

June 26<sup>th</sup> 2023

# **Public Consultation on Cork County Council's *Local Economic and Community Plan***

*The Local Economic and Community Plan (LECP) is a key statutory plan prepared under the 2014 Local Government and Reform Act which outlines the objectives and actions required by the local authority to promote and support economic development and community development in their region, both by the local authority directly and in partnership with other economic and community development stakeholders. Cork County Council has commenced working on its Local Economic and Community Plan for 2023-2029 which will supersede and build on the previous LECP, 2016-2021.*

*Cork County Council has now completed Stage 1 of the process and has produced the Draft Socio-Economic Statement and High-Level Goals document. This document is available for review here.*

*We are now asking for your support in Stage 2, Public Consultation, to review this document and provide your views and opinions to help shape the future of the economy and communities in OUR county.*

Submission by:

**Cllr Alan O'Connor (Cork County Council)**

**Responding as an individual, rather than on behalf of an organisation**

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First of all, thanks very much to all those working on this document, and for the opportunity to participate in this public consultation. I hope the below comments will be useful, and can be incorporated into the document.

The headings of our goals provide much scope for comment in themselves. These goals are, of course:

1. Sustainable, resilient and empowered communities
2. A socially inclusive county,
3. A healthy and active county,
4. low carbon and climate resilient county,
5. a county that supports enterprise, and
6. a smart and innovative county.

There is a great deal of overlap in these goals, insofar as certain objectives of the plan can progress more than one of these goals. In the below submission, I will discuss how objectives relating broadly to the following three realms may intersect with the goals of the plan: transport, tourism, residential development. I will also discuss biodiversity, the objectives in general, and the SCOT analysis.

## Transport

**In the realm of transport and investment**, for communities and the economy, investment in active travel infrastructure is essential in allowing us to achieve so many of those targets.

If more people are walking and cycling, they will be healthier and more active (goal 4) and sustainable (goal 1). There is also a social benefit; they will also be more likely to meet their neighbour (goal 2).

Conversely, if we continue to invest in large-scale road-building, it will confound these goals. I'm not talking about urban roads within development, or discrete bypasses of towns, I'm talking about the kind of excessive concentration on large-scale green-field road building schemes which I think could be said to have characterised transport development in the last 50 years and more (and particularly since the large-scale motorway-building phase began in that time).

The ongoing Dunkettle project sees over 200 million euro spent on an upgrade of a junction which has been in place for only thirty years. It will itself be obsolete in time if we continue car-based development. Even now the county supports the potential construction of a car-dependent retail outlet centre in the N25 corridor. One would wonder whether residential developments in the area, similarly, were considered to be dependent on new road capacity released via the Dunkettle junction (e.g.

<https://www.irishexaminer.com/property/residential/arid-40799223.html>).

The Macroom bypass may have been well conceived as a discrete bypass of that town, though its scale – 22km of dual carriageway, is again excessive. I think the An Bord Pleanála inspector had even recommended that there was no need for it to be dual carriageway grade all the way.

The NM20 project may again see arguments in favour of a brand-new motorway (and I think this has emerged as the preferred option) alongside the new Mallow Road, rather than improving the existing road, and incorporating discrete bypasses of towns.

As well as being spatially inefficient in themselves, these large roads lock in unsustainable transport modes, at huge expense.

While safety may be an issue at some points, it is well-established that traffic inducement, and the spatially inefficient nature of road-based travel, mean that increasing road capacity is a forlorn exercise in relieving congestion. It will never achieve that goal so long as the focus is on new road-building, and so long as the assumption is that most people will travel by car. The resources involved in their construction represent an enormous opportunity cost – the alternatives we never explored.

Economically, as well, the cost of car-dependency is huge. A 2012 study on the ‘true cost of automobility’ showed that the externalised cost to Irish society (taking into account accidents, air pollution, noise pollution, climate change, etc.), was approximately 2.9 billion euro per annum. That figure, which takes into account tax and insurance recouped (about 373 billion euro across the EU) shows that car travel is massively subsidised by non-drivers. Then there is the internalised cost, to car-owners – of fuel, insurance, cost of the vehicle itself, etc. According to the AA’s 2019 motoring finances survey, running a family car for a year costs, on average, €10,593.268. Add to this the price of road-building and maintenance.

