

# Proposed Cork City Development Plan 2022 - 2028

Briefing paper

10<sup>th</sup> September 2021

## Proposed Draft Car Parking Standards – Retail Planning

We have reviewed the car parking standards detailed as part of the Proposed Cork City Development Plan 2022 – 2028. The following is a general commentary with specific reference to the Urban Expansion Area's needs.

The proposed standards, as detailed in Table 11.13 of the Draft Plan, have the potential to support modal shifts in the future but this must be carefully balanced against the programme of delivery of Public Transport and any proposals to enhance Connectivity over the lifetime of the plan.

The proposals present ambitious car parking standards given the current and near term pattern of public transport in Cork.

While the standards have the potential to reverse car dependency, supporting the modal shift towards sustainable methods of travel, including walking, cycling and the use of public transport, the standards, if implemented, have the following risks:

1. Specific use types, even in areas where there is a high penetration of public transport, still require car parking for bulky goods or goods bought in bulk.
2. Specific uses which generate high numbers of employees still create a demand for car parking as well as public transport.
3. Accessibility to public transport is important. Allowances should be made for the standards to be relaxed where there is limited public transport. Accessibility Matrices have long been applied in the UK Planning System where the same uses can have different car parking provisions on the basis of their proximity to / or distance from, public transport.

Confidential

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## Proposed Draft Car Parking Standards – Comparing them to Mature Public Transport Locations in the UK

We have concerns around the proposed retail and retail warehouse car parking standards (shown in Table 1), and specifically how these standards fail to recognise the parking requirements of retail operators as well as levels of existing public transport accessibility, particularly within areas defined in the draft Plan as part of Cork’s suburbs, (within Zone 2, and more rural areas in Zone 3) and in particular Urban Expansion Areas such as Ballyvolane where there is a need for a new Neighbourhood Centre to cater for the emerging urban area.

<u>Land Use Category</u>	<u>Zone 2</u> <u>Ballincollig, City Suburbs and areas</u> <u>accessible to mass transit (existing or</u> <u>proposed LRT, Core Bus Network</u>	<u>Zone 3</u> <u>Blarney, Glanmire, Tower, Rochestown</u>
Maximum Standards. 1 space for each unit of gross floor area sq m.		
Retail		
Convenience retail	50	30
Retail	100	50
Retail warehouse	100	75

**Table 1: Extract of Emerging Cork Development Plan’s Car Parking Standards.**

As a comparison, we have provided examples from three locations in the UK as evidence that the parking standards are substantially different for comparable areas of accessibility.

Appendix A to this provides evidence of Car Parking Standards and Provision in:

- Sunderland
- Surrey
- London (TRICS Database Derived Figures)

In real terms, areas considerably better connected by existing public transport facilities, including London, have more effective and realistic retail parking standards in comparison to Cork. This is an important marker from a sustainability and development viewpoint in that community needs in some instances are not necessarily served by a decreased level of car parking.

We appreciate that once the development proposed within the Ballyvolane Urban Expansion Area (UEA) is fully constructed, it will significantly alter the context of the site from its present ‘rural-edge’ character into a suburban area to the northeast of Cork, and once development comes forward, the core bus network will be implemented to serve the area thereby enhancing the capacity for public transport to address modal shift. However, at present there is a need for private vehicles and the likelihood is that it will continue for

the foreseeable future pending the implementation of Bus Connects and the detailed design and delivery of the Inner North Distributor Road.

We are supportive of the car parking standards within Table 1 being the goal to be achieved towards the latter part of the plan period, once the public transport infrastructure has been put in place. However, these proposed standards are unrealistic. If applied inflexibly at this stage, the proposed standards are likely to frustrate economic development by failing to meet the needs and parking requirements of retail operators and negatively impacting upon Cork's economic sustainability. The same applies to parking for employment / industrial / warehousing locations.

We believe that more relaxed retail parking standards should be implemented from the outset of the plan period and then closely monitored over time as the accessibility profile of these zones change.

The standards can then be tightened over the duration of the plan, as opposed to being relaxed as currently proposed, to reflect the increased provision of public transport infrastructure across this part of Cork. Deficient (overly hard) car parking provision can result in no development. If no development takes place in the first instance due to challenging car parking standards being seen as another issue in the complex framework of delivery, the standard will never be reviewed as it can never be questioned post adoption.

### **Parking Standards in Sunderland City Council's Administrative Area**

An example of accessibility considerations is offered by Sunderland City Council. Parking standards implemented within Sunderland City Council's Development Management Supplementary Planning Document (SPD), adopted in June 2021, are based on accessibility scores. This approach creates a flexible framework for managing car parking delivery and provision depending on public transport provision.

These standards and accessibility criteria are set out in Appendix A.

### **Parking Standards for Surrey County Council**

Similar standards to Sunderland are evidenced for Surrey County Council (also in Appendix A), where food retail (above 1000sqm) can provide a maximum of 1 car space per 14sqm; however, a suggested reduction of 25% is detailed for suburban locations, resulting in a maximum standard of 1 space per 18sqm.

No reduction is required for suburban/edge/village/rural locations. Regardless of the reductions based on accessibility, these standards allow for a more nuanced approach

where, regardless of public transport options, the need for some forms of retail to have to accommodate private car users is recognised.

