



# Cork Chamber

RSES Submission

11 October 2019

## Introduction

Cork Chamber has made an extensive submission to the initial draft of the RSES which is attached as an appendix to this second submission.

As a Chamber of Commerce representing 1,200 businesses and 100,000 working people in Cork, we actively support the detail and intent of Ireland 2040.

Setting forth a spatial and economic plan, that is bound to a capital plan, legislated for and overseen by a group made up of the Secretaries General of each Government Department is a move that differentiates Ireland internationally. The structure is unique, and the intent is visionary and bold.

But as ever, only delivery can prove the intent and the RSES has a key role to play in the delivery of Ireland 2040.

The main points set out in the original Chamber RSES submission are as follows and remain relevant to the final consideration of the RSES:

- The central position of City Regions as economic drivers in Ireland 2040 must be carried through to the adopted RSES.
- RSES Decision Making and Implementation Process – ensuring Ireland 2040 is implemented and not eroded over time and that the RSES supports this and does not undermine
- Implement and Monitor Ireland 2040 - Reinforcement of the alignment of Ireland 2040 and the national Development Plan and Cork's unique position with it.
- Compact growth and high density - Creating of thriving, sustainable cultural and economic hubs while also taking account of viability
- International Connectivity – The critical nature of international connectivity for our open economy
- Public Transport - Importance of public and sustainable transport in facilitating stable economic growth, meeting environmental targets, and in reducing unsustainable transport
- Jobs of the future - Building an economy and infrastructure that can adapt to the jobs of the future. In this respect, we emphasise the importance of digital infrastructure, clusters and co-working supports to enable our rural areas to prosper.
- Counter cyclical investment: Importance of continued infrastructural investment irrespective of economic cycle.
- Energy, Climate Change Mitigation and the Circular Economy Importance of state investment in large scale renewable deployment, and community-based initiatives.
- Alignment of all public policies with the vision of Ireland 2040 and the stated strategic priorities of a RSES.

In response to the current draft we make a number of precise observations related to the changes that have been clearly identified by the Assembly team.

## Governance and Decision Making

We take the opportunity to once again highlight the process of decision making and the composition of the Assembly. City regions as areas of dense population are underrepresented and this distorts the democratic nature of the process. We have set this out in our initial submission.

If the integrity of Ireland 2040 is damaged by the content of the RSES then it serves to undermine planning policy, increase the likelihood of sprawl, incentivise laissez faire planning and create an unsustainable economic and social legacy for generations to come.

### Key Point:

1. We seek a review of the decision-making process and the composition of the Assembly. Currently, City regions are underrepresented creating a distortion in the decision-making process. Urban areas are distinct in their opportunities and challenges, as are rural areas, and it is critical that a representative decision-making model and Assembly aligns with population densities and acknowledges these distinctions.

## Sustainable Development Patterns

The increased emphasis on sustainability throughout the document is hugely welcome. Spatial and economic planning plays a significant role in the creation of movement and investment patterns and their associated energy, carbon, environmental and social impacts. It is essential that at every juncture the RSES supports compact dense development that is supported by high quality sustainable, and public transport corridors and services.

The development of all spatial plans and infrastructural investment over the lifetime of the RSES will take place under increasing environmental scrutiny and it is essential that the RSES robustly supports best practice models. We recommend that compatibility with the UN Sustainable Development Goals is considered in the finalisation of the RSES.

### Key Point:

1. We welcome the increased focus on sustainability and urge the compatibility and alignment with the UN Sustainable Development Goals to support enhanced overall regional policy alignment and strengthened participation in the achievement of the goals across social, environmental and economic development.

#### Material Amendment 4: p.7

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

While we support the proposed amendment regarding collaboration between metropolitan areas in the Southern Region (and Galway) to harness a strong counter-balance to Dublin as well as the need for investment in the region’s metropolitan areas, we note that this amendment places primary emphasis on delivery of the M24, representing a clear deviation to the National Development Plan and Project Ireland 2040, and a wholly unacceptable contradiction of national strategy. To include and to emphasise a non NPF project of this scale in the RSES represents a significant undermining of strategic planning and sets a dangerous precedent for the totality of the plan and for all subsequent planning policy documents including the RSES itself.

The National Development Plan commits to delivery of the M20 Cork-Limerick motorway and allocates funding for same. Already, €15m has been released for the M20 project design contract, and a delivery office has been established to progress this strategic road project. On the contrary, the National Development Plan bears no commitment to delivery of an M24 motorway. Neither the N24 or the M24 are referenced at any point in the Ireland 2040 National Planning Framework.

