

Cork 2024
Delivering the National Planning Framework

Cork County Council and Cork City Council

**Submission to the First Revision
of the National Planning Framework**

12th September 2024



Comhairle Contae Chorcaí
Cork County Council



Comhairle Cathrach Chorcaí
Cork City Council

TABLE OF CONTENTS

Section	Page
1. Introduction and Key Submission Points	2
2. Cork County Council NPF Submission	
2.1 Key points	7
3. Delivering NPF 2040 in Cork County	
3.1 Introduction	8
3.2 NPF and RSES – Cork County Overview	9
3.3 Cork County Settlement Structure	10
3.4 Population Growth	13
3.5 Employment Growth	14
3.6 Housing Delivery – Consents - Completions and <i>Housing for All Programme</i>	14
3.7 Delivering Compact Growth	19
3.8 Sustainable Transport	22
3.9 A Strong Economy	25
3.10 Infrastructure and Programme Delivery	29
3.11 Climate Transition	32
3.12 Learnings and Key Barriers to Delivery	33
4. Cork County in 2040	34
5. Conclusion	35

Appendix 1 – Population Projections, The Flow of New Households and structural Housing Demand – ESRI July 2024

Appendix 2 – Summary of Cork 2050 Report

Appendix 3 – Feedback on Tracked Changes to the First Revision of the National Planning Framework

Appendix 4 – Infrastructure Requirements for Key Growth Areas in Cork County and Additional Key Enablers

Appendix 5 – Renewable Energy Vision for he Cork Harbour

1. Introduction and Key Submission Points

Cork City Council and Cork County Council (the Cork Local Authorities) welcome the publication of the Draft First Revision of the National Planning Framework (NPF) and the opportunity to contribute to the review process.

This submission comprises a joint statement presented in this introduction, followed by individual submissions from Cork City Council and Cork County Council that set out more focused points on behalf of each respective local authority. This submission represents a continuation of the collaboration of the two Cork Local Authorities under the NPF process – a continuation of the local strategic planning collaboration dating back to the 1970s. In March 2017, as part of the initial NPF process, the Cork Local Authorities undertook the joint initiative that is *Cork 2050*. This evidence-based strategic approach sets out existing capacity for NPF delivery on behalf of Cork, the Region and State. [Cork 2050 - Delivering a Bright Future for Cork | Cork County Council \(corkcoco.ie\)](https://www.corkcoco.ie)

The First Revision of NPF is timely, allowing all participants in *Project Ireland 2040* to reflect on learnings to date and to collectively identify the optimum pathway forward to achieving our shared national goals. The need for the NPF to set a strategic plan to shape the future growth and development of our country has never been more critical. This framework allows for an *All of Government* approach to the complex challenges of arresting biodiversity loss, tackling climate change and the need for the State to move to net zero carbon by 2050. Once finalised, the revised NPF will and set out a revised approach for the content of the next Regional Spatial and Economic Strategies, Cork City Development Plans and Cork County Development Plan.

The Cork Local Authorities strongly support the Project Ireland 2040 process as providing the potential to address the significant spatial, societal, economic and environmental issues facing Ireland and are committed to playing their role in ensuring the success of the NPF. The NPF currently supports the sustainable development of Cork City and County with ambitious growth targets recognising the significant capacity of Cork to contribute towards more balanced development in the State. In particular, Cork City and its Metropolitan Area are identified to be more significantly scaled and compact, acting as the driver for the southern region, effectively complementing the economic strength of Dublin. It is critical that the NPF review continues to support Cork City and County by increasing commitment to and alignment with national funding and implementation priorities. This increasing commitment can realise Cork's significant potential in fulfilling its intended role in the NPF.

The First Revision of the NPF focuses on the need to update on ongoing changes and challenges to realising Government policy, since its initial publication six years ago. These challenges include increased delivery of climate transition, regional rebalancing, biodiversity, renewable energy, marine spatial planning, digitalisation and prioritised alignment of critical investment and infrastructure. The need for a longer transition to deliver the NPF growth scenario is now clear. The First Revision of the NPF offers a timely opportunity to respond to these slower transition rates by introducing new actions designed to reinforce and accelerate delivery at regional and local levels.

The Cork Local Authorities welcome many aspects of the Draft Revision that continue to support the delivery and key aims of *Project Ireland 2040* including more balanced distribution of growth across all of Ireland's regions, increased emphasis on managing climate transition, the need for greater alignment between the NPF and the NDP and the investment plans of the statutory infrastructure providers, the importance of Land Activation and Active Land Management, the important role of the National Biodiversity Action Plan and the EU Nature Restoration Law and the forthcoming National Restoration Plan.

There are also aspects of the Draft Revision that both Cork Local Authorities consider can be enhanced for the benefit of the Region and State. While the individual submissions from Cork City Council and Cork County Council include more specific commentary, the following key issues are of relevance to both local authorities and are critical to the successful delivery of *Project Ireland 2040*:

Regional Parity

Coherent NPF policy for regional parity is undermined by major structural and embedded investment imbalances inhibiting the achievement of national targets with no change evident to business-as-usual trajectory of the current national growth trends. There is therefore a significant divergence between policy and investment which must be addressed in this revision. The Draft Revision should be strengthened to acknowledge and address the lack of alignment between objectives for regional parity and the structural and funding model to achieve this objective.

Resources

The funding allocated to the Cork region under *Project Ireland 2040* neither takes full advantage of the strategic planning legacy within Cork nor reflects Cork's delivery capacity. Additional resources are required to deliver the NPF growth targets for Cork. At a minimum, the Cork Local Authorities should be allocated the same growth as previously identified in the NPF and NPF Roadmap, with existing capacity to deliver an even higher growth target if appropriate supports are put in place.

Funding Models

While funding under URDF and RRDF has been welcome, a competitive bidding process between local authorities is not an appropriate means to achieve efficient and effective strategic change. There is a need to revise existing NPF funding structures to ensure a renewed focus on implementation at local level. This revised structure should be complemented and enhanced by strategically targeted and sustained local funding streams. These new funding models would provide a more coherent, long term financial backing for local authorities to achieve the change required under the NPF. A longer term (10-year) horizon would be beneficial, enabling Local Authorities to have greater funding certainty to deliver the NPF. Meaningful engagement is required with local authorities and other state agencies to identify more effective funding that enables NPF implementation. This needs to be achieved in a way that ensures the investments are affordable, which will require augmented funding by the Exchequer.

Cork's History of Strategic Planning

Cork's historic strategic planning framework has been a critical driver in the overall success of many aspects of its spatial planning and investment to date. This continued approach has successfully positioned Cork as a central driver in delivering the NPF's vision. The principles and growth strategy set out in *Cork 2050* continue to be realised through the implementation of both Local Authorities' plans and strategies. Increased support for this continued strategic planning in Cork is required to underpin the delivery of NPF and build on existing capacity to deliver on behalf of the Region and State.

Growth targets

This submission demonstrates how both Cork Local Authorities are increasingly delivering sustainable and compact growth - delivering growth / growth conditions to meet their NPF targets? However, external barriers exist to activation and long-term delivery in accordance with the NPF NSOs (as set out further below). Given the findings of the "*Report of the Housing Commission (May 2024)*", including the significance of pent-up housing demand, the proposed

revisions should reinforce future ambitions for Cork by increasing its targeted growth. In order to fully address the housing crisis, it is crucial that future housing targets take full account of pent-up housing demand. There is strong concern regarding the downgrading of growth ambitions which undermines balanced regional development. In this regard it is noted that recent ESRI Report “*Regional Demographic and Structural Housing Demand Research Report (2024)*” projection provides for a 2040 population for Cork (City and County) of 690,300. This is significantly lower than the projection provided in Appendix 1 of the SR RSES which provided for a “population potential” of 773,000 for Cork to 2040 (336,000 for Cork City and 437,000 for Cork County) or the 750,000 figure, identified in Cork 2050 Submission to the previous NPF for 2040.

Notwithstanding the above, the growth targets for Cork City and Cork County need to be supported through rebalancing of the regional distribution of planned investment. The outcome of the current planned infrastructure investment is an increased focus of growth and economic development on Dublin and the wider Mid-East, over and above the Business-As-Usual scenario presented by the ESRI. The updated ESRI population projections set out in the “*Regional Demographic and Structural Housing Demand Research Report (2024)*” highlight the need for enhanced measures to ensure that the Government’s balanced regional development objective can be achieved, and Cork can play a key role in delivering this.

Cork as Ireland’s Second City

Cork City with its Metropolitan Area is an emerging European Second City of scale that continues to grow as an internationally competitive and sustainable city. As Ireland's second-largest city, Cork provides an attractive, high-quality, resilient place in which to live, work, visit, learn and do business. Cork is well poised to deliver NPF objectives for ambitious growth, with a series of new strategies and projects in place. The NPF Revision should acknowledge Cork City and the Cork city-region as a spatial entity of international scale that can counterbalance Dublin, and allocate commensurate, ambitious growth targets for the City and the City Region.

Key Towns

References to Key Towns and the settlement network within Cork should be strengthened, including the role / potential they play outside of Metropolitan Cork 40% of County Cork residents live. The NPF needs to acknowledge and address the challenges to developing on brownfield land across the whole settlement network, in addition to Cork city. Therefore, there should be a specific National Policy Objective included that prioritises addressing vacancy and dereliction in rural towns and villages to reverse population decline, combat inappropriate settlement patterns, and create vibrant, sustainable communities for current and future generations.

Brownfield Development and Regeneration

NPOs 98 to 101 should be revised to provide dedicated support for development of Brownfield land and address fundamental challenges of financial viability of brownfield land and apartment delivery. These issues are more pronounced in urban areas outside of Dublin. Policy and supporting mechanisms that will enable the higher density development of Brownfield lands will assist in promoting compact growth and regional growth. Also, the NPF needs to acknowledge the significant viability challenges of delivering Greenfield development that are hindering housing delivery in all parts of the country.

Active Land Management

Increasing active land management resources at local level will better align public and private actors, infrastructure delivery, project level funding and housing delivery at scale. In addition, supporting tools for local land acquisition and activation that benefit the ongoing legislative changes are needed. Increased support for this approach at local level will significantly benefit the rate of delivery of both Brownfield and strategically planned Greenfield housing delivery, enabling an increased scale of delivery of compact growth in line with the NPF.

Climate Transition

The latest climate reports show the need for greater urgency in delivering local climate adaptation measures that tackle sea level rise, increased temperature rise, extreme weather events and the changing patterns of precipitation. The increased reference to Climate Transition in the NPF revision is supported. Given Cork City's status – along with Dublin – as an "EU Mission City" and Cork County's role as the lead authority in the Climate Action Regional Office (CARO) there is an opportunity for the NPF Revision to include further details on the increasing role of cities NPF growth locations in the delivery of the European Green Deal. The Draft Review should include an increased focus on Cork's overall leadership role in meeting the challenges of climate change and its EU Mission City status (e.g. a case study) which sets out the Mission's overall support for increasing delivery of climate transition measures, investment in renewable energy and transport oriented development, and increasing actions that enable transition to a low carbon city and a climate resilient society.

Offshore renewable energy (ORE)

Given the Government's declared support to recognise and address the National climate and biodiversity emergency, there is an increasing need to support the planning and delivery of sustainable renewable energy production, connectivity and supply that decarbonises the region. The revised NPF needs to emphasise the significant role of ORE in addressing imbalanced regional development and highlight the opportunity for Cork as a first mover in this field, including the need to prioritise the progression of DMAPs for the Southern Region. The Draft Review should recognise in particular the strategic opportunities of Cork harbour and coastline's unique collection of strategic national assets, including its ports, which make it the ideal location to be among the early movers of Ireland's offshore wind industry and a primary location for a green industry hub with significant onshore opportunities.

Jointly Delivering Sustainable and Compact Population, Employment and Housing Growth

Since the introduction by the two Cork local authorities of their first post-NPF Development Plans, Cork has delivered on its NPF targets, particularly in terms of population, employment and housing, as follows:

Population Growth:

- Population growth in Cork – overall and by location – is on trend to meet its Cork 2050 population target of 850,000. At this scale, Cork has the potential to deliver the NPF's counterbalance to Dublin with the right supports.
- During the last intercensal period, Cork City and County population grew by 7.6% in comparison the combined population growth of the four Dublin local authorities was 8.2% (LGMA Census 2022 Population Increase by Local Authority: A Review of Preliminary Data).
- Cork City is Ireland's largest city outside of Dublin City.
- Cork County is Ireland's largest local authority by population outside of Dublin City, with population growth commensurate with that of the four Dublin local authorities.

- c.80% of Cork’s intercensal population growth occurred within the Cork City and Cork County settlement network.

Housing Growth:

- Based on the NPF / NPF Roadmap HST Methodology Guidelines, the County and City Development Plans have a combined annual target of 6,569 new residential units for Cork. The two local authorities in Cork currently have 22,165 residential units that are consented but not activated – in excess of a three year housing supply.
- In the past two years (since the adoption of the City and County Development Plans) 90% of all residential units permitted are located within settlement development boundaries.
- 66% of those residential units consented are located within Metropolitan Cork.
- 60% of residential consents outside of Cork City and within Metropolitan Cork are located in rail based settlements.
- In the past two years (since the adoption of the City and County Development Plans) almost 50% of all scheme housing consented is for apartments.

Employment Growth:

- Employment growth in Cork is also on trend to exceed its 120,000 jobs growth target as set out in Cork 2050. During the last intercensal period job numbers increased by over 30,000, one of the largest growth locations in the State (Press Statement Census 2022 Results Profile 7 - Employment, Occupations and Commuting Cork - CSO - Central Statistics Office).
- In terms of location, over 70% of employment growth occurred within Metropolitan Cork, with above average growth occurring at TOD locations and within settlements.
- Outside of Metropolitan Cork, within Cork County employment growth significantly above national averages was achieved within the County’s Key Towns and Main Settlements.

The two Cork local authorities submit that they are delivering sustainable and compact population, employment and housing growth. However, external barriers exist to activation and long-term delivery in accordance with the NPF NSOs –as set out further below.

The following sections of this joint submission comprise individual submissions from Cork County Council and Cork City Council.

2. Cork County Council NPF Submission

This section of the submission reiterates the basis upon which the existing population and employment growth targets were allocated to Cork County under the NPF and why those targets need to be retained and increased.

This submission also highlights additional key points regarding the draft revision of the NPF and its implementation.

2.1 Key Points

1. As a counter-balance to urban sprawl and congestion, and arising from the *Cork LUTS* and *CASP*, since the 1970s Cork has developed a sustainable settlement network across the County, with settlements each fulfilling important socio-economic roles within their catchments. Like the NPF, these frameworks recognise the role of the Metropolitan Area as a key regional driver, with a vibrant city at its heart, and with self-sustaining county settlements / rural areas.
2. Since the adoption of the *NPF*, the *NPF Roadmap*, *National Regional Spatial and Economic Strategies*, *National Development Plan*, *Housing Supply Targets* and the *Cork County Development Plan 2022-2028*, in the past two years Cork County has delivered population, employment and housing growth in alignment with NPF strategic policy objectives.
3. Population and employment growth targets allocated to Cork County under the NPF should, as a minimum, be retained.
4. Based on Cork's realistic potential to act as a counter balance to GDA growth, the potential additional 200,000 population growth arising from the ESRI's higher international migration scenario should be provisionally allocated to the Cork Region – where the capacity, assets and critical mass to support this population are available.
5. Recognition in the final draft of the revised NPF the Key Enablers required to unlock the County Metropolitan Area's potential, including:
 - **East Cork Rail Corridor TOD investments** – delivering sustainable, compact growth;
 - **M28** – facilitating relocation of port activities and additional existing city dockland uses;
 - **N/M20** – delivering balanced regional development and economic growth;
 - **N25 Upgrade** - delivering balanced regional development, economic growth, facilitate relocation of port activities and additional existing city dockland uses;
 - **Great Island Connectivity Scheme, including R624 upgrade** – facilitating relocation of port activities and additional existing city dockland uses and economic growth;
 - **Delivery of Offshore Renewable Energy** - facilitating exploitation of Cork Harbour energy sector, exploitation of Cork offshore energy generation potential, addressing renewable energy targets and balanced regional development – see Appendix 5; and,
 - **R630 Midleton/Whitegate Road** – facilitating exploitation of Cork Harbour energy sector and offshore energy generation potential.
6. Since 2018, NPF policy (and complementary national planning policies) has been transposed into local planning policy and development consents. The final stage in delivering Project Ireland 2040 / NPF is the *activation* of growth. The following will be required in this regard:
 - a. Alignment and co-ordination of all growth delivery actors, focused on activating projects that delivery NPF growth
 - b. Delivery of Key Enabling Infrastructure
 - c. Adequate and targeted funding at the point of activation (settlement & site levels)

3. Delivering NPF 2040 in Cork County

3.1 Introduction

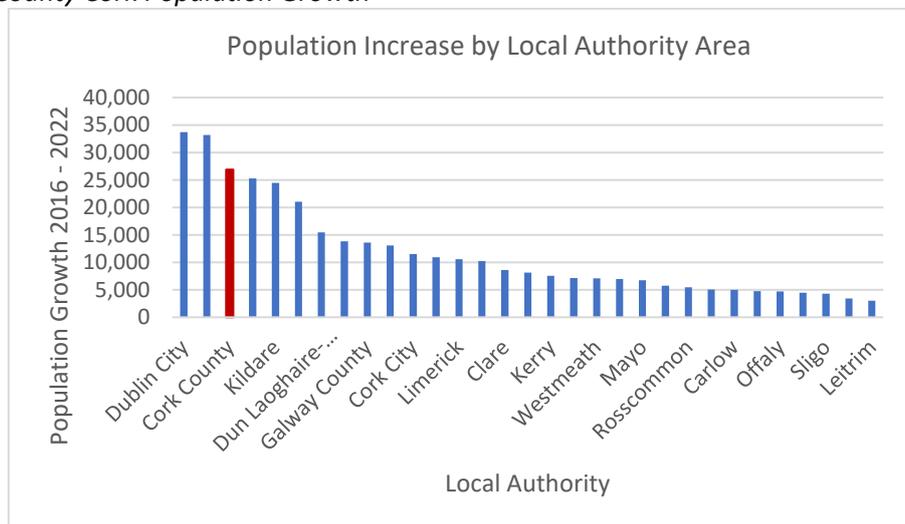
The NPF was introduced in 2018 and followed by a series of policy adjustments between 2018 and 2022, including; the NPF Roadmap, National Regional Spatial and Economic Strategies, National Development Plan, Housing Supply Targets and local authority Development Plans.

Notwithstanding the collective resources that were required to put this 2018 to 2022 statutory policy suite in place, Cork County Council (in conjunction with key stakeholders) has already begun delivering the key objectives of Project Ireland 2040.

The key growth information set out below demonstrates that the County settlements are delivering targeted growth at Transport Orientated Development locations, in compact growth form.

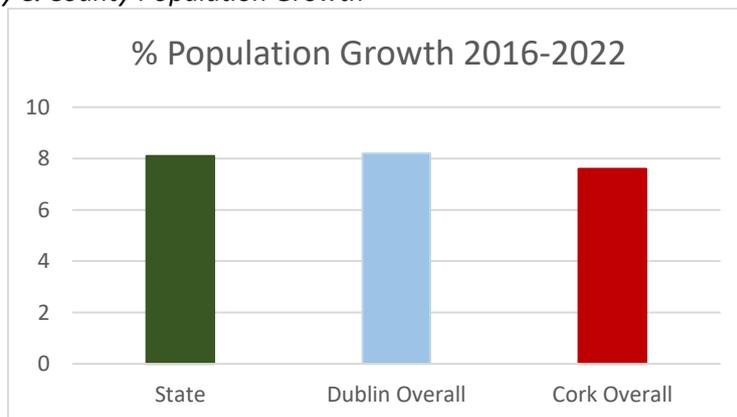
Cork County Council is the second largest local authority in the State and has the third largest population growth by local authority in the last intercensal period – 28,137 population growth.

Figure 3.1: County Cork Population Growth



Population growth in Cork overall is comparable with growth rates nationally / in Dublin and is on trend to meet its Cork 2050 population target of 850,000. At this scale, Cork has the potential to deliver the NPF’s counterbalance to Dublin.

Figure 3.2: Cork City & County Population Growth



3.2 NPF and RSES – Cork County Overview

The NPF and RSES seeks to make our cities, towns and villages the places where many more people choose to live, work and visit, by 2040. In the county context, for this to come to fruition our towns and villages need to be attractive, vibrant and liveable places, offering a quality of life package that more people are willing to choose in the years ahead.

The NPF also acknowledges that there are many examples of vibrant rural communities across Ireland in towns and villages, as well as within the open countryside and on our islands, while also acknowledging the challenges being faced by rural communities.

A key aim of the RSES is to strengthen the settlement structure of the region, capitalising on the strength of the Cork City and Metropolitan Area, County Towns and of the Network of Towns, while also revitalising Rural Areas and Rural Networks to make it one of Europe’s most creative, innovative, green and liveable regions.

The RSES identifies the following Settlement Typology:

- **Metropolitan Areas** – this includes Cork City, the County Metropolitan towns of Carrigaline, Carrigtwohill, Cobh, Midleton, Passage West and Monard - reinforced by Strategic and Specialist Employment Locations at Little Island, Carrigtwohill, Ringaskiddy, Whitegate and Aghada, Marino Point;
- **Key Towns** – the RSES identifies Mallow and Clonakilty in Cork County as Key Towns;
- **Towns and Villages**; and,
- **Rural Areas and Networks**

The RSES recognises that the **Cork City and Metropolitan Area** is:

- The principle complementary location to Dublin with a strong international role;
- A primary driver of economic and population growth in the Southern Region;
- A compact region with increased regional connectivity, focused on the delivery of sustainable transportation patterns; and,
- Requires accelerated urban focused growth to achieve its role and fulfil its potential.

The RSES indicates that population and employment growth must align with public transport investment, public transport nodal points and focus on regeneration, consolidation and infrastructure led growth of the existing hierarchy of Metropolitan Locations, Metropolitan Towns and the Metropolitan Area’s strategic employment locations.

Spatially, the Cork City and Metropolitan Area will be the focus of growth aligned with an updated sustainable transportation strategy as outlined in the *Cork Metropolitan Area Transport Strategy (CMATS)* finalised in 2020.

The RSES also recognises the important role of **Key Towns and County Networks**. Outside Metropolitan Cork, County Towns and Villages are recognised as important drivers of socio-economic development. County Cork has a strong Network of County Towns and Villages of varying scales and functions within the settlement hierarchy.

The RSES has identified **Mallow** and **Clonakilty** as key towns (large population scale urban centre functioning as self-sustaining regional drivers) and has identified the following additional County Town Networks:

- **North Cork Agri-Food Network** (Charleville, Fermoy, Mitchelstown) in a network with Mallow Key Town leveraging significant potential from food and beverage and agri-tech assets.
- **West Cork Marine Network**: A network based on the N71 West Cork to South Kerry Corridor across settlements of Clonakilty (Key Town), Skibbereen, Bantry, Schull and Castletownbere

leveraging significant marine economy, tourism, food and beverage, digital and other assets with strategic transport connections to the Cork Metropolitan Area.

- **Cork Ring Network:** A network of Ring Towns of Mallow (Key Town), Bandon, Kinsale, Fermoy, Macroom and Youghal which have a strong relationship with the Cork Metropolitan Area and have opportunities for sustainable employment led growth, consolidation and enhancement.

The RSES reflects the NPF position that **our countryside and rural areas** ‘will continue to be, a living and lived-in landscape focusing on the requirements of rural economies and rural communities, based on agriculture, forestry, tourism and rural enterprise’.

Rural Areas, depending on their assets, location and population density have differing needs requiring targeted solutions. A key message of the RSES is that rural areas need diversity and innovativeness to ensure economic resilience and job creation. This requires an integrated approach to rural economic development, including support for public services.

The RSES seeks to expedite the completion of infrastructure servicing diverse settlements in order to support innovation, enterprise start-ups and competitiveness. This includes high-quality broadband and mobile communication services to all rural locations, water and wastewater facilities for the growth of settlements, sustainable energy supply, enhanced transport connectivity including rural public transport services and the delivery of greenway walking and pedestrian corridors between settlements.

The policy objectives in the RSES relating to rural development seeks to:

- Deliver the sustainable actions under the Rural Development Programme 2014-2020;
- Drive initiatives in the Rural Economic Development Zones;
- Support innovation in rural communities; and,
- Encourage diversity in the rural economy.

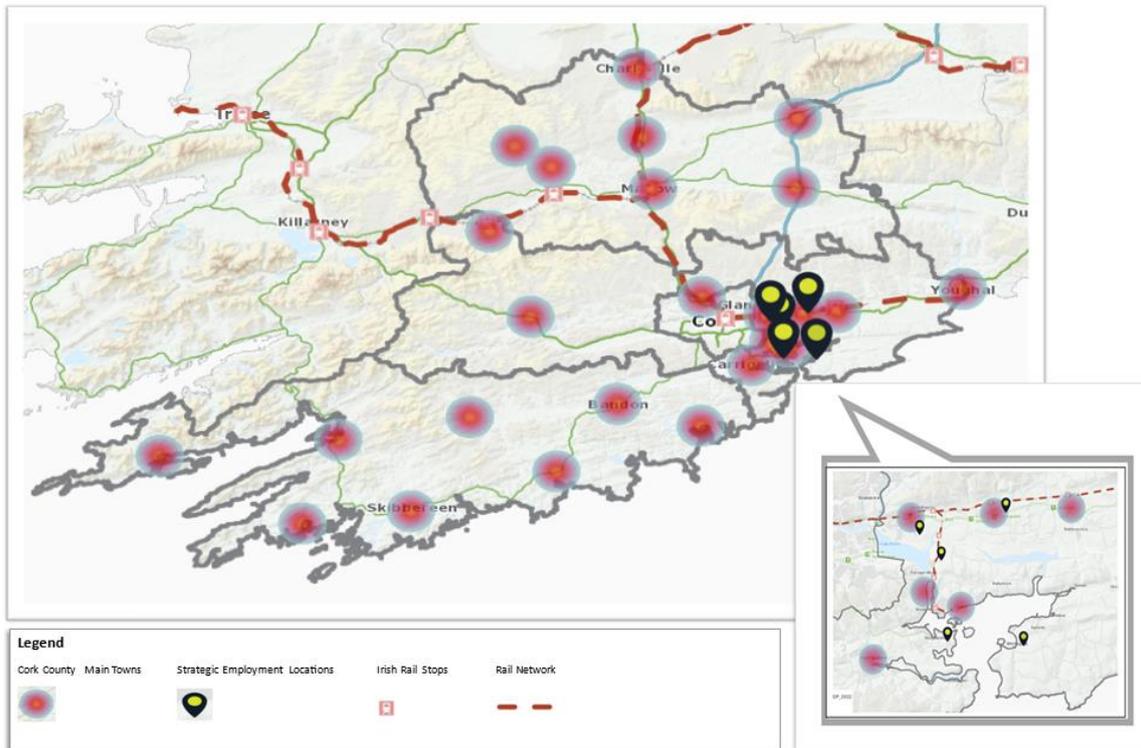
3.3 Cork County Settlement Structure

Cork consists of a city and a strong settlement structure, located within an overall rural area in excess of 7,200km² (c.10% of the national rural area).

Total Number of County Settlements is 172 including:

- Main Towns: 25no.
 - 4no. in excess of 10,000 population
 - 7no. between 5,000 and 10,000 population
 - 14no. under 5,000 population
- Key Villages: 47no.
- Villages/Other Settlements/Offshore Islands

Figure 3.3: County Cork Growth Locations & Strategic Employment Locations



In terms of population within Cork County:

- The CSO has 873 Built Up Areas identified in the State, of which 106 or 12% are located in Cork County; and,
- The population of Cork County that resides outside of the Cork Metropolitan Area is 71% - representing 44% of Cork population overall and 5% of the population of the State.

Cork County has a strong City and settlement network, complemented by strong local employment.

County Metropolitan Cork

As set out in Cork 2050, the unique capacity of Metropolitan Cork, a plan-led, integrated economy and property market with a strong and vibrant Cork City at its heart, to drive escalated rates of economic and population growth to an international scale of over 500,000 persons, is central to the Cork proposition.

This County Metropolitan Area is highly connected to Cork City, with key elements located within the Cork Harbour Area including:

- **Eastern Rail Corridor** - emphasis on compact, higher density, transport oriented and climate resilient development. There is a need to look at the corridor as a single entity and to consider its relationship with the City, the redevelopment of the City Docklands, as well as future housing and employment developments along the corridor.
- **Cork Harbour Economy** – a significant spatial asset, defined by its population, physical infrastructure and employment / economy, with significant growth potential.
- **The Cork Harbour & Coastline’s unique collection of strategic national assets** – including its ports – make it the ideal location to be among the early movers of Ireland’s offshore wind industry and a primary location for a green industry hub with significant onshore opportunities.

It is important that the County Metropolitan Area contribution to realising the strategic role envisaged for Cork for the period to 2040 and beyond is recognised in the NPF.

In particular, the **Key Enablers required to unlock the County Metropolitan Area's** potential need to be recognised in the final draft of the revised NPF, including:

- **East Cork Rail Corridor TOD investments** – delivering sustainable, compact growth;
- **M28** – facilitating relocation of port activities and additional existing city dockland uses;
- **N/M20** – delivering balanced regional development and economic growth;
- **N25 Upgrade** - delivering balanced regional development, economic growth, facilitate relocation of port activities and additional existing city dockland uses;
- **Great Island Connectivity Scheme, including R624 upgrade** – facilitating relocation of port activities and additional existing city dockland uses and economic growth;
- **Delivery of Offshore Renewable Energy** - facilitating exploitation of Cork Harbour energy sector, exploitation of Cork offshore energy generation potential, addressing renewable energy targets and balanced regional development – see appendix 5 also; and,
- **R630 Midleton/Whitegate Road** – facilitating exploitation of Cork Harbour energy sector and offshore energy generation potential.

Develop and provide key strategic infrastructure national road links to enable Cork City to operate and cater for expansion in areas such as housing and employment and the area of ORE (Offshore Renewable Energy). Schemes such as road improvement on the N25 to Waterford, the N71 to Bantry and its Port, the norther ring around the metropolitan area, completion of the M20 Cork to Limerick motorway, and the N22 Cork to Killarney/Tralee link with a bypass of the village of Lissarda and the multiple at grade junctions that exist on this exceptionally busy and high accident location/corridor and Bypass projects facilitating compact growth, urban regeneration and active modes across the County.

The draft revision of the NPF, under *Appendix 2: Population and Employment in Urban Settlements, Census of Population 2022*, sets out the populations of urban settlements in the Southern Region. This data, combined with the employment numbers and jobs:resident workers ratios set out in section 4.5 below, reinforces the critical role and carrying capacities of the county towns across Cork.

Of the towns within the Southern Region, Cork County towns make up c. one third of the number of towns overall, c. one third the population overall and c. one third of the top ten town locations by population.

As set out in the following sections, Cork County is delivering significant housing and employment growth, supported by sustainable transport interventions.

As also set out in the sections below, Cork County continues to demonstrate the capacity to deliver the *NPF National Policy Objectives*, including the critical population, employment and housing targets that underpin the NPF, supported by effective infrastructure and programme delivery.

Critically in terms of *Project Ireland 2040 / NPF*, in the past two years Cork County has delivered high proportions of growth in compact form and at Transport Orientated Development locations – and at locations that can be supported by public transport investment.

It is critical that *Project Ireland 2040 / NPF* continues recognise the sustainable growth potential of the above spatial structure, capable of delivering sustainable population, employment and housing growth supported by active travel and public transport interventions.

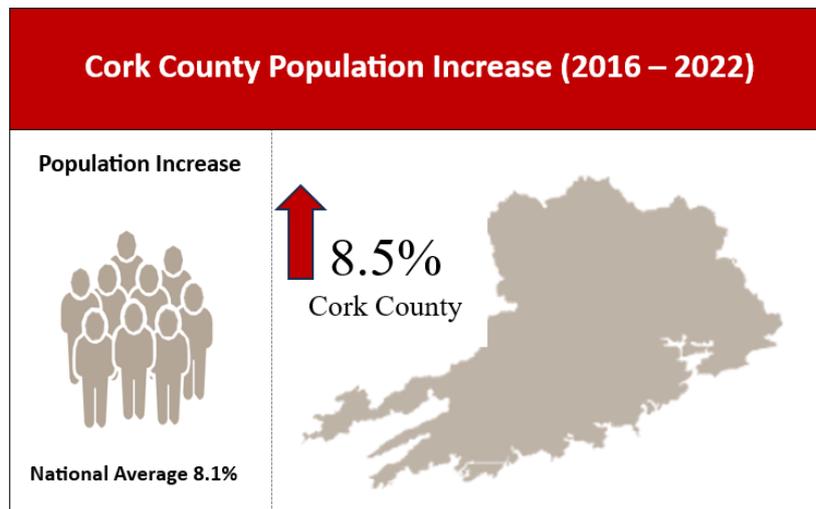
This submission reiterates the basis upon which the existing population and employment growth targets were allocated to Cork County under the NPF and why those targets need to be retained or increased.

3.4 Population Growth

Between 2016 and 2022, Cork County annual population growth rate was 1.36%, continuing a strong population growth rate that extends back to 1991.

From 2016-2022, Cork County population increased by 8.5% - above the national average.

Figure 3.4: County Cork Population Growth 2016-2022



In Cork County, c.70% of the 2016 to 2022 population growth occurred within the County’s settlement network and approximately three quarters of that growth located within the urban settlements listed in the draft revised NPF. This focus on delivering population within the urban settlement network while also facilitating managed growth in rural areas is further reinforced in the *Housing Delivery and Employment Growth* sections below.

70% of Cork County population growth locating within Urban Settlements

Using an average annual growth rate of 1.36% and projecting forward, on this trend Cork County population overall will reach c.460,000 by 2040 and c.530,000 by 2050. However, these projections do not factor in the potential for acceleration under *Project Ireland 2040* and the NPF / NDP.

Cork County population will grow by c.101,000 to 2040.

Under the NPF/NPF Roadmap and RSES to 2040, Cork County is identified to deliver population growth of 105,000 population, with potential to deliver substantial additional growth. Cork County is on trend

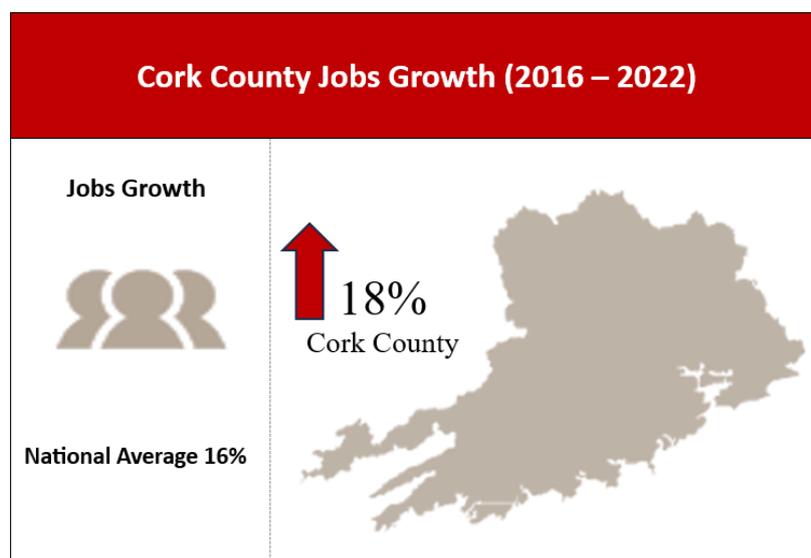
to achieve this NPF growth and, combined with Cork City NPF targeted growth, to deliver an effective counterbalance to the Greater Dublin Area / Eastern Region.

3.5 Employment Growth

The 2022 Census identified 171,626 persons in the Labour Force in Cork County and the County recorded the lowest unemployment rate in the State (at 6.1%).

Since 2016, the number of jobs in Cork County has grown by almost 18%, higher than the national average of 16% - delivering c50% of the jobs growth target set out in the current Cork County Development Plan to 2028

Figure 3.5: County Cork Jobs Growth 2016-2022



In addition, the jobs growth is located at sustainable, strategic locations that support the National Strategic Objectives of the NPF - 45% of the Cork County jobs growth was in County Metropolitan Cork and 40% was in the Greater Cork Ring, with targeted growth in the North and West of the County.

Since 2016, 7,529 new jobs were located in County Metropolitan Cork – 45% of all Cork County new jobs.

This is reinforced at the settlement level via targeted employment growth at key locations, such as:

- Cobh Municipal District (containing Cobh, Carrigtwohill, Little Island & Marino Point, all adjoining Eastern Rail Corridor in County Metropolitan Cork) +20%
- Midleton (also adjoining Eastern Rail Corridor in County Metropolitan Cork) +20%
- Mallow (Greater Cork Ring & Key Town) +19%
- Bandon (Greater Cork Ring Town) +20%
- Kinsale (Greater Cork Ring Town) +19%
- Clonakilty (West Cork & Key Town) +15%
- Mitchelstown (North Cork) +20%

Since 2016, 20% Growth in Jobs in Rail Based Metropolitan Settlements

The above collectively demonstrates an acceleration of targeted employment growth at TRANSPORT ORIENTATED DEVELOPMENT LOCATIONS and self-sustaining settlements.

Cork County's has capacity to delivery sustainable jobs growth, with 63,000 additional persons in employment to 2040. This target reflects the findings of *Cork 2050* that Cork's overall (City and County) has the capacity to delivery an increase in 120,000 jobs by 2050.

Cork County aims to deliver 63,000 Jobs by 2040

3.6 Housing Delivery – Consents, Completions & Housing for All Programme

New housing delivery is a key determinant of population growth locations and to fully understand housing delivery it is necessary to examine a combination of residential planning consents and completions. Through the combination of this data, a full picture of the housing delivery pipeline can be established.

Post publication of the *NPF, NPF Roadmap, National Regional Spatial and Economic Strategies, National Development Plan* and *Housing Supply Targets Methodology Guidelines*, Cork County adopted its current *Development Plans 2022-2028* in 2022, giving effect at the local level to national and regional policies. This Development Plan provides the policy platform to facilitate housing delivery across Cork.

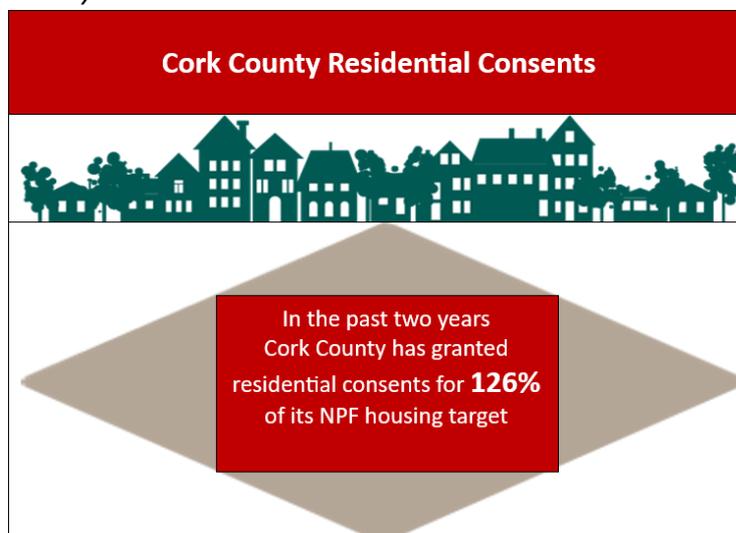
The annual housing delivery target for Cork County is 3,769 residential units.

3.6.1 Residential Planning Consents:

In the two year period after the adoption of the County Development Plan the planning authority has consented 8,465 residential units. These new residential units consented are in addition to over 2,000 residential units with extant consents, permitted prior to the adoption of the County Development Plan but not yet activated. Therefore, since the adoption of its County Development Plan in 2022, the planning authority has delivered residential consents 26% above its annual housing target as set out in its Development Plan. The annual housing target set out in the County Development Plan is based on its NPF allocated housing growth targets.

In the past two years, Cork County has granted residential permissions which have delivered 126% of its NPF housing target.

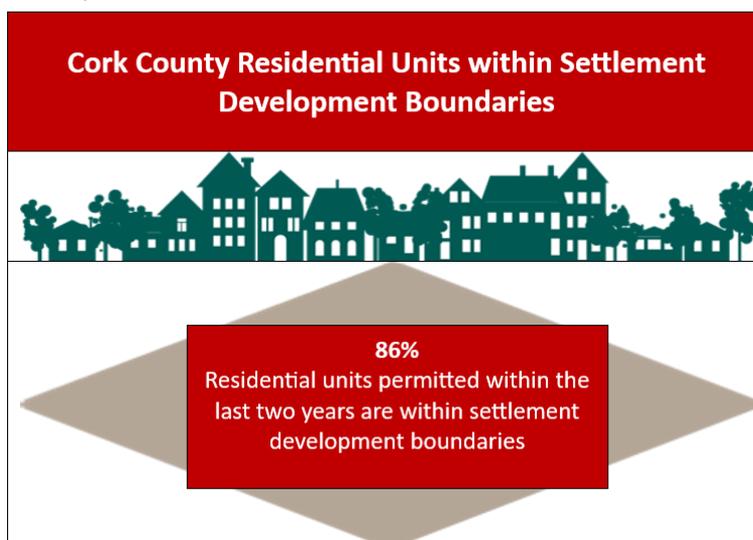
Figure 3.6: County Cork Residential Consents



In terms of location, 86% of residential units permitted are located within settlement development boundaries and 62% of these residential units are permitted within settlements in the County Metropolitan Area, with a further 28% within settlements in the Greater Cork Ring. Of this urban focused housing, 89% of units consented are located in Large Towns to self-Sustaining Small Towns.

In the past two years, in Cork County 86% of residential units permitted are located within settlement development boundaries.

Figure 3.7: County Cork Residential Consents – Settlement Boundaries



At settlement level, in the two year period after the adoption of the County Development Plan housing consent has delivered particularly strongly at key settlement locations, as follows:

- Midleton (adjoining Eastern Rail Corridor in County Metropolitan Cork) – 2,409 units.
- Carrigtwohill (also adjoining Eastern Rail Corridor in County Metropolitan Cork) – 913 units.
- Glounthaune (also adjoining Eastern Rail Corridor in County Metropolitan Cork) – 207 units
- Cobh (also adjoining Eastern Rail Corridor in County Metropolitan Cork) – 95 units
- Mallow (Greater Cork Ring & Key Town) – 465 units

In the past two years, in Cork County 60% of urban housing permitted is located in rail based settlements.

The planning authority continues to also ensure that the housing needs of its rural communities are met and in particular those who have a social/economic link to their local rural areas.

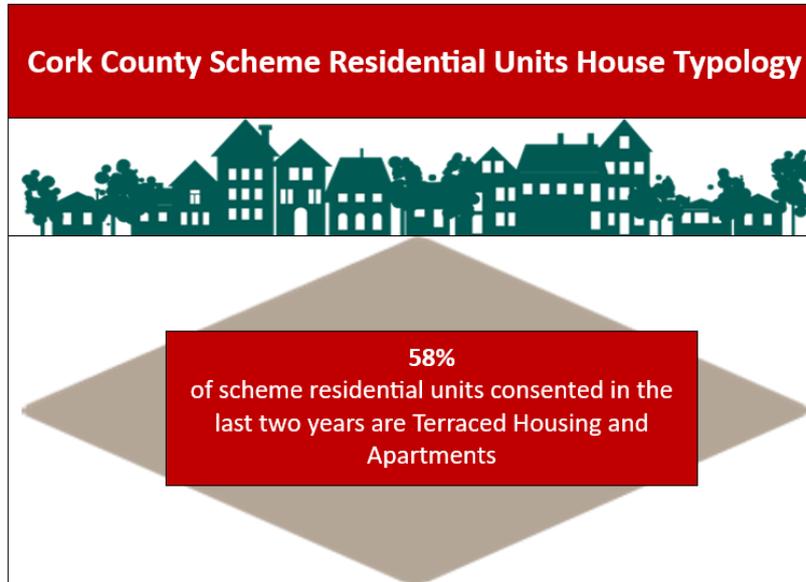
As demonstrated by the above figures, the planning authority is delivering housing growth in accordance with the principles and targets set out in the NPF.

In terms of housing typology, the planning authority continues to permit high-quality residential schemes that reflect national policy in terms of density and design. The breakdown of permitted scheme residential units by typology since the adoption of the County Development Plan is as follows:

- Semi-detached – 34%
- Apartments – 30%
- Terraced – 28%
- Detached - 8%

In the past two years, in Cork County terraced housing and apartments represent 58% of the scheme residential units permitted

Figure 3.8: County Cork Residential Consents – Typology



3.6.2 Residential Completions:

In the two year period after the adoption of the County Development Plan, 4,106 residential units have been completed in Cork County.

In the past two years, 64% of housing completions in Cork overall are located within Cork County

Housing delivery in Cork County compares favourably at the national level. Only Dublin City Council, Dún Laoghaire-Rathdown County Council, South Dublin County Council and Kildare County Council have higher completions numbers for this period, with Cork County figures representing between 64% and 81% of the delivery figures for those Dublin local authorities – all of which are located within the GDA.

In the past two years, Cork County housing completions are comparable to those of the four Dublin local authorities

As set out above, Cork County is delivering sustainable and compact population, employment and housing growth in accordance with the NPF NSOs and complementary national policies. However, external barriers exist to activation and long-term delivery in accordance with the NPF NSOs.

In terms of housing delivery in Cork County - a key driver (with employment) of targeted population growth, enough planning consents are in place to meet almost three years requirements as identified in the CDP Core Strategy and the planning authority continues to deliver consents for residential developments in accordance with national policies relating to densities and location (compact growth).

However, in the past two years only 55% of Cork County’s NPF housing target is being delivered via completions.

In 2021 Cork County Council published its report, *Understanding Cork County NPF Housing Delivery Challenges; from Strategy Formulation to Activation*. As set out in this report, it is the experience of Cork County Council that the under-activation of housing arises largely from viability / affordability, alignment of delivery actors and infrastructure delivery challenges.

Government initiatives to address these barriers via ‘Housing For All’ and additional infrastructure agencies / funding programmes are recognised and welcomed, however all evidence suggests that these interventions require to be more targeted and aligned at the site / settlement levels.

3.6.3 Housing For All:

Since the inception of the NPF, Cork County Council has been proactively utilising the various funding programs and toolkits available to us to grow its delivery of social & affordable housing under Housing for All and its predecessor Rebuilding Ireland.