**Except where minor improvements increase safety, an assessment of external, and internalised costs show that continued investment in new road capacity is unprofitable economically, and unsustainable environmentally. It must be discrete, if considered at all.**

**Ultimately, in the emerging climate and environmental context (the Climate Action and Low Carbon Development Act, the Paris Agreement, likely EU legislation, etc. etc.), the need to move away from such a transport model is becoming a legal imperative.**

We’re seeing a little of this shift in the construction of new active transport infrastructure such as that in east Cork and elsewhere, and the planned investment in our rail and bus networks over the coming years. We need to do more, and concentrate our resources in this direction.

This shift is something we should be embracing. The county must turn away from road-led development, away from car-dependency, and set high ambitions for modal shift to active and public transport. Prioritise and support rail and bus, cyclists and pedestrians.

I must of course emphasise that usual rider, that there will always be vehicular traffic in some form akin to that of the private motor vehicle, and some form of road to carry them, to carry buses, for cyclists, etc. For some, they are awaiting the necessary public transport and safe active travel links, which is where investment should fall. Facilitate those who need to drive, but place cars in general lower down on the priority list (as is considered in DMURS).

As mentioned, this will have benefits not just for communities, but for our economy as well. After all, people will want to live and work in healthier, happier, communities, and companies will want to locate there as well.

This all connects, furthermore, with goal 6. Moving away from car dependency would be smart ...becoming an active travel county (we could declare ourselves as such, and define what it means) would be innovative, certainly in an Irish context, with objectives and vision to match.

## Tourism

**In the realm of tourism**, there is also a need to move away from unsustainable modes. The role of aviation and shipping must be investigated.

I know that the cruise industry brings many benefits to Cobh and elsewhere, but its full cost (including environmental) and its long-term sustainability can be questioned. As appropriate to our climate and environmental ambition, we need to shift our emphasis away from short-term, highly unsustainable modes of travel and tourism, towards slower, more ecologically sound ones.

This change may well happen whether we like it or not, within the context of the need to act on climate. There is no guarantee that future technology will make aviation and shipping more sustainable, and, indeed, neither should we be crossing our fingers and hoping it will. Regulation may have to come in from outside which forces our hand. Better to be prepared and begin the shift as soon as possible.

We need a model and vision of tourism in the county which seeks true sustainability, and seeks to tease out how that would actually look, in practice, in detail.

The tourism piece can be connected with the transport piece, quite easily. One might ask what makes a particular community attractive, not just for people to settle there permanently, but to visit?

At the moment I think we tend to focus too much on point-to-point travel, in transport and tourism. Under the cruise model (and elsewhere), certain tourist hotspots are identified for tourists to be bussed to and from – Cobh, Blarney Castle, Jameson, Charles Fort, etc. Point-to-point, with the inbetween of no consequence.

I may exaggerate slightly, I know the landscape of the east Cork area and its value is noted in e.g. the County Development Plan.

I can give some idea of what I'm getting at with reference to my local area of Carrigtwohill. I know its beauty, its potential. Not just in the castle, but in the vernacular buildings and the countryside in general, if it were treated sensitively. I don't think there's any part of the county which is without charms, but which loses its charm when it is car-dominated. In Carrigtwohill's case, it feels as though it has acquired the label of 'commuter town,' a place which lives in opposition to a place of employment, with people travelling from their bed to their sofa to their job (via car) and never taking part locally. A place to pass through for tourists.

Now, that is of course a highly simple characterisation, though Carrigtwohill, and places like it, with the proper infrastructure, and with sensitive and quality development, become places

to explore and discover. I'm sure the new shared active travel pathway from the city to Youghal (currently most complete in Glounthaune) can unlock that to a great extent.

And I think that's sometimes the best part of a holiday. The stuff you can find on the way. The journey. And that's what a sustainable tourism model would look like. Inviting people to arrive somewhere in Cork, and set off and explore, in a safe and pleasant and enjoyable manner.

