

## OBSERVATIONS RE CHAPTER 2

While it is great to see redevelopment of the Docklands, more focus is also needed on brownfield sites and derelict/vacant sites in the city centre - we need to keep quality "greenfield" areas as natural spaces for the wellbeing of all in our community. It is also important to keep the green belt in both hinterland and city suburbs along with the green to blue infrastructure to maintain our richness in biodiversity, ecology and wildlife if we are to have any hope of also meeting the SO4 - Climate & Environment and SO5 Green and Blue Infrastructure, Open Space and Biodiversity objectives. It is vital that these two objectives are interwoven and enshrined in all other objectives, otherwise there will not be a future to plan for. Proper monitoring of the actions and objectives for housing developments (taking SO4 and SO5 into account) is critical, e.g. that the environmental impacts on proposed developments are not just monitored but net positive.

There is mention of a Cork City Neighbourhood Profile - how is it created and by whom? Local communities need to be involved in this - after all they know their neighbourhoods best.

**Objectives 2.18, 2.19, 2.20:** It is important that these objectives are achieved in such a way that reduces the impact on green spaces. What is the definition of "underutilisation"? Who decides this? The developer may feel an area is underutilised, but the community may totally disagree. A woodland or green area which has either or both biodiversity and recreational importance is not "underutilised" as has been suggested in recent planning applications. The Derelict Sites Register needs to include not just derelict sites, but derelict and abandoned buildings with a right for compulsory purchase. What is the point of a fantastic new sustainable development surrounded by several abandoned and decrepit buildings?

**Objectives 2.14, 2.12, 2.26:** It is really important that every multiple housing development considers access to local amenities - business, retail, schools, cultural AND NATURAL. And that that consideration relates to what is currently existing or approved not what the developer would like to suggest will happen to get their development approved. New access to public natural areas must not be assumed in planning applications, but be real and approved, both by the Council and the local community. Too many applications assume that if they provide access to a public natural area, there is no problem if they destroy the bulk of it during construction. Such natural areas must not be negatively impacted by the creation of new access as part of the planning application. This is both for the wellbeing of the community and the natural area itself. It is also important to ensure that access to shops and schools is realistic - not just that they are local but also that they are safe for people to access by foot or cycling. A recent planning application focused on how close the local schools were without showing how children were going to cross a busy road with no footpath outside the proposed development. All new developments must be mixed, to ensure that residents can remain local throughout their lives if they so wish AND also be affordable.

Retrofitting of cycle and pedestrian infrastructure is critical (in theory - it must be well planned and considered), but also no multiple home development should be permitted without appropriate and safe cycle and pedestrian access and infrastructure.

**Objective 2.23:** The whole area of housing and development needs a much stronger environmental statement that ensures quality of life for all. The impact of green spaces and nature on health and mental wellbeing is well documented. This needs to be recognised and integrated, not just in this objective, but across all objectives.

**Objective 2.24:** Monitoring and evaluation needs to be much more detailed and stringent- it is noted in a later section that the whole plan cannot be monitoring - why not? It must be, otherwise what is the point - the Council is accountable to the people and cannot be accountable if they do not monitor and evaluate!! Clear targets must be set which must be measurable and constantly

monitored. They also must be independently audited on an annual basis and a public report produced with clarifications as to why any targets and objectives have not been met and what remedial actions the Council has or will take. Such audit and report must be undertaken and published in a timely manner. Residential Density does need to be increased, but also needs to include similar rules regarding public green space as well as pedestrian and cycle infrastructure. For example, if there must be 35 dwelling per hectare, then there must be a matching minimum of public green space and pedestrian and cycle infrastructure.

**Objective 2.28** re the supply of zoned land is contradictory to many other objectives. Zoning of land needs to be restricted. As the rest of the objectives indicate as a minimum, this objective, if met as drafted, will mean many of the other objectives cannot be met - it is too vague and open-ended and thus open to abuse.

### OBSERVATIONS RE CHAPTER 3

**Figure 3.2** on page 73 totally underestimates the environment segment which focusses only on sewage, water, waste and power, while totally ignoring green & blue infrastructure, natural aspects of biodiversity (as well as climate change mitigations & adaptations), which are part and parcel of many other if not all segments, including health, social, justice and networks. Missing this from a key diagram suggests a lack of either commitment or joined up thinking vis a vis other sections of the plan.

**Section 3.24:** Why does this only refer to greenfield sites - it should refer to brownfield sites, regeneration sites, etc.

