

Owen Shinkwin

From: Michael MacAree
Sent: 30 May 2014 15:39
To: Owen Shinkwin
Subject: Accepted: Cork Briefing, Development Plan

Tá eolas sa teachtaireacht leictreonach seo a d'fhéadfadh bheith príobháideach nó faoi rún agus b'fhéidir go mbeadh ábhar rúnda nó pribhléideach ann. Is le h-aghaidh an duine/na ndaoine nó le h-aghaidh an aonáin atá ainmnithe thuas agus le haghaidh an duine/na ndaoine sin amháin atá an t-eolas. Tá cosc ar rochtain don teachtaireacht leictreonach seo do aon duine eile. Murab ionann tusa agus an té a bhfuil an teachtaireacht ceaptha dó bíodh a fhios agat nach gceadaítear nochtadh, cóipeáil, scaipeadh nó úsáid an eolais agus/nó an chomhaid seo agus b'fhéidir d'fhéadfadh bheith mídhleathach.

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Owen Shinkwin

From: Marian Wilson
Sent: 04 June 2014 13:57
To: Owen Shinkwin
Subject: Accepted: Cork Briefing, Development Plan

Tá eolas sa teachtaireacht leictreonach seo a d'fhéadfadh bheith príobháideach nó faoi rún agus b'fhéidir go mbeadh ábhar rúnda nó pribhléideach ann. Is le h-aghaidh an duine/na ndaoine nó le h-aghaidh an aonáin atá ainmnithe thuas agus le haghaidh an duine/na ndaoine sin amháin atá an t-eolas. Tá cosc ar rochtain don teachtaireacht leictreonach seo do aon duine eile. Murab ionann tusa agus an té a bhfuil an teachtaireacht ceaptha dó bíodh a fhios agat nach gceadaítear nochtadh, cóipeáil, scaipeadh nó úsáid an eolais agus/nó an chomhaid seo agus b'fhéidir d'fhéadfadh bheith mídhleathach.

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Owen Shinkwin

Subject: Cork City Draft Development Plan
Location: Mick's office

Start: Tue 10/06/2014 16:00
End: Tue 10/06/2014 16:30
Show Time As: Tentative - -

Recurrence: (none)

Meeting Status: Not yet responded

Organizer: Owen Shinkwin
Required Attendees: Michael MacAree

Owen Shinkwin

From: Tara Spain <tspain@nra.ie>
Sent: 15 August 2014 10:19
To: Owen Shinkwin; [REDACTED]
Subject: Fwd: NTA submission on the Draft Cork City Development Plan 2015-2021 (draft2)
Attachments: NTA submission on the Draft Cork City Development Plan 2015-2021 (draft2).docx

Sent from Samsung Mobile

----- Original message -----

From: Owen Shinkwin
Date: 17/06/2014 12:25 (GMT+00:00)
To: Tara Spain
Subject: NTA submission on the Draft Cork City Development Plan 2015-2021 (draft2)

Tara,

If you have a moment, can you let me know your views on this draft.

Thanks,

Owen

[http://transportforireland.ie/email/images/footer_r1_c1.png] <<http://www.transportforireland.ie/available-apps/>>
[http://transportforireland.ie/email/images/footer_r2_c1.png] <<http://www.transportforireland.ie/available-apps/>>
[http://transportforireland.ie/email/images/footer_r3_c1.png] <<https://twitter.com/TFIupdates>>

Tá eolas sa teachtaireacht leictreonach seo a d'fhéadfadh bheith príobháideach nó faoi rún agus b'fhéidir go mbeadh ábhar rúnda nó pribhléideach ann. Is le h-aghaidh an duine/na ndaoine nó le h-aghaidh an aonáin atá ainmnithe thuas agus le haghaidh an duine/na ndaoine sin amháin atá an t-eolas. Tá cosc ar rochtain don teachtaireacht leictreonach seo do aon duine eile. Murab ionann tusa agus an té a bhfuil an teachtaireacht ceaptha dó bíodh a fhios agat nach gceadaítear nochtadh, cóipeáil, scaipeadh nó úsáid an eolais agus/nó an chomhaid seo agus b'fhéidir d'fhéadfadh bheith mídhleathach.

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

17th 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:

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

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 would support 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.

Residential Density

In regards to housing density, densities could 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.

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 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.

In relation to the prioritisation of locations for development, 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.

Chapter 14 - Suburban Area Policies (Jacobs Island)

In regards to paragraph 14.6, the Authority would 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.

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 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 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 services 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 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.

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.

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.

Summary

In summary, the Authority would emphasise the need for:

- A stronger emphasis on sequential expansion, focused on the most central parts of the City Council area, Docklands, existing district centres and those locations along 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.

Yours sincerely,

Hugh Creegan
Director of Transport Investment and Taxi Regulation

Owen Shinkwin

From: Owen Shinkwin
Sent: 13 June 2013 15:20
To: David Clements; Michael MacAree; Roy OConnor
Subject: NTA Submission on Cork City Development Plan Review - Pre-Draft v2
Attachments: NTA Submission on Cork City Development Plan Review - Pre-Draft v2.docx

See highlighted additions

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Mr Patrick Ledwidge,
Director of Services,
Strategic Planning and Economic Development,
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17th June 2013

Re: Cork City Development Plan Review

Dear Mr Ledwidge,

The National Transport Authority (the Authority) welcomes the opportunity to submit its views on a number of the issues presented in the Section 11 Consultation Document on the review of the Cork City Development Plan. The submission sets out its concerns and recommendations in relation to the distribution of population and employment growth in the Cork Gateway and the rationale for this in relation to the integration of land use and transport planning and investment. In doing so, the City Council and County Council areas are taken to be a single and interdependent functional area. The recommendations made in this submission are consistent with those made in the Authority's submission to Cork County Council, on their Section 11 document in March 2013.

Since our establishment, the Authority has worked closely with the Cork local authorities, primarily in our role in relation to investment in sustainable transport measures in the Metropolitan area. This role has been supported and complimented by the provision of technical inputs and policy advice in the wider planning area, with a view to the integration of transport and land-use planning policy. The Authority is engaged in an ongoing basis in the following work with Cork City Council:

- City Centre Movement Strategy;
- Mahon Local Area Plan;
- Cork Strategic Networks; and
- Various Walking, Cycling and Public Transport Projects

It is in the context of this ongoing engagement that we make the following comments.

Policy Context and Implications for Future Development Patterns

The current RPG and County Development Plan and CASP Update 2008 place a strong emphasis on the location of future population and employment growth in the following locations within the Cork Gateway:

- Cork City Centre

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- Docklands
- Mahon
- Northern environs of the City;
- Along strategic transport corridors:
 - to the north (N20/ Cork-Mallow rail line),
 - to the east of the City, along the N25/ Cork-Midleton/Cobh rail line,
 - along a west-east corridor extending from Ballincollig to the City boundary (and onwards to the City Centre and Mahon) within which it is proposed to develop a bus rapid transit (BRT) route,
 - along a south-north strategic bus corridor connecting Cork Airport with Ballyvolane/ north city environs.

In the view of the Authority, the critical factors pertaining to all of the above corridors are that they need to:

- Support a greater concentration of future population and employment growth within the contiguous built up area of the City and its environs;
- Maintain and deliver a stronger focus on Cork City Centre as the primary hub for public transport service provision coupled with complementary development objectives, particularly in regard to strengthening its employment function and maintaining its primary retail function within the South West Region;
- Capitalise on existing public transport assets and provide a demand basis over time for further investment and public transport service level improvements;
- Support and benefit from a greater integration between bus and rail services;
- Provide a strong basis over the longer term for a Metropolitan Area which expands and consolidates, increasingly along a west-east corridor between Ballincollig, Cork City/environs, Docklands and Midleton, also reflecting the more favourable topography of this development orientation.

The view of the Authority at this stage, is that at a very general strategic level, the current policies guiding future development within the Metropolitan Area provide a robust, evidence basis for a stronger development emphasis on the west-east corridor referred in the final bullet point, above. This argument is of particular relevance in the context of:

- Substantially lower likely rates of population and employment growth, at least in the period to 2020, than those assumed in every current policy document pertaining to the Metropolitan Area;
- The serviceability of land for development purposes in an economically efficient manner;
- The optimisation of existing transport infrastructural assets as a basis for the location of future development – a particularly important consideration in the context of on-going financial constraints to future investment in transport infrastructure;
- Reducing the risk of development dispersal and achieving the highest possible level of development consolidation from a lower level of population and employment growth; and in doing so,
- Achieving a more environmentally sustainable and economically competitive City Region.