I love, by the way, the inclusion of the picture of Barryscourt Castle in the document, on p.58. Perhaps it should be on the cover! Anyway, I know the value of this place is recognised, and it is of course a hugely important part of our cultural history, the fabric of who we are, connecting us with those who have gone before as an important symbol of the past in our village ...in our town. It's not just a 'tourism asset.' But if such places can also play that role, the thing is, is that there are other, what might be called micro-heritage places all over. The old stone walls, the old cottage ruins, the large trees, the ancient cemeteries, the small fields, the wells, the big houses, etc. etc. all over Carrigtwohill and the county. One might cycle from Cobh to the castle in Carrigtwohill, via Fota, and onto Middleton, Ballyannon House, Ballyvodock Castle, etc., and all the places in between. Or Knockraha, where there is incredible heritage abound. Sometimes even on private land, these might, in some cases, become feasible destinations or way-points for tourists. There is an unbelievably beautiful, bi-vellated ring-fort in the hills above Carrigtwohill, for example. The view is spectacular. The Earl of Tyrone, Hugh O'Neill, camped there in 1599, before he laid waste to the area when Lord Barry down in the castle refused to join his cause. This is just an example, and of course the landowner in question may not be in a position to open it up to the public, and may be unwilling as well. And that's fine. Not everywhere can become a destination for masses of tourists, of course, and there would come a point when one would rather people didn't visit in large numbers to maintain their integrity, but that is a separate issue, and there are so many places like this all over so as to dilute the effect. We need a new artist's eye, as was the case when the romantics perceived the beauty of nature, to understand and appreciate the places beneath our feet. And not just for tourists, either, but for their communities. Tourism, though, could help create interest in these places, fund them, their upkeep, signage, etc.

What is not needed is the current proposal for a retail outlet centre in Carrigtwohill, or developments of that kind. This is planned as another 'point' in the map, for people to travel to, by car mostly, passing through the rest of the country without engaging with it.

And that comes back to the transport aspect. Because not only do cars detract from the beauty and attractiveness of a town, with noise pollution, air pollution, visual clutter, danger etc., which also dissuades people from cycling, but cycling and walking itself, is a wonderful and free way to travel, for people of all ages. It's a mode of choice for people who like to saunter. One can stop at any time and smell the flowers, or admire an old stone wall, or a view. It aligns with that vision of a slower, more integrated, fine-grained, tourism approach.

Again, I'm creating something of a caricature of tourism in the county, though I think it has a good deal of truth in it, particularly how we seek to attract foreign tourists.

So, I think we can be ambitious here as well. **Move from the plane-bus, or cruise-bus, point-to-point mode of tourism, towards a more exploratory and journey-based tourism. A 'Camino-isation' of Cork, if you like. Why not work towards creating a network of walkable and cycle-able links in the county, between settlements – towns and**

**villages, and identify those places along the way, and encourage sensitive development of our towns, residential areas, countryside, etc., so that it is beautiful in itself, for tourists and people who live there.**

Of course, we are on an island: plane and boat are the only way to get here. But how can we do it sustainably? Can we invest better in our ferries, between here and the continent? Connect those ferries better with public transport? How does a ferry compare, in terms of carbon footprint, with aviation and cruise travel? I'm sure they would compare very favourably, but that should all be part of the plan's assessments, and feed into its goals. That's what modal shift would mean at that juncture.

Such a model would not only be more attractive and sustainable, but it would be somewhat innovative, I think, smart, and it would foster local enterprise as well (goals 5, 6) – perhaps more small B&Bs and guesthouses in smaller settlements taking the role of the cruise ship's bedroom over however many weeks people intend to be traveling for.

And this may require change, and rule out certain styles of tourism, but change is an inevitable part of taking action on climate and sustainability. And we are at a point now where that change must be 'rapid, far-reaching and unprecedented' according to the IPCC. If my proposals seem radical, that is because they must be. We can't go on as we have before. Certain things will no longer be possible, so let's get ready for the change now, and start moving in that direction. A truly sustainable model would, in itself, be attractive to tourists. Come to Ireland, travel slow, get here by ferry if you can.

### Residential development

**In the realm of residential development**, compact, high-density development is a must. It feeds into the tourism and transport piece, the sustainable communities piece, everything, feeding into the physical and mental health of our communities.

The fabric of our built environment is a key determinant in the kinds of communities we have.

In terms of tourism, generally people tend to visit the high-density areas of urban places (rather than the suburbs), or the countryside.

In terms of transport, compact settlements are a must to enable modal shift. That means not only encouraging certain modes through e.g. safe infrastructure, but actively discouraging cars, by reducing parking. The spatial demands of roads and parking spaces are one factor which makes it difficult to create more compact settlements.

It can be done well, of course, and there are alternatives to the mixture of apartment buildings and lower-density, more old-fashioned residential estate types that developers seem to be proposing at the moment to meet density requirements (particularly once you go over 50 units per hectare).

What is needed is a return to more old-fashioned modes of development, true urban development, with shared green spaces, terraced houses, low-capacity for cars, permeability for pedestrians and cyclists, etc.

