

Submission on the preparation of the new Cork County Development Plan 2022-2028

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Overview

The new County Development Plan (CDP) is an opportunity to set out the vision and means by which Cork can realise its potential and lead the way in sustainably, locally-focused, and inclusive development. It is essential that the CDP is produced with an internal coherence that prioritises sustainable support of local communities across the county. The Cork County Development Plan Review Public Consultation Document (PCD) presents the priorities from the Council's perspective. As the process moves forward, we hope that the views of communities, organisations, and individuals will be evident in the published draft plan. We welcome the opportunity to contribute to the process.

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1. Principles

The following principles should inform the vision and core strategy, and shape the CDP's objectives and measurable outputs.

Sustainability

The next decade is a crucial time in addressing both the climate and biodiversity crisis, it essential that the sustainable and environmental components of the plan have prominence and priority. All planning and development decisions need to demonstrate how they address national and international environmental obligations. In instances where decisions involve a conflict or discord between the sustainable objectives and others, the sustainability ones need to take precedence.

In particular, the CDP should establish how all aspects will address the Adaptation Goals, Objectives and Actions of Cork County Council's Climate Adaptation Strategy 2019-2024, including:

“Objective: To Integrate climate action considerations into land use planning policy”
Action No.38: “During the Review of the Cork County Development Plan and Local Area

Plans identify and integrate climate change as a critical consideration, guiding principle and strategic objective, and tailor planning policies to reduce the vulnerability of Co. Cork to the impacts of climate change, for example by: Enhancing the role of the natural environment to promote climate adaptation through promoting green infrastructure.”¹

Locally focused

The plan needs to value and emphasise developments that emerge from and support local communities. It should foster small-scale employment, sustainable housing, and locally provided services that can keep people living in their locality. The Covid-19 crisis has revealed the vulnerabilities of global systems and supply chains. The next plan needs to nurture local networks across sectors from agri-food to tourism.

Inclusive

In both its operation and objectives, the plan needs to be centred on an inclusive approach that actively engages all members of the communities and incorporates their perspectives. It needs to be precise on the measures by which developments, consultations, and operating systems will meet the needs of older people, people with disabilities, children, and members of vulnerable groups. Local communities should be prime movers in strategies to maintain their own communities, all major projects should emerge from partnerships with local communities.

Proactive

The plan should establish targets in each of the sectors and proactively achieve them in partnership with community groups, non-profit organisations, businesses, and government departments and state agencies. It needs to shape how the county will develop in conjunction with the City Council to enable the county realise its full potential.

2. Housing

The plan should recognise that housing is a fundamental right; one that is needed to ensure that our people can live dignified lives without undue financial hardship, precarity or stress. And, it should proceed on the basis of facilitating increased publicly and privately provided housing to cater for anticipated needs across the lifetime of the CDP. It needs to ensure adequate provision of social, affordable, and specialised housing. There is a need to prioritise the use of public land to build affordable and social housing.

¹ Cork County Council (2019) *Cork County Council Climate Adaptation Strategy 2019-2024*, Cork County Council, pg.53.
<https://www.corkcoco.ie/sites/default/files/2019-10/Cork%20County%20Council%20Climate%20Adaptation%20Strategy%202019-2024%20Final.pdf>

The CDP should make specific reference to:

- Targets for Specialised Housing Requirements, including the numbers of social housing, affordable housing, and sheltered housing which will be provided by the Council, non-profit groups, and commercial developers.
- A commitment to permanently house all families and individuals on the housing list within the lifetime of the CDP
- A commitment to strengthening supports and understanding around the Sustainable Rural Housing Guidelines
- A focus on using vacant housing and derelict buildings for housing, through all the mechanisms available to the Council
- Meet and surpass ReBuilding Ireland targets for Social Housing Build, Acquisition and Leasing Delivery,² and the targets of any successor schemes.

