

Submission to Cork City Council by the:

Cork Business Association

to the

Draft Cork City Development Plan 2022-2028



October 2021

1. Executive Summary

- 1.1. This submission is presented to Cork City Council by the Cork Business Association [hereinafter referred to as the CBA] and represents the collective views of its members in response to the Draft Cork City Development Plan 2022-2028.
- 1.2. The **CBA welcomes the opportunity to make a submission** to the proposed plan and as a key stakeholder representing over 200 businesses, **considers active engagement between the Local Authority and businesses at all stages of the plan making process** an imperative component of successfully implementing any proposed plan/strategy. In keeping with the core mission and objectives of the CBA, the CBA strongly advocates any initiatives and policy objectives which will create a better business environment for traders, employers, customers and tourists. With this in mind, the CBA has placed a high level of importance on scrutinising any proposed plans for the future development of Cork City against these key indicators.
- 1.3. This plan is potentially transformative, Cork City needs radical change, leadership and a clear policy vision to realise the ambitious growth earmarked for the newly expanded area over the next 6 years and beyond. The CBA is broadly supportive of the intention on the part of the City Council to move towards a more compact growth strategy, to align population growth and public transport provision, to grow the Docklands [North, South and Tivoli] and create a framework for growth predicated on achieving key social, environmental and economic imperatives. Growing the contiguous built up area of the wider city and city centre in residential terms is key particularly along the west to east proposed LRT corridor as well as along the suburban rail corridor [including along the new stops at Kilbarry/Blarney etc] is particularly welcomed.
- 1.4. **The principal issue from the perspective of the CBA is housing: In order to :**
- **celebrate the continued success and expansion of the Cork office sector;**
 - **support the currently vulnerable retail and hospitality sector;**
 - **provide the critical mass necessary for public transport to operate efficiently;**
 - **realise the strategic vision of the '10 minute city' concept; and, support spending on public realm, place quality and public amenities housing is put forward as the number one priority of the Cork Business Association for the next development cycle and beyond.**

- 1.5. Failure to deliver the quantum of housing needed will have a knock on negative/restrictive impact on all of the businesses and sectors in the city.
- 1.6. This Submission is appropriately being made on the same day as the government launches the 2021-2030 National Development Plan (NDP). While full details of the NDP have yet to be announced, it is confirmed as being the largest public capital investment programme in the history of the State in relation to transport and housing and this is broadly welcomed. A key element of the investment is that the NDP will commit to €35bn in spending on transport up to 2030, of particular relevance to this submission and Cork generally is that €185m has been committed to the Cork Commuter Rail service which runs from Mallow to Midleton via Blarney and Cork City, with a ten-minute frequency, and this is estimated to be in place within five years.
- 1.7. This will be hugely transformative for Cork City and the entire Cork region and is realisable within the timescale of this Development Plan. Therefore, the forthcoming Cork City Development Plan should be adjusted to take account of the National Development Plan and the commitments to spending and associated timelines therein. The delivery of a growth strategy which aligns with high quality public transport provision is the most important objective within the plan and needs to be expanded upon.
- 1.8. There is an opportunity for Cork City Council to take full advantage of the timing of this announcement to make key adjustments to increase the amount of land zoned for housing along this corridor as the infrastructure [unlike other large scale infrastructure projects] will be in place within the lifetime of this plan. A rail based settlement growth strategy is key to achieving sustainable development outcomes.
- 1.9. The CBA agrees that the development of the Docklands is imperative and a key priority, however, there is no contingency in place for the failure of housing in the Docklands to be realised [11% of all growth is earmarked for the Docklands] particularly in consideration of the fact that there are so many variables which could prevent its timely development and these are out of the control of Cork City Council.
- 1.10. Ireland faces an acute housing crisis in which annual housing delivery is failing to meet national targets of 30,000 new units per annum – as will be discussed later, Cork is also failing to deliver the growth needed to provide an effective counter-balance to the growth in the Greater Dublin Area that

National Policy has been attempting to address since the publication of the National Spatial Strategy in 2002.