Cork County Council has repeatedly shown itself to be a national leader in the delivery of social & affordable housing, as follows:

- 2,472 new build social housing units have been delivered in Cork County since 2018 under Housing for All and its predecessor Rebuilding Ireland
- Cork County Council was project lead on Bundle 2 of the national PPP social housing project which delivered 150 new social houses on three sites in Cork in 2021. Cork County Council is now project lead on bundle 6 of this project, which is presently planning the delivery of 220 new social homes and 150 new affordable homes on four sites across Cork County.
- Approval has been issued for 176 Local Authority Home Loans since 2023, with loans to the value of €7.4m drawn down to date
- 360 Rebuilding Ireland home loans were issued in the period 2017-2021 with loans to the value of €30.3m drawn down.
- 5 Affordable purchase schemes have been advertised for sale since 2023. The first 2 schemes in Carrigaline & Cobh consisting of 81 units are sold out. 3 further schemes in Fermoy, Midleton & Bandon are presently on sale with 53 units available to first time buyers
- The Council has a significant affordable purchase pipeline in place with 451 units currently at various stages in the development process on Council owned sites in Carrigaline, Midleton, Kinsale, Clonakilty & Mallow and on developer owned sites in Watergrasshill, Passage, Bantry, Carrigtwohill, & Macroom.
- The members of Cork County Council have approved €80m in borrowing to supporting the delivery of a cost rental program of €120m in value that will deliver up to 370 new cost rental units in the coming years.
- Cork County Council has issued 589 grant approvals to date under ‘Croi Conaithe’, with €2.238m issued in grants to support the return of vacant property to productive use.
- An affordable purchase Scheme is being delivered under ‘Project Tosaigh’ in Mallow in partnership with the LDA. This has allowed 30 affordable houses be sold to approved applicants, with a further 25 units currently on sale in the final phase of the scheme.
- The ‘Housing for All’, land acquisition fund was established in 2023 and to date Cork County Council has acquired three sites under this funding stream, including a large site in Kinsale that will deliver ca 50 units, whilst there is a further site approved for acquisition under the fund in Carrigaline that will deliver ca 56 units.

In addition to the above collaboration under various housing delivery programmes, *Cork County Council has also been proactive and innovative in seeking to unlock development sites. HISCo, a joint venture by Cork County Council with ISIF, provides funding for necessary off-site and on-site*

infrastructure, addressing a key challenge in housing activation. To date, HISCo has supported the delivery of enabling infrastructure to facilitate in excess of 6,000 homes nationally.

3.7 Delivering Compact Growth

The growth development trends set out above demonstrate clearly that Cork County is delivering targeted housing and employment growth, focused on key growth locations in line with the NPF / RSES policies.

This growth trend is highlighted by the number, location and typology of urban residential units consented since the adoption of the current County Development Plan 2022-2028. This delivery of planning consents for sustainable housing growth is complemented by similar trends in employment growth and together these support the delivery and viability of planned for active travel / public transport interventions.

This combination of housing and employment growth as described above delivers the development trends sought by *Project Ireland 2040 / NPF* and are the foundations for population growth trends envisioned in those frameworks.

However, targeted supports to activate the sustainable NPF projects that the local planning system is delivering are key to completing the delivery of Project Ireland 2040 / NPF.

It is also important to note that successive County Development Plans, building on the *1978 Cork Land Use and Transportation Study*, *2001 Cork Area Strategic Plan* and its *2008 Update* and the *North and West Cork Strategic Plan 2002 to 2020*, have brought forward growth in compact forms across a network of Metropolitan Town and self-sustaining County Towns.

In utilising this strategic approach to land-use and transportation planning, settlements within Cork County delivered growth at appropriate settlement scale that did not allow for urban sprawl, as has been experienced in some other urban locations nationally.

The suite of housing and employment growth sites identified in the current County Development Plan 2022-2028 will deliver compact and public transport orientated growth.

The figures overleaf are examples of the compact nature of Cork County's settlements as walkable 15-minute towns – shaded areas indicate 15 minute walking distances.

Figure 3.9: Midleton 15 Minute Town – County Metropolitan Cork Rail Based Growth Location, with significant Mixed-Use Urban Expansion Area of Water-Rock (housing development to commence in 2024), URDF supported public realm improvements and UE water services investment:

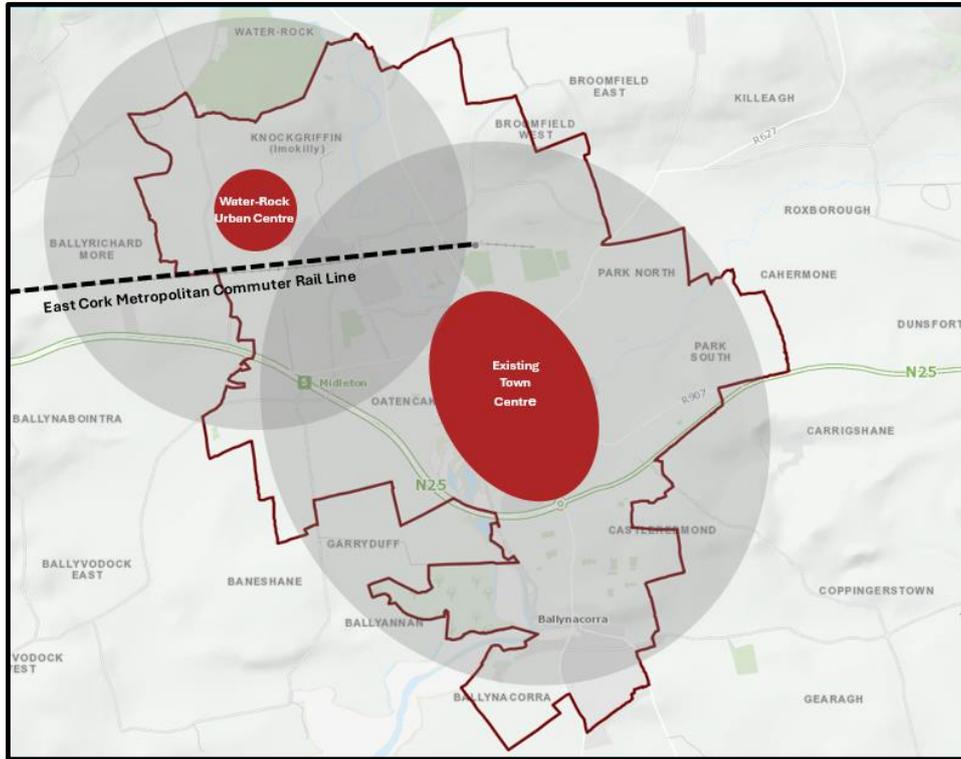


Figure 3.10: Carrigaline 15 Minute Town – County Metropolitan Cork Growth Location, adjoining Strategic Employment Location of Ringaskiddy, with recently completed URDF supported Relief Road and public realm improvements underway:

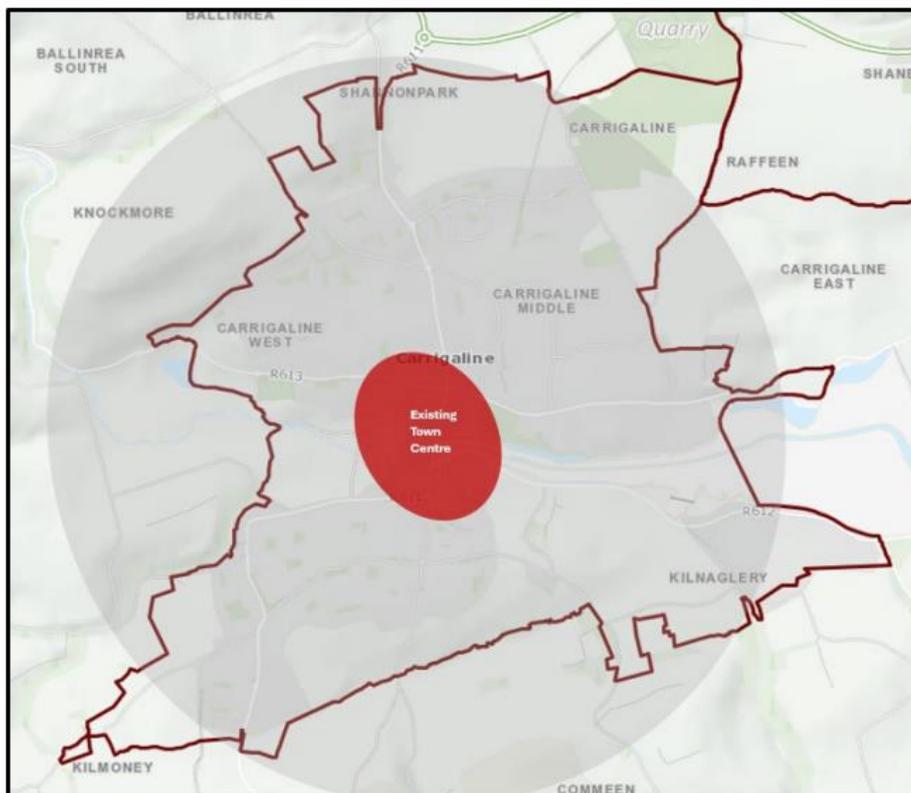
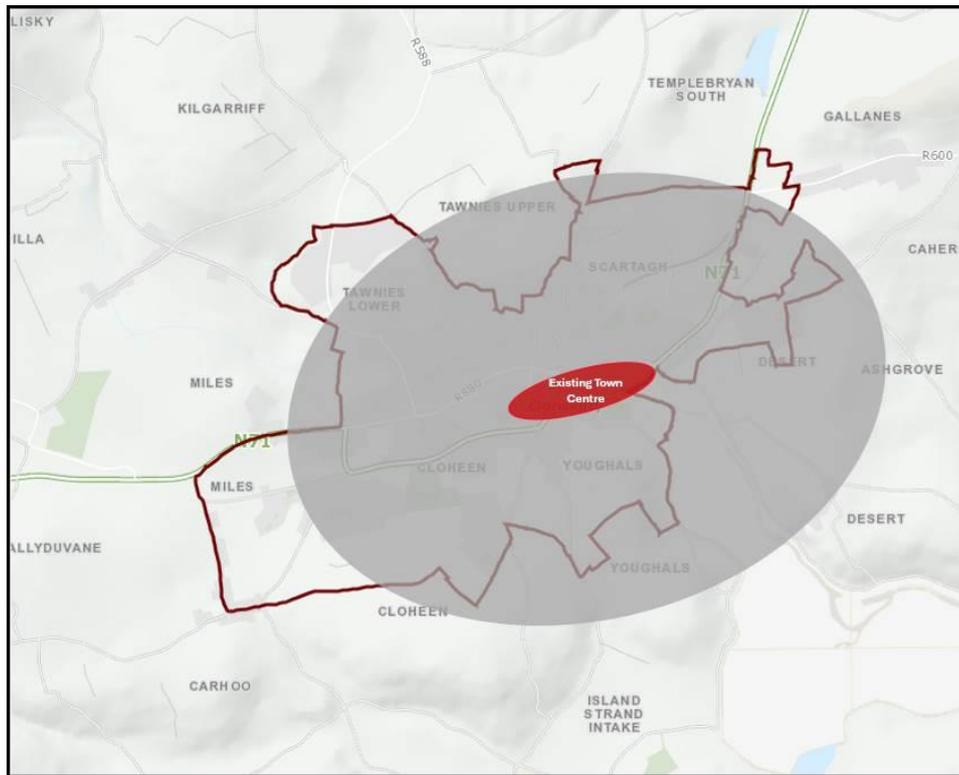


Figure 3.11: Clonakilty 15 Minute Town – Key Town - West Cork Growth Location, high local employment ratio and high quality public realm:



Provision of Recreation and Community Facilities

The provision of recreation and amenity facilities to cater for the growth in population across the County is a significant challenge for the Council. There needs to be better joined up delivery between the various Government Agencies involved to provision of educational and health services to ensure the timely delivery of same. It is also critically important that provision is made for additional investment in community and recreational facilities in areas that have seen substantial growth in the last 15-20 years and that are identified for significant additional growth in the future particularly along the rail corridor in settlements like Glounthaune, Little Island, Carrigtwohill, Midleton and Cobh.

Green and Blue Infrastructure (GBI)

Increased funding for the delivery of strategic GBI and projects including greenways, blueways and nature restoration projects across the city, metropolitan area and county can support increased delivery of nature-based solutions, biodiversity net gain, flood risk management, and strengthen regional and local ecosystems and biodiversity networks.

It is critically important that the provision of recreation and community facilities is plan led, with significant national ring fenced multi annual investment programmes so that they are delivered in a timely and co-ordinated manner to support existing and new sustainable communities.

3.8 Sustainable Transport

Cork County Council has a dedicated Sustainable Travel Unit facilitating the planning, design and delivery of sustainable travel infrastructure throughout the County. Schemes include active travel interventions, such as Cork County Metropolitan Area pedestrian & cycle network, the bus network enhancement programme, which entails the installation and upgrade of bus shelters and stops including the installation of accessible stops, and the Safe Routes to Schools (SRTS) programme.

Annual funding allocations by the National Transport Authority (NTA) has enabled the delivery of several high-quality sustainable travel projects. A significant proportion of this funding is allocated to the Metropolitan Area, while funding has also been extended countywide across all Municipal Districts to include towns and villages.

Since 2020 Cork County Council has received over €55m in funding from the NTA under the Active Travel Investment Grant. This will rise to over €75m by then end of 2024. The majority of this funding is targeted within the Cork County Metropolitan Area. The key Active Travel projects in Cork County are as follows:

- East Cork Sustainability Corridor (part of Governments National Pathfinder Programme) – Inter-urban pedestrian and cycle route between Dunkettle and Midleton. It will provide connectivity to the MY Greenway in the east and to Cork City’s network to the west.
- Carrigaline Transportation and Public Realm Enhancement Plan (TPREP) (integrated public transport and public realm enhancement)
- Little Island Sustainable Transport Infrastructure (enhancement of sustainable transport infrastructure serving a key strategic employment rail-based location) – as well as providing connectivity between the employment centre and the train station it also serves as an extension of the East Cork Sustainability Corridor into Little Island.
- Passage West Link (pedestrian and cycle route providing high quality connectivity between Carrigaline, Monkstown and Passage West, and Cork City)
- Carrigaline to Ringaskiddy Pedestrian and Cycle Route
- Ballinacurra to Midleton Cycleway - an extension of the East Cork Sustainability Corridor to Ballinacurra.
- Cobh Ferry to Town Centre Route – will connect Cobh into the wider Cork County Metropolitan network via the cross river ferry.
- Towns and Villages Active Travel Fund
- Safe Routes to School (SRTS)
- Bus Shelter and Accessible Bus Programme
- Midleton Youghal Greenway Link to Greenpark / South Abbey, Youghal
- Carrigtwohill & Midleton Urban Expansion Area Connectivity Initiatives

The above Active Travel / Public Transport interventions complement the targeted housing and employment growth trends within the County, as set out in section 4, with particular focus on supporting sustainable Transport Orientated Development.

Within the eastern rail corridor, the Council has developed an active travel network that is fully integrated with the rail network, e.g. links to rail stations and the bus network.

Figure 3.12: Countywide bus public transport main routes and bus shelter delivery programme – serving key NPF Growth Locations:

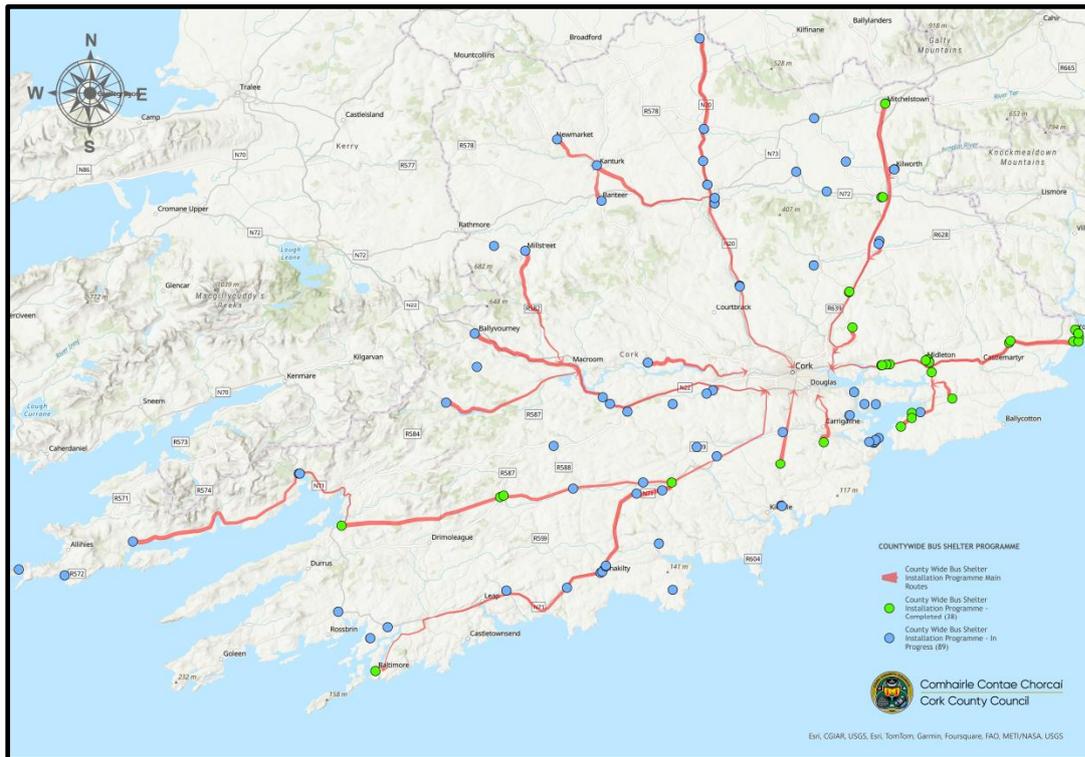
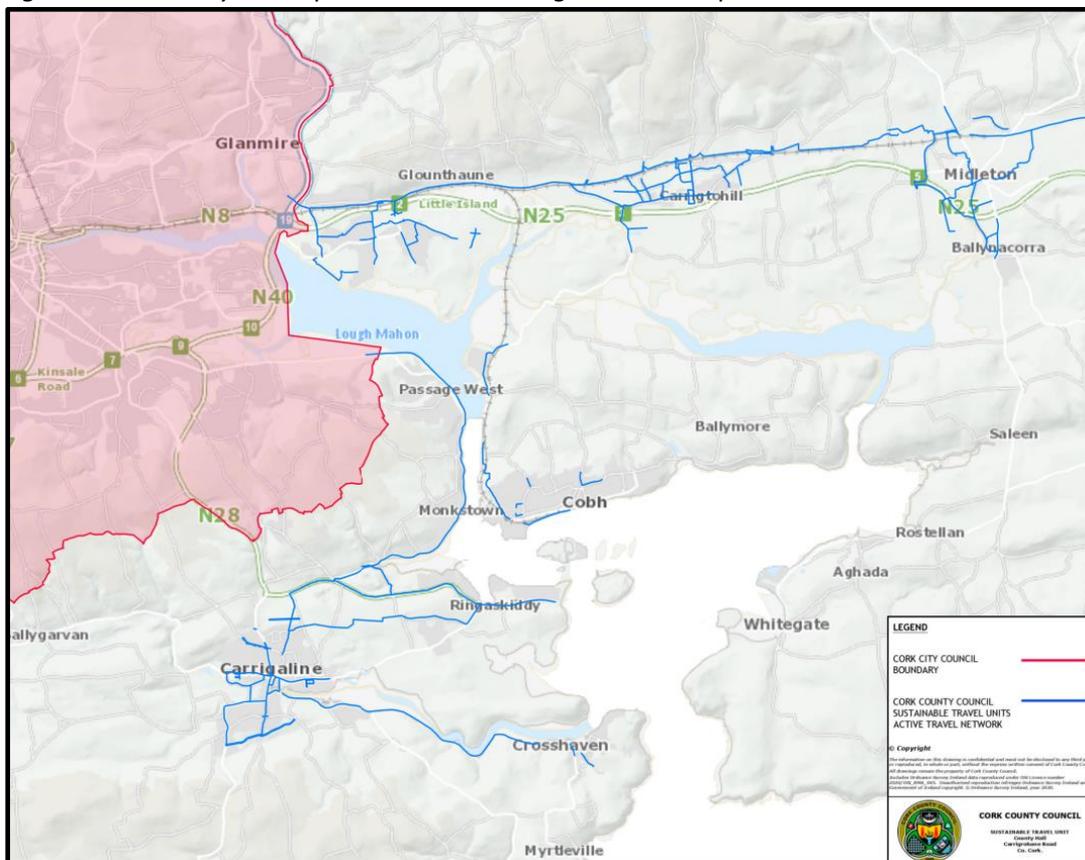


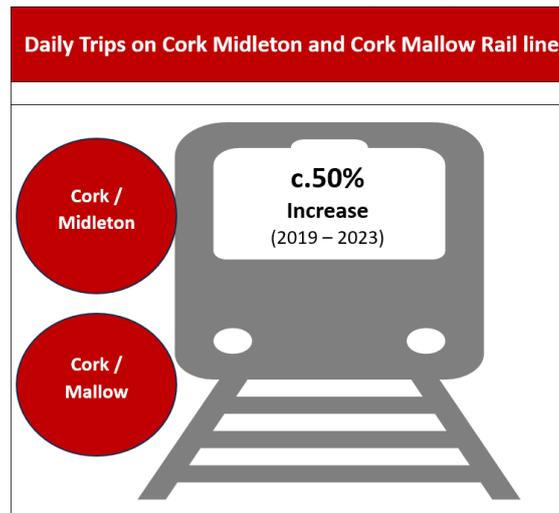
Figure 3.13: County Metropolitan Cork Growing Public Transport & Active Travel Network:



Also within Metropolitan Cork, in addition to pricing initiatives, the existing Cork Area Commuter Rail Network was enhanced in 2022, with a new 30-minute timetable launched on the Kent to Cobh and Kent to Midleton lines. Iarnród Éireann has doubled the number of weekday trains operating during daytime off-peak on both lines from every 60 minutes each way currently, to the current peak frequency of every 30 minutes, to/from both Cobh and Midleton.

Between 2019 and 2023, daily trips on the Cork/Midleton and Cork/Mallow Rail line increased by almost 50%.

Figure 3.14: County Cork Residential Consents – Typology



Cork County Council continues to work in partnership with IÉ, to achieve its objectives under the Cork Area Commuter Rail Programme (CACR). This ambitious programme is being delivered under seven separate but interrelated projects to deliver its heavy rail vision. Three elements of this project are at an advance delivery stage.

- Construction of a new platform at Kent Station to facilitate through running services from Mallow to Cobh/Midleton commenced in October 2023.
- Signalling and Communications Upgrade to facilitate the capacity and service upgrades commenced in 2023. These works are expected to be completed by the end of 2026.
- The Railway Order (RO) for the upgrading of the Glounthaune to Midleton line to twin track was granted by An Bord Pleanála in 2023, with works due to commence in Q2 2024. These works are also expected to be completed by the end of 2026.

The overall projects will see significant investment in the Mallow through Cork to Cobh and Midleton rail network, including the construction of 8 new stations including at Dunkettle, Carrigtwohill West, Water-Rock and Ballynoe, delivery of a new electric fleet, delivery of a transformative 10-minute service frequency, a multi-modal integrated transport hub at Kent Station and other infrastructural enhancements.

This investment represents the largest ever investment in the Cork Rail Network, aligning with the County Development Plans future population and economic growth strategy along this strategic corridor.

The delivery of housing and employment growth within Metropolitan Cork by Cork County Council continues to be aligned with the above State interventions in public transport, such as the Water-Rock LIHAF project securing Part 8 planning approval for the new Water Rock Rail Stop by agreement with

larnród Eireann. Water-Rock Urban Expansion Area will deliver 2,500 homes as part of a public transport orientated, mixed use development.

Passenger journeys also continue to grow across both Expressway and PSO services and Bus Eireann is one of the fastest growing public transport providers on passenger journeys. Expressway passenger journeys have returned to pre-COVID levels at an overall network level. Improvements in services, new schemes, changes to ticket options, to meet growing demand are underway.

Outside of the rail network, delivery of enhanced bus services to County Towns not served by rail services is critical. In particular, the County Towns within Metropolitan Cork and the Greater Cork Ring Area form part of the large Cork employment market.

3.9 A Strong Economy

Population and housing growth within Cork County has been, and continues to be, underpinned by strong local employment and economic performance. Cork County is the largest employment location outside of Dublin City and as a proportion of total population Cork County employment is similar to Dublin local authority areas.

Cork County income per person is the fifth highest in the State and commensurate with Dublin / GDA Local Authority areas.

The draft revision of the NPF, under Appendix 2: Population and Employment in Urban Settlements, Census of Population 2022, sets out the total jobs per urban area.

Of the towns in the Southern Region, c.25% of all urban employment is located within Cork County towns.

This NPF employment data also shows jobs:resident workers ratios. This data highlights the self-sustaining nature of many of the Cork County towns outside of Metropolitan Cork and the Greater Cork Ring.

Of all urban areas in the Southern Region, c. one third of Cork County towns are significantly above the median jobs:resident workers ratio and (with the exception of Carrigtwohill) those towns are all located in either North Cork or West Cork Strategic Planning Areas.

This Appendix also shows that all of the Greater Cork Ring Towns are performing close to the Southern Region Median for jobs:resident workers ratio.

Five of the six Greater Cork Ring Towns in Cork County are performing close to the Southern Region Median for jobs:resident workers ratio and three of the Towns have a positive ratio.

This Appendix also indicates that a number of County towns located within Metropolitan Cork have jobs:resident workers ratios below the Southern Region median, however it is critical to highlight that these settlements are part of the single jobs and housing market that exists within Metropolitan Cork.

While three of the four largest Cork County Metropolitan Towns (with a combined population in excess of 40,000) are below the Southern Region jobs:resident workers ratio median, critically they form part of the single jobs and housing market in Metropolitan Cork connected as part of the TOD / East Cork Commuter Rail line.

The pattern of urban growth targeted in the NPF is population and employment led, with the strategy recognising that enterprise development is drawn to urban locations by market forces such as agglomeration, migration and specialisation that depend on factors such as scale, accessibility, innovation supported by higher education institutions and quality of life.

As set out in section 3.5 above, it is demonstrated that employment growth is occurring in Cork County at sustainable locations - aligned with NPF policy priorities.

Cork County's robust settlement network is reflected and supported by its employment network, which includes the following Metropolitan Area locations (as recognised in the RSES / Cork MASP):

Table 3.1 – County Metropolitan Strategic & Specialist Employment Locations

Employment Location	Description	Infrastructure Priority
Cork Harbour Economy (CHE)	Nationally scaled entity within population in excess of 70,000 / employment in excess of 30,000 and includes five County Metropolitan Towns (Cobh, Carrigtwohill, Midleton, Passage West and Carrigaline), as well as four no. Strategic Employment Locations (Ringaskiddy, Little Island, Carrigtwohill and Whitegate/Aghada). CHE has the potential to at least double its economic output up to 2040	Holistic infrastructure for Metropolitan Area. Enhanced public transport connectivity - CMATS.
Ringaskiddy	Specialist employment area for life sciences, significant IDA enterprise assets and world leading marine research and innovation centres.	Holistic infrastructure for Metropolitan Area. Enhanced public transport connectivity - CMATS.
Marino Point	Opportunity to optimise the rail connection, deep water wharf facilities and utilities connections for port/marine industry related activity as an economic enabler for Cobh	Holistic infrastructure for Metropolitan Area. Rail Connectivity. R624 to Marino Point and Cobh.
Little Island	A Strategic Employment Area, with a business park, industries and access to a rail station and the N25.	Holistic infrastructure for Metropolitan Area. Enhanced public transport connectivity - CMATS.
Carrigtwohill	IDA business park and IDA Carrigtwohill East/Ballyadam Strategic site, strategic industrial lands accessible to rail corridor and N25.	Holistic infrastructure for Metropolitan Area. Enhanced public transport connectivity - CMATS. IDA Carrigtwohill East/Ballyadam lands requirement for access and rail connectivity.
Whitegate - Ireland's Energy Park	It is the location of the State's only oil refinery, three power stations, state of the art energy efficient technology and gas storage/carbon storage capability. Whitegate can deliver 25% of the country's energy needs. The refinery is considered a key national and regional asset in terms of developing bioenergy.	Holistic infrastructure for Metropolitan Area. Enhanced connectivity- R630.
Tier 1 Port of Cork	Support sustainable development and investment in the Port of Cork balanced with the protection of the natural environment and Cork Harbour SPA and promote its role as a Tier 1 International Port and driver for the metropolitan, regional and State economy.	The sustainable development of port infrastructure, including the M28, and facilities under the port's strategic development plans.

		Support investment in the sustainable renewal, development and key interventions that will drive forward the potential of key assets in the Cork Harbour area, including City Quays and Tivoli renewal, Marino Point, Cork Dockyard, Cobh, Ringaskiddy, Whitegate and Bantry.
--	--	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

The Cork Harbour Economy is a spatial and economic entity in excess of 70,000 population and in excess of 30,000 jobs, connected to a global economic network and with growth potential to in excess of €12bn GDP by 2040.

The NPF also recognises that new and unexpected opportunities for enterprise development are likely to arise for particular locational reasons and regional / local planning policies should be sufficiently agile to accommodate valid propositions for enterprise development based on strong locational drivers that may emerge.

In 2024, Cork County completed its *Renewable Energy Vision for Cork Harbour & Coastline*, arising from the emerging potential for offshore renewable energy.

The Cork Harbour and Coastline’s unique collection of strategic national assets – including its ports – make it the ideal location to be among the early movers of Ireland’s offshore wind industry and a primary location for a green industry hub with significant onshore opportunities.

Among Cork Harbour and Coastline’s strategic assets are:

- Abundant offshore wind resources, combined with a plan-led approach, has made the region attractive for early movers;
- Cork harbour presents an opportunity to integrate an offshore renewable supply chain with the region’s national scaled economy;
- Unique location with electrical interconnection, gas storage and fuel processing assets;
- One of Irelands leading economic regions with significant FDI and high value industry ready to switch to carbon free demand; and,
- Unique renewable ecosystem with multiple renewable companies and research bodies headquartered in the region.

The draft revision of the NPF needs to recognise the wider region in Cork. This area incorporating both the Metropolitan Area and the Greater Cork Ring Area represents a strong settlement network and employment market, containing c.80% of Cork population overall.

In addition to the Metropolitan Area Employment Locations, the Greater Cork Ring Area also provides for key population and employment growth locations.

Table 3.2 – Greater Cork Ring Employment

Sub County Economic Networks	Economic Sub Clusters	Principle Locations	Overall Strategy
Cork Ring Network	East Ring	Mallow*, Fermoy, Youghal	Maintain strong relationship with the Cork Metropolitan Area with potential for sustainable employment led growth to increase their scale.
	West Ring	Bandon, Kinsale, Macroom	These measures reduce commuting and promote sustainable travel options.

			<p>These towns also have a role in providing employment for their wider catchment.</p> <p>Prioritise investment in place-making and other infrastructure that supports quality of life to attract employment uses, affordable housing, educational capacity, sustainable travel, public realm, amenities, and cultural assets etc., to compliment other job creation initiatives.</p>
Mallow is also Key Town as identified in the RSES			

The NPF recognises that in rural areas creating the environment to support job creation will be a key enabler to rejuvenating rural towns and villages, sustaining vibrant rural communities and reversing population decline.

Table 3.3 – North Cork, West Cork & Rural Areas Employment

Sub County Economic Networks	Principle Locations	Overall Strategy
North Cork Agri Food Network	Mallow, Charleville, Mitchelstown, Fermoy	Continue to leverage significant potential from food and beverage and agri-tech assets.
West Cork Marine Network	Clonakilty*, Skibbereen, Bantry, Schull, Castletownbere	Network based on the N71 West Cork to South Kerry Corridor, leveraging significant marine economy, tourism, food and beverage, digital and other assets with strategic transport connections to the Cork Metropolitan Area.
Other Main Towns	Dunmanway, Millstreet, Kanturk, Newmarket, Monard	These towns have a role in providing employment for their wider catchment.
Key Villages and Other Settlements	All Key Villages	Support existing employment uses and the development of local catchment employment, particularly related to local assets, resources or opportunities.
Rural Areas		Support existing employment uses and resource driven sectors like agriculture, fishing, minerals, renewable energy, tourism, recreation etc. Support uses that cannot be accommodated within the towns / villages where the Planning Authority is satisfied that is required due to the unique specific locational or operational requirements of the use, subject to normal planning criteria
Clonakilty is also Key Town as identified in the RSES		

Set within the context of Cork County continuing to deliver population, housing and employment growth aligned with NPF priorities, Metropolitan Cork / Cork Harbour Economy, Greater Cork Ring, North Cork, West Cork and Rural Areas, can continue to deliver appropriately scaled economic opportunities to support the sustainable growth of the State’s second largest local authority.

3.10 Infrastructure and Programme Delivery

In 2023 Cork County Council's capital expenditure was €346m. The Council's adopted Capital Programme 2024-2026 is a proposed investment of over €1.5bn in the County over the next three years – to be delivered via a combination of Council Divisions, Municipal Districts, Directorates & Project Teams.

There are 25 *Project Teams* in Cork County Council directly engaged in various forms of Capital Project delivery, across a range of social, economic and environmental projects, consisting of hard and soft supports to remove barriers to sustainable growth and improvements to quality of life. Through close collaboration, these Project Teams ensure complementarity is achieved in the spending of public funds.

These *Project Teams* are involved in:

- Operations and Capital Projects – roads, public spaces, flood and coastal, rural water services, Municipal Districts
- Roads Design
- Sustainable Travel / Transport
- Housing
- Housing Infrastructure Implementation
- Climate Action
- Economic Development
- Rural Development
- Community Development
- Town Regeneration
- Active Land Management
- Waste
- Energy
- Tourism Development
- Arts and Culture
- Community Integration
- Public Lighting and Energy Efficiency

Investment in Urban and Rural Regeneration

While new initiatives such as **Town Centres First** and Project *Tosaigh*, are welcomed, there is an increased emphasis needed on the scale of regeneration to be undertaken in **the towns and villages across County Cork**. This will be critical to rejuvenate **our town and village** centres and generate private investment. **More** regeneration projects need to be planned and funded **across the County** to deliver compact liveable growth.

Cork County welcomes the initiative of the Department of Rural and Community Development (DCRD) to provide funding for **DCRD Capital Delivery Teams** within local authorities. Cork County currently delivers a range of DCRD funded programmes and enhanced support in this regard will facilitate a comprehensive programme of interventions to delivery NPF NSOs for rural locations.

Cork County Council works closely with all stakeholders and external support agencies to delivery infrastructure and programmes, having built significant capacity, expertise and experience in project delivery.

Recent significant projects delivered or ongoing - at various project stages, include (Cork County Council led or in supporting role):

- Active travel interventions set out in section 3.8 above
- Social and Affordable Housing as set out in section 3.6 above
- LIHAF schemes activation – Carrigaline and Midleton,
- Urban Expansion Area schemes activations – Midleton, Carrigaline, Carrigwohill
- Cork Commuter Rail Phase 1 – East and North Cork Rail Corridors
- Public realm projects – Carrigaline, Midleton, Clonakilty, Bandon, Skibbereen, Bantry, Fermoy, Macroom
- Dunkettle Interchange
- M28 to Ringaskiddy - preliminary design stage
- N/M20 Cork to Limerick Motorway Scheme - design and planning stage, for the refined route selected
- Carrigaline relief road
- Macroom by-pass road
- N22 Baile Bhuirne to Macroom Road Development
- N73 Clogher Cross to Waterdyke Realignment Scheme
- N72/N73 Mallow Relief Road - design and planning stage
- N72/R579 Ballymaquirk Junction Improvement Scheme
- N25 Carrigwohill – Midleton Upgrade Major Scheme - design and planning stage
- N25 Carrigwohill/Midleton Minor Scheme – ongoing, project focusing on the potential safety improvement measures and associated low-cost minor works interventions
- N71 Bandon Bypass Extension - public consultation took place
- N71 Newmills to Owenahincha Scheme - subject to TII approval
- N20 Charleville - ongoing
- Cork Lower Harbour Main Drainage Scheme
- Wastewater Capital Projects – Midleton, Mallow, Mitchelstown, Castletownbere, Whitegate, Castletownshend, Inchigeelagh, Ballymakeera, Coachford, Dripsey, Boherbue, Innishannon,
- Wastewater Network Upgrades – Mallow, Midleton
- Drinking Water Infrastructure – Clonakilty, Kanturk, Newmarket
- Small Towns and Villages growth Programme - Countywide
- URDF Projects – Mallow, Midleton, Carrigwohill, Carrigaline, Passage West, Cobh,
- RRDF Projects – Kinsale, Bandon, Fermoy, Charleville, Mitchelstown and Countywide.
- DCRD supported Countywide projects - Ceantair Laga Árd-Riachtanais, Community Recognition Fund, Local Improvement Schemes, LEADER, Outdoor Recreation Infrastructure Schemes,
- Town and Village Renewal schemes – Mitchelstown, Skibbereen, Bantry and Countywide
- Recreation and Amenity – Bantry, Skibbereen, Bandon, Mallow, Charleville, Schull, Clonakilty and Countywide.
- Tourism – Countywide.

The above high level overview of infrastructure and national programme delivery within Cork demonstrates that Cork County Council, supported by funding and infrastructure delivery agencies, is delivering targeted investments to support *Project Ireland 2040*.

Drainage and Flood Mitigation Infrastructure

Key drainage and flood relief infrastructure projects are currently at various stages of design, planning and delivery across Cork County. These schemes will be critical in adapting to climate change impacts and protecting key spatial and economic assets. Major flood relief schemes completed and in progress include the following:

Completed Schemes:

Bandon, Clonakilty, Douglas, Dunmanway, Fermoy North, Fermoy South, Mallow North, Mallow South & West, Skibbereen.

Schemes at Design and Development Stage:

Ballinhassig (€2M), Ballymakeera (€10M), Bantry (€15M), Midleton (€50M)

Funding and operational support to deliver the following CFRAM Tranche 2 Major Flood Relief Schemes will be required:

Kanturk, Rathcormac, Carrigaline, Innishannon, Ballingeary, Inchigealagh, Macroom, Castletownbere, Dunmanway, Schull, Castlemartyr, Youghal, Little Island, Cobh.

Other infrastructure that should be supported includes consideration of additional rail investment to deliver twin track between Mallow and Tralee and provision of a more direct rail route from Cork to Limerick city.

Appendix 4 sets out the 'Infrastructure Requirements for Key Growth Areas in Cork County & Additional Key Enablers.'

However, this overview is set within a broader, national investment programme and analysis of same demonstrates that:

**An overall increase in funding is required to deliver the growth targets set out in the NPF within the NPF timelines; and,
Funding allocated to key growth locations, such as Cork County, needs to be proportional to its growth targets with a significant national rebalancing of investment to support NPF Vision.**

For example, analysis of the *Project Ireland 2040 Capital Investment Tracker* shows that:

- proportional regional distribution of projected infrastructure investment does not reflect the growth targets of the NPF, with only 17% of overall planned investment allocated to the Southern Region. By comparison, the Dublin MASP accounts for 46%;
- for projects at pre-implementation phase, the Dublin Metropolitan Area accounts for 68% of total planned investment, compared with 19% for the Southern Region;
- comparing planned investment across the five metropolitan areas, 79% of funding is focused on the Dublin MASP - while the four regional MASPs are collectively targeted to deliver the same quantum of growth as the Dublin MASP;
- comparing per capita investment, planned investment in the Southern Region equates to €5,479 per capita - less than half that of the Eastern and Midlands Regions at €12,522;
- per capita investment for the Dublin Metropolitan Area (€19,011) is significantly higher than that of the Cork MASP area (€10,278); and,
- similar disparity of per capita investment is noted for the Metropolitan Area Transport Strategies for Cork and for the Greater Dublin Area Transport Strategy.

Notwithstanding the above investment profile, Cork County has put in place the local planning framework to give effect to Project Ireland 2040 / NPF and development trends set out in this submission demonstrate that growth is being achieved in alignment with the NPF priorities.

Cork County is directing housing and employment growth into sustainable centres of scale and in compact growth forms. The final stage in this process is activation – *see section 4.12 herein Learnings & Key Barriers to Delivery.*

3.11 Climate Transition

Cork County Council is the lead authority in the Climate Action Regional Office (CARO) which aims to drive climate action and build capacity and expertise within the local government sector. The Council has appointed a Climate Action Co-ordinator, Climate Action Officer and Community Climate Action Officer to implement climate change initiatives and programmes for the county.

Cork County Council has also adopted its Climate Action Plan (LACAP) 2024-2029 setting out the actions and objectives that Cork County Council will carry out across its own services to meet national emissions targets and to increase the resilience of its human and infrastructural assets against climate change impacts. This Plan also specifies how the local authority will work with its communities to advocate for change and with national government and state agencies to deliver climate action.

Cork County Council has identified Macroom as a decarbonising zone (DZ). Macroom will advance Cork County Council decarbonising schemes by engaging stakeholders and champion pilot projects to help reduce emissions and promote biodiversity in the area.

Cork County Council is also committed to supporting and implementing the Community Climate Action Programme (CCAP) funded by the Department of the Environment, Climate and Communications to address climate change at a local level. The programme provides targeted funding to eligible community organisations to deliver local climate action.

The Council's commitment to Climate Adaptation is also reflected in our Capital programme through investment in rural work hubs, improving living conditions in urban and rural areas, flood and coastal protection works for vulnerable communities, energy efficiency projects in Council owned facilities, protection of waterways and sustainable travel projects.

In addition to these initiatives, Cork County Council is having a significant and positive environmental impact through its delivery of NPF population, employment and housing growth targets and priorities.

3.12 Learnings & Key Barriers to Delivery

The population, employment and housing data presented above informs a number of learnings by, including the following:

Learnings:

- Population and employment growth trends demonstrate that Cork County is delivering NPF scaled growth;
- Analysis of growth locations indicate that new population and employment is occurring in sustainable patterns;
- Acknowledge that there are some brownfield sites outside the settlement network e.g. Bottlehill Site which can play an important role in providing employment and supporting indigenous industry.
- Residential units consents are being delivered to meet (and exceed) existing NPF housing targets;
- Growth projections indicate that Cork has the capacity to accommodate NPF scaled growth already allocated;
- Residential consents are delivering national policy in terms of increased density and sustainable / TOD growth locations;
- Activation of consented residential units is lagging significantly behind NPF housing targets;
- Housing viability/affordability results in the majority of first time buyers in Cork requiring either social housing or subsidised housing - mirroring the national position in this regard. The issue of viability / affordability can result in either a site not being activated or in a slower rate of development when activated; and,
- Advance, co-ordination infrastructure delivery is a key determinant in attracting and directing private investment - and by extension delivering sustainable growth (by volume and location) – see *Appendix 2 herein for Key Enablers*.

In Cork County, local policy is delivering NPF growth in terms of scale, location and form. Delivery of Key Enabling Infrastructure and support for Activation of consented, sustainable development is now critical.

4. Cork County in 2040

As set out above, population, employment and housing growth trends in Cork County are delivering NPF policy priorities and with particular focus on compact growth and transport orientated development, while supporting rural employment and populations. In collaboration with Cork City in the delivery of key city-focused growth locations and enablers, Cork County will continue to drive forward these growth trends and, through support in delivering key enablers and activation, will deliver under Project Ireland 2040 / NPF the following:

4.1 Spatial:

- A sustainable network of urban settlements consisting of:
 - A network of Compact / Walkable Metropolitan Towns and Metropolitan Strategic & Specialist Employment Locations connected via high-quality public transport / active travel, serving a single employment and housing market in Metropolitan Cork;
 - A network of Compact / Walkable Greater Cork Ring Towns, connected via enhanced public transport services (primarily bus) / active travel, with strong jobs:resident workers ratios, also supporting a significant rural hinterland;
 - New Public Transport Orientated Development locations (supported by active travel), such as Monard and Urban Expansion Areas identified within existing urban settlements;
- Compact / Walkable North Cork and West Cork County Towns, supported by rural transport and active travel investment, continuing to support c.20% of overall Cork population;
- Villages and Rural Area Networks, continuing to support appropriately scaled employment and population linked to rural enterprise.
- Relocation of industrial activities from Cork city docklands - via the delivery of the Great Island Connectivity Scheme, N25 upgrade and M28 road.

4.2 Transport:

- Strong focus on sustainable Transport Orientated Development;
- Growth in public transport use, with particular focus on investment in rail and bus transport in urban settlements within the Metropolitan and Greater Cork Ring Areas, with complementary investment in active travel infrastructure;
- Great Island Connectivity Scheme, N25 upgrade and M28 road to:
 - facilitate the activation of Cork Harbour assets as a first mover Ireland's offshore wind industry and a primary location for a green industry hub;
 - facilitate the relocation of industrial uses from Cork Docklands;
 - facilitate balanced regional development and enhanced regional integration via improved transport links to Waterford City and Suburbs;
- M20 Cork to Limerick to facilitate balanced regional development and enhanced regional integration via improved transport links to Limerick City and Suburbs
- Cork Northern Distributor and Link Roads to alleviate through-traffic in the city region;

4.3 Water Services:

- Work closely with ÚE to provide targeted water services infrastructure to support population, employment and housing delivery at key growth locations.

5. Conclusion

Cork City Council and Cork County Council welcome the publication of the first revision of the National Planning Framework (NPF) and strongly supports the aims and objectives of Project Ireland 2040 in terms of achieving balanced regional development.

Cork City Council and Cork County Council are committed to the continued delivery of sustainable and compact growth. As this submission highlights external barriers exist to increasing the scale, activation and long-term delivery of this growth. The NPF Revision should acknowledge these challenges in greater detail while highlighting the need for greater alignment between objectives for regional parity and the funding model to achieve this objective. Issues arising in relation to NPF implementation, investment in infrastructure, pent-up housing demand, climate transition, delivering regional parity and transport-oriented development (TOD) need to be addressed in the NPF Revision.

Cork is poised to deliver the wider ambitions of the NPF, with an emerging international city of scale at its heart that continues to grow as a competitive and sustainable city with a thriving harbour and strong metropolitan and county towns. The revisions suggested in this submission to NPF implementation are critical to support Cork's role as a regional and national driver to deliver the scale of regional, metropolitan and city growth targeted for 2040.

Cork City Council and Cork County Council look forward to continued and increased investment in Cork that delivers on the Project Ireland 2040 vision for more sustainable and balanced regional and national development.

Appendix 1 – Population Projections, The Flow of New Households and structural Housing Demand – ESRI July 2024

Population Projections

Appendix One of the ESRI Report sets out the population projections for the state and each county to 2027, 2032 and 2040.

Cork City and County are combined into a single figure in Table A.1, and it is unknown what assumptions have been made about the city / county split of population beyond 2022. It is therefore not possible to disaggregate these ESRI projections into a city / county figure.

In addition, these projections do not take account of the potential impact the development strategies of each local authority may have in terms of influencing the location or pace of future population growth.

The ESRI projection provides for a 2040 population for Cork (City and County) of 690,300. This is significantly lower than the projection provided in Appendix 1 of the RSES which provided for a “population potential” of 773,000 for Cork to 2040 (336,000 for Cork City and 437,000 for Cork County).