I know there's a whole discussion could be had at length on this, and the government are currently moving on new guidelines for compact settlements to address e.g. building regulations. I have made a submission on that consultation, which I attach as an appendix to this submission. All that needs be said further here, perhaps, is that we know what is possible, not only all over the world, but in this country too, where such compact settlement was a characteristic of I'd say all our urban spaces – terraces, above the shop living, etc.

**There is a need, basically, in alignment with all our goals and ambitions for a better county, for more resilient communities, and for a better economy, to bring an end to suburbia.** This connects, of course, as I said, with transport, climate, tourism, liveability, goals, etc. etc.

## Biodiversity

My background is in zoology, and I can't finish without commenting on wildlife. In a sense, I feel as though I represent our wildlife as well, on Cork County Council. Our fellow creatures live in this county as much as we do, and they live among us in our communities.

In that area, I particularly welcome the recognition of the value of biodiversity, in the objective around low carbon and climate resiliency ('Implement and support projects and initiatives which protect biodiversity and support the principle of biodiversity net gain'). What I would say about that is that, once again, this objective links much more broadly than on the climate issue. Of course, forests, rivers, etc. can play a role in mitigation and adaptation, but an abundant fauna, and a healthy nature, contributes to well-being, to the beauty of our localities, to a rich experience, etc. This connects with the tourism piece, the business piece (places where companies want to locate, where people want to be), to the health and active county (witness how many people now take their strolls down to Harpur's Island, Glounthaune), etc. etc.

The most radical thing of all might be to begin **recognising that our communities are coexistent with communities of other creatures, and that an economic and community plan should take account of that.** Development may degrade habitat, of course, and it may often be preferable to have as much of Cork act as an intact ecosystem as possible, with limited or no human interference.

Development and agriculture, however, is necessary, but can be done more or less well for wildlife. This is of course the truth behind the principle of biodiversity net gain in development.

Development which is permeable for wild life, rather than a barrier (e.g. a lot of major roads can act as barriers. Walls in housing estates could have gaps beneath them for hedgehog highways). Development which creates habitat for animals alongside habitat for humans (e.g. in landscaping).

Our kinship with life is also of course a fundamentally necessary step anyway in the creation of a resilient and liveable environment. This is the reality of what is meant when I talk about needed to tease out the detail below the high-level objectives. What will this all actually look like. What will it *not* look like. The detail, as well as what it will *not* look like, is a subject I will touch on in the next section.

## Looking at the objectives, SCOT analysis

When I look through the objectives related to each of the goals, in the draft document, I see much that could easily be said to align with the thrust of what I am saying above. Supporting sustainable, resilient and empowered communities for example, by ‘Facilitating the delivery and promotion of active and sustainable travel infrastructure.’

I think, seeing as there is so much overlap in all these areas (e.g. the positive benefits of active and sustainable infrastructure for all goals), there is scope perhaps for some kind of Venn-diagram type representation, or perhaps a table of objectives, followed by the number of the goals to which they apply. E.g. ‘Objective X applies to goal 1, 4, 5,’ etc.

This would graphically illustrate what actions might have the greatest weight in achieving our goals as speedily as possible. Not necessarily a prioritisation, but it may be useful as a graphical representation.

Then, on the detail piece: something I find with a lot of plans and policy documents, is that objectives, goals, etc. often seem a little *too* high level.

Looking through them, I don’t think I disagree with a single one. Nobody could. I’m being simplistic I know if I characterise objectives as being on the level of ‘be more sustainable,’ and when you dig down into these objectives, of course they become more controversial perhaps, or their radical nature is revealed. E.g. the objective to ‘support the implementation of the climate action plan’ will force radical change, once we know the implications.

What I’m saying is that perhaps, as well as trying to integrate my above points into objectives (which they mostly already appear to be in the very broad sense, and I suppose they can be boiled down to – in transport: become an active travel and public transport county/move away from car-dependency; in tourism: become a slow-tourism county/move away from unsustainable modes of tourism; in residential development: return to compact, sustainable development/declare an end to suburbia), a little more should be teased out into what exactly that means.

And that leads to my final point, because as well as recognising what things might look like, it’s important to acknowledge what they will not look like. And that could be captured in a description of not only a vision, but in terms of threats and tradeoffs. E.g. in terms of threats, we risk undermining goals if we continue doing X, and in tradeoffs, if we are to fulfil objective Y, then the following must change.