- 1.11. The CBA, in pursuit of the best outcome for its members and the cultural, environmental, social and economic wellbeing of Cork City Centre is of the view that **a number of changes are needed to be made to the draft City Development Plan if the strong aspirations for growth are to be realised.**
- 1.12. The CBA welcomes the approach to providing a significant amount of housing in the Docklands, it is one of the most significant tracts of brownfield land in the entire country and its potential to achieve national level aspirations must not be underestimated. The CBA is of the view that the North Docks and Tivoli Docks present an important opportunity to deliver housing through the creation of high quality urban neighbourhoods and suggests that indicative masterplans be undertaken [immediately] for these areas. The CBA cautions against not having a contingency plan in place for the failure of the Docklands to be developed to the extent prescribed [6,000 units] in the next 6 years and are somewhat apprehensive as a result. The CBA suggests that a review take place after a period of 2 years and if 2,000 units have not been delivered/are under construction in the Docklands then additional lands should be considered.
- 1.13. The severity of the supply [rental and sales] issues currently characterising the Cork housing landscape are understated in the Draft Plan – at the time of writing this submission there are 48 properties for rent in the entire city area [Montenotte – Blackpool – Wilton – Rochestown] this [in the absence of residential construction [particularly private rental and private sales] is only going to worsen. The City cannot afford to wait another 6 years for the next Development Plan to look back and say not enough was done to encourage housing development in the city functional area coordinated, urgent and proactive [not reactive] action is needed to address this worsening situation.

2.0 The Submission - Policy Context

- 2.1 The 'National Planning Framework' provides the National Planning Policy Context for the future development of Cork [Ireland 2040], which succeeds the National Spatial Strategy. This document has legal standing and forms the overarching document in the hierarchy of plans in Ireland. It provides guidance for national planning priorities and streamlines relevant Government policies and informs investment on national and regional development imperatives.
- 2.2 The NPF is predicated on the assumption that by 2020 there will be an additional one million persons in Ireland and to effectively plan for and manage this growth it is important that key priorities are set

out at the highest level to be implemented by all local authorities in the pursuit of a shared vision for the planning and development landscape of the country.

2.3 The key message of the 2040 NPF is threefold:

- Growing our regions, their cities, towns and villages and rural fabric.
- Building more accessible urban centres of scale.
- Better outcomes for communities and the environment, through more effective and coordinated planning, investment, and delivery.

2.4 National Planning Framework also has statutory bases. Unlike the National Spatial Strategy (NSS) 2002 which was not a legal document it was a 20-year spatial plan direct development and investment to those locations that had the infrastructural capacity to take development. It designated a series of hubs and gateways which were earmarked for significant growth which appeared to be an unpopular choice amongst those who were not within these areas and was an ineffective attempt to counterbalance the strong growth that had occurred in the Dublin region in the years leading up to the NSS. The failure of the planning system to steer growth in a compact manner towards the cities and urban areas had far reaching implications for Cork City and its failure to develop and grow at the pace and scale anticipated.

2.5 To rectify this, according to the NPF **“There will be a major new policy emphasis on renewing and developing existing built-up areas rather than continual expansion and sprawl of cities and towns out into the countryside” [2017:8]. The CBA welcomes the fact that Cork City will be legally obliged to adhere to the provisions of this.**

2.6 One of the key aspirations of the NPF is to address the issue of our regional cities and to ensure that all of the regional cities grow at ambitious rate. The NPF states that the regional cities of Cork, Limerick, Galway, and Waterford are growing but not at the scale or pace required to operate “as realistic alternatives to Dublin” and that this needs effective and coordinated action to remedy.

2.7 According to the ESRI the population of Ireland will increase by almost one million people or by 20% over 2016 levels, to around 5.75 million people by 2040 which will give rise to a need for an additional half a million new homes by 2040.

2.9 The ESRI also projecting an additional 660,000 jobs to 2040 to occur and in line with international trends, that there will be a shift towards a knowledge economy as well as an expanding role for the services sector. The NPF makes ambitious targets for the four cities outside of Dublin stating that: “Cork, Limerick, Galway and Waterford [need] to each grow by at least 50% to 2040 and to enhance their significant potential to become cities of scale. This means enabling the four cities to grow by more than twice as much to 2040 as they did over the 25 years to 2016. Focusing investment to improve the collective ‘offer’ within each of the four cities, i.e., infrastructure, liveability and choice in terms of housing, employment and amenities.”

