

Department of Housing,  
Local Government and Heritage,  
Custom House,  
Dublin,  
D01 W6X0.

28<sup>th</sup> March 2025

To whom it concerns,

Cork Chamber welcomes the opportunity to contribute to the public consultation on the Department of Housing, Local Government and Heritage's Statement of Strategy 2025 - 2027.

Cork Chamber represents 1,200 members together employing 130,000 people throughout the city, metropolitan area and county. Our vision is to lead a transforming and ambitious Cork City and County, and our purpose is to unite, represent and support our members and community. Our direction is guided by our formal pledge to uphold the United Nations Sustainable Development Goals. Cork Chamber has also been designated an SDG Champion by the Department of the Environment, Climate and Communications for 2024 – 2025.

Cork Chamber's advocacy efforts are guided by the views and priorities of our partners, and are shaped by our continuous engagement with members, our Board and key stakeholders in Cork City and County. The work of the Department of Housing, Local Government and Heritage encompasses a number of key priority areas for Cork Chamber and its members.

Housing delivery has consistently emerged as a top priority, particularly with regard to housing supply in the Cork metropolitan area. Cork is the fastest-growing city region in Ireland, and it is vital that housing delivery keeps pace with this demographic growth.

Cork Chamber also benefits from frequent and constructive engagement with both Cork City Council and Cork County Council, collaborating on a wide range of projects, forums and other initiatives to progress our shared objectives for the future of Cork City and County.

Sustainability is a key priority for Cork Chamber and its members, and we particularly welcome the Department's current mission to pursue its strategic goals in a sustainable manner.

Yours sincerely,



Conor Healy

CEO

## **Feedback on the Department of Housing, Local Government and Heritage Statement of Strategy 2025 – 2027:**

### **Introduction**

Cork Chamber welcomes the opportunity to provide feedback to help shape the Department of Housing, Local Government and Heritage's Statement of Strategy for the period 2025 – 2027. Housing remains a key priority for Cork Chamber's members and the Department's current mission to support the sustainable and efficient delivery of well-planned homes and effective local government is welcome. Indeed, Cork Chamber benefits from regular and constructive engagement with both local authorities in the region, Cork City Council and Cork County Council. We very much support the Department's commitment to support and enable democratic, responsive and effective local government.

### **Housing Delivery**

Housing supply remains a pressing concern for Cork Chamber and our members. With Cork's population projected to grow considerably in the coming decades, urgent action is needed to mitigate existing shortfalls and keep pace with growing demand in the city and county. The Housing Commission has estimated that, as of the 2022 census, there was a housing deficit of between 212,500 and 256,000 homes in Ireland, and accordingly a deficit of between 24,000 and 29,000 homes in Cork in line with Cork's population.<sup>1</sup>

A number of positive policy initiatives in recent years have boosted housing delivery in Cork. Continuing the pursuit of policies that will attract investment in housing and secure supply for the future, like Croí Cónaithe and Project Tosaigh, must be prioritised to ensure that housing delivery is accelerated further.

Supporting housing development in a sustainable, future-proof way must be a key focus for the coming years. In particular, we must seek to revitalise our urban centres, many of which have undergone significant changes in recent years. Innovative housing solutions can play an important role in enhancing our urban centres. Converting vacant and derelict units and examining the possibility of above-shop housing units must be a key focus for local authorities and should be supported by enabling policies and funding from central government. Access to existing grants and funding opportunities to convert such properties should be simplified where possible and advertised widely to encourage greater uptake. Creating safe, welcoming and thriving public realm spaces and city centre communities, centred around sustainable housing and supporting infrastructure should be a key focus in the coming years.

The Department should also take account of current issues with viability, particularly regarding the development of apartments. Expanding on current incentives should be

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<sup>1</sup> [Report of The Housing Commission](#)

considered to ensure the viability of private development to complement successful affordable housing schemes currently in place.

Cork Chamber's pre-Budget 2025 submission proposed a number of measures that could be considered to stimulate the housing market, namely:

- Raising cost-rental limits, including considering the introduction of indexation to account for inflation.
- The introduction of capital allowances in the short term to increase the viability of apartment development. A reduction in the rate of VAT on residential construction activity to 5% for the period to 2030, as well as tax depreciation of 4% per annum for apartment developments and an exploration of accelerated capital allowances over seven years for Build to Rent (BTR) and Private Rental Sector (PRS) could be considered in this regard.<sup>2</sup>

The Croí Cónaithe Vacant Homes Refurbishment Grant provides a real opportunity to bring more vacant and derelict properties into the current housing stock. However, it would be beneficial to extend the timeframe in which works must be completed to avail of the grant, as well as paying out the grant in stages rather than retrospectively. This measure would allow for greater uptake of the scheme and consequently the renovation of more vacant and derelict properties.<sup>3</sup>

Under the current Statement of Strategy, the Department recognises the need to “ensure that appropriate policies are developed and a strategic framework put in place to meet the accommodation needs of older people.” As a member of the Age Friendly Alliance in Cork, Cork Chamber welcomes this ambition. In this regard, greater support should be provided for the expansion of rightsizing housing schemes, enabling older people to transition to more suitable accommodation while freeing up larger homes for families in Cork. Cork City Council's initiatives in this area serve as a strong example of the positive impact such schemes can have.<sup>4</sup>

