

Development Plan Submissions
Strategic and Economic Development
City Hall,
Anglesea Street,
Cork.

4th October 2021

Re: Draft Cork City Development Plan 2022-2028

Dear Sir/Madam,

The National Transport Authority (NTA) welcomes the referral of the draft City Development Plan 2022-2028 (Draft Plan) and submits the following comments for the Council's consideration.

The following observations are made on the Draft Development Plan on matters which are considered to be of importance to the integration of land use and transport planning in general; complementarity with CMATS and its implementation; and to the associated requirement to consolidate future development in a manner which supports a reduction in car dependency and supports investment in sustainable transport alternatives.

In this regard, the NTA submission focuses on the following matters:

1. The role of CMATS as referenced in the Draft Plan's Strategic Context (Chapter 1)
2. The Distribution of Growth as set out in the Core Strategy's Growth Strategy (Chapter 2);
3. The Draft Plan objectives in relation to Sustainable Neighbourhoods, Compact Growth and Sustainable Residential Development & Residential Density (Chapter 3, 11);
4. The Draft Plan's objectives in relation to the status of CMATS and its implementation, mode share targets, Active Travel and Area Based Transport Assessment (Chapter 4);
5. The location of employment growth and the Draft Plan's Strategic Employment locations (Chapter 7);
6. Retail Planning and the Draft Retail Strategy (Chapter 7);
7. The Draft Plan's objectives relating to the Key Growth Areas (Chapter 10); and
8. The Draft Plan's objectives relating to Car & Cycle Parking and Parking Standards (Chapter 11).

1. Strategic Context (Chapter 1)

In terms of the Strategic Context for the Draft Plan, the NTA welcomes the Draft Plan's early reference to CMATS, highlighting its importance in informing the integration of land use and

transport planning, its complementarity with the Cork MASP and the basis it provides for the Draft Plan's transport investment priorities. The importance attributed to CMATS is also reflected in the Core Strategy's Strategic Objective SO3 (Transport and Mobility). The Cork Metropolitan Area Strategic Plan (MASP) provides the basis for the integration of land use and transport planning at Metropolitan Area level and CMATS represents an integral part of that process.

Recommendation

It is recommended that the following supporting information is added to section 1.23.

CMATS sets out a framework for the planning and delivery of transport infrastructure and services to support the Metropolitan Area's development in the period up to 2040. It provides a coherent transport planning policy framework and implementation plan, around which Cork City Council, Cork County Council and other agencies involved in land use planning, transport investment, environmental protection and the delivery of housing, employment development and other infrastructure can align their investment priorities.

2. The Distribution of Growth as set out in the Core Strategy's Growth Strategy (Chapter 2)

Strategic Objectives for Growth

The NTA supports the Draft Plan's inclusion of objective SO3, which supports the integration of land use and transport planning, to increase active travel and public transport usage and enabling delivery of the key transport projects in CMATS.

Recommendation

It is recommended that the following is added to SO3: The delivery of the key transport projects in CMATS will be supported by land use policies and the phasing of development which is compatible with those in CMATS' land use outcome.

City Consolidation and Expansion (page 47)

The NTA supports the Draft Plan's objective to deliver compact growth through the consolidation and expansion of certain areas within and adjoining the existing City.

Recommendation

In relation to the seven areas identified for consolidation and expansion, it is recommended that further explanation is provided in the Core Strategy Chapter as to how these areas were identified as being of particular suitability for this purpose.

Figure 2.20 Core Strategy Map

It is recommended that 'Park and Ride' is changed to 'Park and Ride – *Indicative Locations*', bringing it into line with CMATS.

Figure 2.21 Growth Strategy Map 2022-2028

The NTA notes with some concern, the location and scale of a number of Tier 1 and Tier 2 zoned sites, which, by virtue of their peripheral location are not likely to benefit significantly from the measures identified in CMATS for implementation within the period of the Development Plan, or within CMATS overall implementation time frame. These would include certain sites on the southern fringe of Douglas/Rochestown, Glanmire, Blarney and Tower. Under the circumstances, it is difficult to understand how these sites could support the basis for the consolidated growth of the city, based on accessibility to high quality public transport services and the associated application of higher development densities than have hitherto applied to the adjacent established residential areas. This concern is corroborated by paragraph 11.235 of the Draft Plan which states that '*Parking Zone 3 covers the Urban Towns of Blarney, Tower and Glanmire and the outer suburb of Rochestown. Although these areas have been identified for public transport improvement, the interventions currently being considered are not at a scale envisaged to allow for a more substantial reduction*'.