3. Towns and Villages

Town centres are at the heart of our communities and should be playing a key role in developing our county to its full potential. Inclusive social towns and villages: already some towns in West Cork are trialling opening up streets to business, pedestrians, and cyclists as we recover from the pandemic³, there are many opportunities now to creatively think about how we can use main streets to encourage local businesses and attract new visitors.⁴ There should be a continuation of the aim in the current County Development Plan to

support and further develop the role of town centres in their evolution as inclusive, diverse and attractive service, recreational and living centres for residents and visitors alike.⁵

The retail sector is contracting in most of our town centres, with some never fully recovering from the last recession and the uncertainty created by the pandemic is worsening the situation. The County Development Plan Review Urban Capacity Study charts the decline of the retail sector across Cork towns; for example in Bantry the retail comparison sector fell by 29%

² <https://rebuildingireland.ie/news/details-of-social-housing-delivery-on-a-local-authority-basis-for-2019/>

³ <https://www.yaycork.ie/in-kinsale-streets-have-been-closed-to-cars-so-every-sunday-can-be-a-family-fun-day/>

⁴ http://www.cyclist.ie/wp-content/uploads/2011/01/Pocket-Guide_Redesigning-your-street_Sustrans.pdf

⁵ Cork County Council (2014) *Cork County Development Plan 2014, Volume One: Main Policy Material*, Cork County Council, pg. 106. <http://corkcocodevplan.com/>

between 2013 and 2017,⁶ and it fell by 26% in Skibbereen.⁷ These figures indicate the fragility of our town centres and the need for the next CDP to support the enhancement of the urban area. A key message from the national *Retail Planning Guidelines* is for planning systems that retail development 'takes place in city and town centres.'⁸ Small businesses, retail, and the hospitality industries have been disproportionately impacted by the Covid-19 emergency. At this time and in the recovery period all efforts need to be made to support them and developments that are based in towns helping to secure and grow existing communities and family-run businesses.

Town centre vacancy is becoming a major issue throughout County Cork. The 2019 County Development Plan Review Urban Capacity Study recommended that:

Finding new uses for vacant units brings new people and opportunities back into our towns and allows everyone to benefit from the financial investment that has already taken place in public infrastructure.⁹

The CDP needs to put in place frameworks to ensure that all empty and derelict buildings in towns are developed to provide employment and increase commercial and social opportunities. This would work towards promoting increased densities in our towns and particularly areas as outlined in the PCD with good public transport links to facilitate compact growth, allowing more people to live closer to employment, shops and services.¹⁰

Additional actions to support towns, including:

- Building and maintaining accessible and inclusive public spaces for all the community
- Facilitating the pedestrian of streets to support local businesses and attract tourists
- Ensure adequate street furniture for people with disabilities and mobility impairments
- Developing playgrounds in all communities, including a provision that all developments over 50 houses, in total, should include the building of recreational facilities for children and young people.
- Ensuring public toilets are open and serviced in all towns and villages.
- Build public swimming pools and leisure facilities in every town with over 5,000 people (including its hinterlands).

⁶ Cork County Council (2019) *Urban Capacity Study (Background Document No. 5)*. Cork County Development Plan Review, Planning Policy Unit, pg.21. Available at: <https://www.corkcoco.ie/sites/default/files/2019-12/Background%20document%20no%205%20Urban%20Capacity%20Study.pdf>

⁷ Ibid, pg. 202.

⁸ Department of the Environment, Community and Local Government (2012) *Guidelines for Planning Authorities Retail Planning*, Department of the Environment, Community and Local Government, pg.2.

⁹ Cork County Council (2019) *Urban Capacity Study*, pg. 253.

¹⁰ Cork County Council (2020) Cork County Development Plan Review - Public Consultation Document. Available at: <https://epublishbyus.com/ebook/10049041/html/index.html>

- Prioritise the planting of trees and flowers in existing and new developments, and on streets.

4. Transport

The CDP needs to establish the landscape to move to a more sustainable transport model. The PCD shows that there is still an excessive dependence on private cars and that more ambitious measures need to be included in the new CDP if the objectives are to be realised.

