

# Save Cork City

The Economic Potential of Cork

Cork City Development Plan Consultation October 2021

*Every place must identify its strongest, most distinctive features and develop them or run the risk of being all things to all persons and nothing special to any.*

Nobel Prize Laureate Economist Robert Merton Solo



This document has been written in a process of collaboration by Save Cork City Community Association Limited T/A Save Cork City. Registered in Ireland No: 642820. Charity Registration No: 20205839

Special contribution by Dr Declan Jordan, Senior Lecturer in Economics, Spatial and Regional Economics Research Centre, Cork University Business School, UCC.



The Development Plan means a lot to us!

# Introduction

The Draft Development Plan does not yet support the full concerns of the people of the city; *The Public Concerned* that has left a deficit that may undermining its legitimacy. The plan does not yet take international concerns such as Habitat Loss, Climate Change and even Heritage Loss, seriously enough. The document avoids the tension between continuous economic growth and the greater issues that humanity faces relating to climate change, habitat loss and degrading of the environment which threaten our very existence. The tone of business as usual may serve our short-term drive but may also reflect our naivety and reluctance to accept the uncomfortable truths about the global challenges we face.

The plan could more forcefully recognise the vital role of the Historic City in creating economic opportunity and benefitting social wellbeing for Cork in the future. The reuse of existing buildings is low impact environmentally and working with nature on softer infrastructure and betterment creates development opportunity that is underplayed. We face a crisis of sea level rise and habitat loss that needs solutions to be integrated in our every project. Our over reliance on building of roads and the expansion of the city boundary means that we march forward with unsustainable forms of development disguised as urbanism but isolating people from a connected urban community. Every cent we spend on capital infrastructure should have a multi-benefit for society and be evaluated as such if we are to achieve sustainability. Nobody should be damaged by what we propose. No investment or environment should be allowed to be devalued without consequences. We need to make real commitment to efficiency and sustainability if we are to compete as a city in future.

The Draft City Development Plan has been prepared by hard working people and their work, carried out in difficult circumstances, is appreciated. The limitations of the plan may be found in our collective amnesia of the consequences of the impact of our consumption. There is additionally a power struggle to keep recent plans and government ambitions relevant locally that are already out of date in the consciousness of society. At no time in our history, in a World of Robot Trees, has Plato's Allegory of the Cave been more relevant. We need to speak of reality and of the truth of the matter on all issues and let go of spin and bogus argument. There is a bright future ahead of technology combined with care for heritage and the natural environment if we decide to make it happen. We need to question everything, not just to maintain and extend our standard of living but to address the viability of our society and protect ourselves from future economic difficulties. We need this Development Plan to become a better plan and partly that means becoming more concise and resolving blatantly conflicting ambitions. We could look beyond outdated thinking and embrace new ideas of the doughnut economy, circular economy and community wealth building for our city economy.

The beauty of Cork defines our identity, our uniqueness and this in turn attracts inward investment and talented people. Protecting our unique identity gives us an economic advantage. We need to save Cork City if we are to secure our future.

# What is a City Development Plan?

The Cities Alliance in Belgium describes a city development strategy as:

*“..a tool that helps a city harness the potential of urbanisation. It also enables a city to develop a coordinated, institutional framework to make the most of opportunities. And, perhaps most importantly, a CDS gives residents a chance to have a voice in the future of the place where they live.*

## The Aarhus Convention, Giving People a Voice

The United Nations Economic Commission for Europe (UNECE) Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters adopted on 25 June 1998 in the Danish city of Aarhus (Århus) at the Fourth Ministerial Conference as part of the "Environment for Europe" process entered into force on 30<sup>th</sup> October 2001.

*“to promote environmental education to further the understanding of the environment and sustainable development and to encourage widespread public awareness of, and participation in, decisions affecting the environment and sustainable development.”*

Article 7 Public Participation Concerning Plans, Programmes and Policies Relating to The Environment.

*“Each Party shall make appropriate practical and/or other provisions for the public to participate during the preparation of plans and programmes relating to the environment, within a transparent and fair framework, having provided the necessary information to the public. Within this framework, article 6, paragraphs 3, 4 and 8, shall be applied. The public which may participate shall be identified by the relevant public authority, taking into account the objectives of this Convention. To the extent appropriate, each Party shall endeavour to provide opportunities for public participation in the preparation of policies relating to the environment.”*

**The Public:** any member of the public

**The Public Concerned:** any organisation or member of the public that may be affected by proposed development or change.

## A Conflict of Interest

There is a conflict within any process whereby the needs of the governing body or civil service body are met in preference to the concerns of the Public Concerned. This observation does not contain judgement as organisation always take on a form and direction of their own. The condition does need

to be recognised though and measures taken to compensate for the possibility of the Development Plan becoming more about the interests of Civil Service or Government Institution without balanced representation for the public.

We suggest that participation which leads to change of policy should be recorded so that the results of public participation be seen and understood and can be demonstrated within the process.

The Development Plan presented is lacking in demonstrable influence of the Public or the Public Concerned. This needs to be addressed in the interests of creating a document that is *supported by* and not *forced upon* the citizens.

The City are the administrators of the Planning System and Service and this is a central role embedded in legal obligations and process. The City must no only be impartial but they must be seen to be impartial.

Mr Justice David Barniville in his ruling March 19<sup>th</sup> 2021, Bord Pleanála v CHASE stated:

*"The ultimate touchstone is that justice must not only be done but must manifestly be seen to be done," ... "It is essential that public confidence ... is maintained."*

The reason for mentioning this is to highlight that within a process to prepare the Development Plan not only must there be meaningful public participation but it must be seen to be done and that means that what the public want must be achieved and their opinion must be sought out. It can easily be argued that the needs of fulfilling a civil service agenda may be met more often than fulfilling the wishes of the public. It is also vital that it is understood that the Public do not wish to tamper with a civil service agenda but only wish for their wishes to be incorporated and added to the issue or plan in a reasonable and meaningful way and that ultimately this will fulfil the wishes of both on most issues. Where difficult issues arise open fair discussion can usually solve differences. It is worth saying that when division continues over long periods it is damaging for everyone and that a Development Plan that has not received support in the process is weakened and has failed in some way by lack of public confidence caused by a question of undue influence in the system by those who do not take part in the public debate.

## We are Cork. Maintaining Public Confidence

The We are Cork. branding is an exclusive brand meaning that it limits general use by the Public and the Public Concerned. The brand is often seen combined with the sale and development advertising of sites and in conjunction with the singular interests of private development. This may not be good policy from the competent authority acting to administer the planning process and represents an obvious conflict of interest.

It is understood that a harmonious idea of togetherness is the hope for the brand but as it promotes private interests, representation in the pages of the City Development Plan means the City Council may not be seen to be impartial or without bias which is vitally important for the Competent Authority and Statutory Body acting to implement the Planning and Development Act 2000. To maintain public confidence in the process the We are Cork. brand should not be displayed within the Development Plan

but not just for this general reason. There is a significant issue relating to impartiality and even concerning issues of perception of unfair bias in the development process using the brand as the City Council is the legal body of implementation of fair and impartial statutory Planning Process either private development or within its own Part 8 process. The Development Plan forms a foundation for decision making. The association of branding that is connected to a variety of interests may seem to devalue the impartiality of the planning and development process and should be considered seriously and gravely if it is not to undermine the process and legality of Planning Permissions. The use of the branding of private consultants should be viewed in the same way and all effort should be made to maintain a long term and credible impartial presence in the documentation which must seem to be without bias in the minds of the Public and The Public Concerned. The issue should be referred to the Office of the Planning Regulator at a minimum if the brand is continued to be associated with the Development Plan Documentation. It is worth noting that the brand has been associated with scandal relating to expense and intellectual property and has attracted ridicule as a brand of exclusion and questionable associations that doesn't have general public support.

## Harnessing the Potential of Urbanism

Procurement of public projects such as economic and urban studies or design of public spaces must be led by creative thinking. Often the need to be economic in thinking is misunderstood as requiring the consideration of auditors or financiers to lead a project. The effective way to be economical with our resources is to find multiple benefit to society in what we spend. This approach requires a design led and creative approach in line with the creative economy so well referenced in current successful urbanism. Where the city requires particular effort in this regard is in the preparation of the many project briefs it uses for the procurement of works which are often not sufficiently developed to lead to multi benefit for the public.

## Making the Most of Opportunities

For instance the new urban realm proposals for the Grand Parade and South Main Street area are driven by a need to complete and connect development proposals at the former Beamish and Crawford site. The idea is to help make a success of and to complete a project, including proposals for an Event Centre. Had the project brief included a reinforcement of the identity of the Medieval City and the Medieval Spine as well as fulfilling its own brief it may be of multiple benefit and further justified because of increased identity and tourism benefits.

As it is the project may degrade the concept of the Medieval City or the spine that connects Barrack Street to the Shandon Area. The project is seen as having a singular or limited purpose rather than searching for what may be additional creative benefits for the wider economy and the identity of the Historic City. Giving the Medieval City a character identity through the public realm could be hugely beneficial economically and not doing so is a lost opportunity and a deficit in the development of a brief for the project.

Many such missed opportunities exist at present in Cork. They could all be avoided if we asked ourselves what benefits may be found within a project and how do we make them part of the requirement of a brief that may fulfil multiple ambitions rather than just the singular ambition of the boardroom table. This kind of ambition for multi beneficial spending is central to a Development Plan. We require more engagement and more creative thinking to identify multiple opportunities in projects that are devised and designed with a singular ambition. Making the most of opportunities and using early public engagement can ensure far more advantage to Cork in what we do and is central to the policy of a successful Development Plan. We can lead on the issue by adding engagement process to the Public Concerned before project design and making this an ambition of the Development Plan.

