



Cork Chamber Submission

to the

Cork County Development Plan Initial Public Consultation

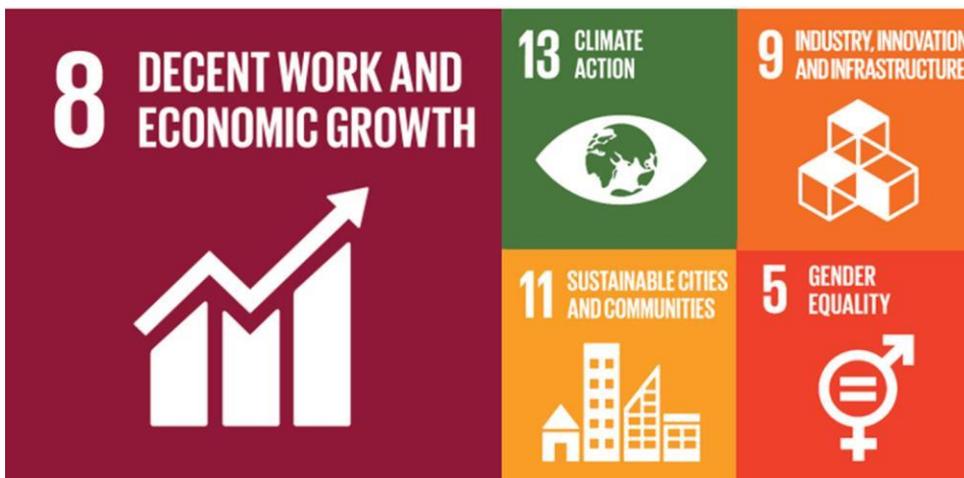
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Introduction

Cork Chamber represents 1,200 members employing over 100,000 people and is the largest business representative body in the Southern Region. Our vision is for Cork to be the best place for business and to do this our mission is to empower a thriving and influential membership.

Cork Chamber welcomes the opportunity to make a submission on the Cork Country Development Plan. This submission is focused on positioning Cork as an area of exemplary economic resilience, by mobilising our towns, villages, and metropolitan area to differentiate itself internationally through the lens of the UN Sustainable Development Goals. The Metropolitan Cork area is the most productive and efficient economy of scale in the Southern Region and as such is well positioned to deliver significant value and growth to the national economy. As an added nuance, our submission also references and is influenced by the current pandemic where appropriate throughout. While we recognise that strategic planning is about setting a long term vision, the current pandemic has certainly heightening the senses around critical areas, such as mobility and safety and it is likely that this sentiment and legacy will remain to a greater or lesser degree throughout the lifetime of the plan.

As with the whole of our work, this submission has been guided by our commitment to the UN Sustainable Development Goals. Five specific goals have been identified by the Chambers Ireland network which we actively advocate for throughout our daily workflow:



The future for Cork as envisioned by the National Planning Framework (NPF) and supported by the Regional, Spatial and Economy Strategy (RSES) is key to the ambitions of the Southern Region and the country as a whole. As a metropolitan area, Cork has a larger population than the other major cities in the region combined and is predicted to grow in population significantly over the next 30 years. Cork's advantages such as its harbour and coastline, global economic clusters, international connectivity (port, airport and digital infrastructure), road infrastructure, health infrastructure, water infrastructure, energy infrastructure, population base, world leading higher education institutions, skills, culture and quality of life provide a strong platform to achieve the goals as outlined in the NPF. While acknowledging that Cork has all the necessary credentials, to provide a solid foundation for the anticipated growth of the City and County area, the provision of adequate fully serviced development land capacity within the metropolitan area and the key identified centres of this future growth in the County including regional towns and a clear strategy to accommodate forecasted growth is critical to the achievement of this national ambition.