Notwithstanding this view, decided anomalies do exist between the relatively strong population growth focus on the west-east corridor and the relatively dispersed pattern of *Strategic Employment Centres* in the Cork Gateway. Whilst in some cases, this is based on certain functional or locational determinants pertaining to particular industrial sectors, or facilities such as port estates or the airport, there is

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nonetheless scope for a refocusing of priority employment growth locations to better support consolidation and the use of non-car modes.

Recent Population Growth and Distribution

The Metropolitan Area has experienced substantial population growth over the last 20 years, rising from 232,000 in 1991 to 272,000 in 2006 and nearly 290,000 in 2011.

This growth has not been evenly distributed, with a general trend of population decline within Cork City, a slowing rate of growth within the environs of Cork City and with the highest rates of growth now occurring in some of the Metropolitan Area towns, their semi-rural hinterlands and in the environs of some of the Ring Towns, villages and rural areas outside of the Metropolitan Area.

The lowest rates of growth and highest rates of population decline have occurred within the City Council area.

One of the challenges therefore, will be to effect a refocusing of population growth towards the Metropolitan Area, particularly within the City Council area. Emphasis would be best placed on those locations within the City Centre, including Docklands, and defined development corridors to enable a joined up approach to be taken to future development location and investment in transport infrastructure and public transport services.

Population Densities

The Metropolitan Area is characterised by generally low urban densities with the highest densities occurring in the City Centre and older suburban areas immediately to the north and south. It is in these areas that the highest rates of population decline are also occurring. The higher population density footprints (for example, population density > 1800/sq.km) are largely confined to:

- Most built up areas within the City boundary,
- Built up areas contiguous to the City (south city environs)
- Certain residential areas within Ballincollig
- Glanmire, Carrigaline, Cobh, Passage, Middleton
- A few smaller clusters associated with some smaller settlements within the Metropolitan Area

In general, the current basis for the use of transport modes other than the car is reduced by:

- The low prevailing population densities;
- Low levels of permeability within urban areas, reducing accessibility (to public transport services) at the local level;
- The small overall scale and fragmented nature of higher density population distribution;
- The relative decline of longer established and more centrally located employment areas; and
- The wide distribution of strategic employment locations across the Metropolitan Area, often peripherally located in relation to significant centres of population and existing or potential public transport corridors.

Employment Distribution, Employment Densities and Locational Determinants

In general, within the Metropolitan Area, employment is not strongly focused on locations accessible by public transport. Even in the case of the City Centre, employment is relatively weakly concentrated, containing only c.13% of the total jobs located in Cork City and County. On the contrary, office and

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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 ease of access from the national road network, rather than accessibility to public transport services. This pattern is in large measure reflected in and reinforced by some of the *Strategic Employment Locations*, as identified in the CASP and prioritised for future employment growth. Notwithstanding the policy to increase the numbers of jobs in the central area including Docklands, and other locations in the city council area such as Mahon and Kilbarry, much emphasis is still being placed on more peripheral locations, such as:

- Little Island/Carrigtwohill
- Ringaskiddy/ Carrigaline
- Whitegate
- Cork Airport
- Ballincollig

In summary, most of the locations prioritised for employment growth in the metropolitan area, by virtue of:

- Their peripheral locations within, or disjoint from larger centres of population;
- Their generally low density formats and fragmented development patterns;
- Severance levels for pedestrians and cyclists, associated with car orientated layouts;
- Their lack of proximity to, or poor local connectivity with priority public transport corridors or existing public transport services;
- Their very dispersed employment trip patterns and poor match with existing public transport service patterns; and
- The competitive advantage which their accessibility to the national road network has over any potential public transport alternative, compounded by a lack of any meaningful demand management of the national road network;

do not currently provide sufficient supporting basis for more public transport-oriented trip patterns and by association, a more consolidated development form within the Metropolitan Area.

In the context of recent population and employment trends, future growth is likely to occur at substantially lower rates than that assumed in CASP and the City and County development plans' core strategies. In the event, lower overall projected rates of growth should be reflected in a corresponding adjustment in the distribution of that growth, to ensure that at whatever level of development, the highest possible level of consolidation within and in the environs of the City is achieved. This would also have the associated advantage of maximising the extent to which accessibility by public transport and other non-car modes can be achieved and by association, protecting existing and proposed investment in transport infrastructure and public transport services.

Car Parking

The current emphasis on car-based accessibility to places of work is reflected in another strong determinant of modal choice, namely the current parking standards that apply. These both reflect the weakness of these locations from a public transport, walking and cycling accessibility perspective as well as reinforcing the high car mode shares which already apply in each of these locations. In this regard, the Authority would support the approach to parking policy, proposed under Section 4 of the County Council's Section 11 Consultation Document "Planning for Cork County's Future". This relates to the development of a metropolitan car parking standard and a scheme for parking based on centrality and

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public transport accessibility for non-residential developments. The NTA would recommend that explicit reference to such an objective be included in the City Development Plan.

Travel Patterns and Mode Splits

As referred to above, the Metropolitan Area, including the City Council area, is characterised by a dispersed pattern of journeys to work, with correspondingly high car mode shares (>75%) applying at most significant employment destinations, with particularly high values applying at those locations which are on or in close proximity to the national road network, namely: Carrigtwohill, Little Island and Douglas. The mode split for car for trips to work in the City Centre is 64%, significantly higher than the Smarter Travel target of 45%.

In relation to other modes, walking is the second most popular for work trips to the City Centre, with 1 in 5 trips to workplaces in this location being undertaken on foot. This relates broadly to the proportion of the workforce living within the locality and walking often being the only significant alternative mode available. Bus mode shares are generally less than 5% at the main employment destinations, with 9% of trips to Cork City Centre being undertaken by that mode. 2% of work trips to Cork City Centre are by rail. The table below sets out the mode split for the Cork City Council area as well as the 10 most central Electoral Divisions, combined as "Cork City Centre".

Destination/Mode	Walking	Cycling	Car Driver	Car Pass	Van	Bus	Rail	M'Cycle
Cork City Council	14.1%	1.5%	67.2%	6.3%	2.3%	6.7%	0.7%	0.7%
Cork City Centre (10 EDs)	20.6%	2.2%	56.7%	6.9%	1.9%	9.0%	2.0%	0.6%

Retail Development

The Authority notes that a joint retail strategy is currently being prepared by Cork City and County Councils and would support the potential for coherent approach to the hierarchy of retail centres and distribution of retail floorspace which a joint approach could achieve.

Consistent with the need for consolidation, focused on the City and its environs, the Authority would support a strong emphasis on both sustaining and expanding on the role of the City Centre as a retail centre serving the City, its environs and the wider Metropolitan Area. This focus, in turn, needs to be reflected in the number, scaling and accessibility attributes of district centres within the Metropolitan Area, with a presumption against the provision of higher order comparison retail floorspace, accessibility to the national road network and car parking which is not subject to appropriate demand management.

The basis for this can be supported, in part, by the Authority's current investment priorities in the Metropolitan area (through the current 5 year transport investment framework) in particular:

- the development of a number of well performing radially-based bus corridors connecting the City Centre with the outer suburban areas;
- the delivery of more reliable travel times for buses operating through the City Centre (most services currently operate on a cross-city basis); and
- the review of existing bus service patterns and delivering more effective services which optimise consistency with bus service patterns and actual trip patterns, across a range of trip purposes.

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In regards to the likelihood of lower rates of population growth than currently forecast, the Authority would also support the monitoring retail policies over time, given that most of the projected retail floorspace requirements and its distribution is linked to population growth and the distribution of that growth.

Conclusions and Recommendations

Conclusions

Current trip patterns and policy objectives point to the critical role which the private car currently plays in almost every aspect of the social and economic life of Cork City.

Development patterns over the last 40 years have established and increasingly reinforced the transition from a mono-centric regional city whose population and employment was largely contained within Cork City to a greatly expanded polycentric city region, but where employment location has been determined on an increasingly separate basis, away from 'settlement' locations, based increasingly on the city region's national road network and strategic port/ industrial sites in the lower harbour.

