



## Transport & Mobility Forum

### **Cork City Council**

Development Plan Submissions,  
Strategic and Economic Development,  
City Hall  
Anglesea Street  
Cork, T12 T997

*Via online consultation portal*

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16<sup>th</sup> March 2023

### **Public Consultation – Response**

## **Variation no. 1 to the Cork City Development Plan 2022-2028** **(Regarding maximum limits of Car Parking provision)**

Dear Sir/Madam,

Thank you for giving the general public and stakeholders the opportunity to respond to the Proposed Variation of the Cork City Development Plan in relation to maximum parking standards.

The Transport and Mobility Forum, Cork (TMF) is a cross-sectoral representative group of organisations who have a common interest in sustainable travel \*. The TMF fully supports measures and policies promoting sustainable and active travel. Sustainable and Active Travel (cycling and walking) helps to reduce congestion on roads, improve air quality, supports a low carbon economy, reduces noise pollution and improves public health.

As such it is the TMF's aim to support the UN's Sustainable Development Goals, in particular SDG 3 (Good Health and Well-Being), SDG 11 (Sustainable Cities and Communities) and SDG 13 (Climate Action).

## Transport & Mobility Forum

### General

The TMF are very supportive of the introduction of the maximum limits for car parking provision in the city, as defined in the recently adopted City Development Plan 2022-2028. The limitation of car parking provision is a decisive factor for transforming the City's transport system away from a car centred paradigm towards a sustainable transport system that would enable the City to thrive through improved public health, economic growth and substantially reduced carbon emissions.

For these reasons we welcome the proposed reduction in maximum allowed parking levels in some types of residential development. We also welcome the improved clarity provided by the provision of maps showing the boundaries between the various zones. However, we are disappointed to see and oppose the increase in the maximum allowed level of parking for several other types of development, in particular, retail and office developments in zones 3 and 4. We are also disappointed to see that the zones as mapped show a significantly smaller area of the city within zones 1 and 2. We feel strongly that zone 1 as mapped should cover all areas within easy walking distance of the city center, all inner city areas of a dense, permeable, and walkable nature with mixed use development as well as areas immediately bordering the major public transport routes through the inner suburbs. Zone 2 should continue to cover the vast majority of the pre-expansion city.

### Rational for Parking Maxima

In our submission on the draft City development plan last year, we stated "we strongly object to the measures which increase the maximum parking provisions for new developments, as this is contrary to ensuring a liveable, walkable, sustainable City and the concepts of a 15-minute city/compact growth". We were pleased that the plan as adopted contained ambitious standards, which we hoped and expected to be further tightened as improve public transport and active travel infrastructure is rolled out in accordance to local, regional, and national policy.

In our view any softening the standards for car parking, would send the wrong message and would be detrimental to health, liveability, and competitiveness as well as to Cork City's ambitions to become a carbon-neutral city by 2030. The rapid rollout of active travel measure throughout the city over the last year and imminent delivery of public transport services through bus connects means the time is right for further tightening in parking limits.

### Proposed amendments to Table 11.13 changes in allowed maxima.

#### Residential Development

We fully support the reduction to 1.25 spaces per 1 or 2 bed unit In zones 3 or 4. We believe this is an extremely positive necessary and welcome change in line with local regional and national policy. However, we feel that the allowed parking level for 3+ bed units in zone 3 and 4 particularly zone 3 is still excessive at 2.25 spaces per unit. We strongly recommend that this is reduced to 1.5 In zone 3 and 2 in zone 4 or lower.

We also feel that the maximum parking levels still allowed in residential development in zones 1 and 2 is excessive, these are areas where driving is already a choice not a necessity or even a convenience.

## Transport & Mobility Forum

We would suggest that it is reduced to one parking space per 10 units of any size within zone 1, with provision for this to be exceeded to allow at least 1 set down or delivery place or dedicated disabled space per development. In zone 2 we would suggest that it be reduced to one space for every 5 units for 2 beds and 1 space for every 3 units for larger units.

### Education

We support the limits at present as in the existing city development plan and oppose the increases proposed in the variation.

### Leisure

We support the reduction in parking maxima for cafe's, restaurants, take away's, and pubs in zone 3. We oppose the increase in allowable parking levels allowed in zone 1 for commercial leisure, cafe's, restaurants, and takeaways. As zone 1 is dense walkable universally accessible by public transport we feel that allowing any car parking other than loading bays for this type of development in zone 1 is inappropriate.

