

The Senior Planner,
The Planning Policy Unit,
Floor 13,
County Hall
Cork

26th February 2014

Re: Cork Draft County Development Plan 2013

Dear Sir,

The National Transport Authority (the Authority) welcomes the referral of the draft County Development Plan (Draft Plan). In commenting on the draft Plan, the Authority has 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 Council, NTA and other agencies in transport infrastructure,
 - improved and more effective public transport services,
 - improved accessibility to jobs and services, and
 - reduction in car dependency.

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

- The Core Strategy
- Housing (rural housing policy, distribution of housing demand, housing density)
- Categories of rural-generated housing need (Metropolitan Area)
- Employment location, Employment Intensity and the Overall Strategy for Economic Development
- Transport and Mobility, Parking Policy/ Parking Standards

In making its comments, the Authority has focused in particular on the Cork Metropolitan area.

The Core Strategy, rural housing policy, distribution of housing demand and housing density

In the CASP area, the Authority would place a critical emphasis on the need to focus future population and employment growth within the Cork City Environs in particular and a number of the larger Metropolitan Area settlements, where it can be demonstrated that further growth can contribute to greater accessibility to employment, education, retail and other services by modes other than the car, whilst reducing the need

to travel, through the planning for and provision of education, services and employment opportunities at a more localised level.

Rural Housing Policy

In this regard, the Authority supports the Draft Plan's policies on rural housing within the Metropolitan and wider CASP areas, which seek to reduce the number of houses provided for in rural areas under strong urban influence within both the Metropolitan and Ring Town greenbelt areas and so achieve a greater consolidation of urban-generated housing demand within urban areas. A strong application of this policy will be essential for the achievement of a less car dependent and more public transport focused pattern of development.

Distribution of Housing Demand and the Prioritisation of locations for Development

Within the City/ Environs and other urban settlements, 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 or special local area plans for such locations. Within those plans appropriate residential and other development densities, mix of uses, layouts, phasing and contingent supporting transport networks and services can be determined. This type of mechanism for the prioritisation of development is essential, given the broad distribution of population growth provided for in the Core Strategy, across a large number of settlements 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 transport infrastructure and the delivery of improved and more effective public transport services.

Housing Density

In regards to housing density, whilst the Draft Plan has indicated that higher densities will be applied on the basis of proximity to public transport services, the Authority would recommend that densities 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 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.

Regarding the densities specified, it is noted that a lower minimum density, of 35 dwellings per hectare (dph), is specified for town centres and areas within LAPs within existing/ proposed high quality public transport corridors than that specified in the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas* (50 dph) and that a range of between 20 and 50 dph is specified for city suburbs, larger towns and rail corridor locations (as opposed to a minimum of 35 dph specified in the Guidelines). The Authority would emphasise the need for appropriate densities to be determined through a process which combines the prioritisation of development locations or corridors with the prioritisation of investment in public transport infrastructure/ services and this could be addressed through the preparation of local area plans, as referred to above under 'prioritisation of locations for development'.

Employment location, Employment Intensity and the Overall Strategy for Economic Development

As stated in its submission on the pre-draft consultation document, the Authority would reiterate its concerns that areas prioritised for future employment growth (Strategic Employment Locations) in the

Metropolitan Area are, in general, not strongly focused on areas located within or accessible within existing or proposed public transport corridors. Certain office and other more employment intensive activities are more often accommodated in edge of city or out of town locations in lower density office park or industrial estate environments, whose primary accessibility considerations are often governed by facility of access from the national road network, rather than accessibility to public transport services.

For this reason, the Authority would favour the prioritisation of future employment development on the basis of clearly defined employment types combined with associated locational, operational and employee accessibility requirements. Whilst this approach is broadly reflected in the Draft Plan's Employment Strategy, a closer alignment with transport policy and transport investment prioritisation is required. As stated above in relation to the prioritisation of locations for development, the Authority would support the use of local area plans and special local area plans as a means of determining the appropriate location, phasing, scale, employment type, layout, supporting transport infrastructure and requisite public transport service levels.

Transport and Mobility, Parking Policy, Parking Standards

One of the principle 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 strategic economic assets such as city/ town centres, industrial, airport and port facilities; the use of and protection of transport assets for clearly defined purposes (public transport corridors, national roads for strategic traffic, etc.).

