

## Chapter 2 – Core Strategy

### ***Prioritisation of Residential Development Location***

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, phasing and contingent supporting transport networks and services can be determined. This type of mechanism for the prioritisation of development at the City level is essential to inform the distribution and sequencing of population and employment 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 transport infrastructure and the delivery of improved and more effective public transport services.

### ***Residential Density***

In regards to housing density, densities could also 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.

Need to emphasise the need for appropriate densities to be determined through a process which combines the prioritisation of development locations or corridors with the prioritisation of investment in public transport infrastructure/ services and this could be addressed through the preparation of local area plans.

### ***Employment location, Employment Intensity***

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 close alignment with transport policy and transport investment prioritisation 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, phasing, scale, employment type, layout, supporting transport infrastructure and requisite public transport service levels.

### ***Jacobs Island (additional points)***

Serious concerns in relation to the location of significant additional development, particularly non-residential development to the south of the Mahon Interchange, in particular,

- Its physical separation from Mahon by the N40 Mahon Interchange and the resultant local trips which would be loaded onto the interchange;
- 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.

In addition, the following points in the Mahon STTS (Jacobs Island Additional Development Assessment) are noted:

- *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.*

## **Chapter 5 – Transportation**

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

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

This needs to be undertaken on the basis of clearly defined objectives relating to mode split for a range of trip purposes; accessibility to key development areas and strategic economic assets such as airport and port facilities; the use of and protection of transport assets for clearly defined purposes (public transport corridors, national roads for strategic traffic, etc.).

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

Critical to the achievement of this objective will be the Council's prioritisation of development within public transport corridor locations and (through the mechanism of the local area plans), the application of development densities, land uses, parking standards and local connectivity/permeability which maximise the attractiveness and utility of public transport, walking and cycling over the use of the car, for a range of trip purposes.

The same policy should apply in the case of the key bus corridors connecting the Key Development Areas with Cork City Centre and rail station, as this will 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 a achieving a common, agreed approach to car parking standards and their application between the City and County councils as part of their respective development plan reviews and applied within the Cork City and Environs areas.

It is recommended that parking standards and their application is informed by an agreed programme of investment in public transport infrastructure for the City, over the period of the development plans and beyond, which complements the existing 5 year Transport Investment Framework agreed with the NTA and the principles which underpin it.

Whilst the delivery of this infrastructure and the associated ability to improve public transport services will be contingent on the availability of requisite funding, a greater degree of certainty on the location of public transport investment priorities, in combination with complementary detailed statutory plans at the local level could provide the basis for the application of parking standards (within 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.

The Department notes the overall contents of the Cork City Draft Development Plan 2015-2021 and considers that the overall aims and approach of the draft plan have been presented very clearly and concisely and in an easy to read and understand format.

The Department wishes to make the following detailed comments and recommendations.

- (1) The Department would agree with the high level goals set out in section 2.7 and considers that these respond very effectively to the relevant regulatory and policy framework for planning established by the Government and the Minister including the National Spatial Strategy, Regional Planning Guidelines and relevant guidelines addressed within the plan and summarised in Appendix A.
- (2) The Department also agrees with the strategic approach of the City Council in section 2.14 in accepting the need to plan proactively both within a current economic context that is challenging but also for a future where economic recovery is becoming more certain.
- (3) The reference to the likelihood of a new national planning framework to replace the NSS by 2015 is noted and in this connection, Ministers Hogan and O'Sullivan are bringing proposals to Government in relation to that objective and to ensure local level planning is working to clear national objectives of Government.
- (4) In relation to residential development in Section 2 and taking account of the Government's priority objective that resurgent demand is met in a timely fashion by appropriate supply, the detail of sections 2.16-2.18 is noted in that the zoned areas of the draft plan can cater for the around 20,455 housing units required in line with the South West Regional Authority Regional Planning Guidelines out to the horizon of 2022 and beyond, determined by whether or not sufficient demand materialises in line with prevailing economic conditions.
- (5) Notwithstanding (4) above, the Department is of the view that the draft plan would benefit from a residential lands active management strategy that would (a) map the key parcels likely to move over the lifetime of the plan coupled to (b) identification of the key parcels that might be promoted further by the council if the parcels at (a) did not progress to development, as well as (c) establish a tracking mechanism as to extant permissions and how these are progressing or not as the case may be including activities to enquire as to why approved developments are not progressing and appropriate responses. In this regard, it would be relevant to examine planning related actions in the recently published Government strategy for the renewal of the construction sector.
- (6) The Department fully supports the ambitious targets in the draft plan as regards the location of an additional 16,000 additional jobs in the city council area to 2021 and that the city centre and adjoining areas to be the primary target in relation to the location of 7,500 jobs out of the 16,000 job total.
- (7) The Department will work proactively with the City Council in advancing its well thought out strategies for the city centre, including the city centre movement strategy, place branding and wider docklands reports.
- (8) At the same time, the Department understands the role that the development of the Mahon area has been playing in ensuring that, as the docklands area is readied for major regeneration, the city council area can present viable locations for employment related investment.

