

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

21<sup>st</sup> January 2015

## **Re: Proposed Amendments to the Draft Cork City Development Plan 2015-2021**

Dear Sir,

The National Transport Authority (the Authority) welcomes the referral of the proposed amendments to the draft City Development Plan. The Authority provides the following comments on the proposed amendments for the Council's consideration.

### **Chapter 2 – Core Strategy**

#### ***Residential Capacity - Proposed Amendment Ref. 2.2***

It is noted that the indicative capacity of land available for residential development in Cork City has been reduced by around 550 units, which is now referred to as being close to the target set in the RPG's for the South West. Against the RPG's and Draft Development Plan's overall objective of reversing the long term decline of the City's population and enabling the greater consolidation of the Metropolitan Area's population growth within the City area, it is of some concern that the indicative capacity for the city for residential development has been reduced.

In general, the achievability of the Draft Plan's sustainable transport objectives will be contingent on the greater consolidation of Metropolitan Area-generated development within the City and its environs, with a particular emphasis on the City Centre, Key Development Areas and designated transport corridors. To this end, the achievement of RPG's target with in the City Council area should, as a minimum, be reflected in the Development Plan.

#### ***Objective 2.1 Residential land management strategy – Proposed Amendment Ref. 2.2***

The following change is recommended to Objective 2.1:

*An active residential land management strategy will be developed to promote residential and ancillary uses on lands identified for development. Cork City Council will identify barriers to development and to the sustainable management of the associated demand for travel from these*

*developments and will take appropriate action to mitigate these, taking into consideration the measures in Construction 2020, public transport services and transport investment priorities, including those funded under the Cork Metropolitan Area Five Year Investment Framework 2013-2017.*

**North and South Docklands – Proposed Amendment Ref. 2.3; Tivoli – Proposed Amendment Ref. 2.4**

The Authority would support the proposed amendments and would welcome the opportunity to work with the City Council and other stakeholders in the preparation of any local area plan/ masterplans for this area.

**Figure 2.1: Core Strategy – Proposed Amendment 2.5**

In regards to the inclusion of “an objective to prepare local area plans in respect of public transport corridors”, the Chief Executive’s Report, stated that “it is considered too early to determine where local area plans would be required”, with a recommendation that objective 5.2 would be strengthened to state that the Development Plan will be varied, if necessary, to account for changes arising from the completion of corridor studies”.

If the defined public transport corridors are not to be included in the Core Strategy, in Figure 2.1, it is strongly recommended that the Core Strategy includes, in its Development Strategy, a clear reference to the development of Transport Corridors connecting the City Centre with the Key Development Areas, within which future investment in sustainable transport infrastructure and improved public transport services will be focused, providing a stronger basis for development consolidation at higher densities within the City Centre, strategic transport corridors and key development areas.

**Chapter 5 – Transportation**

**Contents – Proposed Amendment Ref. 5.1**

Under ‘Public Transport’, include the word ‘Services’ after ‘Rail’.

**Modal Split – Proposed Amendment Ref. 5.2**

Second Paragraph: The first sentence needs to be clarified, the following is suggested:

*An integrated transport system, with complementary land use policies can deliver a broader range of transport options; reduce congestion and the economic and environmental cost of congestion; and reduce car dependency, whilst strengthening the basis for investment in sustainable transport alternatives.*

Second Paragraph: The following addition is recommended:

*“ ... 69% of people working in Cork City drive to work and a further 6% are driven to work as passengers ...”.*

Second Paragraph: The following change to the last sentence is recommended:

*However, the share of total travel by car, when the journey to work / education of those both living and working in Cork City is considered, falls to just 45%, reflecting the impact that compact cities, where journeys are short, can have on travel patterns and mode choice.*

### **Objective 5.1 – Proposed Amendment 5.3**

The following change is recommended, to Objective A:

*Provide for the greater consolidation of development within the City Centre, Docklands, Key Development Areas and Strategic Corridors, facilitated through the integration of land use and transport planning, investment and service provision.*

The following change is recommended, to Objective I:

*Provide better connectivity and reduce severance at the local level, to facilitate access to local services, including public transport services, schools, shops, etc. by walking and cycling and reduce the need for car use, both for local and non-local trips.*

The following change is recommended, to Objective K:

*To manage the supply and pricing of parking in the city in order to bring parking policy and parking management into greater alignment with other land use and transport policy objectives and transport investment priorities.*

The following change is recommended, to Objective O:

*“To work closely with transportation stakeholders ...”*

### **Land Use / New Development - Proposed Amendment Ref. 5.4**

First Paragraph – The following change is recommended to the first sentence:

*The provision of sustainable transport alternatives is contingent on supportive land use patterns.*

Second Paragraph – The following change is recommended:

*A second key component is to provide for the location / consolidation of trip-intensive land uses in a manner which enables the optimal use of existing public transport assets and provides the basis, in demand, for further investment in sustainable transport infrastructure and public transport services.*