The emphasis of Material Amendment 4 is clear contraction to the wording, strategic emphasis and direction of the National Development Plan and Project Ireland 2040. It is the strong view of Cork Chamber that the primary emphasis within the RSES should be delivery of the M20 to link Cork, Limerick and Galway with motorway connection and thus enable a strong regional counterbalance to Dublin as stated within the National Planning Framework and Project Ireland 2040, the national planning guidance documents to regional strategic economic strategy development.

**Key Point:**

- 1 Material Amendment 4 places primary emphasis the delivery of the M24 is a wholly unacceptable contradiction and deviation from the intent and ambition of the National Development Plan and Project Ireland 2040. To include and to emphasise a non NPF project of this scale in the RSES represents a significant undermining of strategic planning and sets a dangerous precedent for the totality of the plan and for all subsequent planning policy documents including the RSES itself.
- 2 It is the strong view of Cork Chamber that the primary emphasis within the RSES should be delivery of the M20 to link Cork, Limerick and Galway with motorway connection and thus enable a strong regional counterbalance to Dublin stated within the National Planning Framework and Project Ireland 2040, the national planning guidance documents to regional strategic economic strategy development.

### [Material Amendment 23 + 24, page 21](#)

Under the proposed material amendment 23 (New RPO C: Inter-Urban Networks as Regional Drivers of Collaboration and Growth), we note that the M20 Cork-Limerick network is not included. This is a major omission in the document which must be corrected.

Under the proposed material amendment 24, we note again that the M24 is elevated which is inconsistent with the National Planning Framework. In addition, when referencing the Atlantic Economic Corridor, we would welcome a definition of this corridor that explicitly includes Cork. The Atlantic Corridor includes the three city regions of Galway – Limerick and Cork.

We ask that the final RSES includes a definition of same.

Key Point:

1. We request the correction within Material Amendment 23 to include the M20 Cork – Limerick route within RPO C: Inter-Urban Networks as Regional Drivers of Collaboration and Growth.
2. We request the removal of the M24 which is inconsistent with and challenges the integrity of the National Planning Framework with regard to the M20 Cork-Limerick route.
3. We request the inclusion of a clear definition of the Atlantic Economic Corridor.

Material Amendment 31, page 25

As above, we would welcome a definition of the Atlantic Economic Corridor, including M20 Cork Limerick corridor is rightly included within this.

Key Point:

1. We request definition of the Atlantic Economic Corridor and the inclusion of this within the final RSES.

Material Amendment 59, page. 36

*“To support the role of our strategic road and sustainable transport networks including connectivity to the TEN-T Core and Comprehensive Network, connecting the region’s metropolitan areas, key towns, ports and airports with the Atlantic Economic Corridor, extended Dublin-Belfast Eastern Corridor and other urban networks as identified through Section 3.8 of the RSES and City and County Development Plans.”*

We suggest that the above amendment is changed to include support for refuelling infrastructure for electric/ and CNG along these routes. While the need for electric and clean fuelling infrastructure is mentioned later in the document, it would be appropriate to include here too.

Key Point:

1. We suggest that Material Amendment 59 support for refuelling infrastructure for electric/ and CNG along these routes.

Material Amendment 60, page p.37

As part of the Regional Freight Strategy, we propose that the RSES supports the need to explore high speed rail and electrification.

Key Point:

1. The final RSES represents an opportunity to further emphasise national policy to explore alternative transport fuels and technologies. Cork Chamber suggests Material Amendment 60 support the exploration of high-speed rail and electrification.

Material Amendment 65, p.39

We note the proposed amendments for the RSES to “Support for continued exchequer assistance support for smaller regional airports under the Regional Airports Programme” and “Support strategic route development for airports outside of Dublin (such as Public Service Obligations)”

We highlight that the future of the Regional Airport Programme is currently under consideration by the Department of Transport, Tourism and Sport and that it has Government’s intention to end PSO routes to Kerry and Donegal. For the RSES to express support for continued Public Service Obligation on air routes thus appears to be contrary to State Policy.

The National Aviation Policy commits to ‘phase out operational expenditure over a maximum of 10 years’. What is facilitated by the Regional Airports Programme and what the Government want to

happen in the future seems to be at odds with one another. It is the view of Cork Chamber that the Southern Region (and Ireland overall) needs a reasonable geographic spread of well-run, well-connected and profitable airports of scale instead of multiple different airports competing on overlapping routes with no sustainability or long-term viability due to being taxpayer subsidised.

