

Comment ID	Section/ Page	Comment	PHC Response
001		<p><b>Overall Comment</b></p> <p>Thank you for the opportunity to comment on the Draft Development Plan. The Plan comes at a critical juncture in the development of Cork City's and bold decisions must be taken. The Plan will go some way towards addressing underlying deficiencies in housing, dereliction and under-utilised sites, air quality, retail, flooding, sustainable transport, street and public space and quality open space provision. Cohesion and unity of purpose across all Council departments and Elected Members will be needed.</p> <p>There is significant public support and mandate for change and the recent warm support for pedestrianisation, parklets and pop-up cycle provision should give the Council encouragement to continue the process and leave a lasting legacy.</p> <p>The Plan has an impressive level of detail in many respects, not least in the City Docks and Tivoli Docks sections that will be required to do a lot of heavy lifting to meet Cork's ambitious population targets. The use of international comparator cities is welcome and the evidence-base across the Core Strategy section is impressive. The work undertaken by the Planning Department staff to publicise the document, embrace innovative engagement initiatives and 'front up' at webinars and public events is highly commendable.</p> <p>The Plan is clearly in alignment with the relevant hierarchy of Plans at national and regional level. The comments outlined below are intended to assist the finalisation of the draft and add detail as opposed to a critique of the document itself. Happy to discuss if required. Best of luck for the completion of the Development Plan process.</p>	
002	1. Introduction	Freedom of the City – UCC, Glucksman, Healthy Cities and CCC and assorted child focussed policies.	

		<p>The is a welcome initiative and innovative addition and helps address the exclusion of schoolchildren process from the plan making process. Many UK LA’s employ a ‘Youth Parliament’ to discuss relevant Development Plan themes and impact of strategic decisions which is something that could be considered going forward.</p> <p>The message coming for a City with less cars, better quality public space and a much greener city could not be clearer and again, should provide confidence to Elected Members and staff that an aggressive approach to reallocation of public space to meet place-making objectives is warranted.</p>	
003	Core Strategy	<p><b>Growth Targets</b></p> <p>2.22 LRT</p> <p>CMATS identified the need for an east-west LRT based on land use assumptions provided to the Study by Cork City Council and an appropriate form of mass public transit that catered for that projected demand. Should the Council propose intensifying land-use along a N-S axis – (roughly North Blackpool to the Douglas Area/Airport/Kinsale P&amp;R) than the planning of a second LRT line would be justified.</p> <p>This would require plan-led strategic decisions to be taken about the location of the second elective hospital, a Northside MTU educational campus, and more intensive mix of uses of sites at the N20/ Mallow Road Gateway, Tramore Road/ Kinsale Road, Tramore Greenway, Tramore Valley Park and vastly underutilised sites in public and private ownership such as St Finbarr’s Hospital, Capwell Bus Garage, petrol stations, surface car parking areas and car room showrooms.</p> <p>The text should reflect the ambition to work with the NTA, DTTaS and relevant landowners (see below) to re-examine the case for a second N-S LRT line over the lifetime of the Development Plan. The regeneration and business case for a N-S LRT in Cork is likely to be stronger than other public transport projects across the State and helps future-proof development in key areas.</p>	

		<p>2.33 Windfall Sites</p> <p>The language is a little passive not least particularly given the role and expanded mandate of the LDA (and CCC) to develop housing on public land. Many of the sites in public ownership are woefully underutilised at present, are fully serviced and can be developed relatively quickly as viable med-high density (Transit Oriented Development).</p> <p>The text should reflect a proactive approach and commitment to engaging with the owners of public and private landowners (2.18-2.20) with a view to producing masterplans/development frameworks over the lifetime of the Development Plan.</p> <p>2.38 Dereliction and Underutilised sites</p> <p>The remediation of these sites represents a significant opportunity to gain momentum on meeting Cork’s population targets as well as restoring confidence to residents, businesses and investors, Recent initiatives on CPOs, Living City etc are acknowledged and appreciated but the text needs to be a lot stronger here including commitment to a “one-stop shop” and the use of crowd-sourcing information on vacant sites. The use of a Call for Sites/ commitment to producing innovative Site Allocations document should be included here to enable a more inclusive approach to tackling dereliction.</p> <p>2.20 Core Strategy Map and CSiP</p> <p>It is understood that the Route Option and Assessment process for the LRT is underway. The strong likelihood is that the initial phasing will be a Ballincollig to City Docks route. The omission of the Curraheen CSiP is a little surprising in this regard given recent momentum with MTU, SHD’s, Sports facilities, and UCC Dental Hospital etc.</p>	
004	Delivering Homes and Communities	<p>3.5 Settlement Structure</p> <p>Appreciate that a RSES structure has been applied here but it is debatable that Tower is an ‘Urban village’ in the traditional use of the term.</p> <p>The lack of defined set of ‘Urban Villages’ (St Lukes, Ballintemple, Blackpool, Blackrock etc) is noticeable though it is noted that much of the commitment to strengthening them</p>	