Recommendation

It is recommended that Tiered zoned sites identified for potential development within the Development Plan period are subject to further detailed transport assessment, as part of a Local Transport Plan (based on the ABTA approach set out in NTA/TII guidance), which the NTA recommends, should be undertaken for each of their associated Key Growth Areas. Consistent with the section 4.7 and Objective 4.3 of the Draft Plan, development should not be considered where it cannot be demonstrated that tiered zoned lands will benefit from sustainable transport improvements associated with the implementation of CMATS within the development plan period.

Table 2.3 Growth Strategy 2028 (Tier 1&2)

Based on the stated size of the underutilised site (net ha) and the potential Tier 1&2 yield, the implied densities per (net) hectare would appear to range from 21 and 22 dph in North East Suburb and Tower to 155dph in City Docks, with most values in the 'City Suburbs' and 'Urban Towns' being less than 30 dph. This table requires further explanation in relation to the implied residential densities applicable and needs to be reconciled with the density values set out in Table 11.2 (Density and Building Heights Strategy).

Recommendation

Given that most of the anticipated residential development with the Plan period is expected to occur within the Tiered zoned lands, it is recommended that clarification is provided on the relationship between the potential yields specified in Table 2.3 and the density values set out in Table 11.2.

Objective for City Growth – Table 2.5 Summary of Key Objectives

In relation to Hinterland Settlements, it is noted that a growth of 15% is provided for, whilst also referring to the application of 'sustainable growth targets' as a key deliverable. On the other hand, a value of 10% is specified over the lifetime of the Plan, in Objective 10.9 (Hinterland Settlements).

Recommendation

The apparent discrepancy between Table 2.5 and Objective 10.9 needs to be explained.

3. The Draft Plan objectives in relation to Sustainable Neighbourhoods, Compact Growth and Sustainable Residential Development & Residential Density (Chapter 3, 11)

Objective 3.4 Active Growth (k)

The NTA would support the provisions of Objective 3.4 (k) which provides for review and updating of land use designations, where new sustainable transport infrastructure is planned.

Recommendation

The review and updating of land use designations would be best informed by the preparation, at the wider area (Key Growth Area) level, of ABTAs, based on the approach set out in NTA/TII guidance.

Objective 11.1 (Sustainable Residential Development) and Residential Density (Table 11.2)

The NTA would support the Draft Plan's approach to Sustainable Residential Development and the promotion of the 15 minute city concept. The higher density ranges now being proposed across the City, Fringe/Corridor/Centre and Inner Urban Suburbs is also supported in principle, but with the qualification that the specific density proposed and the case to be made, generally, for the development of a site in any of these areas needs to be determined on the basis of a detailed examination of accessibility levels by public transport and to services at the local level.

Recommendations

In addition to the case to be made for the use of ABTA, as previously stated, implicit in such an approach would be the identification of accessibility levels based on PTALS and ATOS, as referenced in NTA/TII ABTA guidance. It is recommended that this aspect of ABTA is referenced as an influencing factor in determining residential density.

In relation to the density ranges set out in Table 11.2, some explanation is required as to why the lowest 'Lower Target' for a defined Inner Urban Suburb location (in Blarney) is lower than the general value for Outer Suburbs, which includes locations such as Tower and other parts of Blarney itself.

4. The Draft Plan's objectives in relation to the status of CMATS, CMATS' mode share targets, Area Based Transport Assessment, Travel Demand Management, Mobility Management Plans, Universal Design (Chapter 4, 7)

Section 4.13

Recommendation

Insert the following text: CMATS is supported ... and has been adopted ***and agreed between the National Transport Authority and the other key stakeholders – Cork City Council, Cork County Council and Transport Infrastructure Ireland*** and as such

Reference to Mode Share Targets and CMATS (Table 4.1, sections 4.4 and 4.5)

It is noted that Table 4.1 and Table 4.2 refer to ‘CMATS Modal Share … Targets’ and section 4.5 refers to the ‘targets that CMATS was modelled on’. The mode share figures are presented in Chapter 18 of CMATS as Strategy Outcomes, they are not presented as mode share targets and should not be quoted as such in the Draft Plan. As Strategy Outcomes, they reflect the Strategy development process, including the assumed land use patterns as they relate to the distribution of growth up to the horizon year 2040.