**Sections 3.33:** Private housing solutions for one-person households “will be varied” the plan says, but does not mentioned one bed houses as an option - this is particularly relevant for the elderly. If one-bed houses with a small private garden or green area were to be included in each and every development with an elderly person’s existing community (particularly with appropriate support services), many elderly people would be much happier to move from their 3-bed family home, thus releasing housing stock for families, etc. Moving elderly people to blocks of apartments would be soul destroying but moving to a community housing development would have the opposite effect. This is mentioned in 3.46 and 3.47, but is very vague.

**Sections 3.76 to 3.81** on health totally miss the importance of mental health and also how suitable housing within a community environment with natural green spaces and pedestrian and cycle infrastructure is critical to this. This is also missed out in **Sections 3.82 to 3.85** on recreation and amenity. Recreation and amenity is about much more than formal parks and sport fields. It is about access to green & blue infrastructure - natural spaces for walking, cycling, enjoying, learning about and protecting nature and biodiversity, using our waterways, etc.

**Section 3.96** regarding a safe and secure city needs to include how crime will be policed - you can’t just “design it out” of existing or new communities. Making one area safe often just move the issue to another. A classic example of this is the police station in Douglas which was developed at considerable expense to the taxpayer who sees little benefit as it is rarely open to the public and there is little evidence of police on the beat. So unsociable behaviour (particularly by young people) moves from Mahon and Togher to Douglas at night as they know there is no local Gardaí presence.

**Objective 3.1:** What will the Cork City Neighbourhood Strategy be? This should not be undertaken “during the lifetime of the plan” but developed as a matter of urgent, so that it is incorporated into the delivery of the plan from the outset. Assumedly this relates in some way to the

Neighbourhood profiles mentioned also. This needs to be development through consultation with those neighbourhoods.

## OBSERVATIONS RE CHAPTER 4

### Table 4.3 regarding greenways:

- This makes no mention of a Tramore River/Valley Greenway way, much of which already exists which would like the City east to west, as well as with possible side connection to the Lee to Sea and Passage Railway Greenways. This is an appalling omission, given (1) the amount that exists already and thus development thereof would be a quick “win”, (2) the commuting and creation facilities it would offer and (3) the development of greenways that are all connected - providing both network corridors for residents and for biodiversity.
- The Ballybrack Valley Pedestrian & Cycle Track should be referred to as a greenway, because it is just that - so much more than a “track”. Any cycle link to Carrigaline should include a pedestrian link (as should all such “cycle links”). This greenway should also link back down after Maryborough Hill and the Carrigaline Road to the Passage Railway Greenway.
- The above two observations if enacted would create (1) commuting and creation facilities and (2) greenways that are all connected - providing both network corridors for residents and for biodiversity.

There is a real gap in consideration of similar connections on the north side of the city, which other than Glanmire/Riverstown seems to have been ignored.

Sections 4.56 to 4.64 seem to totally ignore the north side of the city and the south-central city suburbs (Douglas/Grange/Frankfield/Togher/Ballyphehane, etc.) Why? In Section 10.309, the plan says that the Council will work with stakeholders in supporting the delivery of sustainable transport proposals - what proposals? There are no sustainable options in 10.311 and for example, with the proposed expansion in Castletreasure, traffic congestion in Douglas will only get worse. A more comprehensive multi-modal (whatever this means!) Southern Distributor Road is not a “sustainable” option, particularly given car use in Douglas is already exceeding the city-wide average of 62.6% as the plan states.

## GENERAL OBSERVATION RE CHAPTERS 5 AND 6

The objectives of both these chapters must be entwined and integrated into all other objectives as detailed in the plan, otherwise the Climate Action & the Environment (Chapter 5) and Green & Blue Infrastructure, Open Space and Biodiversity (Chapter 6) objectives will be totally unachievable.

## OBSERVATIONS RE CHAPTER 6

### Table 6.4:

- This table ignores waterways other than the Lee itself - what about the Tramore River, the Curraheen River, etc.? What about the Douglas River which is a Special Area of Conservation (which is noted in Figure 6.4 as an opportunity, but with no plan, which is ridiculous given the possibilities).
- City Centre Neighbourhood Parks must be more than a playground, sports field, basketball court, outside gym and paths between mown grass. Support must be given to projects such as

pollinator areas, wildflower areas, composting, hedgerow management, zero or minimal use of pesticides, etc. These could be developed with the local community groups (such as community associations, tidy towns groups, etc. who really know and care for their community) so long as the appropriate support - financial and expertise - is given. Such communities will then not only learn new skills, but take real ownership for their development, management and maintenance while providing fantastic natural spaces for all to enjoy. Too many projects are created (or areas regenerated) but have no plan or funds for ongoing maintenance and management - planting as part of the Douglas Flood Relief scheme is a prime example.