City	Population 2016	Population Growth to 2040 ²⁷		Minimum Target Population 2040
		% Range	People	
Dublin - City and Suburbs	1,173,000	20-25%	235,000 - 293,000	1,408,000
Cork - City and Suburbs	209,000	50-60%	105,000 - 125,000	314,000
Limerick - City and Suburbs	94,000	50-60%	47,000 - 56,000	141,000
Galway - City and Suburbs	80,000	50-60%	40,000 - 48,000	120,000
Waterford - City and Suburbs	54,000	50-60%	27,000 - 32,000	81,000

Figure 01 Population Targets for Ireland’s Cities [Extract Table 4.1 Ireland 2040]

2.10 The population targets in the NPF certainly set out in an ambitious aspiration for Cork, in order to achieve this, it states that Cork needs to be an internationally competitive and sustainable urban environment. The NPF is also quite strong in stating that Irish towns can accommodate a significant amount of future population growth. Ireland 2040 states that “There is a need to encourage population growth in towns of all sizes that are strong employment and service centres, where potential for sustainable growth exists, also supported by employment growth” [Ireland 2040:58].

2.11 As can be seen from examining Figure 03 Ireland 2040 outlines a clear hierarchy for the urban centres outside the capital, with Cork being promoted as the State’s second city of international scale, fulfilling a nationally important role in counterbalancing the greater Dublin area. Limerick, Galway, and Waterford, in turn, are designated as key regional centres, and important locations for

supporting the regional development agenda. Cork City alone is expected to accommodate population growth in the order of 55% [115,000], which equates to the combined growth of Limerick, Galway, and Waterford cities over the next 25 years. This is a huge challenge for Cork; accommodating another 115,000 people in Cork City means achieving an average annual growth rate of 2.3% over the next 24 years; by comparison, the average annual rate of growth over the last 24 years was only 0.8% [34,600 total]. This is an enormous development and regeneration opportunity, requiring the provision of thousands of new homes and jobs in appropriate locations across the city region.

2.12 However, Ireland 2040 is not just concerned about population growth per se — as a planning vision, it is equally concerned **with how and where this growth will occur**. It takes a very strong position in tackling suburban sprawl and dispersed development, and for the first time introduces national policy that prioritises the use of undeveloped and vacant sites in the urban centres; for Cork, these national targets will require the provision of additional housing to accommodate 2,400 people every year up to 2040 — within the existing built-up area. Ireland 2040 quite correctly promotes policy for much more compact cities and towns, promoting developments in line with core planning principles relating to quality of life, access to services and public transport, place-making, employment-led growth, and environmental quality. By introducing defined targets for limiting suburban sprawl and dispersal, it is taking an ambitious step, and it means revisiting the way in which our urban areas have been evolving over the last few generations. **The Draft City Development Plan needs to drive this ‘vision’ to realisation through facilitation, communication, removing barriers to development and ultimately by translating the very clear language and direction of the NPF into a clear vision of how Cork City will be developed over the next six years.**

2.13 The Draft Plan focusses on what should be developed and where that development should go and needs to go further to state how this growth is going to be developed and what the local authority is going to do [both in forward planning and development management terms] in order to commit to helping these targets to be achieved. Such actions could include meaningful consultation with developers to ascertain what barriers can be removed, greater efficiencies at pre planning stage, greater use of the vacant site levy to free up sites [among others] and this is just in the housing sector – the Covid 19 pandemic has had a devastating impact on the tourism and hospitality and entertainment sectors, this development plan period for the full duration of the development plan should be seen as a ‘Transitional or Recovery Period’ whereby any proposal seen to improve a sector within the city [provided that it does not negatively impact another sector] will be welcomed in the first instance and supported [in principle] in the second.

