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**RE: Urban Development and Building Heights Consultation**

Dear Minister Murphy

Cork Chamber welcomes this opportunity to give feedback on the draft Urban Development and Building Heights Guidelines for Planning Authorities.

As you know, Metropolitan Cork is primed for significant change under the National Planning Framework: The population of Metropolitan Cork will almost double to over 500,000 people while Cork City will become the fastest growing city in Ireland.

At the same time, the National Development Plan commits €200m towards BusConnects, which will substantially improve the reliability and attractiveness of public transport usage across Cork City and suburbs.

In this context, we agree fully with the sentiment expressed in your foreword: *"Our cities and our towns must grow upwards, not just outwards, if we are to meet the many challenges ahead. [...] Furthermore, there are serious and unsustainable carbon emission implications due to increased commuting distances to the city and town centres, never mind the sheer waste of time in travelling, when instead we could be living."*

Already in Cork, we have seen strong and renewed appetite by industry to be in the city centre, enabled by the construction of new offices in our Docklands and in Cork's historic city core. For our cities to become more sustainable and to improve work-life balance it would be preferable that housing developments take place close to new workplaces. At present, we have a particular need for more urban apartments that will help attract and retain talent to underpin the growth of our national economy. Existing examples such as the Elysian development, which is now fully occupied, illustrate a strong market demand for high-rise and high quality urban residential schemes. We believe our planning guidelines should support the development of more mixed-use apartment schemes of this type.

Consequently, Cork Chamber supports your proposed change to planning guidelines to enable more urban developments to build up and not out. Density is the goal and height is a one of the levers that can make this change. By increasing housing density in our city centres, our cities will become more alive, which in turn will support more city centre businesses, and the development of much improved urban public transport networks as is critically needed. We also note that the future potential development of light rail across Cork will require increased population density levels.

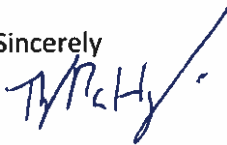
However, while we strongly agree with encouraging more density in urban centres, it is important that new planning guidelines do not present a barrier to suburban developments. There is a delicate balance to be struck in the delivery of much needed housing and the aspiration to create vibrant urban areas. Over the past 18 months, Cork has seen a welcome upturn in suburban construction which meets much needed market demand. With the exemption of student housing and apartment schemes, the strongest demand for suburban housing remains traditional low-density housing consisting of two, three and four bed semis.

In addition, we feel that in cases where a developer and a planning authority agree to a height or design of a property, flexibility in planning guidelines should facilitate delivery to market.

Finally, we acknowledge that increased urban height often is met with a view that such builds will negatively change the character of existing local areas. Consequently, we believe that new planning guidelines should give increased importance to quality of design and respect for public place. Perspective is subjective and the guidelines should support proactive community and stakeholder engagement to create opportunities for consensus and understanding where possible within the planning system. To meet this objective, we propose that additional resources are provided for Local Authorities in urban areas to oversee urban planning applications.

I trust the above observations will be considered carefully as part of the consultation and look forward to seeing the final planning guidelines to enable increased urban densities.

Yours Sincerely



**Thomas Mc Hugh**

**Director of Public Affairs**