- (9) Notwithstanding the above, and taking account of the high level objectives of national planning policy and indeed section 2.7 of the draft city plan, the Department has very significant concerns about the scale of employment proposed for Mahon and most specifically, the detailed strategy under Section 2.25 for Jacobs Island area, which were recently revised in the local area plan and which the Department also expressed serious reservations about.
- (10) The policies of the draft city plan under Section 2.25 and in particular objective ZO20, with its underlying objective for 15,000 sq m science and technology activities are incompatible with wider core strategy of the draft city development plan because:
- a. The dilution effect of the viability of the city centre as the prime employment node to be created;
  - b. The dispersal effect of the focused development of Mahon as an interim location for employment in the south eastern quadrant of the city council area;
  - c. The very significant infrastructural constraints in the development of the Jacob's Island area which have been the subject of adverse decisions by An Bord Pleanála;
  - d. The complete unsuitability of this area for such a significant level of employment development given that it is not served nor is likely to be served to any substantial degree by an effective public transport service and is highly reliant on the Mahon Junction and N40. Therefore resultant trips would be likely to be an entirely car-based and would be loaded onto the national road network which is completely contrary to guidance included in the Department's Spatial Planning and National Roads Guidelines for Planning Authorities and to the government's policy framework for sustainable travel and transport; and
  - e. The sense that the local area plan has been led by a developer led approach as opposed to being founded on a strategic and plan led approach.
- (11) Accordingly, while the Department agree's with the wider economic strategy in section 3 and the docklands strategy in particular in section 13, it is specifically requesting that objective 2.25 and related objectives under Sections 14.6 and 16.8 be deleted from the draft development plan and replaced by non-development land related objectives because of their incompatibility with the wider city plan core strategy and the unsuitability of such a location for such uses having regard to a number of planning guidelines including the planning guidelines on spatial planning and national roads and the strategy on smarter travel.
- (12) In expressing such significant concerns above, the Department wishes to make it clear that these are in the same vein as its observations on the Mahon Local Area Plan, which concerns the Department decided to address more firmly in the context of the draft city development plan and the need to set an appropriate policy context that the local plan may have to be modified to be consistent with.
- (13) The planning authority should be aware that in making the plan, if recommendation (1) is not addressed satisfactorily, the Minister will further consider what steps to take to ensure that both the internal policies of the plan are consistent and consistent with national policy.
- (14) The Department fully supports the draft retail strategy in section 4 and particularly the objective to reduce vacant floorspace in the city centre by 50% from a very high level of 31%. At the same time, it considers that the draft plan would benefit

from additional proposals on what practical steps could and should be taken to achieve such an ambitious target whether by reduction in business costs and local taxes and charges, through property market interventions or business improvement district type initiatives.