Through continued investment aided by a strong development plan, there is an opportunity to ensure that Cork not only meets its targets but continues to outperform other city regions. Infrastructure provision and progressive placemaking will be critical in realising this goal. Cork Chamber supports enhanced inter and intra-regional connectivity with investments such as the M20, M28, N22 and Dunkettle Interchange critical to this. In the metropolitan area there is a tremendous opportunity to enhance sustainable transport patterns by delivering on the Cork Metropolitan Area Transport (CMATS). This can be supported further through balanced investment in the broader metropolitan area ensuring the goal of reducing sprawl by utilising existing brownfield sites and by promoting placemaking and sustainable communities. The recent Covid-19 restrictions have demonstrated the importance of the public realm in planning and ensuring that people can continue to social distance whilst returning to pre-coronavirus economic activity. Creating a holistic and connected approach to placemaking and transport will be key to meeting sustainability and environmental targets. Cork has a large role to play in the climate resilience of the country with its natural energy resources and large renewable energy production capacity. We note that the objectives of the RSES is to support and seek to strengthen these assets which should be noted in the local development plan.

Settlements, Placemaking and Housing Delivery

The housing crisis is demanding significant growth in the delivery of housing and this must be provided in a way that meets the needs of a growing population but also achieves the goals of the NPF of sustainability, placemaking and reducing urban sprawl. The Urban and Rural regeneration fund set up under *The National Development Plan 2018-2027* provides €1 billion towards rural projects and €2 billion for urban projects. Construction will be key to the economy and encouraging the construction of housing will play a major part in this. The availability of living accommodation above businesses can form a key part of ensuring people have affordable properties to rent or purchase and can remain in their own towns. Over the course of the development plan, community focus will be essential to ensure that social housing, affordable housing and private housing is seamlessly integrated and harmonious.

A further challenge is that many of the most promising settlements in the County, that have been identified as locations for growth, have a substantial infrastructural deficit, which means that these areas are not fully prepared for accelerated development. It is possible that some growth areas could fall into the Tier 2 category of areas identified for growth under the NPF and possibly be de-zoned if infrastructure cannot be delivered in a prescribed time. The challenge is how can these identified growth areas be targeted, prioritised and funded for fast-tracked provision of infrastructure services.

Infrastructure service providers are independent silo-based agencies and semi state service providers with a national remit, centralized budget control and very significant and disparate funding demands. Their list of investment priorities and service delivery programs may be very different to those of the Cork region. The coordinated and timely delivery of such services has significant impacts on the development consent process which can result in developments being refused on the basis of being premature, due to these services deficits. Therefore, a coordinated approach to funding and delivering each of the required services on a targeted “growth areas” wide basis needs to be addressed. There needs to be close liaison, and concerted agreement, between the Council and these agencies Irish Water (IW), Transport Infrastructure Ireland (TII), the NTA, Bus

Eireann, Iarnród Éireann, ESB, Gas, National Broadband, LDA, IDA and EI to ensure that these areas are not just planned growth areas but areas where growth is delivered on.

The current infrastructure situation is potentially a barrier to progress and the delivery of facilities such as wastewater treatment can be very difficult to deliver because of planning and environmental constraints. The timeframe for the design and delivery of such facilities as providing or upgrading a wastewater treatment plant can extend upwards of five years.

While we note that it is not within the gift of a spatial plan to address this challenge it is clear that better funding, wider discretionary spend, proactive infrastructural investment decisions and structured dialogue must be agreed upon if the aims of the plan are to be fully realised. A forum for agreeing priorities among infrastructural and local stakeholders could be a useful mechanism and the functioning of the Dunkettle Interchange Traffic Management Forum is a microcosm of how this can be very effective.