## Economy in Design

Good design is created by nature and is the result of the balance of all that might influence something resulting in function and great beauty. The good design of nature results in many of the things we understand as of beauty within our built environment and that of plants and animals seen in nature. When we wish to create beauty, we seek to achieve balance of all that may influence a project. This influence is often based on current thinking in design and policy, greatly influenced by the brief for a project that is formulated by the employer which in the case of public works it may often be the City Council.

When we create projects that have a limited brief or that miss the possibility of identifying multi-benefits for the Public and Public Concerned the result is not balance and harmony but the imbalanced solution or even the grotesque. This occurs when one singular function or brief becomes a focus to be attained while other balanced achievements are not recognised. We must recognise that while we want development, we don't want it to degrade what we have, the opportunities we may have or the interests of existing investors or The Public Concerned. Acting in the public interest is making multi-beneficial decisions in harmony with the existing city. The Development Plan should recognise and promote this benefit and the need for better analysis and better briefs to achieve multi beneficial projects that don't cause damage to the built environment. Good design isn't just about building chic buildings, its about achieving numerous benefits and considerations that are beyond a singular ambition.

In Grand Parade we see that the development of Bishop Lucey Park could have considered the leftover blank gables of buildings and left-over spaces that have created a fragmented urban character on Tuckey Street, South Main Street and Grand Parade before spending on a repaving project which may not now have public support. Many additional benefits could have been achieved by a process which was diminished by lack of ambition within the design brief or analysis of the area. This kind of spending and lost opportunity is wasteful of opportunity for Cork and could be avoided if we increase public participation to create a project brief and not only as a failed consultation of presenting a finished design to the Public. It is inconceivable to the Public Concerned that the City Council would not engage to make projects of multi benefit, to avoid the grotesque or one-dimensional solution and seek to create projects of widespread support. Something about public engagement isn't working. Public engagement at the right time could be highly beneficial to achieving a multi benefit in the result of projects. This is the economical and creative approach to successful projects. The Cork City Development Plan should identify the need for consultation in the preparation of design briefs, multi-benefit design and the opportunity it poses for development.

## Protecting the Uniqueness of Cork

Protecting the Unique character of the Historic City of Cork has extensive social and economic benefits for everyone. The role of the Historic City in supporting the economy and in social wellbeing is well documented. This doesn't mean that the Historic City cannot support development. It means that as we recognise the wider potential of the asset of the Historic City of Cork, we need to make policy for how to develop that asset to best use. The question is not whether we invest in new development but how we do so in the context of the character of Cork. The question of good design in an historic context should be addressed further within the Development Plan.

The historic built heritage and natural heritage of Cork is a rare and significant asset of great potential and stands as testament to the past achievements of citizens. Today following years of planning of roads, demolitions, poor architecture, flooding and drainage schemes and neglected maintenance, the once great City of Cork is suffering from dereliction. We have made many mistakes and to effect repair we need creative expertise and a balanced approach to the environment, heritage protection and new design and construction. We can do better to market our City as an advantageous place to be but it requires a rethink of how we protect and present our urban environment in line with the beauty and restraint of our Continental neighbours who have achieved so much success in creating attractive historic city environments. Marketing can only work successfully if there's a really good product behind a campaign. Without this marketing can be viewed as disingenuous and misinformed. We have to live up to what we say about Cork internationally. Protecting Historic Cork and understanding the benefit within the Development Plan should be a central theme for our success and not a marginalised issue.

## The Economic Imperative

Our Historic City has become a location that is not attractive to live in based on the evidence of the decline of the city centre daytime population, and as such is not reaching its potential. When a location is not attractive to investors it means there is no confidence in the market to invest. Confidence has been eroded in the centre of Cork and we haven't reacted in time to create policy to protect those that have invested already or, to attract those that would invest in future. We have allowed our Historic City to become a risky environment for investment and we haven't protected the interests of those that already own property and live centrally. We have failed to protect the authenticity of Historic Cork in conjunction with the promotion of inappropriate investment and perceived improvement in some questionable development that has only led to the dilution of something special and distinctive. A lack of care for the built environment and heritage is greatly contributing to the reduced environment in Cork's Historic Core both in attracting investment and caring for existing value. Economic thinking has become more complex on the issue of investment and growth and the authentic and historic environment has an advantage over new places in attracting investment. The historic city reflects who we are in how we care for it and that reflection can attract or deter an educated workforce to the city.

## Investment in our Historic City

To create an attractive investment environment, we need to protect heritage, promote good design in context and prevent dereliction. We need to present our urban areas as authentic heritage environments using the public realm as a tool for identity and we need to protect the pre 1900s historic centres of Cork in terms of identity to give confidence back to the market.

What we need to show care for is people or the Public Concerned and create certainty for their interests. Our Heritage assets are a significant asset and our Historic City can be liveable and an attractive centre for all of Cork while creating significant economic advantage.

Our attitude to the historic environment has been reckless in the past and needs to change if we are to achieve a successful outcome for everyone. Heritage locations and derelict buildings are a resource for liveability and for homes. We have been devaluing the rare asset that can support us economically and socially; an asset of which we all feel ownership. To manage the issue we need to know how to identify the best advice to create the best policy that will be effective to protect a significant asset. For now in the Development Plan we need to reinforce our commitment to good design in an historic context. Good design for new development is important and insisting on this should not diminish opportunity but to give clarity on the issue and promote opportunity. We need to get advice from the right sources and implement it. On the ground we need to listen to the Public Concerned whose environment has been diminished by lack of successful policy. The Development Plan can begin a change in attitude that may lead to careful analysis of what is going wrong and how we may fix it.

## The Built Environment

### The Origins of Identity. The Urban Design of Cork.

The architecture of Cork City has evolved over time. It is part of the Classical Tradition of Northern Europe with unique characteristics that warrant sensitive care and even exploitation for our benefit socially and economically. Our City thrived and developed, as a place of merchant trade in the Northern European Renaissance period beginning in the 16th Century. Cork is a marine trading port city. The issues of building design, architecture history and development of towns and building traditions, building detail and design theory are not everyday subjects. They have been placed outside our conversations on heritage but they are intrinsically important to what is cultural and worth protecting in the built environment. They are part of an extensive science and study of the history of architecture and design that cannot be ignored in our Development Plan without damaging our potential and limiting our identity. In Cork City the study of the specific nature of what is rare about the built architecture of the urban landscape is ongoing. More discussion about the nature of our built heritage is needed as the very nature of our heritage and related economic and social potential is at risk partly because we do not celebrate what makes our identity and origins unique. There is a perception that if we highlight the rarity or significance of architecture in Cork that it would affect development potential however the opposite is the case and the marginalised deficit in the plan is obvious and seems biased or out of balance when this may not be intended.

## Decline and Decay of Our Greatest Asset

The decay of the centre of Cork has been difficult for the people of the City. In many ways it has been heart-breaking to watch. By damaging the built environment in the 20<sup>th</sup> Century and beyond, we have decreased the financial value of our considerable investment in architecture and urban design over centuries. The decay and destruction of architecture and historic landscapes, accelerated in the second half of the 20<sup>th</sup> Century, has reached new heights in recent times. The environment of Cork which was greatly developed in the 16<sup>th</sup>, 17<sup>th</sup>, 18<sup>th</sup> Century was of singular and beautiful domestic architecture interspersed with well-placed and monumental public buildings. Impressive urban spaces were highlighted by a grand public architecture, church architecture and the storage houses of goods and industry.

The architecture of Cork is not a Georgian style as seen in Dublin. It has its own identity and is more related to the Georgian architecture of the West Country of England in Cornwall or Devon, like in Truro with additional origins in the Netherlands and Normandy. These are all places with which Cork traded. The city includes design traditions that stem from ancient Greece and Renaissance Italy all set in the specific landscape of a beautiful riverine valley. Cork is unique and yet we erode the uniqueness daily to our peril. We have a unique and rare architectural identity that should be coveted and protected and even exploited for our economic and social benefit. Our commitment to the Historic City should be recognised as a central ambition of the Development Plan.



View of the Golden Bend, Herengracht, Amsterdam 1672 Rijksmuseum This canal exists today, largely intact. It reflects the character of our city. Cork still seen on the South Mall and the losses to an environment that could sustain our economy and wellbeing. It reflects a sense of loss that is carried through the generations for what we lost.. We need to reflect on what heritage and an historic city core can mean to Cork.

Imagine 14km of 1.4m high, embankments, walls, walls with gaps and demountables, placed on the edges of the Heerengracht, or on similar urban trading canals in Utrecht, Delft, Bruges, ... , and listen in your mind to the outcry, to the outrage. It is maintained that this is the one and- only possible solution for the flood-protection of the centre of Cork, the "emerging solution" despite realistic and viable alternatives submitted by the Public Concerned and thousands of supporters for an alternative approach. The Development Plan needs to recognise the possibility for change and to face up to the issue.

## Heritage, The Economy and Dereliction

Dereliction is a great concern for Cork City. To thrive economically we need to encourage the authentic regeneration and repair of the Historic City as a central driving force for our ambition for sustainable growth. The brave new world we wish to create and develop, such as in our Dockland area, needs an Historic backdrop, from where cultural and creative thinking may influence and support a sustainable and prosperous City.