- I also question the Council's understanding of their assets, perhaps this is particularly in areas recently transferred into the Council's remit from the County Council. I am aware of Douglas in particular, but this gap is probably arising on other areas. For example in Douglas,, there is no mention of Ballybrack Woods (the Mangala) or Doman's Wood either in Table 6.3 or in Table 6.9. There is also no mention of Beaumont Quarry. Such omissions such a lack of community involvement in the development of this list - this goes back to the need for the Neighbourhood Strategy and Profile activities to be undertaken NOW!

**Section 6.38** which seeks to ensure Public Rights of Way are preserved. A list of existing public rights of way should be prepared and marked on a plan and made available via the Council website. Working with local community groups would also help ensure these rights of way are not just preserved, but preserved (in conjunction with the landowner).

**Table 6.12** has considerable omissions for other City suburbs parks, such as community parks, etc. and needs to be reviewed and updated.

**Section 6.74** acknowledges that Alien Invasive Species are a major issue, but offers no real action. While this may be included in the City's Biodiversity Plan, this is not sufficient. It is critical that control of existing and further spread of these species is a mandatory consideration in all building developments. Thus **Objective 6.26** needs to be updated from "To support the implementation of measures to control and prevent..." to "To implement measures..."

**Objective 6.22:**

- It is noted that "Cork City Council will seek to establish and use a City Biodiversity database". This is not good enough, this needs to be amended to the Council "will establish" ...which "must" be considered in all land management decision making.
- Also add : work with communities as part of the Profile & Strategy Plan activities to create and support Neighbourhood Biodiversity Plans which will become appendices to the City Plan.

**Objective 6.25:** It is noted that "Cork City Council will seek to map the City's ecological networks and corridors of local biodiversity value outside of designated areas. Again this is not good enough, this needs to be amended to "Cork City Council will work with local community and environmental groups to map..."

## **OBSERVATIONS RE CHAPTER 9**

**Section 9.11 re Flood risk.** The whole strategy for flood risk mitigation and prevention needs to be totally reviewed and consideration given to other options, for example the harbour barrage option rather than construction of City walls which will destroy our city (which is totally contradictory to the objectives of this plan) and which all experts (other than the City's and the OPW's) agree will not be a long term solution. A barrage could also include a truck only roadway taking traffic from Ringaskiddy to the Dublin and Waterford roads as well as an element of energy production. I have not developed on this theme, as there are no doubt, others far more knowledgeable than I, making relevant submissions.

## OBSERVATIONS RE CHAPTER 10

**Section 10.313** mentions the Douglas Land use & Transportation Study (DLUTS) which, given it was published in 2013, now has little meaning and relevance. 8 years later the key recommendations have not been implemented nor the plan adhered to. At best it has been given lip service in an planning reviews. It “analyses traffic congestion in Douglas” pre 2-13 and is thus so out of date, before you even consider the proposed Castletreasure expansion plan. Is the City really relying on and 8-10 year old study for plans to develop this City Development Plan?!!! This and any other old plans need to be serious reviewed and updated, before making recommendations in the City Development Plan.

### **Section 10.319:**

- Any development proposals in this area (and for all similar areas across the City) need to be supported by a comprehensive transport assessment and travel plan (in accordance with the proposed sustainable transport objectives). Furthermore, there is no mention of protecting biodiversity, the river, natural open spaces, etc., all of which is contrary to the overall objectives. I reiterate that unless the objectives of Climate Action & the Environment (Chapter 5) and Green & Blue Infrastructure, Open Space and Biodiversity (Chapter 6) are entwined and integrated into all other objectives as detailed in the plan, the overall plan’s objectives will be totally unachievable.
- Any developments in the Barry’s Field area must respect the DLUTS (as it currently exists) and local building heritage (as recognised by An Bord Pleanála in their rejection of the various planning applications by Lidl for this site).
- If the “plans” for Douglas are anything to go by, then the City is totally out of touch with our suburbs and needs and wishes of the people who live there.