However, the Draft Plan has correctly differentiated between the Metropolitan Area, implicit in the CMATS outcome, and the higher non-car mode shares that would typically apply in its largest urban agglomeration – Cork City. The NTA would therefore agree with the assertion in section 4.5, the ‘ambition of Cork City Council to exceed the targets (CMATS outcomes) set for sustainable transport modes’.

Recommendation

Reference to ‘Targets’ in Table 4.1 and section 4.5 should be changed to ‘Outcomes’.

Table 4.2

Recommendation

The title of Table 4.2 should be changed to ‘CMATS Implementation’.

Cycling (section 4.29)

The NTA would agree that a higher cycling mode share ambition than the 4% referenced as a Strategy Outcome for the AM Peak should be aspired to in the Development Plan, as the City Council area contains the largest and most consolidated urban area within the Metropolitan Area and is expected to benefit from substantial investment in sustainable transport infrastructure which will positively impact on cycling, based on the CMATS Phased Implementation Plan and intended investment in cycling and walking infrastructure in the short term (up to 2025) through the NTA’s five year cycle plan.

Light Rail (section 4.62)

It is noted that section 4.62 refers to LRT being preceded by a high frequency bus service between Mahon and Ballincollig, consistent with CMATS’ Phased Implementation. The delivery of high quality bus services within the Development Plan period will be provided for through the implementation of BusConnects. The manner in which services are configured in the area corresponding to the LRT corridor, within the Development Plan period and beyond, is expected to be determined through the BusConnects network redesign process.

Suburban Rail (section 4.69)

Reference is made to ‘an examination of the potential for future development in the North West Corridor of the City such as Killeens. Killeens is currently defined as a Hinterland Settlement, is located adjacent to the N20 and does not fall within the local catchment of rail station currently proposed in CMATS, as part of the proposed investment in Suburban Rail.

Recommendation

Based on the current proposals for suburban rail, as presented in CMATS, It is recommended that Killeens is not referenced in the Development Plan as part of a potential future development area.

ABTA and Local Transport Plans

As stated in CMATS Chapter 15, the NTA would recommend the preparation of Local Transport Plans (LTP), particularly for urban settlements and large-scale development areas within the City and as such would recommend its inclusion as a development plan objective for all key Growth Areas. Whilst such an approach has been committed to in a number of the more central and higher development intensity Key Growth Areas, it is recommended that LTPs, based on the ABTA approach set out in NTA/TII guidance is applied across all Key Growth Areas identified in the Draft Plan.

The LTP would represent the lowest tier of the NPF's framework for the integration of land use and transport planning and the achievement of compact smart growth. It is intended that LTPs would:

- Maximise the opportunities for the integration of land use and transport planning;
- Assess the existing traffic, transport and movement conditions within the Plan area and in its wider context;
- Plan for the efficient movement of people, goods and services within, to and from the Plan area;
- Identify the extent to which estimated transport demand associated with local development objectives can be supported and managed on the basis of existing transport assets; and
- Identify the transport interventions required within the Plan area and in the wider context, to effectively accommodate the anticipated increase in transport demand.

Recommendation

The Draft Plan should include an objective which provides for the preparation of Local Transport Plans, based on the ABTA approach set out in NTA/TII guidance, for all Key Growth Areas identified in the Draft Plan.

Transport Demand Management

Whilst the management of transport demand is implicit in the Draft Plan's support for the implementation of CMATS, the application of maximum parking standards, the development of mobility hubs and the policy alignment between centrality, public transport accessibility and density, the NTA notes the absence of reference in the Draft Plan to the *Five Cities Demand Management Study*.

Recommendation

It is recommended that a commitment to the emerging recommendations of the *Five Cities Demand Management Study* is incorporated into the Draft Plan as an objective.

Mobility Management Plans (Objective 7.8)

Recommendation

Consistent with the provisions of Table 11.12 (Workplace Travel Plan Thresholds), Objective 7.8 should be amended as follows: 'In addition to traffic impact assessments, Cork City Council will encourage **require** all planning applications for new employment uses, or extensions to existing commercial premises, for 100 or more employees to prepare a mobility management plan ... '.