- (15) The Department also strongly supports the transportation strategy with the proviso that the city has arguably got some way to go in becoming more attractive to vulnerable road users and that more progress is needed in rebalancing freed up road space for public transport services and walking/cycling given the legacies of extensive one way systems which for sustainable modes can result in circuitous routes and the prevalence of non-cyclist friendly junctions in some parts of the eastern side of the city centre and which at the same time contrasts with very good facilities on some corridors – e.g. Mahon greenway.
- (16) In this regard, the city centre movement strategy is particularly welcomed with the proviso that early progress is advised around Objective 5.11 regarding the need for a cycling strategy.
- (17) In relation to housing policies in Section 6, the planning authority may wish to monitor national policy developments as regards the approach to Part V of the Act and the need to ensure delivery of social housing units as part of new housing projects.
- (18) The Department endorses the sustainable neighbourhood approach in section 7 and suggests that there may be a merit in developing this a step further in terms of considering/presenting the city in terms of neighbourhood zones that respond to the “Egans Wheel” concept outlined in the section.
- (19) Section 8 on arts, culture and tourism, section 9 on heritage, section 10 on landscape and natural heritage and section 11 on recreational infrastructure collectively present a very strong strategy designed to build up Cork’s already very strong identity, its very high quality of life offer and which further anchors Cork City’s place proposition in an international investment context lining back to sections 2 and 3.
- (20) With regard to chapter 12 in relation to environmental infrastructure and management, the Department notes the statement about further assessment being needed on flood risk but would be of the view and subject to the OPW’s submission in this regard that the plan be much clearer on how, practically, the planning guidelines on flood risk have influenced the draft plan as compared to the previous plan, including an overlay of CFRAMS and zoning maps commensurate with the application of any relevant tests – how has the plan been made differently as a result of the guidelines.

Finally, the Department requests that the points above and in particular points 9-13, be reflected and acted upon by the Council in the finalisation of the draft city development plan, a key document in relation to the State’s planning policies as regards the development of its key cities.



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**Pat Ledwidge  
Director of Services  
Planning & Development Directorate  
City Hall  
Cork City**

June 2014

**NRA Ref: 14-89838**

**DRAFT CORK CITY DEVELOPMENT PLAN**

Dear Mr. Ledwidge,

The Authority welcomes consultation on the Draft Cork City Council Development Plan 2015-2021 and considers that the overall aims and approach of the draft plan are presented very clearly and concisely and in an easy to understand format.

Having reviewed the document the Authority wishes to make the following detailed comments and recommendations.

**1. TRANSPORT**

As acknowledged in paragraph 3.16, Cork has excellent roads and rail connectivity to Dublin and the east, with requirement for improvements to Limerick and Kerry in this regard the Authority acknowledges that need for the City Council working with other stakeholders which will support measures to improve transport networks into and around Cork city and region as indicated in objectives 3.5 and 3.6. The Authority also welcomes and supports the inclusion of paragraphs 5.12 -5.17 and associated objectives 5.1, 5.6, 5.7 and 5.8.

The following items need to be addressed:

**a) N40 Demand Management Study**

The N40 is heavily trafficked with AADT's of over 70,000 being recorded at some locations. It is noteworthy that the HGV percentage associated with the higher AADT locations are relatively low at approx 3.3%. In contrast, HGV's make up some 9% of traffic on the M8 north of Dunkettle.

In light of recent An Bord Pleanála decisions and proposed developments in the Cork Area and along the N40, it is considered appropriate that a demand management strategy is developed at this stage to manage the impact of further traffic growth on the N40. This growth would result in further congestion, reduced reliability and potentially erode the level of service provided by the N40. Preliminary findings from this study have highlighted significant issues of congestion at national road junction.

The Authority considers it crucial that there is detailed analysis of the impacts of the existing and future land uses on the operation of the national road junctions and the adjoining mainline to facilitate the development of appropriate and meaningful mitigation measures with regard to the management of traffic on the N40 as a whole. It is

considered that to alleviate the impacts of congestion on the N40 system measures need to be agreed such as demand management measures, smarter workforce travel planning, area travel planning and management, revised traffic management arrangements, and modification of the local roads network.

The Study is scheduled to be completed in late summer and the Authority considers it essential that the findings and proposals in the N40 Demand Management Study are incorporated in the revised draft plan.

**b) Traffic and Transport Assessment (TTA) and Road Safety Audits (RSA)**

The Authority notes and welcomes the inclusion of Objective 5.4 and paragraph 16.4. The planning authority is advised that the Authority has prepared revised Traffic and Transport Assessment Guidelines (2014), which are available at [www.nra.ie](http://www.nra.ie) and could be referenced in the Draft Plan as appropriate guidance. The Guidelines also include recommendations on the requirement for sub-threshold and area based transport assessment for forward planning.