2.14 Cork’s city centre has experienced significant change in recent years, with substantial physical and environmental enhancements following a sustained period of public and private and public sector investment and development. Much of the central retail and commercial core has been subject to major improvements and in spite of the Covid 19 pandemic there are indications that it has begun to consolidate itself as the primary economic, employment, cultural and retail centre of the region and, as an attractive, dynamic and viable urban centre. Its resilience during Covid shows what can be achieved by working together rather than working in silos and Cork City Council is urged to continue the supportive interactions that have become so valuable to the business sector in cork since the outbreak of Covid 19. A coherent city centre land use planning framework, accompanied by comprehensive and high quality public realm and urban design initiatives have created a city centre that has been quite resilient in maintaining its role as a retail and city centre destination and as a place of quality, character and vitality. However, the central area and historic core in particular, now face a number of important challenges and it is important that there is a clear vision of how the city centre will be developed, managed and promoted for the next few development cycles. While there have been a number of successful and large-scale public and private led developments which have strengthened its position, the city centre’s recent success and relative strengths should not disguise some of its immediate challenges and important vulnerabilities present, particularly in the historic centre. As such, there is a need for **Cork City Council to set a number of deliberative future development objectives to be underpinned by a number of strategic initiatives directed at promoting revitalisation and incentivising growth in certain pockets of the historic core.**

An Analysis of Housing Completions in Cork Since 1970

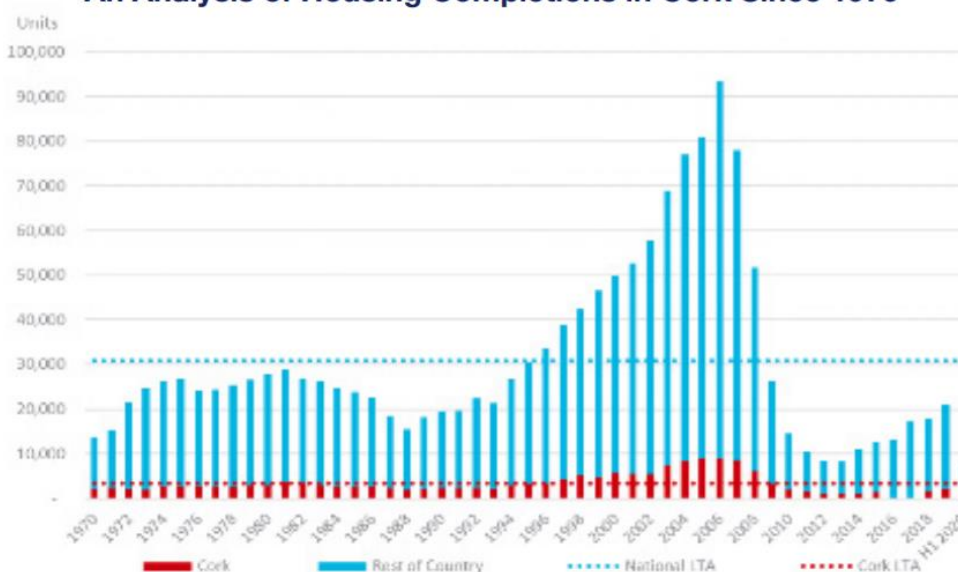


Figure 02 Housing Completions in Cork Since 1970

2.15 As can be seen from examining Figure 02, the number of houses completed last year and over the last few years in Cork is staggeringly low. Since the publication of the NSS in 2002 National Policy has dictated that the overconcentration of housing growth in the Greater Dublin Area needs to be balanced by significant growth in Cork. This simply has not been pursued with the vigour and tenacity [through the forward planning system] that it should be.

Cork City	Baseline Populations (2016)		Future Population Growth (2028)		Actual Population Growth (2028)	
	Existing Population	% of Total Population	Future Population	% of Total Growth	Actual Population Growth	Proportionate Growth Rate
City Centre	22,732	10.8%	26,218	7.0%	3,486	15%
City Centre Regeneration (new build)	–	–	23,945	2.4%	1,213	5%
City Centre Consolidation (re-use)	–	–	2,273	4.6%	2,273	10%
Docklands	1,667	0.8%	7,737	12.2%	6,070	364%
City Docks	1,667	0.8%	7,239	11.2%	5,572	334%
Tivoli Docks	0	0.0%	498	1.0%	498	–
City Suburbs	141,808	66.7%	160,289	37.3%	18,481	13%
North East Suburb	26,841	12.7%	35,561	17.6%	8,720	32%
North West Suburb	23,125	11.0%	23,728	1.2%	603	3%
South East Suburb	51,605	24.5%	58,457	13.8%	6,852	13%
South West Suburb	40,237	19.1%	42,543	4.7%	2,306	6%
Urban Town	33,886	16.1%	54,650	41.9%	20,764	61%
Ballincollig	18,159	8.6%	29,003	21.9%	10,844	60%
Blarney	2,550	1.2%	5,881	6.7%	3,331	131%
Glanmire	9,903	4.7%	15,329	10.9%	5,426	55%
Tower	3,274	1.6%	4,437	2.3%	1,163	36%
Hinterland	10,521	5.0%	11,300	1.6%	779	7%
Hinterland Settlements (3)	1,792	0.8%	1,971	0.4%	179	10%
City Hinterland (Single Dwellings)	8,729	4.1%	9,329	1.2%	600	7%
NET Total (-25% site area)	210,853²	100%	260,194	100%	49,580	24%