### Retail

We strongly oppose the significant increase in the level of parking allowed for retail developments in zone 3. Retail development in zone 3, which is by definition areas less accessible by public transport or active travel, should be for local needs only not for destination shopping which in accordance with long standing retail policy should be located in the city center. Such retail serving only local needs by definition does not require significant parking even in the more car dependent areas. Therefore we would have liked to have seen a reduction in the allowed level of parking and we would call for as a minimum for the existing limits as per the city development plan to remain in place .

As stated above in reference to leisure zone 1 is dense, walkable, and universally accessible by public transport and we feel that allowing any car parking other than loading bays for retail development in zone 1 is inappropriate.

### Health

We support the limits in Zones 1 and 2 at present as in the existing city development plan and oppose the increases proposed in the variation. We fully support the reduction proposed for zone 3.

### Employment

We support the limits at present as in the existing city development plan and oppose the increases proposed in the variation, for offices in Zones 2 & 3.

As stated above in reference to leisure zone 1 is dense, walkable, and universally accessible by public transport and we feel that allowing any car parking other than loading bays for office development in zone 1 is inappropriate.

## Transport & Mobility Forum

| Suggested Table 11.13:                               | City Centre & Inner City | City Suburbs & Rail/Bus Corridors | Satellite Towns | City hinterland |
|------------------------------------------------------|--------------------------|-----------------------------------|-----------------|-----------------|
| Maximum Car Parking Standards                        | Zone 1                   | Zone 2                            | Zone 3          | Zone 4          |
| Land Use Category                                    |                          |                                   |                 |                 |
| RESIDENTIAL DEVELOPMENT                              |                          |                                   |                 |                 |
| Residential 1/2 bed                                  | 0.1                      | 0.2                               | 1.25            | 1.25            |
| Residential 3+                                       | 0.1                      | 0.3                               | 1.5             | 2               |
| Sheltered Housing                                    | 0.25                     | 0.5                               | 0.5             | 1               |
| Institutional                                        | 0                        | 1/20                              | 1/10            | 1/10            |
| Student Housing                                      | 0                        | 1/20                              | 1/30            | N/A             |
|                                                      |                          |                                   |                 |                 |
| EDUCATION                                            |                          |                                   |                 |                 |
| Universities/Colleges                                | 1                        | 1+1/20                            | 1+1/10          | 1+1/5           |
| Schools                                              | 1/5                      | 1/2                               | 1/2             | 1               |
| Creches                                              | 1/6                      | 1/6                               | 1/6             | 1/c             |
|                                                      |                          |                                   |                 |                 |
| COMMUNITY                                            |                          |                                   |                 |                 |
| Places of Worship                                    | 1/25                     | 1/15                              | 1/10            | 1/10            |
| Community and Recreational Buildings                 | 1/250                    | 1/150                             | 1/75            | 1/50            |
|                                                      |                          |                                   |                 |                 |
| LEISURE: Pubs, Restaurants, Hotels and Conferencing  |                          |                                   |                 |                 |
| Commercial Leisure                                   | 0                        | 1/150                             | 1/100           | 1/50            |
| Conference Centers                                   | 0                        | 1/75                              | 1/50            | 1/20            |
| Hotels and Guest Houses                              | 0                        | 1/2                               | 1               | 1               |
| Café, Restaurants & Takeaways                        | 0                        | 1/100                             | 1/50            | 1/20            |
| Public Houses                                        | 0                        | 1/100                             | 1/50            | 1/25            |
| Theatres, Cinemas and Auditoriums                    | 0                        | 1/15                              | 1/10            | 1/10            |
|                                                      |                          |                                   |                 |                 |
| RETAIL                                               |                          |                                   |                 |                 |
| Convenience                                          | 0                        | 1/50                              | 1/30            | 1/20            |
| Retail (including Retail Office and Retail Services) | 0                        | 1/100                             | 1/75            | 1/20            |
| Retail Warehouse                                     | 0                        | 1/100                             | 1/75            | 1/30            |
| Showrooms                                            | 0                        | 1/150                             | 1/100           | 1/50            |
|                                                      |                          |                                   |                 |                 |
| HEALTH                                               |                          |                                   |                 |                 |
| Hospitals (In patient facilities, Nursing Homes)     | 1/10                     | 1/5                               | 1/2             | 1               |
| Hospitals (Outpatients)                              | 1/100                    | 1/80                              | 1/60            | 1/40            |