APPENDIX

TABLE A.1 POPULATION PROJECTIONS

	Population ('000) Baseline				Annual Growth in %, 2022–2040		
	2022	2027	2032	2040	Baseline	High Migration	Low Migration
State	5184.0	5532.1	5781.0	6106.1	1.0%	1.2%	0.8%
Carlow	62.4	65.2	66.7	68.8	0.6%	0.7%	0.5%
Cavan	82.3	86.5	88.8	91.4	0.7%	0.8%	0.5%
Clare	128.8	136.4	141.6	149.1	0.9%	1.0%	0.7%
Cork	588.1	626.4	653.6	690.3	1.0%	1.1%	0.8%
Donegal	168.2	177.0	181.9	188.1	0.7%	0.8%	0.5%
Dublin	1468.0	1596.3	1696.9	1814.6	1.2%	1.5%	1.0%

Appendix 1

Transitional Local Authority Population Projections To 2031

NPF Implementation Roadmap – July 2018 – DoHPLG.

	2016	2026	Uplift 2016 to 2026	2031	Uplift 2016 to 2031
Mid-West					
Limerick	195,000	229,000-235,500	34,000 - 40,500	246,000-256,500	51,000 - 61,000
Clare	119,000	129,500-131,500	10,500 - 12,500	134,000-137,000	15,000 - 18,000
Tipperary NR	71,000	77,500-79,000	6,500 - 8,000	80,500-82,000	9,500 - 11,000
Subtotal	385,000	436,000-446,000	51,000 - 61,000	460,500-475,500	75,500 - 90,500
South-East					
Waterford	116,000	132,000-135,000	16,000-19,000	137,000-144,000	21,000-28,000
Wexford	149,000	163,000-166,000	14,000-17,000	169,000-172,500	20,000-23,500
Kilkenny	99,000	108,000-110,000	9,000-11,000	112,000-114,500	13,000-15,500
Tipperary SR	88,500	96,000-98,000	7,500-9,500	99,500-102,000	11,000-13,500
Carlow	57,000	62,000-63,000	5,000-6,000	64,000-65,500	7,000-8,500
Subtotal	509,500	561,000-572,000	51,500-62,500	581,500-598,500	72,000-89,000
Overall Tipperary	159,500	173,500-177,000	14,000 - 17,500	180,000-184,000	20,500-24,500
South-West*					
Cork City	211,000	255,500-262,000	44,500-51,000	274,000-286,000	63,000-75,000
Cork County	332,000	367,500-377,000	35,500-45,000	382,000-398,000	50,000-66,000
Kerry	147,500	161,000-163,500	13,500-16,000	166,500-170,500	19,000-23,000
Subtotal	690,500	784,000-802,500	93,500-112,000	823,000-854,500	132,500-163,500
Overall Cork City and County	543,000	623,000-639,000	80,000-96,000	656,500-684,000	113,000-141,000
Total	1,585,000	1,781,000- 1,820,500	196,000-235,500	1,865,000- 1,928,500	280,000-343,500

Figures for Cork City and Cork County relate to the new revised administrative boundaries that came into effect in May 2019. The figures for 2026 are estimates. Core Strategies will address the alignment of the table in Section 5 of the Cork MASP with the new Cork City Council and Cork County Council boundaries. NPF projections indicate population potential of approximately 336,000 by 2040 for the revised Cork City boundary and approximately 437,000 by 2040 for the revised Cork County boundary.

Structural Housing Demand

Table A2 of the ESRI report outlines their estimate of structural housing demand for each Local Authority based on the different scenarios they have considered. These estimates do not factor in the impact of planning strategy on housing demand.

For the periods 2023- 2030 and 2030-2040, the table presents an average number based on all scenarios, and the lowest and highest outcome of the scenarios.

The ESRI structural demand projections in the ‘average’ and ‘lowest’ ranges, for the period 2023-2030, are lower than the current housing unit requirement in the CDP 2022-2028, by between 417 to 688 units p.a. The Housing Target in the 2022 CDP was prepared in accordance with the methodology set out in the ‘*Housing Supply Target Methodology for Development Planning Guidelines for Planning Authorities*’ published in December 2020. It is unclear if the methodology has been revised in preparing these new estimates.

In the ‘highest’ scenario, the ESRI structural demand projection for 2023-2030 comes in at 4,641 units, which is 872 units p.a. more than the housing requirement of the CDP 2022 (3,769units pa), but 429 units less than the annual unit capacity of the residential land supply¹ provided in the CDP of 5,070 units p.a.

Looking at structural demand averaged over the 17 year period 2023-2040, the figures come out at a per annum demand of 3,172 units (average across all scenarios), 2,539 units (lowest) and 4,265 units (highest).

The Cork County Council Planning Policy Unit has estimated the amount of unmet housing demand since 2011 as being just over 32,000 units. This unmet demand is calculated as the difference between the 3,500 units per annum required to meet the NPF target, and the number of units actually delivered every year. – see sample extract below. Over the 13 years, the average unmet demand is 2,477 pas.

Local Authority	2011	2012	2013		2020	2021	2022	2023	Total unmet demand end of 2023
Cork County Council New Dwellings Delivered	726	514	411		1,425	1,481	1,879	2,066	
Deficit of Units required to achieve NPF Target of 3,500 Units / Per Annum	2,774	2,986	3,089		2,075	2,019	1,823	1,703	32,204

¹ There is capacity for an estimated 30,708 units across lands in the plan that are zoned as part of the ‘existing built up area’ of settlements, lands zoned for ‘Residential’ or ‘Mixed Use Development’, lands zoned for ‘Residential Additional Provision’ and lands zoned for ‘Residential Further Additional Provision’. There is additional capacity of approximate 5,000 units on lands identified as a longer term ‘Residential Reserve.’

	3,500	3,500	3,500		3,500	3,500	3,500	3,500	
--	-------	-------	-------	--	-------	-------	-------	-------	--

ESRI Structural housing demand per annum							CDP 2022	CDP 2022
	Average across all assumptions		Lowest		Highest		Core Strategy Unit Requirement p.a.	Capacity of Land supply for residential – units p.a.
	2023-2030	2030-2040	2023-2030	2030-2040	2023-2030	2030-2040	22,611 units over 6 years.	30,418 units over 6 years .
Cork County	3,352	3,046	3,081	2,160	4,641	4,001	3,769 p.a.	5,070 p.a.
	7 years	10 yrs.	7 yrs.	10 yrs.	7 yrs.	10 yrs.		
Total	23,464	30,460	21,567	21,600	32,487	40,010		
Total 2023-2030	53,924		43,167		72,497			
Annual Average over 17 years	3,172 p.a.		2,539 p.a.		4,265 p.a.			

TABLE A.2 STRUCTURAL HOUSING DEMAND PROJECTIONS BY LOCAL AUTHORITY

	Average Across All Assumptions		Lowest		Highest	
	2023–2030	2030–2040	2023–2030	2030–2040	2023–2030	2030–2040
			low migr, current trend headship & 0.25% obs.		high migr, lower hh size headship & 0.5% obs.	
State	44,047	39,654	35,018	27,805	53,294	52,445
Carlow	432	364	343	252	523	484
Cavan	566	502	436	335	700	681
Clare	973	884	770	608	1,180	1,182
Cork City	1,651	1,501	920	1,064	1,386	1,971
Cork County	3,352	3,046	3,081	2,160	4,641	4,001
Dublin – Dublin City	6,526	5,444	5,054	3,656	8,042	7,403

The Draft Revised NPF published outlines the governments interpretation of the ESRI assumptions and projections in terms of population and any adjustments the government is making to the projections to take account of the spatial strategy of the NPF.

The current NPF, published in 2018, sets out population projections at a regional level. The Regional Spatial and Economic Strategy then allocates the regional population across the counties within the region. The Housing Supply Target Methodology Guidelines then set out the number of households that each local authority needs to plan to deliver in its CDP Core Strategy.

Previous NPF / RSES did not include any estimate of housing demand and a similar approach is followed this time which means that the housing demand estimates / the methodology for local authorities to use for calculating them will not become clear until much later in this process.

It is critically important that the Cork Local Authorities population and jobs growth targets to 2040 are at least maintained at current levels and should be increased given the level of success in delivering on those targets to date.

Appendix 2 - Summary of “Cork 2050”

The full Cork 2050 report and Executive Summary is available at:

[Cork 2050 - Delivering a Bright Future for Cork | Cork County Council \(corkcoco.ie\)](https://www.corkcoco.ie)

Introduction

This submission represents a continuation of the collaboration of the two Cork local authorities under the NPF process. In March 2017, as part of the initial NPF process the two authorities undertook the joint-initiative that is *Cork 2050*. The two authorities prepared a ‘whole of Cork’ submission to the NPF consultation process in 2017, following extensive consultation. It is an evidence-based strategic approach that builds on existing capacity to deliver on behalf of Cork, the Region and State.

The sustainable development principles incorporated into *Cork 2050* aligned with those of the NPF 2018 and continue to reflect the priorities set out in the draft revision of the NPF, as follows:

- *Spatial* - Maximise the potential of Cork’s urban and rural areas to be successful, sustainable places that support strong, vibrant and healthy communities;
- *Social - (People / Lifestyle)* - Facilitate the creation of a built environment with the associated requisite services that respond to the community’s needs and support its health, social and cultural well-being;
- *Economic* - Support an environment that enables the building of a strong, responsive and competitive economy that provides opportunity and access for all.
- *Environment* - Ensure the protection and resilience of Cork’s natural, built, historic and cultural environment. Pro-actively adapt to climate change and the transition to a low carbon society.
- *Mobility and Infrastructure* - Co-ordinate development requirements to identify infrastructural investment priorities that support sustainable patterns of growth and of community living.

2050 Ambition

Cork 2050 sets out the conditions to deliver an additional 120,000 new jobs and approximately 60% population growth (to 850,000 overall) and in this context is a roadmap for sustainable growth across all of Cork. The unique capacity of Metropolitan Cork, a plan-led, integrated economy and property market with a strong and vibrant Cork City at its heart, to drive escalated rates of economic and population growth to an international scale of over 500,000 persons, is central to the Cork proposition. However, *Cork 2050* also recognises the capacity and strategic importance of all the County, including rural communities.

The vision set out in *Cork 2050* was reflected in the final NPF 2018 Framework as well as the NPF Roadmap and Regional Spatial and Economic Strategy (RSES) that followed, in that the overall Cork population by 2040 was identified to increase by 230,000 to 772,868. The NPF 2018 also recognised Cork as the complementary location to Dublin with strong international connections and as the primary driver of economic and population growth in the Southern Region.

Cork 2050 offers a means of maximising opportunities and of responding to the challenges Ireland faces over the coming decades and which are currently being addressed under Project Ireland 2040. *Cork 2050* also presents a considered, evidence-based case for national level strategic policy support for the designation of Metropolitan Cork as the complementary location

to Dublin as an international driver of growth and the location best positioned to drive growth in the Region through collaborative leadership.

Uniquely the Cork proposition has the capacity to deliver effective regional development that will endure over the longer term and is a proposition that merits continued support by Government in terms of enabling policy and investment.

Cork 2050 is a meaningful statement of Cork's national and regional role in 2050. It is built on a platform of participation and engagement and offers a clear, consensual Vision for Cork's long-term development.

The Cork 'differential' is its available capacity at a critical time nationally - to relieve pressure on Dublin and to drive growth in the Southern Region. Cork is, today, the best location nationally capable of:

- *Achieving* a critical mass within the Metropolitan Area with in excess of 500,000 people by 2050;
- *Creating* up to 120,000 jobs to 2050;
- *Supporting* high capacity public transport corridors of a scale that underpins high levels of sustainable economic and population growth; and,
- *Facilitating* growth through significant existing infrastructure capacity, supplemented by committed upgrades and a programme of investment up to 2050 (including water, power, transport, ICT).

The unique Cork offer is further distinguished by a globally recognised quality of place and highly productive economy, supported by an adaptive learning environment capable of skilling and re-skilling as a platform for growth.

Assets & Capacities

Cork 2050 sets out Cork's physical and environmental capacity to accommodate significant economic and spatial change and its potential to play a leading role in delivering balanced national socio-economic growth for Ireland. Cork has significant comparative advantages in terms of key assets and capacity, differentiating itself in the national context and competing with similar Metropolitan areas in Europe and globally. *Cork 2050* emphasises the need to safeguard, invest in and leverage these assets that are critical for the future growth of Cork, the Southern Region and the State, including:

- *Critical Mass & Land* - Ireland's second most populous City and Metropolitan area;
- *Economic* - Highly productive economy;
- *Cork Airport* - Ireland's second largest airport;
- *Port of Cork* - Tier 1 Port;
- *City Centre Brownfield* - Significant redevelopment capacity;
- *Communications Infrastructure* - An important IP routing station and low latency connections;
- *Water Services* - Unrivalled water supply;
- *Transport* - Cork has defined corridors of transport demand;
- *Education* - Significant third level education accommodating;
- *Quality of Life, Place and Heritage* - An excellent quality of life, affordable living cost and offering choice;
- *Energy* - Unconstrained by energy supply, with considerable natural resources and significant renewable energy potential in terms of low carbon transition;

- *Healthcare* - Cork University Hospital is the largest university teaching hospital in Ireland and has a supra-regional catchment of 1.2 million people;
- *Maritime* - The second longest shoreline of any County in Ireland, the second largest natural harbour in the world and an extensive marine environment;
- *Arts & Culture* - The community employed in the arts and cultural sphere in Cork is double that of any other location outside of Dublin;

Cork 2050 Outcomes

Through the support of Project Ireland 2040, including the NPF and NDP (National Development Plan), *Cork 2050* identifies a range of outcomes that will be delivered, as follows:

- *Population Growth* - Building on the NPF's recognition of Cork's scale, the population will increase from 542,196 to c.846,423 persons with in excess of 60% of overall population living in the Metropolitan area in 2050;
- *Adaptable Economy* - A resilient and diverse economy creating on average over 3,500 jobs per year (120,000 additional jobs) building on comparative advantages and growing indigenous businesses;
- *Spatial Consolidation* - Increased need for efficiency in land use with between 3,500 and 4,500 people per sq.km in centres along corridors across Cork City and parts of the wider Metropolitan area;
- *Transportation* - Population growth, urbanisation and improved productivity will create strong demand for infrastructure at both the economic and social level. The implementation of Cork 2050 delivers a standout Benefit Cost Ratio (BCR) of 2.4 for transport investment;
- *Vibrant City Centre* - A highly accessible City Centre with brownfield sites regenerated through mixed-use, densified development (e.g. City Docks and Tivoli), continued investment in the public realm, and increased levels of accessibility in a unique waterfront setting;
- *Towns, Villages, Rural Areas and Islands* - Sustainable growth of communities as a key asset, supporting equality of opportunity through digital, social, cultural and economic connectivity;
- *Education* - The talent pool of human capital will be driven by second and third level education. Third level institutes will have significantly more overseas students in an internationalised education environment;
- *Healthcare* - Cork will have a state-of-the-art and expanded healthcare system and be recognised as a leader in healthcare innovation;
- *People First* - Through an attractive environment and access to services, people will continue to enjoy a high quality of life with improved health and well-being. Successful place-making and multi-cultural readiness will attract investment, talent and visitors. In the future, on average 4,000 people per annum will choose Cork as an inclusive place to live; and,
- *A Low Carbon Society* - A truly 'sustainable place', Cork will be at the forefront of the low carbon economy. CO2 emissions will be reduced by 500,000 tonnes through the delivery of public transport. The unique maritime features and green energy opportunities will see the advancement of the 'blue economy.'

Implementation Challenge

Cork 2050 also highlights the key challenge that will be faced in delivering its vision – and by extension, that of the NPF. *Cork 2050* states:

'The overarching challenge that Cork faces may be best articulated by the EU's 2013 ESPON Report, "Second Tier Cities and Territorial Development in Europe: Performance, Policies and Prospects" that identifies one of Cork's weaknesses as:

"Limited powers and resources at the disposal of local and regional governance actors."

It is acknowledged that the report focused on cities, but the key message applies to the development of all regions in Ireland, cities, metropolitan areas, towns and rural areas.

The above is relevant in the context of investment in the strategic infrastructure required to engineer its own destination. Whilst Cork 2050 sets out an ambitious strategic vision, it is ultimately the ability to implement the Strategy that will deliver growth. Within the above context, Cork faces a number of challenges including:

- *The delivery of public transport infrastructure*
- *Managing and building economic growth*
- *Delivery of compact growth patterns*
- *Proactively addressing emerging skills requirements*
- *Delivering quality houses in the right places*
- *Meeting commercial requirements*
- *Maintaining a high quality of life and place*
- *Environmental challenges*
- *Flood risk management*
- *Transitioning to a low carbon future*

Whilst this Strategy addresses the overarching strategic framework for Cork up to 2050 in a holistic manner, it is noted that further detailed Action Plans are required in response to certain challenges.'

The above challenge is mirrored in the OECD Report *'Towards Balanced Regional Attractiveness in Ireland: Enhancing the Delivery of the National Planning Framework'* (OECD 2023), which aims to support more balanced regional outcomes in Ireland. It states:

'Ireland is highly centralised and fast growing, creating coordination challenges in terms of delivering key investments and in key policy areas like transport, housing and education. Actors across levels of government recognise a need for a more coordinated approach to the delivery of the National Planning Framework, the principal spatial planning strategy of Project Ireland 2040, which includes also the National Development Plan (public investment).'

An expert Group was established in 2023 to provide a high-level overview of the NPF and identify matters to be considered in the first statutory revision of the NPF. The Group recommended that the NPF revision should build on NPF, 2018 and strengthen it in three broad respects – including regarding coordination and implementation:

- New targets should be more ambitious and more clearly defined;
- Roles of the bodies involved in its implementation should be clarified and strengthened (particularly in relation to the Metropolitan Area Strategic Plans) and mechanisms put in place for more detailed measurement and monitoring of its progress; and,

- Should be greater coordination at whole of government level across all infrastructure projects (including the NDP) and new efforts made to generate broader support for national spatial planning across all of society.

The implementation challenge highlighted by Cork 2050, the OECD and the Expert Group is reflected in Chapter 10: Implementing the National Planning Framework set out in the draft revision of the NPF. It states:

'... investment alone is not sufficient to successfully implement this Framework. It will also require more effective planning and co-ordination processes at national, regional and local levels, to ensure that the NPF shapes the policies and deliverable actions of Government Departments and Agencies, State bodies, local government and infrastructure providers, working in conjunction with communities, civic society, the private sector and neighbouring administrations.'

'The report [OECD] sees a strong role for regional and local government, highlighting the need for greater clarity in relation to their role in NPF implementation. It highlights opportunities for greater leadership and competences at these levels.'

Project Ireland 2040 / NPF is an evolving project and process. It is recognised by all actors – including the draft revision of the NPF - that policy and investment will need to be complemented by effective implementation in order to achieve Project Ireland 2040 goals. The draft revision of the NPF does not address governance challenges specifically and this is discussed in section 7 of this submission *Draft NPF Revision Key Observations & Recommendations*, however renewed focus on implementation is welcomed.

Appendix 3 - Feedback on Tracked Changes to the First Revision of the National Planning Framework

Item Number	First Revision National Planning Framework 2024 Page Ref / Section	Feedback / Comment from Cork County Council
1.0 The Vision		
General Comment: Conflict between other NPF policies and the NPF's Transport Orientated Development policy.		
1.	<p><u>Page 4: Section 1.2: Making the Vision a Reality</u> Strategy for managing growth The A major new policy emphasis on renewing and developing existing settlements established under the NPF 2018 will be required will be continued, rather than allowing the continual expansion and sprawl of cities and towns out into the countryside, at the expense of town centres and smaller villages. The target is for at least 40% of all new housing to be delivered within the existing built-up areas of cities, towns and villages on infill and/or brownfield sites. The rest of our homes will continue to be delivered at the edge of settlements and in rural areas.</p>	<p>The target is for at least 40% of all new housing to be delivered within the existing built-up areas of cities, towns and villages on infill and/or brownfield sites. The rest of our homes will continue to be delivered at the edge of settlements and in rural areas.</p>
2.	<p><u>Page 8: The report of an Expert Group that reviewed the NSS in 2014</u> While Dublin is at the forefront of international competition for mobile, inward investment, the potential of other locations must be harnessed.</p>	<p>There is little mention of international connectivity outside of Dublin. Expert group review in 2014 advised the inclusion of Cork Airport throughout the framework as it would be beneficial to harness the international growth potential. This was not done in the initial NPF or in this revision.</p>
3.	<p><u>Page 8/9: Section 1.4 What Happens if We Do Nothing:</u> '2023 Expert Group Review of 2018 NPF Strategy and Implementation: Overall, the Group recommended that the NPF revision could strengthen the Strategy in three broad respects: • Compact growth targets should be more ambitious and more clearly defined;</p>	<p>They do not seem to be more ambitious or more clearly defined in the Draft Review.</p> <p>Using the census definition for BUA to identify the built footprint is not fit for purpose with regard to land use planning a more suitable definition is required.</p>

Item Number	First Revision National Planning Framework 2024 Page Ref / Section	Feedback / Comment from Cork County Council
2.0 A New Way Forward		
<p>General Comment: Recognition for the East Cork rail corridor and need to prepare a framework plan to deliver NPF/RSES/Cork MASP ambitions, treat as a single entity, 4th largest settlement in the Country.</p> <p>Recognition for the Cork Harbour Economy and a major engine of growth both nationally and regionally.</p>		
4.	<p><u>Page 15: New text is included Under Section 2.1 Realising Ambition and Potential stating that:</u> “Given the variety of rural and urban communities throughout Ireland, each with capacity for growth and development that can significantly influence their surrounding areas, this Framework also targets as much potential growth to Ireland’s large and smaller towns, villages and rural areas as it does to the five cities”. (page 15) An element of future growth must be identified to take place in Ireland’s key regional centres and towns, to lead the development of their regions. The amount prioritised will be related to that targeted elsewhere and will have a knock-on impact, but this Framework also enables significant scope for ambition and balanced rural and urban development, supported by matching investment, throughout Ireland’s, towns, villages, and rural areas.</p>	<p>What is meant by balanced development and what does this mean for compact growth? These paragraphs in particular point to an inherent conflict. It will not be possible to achieve increased densities in accessible locations at an appropriate scale in line with TOD and also facilitate as much potential growth to Ireland’s large and smaller towns, villages and rural areas as it does to the five cities and facilitate up to 60% of all new housing on the edges of settlements and in rural areas.</p>
5.	<p><u>Page 16: Ireland’s Three Regions</u> Improving access between Cork, Limerick, Galway and Waterford.</p>	<p>This requires the M20 AND N25 Upgrade.</p> <p>There needs to be a strong emphasis put on connectivity between the 4 cities which form the counter balance to Dublin Region.</p>
6.	<p><u>Page 17: Ireland’s Rural Fabric</u> Reversing/Addressing town/village and rural population decline, particularly where it has occurred over time, by encouraging new roles and functions for buildings, streets and sites.</p>	<p>Clarification should be provided as to what is intended by “a properly planned local authority led approach”</p>

Item Number	First Revision National Planning Framework 2024 Page Ref / Section	Feedback / Comment from Cork County Council
	Implementing a properly planned local authority-led approach to identifying, meeting and managing the real housing needs arising in countryside areas.	
7.	<p><u>Page 17: Compact Growth</u> Supporting both urban regeneration and rural rejuvenation through a €3 Billion Regeneration and Development Fund and the establishment of a National Regeneration and Development Agency. The Urban Regeneration and Development Fund (URDF) and Rural Regeneration and Development Fund (RRDF) and other programmes targeted at addressing vacancy, dereliction and supporting brownfield development.</p>	<p>Emphasis still on URDF and RRDF to deliver change, Are they fit for purpose, having each LA bidding against each other to deliver agreed national policy does not make sense.</p> <p>A more targeted area based model of multi annual funding should be considered.</p>
8.	<p><u>Page 20: Section 2.4 Growing our Regions</u> As a result, there may be a requirement to plan for population growth that could exceed the overall 6.1m projection, in line with the high migration scenario provided in the ESRI's Report. However, this can only be undertaken and delivered in line with longer term strategic planning for Transport Orientated Development (TOD) in Ireland's five Cities. The purpose of this is to support the delivery of new sustainable communities at brownfield and greenfield locations along existing or planned high capacity public transport corridors within the metropolitan area, with a particular focus on TOD opportunities along high-capacity rail corridors. The allocation for these new sustainable communities provide greater flexibility to plan for future growth and investment.</p>	<p>There are significant TOD opportunities along the metropolitan east cork rail corridor, the realisation of which medium and longer term strategic planning for TOD needs to facilitate. More clarity is needed in relation to this, in particular given the potential for conflict between facilitating up to 60% of all new housing on the edges of settlements and in rural areas and delivering TOD.</p> <p>Reference is made to suitable scale of TOD. It may be helpful to give an approximate indication of what sort of scale is envisaged. The Draft Strategy, Moving Together – A Strategic Approach to the improved Efficiency of the Transport System in Ireland makes reference to studies undertaken regarding TOD potential in regional cities to determine the densities these areas can support and what</p>

Item Number	First Revision National Planning Framework 2024 Page Ref / Section	Feedback / Comment from Cork County Council
		development mix is most suitable. It would be helpful to have access to these studies. Paragraph seems positive with regard to NPF delivery and role of all stakeholders, but what might it actually mean in reality.
9.	<p>Page 20: Growing our Regions</p> <p>Given the key role of international migration in shaping population growth in Ireland, the ESRI have also modelled a higher international migration scenario with a projected population of 6.3 million people by 2030 (baseline + 200,000).</p>	Should 2030 read 2040? Given the likelihood of significant migration over the next 16 years it would be more prudent to plan for a population of 6.3m rather than 6.1m. A significant portion of the extra 200,000 should be directed to County Cork.
10.	<p>Page 21: Growing our Regions</p> <p>Census 2022 and other indicators highlight significant unmet demand for housing in Dublin and the Mid-Eastern Region in particular. This has the potential to undermine national competitiveness and social cohesion. As a result, there may be a requirement to plan for population growth that could exceed the overall 6.1m projection, in line with the high migration scenario provided in the ESRI's Report....</p>	It would be helpful if more detail was given in relation to the 'other indicators'. It is great that the ESRI have recognised the impact of international migration however, rather than state that 'there may be a requirement' - it might be more useful to state that should this be required that it would be facilitated in the next iteration of the NPF – or else make provision for it now. It is left very open so as to make it meaningless. Opportunity to get additional growth for the east cork corridor or at least a more flexible approach, TOD only in East Cork Corridor and Mallow? Maybe Buttevant/Charleville.
11.	<p>Page 22: National Planning Objective 3</p> <p>"Southern Region: approximately 330,000 340,000-380,000, additional people over 2022 levels (c. 450420,000 additional people over 2016-2040) i.e. a population of almost just over 2 million. "</p>	Only a small increase of 30,000 across region and less than the lower end of the current range 340,000-380,000, however it is over a shorter time scale.

Item Number	First Revision National Planning Framework 2024 Page Ref / Section	Feedback / Comment from Cork County Council
		This objective relates to all ‘built up areas’ as defined by CSO’. In Cork County alone there are 112 built up areas. Nationally there 867 built up areas. Allowing development to occur across a large number of these settlements would undermine NPO 93 and attempts to deliver Transport Orientated Development, particularly as up to 60% of such development would be outside of the built-up footprint of existing settlements
12.	<p><u>Page 22: National Policy Objective 1c (deleted) and Table 2.1</u></p> <p>In similar terms, applying the ESRI projections for around two thirds of a million additional jobs in Ireland by 2040 and seeking a shift in the pattern away from current trends, means planning for a pattern of:</p> <p>National Policy Objective 1c</p> <ul style="list-style-type: none"> ○ Eastern and Midland Region: around 320,000-265,000 additional people in employment i.e. 1.34-1.45 million in total; ○ Northern and Western Region: around 115,000-95,000 additional people in employment i.e. 450,000 (0.45m)-485,000 in total; ○ Southern Region: around 225,000-190,000 additional people in employment i.e. 880,000 (0.875m)-940,000 in total. 	Why are the employment figures deleted – especially given that employment growth is still mentioned in NPO 2 (previous NPO 1a)
13.	<p><u>Middle Page 25: 2.6 Securing Compact and Sustainable Growth</u></p> <p>In order to understand compact growth trends, development must be monitored across cities and towns in a consistent way. A new approach to monitoring urban growth will be developed, focussing on the built-up footprint of existing settlements comprising areas that are subject to</p>	CCC support the development of a consistent approach to monitoring of compact growth and suggest that LAs be given the opportunity to contribute to the development of the tool/ methodology or development of the tool so as to ensure its practical application based on a

Item Number	First Revision National Planning Framework 2024 Page Ref / Section	Feedback / Comment from Cork County Council
	<p>existing urban land uses and the additional 'land take' associated with development outside of the built-up footprint.</p> <p>A tool is being developed to track and compare urban development trends across the main urban settlements.</p>	<p>variety of urban forms and the availability of data.</p>
14.	<p><u>Page 25: National Policy Objective 7</u> <i>Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements and ensure compact and sequential patterns of growth.</i></p>	<p>It is also noteworthy that the footnote associated with NPO 7 clarifies that 'This objective relates to all 'built up areas' as defined by CSO'. In Cork County alone there are 112 built up areas. Nationally there are 867 built up areas. Allowing any significant level of development to occur across many of these settlements would undermine NPO 93 and any attempts to deliver Transport Orientated Development.</p>
15.	<p><u>Page 26: National Policy Objective 10:</u> <i>Deliver Transport Orientated Development (TOD) at scale at suitable locations, served by high-capacity public transport and located within or adjacent to the built up area of the five cities or a metropolitan town.</i></p>	<p><u>See Comments in relation to Page 20: Section 2.4 Growing our Regions (Item 8)</u></p>
16	<p><u>Page 27: Translating the NPF to City and County Levels</u> <i>...allowing NPF growth objectives to be incorporated into city and county development plans as they are reviewed.</i></p>	<p>Regional and local level mentioned first to then following that - the incorporation into the Regional Plans and then the city and county dev plans? (No mention in the second part of the sentence to the regional plans?)</p>
17.	<p><u>Page 27: National Policy Objective 11:</u> <i>Planned growth at a settlement level shall be determined at development plan-making stage and addressed within the objectives of the plan. The consideration of individual development proposals on zoned and serviced development land subject of consenting processes under the Planning and Development Act shall have regard to a broader set of considerations</i></p>	<p>What is the purpose of the second part of this NPO surely ever before lands are zoned the 'broader set of considerations including the receiving capacity of the environment' is taken into consideration – it doesn't make sense to have this provision in for the consenting processes following the zoning of land.</p>

Item Number	First Revision National Planning Framework 2024 Page Ref / Section	Feedback / Comment from Cork County Council
	<i>beyond the targets including, in particular, the receiving capacity of the environment.</i>	
3.0 Effective Regional Development		
18.	<p>Page 43: Section 3.4 Southern Region</p> <p>The three city regions, both individually and collectively are a key asset of the region and will play a major role in both driving and accommodating a significant proportion of the additional 380,000 300,000 people anticipated in the overall region between 2022 and by 2040, taking its population to almost 2 million people.</p>	Is it 300,000 or 330,000 people? (see table 2.1) It would bring the population to over 2 million people.
19.	<p>Page 44: Southern Region-Southwest</p> <p>While employment, infrastructure and strengthening of small towns and rural communities are priorities throughout this regional area, within the CASP Study Area, there will also be a focus on more balanced and compact, connected growth. This means that housing development should be based on centres of employment and employment growth, higher densities, access to amenities and sustainable transport modes, in order to avoid long-distance commuting patterns and quality of life impacts.</p>	It will be very challenging to achieve both these requirements at the same time.
20.	<p>Page 45: Key future planning and development and place-making policy</p> <p>This requires an ambitious vision for Cork, at the heart of which must be an internationally competitive, sustainable urban environment. In the future, Cork needs to accommodate a greater proportion of the growth it generates within its metropolitan boundaries, while offering improved housing choice, transport mobility and quality of life. This means providing a range of critical enabling infrastructure to deliver large-scale urban growth for housing, transport, amenities and energy systems in a best practice European context.</p>	There is reference to Cork being internationally competitive, but not much to support this. Does 'Cork' need to accommodate a greater proportion of the growth Within the overall MASP boundary (jointly with the City) or within each discrete settlement within the overall MASP area or within the City boundary?

Item Number	First Revision National Planning Framework 2024 Page Ref / Section	Feedback / Comment from Cork County Council
21.	<p><u>Page 46: Cork City and Metropolitan Area</u> 'One of the greatest challenges in achieving significant growth that will move the Cork metropolitan region to the next level is addressing the long-term decline of the City's urban population.</p>	<p>Is this the Metropolitan area as a whole and aside from the regen areas in the city it is also clear that the county has a big part to play in the provision of greenfield TOD. But why is the Metropolitan Region deleted from the next sentence? No mention of the County's Metropolitan Towns strong performance in 2022 Census. They have a key role to play in the delivery of MASP Targets.</p>
22.	<p><u>Page 47: Key future growth enablers for Cork include:</u> Delivering Bus Connects Cork and the Cork Area Commuter Rail Programme. Progressing the sustainable development of new brownfield and greenfield areas for housing</p>	<p>Should it read brownfield and new greenfield?</p>
23.	<p><u>Page 47: Key future growth enablers for Cork include:</u> especially those on public transport corridors, such as Monard;</p>	<p>Monard is a key enabler to deliver the population growth targets and deliver TOD. Suggest a reword to suggest its longer-term potential in the context of the Planning and Development Bill provisions for SDZs rather than just delete? Makes it difficult for the RSES and CDP if no strategic guidance.</p>

4.0 Making Stronger Urban Places

General Comment: *It is important that references to East Cork Corridor and the Cork Harbour Economy are included here.*

Enablers
*Should include in particular the N25 upgrade and also upgrading of the Midleton Whitegate road to National Road Status, delivery of the Port of Cork expansion, linked to M28. Ensure Port ready to take advantage of opportunities presented by ORE.
 Need to set out in detail the Cork settlement network of 172 settlements. Where are the enablers for the development of Metropolitan, Ring and County Towns even at a high level.*

Item Number	First Revision National Planning Framework 2024 Page Ref / Section	Feedback / Comment from Cork County Council
24.	<p><u>Page 52: National Policy Objective 12</u> <i>Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.</i></p>	<p>Climate actions will have a significant impact on the shape and design of our urban areas (SuDS, enhanced tree cover, EV charging, active travel routes etc.) so suggest the inclusion of climate resilience in this objective.</p>
25.	<p><u>Page 54: 4.2 Ireland's Urban Structure</u> The Central Statistics Office (CSO) defines a settlement of more than 1,500 people as 'urban'. The agreed EU/OECD definition of a 'city' is a settlement around a core centre with a population of more than at least 50,000 people. There were 41 49 Towns with a population of at least 10,000 or more people (<i>an increase of 8 or 16% since the 2016 Census</i>), home to 16 18% of Ireland's population. -Ireland's urban population is larger than ever before and for the first time, just more than half of the population, or nearly 2.4 7 million people, now live in cities or large towns of at least 10,000 people.</p>	<p>Need for more consistency with defining urban areas.</p> <p>5 of these are in Cork County. Data for all urban settlements is included as part of Appendix 2.</p> <p>Urban here is considered in scale of 10,000 instead of 1,500- consistency on defining what is meant by urban.</p>
26.	<p><u>Page 56: Section 4.3 Planning for Ireland's Urban Growth</u> The unique and complex nature of Ireland's urban structure suggests the need for a range of complementary strategies in the context of planning for future growth. In order to achieve more balanced and sustainable development, some settlements will need to attract increased population, whereas others will need more jobs, amenities or better transport links.</p>	<p>Acknowledgement that the unique and complex nature of Ireland's urban structure suggests the need for a range of complementary strategies in the context of planning for future growth. In order to achieve more balanced and sustainable development, some settlements will need to attract increased population, whereas others will need more jobs, amenities or better transport links.</p>
27.	<p><u>Page 56: National Policy Objective 15</u> <i>Apply a tailored approach to urban development, that will be linked to the Rural and Urban Regeneration and Development Funds, with a particular focus on:</i></p>	<p>What are considered the "smaller urban areas"? Is it those with a population of 1,500-10,000?</p>

Item Number	First Revision National Planning Framework 2024 Page Ref / Section	Feedback / Comment from Cork County Council																																														
	Reversing the stagnation or decline of many smaller urban centres , by identifying and establishing new roles and functions and enhancement of local infrastructure and amenities.																																															
28.	<p><u>Page 58: Table 4.1: Ireland 2040: Targeted Pattern of City Population Growth</u></p> <p>Table 4.1 Ireland 2040: Targeted Pattern of City Population Growth</p> <table border="1" data-bbox="613 512 1135 756"> <thead> <tr> <th rowspan="2">City</th> <th rowspan="2">Population 2016-2022</th> <th colspan="2">2018 NPF</th> <th colspan="2">Population Growth to 2040¹</th> <th rowspan="2">Minimum Target Population 2040</th> </tr> <tr> <th>% Range 2016-2040</th> <th>% Range 2022-2040</th> <th>People</th> <th>People</th> </tr> </thead> <tbody> <tr> <td>Dublin - City and Suburbs</td> <td>1,283,000 1,283,000</td> <td>20-25%</td> <td>20-25%</td> <td>296,000 386,000</td> <td>1,409,000</td> <td>1,560,000</td> </tr> <tr> <td>Cork - City and Suburbs</td> <td>306,000 273,000</td> <td>30-60%</td> <td>40%</td> <td>106,000 135,000</td> <td>314,000</td> <td>320,000</td> </tr> <tr> <td>Emerick - City and Suburbs</td> <td>64,000 102,000</td> <td>50-60%</td> <td>40%</td> <td>17,000 44,000</td> <td>81,000</td> <td>150,000</td> </tr> <tr> <td>Galway - City and Suburbs</td> <td>80,000 96,000</td> <td>50-60%</td> <td>40%</td> <td>40,000 48,000</td> <td>120,000</td> <td>122,000</td> </tr> <tr> <td>Waterford - City and Suburbs</td> <td>64,000 60,000</td> <td>50-60%</td> <td>40%</td> <td>18,000 23,000</td> <td>82,000</td> <td>88,000</td> </tr> </tbody> </table>	City	Population 2016-2022	2018 NPF		Population Growth to 2040 ¹		Minimum Target Population 2040	% Range 2016-2040	% Range 2022-2040	People	People	Dublin - City and Suburbs	1,283,000 1,283,000	20-25%	20-25%	296,000 386,000	1,409,000	1,560,000	Cork - City and Suburbs	306,000 273,000	30-60%	40%	106,000 135,000	314,000	320,000	Emerick - City and Suburbs	64,000 102,000	50-60%	40%	17,000 44,000	81,000	150,000	Galway - City and Suburbs	80,000 96,000	50-60%	40%	40,000 48,000	120,000	122,000	Waterford - City and Suburbs	64,000 60,000	50-60%	40%	18,000 23,000	82,000	88,000	Cork City and Suburbs - does the % range mean it is 96,000 plus up to 40% i.e. an additional 38,400?
City	Population 2016-2022			2018 NPF		Population Growth to 2040 ¹			Minimum Target Population 2040																																							
		% Range 2016-2040	% Range 2022-2040	People	People																																											
Dublin - City and Suburbs	1,283,000 1,283,000	20-25%	20-25%	296,000 386,000	1,409,000	1,560,000																																										
Cork - City and Suburbs	306,000 273,000	30-60%	40%	106,000 135,000	314,000	320,000																																										
Emerick - City and Suburbs	64,000 102,000	50-60%	40%	17,000 44,000	81,000	150,000																																										
Galway - City and Suburbs	80,000 96,000	50-60%	40%	40,000 48,000	120,000	122,000																																										
Waterford - City and Suburbs	64,000 60,000	50-60%	40%	18,000 23,000	82,000	88,000																																										
29.	<u>Page 60: 4.4 Planning for Urban Employment Growth</u>	There is a strong link between urban growth, employment, and appropriate locations for enterprises to be based that are easily accessible by public transport with TOD potential available. Should there be references here to include Cork’s international accessibility if it is to reach the anticipated level of growth projected?																																														
30.	<u>Page 62: NPO 20</u> <i>In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.</i>	What is meant by ‘encourage more people’? Does it mean encourage more people to live within existing settlements or to work or visit? Clearer wording here would be helpful.																																														

Item Number	First Revision National Planning Framework 2024 Page Ref / Section	Feedback / Comment from Cork County Council
5.0 Planning for Diverse Rural Places		
31.	<p><u>Page 75: Planning for Diverse Rural Places</u> At a local level, the core strategy of county development plans accounts for the demand for single housing in the countryside. This is related to the local authority’s overall Housing Need Demand Assessment (HNDA) that is required to be undertaken. in future planning. Quantifying the need for single housing on an evidence basis will assists in supporting the preparation of a comprehensive housing strategy and associated land use policies.</p>	<p>What is the real demand? And what might it be in the future if rural housing policies are changed?</p>
32.	<p><u>Page 69: Section 5.3 Planning for the Future Growth and Development of Rural Areas</u></p>	<p>As part of the Urban discussion there is also a focus on what it rural, urban and the areas in between? Important in the context of defining urban areas and the need and role of the different types of urban areas. In line with the URDF and RRDF settlements under 10,000 can qualify for both- consistency of approach across both documents. Town Centre First- ‘Smaller Towns’ (Page 70) smaller towns- considered rural or urban? what population are smaller towns? Case Study is Boyle, Co. Roscommon- pop of 2915. These towns generally have a population more than 1,500 and are considered urban using the CSO definition.</p>
33.	<p><u>Page 81: National Policy Objective 35</u> Continue to Facilitate facilitate tourism development and in particular the Strategy for the Future Development of National and Regional Greenways Greenways, and a Blueways and Peatways Strategy, which</p>	<p>National and Regional Greenways should also identify and maximise opportunities for connectivity at a local level</p>

Item Number	First Revision National Planning Framework 2024 Page Ref / Section	Feedback / Comment from Cork County Council
	<p>prioritises projects on the basis of <i>their environmental sustainability, achieving maximum impact and connectivity at national and regional level while ensuring their development is compliant with the National Biodiversity Action Plan, the national climate change objective and requirements for environmental assessments.</i></p>	
34.	<p>Page 95: National Policy Objective 44 <i>Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.</i></p>	<p>Given the climate emergency the bar for sustainable development is significantly higher than in 2018. New homes should be in locations that offer a combination of public transport and active travel modes. Other NPOs may conflict with this, such as NPO 7 (not all 847 built up areas will have the capacity to support sustainable development) and NPO 29 (the objective to ‘... facilitate the provision of single housing in the countryside based on siting and design criteria for rural housing in statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements’ may require more careful management/wording to minimise undermining of NPO 44.</p>
<h2>6.0 People, Homes and Communities</h2>		
35.	<p>Page 102: Changing Family Size Deleted section on household size: Currently, 7 out of 10 households in the State consist of three people or less, with an average household size of 2.745 people. This is expected to decline to around 2.5 people per household by 2040.</p>	<p>These sentences have been replaced with a commentary on the existing (2022 Census) household size. Would it be very useful to include reference to where potentially household size might go to in 2040 (The ESRI give this some consideration in their report)²</p>

² From page 20 of the ESRI’s July 2024 Paper on Population projections, the flow of new households and structural housing demand. ‘This assumption does however imply that household size in Ireland will fall from **2.8 to 2.6** over time between **2022 and 2040**, with the fall purely driven by changes in demographic structure.’

Item Number	First Revision National Planning Framework 2024 Page Ref / Section	Feedback / Comment from Cork County Council
	<p>Household sizes in urban areas tend to be smaller than in the suburbs or rural parts of the country. In Dublin city, one, two and three person households comprise 80 percent of all households.</p>	<p>and we have used the 2.5 AHH figure as a guide for estimating future population for engagement with other state stakeholders including the NTA and Uisce Eireann. It would be very helpful if they could give even a range of where household size (or headship rates) might be in 2030 and 2040.</p>
36.	<p>Page 103: National Policy Objective 47 New statutory guidelines, supported by wider methodologies and data sources , will be put in place under Section 28 of the Planning and Development Act to improve the evidence base, effectiveness and consistency of the planning process for housing provision at regional, metropolitan and local authority levels. This will include be supported by the provision of standardised requirements by regulation for the recording of planning and housing data by the local authorities in order to provide a consistent and robust evidence base for housing policy formulation. <i>Continue to develop methodologies and data sources , will be put in place under Section 28 of the Planning and Development Act to improve the evidence base, effectiveness and consistency of the planning process for housing provision at regional, metropolitan and local authority levels. This will include be supported by the provision of standardised requirements by regulation for the recording of planning and housing data by the local authorities in order to provide a consistent and robust evidence base for housing policy formulation.</i></p>	<p>CCC recognise the benefit of timely and accurate housing and planning information and request early engagement on the development of the standardised reporting requirements for planning and housing, particularly in the context of the Council’s move to a new file management system, APAS, soon to be rolled out in the County but also across a significant number of other Local Authorities across the country.</p>
37.	<p>Page 111: National Policy Objective 51 <i>Ensure that the strategic development requirements of Tier 1 and Tier 2 Ports, ports of regional significance, State Fishing Harbours and smaller harbours are addressed as part of Regional Spatial and Economic Strategies, and metropolitan area and city/county development plans and plans at local level to ensure the effective growth and sustainable development of the city regions and regional and rural areas, including, where appropriate, infrastructure to effectively support the development and maintenance of off-shore renewable electricity generating developments.</i></p>	<p>Great Island Connectivity Scheme crucial to facilitate possible offshore renewable energy hub at Rushbrooke, Cobh.</p>

Item Number	First Revision National Planning Framework 2024 Page Ref / Section	Feedback / Comment from Cork County Council
38.	<p><u>Page 111: National Policy Objective 52</u> <i>Support the sustainable delivery of port and harbour infrastructure to facilitate the development, maintenance and operation of off-shore renewable electricity generating developments.</i></p>	<p>Road infrastructure supporting port facilitation of the development, maintenance and operation of off-shore renewable electricity generating developments is also crucial.</p>
<h2>7.0 Realising our Island and Marine Potential</h2>		
<p>General Comment: <i>The SEA of the draft plan recommends the inclusion of a new NPO supporting alignment between terrestrial and marine planning. Is there a benefit in including a supporting reference to supporting innovation in aquaculture?</i></p> <p><i>Given this strategic focus on the Tier 1 ports, noting the location the Port of Cork, planned connectivity, the extent of deepwater berthing facilities which can be provided and its freight handling facilities (for both unitised and bulk freight), it would be important to include a reference to the role which the port provides to the southern and southwestern region. Also highlight that the Port of Cork is the only Tier 1 port on the south or west coasts which handles unitised freight (Shannon Foynes does not provide any unitised freight services and, according to the current Masterplan, does not have any plans for such services in the future).</i></p>		
<h2>8.0 Working with Our Neighbours</h2>		
39.	<p><u>Page 116: 8.1 Ireland and the European Union</u> <i>Ireland’s direct links with other EU Member States by both air and sea and subsea energy connections are increasingly important, given their advantages in terms of resilience and ease of movement across internal borders. As a result, ports and airports facilitating faster transit times between Ireland and the EU need to be effectively connected into our land-based transport systems.</i></p>	<p>The Celtic Interconnector Project is an excellent ‘live’ example of this and should be referenced in a case study. https://www.eirgrid.ie/celticinterconnector</p>
40.	<p><u>Page 128: 8.5 Managing our Shared Environmental Responsibly</u></p>	<p>See comments regarding the FR NPF SEA in this document (next table).</p>
<h2>9.0 Realising our Sustainable Future Climate Transition and Our Environment</h2>		

Item Number	First Revision National Planning Framework 2024 Page Ref / Section	Feedback / Comment from Cork County Council
41.	<u>Page 144: Section 9.2 Protecting Conserving and Enhancing our Natural Capital - Water Resource management and Flooding</u>	New NPOs 79 and 80 and amended NPO 78 relating to nature-based solutions (see next section regarding the NPOs). This section and NPOs could insert more text to include for the Rainwater Management Plans and reference the National Guidance Document. <i>Nature Based Management of Urban Rainwater and Urban Surface Water Discharges - A National Strategy.</i>
42.	<u>Page 146: Nature Based Solutions</u>	This section and associated NPO should include reference to 'Nature Based Management of Urban Rainwater and Urban Surface Water Discharges – A National Strategy' and the need for the roll out of Rainwater Management Plans which is an objective of the Strategy. Nature Based Solutions need to be front and centre in dealing with surface water, also need to move quickly to addressing issues at a catchment level.
43.	<u>Page 147: National Policy Objective 80</u> <i>Support the retrofitting of existing environments to cater for surface water run-off through the use of nature-based solutions, including the implementation by Uisce Éireann of Integrated Drainage Plans on a prioritised settlement basis.</i>	The first mention of Integrated Drainage Plans is in NPO 80. Suggest there should be text included to provide the rationale and context for the objective and including reference to the re-cast of the Urban Wastewater Directive.
44.	<u>Page 150: National Policy Objective 85</u> <i>In line with the objectives of the National Biodiversity Action Plan, planning authorities should seek to address no net loss of biodiversity within their plan making functions</i>	Objective for no net loss should be more ambitious and require a net gain given the declared national biodiversity crisis and the

Item Number	First Revision National Planning Framework 2024 Page Ref / Section	Feedback / Comment from Cork County Council
		emphasis on restoration of biodiversity in the NBAP.
45.	<u>Page 152: Section 9.4</u>	Given the dependency of plan-making and decision-making on up-to-date water services information, consider the introduction of appropriate structures and digital platforms/ infrastructure to allow for information sharing between Local Authorities and Uisce Éireann beyond the annual capacity registers, that facilitates dynamic design making in real time and to ensure consistency of advice provided to developers etc.