This has gone hand in hand with increasing car ownership levels, relatively low urban densities, high levels of one-off housing development within the Metropolitan Area's immediate rural hinterland, the relative decline of the City Centre as the commercial focus and a high level of investment in high capacity roads whose originally intended 'strategic' function has been combined with their now primary use, in accommodating car-based commuting over both longer and shorter distances. This has been facilitated by the short intervals between junctions and an absence of demand management, consistent with their originally intended function and often necessitated by an absence of a feasible alternative mode choice relating to current trip patterns.

From this point, the potential for a tempering of these historic trends has been identified in this submission, not based on a wholesale reversal of current policies and investment priorities but largely on the basis of current policies, but with a greater focus on a west-east development corridor, extending between Ballincollig, the City Centre, Docklands and Midleton, within which stronger trip associations can develop over time, increasingly on the basis of public transport use, walking and cycling, for a range of journey purposes.

NTA Recommendations

In Cork City, the car will continue to play a central role. In order to provide the basis for the increased use of public transport, walking and cycling, policies which encourage and facilitate these modes will need to form part of the City Development Plan. This approach needs to be reflected in all aspects of the future development and management of Cork City, and as such the Authority makes the following recommendations for consideration in the making of the draft development plan:

- A stronger emphasis on sequential expansion, focused on the most central parts of the City Council area, Docklands, existing district centres and those locations along 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;

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- 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
- That a policy requiring the application of *Achieving Effective Workplace Travel Plans – Guidance for Local Authorities*, published by the NTA in 2012, is inserted into the plan;
- Parking standards for non-residential development which are linked to centrality and accessibility to public transport;
- A metropolitan area-wide approach to parking standards developed in conjunction with Cork County Council;
- That policies stating the following will be adhered to in future land-use and transport developments is inserted into the plan:
 - National Cycle Manual (NTA, 2011)
 - Sustainable Residential Development in Urban Areas (DoE, 2009)
 - Best Practice Urban Design Manual (DoE, 2009)
- With the exception of large-scale regionally important generators of economic activity, a movement away from discreet single-use development areas towards mixed use development formats.

We would request that the views of the Authority be taken into consideration in the review of the development plan and would welcome the opportunity for further discussion during the course of the plan's preparation.

Yours sincerely,

Hugh Creegan,
Director of Transport Investment and Taxi Regulation

Owen Shinkwin

From: Owen Shinkwin
Sent: 13 June 2013 14:56
To: David Clements; Michael MacAree; Roy OConnor
Subject: NTA Submission on Cork City Development Plan Review - Pre-Draft v2
Attachments: NTA Submission on Cork City Development Plan Review - Pre-Draft v2.docx

All,

Revised draft for discussion / agreement. Roy, in your case, any written feedback would be welcome and please feel free to add addition points relating to the transport investment framework.

Owen

DRAFT 2



Mr Patrick Ledwidge,
Director of Services,
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17th June 2013

Re: Cork City Development Plan Review

Dear Mr Ledwidge,

The National Transport Authority (the Authority) welcomes the opportunity to submit its views on a number of the issues presented in the Section 11 Consultation Document on the review of the Cork City Development Plan. The submission sets out its concerns and recommendations in relation to the distribution of population and employment growth in the Cork Gateway and the rationale for this in relation to the integration of land use and transport planning and investment. In doing so, the City Council and County Council areas are taken to be a single and interdependent functional area. The recommendations made in this submission are consistent with those made in the Authority's submission to Cork County Council, on their Section 11 document in March 2013.

Since our establishment, the Authority has worked closely with the Cork local authorities, primarily in our role in relation to investment in sustainable transport measures in the Metropolitan area. This role has been supported and complimented by the provision of technical inputs and policy advice in the wider planning area, with a view to the integration of transport and land-use planning policy. The Authority is engaged in an ongoing basis in the following work with Cork City Council:

- City Centre Movement Strategy;
- Mahon Local Area Plan;
- Cork Strategic Networks; and
- Various Walking, Cycling and Public Transport Projects

It is in the context of this ongoing engagement that we make the following comments.

Policy Context and Implications for Future Development Patterns

The current RPG and County Development Plan and CASP Update 2008 place a strong emphasis on the location of future population and employment growth in the following locations within the Cork Gateway:

- Cork City Centre

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- Docklands
- Mahon
- Northern environs of the City;
- Along strategic transport corridors:
 - to the north (N20/ Cork-Mallow rail line),
 - to the east of the City, along the N25/ Cork-Midleton/Cobh rail line,
 - along a west-east corridor extending from Ballincollig to the City boundary (and onwards to the City Centre and Mahon) within which it is proposed to develop a bus rapid transit (BRT) route,
 - along a south-north strategic bus corridor connecting Cork Airport with Ballyvolane/ north city environs.

In the view of the Authority, the critical factors pertaining to all of the above corridors are that they need to:

- Support a greater concentration of future population and employment growth within the contiguous built up area of the City and its environs;
- Maintain and deliver a stronger focus on Cork City Centre as the primary hub for public transport service provision coupled with complementary development objectives, particularly in regard to strengthening its employment function and maintaining its primary retail function within the South West Region;
- Capitalise on existing public transport assets and provide a demand basis over time for further investment and public transport service level improvements;
- Support and benefit from a greater integration between bus and rail services;
- Provide a strong basis over the longer term for a Metropolitan Area which expands and consolidates, increasingly along a west-east corridor between Ballincollig, Cork City/environs, Docklands and Midleton, also reflecting the more favourable topography of this development orientation.

The view of the Authority at this stage, is that at a very general strategic level, the current policies guiding future development within the Metropolitan Area provide a robust, evidence basis for a stronger development emphasis on the west-east corridor referred in the final bullet point, above. This argument is of particular relevance in the context of:

- Substantially lower likely rates of population and employment growth, at least in the period to 2020, than those assumed in every current policy document pertaining to the Metropolitan Area;
- The serviceability of land for development purposes in an economically efficient manner;
- The optimisation of existing transport infrastructural assets as a basis for the location of future development – a particularly important consideration in the context of on-going financial constraints to future investment in transport infrastructure;
- Reducing the risk of development dispersal and achieving the highest possible level of development consolidation from a lower level of population and employment growth; and in doing so,
- Achieving a more environmentally sustainable and economically competitive City Region.

Notwithstanding this view, decided anomalies do exist between the relatively strong population growth focus on the west-east corridor and the relatively dispersed pattern of *Strategic Employment Centres* in the Cork Gateway. Whilst in some cases, this is based on certain functional or locational determinants pertaining to particular industrial sectors, or facilities such as port estates or the airport, there is

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nonetheless scope for a refocusing of priority employment growth locations to better support consolidation and the use of non-car modes.

Recent Population Growth and Distribution

The Metropolitan Area has experienced substantial population growth over the last 20 years, rising from 232,000 in 1991 to 272,000 in 2006 and nearly 290,000 in 2011.

This growth has not been evenly distributed, with a general trend of population decline within Cork City, a slowing rate of growth within the environs of Cork City and with the highest rates of growth now occurring in some of the Metropolitan Area towns, their semi-rural hinterlands and in the environs of some of the Ring Towns, villages and rural areas outside of the Metropolitan Area.

The lowest rates of growth and highest rates of population decline have occurred within the City Council area.

One of the challenges therefore, will be to effect a refocusing of population growth towards the Metropolitan Area, particularly within the City Council area. Emphasis would be best placed on those locations within the City Centre, including Docklands, and defined development corridors to enable a joined up approach to be taken to future development location and investment in transport infrastructure and public transport services.

Population Densities

The Metropolitan Area is characterised by generally low urban densities with the highest densities occurring in the City Centre and older suburban areas immediately to the north and south. It is in these areas that the highest rates of population decline are also occurring. The higher population density footprints (for example, population density > 1800/sq.km) are largely confined to:

- Most built up areas within the City boundary,
- Built up areas contiguous to the City (south city environs)
- Certain residential areas within Ballincollig
- Glanmire, Carrigaline, Cobh, Passage, Midleton
- A few smaller clusters associated with some smaller settlements within the Metropolitan Area

In general, the current basis for the use of transport modes other than the car is reduced by:

- The low prevailing population densities;
- Low levels of permeability within urban areas, reducing accessibility (to public transport services) at the local level;
- The small overall scale and fragmented nature of higher density population distribution;
- The relative decline of longer established and more centrally located employment areas; and
- The wide distribution of strategic employment locations across the Metropolitan Area, often peripherally located in relation to significant centres of population and existing or potential public transport corridors.

