



## Transport & Mobility Forum

### **Cork City Council**

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

*Via online consultation portal*

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### **Public Consultation – Response**

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

<https://consult.corkcity.ie/en/consultation/variation-no-1-cork-city-development-plan-2022-2028>

Dear Sir/Madam,

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

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

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



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### General

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

We believe that there **should be no significant modification of the boundaries of existing Zones** that define the varying limits for parking provision.

While notice that there are minor proposed variations to the maximum parking limits for the individual Zones, it is the substantial re-definition of the Zones (1-4) sought (see proposed changes in table 4.6) that would allow a significant increase of the allowed number of on-site car parking spaces in large parts of the City.

### Rational for Parking Maxima

In our submission on the Draft City Development Plan (CDP 2022-2028) last year, we stated "we strongly object to the measures which increase the maximum parking provisions for new developments, as this is contrary to ensuring a liveable, walkable, sustainable City and the concepts of a 15-minute city/compact growth". We were pleased that the plan as adopted earlier this year contains ambitious standards and we are quite concerned that these standards are now sought to be revised, only months after they were initially adopted.

While the existing limits (CDP 2022) are quite ambitious and send the right message, these standards are now sought to be substantially softened, and basically drawn back to the standards of the 2014 and 2015 City/County Development Plans. The reasons given for the proposed variation sound like admitting that substantial improvements to alternative modes, i.e. provision of improved cycling and walking infrastructure and improved public transport, are lagging behind in delivery.

In our view, softening the standards for car parking, as a result, sends the wrong message and is detrimental to health, liveability, and competitiveness as well as to Cork City's ambitions to become a carbon-neutral city by 2030. Referring back to standards from 2014/15 must appear like a loss of 7 years in the city's ambitions to move towards a more sustainable transport system.

The presently existing upper limits for on-site parking for new developments would contribute to this goal as follows:

- Strict limits on the allowed provision of car spaces will reduce the number of developments that are planned around a car-centred transport behaviour.
- This will promote developments that are centred around the provision of alternative transport modes.



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- This will lead to higher demand for alternative modes of travel and increase the uptake of esp. cycling and public transport and support e.g. public transport by a higher number of passengers.
- The reduced number of cars that will be catered for regarding on-site parking will avoid adding more cars to an already saturated (peri)urban road network, while a reduction of car traffic load will support the reliability and attractiveness of public transport, walking and cycling.

Including parking provisions in urban developments increases their cost and decreases the density of such developments. This has a three-pronged effect in reducing the viability of compact walkable places, communities, and developments. By reducing the availability of housing, offices etc., increasing the cost of development and hence of living, operating a business, etc. in such places, and by reducing the density, it moves trip generators further apart making walking and cycling less viable and public transport less efficient.

All the above is **subject of the overarching goals** in all recent national, regional, and local transport, special planning and climate action policies and strategies, and these should be supported by the existing car parking limitations for new developments, as laid down in the Cork City Development Plan 2022-2028 in its existing form.

We acknowledge that the slow delivery of improvements for sustainable travel might cause hardship for individual developments. We could imagine that where disproportionate hardship arises, there should be the option to address such individual cases on a case-by-case basis, for a limited time frame and linked to clearly defined criteria. The general loosening (de facto reversal) of ambitious and progressive car parking limitations for large parts of the city appears to be a 'carte blanche' to further allow excessive car parking provision and not to be the right approach.

### **Departure from rational and well-planned Zones**

The Zones (1-4) defining the various upper parking limits as contained in the existing CDP 2022 are rational, well thought out, and coherent, an example of good planning. While we may argue on some minor details of the borders between zones, we strongly support the retention of the existing zones as there is a clear hierarchy based on rational well-founded planning criteria.

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



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

Zone 3 as presently constituted is the distant suburban areas which, while served by public transport links to the city centre, do not generally have all everyday services within easy walking distance and the frequency and timing of public transport may sometimes make it difficult to rely purely on public transport for all of your transport needs. Here, while it is possible to live without a car, there are still challenges that leave many with a certain dependency on a car.

Zone 4 as presently constituted are areas that are not planned to have the population density which could support a sufficient level of local services or regular public transport and here, car dependency is expected to remain in the short and medium term.

This zoning approach is a coherent well-planned rational system of zoning. The Proposed Variation seeks to replace this rational, well thought out and planned system of zoning with a system that has no such apparent rationale. It e.g. places the centre of Ballincollig, where all services are easily reached on foot and is served by a frequent 24-hour bus service, in the same zone as an isolated rural farm. This is not rational, well thought out and cannot be justified as good planning. It also places several areas in close proximity to the city centre, such as areas of College Road which are very well served by public transport and in easy walking distance of all services and amenities, employment and accommodation, in Zone 3, suitable for areas of an outer suburban character which cannot be deemed as appropriate.

We would readily concede that the boundaries of existing Zones could be modified slightly for example to include some other areas bordering the city centre within Zone 1 or the outer periphery of Ballincollig in Zone 3 rather than Zone 2. However, the variation rather than any rational modification of a well-thought-out system of zoning, is a uniform contraction of urban zoning with rural and suburban zoning expanding well into the urban core of the city. This suburban development is contrary to good planning and the commitment to compact sustainable growth as well as being hostile to active travel and public transport as stated above.

### Conclusion:

The TMF feels that the **Proposed Variation of the City Development Plan does not serve Cork City's ambitions to become a carbon neutral city by 2030**. We think that – using the 'Carrot and Stick' metaphor – the sticks must be kept, and the delivery of carrots must have highest priority. Reducing the sticks to enable further delay in the delivery of carrots would send the wrong message to the ever more needed speed up of a **sustainable transformation of our lifestyles and everyday behaviour around transport**. We want to take the Lord Mayor, Cllr Deidre Forde, by the word as she only said this week (when opening an event on climate change resilience) that it is 'hard decisions we need to take now, but we will benefit from them in the future'.



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The Proposed Variation would open Pandora's Box to accept further delays in delivering agreed improvements for sustainable travel modes. The pressure must be kept high for the timely roll-out of improved active travel infrastructure and the BusConnects / Connecting Ireland programmes for Cork.

We would subsequently welcome if the City Development Plan 2022 and in particular the boundaries of existing Zones would remain unchanged and do not support the Proposed Variation in the presented form.

We would be obliged to further participate in the discourse and planning processes around the development of Cork City and its transport system as we feel that TMF can provide valuable input into the process. Please do not hesitate to contact us at any time at [tmfcork@gmail.com](mailto:tmfcork@gmail.com).

Kind regards

*Stephan Koch*

Transport and Mobility Forum – Acting Chair

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

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

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