

Mr Pat Ledwidge,  
Director of Services  
Strategic Planning and Economic Development Directorate,  
Cork City Council,  
City Hall,  
Cork

17<sup>th</sup> June 2014

**RE: National Transport Authority's submission on the Draft Cork City Development Plan 2015-2021**

Dear Mr Ledwidge,

The Authority notes the contents of the Draft Cork City Development Plan (Draft Plan) and would support its overall objectives as presented in the Core Strategy, as providing the basis for the consolidation of Cork Metropolitan Area-generated population and employment growth within Cork City.

The Authority's comments on the Draft Plan are focused on a number of policy areas, which are considered to be critical to achieving:

- Greater consolidation of future population and employment location; and
- Integrated Land Use and Transport Planning, as manifested by:
  - the optimisation of investment by the City Council, NTA and other agencies in transport infrastructure,
  - improved and more effective public transport services,
  - improved accessibility to jobs and services, and
  - a reduction in car dependency.

With this in mind, particular attention is given to the following elements of the Draft Plan:

1. Development Location, Development Density and Integration with Investment in Transport Infrastructure and Public Transport Services;
2. Transport and Mobility, Transport Investment, Parking Policy/ Parking Standards.

# 1. Development Location, Development Density and Integration with Investment in Transport Infrastructure and Public Transport Services

## Chapter 2 – Core Strategy

### *Prioritisation of Residential Development Locations to Support Investment in Sustainable Transport*

The Authority supports the prioritisation of development in locations which facilitate development consolidation within defined public transport corridors and delivered through the preparation of local area plans for such locations. Within those plans, appropriate residential and other development densities, mix of uses, layouts, sequencing and contingent supporting transport networks and services can be determined. This type of mechanism for the prioritisation of development at the City and local levels is essential to inform the distribution and sequencing of population growth provided for in the Core Strategy and as such will have a critical bearing on the ability to optimise investment by the Council, NTA and other agencies in the requisite supporting transport infrastructure, the delivery of improved and more effective public transport services, the greater consolidation of future residential development along public transport corridors and the achievement of higher development densities, based on public transport accessibility, with particular priority being given to more central locations within the City.

### *Residential Density*

Residential densities should be determined on the basis of clearly presented public transport network and public transport service level objectives. They should not be determined solely on the basis of the capacity and frequency of existing public transport services, as this in itself would not take sufficient account of the public transport investment proposals currently being developed. Such an approach could serve to undermine the basis for future investment in public transport infrastructure and services, and the ability to deliver improved levels of service in existing priority investment corridors.

It is therefore recommended that densities are determined through a process which combines the prioritisation of development locations, or corridors with the prioritisation of investment in public transport infrastructure/ services.

### *Employment location, Employment Intensity*

The Authority would support the prioritisation of future employment development on the basis of clearly defined employment types combined with associated, stated locational, operational and employee accessibility requirements. Whilst this approach is broadly reflected in the Draft Plan's Core Strategy and policies on Employment, a closer alignment with transport policy and transport investment prioritisation over the period of the Plan, is required.

The Authority would support the use of local area plans as a means of determining the appropriate location, sequencing, scale, employment type, layout, supporting transport infrastructure and requisite public transport service levels within defined employment growth areas. This however, should be undertaken in the context of employment growth prioritisation within central parts of the City and as a basis for increasing accessibility to and the demand for public transport and strengthening the basis for investment in public transport infrastructure and services.

## **Chapter 14 - Suburban Area Policies (Jacobs Island)**

In regards to paragraph 14.6, the Authority has previously highlighted and continues to have particular concerns with the Draft Plan's provision for up to 15,000 sq.m. of mixed use development at Jacobs Island, including business and office space, the following basis:

- Its physical separation from Mahon by the N40 Mahon Interchange and the resultant local trips which would be loaded onto the interchange and the national road network;
- The challenges of delivering a level of public transport service and network accessibility which counterbalances the competitive advantage which its location adjacent to the N40 affords to car mode, for non-local trips;
- The challenges in delivering a walking and cycling environment in the vicinity of the interchange, which delivers a competitive advantage to walking and cycling for local trip making to areas, north of the interchange;
- In general, the need to consolidate future development in areas which can provide the greatest support for higher levels of public transport service in Mahon and around the district centre core.

