timescale needed to deliver infrastructure on such strategic sites will require certainty in terms of zoning status to ensure long-term planning, investment and incremental progress in service delivery over several Development Plan cycles. These UAEs and Monard SDZ are therefore included in the plan, in the Core Strategy where some delivery is expected by the end of the plan period and as a roadmap for the subsequent Development Plan to progress long term delivery.

Principles of the Residential Reserve include:

- Provided for Metropolitan Towns, Key Towns and some County Towns to accommodate residential development in the longer term (forward plan service provision for the delivery of units under the subsequent Development Plan).
- Located for settlements where accelerated growth has historically taken place and is anticipated in the future.
- Enables the long-term strategic vision for the sustainable development of these lands and the delivery of enabling infrastructure, can be realised.
- These lands need to be identified as part of the longer-term residential land supply to bring some certainty to the development process.

Proposed Amendment 1.2.20 gives additional clarity on the tiered approach applied to zoning land under National Policy Objective 72 a. A new table is provided setting out an

assessment of residentially zoned lands and associated infrastructure needs, in accordance with the requirements of Appendix 3 of the National Planning Framework. The SRA note:

- The assessment cannot be exhaustive but importantly it demonstrates how lands zoned in the County Development Plan identified for residential development, are either sufficiently serviced (Tier 1) or have potential to become fully serviced within the timeframe of the Plan (Tier 2).
- The full extent of requisite enabling infrastructure will continue to be assessed through the development management process.
- It is noted the current capital investment plan of Irish Water covers the period from 2020 to 2024, shorter than the timeframe of the County Development Plan. The council will continue to work collaboratively with all infrastructure providers and stakeholders to deliver infrastructure.

Observation on Chapter 2 Core Strategy Proposed Amendments

Regarding the amendments as summarised above, the SRA welcome the clarities provided which, for the purposes of RSES population targets and the principles of growth allocation, demonstrate alignment with the RSES RPO 3, Sections 3.2 and 3.3 and Appendix 1 Transitional Local Authority Population Projections to 2031. In addition, the measures support delivery of compact growth and infrastructure led development for the Cork Metropolitan Area, Key Towns and Other Towns and Villages aligned with RPOs 10 Compact Growth in Metropolitan Areas, RPO 11 Key Towns, RPO 26 Towns and Villages and importantly RPO 37 Active Land Management.

Regarding Additional Provision and Long Term Strategic and Sustainable Development Sites , the SRA note the criteria as required under Sections 4.4.3 and 4.4.4 of the Draft Development Plan Guidelines for Planning Authorities need to be applied to such sites and that on a settlement basis, such proposals for additional provision will be assessed and evaluated by the Office of the Planning Regulator in accordance with the Development Plan Guidelines for Planning Authorities.

Proposed Amendment 1.2.6 regarding Compact Growth addresses Recommendation No 2 of the SRA's submission to the Draft Plan regarding indicators for achieving compact growth targets. The SRA note and welcome the assertion that the Core Strategy aim to deliver at least 30% of the overall net housing requirement in or contiguous to the town centre or core and to identify key locations and opportunity sites which include sites close to town centres which are greenfield and zoned for residential development. The extent of zonings on peripheral greenfield development sites are being critically evaluated to their compatibility with compact growth targets and are identified in the settlement volumes of the plan. The plan requires projected population growth to be planned in accordance with NPF National Policy Objectives 3a, b and c, which target infill and brownfield development within the existing built footprint of settlements. The amendment confirms alignment with RSES RPO 34 Regeneration, Brownfield and Infill Development and RPO 35 Support for Compact Growth.

Chapter 3 Settlements and Placemaking

Proposed Amendment 1.3.4 is welcomed where it makes additional provision and support through Objective PL 3-1 for public realm and outdoor space improvements across settlements, delivery supported by Fáilte Ireland's new Outdoor Dining Enhancement Investment Scheme.

Proposed Amendment 1.3.7 further provides further support for placemaking, linked with cultural quarters and support for the arts delivered within regeneration projects and plans.

This strengthening is welcomed and aligned with RSES RPO 11, RPO 26 and RPO 31.