The SCOT analysis lists threats. It’s really interesting to see that, because I feel there is a tendency sometimes, and perhaps it is just my perception, to describe only in positive terms what we intend to do in these kinds of documents ...we’re going to be more sustainable ...We’re going to have more biodiversity ...we’re going to do that by supporting this and that.

There’s sometimes, it seems, more of a reluctance to address the problems, I think, to name them. It’s like the public secret, as perhaps a sociologist might say.



Something listed in the threats is ‘Decrease in the diversity of farm output and an increase in intensification, especially in dairying and cereal areas.’ I agree. And it’s important that this and other threats are named.

I think, though, that the threats section might be expanded to include some of the problems I’ve highlighted, in each of the realms. Car dependency and investment in large-scale road-building projects; unsustainable tourism model; continued suburban development.

We need to identify the problems, and move away from them, as well as identifying positive action. You can’t bake a cake with cement, and we can’t implement the goals of this plan if we continue to support retail villages, cruise tourism, large-scale road building, suburbia, etc.

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I hope you can make something of the above. It was something of a stream of consciousness, and I do appreciate the work ye are doing on this plan. If you could incorporate my points, name the threats congruent with them, embrace the detail, and get radical, I think it would absolutely help in the achievement of our goals, which are truly radical, once you dig down into the implications.

Mise le meas,

**Cllr Alan O’Connor**

Appendix: submission to the public Consultation on the Approach to Replacement of 'Sustainable Residential Development Guidelines' (2009)

April 27<sup>th</sup> 2023

## **Public Consultation on the Approach to Replacement of 'Sustainable Residential Development Guidelines' (2009)**

*The Minister for Housing, Local Government and Heritage has prepared a paper outlining the proposed policy approach towards a revision of the 'Sustainable Residential Development Guidelines' (2009) and their replacement with Sustainable and Compact Settlements Guidelines for Planning Authorities. The paper outlines how these Section 28 Guidelines now require replacement, noting the evolution of wider policy since their adoption, in particular, the National Planning Framework (2018).*

by:

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**Responding as an individual, rather than on behalf of an organisation.**

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## **General introduction**

Thank you for the opportunity to engage in this consultation with respect to emerging policy approach with respect to development standards and density.

I'm a local councillor (Cork Co Co). I welcome the move to produce a Sustainable and Compact Settlements Guidelines for Planning Authorities, guidelines which should facilitate the future appropriate to the development of our urban areas for greater social and environmental sustainability.

I support the *National Planning Framework's* National Strategic Outcomes, particularly with respect to more compact settlements. I await the publication of the draft guidelines on compact and sustainable settlements with interest.

Please find below some general comment on the *Sustainable and Compact Settlements Guidelines for Planning Authorities Proposed Policy Approach Consultation Paper – March 2023*. This document is referred to in this submission with the initialism *CP*. The imminent draft guidelines for sustainable and compact settlements, I will refer to by the initialism *DG*.

## **Defining your terms, the end of suburbia, and the move towards urban and rural patterns of development**

The end of suburbia must be a central tenet of any proposed guidelines. This is mildly alluded to in p.12 of the *CP*, where the continued application of suburban standards is described as hampering innovation.

What one defines as suburbia can vary, of course (and such a definition would be useful in the *DG*). Broadly speaking, I would consider suburbia to mean car-dependent development, generally comprised of housing at a low density, perhaps up to 30 or 40 units per hectare. Even at 30 units per hectare, for example, I'm seeing applications for development come in which are still making space for two parking spaces per unit. The terms suburbia and sprawl can be used interchangeably, I suppose, though the latter can also cover more disparate, separate developments of individual one-off houses, and their collective effect over a wide area.

Of course, while it is possible to reduce suburbia to numbers such as density, parking spaces per unit (and maybe there are other measures, like average distance to a shop, bus-stop, etc.), there are other, more qualitative definitions. Lewis Mumford described suburbia as the 'collective effort to live a private life.' These kinds of definitions speak more to the inherent problems with the suburban model, in terms of the difficulties for the fostering of community, and social life in a built environment, which arises from car dependency. These are as worthy of attention as the environmental problems.

The *CP* notes the reasons for why the 2009 *Sustainable Residential Development in Urban Areas Guidelines (SRDUA)* recommended a move towards higher density. The *DG* must expand on these to make mention that there is a need to improve the quality of our town spaces, on the other, well-known difficulties with suburbia, in terms not only of social difficulties (car-dependency and community severance, health problems through risk of accidents, pollution, etc.), economic difficulties (cost of services to sprawling areas, and their

continued upkeep, the cost of automobility (hidden and otherwise), and of course those environmental difficulties.

