

Chief Executive's Report

22nd December 2022

Proposed Variation No. 1 (Revised Car Parking Standards on a City-wide basis) to the Cork City Development Plan 2022-2028

(under Section 13(4)(b) of the Planning and Development Acts 2000
(as amended))



Comhairle Cathrach Chorcaí
Cork City Council

A Ard Mhéara agus a Comhairleoirí

Introduction

Set out hereunder is the report under Section 13(4) (a) and (b) of the Planning and Development Act, 2000 (as amended) in relation to the public consultation on **Proposed Variation No. 1 (Revised Car Parking Standards on a City-wide basis) to the Cork City Development Plan 2022 - 2028.**

On 28th October 2022 Cork City Council published notice that it had prepared proposed Variation No. 1 to the Cork City Development Plan, pursuant to Section 13 of the Planning and Development Act, 2000 (as amended).

The purpose of the report is to inform the Elected Members of Cork City Council of the outcome of the public consultation and the Chief Executive's recommendations in response to issues raised. The report is submitted to Members for their consideration.

The proposed Variation will result in the following changes to the City Development Plan:

1. Amendments to Table 4.6 "Parking Zones", Table 11.13 "Maximum Car Parking Standards" and consequential text changes in Chapter 4 Transport and Mobility and Chapter 11 Placemaking and Managing Development in Volume 1.
2. Inclusion of a new map of the Parking Zones in Volume 2: Mapped Objectives.

This report is presented in six sections and provides the following:

- 1.0 Overview of the Public Consultation Process
- 2.0 Outcome of Public Consultation
- 3.0 Summary of Issues Raised
- 4.0 Categorisation and Summary of Issues Raised and the Chief Executive's Response and Recommendations
- 5.0 Next steps

Appendices

Appendix 1: List of Submissions and Summary of Issues Raised

Appendix 2: Updated Parking Zone Map

1.0 Overview of the Public Consultation Process

In accordance with Section 13 of the Planning and Development Act 2000 (as amended) the proposed Variation was placed on public display for a period of 4 weeks from 28th October 2022 to 25th November 2022.

During the public consultation period the proposed Variation, including a planning report and Screening reports and Determinations for Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA), were made available for inspection by the public and submissions were invited as follows:

- Notification of the preparation and display of Proposed Variation No. 1 to the Cork City Development Plan 2022-2028, including Planning reports and Screening Reports for SEA and AA, for the purpose of public consultation were placed in the Irish Examiner on 28th October 2022 together with information on the public consultation process and an invitation for submissions.
- The relevant prescribed bodies were notified of the proposed Variation and were invited to make submissions.
- Public information on the proposed Variation, Screening Reports for SEA and AA were made available at the Cork City Council public planning counter in City Hall, at branch libraries, on the City Council website: <http://corkcitydevelopmentplan.ie> and on the Cork City Council on line consultation portal <http://consult.corkcity.ie>.

2.0 Outcome of Public Consultation

A total of **43 submissions** were received during the consultation period. Listed in Appendix 1 are the submissions received including the name of the person or organization making the submission and its identification reference number.

The Proposed Variation was subject to Environmental screening. Screening reports and Determinations for Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) were undertaken and ruled out any risk of likely significant effects, and therefore concluded that the Draft Variation did not require Appropriate Assessment or Strategic Environmental Assessment.

A number of amendments are recommended as a result of the submissions and observations received. Should Members agree with some or all of these recommendations, further screening for Appropriate Assessment (AA) or for Strategic Environmental Assessment (SEA) will be undertaken as part of the Variation process.

3.0 Summary of Issues Raised

Many of the issues raised in the 43 submissions received are interrelated and therefore are categorised under separate thematic headings for the purpose of identifying, analysing and responding to the issues. For the purposes of this Chief Executive's Report, the submissions are grouped under four main themes and addressed together under **Section 4.0**:

- Theme 1 Support for the Variation
- Theme 2 Inconsistent with higher level Plans and Guidelines
- Theme 3 Contrary to Climate action targets
- Theme 4 Environmental screening obligations

Appendix 1 includes a full list of submissions and a summary of the issues raised.

4.0 Categorisation and Summary of Issues Raised and the Chief Executive's Response and Recommendations

This section sets out a summary of issues raised in submissions and the opinion of the Chief Executive in relation to the issues raised and recommendations. Section 13(4)(b) of the Act requires that this Report specifically provides a summary of the recommendations, submissions and observations made by the Office of the Planning Regulator (OPR) and Southern Regional Authority (SRA). These are addressed in **section 4.1** below, along with the submissions from the National Transport Authority (NTA) and Transport Infrastructure Ireland (TII). **Section 4.2** below summarises the other submissions received under the 4 themes identified in **section 3.0** above.