		<p>along the lines of the Walking Strategy 2018 'Gap analysis' of 15 minute catchments and public realm improvements is broadly covered in the 15 Minute City/ Walkable Neighbourhood section.</p> <p>3.8-311 15 Minute City</p> <p>The broad thrust of the text is very welcome and the dissemination of the city to 35 City Neighbourhoods is innovative. The principle of 15-minute City usually refers to access to a mass transit system over and above a 'bus stop' (3.8). Suggest an amendment to refer to a high-frequency BusConnects stop/interchange, rail station or LRT stop.</p>	
005	Transport & Mobility -	<p>General Comment</p> <p>Much of the text faithfully transcribes that contained in CMATS into a Development Plan. Some of the themes discussed in CMATS – addressing barriers to walking, cycling and public transport use, the need to address long-standing deficiencies in footpath provision, management of poor driver behaviour and car parking management are all within the gift of the Council to manage irrespective of strategic funding.</p> <p>The document would benefit from a more targeted local interpretation of the CMATS text with some suggestions added below.</p> <p>Table 4.3 Nash's Boreen should be included here as a link between Fairhill and the Apple Campus at Hollyhill. Link between Togher and Tramore Valley Park should be included. The Lee-to-Sea concept needs to be broken down into a series of manageable project areas to gain traction. CCC should state the intention to conduct a Feasibility for all/part of the route within the CCC administrative boundary – eg. Ballincollig to Lee Fields, City Centre to Marina etc etc. The City Centre part of the route should tie in with place-making and tree planting/SuD's etc objectives around the river.</p> <p>4.4 Mode Share targets. The CMATS mode share targets are 'outcomes' of the NTA SWRM strategic modelling process across a wide geographical area that includes semi-rural areas as opposed to a</p>	