*"Over the long term, places with strong, distinctive identities are more likely to prosper than places without them. Every place must identify its strongest, most distinctive features and develop them or run the risk of being all things to all persons and nothing special to any.*

Nobel Prize Laureate Robert Merton Solow

## Dereliction and Decay

To succeed in tackling dereliction, we have to give confidence to the market that we will, protect, their interests, if they invest. Our obsession with large and political development interests is not balanced with a support for smaller or medium investors who can make a significant environmental contribution if they are supported to do so. The deficit in our approach should be corrected to support all kinds of interests from single building investors to the developers of large and complex infrastructure. This one change in attitude would help to alleviate investment. One of our great failures has been in heritage protection which has left an environment that discourages small and medium scale investment in the historic centre because we haven't created an environment to protect or support people's interests. Not only have we not attracted new interests, we have driven long standing interests away and this is a harsh reality for the Public Concerned and a source of shame for the city.

The City Council has sufficient powers to deal with the problems of derelict sites in the city; including the Derelict Site Levy and the option to carry out necessary work and charge the owner, and/or to acquire the site. The Cork City Derelict Site Register at the end of September 2021 listed 84 derelict sites in the city, some entering the register in the 1990s and early 2000s.

Heritage protection is not a marginal consideration in the armoury of regeneration and economic prosperity. It is central to our recovery and wellbeing and that role needs to be taken seriously in the Development Plan and not marginalised or part of tokenistic addendum.

## Creating Architecture Policy

Cork City would greatly benefit from policy to represent architecture in the historic environment. By giving identity to the Historic urban environment and showing how to care for it and develop within it we can solve many more difficult issues that we face. Architecture policy can identify design opportunity and outline ambitions for sustainable development such as the design of offices that would convert to housing and not require demolition at the end of a short lifespan. Our Development Plan has a central role to play to create confidence and parity but also in creating future opportunities within an uncertain future for Cork. Policy for good design, future opportunity and sustainable reuse can secure our future and is the concern of the Public Concerned.

## Ambitions for Built Heritage Protection

### Revitalisation Action for Cork's Historic Centre

The historic centre has been regarded for decades economically, as a shopping destination only and this has in part led to a decline. A change is required and it's a creative change. Creative forces revive cities. Ideas for change need to have a multi benefit effect in that everyone with an interest in the Historic City needs to be represented and benefit from changes. Development should enhance and not degrade the Historic City or the interests of the existing Public or Public Concerned.

The Development Plan can highlight opportunities for revitalisation leading to social and economic benefit. Of primary importance is how to support families to live in the Historic City and invest in derelict or at-risk historic homes and buildings. Maintaining a liveable environment that is not a through route, but a place with its own identity and neighbourhood population is another challenge to be recognised by The Development Plan. With a liveable environment and a focus on promoting owner occupiers we can alter the dwindling prospects of our Historic City especially. Crucially those living and investing in the Historic Centre become the consistent and sustainable customers for local business.

Investors should be promoted in creative ways to risk using their own capital, to protect heritage buildings and create a vital, liveable historic environment. Policy should encourage new investors in and support their needs as we would design for the needs of those in any new housing development. Shared surface streets, larger footpaths, reduced noise pollution, parking provisions for residents, reduction of through traffic, connectivity etc. Everything we can do we should do to promote reinvestment in city homes with as much clarity of purpose that we put into new housing developments. The environment of our streets are our neighbourhoods can only be attractive if a reasonable standard of life can be achieved as is achieved by our European neighbours in historic centres.

The city centre is a shared destination for the wider city and a neighbourhood for those that live there. The two functions are compatible. It should not be degraded in performing as a through route for traffic. Support for investors means removing uncertainty in the environment and solving problems that exist. The idea of the city centre as a destination for the weekend only, often formed in the period after the 1970s has a hugely damaging effect on the creation of a sustainable population and neighbourhood and needs great commitment to create an effective reversal of policy that would effect a change. If we could achieve a revitalisation of the Historic City and attract resident investors it would act as a compliment to our ambitions for the Docklands. Simply put we could attract capital by reflecting the needs of housing design policy in the historic environment and by solving big problems simply (like developing an

alternative to wheely bins with a private supplier). The Development Plan should identify the issue and the need to act. There are far more creative ways to attract investment than repaving streets.

## Roads Streets Quaysides and Residents

Cork City has quays, streets, and public spaces. These places were designed for shared use. Road design tends dominate the urban environment of the Historic City currently where we see lines, sticks and signage that relates to the design of Roads and Routes and not urban spaces and streets. We must reverse this policy. Access to the Historic Town Centre should be eventually for services, residents' vehicles and incidental traffic only. The environment should be bicycle and pedestrian orientated. It should be inclusive for those that cycle, walk, or roll. Shared surfaces should dominate in the Historic City.

Road / Traffic design convention needs to be reduced in influence and the shared surfaces of our housing manuals and design guidance (DMURS) need to be implemented sensibly and with regard to the historic environment in the Historic City. The design of streets should be flexible and safe and concerned with the environment of shared use with access traffic at 30km/h maximum. The spaces should be designated as neighbourhood access and shared amenity for the wider city and business not as roads. In Continental Europe this often means streets cobbled entirely, supporting parking, markets, access and promenading with only low impact marking on the streetscape, painted to be removable to respond to future and flexible need. We are overdesigning the function of our spaces and limiting our future while designating our public realm as a series of ever diminishing projects. We are creating uncertainty and lack of flexibility believing we know the needs of the future to be inflexible and fully reflect our time. We should be pursuing a flexible and long-term approach, maintaining the identity of the city and helping to attract investment.

We can reverse the damage caused by roads and give back space in front of houses to make investment attractive. Reduced traffic lanes are compatible with facilitating services like green areas, parking and amenity to attract families and investors in historic buildings. Families have cars and some will need cars. It will be a long before our dependence on cars diminishes, although city centre living and the increased opportunity from the sharing economy, reduces their number and use over the out-of-town housing scheme. A space in front of a derelict house is another reason a family can invest. There is a misunderstanding and hypocrisy in providing play areas, green spaces, spaces for parking and improved environments in new homes and expecting difficult buildings in the city centre to be occupied and maintained by residents without significant environmental alteration and consideration. Issues such as noise and antisocial behaviour hamper the prospect of a liveable city. We can learn from our Northern European partners like Amsterdam which is very similar to Cork in its origins as a city of houses and not apartments and still maintains a strong resident base in the Historic City.



Amsterdam liveable city shared streets, connection to water and rigorous support for residents and historic investors.

In Amsterdam streets for housing protection have shared surfaces, a limited speed limit in residential areas, play areas, green spaces and residents parking protected. The canals form a large part of the amenity to attract and keep investment and maintenance in the Historic City.

The promotion of cycle lanes for commuting and good public transport services is central to eventually creating a liveable neighbourhood in the city centre as well as the outer centres of population. The mark of a successful city is a city where the wealthy use public transport. We are not there yet and may never be due to our scale, but we can aspire to fewer journeys and a reduction in the impact of traffic lanes and even bicycle lanes in the Historic City in favour of shared spaces and this is compatible with attracting new investors to maintain the architecture and contribute to the social life of the city. The issues are widely misunderstood as demonstrated by the design of streets as roads and a change required can be highlighted by the Development Plan in more than just terms that are so general, they may change little.

Cork requires ambition and should stress the importance of a liveable city for all residents. Cork should look to become the first Irish UNICEF- designated Child Friendly City. (see sources of information)



View from The Mardyke Walk, 1806, Crawford Gallery Collection

## A Voice in the Future of Where We Live

Part of the requirement of the Aarhus Convention is to provide people with a meaningful voice in the future of where they live. Many thousands of submissions have been made within statutory development process expressing an opinion on flood defence for Cork to OPW, City Council and An Bord Pleanála. The Draft Development plan does not yet recognise the opinions of people on flood defence and heritage in Cork. The Public and the Public Concerned are being loudly ignored. The omission is so obvious that it raises questions of seeming lack of competence and impartiality in the process. The omission undoubtedly undermines confidence in the city and in the Development Plan process and reflects an unnecessary failure in local democracy and leadership in the city. It is hoped that the omission is not permanent and that the interests of the Public Concerned are recognised beyond an impasse that is almost without precedent in modern times and yet the impasse defines a gaping omission of policy in the Development Plan. A door needs to be opened that expresses compromise on the issue. Representation for such a large and unprecedented Public Concerned group cannot merely wait for a change of leadership for empathy. The Development Plan is central to a change of options.

## Flood Defence & the Development Plan

The City has a flooding issue. What would it mean to us financially and in terms of investment to protect our city from flooding using infrastructure that protected the entire city? Is there a multi-benefit to widespread flood protection outside our Historic Centre in terms of the economy, property value and investment? What is the threat from the sea level rising in real human terms? If we build flood walls and

a drainage scheme through our city do, we get the protection we need or do we get stuck with a bad solution which is an impediment to attracting investment, tourism or regeneration? The City has not yet answered the questions but the Development plan should be posing them. This submission is a request to do so.

Can we offset the damage caused by a proposal for a drainage led flood scheme for Cork over the last 15 years by discussing what should be policy now and finding a way forward? Creating ambition that could support a better approach is not impossible and if we don't, we are leaving a vast hole in the toolbox of revitalisation of our Historic City. We have decided to reduce the amount of flood water by reducing the effect of rainwater. This is already policy for the Docklands. New policy on the issue will question the current flood walls approach for the Historic Centre and offers viable alternatives and it should be okay to discuss the ambition in our City Development Plan according to European Convention.

