



27 May 2025

Variation No. 2 Submissions,
Strategic Planning and Heritage,
Planning and Integrated Development Directorate,
Cork City Council,
City Hall, Anglesea Street,
Cork, T12 T997

Dear Sir/Madam

Re: Proposed Variation No. 2 (Cork Docklands) to the Cork City Development Plan 2022-2028

The Heritage Council was established in 1995 as a statutory body under the Heritage Act 1995 with a Council (the Board of the body) appointed by the Minister. The Heritage Council is a prescribed body under the provisions of the Planning and Development Acts 2000-2010 and S.I. No. 600/2001 of the Planning and Development Regulations, section 28 inter alia, in accordance with its functions under Section 6 of the Heritage Act, 1995. We seek to provide submissions on forward planning, development management and strategic infrastructure developments as they relate to Ireland's heritage, namely built, cultural and natural heritage.

National Planning Policy Context

It is important to state from the outset that the **National Planning Framework April 2025** identifies "Enhanced Amenity and Heritage" as one of our national strategic outcomes. Within this, the NPF correctly notes that built, cultural and natural heritage has intrinsic value in defining the character of urban and rural areas, adding to their attractiveness and sense of place. National policy objectives 85 through to 90 give further support to this ambition in county and city development plans.

The 4th edition of Ireland's **National Biodiversity Action Plan (NBAP) 2023 – 2030** was published in January 2024. The NBAP states that "local authorities play a key role in biodiversity conservation through the planning system". There are several targets identified under Outcome 2A (*The protection of existing designated areas and protected species is strengthened and conservation and restoration within the existing protected area network are enhanced, regarding designated areas and protected species*) that are relevant for local authorities in their plan making functions. However, of key importance is Outcome 3C (*Planning and development will facilitate and secure biodiversity's contributions to People*). Action Numbers 3C2 and 3C3 are especially important, whereby the objectives of the NBAP are to be aligned and integrated within the statutory land use plans. In addition, actions 1B9, 1C5 should also be key considerations for all plans.

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Heritage Ireland 2030 was published in February 2022 and details a number of action points relevant for local authorities, and these should be included in local area plans. Most importantly are Action 22 - *Introduce policies on supports for urban biodiversity and tree planting*; Action 26 - *Support nature-based solutions for land-use management*; and Action 37 - *Integrate heritage considerations into urban and rural regeneration to ensure that built and natural heritage objectives underpin the planning and development process and inform the 'Town Centres First' policy approach*.

The **Guidelines for Planning Authorities on Architectural Heritage Protection** were developed in 2004 and give expression to the provisions of the Planning and Development Act 2000, with regards to built heritage. Chapter 2 and 3 give detailed guidance on the role of statutory county level plans with regards to the Record of Protected Structures and Architectural Conservation Areas. The Office of the Planning Regulator has also provided guidance on **Archaeology in the Planning Process** through **Planning Leaflet 13**.

General Comment

The Heritage Council welcome the publication of an updated planning and design framework for the Cork City Docklands, and the associated Variation 2 to the Cork City Development Plan 2022-2028.

From the outset it is important to note that the Heritage Council supports the principle of compact and consolidated growth which achieves a mix of homes for society. Brownfield development within our settlements, from village to city, ensures that the built environment footprint is restrained as far as practicable, and therefore is not unnecessarily expansionist, which inevitably puts pressure on our natural and cultural heritage. Equally, the Heritage Council welcome land use planning approaches that enshrines the integration between patterns of development and sustainable transport. This is evident in the Planning and Design Framework for the Docklands.

The Heritage Council's primary comments relate to natural and built heritage but also include intangible heritage and civic life's engagement with place. Our comments are divided by the sections provided in the main **Volume 1: Written Statement**. However, many of our comments/recommendations would be replicated for **Volume 4 Strategies and Supporting Guidance for Strategic Locations**, which contains an overview of the design strategies arising from the Framework Plan including supplementary guidance.

Therefore, the local authority should assume that any comment on a specific aspect of the written statement should be assumed for Volume 4 also, and the same recommendation applies to the pertinent section within Volume 4.

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Specific Comment

Vision and Role of City Docks

The Heritage Council welcome the emphasis put on the importance of placemaking in the vision for the City Docklands. This ensures that the framework for the docklands is not just a numerical approach for meeting development needs. However, given the comprehensive sections that cover heritage in the plan, we believe heritage could be captured more in the vision section (10.24). We make the following recommendations (**Bold** is new text while ~~strike through~~ is deletion):

Amend the following as:

*A new sustainable neighbourhood in the centre of Cork City that benefits from **high quality design and** public realm-led placemaking, with people-centred streets and spaces, **culminating in a vibrant civic life***

Add the following bullet point:

A place that anchors off its rich heritage, where modern life sits alongside a distinct built and industrial heritage resulting in a strong character of place

We also recommend that the concepts of ‘heritage led regeneration’, and ‘placemaking around civic life’ be integrated into the ‘values’ under Paragraph 10.26.