- Maintain the quality of the roads to improve safety and accessibility
- Connecting towns and villages: There are incredible social, environmental, and tourism benefits from creating a network of segregated cycling and pedestrian paths that would connect rural areas.¹¹ We have already seen the success of greenways in Waterford and Mayo, we need to replicate this nationwide¹². Using the former Cork, Bandon and South Coast Railway route¹³, we could connect Baltimore and Skibbereen, or Inishannon and Bandon to start with.¹⁴
- Holistic approach: a clear strategy to enable an interconnected Cork. Piecemeal and limited projects are not good enough anymore, we can start off with obvious projects, such as connecting Riverstick and Belgooly or Dunmanway and Drimoleague, but they need to be part of a larger vision.
- Work with bus service providers, especially Bus Éireann, to build sheltered bus stops in all towns and villages
- Integrated planning: transport systems and regional plans need to work together to facilitate sustainable transport, with government and local authorities prioritising walking and cycling.¹⁵

5. Coastal and Island communities

The plan should recognise the particular challenges faced by coastal and island communities. Our marine resources offer rich opportunities for sustainable development that balances socials, environmental, and economic factors. The CDP should outline ambitious targets to

¹¹ https://ec.europa.eu/transport/sites/transport/files/cycling-guidance/sutp_fact_sheet_h-06_rural_cycling.pdf

¹²

<https://www.irishtimes.com/news/ireland/irish-news/waterford-greenway-can-transform-tourism-in-county-says-top-official-1.3440709>

¹³ https://en.wikipedia.org/wiki/Cork,_Bandon_and_South_Coast_Railway

¹⁴

<https://www.irishtimes.com/news/environment/council-advances-plans-to-develop-abandoned-rail-lines-in-cork-1.1488563>

¹⁵ <http://cyclingforall.ie/#inte>; https://drive.google.com/file/d/0B7v8_RA4nxWreWJBWwHBZOVN3NIE/edit; <https://www.cyclemanual.ie/manual/planning/>

combine these elements to create industries that will support local communities and use our rich coastal and marine environments through sectors such as eco-tourism.

The new CDP should ensure a continuation and resourcing of the objective in the current plan to 'Support the inhabited islands in County Cork and to recognise the special planning and development needs of islands and island communities, particularly access, infrastructure and services.'¹⁶ The plan should also incorporate priorities from the Government's *Islands Policy Consultation Paper*, such as equality of opportunity and enabling a vibrant, harmonious society.¹⁷

The CDP should also:

- Have a mechanism to incorporate the National Marine Planning Framework when it is published.¹⁸
- Ensure all coastal and island development safeguards vital aspects of a unique cultural, physical and environmental heritage which might be threatened by over development.
- A partnership approach between island communities and the Council should be adopted in the development, implementation, and review of plans and developments affecting the islands¹⁹
- Prioritise the maintenance of small fishing piers to support small-scale fishing which employs clusters of families around the Cork coast.

6. Natural and cultural heritage

The PCD rightly recognises Cork's rich natural and cultural heritage and the need for development to bit respect and harness it for the benefit of the communities and local environment. It needs to improve appreciation of the cultural significance of County Cork's heritage, especially its maritime tradition, rich arts sector, and passion for the Irish Language. The new CDP should shape the development of Cork to achieve this with features, such as:

- Mapping of areas of local environmental importance, in consultation and cooperation with the local community and include these as areas to be protected in County Development Plans.
- Expand schemes for local communities to maintain and develop their built and cultural heritage.

¹⁶ Cork County Council (2014) *Cork County Development Plan*, pg. 76.

¹⁷ DCHG (Department of Culture Heritage and the Gaeltacht) (2019) *Islands Policy Consultation Paper*, Dublin: Government of Ireland.

¹⁸ Department of Housing, Planning, and Local Government, (2020) *National Marine Planning Framework* <https://www.housing.gov.ie/planning/maritime-spatial-planning/maritime-spatial-planning-directive/maritime-spatial-planning>

¹⁹ West Cork Islands Community Council (WCICC) (2017). *Our vision for the West Cork Islands in 2040*. <http://npf.ie/wp-content/uploads/2017/09/0525-The-West-Cork-Islands-Community-Council.compressed.pdf>