Employment Distribution, Employment Densities and Locational Determinants

In general, within the Metropolitan Area, employment is not strongly focused on locations accessible by public transport. Even in the case of the City Centre, employment is relatively weakly concentrated, containing only c.13% of the total jobs located in Cork City and County. On the contrary, office and

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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 ease of access from the national road network, rather than accessibility to public transport services. This pattern is in large measure reflected in and reinforced by some of the *Strategic Employment Locations*, as identified in the CASP and prioritised for future employment growth. Notwithstanding the policy to increase the numbers of jobs in the central area including Docklands, and other locations in the city council area such as Mahon and Kilbarry, much emphasis is still being placed on more peripheral locations, such as:

- Little Island/Carrigtwohill
- Ringaskiddy/ Carrigaline
- Whitegate
- Cork Airport
- Ballincollig

Other priority employment locations within the County include:

- ~~Cork Science and Innovation Park (Curraheen)~~

~~Whilst some of these locations, namely Ballincollig, Curraheen, Little Island and Carrigtwohill are located within the west-east corridor referred to above and as such are broadly related to a number of priority bus, BRT and rail-based public transport corridors, the specific location of employment-zoned lands in these areas are often not specifically supportive of public transport use, by virtue of:~~

- ~~• Their distance of existing rail lines/ priority bus corridors, proposed BRT routes;~~
- ~~• Their extensive layouts and associated low levels of employment intensity on an area basis;~~
- ~~• The relatively poor match between current employment trip patterns and priority public transport corridors or existing public transport service patterns; and~~
- ~~• The overriding influence of these locations' proximity to the national road network (and the lack of specific demand management measures relating to its use) over any potential public transport alternative.~~

In summary, most of the locations prioritised for employment growth in the metropolitan area, by virtue of:

- Their peripheral locations within, or disjoint from larger centres of population;
- Their generally low density formats and fragmented development patterns;
- Severance levels for pedestrians and cyclists, associated with car orientated layouts;
- Their lack of proximity to, or poor local connectivity with priority public transport corridors or existing public transport services;
- Their very dispersed employment trip patterns and poor match with existing public transport service patterns; and
- The competitive advantage which their accessibility to the national road network has over any potential public transport alternative, compounded by a lack of any meaningful demand management of the national road network;

do not currently provide sufficient supporting basis for more public transport-oriented trip patterns and by association, a more consolidated development form within the Metropolitan Area.

In the context of recent population and employment trends, future growth is likely to occur at substantially lower rates than that assumed in CASP and the City and County development plans' core

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strategies. In the event, lower overall projected rates of growth should be reflected in a corresponding adjustment in the distribution of that growth, to ensure that at whatever level of development, the highest possible level of consolidation within and in the environs of the City is achieved. This would also have the associated advantage of maximising the extent to which accessibility by public transport and other non-car modes can be achieved and by association, protecting existing and proposed investment in transport infrastructure and public transport services.

Car Parking

The current emphasis on car-based accessibility to places of work is reflected in another strong determinant of modal choice, namely the current parking standards that apply. These both reflect the weakness of these locations from a public transport, walking and cycling accessibility perspective as well as reinforcing the high car mode shares which already apply in each of these locations. In this regard, the Authority would support the approach to parking policy, proposed under Section 4 of the County Council's Section 11 Consultation Document "Planning for Cork County's Future". This relates to the development of a metropolitan car parking standard and a scheme for parking based on centrality and public transport accessibility for non-residential developments. The NTA would recommend that explicit reference to such an objective be included in the City Development Plan.

Travel Patterns and Mode Splits

As referred to above, the Metropolitan Area, including the City Council area, is characterised by a dispersed pattern of journeys to work, with correspondingly high car mode shares (>75%) applying at most significant employment destinations, with particularly high values applying at those locations which are on or in close proximity to the national road network, namely: Carrigtwohill, Little Island and Douglas. The mode split for car for trips to work in the City Centre is 64%, significantly higher than the Smarter Travel target of 45%.

In relation to other modes, walking is the second most popular for work trips to the City Centre, with 1 in 5 trips to workplaces in this location being undertaken on foot. This relates broadly to the proportion of the workforce living within the locality and walking often being the only significant alternative mode available. Bus mode shares are generally less than 5% at the main employment destinations, with 9% of trips to Cork City Centre being undertaken by that mode. 2% of work trips to Cork City Centre are by rail. The table below sets out the mode split for the Cork City Council area as well as the 10 most central Electoral Divisions, combined as "Cork City Centre".

Destination/Mode	Walking	Cycling	Car Driver	Car Pass	Van	Bus	Rail	M'Cycle
Cork City Council	14.1%	1.5%	67.2%	6.3%	2.3%	6.7%	0.7%	0.7%
Cork City Centre (10 EDs)	20.6%	2.2%	56.7%	6.9%	1.9%	9.0%	2.0%	0.6%

~~Examination of work trip distribution from specific locations reveals a broad and dispersed pattern in most cases but with a significant association between origins and destinations within each locality of origin, particularly in areas further distant from Cork City/environs. Other apparent work trip associations relate to origins and destinations along the N40 South Ring/ N22/ N25 corridor (including linking national roads such as the M8, N27 and N28), and between Ringaskiddy and Carrigaline.~~

Retail Development

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The Authority notes that a joint retail strategy is currently being prepared by Cork City and County Councils and would support the potential for coherent approach to the hierarchy of retail centres and distribution of retail floorspace which a joint approach could achieve.

Consistent with the need for consolidation, focused on the City and its environs, the Authority would support a strong emphasis on both sustaining and expanding on the role of the City Centre as a retail centre serving the City, its environs and the wider Metropolitan Area. The basis for this can be supported, in part, by the Authority's current investment priorities in the Metropolitan area (through the current 5 year transport investment framework) in particular:

- the development of a number of well performing radially-based bus corridors connecting the City Centre with the outer suburban areas;
- the delivery of more reliable travel times for buses operating through the City Centre (most services currently operate on a cross-city basis); and
- the review of existing bus service patterns and delivering more effective services which optimise consistency with bus service patterns and actual trip patterns, across a range of trip purposes.

Conclusions and Recommendations

Conclusions

Current trip patterns and policy objectives point to the critical role which the private car currently plays in almost every aspect of the social and economic life of Cork City.

Development patterns over the last 40 years have established and increasingly reinforced the transition from a mono-centric regional city whose population and employment was largely contained within Cork City to a greatly expanded polycentric city region, but where employment location has been determined on an increasingly separate basis, away from 'settlement' locations, based increasingly on the city region's national road network and strategic port/ industrial sites in the lower harbour.

This has gone hand in hand with increasing car ownership levels, relatively low urban densities, high levels of one-off housing development within the Metropolitan Area's immediate rural hinterland, the relative decline of the City Centre as the commercial focus and a high level of investment in high capacity roads whose originally intended 'strategic' function has been combined with their now primary use, in accommodating car-based commuting over both longer and shorter distances. This has been facilitated by the short intervals between junctions and an absence of demand management, consistent with their originally intended function and often necessitated by an absence of a feasible alternative mode choice relating to current trip patterns.

From this point, the potential for a tempering of these historic trends has been identified in this submission, not based on a wholesale reversal of current policies and investment priorities but largely on the basis of current policies, but with a greater focus on a west-east development corridor, extending between Ballincollig, the City Centre, Docklands and Midleton, within which stronger trip associations can develop over time, increasingly on the basis of public transport use, walking and cycling, for a range of journey purposes.

NTA Recommendations

In Cork City, the car will continue to play a central role. In order to provide the basis for the increased use of public transport, walking and cycling, policies which encourage and facilitate these modes will

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need to form part of the City Development Plan. This approach needs to be reflected in all aspects of the future development and management of Cork City, and as such the Authority makes the following recommendations for consideration in the making of the draft development plan:

- A stronger emphasis on sequential expansion, focused on the most central parts of the City Council area, Docklands, existing district centres and those locations along 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
- That a policy requiring the application of *Achieving Effective Workplace Travel Plans – Guidance for Local Authorities*, published by the NTA in 2012, is inserted into the plan;
- Parking standards for non-residential development which are linked to centrality and accessibility to public transport;
- A metropolitan area-wide approach to parking standards developed in conjunction with Cork County Council;
- That policies stating the following will be adhered to in future land-use and transport developments is inserted into the plan:
 - National Cycle Manual (NTA, 2011)
 - Sustainable Residential Development in Urban Areas (DoE, 2009)
 - Best Practice Urban Design Manual (DoE, 2009)
- With the exception of large-scale regionally important generators of economic activity, a movement away from discreet single-use development areas towards mixed use development formats.