The Authority would consider the Transport and Mobility chapter in the Draft Plan to generally subscribe to this objective and will work with the Council on the delivery public transport infrastructure and public transport services which complement a policy of future development consolidation within prioritised corridors and other locations.

Consolidation of Development within public transport corridors

The Authority welcomes the inclusion of, for example, objective TM 2-5 (c) which seeks to encourage greater use of the suburban rail network and would support objectives TM 2-5 (a) & (b) which refer to future population growth and the need to ensure rail services are developed in tandem, to support this growth. As referred to above, critical to the achievement of this objective will be the Council's prioritisation of development within public transport corridor locations and (through the mechanism of the local area plan or special local area plan), the application of development densities, land uses, parking standards and local connectivity/ permeability which maximise the attractiveness and utility of public transport, walking and cycling over the use of the car, for a range of trip purposes.

The same policy should apply in the case of the key bus corridors connecting the Metropolitan Area towns, City Environs with Cork City Centre and rail network, as this will provide the basis, over time, for higher services frequencies, greater integration between services and a higher level of public transport accessibility across the Metropolitan area.

Improving Public Transport Services to Existing Peripherally located Employment Sites

In addition to the priority radial corridors, the inclusion of objective TM 2-4(c) is welcomed insofar as there is a number of peripherally located existing employment areas whose trip patterns present a particular challenge to the delivery of a public transport alternative, but where the investigation of possible bus service solutions is merited.

Information contained in the Draft Plan on current Bus Service Frequencies

Note that the information and narrative in Section 10.2.21 is not current. Since 24 March 2013, Route 215 connects Cloghroe / Blarney with Mahonpoint every 30 minutes Monday-Saturday and every 60 minutes on Sunday and Bank Holidays, offering a cross-Cork direct connection to a major destination. Since Sunday 23 February 2014, the level of bus service to Glanmire (Section 10.2.21) has been improved to half-hourly Monday to Saturday (0700 – 2400) and hourly on Sunday and Public Holidays (0900 – 2400). While the latter does not meet the aspiration of a 15 minute headway, it is a considerable improvement on the current level of service between Glanmire and the City Centre.

Provision for Bus Priority

As outlined in Objective TM 2-3, the Authority would emphasise the importance of the Council's role in providing an efficient operating environment in which bus services can operate on an efficient and reliable basis and provide a more competitive alternative to the car, win additional market share and contribute to achieving Draft Plan's sustainable transport objectives. The Authority will work with the Council on the achievement of these objectives through the current 5 Year Transport Investment Framework.

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 benefits of 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, inclusive of large population and employment locations such as Ballincollig, the Airport and Little Island.

The parking standards and their application should be informed by an agreed programme of investment in public transport infrastructure for the City/ its environs and adjacent population and employment centres, over the period of the development plans and beyond, which complements the existing 5 year Transport Investment Framework agreed with the NTA and the principles which underpin it.

Whilst the delivery of this infrastructure and the associated ability to improve public transport services will be contingent on the availability of requisite funding, 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 application of parking standards (within 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.

In regards to the parking policies and standards presented in the Draft Plan, it is recommended that a commitment is included to introduce more restrictive car parking standards in the City Environs and adjacent population and employment centres, in addition to Douglas. The Draft Plan currently advises that until similar commitments to those achieved for sustainable transport measures in Douglas are in place for other centres within the Cork Metropolitan Area, policy in relation to parking provision will remain as for the remainder of the county. This approach would result in developments being provided at more relaxed parking standards that will last well beyond the period of applicability of the Development Plan, may hamper the viability of public transport services and the ability to deliver improved public transport services over the longer term. While it is recognised that improvements need to be made to the public transport offering in general within the Metropolitan Area, these improvements will stand a greater chance of being effective if they are introduced in tandem with targeted demand management measures, following the established 'carrot and stick' approach to transport demand management.

In summary, the Draft Plan needs to include an intention to restrict parking standards in appropriate urban locations. Such an approach, widely used in large urban centres, is one of the single most successful factors in achieving a transition to more sustainable travel modes. An omission of this may be detrimental to the long-term viability of public transport services and their improvement and may reduce the potential to encourage people to change their travel behaviour over time, where alternatives the car currently exist or could otherwise be provided.

We would request that the views of the Authority be taken into consideration in the review of the development plan and would be available to discuss issues arising from the comments made.

Yours sincerely,


Hugh Creegan,
Director of Transport Investment and Taxi Regulation