We need to state our preference for designed intervention of infrastructure that protects our Heritage City following the standards we have set for the protection of Historic Architecture through the designation of Protected Structures and Conservation areas within the planning system. In cases of design intervention in the Historic City we need to recognise that design is a specialised subject within the historic environment and a specialist design approach is required for flood defence infrastructure if we are to protect our economy by the avoidance of inconsiderate, failing or grotesque proposals.

## Protecting the Rights of the Public Concerned

We need to identify the positive and negative aspects of proposals so that as in all development we don't injure people or the value of their investments by injuring their environment. We need to do this to guarantee certainty to those who would invest in difficult environments that their interests will be protected. Many decisions for the environment of the city including the use of local flood defence infrastructure on the banks of the Lee devalue the lifetime investments of thousands of people and are not supported by the Public Concerned. We need to say: "Invest in our Historic City, we will protect your interests."

## Risking the Social Buzz Needed to Harness Creative Human Capital

It is now widely accepted in academic literature on urban and regional development and planning, that cities are the engines of economic growth. The idea that new technologies have diminished the importance of location for business is not supported by the evidence. More critically, in knowledge economies and societies Michael Porter of Harvard University, stresses the importance of location for economic development through business development and said that "*the enduring competitive advantages in a global economy lie increasingly in local things—knowledge, relationships, motivation—that distant rivals cannot match*"<sup>1</sup>.

One of the key sources of advantage for cities is the quality of its human capital. This refers to the skills, abilities, education, and creativity of the people living in a location that are available to businesses.

---

<sup>1</sup> PORTER, M. 1998. Clusters and the new economics of competition. *Harvard business review*, 76, 77-90

Elizabeth Currid of the University of Southern California argues that "regions and cities have new roles in the rise of knowledge and innovation-intensive industry clusters through cultivating places and environments that are more conducive to innovation and offer the amenity-rich and open environments that people and knowledge-intensive firms thrive in" <sup>2</sup>.

A great risk to Cork is that the proposed riverside flood defences undermine the attractiveness of the city for social engagement and that the centre of the city becomes merely a location that workers commute to in the mornings, without any neighbourhood or social buzz that is important for creative life; often found in historic cities that are cared for and have unique and culturally rich environments. Richard Florida of Rotman is a leading international authority on urban planning and growth and has stressed the importance of highly innovative workers as a source of economic growth. He refers to these as the '*creative class*'. This creative class includes "*people in science and engineering, architecture and design, education, arts, music and entertainment whose economic function is to create new ideas, new technology, and new creative content*" <sup>3</sup>. These workers are increasingly important in innovation or knowledge economies and societies. There is substantial evidence of an association between a city's economic growth and its share of creative class who often prefer to live in an historic centre. The implications for cities in an increasingly competitive, globalised, and knowledge-driven world, is that they must accommodate and attract these workers to succeed. The economist Robert Merton Solow highlights the value of protecting the distinctive identity of cities which are more likely to prosper.

An important consideration for innovative, creative people is the availability of amenities and an attractive lifestyle. Richard Florida suggests that it is no longer the case for creative workers that they will go to where the jobs/factories are. Creative workers increasingly work with intellectual products and their migration to urban areas where creative work is available is more due to the attraction of the environment, leisure life and community rather than actual work. Ed Glaeser of Harvard University in his recent book, *The Triumph of Cities*, says that "*the bottom-up nature of urban innovation suggests that the best economic development strategy may be to attract smart people and get out of their way*". <sup>4</sup>

The creative individuals who migrate to attractive urban settings are attracted by a street level culture that may include a "*teeming blend of cafes, sidewalk musicians, and small galleries and bistros, where it is hard to draw the line between participant and observer, or between creativity and its creators*". <sup>5</sup> This fits well with the ideas of the leading urban planning thinker, the late Jane Jacobs, who stressed the importance of cities' diversity as the main source of dynamism and strength. She emphasised the critical role of public spaces, amenities, and footpaths for a city's success, dedicating an entire chapter in her seminal book to the "*intricate sidewalk ballet*" that marks successful cities. <sup>6</sup>

Irena Bokova the Director General of UNESCO has stated that '*Tangible and intangible heritage are sources of social cohesion, factors of diversity and drivers of creativity, innovation and urban regeneration - we must do more to harness this power.*' while the World Bank connects economic advantage with historic cities that protect their historic core:

---

<sup>2</sup> CURRID, E. 2007. *The Warhol economy: How fashion, art, and music drive New York City*, Princeton University Press Page 162

<sup>3</sup> Why the Creative Class is Taking Over the World, Business Insider July 2012

<sup>4</sup> Book Review: *Triumph of the City: How Our Greatest Invention Makes Us Richer, Smarter, Greener, Healthier, and Happier*, International Downtown Association

<sup>5</sup> FLORIDA, R. L. 2002. *The rise of the creative class: and how it's transforming work, leisure, community and everyday life*, Basic books Page 166

<sup>6</sup> The Death of Life of a Sidewalk Ballet, Governing, August 2014

*“A conserved historic core can differentiate that place from competing locations – branding it nationally and internationally, thus helping to attract investment and talented people.”*

from 'Economics of Uniqueness: Investing in Historic City Cores and Cultural Heritage Assets

No one quality provides a silver bullet for urban economic growth. Research clearly shows there is still a place for combined strategies, such as urban environment investment, educational investment, enhancing workforce skills, encouraging new business and expanding existing industries. It is not possible for cities to simply replicate and transplant the strategies of other successful cities without an awareness of their own identity and specific assets such as character, location or an educated population. A successful strategy for Cork must consider the specific historical, cultural, geographic, and institutional context. However, it would be foolhardy for Cork to ignore the wealth of evidence on the importance of its specific origins, historic urban identity, environment of the river, social amenities and spaces for interaction as an important factor in the attraction of creative talent and economic value and growth.

## Cultural Sector and Heritage Tourism

No one quality provides a silver bullet for urban economic growth. Research clearly shows there is still a place for combined strategies, such as urban environment investment, educational investment, enhancing workforce skills, encouraging new business and expanding existing industries. It is not possible for cities to simply replicate and transplant the strategies of other successful cities without an awareness of their own identity and specific assets such as character, location or an educated population. A successful strategy for Cork must consider the specific historical, cultural, geographic, and institutional context. However, it would be foolhardy for Cork to ignore the wealth of evidence on the importance of its specific origins, historic urban identity, environment of the river, social amenities and spaces for interaction as an important factor in the attraction of creative talent and economic value and growth.

## Cultural Sector and Heritage Tourism

In Limerick 2030, a challenge for the city is that it *“does not fully engage the river, a legacy of the industrial and trading character of the Waterfront and more recent developments, and the introduction of elements of the orbital road system”*.<sup>7</sup> Limerick, in its new economic and spatial plan identifies as a key element that the city must *“make more of the river”*. Cork risks turning its back on the river, as a source of identity, creative inspiration, amenity, and of social interaction.

It can be difficult to evaluate the effect on cultural and heritage tourism of flood prevention structures along the quays of Cork, though emerging amenity, maritime and river-based tourism projects would be adversely affected by what is proposed. Examples of other European cities engaging with their rivers and canals like Amsterdam, Bruges or Copenhagen demonstrate the benefit of the care of authentic, historic built environment in the life of the city. Cork City Council currently recognises the river as an important heritage asset stating that *“the city’s relationship with the River is significant in shaping the*

---

<sup>7</sup> Limerick 2030 An economic and spatial plan

*development of the city through providing a medium for transport, communication, defence, commerce, biodiversity and recreation".<sup>8</sup>* A flood walls scheme would undoubtedly affect the setting of the river by its nature. Providing uncertainty of outcome as well as environmental degrading could greatly affect the viability and value of property and investments along the course of the river and historic city generally as well as effecting the city's potential to attract investment and talented or creative people.

## A Tidal Barrier and Upstream Flood Defence Scheme

### The Economic Potential for Cork

Remote flood defence could allow Cork to move forward economically with a certainty of outcome which would be beneficial for land and investment values and for development potential. This could be highly significant in securing an authentic experience in the Historic City and a desirable development opportunity in the Docklands area and other flood prone locations that will suffer increasing tidal flooding in future as sea level rise continues. It is unhelpful for the Development Plan to deny the issue of tidal flooding and mislead the Public and the Public Concerned. The lack of engagement on the issue of flood defence with the Public Concerned raises the issue of seeming bias in the system.

### Direct and Indirect Costs of Flood Defence

The economic costs associated with the flood relief proposals can be categorised as direct and indirect. Direct costs include the costs of construction and maintenance.

Indirect costs include the loss of revenue to businesses from disruption during construction (this may also include lost income for employees if employment falls in affected businesses), the impact on businesses, particularly cultural and tourism, (from adverse features of the flood defences), the impact on businesses generally from loss of amenities and its effect on Cork as a location for attracting innovative people and new commerce.

The proposed benefits of the flood relief programme is the reduction in disruption and costs from flooding in the City Centre. From an economic perspective, the important consideration is not the absolute costs and benefits of the proposed flood relief programme or alternatives, but the incremental or marginal costs and benefits from each alternative. For example, the decision should be based on the benefits from the best alternative relative to the benefits from the next best alternative, and the costs must also be considered on a marginal basis.

