



Transport & Mobility Forum

Cork City Council
Planning Policy Section
Strategic and Economic Development
Directorate
City Hall
Anglesea Street
Cork, T12 T997

Via online consultation portal

Transport and Mobility Forum, Cork
www.transportandmobilityforum.com
tmfcork@gmail.com

c/o Cork Environmental Forum
Bernadette Connolly
Mount Carmel, Kilcolman
Enniskeane, Co. Cork
P47 C578

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Public Consultation – Response

Draft General Contribution Scheme 2023-2029 & Draft Supplementary Development Contribution Scheme 2023-2029

[Public Consultation on Draft Development Contribution Scheme 2023-2029 | Cork City Council's Online Consultation Portal](#)

Dear Sir/Madam,

Thank you for giving the general public and stakeholders the opportunity to feed into the Draft General Contribution Scheme.

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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Overview

We support most aspects of the draft scheme; however, we feel given the significant proportion of development contributions spent on building & maintaining roads this should be better reflected in the development contribution scheme. Contributions should be rebalanced to reflect different costs imposed by developments that generate a greater or lesser level of motor traffic due to its level of car dependency as determined by its nature, location, layout, and parking provision.

Observations:

Greater costs imposed by the provision of public infrastructure serving high car-dependant versus low car-dependant developments

We note that table 1 on pg5 shows that 52.45% of infrastructure spending is class 1 on “Roads, transportation infrastructure and facilities”. While we recognise and appreciate the extremely welcome provision by the City Council of a larger number of pedestrian, cyclist, public transport, and public realm schemes, whose expenditure likely falls under this heading in recent years, it is still the case that the cost of providing infrastructure to allow a journey by a private motor vehicle is orders of magnitude greater than the infrastructure cost of providing for equivalent journeys made on foot or by bike and very significantly greater than the infrastructure provision required for equivalent journeys by public transport. For example, a residential development in the city centre without parking where the vast majority of residents habitually walk to their place of work, to shop, and to community and recreational facilities nearby is several orders of magnitude less taxing on infrastructure than a similar number of units or square meters of residential development in a car dependant suburb where the vast majority of residents will habitually drive to work and everywhere else they go. This difference in infrastructure cost imposed by development should better be reflected in the contribution to the cost of class one infrastructure.

At present developers claim building high-density residential development in the city centre is uneconomical but delivering low-density car dependant suburban or exurban developments in isolated locations is economic. This is true only because of the high level of public expenditure on the services required to service these low-density isolated developments, particularly road infrastructure, which is required not only to serve these locations directly but also to serve the traffic generated by the car-dependant lifestyle of those who live in such development. An equitable development contributions scheme should seek to remove this anomaly.

Encouraging a compact, healthy, and more liveable city.

We note that it is national and local policy as laid out in the National Planning Framework, RSES, and City Development Plan to favour compact growth, active travel, and a healthy city over car dependency, sprawl, and unhealthy developments.

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While the primary aim of development contributions is to ensure that new developments contribute to the cost of the public infrastructure required to service such development, thought should also be given to imposing a slightly lesser burden on development which is seen to be in the public good and necessary for the development of the city at the cost of imposing a slightly greater burden on development which is contrary to the public good and/or impedes the development and improvement of the city as a whole. For these reasons, we suggest that the burden of class 1 public infrastructure costs be to some extent removed from residential and commercial development which can be shown to decrease car dependency or the amount or volume of private car traffic, and that a greater portion of the burden of class 1 public infrastructure costs instead placed on those developments which can be determined to increase car dependency and the amount or volume of private car traffic.

Rationale for determining the transport infrastructure impact of developments.

The exact method and quanta of determining of how development contributions should be rebalanced to better reflect the increased burden of public infrastructure costs imposed by more car dependant vs car-free development should be made by planners. However, we would suggest a number of rational that could be used for modifying the development contributions to better reflect this.

These would be how car dependant vs accessible a development was based on the location, density, and nature of development and also the provision of parking within a development. Ideally, all parking would attract a significantly higher level of development contribution than other types of space. While this may easily be accomplished for indoor parking it appears at present outdoor parking may not attract development contributions if it is not under the current legislation to charge contributions for such unroofed parking it should be done if it is not possible other rationale should be used.

We would suggest the following rationale be incorporated into the scheme

1 Developments easily accessible by active travel and public transport as determined by location and density receive a very significant reduction in the development levy development

2 Developments at lower densities and in areas which are not easily accessible by active travel and public transport and therefore highly car dependant would have to pay an additional top-up Levy to cover the increased costs of providing the road infrastructure to provide for the increased traffic burden.

3 A number of bands of Levy are introduced and determined by the level of parking provided with a development. Development without parking would pay the lowest contribution, with those providing a relatively low level of parking having reduced contributions and those with a higher or excessive level of parking playing proportionately higher levels of contributions this could be referenced against the parking maximums in the area



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

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/>