We would request that the views of the Authority be taken into consideration in the review of the development plan and would welcome the opportunity for further discussion during the course of the plan's preparation.

Yours sincerely,

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Hugh Creegan,
Director of Transport Investment and Taxi Regulation

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Owen Shinkwin

From: Owen Shinkwin
Sent: 13 June 2013 18:34
To: [REDACTED]
Subject: NTA Submission on Cork City Development Plan Review - Pre-Draft v2
Attachments: NTA Submission on Cork City Development Plan Review - Pre-Draft v2.docx

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Mr Patrick Ledwidge,
Director of Services,
Strategic Planning and Economic Development,
Cork City Council,
City Hall,
Anglesea Street,
Cork

Harcourt Lane, Dublin 2

Ógán Seirde Baile Átha Cliath

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email: info@nationaltransport.ie

web: www.nationaltransport.ie

17th June 2013

Re: Cork City Development Plan Review

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In the view of the Authority, the critical factors pertaining to all of the above corridors are that they need to:

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The view of the Authority at this stage, is that at a very general strategic level, the current policies guiding future development within the Metropolitan Area provide a robust, evidence basis for a stronger development emphasis on the west-east corridor referred in the final bullet point, above. This argument is of particular relevance in the context of:

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The lowest rates of growth and highest rates of population decline have occurred within the City Council area.

One of the challenges therefore, will be to effect a refocusing of population growth towards the Metropolitan Area, particularly within the City Council area. Emphasis would be best placed on those locations within the City Centre, including Docklands, and defined development corridors to enable a joined up approach to be taken to future development location and investment in transport infrastructure and public transport services.

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In summary, most of the locations prioritised for employment growth in the metropolitan area, by virtue of:

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do not currently provide sufficient supporting basis for more public transport-oriented trip patterns and by association, a more consolidated development form within the Metropolitan Area.

In the context of recent population and employment trends, future growth is likely to occur at substantially lower rates than that assumed in CASP and the City and County development plans' core strategies. In the event, lower overall projected rates of growth should be reflected in a corresponding adjustment in the distribution of that growth, to ensure that at whatever level of development, the highest possible level of consolidation within and in the environs of the City is achieved. This would also have the associated advantage of maximising the extent to which accessibility by public transport and other non-car modes can be achieved and by association, protecting existing and proposed investment in transport infrastructure and public transport services.

Car Parking

The current emphasis on car-based accessibility to places of work is reflected in another strong determinant of modal choice, namely the current parking standards that apply. These both reflect the weakness of these locations from a public transport, walking and cycling accessibility perspective as well as reinforcing the high car mode shares which already apply in each of these locations. In this regard, the Authority would support the approach to parking policy, proposed under Section 4 of the County Council's Section 11 Consultation Document "Planning for Cork County's Future". This relates to the development of a metropolitan car parking standard and a scheme for parking based on centrality and

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public transport accessibility for non-residential developments. The NTA would recommend that explicit reference to such an objective be included in the City Development Plan.

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Retail Development

The Authority notes that a joint retail strategy is currently being prepared by Cork City and County Councils and would support the potential for coherent approach to the hierarchy of retail centres and distribution of retail floorspace which a joint approach could achieve.

Consistent with the need for consolidation, focused on the City and its environs, the Authority would support a strong emphasis on both sustaining and expanding on the role of the City Centre as a retail centre serving the City, its environs, the wider Metropolitan Area and South West Region. This focus, in turn, needs to be reflected in the number, scaling and accessibility attributes of district centres within the Metropolitan Area, with a presumption against the provision of higher order comparison retail floorspace, accessibility to the national road network and car parking which is not subject to appropriate demand management.

The basis for this can be supported, in part, by the Authority's current investment priorities in the Metropolitan area (through the current 5 year transport investment framework) in particular:

- the development of a number of well performing radially-based bus corridors connecting the City Centre with the outer suburban areas;
- the delivery of more reliable travel times for buses operating through the City Centre (most services currently operate on a cross-city basis); and
- the review of existing bus service patterns and delivering more effective services which optimise consistency with bus service patterns and actual trip patterns, across a range of trip purposes.

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In regards to the likelihood of lower rates of population growth than currently forecast, the Authority would also support the monitoring retail policies over time, given that most of the projected retail floorspace requirements and its distribution is linked to population growth and the distribution of that growth.

Conclusions and Recommendations

Conclusions

Current trip patterns and policy objectives point to the critical role which the private car currently plays in almost every aspect of the social and economic life of Cork City.

Development patterns over the last 40 years have established and increasingly reinforced the transition from a mono-centric regional city whose population and employment was largely contained within Cork City to a greatly expanded polycentric city region, but where employment location has been determined on an increasingly separate basis, away from 'settlement' locations, based increasingly on the city region's national road network and strategic port/ industrial sites in the lower harbour.

This has gone hand in hand with increasing car ownership levels, relatively low urban densities, high levels of one-off housing development within the Metropolitan Area's immediate rural hinterland, the relative decline of the City Centre as the commercial focus and a high level of investment in high capacity roads whose originally intended 'strategic' function has been combined with their now primary use, in accommodating car-based commuting over both longer and shorter distances. This has been facilitated by the short intervals between junctions and an absence of demand management, consistent with their originally intended function and often necessitated by an absence of a feasible alternative mode choice relating to current trip patterns.

From this point, the potential for a tempering of these historic trends has been identified in this submission, not based on a wholesale reversal of current policies and investment priorities but largely on the basis of current policies, but with a greater focus on a west-east development corridor, extending between Ballincollig, the City Centre, Docklands and Midleton, within which stronger trip associations can develop over time, increasingly on the basis of public transport use, walking and cycling, for a range of journey purposes.

NTA Recommendations

In Cork City, the car will continue to play a central role. In order to provide the basis for the increased use of public transport, walking and cycling, policies which encourage and facilitate these modes will need to form part of the City Development Plan. This approach needs to be reflected in all aspects of the future development and management of Cork City, and as such the Authority makes the following recommendations for consideration in the making of the draft development plan:

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 - Best Practice Urban Design Manual (DoE, 2009)
- With the exception of large-scale regionally important generators of economic activity, a movement away from discreet single-use development areas towards mixed use development formats.

We would request that the views of the Authority be taken into consideration in the review of the development plan and would welcome the opportunity for further discussion during the course of the plan's preparation.

Yours sincerely,

Hugh Creegan,

Director of Transport Investment and Taxi Regulation

Owen Shinkwin

From: Owen Shinkwin
Sent: 13 June 2013 18:38
To: [REDACTED]
Subject: NTA Submission on Cork City Development Plan Review - Pre-Draft v2a
Attachments: NTA Submission on Cork City Development Plan Review - Pre-Draft v2a.docx

DRAFT

Mr Patrick Ledwidge,
Director of Services,
Strategic Planning and Economic Development,
Cork City Council,
City Hall, Anglesea Street,
Cork

June 2013

Re: Cork City Development Plan Review

Dear Mr Ledwidge,

The National Transport Authority (the Authority) welcomes the opportunity to submit its views on a number of the issues presented in the Section 11 Consultation Document on the review of the Cork City Development Plan. The submission sets out its concerns and recommendations in relation to the distribution of population and employment growth in the Cork Gateway and the rationale for this in relation to the integration of land use and transport planning and investment. In doing so, the City Council and County Council areas are taken to be a single and interdependent functional area. The recommendations made in this submission are consistent with those made in the Authority's submission to Cork County Council, on their Section 11 document in March 2013.

Since our establishment, the Authority has worked closely with the Cork local authorities, primarily in our role in relation to investment in sustainable transport measures in the Metropolitan area. This role has been supported and complimented by the provision of technical inputs and policy advice in the wider planning area, with a view to the integration of transport and land-use planning policy. The Authority is engaged in an ongoing basis in the following work with Cork City Council:

- City Centre Movement Strategy;
- Mahon Local Area Plan;
- Cork Strategic Networks; and
- Various Walking, Cycling and Public Transport Projects

It is in the context of this ongoing engagement that we make the following comments.