The tidal barrier and upstream measures proposals do not incur many of the indirect costs associated with the flood walls and pump chambers proposal, specifically in relation to the costs of disruption and longer-term loss of amenities. The case for the loss of amenity and potential to develop more of the city safely is clear. The flood walls scheme seems to not benefit the city through loss of tourism amenity, inability to protect the city from rising sea levels and a limited area of protection. There are also issues of long-term policy on slowing the flow of rivers and protecting the value of investments in the city to consider. If successful the flood walls proposal would protect the centre of Cork from flooding though it is argued that it would not and there is some concern on the issue.

---

<sup>8</sup> <http://www.corkcity.ie/services/strategicplanningeconomicdevelopment/heritagesection/culturalheritage/>

The status quo costs also need to be considered. The costs of flooding are concentrated on some citizens and businesses, though the costs of construction and maintenance (and indirect costs) would be borne by everyone in the city (and county). An alternative to construction is the provision or funding of flood insurance by the state, where private insurers are unwilling to due to the fact that long distances of flood walls don't reduce flooding risk for them.

It is not possible to comment on each of the relative direct costs and benefits of each proposal. There are valid concerns raised about the OPW costs estimate for a tidal barrier. An estimation of the costs of disruption to businesses in the city from the installation of pump chambers and flood walls is also very difficult to formulate without carrying out detailed surveys and getting information on businesses turnover and other financial detail. It should be noted though that the disruption from construction would be significantly less with a tidal barrier led remote solution and that damage to the local economy could be significant.

*“The alternative scheme has the major benefit of not requiring the construction of walls along the quays in the city, thus helping to maintain the historic landscape of the city and avoiding the disruption that the construction of walls would cause. The alternative scheme would also avoid the scenario of overtopping or failure of flood walls in the city, which would cause a serious risk to life as well as damages to the city.”*

5.3 Conclusions, HR Wallingford Cork City Tidal Barrier Cost Estimate

## Climate Change Ready

Cork City can manage the threat to the city by fluvial flooding by ingenious consideration of areas of new development including application of sustainable urban drainage systems however the city is not Climate Change protected and is highly vulnerable to a Sea Level Rise threat which could overtop the limited area LLFRS / OPW Walls by 2040 and threaten other areas before that.

## Removing Uncertainty from the Equation

Uncertainty in any market can have significant negative effect on growth potential. It is argued that the LLFRS Flood scheme has created development uncertainty for over fifteen years and will continue to do so. It may not be the creative solution to flooding in Cork and may not attract a creative workforce or tourist visitors. The case has been presented relating to possible failure of flood wall technology, complications relating to ground water issues, building subsidence and continued disturbance during flood events relating to movement of people and traffic between extensive flood barriers.

There is a valid fear that uncertainty may dissuade developers from an interest in the city either the Historic Core or Dockland area for different reasons. Just the decision to achieve a remote flood

defence plan could remove this uncertainty overnight and this could be greatly beneficial to the city economically. The refusal of the city to consider the possibilities for remote flood defence openly and outside the recommendations of interested parties places the entire process of consultation and development potential in question while continuing to raise the question of seeming bias in the authority acting to implement the Planning Process on a statutory basis. The Development Plan could remove uncertainty on the issue by opening the door to future possibilities without bias.

## How a Plan Affects an Economic Opportunity

A plan for flood defence for Cork has been made since 2014 based on flood walls placed locally along the banks of the river. The LL (Cork City) DS (Lower Lee (Cork City) Drainage Scheme). The polarisation of the argument around the suitability of flood defence proposals for Cork effects the development potential of the city as presented in the Development Plan. Public discussion has been limited and information from the City Council doesn't reflect the truth of the intervention proposed. Recently the Council stated that the real issue with Docklands is from rainfall flooding and not tidal flooding. It's difficult to know what this means but it is true that such ill-informed statements misinform and manipulate the Public Concerned. Opinion on the suitability of the project does not come from The Public Concerned or advising economists or environmentalists but from those who would gain from the project and this raises the issue of an authority seeming to be biased in the Planning System. The issue has not been discussed or represented independently. There is a widespread perception of spin misinforming the Public and the Public Concerned on the merits of the scheme. This potentially affects the legitimacy of process of consultation and of the Development Plan itself. There is no doubt but that the existence of the plans for flood barriers on the banks of the Lee and the resistance to them causes uncertainty in the environment of investment and development and significantly effects the economic fortunes of the city. It is also true that the possibility of 15 km of flood defences, pumps, maintenance burden, building subsidence, city centre construction, reduced safety etc effect the city by way of increasing uncertainty which discourages investment, reduces the value of current investment and has led to dereliction. The implementation of a project based on the Arterial Drainage Act process represents a downward spiral in environmental and economic value for everyone that owns property largely due to the limited consideration of the design and resultant grotesque nature of the proposal. While the use of localised flood defences may be appropriate at a low level of public expenditure and impact the €200m plus scheme now requires a rethink due to valid concerns.

## Docklands Potential for Cork

The Lower Lee Flood Relief Scheme (LLFRS) doesn't propose flood protection for the Docklands, an area of 179ha of development potential. It contains the investment opportunity of many including the predicted creation of over 33,000 jobs and in addition to the Historic Centre Docklands needs tidal flood protection due to sea level rise. By opening the door to conversation on the issue within our Development Plan. We can create an economic upturn for Cork by merely opening up the possibilities for the future. Those who are informed about the OPW plan for flood walls in Cork are fearful of the value of their current building investments behind flood walls and the potential for viable development in a city largely without flood protection from the sea, especially the Dockland area. instead of the

downturn of the OPW project which is based on division and can only be pursued against the will of many thousands of Public Concerned. We need to find a better plan particularly as our attractiveness as a place and prospects for the future have been reduced by a wider issue of dereliction and a reduced environment within the Historic City caused by uncertainty which includes the threat of the OPW Flood Walls. It's time for a rethink. The Cork City Flood Risk Assessment Report needs to address the lack of protection from tidal flooding in the city and the potential economic gain that more widespread protection may give in the future. Without doing this the document has no public mandate and demonstrates a contempt for the Public Concerned that seems to be present in the local authority leadership.

## Financing A Tidal Barrier for Cork

A tidal Barrier, like a road or building project, can be financed by Public Private Partnership as public infrastructure. Capital investment firms now exist that specialise in investing, building and managing greenfield infrastructure. The most suitable arrangement is a Design Build Finance Operate and Maintain form of agreement (DBFOM). See Appendix I. The decision to pursue flood defence for the city that is remote and would protect far more of the city would create an instant economic and development advantage for Cork. A PPP arrangement could contract a design, build and manage contract with set goals of implementation. The change in approach for Cork could help to develop an approach to infrastructure relating to Climate Change nationally. It has been noted by the European Commission that Ireland has a fractured approach to water policy that defies the Water Framework Directive. Finding an integrated approach to infrastructure could assist in changing this deficit. See Appendix I

## Portable and Temporary Flood Defence

Until we have widespread and remote flood defence we will need temporary flood protection for the city centre, to protect property and business in times of tidal surge. Temporary flood defences and portable defences and pumps should be employed now to help manage the flooding that may occur from the river's edge and / or from underground. Temporary defences are in widespread use across Europe and the city is responsible to protect people with temporary flood defences. It is part of court record that if defences are built in Morrisons Island flooding would be increased in the areas surrounding the construction. In all future case scenarios other than possibly a Tidal Barrier, temporary and portable flood defences will be needed. It could be considered negligent or biased of civil service that they have not been used better and sooner. A commitment to various forms of flood protection including portable and temporary defences should be recognised in the Development Plan.

## Subsidence, Damage to Property, Liability and Failure

Cork people don't want to see cracking in the façades of buildings in the city because they haven't had informed and reasonable discussion on groundwater issues. There are no designs on how demountables would cross bridges or how safe demountables are or how likely the flood walls scheme

is to fail. Demountables are ten times more likely to fail than fixed defences. Simple independent answers to legitimate concerns such as safety are required without spin or bogus argument. There are few genuine answers to legitimate concerns. Save Cork City continue to research and continue to seek a reasonable and fair discussion on the future of the historic city, wellbeing and development potential relating to flood defence. The Development Plan should commit to protecting property in the Historic City that may suffer from issues relating to subsidence and ground water alteration in the LLFRS. The City Council are aware of the concerns relating to flood defences and ground water and should not legitimately be accused of concealing them should the issue become related to proposed flood defences. In the case of refusal to consider the issue, liability may justifiably be with the City Council and claims could be extensive and ongoing for decades.

*"A further Complication is that confinement of groundwater, owing to the proposed cut- off measures around the City Island, may also result in a reduction in groundwater quality in the gravel, which has been classified as a regionally important aquifer. In summary cut-off walls and a groundwater dewatering system at Cork is an experiment in separating two interdependent surface water and groundwater systems, which is likely to fail."*

Anthony Beese Phd PGeo ComplEI Ground and Groundwater Conditions at Cork Implications for the LLFRS

## Accountability for Cork City Council

Of central concern for all of Cork is that there seems to be little accountability in a system where we could build flood walls, spend money damaging our city and there would be no accountability to Cork citizens or The Public Concerned from the designers for loss of income or investment value due to the nature of the project. "An experiment likely to fail" is how the design has been described by expert opinion.

In question is the safety of OPW flood defence proposals, the issue of tampering with ground water in the city, ongoing construction in the city centre, the cost of the project and the effect on our society and economy. There have been few fair answers to a basic well published list of concerns. Extensive liability for subsidence issues could lie with the City Council particularly as open discussion and independent assessment may be seen to be hampered by city authorities in their response to the issue. What is reflected on the issue in the Development Plan provides the future evidence of the liability of the City Council for problems causing lack of value of assets or lack of income relating to defects in the LLFRS.