Proposed Amendment 1.3.9 gives strengthened report to retrofitting infrastructure and environmental amenities to address deficits across the settlement network. At a site level, the role of the existing building stock, brownfield lands and infill sites are an integral part of delivering sustainable growth within the built envelope of our towns and villages. Opportunities for the upgrading and future proofing of the building stock to cater for smart technologies and energy efficiency is also supported.

Proposed Amendment 1.3.10 further supports the re-use and revitalisation of brownfield sites, heritage buildings and reuse of vacant buildings in urban and rural areas.

The amendments align with RSES RPOs 34 Regeneration, Brownfield and Infill Development, RPO 38 Retrofitting Initiative Priorities and RPO 106 Future Proofing and Retrofitting.

Proposed Amendment 1.3.11 regarding serviced site initiatives addresses Recommendation 6 of the SRA's submission to the Draft Plan. The amendment states the Council will seek support and investment for the sustainable development of a new homes in small towns and villages initiative working in partnership with Irish Water, local communities and other stakeholders to create "build your own home" opportunities within the existing footprint of smaller towns, key villages and villages. This amendment is welcomed and aligns with RSES RPO 26 Towns and Villages, RPO 34 Regeneration, Brownfield and Infill Development and RPO 35 Support for Compact Growth.

Proposed Amendment 1.3.15 regarding placemaking for Enterprise Development addresses Recommendation 9 of the SRA's submission to the Draft Plan. It recognises the need for placemaking qualities and permeability in the layout and design of enterprise development and use of tools such as Health Place Audits for Placemaking to guide enterprise zone, site and project design. This amendment is welcomed and aligns with RSES RPO 31 Sustainable Place Framework, Section 4.7 and RPO 61 Health Place Audit for Placemaking.

The SRA also note the positive new section in the Draft Plan for Quality Design (**Proposed Amendment 1.3.12**) and higher quality in design responses by design teams for projects in towns and villages. This provision aligns with RSES RPOs 11 Key Towns, RPO 26 Towns and Villages, Section 3.9 Placemaking, RPO 31 Sustainable Place Framework and RPO 35 Support for Compact Growth.

Chapter 4 Housing

Proposed Amendments 1.4.1, 1.4.2 and 1.4.10 support the delivery of Government's Housing for All (2021) Plan, delivery under Housing Need Demand Assessment (HNDA) and serviced sites initiatives. These provisions are welcomed, also respond to Recommendation 6 of the SRA's submission to the Draft Plan and align with RSES RPOs 10 Compact Growth in Metropolitan Areas, RPO 11 Key Towns, RPO 26 Towns and Villages, RPO 32 Rebuilding Ireland, RPO 33 HNDA, RRO 36 Land Development Agency and RPO 37 Active Land Management.

Chapter 5 Rural

The SRA note and welcome **Proposed Amendment 1.5.7** which integrates delivery of national policy under Our Rural Future for vibrant and lived-in rural places, integral to the policies of the plan for rural Cork including support for a strong network of towns and villages and support for digital connectivity for resilient rural communities. This positive amendment aligns with RSES RPO 26 Towns and Villages, RPO 27 Rural and economic objectives RPOs 43-50 for digital infrastructure and services and support for economic diversification and resilience in the rural economy of the Region.

Chapter 6 Social and Community

The SRA note and welcome **Proposed Amendments 1.6.5 to 1.6.9** in support of education and school infrastructure provision including the accessible location and design of schools provided in a carbon neutral model. These amendments align with RSES RPO 185 New School Facilities.

Further, **Proposed Amendments 1.6.11 and 1.6.13** support age friendly policies and provision of housing, life long-living accommodation and services for active older communities at the heart of towns, villages and rural communities. A new objective SC 6-12 Age Friendly is provided. These positive amendments align with RSES RPO 179 Diverse and Socially Inclusive Society, RPO 181 Equal Access and RPO 182 Ageing Population.

