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Re: Proposed Amendments to the Draft Cork County Development Plan 2013

Dear Sir,

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

Proposed Change No. 2.3

Regarding the proposed amendments' references to 'net hectares' and 'net densities', it is recommended that a fuller explanation of this is included, with reference to the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas.

In regards to the residential densities implied in Table 2.2 and Table A.1 under the *Net Ha. Estimated Requirement* and the residential densities specified in Appendix G, the Authority would reiterate the recommendations presented in its previous submission on the Draft Development Plan (26th February 2014), under *Housing Density*.

Proposed Change No. 6.5

The Authority would recommend the following changes to Objective EE 4-4:

Promote the development of industry in appropriate locations through the Local Area Plans with:

- Good access for heavy goods vehicles to the National Road network **for goods trip intensive industrial uses**, without the need to travel for long distance through urban areas;
- Access to public transport and facilities for walking and cycling **for employment intensive industrial uses**;

Proposed Change No. 10.4

In regards to the proposed change and general content of Paragraph 10.2.21, the Authority would reiterate the views set out in its previous submission on the Draft Development Plan under *Consolidation of Development within Public Transport Corridors and Provision for Bus Priority*.

Ultimately, the ability to deliver an improved level of public transport service within the Metropolitan Area over the period of the Plan and in the longer term will be contingent on the Council's prioritisation of development within public transport corridor locations and (through the mechanism of the local area plan or special local area plan), the application of development densities, land uses, parking standards and local connectivity/ permeability which maximise the attractiveness and utility of public transport, walking and cycling over the use of the car, for a range of trip purposes.

The Authority would also reiterate the importance of the Council's role in providing an efficient operating environment in which bus services can operate on an efficient and reliable basis and provide a more competitive alternative to the car, win additional market share and contribute to achieving the Draft Plan's sustainable transport objectives.

Proposed Change No. 10.5

In regards to Objective TM 2-4 (a) and (b), the Authority would agree with the objective of improving services within the Cork South Environs area and within the City/ Environs and Metropolitan Area generally. As stated above, the achievement of this, will be primarily contingent on a coordination of land use and transport planning/ investment policies which support this objective.

Under (b), the Authority would also recommend the following changes:

Promote bus service improvements broadly in line with Table 10.1 and to generally encourage the enhancement of service provision in tandem with planned population **and employment** growth.

Proposed Change No. 10.13

In regards to Appendix C Table 1a (note 2 and note 4) and the proposed changes to it, the Authority would reiterate the concerns expressed in its previous submission on the Draft Development Plan under *Transport Demand Management, Parking Policy/ Parking Standards and Consolidation of Development within Public Transport Corridors*.

In the case of both Note 2 and Note 4, as a key instrument of transport demand management, the manner in which maximum parking standards are applied needs to be directly related not only to existing public transport attributes, but also to a coherent approach to development prioritisation, development density and transport investment prioritisation. The above argument also applies to the use of mobility management plans / associated mode split targets as a basis for determining a sub-maximum level of parking provision.

Proposed Change No. 15.7

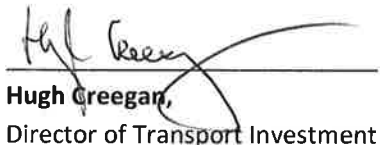
In the revised Table 15.2, it is recommended that the Douglas (Local Roads/ Public Transport Upgrade) be included in both the Short Term and Medium/ Long Term columns.

In Appendix X, the following changes are recommended under *Transport*:

15. The change in **trip making patterns and modal share split** over the Plan period ...
16. The change in the **level pattern, capacity** and frequency of public transport services ...

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,



Hugh Greegan,

Director of Transport Investment and Taxi Regulation