As we transition from Covid-19 it will be more necessary to adhere to social distancing measures to ensure the economy restarts in a meaningful way whilst meeting the requirements of restricting the spread of the virus. This can be achieved by reimagining and reengineering our existing public spaces and creating an environment where not only are our towns reinvigorated but we meet the needs of people in their locality. The recent lockdown and movement restrictions show the importance of planning the public realm in a way that meets the needs of citizens to live and work in their locality. Creating spaces which promote cycling and walking in a safe way have significant benefits not only for individuals in reducing obesity and other health related issues but also the economy. People who utilise these forms of transport spend significantly more in towns and cities than their car bound counterparts. They require less space to store their bikes and the infrastructure required can be installed quickly and cheaply. Leveraging existing and planned greenways to extend the safe passageway for cyclists and walkers will make Cork towns more enticing to visitors and encourage active and sustainable tourism.

Town Centres and Urban Capacity

Our towns are hugely important in the fabric of Cork life and ensuring their success will require bold short-term action and long term thinking in the face of the current crisis.

Beyond a finite list of notably successful towns the dilapidation of streetscapes in many rural towns is an ongoing challenge. Many town centres were already struggling prior to the pandemic but their situation is now even more perilous. There have been numerous closures and the number of businesses set to reopen remains and unknown, creating further challenges for town centres. The improvement of these areas must be key objective particularly to support consolidated development around town centres making these areas attractive locations to live in or visit.

Getting people safely into our towns and making it possible to adhere to social distancing requirements is achievable within the existing space but this space needs to be redefined. Amending the public realm to accommodate cycling and walking will help return vibrancy to our towns, it will encourage spending and attract tourism. Section 5 of the National Planning Framework 2040 relates to rural areas. It shows the national importance of our towns and objectives 6 and 7 seek to strengthen and diversify rural towns to be a focus for local housing and employment growth, based on regeneration and development that will include derelict site transformation and new technology, such as low carbon and energy efficiency and digital connectivity. Additionally, the investment planned through the improvements to the public realm are considered important in creating a sense of place. Under national policy 18a there is support for designing towns in a way that will contribute to their regeneration and renewal which include public realm interventions. The Cork Cycle Network Plan and CMATS already provide a roadmap to the cycleways in development and planned for the future of Cork. We now have an opportunity to bring these projects forward and stand amongst the great regions of the world who are also taking this opportunity to meet the challenges of the 21st century and begin planning for them now.

Town centres will play a vital role in the County's economic recovery when Covid-19 restrictions begin to ease. They are the key to the Council's increased focus on placemaking, creating sustainable density and making a greener environment for citizens by reducing absolute dependency on the car transport. The proposed Retail centre in East Cork will provide a massive challenge to achieving

these goals as it will encourage people away from our city and towns and into their cars. At a time when people need to be encouraged into our towns, a retail unit drawing them away will have a detrimental effect to recovery and would appear to be the antithesis of the aims of the RSES and the NPF.

An effective joint retail strategy is essential for Cork. We would encourage the council to look at alternatives such as enhancements to our existing towns through its recently announced funding programmes and those available nationally that would make them more liveable and encourage visitors.

The Chamber is ready as ever to work with the County Council to ensure Government provides appropriate levels of support for the Council, property owners and businesses to contribute to the improvement of the public realm and streetscapes of local towns and village particularly in those areas of the County identified for growth.

Transport and Mobility

One of the principal objectives of the Chamber is to put in place the essential infrastructure to achieve a step-change in the use of public transport, to secure a transition to a low-carbon economy and to ensure that our transport infrastructure continues to unlock the economic potential of Cork. The Cork transport network must transform over the next number of years through the application of CMATS including the planned upgrades to the Dunkettle Interchange and the planned works on the Ringaskiddy N28 and Cork to Limerick M20. The Cork north ring road is also part of the overall M20 project. Although these projects are overdue and necessary from a transport and logistical perspective it is evident that the car cannot be the predominant method of transport for the people of Cork and we need to look to other solutions.