Chapter 7 Marine Coastal and Islands

The SRA note and welcome **Proposed Amendments 1.7.8 to 1.7.10** which support delivery of national policy under the National Marine Planning Framework and delivery of new requirements and planning system for the marine (consenting, enforcement and forward planning) under the Maritime Area Planning Bill. These provisions strengthen commitment under the Development Plan for Cork to be a first mover in the Marine Economy. These provisions align with RSES RPOs 76-86 for Marine Spatial Planning and growing the Blue Economy and also Cork MASP Objective 3 which seeks a planning framework initiative for Cork Harbour to guide the sustainable future management of different uses in the harbour area while protecting the sensitive ecosystems and designated sites.

Chapter 8 Economic Development

The SRA note and welcome **Proposed Amendment 1.8.3** regarding strengthened support to Ringaskiddy as a strategic location of the Port of Cork, specialised industries, employment, research and development and residential communities. The section identifies the importance of key projects which support these roles, including upgrade of the N28 to the M28, public transport, active travel, enhanced connectivity along the Ringaskiddy, Carrigaline and Passage West/Glenbrook/Monkstown access and services for strategic enterprise lands.

These supports align with the RSES and support for Ringaskiddy as a Strategic Employment Location under Cork MASP Objective 9 Strategic Road Network Improvements, Objective 12 Infrastructure for Strategic Employment Locations, Section 8.3 Distribution of Employment Growth and Table 2 Strategic Employment Locations and Objective 13 Port of Cork.

Proposed Amendment 1.8.6 regarding economic resilience through education and training responds to Recommendation 7 of the SRA's submission to the Draft Plan seeking targeted support for skills, further education and life-long learning. The amendment strengthens Objective EC 8-4 Economic Resilience in supporting the development of workforce skills,

further education and training facilities and life-long learning initiatives throughout the County. This aligns with RSES RPOs 63 and RPOs 186-190 for skills, talent and further education and training.

Proposed Amendment 1.8.7 regarding transport connectivity for economic growth responds to Recommendation 8 of the SRA's submission to the Draft Plan, seeking better connectivity as an enabler for economic interactions between the County's and Region's drivers of economic growth. The amendment supports digital and transport connectivity for interaction between the County's Employment Network and the Region's Economic Drivers including Cities and Metropolitan Areas, Economic Corridors and other Key Towns and Networks, especially those with close cross boundary interactions. Objective EC- 8-4 Connectivity prioritises infrastructure delivery across the County to enhance connectivity (multi-modal transport and digital). This amendment is positive and aligns with RSES RPOs 68 Regional Investment, RPO 166 Investment in Strategic Inter-Regional Multi Modal Connectivity and Cork MASP Objective 4 Metropolitan Cork Area Regional Interactions.

Proposed Amendment 1.8.8 gives further support to placemaking for enterprise development (in the layout and design of enterprise development across the settlement network of County Cork), a complement to Proposed Amendment 1.3.15 regarding placemaking for Enterprise Development, both of which positively address Recommendation 9 of the SRA's submission to the Draft Plan and align with RSES RPO31 Sustainable Place Framework, Section 4.7 and RPO 61 Health Place Audit for Placemaking.

Other positive strengthening in this chapter noted and supported by the SRA include:

- **Proposed Amendment 1.8.11** supporting Renewable Energy projects which aligns with RSES RPO 56 Low Carbon Economy, RPO 87 Low Carbon Energy Future and RPOs 95-104 Renewable Energy generation.
- **Proposed Amendment 1.8.17** supporting new Objective EC8-16 for employment development aligned with the employment network of the County. This new objective is aligned with RSES Section 4.4 Our Region's Economic Engines and reinforces the synergy between the spatial and economic policies of the Development Plan, just as the Region's spatial hierarchy and drivers for economic growth are aligned. This provision also supports RSES RPO 2 Planning for Diverse Areas.
- **Proposed Amendment 1.8.18** provides strengthened support for business development in rural areas and is aligned with RSES support to a diverse and resilient rural economy including RPOs 43-50 for digital infrastructure and services, economic diversification and resilience in the rural economy.

Chapter 9 Town Centres and Retail

Th SRA note **Proposed Amendments 1.9.5 , 1.9.15 and 1.9.21** in support of vibrant after hours economy, Town Centre Health Checks, addressing the challenges of a changing retail sector (on-line retailing) and enhancing the customer experience and quality of the public realm to attract people to town centre retailing. These amendments align with RSES RPO 55 Retail.