Provision for Universal Design

The NTA would emphasise the need for all future development used by the public to be accessible and usable by everyone, through provision for Universal Design.

The *National Planning Framework* recognises that social inclusion can be improved in the transport sector through, among other things, universal design. For example, *Technical Guidance Document M* of the *Building Control Regulations 2010* includes the objective to provide independently accessible means of approach to buildings.

The RSES for the Southern Region includes a Regional Policy Objective (RPO 181: Equal Access) that states:

It is an objective to promote disability awareness and improve equal access for all through universal design for public transport access, housing, social, cultural and recreational facilities and the public realm to improve quality of life equally for abled and disabled citizens in our Region. Local authorities should ensure that decision-making in relation to investment in infrastructure and facilities is informed by engagement with representatives of disability support organisations to ensure that perspectives of those they represent (e.g. wheelchair users) are understood and an appropriate level of environmental assessment.

Recommendation

The Development Plan should include an objective relating to Universal Design, to enable universal access. Making the external built environment accessible to all can facilitate and promote the greater use of public transport, walking and cycling. The use of universal design in the external built environment can benefit all within society including those with specific mobility issues and requirements. Objectives which promote universal design in the external built environment such as providing separate pedestrian entrances, the provision of dropped curbs and tactile paving will provide a safer and more attractive environment for all.

5. The location of employment growth and the Draft Plan's Strategic Employment locations (Chapter 7)

Strategic Employment Sites (including Objective 7.10)

In sections 7.40 and 7.41, it is noted that the Draft Plan has proposed four Strategic Employment Sites, namely CSIP, Cork Airport Ballincollig and Tivoli to meet office, manufacturing and light industry related needs. In addition, additional lands have been identified at seven locations as

potential employment sites in Blarney, Clogheen, Ballyvolane, Glanmire, South Link, Fairhill and Hollyhill.

Comment on the 4 Strategic Employment Sites

In relation to four sites already identified, three of these are located on the East-West Corridor, which as proposed in CMATS, will ultimately be served by a combination of high quality bus, Light Rail and upgraded Suburban Rail. The merits of these sites for employment development is recognised, subject to the preparation / review of detailed ABTAs, based on NTA/TII guidance for the sites themselves or as part of their corresponding Key Growth Areas.

In the case of the site at Cork International Airport, whilst it is expected to benefit from substantial improvements in accessibility, based the provision of high quality bus connectivity and a number of road network improvements within the wider area, the overall scale and intensity of employment uses provided for needs to reflect its relatively peripheral location within the City and on the proposed public transport network. As with the other sites, the preparation of an ABTA informing the future development of all aspects of the Airport area needs to be undertaken. Cognisance also needs to be taken of the need to provide for and protect access to the Airport in the operation of its core functions as an international gateway and part of the TEN-T core network.

Comment on the 7 Potential Employment Sites

In addition to the overriding recommendation, in the event that any of these sites are brought forward for development, that this should be informed by the ABTA undertaken for their corresponding settlement areas, the following comments on the individual sites apply:

Blarney Business Park Extension – the site would appear to focused only on access to the N20 and as such would not appear to be in accordance with the DOECLG *Spatial Planning and National Roads Guidelines* (2012) and is not likely to fall within the local catchment of any of the additional suburban rail stations proposed in CMATS. The NTA would not consider substantial employment development at this site to be consistent with the objective of consolidating development based on accessibility to high quality public transport and such would not be consistent with CMATS or Objective 4.3 of the Draft Plan. The identification of the site for development is also premature pending the identification of a preferred route for the M20.

Clogheen Business Park Extension & Land at Hollyhill – it would need to clearly demonstrated how these lands would be served by public transport, based on radial and orbital bus services and provide for connectivity with existing employment lands in this area so as to maximise accessibility at the local level for walking and cycling.

Ballyvolane (Garraneboy) – As above, it would need to clearly demonstrated how these lands would be served by public transport, based on radial and orbital bus services and provide for connectivity with existing and future residential development lands in this area so as to maximise accessibility at the local level for walking and cycling.