CMATS includes significant bus and rail infrastructure and this will further enhance the attractiveness of towns positioned to benefit. Walking and cycling reduce the amount of vehicular traffic on the road and also provide benefits to both the individual and society. To encourage more people to consider this, there is a need to provide a safe infrastructure within which people can commute to work either through walking or cycling solely or as part of a mixed use of the public

transport network. CMATS makes provision for improvements to this infrastructure which we believe could be implemented more quickly in a low-cost way through temporary barriers similar to those introduced in Dublin on the quays. Additionally, the connection of existing planned greenways can help create viable and safe cycling and walking links between urban and rural locations. Improving these pathways to cater for both cyclists and walkers will encourage more users.

To be clear, cycling and walking is not a sole panacea for traffic congestion, but the benefits outweigh the costs and can relieve pressure on our public transport, while creating a more enjoyable environment for us all. For far too long, Cork has essentially been a one trick pony when it comes to transport. Investment is timely, considering the requirement for continued social distancing and the restrictions on space within buses and trains. Advances in technology mean that the bike can be motorised with electric pedal assistance and therefore it is appealing to people to commute and arrive in work fresh and not need additional infrastructure in their places of work. The Council can use this opportunity to rebrand the bike as a tool not only for fitness and leisure pursuits but as a viable part of their transport mix.

Cork is not disadvantaged in comparison with other areas in Europe where this mode of transport is far more ubiquitous and just requires the leadership of the council to be successful here. It is the council's view that these projects mentioned above and the CMATS provisions applicable to the County be included in the CDP. The importance of transport infrastructure to the growth plans of the County indicate that it would be highly beneficial for the NTA to have a Cork office focussed on delivery in complement to the work of the Council.

Reduction in traffic could be achieved through more flexible working times and companies in locations such as Little Island can continue to stagger shift times to help reduce the stress on the existing network, but while measures such as this provide alleviation they are not enough on their own. The Little Island transportation study must be fully rolled out or there is a risk of damaging the potential for future investment in the area.

Finally, we would encourage the County to plan for reduced speed limits in towns and villages to 30kph. This is the safest way to ensure all users of the road and path networks can be

accommodated in the existing infrastructure. It enhances safety, reduces noise and pollution, and helps our urban areas to be pleasant locations for trade and amenity alike. Continued focus on traffic calming measures, such as islands, rumbles strips, speed tables, radar speed signs and other comparable forms of infrastructure the point of entry to all towns and villages should be considered to encourage motorists to adjust to a more considerate speed. This is another area in which Cork County can be a leader.

Waterways form an integral part of transport infrastructure in cities around the world and Cork has the advantage of being home to the second largest natural harbour in the world. By virtue of the fact that many of the county's key commuter hubs and employment areas are located in the harbour area, it would be remiss of this development plan to not afford due consideration to a study of water-based transport options. CMATS states that *“waterborne transport may perform a role for facilitating certain movements and support of the Strategy. It is envisaged that these will come forward and be delivered on a commercial basis.”* The plan should commit undertaking a thorough investigation into the viability of water-based transport solutions as a means of easing traffic congestion and reducing reliance on cars in areas such as Ringaskiddy.

Economy and Employment

The predicted population growth in Cork will be driven by an influx of talented people encouraged by all that our natural, social and economic environment has to offer. Economic resilience is key and building on existing strengths requires us to look to embedded sectors with the same enthusiasm and facilitative environment that created our economy in the first place. We cannot be complacent about what we already have, nor about what we may achieve with strategic planning.

Cork has built an international reputation and track record as a location for attracting and sustaining large scale indigenous and foreign direct investment in advanced manufacturing sectors such as biopharmaceutical, medical technologies, ICT, and food technology. These manufacturing sectors remain a cornerstone of the Cork regional economy providing high quality jobs and sustaining a large network of supporting businesses.

A major factor in Cork's success in attracting manufacturing FDI has been the availability of high-quality serviced lands in strategic city environ locations, in particular, Ringaskiddy, Little Island and Carrigtwohill. However, the success of these locations has inevitably led to a reduction in the number of viable greenfield sites now available for new investment. Challenges in terms of access (e.g. Little Island, Ringaskiddy and Carrigtwohill, Ballyadam) and the availability of key utilities to support new, large industry are also coming under pressure. Increased competition from other regions (e.g. Limerick, Galway, Waterford) seeking to attract manufacturing FDI in the high-tech manufacturing sectors has also intensified over the past decade.