**c) Road Safety Audits (RSA) and Road Safety Impact Assessment (RSIA)**

The Road Safety Authority's Road Safety Strategy 2013-2020 builds on existing road safety interventions, but reframes the way in which road safety is viewed and managed in the community. In this regard the design of development proposals must address the functionality and safety of the road needs. Two processes specifically address these design concerns should be referred to in the development plan:

- Road Safety Impact Assessment (RSIA) is described in the EU Directive on Road Infrastructure Safety Management (EU RISM) 2008/96/EC as a strategic comparative analysis of the impact of a new road, or for substantial modifications to an existing road, on the safety performance of the road network. (Refer to NRA standard: NRA HD 19 Road Safety Impact Assessment)
- Road Safety Audit (RSA) involves the evaluation of road schemes during design, construction and early operation to identify potential hazards to all road users. RSA is to be carried out on all new national road infrastructure projects and on any schemes/proposal which results in a permanent change to the layout of a national road. (Refer to NRA standard: NRA HD 19 'Road Safety Audits')

RSIA is a separate process to Road Safety Audit (RSA). While RSA examines the safety aspects within a scheme, RSIA considers the safety impact of a scheme on the surrounding road network. RSIA and RSA both work to improve the safety performance of new roads and existing roads that require modifications due to projects or proposals. Both have consequences for the design and layout of any project.

For Traffic and Transport Assessment, the appropriate and correct implementation of these instruments is essential in the preparation of planning proposals. Standards and Advice Notes on these processes are available from the NRA Design Manual for Roads and Bridges available for download from <http://nrastandards.nra.ie>

## **2. SUBURBAN AREA POLICIES**

From the Authority's point of view, national road junctions are extremely important thus the impact of development generated traffic (residential and commercial) must be controlled so as not to unduly interfere with the strategic movement of goods and



services to/from the Cork region as indicated in chapter 3 and 5 of the Draft City Development Plan. The following issues arise in chapter 14:

**a) Tivoli**

Tivoli has an extensive south facing waterfront and the commuter rail line runs along its northern boundary and is in close proximity to the N8/M8. The CASP Update identifies it as an area with future potential for residential and employment uses. The Authority agrees that the preparation of a local area plan is required in order to determine a development strategy, which should be linked to not only the programme for relocation of the Port, and the likely timetable for lands becoming available for redevelopment but also significant road and public transport improvements. The Authority requests consultation during the preparation of this local area plan.

**b) Blackpool/Kilbarry**

The Authority has previously highlighted concerns with regard to the expansion of the "District Centre" zoning in the North Blackpool Local Area Plan which could have serious repercussions for the national road network in this area. The Authority has and would still highlight that, in the context of the N20; a revised strategic response to access within the local area plan area needs to be developed in consultation with the Authority. This is now especially appropriate given the proposed scale of development proposed under the "District Centre" zoning. This revised approach would seek to counter an over-reliance on the national primary road to cater for the locally generated development traffic arising from the local area plan and to avoid a proliferation of inappropriate accesses to the N20. As yet no agreement between the Authority and the City Council has been reached as to a suitable traffic plan for the area which did not impact on the operational efficiency and capacity of the N20 national route.

The Authority advises that given the scale of development proposed in the District Centre it is essential that an appropriate transport assessment should be undertaken to determine the capacity of the local road network, the interface with the N20 and the impact of the extent of development envisaged in the plan area on the operational efficiency and capacity of the national route. The Authority also advises that the cumulative impacts of any proposed developments in the extended area need to be considered and that assessing the impacts of the local area plan alone may be insufficient.

**c) Mahon/ Jacobs Island**

The Authority has serious concerns in relation to significant further non- residential development occurring to the south of the N40 interchange as proposed originally in the Mahon Local Area Plan, under the recent variation of current development plan and now in the current Draft Development Plan.

Those concerns can be summarised as follows:

Jacob's Island is a residential development area physically separated from Mahon by the N40 Mahon Interchange. Due to this physical separation there are very real transport impediments to providing sustainable transport solutions to development on Jacob's Island and therefore resultant local trips would be loaded onto the national road interchange. The Authority's understanding was that the City Development Plan and also the ethos of the Mahon Local Area Plan was that the appropriate land use strategy for Jacob's Island was for residential use with local services only.

It is also our understanding that analysis by the Council Planning Department using the data included in the Mahon Strategic Transport and Traffic Assessment and subsequent *Jacob's Island Addendum*, indicated that the inclusion of additional non-residential uses would:

- be contrary to national transportation policy, in that development would be car-borne and not support the achievement of smarter travel targets or support investment in public transport due to high car usage rates which would apply to offices on Jacob's Island.
- have an adverse impact on the Mahon Interchange and the N40;
- undermine the overall development potential of Mahon due to the adverse impact on the Mahon Interchange;
- undermine the case for rapid transit to Cork.