10.0 Implementing the National Planning Framework

General Comment: A lot of positive talk about structures but no real detail, references to OECD report but unclear what exactly is proposed. Goal posts moved to 2030 not 2031 and 2040 significant proportion of growth targeted (front loaded) in the 2022 to 2030 period. See 10.1 below. Phasing for cities dealt with in the MASP.

- Clarity is needed as to whether TOD applies to the whole Cork MASP area.
- Clarity is needed regarding the scale of individual TODs envisaged.
- There is concern regarding possible conflicts between NPOs 10 and 93 and NPOs 4 (NPO 4 implies that 50% of future growth will be outside the existing five cities and their suburbs) and 7 (NPO 7 implies that 60% of all new homes nationally will be delivered outside the built-up footprint of existing settlements and that where 40% of all new homes nationally are delivered within the built up footprint of existing settlements this will be divided across 867 settlements nationally).
- New approach to deliver TOD type development in smaller settlements is welcome but there is conflict between this and NPO 29
- There is potential conflict between NPO 44 and NPOs 4, 7 and 29.
- There is potential conflict between text associated with NPO 94, 'while locations outside of the metropolitan areas may not be suitable for large scale TOD the principles of TOD can be applied at local level' and NPO 29.

Item Number	First Revision National Planning Framework 2024 Page Ref / Section	Feedback / Comment from Cork County Council
	<ul style="list-style-type: none"> • Identification of the following as key future growth enablers is welcome and is in alignment with CDP policy: <ul style="list-style-type: none"> ○ Delivery of BusConnects Cork and the Cork Area Commuter Rail Programme (new). Progressing the sustainable development of new brownfield and greenfield areas for housing along existing and planned high-capacity public transport corridors with a particular focus on large-scale Transport Orientated Development (TOD) opportunities within the metropolitan area, especially those on public transport corridors, such as Monard (note deletion of reference to Monard – no reference to Monard in Draft Review). • Critical role of ports in facilitating offshore renewable energy is important (new). An increased emphasis on the need for adequate road (and rail freight) infrastructure serving ports is required. • Clarity is required on whether the extension of statutory arrangements that are already in place for transport planning in the GDA to all of Ireland’s cities will include the MASP area of Cork that is within Cork County (as per the Cork Metropolitan Area Transport Strategy). • While the draft NPF review makes reference to Moving Together – A Strategic Approach to the Improve Efficiency of the Transport System in Ireland , it does not seem to reflect the strategy’s measures focused on intensification and diversification which highlight that, rather than only equating densification with increases in building height, measures can look to intensify different activities in existing spaces. • The Draft Review refers to National and Regional Greenways achieving maximum impact and connectivity at national and regional level (NPO 35) (inclusion of greenways here is new). There may also however be opportunity for national and regional greenways to identify and maximise opportunities for connectivity at a local level. 	
46.	<p><u>Page 158: Section 10.2 The Planning System: Integrating Spatial and Transport Planning</u></p> <p>It is proposed to extend the statutory arrangements that are already in place for transport planning in the GDA to all of Ireland’s cities, thereby strengthening the levels of integration between spatial planning and transport planning across the country, to the benefit of the economy and society.</p>	It would be helpful to clarify if this will extend to all the Cork MASP region or a wider area.
47.	<p><u>Page 163: National Policy Objective 94</u></p> <p>Statutory arrangements between spatial and transport planning in the Greater Dublin Area will be extended to other cities.</p> <p>The Department of Housing, Local Government and Heritage and the Department of Transport are working with the LDA, NTA, local and</p>	In relation to NPO 94 it is stated that while locations outside of the metropolitan areas may not be suitable for large scale TOD the principles of TOD can be applied at local level – there will be difficulty achieving this if 60% of

Item Number	First Revision National Planning Framework 2024 Page Ref / Section	Feedback / Comment from Cork County Council
	<p>regional authorities and infrastructure providers to identify suitable opportunities for Transport Orientated Development (TOD) at scale in the five cities, aligned to planned investment in the public transport network. Transport Orientated Development supports NPF priorities for Compact Growth, Sustainable Mobility and Transition to a Low Carbon and Climate Resilient Society. Engagement with the relevant local authorities, LDA and NTA and infrastructure providers will continue to allow strategic planning for large-scale sustainable development projects to commence at the locations identified, and at locations that come forward during the NPF period. This work will facilitate the identification and development of the necessary policy provisions at national, regional and local levels, and enhanced institutional and funding arrangements required to accelerate delivery.</p> <p>The two Departments are also reviewing opportunities for better integration of land use and transport in the regional centres. While locations outside of the metropolitan areas may not be suitable for large-scale TOD, the principles of TOD can be applied at local level to support compact development, sustainable mobility and climate targets.</p>	<p>our homes continue to be delivered at the edge of settlements and in rural areas.</p> <p>Failure to achieve Transport Orientated Development will significantly undermine Ireland’s ability to reduce its greenhouse gas emissions. The EPA reports that greenhouse gas emissions from the transport sector accounted for 21.4% of national total emissions in 2023 and increased by 0.3% in 2023, having already increased by 6% in both 2021 and 2022.</p>
48.	<p><u>Page 175: National Strategic Outcome 5: Sustainable Mobility:</u></p>	<p>New reference to TOD, new emphasis on EVs, Cycle Connects, transport demand management measures including reallocation of urban road space in favour of bus, shared mobility services and walking and cycling. New reference to Moving Together – A Strategic Approach to the Efficiency of the Transport System in Ireland’ – emphasis of this on intensification however is not reflected in NPF review.</p>

Item Number	First Revision National Planning Framework 2024 Page Ref / Section	Feedback / Comment from Cork County Council
49.	<u>Page 177: National Strategic Outcome 6: Digital and Data Innovation</u>	This section should reflect the digital transformation <u>within</u> Local Authorities and not just the approach/ response of private industries to digital innovation. Ireland’s Local Government Digital and ICT Strategy 2030 – Digital Local Government: Working for Everyone should be referenced including commitments to the continued development of the online planning system and build to share systems relating to planning functions.

Appendix 2: Feedback on Tracked Changes to the First Revision of the National Planning Framework July 2024 (FR NPF 2024) SEA	
Topic	Feedback / Comment from Cork County Council
Review Report	The background monitoring data and analysis undertaken as part of the NPF review, and used to inform the proposed changes, should be made available. In particular the relationship between population growth and the requirement to deliver 50,000 houses p.a. and how the renewable energy targets were arrived at for each region.
Formatting	The National Policy Objectives are often referred to as ‘NPO’s and it would be useful to have reference (NPO X) in each of the National Policy Objectives title to make it searchable and more user-friendly. e.g. “National Policy Objective 78 (NPO 78) Enhance water quality and resource management by preventing or mitigating the risk of flooding by.....”
Transport	Regional connectivity appears to focus on roads rather than rail, particularly at page 43, 45-47. In addition, a key enabler c12 seeks to improve rail journey times to Dublin without a corresponding enabler to improve rail journey times between regional cities i.e. Cork – Limerick, Cork-Galway, Galway-Waterford etc.

Appendix 2: Feedback on Tracked Changes to the First Revision of the National Planning Framework July 2024 (FR NPF 2024) SEA	
Topic	Feedback / Comment from Cork County Council
Key Towns	The role of key towns is unclear and there are little supporting frameworks, plan/ decision making requirements or funding following these designations identified in the NPF. A standardised approach to settlement hierarchies in Ireland should be included in the NPF with particular set of triggers/requirements/reporting obligations/funding allocation etc around the designation of key towns.
Compact Growth	<p>Consider stronger mechanisms and greater ambition to deliver compact growth based on available data / the evidence base– the information is that <i>the average rate across all counties being c.60% of development taking place within settlement boundaries.</i></p> <p>In addition, as part of the compact growth we need to include repurposing and reuse of existing vacant /derelict buildings for residential use so the term “new homes” should be revised and redefined in the glossary to include the reuse and repurposing of buildings to become ‘new’ homes.</p> <p>Furthermore, it is considered necessary to have a National Policy Objective and corresponding target associated with the reuse and repurposing of existing, vacant or underutilised buildings to deliver compact growth. Construction waste is the largest waste stream in the state amounting to over 8.2 million tonnes in 2020. We need to have reuse building targets in the NPF. All the evidence points to the need for less greenfield development, more reuse of vacant, derelict and underutilised stock, higher compact growth targets and a pattern of growth that reduces waste generation at source, particularly construction waste which is our biggest waste stream.</p> <p>The ‘sequential pattern’ of development referred to in NPO7 is welcomed in general to prevent leapfrogging away from centres however it should also apply to NPO 8 and 9. In addition, more detail is required in the NPF on phasing / zoning requirements associated with the delivery of this legally binding requirement for sequential development in NPO 7.</p>
Implementation	The NPF should have a specific implementation framework including governance structures, roles and responsibilities and funding streams for the delivery of key aspects of the NPF e.g. provision of water and wastewater services, mapping of all ecological stepping stones and corridors, monitoring and progress reporting on biodiversity and compact growth etc.

**Appendix 2: Feedback on Tracked Changes to the First Revision of the National Planning Framework July 2024 (FR NPF 2024)
SEA**

Topic	Feedback / Comment from Cork County Council
<p>Population and Human Health and Water</p>	<p><i>The SEA states that population growth will initially be targeted and prioritised to locations which have capacity in key services including but not limited to wastewater treatment in order to avoid negative effects on the receiving environment. This is a significant challenge from the planned growth strategy set out in the NPF and the binding sequential pattern of development as per NPO7 given that development will go where there is capacity in wastewater, not where the NPF says it should go. Given the risk, it is considered that significant funding and delivery plans should be provided in the NPF to ensure that the growth pattern planned for in the NPF is delivered.</i></p> <p><i>The impact of a lack of waste-water services or long-term funding programmes to provide such services in rural towns and villages makes it difficult to see how predicted growth for areas outside of regional cities up to 2040 can be directed into rural towns and villages as an alternative to one-off rural housing. It is therefore services that will decide where growth is delivered and a statement to this effect is totally insufficient and inadequate as mitigation to deliver compact growth as per the NPF.</i></p> <p><i>It is noted that, on the one hand, SEO 5 for Population and Human Health seeks that wastewater is compliant with relevant EU standards however, on the other hand, National Strategic Outcome 9 Sustainable Management of Water and other Environmental Resources seeks risk management approaches to minimise the impact of non-compliances with all relevant EU Directives and to safeguard against future compliance risks. It is therefore unclear how the SEA concludes that “<i>impacts are broadly and indirectly positive for W, PHH and MA in the short to long term</i>”. The issue of population growth negatively impacting on water should be accurately assessed in the SEA and a far deeper analysis of the growth proposed in the context of the existing and likely future environmental baseline should be provided.</i></p> <p><i>NSO9 sets out “Ensuring that public and private water services investment decisions are aligned with the broad strategic aims of the NPF”. This outcome should be strengthened to recognise that significant investment is required to deliver the infrastructure needed in tandem with the planned growth in the NPF and that a funding programme should follow to achieve NPO9 in line with delivering the NPF growth.</i></p> <p><i>A health impact assessment of the NPF should be undertaken to inform the review of the NPF.</i></p> <p><i>NPO 37 could include a health NPO specifically related to planning / placemaking i.e. that development should make daily physical activity an unavoidable part of the environment. The National Physical Activity Plan and the Healthy Ireland Framework as referenced in NPO 37 do not specifically require placemaking to deliver an environment that makes daily physical activity unavoidable. It promotes more access to sports facilities, healthcare services etc. but these plans do not</i></p>

Appendix 2: Feedback on Tracked Changes to the First Revision of the National Planning Framework July 2024 (FR NPF 2024) SEA

Topic	Feedback / Comment from Cork County Council
	<p>have a town-planning or placemaking perspective where active travel is integrated into planning, urban design and placemaking.</p>
<p>Biodiversity</p>	<p>NPO 84 could be redrafted to better address the biodiversity crisis to include biodiversity enhancement, not just seeking to protect and restore. The objective should be strengthened to have a continued research, survey and monitoring obligation to measurably track how biodiversity loss is being reversed.</p> <p>NPO 85 should seek a net gain in biodiversity rather than ‘no net loss’ having regard to the poor biodiversity baseline and the existing trend of biodiversity loss.</p> <p>The biodiversity baseline doesn’t give any account of the quality, quantity or state of biodiversity value outside of protected sites, which is a gap that should be considered in the SEA. Under the sub-heading ‘Ecological Corridor’ <i>it is recognised that there is a diversity of habitats (e.g. woodlands, hedgerows, field boundaries, sand dunes, saltmarshes, rivers, streams and associated riparian zones, canals, marine habitats and wetlands) that are not subject to legislative protection although they are of high biodiversity and conservation value and contribute to the concept of ‘green infrastructure’.</i> However, there is no health or detail on the status of this biodiversity asset as a baseline under which to consider the impacts of the existing and revised NPF. A much more thorough baseline is required for the NPF to provide a robust biodiversity baseline.</p> <p>The biodiversity baseline considers Ireland’s biodiversity as a whole and goes on to list the influence of “<i>climate change, land-use change and ongoing pressure from population and economic growth</i>”. It is considered that agriculture is one of the most significant influences on Ireland’s biodiversity as a whole and should be specifically listed and considered in the baseline.</p> <p><i>Section 8.3.12 of the SEA states that there are “cumulative negative effects for BFF through species disturbance, habitat loss, habitat disturbance and fragmentation and pollution, all from these competing activities”.</i> The SEA mitigation set out in Table 9-1 or the new NPO 34 does not adequately address the cumulative negative effects on BFF and should be addressed. The NIS mitigation in the SEA suggests identifying and mapping corridors and stepping-stones outside of European sites that are necessary to ensure the function and collective coherence of European sites. The SEA is generally vague on roles and responsibilities stating that “<i>This mitigation can align with or sit within existing or future Green Infrastructure Strategies and/or County Biodiversity Action Plans; which can then be reflected through the planning hierarchy at regional and local level</i>”. Whilst mapping an ecological network of stepping stones and corridors is welcomed, this mitigation is suggested to be delivered by local authorities and therefore a detailed framework setting out the roles and responsibilities and associated funding and mapping resources is required (particularly having regard the scale and size of County Cork in delivering such a task).</p>

Appendix 2: Feedback on Tracked Changes to the First Revision of the National Planning Framework July 2024 (FR NPF 2024) SEA	
Topic	Feedback / Comment from Cork County Council
Land and Soil	<p>The baseline for 'soil function' should recognise the value of areas of poorer soil for their potential value for wildlife, and respect their limitations, particularly in terms of their assimilative properties to prevent pollution.</p> <p>The performance-based design standards in Chapter 4 of the NPF should be revised to specifically state that there is a policy of prioritising infill development into brownfield sites over greenfield sites.</p>
Water	<p>The key issues and challenges impacting the water environment should include reference to septic tanks/domestic wastewater treatment systems having regard to the EPAs Domestic Wastewater Treatment System (DWWTS) Inspections Report 2023. Data on septic tank pollution should also be included in the water baseline.</p> <p>The objectives in the NPF relating to agriculture, tourism and land use in general are not linked to improvements in water quality or biodiversity which is of significant concern. In particular NPO 17, 21, 34, 35.</p>
Energy	<p>Figure 5.28 some text is omitted in the pie chart.</p> <p>The sustainability of data centres should be assessed- baseline data that Data Centres are the largest source of energy demand growth in Ireland, with the CSO reporting in 2022 that 18% of Ireland's metered electricity was consumed by data centres, the same level of metered consumption as all urban homes in 2022. The International Energy Agency (IEA) reports that Ireland's current stock of data centres is expected to grow by 65% in the coming years, with 14 data centres under construction and 40 approved in planning. Cumulative impacts should be considered.</p>
Alternatives	<p>Assessment of alternatives should consider an ecosystem services approach to allocating growth. Alternatives should take account of monitoring data and where the NPF review has recommended a new approach. The background monitoring data and analysis undertaken as part of the NPF review, and used to inform the proposed alternatives, should be made available.</p>
Mitigation	<p>In general, where mitigation is recommended in the SEA and not adopted /implemented a rationale should be included as to why mitigation has not been implemented.</p>
Monitoring	<p><i>General</i></p> <ul style="list-style-type: none"> • A specific NPO is considered necessary in the NPF to commit to implementing environmental monitoring and reporting as set out in the SEA. <p><i>Baseline data</i></p>

**Appendix 2: Feedback on Tracked Changes to the First Revision of the National Planning Framework July 2024 (FR NPF 2024)
SEA**

Topic	Feedback / Comment from Cork County Council
	<ul style="list-style-type: none"> • In 2023 the DHLGH undertook a review of the monitoring for the first cycle of the NPF. Whilst the summary provided in Section 9.2.3 is welcomed, the full review document should be made available to consider. The monitoring of one-off housing done through the expert Group Monitoring Report and from e-planning / local authority reporting should be collected and made available, in particular. <p><i>Population and Human Health</i></p> <ul style="list-style-type: none"> • There needs to be a robust monitoring framework for one-off housing including a measurable target allocated to one off housing. The frequency of monitoring every 5 years is not adequate and more regular monitoring is needed e.g. yearly reporting from local authorities. • One of the key aspects in monitoring the delivery of the NPF is whether brownfield sites are being developed in preference to greenfield sites. The indicator for soil should therefore be revised to monitor proportion of <i>housing</i> i.e. (new homes and reuse of existing buildings for residential use) located within the built-up footprint rather than <i>population growth</i>. The soil target doesn't follow the rationale of finding out if brownfield sites are being developed in preference to greenfield sites. • It is not clear that monitoring the implementation of 'Healthy Ireland Implementation Plan' will deliver sufficient data to review the effectiveness or otherwise of the NPF. The Healthy Ireland Implementation Plan aims to build the role of the Health Services in supporting the development of healthy environments that help people and staff to adopt healthy behaviours. It's mainly focused on HSE work environments and initiatives in the workplace. The relevant key strategic action "Supporting healthy behaviours from childhood through to healthy ageing" does not have specific actions on the built environment and makes no mention of active travel or providing active travel priority over car-based design. The governance structure outlined in Figure 6 of the Implementation Plan doesn't include the Department of the Environment or associated departments. It is considered that a more detailed indicator relevant to the NPF would be the delivery of the "Healthy Ireland Strategic Action Plan 2021–2025" as it does have a specific town planning and sustainable development focus with aims to, for example: <ul style="list-style-type: none"> ○ Develop a Healthy Cities and Counties Strategic Development Plan;

**Appendix 2: Feedback on Tracked Changes to the First Revision of the National Planning Framework July 2024 (FR NPF 2024)
SEA**

Topic	Feedback / Comment from Cork County Council
	<ul style="list-style-type: none"> ○ Promote the implementation of the Design Manual for Urban Roads and Streets (2013) which incorporates good planning and design practice to support and encourage active travel (walking and cycling) in urban areas; ○ Promote planting of ‘protection forests’ along rivers and lakes to protect water quality and assist in managing flood risk; and ○ Work to ensure that through the Healthy Cities and Counties Network, all local authorities embed actions on obesity prevention in future County and City Development Plans and Local Economic and Community Plans. <ul style="list-style-type: none"> ● The indicator of access to blue and green spaces should be revised to include the percentage of the population with access to green and blue space <i>via sustainable transport mode</i> (public transport or active travel). Determination of what is/isn’t included as green and blue infrastructure should be specifically defined in the glossary. <p><i>Water</i></p> <ul style="list-style-type: none"> ● The target for the Remedial Action List should be revised to have no remedial action list having regard to SEO 5 which seeks that wastewater is compliant with relevant EU standards. <p><i>Climate / Climatic factors</i></p> <ul style="list-style-type: none"> ● To monitor commuting travel patterns, it is recommended that the threshold for remediation be revised. The EPA reports that in 2023, transport emissions increased slightly by 0.3% on 2022 and, at 11.8 Mt CO₂eq, represented 21.4% of national total emissions. In this context, and in the context of Ireland’s climate emergency, it is suggested that consideration should be given to identifying the remediation threshold as a particular minimum decrease of car travel, e.g. a decrease of less than 20% in the proportion of people (as a percentage) using private vehicles rather than sustainable and active travel since Census 2022. This is also relevant to the following indicator: Commuting travel patterns within MASPs according to Census data. ● It is noted that the SEA monitoring makes a number of references to ‘sustainable and active travel’. As active travel (walking, wheeling or cycling) is inherently sustainable it may be more accurate to substitute references to ‘sustainable and active travel’ with ‘public transport and active travel’ in order for the targets to be accurately measured.

**Appendix 3: Feedback on Tracked Changes to the First Revision of the National Planning Framework July 2024 (FR NPF 2024)
SFRA**

<i>SFRA Section Reference</i>	<i>Feedback / Comment from Cork County Council</i>
<p>Section 1.4 Best Available Information</p>	<p>The National Coastal Flood Hazard Maps (NCFHM) should be referenced and included in the list of available links www.floodinfo.ie for Best Available Information, as these have superseded the ICPSS maps.</p>
<p>Section 2</p>	<p>Procedure for undertaking a SFRA on a national scale is presented and outlined. In Section 2. 1 reference to the aim of the SFRA to set out appropriate flood protection and mitigation measures where appropriate could also be referenced in this section.</p>
<p>Section 2.6 Climate Change</p>	<p>Guidance on climate change objectives and actions is set out in the ‘Flood Risk Management Climate Change Sectoral Adaptation Plan’ published in 2019 by the OPW should be referenced in the text in this Section.</p> <p>The long-term goal adopted by the OPW on climate adaptation for flooding and flood risk management could be incorporated into this section as presently there is no reference to the environment or sustainable communities in this section. “Promoting sustainable communities and supporting our environment through the effective management of the potential impacts of climate change on flooding and flood risk”.</p> <p>There is no reference to the MRFS or HEFS in this section. Should this be included in this section in accordance with the OPW scenarios?</p> <p>The OPW have adopted two indicative potential futures for assessing flood risk: the Mid- Range Future Scenario (MRFS) and the High-End Future Scenario (HEFS). These were selected to reflect, based on information available at the time, a future in the latter part of the century that would be:</p> <ul style="list-style-type: none"> • typical or near to the general average of the future climate projections (MRFS), or • a more extreme future based on the upper end of the range of projections of future climatic conditions and the impacts such changes would have on the drivers of flood risk (HEFS). <p>OPW Climate Change Allowances- Consider including a table to show the allowances, in flood risk terms, for both the MRFS and HEFS could also be helpful in this section.</p> <p>NPO 78 & NPO 79 are referenced in this section. Text in NPO 79 could be stronger. At present it says to support the management of stormwater, rainwater and surface water. This should be required and stronger language to require this rather than support would be more beneficial.</p>

**Appendix 3: Feedback on Tracked Changes to the First Revision of the National Planning Framework July 2024 (FR NPF 2024)
SFRA**

<i>SFRA Section Reference</i>	<i>Feedback / Comment from Cork County Council</i>
Section 3	Study Area is identified, and a high-level flood risk appraisal is contained in Section 3.
Section 3.2	Existing Flood Risks is very brief and includes a paragraph on each Region. Understanding that this is a high-level flood risk appraisal it could be further developed to reference all types of flooding. Southern Region only references fluvial and coastal flooding.
Section 4	Flood Risk and Spatial Planning Issues are discussed in this section. A line or two on the consequences of flooding and the importance on the reliability of the mitigation measures could be referenced. Determined by the hazards associated with the flooding (e.g., depth of water, speed, flow, rate of onset, duration, wave action, water quality) and the vulnerability of the people, property, and environment assets potentially affected (e.g., age profile of the population, type of development, presence, reliability of mitigation measures).
Section 4.2	Should reference Cork County Councils other planned Flood Relief Schemes- reference is only made to Midleton Flood Relief Scheme and referred to as Cork City Suburb area with an expectation to be commenced in mid-2026.
Section 5	Details a discussion of the NPOs which consider flood risk management.
Section 5.1.1 Mitigation Measures	This section references NPOs 78,79 and 80. A lot of emphasis throughout the document is placed on NPO 78 in terms of the purpose it plays on controlling the sustainable development of the country in terms of flood risk. The statement that this policy will ensure implementation of the Guidelines to ensure that development follows the sequential approach to avoid non appropriate development in flood prone areas. Equally, NPOs 78,79 and 80 are referenced throughout the assessment and proposed mitigation measures (in Appendix 1) that they shall also ensure that development should include SuDs and Nature-based solutions to ensure runoff is controlled to the at least the greenfield runoff rate.

**Appendix 3: Feedback on Tracked Changes to the First Revision of the National Planning Framework July 2024 (FR NPF 2024)
SFRA**

<i>SFRA Section Reference</i>	<i>Feedback / Comment from Cork County Council</i>
	<p>These policy objectives (NPOs 78, 79 and 80) could benefit from reference to the RMP best practice guidance document, <i>'Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas – Water Sensitive Urban Design'</i> (March 2022) and <i>'Rainwater Management Plans – Guidance for Local Authorities'</i> (May 2024).</p> <p>General references to Rainwater management plans and their purpose of being <i>'plan led'</i> appraisals of a settlement which inform future urban planning and decision making could also be included in the text this section. The role that RMPs and their implementation have on managing rainwater on the surface using nature-based systems to minimise the risk of harm from flooding and pollution while enhancing the urban environment through improved provision for amenity and biodiversity could all be considered for inclusion to reference in this SFRA.</p> <p>Reference is also made in this section to pluvial flood extents maps being useful for assessing flood risks within the compact urban areas with the following recommendation made:</p> <p>Currently no pluvial flood maps are available outside of Dublin City Area. <i>It is recommended that pluvial flood extent maps be prepared for the other Metropolitan cities (Cork, Galway, Limerick and Waterford) and also for the regional major towns like Athlone and Sligo. This can be included in Policy 78. (page 16 of SFRA)</i></p> <p><i>Comment: This has not been proposed in NPO 78 presently</i></p> <p>A lot of reference is made throughout the document to NPOs 78,79 and 80, particularly in the proposed mitigation measure in Appendix A. This is referenced in the following Chapter Proposed Mitigation Measures: Chapters 2, 3,4,5,6,7,8,9 and 10. It is also the proposed mitigation measure for the SEA Ref for the Key Future Planning and Development and Placemaking Policy Priorities for the Southern Region and Key Future Growth Enablers for Cork.</p> <p>In light of this, some comments to these NPOs are outlined below for consideration.</p> <p>NPO Amendment 78</p> <p>Enhance water quality and resource management by preventing and mitigating the risk of flooding by:</p> <ul style="list-style-type: none"> – Ensuring flood risk management informs place-making by avoiding inappropriate development in areas at risk of flooding in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities. – Taking account of the potential impacts of climate change on flooding and flood risk and consideration of the Flood Risk Management Climate Change Sectoral Adaptation Plan.

**Appendix 3: Feedback on Tracked Changes to the First Revision of the National Planning Framework July 2024 (FR NPF 2024)
SFRA**

<i>SFRA Section Reference</i>	<i>Feedback / Comment from Cork County Council</i>
	<p>– Ensuring that River Basin Management Plan objectives are fully considered throughout the physical planning process.</p> <p>– Integrating sustainable water management solutions, such as Sustainable Urban Drainage (SuDS), non-porous surfacing and green roofs, and nature based solutions, to create safe places.</p> <p>Comment: RMP techniques for inclusion could be considered in this NPO as part of the last point with an emphasis on rainfall collection at property level: techniques within the boundaries of public and private properties to collect runoff from buildings, carparks etc and release flow slowly to the drainage network. This includes more than just green roofs and non-porous surfaces. Referencing the RMP National Guidance documents here might be more appropriate? Temporary storage of rainfall within public open space and other amenity spaces (Could be linked to creating safe places) and can be designed to be multi-functional, serving their primary function on a day-to-day basis, and coming into operation to temporarily store rainfall and protect others from flooding during significant downpours and extreme cloudbursts.</p> <p>Should reference also be made to any subsequent Flood Risk Guidelines that may issue?</p> <p>NPO 79 NEW: Support the management of stormwater, rainwater and surface water flood risk through the use of nature-based solutions and sustainable drainage systems.</p> <p>Note: Include the storage of rainfall alongside with management. Is this NPO looking at the wider catchment area? If so, surface flows upslope of the urban area should be managed to better protect the urban areas and reduce the pressure on existing drainage networks. Flows can also be managed downslope of the urban area to protect others downstream.</p> <p>80 NEW: Support the retrofitting of existing environments to cater for surface water run-off through the use of nature-based solutions, including the implementation by Uisce Eireann of Integrated Drainage Plans on a prioritised settlement basis.</p>
Section 5.2	<p>(NSO 9) Sustainable Management of Water and Other Environmental Resources. This is a welcome amendment as it is referencing the need to implement the EU Floods Directive, implementing the Flood Risk Management Plans (FRMP) and the CFRAM Programme and stormwater management. In line with the above comments there could be further amendments in this section made to the need to prepare and implement RMPs and the recently published national document on this. No mitigation measures are proposed in Section 5.2.2 Mitigation Measures/Recommendations- should there be?</p>

**Appendix 4: Feedback on Tracked Changes to the First Revision of the National Planning Framework July 2024 (FR NPF 2024)
Cork County Council Ecology Office Comments (including NIR)**

Objective No	Objective	Previous NPO	Ecology Office Comments
<p>Cork County Council notes the revised targets as set out in the NPF which aim to provide for increased growth and development nationally as well as in Co. Cork. We welcome the references in the revised NPF to the 4th Biodiversity Action Plan, the National Climate Plan, the Nature Restoration Law and the upcoming National Nature Restoration Plan in the revised NPF. To strengthen linkages between the National Biodiversity Action Plan and to ensure implementation of mitigation measures required to avoid impacts on biodiversity generally and on EU sites in particular (as set out in the NIS for the plan), we have some recommendations for amendments to existing draft objectives and for the addition of new objectives as follows:</p>			
31	<p>Facilitate the development of the rural economy, <i>in a manner consistent with the national climate objective</i>, through supporting a sustainable and economically efficient agricultural and food sector, together with forestry, fishing and aquaculture, energy and extractive industries, the bio-economy and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting <i>biodiversity and</i> the natural landscape and built heritage which are vital to rural tourism.</p>	23	<p>Suggest rewording: Facilitate the development of the rural economy, <i>in a manner consistent with the national climate</i> and biodiversity protection <i>objectives</i>, through supporting a sustainable and economically efficient agricultural and food sector, together with forestry, fishing and aquaculture, energy and extractive industries, the bio-economy and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting <i>biodiversity and</i> the natural landscape and built heritage which are vital to rural tourism.</p>
34	<p><i>Support the agri-food industry in promoting Ireland's continued food security in a manner that ensures economic, environmental, and social sustainability while ensuring progress in achieving targets in the National Climate Action Plan and the River Basin Management Plan.</i></p>	New	<p>Suggest rewording: <i>Support the agri-food industry in promoting Ireland's continued food security in a manner that ensures economic, environmental, and social sustainability while ensuring progress in achieving targets in the National Climate Action Plan and the River Basin Management Plan and the National Biodiversity Action Plan.</i></p>
55	<p><i>Support the development of coastal management plans to address the likely effects of sea level changes and coastal flooding and erosion and to support the implementation of adaptation responses in vulnerable areas.</i></p>	New	<p>Suggest clarification. At what level, national, regional or local are these plans to be prepared. Who will be preparing them. How will they align with RSES and CDP's When will they be prepared?</p>

**Appendix 4: Feedback on Tracked Changes to the First Revision of the National Planning Framework July 2024 (FR NPF 2024)
Cork County Council Ecology Office Comments (including NIR)**

Objective No	Objective	Previous NPO	Ecology Office Comments
67	<p><i>The planning system will be responsive to our national environmental challenges and ensure that development occurs within environmental limits, having regard to the medium and longer-term requirements of all relevant environmental and climate legislation and the sustainable management of our natural capital.</i></p>	52	<p>Noble aspiration. Would be useful to clarify how environmental limits are to be identified.</p>
74	<p><i>Support the co-location of renewable technologies with other supporting technologies and complementary land uses, including agriculture, amenity, forestry and opportunities to enhance biodiversity and promote heritage assets, at appropriate locations which are determined based upon the best available scientific evidence in line with EU and national legislative frameworks.</i></p>	New	<p>Suggest rewording: <i>Support the co-location of renewable technologies with other supporting technologies and complementary land uses, including agriculture, amenity, and forestry while protecting biodiversity and the environment. Seek opportunities to enhance biodiversity and promote heritage assets, at appropriate locations which are determined based upon the best available scientific evidence in line with EU and national legislative frameworks.</i></p>
78	<p><i>Enhance water quality and resource management by preventing or mitigating the risk of flooding by:</i></p> <ul style="list-style-type: none"> <i>• Ensuring flood risk management informs place-making by avoiding inappropriate development in areas at risk of flooding in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities.</i> <i>• Taking account of the potential</i> 	57	<p>Suggest cross reference to obligations on OPW as set out in NBAP 2D7- i.e. development of Nature based solutions for catchment management.</p>

**Appendix 4: Feedback on Tracked Changes to the First Revision of the National Planning Framework July 2024 (FR NPF 2024)
Cork County Council Ecology Office Comments (including NIR)**

Objective No	Objective	Previous NPO	Ecology Office Comments
	<p><i>impacts of climate change on flooding and flood risk and consideration of the Flood Risk Management Climate Change Sectoral Adaptation Plan.</i></p> <ul style="list-style-type: none"> • <i>Ensuring that River Basin Management Plan objectives are fully considered throughout the physical planning process.</i> <p><i>Integrating sustainable water management solutions, such as Sustainable Urban Drainage (SUDS), non-porous surfacing and green roofs, and nature based solutions, to create safe places.</i></p>		
81	<p><i>Integrated planning for Green and Blue Infrastructure will be incorporated into the preparation of statutory land use plans while maintaining ecosystem services and ecosystem functions and conserving and/or restoring biodiversity.</i></p>	58	<p>Suggest rewording: <i>Integrated planning for Green and Blue Infrastructure will be incorporated into the preparation of statutory land use plans while with the objective of protecting, maintaining and developing ecosystem services and ecosystem functions and conserving and/or restoring biodiversity.</i></p>
82	<p><i>Identify and strengthen the value of greenbelts and green and blue spaces at a regional, city and local scales, to enable enhanced connectivity to wider strategic networks and prevent coalescence of settlements and to allow for the long-term strategic expansion of urban areas. Promote and support an increase in the provision of green and blue spaces and tree canopy cover in settlements.</i></p>	62	<p>Suggest NPF include targets for percentage of land within specified boundaries (settlement boundaries, green belts, MD's) to be set aside for GBI and also target for percentage of tree cover to be maintained / established within settlements.</p>

**Appendix 4: Feedback on Tracked Changes to the First Revision of the National Planning Framework July 2024 (FR NPF 2024)
Cork County Council Ecology Office Comments (including NIR)**

Objective No	Objective	Previous NPO	Ecology Office Comments
83	<p><i>In line with the National Biodiversity Action Plan and the European Union Nature Restoration Law, and best available scientific information, regional and local planning authorities shall support the preparation of the National Restoration Plan.</i></p>	<p>New</p>	<p>Suggest rewording: <i>In line with the National Biodiversity Action Plan and the European Union Nature Restoration Law, and best available scientific information, regional and local planning authorities shall support the preparation and implementation of the National Restoration Plan.</i></p>
84	<p><i>In line with the National Biodiversity Action Plan; the conservation, enhancement, mitigation and restoration of biodiversity is to be supported by:</i></p> <ul style="list-style-type: none"> <i>• Integrating policies and objectives for the protection and restoration of biodiversity, including the avoidance and/or minimization of potential biodiversity impacts, in statutory land-use plan.</i> <p><i>Retention of existing habitats which are currently important for maintaining biodiversity (at local/regional/national/international levels), in the first instance, is preferable to replacement/restoration of habitats, in the interests of ensuring continuity of habitat provision and reduction of associated risks and costs.</i></p>	<p>New</p>	<p>Suggest rewording: <i>In line with the National Biodiversity Action Plan, the conservation, enhancement, restoration and where necessary mitigation of impacts on biodiversity is to be supported by Integrating policies and objectives for the committing to the</i></p> <ul style="list-style-type: none"> <i>• protection and restoration of biodiversity, including the avoidance and/or minimization of potential biodiversity impacts; and</i> <i>• the retention of existing habitats and/or sites which are important for maintaining biodiversity (at local/ regional/ national/ international levels).</i> <p>into Statutory Land Use Plans.</p>

Appendix 4: Feedback on Tracked Changes to the First Revision of the National Planning Framework July 2024 (FR NPF 2024) Cork County Council Ecology Office Comments (including NIR)			
Objective No	Objective	Previous NPO	Ecology Office Comments
85	<i>In line with the objectives of the National Biodiversity Action Plan, planning authorities should seek to address no net loss of biodiversity within their plan making functions.</i>	New	<p>Suggest rewording: <i>In line with the objectives of the National Biodiversity Action Plan, Planning Authorities should seek to address shall commit to ensuring that there is no net loss for biodiversity within their functional areas arising as a result of their planning and development functions.</i></p> <p>Note: The NIS commits the Department to the development of guidance to assist Planning Authorities to achieve the objective of working towards no net loss of biodiversity as a necessary mitigation to ensure the avoidance of impacts on EU sites. It is recommended that the commitment to the preparation of such guidelines be included in this objective and cross referenced to the NBAP objective 3C2.</p> <p>Consider also amending objective to require LAs to aim for Biodiversity Net Gain rather than No Net Biodiversity Loss.</p>
86	<p><i>Enhance the conservation status and improve the management of protected areas and protected species by:</i></p> <ul style="list-style-type: none"> <i>Implementing relevant EU Directives to protect Ireland's environment and wildlife and support the objectives of the National Biodiversity Action Plan.</i> <i>Developing and utilising licensing and consent systems to facilitate sustainable activities within Natura 2000 sites.</i> <i>Continued research, survey programmes and monitoring of habitats and species.</i> 	59	<p>Suggest rewording committing to the resourcing of Regional and Local Authorities to support the implementation of the National Biodiversity Action Plan, County Biodiversity Action Plan and National Restoration Plan.</p>

**Appendix 4: Feedback on Tracked Changes to the First Revision of the National Planning Framework July 2024 (FR NPF 2024)
Cork County Council Ecology Office Comments (including NIR)**

Objective No	Objective	Previous NPO	Ecology Office Comments
--------------	-----------	--------------	-------------------------

Recommendations for Additional Objectives:

1. Include NBAP Vision for Biodiversity and the National Climate Objective as overarching guiding principles of the NPF.
 - **National Climate Objective: Achieve a competitive, low-carbon, climate-resilient, biodiversity rich and environmentally sustainable and carbon neutral economy by 2050.**
 - **NBAP Vision: Biodiversity in Ireland is valued, conserved, restored and sustainably used, maintaining ecosystem services, sustaining a healthy planet and delivering benefits for all people.**
2. Include an objective to reflect action 3C2 of the NBAP - OPR Biodiversity Guidance – link to mitigation measure specifying the development of such guidance in the NIS.
3. Include an objective to reflect action 3C3 of the NBAP i.e. need for alignment of RSES, CDP’s and LAPs with NBAP.
4. Include an objective committing to alignment of the National Land Use review with the objectives of the NBAP.
5. Include a timebound commitment for the designation of Marine Protected Areas.

Observations on Mitigation Measures Set out in Draft Revised NPF - Natura Impact Statement

1. There is an overarching mitigation measure set out in the NIS for the revised NPF which commits to the identification, describing and mapping of ecological corridors and stepping-stones outside of EU sites. The measure relies on account being taken by Planning Authorities of these corridors during plan preparation and project consenting. It is suggested that this mitigation could be achieved through the development of County Biodiversity Action Plans and or Green Infrastructure Strategies, therefore, it is assumed that it is expected that this measure would be implemented at County Level. In order for this mitigation to be successful, and for Local Authorities to remain in compliance with same, the exercise of identifying, mapping and describing ecological corridors outside EU sites, will need to be completed on a timeline which allows it to inform the next round of plan making and land use zoning. We recommend that this measure would be included as an objective within the NPF and that the linkage of this to the AA process be made clear in the plan (cf Objectives 83, 84, 85 and 86). Guidance and resourcing will be required to ensure that this exercise is carried out to a high standard and in a consistent manner across the state. It is recommended that the NPF would include commitments to provide for same.
2. There is a commitment in the NIS mitigation measures to the preparation and publication by the Department of a science-based methodology by which no net loss can be demonstrated for Local Authorities land use planning remit. It is stated in the NIS that the mitigation will address viable options/mechanism to address losses where these are identified at a project level. It is desirable that this guidance would be prepared and delivered in advance of the next CDP cycle to ensure Planning Authorities remain in compliance with the mitigation measures specified within the

**Appendix 4: Feedback on Tracked Changes to the First Revision of the National Planning Framework July 2024 (FR NPF 2024)
Cork County Council Ecology Office Comments (including NIR)**

Objective No	Objective	Previous NPO	Ecology Office Comments
NIS established for the revised NPF. It is recommended that Objective 85 of the plan itself would include this commitment.			

Appendix 4 – Infrastructure Requirements for Key Growth Areas in Cork County & Additional Key Enablers

Appendix 3: Infrastructural Requirements for Key Growth Areas in Cork County	
Cork County: Key Growth Areas	Development Potential & Infrastructure Requirements
Cork County Development Plan provides for over 47% of the overall County Settlement Growth to be targeted at County Metropolitan Settlements. In addition, over 60% of County Metropolitan growth is targeted at Rail-based Settlements.	
Midleton	
<p>Midleton is the largest growth location in County Metropolitan Cork and the largest town in East Cork with an Urban Expansion Area at Water Rock. Current population stands at 13,906 (Census 2022). In the two-year period after the adoption of the County Development Plan housing consents are in place for 2,409 residential units.</p> <p>Midleton builds on the success of the town’s rail connections to Cork City, its industrial base and specialist roles in the food and beverage sector as well as tourism assets.</p>	<p>Infrastructure Investment Needs:</p> <ul style="list-style-type: none"> ▪ Delivery of improved rail services under CMATS; ▪ Continued Delivery of Water Services upgrades from Uisce Eireann; ▪ Midleton Urban Expansion Area infrastructure package; ▪ Local Transport Oriented Development access improvements; ▪ Public realm improvements/upgrades under approved URDF funding; ▪ Delivery of N25 road upgrade.
Carrigtwohill	
<p>Carrigtwohill is County Cork’s joint second fastest growing settlements with development currently proceeding and planning consents in place for 913 residential units since the adoption of the County Development Plan in 2022.</p> <p>Carrigtwohill is maximising rail connectivity and the economic potential of the town as a Strategic Employment Area through the IDA Business Park.</p> <p>Carrigtwohill has an Urban Expansion Area at Carrigtwohill North and IDA Strategic Landbank at Carrigtwohill East/Ballyadam.</p>	<p>Carrigtwohill</p> <ul style="list-style-type: none"> ▪ Delivery of improved rail services under CMATS; ▪ New Carrigtwohill Traffic & Transport Traffic Study, to include N25 upgrade and/or north and south connections to possible future Ballyadam interchange; ▪ Carrigtwohill Urban Expansion Area infrastructure package; ▪ Continued Delivery of Water Services upgrades from Uisce Eireann; ▪ Local Transport Oriented Development access improvements and public realm upgrades; ▪ Cobh Road Junction Interim measures upgrade; ▪ Delivery of N25 road upgrade.

COUNTY METROPOLITAN CORK (including Rail Based Settlements)

Cobh	
Cobh is the fourth largest growth location in County Metropolitan Cork. By population it is the second largest settlement in the County with a population of 14,148 (census 2022). Cobh has significant growth potential within its Urban Expansion Area lands.	<ul style="list-style-type: none"> ▪ Delivery of improved rail services under CMATS; ▪ Delivery of Great Island Connectivity Scheme – including upgrade to R624; ▪ Delivery of N25 road upgrade; ▪ Continued public realm enhancements as funded under URDF; ▪ Continued delivery of Water and Wastewater infrastructure from Uisce Eireann; ▪ Ballynoe Valley Urban Expansion Area Phased Infrastructure Packages; ▪ Local Transport Oriented Development access improvements.
Little Island	
Strategic Employment Location within County Metropolitan Cork, with significant opportunity to sustainably integrate employment and complementary residential uses with public transport.	<ul style="list-style-type: none"> ▪ Delivery of improved rail services under CMATS; ▪ Continued improvements to local access and public transport in line with the Little Island Transportation Study; ▪ Delivery of N25 road upgrade;
Glounthaune	
Sustainable growth location in County Metropolitan Cork with connections to rail serving local employment locations.	<ul style="list-style-type: none"> ▪ Delivery of improved rail services under CMATS; ▪ Local Transport Orientated Development access improvements
Monard	
Proposed new rail-based Metropolitan town in County to provide for a population growth of 4,000 TBC . This will require an infrastructure package as set out in the SDZ Planning Scheme. Notwithstanding the potential yields from compact growth, Cork will need new, sustainable growth locations to delivery 2040 growth targets – as provided by Monard.	<ul style="list-style-type: none"> ▪ SDZ Phased Infrastructure packages as outlined in the SDZ Planning Scheme.
Carrigaline	
Carrigaline is one of the largest settlements in the County with a population of 18,239 (census 2022) with development currently proceeding and planning	<ul style="list-style-type: none"> ▪ Investment in public transport connecting Carrigaline within Metropolitan Cork; ▪ Continued roll-out of measures outlined in the Carrigaline TPREP; ▪ Public realm improvements/upgrades as approved through URDF funding; ▪ Local Transport Oriented Development access improvements.