4.1 Summary of submissions from the Office of the Planning Regulator, Southern Regional Assembly, National Transport Authority and Transport Infrastructure Ireland

4.1.1 Office of the Planning Regulator (Submission 31)

The Office of the Planning Regulator (OPR) has a statutory role in evaluating and assessing development plans, draft development plans and variations to development plans, to ensure consistency with legislative and policy requirements relating to planning. The submission contains one recommendation:

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.*

The submission 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.

Concerns are raised regarding the excessive car parking standards for the city suburbs and Urban Towns (car parking Zone 3 and Zone 4) which are identified for significant public transportation infrastructure upgrade. The proposed approach could undermine delivery of this infrastructure. 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 OPR 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.

The submission also highlights that the proposed standards are inconsistent with the Sustainable Urban Housing: Design Standards for New Apartments' Guidelines (2020) which promote a significant reduction or elimination of the need for car parking in highly accessible locations.

The submission notes that the adopted Cork City Development Plan 2022-2028 includes modal share targets for the plan period, which is important in relation to climate action and reducing emissions and the implementation of the Cork Metropolitan Area Transport Study (CMATS), and that there is a significant risk that the car parking standards introduced by the proposed Variation would undermine the Plan's capability to achieve these targets.

The OPR considers 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.

Chief Executive's Response

Cork City Council welcomes the comments made by the OPR in its submission and the recommendation to consult with the NTA and TII with a view to reviewing and amending the car parking zones and maximum car parking standards. In response to the OPR's recommendation Cork City Council consulted with the NTA and TII with a view to identifying an approach in relation to car parking.

The Proposed Variation included proposed new text to reference that the car parking proposals set out in the Variation would apply for a period of 2 years, when they would be reviewed, and that they would be reviewed annually thereafter. This was to ensure that car parking provision reflected current levels of provision and the rollout of CMATS including the programme of works envisaged under Bus Connects Corks and longer-term plans to deliver an LRT service.

In order to address the matters raised in the OPR, NTA and TII submissions (see below for further detail on the NTA and TII submissions), and following consultation with the NTA and TII, a number of amendments to the Proposed Variation are recommended in order to align the short-term demand management of car parking more closely with the rollout of CMATS and its constituent programmes including BusConnects and delivery of the LRT system, having regard to existing public transport frequencies and the achievement of targets set out in the Climate Action Plan 2021.

It is recommended in this Chief Executive's Report to:

- Move all urban towns (including Blarney, Tower, Glanmire and Ballincollig – see also following bullet), lands between Ballincollig and the western Cork City suburbs, and the Cork Airport area from Zone 4 to Zone 3.
- Move the most public-transport accessible suburban areas (including Blackpool, Wilton, Ballincollig Town Centre and Douglas) from Zone 3 to Zone 2.
- Make associated modifications to the proposed "City Car Parking Zones" map reflecting the above.
- Reduce the maximum car parking standards for Zone 3 for:
 - Universities, colleges of further education
 - Community and recreational buildings
 - Commercial leisure (amusement centres, play centres, etc)
 - Café, restaurants and takeaways,
 - Public houses (including hotel bars)