- Fostering and encouraging local artists, arts events, and artistic practices in the wider community
- Incorporating the objectives of the *Heritage Ireland 2030* when it is published.²⁰
- Biodiversity loss is one of the biggest challenges that Ireland faces. The CDP needs to follow the National Biodiversity Plan, especially objective 1: 'Mainstream biodiversity into decision-making across all sectors'²¹
- Promote initiatives and facilities that recognise Cork's maritime and fishing heritage.
- Promotion wildlife corridors, including recognising the potential of rivers, canals, and the road network as potential nature corridors.
- The plan should allow for considerably more afforestation in the county with a clear focus on preserving and expanding our natural biome of primarily deciduous forest.
- Planting of native trees on public and private land.
- To require all flood relief and protection to first examine upstream natural based solutions when considering works.
- Develop a network of blueways along rivers and the coast, such as on the river Ilen, the Bandon River, and connecting Timoleague and Kilbrittain.
- Develop a network of greenways, particularly taking advantage of the former Cork, Bandon and South Coast Railway route.
- To map and remediate barriers to fish migration within their riverine systems.
- Create native Woodland Walks and Wildflower Meadows in existing and new parks.
- Encourage the creation of wild picnic bench spots in office developments and (where practical) the creation of rooftop gardens in offices and apartments
- Have all hedgerows assessed while making planning decisions and that priority is given to maintaining and protecting existing hedgerows and trees. Where additional or replacement planting takes place native species should be used.

7. Improved public involvement

Communities should be at the heart of the development plan. Planning should harness and actively employ the capacities of communities to shape and direct projects and developments. Under current and planned policies and structures, the public and local stakeholders are too often unable to meaningfully participate.²² In addition, recent campaigns in West Cork,

²⁰ <https://www.chg.gov.ie/heritage/heritageireland2030/>

²¹ National Parks & Wildlife Service (2016) National Biodiversity Action Plan, 2017-2021, Dublin: Government of Ireland, pg. 26.

²² CoCoNet (Coastal Communities Network) (2004) *Coastal Communities Network (CoCoNet) INTERREG IIIA Final Report*, Cork: Coastal & Marine Resources Centre (University College Cork); Marine & Coastal Environment Group (Cardiff University).

including the Save Our Skibbereen Project²³ and Bantry Bay - Protect Our Native Kelp Forest²⁴ illustrate the lengths local communities have to go to challenge planning decisions, which are conducted at great financial and temporal expense. Instead, a participative framework should facilitate the incorporation of public concerns through accessible, proactive, and progressive approaches. The next CDP presents an ideal opportunity to re-imagine a more participative and civic form of planning.

I echo the submission of the Skibbereen My Town, My Plan group who point out that “there **MUST** be ‘**a genuine partnership between the public and private sectors together with town residents**’ and thus, the public sector must, not only consult with the residents during the writing of the county development plan, but must also ensure administrative, financial and governance support for the considerable voluntary work that groups put in to realising this vision. [original emphasis]”

The situation could be improved through the following methods:

- Creating structures in each town, village, and, area for community groups and residence to contribute to decision-making
- Create mechanisms to fill the void left by the unwarranted removal of town councils
- Enabling an independent assessment of current participatory processes against established standards, such as Hart’s Ladder of Participation
- Incorporating the results of research conducted in these area, including, but not limited to: Public Involvement in Environmental Decision-Making in Ireland by Dr Brian Motherway²⁵ and Enabling Citizens: A Two Way Street by Edmond Grace SJ²⁶
- More prominence needs to be given to enabling participation of whole communities, including greater flexibility to incorporate youth voices and people with disabilities; see: UNICEF’s Children’s Participant: from tokenism to citizenship²⁷; Children and young people’s Participation by Professor Mary Kellett²⁸; UN Human Rights studies and papers.

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²³ <https://saveourskibbereen.ie/about-us/>

²⁴ <https://www.bantrybaykelpforest.com/>

²⁵ https://www.tcd.ie/policy-institute/assets/pdf/PIWP03_Motherway.pdf

²⁶ <https://www.wheel.ie/sites/default/files/media/file-uploads/2018-08/Two-Way%20Street.pdf>

²⁷ https://www.unicef-irc.org/publications/pdf/childrens_participation.pdf

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[https://www.open.edu/openlearn/ocw/pluginfile.php/617769/mod_resource/content/1/e807_reading_chpt3_chi
ldrenandyoungpeoplesparticipation.pdf](https://www.open.edu/openlearn/ocw/pluginfile.php/617769/mod_resource/content/1/e807_reading_chpt3_childrenandyoungpeoplesparticipation.pdf)

²⁹ <https://www.ohchr.org/EN/Issues/Disability/Pages/StudiesReportsPapers.aspx>