### **Convenience Retail Parking Levels in London**

Examples from the UK, particularly London, support the implementation of more relaxed retail parking standards in Cork.

The Table in Appendix A evidences a number of supermarkets across London with varying Public Transport Accessibility Level (PTAL) ratings, with 6b being the most accessible locations and 1 being the least accessible.

The table shows that on-site parking per GFA (sqm) decreases in line with the site location's accessibility, and as a result, parking provision is higher where sites are less well connected. However, all sites, regardless of their accessibility, provide 1 space per 22sqm GFA or less; with 1 space per 30sqm GFA equivalent to the proposed parking standard for convenience retail within Zone 3<sup>1</sup> of Cork, where there is no existing availability of public transport. Additionally, 1 per space per 50sqm GFA proposed for Zone 2<sup>2</sup> is significantly more aggressive than existing retail sites within London, where public transport accessibility is significantly further advanced than Cork's existing infrastructure.

In summary, the proposed City Plan standards for convenience retailing are very severe and should be amended to;

- **1 space per 20 sq m GFA for Convenience Retail for Zone 3 and**
- **1 space per 30 sq m GFA for Convenience Retail for Zone 2 (where there is major public transport in operation), and**
- **1 space per 20 sq m GFA for Convenience Retail for Zone 2 (where there is no major public transport in operation),**

### **Conclusion**

The examples above demonstrate that the proposed car parking standards within the emerging Cork Development Plan are significantly tighter than across the UK, particularly London where the city's public transport infrastructure is significantly further advanced and established than that within Cork.

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<sup>1</sup> Where Ballyvolane, for example, currently and for the near term, is in realistic terms

<sup>2</sup> Where Ballyvolane, for example, is actually located in the Draft Plan Hierarchy

Whilst we support the direction of travel towards stricter car parking standards once the public transport is in place over the coming years, the standards to be applied today should have regard to the relatively low levels of accessibility by public transport across Cork, particularly within Zones 2, 3 and 4 and implement more realistic standards within these zones that support, rather restrict development coming forward.

## Appendix A

### Example of Car Parking Standards (Incl. Accessibility Matrix) from Sunderland

Sunderland City Council's Development Management SPD (June 2021)

Non-Residential parking standards			
Category	Car Parking Accessibility Score		
	Low	Medium	High
E(a): Food retail			
500sqm GFA	1 per 15sqm GFA	1 per 20sqm GFA	Case by Case

Accessibility Questionnaire – Non-Residential Development				
Site Location:				
Site Description:				
Access Type	Criteria	Criteria Scores		Sub-Score
Walking	Distance to the nearest bus stop from the main entrance to the building (using a direct, safe route)	<200m	5	
		<300m	3	
		<500m	1	
		>500m	0	
	Distance to the nearest railway/metro station from the main entrance to the building	<400m	5	
		<1km	2	
		>1km	0	
Cycling	Distance to defined cycle routes	<200m	3	
		<500m	2	
		<1km	1	
Public Transport	Frequency of principal service from nearest bus stop during operational hours of the development	15 minutes or less	5	
		30 minutes or less	3	
		>30 minutes	1	

	Number of bus services serving different localities stopping within 200 metres of the main entrance	4 or more localities served	5	
		3	3	
		2	2	
		1	1	
	Drive to the nearest railway/metro station	10 minutes or less	3	
		10-20 minutes	1	
Travel Reduction Opportunities	Facilities on site or within 100 metres that reduce the need to travel	*food shop/cafe	1	
		*newsagent	1	
		*creche	1	
		*other	1	
			Total	0

#### Accessibility Level

High:	24-30
Medium:	16-23
Low:	Less than 15

### Example of Car Parking Standards from Surrey

Surrey County Council's Vehicular and Cycle Parking Guidance (January 2018)

RECOMMENDED GUIDANCE – Maximum Vehicular Parking Levels	
Use Class	MAXIMUM per sqm GFA
<b>A1 Retail</b>	
Food retail (above 1000sqm)*	1 car space per 14sqm
*Suggested reductions as stated or greater, to be applied based on location. Note: Retail parking to be provided as shared use where appropriate.	Town Centre 75% Edge of Centre 50% Suburban 25% Suburban/Edge/Village/Rural 0%
<b>B8 Storage/distribution (including open air storage)</b>	
Warehouse - distribution	1 car space per 70sqm 1 lorry space per 200sqm

## Examples of Car Parking Standards for London (TRICS Database Derived Figures)

On-site Parking Provision per GFA for Supermarkets in London in relation to their PTAL rating

<u>Store</u>	<u>Site Location</u>	<u>PTAL (Public Transport Accessibility Levels) (6b High – 2 Low accessibility)</u>	<u>On-site Parking per GFA (sqm)</u>
Sainsbury's	Camden, NW1 9LJ	6b	21.5
Asda	Brent	5	20.1
Sainsbury's	Wandsworth, SW17 4AD	4	18.4
Sainsbury's	Barnet	3	14.3
Waitrose	Harrow	3	12.7
Sainsbury's	Richmond	2	11.4
Tesco	Ealing	2	4.6
Marks & Spencer	Croydon	2	3.4