



Transport & Mobility Forum

Cork City Council

City Development Plan 2022-2028

Planning Policy Unit

City Hall

Cork

Via online consultation portal

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TMF DRAFT 9

4th October 2021

Public Consultation – Response

Cork City Development Plan 2022-2028 Draft Document

Dear Sir/Madam,

Thank you for giving the general public and stakeholders the opportunity to feed into the new City Development Plan (CDP 2022-2028)

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 sustainable modes of travel measures and policies. Sustainable and Active Travel helps reduce congestion on roads, improve air quality, supports a low carbon economy, reduces noise pollution and improves public health.

We welcome the opportunity to feed into the Draft Cork City Development Plan 2022-2028, as it will form the City's development towards a sustainable and futureproof city well into the 2030s, at a time where decisive action is needed to address the challenges presented locally (significant planned growth) and globally (climate change).

General Comments

Introduction

We feel that this draft offers real significant progress in producing a liveable, sustainable, healthy city.

There is a consistent appreciation that the issue of transport is best addressed not by simply increasing capacity of existing transport infrastructure but rather through compact growth and a 15-minute city reducing average journey distances and allowing a modal shift towards sustainable transport modes to occur.

There are many welcome aspects to this plan which we would first like to acknowledge.

While we agree with the main focus of the Plan and we strongly support the vast majority of the measures outlined in this draft document, we would like to offer constructive criticism of a few points, where we feel that measures could further be strengthened to better support the high level objectives in the plan.

Following our main points outlined below, we will go through these points in more detail on a chapter by chapter basis. More detailed comments on each chapter will be in the appendix.

Main Points

Transport is responsible for 40% of Ireland's greenhouse emissions the largest of any sector and the lion share of those transport emissions come from road transport. Reducing the number of cars on the road, the number and length of car journeys has to be the first priority in any greenhouse gas reduction strategy.

We welcome that this draft acknowledges the roll of modal shift, active travel, public transport, and spatial planning in this transformation.

Support

The focus on Sustainable travel over less sustainable modes is very welcome.

We strongly welcome the focus on compact growth and the concept of the 15-minute-City

Great progress is made in relation to increasing residential and employment densities and the limitation of parking provision as the basis for a substantial modal shift towards sustainable travel modes and away from the dominance of private car use.

Requests / Critical Comments

We feel that too much of proposed development is spread out over suburban locations, while there is insufficient ambition to intensify development in the city centre locations / docklands, this needs to be addressed in order to promote compact growth.

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Notwithstanding our support above, we feel that the targets in density will fall short in achieving the desired outcomes of the plan as they will fall short of a tipping point required to achieve the viability of local service required for a 15 min city to become a reality.

Detailed comments by Chapter

Chapter 2 - Core Strategy

Main points

- We strongly support the vast majority of aims and objectives laid out in chapter 2 particularly the focus on compact growth and the 15-minutes City
- The quality of vision and execution of the draft chapter is to be commended
- However, we are concerned that the low-level of tier 1,2 & 3 lands identified in table 2.3 for development in the city centre and to a lesser extent in the Docklands does not truly reflect the level of derelict and underutilized sites in the city centre. Failing to identify more than 2Ha. Of land for redevelopment in the city centre threatens the delivery compact growth and a 15min city.

Chapter 3 - Delivering Homes and Communities

Main points

- We strongly support the vast majority of aims and objectives laid out in chapter 3 particularly the focus on compact growth and the 15-minutes City
- The quality of vision and execution of the draft chapter is to be commended
- We have suggested some slight modification/strengthening of some objectives to better support the provision of infill development.

Chapter 4 - Transport & Mobility

We commend the City Council for their courageous steps towards prioritising Active Travel and Public Transport over car traffic and we fully support the main direction of the chapter. Some points of particular interest will be highlighted below, and also some constructive criticism expressed.

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As Transport and Mobility is the TMF's core interest, aspects in this chapter will be addressed in more detail.

Positives

We welcome and are fully supportive of the strong emphasis that the CDP puts on **strengthening the role of Active Travel** (walking and cycling) and the proposed improvements of their infrastructure.

The same applies to the significant **enhancement of public transport**. We particularly welcome the plans for a light rail line, and the proposed pre-light rail high frequency bus service along the east-west corridor to promote further development in the future light-rail corridor (4.68, Advance Bus Provision).

We support the plans for **strategic Park+Ride sites**, and the same to be linked to the general public transport network (as opposed to today's shuttle buses from Black Ash). [Priority should be given here to locations north of the River Lee \(Blarney, Dunkettle\) to compensate for the currently existing deficit here.](#)

We strongly support the plans for **Safe Routes to School** (4.42), as we believe that lessening the dominance of car usage for the school run is a key for changing overall travel behaviour in the city.

We support the proposals regarding **on-street parking** (4.106 – 4.110), the reduction of public street space taken up for parking and the repurposing of spaces for public realm improvements, in particular tree planting, social life etc.

We welcome the commitment to increase **the permeability** of the city and prepare permeability strategies (4.20). We would strongly suggest that before each strategy is prepared an audit is first undertaken of the existing permeability of each community within the city.

Gaps and Criticism

In the Transport and Mobility chapter, strong reference is made **to CMATS (2020)**, which shall be the basis for the future development of the city's transport sector (see Objective 4.1)

The **projected modal share figures** for 2040 in CMATS have already been subject to large scale criticism as they seem under ambitious regarding the modal shift in order to achieve the two overarching goals; accessibility in light of the city's growth, and reduction of carbon emissions. While the figures quoted in CMATS apply for the entire CMA, there are no projection or target figures given for the City itself, neither in CMATS, nor in the CDP.

[We strongly suggest that the CDP would provide ambitious target figures for modal shift for the City for 2028.](#)

Extrapolation from 2040 projection figures in CMATS suggest that despite a reduction of the modal share to under 50%, the **absolute amount of car journeys** in the CMA will still see a substantial increase, given population and employment growth.

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If accessibility to the city should be maintained and more room be given to public transport and active travel, it is hard to imagine how car travel in the city should still grow beyond present levels (in absolute figures), while a decrease of the absolute number of car journeys appears inevitable. Further, there are only figures of car journeys mentioned, irrespective of the mileage driven per journey. While the number of journeys might still remain high, their lengths must be reduced by promotion of multi-modal trips (esp. Park+Ride).

[We request that a clear statement towards the reduction of private car traffic in the city is included as an objective in the CDP.](#)

In relation to the very under ambitious CMATS projection figures for the modal share of cycling (4% in 2040 in CMA), we note that this is being questioned in the CDP and a far higher modal share can be anticipated (4.29). Places like e.g. UCC have had cycling shares of over 10% for years for their staff commute. We believe that the potential for cycling is largely under-estimated, and the potential of the fast developing 'cycling as a system' not duly acknowledged. Cycling as a system in 2025 will be far different from 2010 or 2015 (e.g. availability of e-bikes).

[We ask that 'cycling as a system' and its future potential for modal shift is duly reflected in the CDP.](#)

We are missing any statement in the Plan regarding **traffic calming and lower speed limits** in the city. Particularly, but not only, safe routes to school would necessitate more room for pedestrians and slower speeds for motor traffic, i.e. a substantial and short-term increase on 30km/h zones in residential areas and on main walking routes.

[We recommend that Traffic calming and lower speed limits should also be included into the objectives in chapter 4 \(e.g. Objective 4.4\)](#)

The development of **safe routes to school** finds our full support (see above), and the programme should be rolled out with high priority. This must also include a re-distribution of street space and measures of traffic calming on such routes

For many employees, the school run is part of their daily travel routine. The aim must be to reduce the number of pupils and students who are driven to school each morning by car, as the school traffic represents a high proportion of motorised traffic in the morning peak.

The ultimate goal must be that – depending on age – **children should be able to walk or cycle to school (or take the bus) independently**. If the parents' commute does not have to include the school run, they will have far greater flexibility to use sustainable modes for their commute to work, which would alleviate motor traffic load and parking pressure. Addressing the school run can be seen as one important key to a change in overall travel patterns.

In this context, dedicated school bus services for the city's outlying areas should also be considered to reduce car dependency for the school run.

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We hence suggest including the goal of an increasing number of children getting to school independently into the CDP.

While we are strongly in favour of the numerous **active travel interventions** listed in Table 4.3, we are missing a clear prioritisation of those interventions as short- to medium term projects.

The **Lee to Sea Greenway (L2S)** in particular **should be a short-term delivery** as it would be a light-house project for a high-quality east-west active travel route, serving a tremendous catchment area for commuting, leisure and tourism.

The L2S must be a priority to be delivered at an early stage within the lifetime of the CDP. We fully support the very detailed submission of the Lee to Sea Greenway Steering Committee to the CDP in this regard.

We are in full support of the **concept of Mobility Hubs** as they are described in connection with the Tivoli development (see 10.256).

We, however, think, as the delivery of Tivoli will still be 10 years away, that the concept of Mobility Hubs (without the element of large scale parking) **should be piloted far earlier** in existing locations that will lend themselves for such pilot schemes (also see re Chapter 10).

We are missing a statement relating to **car-pooling**. Sharing the car journey with a higher occupancy of each vehicle is an easy to achieve way to reduce traffic load on the heavily congested road network in peak hours. Apart from a dedicated background IT infrastructure (Smart City!), very little physical infrastructure would be needed. This would mainly relate to space for parking cars at the city's periphery to continue the trip in a shared car journey to the final destination (Park+Pool). These spaces can either be brownfield sites or existing parking facilities (e.g. at shopping centres, sports arenas, ...), that are underutilised for large periods during the week.

We request that considerations should be made in the CDP how to facilitate large scale car-pooling.

We are fully supportive of **the requirements of bicycle parking** as laid out in Table 11.14. While in 11.243 it is not clear if these should also apply to existing developments.

We would strongly insist that these requirements must be met by all developments (new and existing) by 2028. Further, these should exclusively be provided by dedicated stands. We are opposed to the clause *'These can either take the form of steelwork required for other reasons (e.g. tree guards or balustrade rails' (11.243)* and ask that it be deleted.

Regarding the **numerous new roads projects** listed in the CDP, we are disappointed that despite the fact that the clear thrust of this plan is to concentrate on walking, cycling and public transport, many

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of the road projects referenced in the plan are limited access, high-capacity, motor dominated projects which seem at odds with the objectives of the rest of the plan and national commitments to reduce carbon emissions.

We are afraid that the multitude of these road projects will take investment away from where it is needed in sustainable transport, easy and fast to deliver active travel projects and housing.

[We request that all major road projects shall undergo an in-depth benefit-cost-analysis and a critical appraisal of their contribution to the overall goals of the CDP.](#)

In the light of the large scale investments into Cork's transport infrastructure and the size and importance of Cork City and County, the NTA / TII should have a local office in Cork. This would better facilitate communication with stakeholders in the process of delivering the numerous key transport projects. Further we believe that the City should be wholly responsible for the roads in the city, and split competencies (depending on road type) between TII and the City Council would be avoided. The latter is also important to address conflicts of interest between the local and national bodies, and potentially conflicting aims and goals.

[We request that a call for local offices of the NTA and TII in Cork would be included in the CDP.](#)

Chapter 5 - Climate Change and Environment

We Strongly support the draft chapter and all objectives unchanged as they are in the current draft

As stated in section 5.35 of this draft transport is responsible for 40% of Ireland's greenhouse emissions the largest of any sector (this is even more significant if the substantial proportion of emission contributed by agricultural production in Ireland for export) and 95% of those transport emissions come from road transport. Reducing the number of cars on the road, the frequency and length of journeys has to be the first priority in any greenhouse gas reduction strategy.