Once suburbia is defined, it must be banished. Future development must be considered as being either ‘urban,’ with the associated building typologies, and exclusive of those qualities which typify suburban developments, or ‘rural.’

To loosely define the two, one might call urban that development which takes place in, or adjacent to (as an outgrowth of) an additional built up area, be it a village or a city, whereas rural will usually pertain to individual dwellings outside of existing built up areas, to service the needs of those who need to live in the countryside. Obviously, another aspect of sustainability is the restriction of rural development, but in order to encourage people to embrace urban living is the quality of that built environment, which is another aspect of the guidelines, which I will discuss later.

**Overall, the *DG* should define its terms (urban/rural/suburban, etc.), both quantitatively and qualitatively. The *DG* should explicitly herald the end of suburban development.**

### **Densities and settlement size**

One of the more noteworthy aspects of the *CP* is its bracketing of settlement types, by population as a proxy for size, with recommended density ranges by settlement size. Following on from the above with respect to the need to establish urban patterns of development, I do not agree with, or understand, the proposal that small and medium sized towns (between 1,500 and 10,000 people) and rural towns and villages (up to 1,500 people) would continue to be allowed to develop at densities of less than 30 units per hectare (uph). Naturally, these are figures which are plucked from the air, they’re not natural numbers like the gravitational constant, and we must settle on one.

However, in the context of densities, and it is something I am coming across in my conversations with people, there does seem to be some conflation of figures for ‘density’ with ‘volume.’ A development of ten units, for example, can be executed at 40 uph density, or 2 units per hectare. These are still ten units.

I’m from Carrigtwohill. Thirty years ago, the village had a population of less than 1,500, easily. Now it is almost 10,000. Under the approach mandated above, the land closer to the centre of the village (though still peripheral, as the village was a main street, so little scope for infill) could be developed at lower densities, up to 30 uph, until such a time as the population reached 10,000 (which it will likely do in the next decade), from which it will then be proposed to develop at 40-150 uph in the town centre and urban area, and 30-80 uph in ‘suburban’ and edge areas (again, the *CP* shows the continued assumption of suburban growth). In which case the one-time village, now a ‘large town’ (or maybe a metropolitan town – it is close to Cork – this too needs definition), will be left with a suburban core, and a high density edge, so repeating the mistakes of the past.

I recognise Carrigtwohill is perhaps an exceptional example, but we have to finally begin thinking long term – in terms of multiple decades. With better transport connectivity in the next couple of decades, no town or village should be considered ‘rural,’ only as towns and villages, with development appropriate to same. Such improved transport connectivity might

include cycling connectivity (an approximately 10k cycling commute is certainly not unreasonable on good infrastructure) and the introduction of e.g. shared vehicle models, which will no doubt come in eventually, as well as allowing for continued ownership of car-like mobility by those who need it (such as those with reduced mobility), though these cars might be of a different kind – themselves more compact.

Obviously, once you begin to exceed 100 uph, certain building typologies become mandatory, and this argument can be had at this kind of figure, but I don't see why a currently rural village should not expand its urban pattern for a development of e.g. 10 units in a more compact, high density way (the two terms being almost interchangeable effectively), rather than being allowed to continue suburban patterns of development (or even rural ones attached to the settlement) until such a time as their population crosses an arbitrary threshold (unless there are particular reasons for using 1,500 and 10,000 etc., which should be described).

If the *DG* follow through on this aspect of the *CP*, then we will have neglected to facilitate compact development in a large proportion of our built environment (I'm sure there are stats for e.g. the proportion of people living in towns and villages of less than 1,500 people). We will be continuing sprawl. As p.9 of the *CP* says (and I agree), 'There is a need to carefully plan for the growth of settlements of all sizes.' However, villages are urban spaces, as much as a city is, just on a different scale.