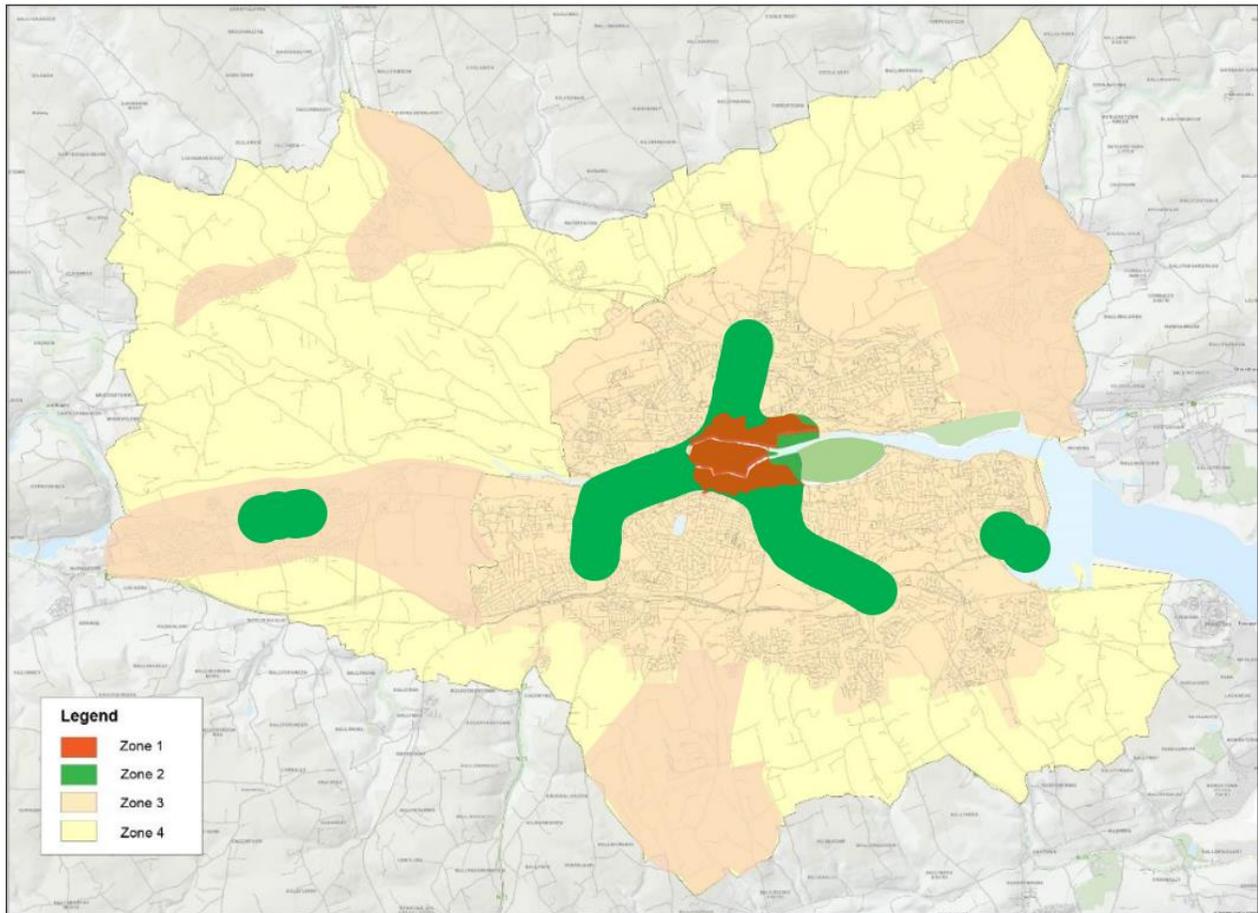
- Retail (including retail office and retail services)
- Retail warehouse
- Hospitals (in patient facilities, nursing homes)
- Industry, and
- Offices, enterprise and employment
- Reduce the maximum car parking standards for Zone 2 for:
 - Offices, enterprise and employment
- Reduce the review period from 2 years to 1 year following adoption of the variation.
- Include additional text in the variation (in the proposed new text following existing City Development Plan paragraph 11.238) confirming that in order to determine the most appropriate level of parking provision within the maximum standards specified, an accessibility rating for different locations in Cork City will be developed in consultation with the NTA based on established good practice. This approach will ensure the growing transport needs of the city are serviced by sustainable and active travel modes where such infrastructure is delivered as prescribed in CMATS and will assist deliver on the targets set out in the Climate Action Plan 2021.

The actual proposed modifications to the Proposed Amendment are reflected below. These proposed modifications are considered to respond directly to the OPR request to revise the spatial allocation of the car parking zones and to review the maximum car parking standards in consultation with the NTA and TII.

The inclusion of the urban towns in Zone 3 from Zone 4 and the inclusion of areas of the City suburbs which currently have good public transport frequencies such as Wilton, Douglas, Blackpool and Ballincollig Town Centre are proposed to move to Zone 2, in tandem with the revised maximum parking rates, will have a significant reduced impact in maximum car parking. For example, the proposed revised rate for “Offices, enterprise and employment” in Zone 3 to 1 space per 75m² equates to a car driver modal share of approximately 20%, significantly below (i.e. more favourable than) the CMATS target of 49%.

Chief Executive’s Recommendation

1. (a) Move all urban towns (including Blarney, Tower, Glanmire and Ballincollig (excluding Ballincollig Town Centre– see also following bullet), lands between Ballincollig and the western Cork City suburbs, and the Cork Airport area from Zone 4 to Zone 3.
- (b) Move the most public-transport accessible suburban areas (including Blackpool, Wilton, Ballincollig Town Centre and Douglas) from Zone 3 to Zone 2.
- (c) Make associated modifications to the proposed “City Car Parking Zones” map reflecting the above. Revised Map attached as **Appendix 2**, small version below.