## **Planning Reform**

At present, the primary limiting factors affecting the pace of delivery of housing occur before construction even begins on site, with delays linked to planning and infrastructure servicing having a considerable impact. The non-alignment of delivery plans for residential sites with the necessary infrastructure has been consistently highlighted by stakeholders as a restricting factor to development. Ensuring greater alignment between the providers of necessary infrastructure, such as electricity, water and wastewater, local authorities, other state and

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<sup>2</sup> Cork Chamber, [Budget Submission 2025](#)

<sup>3</sup> Irish Independent, [Sligo/Leitrim TD Marian Harkin welcomes staged payments for Croí Cónaithe Vacant Homes Refurbishment grants](#)

<sup>4</sup> Cork City Council, [Cork City Council wins two awards for social housing initiatives](#)

semi-state bodies, and developers must be prioritised insofar as possible to facilitate the timely delivery of much-needed housing units and other major developments.

It is crucial that all stakeholders align their development plans and delivery plans to the new National Planning Framework (NPF), set to be agreed by Government imminently, to ensure the required infrastructure is in place on zoned land that is ready to be developed into residential housing.

In Cork Chamber's submission to the public consultation on the first draft revision of the National Planning Framework in September 2024, we emphasised the importance of recognising Cork and the wider Southern Region as an important counterbalance to the Greater Dublin Area.<sup>5</sup>

It is vital that the revised National Planning Framework sets out an ambitious roadmap for balanced, sustainable regional development in our towns and cities. The upcoming review of the National Development Plan (NDP) must ensure that the potential for growth in the Southern Region is realised and supported by enabling infrastructure and funding.

It follows that local development plans should then be carefully aligned to both the NPF and NDP to expedite much-needed housing and industrial development. In turn, providers of critical infrastructure, such as Uisce Éireann and ESB Networks, and developers must align their planning processes to these plans.

Aligning projected developments with plans for enhancing grid infrastructure will be particularly important, with current grid capacity in the Cork region already under strain. Coordination with Government Departments and state agencies responsible for scaling up Ireland's renewable energy delivery in line with 2030 climate targets will be critical in this regard, ensuring that sufficient grid infrastructure is in place to facilitate new residential and commercial developments and to ensure that grid connection is not a barrier to the timely delivery of projects.

The Department's current strategy sets out a welcome ambition to ensure that planning and building in our regions, communities and maritime area contributes to the delivery of sustainable and balanced development. The new Statement of Strategy should seek to build on this commitment, ensuring that developments in the planning sector, such as the revised National Planning Framework and new National Development Plan, as well as the Planning and Development Act 2024, are implemented in a sustainable manner, prioritising the reuse and repurposing of existing infrastructure where possible, and respecting existing communities.

Planning authorities should be fully resourced in order to effectively implement the new Planning and Development Act and establish An Coimisiún Pleanála. Sufficient resources must be invested from local level upwards to mitigate delays in the planning process and provide

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<sup>5</sup> Cork Chamber, [NPF Submission](#)

greater certainty for developers and all other stakeholders. The introduction of a triage system in the planning process to ensure projects of strategic importance are prioritised for delivery without delay should be considered in this regard.

Although housing delivery remains a key priority, delays in the planning system continue to be a key limiting factor affecting the pace of delivery across other projects of strategic importance, including infrastructure and energy projects, many of which are also crucial to support economic growth, particularly in a rapidly expanding city region like Cork.

In addition, the Land Development Agency has a key role to play in supporting the housing market in the current climate, and recent announcements regarding agreements to deliver homes as part of the Cork Docklands regeneration are welcome. However, these initiatives must be balanced with sufficient support and opportunities for private development to create a more viable housing market in which international investment is encouraged.

### **Local Government**

Given the current Statement of Strategy's goals around the sustainable management of water resources and the provision of effective and efficient water services, it is worth noting ongoing difficulties with the provision of water services in Cork City, as well as other locations across County Cork.

The work required to modernise water supply infrastructure in Cork City is considerable, however it is vital that progress is made in improving the quality and security of water supply in the city to ensure that the network is equipped to facilitate the city region's growing population. Ensuring security of supply and the rapid connection of new homes to the network is crucial to deliver the ambitious housing targets set out by the Government, and this should be a key priority for the coming years.

Sustainability has been identified by Cork Chamber's members as a key priority for progress and should be at the core of all future development and planning for Cork and other regions at both local and national level. With Cork designated an EU mission city for climate neutrality to 2030, sufficient supports and resources must be provided at a local authority level to support businesses in their climate neutrality journeys.