Policy Context and Implications for Future Development Patterns

The current RPG and County Development Plan and CASP Update 2008 place a strong emphasis on the location of future population and employment growth in the following locations within the Cork Gateway:

- Cork City Centre
- Docklands

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- Mahon
- Northern environs of the City;
- Along strategic transport corridors:
 - to the north (N20/ Cork-Mallow rail line),
 - to the east of the City, along the N25/ Cork-Midleton/Cobh rail line,
 - along a west-east corridor extending from Ballincollig to the City boundary (and onwards to the City Centre and Mahon) within which it is proposed to develop a bus rapid transit (BRT) route,
 - along a south-north strategic bus corridor connecting Cork Airport with Ballyvolane/north city environs.

In the view of the Authority, the critical factors pertaining to all of the above corridors are that they need to:

- Support a greater concentration of future population and employment growth within the contiguous built up area of the City and its environs;
- Maintain and deliver a stronger focus on Cork City Centre as the primary hub for public transport service provision coupled with complementary development objectives, particularly in regard to strengthening its employment function and maintaining its primary retail function within the South West Region;
- Capitalise on existing public transport assets and provide a demand basis over time for further investment and public transport service level improvements;
- Support and benefit from a greater integration between bus and rail services;
- Provide a strong basis over the longer term for a Metropolitan Area which expands and consolidates, increasingly along a west-east corridor between Ballincollig, Cork City/environs, Docklands and Midleton, also reflecting the more favourable topography of this development orientation.

The view of the Authority at this stage, is that at a very general strategic level, the current policies guiding future development within the Metropolitan Area provide a robust, evidence basis for a stronger development emphasis on the west-east corridor referred in the final bullet point, above. This argument is of particular relevance in the context of:

- Substantially lower likely rates of population and employment growth, at least in the period to 2020, than those assumed in every current policy document pertaining to the Metropolitan Area;
- The serviceability of land for development purposes in an economically efficient manner;
- The optimisation of existing transport infrastructural assets as a basis for the location of future development – a particularly important consideration in the context of on-going financial constraints to future investment in transport infrastructure;
- Reducing the risk of development dispersal and achieving the highest possible level of development consolidation from a lower level of population and employment growth; and in doing so,
- Achieving a more environmentally sustainable and economically competitive City Region.

Notwithstanding this view, decided anomalies do exist between the relatively strong population growth focus on the west-east corridor and the relatively dispersed pattern of *Strategic Employment Centres* in the Cork Gateway. Whilst in some cases, this is based on certain functional or locational determinants pertaining to particular industrial sectors, or facilities such as port estates or the airport, there is nonetheless scope for a refocusing of priority employment growth locations to better support consolidation and the use of non-car modes.

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Recent Population Growth and Distribution

The Metropolitan Area has experienced substantial population growth over the last 20 years, rising from 232,000 in 1991 to 272,000 in 2006 and nearly 290,000 in 2011.

This growth has not been evenly distributed, with a general trend of population decline within Cork City, a slowing rate of growth within the environs of Cork City and with the highest rates of growth now occurring in some of the Metropolitan Area towns, their semi-rural hinterlands and in the environs of some of the Ring Towns, villages and rural areas outside of the Metropolitan Area.

The lowest rates of growth and highest rates of population decline have occurred within the City Council area.

One of the challenges therefore, will be to effect a refocusing of population growth towards the Metropolitan Area, particularly within the City Council area. Emphasis would be best placed on those locations within the City Centre, including Docklands, and defined development corridors to enable a joined up approach to be taken to future development location and investment in transport infrastructure and public transport services.

Population Densities

The Metropolitan Area is characterised by generally low urban densities with the highest densities occurring in the City Centre and older suburban areas immediately to the north and south. It is in these areas that the highest rates of population decline are also occurring. The higher population density footprints (for example, population density > 1800/sq.km) are largely confined to:

- Most built up areas within the City boundary,
- Built up areas contiguous to the City (south city environs)
- Certain residential areas within Ballincollig
- Glanmire, Carrigaline, Cobh, Passage, Middleton
- A few smaller clusters associated with some smaller settlements within the Metropolitan Area

In general, the current basis for the use of transport modes other than the car is reduced by:

- The low prevailing population densities;
- Low levels of permeability within urban areas, reducing accessibility (to public transport services) at the local level;
- The small overall scale and fragmented nature of higher density population distribution;
- The relative decline of longer established and more centrally located employment areas; and
- The wide distribution of strategic employment locations across the Metropolitan Area, often peripherally located in relation to significant centres of population and existing or potential public transport corridors.

Employment Distribution, Employment Densities and Locational Determinants

In general, within the Metropolitan Area, employment is not strongly focused on locations accessible by public transport. Even in the case of the City Centre, employment is relatively weakly concentrated, containing only c.13% of the total jobs located in Cork City and County. On the contrary, 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

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accessibility considerations are often governed by ease of access from the national road network, rather than accessibility to public transport services. This pattern is in large measure reflected in and reinforced by some of the *Strategic Employment Locations*, as identified in the CASP and prioritised for future employment growth. Notwithstanding the policy to increase the numbers of jobs in the central area including Docklands, and other locations in the city council area such as Mahon and Kilbarry, much emphasis is still being placed on more peripheral locations, such as:

- Little Island/Carrigtwohill
- Ringaskiddy/ Carrigaline
- Whitegate
- Cork Airport
- Ballincollig

In summary, most of the locations prioritised for employment growth in the metropolitan area, by virtue of:

- Their peripheral locations within, or disjoint from larger centres of population;
- Their generally low density formats and fragmented development patterns;
- Severance levels for pedestrians and cyclists, associated with car orientated layouts;
- Their lack of proximity to, or poor local connectivity with priority public transport corridors or existing public transport services;
- Their very dispersed employment trip patterns and poor match with existing public transport service patterns; and
- The competitive advantage which their accessibility to the national road network has over any potential public transport alternative, compounded by a lack of any meaningful demand management of the national road network;

do not currently provide sufficient supporting basis for more public transport-oriented trip patterns and by association, a more consolidated development form within the Metropolitan Area.

In the context of recent population and employment trends, future growth is likely to occur at substantially lower rates than that assumed in CASP and the City and County development plans' core strategies. In the event, lower overall projected rates of growth should be reflected in a corresponding adjustment in the distribution of that growth, to ensure that at whatever level of development, the highest possible level of consolidation within and in the environs of the City is achieved. This would also have the associated advantage of maximising the extent to which accessibility by public transport and other non-car modes can be achieved and by association, protecting existing and proposed investment in transport infrastructure and public transport services.

Car Parking

The current emphasis on car-based accessibility to places of work is reflected in another strong determinant of modal choice, namely the current parking standards that apply. These both reflect the weakness of these locations from a public transport, walking and cycling accessibility perspective as well as reinforcing the high car mode shares which already apply in each of these locations. In this regard, the Authority would support the approach to parking policy, proposed under Section 4 of the County Council's Section 11 Consultation Document "Planning for Cork County's Future". This relates to the development of a metropolitan car parking standard and a scheme for parking based on centrality and public transport accessibility for non-residential developments. The NTA would recommend that explicit reference to such an objective be included in the City Development Plan.

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Travel Patterns and Mode Splits

As referred to above, the Metropolitan Area, including the City Council area, is characterised by a dispersed pattern of journeys to work, with correspondingly high car mode shares (>75%) applying at most significant employment destinations, with particularly high values applying at those locations which are on or in close proximity to the national road network, namely: Carrigtwohill, Little Island and Douglas. The mode split for car for trips to work in the City Centre is 64%, significantly higher than the Smarter Travel target of 45%.

In relation to other modes, walking is the second most popular for work trips to the City Centre, with 1 in 5 trips to workplaces in this location being undertaken on foot. This relates broadly to the proportion of the workforce living within the locality and walking often being the only significant alternative mode available. Bus mode shares are generally less than 5% at the main employment destinations, with 9% of trips to Cork City Centre being undertaken by that mode. 2% of work trips to Cork City Centre are by rail. The table below sets out the mode split for the Cork City Council area as well as the 10 most central Electoral Divisions, combined as "Cork City Centre".

Destination/Mode	Walking	Cycling	Car Driver	Car Pass	Van	Bus	Rail	M'Cycle
Cork City Council	14.1%	1.5%	67.2%	6.3%	2.3%	6.7%	0.7%	0.7%
Cork City Centre (10 EDs)	20.6%	2.2%	56.7%	6.9%	1.9%	9.0%	2.0%	0.6%

Retail Development

The Authority notes that a joint retail strategy is currently being prepared by Cork City and County Councils and would support the potential for coherent approach to the hierarchy of retail centres and distribution of retail floorspace which a joint approach could achieve.