We welcome that this draft acknowledges the roll of modal shift, active travel, public transport, and spatial planning in this transformation. However, given how central transport is to decarbonising the city we are disappointed that transport does not have the more prominent place in this chapter and that flagship initiatives like a car free day or car-free districts in the city are not proposed.

Chapter 6

Green and Blue Infrastructure, Open Space and Biodiversity

Main points

- We support all aims and objectives in this chapter that affect transportation.
- The draught chapter is well written and to be commended
- We support the retention of any open space which has a social, amenity, nature, historic, or conservation value. However, a blanket protection of all green space may be interpreted to protect any grassy area including those of no social, amenity, nature, historic, or conservation value and hence prevent infill development, we have suggested that 6.20 includes a clarification to ensure this is not the case.

Chapter 7 - Economy and Employment

Main points

- We support the consideration of mobility given to commercial development and employment centres
- We support the clear preference given to public and active transport in the planning of commercial development and employment centres.
- We support preference shown towards location large office developments in the city centre docklands and district centres and have suggested slight modification/strengthening of the objectives referring to large office developments and strategic employment zones to make this clearer.

Chapter 8 - Heritage, Arts & Culture

- We Strongly support the objective 8.29 relating the use of upper floors of retail buildings unchanged as it is in the current draft

Chapter 9 - Environmental Infrastructure

Main points

- We support the objectives relating to the reduction of light, air & noise pollution and suggest their strengthening

Chapter 10

Key Growth Areas & Neighbourhood Development Sites

Main points

- We find the **Tivoli area development plan** to be of the highest quality, vision and detail. It is suitable as a model of best practice
- We particularly want to praise the mobility hub concept which seeks to decouple parking from individual residential units and we feel this is a model which should be applied throughout Cork City
- The floor area ratio and dwelling units/ha figures for the City docks are far too low for the indicated building heights as it yields an anomalously low site coverage figure
- We support the clear streets hierarchy and use of pedestrian/cycle streets in the City docks but oppose the routeing of through motor traffic over the new bridge and along Monahan Rd.
- We support the vision for mobility hubs in the city docks but feel that the proposed provision of 300 car parking spaces at each is an order of magnitude too many spaces and parking should be limited to circa 30 car sharing space at each mobility hub and drop-off loading zones in the rest of the city docks.
- The proposed total parking maximum in the city docklands is an order of magnitude too large at 10,280 it greater than the proposed total number of dwellings, this needs to be radically reduced.
- Cork airport business park is not a suitable location for office developments as it is in an isolated location which relies on a single congested public transport link and is inaccessible by walking or cycling

Chapter 11 - Placemaking and Managing Development

Main points

- We support Sustainable Residential Development Objectives which are well thought out comprehensive except a reference to permeability needs added.
- Building Height Standards is very well thought out and executed except we think that historic buildings should be given more weight in determining the character of the city centre rather than simply the mean height of all buildings.
- Density Building Height Standards are a welcome improvement but still fall short of being able to achieve critical population density needed to ensure the viability of local services and therefore end car dependency.
- Maximum Car Parking Standards are slightly higher than we would ideally like in some cases but general represent real progress. We feel that measures to decouple parking from

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development (as in Tivoli ch 10) and limit free parking as if not more important than further reductions in the parking minimums

Conclusion

Cork City needs a fundamental change in its travel system given the city's planned growth in population and employment, in order to maintain accessibility, meet emission reduction targets (climate change), improve public health (noise, air quality, physical activity levels, ...) and to improve the City's citizen's general quality of life and hence the City's attractiveness as a whole.

Public transport and active travel (cycling and walking) must become the default modes of city travel, and be given priority, if all city parts shall remain accessible given the predicted growth in population and employment.

Every suitable measure is needed to tackle car dependency and to reduce the need to do a single occupancy car journey. International best practice shall thoroughly be examined and where possible applied to Cork.

All city planning must ensure that all parts of the city are duly accessible by public transport and active travel in order to support a transition to a low-car city as vital condition to keep city accessible, and to a low-carbon economy to meet Ireland's carbon emission targets.

The directing of large parts of predicted growth in population and employment into public transport corridors, brownfield and infill sites is welcome and finds our full support. The idea of higher densities in such corridors, and the proximity of homes to shops, schools, services and workplaces is essential. Access to new developments must have a strong emphasis on active travel and public transport. Retrofit of existing urban fabrics must happen accordingly. The public realm and urban design shall see an upgrade in the city centre as well as in neighbourhoods and urban villages with the needs and comfort of pedestrians of all ages and abilities on top of the priority list, to create vibrant and pleasant spaces in successful neighbourhoods and communities.

As planning is a long-term process, the right decisions must be taken now to move the future development of the City into the right direction for an attractive, mobile, pleasant, healthy, successful and sustainable Cork.

As transport and mobility in particular are the result of many surrounding factors, a holistic, collaborative and cross-sectoral approach with innovative partnerships is needed in this long-term process. We trust that the City Council will act in this direction and be given the necessary resources to lead this tremendous task.

We hope that this comprehensive submission, concentrating on the wider transport and mobility aspects, will help finalise a robust, forward thinking and future proof new City Development Plan to shape Cork well into the 2030s and support a sustainable development of the City that has the right responses to the overarching challenges, first and foremost to the City's growth and to Climate Change, for decades to come.



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We would be obliged to further participate in the discourse and planning processes around the development of Cork's 2022-2028 City Development Plan. It would be most helpful if TMF would be listed as a notifiable stakeholder forum as we feel that TMF can provide a valuable input into the process. Please do not hesitate to contact us at any time under tmfcork@gmail.com.

Kind regards

Stephan Koch

Transport and Mobility Forum – Acting Chair

Darren McAdam-O'Connell

Transport and Mobility Forum – Coordinator

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

Appendix:

Detailed comments of individual objectives that are related to and impact on the wider topic of Transport and Mobility

For better legibility, request for amendments to the draft CDP are printed in **BLUE**.

Chapter 2 Core Strategy

Main points

- We strongly support the vast majority of aims and objectives laid out in chapter 2 particularly the focus on compact growth and the 15-minutes City
- The quality of vision and execution of the draught chapter is to be commended
- However, we are concerned that the low-level of tier 1,2 & 3 lands identified in table 2.3 for development in the city centre and to a lesser extent in the Docklands does not truly reflect the level of derelict and underutilized sites in the city centre. Failing to identify more that 2Ha. of land for redevelopment in the city centre threatens the delivery compact growth and a 15min city.

We Strongly support the following objectives unchanged as they are in the current draft

Objective 2.1

Objective 2.2

Objective 2.4

Objective 2.5

Objective 2.6

Objective 2.7

Objective 2.10

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Objective 2.11

Objective 2.15

Objective 2.16

Objective 2.17

Objective 2.18

Objective 2.20

Objective 2.21

Objective 2.27

Objective 2.31

Objective 2.32

Objective 2.33

Objective 2.34

Objective 2.35

Objective 2.36

We support the following objectives and suggest the following modification/additions to strengthen their effectiveness in achieving the Strategic objectives laid out at the beginning of Chapter 2

Objective 2.8

Existing text

The 15-Minute City

To support the delivery of a 15-Minute City delivering Compact Liveable Growth through walkable neighbourhoods, towns and communities with a mix of uses, house types and tenures that foster a diverse, resilient, socially inclusive and responsive city. Strategic infrastructure and large-scale developments shall demonstrate how they contribute to a 15 minute city and enhance Cork City's liveability.

Suggested Strengthening

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The 15-Minute City

To support the delivery of a 15-Minute City delivering Compact Liveable Growth through walkable neighbourhoods, towns and communities with a mix of uses, house types and tenures that foster a diverse, resilient, socially inclusive and responsive city. [Strategic infrastructure and developments shall demonstrate how they contribute to a 15 minute city and enhance Cork City's liveability. Large-scale developments shall demonstrate how they achieve a 15 minute city and enhance Cork City's liveability.](#)

Objective 2.9

Existing text

Low Carbon City

Support the delivery of a lower carbon, sustainable city where development avoids, mitigates and adapts to the effects of climate change while protecting and enhancing Cork City's environmental assets.

Suggested Strengthening

Addition of the following sentence.

Strategic infrastructure and large-scale developments shall demonstrate how they contribute to lower Carbon Emissions.

To give

Low Carbon City

Support the delivery of a lower carbon, sustainable city where development avoids, mitigates and adapts to the effects of climate change while protecting and enhancing Cork City's environmental assets. [Strategic infrastructure and large-scale developments shall demonstrate how they contribute to lower Carbon Emissions.](#)

Objective 2.12

Existing text

Walkable Neighbourhoods

New development shall be designed to make positive additions to their neighbourhoods, towns and communities by:

- a. Delivering the right mix of uses at a scale and design that creates high quality buildings and spaces.

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- b. Creating attractive, safe and vibrant places designed at a human scale (i.e. places that relate to people, streetscapes and local character).
- c. Ensuring a child friendly and age friendly environment with a mix of household types.
- d. Designing a safe place that enables access for all.
- e. Creating a healthy neighbourhood with direct access to high quality parks and public spaces.
- f. Being well-connected with easy access to public transport and active travel.
- g. Providing enhanced permeability for walking and cycling.

Suggested Strengthening

Addition of the following two clauses.

- h. Non-residential developments shall be located so as to be accessible to the majority of their staff and customers by foot.
- i. Residential developments shall ensure that the majority of everyday services and a high frequency public transport link to other services, education and employment are available within a 15 min walk of all residences.

To give

Walkable Neighbourhoods

New development shall be designed to make positive additions to their neighbourhoods, towns and communities by:

- a. Delivering the right mix of uses at a scale and design that creates high quality buildings and spaces.
- b. Creating attractive, safe and vibrant places designed at a human scale (i.e. places that relate to people, streetscapes and local character).
- c. Ensuring a child friendly and age friendly environment with a mix of household types.
- d. Designing a safe place that enables access for all.
- e. Creating a healthy neighbourhood with direct access to high quality parks and public spaces.
- f. Being well-connected with easy access to public transport and active travel.
- g. Providing enhanced permeability for walking and cycling.

h. Non-residential developments shall be located so as to be accessible to the majority of their staff and customers by foot.

i. Residential developments shall ensure that the majority of everyday services and a high frequency public transport link to other services, education and employment are available within a 15 min walk of all residences.

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Objective 2.19

Existing text

Windfall Sites

Strategic brownfield sites with existing active uses will be treated as windfall sites. The redevelopment of these sites, if or when they become available, will require careful consideration. For such sites, Cork City Council will require agreement on a detailed framework plan at an early stage to ensure best practice regeneration and design based on the character and nature of their existing urban environments.

Suggested Strengthening

Windfall Sites

Strategic brownfield sites with existing active uses will be treated as windfall sites. The redevelopment of these sites, if or when they become available, will require careful consideration. For such sites, Cork City Council [will require agreement on a detailed framework plan produced in conjunction with a process of public consultation at an early stage to ensure best practice regeneration and design based on the character and nature of their existing urban environments.](#)

Objective 2.23

Existing text

Quality of Life

In planning for future population growth, Cork City Council will assess and monitor quality of life factors including improvements in the urban environment, community infrastructure and cultural experiences that can increase the numbers of people seeking to live, work, study, visit and experience the city.