		<p>target. The SWRM strengths lie in public transport demand analysis and provision but are acknowledged by the NTA as being particularly weak for active modes. The text should reflect that these are not targets for the Cork City Administrative Area and that more ambitious targets will be adopted by the Council (As a reference point, the City Docks section shows 80% non-car modes).</p> <p>Mode share is heavily influenced by demand management techniques such as Controlled Parking Zones, parking standards, and effective enforcement of illegal motorist activity such as footway, bus lane and cycle lane parking. A commitment to addressing barriers to sustainable transport with dedicated actions – removal of street clutter, comfortable crossing times and facilities, tackling illegal parking, reduction of urban speed limit on non-arterial roads, commitment to adoption of DMURS standards for all new and retrofitted roads and streets, dedicated shared cycle parking hub(s) in city centre, public transport stops, and employment centres.</p> <p>Sustainable Urban Mobility Plan (SUMP)</p> <p>As per previous Development Plan, a SUMP is an EU-backed mobility plan at city-level that provides a framework and yearly targets for positive modal shift, carbon reduction and air quality improvement. A SUMP is a required document for some EU funding streams for projects and initiatives are not necessarily funded at national level.</p> <p>The Council should commit to producing a Cork City SUMP that sets City specific Mode share targets and cross -department actions including street trees, micro mobility, commuter and cycle hubs, EV Charge points, last mile freight etc etc. This would enable the successful translation of CMATS at local level and increase eligibility for alternative forms of funding.</p> <p>Other Cycling Interventions</p> <p>Add The Council will identify suitable locations in the City Centre, public transport stations, 3<sup>rd</sup> Level and employment locations to develop a covered cycle parking hub to enable commuters to avail of safe and secure cycle parking particularly in areas where there are space constraints on internal provision.</p>	
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		<p>wholly eliminated” in highly accessible areas such as in or adjoining city cores, or within 15 minutes walking distance of commuter rail, light rail or high frequency bus services; and</p> <ul style="list-style-type: none"> <li>▪ <b>Climate Action Plan 2019</b> proposes the development of strategic Park and Rides.</li> </ul> <p>The Zonal Car parking approach (Table 4.6) to car parking is supported however, in some <b>more peripheral locations</b> where public transport provision is limited, the adoption (and yearly review) of a robust, site-specific Mobility Management Plan and a commitment to gradual year-on-year reduction of car parking may be appropriate dependent on the scale and nature of business/use and the timeframe of public transport delivery.</p> <p><b>On-Street parking</b></p> <p>4.110 Add new bullet point as follows;          - Provide consolidated Area Based Parking solutions for new development e.g in Mobility Hubs or where long-standing on-street parking has necessarily been displaced as a result of BusConnects, Safter Routes to School, urban village public realm upgrades, pedestrian and cycle safety measures, local flooding mitigation and local environment improvements.</p> <p>4.152 Area Based Transport Assessments</p> <p>It is worth stating the areas that CCC envisages where these are required over the next few years where growth is targeted i.e</p> <ul style="list-style-type: none"> <li>- Blackpool,</li> <li>- Ballincollig</li> <li>- Mahon,</li> <li>- Blarney/Stoneview</li> <li>- Glanmire</li> <li>- Cork Science and Innovation Park/Curraheen.</li> </ul>	
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006	Chapter 7 -7.78	<p><b>Retail</b></p> <p>There is a lot of commentary on retail in Cork but little in the way as to how the Council will proactively steer it to ensure a vibrant city centre mix. The mandatory Joint Retail Study is unlikely to reaffirm anything different on retail hierarchies and guidance on suitable locations for various types of retail. Spatial planning requires a more proactive response than land use planning to such a live issue.</p> <p>It should be noted that much of the retail closures in the last few years are related to an over-reliance on long-mis-managed UK multiples like the Arcadia Group and Debenhams that had little to do with relatively buoyant trading conditions in Ireland. The level of retail vacancy in equivalent (and smaller) city centres in EU cities is typically 5%. These city centres are typically pedestrianised and well accessible by public transport emphasising the importance of CMATS roll-out. The NTA and Millward Brown research in Dublin and TfL/ Pedestrian Pound/Living Streets/Sustrans research elsewhere suggesting that shoppers that travel by walk, cycle and bus spend more and are more loyal to city centres could be referenced.</p> <p>Research suggests that many companies will return to a mix of online and bricks-and-mortar personal 'experience' and that leases are likely to shorter with more adjustable rents. Other LA's have successfully directed new forms of retail – Hackney's Fashion Quarter, Portsmouth's Gunwharf, Killarney's Outlet Centre, Boxparks etc – to locations within the town centre. There is no reason that the Council should not proactively look to direct a Kildare Village type-development within or immediately adjacent to, its core retail area.</p> <p>The Council should engage with real estate agents to undertake a gap analysis of store types and local (County town 'chains'), national (Shaws, Arnotts) and EU international chains that might reasonably expected in a typical European city and identify a range of incentives to establish them in Cork. The City lacks known footfall drivers such as Indetex Group (Zara, Pull &amp; Bear, Bershka). IKEA as an example, have metro stores in continental city centres. The management of Mahon Point has stores not readily available in Cork City Centre and has sought to address the Debenhams closure with the arrival of the Fraser Group.</p>	
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		The above would likely entail widening the scope of the City Centre Coordinator role but would represent an innovative approach to tackling a growing list of retail vacancies in the city centre and help reverse the flight to the suburban centres of others.	
007	Chapter 6  GBI, Open Space & Biodiversity	Objective 6.5  Trees & Urban Woodland  Suggest an additional bullet point  - Identify locations for new urban forestry areas across the CCC administrative that will assist in reducing urban sprawl and preserving and enhancing the identity of older city neighbourhoods and new city suburban areas.	
008		City Parks  6.46 Tramore Valley Park – add Feasibility Study for pedestrian/cycle between Togher and TVP upgrading the existing greenway adjacent to the Tramore River and including a safe link across the Kinsale Rd P+R and N27.	
009	Chapter 10 N'hood Development Sites Objectives.	Neighbourhood Development Sites  This is a very welcome addition and signals the Council's determination to advance housing in pivotal, well-connected under-utilised sites. The petrol station site on Model Farm Road is a well-chosen image to convey this.  As above, a similar inclusion of sites in semi-state or public ownership would be useful given the new remit for CCC and the LDA  - Capwell Bus Station, Summerhill South - St Finbarres Hospital, Douglas/South Douglas Road. - ESB site, Centre Park Road/Marina - Former Irish International Trading Centre, Gasworks Lane/ Hibernian Rd - Gas Works site, - Collins Barracks	

		<p>There are a number of other long-standing sites (5 units or more) that should be picked up in a Site Allocations site document or similar including former Lions Den pub &amp; adjacent sites (Douglas Road), Old Market Place, Blarney Street and the religious grounds.</p> <p>The language again should be more robust. Access and Permeability "Consideration <i>will be</i> given to permeability and there will be a presumption against cul-de-sac developments.</p> <p>-</p>	