Consistent with the need for consolidation, focused on the City and its environs, the Authority would support a strong emphasis on both sustaining and expanding on the role of the City Centre as a retail centre serving the City, its environs, the wider Metropolitan Area and South West Region. This focus, in turn, needs to be reflected in the number, scaling and accessibility attributes of district centres within the Metropolitan Area, with a presumption against the provision of higher order comparison retail floorspace, accessibility to the national road network and car parking which is not subject to appropriate demand management.

The basis for this can be supported, in part, by the Authority's current investment priorities in the Metropolitan area (through the current 5 year transport investment framework) in particular:

- the development of a number of well performing radially-based bus corridors connecting the City Centre with the outer suburban areas;
- the delivery of more reliable travel times for buses operating through the City Centre (most services currently operate on a cross-city basis); and
- the review of existing bus service patterns and delivering more effective services which optimise consistency with bus service patterns and actual trip patterns, across a range of trip purposes.

In regards to the likelihood of lower rates of population growth than currently forecast, the Authority would also support the monitoring retail policies over time, given that most of the projected retail floorspace requirements and its distribution is linked to population growth and the distribution of that growth.

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Conclusions and Recommendations

Conclusions

Current trip patterns and policy objectives point to the critical role which the private car currently plays in almost every aspect of the social and economic life of Cork City.

Development patterns over the last 40 years have established and increasingly reinforced the transition from a mono-centric regional city whose population and employment was largely contained within Cork City to a greatly expanded polycentric city region, but where employment location has been determined on an increasingly separate basis, away from 'settlement' locations, based increasingly on the city region's national road network and strategic port/ industrial sites in the lower harbour.

This has gone hand in hand with increasing car ownership levels, relatively low urban densities, high levels of one-off housing development within the Metropolitan Area's immediate rural hinterland, the relative decline of the City Centre as the commercial focus and a high level of investment in high capacity roads whose originally intended 'strategic' function has been combined with their now primary use, in accommodating car-based commuting over both longer and shorter distances. This has been facilitated by the short intervals between junctions and an absence of demand management, consistent with their originally intended function and often necessitated by an absence of a feasible alternative mode choice relating to current trip patterns.

From this point, the potential for a tempering of these historic trends has been identified in this submission, not based on a wholesale reversal of current policies and investment priorities but largely on the basis of current policies, but with a greater focus on a west-east development corridor, extending between Ballincollig, the City Centre, Docklands and Midleton, within which stronger trip associations can develop over time, increasingly on the basis of public transport use, walking and cycling, for a range of journey purposes.

NTA Recommendations

In Cork City, the car will continue to play a central role. In order to provide the basis for the increased use of public transport, walking and cycling, policies which encourage and facilitate these modes will need to form part of the City Development Plan. This approach needs to be reflected in all aspects of the future development and management of Cork City, and as such the Authority makes the following recommendations for consideration in the making of the draft development plan:

- A stronger emphasis on sequential expansion, focused on the most central parts of the City Council area, Docklands, existing district centres and those locations along 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:

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1. Pedestrians
2. Cyclists
3. Public transport users
4. Freight, delivery and waste vehicles
5. Private vehicles users

- That a policy requiring the application of *Achieving Effective Workplace Travel Plans – Guidance for Local Authorities*, published by the NTA in 2012, is inserted into the plan;
- Parking standards for non-residential development which are linked to centrality and accessibility to public transport;
- A metropolitan area-wide approach to parking standards developed in conjunction with Cork County Council;
- That policies stating the following will be adhered to in future land-use and transport developments is inserted into the plan:
 - National Cycle Manual (NTA, 2011)
 - Sustainable Residential Development in Urban Areas (DoE, 2009)
 - Best Practice Urban Design Manual (DoE, 2009)
- With the exception of large-scale regionally important generators of economic activity, a movement away from discreet single-use development areas towards mixed use development formats.

We would request that the views of the Authority be taken into consideration in the review of the development plan and would welcome the opportunity for further discussion during the course of the plan's preparation.

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Owen Shinkwin

From: Tara Spain <tspain@nra.ie>
Sent: 15 May 2013 14:15
To: Owen Shinkwin
Subject: Re: City council plan draft review

Godlike powers!
And no mention of statutory guidelines
I have a vicious submission written already.

----- Original Message -----

From: Owen Shinkwin <owen.shinkwin@nationaltransport.ie>
To: Tara Spain
Sent: Wed May 15 14:11:27 2013
Subject: RE: City council plan draft review

Tara, I see where you're coming from now (p.12 of consultation document), which could be interpreted as you've described.
In our submission, I think a clarification will be necessary.

-----Original Message-----

From: Tara Spain [<mailto:tspain@nra.ie>]
Sent: 15 May 2013 14:06
To: Owen Shinkwin
Subject: Re: City council plan draft review

I know that Owen but if the city council think your paying for it..

----- Original Message -----

From: Owen Shinkwin <owen.shinkwin@nationaltransport.ie>
To: Tara Spain
Sent: Wed May 15 14:00:26 2013
Subject: RE: City council plan draft review

Tara,

The NTA would not be the funding agency for the North Ring.

On the issue of demand management of the existing N40, whilst the NRA would be responsible for measures designed to manage traffic on or directly accessing it. In the case of associated or complementary demand management measures on the local road network, the NTA could work with the relevant local authorities in devising and funding such measures.

Regards,

Owen

-----Original Message-----

From: Tara Spain [mailto:tspain@nra.ie]
Sent: 15 May 2013 13:37
To: Owen Shinkwin
Subject: City council plan draft review

So are ye paying for the northern ring road and demand management on N40?

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I'm supporting The Gathering Ireland 2013. Go to www.thegatheringireland.com and Be Part of it!

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Owen Shinkwin

From: Tara Spain <tspain@nra.ie>
Sent: 09 June 2014 13:18
To: Owen Shinkwin
Subject: RE: cork city plan

All your emails are spamed as usual

From: Owen Shinkwin [<mailto:owen.shinkwin@nationaltransport.ie>]
Sent: 09 June 2014 12:16
To: Tara Spain
Subject: RE: cork city plan

Tara,

Yes, that would be fine.
Are you over here to meet Mick, on Wednesday?

Owen




From: Tara Spain [<mailto:tspain@nra.ie>]
Sent: 09 June 2014 09:20
To: Owen Shinkwin
Subject: cork city plan

Owen
I will be sending this out on Thursday.
Maybe we can discuss on Wednesday when I'm over in the NTA.
Regards
Tara

Tara Spain
Senior Policy Advisor (Planning)
National Roads Authority
St. Martins House
Waterloo Road
Dublin 4
Direct Dial 0035316658849

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Owen Shinkwin

From: Owen Shinkwin
Sent: 20 June 2014 10:01
To: Marian Wilson
Subject: RE: cork submission

Marian,

Whilst the emphasis at the moment is on the delivery of a bus network, including (BRT) which can provide a stronger focus for future development patterns, integration between bus and rail is also an important issue. The rail corridor between Kent Station and Midleton/ Cobh is important in that it service a number of fairly large and fast growing settlements and a number of large employment clusters which the potential for better rail accessibility. There is also the longer term prospect for the redevelopment of the Tivoli Port Estate.

We would hope to work closely with both the City and County Councils when it comes to the preparation/ review of local area plans along this corridor.

On the cross city issue, it's difficult to know at this stage what scale and time frame will apply to any future development, north of the City. The County will be preparing a local area plan for the northern environs of the City, which might have a bearing on the case for an additional station on this part of the network and thus the demand potential demand for cross city rail services.

I will be liaising with you on these matters as they arise and more immediately, on the Strategic Corridor Assessment studies being undertaken for the SW, SE and N/NE sectors of the City.

Regards,

Owen

From: Marian Wilson
Sent: 18 June 2014 14:07
To: Owen Shinkwin
Subject: RE: cork submission

Thanks Owen,

I can see and I agree with the argument advanced that the CCC should develop compatible land use development densities on corridors where p.t. infrastructure exists reflecting their potential rather than limiting their consideration to existing levels of service, but I think we should as I pointed out set different target densities for corridors that are served by rail and bus, reflecting the higher capacity and greater fixity of rail by comparison with bus.

CCC doesn't seem to appreciate in any way that it enjoys a suburban rail network. Probably because the existing levels of service are quite poor, and the cross-Cork functionality is withheld. However, I still can't forgive 'em.