Suggested Strengthening

Quality of Life

In planning for future population growth, Cork City Council will assess and monitor quality of life factors including improvements in the urban environment, community infrastructure, [reducing average commute/journey distance](#) and cultural experiences that can increase the numbers of people seeking to live, work, study, visit and experience the city.

Objective 2.26

Existing text

Housing Supply

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Support an increase in the supply, affordability and quality of new housing in city and provide a range of housing options delivering good design that is appropriate to the character of the area in which it is built.

Suggested Strengthening

Housing Supply

Support an increase in the supply, affordability and quality of new housing in city and provide a range of housing options delivering good design [that is both of a compact urban character](#) and is appropriate to the character of the area in which it is built.

Objective 2.28

Existing text

Supply of Zoned Land

Monitor and review the Core Strategy to ensure that sufficient zoned land continues to be available to meet the City's housing requirements over the lifetime of the Plan.

Suggested Strengthening

Supply of Zoned Land

Monitor and review the Core Strategy to ensure that sufficient zoned land, [close to employment, services and education](#), continues to be available to meet the City's housing requirements over the lifetime of the Plan.

Objective 2.30

Existing text

Managing the Hinterland

Any development proposals in the remainder of the hinterland will be closely managed to protect against unnecessary and unplanned urban sprawl.

Suggested Strengthening

Managing the Hinterland

Any development proposals in the hinterland will be closely managed to protect against unnecessary and unplanned urban sprawl [and shall not be accessed by car by residents, employees or customers](#)

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We believe that the following objectives need modification to avoid conflict with the Strategic objectives laid out at the beginning of Chapter 2 and we cannot support without the following modifications.

Objective 2.24 Core Strategy

Existing text

To implement and support the delivery of the Core Strategy in accordance with the Core Strategy Map and Table, the Growth Strategy Map and Table and the Objectives for City Growth Table set out in this plan.

We have no issue with the text of this objective but we have a serious issue with the figures in table 2.2 as it concentrates growth in the most distant and low-density parts of the city. A commitment to compact growth implies a preference to concentrate growth in the most central parts of the city and in communities that can accommodate the highest densities. We believe that this one table will define any possible changes in the city's transport mix and so is of the utmost importance.

Reasoning for the prioritisation of growth in central city areas.

The core goal of the Cork transport and mobility forum is enabling people to travel in a way that is more sustainable and has less of a negative impact on their health and quality of life. This is to a large degree dependent on enabling people to switch from private motor vehicles to public and active transport. But it is also so about ensuring that people do not have to travel excessive distances to meet their everyday needs. Improving mobility is not about increasing the number of kilometres people can travel easily rather it is about minimising the number of kilometres you need to travel to make all the journeys you desire. By bringing trip generators closer together and improving permeability people can make more trips per day living more fulfilling and productive lives at the same time as spending less time and resources on travel.

The key determinant of this vision of improved mobility, which is well supported throughout this draft plan, comes to pass is not any dedicated transport intervention but rather ensuring homes and services are built closer together.

Why sustainable transport requires density

Table 2.2 to and table 11.2 in chapter 11 are the key determinants of transport in the Cork region over the coming decade. It is vital that these deliver compact growth bringing trip generators closer

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together lowering the distances that need to be travelled allowing both a change in the modal distribution away from the private car and meaning that if people drive they don't have to drive as far. The real goal is to achieve a 10/15 min community for the majority of the population. This can only happen when a critical density of homes and service come within a 10/15 minutes' walk. This requires mixed use, good permeability but also an absolute minimum of circa 100 residential units/ha to support the number and variety of services within walking distance.

Given that it will not be possible to develop at as high a density in suburban towns as in the urban core while respecting their suburban character it will not be possible to achieve the strategic objectives outlined at the beginning of chapter 2 the requirement under the national planning framework and regional spatial and Economic Strategy for compact growth or achieve a 15-minute City if growth is concentrated in what are at present the lowest density and most isolated areas of the city.

The requirement for city centre housing

The greatest demand for housing is in the city centre within walking distance of employment services and amenities. There is at present, before any further growth occurs, a very significant unmet demand for housing in this area. This is having already a very significant adverse effect on the competitiveness of Cork City, the region and Ireland as a whole as a substantial number of those attracted here for employment are leaving because they are unable to find housing in the city centre where they desire to live. There are also a very significant numbers of people who desire to live in the city centre forced commuting from the outer Suburbs at great cost to their quality of life and health while placing significant burden on our transport infrastructure and increasing traffic congestion.

The commitment to achieve compact urban growth, the strategic objectives outlined in at the beginning of chapter 2 and the commitment to a 15-minute City means that the priority for providing housing must be to first provide as much housing as possible within walking distance of the city centre and the lowest priority for providing housing should be in areas of suburban character which are inaccessible by walking and cycling. Providing more low-density housing of a suburban character or housing which encourages commuting is directly in contravention to the requirement for compact urban growth, the strategic objectives outlined in chapter 1 and the commitment to a 15-minute City. Table 2.2 shows only 7% of the residential development within the city centre & 12.2% in the docklands this substantially below what is required to satisfy the exiting pent-up demand for accommodation in the city centre before allowing for any further growth.

A reassessment of the area of underutilised land in the city centre is required

We recognise that the low figure for the city centre is due to the low level of available land identified in Tables 2.3 & 2.4. We have real difficulty however accepting a figure of only 2ha as the total amount of underutilised land in in the city centre. A cursory examination by members identified 16 ha of vacant derelict or underutilised land in the city centre. This assessment is clearly based on inadequate data and [needs to be urgently re assessed](#).

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We would suggest in the interim that the plan commits to identifying the maximum amount of underutilised land in the city centre and encouraging its redevelopment in accordance with objectives 2.17 & 2.18

Suggested improvements to table 2.2

The increase in population of 6,070 for the dock lands in Table 2 implies the developments of only 3,000 units covering either

A; just under 10ha (at a medium urban density of 325 units/ha as per recent 3-6 story city centre apartment completions, 2.08 person household size and 3% vacancy) or

B; the 16.8 ha of Tier 1&2 sites referred to in Table 2.3 at only 155 unit/ha in the city docks and 83 units/ha in Tivoli (below the minimum density outlined in table 11.2)

of the 115.96ha of the docklands excluding Tivoli, Marina Park and Custom house/river channel areas.

Developing those 16.8 ha at a medium urban density of 325 units/ha ha would yield a population increase 11,016 or 14527 at 500 units/ha a more respectable 22.2-29.3% of targeted population growth

Targeting 20% of the area for residential development within the lifetime of this plan (requiring the development of 6.4ha or 9.3% of tier 3 lands identified in Table 2.4) at 325 units/ha would yield a population increase 15,208 or 23,396 at 500 units/ha a significant 30.7-47.2% of targeted population growth where all the Strategic objectives of this plan the vision of the NPF and a 15 min city would be easily achieved while boosting regional competitiveness by providing accommodation that would attract international talent which will otherwise not consider Cork. This would also remove the need to develop more remote greenfield sites at densities which will not achieve the compact growth required.

Objective 2.25

We support in the strongest possible terms the objective of compact growth and acknowledge the substantial progress towards that objective in this draft.

However, given the already large footprint of Cork City, even if 100% of projected population growth was to occur within the existing footprint of the city the majority of Communities would still suffer from population densities far below that which constitute compact settlement or which allow a 15-minute city to be a reality. Therefore, it is vital to achieving the strategic objectives set out in chapter 1 that sufficient new housing development take place within the existing footprint to allow compact growth and the achievement of a 15 min city, any development outside the existing footprint delays this for existing communities. In this context we cannot support the 65% target for housing within in the existing footprint. While recognising the challenges of providing sufficient housing to meet the necessarily ambitious targets for home building and the significant problems associated with lack of supply, we request that this 65% target is revised substantially up, to ensure compact growth and

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the greatest possible number of existing communities are developed sufficiently to allow the 15-minute city to become a reality within those communities.

Existing text

Compact Growth

It is an objective to target the delivery of 65% of all new homes in Cork City on lands within the existing built footprint of the city, as set out in the Core Strategy.

Suggested Strengthening

This target should be increased as much as possible.

Chapter 3

Delivering Homes and Communities

Main points

- We strongly support the vast majority of aims and objectives laid out in chapter 3 particularly the focus on compact growth and the 15-minutes City
- The quality of vision and execution of the draught chapter is to be commended
- We have suggested some slight [modification/strengthening of some objectives to better support the provision of infill development](#).

We Strongly support the following objectives unchanged as they are in the current draft

Objective 3.1

Objective 3.2

Objective 3.5 (not withstanding our comments on chapter 11 standards referred to in the objective)

Objective 3.6

Objective 3.8

Objective 3.11

Objective 3.12

Objective 3.14

Objective 3.15

Objective 3.16

Objective 3.17

Objective 3.18

Objective 3.19

Objective 3.20

Objective 3.21

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Objective 3.22

Objective 3.25

Objective 3.26

Objective 3.27

Objective 3.28

Objective 3.29

Objective 3.31

Objective 3.32

Objective 3.33

We support the following objectives and suggest the following modification/additions to strengthen their effectiveness in achieving the Strategic objectives laid out at the beginning of Chapter 2

Objective 3.3

New Housing Supply

We Strongly support the parts a, b, c, d, e, f & g of this objective unchanged as they are in the current draft.

We request the follow addition to strengthen its effectiveness

Existing text

Objective 3.3

New Housing Supply

Provision will be made for at least 17,118 new homes to be built in Cork over the Development Plan period. This will be achieved by:

- a. Zoning sufficient lands for residential or a mix of residential and other uses to facilitate the delivery of housing;
- b. Designating Transformational sites capable of delivering new homes;
- c. Utilising the Cork City Capacity Study prepared as an input into this Plan to identify the development potential of sites capable of residential development;

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- d. Active land management utilising the provisions of the Derelict Sites Act 1990 and Urban Regeneration and Housing Act 2015;
- e. Optimising the potential of brownfield sites (see Objective 3.4);
- f. Actively encouraging the re-use of vacant space within existing buildings (especially built heritage assets and those in the City Centre) and vacant homes by utilising all instruments at Cork City Council's disposal;
- g. Ensuring that all new housing developments contribute to the creation and / or maintenance of successful neighbourhoods and are designed to the highest standards (see Chapter 11: Placemaking and Managing Development).

Suggested Strengthening

Objective 3.3

New Housing Supply

Provision will be made for at minimum of 17,118 new homes to be built in Cork over the Development Plan period. This will be achieved by:

- a. Zoning sufficient lands for residential or a mix of residential and other uses to facilitate the delivery of housing;
- b. Designating Transformational sites capable of delivering new homes;
- c. Utilising the Cork City Capacity Study prepared as an input into this Plan to identify the development potential of sites capable of residential development;
- d. Active land management utilising the provisions of the Derelict Sites Act 1990 and Urban Regeneration and Housing Act 2015;
- e. Optimising the potential of brownfield sites (see Objective 3.4);
- f. Actively encouraging the re-use of vacant space within existing buildings (especially built heritage assets and those in the City Centre) and vacant homes by utilising all instruments at Cork City Council's disposal;
- g. Ensuring that all new housing developments contribute to the creation and / or maintenance of successful neighbourhoods and are designed to the highest standards (see Chapter 11: Placemaking and Managing Development).
- h. Actively encouraging the re-use of underutilised public and private space, such as parking areas and large gardens, in existing low-density suburbs for infill housing.