It is also a concern, that there has been no scenario testing of the impact of this proposed non-residential development proposed on the network especially the national road infrastructure.

The Authority would highlight that:

- Access to the Jacobs Island area is highly reliant on the Mahon Junction and N40.
- There is limited availability of public transport to the subject site to offset the significant reliance on private car borne trips which will be generated.
- The proposed non residential land uses are dependent upon a car borne catchment utilising the N40.
- There is already a significant supply of land with an employment zoning objective within Mahon capable of accommodating employment in excess of the employment targets for Mahon to 2031.
- A quantum scale of retail / commercial development has been assessed and refused by Bord Pleanála at this location.
- Outstanding permission exists for commercial development including 1200sqm of retail space (PL28 .232275)

This appraisal would also coincide with inclusions in the NTA submission to the Draft LAP (dated 16<sup>th</sup> September 2013) which indicated the inappropriateness of locating further development south of the interchange due to

- Its physical separation from Mahon by the N40 Mahon Interchange and the resultant local trips which would be loaded onto the interchange;
- 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.

The Authority would also support this view. It is therefore the Authority's opinion that justification for an increase in quantum of non-residential uses in Jacobs Island has not been established and/or justified.

The Authority considers that the inclusion of the location, nature and size of the development proposed under Section 2.25 and in particular objective ZO20, ZO9 and associated mapping no. 6, with its underlying objective for 15,000 sq m science and technology activities, will give rise to unnecessary local traffic generation on the strategic national road network which would be contrary to the provisions of official policy and therefore at variance with the provisions of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012).

The Authority therefore considers that having regard to the strategic importance of the junction and national road network at this location, the reliance on the Mahon Junction for all access to and from Jacobs Island and the particular sensitivity the junction has to additional traffic loading, that the proposed development objectives should be omitted.

### **3. CONCLUSION**

The Authority is aware that Blackpool/ Kilbarry and Mahon are the major development opportunities in the city suburbs. Tivoli and the Tramore Rd/ Kinsale Rd also represent future redevelopment and intensification opportunities. In view of the location of these areas, the Authority respectively points out that although a requirement has been identified for the development of these lands that this local demand cannot be developed at the determinant of eroding or undermining the investment in national infrastructure which is required to service the Country's major inter-urban and inter-regional transport requirements that underpins Ireland's return to competitiveness. Policies in growth areas should be adopted so as to avoid the undermining of the strategic transport function of national roads, by measures intended to cater for the needs of local traffic and local development related traffic, which should more appropriately be addressed within the framework of providing an adequate local transportation infrastructure as outlined in chapter 5 of the Draft Development Plan and in the interests of the implementing a sustainable economic strategy as outlined in chapter 3.

The Authority is willing to meet to further discuss the issues raised in this correspondence with members of the Executive at your earliest convenience as an aid to devising an appropriate and sustainable development strategy for Cork City.

Yours sincerely

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17<sup>th</sup> June 2013

## **Re: Cork City Development Plan Review – Section 11 Consultation Document**

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
- 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.

## **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 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 within 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 current parking provision and the parking standards that apply to new developments. In this regard, the Authority would support the development of common parking standards for the Metropolitan Area and a zone-based system, based on centrality within the metropolitan area and public transport accessibility. 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
<b>Cork City Council</b>	14.1%	1.5%	67.2%	6.3%	2.3%	6.7%	0.7%	0.7%
<b>Cork City Centre (10 EDs)</b>	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, a clear definition of their retail catchments, 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, with corresponding reductions in bus journey times;
- 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.

## 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:

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;
- Maximum 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)
  - Design Manual for Urban Streets (DTTAS / DoECLG, 2013)
- 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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**DRAFT**



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17<sup>th</sup> 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. This submission is consistent with that sent 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 to 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 the City Council area. Emphasis would be best placed on those locations within the City Centre, including Docklands, and defined development corridors.

### **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 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 accessibility

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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 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;
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- 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.

### Car Parking

This 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

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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.