As stated in the Mahon STTS (Jacobs Island Additional Development Assessment):

- *It would have a negative impact on the ability to create a Central Mahon with a strong sense of place;*
- *... would undermine the development of office space in Central Mahon, as well as the City Centre, Docklands and Blackpool;*
- *... contrary to national planning and transportation policy, as it would be very car dependent. It would also be very contrary to the expectations of the NTA/NRA for Mahon, in that development would be car-borne and not support smarter travel and public transport. This could undermine the case and delivery of rapid transit to Cork.*

As such, the Authority does not support this provision and would consider it to present a risk to future investment in transport infrastructure and public transport services in Cork City.

## **2. Transport and Mobility, Transport Investment, Parking Policy/ Parking Standards**

### **Chapter 5 – Transportation, Chapter 16 – Development Management (Parking Standards)**

#### ***Transport and Mobility, Parking Policy, Parking Standards***

One of the principal challenges for the Development Plan in framing its transport and mobility policies is to encapsulate all of what is required to deliver an integrated strategy for transport investment, transport demand management, development location, development intensity and development type.

This needs to be undertaken on the basis of clearly defined objectives relating to mode split for a range of trip purposes; accessibility to the City Centre, Docklands, other key development areas and strategic economic assets such as airport and port facilities and the use of and protection of

transport assets for clearly defined purposes (public transport corridors, national roads for strategic traffic, etc.).

***Consolidation of Development within public transport corridors***

As previously stated, the achievement of this objective will be contingent on the Council's prioritisation of development within central areas of the City in particular, and clearly defined public transport corridor locations and (through the mechanism of the local area plans) the application of development densities, land uses, parking standards and the achievement of local connectivity/permeability which maximises the attractiveness and utility of public transport, walking and cycling over the use of the car, for a range of trip purposes.

This can provide the basis, over time, for higher service frequencies, greater integration between services and a higher level of public transport accessibility within the City, its environs and across the Metropolitan Area.

***Transport Demand Management, Parking Policy / Parking Standards***

On the closely related issues of transport demand management, the development of an integrated transport system and parking provision, the CASP Update report (Cork Area Strategic Plan – Strategy for Additional Economic and Population Growth – An Update, July 2008), states that the *“Effective implementation of development control policies and in particular those elements that influence travel demand including densities and local transport accessibility and parking standards, have a critical bearing on the viability and success of the integrated transport system”*. The CASP Update goes on to say that *“The implementation of effective development control in supporting public transport policies is critical as transport is a derived demand directly influenced by the scale, location and density of developments and in particular by the supply of parking and alternative transport choices”*. Finally, the CASP Update emphasises the need for a co-ordinated parking policy between the two local authorities (Cork City and County councils).

In light of the CASP Update's recommendations, the Authority would emphasise the need for and the benefits of a achieving a common, agreed approach to car parking standards and their application between the City and County councils as part of their respective development plan reviews and applied within the Cork City and Environs areas.

Whilst the delivery of this investment and the associated ability to improve public transport services will be contingent on the availability of requisite funding, including that of the Regional Cities' 5 Year Transport Investment Framework, a greater degree of certainty on the location of public transport investment priorities, in combination with complementary detailed statutory plans at the local level could provide the basis for the most appropriate application of parking standards (within the stated maximum values) which reflect public transport service level objectives and appropriate development densities and mix of uses. In the case of large-scale developments, an incremental reduction in parking provision could be considered as part of a development phasing process.

It is recommended that parking standards and their application (including the manner in which the zones are defined) is informed by current investment priorities in public transport infrastructure and services for the City, over the period of the development plan and beyond.


## Key Points

In summary, in light of the views presented above, the Authority would emphasise the need for:

- A strong emphasis on a sequential approach to retail and employment development, focused in the first instance on the City Centre, Docklands and then on locations within district centres/ key development areas which centrally located within strategic public transport corridors;
- A clear link between development density and public transport provision, including the transition to higher development densities within each centre and along defined strategic public transport corridors in order to effect a reduction in trip lengths and to provide a stronger demand basis for higher frequency public transport services over time;
- A clear policy which explicitly supports the transport user hierarchy as a means of providing a coherent basis for future investment in transport infrastructure. This considers transport user needs in the following order:
  1. Pedestrians
  2. Cyclists
  3. Public transport users
  4. Freight, delivery and waste vehicles
  5. Private vehicles users
- Maximum Parking standards for non-residential development which are linked to centrality and accessibility to public transport;

I trust that the views of the Authority will be taken into consideration in the finalisation of the Plan. The Authority would also be happy to meet with members of the executive to further discuss the issues raised in this submission, should you have any questions pertaining to the implementation of the Authority's recommendations.

Yours sincerely,



Hugh Creegan

*Director of Transport Investment and Taxi Regulation*