## Flooding in Cork

Cork City flooding is

1. Pluvial: Downpours in excess of the capacity of drainage gullies and channels
2. Fluvial: water flow over the Waterworks Weir greater than 350 cubic metres per second,
3. Tidal: spring tides with surge overtopping the open quays.
4. Groundwater: the water table rises above the level of the ground.

In the design of flood walls there has been no study groundwater flooding in the Central Island and adjacent low-lying areas. Reports do not contain a single groundwater-level measurement over time at any point on the Central Island or in the urban polder containing the Docklands Development. Measurement is the beginning of understanding. If we can acknowledge that there is an issue with the proposals for flood defence in Cork then we need to address the issue in the Development Plan. If we refuse to acknowledge the issue the City runs the risk of accepting liability for the problems that may occur in the future and liability for the effect of the proposals and their consequences. See Appendix II

## Safety and Management of Flood Defence

Under the LLFRS Cork City Council must manage over a kilometre of demountable barriers in the city that were designed by others who may be unaccountable to the City. The Flood Walls scheme is unsafe relating to length of defences, character of demountables and design speed of 550m<sup>3</sup>/s of flood water up from only 150m<sup>3</sup>/s in 2009. No open discussion has been had on safety issues or management concerns. As a city we must be mindful of the hurt and scandal this kind of negligence would cause to future generations and our liability to citizens if the scheme fails which statistics tell us it would due to the reliance on demountables, flood walls and pumps all greatly increasing the chance of failure and the reason there is nor reduced risk of failure provided for insurance companies by the proposals. The Development Plan should reflect the reality of the proposals or suffer negligent liability for future failures and safety issues.

## Bogus Argument

There are no circumstances, ever, that would give a city a maintenance issue on both a flood walls scheme and a tidal barrier and pay for both needlessly. A tidal barrier fundamentally protects the Historic City and doesn't damage it by reducing water levels in the city. It negates the use of and reliance upon 15km of flood defences and pumps if they were to work. In the Development Plan Process we have seen a promotion of the flood walls scheme above an options-based approach which would reflect public opinion and the requirements of local participation in decision making. The city has been made aware of the shortcoming of the scheme and without addressing them the Development Plan becomes the reference document to prove the liability of Cork City Council for damages.

## Morrison's Island

By proposing flood works to Morrison's Island we are maintaining the LLFRS as a live project for Cork and maintaining a threat to development potential. This approach is damaging the potential of the city for investment and maintains an unfair conflict with the Public and Public Concerned. No space in the city displays more intact Heritage Architecture and setting ready for exploitation for social and economic benefit than the South Quays of Georges Quays and Fr Matthew Quay. The area is the Nyhavn of our City and one of our greatest assets. We need to protect it and repair it and present it in a way that protects our origins as a maritime trading city. The 900mm high concrete flood walls and additional

railing and demountables proposals for the Parliament Bridge area are in design terms grotesque and unnecessary to protect the city from flooding. They are certainly unnecessary in their brutality borne from a singular mindset without balanced consideration of the true nature of the place or the needs of the people of the city. Any alteration to or addition to quay walls for possible benefit of flood protection should not be achieved like this. The character of ground source flooding should be recognised in Cork and the nature and potential of the historic quays and in particular the South Quays area should be recognised in the Development Plan to avoid a negligent response. See Appendix II and III Statements.

## Comment on Strategy Objectives Cork City Development Plan

It is not possible to comment on the entire written Draft Development Plan. The documents could be more specific on what they wish to achieve and use language that is more relevant, specific and respectful to the many professions and studies that make up an industry around development and the environment. The plan is long on soundbite and short on substantive comment. It suggests that policy is not decided locally or as part of a process of public consultation or by influence of the elected members of the City Council. The document does not state objectives clearly enough though it is recognised that it is a draft plan. It has been suggested that it reads as a filibuster delaying the process of decisions being made. For limited example here are some comments on the Strategic Objectives of the Plan.

### SO 1: Compact Liveable Growth

Deliver compact growth that achieves a sustainable 15-minute city of scale providing integrated communities and walkable neighbourhoods, dockland and brownfield regeneration, infill development and strategic greenfield expansion adjacent to existing city.

Comment: SO1 should note the protection of the character of the historic city.

### 2.7 Long Term Planning

To support a longer-term strategic planning approach to help safeguard strategically important lands necessary to deliver future compact growth in Cork City in line with the NPF 2040.

Comment: 2.7 should aspire to capitalise on and protect the unique characteristics of the historic city and landscapes as an amenity and a series of neighbourhoods

### 2.11 Design-Led City

Follow a design-led approach that delivers sustainable, high quality placemaking. Development shall contribute positively to the quality of the surrounding built and natural environment and shall be planned and designed with reference to climate change mitigation and adaptation.

Comment: 2.11 could add placemaking, urban regeneration and high quality architecture in context. The objective should read: "Committed to action on climate change, development shall contribute positively....".

## 2.23 Quality of Life

In planning for future population growth, Cork City Council will assess and monitor quality of life factors including improvements in the urban environment, community infrastructure and cultural experiences that can increase the numbers of people seeking to live, work, study, visit and experience the city.

Comment: 2.23 We could say that the City Council will improve the attractiveness of the urban, historic environment to attract increased investment and a talented workforce to the city. Many statements in the plan seem to not get to the point.

## 2.14 Neighbourhood Mix

Promote high quality neighbourhoods by increasing the range of community, recreational, local enterprise, cultural and leisure related facilities.

Comment: 2.14 should add the enhancement of services for the protection of and renewal of city centre urban environment to support existing communities.

## SO 2: Delivering Homes and Communities

Provide densities that create liveable, integrated communities by using a mix of house types, tenures and sizes linked to active and public transport. Provide amenities, services and community and cultural uses to enable inclusive, diverse and culturally rich neighbourhoods.

Comment: SO2 could consider adding the protection of existing communities and support for renewal by providing services and amenities for historic communities and for new development

## SO 3: Transport and Mobility

Integrate land-use and transportation planning to increase active travel (walking and cycling) and public transport usage. Enable the key transport projects in the Cork Metropolitan Area Transport Strategy (CMATS) delivering multi-modal usage and smart mobility, accessible for all.

Comment: SO3 could note the advantage of reducing journey by allowing employment to be placed in residential areas and replanning to eliminate the need for journeys. Support and development not enabling could be offered for the CMATS objectives which are in part out of date. The plan should indicate not just how it will increase active travel but how it will disincentivise private car travel. An ambitious target of creating the first car-limited city would create substantial positive international coverage for Cork city. For examples of how to inconvenience car use relative to active and public transport see cities such as Groningen which has extensive public transport.

## SO 4: Climate and Environment

Transition to a low-carbon, climate-resilient and environmentally sustainable future. Implement

climate mitigation and adaptation measures that reduce our carbon footprint including sustainable energy consumption, sustainable transport, circular economy, green construction and flood risk mitigate and adaptation.

Comment: SO4 terms such as "*climate mitigation and adaptation measures that reduce our carbon footprint*" limit our responsibility and response by focussing on carbon footprint only relating to climate change. As Greta Thunberg says: "All we hear is blah, blah blah." The plan requires clear, specific, and timely targets. This will then require action, such as those on commuting. What the city do for global climate justice in its procurement policies and in what aspects of economic development – such as international tourism – will difficult decisions be made?

## SO 5: Green & Blue Infrastructure, Open Space and Biodiversity

Manage and enhance green and blue infrastructure, to protect and promote biodiversity, ecology and habitat connectivity, protect natural areas, enhance landscape character and maritime heritage, and manage access to green and blue spaces that provide recreation, amenity and natural areas.

Comment: SO5 could add the term *historic* landscape character to replace landscape character to reflect the benefit of setting and landscape and the historic nature of all existing built landscapes.

## SO 6: Economy and Employment

Be a national and regional economic driver delivering strong, resilient, diverse and innovative economic growth. Focus new employment in strategic areas across the city. Enhance Cork's role as a city of learning, using knowledge and talent as a key enabler for city and economic growth.

Comment: SO6 could mention *creative* talent and not just talent as an enabler of growth. Reference could be made to the World Bank statement that links heritage and historic city cores with economic prosperity. This objective requires attracting creative workers and demonstrates the interdependence of the objectives, as these workers demand child-friendly, historically rich, culturally diverse, and clean locations. The plan does not reflect the new reality of large scale remote working, and how we attract workers in sectors that can live in Cork while working internationally. A small proportion of these workers would transform our economy.

## SO 7: Heritage, Tourism and Arts

Protect and enhance the unique character and built fabric of the city its neighbourhoods, urban towns and settlements by caring for Protected Structures, archaeological monuments and heritage, Architectural Conservation Areas and intangible heritage. Identify, protect, enhance and grow Cork's unique cultural heritage and expression in an authentic and meaningful way. Ensure Cork's heritage, culture and arts are celebrated and developed to create an attractive, vibrant and inclusive place to live, work, study and visit.

Comment: SO7 could include the protection of the services and environment of historic areas to promote regeneration and protect existing fragile neighbourhoods & develop policy on Architecture and design for the historic centre including the care of historic buildings to capitalise on the unique identity of the city as demonstrated by the City of Copenhagen.

## SO 8: Environmental Infrastructure Awareness

Ensure efficient and sustainable use of water services, enhance water quality and resource management. Manage waste generation and treatment and support the principles of the circular economy. Improve air quality and promote pro-active management of noise. Enable the sustainable delivery of digital infrastructure, renewable energy and environmental improvements.