As part of the development plan, it is suggested that a strategic review be undertaken of how the plan can specifically support the future growth of the manufacturing sectors and in particular the established clusters of life science, ICT and food technology in the greater Cork region. A review of the quantum, status and suitability of greenfield lands available for short, medium and long term industrial development should inform a road map for re-establishing Cork as the location of choice for high tech manufacturing.

Cork Chamber has been involved in the Ratio project which is funded by the Interreg Europe programme and the European Regional Development Fund (ERDF). The project identified potential policy change(s) to promote and enable rural-based SMEs to reach their potential. A report completed by the Chamber noted that the main challenges for rural based SME's are workforce retention, access to a skilled workforce, physical infrastructure of broadband and transport, access to finance, rural transport, access to markets and difficulty in sourcing innovation partners. The CDP has the capacity through its remit to address these challenges in a holistic way in conjunction with bodies such as the Cork Chamber other Ratio stakeholders.

Cork also benefits from integration of industries and specialist incubation centres such the Rubicon in Bishopstown and the Ludgate Hub in Skibbereen. The success of Ludgate could be replicated in other towns and supported by the Rural development funds and the rollout of the National Broadband Plan. While not every town can have the equivalent of a Ludgate, comparable facilities of varying scale can certainly be created in multiple locations. The continued development of Cork County Council's Digital Strategy in parallel with the National Broadband Plan will help leverage our

connectivity infrastructure to continue to attract ICT investment. The CDP should also incorporate the high likelihood that remote working may increase after the Covid-19 lockdown measures are removed.

In addition, the green economy will help to make Cork's economy more resilient in the future and supporting green initiatives now will make Cork an attractive destination for potential talent. To this end, through the process of creating the CDP, the Council should closely monitor the evolution of the EU Green Deal which will yield significant funding opportunities for those best positioned and aligned to EU goals.

Tourism

Tourism is a critical sector to Cork and in addition to the existing unique selling points such as the Ireland's Ancient East corridor, Wild Atlantic Way Corridor and Ireland's Maritime Paradise, there is an opportunity through the advancement of the greenways and blueways to encourage to the large market for active and sustainable holidays to add further market diversification to our tourism offer. Why not create a greenway linking Cobh to Midleton and onwards to Cork? Or link the Youghal Greenway onwards to Dungarvan? There are huge opportunities for the taking over the lifetime of this Development Plan. Additionally, an underutilised resource for the purposes of tourism is the natural harbour in Cork. Cork should look to replicate the success of the wild Atlantic way with a dedicated cycle and walking path of the harbour taking in the amazing beaches, inlets, woodlands and towns.

Key tourist towns such as Kinsale would benefit from enhanced pedestrianisation in the small streets. Removing vehicular traffic from the small back streets would increase footfall and create opportunities for outdoor dining, make streets safer for pedestrians and cyclists. Where it is not possible to ultimately prioritise pedestrianisation, every effort must be made to slow and calm traffic movement to ensure it is as passive and non-disruptive as possible.

Environment and Climate Change

The recent extreme weather events have highlighted the impact of greenhouse gas emissions (GHG) on our country and we must expedite adaptation and mitigation measures for communities to cope with the reality of these becoming more frequent in the future. There is an evident desire amongst the people of Cork to deal with these issues as recent climate marches have shown and now is an opportunity to promote more climate friendly and sustainable modes of living. In the Anthropocene age we must acknowledge that we are more likely to now require adaptation rather than mitigation measures to counteract the harmful effects of climate change to our country. Limiting warming global temperatures to within 1.5 degrees requires a decrease of CO2 emissions to fall by approximately 45% from 2010 levels by 2030. We recently lent our support to the Cork County Climate Adaptation Strategy 2019 - 2024 and continue to support this work but mitigation can still be a priority within the CDP.