	<p>permission in place for 272 residential units since the adoption of the County Development Plan in 2022.</p> <p>Carrigaline adjoins the strategic employment location of Ringaskiddy which has significant IDA enterprise assets, world leading marine research centres, and is integral for life sciences (pharma, biopharma and med-tech).</p>	
	<p>Passage West / Monkstown</p> <p>Passage West / Monkstown is an important residential area based around excellent recreational facilities, harbour setting and greenway.</p> <p>Passage West / Monkstown is connected to cork city via a high quality active travel route and the Council is progressing plans to extend that route to the Strategic Employment Location of Ringaskiddy and the Town of Carrigaline.</p>	<ul style="list-style-type: none"> ▪ Delivery of improved public transport services under CMATS; ▪ Continued public realm and local access improvements including active travel connectivity; ▪ Local Transport Oriented Development access improvements.
<p>GREATER CORK RING (including Rail Based Settlement of Mallow)</p>	<p>The Greater Cork Ring Strategic Planning Area has been allocated 30% of the total population growth for the County to 2028, and within the Ring area 53% of the growth has been allocated to the main towns .</p>	
	<p>Mallow (Key Town)</p> <p>Mallow is one of the top five growth locations in County Cork with a population of 13,465 (census 2022) with development currently proceeding and planning permission in place for 465 residential units since the adoption of the County Development Plan in 2022.</p> <p>Mallow is a rail-based settlement with connectivity to strategic employment locations.</p>	<ul style="list-style-type: none"> ▪ Continued rail service improvements; ▪ Local Transport Oriented Development access improvements; ▪ Continued water services improvements; ▪ Delivery of additional public realm improvements building upon URDF funded works.
	<p>Greater Cork Ring</p> <p>The Greater Cork Ring consists of the main towns of Mallow (as above) as well as Bandon, Fermoy, Kinsale, Macroom and Youghal. These towns form the key settlement network in the Greater Cork Ring SPA, perform well in terms of resident jobs and collectively will support employment-lead growth appropriate to settlement scale. This will require a programme of co-</p>	<ul style="list-style-type: none"> ▪ Continued public transport bus service enhancements; ▪ Local Transport Oriented Development access improvements; ▪ Continued water service improvements; ▪ Delivery of public realm enhancements.

	ordinated bus public transport, roads, water service and public realm improvements.	
NORTH CORK	North Cork has been allocated 11% of the county's population growth to 2028 and 54% of this growth has been allocated to the main towns listed below.	
	North Cork North Cork consists of the main towns of Buttevant, Charleville, Kanturk, Millstreet, Mitchelstown and Newmarket. These towns form the key settlement network in the North Cork SPA, perform well in terms of resident jobs and collectively will support employment-lead growth appropriate to settlement scale. This will require a programme of co-ordinated bus public transport, roads, water service and public realm improvements.	<ul style="list-style-type: none"> ▪ Continued public transport bus service enhancements; ▪ Local Transport Oriented Development access improvements; ▪ Continued water service improvements; ▪ Delivery of public realm enhancements.
WEST CORK	West Cork has been allocated 12% of the county's population growth, and 57% of the growth has been allocated to the main towns of West Cork listed below.	
	West Cork West Cork consists of the main towns of Bantry, Castletownbere, Clonakilty (Key Town), Dunmanway, Schull and Skibbereen. These towns form the key settlement network in the West Cork SPA, perform well in terms of resident jobs and collectively will support employment-lead growth appropriate to settlement scale. This will require a programme of co-ordinated bus public transport, roads, water service and public realm improvements.	<ul style="list-style-type: none"> ▪ Continued public transport bus service enhancements; ▪ Local Transport Oriented Development access improvements; ▪ Continued water service improvements; ▪ Delivery of public realm enhancements.
OTHER SETTLEMENTS & RURAL AREAS	The NPF, RSES & Cork 2050 recognise the capacity and strategic importance of all the County, including rural communities. These locations are important local growth areas, with planned for employment and population growth appropriate to their scale.	
	Other Settlements & Rural Areas Revitalising Rural Areas and Rural Networks to make it collectively one of Europe's most creative, innovative, green and liveable regions.	<ul style="list-style-type: none"> ▪ Continued public transport bus service enhancements; ▪ Local Transport Oriented Development access improvements; ▪ Continued water service improvements; ▪ Delivery of public realm enhancements; ▪ Delivery of Broadband services;

	<p>Rural Areas, depending on their assets, location and population density have differing needs requiring targeted solutions. This requires an integrated approach to rural economic development, including support for public services.</p> <p>The policy objectives in the RSES relating to rural development seeks to:</p> <ul style="list-style-type: none"> • Deliver the sustainable actions under the Rural Development Programme 2014-2020; • Drive initiatives in the Rural Economic Development Zones; • Support innovation in rural communities; and, • Encourage diversity in the rural economy. 	
ADDITIONAL KEY ENABLERS	<p>Cork County growth locations overlap with both regional and national scaled infrastructure. A co-ordinated approach to infrastructure delivery and management will be required by all stakeholders, with shared funding responsibilities.</p>	
	<p>Additional Key Enablers – In addition to those listed above under Key Growth Areas</p> <ul style="list-style-type: none"> • M20 Cork to Limerick Road • N25 Carrigtwohill to Midleton Road Upgrade* *Also requires new access junctions between N25 and Midleton, Carrigtwohill, Ballyadam, R624 Road to Cobh (Cobh Cross). • R624 Road Upgrade - N25/Cobh *Great Island Connectivity Scheme • N28 Cork to Ringaskiddy Road • N72/N73 Mallow Relief Road • R630 Upgrade from N25 to Aghada/Whitegate • Cork Northern Distributor and Link Roads linking the N20 to Dunkettle. • Monard SDZ Phased Infrastructure packages • Access to Monard SDZ under the National Roads Programme • N72 strategic road improvement from Kerry via Mallow and Fermoy to Waterford 	

- | | | |
|--|--|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | <ul style="list-style-type: none"> • N73 strategic road improvement from Mallow to Mitchelstown linking to the M8 • N22 strategic road improvement linking Cork to Kerry (Killarney) • N71 strategic road improvement from Cork via West Cork to Kerry • Upgrade the R586 Regional Road from Bandon to Bantry via Dunmanway and support for designation to National Road Status • Upgrading of the R572 linking Castletownbere Port to the N71 • Advancing transport study measures for Little Island • Feasibility study of high speed rail between Dublin, Limerick Junction, Mallow and Cork • Bandon Town Northern Relief Road • Bandon Southern Relief Road – Phase 2 • Mallow Northern Relief Road • Clonakilty Northern Relief Road and Western Relief Road • Programme of Town Flood Defences for County Towns • Lower Harbour wastewater outfall to sea pipeline • Inniscarra water supply extension to eastern harbour area • Funding and policy support to address the impacts of the Fresh Water Pearl Mussell habitat designation on the Blackwater, Bandon and Owenagapall catchments. • Extension of Atlantic Economic Corridor Initiative to Cork County and Metropolitan Cork • Expansion / re-activation of Cork County ports network – Ringaskiddy, Cobh, Rushbrook, Kinsale, Bantry, Castletownbere, Youghal, Baltimore, Ballycotton, Union Hall, Schull. |
|--|--|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

A renewable energy vision for the Cork Harbour & Coastline

Establishing Cork as Ireland's leading offshore wind energy and green industry location

March 2024



Comhairle Contae Chorcaí
Cork County Council



Executive Summary



Why establish Cork as Ireland's leading offshore wind energy and green industry location?



Ireland is committed to doing its part to meet the challenge of climate change and has legislated to deliver a net zero economy no later than 2050.

Many greenhouse gas reduction successes have been achieved over the last two decades, primarily through the adoption of renewable electricity and lower emission fuels.

However we must now redouble our efforts and scale the development of renewables by moving offshore, decarbonise our industries and bring our communities and stakeholders on the journey.

Cork is a net energy exporter to Ireland, harnessing Cork's offshore wind resource will allow the State to become a significant international exporter of renewable energy, goods and services.

The economic uplift from building the initially planned 450MW of offshore wind generation off the Cork coast is estimated at €230M, with significant additional generating capacity and economic uplift delivering further regional and national economic benefits.

Ireland and Europe have mobilised to address the hard to abate aviation and marine sector emissions. Ireland's only refinery located in Whitegate/Aghada is key to delivering on these commitments and capitalising on the opportunities.

Demand flexibility and zero carbon generation is key to delivering a net zero economy, the existing grid capacity and industry located around the Cork Harbour and Coastline will play a strategic role in delivering this.

Due to multiple educational institutes and a highly educated workforce, Cork delivers twice the economic output per person compared to the national average. The offshore renewable energy sector can benefit from this workforce whilst creating demand for further specialist skills.

In addition, a step change opportunity will come from utilising ORE to deliver green energy industrial parks / green energy valley in Cork Harbour.

The Cork Harbour & Coastline's unique collection of strategic national assets – including its ports – make it the ideal location to be among the early movers of Ireland's offshore wind industry and a primary location for a green industry hub.

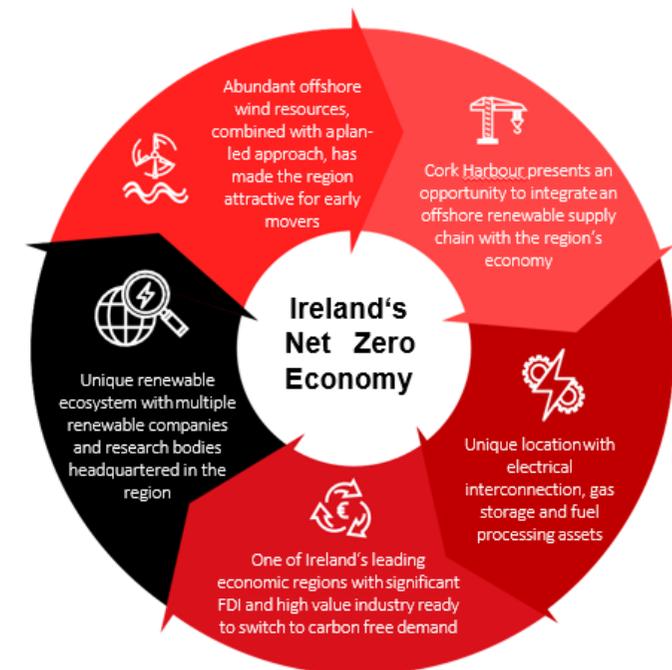


Table of Contents



01	Cork Harbour & Coastline Renewable Industry Potential	Page 05
02	Principles & Strategic Objectives	Page 10
03	Coastline Renewable Vision	Page 18
04	Planning & Economic Policy Alignment Assessment	Page 22
05	References	Page 27

01

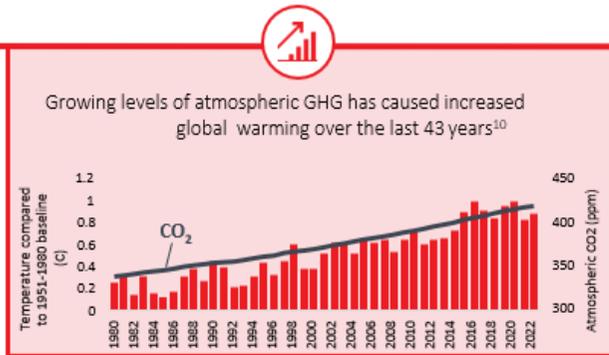
Cork Harbour & Coastline Renewable Industry Potential



We are facing a climate crisis and need to fully decarbonise our economy to address this




1.5 °C
Paris agreement target to limit global warming




Climate change – a global challenge requiring local action

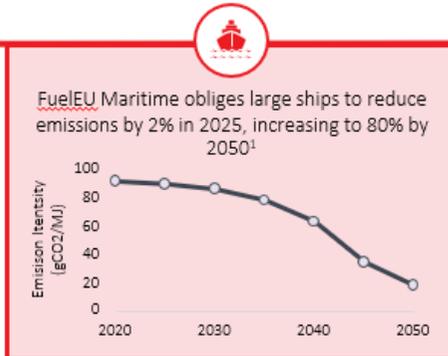
The latest report from the Intergovernmental Panel on Climate Change (IPCC) concluded that “climate change is affecting nature, people’s lives and infrastructure everywhere” and that “climate change is a grave and mounting threat to our wellbeing and a healthy planet”. The report highlighted that, “climate change is a global challenge that requires local solutions” and there is a “narrowing window for action.”



↓ 55%
European Green Deal target for 2030 emission reduction

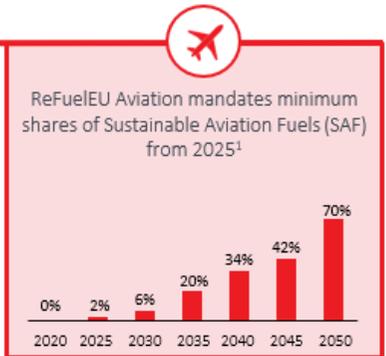


EU target of 42.5% renewable energy by 2030⁷ aided by member states establishing renewable acceleration areas with simplified permitting timelines and procedures




The EU is increasing its sustainability, security, and independence in energy through RePowerEU¹¹

- Target of 15% electrical interconnection by each member state by 2030⁸
- Target of 10MT/year hydrogen production within the EU and 4MT of ammonia imports



Ireland's offshore wind potential can decarbonise the Cork and Irish economy as well as availing of export opportunities



↓ 51%
Irish target for 2030 emission reduction



Ireland has legislated for Carbon Budgets⁶. Each budget set the allowable GHG emission over a 5-year period.

CB1 (2021-2025): 295 Mt CO₂

CB2 (2026-2030): 200 Mt CO₂

CB3 (2031-2035): 151 Mt CO₂



Ireland's electricity demand is projected to grow by 45% to 2030 and 100%+ by 2050

Projected Irish electricity demand (TWh/y)^{5, 6}

Year	2022	2030	2040	2050
Demand (TWh/y)	34	45	65	78



Ireland aims to become a net exporter of energy by developing **37GW of offshore wind generation**

Projected peak electricity demand and target offshore wind capacity⁵

Category	2030	2040	2050
Peak Demand (GW)	~10	~15	~20
Offshore Wind (GW)	0	~10	~37



Ireland's plan to decarbonise heating:⁴

- 5.7 TWh biomethane by 2030
- 215,000 heat pumps by 2025 and 680,000 by 2030
- Up to 0.8 TWh district heating by 2025 and 2.5 TWh by 2030



0
Net Greenhouse Gas (GHG) emissions by 2050



The 42 Mt CO_{2eqv} from Ireland's agriculture sector will be particularly difficult to abate

Ireland's 2022 emissions by sector

Sector	Emissions (Mt)
Agriculture	16.1Mt
Transport	8.0Mt
Energy industries	7.0Mt
Residential	4.2Mt
Industry	4.6Mt



Ireland's renewable electricity targets will be delivered primarily by offshore and onshore wind generation⁴

Category	2025 Target	2030 Target	
Renewable energy share	50%	80%	
Demand Side Flexibility	15-20%	20-30%	
Onshore Wind	6 GW	9 GW	
Solar	5 GW	8 GW	
Offshore Wind	0 GW	5 GW	37 GW

Cork has a unique collection of strategic assets to support the establishment of a large offshore renewable sector and stands to benefit from a renewable hub first mover advantage



#1

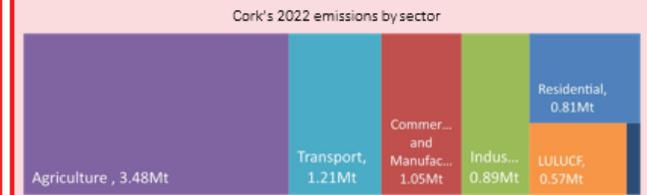
Cork is Ireland's largest county by area and second largest by population



Cork is well-positioned to be a leader in Ireland's transition to a net zero energy system. Cork is Ireland's second largest economic area and hosts key components of Ireland's energy landscape. The county is among the most profitable on a per person basis with a rapidly growing workforce, highly esteemed research institutions, large presence of multinational industries and is well-connected in terms of transport, fiber networks, and the electrical grid. Cork is well positioned to expand its thriving renewable energy sector through deployment of offshore wind generation, carbon-free demand, large scale energy storage, future fuels, and a strong pipeline of additional onshore renewables.



Agriculture is the largest contributor to Cork's emissions followed by energy use³²



34%

Ireland's expected growth in electricity demand from 2022 to end of the decade¹⁸



Cork is a net electricity exporter¹⁸



Offshore Wind Potential¹⁹

Ireland's first DMAP (Designated Maritime Area Plan) for Offshore Renewable Energy is proposed to be located off Ireland's South Coast. The ORESS 2.1 auction will provide support for up to 900MW of capacity from this South Coast DMAP.

€230m: Estimated economic uplift in Cork from Initial offshore wind granted in ORESS 2.1 (450 MW)³⁶



Onshore renewables^{28, 29}

Cork County has excellent wind conditions with 41 operational wind farms owned and operated by major international renewable energy companies. Cork has a strong pipeline of solar farms with 56 granted planning since 2014 and 5 more under consideration.



Dispatchable Generation

Cork has two large dispatchable power plants at Aghada and Whitegate which are currently examining options for the transition to carbon free operation.²¹



Seasonal Energy Storage Potential

ESB and dCarbonX⁹ are developing plans to repurpose the Kinsale gas field for large scale hydrogen storage. It is estimated that up to 67 TWh²³ of energy could be stored here with the green hydrogen produced locally using offshore renewable electricity.

Cork is an established economic powerhouse region in Ireland and can serve as a demonstrator of how to decarbonise industry and hard to abate sectors using offshore renewable resources



 <h2>#1</h2> <p>Cork has the highest economic potential amongst small cities in Europe¹³</p>	 <p>Cork Airport is the 2nd largest in the country.</p> <p>2.7M passengers forecast in 2023¹⁶</p>	 <p>Port of Cork is Ireland's 2nd largest with 4.39 Mt (18% of national) of goods so far in 2023¹⁷</p> <p>Port of Cork is a designated "Core Port" in the Trans-European Transport Network (TEN-T)³⁴</p>	 <p>Well-connected with international telecoms connectivity to North America and the UK³⁵.</p>	 <p>Cork is part of the EU's TEN-T road network³⁴ and well-served by major roads to Limerick, Waterford, and Dublin</p>	 <p>Home to University College Cork, Munster Technological University and the National Maritime College</p> <p>36,000+ students³³ in Cork County</p>	 <p>Ireland's first interconnector to mainland Europe, the Celtic Interconnector will terminate in Cork²⁰</p> 			
 <h2>19%</h2> <p>Cork's contribution to Ireland's GDP²</p>	 <p>Cork is Ireland's second largest county by population with almost 600,000 inhabitants and a workforce of c.264k, with c.30k jobs in the harbour region alone. ^{14,15,25}</p> <p>7% 2016 - 2022 population growth</p> <p>850,000 2050 population estimate</p>	 <p>The South-West region (Cork and Kerry) is an economic leader, delivering almost double the national average ²⁴</p> <p>€135,000 GVA per person for the South-East region</p>	 <p>Cork hosts a range of leading multinational firms across the biopharma, life sciences, maritime economy, agri-business and energy sectors³⁰.</p>	 <p>Cork's energy and telecoms infrastructure make it an attractive region to develop data centre capacity aligned to the Government's Principles for Sustainable Data Centre Development. Cork first data centre is already in construction.</p> <p>Irish data centre electricity demand (TWh/y)²¹</p> <table border="1"> <tr> <td>2022</td> <td>2031</td> </tr> <tr> <td>5.5</td> <td>12.9</td> </tr> </table>	2022	2031	5.5	12.9	 <p>In addition to its universities, Cork is home to well-recognised research institutions including APC, INFANT, MaREI, and Insight.</p>
2022	2031								
5.5	12.9								

02 Principles & Strategic Objectives



Five principles to guide the development of a strategic plan



Vision Statement

Use Cork's existing strategic energy infrastructure, ports and natural energy storage assets as a platform to establish Cork as a leading offshore renewable energy location, with early mover advantage for green industrial parks / a green energy valley and associated maritime services.



Cork County Council's Role

By securing national/regional policy support and financial investment and working with our partners through the Regional Enterprise Plan: Promote and support the establishment of Cork Harbour as Ireland's primary offshore renewable energy location by helping to create the frameworks and stakeholder networks for the development of large-scale renewables and green industries in the Cork region.

Principles for development of a Strategic Plan

We recommend using five discrete principles to guide the development of a strategic plan for Cork's role in unlocking offshore wind energy opportunities in Ireland. The principles reflect Cork's unique position given the scale of energy and port infrastructure already in place; its proximity to subsea energy storage assets and the high concentration of industrial and commercial activity already in place along the coastline. For context, each principle is mapped to the relevant United Nation's Sustainability Goal.

01

Play a leading role in Ireland's transition to a net zero energy system by harnessing our coastal natural resources

02

Expand the region's infrastructure to enable offshore renewable energy deployment at scale, deliver supply chains and enable full decarbonisation.

03

Stimulate economic growth by creating green jobs and industries linked to the deployment of clean energy

04

Uphold the highest environmental standards and deliver a nature positive economy with a climate resilient coastline

05

Deliver economic, social and environmental benefits for our communities



Principle 01

Play a strategic role in Ireland's transition to a Net Zero energy system by harnessing our coastal natural resources

- Position Cork as an attractive location for onshore and offshore renewable generation development.
- Support the development of Ireland's offshore renewable resources in the Celtic Sea.
- Become a net exporter of zero carbon electricity over the short- to medium-term.
- Support the achievement of Ireland's heat demand decarbonisation targets, locally and nationally.
- Support the achievement of Ireland's transport decarbonisation targets, locally and nationally.
- Become a net exporter of zero carbon energy over the long term for Ireland's benefit.





Principle 02

Expand the region's infrastructure to enable offshore renewable energy deployment at scale, deliver supply chains and enable full decarbonisation

- Increase connectivity of renewable energy production assets, energy storage assets and demand sources to enable whole of energy system decarbonisation.
- Deliver critical infrastructure that addresses national energy infrastructure needs over the long-term including decarbonisation of road haulage, rail, maritime and aviation transport.
- Enhance port infrastructure to maximise the opportunity from Offshore Renewable Energy in the Cork region and nationally.
- Enhance the region's digital infrastructure with international and national connectivity to support decarbonisation as outlined in the Government's digital strategy.
- Deliver energy storage facilities to maintain Ireland's security of supply throughout the energy transition.

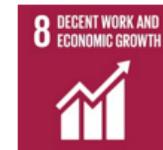




Principle 03

Stimulate economic growth by creating green jobs and industries linked to the deployment of clean energy

- Work with public and private sector stakeholders to deliver the skills required for the energy transition with focus on Offshore Renewable Energy in Cork.
- Transition existing businesses and industry in Cork to zero carbon energy supplies in line with national Frameworks.
- Ensure a just transition for existing industries impacted by the transition to net zero emissions.
- Establish Cork as an attractive location for green finance investments and foreign direct investment.
- Establish Cork as a key location in the national offshore wind industrial strategy supporting fixed bottom and floating offshore wind generation technologies.
- Position Cork within national and international offshore renewable energy supply chains driving industrial expansion and jobs in Cork.





Principle
04

Uphold the highest environmental standards and deliver a nature positive economy with a climate resilient coastline

- Support the achievement of the goals and targets under the Global Biodiversity Framework.
- Support the delivery of key actions under Ireland’s 4th National Biodiversity Action Plan (due 2024).
- Support the recommendations of Ireland’s Citizens’ Assembly on Biodiversity Loss.
- Support a just nature transition through community based, landscape scale nature restoration programmes – delivering benefits to people, nature and climate.
- Help ensure that the cork coastline is resilient to the impacts of climate change.

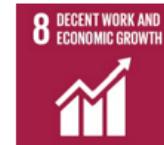




Principle 05

Deliver economic, social and environmental benefits for our communities

- Ensure meaningful engagement with communities and citizens on development of the Cork Coastline in support of offshore wind energy developments.
- Ensure renewable energy development is performed in the interest of local communities and wider society.
- Work with public and private sector stakeholders to ensure communities benefit directly from hosting renewable resources, infrastructure and industry.
- Work with public and private sector stakeholders to ensure upskilling opportunities are available to our communities.



High-level outline of a Strategic Action Plan



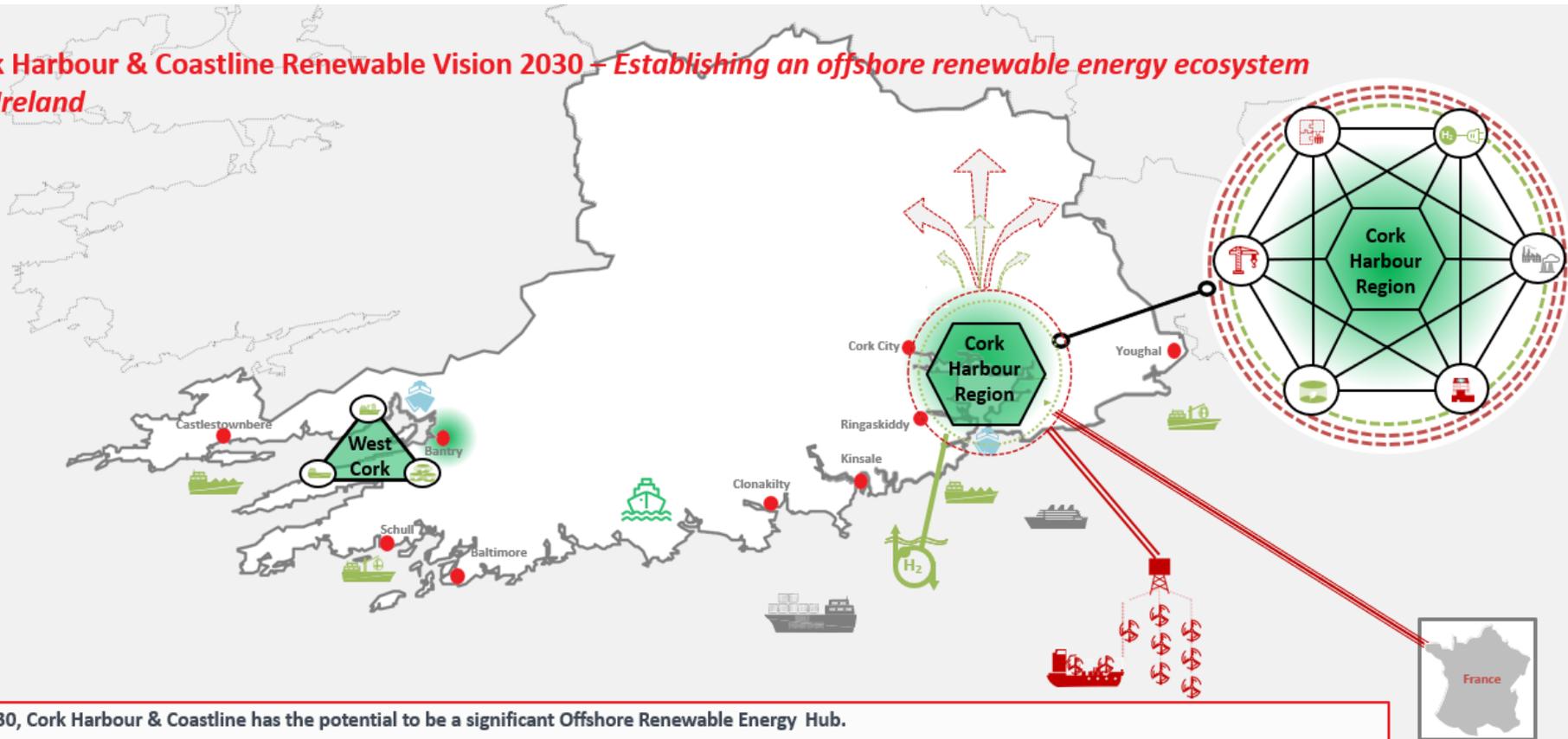
	1. Net Zero energy system	2. Enhanced Infrastructure	3. Stimulate economic growth	4. Deliver a nature positive economy	5. Social and economic benefits from ORE
Critical action #1	Future fuels: Support the production, distribution and storage of future fuels, such as hydrogen.	Offshore wind: Support the delivery of the necessary infrastructure to deploy offshore wind generators off the Cork coast.	Offshore Wind Industrial Strategy: Ensure that Cork's unique potential to support offshore wind energy is reflected in the strategy.	Coastal protection: Protect coastal vulnerability of the Cork coastline.	Community benefits: Advocate for benefit sharing schemes from offshore wind development of the Cork coast.
Critical action #2	Zero-carbon electricity generation: Facilitate the deployment of zero-carbon electricity generation using the regions strong transmission infrastructure.	Interconnectors: Facilitate the completion of the Celtic Interconnector project thereby connecting Ireland's electricity grid with mainland Europe.	Developing green industry: Cork County Council to support business and enterprise plans for green demand (ICT and others).	Improving resilience: Cork County Council to support climate adaption measures for infrastructure and support delivery of the measures.	Educate and inform Cork County citizens: Cork County Council to support climate action communication for Cork County citizens.
Critical action #3	Seasonal energy storage: Support ongoing studies into the use of KESTREL as a seasonal hydrogen storage facility for Ireland.	Port of Cork: Enable delivery of the Port of Cork's masterplan including capacity to support offshore wind energy supply chains locally in Cork.	Marketing Cork: Support the relevant state agencies and business groups to market Cork as a clean energy destination.	Climate Adaption: Support coastal <u>eco-system based</u> adaption.	Coastline: Through statutory development plan processes, ensure public consultation.

03

Coastline Renewable Vision

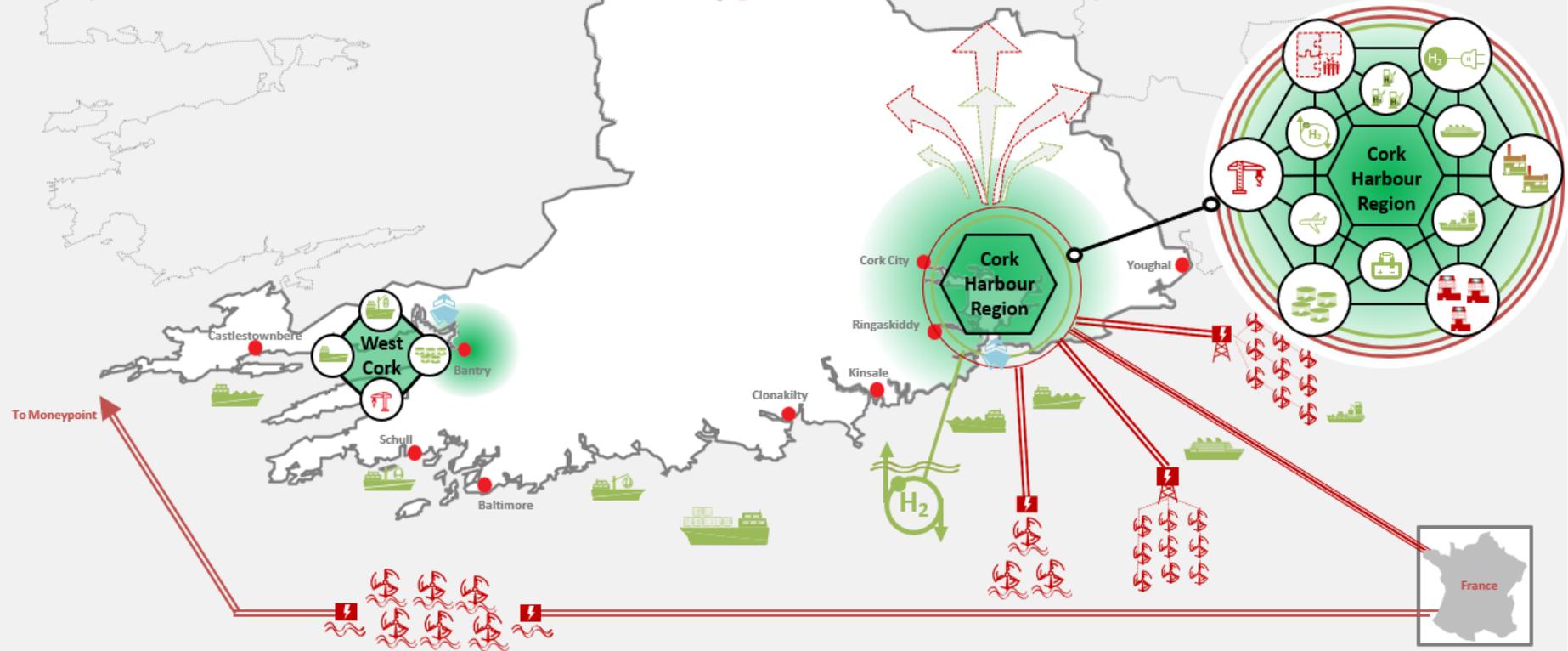


Cork Harbour & Coastline Renewable Vision 2030 – Establishing an offshore renewable energy ecosystem for Ireland



- By 2030, Cork Harbour & Coastline has the potential to be a significant Offshore Renewable Energy Hub.**
- Offshore wind generators will be operating off the Cork Coast providing large volumes of renewable power to the all-island grid
 - Cork Harbour will have established and activated offshore wind assembly, marshalling and servicing capability
 - The Celtic Interconnector, Ireland’s first high-capacity electricity connection to mainland Europe will be operational while the Kestrel gas storage facility will be well under development
 - Abundant offshore renewable energy will enable the decarbonisation of industrial demand and future fuel demonstration projects, developing the pathways to decarbonise the Irish economy

Cork Harbour & Coastline Renewable Vision 2050 – Powering Ireland’s Net Zero Economy



By 2050, Cork Harbour & Coastline can become zero carbon energy hubs integrating offshore renewables with future fuel production and seasonal energy storage

- The addition of floating offshore wind can enable Cork to become a significant exporter of renewable energy, both national and internationally
- Future fuels such as green hydrogen, green ammonia and e-SAF can be produced in Cork using offshore renewables, serving local and national needs
- Large volumes of green hydrogen can be stored at the Kestrel gas storage facility providing energy security for Ireland and serving regional industrial needs
- The Cork Harbour and Coastline can be a hub of green industry investment, combining both FDI in offshore renewables and industry

Legend

Legend



Offshore renewable energy innovation park



Celtic Interconnector



Offshore wind – fixed bottom



Floating offshore wind



Natural gas fired generation



Renewable fuels infrastructure



Zero carbon data centre



Hydrogen Refuelling Station



Underground hydrogen storage



Carbon free shipping & fishing



Offshore renewables supply chain



Sustainable Aviation Fuel



Dispatchable Renewable Generation



Renewable electricity surplus to rest of Ireland



Renewable gas surplus to rest of Ireland



Offshore electricity grid



Partially decarbonised industry



Cork Ports



Green hydrogen production



Fossil fuel powered shipping



Carbon free tourism



Low carbon electricity grid



Virtual hydrogen network



Zero Carbon electricity grid



Hydrogen network

04 Planning & Economic Policy
Alignment Assessment



Planning & Economic Policy Alignment (1/4)



The planning & economic policy matrix presented below provides a high-level overview of key policy documents at national, regional and local scale that the vision set out aligns with. The matrix summarises key policies that give strategic direction for new green economy opportunities. The Principles and Strategic Objectives set out within the Renewable Energy Vision for Cork Harbour & Coastline are consistent with relevant national, regional and local planning policy frameworks. Further detail on key planning & economic policy referred to below is provided as an Appendix to this document. This policy matrix and supporting Addendum should be used as a key reference source and validator for objectives and actions emerging from the Vision set out. This is a summary overview only and does not reflect all policy enablers.

Policy Document	Specific policy/objective (summary overview of key policies – non exhaustive)	Opportunity?	Principles Align?	Vision Align?	Funding?
<i>National Development Plan 2021-20230</i>	NSO5 Strengthened Rural Economies NSO8 Transitioning to a Climate Neutral and Climate Resilient Society	NSOs set a strong strategic support landscape for forthcoming Cork Harbour Strategy. Can be best leveraged at site feasibility and development stage.	Yes – closely aligned with all	Yes – directly responds and supports	Yes – various strategic investment priorities including funds for energy research and climate action
<i>National Planning Framework (NPF)</i>	NSO5: Strong Economy supported by Enterprise, Innovation and Skills NSO6: Transitioning to a Low Carbon and Climate Resilient Society NPO42 Support Offshore Renewable Energy Development Plan and its successors NPO55 'Promote renewable energy use and generation at appropriate locations within the built and natural environment	Provides overarching planning policy setting out the opportunity and support, at national level for the green renewable economic in Cork Harbour.	Yes – closely aligned with all	Yes – directly responds and supports	NDP funding
National Maritime Framework Plan 2021	Ireland's first statutory maritime spatial plan - Overarching Marine Planning Policies for co-existence and infrastructure are supplemented by several Sectoral Marine Planning Policies, most of which are aimed at achieving economic objectives which will, in turn, support the Cork Harbour Strategic Plan. Sets policy for marine related employment.	Policies and targets for all maritime area proposals including those likely to be pursued under the strategy	Yes – closely aligned with all	Yes – directly responds and supports	-
<i>IDA Ireland - Driving Recovery and Sustainable Growth 2021-2024</i>	Renewable Energy identified as key 'Area of Opportunity', focus on Just Transition, promoting economic activity in regions in response to decarbonisation. Focus on South-West Cork region with target to gain 118 new investments by 2024. Sustainability Framework set out to guide development of sectoral led strategies for <u>decarbonisation</u> infrastructure and green finance etc.	Yes – can give ideas for strategy to leverage and respond to.	Yes – directly responds to all	Yes – directly responds	IDA has a range of supports for <u>renewables based investment</u> .
<i>Enterprise 2025 Renewed</i>	Seven Small Business Innovative Research (SBIR) initiative identified including 'Support investment and commercialisation of technologies that drive improvements in energy efficiencies, including in renewables' etc.	Yes – SBIR initiative can help stimulate/drive investment	Yes – directly responds particularly no. 4	Yes – directly responds	Small Business Innovative Research (SBIR) initiative

Planning & Economic Policy Alignment (2/4)



Policy Document	Specific policy/objective (summary overview of key policies – non exhaustive)	Opportunity?	Principles Align?	Vision Align?	Funding?
<i>Leading in a Changing World Strategy 2022-2024</i>	Strategy ambitions include: Export-focused Irish enterprises delivering growth across all regions. Irish enterprises achieving competitive advantage through customer-led innovation and <u>digitalisation</u> . Irish enterprises leading globally on sustainability and achieving climate action targets.	Heavy focus on just transition and circular economy market opportunities	Yes – directly responds to all particularly no. 4	Yes – directly responds	Enterprise Ireland have various funding sources for green renewables aligning with this strategy
<i>RSES for Southern Region (2020)</i>	Cork MASP sets context and identifies strategic assets for Cork MASP region including for strategic marine sector facilities and target sectors. RPO 50 A diverse base of smart economic specialisms across all sectors include renewables RPO 60 Low Carbon Economy accelerate the transition towards low carbon economy and circular economy, new green technologies RPO 64: Facilitate new business formation, growth and industrial <u>reorganisation</u> RPO 64 Facilitate new business formation, growth and industrial <u>re-organisation</u> RPO 80 Marine Resource and Blue Economy RPO 85 Renewable offshore energy	Yes – directly responds. Key planning policy that strategy must align with	Yes – directly responds most notably 3 and 5	Yes – directly responds	Various sectoral funds e.g. Enterprise Ire High Potential Start Ups (HPSUs) fund Climate Action Competitive Fund
<i>Powering Prosperity Ireland's Offshore Wind Industrial Strategy</i>	Powering Prosperity aims to “ <i>maximise the economic benefit of achieving Ireland and Europe's ORE targets by creating a solid domestic supply chain and resilient ORE industry.</i> ” The strategy sets out Ireland's ambitious plan to achieve its net zero energy targets for 2030 through 2050 focusing on action in 2024 and 2025. The 40 actions to be implemented in 2024 and 2025 are anchored in 4 core pillars: <i>Offshore wind supply Chains</i> <i>Research, Development & Innovation</i> <i>Future Demand and End Uses for Renewable Energy</i> <i>Balanced Regional Economic Development Opportunities.</i>	Yes – Strategy recognises economic benefits of delivering offshore wind targets	Yes	Yes	Recognition of external European funding Dedicated action to deliver long term funding options to support scaling Irish offshore wind supply chain companies Targeted funding supports
<i>Accelerating Ireland's Offshore Energy Programme: Policy Statement on the Framework for Phase Two Offshore Wind</i>	Phase 2 of the government offshore wind program seeks to provide the remainder of the 5GW target by 2030, which phase 1 will have largely contributed to. The government has further targeted an additional 2GW of floating offshore wind for <u>the production of green hydrogen</u> to create a necessary environment to develop a hydrogen industry. The framework highlights the importance of the Renewable Energy Support Scheme (RESS) and ORESS schemes in providing a route to market for pipeline projects. A consultation held in January 2024 provides a framework that looks beyond phase 2 developments and the 2030 targets.	Yes – additional offshore capacity through Phase 2	Yes	Yes	Refers to availability of EU funding

24

Planning & Economic Policy Alignment (3/4)



Policy Document	Specific policy/objective	Opportunity?	Principles Align?	Vision Align?	Funding?
<i>South Coast Offshore Renewable Energy Designated Maritime Area Plan Proposal</i>	Designated Maritime Area Plan (DMAP) Proposal will be located off the South Coast of Ireland and puts forward an initial 'proposed' geographical area within which future offshore renewable energy development may take place. The DMAP will publish in 2024 and will determine the broad area where offshore renewable energy projects can be developed and act as a management plan for a specific area of our marine waters. It will support the indigenous ORE sector.	Yes – draft DMAP to be published in early 2024 will be open for public consultation.	Yes – directly responds to all most notably 1 and 2	Yes – directly responds	-
<i>Cork County Development Plan 2022-2028 and associated Appendices</i>	Gives strong focus and attention to Cork Harbour Region –sets key planning and economic policy/objectives that the Strategy should leverage and respond to. Defines the Harbour Region, two <u>harbour clusters</u> , key towns Cobh, Carrigtwohill, Midleton, Passage West/Glenbrook/Monkstown and Carrigaline), and four no. Strategic Employment Locations - SELs (<u>Ringaskiddy</u> , Little Island, Carrigtwohill and Whitegate/Aghada) . Sets policy for Cork Harbour Economy (CHE) including: EC8.1 Promote Cork Harbour as a unique and strategic asset, seek investment & strengthen potential as a location of choice for FDI EC8.2 Employment Strategy – gives cues on employment network EC8.3 Strategic Employment Location at Carrigtwohill, Little Island, <u>Ringaskiddy</u> , Whitegate EC: 8-6 Develop, deepen and enhance economic resilience and sustainable growth by supporting economic diversity, widening economic sectors, boosting innovation, export diversification.....	SELS to give forthcoming strategy strong spatial focus / targeting actions towards development of these sites	Yes – direct support / alignment for all particularly 3, 4 & 5	Yes – direct alignment	Local Enterprise Office (LEO) Supports and Grants e.g. Priming Grants for Start-Ups
<i>Cork County Development Plan 2022: Volume 4 South Cork: Cobh</i>	Identifies Strategic Employment Locations (e.g. <u>Ringaskiddy</u> , Little Island, Carrigtwohill and Whitegate/Aghada) which play a crucial role in the economic development of the region. Defines 'industrial' lands zonings across the various receiving settlements of the CHR that will play a leading role in the on the ground deployment of strategy actions/recommendations.	Yes – direct alignment – key opportunity / target site for strategy outcomes	Yes – direct support / alignment for all particularly 3, 4 & 5	Yes – direct alignment	Cork County Development Plan 2022: Appendix 4 South Cork: Cobh
<i>Cork County Development Plan 2022: Volume 5 West Cork of CDP</i>	Identifies policy objectives aimed at encouraging renewable energy projects across settlements within the West Cork Region. Recognises the capability of Castletownbere of positioning itself as a premier fishing port and commercial base to service the offshore renewable and exploration industry due to its strategic location, deep-water port, and onshore infrastructure. Identifies the port of Castletownbere to function as a base for offshore energy explorations and renewable energy projects.	<i>Strong policy support to develop opportunities for the port Castletownbere</i>	Yes	Yes	As per CDP

Planning & Economic Policy Alignment (4/4)



Policy Document	Specific policy/objective	Opportunity?	Principles Align?	Vision Align?	Funding?
<i>Port of Cork Masterplan 2050</i>	Clear focus on ORE Very active in enabling green energy sector – consideration of key locations for development of ORE	Strategy should closely coordinate with Masterplan provisions	Yes – direct alignment most notably 3	Yes – supportive	-
<i>Our Rural Future – Rural Development Policy 2021-2025</i>	Policy Measures 26, 110, 111, 116, 140 most notable in supporting green economy for rural communities (26), including targeting measures (110), microgeneration of renewable electricity (111), investment and jobs for coastal communities (116), testbeds for innovative technologies (140)	Yes – directly responds with strong directional focus and targeting of green energy jobs	Yes – directly responds to all but 3 in particular	Yes – directly responds and supports	NDP funding
<i>Cork City Development Plan 2022-2028</i>	Forthcoming Cork Harbour Planning Framework Initiative will set a collaborative framework that will be essential in guiding the success of the forthcoming strategy. Broad range of policy / objectives relevant to marine economy and green energy including. Objective 7.20 Maritime Economy Objective 7.38 Cork Harbour Planning Framework Objective 7.20 Maritime Economy Objective 7.38 Cork Harbour Planning Framework	Strategy should seek to align and coordinate with relevant policies/objectives given shared boundaries and initiatives on Cork Harbour including on relocation of Port of Cork facilities to Cork Harbour locations.	Yes – direct support / alignment for all particularly 3, 4 & 5	Yes – direct alignment	Local Enterprise Office (LEO) Supports and Grants e.g. Priming Grants for Start-Ups

05 References



References



- 1: [Fit for 55: increasing the uptake of greener fuels in the aviation and maritime sectors - Consilium \(europa.eu\)](#)
- 2: [FuelEU maritime initiative: Council adopts new law to decarbonise the maritime sector - Consilium \(europa.eu\)](#)
- 3: [Carbon tax \(citizensinformation.ie\)](#)
- 4: Climate Action Plan 2023
- 5: EirGrid Adequacy Statement 2022-31
- 6: EirGrid: Tomorrow's Energy Scenarios
- 7: [Renewable energy directive \(europa.eu\)](#)
- 8: [Electricity interconnection targets \(europa.eu\)](#)
- 9: [Intermediate gas storage filling targets for 2024 announced - European Commission \(europa.eu\)](#)
- 10: [data.giss.nasa.gov/gistemp/tabledata_v4/GLB.Ts+dSST.txt](#)
- 11: [REPowerEU \(europa.eu\)](#)
- 12: [Atmospheric Monthly In Situ CO2 Data - Mauna Loa Observatory, Hawaii | Library Digital Collections | UC San Diego Library \(ucsd.edu\)](#)
- 13: Accelerating Ireland's Offshore Energy Programme Policy Statement on the Framework for Phase Two Offshore Wind
- 14: [Press Statement Census of Population 2022 - Summary Results Cork - CSO - Central Statistics Office](#)
- 15: [Economic Facts and Figures - Cork City Council](#)
- 16: [Cork Airport Anticipates Record Year For International Passenger Traffic](#)
- 17: [Statistics of Port Traffic - CSO - Central Statistics Office](#)
- 18: [Ireland's Energy Hub – Energy Cork](#)
- 19: [gov.ie - Consultation on ORESS Auction Design \(www.gov.ie\)](#)
- 20: [Celtic Interconnector | Projects | EirGrid](#)
- 21: [Europe's first ammonia-fuelled power plant could be built in Cork | Independent.ie](#)
- 22: [ESB and dCarbonX launch Kinsale Head Hydrogen Storage project](#)
- 23: [CCS-Ireland-Initial-Assessment.pdf \(ervia.ie\)](#)
- 24: [GVA by Region - CSO - Central Statistics Office](#)
- 25: [cork-2050-main-report-pdf.pdf \(corkcoco.ie\)](#)
- 26: [European Cities and Regions of the Future 2023 — The winners | fDi Intelligence –](#)
- 27: [Economic Facts and Figures - Cork City Council](#)
- 28: [Solar Atlas \(seai.ie\)](#)
- 29: [Wind Mapping System \(seai.ie\)](#)
- 30: [Industry - Cork City Council](#)
- 31: [EirGrid SONI 2022 Generation Capacity Statement 2022-2031.pdf](#)
- 32: [final-draft-climate-action-plan-2024-29-for-website_0.pdf \(corkcoco.ie\)](#)
- 33: [Economic Facts and Figures - Cork City Council](#)
- 34: [Trans-European Transport Network \(TEN-T\) - European Commission \(europa.eu\)](#)
- 35: [International Connectivity for Telecommunications Consultation - Key Findings](#)
- 36: [https://www.ucd.ie/earthsciences/t4media/Overview%20of%20Hydrogen%20and%20Geostorage%20Potential%20in%20Ireland.pdf](#)
- 37: [Growth of Onshore to Offshore Wind Extended Summary \(westerndevelopment.ie\)](#)

Cork 2024

Delivering the National Planning Framework

Cork City Council

Submission to the First Revision of the National Planning Framework

12th September 2024



Comhairle Cathrach Chorcaí
Cork City Council

TABLE OF CONTENTS

1.	Context.....	31
2.	Delivering NPF 2040.....	32
2.1	Compact Growth.....	32
2.2	Housing Delivery.....	33
2.3	Sustainable Transport.....	33
2.4	A Strong Economy.....	34
2.5	Scale and Connectivity.....	35
2.6	Climate Transition.....	35
3.	Development Trends.....	37
3.1	Emerging European Second City.....	37
3.2	Urban Growth.....	38
3.3	Planning for Transport Orientated Development.....	39
3.4	Cork City Docklands.....	41
3.5	Strategic Competitive Clusters.....	41
3.6	Delivering Growth at Scale.....	42
4.	Building on Strategic Opportunities.....	44
5.	Accelerating NPF 2040 Delivery in Cork.....	47

Appendices

Appendix 1: Feedback on Tracked Changes to the NPF

Appendix 2: Infrastructural Requirements for Key Growth Areas in Cork MASP

1. Context

The First Revision of the National Planning Framework (NPF) comes at a critical period for Cork City. National, regional and local growth targets are currently one-third of the way through their cycle to 2040. The NPF's objectives and policies are now integrated into regional and local plans. The remaining period out to 2040 offers the most realistic opportunities for increased alignment between national objectives and local investment and delivery.