Comment: SO8 could include policy to reduce commuting travel needs for work schooling etc. meaning a policy of less infrastructure or no need for more infrastructure. If we are organised.

## SO 9: Placemaking and Managing Development

Develop a compact liveable city based on attractive, diverse and accessible urban spaces and places. Focus on enhancing walkable neighbourhoods that promote healthy living, wellbeing and active lifestyles, where placemaking is at the heart. Follow a design-led approach with innovative architecture, landscape and urban design that respects the character of the city and neighbourhoods

Comment: SO 9 could consider adding the protection of existing fragile communities, capitalising on Unique Character of Cork by protecting uniqueness and maintaining identity of Historic City and Medieval City.

## Conservation Areas

At a minimum Conservation Areas presented in the Draft Development Plan should have an overall map for readability and assessment of the protected areas in the context of the whole city.

The Plan should recognise the historic importance of the riverside landscape and the South Docks landscape and maritime and trading history of the city. The origins of the architectural character in the traditions of Northern Europe and the context of the Northern Renaissance.

### Medieval City Identity

Connect North Main Street and South Main Street to create a Medieval City identity

## Routes

Mapped objectives Routes and Walkways should include changes to routes within the city and recognise the route from Kent Station to Custom House Quay to Oliver Plunkett Street, Tuckey Street and to Wandsford Quay. This route could greatly support commerce in the city centre. Riverside routes should be reviewed to include a route over Parliament Bridge to Sullivans Quay and the Cathedral while linking with the Event Centre Site with viewing towards the Medieval City. The North River route should link to the South River Route from Grenville Place to Wandsford Quay.

End.



# Appendix I

## Pevensie Coastal Defence Ltd Finance and Build The PFI / PPP concept (Public Private Partnership)

PFI was launched in 1992 as UK Government policy designed to increase the involvement of the private sector in the provision of public services. Other policies with a similar aim were already in existence, namely Public Private Partnerships (PPP), privatisation and contracting out. It may be argued that PPPs offer opportunities for variance from the PFI concept but to all intents and purposes PFI and PPP projects are one and the same and the two terms are now used interchangeably.

The prime objective of both is to obtain better value for money in major public procurement and to secure the provision of improved public services more quickly than would be possible under more traditional routes. A summary of the PFI/PPP process could be described thus; Bidders are invited to provide offers for the delivery of services over an extended contract period, typically in the order of 20 to 30 years. A successful bidder is usually expected to fund the design, construction and commissioning of all assets necessary to provide the service. Once the service is available for use, the Contractor is paid an agreed periodic sum that is dependent on the level of service provided. The long term contracted cash flow offers security for the Contractor to raise the finance to fund the asset construction. Throughout the contract period the Contractor is responsible for the maintenance of the asset.

The emphasis therefore is on whole life costs, revenues and risk, which is in contrast to the traditional UK contract that has focused predominantly on the creation of an asset and has given insufficient attention to performance over its economic life.

In any PFI/PPP contract, as the private sector has to fund construction of the capital asset, the cost of capital is likely to be greater than if the public sector were to borrow the same amount of money. In addition of course the contractor expects to make a profit over the life of the contract. Therefore if PFI/PPP procurement is to show better value for money for the public sector these additional costs need to be exceeded by savings from the process. The presumption that this will be the case is broadly based on two premises:

The contractor, by looking at whole life costs, will be able to provide innovative methods of delivering the service thereby reducing lifetime expenditure.

Contract risks will be the responsibility of the party best able to manage them. Thus the Contractor will take on some risks usually borne by the public sector. Through better management the cost of these risks will be reduced and absorbed in the overall payment system.

In order for the Contractor to be able to innovate and assume risk, a project needs to comprise a suitable asset/operational split. If the vast majority of the whole life project cost is attributable to the early provision of an asset, for instance a concrete sea wall, value for

money is unlikely to be achieved and the project may be little more than a hire purchase scheme. As a general rule at least 50% of the Present Value (PV) costs of a PFI/PPP project need to be made up of annual maintenance and the provision of auxiliary services.

Most importantly of all, if risk transfer and opportunities for innovation are to be achieved, a PFI contract must be based on an output specification that prescribes a service and not a design specification that describes an asset.

It is interesting to note that the PFI premise has now been adopted in many places around the world, including France, the Netherlands, Portugal, Ireland, Norway and Finland in Europe. This is in part because of its uptake by bodies such as the IMF, WTO and World Bank as they strive to reform their funding programmes. According to the National Audit Office, an organisation independent of UK government, PFI projects are more likely to be delivered on time and on budget than more traditional schemes. The exceptions tend to be where the public sector changes the specification part way through a contract.

End.

## Appendix II

### A Statement on Flood Defence for Cork

Professor Philip O'Kane CEng, FIEI October 2021

The lynch pin of the OPW design for flood walls to protect the City of Cork from flooding is the belief that the dams on the Lee are good for small floods, but not for big ones. Consequently, 1.4m high walls in the centre of Cork City will alleviate flooding from both the river and the sea. But the premise is false. The dams are good for big floods, so high walls are not required, their construction a significant waste of public funds.

Three sites for hydro-power reservoirs were examined by the ESB in the 1950s, at *Inniscarra*, *Carraigadrohid* and *Dromcara* on the Lee; the first two were built. The combined storage at these sites is more than adequate to protect Cork from the once-in-a-hundred-year design flood of the OPW, which includes a generous allowance for an adverse change in climate.

But OPW does not agree. Why?

The OPW and its consultants developed a forecasting and control system for the two existing dams that mimic the ESB's "Lee Regulations". Unfortunately, OPW addressed only one of two possible questions. Instead of asking

Q.1. How can the dams best protect the City from floods on the river, while generating **hydropower as a secondary activity** during the flood?

the OPW asked the question [my words]:

Q.2. How can the ESB continue to generate hydropower in accordance with its Lee Regulations, while providing **flood alleviation as a secondary activity**?

The answers to these two questions are very different.

The OPW's answer to Question 2 is:

2.1 The Lee dams deliver at most a 50%, and on average a 25%, reduction in the flood peak; consequently, high walls are necessary to protect the City from the river.

My answer to Question 1 is:

1.1 The Lee dams can deliver a 70% reduction in the design-flood peak, and consequently the OWP flood walls are NOT required to protect Cork from the river.

The ESB dams are, *de jure*, single-use dams for hydro-power production, which is the reason, I surmise, why the first question was not posed by OPW. But, *de facto*, the Lee Dams have been multi-purpose dams for decades providing water services to Greater Cork: hydropower, flood-alleviation, water supply, recreation, wild-life habitat and fisheries. The ESB may charge for such services. Consequently, the *Electricity (Supply) (Amendment) Act, 1945* should be changed to reflect this reality on the river Lee, and to legitimize the first question and its answer: the Lee dams can protect Cork City from the river without high walls on its quays.

The money saved by not building the high walls can be used to solve the problem of tidal flooding, to improve the dams, and to repair or maintain the historic quays of the city.

Tidal and groundwater flooding in the City may be solved with an intermittent tidal barrier at the end of Lough Mahon, (or at other locations, with or without high capacity, low-head tidal pumps). The uncertainty in sea-level rise due to changing climate, up to 0.55m in Cork according to OPW, make a tidal barrier a very flexible solution in the longer term. The Planners in both City and County should imagine and plan the long-term future of Lough Mahon (or other locations) incorporating a tidal barrier, creating a body of water with enhanced amenity, with controlled water level, salinity, and turbidity for the human and aquatic ecosystems.

There are many ways to enhance the dams for flood alleviation, in order of increasing cost:

1. A new flood-control system, which operates the reservoirs conjunctively, a significant improvement on the ESB Regulations, where the dams are operated independently.
2. A new hydro-meteorological data system; the present system is not fit for purpose.
3. A wall of fuse-gates [the hydraulic analogue of an ELCB board] replacing the auxiliary side-weir at *Carraigadrohid* doubling the volume of its flood-pool and restoring its pre-1990 value.
4. Improving dam safety at *Carraigadrohid*. The ESB has said "can't be done for dam safety reasons" which prompts the question: Is a major safety-retro-fit required at *Carraigadrohid* after 60 years of use, for example, replacing the upstream face of the dam with a 10m-thick frustum of rolled, compacted, concrete, properly keyed and founded, delivering more storage capacity?
5. A new dam and reservoir at *Dromcara/Allua*.
6. A new interceptor aqueduct along the northern side of the N22 picking up streams such as the Bride and the Curraheen that flow off the southern escarpment of the Lee valley, and debouching into the Douglas estuary, thereby reducing somewhat the need for flood storage.

Fluvial flooding can be solved by changing the operating procedure (The ESB Lee Regulations) that controls the release of water from the two reservoirs, *Carraigadrohid* and *Inniscarra*. Changing from 'lake' control to conjunctive 'e-target' control doubles the efficiency of the reservoirs in controlling floods, so that the OPW scheme of '1.4m high embankments and walls etc' is not required, with a massive saving to the public purse.

However, the problems of tidal and groundwater flooding remain. A tidal barrier at a location downriver is an obvious candidate for solving both. OPW is remiss in continuing to ignore such possibilities, even though OPW hosts the server on which the above paper may be found. Consequently, we propose that the design process be reopened to examine the full range of alternatives beyond the OPW's "emerging solution".