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i. Actively encouraging the division of large residential sites in existing low-density suburbs into two or more small sites.

Objective 3.4

Compact Growth

We support in the strongest possible terms the objective of compact growth, all of the measures a to o which are part of this objective and acknowledge the substantial progress towards that objective in this draft.

However, given the already large footprint of Cork City, even if 100% of projected population growth was to occur within the existing footprint of the city the majority of Communities would still suffer from population densities far below that which constitute compact settlement or which allow a 15-minute city to be a reality. Therefore, it is vital to achieving the strategic objectives set out in chapter 1 that sufficient new housing development take place within the existing footprint to allow compact growth and the achievement of a 15 min city, any development outside the existing footprint delays this for existing communities. In this context we cannot support the 66% target for housing within in the existing footprint. While recognising the challenges of providing sufficient housing to meet the necessarily ambitious targets for home building and the significant problems associated with lack of supply, we request that this 66% target is revised substantially up, to ensure compact growth and the greatest possible number of existing communities are developed sufficiently to allow the 15-minute city to become a reality within those communities.

In particular we ask that [measures are included to encourage and more ambitious targets are set for small scale infill in existing low density suburbs particularly old inner suburbs](#), one off houses in the suburbs where suburban houses on inappropriately large plots could have an extra dwelling built in the rear or to the side and where older suburban housing on large plots is to be demolished and redeveloped that there would be a presumption that planning would only be given for higher urban appropriate densities.

We cannot overemphasize how important it is that existing communities with no available undeveloped land are able host infill development in order to increase residential density to a level where a 15 min city is possible. With out this infill and subsequent increase in density the majority of existing suburban communities in the city will never be able to move away from car dependence and isolation so risk becoming the ghettos of the future where those unable to afford to move to “new” walkable communities will be also for saddled with higher transport costs, isolation and exclusion from opportunities and services.

Existing text

Objective 3.4

Compact Growth

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Cork City Council will seek to ensure that at least 66% of all new homes will be provided within the existing footprint of Cork. Cork City Council will seek to ensure that at least 33% of all new homes will be provided within brownfield sites in Cork. Optimising the potential for housing delivery on all suitable and available brownfield sites will be achieved by:

- a. Cork City Council acting as a development agency to kickstart regeneration of sites and buildings, utilising acquisition as required;
- b. Progress housing and employment delivery in urban centres and strategic regeneration sites;
- c. Active land management utilising the range of tools available (including the Derelict Sites Act 1990 and the Urban Regeneration and Housing Act 2015);
- d. The redevelopment of surplus utility and public sector owned sites;
- e. The development of small sites and the re-use of existing designated and undesignated built heritage assets on those sites;
- f. The utilisation of planning and urban design tools to provide a framework for the development of sites (e.g. masterplanning, framework plans, neighbourhood strategies, historic area regeneration strategies, site specific briefs);
- g. Optimising the use of land (see PO HSC3: Density of development, below);
- h. Establishing ambitious and achievable buildout rates at the planning stage to help ensure that homes are built quickly and to reduce the likelihood of permissions being sought to sell land on at a higher value;
- i. Influencing Government to update the legislative, guidance, fiscal and financial framework to the benefit of housing delivery on brownfield sites;
- j. Combining its role as planning authority and housing authority to bring about residential development to meet demand and need;
- k. Where new sustainable transport infrastructure is planned land use designations will be reviewed and updated, where appropriate to provide for housing or mixed use development (including housing);
- l. Unlock the development potential of brownfield sites to be used as an evidence base and business case for intervention; and
- m. Ensuring that all new housing developments contribute to the creation and / or maintenance of successful neighbourhoods.
- n. Identify and promote the development potential of brownfield, small sites, regeneration areas and infrastructure packages to enable progress towards achieving compact growth targets.
- o. Encourage the retrofitting and reuse of existing buildings, rather than their demolition and reconstruction

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Suggested Strengthening

Objective 3.4

Compact Growth

Cork City Council will seek to ensure that at least 90% of all new homes will be provided within the existing footprint of Cork. Cork City Council will seek to ensure that at least 50% of all new homes will be provided within brownfield (including subdivision of existing suburban residential sites) sites in Cork. Optimising the potential for housing delivery on all suitable and available brownfield sites will be achieved by:

- a. Cork City Council acting as a development agency to kickstart regeneration of sites and buildings, utilising acquisition as required;
- b. Progress housing and employment delivery in urban centres and strategic regeneration sites;
- c. Active land management utilising the range of tools available (including the Derelict Sites Act 1990 and the Urban Regeneration and Housing Act 2015);
- d. The redevelopment of surplus utility and public sector owned sites;
- e. The development of small sites and the re-use of existing designated and undesignated built heritage assets on those sites;
- f. The utilisation of planning and urban design tools to provide a framework for the development of sites (e.g. masterplanning, framework plans, neighbourhood strategies, historic area regeneration strategies, site specific briefs);
- g. Optimising the use of land (see PO HSC3: Density of development, below);
- h. Establishing ambitious and achievable buildout rates at the planning stage to help ensure that homes are built quickly and to reduce the likelihood of permissions being sought to sell land on at a higher value;
- i. Influencing Government to update the legislative, guidance, fiscal and financial framework to the benefit of housing delivery on brownfield sites;
- j. Combining its role as planning authority and housing authority to bring about residential development to meet demand and need;
- k. Where new sustainable transport infrastructure is planned land use designations will be reviewed and updated, where appropriate to provide for housing or mixed use development (including housing);
- l. Unlock the development potential of brownfield sites to be used as an evidence base and business case for intervention; and

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- m. Ensuring that all new housing developments contribute to the creation and / or maintenance of successful neighbourhoods.
- n. Identify and promote the development potential of brownfield, small sites, regeneration areas and infrastructure packages to enable progress towards achieving compact growth targets.
- o. Encourage the retrofitting and reuse of existing buildings, rather than their demolition and reconstruction
- p. Actively encouraging the re-use of underutilised public and private space, such as parking areas and large gardens, in existing low-density suburbs for infill housing.
- q. Actively encouraging the division of large residential sites in existing low-density suburbs into two or more small sites.

Objective 3.9

Adaptation of Existing Homes Infill Development and Conversion of Upper Floors

This objective references NPO 34 (National Policy Objective 34 Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time.) but appears to support both NPO 34 & NPO 35 (National Policy Objective 35 Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.)

We strongly support NPO 34, NPO 35 as well as the intent of Objective 3.9 and suggest the following rewording for clarity and to full reflect both NPO 34 & NPO 35.

Existing text

Objective 3.9

Adaptation of Existing Homes Infill Development and Conversion of Upper Floors

Cork City Council will support and encourage the adaptation of existing homes consistent with NPO 34 of the NPF infill development and the conversion of upper floors in commercial areas in principle to ensure that homes small sites and vacant space are utilised for new housing supply whilst still ensuring high standards of residential amenity for existing adjoining homes.

Suggested Strengthening

Objective 3.9

Adaptation of Existing Homes Infill Development and Conversion of Upper Floors

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Cork City Council will support and encourage the adaptation of existing homes and communities consistent with NPO 34 & NPO 35 of the NPF by:

- a. Supporting and encouraging the adaptation of existing homes to reflect an aging population and changing communities
- b. Supporting and encouraging infill development to ensure that homes small sites and vacant space are utilised for new housing supply whilst still ensuring high standards of residential amenity for existing adjoining homes.
- c. Supporting and encouraging the conversion of upper floors in commercial areas in principle.

Objective 3.13

Rural Generated

Existing text

Objective 3.13

Rural Generated

Housing

- a. To sustain and renew established rural communities, by facilitating those with a rural generated housing need to live within their rural community.
- b. To discourage urban generated housing in the City Hinterland.
- c. The City Hinterland is the area under strongest urban generated pressure for rural housing. Therefore, single rural housing applicants must satisfy Cork City Council that their proposal constitutes an exceptional rural generated housing need and satisfies all the requirements of this

Suggested Strengthening

Objective 3.13

Rural Generated

Housing

- a. To sustain and renew established rural communities, by facilitating those with a rural generated housing need to live within their rural community.
- b. To discourage urban generated housing in the City Hinterland.
- c. The City Hinterland is the area under strongest urban generated pressure for rural housing. Therefore, single rural housing applicants must satisfy Cork City Council that their proposal

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constitutes an exceptional rural generated housing need and satisfies all the requirements of this Plan. Any application for the development of a single rural dwelling must set out a comprehensive and conclusive demonstrable economic or social need to live in a rural area, including demonstrating that the dwelling will prevent the need to commute to the location rather than result in commuting from the dwelling.

Objective 3.30 Social Inclusion

Existing text

Objective 3.30

Social Inclusion

- a. To support policies, strategies and plans that address social inclusion.
- b. To actively engage with all sectors of the community to encourage public participation;
- c. To support economic development, urban regeneration, lifelong learning and the development of community facilities in more socially and economically disadvantaged parts of the City.

Suggested Strengthening

Objective 3.30

Social Inclusion

- a. To support policies, strategies and plans that address social inclusion.
- b. To actively engage with all sectors of the community to encourage public participation;
- c. To support economic development, urban regeneration, lifelong learning and the development of community facilities in more socially and economically disadvantaged parts of the City.
- d. To ensure that disadvantaged communities do not suffer from isolation, health, social and economic damage from car dependency and lack of access to public and active travel opportunities.

Objective 3.23 School Facilities

Existing text

Objective 3.23

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School Facilities

- a. To work closely with the Department of Education in planning for the delivery of new schools in-step with new housing development within the city.
- b. To ensure that new school sites are made available in accordance with the requirements of the Department of Education.
- c. To encourage the co-location of schools as part of education campuses and with other community uses to create community hubs. This could facilitate the sharing of halls, playing fields and courts where feasible.

Suggested Strengthening

Objective 3.23

School Facilities

- a. To work closely with the Department of Education in planning for the delivery of new schools in-step with new housing development within the city.
- b. To ensure that new school sites are made available in accordance with the requirements of the Department of Education.
- c. To encourage the co-location of schools as part of education campuses and with other community uses to create community hubs. This could facilitate the sharing of halls, playing fields and courts where feasible.
- d. To ensure that new school sites are safely and conveniently accessible via walking and cycling.
- e. To encourage new school sites to minimise access via private cars.
- d. To ensure that the vicinity of new school sites is free from traffic risk including a 30kph speed limit and other measure to reduce traffic.

Objective 3.24

Third-Level Education and Further Education

Existing text

Objective 3.24

Third-Level Education and Further Education

Transport & Mobility Forum

- a. To support the ongoing development and provision of third level education, further education and lifelong learning in the City.
- b. To work with the education providers to ensure their facilities can be upgraded and expanded to meet their requirements.
- c. To work with the education providers in promoting and facilitating measures (such as the Higher Education Access Route and ACCESS+) which seek to extend education opportunities to representatives from socially and economically disadvantaged backgrounds.
- d. To facilitate and promote synergies between education, industry and entrepreneurship with an emphasis on retaining talent in the City, facilitating the expansion of existing economic clusters and the establishment of new clusters, and increasing participation in the City's labour force.