Regards,




MW

From: Owen Shinkwin
Sent: 17 June 2014 17:16
To: Marian Wilson
Subject: cork submission

Marian,

As requested.

Owen

 <small>Right-click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.</small>
 <small>Right-click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.</small>
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Tá eolas sa teachtaireacht leictreonach seo a d'fhéadfadh bheith príobháideach nó faoi rún agus b'fhéidir go mbeadh ábhar rúnda nó pribhléideach ann. Is le h-aghaidh an duine/na ndaoine nó le h-aghaidh an aonáin atá ainmnithe thuas agus le haghaidh an duine/na ndaoine sin amháin atá an t-eolas. Tá cosc ar rochtain don teachtaireacht leictreonach seo do aon duine eile. Murab ionann tusa agus an té a bhfuil an teachtaireacht ceaptha dó bíodh a fhios agat nach gceadaítear nochtadh, cóipeáil, scaipeadh nó úsáid an eolais agus/nó an chomhaid seo agus b'fhéidir d'fhéadfadh bheith mídhleathach.

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Owen Shinkwin

From: Owen Shinkwin
Sent: 20 June 2014 10:42
To: Marian Wilson
Subject: RE: cork submission

Marian,

Following completion of the Manager's report and its presentation to the council, a number of proposed amendments may arise from this, which will then go on public display.

The following outlines the process:

What Happens Next ?

This initial public consultation process lasted 8 weeks from the 22nd April to the 17th June 2013. Following this, submissions were analysed and a City Manager's Report on the consultation process was prepared for submission to Council. The City Manager's Report on Development Plan consultation was considered by Council and was approved. The City Manager's Report on the Development Plan can be downloaded here:

[City Manager's Report on Development Plan](#)

The timetable beyond this will be as follows:

The Draft Cork City Development Plan 2015 - 2021 has been issued for public consultaion from 8th April to 17th June 2014. It can be viewed at www.corkcitydevelopmentplan.ie

- A second Manager's Report will be prepared mid 2014 on the submissions to the Draft Plan. This will then go to Council before a final Plan is agreed. The new Plan is expected to be adopted in early 2015.

Extract from P&D Act 2000

(6) Where, following the consideration of the draft development plan and the manager's report, it appears to the members of the authority that the draft should be accepted or amended, subject to *subsection (7)*, they may, by resolution, accept or amend the draft and make the development plan accordingly.

(7) (a) In case the proposed amendment would, if made, be a material alteration of the draft concerned, the planning authority shall, not later than 3 weeks after the passing of a

resolution under *subsection (6)*, publish notice of the proposed amendment in at least one newspaper circulating in its area.

(b) A notice under *paragraph*

(a) shall state that—

(i) a copy of the proposed amendment of the draft development plan may be inspected at a stated place and at stated times during a stated period of not less than 4 weeks (and the copy shall be kept available for inspection accordingly), and

(ii) written submissions or observations with respect to the proposed amendment of the draft made to the planning authority within the stated period shall be taken into consideration before the making of any amendment.

(8) (a) Not later than 8 weeks after giving notice under *subsection (7)*, the manager of a planning authority shall prepare a report on any submissions or observations received under that subsection and submit the report to the members of the authority for their

consideration.

(b) A report under *paragraph*

(a) shall—

(i) list the persons or bodies
who made submissions
or observations under
this section.

(ii) summarise the issues
raised by the persons or
bodies in the
submissions,

(iii) give the response of the
manager to the issues
raised, taking account of
the directions of the
members of the authority
or the committee
under *section 11 (4)*, the
proper planning and
sustainable development
of the area, the statutory
obligations of any local
authority in the area and
any relevant policies or
objectives for the time
being of the Government
or of any Minister of the
Government.

Owen

From: Marian Wilson
Sent: 20 June 2014 10:09
To: Owen Shinkwin
Subject: RE: cork submission

Owen,

Happy to discuss further.

On an issue of process – can you advise me? There is, I think, a 3rd round of public consultation sometime later this year on the Cork City Development Plan. If silly people in residents associations who missed the deadline of 14 June 2014 did not make a submission in round 2, can they make any contribution / comment in round 3?

Marian

From: Owen Shinkwin
Sent: 20 June 2014 10:01
To: Marian Wilson
Subject: RE: cork submission

Marian,

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Subject: cork submission

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Owen Shinkwin

From: Tara Spain <tspain@nra.ie>
Sent: 17 June 2014 12:44
To: Owen Shinkwin
Subject: RE: NTA submission on the Draft Cork City Development Plan 2015-2021 (draft2)
Attachments: NTA submission on the Draft Cork City Development Plan 2015-2021 (draft2 ts.docx)




From: Owen Shinkwin [<mailto:owen.shinkwin@nationaltransport.ie>]
Sent: 17 June 2014 12:22
To: Tara Spain
Subject: NTA submission on the Draft Cork City Development Plan 2015-2021 (draft2)

Tara,

If you have a moment, can you let me know your views on this draft.

Thanks,

Owen

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 [broken image icon]
 [broken image icon]

Tá eolas sa teachtaireacht leictreonach seo a d'fhéadfadh bheith príobháideach nó faoi rún agus b'fhéidir go mbeadh ábhar rúnda nó pribhléideach ann. Is le h-aghaidh an duine/na ndaoine nó le h-aghaidh an aonáin atá ainmnithe thuas agus le haghaidh an duine/na ndaoine sin amháin atá an t-eolas. Tá cosc ar rochtain don teachtaireacht leictreonach seo do aon duine eile. Murab ionann tusa agus an té a bhfuil an teachtaireacht ceaptha dó bíodh a fhios agat nach gceadaítear nochtadh, cóipeáil, scaipeadh nó úsáid an eolais agus/nó an chomhaid seo agus b'fhéidir d'fhéadfadh bheith mídhleathach.

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

17th 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.

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cm + Indent at: 1.27 cm

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 ~~would support~~ 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.

Residential Density

In regards to housing density, densities could 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 in the current draft?) as-~~S~~uch 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. Are they doing that ? assume Jacobs Island/ Mahon is the pblem

It is therefore recommended that densities (revisited in locations to be highlighted in next section ?) 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 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. How?

In relation to the prioritisation of locations for development, 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.How?

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Comment [TS1]: Is this paragraph just a commentary ? WHAT ARE YOU RECOMMENDING

Comment [TS2]: Do they have to do something? They'll say they are doing this?

Chapter 14 - Suburban Area Policies (Jacobs Island)

In regards to paragraph 14.6, the Authority ~~has previous highlighted and continues to have~~ would 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 key development areas and strategic economic assets such as

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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 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 services frequencies, greater integration between services and a higher level of public transport accessibility within the City, its environs and across the Metropolitan Area.

Comment [TS3]: What have they to do

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 and 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.

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.

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.

Summary

In summary, the Authority would emphasise the need for:

- A stronger emphasis on sequential expansion, focused on the most central parts of the City Council area, Docklands, existing district centres and those locations along 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.

Yours sincerely,

Hugh Creegan
Director of Transport Investment and Taxi Regulation

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Owen Shinkwin

From: Tara Spain <tspain@nra.ie>
Sent: 09 June 2014 13:23
To: Owen Shinkwin
Subject: RE: cork city plan

[REDACTED]

From: Owen Shinkwin [<mailto:owen.shinkwin@nationaltransport.ie>]
Sent: 09 June 2014 13:21
To: Tara Spain
Subject: RE: cork city plan

[REDACTED]

From: Tara Spain [<mailto:tspain@nra.ie>]
Sent: 09 June 2014 13:18
To: Owen Shinkwin
Subject: RE: cork city plan

[REDACTED]

From: Owen Shinkwin [<mailto:owen.shinkwin@nationaltransport.ie>]
Sent: 09 June 2014 12:16
To: Tara Spain
Subject: RE: cork city plan

Tara,

Yes, that would be fine.
Are you over here to meet Mick, on Wednesday?

Owen

From: Tara Spain [<mailto:tspain@nra.ie>]
Sent: 09 June 2014 09:20
To: Owen Shinkwin
Subject: cork city plan

Owen
I will be sending this out on Thursday.
Maybe we can discuss on Wednesday when I'm over in the NTA.
Regards
Tara

Tara Spain
Senior Policy Advisor (Planning)

National Roads Authority
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Direct Dial 0035316658849

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