## Transport & Mobility Forum

|                                                              |   |       |       |       |
|--------------------------------------------------------------|---|-------|-------|-------|
| Medical Clinics                                              | 1 | 1     | 1     | 1     |
| EMPLOYMENT: Including Offices, Industry<br>Light and General |   |       |       |       |
| Industry                                                     | 0 | 1/140 | 1/100 | 1/80  |
| Offices,                                                     | 0 | 1/150 | 1/100 | 1/50  |
| Warehouse                                                    | 0 | 1/300 | 1/200 | 1/200 |

### Map of parking zones should reflect the rational well-planned zones outlined in the current plan

The Zones as contained in the existing city development plan are rational, well thought out, and coherent, an example of good planning. While we welcome the necessary mapping of the boundaries between zones we strongly support the retention of the existing zones as there is a clear hierarchy based on rational well-founded planning criteria.

Zone 1 as presently constituted is the area where the vast majority of daily services employment and residences are an easy walking distance from each other and the entire region is easily and frequently accessible by public transport, accepting only isolated areas which are not served by any public transport. These areas are already easily accessible without a car with the majority of residents already not owning a car and the majority of footfall not relying on the car to arrive and there is no demand or rationale for requiring further parking beyond deliveries disabled access etc.

Zone 1 as mapped is excessively tightly mapped excluding significant areas, such as the area around UCC and others, which are within easy walk distance of all services and transport hubs and car free living is already the norm as show the very low modal share of driving.

We would suggest that the areas of urban rather than suburban character within easy walking distance off the city center remain within zone one. This would include;

The area between Blackpool village and the city center,

The Shandon Street area.

The Mardyke. Victoria Cross and UCC area

The South parish



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The historic Victorian quarter including Saint Luke's

This area is mapped below.



Zone 2 as presently constituted is urban areas well-served by public transport and local services. Everyday services such as primary schools, local shops etc can easily be accessed on foot and there is a regular public transport service to and from the city center at minimum. Here there is a limited dependence on cars and the use of a car is a choice, not a necessity.

The proposed map in effect removes the vast majority of the pre-expansion city plus the suburbs beyond Douglas village from zone two and places it in zone three. While there are parts of the edge of this areas, such the more distant parts of Grange, Donnybrook, Hollyhill and Ballyvolane, where this may be appropriate where they better match the characteristics of zone 3 it is highly inappropriate for the majority of this area in particular the inner suburbs such as St Luke's, Granabrather, The Lough, Ballyphane and Ballinlough, as well as inner suburban service and transport hubs such as Wilton and Douglas village.