### Travel Patterns and Mode Splits

As referred to above, the Metropolitan Area is characterised by a dispersed pattern of journeys to work, with correspondingly high car mode shares (>75%) applying at most significant employment destinations, including the city council area, 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".

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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.~~

### 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.

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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 Areas' 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:
  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;

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- 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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Mr Patrick Ledwidge,  
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Cork City Council,  
City Hall,  
Anglesea Street,  
Cork

17<sup>th</sup> 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;
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  - 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

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

## DRAFT 2

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;

## DRAFT 2

- 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



**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, 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 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:

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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 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%.

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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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## Conclusions and Recommendations

### Conclusions

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

13<sup>th</sup> June 2014

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

Dear Mr Ledwidge,

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

The Authority's detailed 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 Council, NTA and other agencies in transport infrastructure,
  - improved and more effective public transport services,
  - improved accessibility to jobs and services, and
  - reduction in car dependency.

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

- The Core Strategy
- Employment location, Employment Intensity and the Overall Strategy for Economic Development
- Transport and Mobility, Transport Investment, Parking Policy/ Parking Standards



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### The Core Strategy

#### Chapter 2 – Core Strategy

##### ***Prioritisation of Residential Development Locations***

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 level 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 and the delivery of improved and more effective public transport services.

##### ***Residential Density***

In regards to housing density, densities could also 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.

Need to emphasise the need for appropriate densities to be determined through a process which combines the prioritisation of development locations or corridors with the prioritisation of investment in public transport infrastructure/ services and this could be addressed through the preparation of local area plans.

##### ***Employment location, Employment Intensity***

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 close alignment with transport policy and transport investment prioritisation 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.

##### ***Jacobs Island (additional points)***

Serious concerns in relation to the location of significant additional development, particularly non-residential development to the south of the Mahon Interchange, in particular,

- Its physical separation from Mahon by the N40 Mahon Interchange and the resultant local trips which would be loaded onto the interchange;
- 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;

## DRAFT 1

- 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.

In addition, the following points in the Mahon STTS (Jacobs Island Additional Development Assessment) are noted:

- *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.*

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

### **Chapter 5 – Transportation**

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

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

This needs to be undertaken on the basis of clearly defined objectives relating to mode split for a range of trip purposes; accessibility to key development areas and strategic economic assets such as airport and port facilities; the use of and protection of transport assets for clearly defined purposes (public transport corridors, national roads for strategic traffic, etc.).

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

Critical to the achievement of this objective will be 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 local connectivity/ permeability which maximise the attractiveness and utility of public transport, walking and cycling over the use of the car, for a range of trip purposes.

This will 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.

## DRAFT 1

### ***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 is informed by an agreed programme of investment in public transport infrastructure for the City, over the period of the development plans and beyond, which complements the existing 5 year Transport Investment Framework agreed with the NTA and the principles which underpin it.

Whilst the delivery of this infrastructure and the associated ability to improve public transport services will be contingent on the availability of requisite funding, a greater degree of certainty on the location of public transport investment priorities, in combination with complementary detailed statutory plans at the local level could provide the basis for the application of parking standards (within 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.

I trust that the views of the Authority will be taken into consideration in the finalisation of the Plan.

Yours sincerely,

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**Hugh Creegan**

***Director of Transport Investment and Taxi Regulation***



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

17<sup>th</sup> June 2014

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

Dear Mr Ledwidge,

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

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

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

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

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

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

## **Chapter 2 – Core Strategy**

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

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

### ***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 this in itself would not take sufficient account of current transport objectives currently being developed. Such an approach could serve to undermine the basis for future investment in public transport infrastructure and services, and the ability to deliver improved levels of service in existing priority investment corridors.

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

### ***Employment location, Employment Intensity***

The Authority would support the prioritisation of future employment development on the basis of clearly defined employment types combined with associated 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 has previously highlighted and continues to have particular concerns with the Draft Plan's provision for up to 15,000 sq.m of mixed use development at Jacobs Island, including business and office space, the following basis:

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

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

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

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

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

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

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

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

This needs to be undertaken on the basis of clearly defined objectives relating to mode split for a range of trip purposes; accessibility to 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 need for and 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.

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

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

## **Key Points**

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

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

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

Yours sincerely,

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

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

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

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

### ***Residential Density***

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

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

### ***Employment location, Employment Intensity***

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

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