For Cork, the remaining period of NPF implementation will be critical in realising its role as a regional driver and in delivering key enablers that achieve the scale of regional, metropolitan and city growth targeted for 2040. The continued growth of Cork is best supported by increasing the rate of implementation of the NPF 2040 and RSES for the Southern Region (2031) in a systematic manner, including increased strategic investment in innovation and best practice.

Cork is an emerging European Second City of scale that continues to grow as an internationally competitive and sustainable city. Further development will be realised through delivery of NPF targeted growth (+125,000 people by 2040) and key enablers, including Cork City Docklands. As Ireland's largest brownfield regeneration project, the Docklands will accommodate +20,000 residents and +25,000 jobs over the next decade. Cork is also home to a growing range of strategic competitive clusters, being recently named as No.2 small European city for economic potential.³ Economic progress continues with numerous large-scale employment uses recently delivered and significant scope for additional growth of existing strategic commercial clusters.

As Ireland's second-largest city, Cork provides an attractive, high-quality, resilient place in which to live, work, visit, learn and do business. Cork is well poised to deliver NPF objectives for ambitious growth, with a series of new strategies and projects in place. Infrastructural delivery will be the key requirement, with increased interventions required to increase attraction rates and accelerate growth trends. To realise these plans and projects, there is an increasing need to accelerate the “*all of government*” approach to NPF delivery. This will ensure the ambitions of the NPF stay the course by enabling city and metropolitan growth and rebalancing regional development.

Climate action is now recognised as a key priority and transformative policies are necessary to achieve sustainable growth. As an EU Mission City, Cork is committed to significantly accelerating reduction of emissions. Prioritisation of climate action will improve the quality of life for the people of the city and wider area, ensuring Cork plays a leading role in addressing the most pressing global challenge of our time. This will also enhance the resilience of the city to grow in a sustainable manner, in light of expected more frequent and extreme weather events.

In planning for compact liveable growth up to 2040, lands within the Cork Metropolitan Area have been identified for future strategic Transport Orientated Development (TOD). These highly accessible land banks have excellent access to strategic transport infrastructure, either existing or planned under the Cork Metropolitan Area Transport Strategy (CMATS). Supporting strategically planned TOD in Cork will deliver significant new residential, community and economic infrastructure and effective compact growth within easy access of the city centre.

Through increasing investment and delivery of social, economic and cultural infrastructure, Cork is poised to realise the ambitions of the NPF. Increasing the scale and rate of this investment will enhance the rate of growth, delivering ambitions for counterbalance through regions of greater scale. In this way, increasingly investing in what's good for Cork continues to be good for national and regional sustainable development.

Cork City Council submission includes more specific commentary, with the following key issues considered critical to the successful delivery of *Project Ireland 2040*:

Regional Parity: To properly address the current “*business as usual*” trajectory of current national growth trends head-on, new and coherent NPF policies are required that prioritises delivery of regional parity. Such policies need to address structural and embedded investment imbalances inhibiting the achievement of national and regional growth targets.

³ <https://www.wearecork.ie/cork-city-1st-place-finish-in-fdi-awards-for-cork-city-we-are-cork/>

Cork as Ireland's Second City: The NPF Revision should acknowledge Cork as Ireland's Second City and an emerging European Second City of scale by allocating commensurate, ambitious growth targets for the city and metropolitan area.

Reinstating Original Growth Targets: Given the overall ambition for growth in Cork City set out in the NPF, the original target for +125,000 persons by 2040 should be reinstated as a minimum. Adding an increase to this original target would demonstrate additional and justifiable support.

Increased Delivery of TOD: The NPF revision should show increased awareness and support for planning and delivery of TOD within the Cork MASP that can deliver significant new residential, community and economic infrastructure and effective compact growth.

More Focusing Investment: To date, the level of national investment allocated to Cork City and Metropolitan Area under *Project Ireland 2040* does not reflect the scale of NPF ambition for the city or its capacity to deliver. Additional national investment is required to deliver the NPF growth targets for Cork City and Metropolitan Area.

More Focused Funding Models: While funding under URDF has been welcome, a competitive bidding process between local authorities is not an efficient or effective approach for delivering strategic change. There is a need to revise NPF funding structures to ensure renewed focus on local implementation, including longer term (10-year) horizons that ensure greater funding certainty.

Investment in Urban Regeneration: While new initiatives such as *Croi Conaithe* (Cities) and *Project Tosaigh*, are welcomed, there is an increased emphasis needed on the scale of regeneration to be undertaken within Cork City Centre.

Active Land Management: Increasing active land management resources at local level will better align public and private actors, infrastructure delivery, project level funding and housing delivery at scale.

Climate Transition: The increased references to Climate Transition in the NPF revision are supported. Given Cork City's status (along with Dublin) as an "EU Mission City" there is an opportunity for the NPF Revision to include further details on the increasing role of cities in the delivery of the European Green Deal.

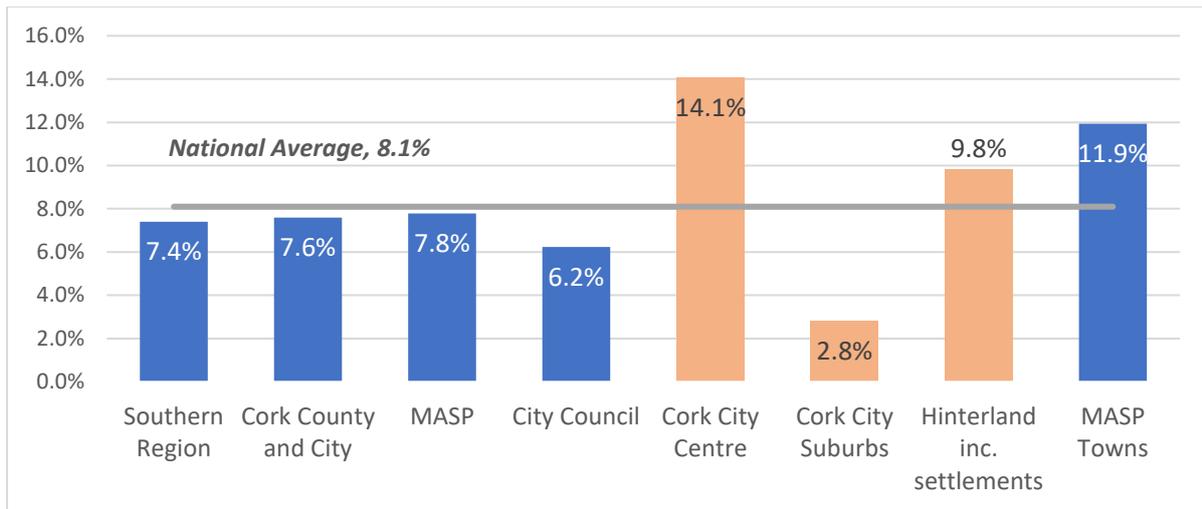
Offshore Renewable Energy (ORE): The revised NPF needs to emphasise the significant role of ORE in addressing imbalanced regional development and highlight the opportunity for Cork as a first mover in this field, including prioritising the progression of DMAPs for the Southern Region.

2. Delivering NPF 2040 in Cork

Project Ireland 2040 aims to build a more resilient and sustainable future by aligning investment plans in a cohesive manner. These aims have been translated into the Cork City Development Plan 2022-2028 and County Development Plan 2022-2028 through local objectives, policies and targets. The two-year monitoring review for both plans shows the first results of implementing national objectives for compact growth, housing delivery, sustainable transport and a strong economy at a local level.

2.1. Compact Growth

Figure 1: Population growth comparison graph 2016 -2022 (Source: Census 2022).



Population growth in Cork MASP from 2016-2022 is increasingly urban-focused. While the metro area grew by +7.8%. (+23,649 persons), this growth was strongest in the city centre (+ 14.1%) and the urban towns of Carrigaline (+16%), Ballincollig (+13%), Glanmire (+14%), Cobh (+11%) and Midleton (+11%). Cork also saw a strong reduction in housing vacancy rates, with the City’s average vacancy rate (5.6%) now notably below the national average (7.7%).

Cork City centre’s population has been steadily growing during the last two Census periods (+19% from 2011-2022)⁴, being amongst the fastest-growing areas in Cork. Census 2022 results also show how City Centre’s neighbourhoods are increasingly using sustainable modes of transport (62% using Green Modes) and attracting more diverse populations (+25% in non-Irish population), including students and foreign workers. Population growth in Cork City’s suburbs has been slower, linked to the need for key infrastructural delivery required to unlock new expansion areas.

2.2. Housing Delivery

The Cork City Development Plan 2022-2028 sets out a new housing target of 2,800 units per year. CSO data shows +3,135 residential units have been granted permission from August 2022 to March 2024. Apartments comprise the majority (74%) of permissions granted during this period, with one permission accounting for 1,557 units in the Docklands. These trends also demonstrate the effectiveness of the City Plans new density strategy in securing higher densities that achieve more compact growth in the right places. Cork City Council also exceeded the DHLGH’s target of +1,220 new social houses in the city between 2022-2023 by delivering +1,535 new homes.

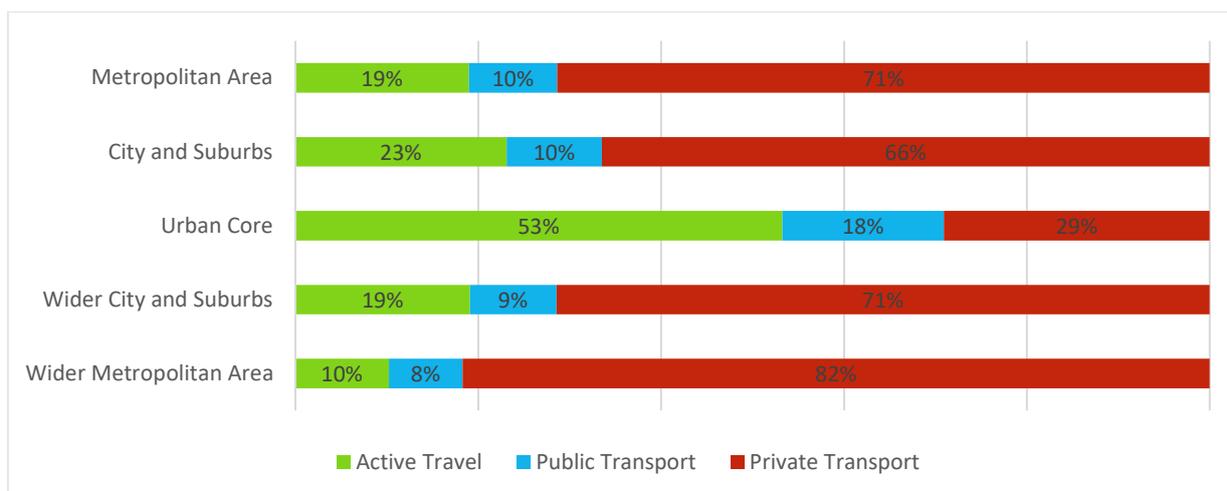
2.3. Sustainable Transport

“The South-West region exhibits a balanced, well-rounded performance across most dimensions, albeit there is room for development in transport-connectedness and environmental considerations. Enhancing transportation infrastructure and promoting a region-wide shift towards a greener economy can help further solidify the region’s attractiveness” Towards Balanced Regional Attractiveness in Ireland - Enhancing the Delivery of the National Planning Framework (OECD, 2023)

The use of sustainable transport modes (walking, cycling and public transport) in Cork City is increasing. In 2022, these modes accounted for 29% of the total trips made to work, school, college or childcare made in the city. Modal share for travel to work, college or school across the Cork Metropolitan Area differs greatly further away from the city centre. Residents of the urban core are over five times more likely to walk or cycle to work/college/school than residents of the wider metropolitan area. Public transport use remains relatively low across the Cork Metropolitan Area (8% - 18%), being less than half the rate of public transport use in Co. Dublin.

⁴ Excluding the Docklands area.

Figure 2: Modal share of travel in the Cork MASP area (Source: Census 2022).



These trends highlight the importance of delivering key transport infrastructure focused on active travel and public transport. BusConnects Cork is at an advanced planning phase. Major progress has been made on the Cork Commuter Rail programme, with work underway on Phase 1 and funding committed for Phase 2. Further investment in key transport infrastructure projects including Active travel schemes and the Northern Distributor Multimodal Route will be key to increasing the usage of sustainable transport modes across the wider metropolitan area.

These modal share trends demonstrate the critical importance of delivering new residential development in the right locations that enables compact growth, the 15-minute City and TOD. An interconnected Cork Light Rail Transport (LRT) system will be critical in increasing the use of sustainable transport modes across the city. A greater commitment to this project in the National Development Plan will ensure more timely delivery, while having a transformative impact on the sustainable economic development of Cork.

2.4. A Strong Economy

Cork is home to strategically important employment clusters, including 194 multinational firms currently operating across sectors such as pharmaceuticals, technology, cybersecurity and financial services. These multinationals currently employ over 51,000 people in the South West, of which Cork is the hub.⁵ In 2021, 457 SMEs were supported by Enterprise Ireland in Cork City and County, employing a further 24,962 people.

In recognition of these trend, Cork City was recently named No.2 Small European City for economic potential in the Financial Times European Cities of the Future Awards 2024⁶. Employment opportunities continue to grow with several large scale employment schemes in the planning pipeline, including an extension to Apple’s European Headquarters in Holyhill (+1,300 jobs), new office space at Penrose Dock and Horgan’s Quay (+51,000 sq. m.) and a new business school for UCC (+4,000 students and +180 staff). In the medium to long term, there is significant scope for additional strategic commercial clusters, including the Docklands, Cork Science and Technology Park and Mahon Business

⁵ Source: [IDA-Annual-Report-2023-PDF.pdf \(idaireland.com\)](https://www.idaireland.com/annual-report-2023)

⁶ <https://www.fdiintelligence.com/content/rankings-and-awards/european-cities-and-regions-of-the-future-2024-the-winners-83483> Note: Limerick, Galway and Waterford ranked in the micro-cities category

Park. Cork City is increasingly being acknowledged as holding a unique position in Ireland, “*emerging as an exemplar of economic success*”⁷.

Cork City’s two universities, University College Cork (UCC) and Munster Technological University (MTU), are currently home to +35,000 students. As a leading member of the Global Network of Learning Cities, Cork is continuing to further develop as a UNESCO Learning City through ongoing engagement with its Institute of Lifelong Learning.

2.5. Scale and Connectivity

Cork City is increasingly recognised as an emerging European Second City, comparable to Malmö, Bilbao, Aarhus and Bremerhaven in terms of scale and function. The NPF seeks to enhance this status by setting out ambitious growth targets reflecting the city’s critical role in enhancing Ireland’s regional profile. To effectively fulfil this role, the NPF requires the city to have an ambitious vision that maximises its potential as an internationally competitive and sustainable city in a best practice European context.

As an EU Mission City, Cork City is one of the 100 Climate Neutral and Smart Cities committed to significantly accelerating the delivery of the European Green Deal. As a co-founding member of the Irish Network of Learning Cities (INLC) Cork continues to be a regional leader, supporting Waterford’s application to UNESCO to join the Global Network of Learning Cities in 2023.

Cork Airport is Ireland’s second largest international airport. In 2023 the airport enjoyed its busiest year for passenger traffic in its history, accommodating 2.8 million travelling passengers. This was a +25% increase on 2022 levels (2.24 million). Cork Harbour is one of only two ports in Ireland capable of handling all six modes of port traffic. It is home to the second largest Lift-on Lift-off (LoLo) port, handling over 20% of all LoLo trade in Ireland. Some 10 million tonnes of trade passed through the Port of Cork in 2022, reflecting Ireland’s strong economic growth⁸. The Port of Cork is also home to Ireland’s only dedicated cruise terminal with 113 cruise ships scheduled to visit in 2023.

2.6. Climate Transition

Cork City is a designated EU Mission City. The Cities Mission includes national, regional and local stakeholders, businesses and citizens and seeks to accelerate delivery of the European Green Deal. The emission rates of greenhouse gases within Cork City have been mapped, with annual emissions reaching nearly 1 million tonnes. The two highest contributors were identified as the transport and residential sectors⁹.

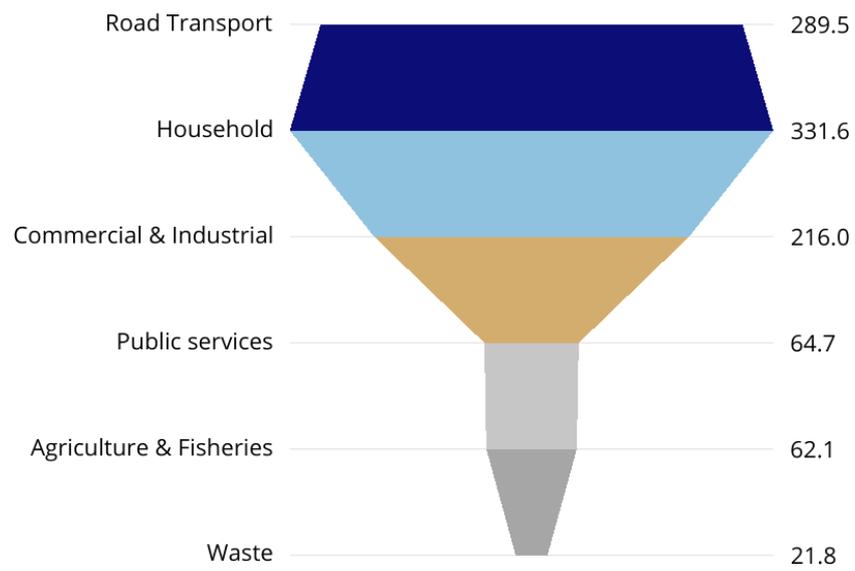
The Cork City Climate Action Plan, adopted in 2023, sets out a series of citywide actions to achieve the vision of a climate neutral, resilient, just, healthy and thriving city. A Decarbonising Zone (DZ) has recently been designated in the city incorporating a broad mix of buildings, businesses, institutions, and communities within a 5 km sq. area with a population of +14,000 residents.

⁷ Marie Ryan, Lisa Noonan, Eleanor Doyle, Denis Linehan, Cork City, Ireland: A blueprint for transformation in second-tier urban centres, *Cities*, Volume 153, 2024, 105289, <https://doi.org/10.1016/j.cities.2024.105289>.

⁸ Port of Cork Masterplan 2050: <https://www.portofcork.ie/wp-content/uploads/2023/05/Port-of-Cork-Masterplan-2050-Final-E-mail.pdf>

⁹ Baseline Emissions Inventory, 2033. <https://publications.corkcity.ie/view/803534487/>

Figure 3: Cork City baseline emissions inventory co₂-eq (ktonnes), 2018. (Source: MaREI, UCC)



3. Development Trends

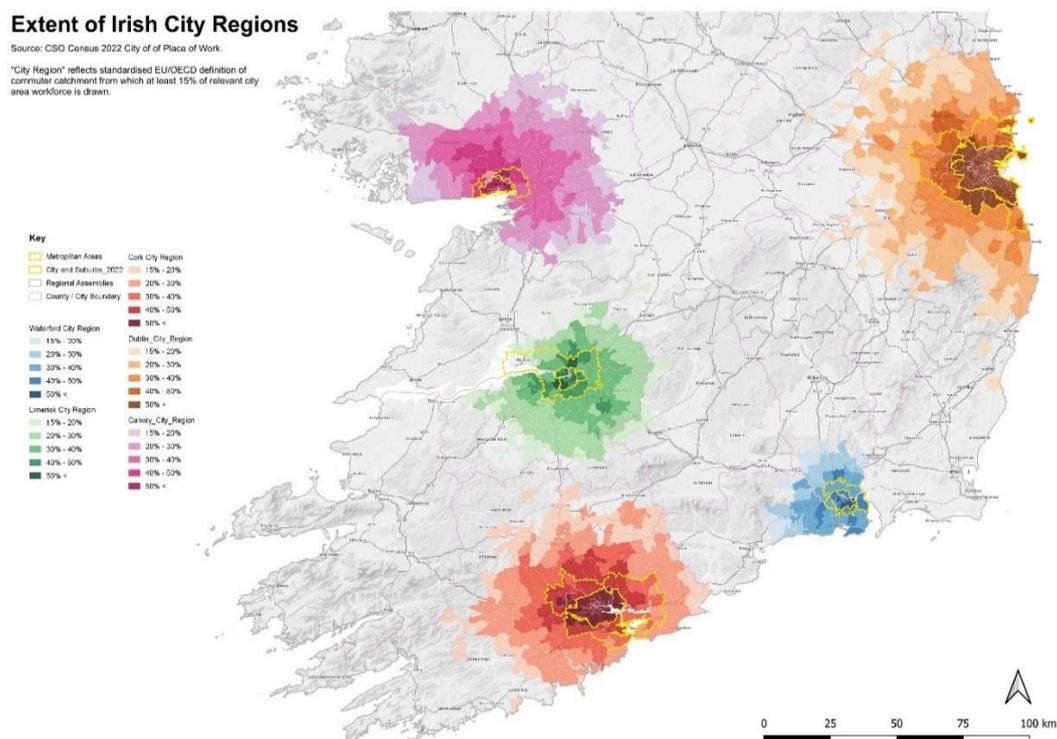
Recent development trends in Cork show both positive indicators and key challenges in delivering the growth targets and objectives for regional rebalancing envisaged under the NPF. A better understanding of these indicators and challenges presents an opportunity for the First Review of the NPF to consider new actions and targets that can increase the rate of NPF delivery in Cork City.

3.1 Emerging European Second City

European cities are home to a considerable share of Europe's total population¹⁰ and overall economic activity¹¹. To help compare the influence of cities, the OECD assesses areas economically connected through workplace commuting. This assessment uses population density and travel-to-work flows as two key indicators of influence. The CSO has recently applied this OECD definition in an Irish context to demonstrate the extent of influence Cork is having on its surrounding area. As the map below illustrates, this influence is most comparable to Dublin in terms of both scale and intensity. As previously discussed, Dublin has significantly lower levels of private car use and significantly higher levels of public transport use.

Given the comparative rate of future NPF growth identified for Cork (+40%), compared to Dublin (+25%), and given National CAP targets for transport use, sustainable growth can only be achieved through a major programme of targeted infrastructure investment. Without this targeted transport, housing, community and employment-related infrastructure, the scale of growth will either not occur in Cork, or will create unsustainable patterns of growth that negatively impact climate transition.

Figure 4: The extent of Irish City-Regions (source: CSO)



Cork continues to have a proven track record as an engaged partner in European-funded projects. These projects help advance Cork's collective knowledge of international best practice, while promoting transnational collaboration that accelerates social, economic and spatial innovation activities in a sustainable way. Cork is currently involved in several EU projects focused on climate

¹⁰ 72% of the EU's population live in cities/urban areas ([Europe and its Urban Development, EIB report, 2020](#))

¹¹ Employment in European cities grew by 7%, between 2000-2020, while declining in the rest of the EU ([Europe and its Urban Development, EIB report, 2020](#))

change, green cities, smart cities, social innovation and engagement, energy efficiency and tourism. Some of the most relevant current EU funded projects in Cork City include:

Figure 5: EU funded Projects in Cork City (source: Cork City Council)



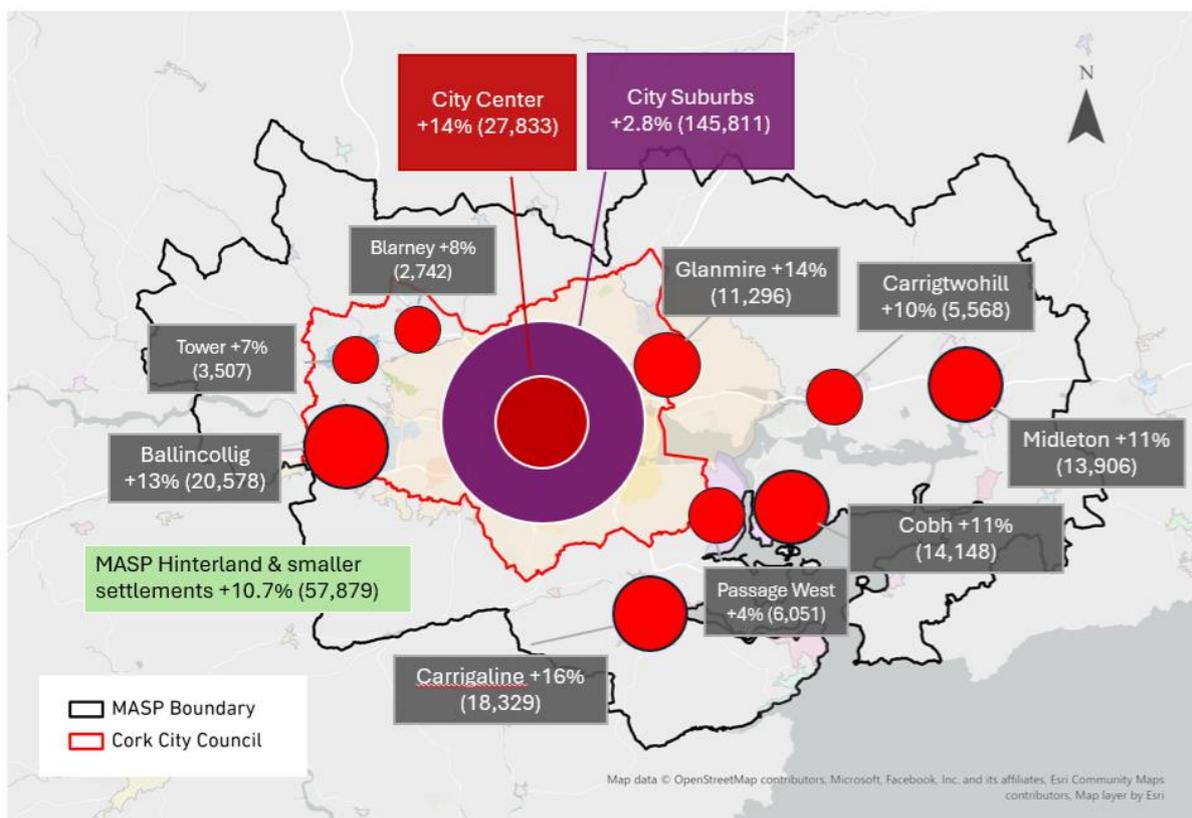
Examples of current EU-funded projects in Cork

- Climate-neutral & Smart Cities Mission
- Restoring our Oceans & Waters Mission
- Mission on Adaptation to Climate Change
- Reachout (Horizon 2020)
- MiniStor (Horizon 2020)
- FEEL (Interreg)
- Zero Carbon Infrastructure (Interreg)
- EMBRACER (Interreg)
- SEFIT (ERAZMUS +)
- Intelligent Cities Challenge 2.0
- GreenInCities (Horizon Europe)
- TIPS4PED (Horizon Europe)
- GoGreenNext (Horizon Europe)
- GreenDense (Interreg)
- Upcycling Trust (Interreg)

3.2 Urban Growth

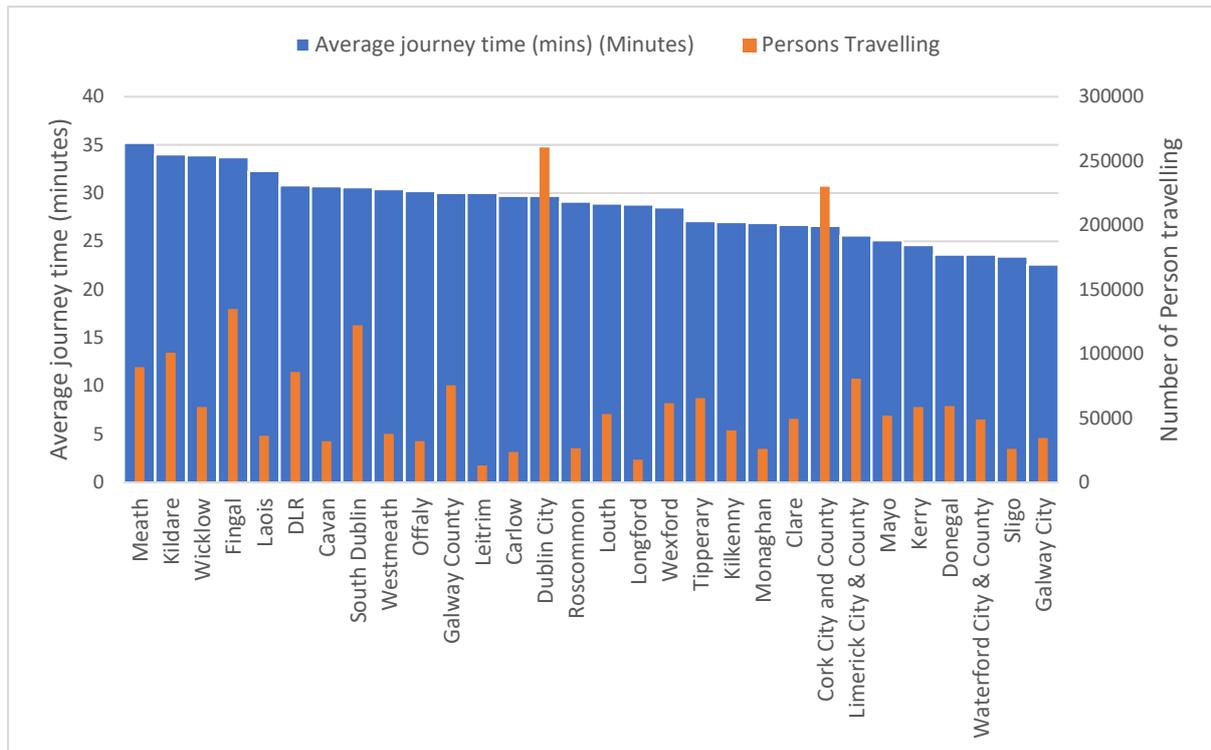
The Cork Metropolitan Area is growing. This growth is notable for the increasing numbers of people living in central urban areas. The city centre continues to experience very positive rates of growth (+14%). The urban towns of Ballincollig, Glanmire and Carrigaline are also experiencing notable rates of growth (13% – 16%). These growth patterns show the importance of the City’s strategic land banks including Cork City Docklands and within the city suburbs, and the need for increased infrastructural investment to unlock their TOD-led growth potential.

Figure 6: Population Growth in the Cork Metropolitan Area 2016 – 2022 (Source data: Census 2022)



With an average journey time of 26.6 minutes, commuting times in Cork City and County are some of the lowest nationally. Census 2022 results show how the average travel time at the national level continued to climb, up from 26.6 minutes (2011) to 29.1 minutes (2022). As shown in the graphic above, given the scale of the working population commuting in Cork (230,023 people), increased investment in sustainable transport infrastructure can be the key enabler for delivering of national and regional sustainable compact growth.

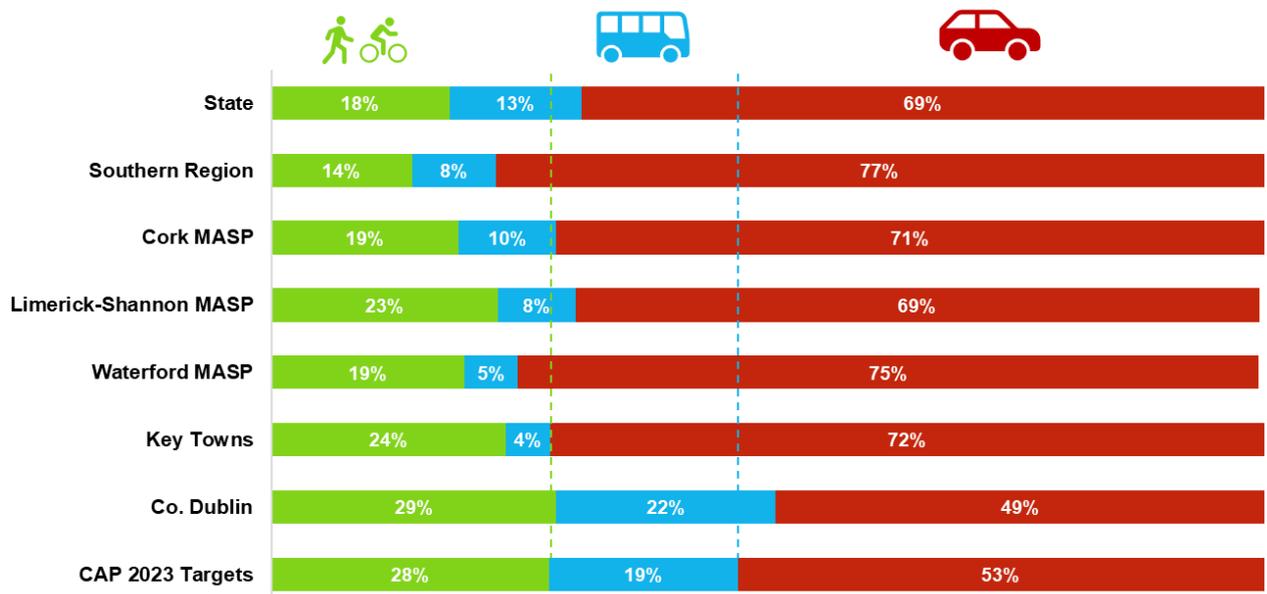
Figure 7: Travelling time of persons usually resident and present in the state, 2022. (Source: CSO).



3.3 Planning for Transport Orientated Development (TOD)

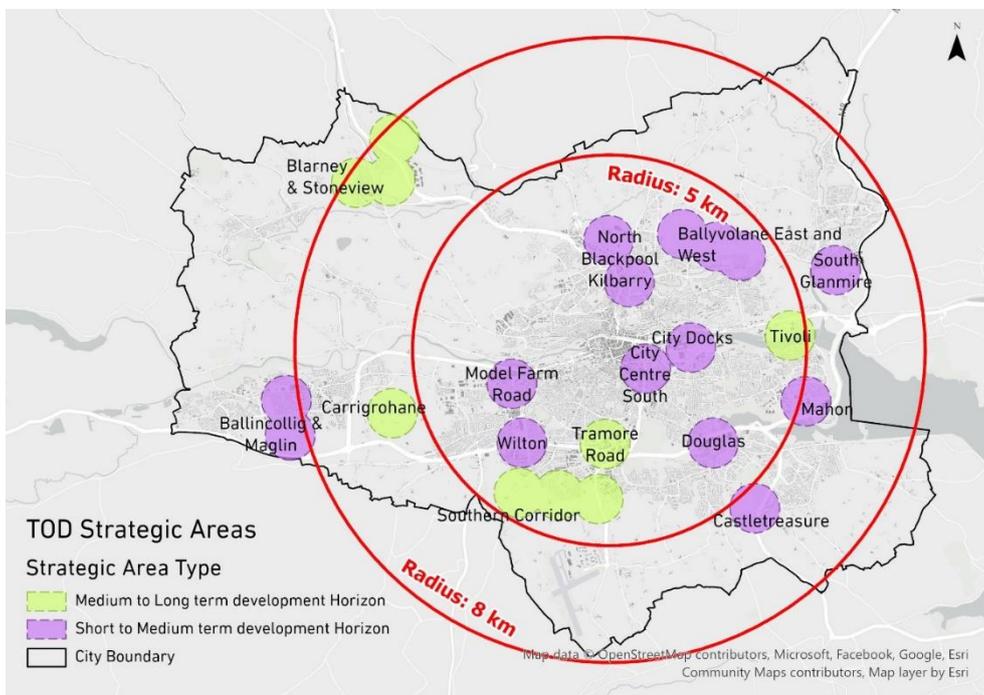
Current carbon emission rates from the residential and transport sectors in Cork City mean delivering TOD will be critical in delivering climate transition within the city. Carbon emission rates from transport within the Cork MASP also remain high. Census 2022 data shows how rates of walking, cycling and public transport usage are below the National CAP 2023 targets.

Figure 9: Modal Share of Travel to School, College or Work 2022 (Source: Census 2022).



The planning and delivery of TOD within Cork MASP is underway. In planning for the delivery of compact growth up to 2040, Cork City Council has identified lands for future strategic TOD¹². These lands are highly accessible to existing/planned transport infrastructure, under CMATS 2040, and incorporate clusters of underutilised sites including brownfield, windfall, underutilised and greenfield lands within strategic expansion areas. Overall, these TOD lands have the potential to deliver 60,000-100,000 new homes at medium density (80 UPH) on 1,500 ha of land within 0-8km from the city centre.

Figure 8: Delivering TOD in Cork City (Source: Cork City Council)



¹² Opportunities for Transport Oriented Development in Major Urban Centres, Submission from Cork City Council to the Department of Transport and Department of Housing, Local Government and Heritage, May 2023.

There are sufficient lands designated in the Cork City Development Plan 2022-2028 to deliver TOD in the right places and at scale. With 645 hectares of lands zoned for new residential (Tier 1 and 2), the City Plan designates three city regeneration areas and seven strategic expansion areas. These zoned lands have capacity to accommodate +32,000 new residential units.

While the capacity to deliver TOD is available, there is a need to refocus attention on how best to deliver this. Cork City Council's latest Residential Monitor (June 2024) sets out the current status of residential units within the city's planning system. The results from the monitor show how post planning delivery remains a challenge. Currently there are 11,700 units with live planning permissions, of which 8,500 units have commencement notices. There are an additional 3,046 units pending planning permission and a further 3,226 units yet to commence construction.

3.4 Cork City Docklands

At 147 hectares Cork City Docklands is the largest brownfield regeneration project in Ireland. When completed, the Docklands will house +20,000 residents and accommodate +25,000 jobs. Significant progress has been made over the last number of years, with over 100,000m² of commercial space already delivered accommodating +6,000 jobs. To date planning has been granted for 3,198 new units within an additional 1,004 units in the planning pipeline. Commencement Notices have been received for 1,304 units and 302 units are under construction. Funding is provided by the Exchequer, primarily through the URDF with support from other housing and transport funds. This multi-annual government investment is projected to deliver up to €5.1bn in private sector investment in Cork Docklands.

Cork Docklands will be at the forefront of the transition to a carbon neutral and climate resilient city. The regeneration of the Docklands will deliver compact growth by allowing 75% of its residents and workers journeys to be made by active travel or public transport. The infrastructure invested in the Docklands will directly impact the city and wider metropolitan area with additional windfall impacts in attracting new population, employment and investment opportunities for the wider region and country. Delivery of Cork City Docklands is crucial for implementing the National Climate Action Plan and will contribute directly to delivering seven of the ten NSO's set out in the NPF.

Cork Dockland's will be an international exemplar of brownfield regeneration, showcasing world-class placemaking, public amenities, enhanced public transport and active travel infrastructure necessary to support high-density residential development adjacent to the city centre. Investment in drainage and flood mitigation infrastructure will also facilitate sustainable development and climate resilience in the surrounding urban area, in line with compact growth.

The Docklands project aims to promote modal switch away from car usage to public transport and active travel alternatives. This will be achieved through the delivery of enabling infrastructure that prioritises public transport and active travel within a compact urban environment where sustainable travel modes are naturally more attractive. The continued delivery of Cork Docklands is also essential for meeting the higher density targets set out in the DHLGH's "*Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities.*"

3.5 Strategic Competitive Clusters

The Cork Metropolitan Area is the main service centre for the Southern Region, accommodating significant national level health, educational and cultural institutions. It also plays host to an internationally significant pharma and bio-pharma sector with increasingly strong energy, maritime and agri-food clusters. Cork's innovative eco-system links citizens, the public sector, academia and industry together to solve key issues and create a better quality of life for its citizens. With a strong track record in starting and growing innovative and internationally focussed Irish startups, Cork is now home to a group of growing commercial clusters.¹³ The NPF and Cork MASP identify the need to continue to develop key employment sites in Cork, including the Docklands, Cork Science and

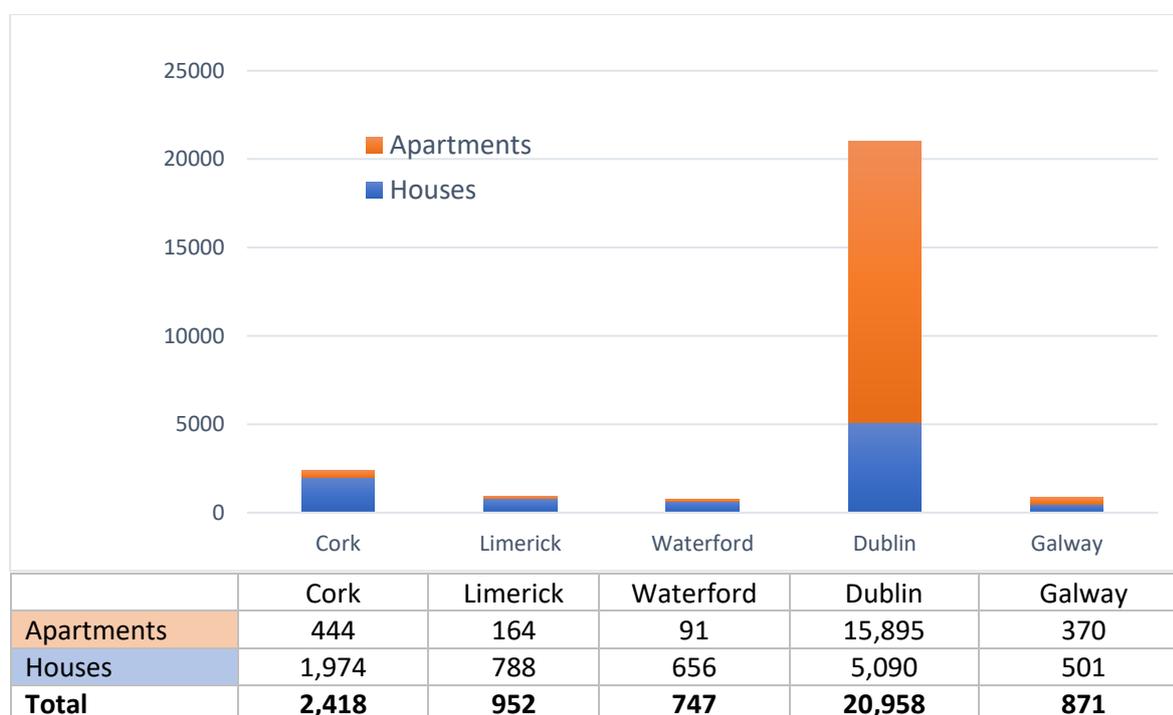
¹³ For example; Voxpro; Teamwork; Trustev; Crest Solutions, Practice Evole, Aspira Qumas

Technology Park and Mahon. The Cork City Development Plan 2022-2028 designates new Strategic Employment locations¹⁴ that provide +200ha of future employment land to support continued economic growth. Increased production and delivery of renewable electricity is an important element in being net zero by 2050. A group of Cork-based organisations¹⁵ has recently come together to establish a Celtic Hydrogen Cluster to deploy green hydrogen infrastructure in the Cork Region. The support and progression of further such actions will be critical in achieving Climate Transition in the region.

