



4<sup>th</sup> October 2021

## **Response to the Draft City Development Plan**

### **Introduction**

Cork Environmental Forum broadly welcomes the iteration of this Draft Plan which appears to have taken on board many of the inputs from consultees last August.

We especially welcome the adoption of policy frameworks contained in other guidance strategies such as the Regional Spatial and Economic Strategy of **compact growth and the 15-minute city**. The strategic vision by and large underpins all the right ambitions and inclusion of the Sustainable Development Goals gives the correct messaging.

Initiatives in strengthening the Plan such as the Green & Blue Infrastructure Study, efforts to make the documents accessible through presentation and user-friendly tools and engagement of young people and their reflections dispersed throughout the Plan are all positive additions.

### **Transformational Challenge**

Whilst the world changed during Covid, and Cork adapted in an agile and responsive fashion, the 2022 -2028 period is the most important period to see consistent and increasing action to limit emissions and conserve, protect and restore nature.

The scale of what is required by this newly expanded City in such a short time scale is difficult to comprehend not to mind plan for. The need to accommodate a growing population and deliver for all residents better quality of life, health and wellbeing in an urban setting whilst giving nature equal primacy is a big step change. We acknowledge the responsibility on the local authority in executing its planning function in a manner that meets these diverse and complex requirements is a challenge.

### **Core Strategy**

The adoption of compact growth in the City and larger urban areas and development in line with a 15-minute city are commendable. Targets show a limited amount of available land in the city centre with much of the planned development in areas more distant from the core of the city which is not conducive to compact growth, emission reduction targets and indeed a lower land use footprint on nature.

- We would like to see a stronger replication of the standards as set out for the Tivoli Docklands for the urban realm vision and detail reflected throughout the Plan. This development is somewhat in the future whilst we need to be setting these standards now.
- We do not think that the level Tier 1,2, & 3 lands identified in Table 2.3 truly reflects the level of derelict sites and underutilized land in the City Centre.
- We would like to see more of a commitment to valuing, protecting and restoring our natural assets and the historic, archaeological and cultural assets of the City. In executing planning permissions does the process really comply with the protections of this deeply felt shared

inheritance, the Built Heritage is very well covered in Volume 3, but is there resourcing to always be able to proof ever application properly against the objectives of the Biodiversity and Heritage Strategy. The City does not still have adequate resourcing for nature, and this gap needs to be highlighted in the Plan.

We are mainly commenting on Chapters 5, 6 and 9 with brief references under other parts of the Plan.

### **Chapter 3 Delivering Homes & Communities**

- The City needs to step in at a much earlier stage before, often times important historic and protected properties, are reduced to complete dereliction which costs a lot more to bring back into use. The only people who then can afford this are larger investment companies, often with no connection to the city and no feeling for it, Cork will continue to lose the “heart” of the City as long as this is allowed to continue.
- A higher vacant site tax to discourage this neglect.
- Consistent policies and initiatives from the City to give certainty to people to invest.
- Opportunities for infill development not fully articulated in the Plan.
- Traveller Housing Strategy does not appear to be included on maps.
- Planning for residential should favour individuals and smaller developments that are more sustainable from every perspective including employment, financially and socially.

### Chapter 4

Transport – CEF as a member of the Transport and Mobility Forum supports and endorses this very comprehensive submission. As transport accounts for 40% of emissions the change to active and public transport are key to the transformation required as well as adhering to a compact growth and 15-minute city model. The contribution changes in how we travel in the city will lead to the significant GHG reduction targets and have a positive contribution to make to the aims under the next chapter.

### **Chapter 5 Climate & Environment**

We welcome the ambitions and aims in this chapter, including under Objective 5.2 to “where possible surpass ..... a 51% reduction in carbon emissions by 2030”.

#### Objective 5.11.

**Inclusion – we would like this objective to specifically name natural systems to also help with Energy Efficiency, it may be understood to be contained in design but requires a more explicit reference.**

#### Objective 5.16

**Amendment – “~~To encourage~~ **require** development proposals ..... “**

#### Objective 5.21

**Amendment “All future applications for the development of schemes of 50 or more homes or 1,000 sqm of floorspace at ~~the following strategic~~ **all locations** will be required.....”**

We would like to see inclusion of

- The Doughnut Economy, not just the Circular Economy aspirations. The city needs to support a more all embracing transformation that includes sustainable finance and other key aspects of the economy.
- Identify the skill sets and set out a roadmap for jobs for green enterprise, circular economy etc.

## Chapter 6 Green & Blue Infrastructure

We fully support the need to update the Cork City Landscape Strategy (2008).

**Remove – we do not agree with reinstatement of the Ballincollig Weir as weirs are an obstacle to the ecology of the river.**

The single most important thing that the City can do which would have multiple co-benefits is to **decide to look again at the Flood Schemes it has agreed with the Office of Public Works**. It is accepted amongst a large cohort of the public that the Arterial Drainage Act is not fit for purpose.

The Lee is in many respects, now more than ever, a gem of an asset for the city and for the people. These hard engineered designs are not in the direction of travel of so many other EU Countries and risk us breaching many of the EU Directives that we are already not complying with very well such as e.g. The Water Framework Directive & Floods Directive, Birds and Habitats Directives.

If we are really committed to climate change and biodiversity action then **we need to make room for the river and reorient towards it as a focal point for the city and the multiple deliverables a healthy river system gives the city.**

The Urban Water Agenda 2030 and the European Environment Agency report attached attest to this. The OPW may claim that the Lee is too long for nature based catchment solutions yet a project of hard engineering on the Dyle River in Belgium (86km) was successfully changed and one of the examples the Guadiana in Spain is 818km!

**Addition – a definition of a green space is needed** and to understand green infrastructure zoning.

**Food production in City** (with expansion more agricultural land) opportunity to transform to organic/ plant based. City says this is Dept Agric but **the Plan is about land use so it needs to be stronger in stating that as an objective and that they will work with farmers & Dept to support this transformation.**

## Chapter 9 Environmental Infrastructure

- Light pollution is not being adequately addressed in the planning process e.g. problem with pillars of light from the Dean which we are trying to address directly with the hotel through Cork Sky Friendly campaign.

### Conclusion:

We appreciate it is not within the gift of the city to have autonomy or resources for everything so a lot in the Plan can end up just being aspirational. In support of the plan and those tasked with a duty to implement we would support a national call to support greater responsibility and resources to be devolved to the local authority.

The successful implementation will depend on the quality of internal and external collaboration, proofing properly against the aspirations and policies referenced, good leadership and governance

and the shared intent of all stakeholders in the city to support the transformational change required in these crucial years.

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