The SRA also note and welcome **Proposed Amendment 1.9.16** which commits to a Joint Retail Strategy for Metropolitan Cork, to be prepared by Cork City Council and Cork County Council within 12 months of the adoption of the City and County Development Plans. The SRA note that once finalised, the Joint Retail Strategy will inform a variation to Cork County

Development Plan. The preparation of a Joint Retail Strategy for the Cork Metropolitan Area in accordance with the Retail Planning Guidelines aligns with RSES RPO 55 Retail and Cork MASP Objective 16 Retail.

Chapter 10 Tourism

Proposed Amendment 1.10.18 gives support to Blueway network in addition to Bridleways (equestrian trails), which can be expanded to be used by hikers and cyclists. Such initiatives are supported by RSES RPO 53 Tourism, RPO 200 Green Infrastructure and Recreation and RPO 201 National Trails, Walking Routes, Greenways and Blueway Corridors.

Chapter 11 Water Management

Proposed Amendment 1.11.1 is informed by the completion of the flood risk assessment of the Draft Plan and the integration of new objectives to reflect the recommendations of that assessment. This inclusion is supported and aligns with RSES RPOs 113-119 for flood risk management objectives.

Proposed Amendment 1.11.7 supports water sensitive urban design and promotes nature-based solutions to surface water management as an effective means of adapting to climate change and creating climate resilient communities. The policy supports project designs that consider surface water from the inception stage and to link such designs with Green Infrastructure. This amendment is positive and aligns with RSES RPO 112 Sustainable Drainage Systems, RPO 124 Green Infrastructure and RPO 126 Biodiversity.

Chapter 12 Transport and Mobility

Proposed Amendments 1.12.54 and 1.12.55 regarding smart mobility, multi-modal travel and Mobility as a Service addresses Recommendation 10 of the SRA's submission to the Draft Plan. The addition of a new Objective to support innovation in sustainable mobility is welcomed and aligns with RSES RPO 161 Smart Mobility and RPO 162 Multi-Modal Travel Integration.

The SRA also note and welcome the following amendments which strengthen the Council's policies for sustainable mobility and delivery of transport infrastructure:

- **Proposed Amendment 1.12.1** references the N/M20 Cork to Limerick route as a major national transport infrastructure project for enhanced regional connectivity. This is supported by the SRA and aligns with RSES RPO 166 Investment in Strategic Inter-Regional Multi-Modal Connectivity to Metropolitan Areas and Economic Corridors, RPO 167 National Road Projects, Cork MASP Policy Objective 4 Cork Metropolitan Area Regional Interactions and Cork MASP Policy Objective 9 Strategic Road Network Improvements.
- **Proposed Amendments 1.12.14 to 1.12.18 and 1.12.34** regarding preparation of Local Transport Plans (LTPs), guidance for LTP preparation including the use of Area Based Transport Assessment (ABTA) Methodology and delivery of the 10 Minute Town concept and its benefits (economic, health, climate action and social) which align to RSES RPO 157 Local Transport Plans and RPO 176 10 Minute Cities and Towns.
- Regarding Proposed Amendment 1.12.14 specifically referring to thresholds for Local Transport Plans (LTPs), it would be helpful to qualify the intent to prepare LTPs for the Key Towns of Mallow and Clonakilty and other towns as the population indicated (at or approaching 10,000) may preclude settlements less than that scale that play an

important service and employment role to wide hinterlands that would benefit from a LTP.