3.6 Delivering Growth at Scale

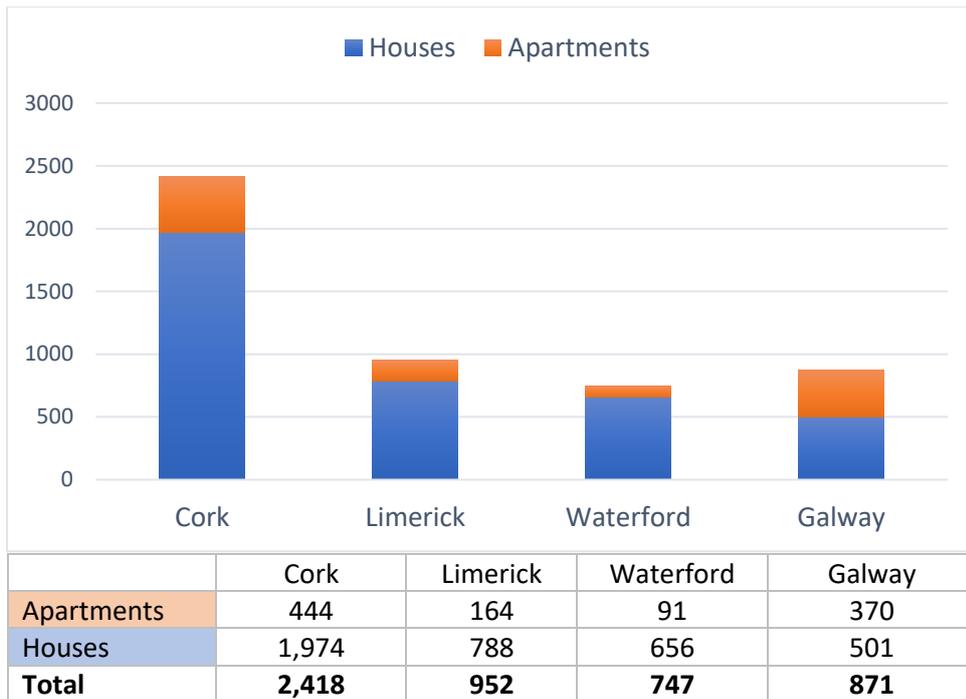
According to CSO figures, 80% of all new dwellings completed in Ireland between 2021-2023 are located within the five cities. A total of 16,964 apartments were completed across the five cities during this period, with 94% delivered in Dublin and 3% in Cork. These trends highlight the major challenges arising from lack of private apartment delivery in Cork City and other regional cities.

Figure 10: Housing Completions in Ireland’s Five Cities 2021-2023 (Source: CSO)



¹⁴ Based on the findings of the [Cork Strategic Employment Locations Study \(2021\)](#).

¹⁵ Port of Cork, ESB, GNI, Irving Oil, Bord Gáis Energy and Simply Blue Group



The lack of apartment delivery within Cork Metropolitan Area is negatively impacting population growth targets. With the NPF targets now one-third of the way through their life cycle, the remaining period offers a significant opportunity for increased alignment between national objectives and local investment and delivery. For Cork, this time period is critical in realising its role as a regional driver and delivering the key enablers to achieve the scale of regional, metropolitan and city growth required to achieve balanced regional growth.

4. Building on Strategic Opportunities

This submission highlights recent progress made in Cork City's continuing ambition to implement the NPF 2040. Both positive and challenging indicators are presented to help support an increased rate of implementation that achieves the NPF's aim for greater regional balance. This section focuses on additional strategic opportunities in Cork that can help better inform the First Revision of the NPF and advance the overall ambitions of Project Ireland 2040.

It is recommended that the following strategic opportunities for Cork City and Metropolitan Area be added to the existing "*Key future growth enablers for Cork*" section (p.45 of the First Revisions). It is also requested that the layout of this page be revised as a full bespoke page (as per Limerick, Galway and Dublin versions):

European Second City of Scale

To further enhance Cork City's position as an emerging European Second City of scale through its continued growth as an internationally competitive and sustainable city.

Building on Cork MASPs Competitive Clusters

Further enhance Cork's diverse economic base, by building on sectoral clusters in Cork Harbour and the increasingly strong energy, maritime and agri-food clusters in the wider Metropolitan Area. Continue to support the enhancement of the area's strong track record in starting and growing innovative, internationally focused Irish startups.

EU Mission Cities

As one of Europe's 100 Climate Neutral and Smart Cities (EU's 'Cities Mission'), support Cork City's accelerated reduction of emissions. A new "EU Mission Cities" case study should be included in section 9.1 or section 9.2 to highlight the importance of climate transition in an Irish city context.

Delivery of TOD in Cork MASP

Support future strategic TOD delivery of scale within the Cork Metropolitan Area, in suitable locations that are highly accessible by strategic transport infrastructure and that deliver compact growth.

Planning for LRT Delivery

Support the identification and protection of the Cork Light Rail Transit (LRT) route to enable integrated transport and land use planning, urban consolidation and the delivery of strategic regeneration, place-making and public realm improvements.

Delivery of Renewable Energy

Support the planning and delivery of sustainable renewable energy production, connectivity and supply that decarbonises the region including offshore renewables (e.g. DMAPs programme) and the Celtic Interconnector.

This submission sets out how future growth within the Cork Metropolitan Area is reliant on the successful planning, investment and delivery of key infrastructure that unlocks strategic growth areas (refer to appendix 2). Given the importance of this infrastructure, it the following updates should be referred to within Section 3.4, within the revised NSO's (p.154 – 171) and other relevant sections of the First Revision of the NPF:

BusConnect Cork

Delivery of BusConnect Cork will serve the needs of the metropolitan area by carrying significantly increased passenger numbers. Finalisation of the network design is a key step in delivering a modal shift that enables more sustainable compact growth, including future delivery of higher density residential, employment and community infrastructure.

Cork Commuter Rail Network (Phase 2)

The transformation of the Cork commuter rail network will be transformative for the metropolitan area in enabling compact growth opportunities for living and working. The investment into Kent Station and the delivery of new stations will be catalysts for unlocking strategic landbanks in North

Blackpool, Kilbarry, Blarney and Tivoli and connecting new strategic commercial clusters in the area.

Cork Light Rail Transit (LRT)

The identification and protection of a route for the Cork City LRT project, will enable better planning and consolidation of lands within the city and in particular the central corridor including the City Centre, Docklands, Cork Science and Innovation Park and the strategic land bank between Ballincollig and the west of the city.

Cork Wastewater Strategy (Uisce Éireann)

The finalisation and implementation of this new 50-year strategy will form a critical element in realising future wastewater infrastructure investment within Cork Metropolitan Area. The strategy will be key to enabling future population and economic growth, environmental management and climate change targeted under the NPF.

M28 Cork – Ringaskiddy

The delivery of the M28 is required to enable sufficient port capacity in Cork to be relocated to the lower harbour, thereby unlocking the regeneration of both Cork City Docklands the Tivoli Docklands.

Cork City Northern Distributor Multimodal Route (NDMMR)

The NDMMR is key to providing an urban connection in the north of the city. The route will facilitate transport and active travel across three strategic expansion areas and two new planned employment centres. Cumulatively this will connect large portions of existing residential and employment areas in Cork City and unlock significant new residential, community and commercial lands designated for growth.

Cork City Northern Transport Project (CCNTP)

The CCNTP will provide a strategic transport solution to link existing with the existing radial national road network. The project will enable all strategic traffic to travel around the city to access the destinations such as the Port of Cork and Cork Airport as well as other regional destinations. Removing this traffic from the city centre will free up capacity on existing road infrastructure, enabling design and delivery of additional public transport and pedestrian and cycle infrastructure.

Cork City Southern Distributor Multimodal Route (SDMMR)

The SDMMR will be key in providing an urban connection across the south of the city, facilitating transport and active travel across future long-term expansion areas. Cumulatively this will connect large portions of existing and future residential areas and unlock significant new residential, community and commercial lands.

Maglin Distributor Road (Ballincollig):

The development of the Maglin/South Ballincollig area is dependent on the design and delivery of a new distributor road connected to hierarchy of new streets. This will unlock strategic landbanks in South Ballincollig and connect large portions of existing residential and employment areas to new residential, community and commercial lands in the area.

Cork Drainage and Flood Mitigation Infrastructure

Key city drainage and flood relief infrastructure projects, such as the Lower Lee Flood Relief Scheme, Morrisons Islands flood defence and Blackpool flood relief schemes are currently at various stages of design, planning and delivery. These schemes will be critical in resolving Cork's flooding issues and in the regeneration of the Docklands and other underutilised city areas.

Social, Educational and Community Infrastructure in Cork

Ongoing investment of social, educational and community infrastructure is underway including Cork University Business School (€ 106 mill.), and Crawford Art Gallery (€ 30 mill.). Further catalyst investment will be required to support growth in Cork. Additional support and funding for sports,

recreational space, parks and public realm are required to provide attractive environment within the compact growth in the Cork Metropolitan Area. Two new large-scale city parks are currently being planned in the north of the City, which will be transformative for communities living in the northern suburbs and surrounding areas.

Investment in Urban Regeneration

While new initiatives such as *Croi Conaithe* (Cities) and Project *Tosaigh*, are welcomed, there is an increased emphasis needed on the scale of regeneration to be undertaken in Cork City Centre. The ongoing €61 million investment in the Grand Parade Quarter will be critical to rejuvenate the city centre and generate private investment. Similar regeneration projects need to be planned and funded in other city neighbourhoods to deliver compact liveable growth.

5. Accelerating NPF 2040 Delivery in Cork

The need for a longer transition to deliver the NPF growth scenario is now clear. The First Revision of the NPF offers a timely opportunity to respond to these slower transition rates by introducing new actions designed to reinforce and accelerate delivery at regional and local levels.

The NPF currently supports the sustainable development of Cork City, Metropolitan Area and County with ambitious growth targets recognising the significant capacity of Cork to contribute towards more balanced development in the State. In particular, Cork City and the Cork Metropolitan Area are identified to be more significantly scaled and compact, acting as the driver for the southern region and effectively complementing the economic strength of Dublin.

It is critical that the NPF review continues to support Cork City, Metropolitan Area and County by increasing commitments to and alignment with national funding and implementation priorities that can realise Cork's potential and its intended role in the NPF. In order to achieve sustainable and accelerated compact growth and a stronger Cork City, Metropolitan Area and County, the First Revision of the NPF should include the following:

Apply the ESRI's Maximum Migration Scenario

The updated ESRI population projections set out in the "*Regional Demographic and Structural Housing Demand Research Report (2024)*" refer to a high migration scenario. Based on the Census 2022 results and current migration, headship and obsolescence trends, this high migration scenario (6.3m people in Ireland by 2040) should be used as a more robust planning target for 2040, with its application in the MASP prioritised. This highlighted the need for additional measures to ensure that the objectives of balanced regional development can be achieved.

Reinstate NPF Ambitions for Growth in Cork

Given the NPF's overall ambitions to deliver growth in Cork City, the First Revision of the NPF sets out new targets for Cork City and suburbs (Table 4.1) that are primarily based on continuing population trends (2016-2022) and overly reserved. Given the findings of the "*Report of the Housing Commission (May 2024)*", including the significance of pent-up housing demand, the proposed revisions should reinforce future ambitions for Cork City and Metropolitan Area by increasing its targeted growth. Given the overall ambition for growth in Cork City set out in the NPF, the original target for +125,000 persons by 2040 should be reinstated as a minimum. Adding an increase to this original target would demonstrate additional and justifiable support in reinforcing the critical outcomes of compact growth, enhanced regional accessibility and sustainable mobility set out in the NPF's NSO's.

Increased Focus on Infrastructure Investment and Delivery

Growth in Cork is directly linked to the current and future investment plans of infrastructure and utility providers. Information sharing is critical to ensure future investment plans build reflect the relevant land use plans (please refer to appendix 2). Several infrastructure projects in the Cork MASP area are currently required to unlock strategic lands for residential, community and employment use. To help remove barriers to NPF delivery, local investment priorities that align with regional and national plans need greater integration with the investment arms of the NPF (i.e. the NDP, the PI 2040 Delivery Board and all relevant infrastructural investment strategies and programmes). This investment should be fully funded.

Increased Focus on Active Land Management

Increasing Active Land Management resources at local level will better align public/private actors, infrastructure delivery, project level funding and housing delivery at scale. Cork City Council is currently actively engaging with landowners and developers to unlock lands that can accommodate approximately 20,000 homes. This can be expanded with increased resourcing. In addition, supporting tools for local land acquisition and activation that benefit the ongoing legislative changes are needed. Improving feedback loops will ensure local stakeholders charged with delivering the NPF, more regularly connect and report on-going implementation issues.

Increase Focus on the findings of the OECD Report

The OECD Report '*Towards Balanced Regional Attractiveness in Ireland: Enhancing the Delivery of the National Planning Framework*' (2023) explores existing institutional and governance arrangements in Ireland, making recommendations to support NPF delivery. One of the key observations is that governance and institutional arrangements need to be adapted to support a move away from 'business as usual'. The First Revision acknowledges that these recommendations go beyond its scope but are relevant and will need to be considered in parallel. The NPF revision would benefit from adding further detail in this regard.

Key Findings from National Investment Office Report

The NPF revision would benefit from referencing some of the key findings from the Department of Public Expenditure and Reform National Investment Office Report "*Assessing the Alignment of the National Planning Framework and National Development Plan*" (2021), including:

- Acknowledging that aligning investment plans with any new spatial strategy takes time.
- Project selection processes are required for Ireland's regional cities to grow in line with NPF targets.
- Ensuring Government Departments or agencies increase their explicit focus on enabling specific levels of growth within the cities of Cork, Galway, Limerick and Waterford.
- Proposals for the establishment of Project Ireland 2040 City Delivery Boards to drive investment in line with the NPF targets.
- New sectoral investment strategies at department level that reflect and reference the specific regional, city and compact growth targets set out in the NPF as soon as practicable
- New standardised departmental project selection criteria where not already in place. Where possible Departments should seek to include alignment with the regional, city and compact growth targets as a criteria in the selection of investments.
- Departments which have larger demand-led investment programmes should monitor the share of investment for each of the three regional assemblies and five cities.

Revised Funding Approach

Balanced NPF funding delivery should enable diverse opportunities in our regions. As such, there should be a more effective delivery mechanism to advance the development of metropolitan areas in accordance with national policy. In line with the findings of the National Investment Office report (see above), a mechanism should be applied to ensure sectoral investment is weighted in favour of achieving NPO's 1-4 of the NPF. The establishment of dedicated long-term budgeting mechanism (10-year strategic fund) to drive the achievement of the accelerated growth in Metropolitan Areas should be considered. This should be fully resourced, to ensure that Government policies can be delivered.

Climate Transition and Mission Cities

The latest climate reports show the need for greater urgency in delivering local climate adaptation measures that tackle sea level rise, increased temperature rise, extreme weather events and the changing patterns of precipitation. The increased reference to Climate Transition in the NPF revision is supported. Given Cork City's status as an EU Mission City there is an opportunity for the revision to include further details on the city's role in addressing climate change by supporting transport oriented sustainable development, prioritising flood protection and investment in renewable energy. Importantly, the Town Centre First policies and compact growth objective should be underpinned by a programme of building retrofit, to ensure that the existing building stock remains occupied as businesses come under increasing pressure to reduce their emissions by ensuring that their buildings are energy efficient. There is some evidence that businesses are moving from older building stock in the city centre to more energy efficient buildings, making the city centre vulnerable to increased vacancy of commercial property. .

Increased Support for TOD in Cork MASP

The increased reference to the importance of TOD in the NPF revision is supported. To further support this objective, the revision should reference ambitious targets for delivering TOD in Cork Metropolitan Area up to 2040. Investment in TOD will support accelerated delivery of housing and neighbourhoods throughout Cork Metropolitan Area. This should include the need for investment of key enabling infrastructure. Additional support and funding are also needed for Active Travel programmes, to ensure delivery of a robust and integrated transport network within Cork Metropolitan Area.

Appendices

Appendix 1: Feedback on Tracked Changes to the NPF

Appendix 2: Infrastructural Requirements for Key Growth Areas in Cork MASP

Appendix 1: Feedback on Tracked Changes to the NPF

Cork City Council is generally supportive of the changes proposed to the NPF. Comments and proposed modifications to specific amendments to the NPF are set out in Table 1 below. Additional comments are provided in Table 2.

Table 1: Feedback on Tracked Changes to the NPF		
<i>National Planning Framework 2018</i>	<i>Draft Revised National Planning Framework 2024</i>	<i>Feedback</i>
<p>National Policy Objective 1b</p> <ul style="list-style-type: none"> ○ Eastern and Midland Region: 490,000 - 540,000 additional people i.e. a population of around 2.85 million; ○ Northern and Western Region: 160,000 - 180,000 additional people i.e. a population of just over 1 million; ○ Southern Region: 340,000 - 380,000 additional people i.e. a population of almost 2 million. 	<p>National Policy Objective 3</p> <ul style="list-style-type: none"> ● <i>Eastern and Midland Region: approximately 470,000 additional people between 2022 and 2040 (c. 690,000 additional people over 2016-2040) i.e. a population of almost 3 million</i> ● <i>Northern and Western Region: approximately 150,000 additional people between 2022 and 2040 (c. 210,000 additional people over 2016-2040) i.e. a population of just over 1 million;</i> ● <i>Southern Region: approximately 330,000 additional people over 2022 levels (c. 450,000 additional people over 2016-2040) i.e. a population of just over 2 million.</i> 	<p>While the delivery of policies that affect a change in development cycles takes time (10-15 years), the revised targets are being proposed a third of the way through the NPF 2040 cycle (2016 being the baseline year).</p> <p>The revisions reflect the continuing trend (2016-2022) of no major shift in regional balance. Given the findings from the Report of the Housing Commission (May 2024), including the significance of pent-up housing demand, the proposed revisions should reinforce future ambitions for the regions and Cork Metropolitan Area in particular, by transferring the metro and regional targets yet to be achieved. This increased target will reinforce critical outcomes of compact growth, enhanced regional accessibility and sustainable mobility set out in the NSO's.</p>
<p><i>new page 21</i></p>	<p><i>In order to understand compact growth trends, development must be monitored across cities and towns in a consistent way. A new approach to monitoring urban growth will be developed, focussing on the built-up footprint of existing settlements comprising areas that are subject to existing urban land uses and the additional 'land take' associated with development</i></p>	<p>Support this approach and welcome early engagement with Local Authorities to establish their role in the development of this tool and its implementation at local level.</p>

Table 1: Feedback on Tracked Changes to the NPF		
National Planning Framework 2018	Draft Revised National Planning Framework 2024	Feedback
	<i>outside of the built-up footprint. A tool is being developed to track and compare urban development trends across the main urban settlements.</i>	
<i>new</i>	(* Footnote 12 to NPO 7 regarding 'built-up areas') 12 This objective relates to all 'built up areas' as defined by CSO. For the purposes of NPO 7, 8 and 9 the built- up footprint is defined as the area given over to urban land uses (i.e. artificial surfaces relating to urban land uses). The built-up footprint shall be clearly defined for each settlement on the land-use zoning map as part of the statutory plan making process.	Welcome this clarification but seek further clarification around the application of the CSO's definition of the "built up area" (BUA's) which does not translate to administrative areas for Cork City Council and Cork County Councils. This will cause issues in relation to the administration of all related growth targets.
<i>new</i>	National Policy Objective 10 <i>Deliver Transport Orientated Development (TOD) at scale at suitable locations, served by high capacity public transport and located within or adjacent to the built up area of the five cities or a metropolitan town.</i>	Support this new NPO as being critical in delivering many of the ambitions of the NPF. Cork City and the Cork Metropolitan Area are in a strong position to deliver TOD in the short, medium and long term and are working with DHLGH and DoT in a strategic approach to planning for TOD in these areas.
Table 2.1 The NPF at a Glance: Targeted Pattern of Growth, 2040 <ul style="list-style-type: none"> ○ Eastern and Midland, 2.85m people total ○ Southern region, 2m people total ○ Northern and Western, 1m people total ○ Dublin City & Suburbs, at least 1.41m total ○ Cork City & Suburbs, at least 315K total ○ Limerick City & Suburbs, at least 145K total 	Table 2.1 The NPF at a Glance: Targeted Pattern of Growth, 2022 to 2040 <ul style="list-style-type: none"> ○ Eastern and Midland, 3m people total ○ Southern region, 2m people total ○ Northern and Western, 1m people total ○ Dublin City & Suburbs, at least 1.56m total ○ Cork City & Suburbs, at least 320K total ○ Limerick City & Suburbs, at least 150K total ○ Waterford City & Suburbs, at least 88K total ○ Galway City & Suburbs, at least 122K total 	The revisions reflect the continuing trend (2016-2022) of no major shift in regional balance, even increasing the population projection for the Eastern and Midland region compared to the others. Given the findings from the Report of the Housing Commission (May 2024), including the significance of pent-up housing demand, the proposed revisions should reinforce future ambitions for the regions and Cork City and suburbs in particular, by increasing the targeted growth. This will reinforce critical outcomes of sustainable compact growth, enhanced regional

Table 1: Feedback on Tracked Changes to the NPF

<i>National Planning Framework 2018</i>	<i>Draft Revised National Planning Framework 2024</i>	<i>Feedback</i>
<ul style="list-style-type: none"> ○ Waterford City & Suburbs, at least 85K total ○ Galway City & Suburbs, at least 120K total 		accessibility and sustainable mobility set out in the NSO's.
<i>new</i>	<p>2.7 Translating the NPF to City and County Levels</p> <p>In setting targets for planned future growth, the NPF sets out how we can achieve our overall national, regional and local objectives in a coherent and co-ordinated manner. To ensure that the shared vision is carried through from national, to regional and local level and that there is an effective process of alignment, an updated 'Implementation Roadmap' will be published to translate national and regional planned growth projections to city and county levels.</p> <p>The revised targets will support a plan-led approach to NPF implementation at regional and local level, allowing NPF growth objectives to be incorporated into city and county development plans as they are reviewed. In this regard, matters related to the targeted population and housing numbers and the estimated capacity of each settlement for growth is determined at the plan-making stage, in accordance with the hierarchy of plans prescribed under the Planning and Development Act.</p> <p>Planned growth at settlement level is to be reflected in the objectives of the statutory development plan, including land use zoning objectives, subject to an appropriate and proportionate element of flexibility in line with statutory guidelines, and will be required to have regard to matters such as appropriate densities to be applied, taking into account the particular circumstances and location.</p> <p>Accordingly, while plan-led targets at settlement level will inform the plan-making process and thereby form the basis for decision-making, the consideration of individual development proposals on zoned and serviced development land subject to consenting processes under the Planning and Development Act will have regard to a broader set of considerations beyond</p>	Request early engagement with Local Authorities to establish the objectives of the Roadmap and their functional role in delivering and monitoring the implementation of the NPF at local level.

Table 1: Feedback on Tracked Changes to the NPF		
National Planning Framework 2018	Draft Revised National Planning Framework 2024	Feedback
	<p>the targets alone, including where there may be extant, but as yet unimplemented planning permissions.</p> <p>National Policy Objective 11 <i>Planned growth at a settlement level shall be determined at development plan-making stage and addressed within the objectives of the plan. The consideration of individual development proposals on zoned and serviced development land subject of consenting processes under the Planning and Development Act shall have regard to a broader set of considerations beyond the targets including, in particular, the receiving capacity of the environment.</i></p>	
<i>new page 25</i>	<p>The imperatives of meeting the decarbonisation targets heighten the importance of achieving more sustainable growth patterns in the regions and cities. Within each region, the cities in particular play a key role in giving effect to the large scale transition to net zero required by 2050 and can support a move towards reduced carbon living e.g. through better energy demand management and alternative energy solutions, sustainable mobility and lower carbon buildings. Regional development goals must also ensure a just transition to carbon neutrality, within the wider statutory framework of climate action, supporting alternative employment in place of traditional industries, and supporting persons and communities that may be negatively impacted by the transition.</p> <p>It is clear that a strengthening of institutional and governance arrangements to coordinate implementation of the NPF at national, regional and metropolitan levels, across all stakeholders involved, will be required if the strategy is to be delivered successfully. The broad range of stakeholders involved in delivering the social, community and ‘hard’ infrastructure elements required to facilitate transformative growth in metropolitan areas – including not just regional assemblies and county and city councils but also Government Departments and agencies such as Uisce Éireann, TII, NTA,</p>	<p>Support the additional references of Climate transition throughout the document.</p> <p>The revised NPF would benefit from the addition of an additional case study box highlighting the participation of Cork and Dublin as Ireland's two participating cities in the EU Mission for Climate Neutral and Smart Cities. Both cities offer the opportunity to trial and scale up transformative climate actions that are built on a whole city approach. This is an opportunity to frame the NPF through the lens of cities accelerating progress with the support of national government and state agencies, working across all relevant sectors.</p> <p>The revised NPF would benefit from the addition of a table of all the proposed changes / actions</p>

Table 1: Feedback on Tracked Changes to the NPF		
National Planning Framework 2018	Draft Revised National Planning Framework 2024	Feedback
	OPW, port authorities - requires a level of coordination and interaction at the national, regional and metropolitan scale.	that have a climate impact inserted as an appendix.
<i>new page 31</i>	The continued performance of Dublin as a high quality international city of scale is critical to Ireland's overall competitiveness.	As flagged throughout the submission, Cork is recognised as an emerging international second city. Request that the text be amended to add this.
<i>new page 31</i>	It will also require significant greenfield development, on sites that can be integrated into with the existing built-up area of the city and that are serviced by existing or planned high capacity public transport, with a focus on large-scale brownfield and greenfield Transport Orientated Development opportunities, particularly along high-capacity rail corridors.	Suggest cross referencing with NPO 10 and adding a reference to the important role of the five cities in delivering TOD.
<i>new page 41</i>	The three city regions, both individually and collectively are a key asset of the region and will play a major role in both driving and accommodating a significant proportion of the additional 380,000 300,000 people anticipated in the overall region between 2022 and by 2040, taking its population to almost 2 million people. The Southern Region increased in population by 45,000 persons (6.6%) during the 2016 to 2022 period and all counties in the region increased in population during this time. Within the Southern Region, the South East region (Carlow, Kilkenny, Wexford, Waterford) had the largest increase while the Mid- West region (Clare, Limerick, Tipperary) had the lowest rate of growth at 5.8%.	Review needed as the numbers for Southern Region growth appear incorrect. The population of the Southern Region grew by 117,487 (7.4%) from 2016 to 2022. Suggest adding a reference to population numbers and not just growth rates to inform compact growth. Cork City administrative area grew by 13,000 + people and Cork MASP grew by 23,000+ people.
<i>Bullet point 4, page 45</i>	Delivering BusConnects Cork and the Cork Area Commuter Rail Programme. Progressing the sustainable development of new brownfield and greenfield areas for housing along existing and planned high capacity public transport corridors with a particular focus on large-scale Transport Orientated Development (TOD) opportunities within the metropolitan area, especially those on public transport corridors, such as Monard;	Suggest cross referencing with NPO 10.

Table 1: Feedback on Tracked Changes to the NPF		
National Planning Framework 2018	Draft Revised National Planning Framework 2024	Feedback
<p><i>Page 55</i> <i>Cork city and suburbs now to grow by 40% to 2040, previously “50% to 60%”</i></p>	<p>The Dublin City and immediately adjoining suburban area should therefore plan to grow at a targeted rate of just above the projected national average to 2040, i.e. by around 20% to 25%¹⁸. The planned rate of growth in the Cork City and suburban area should be between two or three times the national average (50% to 60% approximately 40%), over the same period.</p>	<p>The revised targets reflect the continuing trend (2016-2022) of no major shift in regional balance. Given the findings from the Report of the Housing Commission (May 2024), including the significance of pent-up housing demand, the proposed revisions should reinforce future ambitions for the regions and Cork City and suburbs in particular, by increasing the targeted growth. This will reinforce critical outcomes of compact growth, enhanced regional accessibility and sustainable mobility set out in the NSO’s.</p>

Table 4.1 | Ireland 2040: Targeted Pattern of City Population Growth

City	Population	2018 NPF	Population Growth to 2040 ²¹		Minimum Target Population 2040	Feedback
	2016 2022		% Range 2016-2040	% Range 2022-2040		
Dublin - City and Suburbs	1,263,000 1,173,000	20-25%	20-25%	296,000 335,000 293,000	1,408,000 1,560,000	<p>The revised targets reflect the continuing trend (2016-2022) of no major shift in regional balance and project a larger share of growth towards Dublin city and Suburbs.</p> <p>The NPF's objectives and policies have only recently been integrated into regional and local plans. Given planning and delivery timeframes, the realisation of these targets and policies will take more time to meaningfully influence regional and local growth patterns. A more ambitious spatial rebalance needs to be reflected in the numbers, to allow for the policies to take into effect.</p> <p>Note that the use of the 'Cork City and Suburbs' CSO boundary makes the integration of these targets into development plans difficult.</p>
Cork - City and Suburbs	209,000 223,000	50-60%	40%	105,000 125,000 96,000	314,000 320,000	
Limerick - City and Suburbs	94,000 102,000	50-60%	40%	47,000 56,000 44,000	141,000 150,000	
Galway - City and Suburbs	80,000 86,000	50-60%	40%	40,000 48,000 36,000	120,000 122,000	
Waterford - City and Suburbs	54,000 60,000	50-60%	40%	28,000 27,000 - 32,000	81,000 88,000	

National Planning Framework 2018	Draft Revised National Planning Framework 2024	Feedback
Page 58 under "Planning for Urban Employment Growth"	<p>Planning to accommodate strategic employment growth at regional, metropolitan and local level should include consideration of:</p> <ul style="list-style-type: none"> Current employment location, density of workers, land-take and resource / infrastructure dependency, including town centres, business parks, industrial estates, and significant single enterprises and lands with high levels of public transport accessibility, including areas identified with potential for Transport Orientated Development (TOD); 	Suggest cross referencing with NPO 10 and adding a reference to the important role of the five cities in delivering TOD.
New Page 59 under "Planning for Urban Employment Growth"	'Smart specialisation' and 'clustering' policy provides an opportunity to build on local distinctiveness and regional strengths. Smart specialisation is a place-based innovation policy, aimed at promoting regional innovation and economic transformation by helping regions	Support and suggest adding a reference to the important role of the five cities and their metropolitan areas in delivering Smart Specialisation and Clustering.

National Planning Framework 2018	Draft Revised National Planning Framework 2024	Feedback
	<p>to focus on their key sectoral strengths. This may include unique characteristics or capabilities that provide advantages to that region in certain sectors. For example, this might include areas such as renewable energy, medical technologies, biopharma or ICT. It requires higher education, research organisations and business, along with government departments and agencies, to identify these strengths, build on competitive advantages and prioritise support based on where local potential and market opportunities lie. This aligns with the NPF’s focus on cities and regional centres as key drivers of sustainable growth. Smart specialisation also strengthens the relationship between the nine DETE Regional Enterprise Plans, the Regional Spatial and Economic Strategies, and national enterprise and innovation policy.</p> <p>In addition, the Department of Enterprise, Trade and Employment intends to devise and introduce a centrally coordinated, cross-Government approach to clustering in 2024 that will encourage the formation and strengthening of national cluster organisations, leveraging the benefits of proximity and co-location to boost productivity. The identification of priority areas for enhanced clustering will be underpinned by an assessment of competitive strengths and potential opportunities against a range of factors, including the scale of potential impact, innovation intensity and research capability, as well as market direction.</p>	
<p><i>New</i> Page 69 under “5.3 Planning for the Future Growth and Development of Rural Areas”</p>	<p><i>Town Centre First - A Policy Approach for Irish Towns</i> provides a co-ordinated, whole-of-government policy framework to proactively address the decline in the health of towns across Ireland and supports measures to regenerate and revitalise them. It highlights how re-use and regeneration of vacant and derelict buildings can be an essential catalyst to transforming the capacity and potential of smaller towns in Ireland. The policy was launched in 2022 and 26 'Pathfinder towns' were identified nationally to develop a community based Town Centre First Plan that will set out a vision for their town, and identify priority regeneration projects for</p>	<p>Support and suggest adding text around the ‘liveability’ or quality of life of urban places – how people experience living in cities, towns and villages. This includes the quality and authenticity of the built environment, including heritage building stock, the public realm, traffic and parking issues, access to amenities and public transport and a sense of personal safety and well-being;</p>

National Planning Framework 2018	Draft Revised National Planning Framework 2024	Feedback
	<p>subsequent appropriate funding applications and delivery. Further to the funding of the pilot 26 towns, a new package of supports will be launched in 2024 to expand on the delivery of the objectives within <i>Town Centre First</i>.</p>	
<p><i>New</i> <i>Page 75 under “Forestry”</i></p>	<p>The development of attractive, accessible close-to-home woodlands designed for the use and enjoyment of local communities is also encouraged. Access to such facilities and the experiences they provide are shown to have a tangible impact on public health and well-being of both young and old. The woodlands can cater for a wide range of activities, e.g. evening family walks, fitness training, nature studies. The associated involvement of local people in design and management, and the celebration of local heritage using information signs, leaflets, etc., contribute socially to the local community and add to the ‘sense of place’. Funding is available for the establishment of new amenity woodland, the enhancement of existing forest to ensure its suitability for use as amenity woodland, and the installation of various facilities appropriate to the woodland setting, to enable access by people of all ages and abilities.</p> <p>A number of schemes administered by Department of Agriculture Food and Marine, including the Afforestation Scheme, Native Tree Area Scheme, Woodland Creation on Public Lands Scheme, the Environmental Enhancement Scheme Pilot Scheme and the Heritage Forests Pilot Scheme support these objectives.</p>	<p>Support</p> <p>There is also a need for the revision to highlight the importance of the conservation of and planning for GBI and how local biodiversity features (wetlands, woodland, rivers, stream, scrub, grasslands and other habitat features). Therefore, a higher acknowledgement of the importance of and value of these local ecological features, and ecological corridors is essential. These areas are key to slowing biodiversity loss but are being lost nationally at a rapid rate.</p> <p>A wider reference to implementing Biodiversity Net Gain through appropriate land use planning would be very beneficial.</p>
<p><i>New</i> <i>Pages 76-77 under “5.5 Rural Investment Coordination”</i></p>	<p>Since the publication of NPF 2018 significant investment programmes for rural areas have been established. The Rural Regeneration and Development Fund (RRDF) as administered by the Department of Rural and Community Development, provides funding for the development and construction of large scale and transformative capital projects in towns, villages and rural areas across Ireland. Under RRDF applications to date, funding of €413</p>	<p>Support</p> <p>Suggest adding greater emphasis on the role of adaptive reuse of our heritage stock as a way of enabling compact growth which protects and enhances the distinctive character and its role in ensuring an attractive an enticing environment for more compact</p>

National Planning Framework 2018	Draft Revised National Planning Framework 2024	Feedback
	<p>million has been approved towards 215 projects costing €565 million.</p> <p><i>Town Centre First: A Policy Approach for Irish Towns</i>, published in 2022, seeks to align policies and co-ordinate a suite of supports and funding streams to re-imagine and revitalise rural towns. Under the policy, local communities are enabled to prepare a Town Centre First Plan, with the support of a dedicated local authority Town Regeneration Officer, which will set out specific actions and interventions and help unlock national funding such as the RRDF and the Town and Village Renewal Scheme.</p> <p>The third round of URDF funding support, which is a key action in the Government's Vacant Homes Action Plan 2023, is specifically designed to address long term vacancy and dereliction across eligible cities and towns, and the acceleration of the provision of residential accommodation. This initiative is also in support of objectives under the revised Housing for All and Town Centre First Policy. The focus of the RRDF fifth call in early 2024 is to support projects that help revitalise our rural towns and villages, in line with the Town Centre First policy approach. This will drive greater footfall and address vacancy and dereliction, and support projects to assist in attracting people back to live in rural areas and support local economic development. 84</p> <p>The CLÁR programme and the Town and Village Renewal Scheme (TVRS) also support the regeneration of rural towns and villages. Two schemes under the Croí Cónaithe Towns Fund are delivered by local authorities. The Vacant Property Refurbishment Grant provides people with a grant to support the refurbishment of vacant and derelict properties. Under the Ready to Build scheme, local authorities make serviced sites available to individuals or households who want to build their own home in a town or village, to provide a viable and attractive alternative for people who want to build their own home and live in a rural area, while still being able to walk or cycle to a range of local services and amenities, including schools,</p>	<p>living, consistent with the Town Centre First Policy and Framework 2022 which is being actively pursued by Government.</p>

National Planning Framework 2018	Draft Revised National Planning Framework 2024	Feedback
	<p>shops, community hubs and sports clubs. This, coupled with the refurbishment scheme for vacant properties, is supporting towns and villages across Ireland in delivering new homes that respond to the varying needs and aspirations of their communities.</p> <p>LEADER will also continue to be an effective tool for supporting the economic and social development of rural communities, and for strengthening the socio-economic fabric of rural areas, by providing the resources necessary for communities to support their own sustainable development.</p> <p>The Built Heritage Investment Scheme, Historic Structure Fund, and the Community Monuments Fund are investing essential capital in our archaeological heritage to help owners and custodians of archaeological monuments safeguard them into the future for the benefit of communities and the public all contribute to support our rural areas and historic structures.</p>	
<p><i>Amendment NPO 32 (now NPO 43)</i></p>	<p>National Policy Objective 3243 <i>To target the delivery of housing to accommodate 550,000 hundreds of thousands approximately 50,000 of additional households per annum to 2040.</i></p>	<p>Support. Suggest adding reference to building in the right places in accordance with the relevant NSO's</p>
<p><i>Amendments, page 92</i> <i>Inclusion of reference to "medium density" where in the original NPF reference only to high density</i></p>	<p>Well designed and located higher and medium density housing will assist:</p> <ul style="list-style-type: none"> ○ Fast-growing urban areas to achieve much needed scale; ○ Medium-sized urban areas to find a route to quality in a new competitive framework; ○ All urban areas to increase vibrancy and vitality; ○ Increased efficiency and sustainability in the use of energy and public infrastructure. <p>The infill/brownfield targets set out in NPOs 7, 8 3a, 3b and 9 3c of this Framework will necessitate a significant and sustained increase in urban housing output including and apartment type development and medium density housing in particular appropriate locations, if</p>	<p>Support. Suggest adding a regional case study on best practice in delivering compact medium density housing.</p>

National Planning Framework 2018	Draft Revised National Planning Framework 2024	Feedback
	we are to avoid a continuation of the outward expansion of cities and larger urban areas.	
<p>Changing Family Size</p> <p>Currently, 7 out of 10 households in the State consist of three people or less, with an average household size of 2.75 people. This is expected to decline to around 2.5 people per household by 2040. Household sizes in urban areas tend to be smaller than in the suburbs or rural parts of the country. In Dublin city, one, two and three person households comprise 80 percent of all households²⁶. Yet, the stock of housing in Ireland is largely comprised of detached and semi-detached houses with three to four bedrooms.</p>	<p>Changing Family Size</p> <p>Currently, almost 50% of people in the State live in households of three people or fewer, with an average household size of 2.74 people. Household sizes in urban areas tend to be smaller than in the suburbs or rural parts of the country. In Dublin city, almost 60% of people live in one, two and three person households.</p>	<p>Suggest editing to broaden out the reference to AHS in Dublin to the other cities.</p> <p>The Average Household Size (AHS) in Cork City is 2.62 persons with a wide range across the city's neighbourhoods (1.9 persons - 3.2 persons) and being notably smaller in central neighbourhoods (1.9-2.2 persons). (Source: Cork City Neighbourhood Profile – Census 2022 update)</p>
<p>New</p> <p><i>Under section 9.2 “Resource Efficiency and Transition to a Low Zero Carbon Economy”</i></p> <p><i>* note change from low to zero</i></p>	<p>The Environmental Protection Agency⁴³ highlights that human activity has led to widespread and rapid changes in all components of the global climate system with recent extreme events in Ireland highlighting the vulnerability of individuals, communities, sectors and ecosystems to climate change and indicate an adaptation deficit. Solutions need to be implemented across all sectors and society. Ireland's environmental challenges cut across different environmental topics, such as climate, air, soil, water, biodiversity and waste, and across organisations and sectors, business and all levels of society.</p> <p>Environmental and source capacity needs to be a key consideration when identifying growth areas. The capacity of the environment and the natural resource is critical to achieving sustainable development. Since 2018, there have been significant responses to address the climate crisis in the form of EU Directives, national legislation and policy approaches, including the following:</p> <ul style="list-style-type: none"> ○ EU Action Plan: Towards Zero Pollution for Air, Water and Soil, 2021. ○ EU Fit for 55 package ○ The recast Renewable Energy Directive (Directive EU/2018/2001 and amending Directive EU/2023/2413) 	<p>Support and suggest adding references to the importance of the Dublin and Cork in delivering Climate Transition. The document should reference the need to retrofit and decarbonise space heating systems for the existing housing stock on an expedited basis. Cork and Dublin, as Mission Cities, find poorly insulated, fossil-fuelled housing as the single biggest sources of emissions sectorally. Identifying ways to prioritise the National Retrofit Plan on these cities, review incentives and supports, consider workforce development for retrofit, all merit inclusion in this section.</p>

National Planning Framework 2018	Draft Revised National Planning Framework 2024	Feedback
	<ul style="list-style-type: none"> ○ Energy Performance in Buildings Directive (EPBD), ○ The Climate Action and Low Carbon Development (Amendment) Act 2021, ○ Climate Action Plan 2023 (subject to annual reviews) ○ Phase 1 of the Land Use Review, ○ A Waste Action Plan for a Circular Economy 2020, ○ Circular Economy and Miscellaneous Provisions Act 2022, ○ Circular Economy Strategy 2022, ○ BioEconomy Action Plan 2023 – 2025 ○ National Adaptation Framework ○ Sectoral Adaptation Plans ○ Forest Strategy Implementation Plan including the Forestry Programme 2023-2027 (refer to Rural Chapter) ○ European Communities (Birds and Natural Habitats) Regulations 2011 to 2021 ○ Ireland’s 4th National Biodiversity Action Plan 2023-2030 ○ Wildlife (Amendment) Act 2023 ○ National Smart Specialisation Strategy for Innovation 2022-2027 [High Level Strategic Goal No. 5] <p>Emerging Legislation and Policy approaches include:</p> <ul style="list-style-type: none"> ○ Proposal for a Regulation of the European Critical Raw Materials Act, 2023. ○ Proposal for a European Net Zero Industry Act, 2023. ○ Proposal for a European Nature Restoration Law ○ Proposal for a Directive on an EU Carbon Removal Certification Framework ○ Proposal for an EU Soil Monitoring and Resilience (Soil Monitoring Law) ○ Draft National Biomethane Strategy ○ Phase 2 of the Land Use Review ○ Climate Action Plan 2024 ○ The EU Action Plan for Grids, Actions to accelerate the roll-out of electricity grids (europa.eu) 	

National Planning Framework 2018	Draft Revised National Planning Framework 2024	Feedback
	<p>This Framework can support the response to climate change by encouraging the reduction of greenhouse gases through a variety of measures including;</p> <ul style="list-style-type: none"> ○ the achievement of our compact growth objectives and the consequential reduction of overall land take; ○ the interaction between land use planning and transport infrastructure, associated potential for carbon emissions reductions resulting from reduced commuting patterns associated with future growth; ○ promoting re-use of existing buildings to reduce emissions associated with new construction; ○ the continued reduction in dependency on imported fossil fuels and decarbonisation of the energy system as a whole and in particular the electricity sector through the identification of targets for renewable electricity and the accelerated roll out of on-shore wind energy and solar development; ○ encouraging climate resilient planning policies; ○ limiting inappropriate developments in areas where climate impacts are likely to be most severe; ○ providing guidance to local authorities on climate resilient planning practises including nature based solutions. <p>⁴³ Ireland’s Climate Change Assessment, 2023 Environmental Protection Agency</p>	
<p><i>Amended text page 128</i></p>	<p>In catering for an additional one million people and a move towards alternative renewable energy sources, increased demand for land is likely to include the identification of suitable locations for renewable energy and associated grid connections, bioenergy supply, waste management, agricultural food production, forestry, and other land services alongside the need to consolidate our existing cities, towns, and</p>	<p>Support. Suggest adding reference on the critical need to deliver on this task.</p>

National Planning Framework 2018	Draft Revised National Planning Framework 2024	Feedback
	<p>villages with the building of more houses, schools, industry, and other facilities while</p> <p>protecting the cultural heritage significance of the historic built environment and cultural landscapes and the conservation and restoration of nature. Competition for land resources needs careful management and the nature and rate of land use change indicates where future environmental pressures are likely to arise. It is important that synergies between utilities and infrastructure delivery partners are explored and that the environmental capacity of the receiving environment is considered in an integrated manner in policy and plan-making.</p>	

National Planning Framework 2018	Draft Revised National Planning Framework 2024	Feedback
<p><i>New (continued from above)</i> <i>Page 135-136</i></p>	<p>Each Regional Assembly will prepare a Regional Renewable Electricity Strategy (RRES), whereby additional detail will be outlined on how the regional renewable electricity capacity allocations for the region can be best achieved in a consistent and sustainable manner, including the identification of specific targets for each of the constituent local authorities.</p> <p>National Policy Objective 55F 76 <i>Local Authorities shall plan for the delivery of Target Power Capacity (MW) allocations consistent with the relevant Regional Spatial and Economic Strategy, through their City and County Development Plans.</i></p>	<p>Request early engagement with Local Authorities to establish the LA targets within the new Regional Renewable Electricity Strategies.</p>
<p><i>New</i> <i>Page 138</i></p>	<p>Nature Based Solutions Population increase inevitably requires the necessary expansion of built areas. This can result in increasing pressure on our natural resources. Nature-based Solutions are actions to protect, sustainably manage, and restore natural and modified ecosystems that address societal challenges effectively and adaptively, simultaneously benefiting people and nature⁵⁴.</p>	<p>Support and request further integration of NBS references within the revised NPF. Suggest adding a reference to the increasing importance of nature based urban rainwater management as part of flood risk management generally.</p>

National Planning Framework 2018	Draft Revised National Planning Framework 2024	Feedback
	<p>The European Commission defines nature-based solutions as: <i>“Solutions that are inspired and supported by nature, which are cost-effective, simultaneously provide environmental, social and economic benefits and help build resilience. Such solutions bring more, and more diverse, nature and natural features and processes into cities, landscapes and seascapes, through locally adapted, resource-efficient and systemic interventions.”</i></p> <p>Nature-based solutions must therefore benefit biodiversity and support the delivery of a range of ecosystem services.</p> <p>Sustainable urban development solutions, such as water sensitive urban design, can help to mitigate the potential for environmental degradation in the form of biodiversity loss, pollution of water bodies, and increased flood risk as the demand for urban development to accommodate a growing population continues to increase.</p> <p>National Policy Objective 57A 79 <i>Support the management of stormwater, rainwater and surface water flood risk through the use of nature-based solutions and sustainable drainage systems.</i></p> <p>National Policy Objective 57B 80 <i>Support the retrofitting of existing environments to cater for surface water run-off through the use of nature based solutions, including the implementation by Uisce Éireann of Integrated Drainage Plans on a prioritised settlement basis.</i></p>	
<p><i>Amended text</i> <i>Page 140</i></p> <p><i>Changes to GBI text and NPO</i></p>	<p>Green and Blue Infrastructure</p> <p>Our environment is an asset that if planned for in the same way as for other forms of infrastructure, can provide long term benefits.</p> <p>Green and blue infrastructure provide a range of uses, goods and services and make the best use of land, water and help manage competing demands and can complement other sectors.</p> <p>Green infrastructure is an interconnected network of green space that conserves natural ecosystem values and functions that also provides associated benefits to the human population. It is a</p>	<p>Support. Suggest adding a case study on GBI implementation, such as the Cork City GBI strategy that’s forms an integral part of the Cork City Development Plan 2022-2028.</p> <p>Suggest clarifying the paragraph, to distinguish between “environment” which is a generic term and “green and blue infrastructure”, with clearer</p>

National Planning Framework 2018	Draft Revised National Planning Framework 2024	Feedback
	<p>strategically planned network of natural and semi-natural areas with other environmental features designed and managed to deliver a wide range of ecosystem services. It incorporates green spaces (or blue if aquatic ecosystems are concerned) and other physical features in terrestrial (including coastal) and marine areas including features of cultural heritage significance.</p> <p>Connectivity between these spaces can also be beneficial for people to provide for improved permeability, thus supporting sustainable travel modes and recreational networks, in addition to clean air and better water quality. Implementing green infrastructure features creates a greater sense of community, strengthens the link with voluntary actions undertaken by civil society, and helps combat social exclusion and isolation. Green and blue infrastructure creates opportunities to connect rural and urban areas and provides appealing places in which to live and work.</p> <p>An attractive environment is important for mental and physical health, tourism and a vibrant, well planned area with good amenities will contribute to attracting skilled employees and investment to underpin long-term development. Cultural heritage assets contribute significantly to the attractiveness of areas and provide a sense of identify and well-being to residents and visitors alike. Our natural assets are also valuable for carbon capture, which will assist in meeting climate mitigation and adaptation goals and national biodiversity targets.</p> <p>Green and blue infrastructure planning will inform the preparation of regional and metropolitan strategies and city and county development plans by:</p> <ul style="list-style-type: none"> ○ Assisting in accommodating growth and expansion, while retaining the intrinsic value of natural places and natural assets; 	<p>references to the permeability of surfaces in terms of land-use, contrasting the green and blue spaces with built-up concrete ‘grey’ areas. A reference to soil would help ground the relation between GBI and strategic planning. GBI also includes private gardens and all green and blue spaces within private or institutional lands.</p> <p>The need for better connections of those spaces needs to be highlighted, to recreate healthy ecosystems, both for human and biodiversity needs.</p> <p>Suggest changing ‘Cultural heritage’ for ‘Natural heritage’, as it introduces a confusion.</p>

National Planning Framework 2018	Draft Revised National Planning Framework 2024	Feedback
	<ul style="list-style-type: none"> ○ Providing increased certainty in planning by proactively addressing relevant environmental issues; ○ Encouraging more collaborative approaches to plan-making by enabling examination of the interactions between future development requirements and the capacity of receiving areas; and ○ Ensuring that sufficient and well planned green spaces, is commensurate in scale to long-term development requirements, are designated in statutory plans. <p>National Policy Objective 58 81 <i>Integrated planning for Green and Blue Infrastructure and maintaining ecosystem services and ecosystem functions will be incorporated into the preparation of statutory land use plans while maintaining ecosystem services and ecosystem functions and conserving and/or restoring biodiversity.</i></p> <p>It is also important to consider the interrelationships between biodiversity, natural heritage, landscape and our green spaces.</p> <p>Green Belts and Green and Blue Spaces <i>The importance of well-protected “green” and “blue spaces” such as parks, rivers, ponds and wild areas in the urban landscape is now recognised as a key part of urban landscapes that are needed for healthy communities and also offer the potential for climate adaptation co-benefits.</i> <i>These spaces in our cities, towns and villages play an integral role as part of the fabric of our settlements, either through their use for community recreation and amenity purposes, supporting biodiversity or as a natural delineation of the settlement itself, forming the interface between urban and rural areas.</i> Green spaces and parks have a role in determining the quality of life in and sustainability of, our settlements. Green belts adjoining our urban areas also fulfil a strategic purpose, as a potential asset for</p>	

National Planning Framework 2018	Draft Revised National Planning Framework 2024	Feedback
	<p>future, planned development as an urban extension, particularly at a city scale.</p> <p>National Policy Objective 62 82 <i>Identify and strengthen the value of greenbelts and green and blue spaces at a regional, and city and local scales, to enable enhanced connectivity to wider strategic networks and prevent coalescence of settlements and to allow for the long-term strategic expansion of urban areas. Promote and support an increase in the provision of green and blue spaces and tree canopy cover in settlements.</i></p>	
<p><i>Amended text Page 141-142</i></p> <p><i>Changes to Biodiversity text and NPO</i></p>	<p>Strategic Planning for Biodiversity</p> <p>The Habitats Directive contains obligations to protect certain species wherever they occur, while the Birds Directive contains protections for all birds, and they may only be disturbed or controlled subject to licence or derogation, as appropriate. The Wildlife Acts also afford certain protections to aspects of Irish wildlife. The diversity of our biological communities is also important for the quality of our water, soils and as a source of food. The importance of our biodiversity is not restricted to legally protected areas and there are a range of measures in place to protect species and habitats more broadly in the wider countryside, including birds as required under Article 4 of the Birds Directive. The Global Biodiversity Outlook (UN 2020) has identified the importance of conservation measures undertaken to date in limiting species extinctions but also the lack of joined-up policies to prevent biodiversity loss, the extent of the biodiversity crisis and the need for immediate action to avoid irreversible losses. This includes managing land use change as a driver of biodiversity loss globally both within and outside of protected areas.</p> <p>In recent years, there has been increasing awareness globally of the biodiversity crisis. Several reports have highlighted the further decline in biodiversity. Ireland’s Sixth National Report to the UN Convention on Biological Diversity reported that 85% of protected habitats in Ireland are in unfavourable status and 46% are declining, while 14% of species assessed were considered as endangered. Ireland ratified</p>	<p>Support. Suggest adding the following references:</p> <ul style="list-style-type: none"> • Include a reference to The National Biodiversity Action Plan 2050 mission that, ‘Biodiversity in Ireland is valued, conserved, restored and sustainably used, maintaining ecosystem services, sustaining a healthy planet and delivering benefits essential for all people.’ • Increase the references to the need for Biodiversity Net Gain as a key principal to support Ireland in its ambition to halt biodiversity loss. • Include a reference to the need to support biodiversity recovery in line with national targets • Include a reference to the importance and potential for Nature-based solutions and upstream storage as essential mechanisms to support the local economy, rural social sustainability, the agricultural sector and biodiversity.