Cork accounts for 13% of Ireland's wind energy generation. Cork is also a hub for marine renewables (tidal and wave rider tech), and solar PV. Solar PV has the potential to generate a very significant portion of Ireland's target for renewable electricity. We acknowledge and welcome the solar farms approved to date by the council and this should be highlighted in the plan. Cork has a unique strength in energy production for the country and with renewable energy we can be a leader in the country in the provision of renewables through wind and solar. However, although the appetite for wind and solar is well proven by the volume of planning applications in the county, the development plan must also cater to the wide range of technologies that may become viable over the coming year. We note hydrogen, anaerobic digestion, waste to energy, gas injection facilities, and our ever-critical gas and electrical transmission systems as areas that should be progressively supported in the plan. Finally, as the interplay between terrestrial and marine planning policies continues to evolve, the CDP should also look favourably on the development of offshore windfarms off the coast of Cork, and the provision for transmission assets that may be required onshore.

Green spaces and planting of trees should be prioritised given the proven benefits of both in the reduction of GHG emissions and the health benefits. Another area of mitigation is sustainable transport methods such as cycling and walking in addition to public transport which we have dealt with throughout this document. This is an area of mitigation where the CPD can have a strong

impact on the category of emissions that is second only to agriculture emissions in Ireland. Transport emissions are the number two contributor to Ireland's overall GHG emissions, and we need to continue our efforts to transition our public vehicles to more sustainable sources of fuel such as electricity and hydrogen when it becomes more widely available. Our county's geography poses a challenge as many are dependent on the car but there is still a large part of the country within the metropolitan area that is commutable by bike or electric bike. Encouraging this method of transport via dedicated cycleways will benefit the air quality of our towns and reduce our GHG emissions. Additionally, planning for this type of infrastructure is a key element of placemaking and making Cork a more attractive proposition for those planning to visit or to move to Cork.

The All-Ireland pollinator plan and the value of indigenous planting must be emphasised in this plan which will be a cornerstone not just for spatial planning but for the detail that is added to specific planning applications thereafter.

Energy

Renewable energies (RE) present a critical piece in the puzzle in further reducing GHG emissions, mitigating climate change and ensuring sustainable development in Cork. The country is not on target to meet the EU 2020 GHG emissions nor its renewable energy targets, making the second lowest progress out of the EU-28 in this regard. According to the Central Statistics Office, agriculture accounts for the highest share of emissions in Ireland, accumulating to 33% of overall emissions, followed by transport at 20% and electricity generation at 19%. (SEAI, 2020). Supporting a diverse mix of renewable energy technologies is crucial to decarbonizing these sectors, clearly recognized in the Renewable Electricity Support Scheme (RESS).

To achieve 2030 and 2050 targets significant infrastructure improvements and changes are required, such as EirGrid's preparations for a Single Electricity Market which will accelerate renewable electricity growth. Additional infrastructure improvements are required as Gas Networks Ireland seeks to deliver 37% biomethane through the gas network by 2050. Renewable gas injection points and Bio-CNG refueling stations are vital to this deliverance. The deliverance of RE along with the necessary infrastructure requirements is a critical component of Cork's business community's competitive advantage globally.

The role of cooperatives offers opportunities in the RE sphere to overcome development and generation barriers offering numerous support mechanisms and influencing local attitudes and culture. Agricultural cooperatives that engage in RE and RE cooperatives introduce the necessary element of citizen and community involvement in the sustainable energy transition, deemed a key design component of the RESS. They further play an important role in rural development and placemaking. Their role in the RE market must be activated to achieve future targets and eventually carbon neutrality. As referenced above in the climate section, every effort must be made in the drafting of the plan to ensure it is facilitative of large-scale investment in renewable energy production.