- **Proposed Amendments 1.12.19 and 1.12.26** which support rural transport services, integration of Local Link with other transport services and delivery of the NTAs Connecting Ireland plan and developing Demand Responsive Transport Services are positive additions in support of RSES RPO 158 Intra Regional Rural Connectivity, RPO 160 Smart and Sustainable Mobility, RPO 162 Multi-Modal Travel Integration, RPO 172 Rural Transport RPO 175 Improving Regional Quality of Life through Infrastructure, RPO 176 10 Minute Cities and Towns and RPO 182 Ageing Population.
- **Proposed Amendment 1.25** provides a new Objective TM12-2 for Active Travel and Equal Access, seeking universal design in the built environment to facilitate greater use of public transport, walking and cycling. This objective is a positive addition and aligns with RSES RPO 159 Role of Transport in Enabling Access for All and RPO 181 Equal Access.
- **Proposed Amendment 1.12.50** supporting the Safe Route to School Programme and Greener Schools, aimed at increasing public and active travel to schools positively supports RSES RPO 160 Smart and Sustainable Mobility, RPO 174 Walking and Cycling and RPO 185 New School Facilities.
- **Proposed Amendment 1.12.52** inserts a new Objective TM 12-3 to protect disused railway infrastructure for future potential re-use and allow active travel infrastructure which retains the option of using rail lines at a future point. This aligns with RSES RPO 170 Rail and RPO 201 Natural Trails, Walking Routes, Greenway and Blueway Corridors.
- **Proposed Amendment 1.12.61** also supports rail with new Objective TM 12.3 to support the provision of rail infrastructure, including depot facilities, to deliver Cork Metropolitan Transport Strategy (CMATS) objectives for rail service provision. This new objective aligns with RSES RPO 170 Rail and Cork MASP Policy Objective 8 Key Transport Objectives informed by CMATS.
- **Proposed Amendment 1.12.39** provides additional text in support of the role of Cork Airport as a key tourism and business gateway to Cork and the wider Southern Region. This amendment is aligned with Cork MASP Policy Objective 14 Cork Airport.

Chapter 13 Energy and Communications

Proposed Amendments 1.13.8 and 1.13.22 respond to Recommendation 12 of the SRA's submission to the Draft Plan seeking an objective in support of Smart Cork initiatives. The additions address a commitment to achieving Smart Region and digital technology initiatives as an enabler for a higher quality of life and strong economy in urban and rural areas. Objectives are strengthened with new text supporting Smart Cities and a Smart Region and roll out of digital infrastructure and smart technology to urban and rural areas. This amendment is welcomed and aligns with RSES RPO 134 Smart Cities and a Smart Region.

Proposed Amendment 1.13.1 commits the Council to preparing a Renewable Energy Strategy for the County during the life of the plan. This is supported by the SRA and aligns with RPOs 95-104 for Renewable Energy, RPO 87 Low Carbon Energy Future and RPO 90 Regional Decarbonisation.

The SRA also note and welcome:

- **Proposed Amendment 1.13.9** which updates targets for Off-Shore Renewable Energy in line with the Climate Action Plan 2021. This amendment aligns with RSES RPOs 87, 90 and 95-106 as outlined above.
- **Proposed Amendment 1.13.20** in support of Micro Renewable Energy generation which aligns with RSES RPO 221 Renewable Energy Generation and Transmission Network.
- **Proposed Amendment 1.13.32** in support of hydrogen as a clean energy source which aligns with RSES RPO 91 Decarbonisation in the Transport Sector.

Chapter 14 Green Infrastructure and Recreation

Proposed Amendment 1.14.3 strengthens support to Nature Based Solutions in the plan for climate change mitigation and adaptation and for societal and economic benefits. This amendment is welcomed and aligns with RSES RPO 110 Ecosystem Services, RPO 124 Green Infrastructure and RPO 125 Green Infrastructure Corridors.

Proposed Amendment 1.14.9 strengthens support for enhancing Biodiversity and Ecosystems as a fundamental part of Green Infrastructure, support a network of bio-diversity corridors and implementation of the County Biodiversity Strategy.

Proposed Amendment 1.4.21 addresses Recommendation No 11 of the SRA's submission to the Draft Plan seeking support for the preparation of the Metropolitan Cork Open Space, Recreation and Greenbelt Strategy. New text added to Objective GI 14-4 affirms the Council's support to work with the various stakeholders in the preparation of this metropolitan level strategy. This amendment is welcomed and aligns with Cork MASP Policy Objective 17.

Chapter 15 Biodiversity and the Environment

Proposed Amendments 1.15.1, 1.15.8 and 1.15.10 support the Council's Biodiversity Action Plan (to be reviewed within 12 months of the adoption of the Development Plan), strengthen Objective BE 15-6 to achieve a net gain in biodiversity and support use of the Council's guidance document Biodiversity and the Planning Process. These amendments are supported and align with RSES RPO 126 Biodiversity.