Suggested Strengthening

Objective 3.24

Third-Level Education and Further Education

- a. To support the ongoing development and provision of third level education, further education and lifelong learning in the City.
- b. To work with the education providers to ensure their facilities can be upgraded and expanded to meet their requirements.
- c. To work with the education providers in promoting and facilitating measures (such as the Higher Education Access Route and ACCESS+) which seek to extend education opportunities to representatives from socially and economically disadvantaged backgrounds.
- d. To facilitate and promote synergies between education, industry and entrepreneurship with an emphasis on retaining talent in the City, facilitating the expansion of existing economic clusters and the establishment of new clusters, and increasing participation in the City's labour force.
- e. To ensure that new educational developments are safely and conveniently accessible via walking and cycling.
- f. To encourage new educational developments to minimise access via private cars.
- g. To ensure that the vicinity of new educational developments is free from traffic risk including a 30kph speed limit and other measure to reduce traffic.

Objective 3.34

Safe and Secure City

Existing text

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Objective 3.34

Safe and Secure City

- a. To ensure a well-integrated urban form that provides a safe environment for all users by maximising visibility and surveillance, increasing pedestrian activity and maximising connections between areas.
- b. To encourage buildings and spaces to be designed with safety and security in mind to avoid anti-social behaviour, reduce and prevent crime and create safe places for all.
- c. To encourage the ongoing maintenance and upkeep of the public realm, keeping spaces free of graffiti and litter etc.

Suggested Strengthening

Objective 3.34

Safe and Secure City

- a. To ensure a well-integrated urban form that provides a safe environment for all users by maximising visibility and surveillance, increasing pedestrian activity and maximising connections between areas.
- b. To encourage buildings and spaces to be designed with safety and security in mind to avoid anti-social behaviour, reduce and prevent crime and create safe places for all.
- c. To encourage the ongoing maintenance and upkeep of the public realm, keeping spaces free of graffiti and litter etc.
- d. To ensure all ages and all abilities can safely walk, cycle, socialise and play on the city's streets without fear of traffic or harassment from drivers.

Chapter 5

Climate Change and Environment

We Strongly support the draft chapter and all objectives unchanged as they are in the current draft

As stated in section 5.35 of this draft transport is responsible for 40% of Ireland's greenhouse emissions the largest of any sector (this is even more significant if the substantial proportion of emission contributed by agricultural production in Ireland for export) and 95% of those transport emissions come from road transport. Reducing the number of cars on the road, the frequency and length of journeys has to be the first priority in any greenhouse gas reduction strategy.

We welcome that this draft acknowledges the roll of modal shift, active travel, public transport, and spatial planning in this transformation. However, given how central transport is to decarbonising the city we are [disappointed that transport does not have the more prominent place in this chapter and that flagship initiatives like a car free day or car-free districts in the city are not proposed.](#)

Chapter 6

Green and Blue Infrastructure, Open Space and Biodiversity

Main points

- We support all aims and objectives in this chapter that affect transportation.
- The draft chapter is well written and to be commended
- We support the retention of any open space which has a social, amenity, nature, historic, or conservation value. However, a blanket protection of all green space may be interpreted to any grassy area including those of no social, amenity, nature, historic, or conservation value and hence prevent infill development, [we have suggested that 6.20 includes a clarification to ensure this is not the case.](#)

We Strongly support the following objectives unchanged as they are in the current draft

Objective 6.16

Objective 6.17

Objective 6.18

Objective 6.19

Objective 6.20 a.

Objective 6.20 c.

Objective 6.20 d.

Objective 6.20 e.

Objective 6.20 f.

We believe that objective 6.20 b. needs modification to avoid conflict with the Strategic objectives laid out in chapter one and we cannot support without the following modifications.

We support the retention of and increase in open space which has a social, amenity, nature, historic, or conservation value.

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However, a blanket protection of all green space may be interpreted to include small areas of grass which were included in suburban design to meet past planning requirement to develop at unsustainably low density and have an antisocial effect while having no social, amenity, historic or conservation value. These past requirements to develop suburban areas at lower density with large areas of open space has been shown to have severe negative effects on communities leading to car dependency, isolation, lack of retention of community services, antisocial behaviour etc. This legacy needs to be undone to achieve the requirement for compact growth in the national planning framework, the strategic objectives outlined in chapter 1 and the vision for a 15-minute City not protected.

In particular, 1-2m wide strips of grass are commonly found between the road and pavement and between the pavement and the boundary wall or fence. These spaces have been shown to have severe negative effect on communities by lowering density increasing journey length and hence promoting car dependency. Also, as they are not of a human scale they are perceived as desolate rather than social spaces and so are rarely used for amenity purposes. The strips of grass along roads serve to visually widen the road increasing speeds and decreasing safety, comfort and amenity for pedestrians and cyclists while lowering the density of communities. This acts to isolate people far from services amenities and social interaction.

A key to achieving compact growth and a 15-minute City is infilling existing low-density suburban areas with housing and services, to first increase the population density to provide a sufficient population within walking distance to support local services and then the further infill with those local services. The space to do this needs to be primarily taken from Road space, parking space but also these small left over grassy spaces which provide no amenity or nature value.

A blanket assumption of protection for these antisocial spaces lacking in nature value directly conflicts with the requirement for compact growth in the national planning framework, the strategic objectives outlined in chapter 1 and the vision for a 15-minute City. At a minimum Objective 6.20 b needs to be rewritten to specifically exclude spaces of this type while ideally another sub objective should be added to aim to audit the green space in the city to identify grassed over areas which have no amenity or nature value, act as an antisocial space and therefore should be used as infill for housing, genuine amenity, or conservation space (playgrounds or community garden for example) or community services.

Existing text

Objective 6.20

b. There will be presumption against development on all open space in residential estates in the city, including any green area / public amenity area that formed part of an executed planning permission for development and was identified for the purposes of recreation / amenity open space, and also including land which has been habitually used as public open space. Such lands shall be protected for recreation, open space and amenity purposes.

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Suggested alternative text.

Objective 6.20

b. There will be presumption against development on open space which has been habitually used as public open space, where these spaces have any significant social, amenity, nature or conservation value. Such lands shall be protected for recreation, open space and amenity purposes. This protection should not apply to narrow strips of grass along or between roads and paths or to overly large gassy areas which are perceived as desolate attracting anti-social behaviour which may be reduced to a more human scale to enhance its amenity value.



Above an example of open space which has a significant social, amenity, nature, historic, or conservation value.



To the side an example of a small "leftover" open space which has no social, amenity, nature, historic, or conservation value.

Are are examples of narrow grass strips which have no significant social, amenity, nature, historic, or conservation value. And should not be considered open space requiring protection and provides opportunities for infill



Chapter 7

Economy and Employment

Main points

- We support the consideration of mobility given to commercial development and employment centres
- We support the clear preference given to public and active transport in the planning of commercial development and employment centres.
- We support preference shown towards location large office developments in the city centre docklands and district centres and [have suggested slight modification/strengthening of the objectives referring to large office developments and strategic employment zones to make this clearer.](#)

Mobility Management

We feel that mobility management plans are an important tool in ensuring that we achieve compact growth, the strategic objectives outlined in chapter 1 and the vision for a 15-minute City.

We therefore strongly support objective 7.8

Objective 7.8

Mobility Management Plans

In addition to traffic impact assessments, Cork City Council will encourage all planning applications for new employment uses, or extensions to existing commercial premises, for 100 or more employees to prepare mobility management plans which promote and prioritise the use of more sustainable transport modes.

[We request that consideration is given to lowering the criteria for drawing up mobility management plans from 100 to 50 employees](#)

[We also request that another objective is inserted objective 7.x](#)

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There will be presumption against developments providing free or subsidised parking for staff or customers, except for disabled parking and loading bays.

The subsidization of parking by businesses is paid for by everybody not just those who drive and incentivises driving as the cost is borne by everybody not just those driving and is in conflict with the strategic objective outlined in chapter 1.

Strategic employment zones

There needs to be a general assumption that retail, general office accommodation, call centres etc the located in the centre of dense walkable neighbourhoods such as the city centre, the Docklands but also in the district centres outlined in this plan. We welcome that this is clearly envisioned in the draft plan and suggest a slight strengthening in the flowing objectives to ensure this overall objective is reached.

The core goal of the Cork transport and mobility forum is enabling people to travel in a way that is more sustainable and has less of a negative impact on their health and quality of life. This is to a large degree dependent on enabling people to switch from private motor vehicles to public and active transport. But it is also so about ensuring that people do not have to travel excessive distances to meet their everyday needs. Improving mobility is not about increasing the number of kilometres people can travel easily rather it is about minimising the number of kilometres you need to travel to make all the journeys you desire. By bringing trip generators closer together and improving permeability people can make more trips per day living more fulfilling and productive lives at the same time as spending less time and resources on travel.

The key determinant of this vision of improved mobility, which is well supported throughout this draft plan, comes to pass is not any dedicated transport intervention but rather ensuring homes and services are built closer together. This requires ensuring that commercial developments which have a high density of customers or employees visiting the site are located in mixed-use communities not in low density or purely commercial zones together with light industry or distribution hubs which have an inherently low density of employment and trip generation but rather in compact mixed-use communities together with homes services and amenities.

The proposed light industrial zones are highly appropriate for light industry, distribution and other commercial uses which have a low density of trip generation or hazardous noxious or are otherwise unsuitable for locating together with residential, service and amenity developments or where the majority of trips generated require the use of heavier vehicles such as HGVs, light trucks or vans.

An exception to this is large campuses which are of a scale too large to be accommodated within mixed-use developments these should be by located within the city centre or Docklands if they are of sufficient density and a suitable site can be identified otherwise they should be subject to a separate more stringent Mobility Management Plan than that outlined in objective 7.8 and located on a key public transport route preferably a rail line or the route of the proposed light rail scheme.

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The following objectives need modified to reflect this

Objective 7.10

New Strategic

Employment Sites

Existing text

Objective 7.10

New Strategic

Employment Sites

To support the sustainable delivery of high quality employment facilities taking into account other Development Plan objectives relating to zoning, transport and movement, urban design and placemaking, climate action, environmental management and sustainability, biodiversity, protecting cultural and built heritage and taking into account site specific objectives below:

- a. Blarney Business Park Extension: To provide for a high-quality extension to Blarney Business Park using the existing access to the Park. Any proposed development needs to safeguard the M/N20 (navy) route option which traverses part of the land until such time as a preferred route is chosen and the requirement lapses if the navy route is not identified as the preferred route.
- b. Clogheen Business Park Extension: To provide for a high-quality extension to the business park where care is needed to preserve the residential amenity of nearby residential properties.
- c. Land at Ballyvolane: To provide for a high-quality employment scheme that integrates with wider development, specifically the Ballyvolane expansion area to the south.
- d. Land at Glanmire: To provide for a high quality employment development that will primarily service logistics or logistics related uses. No more than 30% of the zoned land shall be developed for non logistics related employment uses.
- e. Land at South Link Industrial Estate: To provide for a natural extension to the existing industrial estate where, owing to the proposed intensification of use, an alternative access strategy through the industrial estate should be prioritised.
- f. Land at Fairhill: To provide for a high quality light industrial development scheme that is accessed from Upper Fairhill and suitably responds to the site topography, the site's frontage onto Nash's Boreen and the need to protect residential amenity of nearby residential priorities.
- g. Land at Hollyhill: To provide for a high quality business and technology scheme capable of accommodating expansion and other strategic investment in a manner that seeks to protect the surrounding landscape setting.