National Planning Framework 2018	Draft Revised National Planning Framework 2024	Feedback
	<p>the United Nations Convention on Biological Diversity (1992) and through the transposition of EU laws and Wildlife Act we are obliged to act to conserve biodiversity and prepare a National Biodiversity Action Plan.</p> <p>Ireland’s 4th National Biodiversity Action Plan 2023-2030, was launched in January 2024. Implementation of actions within the Plan will contribute towards the 2050 vision that <i>Biodiversity in Ireland is valued, conserved, restored and sustainably used, maintaining ecosystem services, sustaining a healthy planet and delivering benefits essential for all people.</i></p> <p>In terms of national legislation, the Wildlife Acts 1976 to 2023 play an important role in underpinning biodiversity and nature conservation in Ireland. The Wildlife (Amendment) Act 2023 provides for the first time a statutory basis for our National Biodiversity Action Plans, with the commitment to produce a plan every three to five years.</p> <p>The Environmental Impact Assessment Directive also requires that the direct and indirect significant effects of a project on biodiversity, with particular attention to species and habitats protected under the Birds and Habitats Directives are identified, described and assessed as part of the consent process.</p> <p>It is also important to recognise the interconnection of climate and biodiversity from an all-Island perspective. The All-Island Climate and Biodiversity Research Network (AICBRN) brings together researchers from a wide range of disciplines across the island of Ireland who are undertaking research in climate and biodiversity topics.</p> <p>By the end of 2026, all Local Authorities are to have a Biodiversity Action Plan in place, in line with the National Biodiversity Action Plan.</p> <p>Nature Restoration</p> <p>The EU Nature Restoration Law seeks to restore at least 20% of the EU’s land and sea areas by 2030 and all ecosystems by 2050. 80% of EU habitats are in bad or poor conservation status. The EU Nature</p>	<ul style="list-style-type: none"> • A more direct reference to adequate soil management guidelines in relation to development management would strengthen this paragraph.

National Planning Framework 2018	Draft Revised National Planning Framework 2024	Feedback
	<p>Restoration Law provides an opportunity to restore nature, both nationally and across the wider EU region. Nature restoration can also deliver substantial co-benefits for climate action such as carbon emissions reduction from the land use sector, as well climate adaptation and resilience through the enhancement of natural buffers against flooding and coastal inundation.</p> <p>It is a target of the 4th National Biodiversity Action Plan (NBAP) to publish a National Restoration Plan by 2026, which is to set out the procedures for designation of nature restoration areas and corresponding policies.</p> <p>National Policy Objective 83 <i>In line with the National Biodiversity Action Plan and European Union Nature Restoration Law, and best available scientific information, regional and local planning authorities shall support the preparation of the National Restoration Plan.</i></p> <p>National Policy Objective 84 <i>In line with the National Biodiversity Action Plan; the conservation, enhancement, mitigation and restoration of biodiversity is to be supported by:</i></p> <ul style="list-style-type: none"> • <i>Integrating policies and objectives for the protection and restoration of biodiversity, including the avoidance and/or minimisation of potential biodiversity impacts, in statutory land-use plan.</i> • <i>Retention of existing habitats which are currently important for maintaining biodiversity (at local/regional/national/international levels), in the first instance, is preferable to replacement/restoration of habitats, in the interests of ensuring continuity of habitat provision and reduction of associated risks and costs.</i> <p>National Policy Objective 85</p>	

National Planning Framework 2018	Draft Revised National Planning Framework 2024	Feedback
	<p><i>In line with the objectives of the National Biodiversity Action Plan, planning authorities should seek to address no net loss of biodiversity within their plan making functions.</i></p> <p>National Policy Objective 59 86 <i>Enhance the conservation status and improve the management of protected areas and protected species by:</i></p> <ul style="list-style-type: none"> • <i>Implementing relevant EU Directives to protect Ireland’s environment and wildlife and support the objectives of the National Biodiversity Action Plan;</i> • <i>Integrating policies and objectives for the protection and restoration of biodiversity in statutory development plans;</i> • <i>Developing and utilising licensing and consent systems to facilitate sustainable activities within Natura 2000 sites;</i> • <i>Continued research, survey programmes and monitoring of habitats and species.</i> 	
<p><i>New Page 144</i></p>	<p>Urban waste water treatment plant compliance and remedial actions are therefore a key short term priority. In the longer term, capacity issues need to be resolved to meet growing demand to 2040 and beyond. <i>In plan-making and decision-making within the planning system, decision makers should consider both the capacity of the receiving environment to accommodate the development of water and wastewater infrastructure in line with statutory environmental legislation, and the potential to align planned growth with existing water and wastewater infrastructural capacity, to the extent feasible. Uisce Éireann publishes annual water supply and wastewater treatment capacity registers, which can assist with this process.</i> At the household level, it will also be necessary to be more vigilant to the risks of contamination to private wells as a source of drinking water and failures in domestic waste water treatment systems.</p> <p>National Policy Objective 63 89 <i>Ensure the alignment of planned growth with the efficient and sustainable use and development of water resources and water services infrastructure, in order to manage and conserve water</i></p>	<p>Support.</p> <p>Suggest adding a reference to the importance of long-term strategic planning of critical water and waste water infrastructure, such as Uisce Eireann’s Cork Wastewater Strategy, currently being undertaken.</p>

National Planning Framework 2018	Draft Revised National Planning Framework 2024	Feedback
	resources in a manner that supports a healthy society, economic development requirements and a cleaner environment.	
<p><i>New</i> <i>Page 147 under “10.1 Governance”</i></p>	<p>There is recognition that the key investments needed to sustain projected population growth and attractiveness to 2040, in areas such as housing, energy, climate, transport, healthcare and education, will give rise to coordination and capacity challenges. The Government is advancing a range of reforms and actions aimed at enhancing capacity and addressing constraints to NDP delivery. An ESRI report to Government titled ‘The National Development Plan in 2023: Priorities and Capacity’ (2024) also makes suggestions on how the timing and sequencing of NDP projects might be designed so that maximum benefits are derived.</p> <p>The OECD Report ‘Towards Balanced Regional Attractiveness in Ireland: Enhancing the Delivery of the National Planning Framework’ (OECD 2023) explores existing institutional and governance arrangements in Ireland, making recommendations in relation to initiatives that could be introduced or scaled to support NPF delivery. One of the key observations is that the NPF strategy for more balanced regional growth sets a new way forward and that in turn, governance and institutional arrangements need to adapt to support a move away from ‘business as usual’. The report sees a strong role for regional and local government, highlighting the need for greater clarity in relation to their role in NPF implementation. It highlights opportunities for greater leadership and competences at these levels.</p> <p>At a national level, the OECD recommends more formalised mechanisms to support the coordination of projects of regional concern e.g. through the PI2040 Delivery Board. The OECD also recommend new governance arrangements at regional level to improve coordination between national, regional and local authorities, infrastructure providers and other stakeholders in order to secure the delivery of Regional Spatial and Economic Strategies and Metropolitan Area Strategic Plans. These</p>	<p>Support. Suggest adding more specific on how the NPF proposes to implement the findings of the OECD report.</p>

<i>National Planning Framework 2018</i>	<i>Draft Revised National Planning Framework 2024</i>	<i>Feedback</i>
	recommendations go beyond the scope of the NPF as a spatial planning strategy, but are relevant to the overall achievement of the NPF's objectives and will need to be considered in parallel, to ensure that the relevant mechanisms are in place to support NPF delivery.	

Table 10.1 | National Planning Framework Phased Population Growth

Region	2026 NPF Targeted Population Growth	2031 NPF Targeted Population Growth	2040 NPF Targeted Population Growth	Feedback
Eastern and Midland	240,000–265,000	335,000–375,000 270,000	490,000–540,000 500,00 470,000	The revised targets increase the population share allocated to the Eastern and Midlands region by slightly decreasing the population share allocated to the Southern region. Giving the need to implement the NPF targets of regional rebalance and the critical need for sustainable compact growth and reduction of sprawl, suggestion to amend to heighten the ambition for the Southern Region. As outlined in the main submission, Cork City metropolitan area can accommodate ambitious growth within the existing footprint with strategic investment into TOD.
Northern and Western	65,000–75,000	100,000–110,000 85,000	160,000–180,000 150,000	
Southern	155,000–170,000	220,000–245,000 195,000	340,000–380,000 330,000	
State Total Growth	460,000–510,000	655,000–730,000 555,000	990,000–1,100,000 950,000	
State Total Population	5,220,000–5,275,000	5,415,000–5,490,000 5,700,000	5,750,000–5,860,000 6,100,000	

<i>National Planning Framework 2018</i>	<i>Draft Revised National Planning Framework 2024</i>	<i>Feedback</i>
<i>Amended & new text</i> <i>Page 150 under “Metropolitan Area Strategic Plan”</i>	It would be reasonable in the context of a Metropolitan Area Strategic Plan and as part of phasing-in the transition to achieving urban consolidation and brownfield targets, that a proportion of up to 20% of the phased population growth targeted in the principal city and suburban area, could potentially be accommodated in the	Given the existing levels of pent-up demand in achieving the NPF growth targets at MASP level, the need for this approach is not considered to be required.

National Planning Framework 2018	Draft Revised National Planning Framework 2024	
	<p>wider metropolitan area i.e. outside the city and suburbs or contiguous zoned area. This would be in addition to growth identified for the Metropolitan area.</p> <p>Planned growth in the metropolitan area would be targeted towards the delivery of new sustainable communities at brownfield and greenfield locations along existing or planned high capacity public transport corridors in accordance with the principles of Transport Orientated Development.</p>	<p>In order to ensure the continued delivery of increasing compact growth within Cork City and metropolitan Area, it is requested that this objective be revised to reflect the above and to allow the SRA and the RSES to oversee the need for and the implementation of this (as part of the preparation, implementation and monitoring of the MASPs.)</p>
<p><i>New objective page 150 under “Metropolitan Area Strategic Plan”</i></p>	<p>National Policy Objective 68 93</p> <p><i>The Metropolitan Area Strategic Plans, shall include provision for large-scale Transport Orientated Development (TOD) opportunities and may target a proportion of planned growth in the metropolitan areas towards the delivery of new sustainable communities at brownfield and greenfield locations in the principal city and suburbs areas and in the wider metropolitan areas focused on opportunities arising from existing and planned major public transport investment, along planned high capacity public transport corridors and in accordance with the principles of Transport Orientated Development.</i></p>	<p>Support and suggest cross referencing with NPO 10.</p>
<p><i>Amended & new text Page 150 under “Integrated Spatial and Transport Planning”</i></p>	<p>Integrating Spatial and Transport Planning</p> <p>Planning and transport policies are highly interdependent interdependent. The integration of land uses with access to transport has cross-cutting benefits in terms of achieving compact patterns of development (through facilitating increased densities in accessible locations), transition to a low carbon and climate resilient society (through reduced emissions) sustainable mobility (through fewer journeys undertaken by car) and the transition to electric vehicles . Forms of Transport Orientated Development (TOD) in particular have the potential to locate a significant proportion of future population, housing, employment, services and amenities along high capacity transport networks and at transport nodes.</p>	<p>Support and suggest cross referencing with NPO 10.</p>

National Planning Framework 2018	Draft Revised National Planning Framework 2024	
	<p>Responsibility for the integration of land use and transportation outside of central Government, is a joint responsibility of planning authorities, the NTA and other government agencies.</p>	
<p><i>New</i> <i>Page 151</i></p>	<p>The Department of Housing, Local Government and Heritage and the Department of Transport are working with the LDA, NTA, local and regional authorities and infrastructure providers to identify suitable opportunities for Transport Orientated Development (TOD) at scale in the five cities, aligned to planned investment in the public transport network. Transport Orientated Development supports NPF priorities for Compact Growth, Sustainable Mobility and Transition to a Low Carbon and Climate Resilient Society. Engagement with the relevant local authorities, LDA and NTA and infrastructure providers will continue to allow strategic planning for large-scale sustainable development projects to commence at the locations identified, and at locations that come forward during the NPF period. This work will facilitate the identification and development of the necessary policy provisions at national, regional and local levels, and enhanced institutional and funding arrangements required to accelerate delivery.</p> <p>The two Departments are also reviewing opportunities for better integration of land use and transport in the regional centres. While locations outside of the metropolitan areas may not be suitable for large-scale TOD, the principles of TOD can be applied at local level to support compact development, sustainable mobility and climate targets.</p>	<p>Support and suggest cross referencing with NPO 10.</p> <p>Request adding a reference to the importance of Local Authorities as a leading body in delivering strategic, area based and local transport plans and infrastructure.</p>
	<p>National Policy Objective 69A 95 <i>The Government will work to establish the necessary institutional and funding arrangements to support the development and accelerated delivery of Transport Orientated Development at suitable locations in conjunction with the ongoing programme of investment in the public transport network.</i></p>	<p>Support and suggest cross referencing with NPO 10.</p>
<p><i>New</i> <i>NPO 102</i> <i>Page 153</i></p>	<p>National Policy Objective 72d 102</p>	<p>Support this approach and welcome early engagement with Local Authorities to establish their role in the development of</p>

National Planning Framework 2018	Draft Revised National Planning Framework 2024	
	<p><i>Develop and implement new approaches to measuring and monitoring compact growth in cities and larger settlements aligned to increased digitalisation of the planning system.</i></p>	<p>this tool and its implementation at local level.</p>

Changes to National Strategic Outcomes

See main submission document, Chapter 4 ‘Building on Strategic Opportunities’.

National Strategic Outcome 1 – Compact Growth		Feedback
<i>Reference page 154</i>	URDF quantified to €2 billion	
<i>New text on active land management Page 155</i>	<p>Land Activation and Active Land Management</p> <p>The Government is advancing a number of land activation and active land management measures through legislation to ensure that the potential for urban development in the built up area of cities and towns, with proximity to services and good quality public transport, can be accelerated.</p> <p>The Residential Zoned Land Tax (RZLT) introduced under the Finance Act 2021, will come into effect in 2025. The tax is aimed at encouraging the activation of development on suitably zoned and serviced land for housing.</p> <p>Proposals for the introduction of Urban Development Zones (UDZs) are being progressed through the Planning and Development Bill 2023 in order to prioritise the planning and delivery of plan-led proposals for the development of areas with significant potential for growth, with an emphasis on the provision of the infrastructure required to support delivery. These zones will involve a focus on the creation of mixed-use neighbourhoods with high levels of accessibility having regard to existing or planned public transport links, including opportunities for Transport Orientated Development, in particular in the Dublin Metropolitan Region.</p> <p>Proposals for legislation to support Land Value Sharing (LVS) are also being progressed to ensure that the State can secure a proportion of the uplift in land values that results from public decisions to zone or designate land for development. The intention is that the obligations secured will be used to provide the infrastructure needed to enable housing and related development to take place, in addition to providing the services and facilities that communities need.</p>	Support. The delivery of those mechanisms need to be discussed with the Local authority and appropriate resources need to be allocated to make them effective.
National Strategic Outcome 2 – Enhanced Regional Accessibility		

<p><i>New text</i> <i>Page 170</i></p>	<p>The interurban rail network plays a key role in offering sustainable travel alternatives to private car travel and broadens labour catchments, benefitting the international competitiveness of our major cities. There is further potential, as identified within the Draft All Island Strategic Rail Review, to enhance rail links between our major cities (including an intercity spine connecting Belfast, Dublin and Cork) with increased capacity, line speed and frequency of service.</p> <p>It is also important that vehicular traffic is removed from urban areas, where possible, to enable the efficient use of the national road network, in particular for commercial traffic. This will also increase user safety and remove traffic congestion in urban and rural centres.</p> <p>Cycling will also play a role in enhancing regional connectivity, through the implementation of the National Cycle Network, published in 2024. This network will integrate greenways, the EuroVelo network and regional and local cycling routes and will support economic growth of regional urban areas of 5,000+ population as well as priority tourist destinations.</p>	<p>Support. Focus on commuter rail within the City-regions and metropolitan areas should be prioritised, in line with compact growth objective.</p>
<p><i>Specific reference to Cork City Northern Transport Project</i> <i>Page 156</i></p>	<ul style="list-style-type: none"> ○ Advancing orbital traffic management solutions, including the Galway Ring Road and the Cork City Northern Transport Project M8/N25/N40 Dunkettle Junction upgrade (approved) in Cork; 	<p>Support, the CCNTP is an important strategic infrastructure for the City region of Cork.</p>
<p>National Strategic Outcome 4 – High-Quality International Connectivity</p>		
<p><i>Amended text referencing BusConnects</i></p>	<ul style="list-style-type: none"> ○ Enhancing land-side public transport access, particularly in public transport terms, such as through the MetroLink and BusConnects projects and associated road network capacity in Dublin; and 	<p>Support, a reference to same for Cork international airport, in terms of BusConnects and road network is important.</p>
<p><i>Amended text relating to Ports</i> <i>Page 158</i></p>	<p>In terms of our port facilities, National Ports Policy and the national hierarchy or tiering of ports recognises the long-term international trend in ports and shipping is towards increased consolidation of resources in order to achieve optimum efficiencies of scale. This has knock-on effects in terms of vessel size, the depths of water required at ports and the type and scale of port hinterland transport connections to serve ports and their hinterlands. It is evident that in the years ahead environmental, technological, demographic, and geopolitical developments will have a significant influence on how the sector evolves.</p> <p>Tier 1 ports account for 80% a very large proportion of national port freight traffic, and are located within close proximity to the cities of Dublin, Cork and Limerick respectively. Rosslare Europort, a Tier 2 Port of National Significance, has seen very significant growth in direct sailings to continental Europe as a result of Brexit. This surge in both passenger and freight traffic is likely to be a permanent feature. The</p>	<p>Support. The motorway connection to the Port of Cork is highly strategic for national and international connections.</p>

	<p>respective and their role of each of Ireland's main ports will be considered in tandem with long- term infrastructural requirements as part of the RegionalRegional Spatial and Economic Strategy and Metropolitan Area Strategic Plan processes. The detailed above. For example, tThe long-term sustainable development of our ports also requires strategic transport connections. Nationally, the following infrastructure objectives have been identified:</p> <p>Ports</p> <ul style="list-style-type: none"> ○ Improve Maintain and enhance land transport connections to the major ports including: ○ Improving Provide motorway access connectivity to Port of Cork's Ringaskiddy Port. 	
<p>National Strategic Outcome 5 – Sustainable Mobility</p>		
<p><i>Amended text</i> <i>Page 159</i></p>	<ul style="list-style-type: none"> ○ Deliver the key public transport objectives of the Transport Strategy for the Greater Dublin Area 202216-204235 by investing in projects such as MetroLink, DART+, Luas and BusConnects in Dublin and Eastern Region and key rail and bus-based projects identified by the NTA in the other cities and towns, 	<p>Direct references to Strategic Transport infrastructure needed in Cork Metropolitan area to deliver TOD are needed here: BusConnects, Cork Commuter Rail, Cork Ligh Rail Transit.</p>
<p>National Strategic Outcome 6 – A Strong Economy Supported by Enterprise, Innovation and Skills</p>		
<p><i>Amended text</i> <i>Page 161</i></p>	<p>A competitive, innovative and resilient regional enterprise base is essential to provide the jobs and employment opportunities for to enable people to live and prosper in the regions. The Government's White Paper on Enterprise 2022-2030 sets out how this will be achieved by:</p> <ul style="list-style-type: none"> ○ Integrating decarbonisation and net zero commitments ○ Placing digital transformation at the heart of enterprise policy ○ Advancing Ireland's FDI and trade value proposition ○ Strengthening the Irish-owned exporting sector ○ Enabling locally trading sectors to thrive ○ Stepping up enterprise innovation ○ Building on strengths and opportunities <p>A key focus of the White Paper on Enterprise is to ensure the creation of jobs in every part of the country and facilitate balanced regional development. The enterprise agencies, Local Enterprise Offices and Regional Enterprise Plans play a significant role in strengthening the enterprise ecosystem across Ireland. This enables entrepreneurs, microenterprises, Small and Medium Enterprises (SMEs)⁵⁸ and FDI to prosper in all regions. Specifically, we want to achieve and maintain</p>	<p>Support, references to Competitive Clusters within the metropolitan areas and City regions would strengthen the balanced regional development approach.</p>

	<p>sustainable full employment and for unemployment not to exceed one percentage point above the national unemployment rate in any region, while also achieving greater productivity convergence across our domestic enterprise base...while also achieving greater regional productivity convergence. to bring unemployment rates down to within one percentage point of the national average in all regions and achieve regional productivity convergence so all regions are within ten percentage points of the average outside Dublin and international comparators. The work of Enterprise Ireland (EI), IDA Ireland and the Local Enterprise Offices will be critical to achieving this ambition.</p> <p>We will achieve this through: Key areas of focus include:</p> <ul style="list-style-type: none"> ○ Supporting entrepreneurialism, small businesses and building competitive clusters; ○ Attracting and sustaining talent and boosting human capital in all regions; and Digital and data innovation; and ○ Promoting regionally balanced investment and jobs creation outside of Dublin. <p>Targets set out in the White Paper on Enterprise 2022-2030, seek to ensure that at least half of all FDI investments from 2021- 2024 will be to locations outside of Dublin and over two-thirds of new jobs created in Enterprise Ireland-assisted firms will be outside of Dublin.</p>	
<p>National Strategic Outcome 8 – Transition to a Low Carbon and Climate Resilient Society</p>		
<p><i>New text</i> <i>Page 165</i></p>	<p>Climate change is expected to have diverse and wide-ranging impacts on Ireland’s environment, society, and economic development, including on managed and natural ecosystems, water resources, agriculture and food security, human health, and coastal zones. Our low-lying areas and cities and many rural areas are potentially vulnerable if we do not take the appropriate steps to better manage the impacts of climate change.</p> <p>The Climate Action and Low Carbon Development (Amendment) Act enacted in 2021 commits to a binding target to reduce greenhouse gas emissions by 51% and increase the share of electricity generated from renewable sources to 80% over the decade (2021 – 2030), and to achieve net-zero emissions no later than 2050.</p> <p>The national climate objective is to achieve a competitive, low-carbon, climate-resilient, biodiversity rich, and environmentally sustainable and carbon neutral economy by 2050.</p>	<p>Support. The urgency of the Climate crisis should be highlighted with the need for transformative actions at scale. The role of Cork and Dublin in accelerating NPF implementation is a key way to kick-start Ireland’s transition. The two cities participation in the 112 city Net Zero Cities Mission should be mentioned, recognising that the success of the mission requires enhanced support from the NPF and provides a significant opportunity for Ireland to try new approaches and learn from them, across all key sectors, but especially the built environment, energy systems, and transportation, which can then be rolled out across the country.</p>

	<p>Sustainable land use management is required in order to achieve a balance between the built environment, natural environment, biodiversity and climate. The NPF is committed to the achievement of compact and sustainable growth, supporting the provision of sustainable transport options, water services delivery and the delivery of renewable energy development while protecting and where possible enhancing and restoring our natural environment in order to ensure sustainable development for our planet and future generations.</p> <p>Adaptation measures will be required to respond locally specific, place-based responses, which address not only climate impacts but also integrate coherently with local social, economic and ecological systems.</p> <p>The electricity sector faces a significant challenge to meet its requirements under the targets set out in Climate Action Plan 2023. Electricity will also play a key role in the decarbonisation of other sectors through electrification, including transport, heating, and industry. The accelerated delivery of additional renewable electricity generation is therefore essential for Ireland to meet its climate targets, reduce its greenhouse gas emissions, and improve its energy security by reducing reliance on imported fossil fuels and diversifying its electricity supply.</p>	
--	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

Table 2: Additional specialist Feedback on Draft Revisions to the NPF

Reference	Requested Additions/Revisions to the Draft	Cross ref. Draft Doc
The application of CSO's "Built Up Areas" (BUA's)	<p>The revision of the NPF includes updates based on the 2022 Census population figures and proposed revised population targets to 2040. These are based on the CSO's "Cork City and suburbs" geography, which appears to match the CSO's "Built Up Areas" (BUA's) geography, newly defined CSO areas.</p> <p>The BUA for Cork City differs from the City's designated administrative boundary, including/excluding notable areas within both the Cork City Council and Cork County Council administrative boundaries. The use of the BUA for Cork City presents clear challenges in the administration and monitoring of NPF population and employment targets and related NSO's and NPO's (e.g. NPO 4 – 50% future pop and employment target within the five city and suburbs). It</p>	NPO 1 (b) NPO 4 Tab 2.1

	<p>takes in large portions of hinterland area, in contradiction with the compact growth NPF objective and does not speak to either the administrative or the spatial planning of the urban area.</p> <p>The BUA for Cork City or Metropolitan area does not aid the planning or administrative management and monitoring of important NPF targets, including the statutory political decision-making processes. These issues have been previously raised with the CSO as part of their regional briefing sessions on BUA's made to LA's back in June 2023. Feedback on this issue and the resolution of BUA definition and application is critical.</p>	
Cork Docklands Case Study	<p>The inclusion of Cork Docklands as a Case Study for the Cork City and Metropolitan Area is welcome and supported. Request the following planning statistics are updated to reflect the most up-to-date data (August 2024):</p> <ul style="list-style-type: none"> • Planning approvals: 3,198 units • Planning pipeline: 1,004 units (SHDs awaiting decision: 823units + LRD 181 units) • Commencement Notices: 1,304 units. • Under Sustainable Travel please update the statistics as follows: 75% of journeys by walking, cycling or public transport 	Cork Docklands Case Study (page 44)
Climate Transition	<p>SDG 13 indicator 13.1.3 measures the number of LA with climate risk management plans. All 31 local authorities in Ireland have adopted their LACAPs. Given LACAP and the assigned role to implement national policy at local level this would be useful to reference. Also, Box on p132/133 on policy / planning frameworks does not reference local authority action plans.</p>	Climate Transition and Our Environment (p131 - p132)
Mission City Case Study	<p>The NPF revision should add a case study highlighting the participation of Cork and Dublin as Ireland's two participating cities in the EU Mission for Climate Neutral and Smart Cities, with associated commitments to accelerate NPF actions in every sector.</p> <p>Both cities, with the support of the Irish Government, have committed to achieve net zero emissions by 2030 through systems change. The cities offer the opportunity to trial and scale up transformative climate actions that are built on a whole-of-city approach. This is an opportunity to frame the NPF through the lens of the two biggest cities accelerating climate transition with support of National Government and state agencies, working across all relevant sectors.</p>	Climate Transition and Our Environment (p131) NSO 8 (p182)
Heritage and Place Making	<p>The NPF review should emphasise the role of adaptive reuse of our heritage stock as a way of enabling compact growth which protects and enhances the distinctive character of the city and its</p>	Pg 46-47 & 96. Section 4.5

	role in ensuring an attractive an enticing environment for city centre living. This is consistent with the Town Centre First Policy and Framework 2022 which is being actively pursued by Government.	Section 6.1
Green and Blue Infrastructure (GBI) and Local Biodiversity	<p>The NPF review should further highlight the importance of the conservation of and planning for Green and Blue Infrastructure (GBI) and local biodiversity features (wetlands, woodland, rivers, stream, scrub, grasslands and other habitat features).</p> <p>Many of these sites GBI and biodiversity assets fall outside the areas or designations where mandatory ecological assessments are required, and fall outside the remit of AA and NIS. Therefore, a higher acknowledgement of the importance of and value of these local ecological features, and ecological corridors is essential.</p>	General
Biodiversity Net Gain (BNG)	The revised NPF does not sufficiently emphasize the need for Biodiversity Net Gain to be implemented all developments. Biodiversity net Gain is a key principle required to support Ireland in its ambition to reverse biodiversity loss. This needs to be reflected in the NPF review, and NSOs need to be revised accordingly.	General

Appendix 2: Infrastructural Requirements for Key Growth Areas in Cork City Area

Key Growth Areas in Cork City		
	Cork City: Key Growth Areas	Development Potential & Infrastructure Requirements
UNDERUTILISED SITE CLUSTER	Model Farm Road A number of underutilised sites are being considered for redevelopment, densifying an existing city inner suburb that is less than 3km from the city centre. 3 sites are part of the LDA Relevant Land register.	Potential Yield to 2040: 1,500 residential units Infrastructure Investment Needs: <ul style="list-style-type: none"> ▪ BusConnects Corridor E and F: update needed on the finalisation of the bus routes. ▪ The Light-rail project would help unlock density on a TOD corridor in this inner suburb area, connecting a cluster of underutilised sites to the new planned Cork Science and Innovation Park.
	City Centre South Group of city centre infill and windfall sites, including two sites identified by the LDA in the Relevant Land register.	Potential Yield to 2040: 1,350 residential units <ul style="list-style-type: none"> ▪ BusConnects Corridor L and H: update needed on the finalisation of the bus routes. ▪ Transfer of public lands is required for LDA projects to start.
	Mahon Current land-use is focused on office, business and retail, key sites are identified for TOD-driven housing development to complement these uses. The Jacobs's Island site is the most advanced with two active SHDs on site. Other brownfield or underutilised sites are earmarked for future development.	Potential Yield to 2040: 3,600 residential units <ul style="list-style-type: none"> ▪ BusConnects Corridor J: update needed on the finalisation of the bus route. ▪ The Light-rail project will help unlock density and connect this residential and employment area to the rest of the city. ▪ Expansion and upgrading of amenity areas and walking/ cycling routes is required.
	City Docklands A number of catalyst developments have been completed to date, including the Marina park, 1000,000m2 office blocks and pedestrianisation and cycle lanes. The first planning permissions are being granted, with currently 3 198 total units granted and 1 304 commenced, and 1 004 units pending permission (as of Q2 2024).	Potential Yield to 2040: 20,000 residential units & 25,000 jobs. URDF funding of €353.4 million from DHGLH will enable a total forecasted investment in enabling infrastructure of c.€650m. <ul style="list-style-type: none"> ▪ Rail and light-rail investment is crucial to ensure that this development area is focused on sustainable compact growth. This includes the R624 (Cobh Road to Marino Point) which is needed for the relocation of the Gouldings site in the Docklands. ▪ Investment in drainage and flood mitigation infrastructure. ▪ River crossings are needed to unlock the full potential of the area, linking to the upgrade of Kent Station as a transport hub. ▪ Education and health infrastructure in the area is required, supported by the relevant departments and national agencies. ▪ Public realm including quayside amenities are required. Marina park phase 1 was delivered in 2022. Phase 2 went to public consultation in 2022 and works have begun in 2024.
MEDIUM-TERM	North Blackpool Kilbarry	Potential Yield to 2040: 8,000 residential units & 1,000 jobs.

<p>North Blackpool / Kilbarry Urban Framework plan is being developed for the northern expansion area which is a key expansion area underpinned by a planned new train station. Important portions of the area are under public ownership. A large portion of underutilised IDA lands have been identified by the LDA for long-term development. A large public site has received LIHAF funding for preparation works for social and affordable housing.</p>	<ul style="list-style-type: none"> ▪ Strategic transport has to be planned to unlock this area: <ul style="list-style-type: none"> ○ Proposed New Rail Stations - The whole area is underpinned by the proposed new train station at Kilbarry. ○ Multimodal Northern Distributor Road will connect the northern part of the landbank to the rest of the north of the city allowing for future public transport and cycle routes. ▪ Blackpool river Flood relief scheme runs through the area and will have implications for land-use. ▪ Water and waste-water provision must be reviewed given the constraints in the northside of the city. ▪ Sustainable Urban Drainage Strategy is needed to plan for the transformation of this sloped part of the city in a sensitive manner. <ul style="list-style-type: none"> ▪ Investment in the new planned North West City park will provide necessary community and recreational spaces, and connect to the ecological corridor along the Glenamought River Valley. ▪ Community services, including education and recreation facilities are needed to cater for this new neighbourhood.
<p>Ballyvolane East and West</p> <p>Significant areas of land on either side of Ballyhooly Road to the northeast of Ballyvolane are identified for future growth including residential, employment, local services and open space. Ballyvolane West is the most advanced part of the area with two permitted SHDs already in place. Ballyvolane East is primarily zoned for residential, Tier 2. Currently planning permissions are being granted while infrastructure plans are still awaited, resulting in a developer-led expansion rather than a plan-led one. A central area in between the two expansion growth areas was identified as Reserved land, for future development.</p>	<p>Potential yield to 2040: 14,250 residential units</p> <p>Infrastructure and service issues need to be addressed to unlock full potential of the area in a sustainable way. Ballyvolane Urban Expansion Area Phased Infrastructure Packages need to be planned for.</p> <ul style="list-style-type: none"> ▪ The Planned Multimodal Northern Distributor Road is key to unlock this landbank. Several pre-planning applications whose transport access depends on the road delivery had to be refused. This represents up to 4 000 units currently. ▪ Water and waste-water provision must be reviewed given the constraints in the northside of the city. ▪ Sustainable Urban Drainage Strategy for the entire area needs to be reviewed and a rain water management strategy is required to coordinate the new developments happening simultaneously in the area, with impacts on downstream drainage.
<p>South Glanmire</p> <p>Northern site has an SHD that is partly delivered (Ballinglanna SHD) and has entered pre-planning to increase the number of units for the delivery of the last phase.</p>	<p>Potential yield to 2040: 2,500 residential units</p> <p>Southern landbank requires significant road upgrades to be delivered. Currently limited in terms of public transport, connection with the planned multimodal northern distributor road is key to connect sustainable transport and active travel to the area.</p>
<p>Ballincollig & Maglin</p> <p>Ballincollig experienced significant economic growth in recent times. Future housing and population growth in Ballincollig will be concentrated in the Maglin Area to the south of the town and other zoned lands to the west and on infill and brownfield lands within the existing built-up area of the town. Additional windfall sites are also identified within the existing town footprint, infill sites and light industrial areas to be</p>	<p>Potential yield to 2040: 9,200 residential units</p> <ul style="list-style-type: none"> ▪ Road and water infrastructure issues are to be resolved in the short and medium term to unlock Maglin landbank. ▪ Irish Waters has indicated the need for significant upgrades for the City Regeneration and Expansion Area of Ballincollig South. ▪ The light-rail is key to unlocking the underutilised sites within the town centre. ▪ BusConnects (Corridor E): update needed on the finalisation of the bus route.

	redeveloped for housing in the medium term with a TOD perspective.	
	Castletreasure	Potential yield to 2040: 1,850 residential units
	Housing delivery is advanced with two large SHDs being delivered and future plans for next phases. Around 500 units already delivered in the 2021-2022 period.	<ul style="list-style-type: none"> ▪ BusConnects Corridor I: update needed on the finalisation of the bus route. ▪ New schools in Douglas are needed to support community infrastructure delivery.
LONG TERM	Blarney & Stoneview	Potential yield to 2040: 10,000 residential units
	Future growth in Blarney is to be accommodated at medium-term with Tier 2 New Residential Neighbourhoods and in the long-term with reserved sites in the Ringwood and Stoneview landbanks, depending on delivery of the new train station. Relevant Planning Permissions in area: SHD granted at Monacpa for 143 units. Housing delivery has not commenced in the Stoneview area, dependent on new train station delivery.	<ul style="list-style-type: none"> ▪ Unlocking the new expansion area of Stoneview is dependant on the delivery of the new planned train station indicated in CMATS. ▪ New road over rail bridge and improvements to existing bridge; ▪ New link road to Blarney via Lower Sheen Road. ▪ Local Road improvements required including R617 and Station Road upgrades ▪ Irish Water has indicated large infrastructure upgrades required for water and wastewater in the Stoneview area (City Capacity Study 2021). ▪ Local road upgrades and finalisation of N/M20 Limerick-Cork route needed, including active travel. ▪ Drainage wastewater upgrade required for Blarney area.
	Tivoli	Potential yield to 2040: 5,000 residential units and 5,100 jobs.
	The unlocking of the Tivoli area is a medium to long-term plan, dependent on the relocation of the Port of Cork activities downstream. Cork City Council has drafted an Area Based Transport Assessment (ABTA) for Tivoli Docks, in accordance with the CMATS. The ABTA applies the principle of Transport Oriented Development (TOD) by setting out a 70% sustainable mode share target	<ul style="list-style-type: none"> ▪ A new central train station serving the entire catchment area, will provide high frequency services to/from strategic employment locations at Cork City Centre, Little Island and Carrigtwohill. ▪ A central bus corridor, delivered under the BusConnects programme, will provide high-frequency services to the Cork City Centre, UCC, MTU and wider city. ▪ Upgrade to access roads including second access, park and quayside amenities will also be needed. This includes the delivery of the upgraded M28 needed to unlock the Tivoli Docks due to needed relocation of Port activities. ▪ Relocation of SEVESO uses. <p>Site remediation.</p>
	Tramore Road	Potential yield to 2040: 4,800 residential units
	Two key brownfield / underutilised sites are part of this area. One SHD has been granted for 609 units. The current industrial estate is earmarked for longer-term development.	<ul style="list-style-type: none"> ▪ BusConnects (Corridor K and H): update needed on the finalisation of the bus routes.
	Southern Corridor	Potential yield to 2040: 10,000 residential units
Long-term landbanks, not currently zoned or reserved. These lands would form part of a longer-term strategic growth vision for the city, underpinned by the multi-modal Southern Distributor Road.	<ul style="list-style-type: none"> ▪ Future long-term landbank to be unlocked by the planning and delivery of the Multi-modal Southern Distributor Road proposed in CMATS. 	
Carrigrohane	Potential yield to 2040 and beyond: 16,500 residential units	

A small part is indicated as reserved land. The lands between Ballincollig and the western suburbs of Cork City, some 220 ha in extent, represent a strategic future growth location for Cork City due to its location: - between the City and Ballincollig; • along the proposed Light Rail Transit route; • close to services such as employment, higher education and health care; • adjacent to the proposed Cork Science and Innovation Park. However, the scale of the site requires a multi-disciplinary master planning approach in order to provide for the comprehensive and co-ordinated development of these lands.

- Unlocking this longer-term landbank centres around the plans for the proposed Light-Rail transit route.

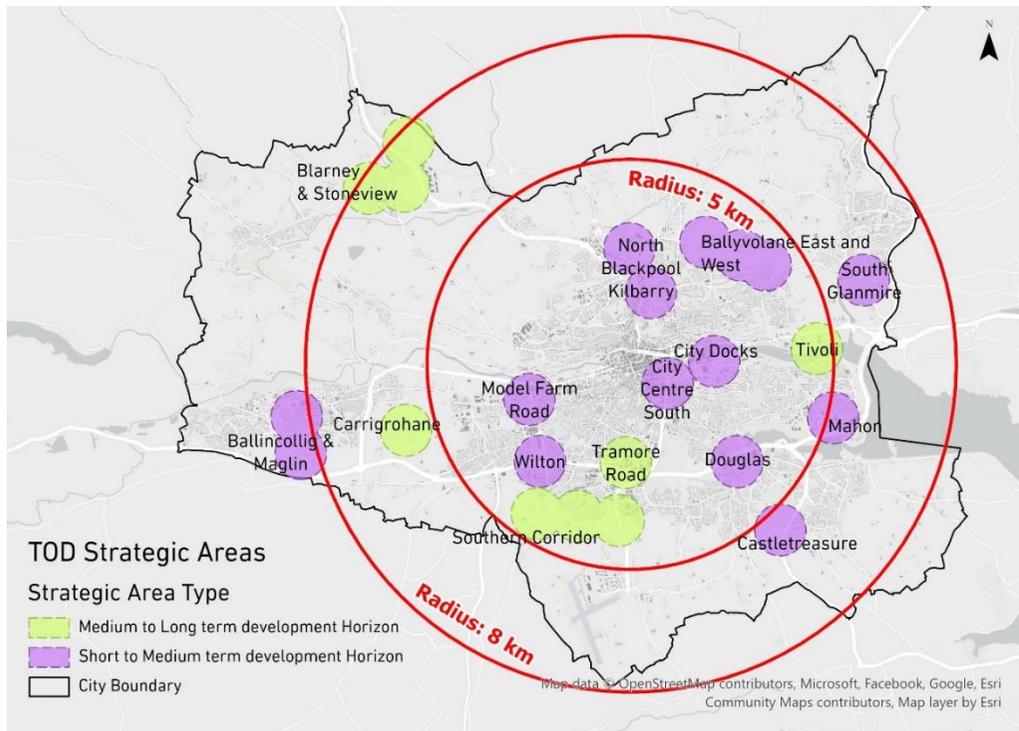


Figure 7: Potential for Compact Growth within the Cork City administrative boundary, medium and long-term. (Source: Cork City Council, TOD Report).