Figure 03 Core Strategy Table indicating growth targets to 2028

2.16 **The delivery of the Docklands is [and should be] the key priority for Cork City Council [and Cork County Council as well as at a national level] it is 166 hectares of prime development land within a city centre and is a unique opportunity to deliver scale and quality development of an internationally recognised standard. The Seveso designations, the continued operation of Goulding’s Fertiliser plant and the reliance upon the Port of Cork to keep to their timeline for the relocation of the Port of Cork, are all variables which Cork City Council cannot control** which may affect the capacity of the Docklands to deliver the growth intended. There is no back up plan, the failure of the Docklands to deliver will result in a minimum under provision of 11% of the required growth [assuming all other areas grow as targeted]. It is understood that the relocation of the Port of Cork is contingent upon the M28 Motorway being developed, at judicial review stage construction has not even begun and, as such, it is contended that a contingency for the Docklands not being developed Growth Projections.

2.17 The Docklands should be developed as the number 1 priority – in Ireland’s second city the development of the docklands is an obvious aim and can and should happen in parallel to all other growth – it is suggested that contingency lands could be zoned so that in the event of one or more failures to deliver available land in sustainable locations should be considered for development. Cork City needs to accommodate significant levels of sustainable growth according to the NPF. This can only be delivered by intervening actively to facilitate development to locate in areas close to existing transport infrastructure and existing employment. At present, the most accessible and deliverable housing opportunities are in the Metropolitan region and in particular along the rail corridor/future Light rail system, which has significant capacity to deliver urban housing that is well-located, sustainable and urban in nature. The successful achievement of the growth targets will require strong leadership from the forward planning section and active planning and management to release and realise.

2.18 2020 and the first half of 2021 saw unprecedented upheaval across all of Irish society as a result of the Covid-19 pandemic. The housing market didn’t escape this upheaval, with the number of homes put up for sale in the first of the year [2020] down by over 50%. While things improved in the third quarter of the year, as the economy reopened, the volume of listings in any given month never even matched the same month in 2019, let alone offered signs of catch-up. For the year as a whole, just 49,000 homes were advertised – the lowest total in over five years [recent data from Ronan Lyons - Daft Quarterly Report Q4 2020]. It would appear that there is a high level of demand for housing in

Cork City and County, indicated by a low level of supply of high quality dwellings in both the rental and sales sectors and consistent quarter on quarter price increases - there is an extreme shortage of properties in the city which is having a consequent impact on the price of housing/accommodation to the extent that, we are now facing an affordability crisis in the private rental and sales sector.

2.19 It could be argued that this is due to the lack of supply of newly constructed units and the private rental sector is being overcrowded as a result this constrained supply is ensuring prices are kept inflated. There is an urgent need for proactive measures to remedy the current supply-side situation which is characterising and dominating the planning and housing landscape in the Cork City-region at the moment.

HOUSING DELIVERY IN CORK CITY 2016-2019					
YEAR	2016	2017	2018	2019	TOTAL
TARGET	2,000	2,000	2,000	2,000	8,000
DELIVERED	299	414	599	731	2,043
SHORTFALL	1,701	1,586	1,401	1,269	-5,957

Figure 04 Overview of Housing Delivery in Cork City 2016-2019

2.20 It is considered that in the context of the failures to achieve the growth targets set out at a national [NPF], regional [RSES's] and local [Core Strategy City Development Plan] level since 2016 the Development Plan is lacking in addressing this issue. An understanding of why this hasn't been achieved and a look at measured to address this will be crucial to the recovery that needs to happen in the housing sector in the City.