The terms 'existing context' and 'appropriate places' (the latter in the context of the *SRDUA*) are used, almost implicitly as an excuse or reason in themselves to continue suburban/low density development. However, the context of our urban environment, historically, more high density development is completely normal. As is described in Cork County Council's current *Development Plan*, vol. 1, section 4.8.8:

*Buildings were generally arranged in terraced format, two to three storeys high usually following a perimeter block format. Within the town centres, buildings were designed to accommodate a commercial use at ground floor level with a separate access to facilitate "living over the shop". Analysis of some of these perimeter block formats in Cobh and Middleton illustrates that a combination of terraced units and living over the shop delivers densities well in excess of the 50 unit/ha high density threshold advocated in the Guidelines and the mix of uses which support compact urban living.*

The point is that this kind of development is the pattern which has predominated in our current towns, from when they were far smaller than 10,000. I know there's a whole history there of most of our building stock dating to the nineteenth century, but this is how our built-up areas should now begin and proceed. If we were planning a town in Ireland, we wouldn't begin it as a suburban development, and then build higher density around that. The future is of course impossible to foresee exactly, but foresight is exactly what this document is all about, and a continued allowance for low-density suburban development in any settlement is storing up trouble for the future. We can't afford to write new guidelines which will go out of date in ten years or so.

Obviously, this will have some limit, I understand. 400 units per hectare would not be appropriate for a village, yes. We're talking about qualitative determinations here ...but it certainly isn't at less than 30 units per hectare, and probably lies between 40 and 100 units per hectare.

**In following on from the previously discussed call to end suburban development, there is no reason why urban patterns of development, at least at a higher density as is proposed in the CP should not apply to settlements of any size.**

### **Language**

Some of the language in the document seems to be inclined towards a certain attitude towards changing patterns of development. I.e. there appears to be foot-dragging and a certain acceptance of continued suburban development. I mentioned the phrase 'existing context.' One word in particular, which I've seen in developers' applications for planning permission is 'traditional,' e.g. in the passage on p.13: 'the proposed policy approach is to support and facilitate medium density housing models in Ireland, alongside traditional housing and apartment developments.'

The word 'traditional' here is pretty loaded, I think. As mentioned above, housing in a 'traditional' context could be construed as being that urban fabric which constitutes the core of most of our towns and cities, which could easily supply well in excess of 50 units per hectare. Are Georgian squares traditional? Are thatched cottages? The implication above, is, I think, that a 'traditional' house is detached, or semi-detached, it would probably include most of the suburban development which has arisen in the last 60 years or whatever. This kind of reflex attitude must change. We need a new and better tradition, or at least to recognise that the motorcar is not a traditional basis for any kind of development, except within the last 80 years or so. Perhaps the problem in this regard goes deeper than language alone, and perhaps reflects the authors of the CP and the DG. I must admit, it doesn't bode well. Even if it is traditional, not all traditions are worth keeping, and tradition alone is not the basis for good policy.

**The language of the document should be tidied up. A word like traditional should be defined so that it can be appraised honestly, in terms of historical patterns of development, rather than used as a lazy cover and excuse for the continuance of bad patterns of development. Suburbia has to go.**

### **Parking (and a little more on transport)**

I note the apparent proposition in the CP is for car parking standards to be a minimum rather than a maximum (e.g. p.14). This is well behind the times. Maximum parking mandates, for all urban areas, are emerging as the norm, and should be applied in the DG. With minimum parking guidelines, there is a risk that this document becomes old-fashioned the moment it is printed. Cars themselves should be on the way out as a mass-transit option. The unit of movement must truly be the pedestrian and the cyclist, from now on, with larger distances covered by public transport, and the car, or car-like vehicles restricted to temporary, loan use, or for the usage of those with reduced mobility, or unusual working requirements, but, nonetheless, sidelined.

**Parking must be described in terms of maximums, with the underlying aim of moving beyond mass car ownership, in all urban spaces**

## **Examples**

I feel as though I have spent much of the last four years trying to explain to people what e.g. 80 uph is, what it can mean, the possibilities of these kinds of developments, that they shouldn't necessarily include apartments, that they can be attractive, etc. etc.

It's very important that the *DG* contain a suite of detailed examples from the rest of the world on what urban development can look like, at various densities (particularly at that 40-100 uph density). The term 'gentle density' is often used.

E.g. the Norwich schemes: EUMiesAward (<https://www.miesarch.com/work/4482>) and Goldsmith Street (<https://www.mikhailriches.com/project/goldsmith-street/#slide-2>). The density here is approximately 83 ph. The website describes them as being mostly two stories or less. Of course, high rise in Cork's *County Development Plan* is 50 units per hectare. So, if you reduced the number of units, added more open space, etc., you could still do something well over 50 units per hectare. Now, I don't know whether certain building regulations, etc. in Ireland would make it possible for developers to do this, even if they wanted, that's what the *DG* must address. The scheme above has on street parking only, which would be a radical departure for Ireland (where it appears still to be assumed that each house will have two off-street parking spaces, which take up room, making it difficult to achieve those densities).