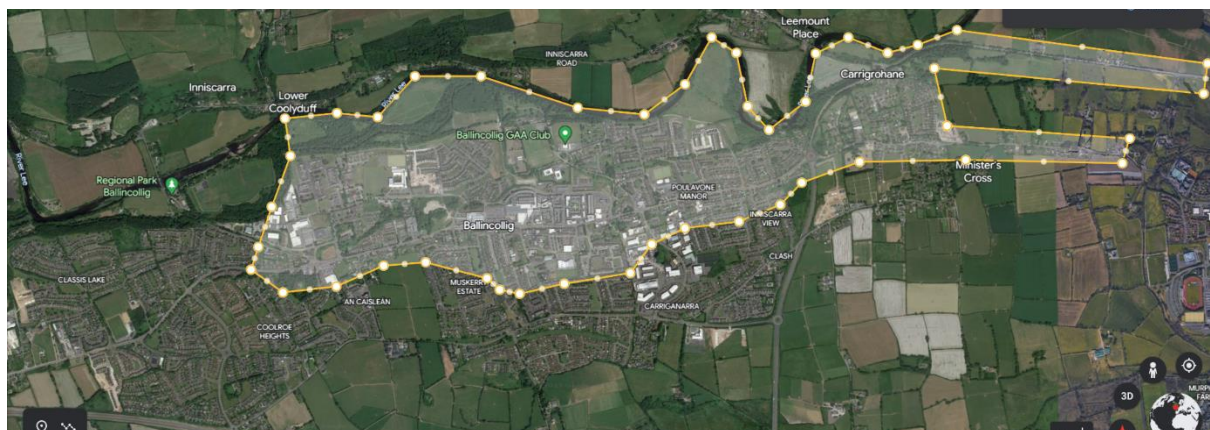
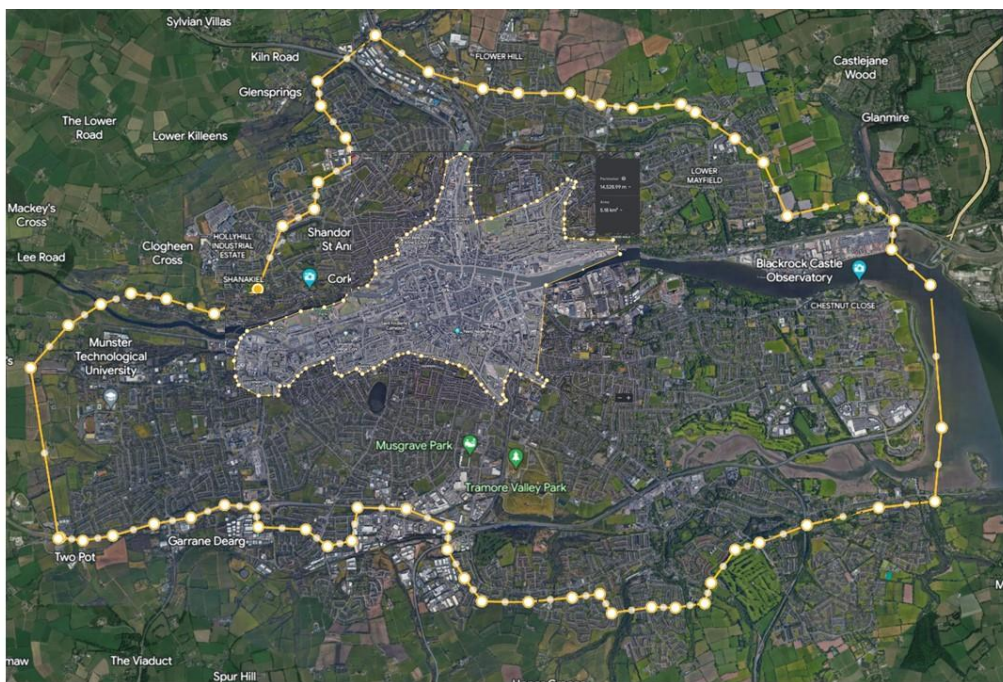
We would suggest that the majority of the pre expansion city accepting only those areas where there are particular issues preventing the widespread use of active travel, access to public transport, or the character of the area is a particularly low density without local services such as corner shops hairdressers etc should remain within zone 2. The areas of Douglas, Grange, and Donnybrook within easy walking distance of Douglas village and which are served by high frequency bus routes similarly



## Transport & Mobility Forum

should remain within zone 2 as should a strip along the Main Street of Ballincollig where all services are easily accessed by walking or cycling and there is particularly good public transport service provided by the 220 bus route.

This area is mapped below.



Zone 3 as presently constituted is the distant suburban areas which while served by public transport links to the city center do not generally have all everyday services within easy walking distance and

## Transport & Mobility Forum

the frequency and timing of public transport may sometimes make it difficult to rely purely on public transport for all of your transport needs. Here while it is possible to live without a car there are still challenges that leave many with some dependency on a car. While Zone 4 as presently constituted are areas that are not planned to have the population density which you could support local services or regular public transport and where car dependency is expected to remain in the short and medium term.

We feel the boundary between these zones as shown in the proposed map well reflects this logic and has our support.

### Conclusion:

The TMF feels that the Proposed Variation of the City Development Plan needs to serve Cork City's ambitions to become a carbon neutral city by 2030. We need to speed up the sustainable transformation of our lifestyles and everyday behaviour around transport. We need to take hard decisions now, we will benefit from in the future. The pressure must be kept high for the timely roll-out of improved active travel infrastructure and the BusConnects / Connecting Ireland programmes for Cork.

*We would be obliged to further participate in the discourse and **planning processes around this and other Active Travel improvement schemes** as we feel that TMF can provide valuable input into the process. Please do not hesitate to contact us at any time at [tmfcork@gmail.com](mailto:tmfcork@gmail.com).*

Kind regards

*Stephan Koch*

Transport and Mobility Forum – Acting Chair

*Darren McAdam-O'Connell*

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**Note:** *The comments within this submission are solely the view of the Transport and Mobility Forum (TMF) as a whole and not the opinion or view of any individual partner of the TMF.*

*\*) A full list of partners in the Transport and Mobility Forum can be found at*



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<https://transportandmobilityforum.com/partners/>