Heritage can be incorporated into high quality public spaces and have good interpretative resources for visitors and residents alike. The Viking Quarter in Waterford is an example whereby public realm design has anchored of medieval and pre-medieval heritage assets from this historic era, by establishing an urban quarter, that is liveable and of high quality – a design that resulted in the creation of a strong sense of time depth for the city. This can also be achieved for the Cork City Docklands, based on its unique character and history. The section “A place for people” should also capture this ambition.

In addition, it is essential that ‘placemaking for people’ is not undermined by excessive provision for car infrastructure. This relates to street design, movement networks and car parking provision. It is welcome that maximum car parking standards are applied, and that car ‘lite’ developments are pursued.

Civic spaces in Ireland as well as our built historic environment have been significantly impacted by car dominated streets and public spaces. Therefore, we welcome and encourage any ambition that seeks to depart from this trajectory, particularly in inner urban regeneration areas such as the Cork Docklands.

The River Lee

The River Lee is an important ecological corridor with its quays and general engineering history being an important built and cultural heritage asset also. In this regard, we would strongly recommend that any amenity and recreational infrastructure enhancements that are to be made along the quaysides and banks be sympathetic to both the built and natural heritage.

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The area along the south bank, namely The Marina towards Holland Park and Centre Park Road, does have some local biodiversity value, with a distinctive and attractive tree lined character evident. These avenues are worthy of some form of Tree Preservation Order (TPO), if they do not already benefit from one. In this regard we recommend the following be also included as a bullet point under 10.31:

A soft landscaping approach that retains natural features and preserves the existing treelines, which form an attractive avenue on the south bank.

This should also be emphasised under Paragraph 10.68 as part of the Active Recreational Infrastructure Section.

In addition, the north bank is currently defined by a somewhat harsh and unattractive environment. The public realm improvements and connectivity from the south quarter to the area around the train station should seek to address this and we welcome some of the approaches detailed in Volume 4. Cork is a historic European port city, which is worthy of a design that amplifies people's engagement with the quayside. The framework for the docklands can and should take inspiration from recent improvements from other European port waterfronts such as Bordeaux (*Port de la Lune*).

Character Areas

The establishment of Character Areas to inform the future development narrative is an important endeavour. This builds on our previous recommendation in terms of a strong character of place, whereby we welcome that the ambition for development is to be informed by each area's defining heritage. Much of this heritage, be it natural and built heritage, cannot be recreated or replicated and offers a ready-made solution to defining place. It also ensures that development and scheme design is informed by the key environmental parameters. Accordingly, we suggest the following line be included at the end of paragraph 10.33.

Along with the key environmental constraints, the development parameters for each area will be informed by such history, via a design approach that establishes a clear interpretation for resident and visitor.

Authenticity in the development of the City Docks: Built Heritage Strategy

The Heritage Council commend and welcome the strong narrative as presented in this chapter, particularly the description of the type of built and cultural heritage in the docklands area, as well as the intangible heritage discussion. The latter is particularly important and will be essential for informing character area definition, as well as the general approach to civic public realm design.

However, this section could highlight briefly how such heritage will be managed, and how it will inform development. This is particularly important as industrial heritage is a bespoke form of built heritage. A new paragraph could be included, after 10.38, which details the following:

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10.39

“The built heritage strategy will retain the dockland’s authenticity by”

Encouraging conservation through use in the docklands for built heritage assets, including designated and non-designated structures, especially new uses that are conducive to the re-use of industrial heritage buildings.

Using existing archaeological and cultural heritage assets as an anchor for public realm design

Ensure strong interpretation through signage, street naming and street furniture which highlights the history of the area

Ensure development management standards are applied flexibly to ensure re-use of built heritage assets.

Ecology and Biodiversity

The recognition of semi-natural areas outside of the built environment is an important amendment to the framework. Aside from the sites mentioned, Holland Park as well as the area of mixed scrub/grassland and woodland adjacent to the northern boundary of Monahan Road (immediately west of the junction with Marquee Road), are other locally important biodiversity sites. We recommend the following:

Amend the first bullet point under strategic approach, as follows:

~~***Protecting existing assets***~~ ***Retaining natural ecological features and integrating these into new development, where feasible,***

Add the following to this same list:

Include existing natural features as part of the greenspace and landscaping requirements for development, with any planting regimes to be of native species and provenance

Maintenance regimes on areas of open and green spaces should be managed for biodiversity.

Conclusion

We welcome the preparation of this framework and associated variation 2 to the Cork City Development Plan 2022-2028. The emphasis on heritage is apparent in the framework, which is needed to ensure that development requirements be achieved in a manner that protects, and enhances heritage, as well as establishing more civic life through placemaking. The latter of which is particularly needed in Irish towns and cities.

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We trust these recommendations will be considered as the local authority pursues this much needed regeneration strategy.

Yours sincerely

Virginia Teehan

Chief Executive Officer

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