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Suggested Strengthening

Objective 7.10

New Strategic Employment Sites

To support the sustainable delivery of high-quality employment facilities for light industry, distribution and other commercial uses which have a low density of trip generation or hazardous noxious or are otherwise unsuitable for locating together with residential, service and amenity developments or where the majority of trips generated require the use of heavier vehicles such as HGVs, light trucks or vans. There will be presumption against development of general office space, call centres, retail and other high density commercial uses which can be accommodated in mix use communities. Taking into account other Development Plan objectives relating to zoning, transport and movement, urban design and placemaking, climate action, environmental management and sustainability, biodiversity, protecting cultural and built heritage and taking into account site specific objectives below:

- a. Blarney Business Park Extension: To provide for a high-quality extension to Blarney Business Park using the existing access to the Park. Any proposed development needs to safeguard the M/N20 (navy) route option which traverses part of the land until such time as a preferred route is chosen and the requirement lapses if the navy route is not identified as the preferred route.
- b. Clogheen Business Park Extension: To provide for a high-quality extension to the business park where care is needed to preserve the residential amenity of nearby residential properties.
- c. Land at Ballyvolane: To provide for a high-quality employment scheme that integrates with wider development, specifically the Ballyvolane expansion area to the south.
- d. Land at Glanmire: To provide for a high quality employment development that will primarily service logistics or logistics related uses. No more than 30% of the zoned land shall be developed for non logistics related employment uses.
- e. Land at South Link Industrial Estate: To provide for a natural extension to the existing industrial estate where, owing to the proposed intensification of use, an alternative access strategy through the industrial estate should be prioritised.
- f. Land at Fairhill: To provide for a high quality light industrial development scheme that is accessed from Upper Fairhill and suitably responds to the site topography, the site's frontage onto Nash's Boreen and the need to protect residential amenity of nearby residential priorities.
- g. Land at Hollyhill: To provide for a high quality business and technology scheme capable of accommodating expansion and other strategic investment in a manner that seeks to protect the surrounding landscape setting.

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Objective 7.13

Suburban General Offices

Existing text

Objective 7.13

Suburban General Offices

a. General offices units over 1,000 sqm will be open for consideration in suburban Business and Technology Zones, with due consideration given to the employment strategy, availability of alternative suitable sites in the City Centre and adjoining mixed use areas in Docklands, and assessment of the potential impact of the development on the City Centre. Availability of high-quality public transport will also be a factor in determining the capacity of these locations to take more intensive office development.

b. General offices will be open for consideration in District Centres provided each office unit is in excess of 1,000 sqm and the total area of offices is appropriate to the scale of the individual centre, subject to a general maximum of 20,000 sqm of offices in any one centre.

Suggested Strengthening

Objective 7.13

Suburban General Offices

a. General offices units **over 10,000 sqm** will be open for consideration in suburban Business and Technology Zones, with due consideration given to the employment strategy, availability of alternative suitable sites in the City Centre and adjoining mixed use areas in Docklands, and assessment of the potential impact of the development on the City Centre. **Such developments will be required to demonstrate in their mobility management plan how employees will be able to travel by public or active transport must not prove free or subsidised employee parking. Availability of high-quality and capacity public and active transport links will also be a factor in determining the capacity of these locations to take more intensive office development.**

b. General offices will be open for consideration in District Centres provided each office unit is in excess of 1,000 sqm and the total area of offices is appropriate to the scale of the individual centre, subject to a general maximum of 20,000 sqm of offices in any one centre.

Chapter 8

Heritage, Arts & Culture

We Strongly support the objective 8.29 unchanged as it is in the current draft

Objective 8.29

Separate Access to the

Upper Floors of Buildings

In order to ensure the continued use of upper floors above ground floor commercial uses, there will be a presumption against the loss of access to the upper floors of buildings from street frontages, Cork City Council will seek the reinstatement of upper floor access points wherever possible from the street.

Chapter 9

Environmental Infrastructure

Main points

- We support the objectives relating to the reduction of light, air & noise pollution and suggest their strengthening

We Strongly support the objective 9.18 unchanged as it is in the current draft

We support the following objectives and suggest the following modification/additions to strengthen their effectiveness in achieving the Strategic objectives laid out at the beginning of Chapter 2

Objective 9.17

Air Quality

Existing text

Objective 9.17

Air Quality

a. To protect and improve air quality in Cork City in accordance with the provisions of EU Directives and national legislation on air pollution and support the actions of the City Council's Air Quality Strategy 2021 2026, when it is finalised and its successors.

b. To continue to monitor air quality results submitted from selected locations throughout the City in co-operation with the Environmental Protection Agency and support the creation of a regional air quality and greenhouse gas emissions inventory.

Suggested Strengthening

Objective 9.17

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Air Quality

- a. To protect and improve air quality in Cork City in accordance with the provisions of EU Directives and national legislation on air pollution and support the actions of the City Council's Air Quality Strategy 2021 2026, when it is finalised and its successors.
- b. To continue to monitor air quality results submitted from selected locations throughout the City in co-operation with the Environmental Protection Agency and support the creation of a regional air quality and greenhouse gas emissions inventory.
- c. There will a presumption against the granting of planning to any development which may result in breaching of air quality limits. Where existing traffic level result of breaches, traffic reduction, limits and exclusions shall be used to reduce the level of pollution blow EU limits.

Objective 9.19

Noise

Existing text

Objective 9.19

Noise

To support the implementation of the objectives of The Cork Agglomeration Noise Action Plan 2018 – 2023 and promote the pro-active management of noise where it is likely to have significant adverse impacts on health and quality of life.

Suggested Strengthening

Objective 9.19

Noise

To support the implementation of the objectives of The Cork Agglomeration Noise Action Plan 2018 – 2023 and promote the pro-active management of noise where it is likely to have significant adverse impacts on health and quality of life. Where existing traffic level result in excessive noise levels in residential areas, particularly at night, speed limits, traffic reduction, traffic limitations and exclusions shall be used to reduce the level of noise pollution.

Chapter 10

Key Growth Areas & Neighbourhood Development Sites

Main points

- We find the Tivoli area development plan to be of the highest quality, vision and detail. It is suitable as a model of best practice
- We particularly want to praise the mobility hub concept which seeks to decouple parking from individual residential units and we feel this is a model which should be applied throughout Cork City
- The floor area ratio and dwelling units/ha figures for the City docks are far too low for the indicated building heights as it yields an anomalously low site coverage [figure and therefore should raised to a more appropriate level](#)
- We support the clear streets hierarchy and use of pedestrian/cycle streets in the City docks but [oppose the routeing of through motor traffic over the new bridge and along Monahan Rd.](#)
- We support the vision for mobility hubs in the city docks but feel that the proposed provision of 300 car parking spaces at each is an order of magnitude too many spaces and [parking should be limited to circa 30 car sharing space at each mobility hub and drop-off loading zones in the rest of the city docks.](#)
- The proposed total parking maximum in the city docklands is an order of magnitude to large at 10,280 it greater then the proposed total number of dwellings, [this needs to be radically reduced.](#)
- [Cork airport business park is not a suitable location for office developments](#) as it is in an isolated location which relies on a single congested public transport link and is inaccessible by walking or cycling

Overview

If time and resources were not an issue we would have liked to have given as much time and gone into as much detail on the city centre, City docks and Tivoli area plans as we have for each other chapter in this plan. We would have also like to have had written a substantial submission on each of the other area plans in this chapter.

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However, as our time and resources are finite, we have only been able to produce the most cursory and incomplete submission on the detail of this chapter and hope to comment more fully on the area plans in due course.

Section 2. City Docks

Overview

The general vision and intent of the plan, such as the clear streets hierarchy and use of pedestrian/cycle streets is to be commended and has our support as it is in line with the commitments 2 compact growth and a 15-minute City. However, there are a number of details which are in conflict with these objectives. Including that the total number of Dwellings proposed is far below what can be achieved on the site at the intensity of development which is outlined in the plan, the amount of car parking to be provided vastly exceeds the requirements of the site even assuming no reduction in-car use by residents or workers in the new development compared to the present city centre situation and the routing of arterial motor traffic through the site is of concern.

We Strongly support the following objectives unchanged as they are in the current draft

Objective 10.17

Objective 10.18

Objective 10.19

Objective 10.20

Objective 10.23

Objective 10.24

Objective 10.25

Objective 10.27

Objective 10.28

Objective 10.29

Objective 10.30

Objective 10.32

Objective 10.33

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Objective 10.34

Objective 10.35

Objective 10.36

Objective 10.37

Objective 10.26

We support the following objectives and suggest the following modification/additions to strengthen their effectiveness in achieving the Strategic objectives laid out at the beginning of Chapter 2

Objective 10.26

Specific Land Use Objectives

Existing text

Objective 10.26

Specific Land Use Objectives

It is an objective of Cork City Council to ensure that:

- The western neighbourhood / local centre is centred upon the western City Docks LRT stop.
- Live ground floor uses are provided in appropriate locations and restricted in all other areas to ensure a good quality of residential amenity in the new residential neighbourhood.

Suggested Strengthening

Objective 10.26

Specific Land Use Objectives

It is an objective of Cork City Council to ensure that:

- The western neighbourhood / local centre is centred upon the western City Docks LRT stop.
- Live ground floor uses are encouraged with appropriate uses confined to appropriate locations and restricted to 9 to 9 uses in all other areas to ensure a good quality of residential amenity in the new residential neighbourhood.

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Objective 10.31

Draft Cork City Docks Area-Based Transport Assessment (ABTA)

Existing text

Objective 10.31

Draft Cork City Docks Area-Based Transport Assessment (ABTA)

To implement the Draft Cork City Docks ABTA and its key recommendations, including:

- Achieving a 75:25 modal split in favour of sustainable transport modes.
- The delivery of the City Docks Transport Network and a clear street hierarchy that confines vehicular access to the City Docks within traffic cells in order to optimise the placemaking and public realm potential of the City Docks.
- High quality walking / cycling streets and strategic routes along the quays, including improvements to the pedestrian / cycle realm at Albert Quay / Eamon de Valera Bridge (as illustrated in Volume 2: Mapped Objectives).
- Transit orientated development, including the phased delivery of improvements to public transport from bus services, high quality bus services and the LRT.
- City Docks Bridge delivery.
- The provision of new pedestrian / cycle streets between Monahan's Road and Blackrock Road.
- Demand Management measures including maximum car parking standards.
- Preparation of a Mobility Hub Feasibility Study during the lifetime of this Plan.

Suggested Strengthening

Objective 10.31

Draft Cork City Docks Area-Based Transport Assessment (ABTA)

To implement the Draft Cork City Docks ABTA and its key recommendations, including:

- Achieving a 90:10 or greater modal split in favour of sustainable transport modes.
- The delivery of the City Docks Transport Network and a clear street hierarchy that confines vehicular access to the City Docks within traffic cells in order to optimise the placemaking and public realm potential of the City Docks.
- High quality walking / cycling streets and strategic routes along the quays, including improvements to the pedestrian / cycle realm at Albert Quay / Eamon de Valera Bridge (as illustrated in Volume 2: Mapped Objectives).

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- Transit orientated development, including the phased delivery of improvements to public transport from bus services, high quality bus services and the LRT.
- City Docks Bridge delivery as a dedicated active and public transport link.
- The provision of new pedestrian / cycle streets between Monahan's Road and Blackrock Road.
- Demand Management measures including maximum car parking standards.
- Preparation of a Mobility Hub Feasibility Study during the lifetime of this Plan.