2.21 In order to achieve these ambitious targets and grow at the pace and scale prescribed for in national policy there needs to be more flexibility in zoning terms in certain instances as well as more land considered for residential development [in certain instances] and it is considered of national importance that in instances where land is available, well connected to public transport and serviced then development on said lands should be considered for development.

2.22 To address the tangible [and worsening] housing shortage it is considered that proactive and coordinated action needs to be taken to ensure that sites that are indeed suitable for residential development should be supported and that those site that are serviced and readily available for development are not precluded from being developed because of restrictive/inflexible policies

[possibly around car parking/building heights etc.] a single storey can make the difference between the viability of a scheme, in the absence of the LRT/Improved suburban rail [i.e. no quality public transport] car parking provision is of course imperative for large employers.

2.23 In addition the ambitious targets are to be achieved there is a need to address the disproportionate amount of houses vs apartments within the city and metropolitan area in accordance with the principles of planning and sustainable development. Houses generally are lower density and as such are less sustainable than apartments. 85% Housing in Irelands Second City is not sustainable.

2.24 The Draft Development Plan does not address this imbalance by acknowledging that apartment developments are less viable to develop than standard housing schemes and as such require more incentives to develop. The City Council have a great deal of autonomy with regards to development contributions, the development management system and using discretion with regards to car parking standards and it is suggested more is done to encourage the development of apartments in the city.

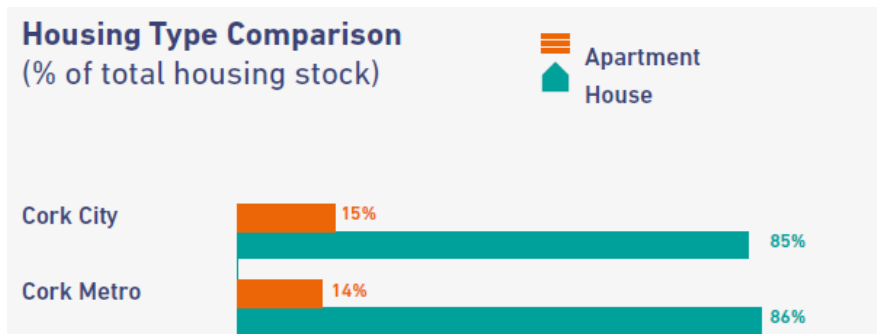


Figure 05 Breakdown of Housing Types [CSO]

2.25 Almost one million square ft of office space has been recently granted/is underway in the city at the moment [with more in Mahon and Little Island]

Developer	Location	Size
O'Callaghan Properties	Navigation Square Albert Quay	300,000 sq ft
John Cleary Developments	85 South Mall	49,514 sq ft
John Cleary Developments	Penrose Dock	247,570 sq ft
Clarendon and BAM	HQ @ Horgan's Quay	308,924 sq ft
Tower Holdings*	Prism on Clontarf Street	59,201 sq ft
*38,255 sqft permitted at the Port of Cork site [not included]		Total 965,209 sq ft

Figure 12 Recent Office Developments Completed/Under Construction in Cork City [Source Planning Enquiry System]

2.26 It is extremely unsustainable that the majority of these offices [if built occupied tomorrow] will be filled with people who will be commuting mostly by car to work as the majority of the new housing being built is in places like Carrigaline and Rural Glanmire. Whilst the Cork Metropolitan Area Transportation Strategy [CMATS] appears to address these issues of unsustainable transportation, the settlement strategy needs to align with the route of CMATS and be deliberately biased in favour of west-east development making Ballincollig, Bishopstown, the Docklands and Mahon the key future growth areas outside of the city centre. In simple terms, high quality housing is desperately needed in the city centre and in urban areas which are connected by green infrastructure/cycle routes.

3.0 Conclusion/Recommended Actions

3.1 The CBA has been representing the business sector in Cork City since 1957. Our extensive membership covers a wide range of businesses encompassing Retail, Hospitality, Financial, Property & Service companies. Our members currently provide a significant proportion of employment in Cork City and the association consists of ratepayers- which constitute 40% of Cork City Council's annual budget. The Association works closely with specific bodies to improve the infrastructure, development, cleanliness and up-keep of the City Centre. In addition, the Association works with other interested bodies for the general improvement and promotion of the City. One of the key objectives of the Cork Business Association is the promotion of Cork City to ensure it remains the key driver for the region and the prime retail and employment and tourism location in the south of the country. In simple terms the CBA is pro development.

