

25<sup>th</sup> November 2022

OPR Ref: DP-053-22

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

## Re: Proposed Variation No. 1 of the Cork City Development Plan 2022-2028

A chara,

Thank you for your authority's work in preparing proposed variation No. 1 of the Cork City Development Plan 2022-2028 (the proposed Variation).

In accordance with the provisions of section 31AM of the *Planning and Development Act* 2000, as amended (the Act), the Office is obliged to evaluate and assess development plans and variations of development plans in the context of certain statutory parameters including:

- matters generally to be contained in a development plan (section 10) and, in particular, section 10(2)(n) in relation to climate change;
- consistency with the National Planning Framework (NPF) and the Southern Regional Assembly Regional Spatial and Economic Strategy (RSES);
- Ministerial guidelines issued under section 28;
- Ministerial policy directives issued under section 29; and
- such other legislative and policy matters as the Minister may communicate to the
   Office in writing.

In principle, the Office supports a variation to the Development Plan to incorporate revised maximum parking standards which will be important in terms of supporting more sustainable transport options. This is particularly important in terms of the implementation of the Cork Metropolitan Area Transport Strategy and the significant public investment in

under the National Development Plan. The Office does, however, have serious concerns regarding the excessive car parking standards for the city suburbs and Urban Towns identified for significant public transportation infrastructure upgrade which could undermine delivery of this infrastructure. Worryingly, in many cases the parking standards are relaxed from that of the adopted Plan, for example by including Blarney, Ballincollig and Glanmire in zone 4 (currently in zones 2 and 3).

Recommendations issued by the Office relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under section 28.

As such, the planning authority is required to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

Observations take the form of a request for further information, justification on a particular matter, or clarification regarding particular provisions of a plan or variation on issues that are required to ensure alignment with policy and legislative provisions. The planning authority is requested by the Office to action an observation.

A submission also can include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. The planning authority is requested by the Office to give full consideration to the advice contained in a submission.

## Consistency with national and regional policy

The Office notes and welcomes the introduction of maximum car parking standards, and its consistency with policy objectives in RSES (RPO 151 and RPO 152) which prioritises permeability for walking, cycling, public transport modes and using maximum car parking standards as a tool to restrict parking provision to achieve greater modal shift.

The Office welcomed the introduction of a zonal approach to parking in the recently adopted Cork City Development Plan 2022 – 2028. However the Office is concerned having regard to the actual standards proposed across the range of residential and non-residential uses, particularly for the settlements within proposed car parking zone 3 and zone 4, which include the Urban Towns and outer suburbs where very high levels of population and

housing growth are proposed. Notably urban towns in Car Parking Zone 4 are identified for significant public transportation infrastructure upgrade, including Ballincollig, Blarney and Glanmire, have the same parking standards for those areas in the City Hinterland and Upper Glanmire.

The high level of investment for public transport in Cork under the National Development Plan can only be justified on the basis of transit oriented development, including at Ballincollig in conjunction with the LRT and at Blarney in conjunction with suburban rail.

The Office considers that the proposed Variation would benefit from further amendments to Table 4.6 'Parking Zones' to achieve an integrated approach to land use transport planning, consistent with the requirements of the RSES, the Cork MASP and the Cork Metropolitan Area Transport Strategy (CMATS), to maximise the potential for funding and to achieve the National Strategic Outcome for Sustainable Mobility. An evidence-based review of the car parking zones, in consultation with the NTA and TII, would enhance the sustainable transport outcomes for the city.

Further the proposed revision to car parking zones is also inconsistent with NPO 13, which requires that standards for car parking are based on performance criteria to achieve target growth, and with the general provision of the NPF that there should be no car parking requirement for new development in or near the centres of the five cities, and a significantly reduced requirement in the inner suburbs of all five.

The setting of excessive parking standards will also undermine the implementation of sustainable settlement and transport strategies, as climate change mitigation, under section 10(2)(n) of the Act.

## Consistency with section 28 guidelines

The planning authority is also advised that *Sustainable Urban Housing: Design Standards* for *New Apartments' Guidelines (2020)* promote a significant reduction or elimination of the need for car parking in highly accessible locations.

#### **City Development Plan - Modal Share Targets**

The adopted Cork City Development Plan, 2022 – 2028, includes modal share targets for the plan period, which is an important tool to increase priorities for and focus action on the

delivery of active and sustainable modes in line with national targets for reducing GHG emissions for the transport sector in the *Climate Action Plan 2021*.

Furthermore, the modal share targets form part of a key strategic principle of the Plan which is 'sustainable and active travel'. The objective for 'sustainable and active travel' is to implement the Cork Metropolitan Area Transport Study (CMATS) and develop a transformed sustainable transport system with a significant shift toward walking, cycling and public transport and to enshrine this principle in all developments across the City.

There is a very significant risk, however, that the car parking standards introduced by the proposed Variation would undermine the Plan's capability to achieve these modal share targets which are an integral component of one the Plan's key strategic principles, 'sustainable and active travel'.

In summary, the Office is of the view that the proposed inclusion of city suburbs in zone 3 (currently zone 2) and the inclusion of Urban Towns identified for significant public transportation infrastructure upgrades in zone 4 (currently zone 2 and 3) should be revised having regard to the above considerations.

# **Recommendation 1 – Car Parking Zones**

Having regard to National Policy Objective 13, Regional Policy Objectives 151 and 152, modal share targets in the Cork City Development Plan 2022-2028, guidance on car parking in *Sustainable Urban Housing: Design Standards for New Apartments' Guidelines (2020)*, section 10(2)(n) of the *Planning and Development Act 2000*, as amended, the Cork MASP and the Cork Metropolitan Area Transport Strategy and the need promote sustainable settlement and transportation strategies, the planning authority is required to:

 review and amend the car parking zones in Table 4.6 'Parking Zones', in consultation with the NTA and TII, to ensure that appropriate maximum car parking standards are included for both residential and non-residential uses, in accordance with NPO13.

# Summary

The Office requests that your authority addresses the recommendation outlined above. As you are aware, the report of the chief executive of your authority prepared for the elected members under section 13 of the Act must summarise this recommendation and the manner in which they will be addressed.

At the end of the process, your authority is required to notify this Office within five working days of the decision of the planning authority in relation to the proposed Variation. Where your authority decides not to comply with the recommendations of the Office, or otherwise makes the plan in such a manner as to be inconsistent with the recommendations made by this Office, then the chief executive shall inform the Office and give reasons for this decision.

Please feel free to contact the staff of the Office in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through the undersigned or at plans@opr.ie.

Yours sincerely,

**Anne Marie O'Connor** 

Deputy Regulator and Director of Plans Evaluations