



An Taisce

THE NATIONAL TRUST FOR IRELAND

An Taisce Corcaigh

PO Box 26, Togher, Cork

Telephone:

E-mail: antaiscecorcaigh@antaisce.org

Cork City Development Plan 2022 – 2028

Submission by An Taisce Corcaigh

An Taisce Corcaigh thanks Cork City Council for the opportunity to make a submission on the draft City Development Plan 2022-2028.

An Taisce Corcaigh welcomes the Strategic Objectives in the draft Development Plan 2022-2028 including those aimed at achieving transport, climate and environmental, GBI, open space, and biodiversity policies. Many of these objectives are shared and actively advocated for by An Taisce. In addition, from an urban planning perspective, we strongly support the objectives of compact livable growth, heritage arts and culture, and environmental infrastructure.

While noting the significantly wider remit of the City Council within the enlarged council area, including its suburban towns and neighbourhood areas, this submission is confined to comments in regard to the future planning and development of the city centre and inner suburban/docklands areas, which tend to be the main focus of An Taisce Corcaigh's regular submissions on planning matters. The Council will be aware of our key ongoing concerns on a range of planning issues which are set out in greater detail in our responses to individual planning applications. These include the need to actively advance the rejuvenation of the city centre and inner suburbs, and the inner docklands areas, in a manner which respects and is complementary to the existing built environment and its significant built heritage and cityscape. This environment is a significant economic, tourist and cultural asset, apart from its primary purpose as the retail and business core of the city, with its surrounding residential communities. The relatively low-lying city centre is also a characteristic of Cork which should be a key factor in assessing the rejuvenation of the city centre area.

We therefore strongly support the policies in the draft plan which recognize the need to take these assets into account, including the reaffirmation of architectural conservation areas and the built specific built heritage objectives. We also support the stated objective of achieving authenticity in the development of the city centre and docklands. This should encompass developments of appropriate scale and design, in line with the existing height guidelines for the inner river channels in particular.

We note that the CORK CITY Urban Density, Building Height and Tall Building Study, was published on 21st September 2021, providing a detailed assessment of the criteria which might

underpin increased densification and, in certain areas, taller buildings. The Study provides a comprehensive assessment of a balanced approach to increased densification with gradually increasing heights within the prevailing local contexts, including certain suburban areas, with reference to tall buildings only on the basis of meeting certain criteria. As will be clear from this study, significant challenges arise to achieve increased density in the inner city and docklands areas. The implications of this study require a considered public debate which has not taken place in Cork.

The achievement to increase heights within the existing urban area is a logical response to the need to provide for projected economic and population growth. This process has been slow to commence in Cork (existing residential examples are at Batchelor's Quay, Pope's Quay and South Terrace), and the potential in this regard is significant, particularly in the inner suburban and inner dockland areas identified in the study.

An Taisce Corcaigh would support gradual increase in heights within the existing urban area, to create sufficient density for future expansion of the city's population, in line with national planning objectives. This process would also have to have regard for the existing built environment, which itself is in need of significant rejuvenation within the older parts of the city centre. The latter has a largely vernacular character which presents particular challenges in designing suitable infill developments, of appropriate scale.

The proposal for Tall Buildings are of more significant concern, given the wider area indicated in the draft Development Plan as a potential zone for tall buildings – see Figure 10.4. Previous assessment of locations for tall buildings in Cork established a core principle that tall buildings would be avoided on the city centre island and river corridors. This principle has not been adhered to in recent grants of planning at the eastern end of the city centre island and adjoining quayside area. The use of the most recent Study (Sept 2021) as a basis to now greatly widen the area for potential tall building in these inner harbour and city centre areas is very concerning in the absence of any proper analysis of the impact of this scale of development on the wider cityscape.

An Taisce Corcaigh have been consistent in our view that tall buildings should not be placed on the city centre island or inner dockland areas, in line with the existing City Development Plan 2015-22 (CCDP). We continue to support the option of tall buildings in downriver areas such as the outer North and South Docks. We do not feel that excessively tall buildings are required for rejuvenation of the city centre area, particularly as such structures are completely in conflict with the many other policies in the draft Plan, referred to above.

Specifically, we note that the CORK CITY Urban Density, Building Height and Tall Building Study notes that Cork City Centre is an historic environment with a sensitive, high quality and special townscape, where buildings which are considerably taller than those around them can therefore have a significantly adverse impact on townscape character. In particular, the Study notes the impact of tall buildings on ACAs, protected buildings and structures, views and prospects, and residential neighbourhoods with a very consistent prevailing height. The Study

also notes that the city centre island area is the most sensitive location in regard to the assessment of tall buildings. This is principally because of the concentration of protected buildings and the identified protected views which crisscross the city. The surrounding suburban areas are also sensitive, principally because of the low level but consistent prevailing heights of its neighbourhoods compounded by the rising topography both north and south (the foregoing paragraph is cited but not specifically referenced, as noted in the CORK CITY Urban Density, Building Height and Tall Building Study (September 2021)).

We are of the view that significant assessment of the implications of the CORK CITY Urban Density, Building Height and Tall Building Study (Sept 2021) is required in advance of the adoption of an extended zone for tall buildings in the draft Development Plan. The Cork City Study (Sept 2021) will provide a significant input into this process. The low rise city is a major positive asset in itself, as evidenced by many other cities of similar scale and ambition across Europe, where taller buildings are placed at an appropriate distance from the historic centre.

Trusting you will take our views into account

An Taisce Corcaigh
10th September 2021