We believe that the following objectives need modification to avoid conflict with the Strategic objectives laid out at the beginning of Chapter 2 and we cannot support without the following modifications.

Possible serious conflict between the figures in tables 10.3 and 10.4 the vision outlined in the other objectives and the figures in objective 10.32

We support the indicative height laid out in tables 10.3 and table 10.4, we strongly support the maximum heights in conjunction with the separate provision for tall builds, while we would be open to increasing the minimum guidance to 5 stories in all areas.

Given these indicative Heights and the commitment in objective 10.32 to a 15% minimum public open space/public realm space the floor area ratios in 10.3 to do not appear correct. Combining the indicative Heights and the FAR figures from tables 10.3 and 10.4 suggests a site coverage percentage in the region of 33% an extremely low figure in an urban context usually associated to the use of significant space by parking.

An urban development this we would expect site area to be broken down into to public realm, access, car parking, technical/logistical spaces and the area covered by buildings. Given that access in the majority of cases is from pedestrian/cycle streets and we are assuming that no surface parking is allowed in this area that yields an almost 85% site coverage available for buildings plus technical/logistical spaces.

The difference between this 85% figure and the 33% in figure implied from the FAR figures in table 10.3 is over 50% of the total site area! This is far too large an area to be accounted for by access or logistic/technical space. Is this space to be dedicated to car parking or are the figures in error?

We would strongly suggest that the floor area ratios be modified to reflect indicative site coverage percentages of circa 70-75% building coverage and circa 25% public open space/public realm/access space with no less than 15% public open space and no more than 5% of site area allowed for technical logistics or parking use. Any reduction in built site coverage should be used as extra public open space.

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Tables 10.3 & 10.4 combined (as in draft) plus site indicative coverage & Floor area calculated from the height & density targets	Indicative Floorspace Capacity	Indicative plot ratio - Floor Area Ratio (FAR)	Residential Floorspace %	Non- Residential Floorspace %	General Building height			Area ha	Residential Floorspace m2	Site coverage % (FAR/no. of storeys)			Dwellings Per Hectare	Residential Floorspace m2/unit	Units
					Target	min	max			Target	min	max			
Lower Glanmire Quarter	50,000	2	90	10	6	4	8	2.50	45000	33%	25%	50%	200	90	500
Warehouse Quarter	75,000	2.25	30	70	7	6	10	3.33	22500	32%	23%	38%			
Ford-Dunlop Quarter	210,000	2.25	30	70	7	6	10	9.33	63000	32%	23%	38%			
Wharf Quarter	175,000	2.25	85	15	7	6	10	7.78	148750	32%	23%	38%	250	76.5	1944
Marina Walk	90,000	2.5	90	10	7	6	10	3.60	81000	36%	25%	42%	250	90	900
Monahan's Quay	165,000	2	90	10	5.5	4	8	8.25	148500	36%	25%	50%	175	102.857143	1444
Canal Walk	160,000	2	80	20	5.5	4	8	8.00	128000	36%	25%	50%	175	91.4285714	1400
Polder Quarter	160,000	2.25	95	5	6	4	10	7.11	152000	38%	23%	56%	200	106.875	1422
City Docks	1,085,000	2.25	65	35	7	5	10	48.22	705250	32%	23%	45%	225	65	10850

Tables 10.3 & 10.4 combined (with suggested changes in red) plus site indicative coverage & Floor area calculated from the height & density targets	Indicative Floorspace Capacity	Indicative plot ratio - Floor Area Ratio (FAR)	Residential Floorspace %	Non- Residential Floorspace %	General Building height			Area ha	Residential Floorspace m2	Site coverage % (FAR/no. of storeys)			Dwellings Per Hectare	Residential Floorspace m2/unit	Units
					Target	min	max			Target	min	max			
Lower Glanmire Quarter	50,000	4	90	10	6	5	8	1.25	45000	67%	50%	80%	200	180	250
Warehouse Quarter	75,000	5	30	70	7	6	10	1.50	22500	71%	50%	83%			
Ford-Dunlop Quarter	210,000	5	30	70	7	6	10	4.20	63000	71%	50%	83%			
Wharf Quarter	175,000	5	85	15	7	6	10	3.50	148750	71%	50%	83%	250	170	875
Marina Walk	90,000	5	90	10	7	6	10	1.80	81000	71%	50%	83%	250	180	450
Monahan's Quay	165,000	4	90	10	5.5	5	8	4.13	148500	73%	50%	80%	175	205.714286	722
Canal Walk	160,000	4	80	20	5.5	5	8	4.00	128000	73%	50%	80%	175	182.857143	700
Polder Quarter	160,000	4	95	5	6	5	10	4.00	152000	67%	40%	80%	200	190	800
City Docks	1,085,000	4	65	35	7	5	10	27.13	705250	57%	40%	80%	225	115.555556	6103

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Mobility hubs

We strongly support the provision of the proposed mobility hubs in the area plan.

However, we are extremely concerned at the proposal that the mobility hubs consist of circa 300 parking spaces. A mobility Hub should be multimodal, allowing access to public transport and micro mobility such as the public bike scheme, parcel pick up and drop off as well as an interchange with motorised transport such as van to cargo bike for last mile delivery in more suburban locations the provision of a limited number of private car parking spaces in such mobility hubs is appropriate.

Given the central City location of the city docks we would propose that any car parking provided should be wholly or at least majority car share rather than private car parking spaces.

The provision of 300 car parking spaces at a single hub is grossly disproportionate and would transform the mobility hub into a park and ride at best and simple a car park at worst while the other features are eclipsed and overshadowed rather than a multimodal mobility hub. The number of car parking spaces in each mobility hub should be limited to no more than 25/30. Ideally the space dedicated to car parking including access for the car parking spaces should not exceed 50% of the area of the mobility hub.

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Chapter 11

Placemaking and Managing Development

Main points

- We support Sustainable Residential Development Objectives which are well thought out comprehensive except a reference to permeability needs added.
- Building Height Standards is very well thought out and executed except we think that historic buildings should be given more weight in determining the character of the city centre rather than simply the mean height of all buildings.
- Density Building Height Standards are a welcome improvement but still fall short of being able to achieve critical population density needed to ensure the viability of local services and therefore end car dependency.
- Maximum Car Parking Standards are slightly higher than we would ideally like in some cases but generally represent real progress. We feel that measures to decouple parking from development (as in Tivoli ch 10) and limit free parking are as if not more important than further reductions in the parking minimums

We Strongly support the following objectives unchanged as they are in the current draft

Objective 11.1 (a)

Objective 11.1 (b)

Objective 11.1 (c)

Objective 11.1 (d)

Objective 11.1 (e)

Objective 11.1 (g)

Objective 11.1 (h).

Objective 11.1 (i).

Objective 11.1 (j).

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Objective 11.1 (k).

Objective 11.2

Objective 11.3

Objective 11.4

Objective 11.5

Objective 11.6

Objective 11.7

Objective 11.8

Objective 11.13

We support the following objectives and suggest the following modification/additions to strengthen their effectiveness in achieving the Strategic objectives laid out at the beginning of Chapter 2

Objective 11.1 (f)

Sustainable Residential Development (access & permeability)

Objective 11.1 is in our opinion one of the most important objectives in the entire draft plan in particular parts (a), (b) and (h) are as important if not more important than any transport infrastructure in reducing the negative impact of Transport needs on health, the environment and quality of life of the inhabitants of cork by reducing average journey times and distances and allowing a modal shift to walking and cycling as well as making public transport more efficient. This is in short the central goal of the cork TMF to enable a shift to a more healthy, sustainable and efficient transport system.

We feel that in the measures outlined in objective 11.1 comprehensively and more than adequately address the all issues which are required to reduce average journey distance and hence car dependency, with one exception permeability. This is tangentially addressed in objective 11.1 f dealing with access of residential developments but does not specifically reference permeability. This should be remedied as suggested below.

Existing text

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Objective 11.1 (f)

Sustainable Residential Development

Residential developments shall be sustainable and create high quality places which:

- (f) Are easy to access for all and to find one's way around.

Suggested Strengthening

Objective 11.1 (f)

Sustainable Residential Development

Residential developments shall be sustainable and create high quality places which:

- (f) Are easy to access for all, to find one's way around and achieve a high level of pedestrian and cyclist permeability.

Objective 11.9

One-Off Housing: Demonstrable Need to Reside on Landholding

Existing text

Objective 11.9

One-Off Housing: Demonstrable Need to Reside on Landholding

Applicants shall satisfy the Planning Authority that their proposal represents a demonstrable need to reside on the land by based on their social and / or economic links to a particular local rural area, and in this regard, must demonstrate that they comply with one of the following categories of housing need:

- a. Farmers, including their sons and daughters who wish to build a first home for their permanent occupation on the family farm.
- b. Persons taking over the ownership and running of a farm on a full-time basis, who wish to build a first home on the farm for their permanent occupation, where no existing dwelling is available for their own use. The proposed dwelling must be associated with the working and active management of the farm.
- c. Other persons working full-time in farming, forestry, inland waterway, or marine related occupations, for a period of over seven years, in the local rural area where they work and in which they propose to build a first home for their permanent occupation.

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d. Landowners including their sons and daughters who wish to build a first home for their permanent occupation on the landholding associated with their principal family residence for a minimum of seven years prior to the date of the planning application.

Suggested Strengthening

Objective 11.9

One-Off Housing: Demonstrable Need to Reside on Landholding

Applicants shall satisfy the Planning Authority that their proposal represents a demonstrable need to reside on the land by based on their social and / or economic links to a particular local rural area, and in this regard, must demonstrate that they comply with one of the following categories of housing need:

- a. Farmers, including their sons and daughters who wish to build a first home for their permanent occupation on the family farm.
- b. Persons taking over the ownership and running of a farm on a full-time basis, who wish to build a first home on the farm for their permanent occupation, where no existing dwelling is available for their own use. The proposed dwelling must be associated with the working and active management of the farm.
- c. Other persons working full-time in farming, forestry, inland waterway, or marine related occupations, for a period of over seven years, in the local rural area where they work and in which they propose to build a first home for their permanent occupation.
- d. Landowners including their sons and daughters who wish to build a first home for their permanent occupation on the landholding associated with their principal family residence for a minimum of seven years prior to the date of the planning application **and who will not commute for the purpose of work from the land holding further than walking distance on a regular basis.**

Comments on the tables setting out standards for development

TABLE 11.1 Cork City Building Height Standards

We would like to complement and endorse the methodology used to provide a rational and comprehensive framework for preferred build heights throughout the city. We also broadly support the objective clearly applied in Table 11.1 to balance respect for the existing character of the various communities in the city with the requirement in the NDP for compact growth and the acknowledgement the past developments took place at densities so low as to have a detrimental

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effect on communities leading to lack of service provision in communities, isolation, car dependency and anti-social behaviour.

We therefore broadly support the target heights in table 11.1 while suggesting some minor modifications.

We would suggest that the table specifically reference the use of loft/garret floors with dormer or gable end windows which are an important feature of the historic vernacular architectural heritage of the city centre (see images below) as well as a significant feature in newer suburbs. For urban settings the guidelines should refer to the number of stories in the façade and encourage one or more set back loft floors behind the parapet as typified by the historic terrace on Washington St. (see images below).