Cork Chamber is proud to play a role in supporting this mission, helping to progress large-scale decarbonisation projects in Cork alongside Cork City Council. Cork Chamber has also partnered with Cork City Council to support the Local Green Deals (LGDs) initiative, supporting businesses to sign up to tailored action plans to accelerate the city's green transition. Cork was recently recognised for its leadership in securing LGDs at the EU Intelligent Cities Challenges in Brussels, where the city received an award for most LGDs signed in the Intelligent Cities Challenge Programme with consistently high quality.<sup>6</sup>

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<sup>6</sup> Cork City Council, [Cork City wins European Award for its Local Green Deals](#)

Ongoing support at local authority level is crucial to progress Cork city's ambitions in the area of climate neutrality in the coming years, and it is vital that sustainability is embedded into all aspects of planning for Cork's future development.

Similarly, with the effects of climate change and severe weather becoming more apparent, it is crucial that we protect our built and natural environment to mitigate against the impact of such severe weather events. The delivery of much-needed flood relief schemes for Cork City and towns across County Cork must be prioritised in this regard, providing certainty to businesses and residents alike.

In addition, it is critical that Met Éireann is supported in its role to enable it to deliver accurate and timely weather warnings and advisory services where necessary. The Department's current Statement of Strategy sets out a welcome ambition to further enhance Met Éireann's role as the authoritative voice on meteorology and climatology in Ireland, which should continue to be prioritised by the Department. Against the backdrop of increasingly frequent extreme weather events, reliable warnings for businesses to mitigate against the potential economic impact where possible must be prioritised, including potential localised warning systems where necessary. This is particularly relevant in a large county like Cork, where local weather conditions can vary greatly from one area to another.

In addition, Cork Chamber welcomes current ambitions to foster independent, democratic, responsive, innovative and effective local government. The new Statement of Strategy should seek to develop this further, ensuring effective local government at all levels with regard to service management and project delivery across all sectors.

In Cork, both Cork City Council and Cork County Council carry out a wide range of critical functions every day and should be supported in their remit with sufficient resources. Cork City Council has undertaken a wide-ranging restructuring of its directorates in recent times, including the introduction of a new directorate for city centre operations and development, which will play a key role in supporting the revitalisation of Cork city centre, ensuring that Cork maintains and enhances its reputation as a safe, welcoming and thriving urban centre.

Cork City Council must be sufficiently resourced and supported as the Cork city region continues to grow. The provision of sufficient resources will ensure that Cork City Council is equipped to deliver its ambitious and transformative plans for the coming decades, particularly in the context of large-scale urban regeneration projects such as the Cork Docklands. The city is entering a period of immense change and expansion, and must be equipped to manage this evolution in a sustainable manner if Cork is to realise its potential as a meaningful counterbalance to Dublin, both in economic and demographic terms.

## Heritage

Cork Chamber supports the Department's current aims to conserve, protect, manage and present our built, natural and archaeological heritage, and our biodiversity in order to support local communities, regional economic development and sustainable employment.

In Cork and in other regions across the state, conserving local heritage and biodiversity plays a central role in defining the unique selling points of each region. This in turn helps to set our regions apart on the global playing field, defining our competitive edge and attracting both investment and talent. The connection between maintaining and creating vibrant, welcoming local communities and fostering economic growth and development is clear, and the Department should continue to pursue policies of sustainable development that respect local heritage and biodiversity in all aspects of its future planning.

In particular, the new Statement of Strategy should prioritise increasing investment in the Department's Historic Structures Fund to better support the repair and maintenance of key heritage sites, including the Shandon Bells and St Finbarre's Cathedral, both of which require restoration work. The allocation of funding for St Anne's Church and the Shandon Bells is welcome in this regard, and continued funding to support ongoing maintenance should be prioritised.<sup>7</sup> These landmarks are integral to Cork City's historic character and contribute significantly to its tourism economy.

At Cork Chamber, our direction is guided by our formal pledge to uphold the UN SDGs, five of which have been identified as priority areas by the Chambers Ireland network. As a 2024 - 2025 SDG Champion, we are committed to supporting the implementation of sustainable practices across all sectors and areas of activity, and we welcome the Department's current aim to accelerate the realisation of SDGs through the use of data and digital technologies.

Current and anticipated legislative measures at both national and EU level will have a significant impact on the volume of reporting carried out by many businesses with regard to sustainability practices. For example, the European Commission has recently proposed to amend the Audit Directive, Accounting Directive, Corporate Sustainability Reporting Directive and the Corporate Sustainability Due Diligence Directive to create a new Omnibus package.<sup>8</sup> Such legislative requirements will result in the collection of a considerable amount of additional data, and deploying new and innovative technologies to analyse such data sets could assist with measuring progress towards the implementation of SDGs and other targets, for example.

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<sup>7</sup> Irish Examiner, [Cork's iconic Shandon Bells to receive €250,000 for restoration](#)

<sup>8</sup> European Commission, [Commission simplifies rules on sustainability and EU investments, delivering over €6 billion in administrative relief](#)

## **Conclusion**

Cork Chamber looks forward to the publication of the Department of Housing, Local Government and Heritage's new Statement of Strategy for the period 2025 to 2027. Ambitious and innovative strategies will be crucial in the coming years to ensure the delivery of much-needed housing units across the country, as well as the realisation of key projects at local government level. With a new National Planning Framework, National Development Plan and the Planning and Development Act all in train, there is a key opportunity at present to integrate sustainable, forward-looking development into all aspects of future planning across the country and this should be prioritised.