Philip O'Kane

Emeritus Professor UCC. Chair of Civil Engineering (1845). National University of Ireland, Cork. Honorary Fellow & Visiting Professor UNESCO-IHE Institute for Water Education, Delft, NL. Former member of the UNESCO-Italian Government Committee for the Safeguard of the Lagoon of Venice. Former Chief Technical Adviser, Portuguese National Commission for the Environment, Lisbon. Former Council Member and Hydrology Section President, European Geophysical Society.

1 The evidence in support of this proposition is contained in the 2020 paper at [www.hydrologyireland.ie](http://www.hydrologyireland.ie) web site, 2020 conference paper:

[https://hydrologyireland.ie/wp-content/uploads/2020/12/08-OKane-Protecting-the-City-of-Cork-from-Flooding\\_merged\\_final.pdf](https://hydrologyireland.ie/wp-content/uploads/2020/12/08-OKane-Protecting-the-City-of-Cork-from-Flooding_merged_final.pdf)

and also on [www.savecorkcity.org](http://www.savecorkcity.org) .

Four technical audits underpin this note. They were written *gratis pro bono publico* for <http://savecorkcity.org/> and sent to the Office of the Comptroller and Auditor General, the Chairman of the OPW, the Chief Civil Engineer of the ESB, and the Cork City Architect. The posts of Cork City and County Engineer have been discontinued.

end.

## B Statement on Morrisons Island Flood Defence

### Professor Philip O'Kane CEng, FIEI October 2021

The Morrison's Island Flood Defence project (MI) cannot deliver promised flood protection to residents, businesses and properties, unless it is fully part of the city-wide Lower Lee Flood Relief Scheme (LLFRS) proposed by the OPW. Without connection to the overall scheme, it can deliver only negligible protection locally.

OPW has been remiss in the examination of better alternatives to their 'embankments and walls on quays'. Alternative approaches exist that would protect the city from flooding more effectively and at less expense<sup>9</sup>. A tidal barrier at any of four possible locations operated in conjunction with pumps and the Lee Dams, can be demonstrated by computer simulation to be a far more beneficial solution to the protection of Cork than the OPW and City Hall scheme of a sequence of small projects split off seriatim as at Morrisons Island, none of which can provide

protection until fully and technically connected to the whole scheme.

It is clear and indisputable that Morrisons Island proposal is a highly technically dependant part of the overall LLFRS and has significant functional interdependency with the LLFRS in order to perform its designed intention.

The planned MI built defences do not appear to isolate the area from the rest of the flood vulnerable city core area, i.e. from the effects of rising groundwater levels under flood conditions and/or from reversing flow directions of surface flood waters, occurring within the rest of the city centre. In other words, the MI defences do not form a closed-ring defence-structure. Without closure, it cannot function in isolation from the LLFRS scheme.

The new walls for the South Channel, whilst providing immediate protection to the highly flood vulnerable MI area, do not address the problems their construction will create elsewhere: that of the impacts of overbank water flows from the spatially deferred flood peak heights upstream (and/or downstream) from MI, due in part to the increased MI wall heights. This results in a potential for flood water to flow back into the MI area. It may be that in the calculations in the MI plan, it was thought that ground heights in the rest of the surrounding core city area would be sufficient to form/act as a barrier under future flood conditions. But this has not been demonstrated, and it is very unlikely that it can be demonstrated because of the approximately constant relief of ground-level.

In these contexts, the MI scheme remains dependent for successful flood defence on the completion of the larger scale LLFRS works, which includes integrated Lee River catchment management elements, of which the revised operation of the Inniscarra dam for flood management is a part.

It should be noted, also, that the original practicability of this scheme (and, therefore, in turn that of the MI project as well) has been publicly challenged on a range of fundamental issues: namely, in relation to the likelihood of success of the walls/river containment approach under future sea-level rise (SLR) rates and heights, as well as future catchment runoff and discharge water volumes; the need to address the marine storm surge impacts through the building of a downstream barrier structure. If the LLFRS has 'got it wrong' (the basis of the Save Cork City objection campaign and wider objections), then so has the derivative MI scheme. The science assumptions and the appropriate future sea-level rate and height boundary values used in these schemes [Lee-CFRAMS (2006 & 2014) and the LLFRS (2017)], which are fundamental to all future flood prediction calculations, need expert independent review. This is in the light of the science and engineering best practise knowledge revisions established since 2006, e.g., under the Intergovernmental Panel for Climate Change (IPCC) Assessment Report Review 5(AR5) and the forthcoming AR6 (2021/2), as well as the experience of constructions and developments internationally of integrated coastal and river catchment flood alleviation and reclamation works. There is nothing in the submitted MI scheme (now approved by ABP) that indicates that appropriate technical re-appraisal of these critical river and linked coastal systems' operational flooding issues have been addressed.

The evidence in support of this proposition is contained in the 2020 paper at [www.hydrologyireland.ie](http://www.hydrologyireland.ie) web site, 2020 conference paper:

[https://hydrologyireland.ie/wp-content/uploads/2020/12/08-OKane-Protecting-the-City-of-Cork-from-Flooding\\_merged\\_final.pdf](https://hydrologyireland.ie/wp-content/uploads/2020/12/08-OKane-Protecting-the-City-of-Cork-from-Flooding_merged_final.pdf)

and also on [www.savecorkcity.org](http://www.savecorkcity.org).

end.

# Sources of Information

How one city revived itself in France.

<https://www.theguardian.com/cities/2019/may/20/from-bleak-to-bustling-how-one-french-town-beat-the-high-street-blues-mulhouse>

The Town Centre Living Initiative Six Pilot Towns

<https://www.gov.ie/en/publication/86215-the-town-centre-living-initiative/>

The Future of Our Pasts Outline of Climate Change and Cultural Heritage

[https://adobeindd.com/view/publications/a9a551e3-3b23-4127-99fd-a7a80d91a29e/g18m/publication-web-resources/pdf/CCHWG\\_final\\_print.pdf](https://adobeindd.com/view/publications/a9a551e3-3b23-4127-99fd-a7a80d91a29e/g18m/publication-web-resources/pdf/CCHWG_final_print.pdf)

Heritage and The Sustainable Development Goals International Council of Monuments and Sites

[https://www.icomos.org/images/DOCUMENTS/Secretariat/2021/SDG/ICOMOS\\_SDGs\\_Policy\\_Guidance\\_2021.pdf](https://www.icomos.org/images/DOCUMENTS/Secretariat/2021/SDG/ICOMOS_SDGs_Policy_Guidance_2021.pdf)

Mulhouse two decades of Recovery

[https://www.interregeurope.eu/fileadmin/user\\_upload/plp\\_uploads/events/Brussels\\_Urban\\_mobility/1. Two decades of urban renewal the rebirth of Mulhouse - part1.pdf](https://www.interregeurope.eu/fileadmin/user_upload/plp_uploads/events/Brussels_Urban_mobility/1. Two decades of urban renewal the rebirth of Mulhouse - part1.pdf)

New Life For Historic Cities The Historic Urban Landscape Approach Explained

<https://city2030.org.ua/sites/default/files/documents/news-1026-1.pdf>

Best Practice on Social Sustainability in Historic Districts

<https://digitallibrary.un.org/record/805949?ln=en>

Historic Districts for All a social and human approach for sustainable revitalization

[https://poortgebouw.org/wp-content/uploads/2016/10/UNESCO\\_HistoricDistrictsForAll.pdf](https://poortgebouw.org/wp-content/uploads/2016/10/UNESCO_HistoricDistrictsForAll.pdf)

World Heritage Papers 22 Climate Change and World Heritage

<https://whc.unesco.org/en/activities/474/>

Architecture Policy for Copenhagen

[https://kk.sites.itera.dk/apps/kk\\_pub2/index.asp?mode=detalje&id=1904](https://kk.sites.itera.dk/apps/kk_pub2/index.asp?mode=detalje&id=1904)

The Economics of Uniqueness by The World Bank

<https://openknowledge.worldbank.org/bitstream/handle/10986/12286/730720PUB0EPI001200pub0date01001012.pdf?sequence=1&isAllowed=y>

Ground and Groundwater Conditions at Cork Implications for the Lower Lee Flood Relief Scheme

Commissioned by Save Cork City Written by Anthony Beese Bsc Phd

<https://savecorkcity.org/docs/Ground-Groundwater-Report-March-2019-Anthony-Beese.pdf>

Potential Cork The Save Cork City Solution

<https://savecorkcity.org/docs/Potential-Cork-Save-Cork-City-Solution.pdf>

Submission to An Bord Pleanála Morrisons Island Public Realm and Flood Defence

<https://savecorkcity.org/docs/The-Morrisons-Island-Part-10-Submission-Save-Cork-City-to-An-Bord-Pleanala-February%202019>

Public Private Partnership in financing Flood Defences Pevensey Bay

<https://pevensey-bay.co.uk/ppp.html>

Child Friendly Cities Initiative UNICEF

<https://childfriendlycities.org>

# Cork City Flood Defence Options 2021

- a. Historic Centre
- b. Docklands
- c. Tivoli Docklands

Option	Environmental Impact	Protection	Cost	Impact
1. Flood Walls	Significant	Ground Water Failure	€250 million	€110,000 per property
2. Tivoli	Moderate	Protected Docklands	€70 million	€5,000 per property
3. Mahon	Moderate	Keeps City Open	€100 million	€7,000 per property
4. Little Island	Moderate / increasing	Greater Protection	€200 million	€10,000 per property
5. Great Island	Significant / excessive	Less Additional Protection	€1-2 Billion	€50-100,000 per property