The following change is proposed, to Objective 5.x Transport Assessment:

*... the assessment shall demonstrate how sustainable transport patterns can be achieved by the development.*

### **Workplace and School Travel Planning – Proposed Amendment Ref. 5.5**

The following changes are recommended:

~~During the lifetime of the Development Plan,~~ *The Smarter Travel Workplaces Programme, which is managed by the National Transport Authority on behalf of the Department of Transport, Tourism and Sport, continues to engage with a number of large employers in the Cork area, in the development and implementation of workplace travel plans ...*

*Travel planning for schools continues to be promoted through the Green Schools Travel Programme, which is managed by the National Transport Authority on behalf of DTTAS.*

In addition to *Achieving Effective Workplace Travel Plans – Guidance for Local Authorities*, it is recommended that this section include reference to the following National Transport Authority guidelines:

- Workplace Travel Plans – A Guide for Implementers
- Toolkit for School Travel

### **Area-Based Strategies – Proposed Amendment Ref. 5.6**

The following addition is proposed, to the second paragraph:

*... as well as directing major new development to areas where public transport options are already available and areas that have been prioritised for investment in public transport infrastructure and service improvements ...*

Include the following at the end of the second paragraph:

*During the lifetime of the Development Plan, investment in public transport and other sustainable transport infrastructure will be primarily focused on the City Centre and a number of strategic transport corridors connecting the City Centre with the Key Development Areas.*

In the paragraph titled “Strategic Transport Corridors, the following change is recommended, to the proposed amendment:

*... to encourage the consolidation of development at higher densities, within strategic public corridors , connecting the City Centre with the Key Development Areas, thus providing a stronger basis in demand, for the improvement in the frequency, reliability and integration of public transport services, thus enabling the use of public transport for a range of trip purposes within these corridors and across the wider Metropolitan Area.*

Objective 5.x Strategic Transport Corridors – The following change is recommended:

*Cork City Council has commissioned studies ... with the greatest potential to maximise modal shift with regard to return on investment to public transport, walking and cycling and in doing so, maximising the return on investment. Upon completion, landuse strategies for each corridor will be prepared, as set out in Objective 5.x, below.*

Objective 5.x Landuse Strategies for Key Public Transport Corridors – the following changes are recommended:

*To develop landuse strategies that ~~encourage higher density uses~~ provide for the consolidation of development at higher densities along key public transport corridors ~~where feasible~~.*

During the lifetime of the Development Plan ... focused on the City Centre and ~~these~~ strategic corridors which connect the City Centre with the Key Development Areas.

General Comment on 'Landuse Strategies' – It is not clear what is meant by 'Landuse Strategies', how they would relate to, for example, the preparation of local area plans, and how they would relate to the scope of the Strategic Corridor Studies, currently being undertaken, and the implementation of the transport infrastructural measures identified in these studies.

#### ***Walking and Cycling – Proposed Amendment Ref. 5.7***

The following changes are proposed:

Second Paragraph: Walking and Cycling and ~~forms~~ *modes* of transport ...

Third Paragraph: ... (~~unless however~~, topography can pose a significantly limiting factor)

...The National *Cycle Policy* Framework ...

#### ***Public Transport – Proposed Amendment Ref. 5.9***

To be completed.

Under 'Objective 5.x Support Bus Network Improvement, the following additions are proposed:

*... provide properly designed and located bus turning facilities to facilitate the delivery of a legible and reliable network of bus services ...*

#### ***Integration and Multi-Modality – Proposed Amendment Ref. 5.15***

It is recommended that this objective includes:

*... the improvement of bus access to rail stations, to facilitate bus/ rail intermodality.*

#### ***Review Car Parking Standards – Proposed Amendment Ref. 5.19***

The following addition is recommended, to Objective 5.x Review Parking Standards:

*... in support of a range of sustainable land use and transport objectives ~~sustainable transport~~.*

### **City Centre – Proposed Amendment 5.20**

The following addition is recommended to paragraph “City Centre”

*... The provision of alternative transport options will be increased considered to reduce the demand for in combination with the reduction in the demand for parking.*

*... This will be considered further in respect of a parking strategy for the City Centre and District Centres within the City.*

The following change is recommended, to Objective 5.x Parking at Suburban District Centres:

*To explore the potential for the introduction of parking management measures, including the potential for charges parking charges at suburban district centres in conjunction with the National Transport Authority in support of sustainable travel and to reduce traffic congestion, as part of a parking strategy for the City Centre and District Centres within the City, in support of improved accessibility by public transport, walking and cycling and to reduce car-based congestion. In doing so, the Council will consult with a range of stakeholders, including the National Transport Authority.*

### **Revise City Centre Parking – Proposed Amendment Ref. 5.21**

The following changes are proposed:

*As set out in Table 5.x, 57% of those working in the City Centre drove to work travelled by car, in 2011. It is intended to enable the reduction reduce of this percentage ...*

### **Park and Ride – Proposed Amendment 5.22**

The following change is proposed:

*Action 14 of the Transport Policy for Ireland 2009-2020 (Smarter Travel – A Sustainable Transport Future) includes “Provision of park and ride facilities at the edge of major urban centres and at important public transport nodes, with efficient transport connections to the urban centre” is supported by Action 14 of the NTA’s Smarter Travel Plan.*

### **General Note on the application of Integrated Land Use and Transport Planning in the context of Transport Investment**

In accordance with Section 13 of the Dublin Transport Authority Act 2008, the National Transport Authority was required to prepare an Integrated Implementation Plan (for transport) for the Greater Dublin Area. This was required to comprise of an Infrastructure Investment Programme; Actions to be taken to ensure the effective integration of public transport infrastructure; an Integrated Service Plan; and Actions to be taken to ensure the effective integration of public passenger transport services. In preparing this Plan, the Authority considered it appropriate and necessary to address the inter-related roles of land use planning and transport provision. This document can be found on the NTA web site:

[http://www.nationaltransport.ie/wp-content/uploads/2011/12/Integrated\\_Implementation\\_2013-2018.pdf](http://www.nationaltransport.ie/wp-content/uploads/2011/12/Integrated_Implementation_2013-2018.pdf)

## **Chapter 13 – City Centre and Docklands**

### ***Objective 13.23A Development of Docklands (Proposed Amendment Ref. 13.9); Objective 13.25 South Docks (Proposed Amendment Ref. 13.10)***

The Authority would support the inclusion of this new objective as a basis for delivering a stronger focus on the accommodation of the Cork Metropolitan Area's future population and employment growth within its most central locations. The Authority would also agree with the sequencing of development within the Docklands area, from the City Centre outwards, which would allow for the optimal utilisation of existing transport assets, including public transport services, serving the City Centre. The achievement of a greater concentration of trip demand within the most central areas of the Metropolitan Area is considered to have a critical bearing on the ability to deliver more effective public transport services, in reducing the need to travel and in reducing car dependency, and as such, would support the basis for future investment in sustainable transport infrastructure and services.

## **Chapter 14 – Suburban Area Policies**

### ***Jacobs Island***

Notwithstanding the statutory issues regarding the submission of comments / observations with respect to the proposed amendments to the Draft City Development Plan, the Authority reiterates the concerns outlined in its previous submission (dated 17<sup>th</sup> June 2014) on the Draft Plan's provision for non-residential development south of the N40 interchange at Jacob's Island.

### ***Tivoli - Proposed Amendment Ref. 14.1***

In the context of a relocation of port and related activities, the Authority would support the Council's objective to prepare a local area plan for Tivoli, with a strong focus on:

- Walking, cycling and public transport use;
- The application of development densities which support the investment in and delivery of high quality public transport services;
- Internal layouts and external access which enable the use of non-car modes for local and non-local trips;
- Good access to the City Centre and Docklands areas;
- The optimal utilisation of existing public transport assets;
- A phasing of development which supports the above objectives.

The relationship between, for example, residential development density, local level accessibility and associated public transport service level potential, will have a critical bearing on the extent to which this area can be developed on a less car-dependent basis, than existing suburban locations within the City. In this regard, the density gradient within the LAP lands, within a relatively modest overall residential density of 50 dwellings per hectare (Amendment Ref. 2.2 (Table 2.3)) would need to be carefully considered.

**Proposed Amendments to Mapped Objectives**

***Map Change M1 – Tivoli***

See comments, above, under Ref. 14.1.

***Map Change M16 – Mahon Industrial Estate***

The proposed change from ‘Residential, Local Services and Institutions’ to ‘Business and Technology’ runs counter to Section 14.4 of the Chief Executive’s report, which states that “the employment targets for Mahon for the next 10 years can be met by lands zoned in the Lough Mahon Technology Park and lands on Jacob’s Island and Mahon Industrial Estate are not required for employment development”, and the Draft Plan’s Section 14.3 which emphasises the need for a greater mix of uses, including more residential development in Mahon.

The associated additional employment growth potential could also be considered to run counter to the Draft Development Plan’s Objective 13.

It is noted from the revised Table 2.3 (Amendment Ref 2.2) that the total indicative residential capacity has been reduced by 550 units, with an overall reduction for the City of 547 units. Against the RPG’s and Draft Development Plan’s overall objective of reversing the long term decline of the City’s population, it is of some concern that the indicative capacity for the city, for residential development, has been reduced. Clarification on whether the reason for this reduction can be primarily attributed to Proposed Amendment M16 would be welcomed.

The Authority requests that the foregoing comments are taken into consideration in the final adoption of the Plan and would be available to discuss issues arising from the comments made.

Yours sincerely,



**Michael Mac Aree**  
Head of Integrated Planning