There are loads more schemes like this – building typologies following that of any old town core in Ireland (terraced and above shop) as well would have densities well in excess of 50 units per hectare according to the county development plan's assessment. Old terraced urban cores in Cork could be in excess of 100 units per hectare, single story. Of course, those would be small houses, little private open space, no off-street parking, etc. Those are the tradeoffs which people seem to be reluctant to embrace. Another example to explore might be that of the Irish architect Dominic Stevens (<https://www.newstalk.com/news/apartment-buildings-mixed-with-houses-definitely-the-solution-1392810>). His proposal apparently accords with current guidelines in every way but one – the houses are built under the current 'apartment' guidelines, allowing slightly smaller units, to squeeze them in and up the density.

Here in Carrigtwohill, a recent apartment building was proposed at between 3 and 5 stories. That is considered high rise, and it is of course in context, but the density there is 122 units per hectare. It might be simplistic to say so, but half the density, perhaps you wouldn't need to go over three stories. Why not half the height with half the units (or you could at least take a floor off, and still be in at about 60 units per hectare). I know I'm doing some very simple back of the envelope maths on it, but I do find when people speak about density, they don't tend to have a figure in mind, in terms of units per hectare ...Manhattan might be 400 units per hectare, for example, and there's a big difference between 80 and 400, of course.

One can go abroad, as well, e.g. to the Netherlands and elsewhere for new and old developments, compact, sustainable, etc.

(<https://www.theguardian.com/world/2020/mar/15/forward-thinking-utrecht-builds-car-free-district-for-12000-people>).

Those examples should show how residential, commercial development (above the shop, etc.) patterns can be mixed, as well. A difficulty with suburbia, or a characterisation, is that it tends to be all-residential development. No community or commercial amenities or opportunities.

**It's important that the *DG* is replete with examples to describe exactly what kind of future sustainable compact development it is aiming to encourage, rather than just a series of numbers related to parking standards, densities, setback, green space provision, etc. etc. The vision needs to be made real.**

### **The numbers**

Numbers are of course very useful, and I've mentioned this above. Units per hectare, setback distances, open space provision as a percentage, etc. As implied above, my feel is that a density of perhaps 40-100 uph should become the norm for future urban development. Parking standards should be maximums, etc.

We must be careful with numbers, however. Take the separation distances. Even the *SRDUA* recognised that its standards of 22m needed to be flexibly applied. E.g.:

*... Similarly at the rear of dwellings, there should be adequate separation (traditionally about 22 m between 2-storey dwellings) between opposing first floor windows. However, such rules should be applied flexibly: the careful positioning and detailed design of opposing windows can prevent overlooking even with shorter back-to-back distances. Windows serving halls and landings do not require the same degree of privacy as, say, balconies and living rooms.*

Of course, I haven't seen many developers come up with a flexible approach in this regard. The *CP* refers to 16 metres. Another number which comes from somewhere I guess, but betrays a certain old-fashioned thinking, in tune with the language of 'traditional' housing. The *DG* should not become a means of proposing the continuation of semi-detached expansions of towns ...suburbia, just scrunched up a bit.

That would be a bad outcome. The *DG* must be better than that. The below photo, from Angers, France, shows residential development, in an urban context, with a setback of approximately ...4 metres? 5 metres? Granted, it's not the 'rear,' but there is a danger in reducing everything to the numbers. And this example can be as attractive and liveable as any. Granted, the development is centuries old, but we have to learn from the past as well. I guess it's '**traditional**' (!), and probably no different from many traditional towns in Ireland, and their alleys and old streets. It is still lived in, and it is possible. The *DG* must speak to the possibilities for better urban environments. It can't just get locked up in the numbers. The *CP* doesn't give me much confidence for the *DG*, I hope I'm not being unfair, but it's important that we do better with the *DG*. There needs to be more imagination, not just suburbia by other means.





**As I implied with the ‘examples’ section, numbers are important, but they must be cautiously used. Example and qualitative standards are equally (if not more important). Probably the most important numbers are around density and parking (with parking as a maximum).**

\*

On the basis of the above, I trust my submission will be taken into consideration prior to a decision being reached on this planning application.

Mise le Meas,

**Cllr Alan O’Connor**