Glanmire (Killydonoghue) – the site would appear to be focused only on access to the M8 with no particular options for public transport accessibility, or walking/cycling accessibility at the local level and as such its development for employment would be inconsistent with the provision of the DOECLG *Spatial Planning and National Roads Guidelines* (2012), CMATS and Objective 4.3 of the Draft Plan. Whilst it is indicated that just '30% of the zoned land shall be developed for non-logistics

related employment uses', this still amounts to around 17ha and as such make it an unsuitable location for the level of employment, the site could ultimately accommodate.

6. Retail Planning and the Draft Retail Strategy (Chapter 7)

Objective 7.26 Strategic Retail Objectives - Metropolitan Area Joint Retail Study and Strategy 2021

It is noted that reference is made in the Draft Plan to the 'draft Cork Metropolitan Area Joint Retail Study and Strategy (2021) in a number of locations in this chapter, including the Spatial Economic Strategy, Objective 7.26, and section 7.82 which set out the retail hierarchy for the Metropolitan Area as a whole. It is stated in section 7.78 that it is '*currently being prepared on behalf of Cork City Council ... and it envisaged that upon completion, its findings will be incorporated into the adopted ... Plan*'.

It is of some concern that the Draft Plan's '*overarching policies*' and defined retail hierarchy have been determined in advance of the completion of the Retail Strategy. To date, the NTA has not been consulted during the preparation of Retail Strategy, but would welcome the opportunity discuss with the Council at the earliest possible opportunity and in advance of the Draft Plan Amendment stage.

As a significant generator of transport demand, the location, scale and type of retail development has a critical bearing on transport outcomes, in terms of mode split, trip distribution and the deliverability of sustainable transport infrastructure and services. The NTA would therefore favour the location of retail development in areas where it can be demonstrated that accessibility can be achieved by a range of transport options, with a particular emphasis on public transport, walking and cycling and with a particular presumption in favour of town centre locations, where the highest levels of non-car accessibility achieved and the highest levels of complementarity with other land uses can be achieved, in terms of transport demand and reducing the need to travel.

In terms of aligning retail development and transport, the NTA would support the Draft Plan's support for retail and town centre development, seeking to make town centres/retail locations as attractive and accessible by public transport, cycling and walking in particular.

The preparation of Local Transport Plans (based on the ABTA approach set out the NTA/TII Advice Note and Pilot Methodology) for urban settlements can play an important part in the achievement of vibrant, accessible town centres, which serve as the focal point for retail development.

Recommendation

The future development of designated centres in the retail hierarchy specified under section 7.82 shall be informed by the preparation of Local Transport Plans for their associated Key Growth Areas, as defined in the Draft Plan, based on the ABTA approach set out in NTA/TII guidance.

7. The Draft Plan's objectives relating to the Key Growth Areas (Chapter 10)

Strategic Consolidation and Regeneration Areas Objectives - City Centre, Docklands and Tivoli

General Comment

The NTA would support the general objective in the Draft Plan to provide for the consolidation of population and employment growth in the City Centre, Docklands and Tivoli areas, on the basis of their centrality or location on the East-West corridor for which a combination of high capacity bus, light rail and suburban rail services is provided for in CMATS. The overall scale and density of development, as proposed, particularly in the City Centre and City Docks will have a critical bearing on the transport demand conditions required to enable the delivery of the highest capacity public transport interventions provided for in CMATS, for implementation in the shorter and longer terms.

The NTA also supports the ABTA-based approach that has been applied in informing the development strategies for the Docklands and Tivoli areas, the development standards relating to parking provision and the high sustainable transport mode shares considered to be appropriate and achievable for these areas.

The indicative transport networks presented in the Docklands and Tivoli ABTAs are also considered to be consistent with the provisions of CMATS and the indicative transport measures specified for these areas.

The implementation of mobility hubs is supported as a basis for deducting from the available maximum parking provision for each Draft ABTA Car Parking Zone although it is understood that it will be necessary for the Council to undertake a feasibility study for mobility hubs and the development of a mechanism for their delivery in the Docklands and Tivoli areas.

Section 10.89

Recommendation

‘ ... with Centre Park Road identified as the ~~preferred~~ *indicative* LRT route through the City Docks ... ’

Parking Zones and Maximum Parking Standards (Figure 10.6, Table 10.5)

The NTA would support the approach set out in the Docklands and Tivoli ABTAs for the provision for the management of parking, based on Parking Zones for which a maximum parking capacity is specified, mobility hubs and restrictive maximum standards, corresponding to the density, planned levels of public transport accessibility and the very high assumed walking mode share.