In addition, we note that EU guidelines stipulate that capital support and up to 50% aid intensity can be provided to airports serving between one million and three million annual passengers. Cork and Shannon Airports both fall within these parameters, yet do not benefit from the Regional Airports Programme.

Overall, it is probable that it is particularly inappropriate for the RSES to take a position on the commercial operation of Airports other than to facilitate proper spatial planning and infrastructural enabling and we strongly question the inclusion of this narrative in the RSES.

**Key Point:**

1. We highlight that the future of the Regional Airport Programme is currently under consideration by the Department of Transport, Tourism and Sport and that is has Government's intention to end PSO routes to Kerry and Donegal. For the RSES to express support for continued Public Service Obligation on air routes thus appears to be contrary to State Policy.
2. We question the appropriateness for the RSES to take a position on the commercial operation of Airports other than to facilitate proper spatial planning and infrastructural enabling and we strongly question the inclusion of this narrative in the RSES.

**Material Amendment 67, p.41**

We welcome the proposed amendments under Local Planning Objectives. Further to supporting the permeability of walking, cycling and public transport in new and future developments, we recommend that the RSES supports existing major employment areas, especially those with Transport Strategies such as Little Island, to be prioritised for funding to enable sustainable and public transport modes.

**Key Point:**

1. We recommend the RSES support existing major employment areas, prioritising those with approved Transport Strategies, as is the case of Little Island for funding to enable sustainable and public transport commuting.



Material Amendment 109, pp. 66-68

We welcome the inclusion of the Lee to Sea Greenway as a cycling infrastructure project worthy of investment.

Furthermore, the inclusion of support for the 'Integration of All Sustainable Travel Modes' is positive and should be carried forward into the adopted plan.

Under the rail network, we propose that improved frequencies on all Cork Commuter Rail Services to increase rail usage are included as a strategic priority, which is in accordance with CMATS.

In addition, we suggest that Mallow is recognised as a Commuter Rail Station serving North Cork. We note that no new infrastructure will be needed for this to happen and that the only change required is a revised fare structure. In fact, the inclusion of Mallow within the Cork commuter zone is a quick win to immediately enhance the appeal of rail for commuters travelling between Mallow/ North Cork and Cork City.

Key Point:

1. We welcome the emphasis on sustainable travel modes and integration of all modes. Cork Chamber highlights the quick win associated with designating Mallow as a Commuter Rail Station and the opportunity this presents to encouraging a modal shift for commuters in North Cork.

Material Amendment 110, pp.68-70

We welcome and support the proposed amendments to Cork MASP Policy Objective 9: Strategic Road Network Improvements.

Material Amendment 113, pp. 71-72

The proposed amendment for the Port of Cork recognising the need for "improved strategic road access to the Port of Cork Ringaskiddy, Cobh, Marino Point and Whitegate is supported as a critical component for unlocking the full potential of the Port of Cork and to enable regeneration of the Cork Docklands" is welcome.

Key Point:

1. We welcome the support for the enhanced access to the Port of Cork facilities in recognition of the strategic importance of the Port of Cork to the entire southern region and nationally, and the regeneration of the Cork Docklands.

Material Amendment 117, p. 75

We welcome the elevation of Cork Events Centre as a cultural and economic important asset for the Southern Region.

**Key Point:**

1. The Cork Events Centre is a regionally significant project and a strategic priority in driving and developing tourism and cultural assets.

Material Amendment 112, pp. 79-80

While we support the development of Limerick as a strong economic hub in the Southern Region, we have serious concerns about the proposed amendment to change the wording under heading a) to read as follows:

- a) Support the regeneration and continued investment into Limerick City through initiatives such as Limerick 2030 and Limerick Regeneration and to further enhance Limerick City as the key primary economic driver for the Southern Region.

As set out in Project Ireland 2040, it is the intention of the State to develop Cork into a strong second city of European scale. The associated population and jobs growth targets for Cork will result in Cork becoming the fastest growing city in Ireland over the next twenty years, in other words the primary economic driver in the Southern Region.

**Key Point:**

1. We object to proposed material amendment number 112 on the basis that the revised wording is inconsistent with Project Ireland 2040 and the actual current and projected scale of the Southern Regions Cities and would elevate Limerick City above Cork and other cities within the Southern Region as being the key economic driver.



## Conclusion

In conclusion, our submission is precise and our observations are fair. We ask that they are treated with the utmost seriousness and look forward to reviewing the final document.

We wish to thank the executive team of the Regional Assembly for their tireless work on behalf of the region.