Proposed Amendment 1.15.14 strengthens policy support for managing light pollution in dark sky reserves in the County which is supported by RSES RPO 132 Dark Sky Parks and Reserves.

Chapter 16 Built and Cultural Heritage

Proposed Amendments 1.16.4, 1.16.6 and 1.16.15 are supported, addressing appropriate access to archaeological monuments, management of monument sites and protection of Medieval heritage. These amendments align with RSES RPOs 204 Better Public Access for our heritage sites, RPO 205 Built Heritage, RPO 206 Architectural Heritage and RPO 207 Archaeological Investigation.

Proposed Amendments 1.16.27 to 1.16.30 strengthen Development Plan support for Irish Language, the heritage of the Múscraí Gaeltacht, implementation of the Council's Múscraí Heritage Plan 2019-2033 and through Objective HE10-22 promotion of the Irish Language as a community language. These amendments are welcomed and supported by RSES RPOs 195 Language Plans and 196 Gaeltacht.

Proposed Amendment 1.16.31 strengthens Objective HE 16-23 for the arts by seeking implementation of the Arts Plans and Culture and Creativity Strategy (and subsequent plans) in collaboration with the County Arts Office. These amendments are supported and align with RSES RPOs 191 Cultural and Creativity Sectors, RPO 192 Cultural Policies and Objectives and RPO 194 Arts, Heritage and Culture.

Chapter 17 Climate Action

Proposed Amendment 1.17.2 updates text to refer to the Climate Action Plan 2021, targets to achieve net zero greenhouse gas emissions and implementing decarbonising zones in each local authority' as one of the targets to meet the required level of emissions reductions by 2030. These amendments are welcomed and align with RSES RPOS 87-90 for climate action and transition to a low carbon economy.

Ch 18 Zoning and Land Use

The SRA note **Proposed Amendments 1.18.1, 1.18.2, 1.18.4 and 1.18.5** referring to use of residential reserve zonings in some County Towns in addition to the Key Towns, provisions for additional provision zoning, long term strategic and sustainable development sites and residential reserve. These amendments align with amendments under Ch 2 Core Strategy the criteria for applying additional provision under the Development Plan Guidelines for Planning Authorities (Draft).

The SRA's comments to Chapter 2 Core Strategy amendments, that the principles of applying these provisions (and the sustainable criteria that needs to be satisfied) have been set out to ensure compact growth and phased and infrastructure led housing delivery occurs across settlements under Core Strategy apply here.

Proposed Amendment 1.18.14 refers to Green Infrastructure zoning to include provision for Blue Infrastructure to assist flood management and is aligned to RSES RPO 124 Green Infrastructure and RPOs 113-119 for flood risk management and planning.

Chapter 19 Implementation and Delivery

Proposed Amendment 1.19.3 for infrastructure costs and funding strengthens implementation identifying critical infrastructure needs to unlock residential development. Work on infrastructure costings will be ongoing during implementation. This aligns with RSES RPOs 7-9 for delivery and funding in metropolitan areas and RPO 227 Investment and Funding.

Proposed Amendment 1.19.5 supports Local Transport Plans (LTPs) as a key implementation mechanism to promote regeneration, employment and housing growth. LTPs will be prepared with Local Area Plans where appropriate and be consulted on with the NTA and TII. Support for LTPs to assist Development Plan implementation will also support RSES strategy outcomes and aligns with RPO 157 Local Transport Plans.

Conclusion

The SRA welcomes the publication of Proposed Material Alterations to the Draft Cork County Development Plan 2022-2028 and commend the Planning Policy Unit of Cork County Council on the in-depth amendments which strengthen the content of the Development Plan, strengthen implementation of key objectives which will deliver the objectives of the NPF and RSES and which have addressed the previous recommendations of the SRA to the Draft Plan.

These observations are provided to assist and demonstrate that strengthened alignment between the Draft Development Plan and RSES Strategy is being achieved through these proposed amendments.

The RSES team are available for further consultation and for any clarification required regarding this submission.

Mise le meas

A handwritten signature in blue ink, appearing to read 'David Kelly', written in a cursive style.

David Kelly

Director Southern Regional Assembly