3.2 For the first time in the history of the Cork Business Association, The CBA Executive Board agreed that the submission to the Draft Cork City Development Plan needed to be primarily about housing. For a business organisation this is unprecedented. The current housing situation in Cork is unsustainable and is not only a major problem for those in need of housing but also for employers and students - and now business associations. With a million square foot of office space underway in the city the question needs to be asked – where are all these future employees going to live? Cork City Council has a role to play in both the failure of housing to be delivered to date but importantly as the facilitator of future housing development. Cork City Council, in its treatment of proposals for housing development has the power to ensure the future success of Cork City, the City Region and all of its constituent sectors and businesses by addressing the housing problems and also by ensuring that housing is provided in the right locations – its not just about houses its about sustainable

communities and the NDP announcement for the €185million euro investment in the Cork Metro Rail is broadly welcomed and the City Council are appealed upon to make the necessary and required adjustments to the Development Plan to take account of the full suite of measures announced in the NDP to align spending on public transport with planned growth.

3.3 Notwithstanding the fact that the plan outlines ambitious growth targets for Cork City, there are a number of additions that the CBA would like to see made to the Development Plan relating to the Development Plan.

2.27 Action: at the end of every chapter there should be a set of actions of what can be done to achieve the aims and objectives outlined in the plan. In terms of housing for example the Draft Plan focusses on what should be developed and where that development should go and needs to go further to state how this growth is going to be developed and what the local authority are going to do [both in forward planning and development management] in order to commit to helping these targets to be achieved. Such actions should include meaningful consultation with developers to ascertain what barriers can be removed, greater efficiencies at pre planning stage, greater use of the vacant site levy to free up sites [among others] and this is just in the housing sector – the Covid 19 pandemic has had a devastating impact on the tourism and hospitality and entertainment sectors. In terms of the Hospitality Sector it could be the development of more festivals/ events/ relaxation of outdoor seating rules etc.

2.28 Action: This development plan period for the full 6 year duration of the development plan should be seen as a ‘Transitional or Recovery Plan’ and any proposal seen to improve/aid the recovery of a sector within the **city centre** [provided that it does not negatively impact another sector] will be encouraged and welcomed in the first instance and supported [in principle] in the second.

2.29 Cork’s city centre has experienced significant change in recent years, with substantial physical and environmental enhancements following a sustained period of public and private and public sector investment and development. Much of the central retail and commercial core has been subject to major improvements and in spite of the Covid 19 pandemic there are indications that Cork City has begun to consolidate itself as the primary economic, employment, cultural and retail centre of the region and, as an attractive, dynamic and viable urban centre. Its resilience during Covid 19 shows what can be achieved by working together rather than working in silos and Cork City Council is urged

to continue the supportive interactions that have become so valuable to the business sector in cork and the CBA since the outbreak of Covid 19.

3.4 Action: the forthcoming Cork City Development Plan should be adjusted to take account of the National Development Plan and the commitments to spending and associated timelines therein. The delivery of a growth strategy which aligns with high quality public transport provision is the most important objective within the plan and needs to be expanded upon.

3.5 Action: The CBA cautions against not having a contingency plan in place for the failure of the Docklands to be developed to the extent prescribed in the plan [6,000 units] in the next 6 years and are somewhat apprehensive as a result. The CBA suggests that a review take place after a period of 2 years and if 2,000 units have not been delivered/are under construction in the Docklands then additional lands should be considered.

3.6 The CBA recommends that where the Gross Development Value of a project exceeds 5million euro the benefit to the city should be one of the contributing factors to the decision-making process and flexibility be applied in those cases in light of the significant planning gain. For larger developments in particular until high quality public transport links are put in place a degree of flexibility in relation to car parking should be employed.

3.7 Other points which CBA members sought to be included relate to:

Purpose Built Student Accommodation should be strictly reserved for use by students and not short term/tourist accommodation as this is having a negative impact on the Hotel Sector.

Strict Enforcement of Air BnBs should also be undertaken to free up over 300 units across the city.

A schedule of street cleaning should be published.

3.8 The CBA are grateful for the opportunity for this submission to be considered by Cork City Council and welcome further engagement in relation to same.