Comment

It is noted that a maximum of 5,270 residential parking spaces and 5000 destination spaces are provided for across the three parking zones, with up to 1,500 spaces accounted for by the five proposed mobility hubs. Taking the total quantum of destination spaces and relating it to the estimated 20-25,000 jobs, it would appear to broadly equate to a mode share of 75% for non-car modes. However, the standards relating to destination parking in Table 10.5 would point to a far more restrictive parking regime and a correspondingly lower car mode share than the total number of destination spaces specified in Figure 10.6 would imply. It may be necessary to review this matter.

Figure 10.8 Phasing of Mobility and Transport

Comment

It is noted that an additional river crossing is indicated at the confluence of the River Lee's north and south channels that is not specified in either CMATS or Figure 10.5 Indicative Transport Network. This needs to be clarified.

Strategic Consolidation and Regeneration Areas Objectives – Cork Airport

See comments above, under Strategic Employment Sites (including Objective 7.10).

8. The Draft Plan's objectives relating to Car & Cycle Parking Standards (Chapter 11)

Maximum Car Parking Standards (section 11.238)

The NTA supports the Draft Plan's application of maximum standards and the application of the zonal approach to the determination of parking provision, based broadly on degrees of centrality within the city and levels of public transport accessibility and capacity.

Recommendation

In addition to the current provisions of the Draft Plan, it is recommended that, in locations where the highest intensity of development occurs within all Key Growth Areas, an approach that caps car parking on an area-wide basis should be considered. Furthermore, it is recommended that in order to determine the most appropriate level of parking provision within the maximum standards specified, criteria relating to public transport accessibility levels (PTALS) and access to opportunities and services (ATOS) should be applied, from which degrees of constraint can then be applied. Within each of the Key Growth Areas, this approach would be best supported by the preparation of Local Transport Plans, based on the ABTA approach set out in NTA/TII guidance.

Comments on Table 11.13 Maximum Parking Standards

One concern that arises in relation to the gradation of **residential parking standards** based on the zonal approach specified, when combined with the gradation of residential density ranges specified in Table 11.2, is that, when combined with the substantial development potential of the many large and peripherally located Tier 1 and Tier 2 sites and the high population growth allocations assigned in the Core Strategy to certain Urban Towns with lower levels of public transport accessibility, that this combination of policy interventions may have the effect of encouraging development in areas where lower densities and higher levels of parking are permitted.

In relation to the parking standards for employment, the very small difference between industry and offices needs further explanation, taking into consideration the substantial difference in employment density that exists between these land uses.

Bicycle Parking Requirements (Table 11.4)

Recommendations

It is recommended that cycle parking standards are specified as minimum values.

It is recommended that the Cycle Parking requirements in the Draft Plan are informed by the *Standards for Cycle Parking and Associated Cycling Facilities for New Developments* document issued by Dun Laoghaire-Rathdown County Council in 2018, which includes comprehensive guidance on the design of cycle parking.

(http://www.dlrcoco.ie/sites/default/files/atoms/files/dlr_cycle_parking_standards.pdf)

Electric Vehicle Parking

It is essential that the Development Plan sets out a clear pathway as to how the local authority, within its remit, will contribute to the decarbonisation of the transport fleet over the period of the Development Plan and beyond. The NTA therefore welcomes the commitment to the provision for electric vehicles through the minimum standards for EV charging points and infrastructure, set out in section 11.240 and 11.241.

Recommendation

The NTA recommends that the Draft Plan's provisions for the promotion of Electric Vehicles is maintained in the finalisation of the plan.

Concluding Remarks

The NTA reiterates its commitment to maintaining and enhancing the cooperative approach with Cork City Council which has defined the preparation of CMATS; its implementation to date; the NTA's role in investing in sustainable transport infrastructure and public transport services; and to expanding that relationship to the promotion of integrated land use and transport planning across the Metropolitan Area.

I trust that the views of the NTA be taken into consideration in the preparation of the Draft City Development Plan, and we would be available to discuss issues arising from the comments made.

Yours sincerely,



Michael Mac Area

Head of Strategic Planning