For suburban setting this offers an efficient and attractive way to increase FAR and density with challenging the suburban character of an area. We would suggest that 2/3 story developments in the out suburban area would be encouraged to use loft/dormer type design to effectively become 2.5/3.5 story with any significant increase in height.

We have some concern that in the historic city centre heritage and a distinctive Cork feel is an important part of the character of the centre. In this context we are concerned that partially demolished and late 20thC ad-hoc replacements of demolished historic buildings should not be given equal weight in determining the charter of the city. Specifically, we are concerned that the historic charter of the city centre is 4-6 stories when loft floors above the parapet are included as typified by Washington st, Georges Quay etc, (see images below), but the current character is assessed at 2-5 stories. Even the historic outer areas of the city which have become part of expanding city centre such as Dunbar St, Cove St and popes Quay the older buildings are generally 4 stories (see images below).

A good example of this is Washington St where the historic original terrace is 6 stories, ground floor, mezzanine, 3 tall main floors and a habitable loft behind the parapet is retained on the South side of the street while on the North side of the street 2 stories of the original 6 are retained as part of a partially demolished building. The retained south side of the street should be used to assess the character of the street not the partially demolished North side. Given this we strongly suggest that the current character of the city centre is better established by the intact historic buildings which define the character of the city rather than the current mean height. This should be reflected in table 11.1 by recognising the current character as 4-6 stories and raising the upper & lower guide to 7 and 5 respectively.

We would call for a lower limit of 3 stories on all urban and inner urban development and for virtually all new urban and suburban development to take place in such a context. We welcome that this is broadly supported in table 11.1 with 2 stories only recommended in the outer suburbs with exception of 7; North West, 10; Blarney & 11; Stone view which will continue to allow 2 story development, this is understandable if they are not considered truly inner suburban which is a reasonable conclusion. However we are concerned that large areas between Douglas and the city centre are considered outer suburban despite being within walking distance of the city centre, in our view all of this area inside the South Ring should be considered in the same category as 3 Ballintemple & Blackrock or 4 Douglas

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Washington Street Above

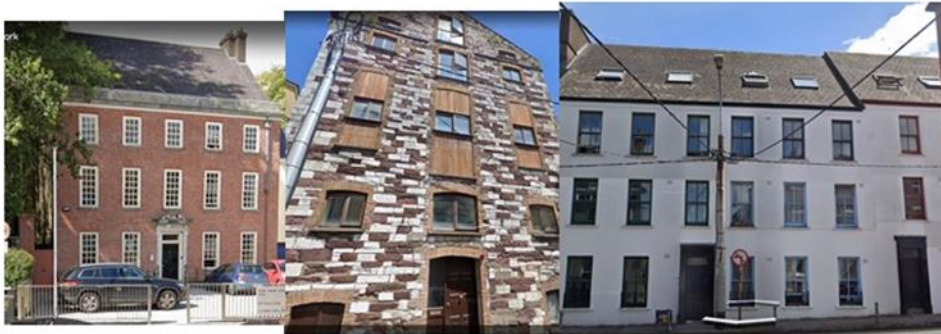
South side of the street 6/5+loft stories, historic buildings iconic of Cork and define the character of the area.

North side 2-story partially demolished remains of previous 6/5+loft story historic building should not be allowed to define the character of the area

George's Quay Below

Examples of historic urban vernacular cork architecture 4 full Facade floors + 1 or occasionally 2 to loft floors above . Historic character of the street 5/6 story





Cove Street, Dunbar Street and Popes Quay Above
Examples of 4 and 5 story historic character setting buildings even on
the historic urban edge/side streets

Oliver Plunkett Street below
Showing examples of a 5 story historic character defining building and
an anonymous partially demolished two-storey building



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11.50 Tall Building Zone

We support the tall buildings policy which is well thought out and appropriately balances the benefits and societal costs of tall building.

We support the 4 Tall building zones laid out in section 11.50, in our view [the City end of the Straight road/Carrigrohane Rd. is also a suitable location for tall buildings](#) given the existing character of the area, it's location of the probable route of light rail as outlined in CMATS and the lack of issues with over shadowing existing residents.

Table 11.2 Cork City Density Building Height Standards

One of the most welcome features and a central pillar of this draft plan is the commitment to achieve a 15-minute City where services and amenities needed to leave your everyday life if can be found within a 15-minute walk cycle or public transport ride. This is a vision we support in the strongest possible manner and the key reason we are so supportive in the draft as a whole. Much good work has obviously gone into ensuring that the commitment to compact growth and a 15 min city is reflected throughout this draft. And the consistently increased densities presented in table 11.2 a very welcome.

A 15 min city can only become a reality if a critical mass of people patronize the services within their local communities by walking or cycling to local services rather than driving to the city centre, district centres or out of town shopping centres. Services require a minimum level of population to support them within a community if the density and permeability of communities do not reach a critical level of services can only be supported if they are attracting people coming in from outside the community. This is not an issue in the city centre or district centres but for most Communities within the city local service will only survive if that critical level of population is living or working with a 10-15 walk. Even with the most optimistic levels of permeability services can only begin to be supported in a residential community when the density reaches 75-100 units per hectare. Even optimistic scenario requires a level of permeability that is not present in any existing community outside the city centre. It also requires that this high level of permeability and density is consistently maintained 10-15 mins walk in every direction. To realistically begin to achieve a 15-minute City even medium to large level developments must achieve densities significantly above this level in order to compensate for the existing lower densities of the existing community they are part of.

Outside of the city centre and Docklands the densities presented in table 11.2 simply will not deliver the critical mass of population within communities to support basic everyday services to allow the 15-Minute city to be reality. Any increase in density or permeability will reduce journey length and bring benefits but failing to attempt to reach a critical point is a missed opportunity.

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An examination of the figures in table 11.2 shows that there is ample scope to increase the floor area ratio and unit density without exceeding target story count laid out in table 11.1 or requiring a higher site coverage percentage than is reasonable given character of the areas involved and the requirement for access public spaces green space etc. With Minimum Site coverage percentage varying between 67% in the city centre and 5% in the outer suburbs and the lower limit for floor area per unit in all cases being above 100m², except in the case of the outer suburbs where the lower FAR limit of 0.2 will not provide sufficient floor area (57m²) for anything other than a 1 bed at even 35 units/ha

This is shown in the attached table 1

We would therefore suggest some slight increases in the floor area ratio in the city centre and outer suburbs as outlined below (the FAR figure for outer suburbs in table 11.2 seems unreasonably low as outlined above and so requires significant increase) and significant increase in the targeted number of units per hectare. With Minimum Site coverage percentage varying between 64% in the city centre and 13% in the outer suburbs and minimum floor area per unit in all cases being above 100m². The highest Minimum Site coverage percentage in any suburban area would be 25% which is well below the 30-40% required to maintain an open suburban character.

These suggested targets are shown in attached table 2 with any suggested changes in red.

Figure 11.4 Relationship between density and planning standards Source: Cork City Urban Density, Building Height and Tall Building Study.

Figure 11.4 is extremely useful and informative. However, it is slightly unclear if it is meant as an explanation as to the reasoning behind the other targets and objectives in this chapter or if it represents guidance for developers on appropriate features which are recommended at various densities?

We would support its use as guidance for developers on appropriate features which are recommended at various densities. If it is the case, we would suggest some slight changes to strengthen its support of other objectives in the draft plan.

Existing terraced houses housing in Cork City is built at densities well above 100 units per hectare and in some cases slightly exceeding 200 units per hectare. Examples include,

The area between Tower, Industry and Kevin's Sts, including Nessian and Bridgid Sts which consists of 49 large 3 /4 bed terraced houses on 0.3625Ha including the internal streets but excluding the surrounding streets or .4254ha including the surrounding streets and nearby parking giving between 115 and 135 units/ha

Horgan's buildings which consists of 118 small 1 /2 bed terraced houses on 0.5473Ha including the internal streets but excluding the surrounding streets or 0.691ha including the surrounding streets and nearby parking giving between 171 and 216 units/ha

The two terraces on Dalton's Av which consists of 24 terraced houses on 0.1016Ha including the internal streets but excluding the surrounding streets or 0.1194ha including the surrounding streets and nearby parking giving between 201 and 236 units/ha

(photos attached)

Given this fact we would suggest that terraced town houses are included as an option which is keeping with the existing character of Cork City and suitable densities of between 100 and 200 units per hectare.

We would suggest tightening the guidance in relation to parking provision as national climate goals and several objectives within this draft required suggest that driving should be discouraged, and that parking should be decoupled from residential units. Given this we would suggest removing on street parking as an option above 70 units/ha and dedicated communal podium or underground parking at above 100 units/ha. No parking/support car club should therefore be included in the guidance at lower densities, in our opinion it should be encouraged at all densities but should be presumed above 100 units/ha.

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Table 11.12: Workplace Travel Plan Thresholds.

We welcome and strongly support the requirement for workplace travel plans. We would support a further lowering of the threshold to 20 jobs for a travel plan statement and 60 jobs for a standard workplace travel plan where parking is built as part of the development. We would also be willing to support a relaxation of these standards where development did not include any parking or even where a development did not include any free parking for staff or customers.

Table 11.13: Maximum Car Parking Standards.

We strongly support and welcome the use of maximum car parking standards rather than the outdated practice of requiring parking minimums. The reduction of car parking provision has a vital role to play in discouraging car use, particular in central City areas. The reduction in parking provision also has an important role to play in lowering the cost of housing and other developments. The highest priority for the TMF would be to decouple of parking from other development. In particular the decoupling of parking from residential developments as including parking in the cost of housing drives up the cost of housing and makes development in the city centre less viable for everyone while benefiting only those drive.

Ideally as is suggested in the masterplan for Tivoli in chapter 10 the provision of parking should be totally decoupled from housing with any parking that is built as part of a housing development being required to be sold separately from the housing and for similar reasons commercial developments should not include free parking. Free parking in suburban areas provides an incentive to drive and hurts the established urban core. Where parking is allowed it should always come with a planning requirement preventing the provision of free parking for staff or customers, this plan should firmly establish the principal the parking should be paid for by those who use it rather than forcing those who don't to subsidise the costs for those who do.

We broadly welcome the standards in table 11.13 as a step in the right direction but we still fear that the level of parking permitted will inevitably become a stranded asset that is challenging to repurpose if present trends continue and if the national policy and the objective contained in this draft are successful this will happen far more quickly than most realise. And while our priority is to ensure the decoupling of parking and deployment through a prohibition on free parking and acknowledging the progress that has been made, we would still like to see some further reduction in these minimums in particular in relation to residential development and in the centre and close to public transport corridors.

We would suggest that city centre retail and commercial leisure as well as Theatres, Cinemas and Auditoriums have zero parking as this is already the normal situation in the city centre.

Table 11.14: Bicycle Parking Requirements.

We welcome the bicycle parking standards. We welcome the details specification of the location and nature of bicycle parking provision. The use of Sheffield stands rather than wheel grippers is to be highly commended we would prefer see residential standard for bicycle parking applying to all

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residential bed spaces rather than just apartments as while we are very supportive of terraced housing many of those living in terraced houses in the city have difficulty with bike parking.

We would like to an explicit reference to ensure that these standards apply to redevelopments as well as new build developments.

11.145 Residential Entrances/Parking in Front Gardens

We welcome the provisions of this section however we feel that in addition there should be a general presumption against allowing parking in front gardens and a general presumption that any planning application for change of use, extension, redevelopment etc where a front garden has previously been converted to parking should include the requirement to reinstate the front garden.