The plan should encourage energy efficiency in areas of transport and in new development in towns and villages. It should also support research and innovation in supporting energy security in more rural villages and towns.

In terms of planning for waste treatment requirements to 2040, the National Planning Framework's National Strategic Outcome 9 – Sustainable Management of Water and other Environmental Resources, expressly provides that this will require Waste to Energy (WtE) facilities which treat the residual waste that cannot be recycled in a sustainable way delivering benefits such as electricity and heat production.

In light of a growing population and the associated greater volumes of waste, an identified policy need for further progress towards self-sufficiency due to the continued dependency on the waste export market and more ambitious waste legislative targets contained in the Circular Economy Package, there is now a vital need for additional strategic waste treatment capacity in the Southern Region as underlined in the National Planning Framework and which is necessary if the region is to grow and expand in an environmentally sound and circular manner.



Maritime Cork

The Port of Cork is the key seaport in the South of Ireland and is one of the only two Irish ports which service the requirements of all six shipping modes i.e. lift on, lift off, roll on, roll off, liquid bulk, dry bulk, break bulk and cruise. The ongoing Port of Cork Redevelopment Project in the Lower Harbour will form an extension to the existing facilities that the Port currently operates in Ringaskiddy. It is enabling the Port to facilitate larger vessels and ensuring long term international competitiveness. The Port of Cork Ringaskiddy Redevelopment Project (new Container Terminal) is already proving its worth as a strategic investment with new transatlantic shipping route recently established. In the context of the current pandemic and the shifting sands of Brexit, the Port's ongoing investment in the €80 million Cork Container Terminal in Ringaskiddy is already proving visionary and purposeful.

The port is ideally positioned for further investment with the development of a new container terminal it will overcome the existing physical constraints in handling larger vessels and increasing the ability of the port to adapt activities to match current international requirements. Among other things, the port redevelopment will enhance the ability of Cork to maximise the potential for increased sea freight direct to mainland Europe post Brexit. It will catalyse and influence wider regional development, including the development of the tourism sector, the Cork Docklands at Tivoli and Marino Point. In doing so it will grow Cork's recreational and housing capacity.

In complement the M28 is a strategic national primary route serving the EU TEN-T core transport network of which the Port of Cork is part. The criticality of this route to the continued resilience and growth potential of the life sciences cluster cannot be overstated. The M28 is a critical component for unlocking the full potential of the Port of Cork, industry and IDA strategic land holdings, and must be firmly recognised as a critical piece of national infrastructure to be completed within the lifetime of this development plan.

The Cork area is also home to the Irish Maritime and Energy Research Cluster (IMERC) in Ringaskiddy, which is a branded partnership between University College Cork (UCC), Cork Institute of Technology (CIT) and the Irish Naval Service (INS). The partnership focuses on the co-located assets, services and supports of the National Maritime College of Ireland (NMCI, CIT), the Beaufort building



housing the SFI Centre for Marine and Renewable Energy (MaREI, UCC) and the Irish Naval Service base at Haulbowline. The IMERC partnership focuses on education, research, innovation and clean technology, and supports the potential co-location of over 40 companies at this clustering location.

The vision of the IMERC partners is to promote Ireland as a world-renowned research and development location that unlocks Ireland's maritime and energy potential. IMERC was established by the partners in 2010 with the focus on addressing global research and commercial opportunities in the maritime and marine energy sectors.

In short, the lower harbour has unique existing assets, both natural and economic drivers that can be further unlocked over the lifetime of this plan.

Conclusion

There is a considerable opportunity for this development plan to pave the way for greater social, economic and community resilience for Cork. Our submission is grounded in countless surveys, conversations, meetings formal and informal inputs, the strategic direction of our Partners, our Board, our Public Affairs Council, and our SPC representatives. We thank Cork County Council for the opportunity to contribute and look forward to engaging further as the Plan continues to develop. We urge that every opportunity to be dynamic, responsible, inspiring and responsible is taken in the development of the next draft.