2. Amend Table 11.13 as follows:

The following maximum car parking standards are affected

- Universities, colleges of further education
- Community and recreational buildings
- Commercial leisure (amusement centres, play centres, etc)
- Café, restaurants and takeaways,
- Public houses (including hotel bars)
- Retail (including retail office and retail services)
- Retail warehouse
- Hospitals (in patient facilities, nursing homes)
- Industry, and
- Offices, enterprise and employment

* note: The table as presented below is as proposed in Proposed Variation No 1 with the modifications recommended in this Chief Executive’s Report indicated ~~thus~~ and thus.

Table 11.13: Maximum Car Parking Standards				
Land Use Category	Zone 1	Zone 2	Zone 3	Zone 4
	City Centre & Inner City	Accessible to mass transit (existing/committed public transport).	City Suburbs	Urban Towns, Hinterland Villages and Hinterland
Maximum Standards: 1 space for each unit of gross floor area sq m unless otherwise indicated.				
RESIDENTIAL DEVELOPMENT				
Residential (1-2 Bed)	0.5	1	1.25	1.25
Residential (3-3+ bed Unit)	1.0	2.0	2.25	2.25
Docklands	These areas have different car parking standards. Please refer to Chapter 10.			
Tivoli				
Elderly Person Dwellings/ Warden Supervised Group Housing Schemes/ Sheltered Housing	0.25	0.5	0.5	0.5
Residential Institutional	None	1 per 20 Bed Spaces	1 per 10 Bed Spaces	1 per 10 Bed Spaces
Student Housing	None	1 per 20 Bed Spaces	1 per 10 Bed Spaces	n/a
EDUCATION				
Universities Colleges of Further Education	1 per Classroom and 1 per 30 students	1 per Classroom and 1 per 20 students	1 per Classroom + 1 per 5 10 students	1 per Classroom + 1 per 5 students
Schools	1 per 5 classrooms	1 per 2 classrooms	1 per classroom	1 per classroom
Creches	1 per 6 children	1 per 6 children	1 per 6 children	1 per 6 children
COMMUNITY				
Places of Worship	25 Seats	15 Seats	10 Seats	10 Seats
Community and Recreational Buildings	250	150	50 75	50
LEISURE: Pubs, Restaurants, Hotels and Conferencing				
Commercial Leisure (Amusement Centres, Play Centres etc)	200	150	50 75	50
Conference Centres: Public Areas	100	75	20 50	20

Table 11.13: Maximum Car Parking Standards				
Land Use Category	Zone 1	Zone 2	Zone 3	Zone 4
	City Centre & Inner City	Accessible to mass transit (existing/committed public transport).	City Suburbs	Urban Towns, Hinterland Villages and Hinterland
Hotels and Guest Houses (excluding public areas)	1 per 2 Rooms	1 per 2 Rooms	1 per Room	1 per Room + 1 space per staff on duty + public space as per bars and restaurants as set out in this table
Café, Restaurants and Takeaways	150nsm	100nsm	20 50 nsm	20nsm
Public Houses (including hotel bars)	300nsm	100nsm	25 50 nsm	25nsm
Theatres, Cinemas and Auditoriums	25 Seats	15 Seats	10 Seats	10 Seats
Other Cultural, Recreation and Leisure Uses	Dependent upon nature and location of use.			
RETAIL				
Convenience Retail	100	50	20	20
Retail (including Retail Office and Retail Services)	275	100	20 50	20
Retail Warehouse	200	100	30 50	30
Showrooms	200	150	50	50
HEALTH				
Hospitals (In patient facilities, Nursing Homes)	1 per 2 Patient beds	1 per 2 Patient beds	1 per 1 patient bed 1 per 2 patient beds	1 per patient bed
Hospitals (Outpatients)	100	80	40	40
Medical Clinics Primary Healthcare Centres	1 per Consulting Room	1 per Consulting Room	1 per Consulting Room	1 per Consulting Room
EMPLOYMENT: Including Offices, Industry Light and General				
Industry	200	140	80 100	50
Offices, Enterprise and Employment	200	150 100	50 75	50

Table 11.13: Maximum Car Parking Standards				
Land Use Category	Zone 1	Zone 2	Zone 3	Zone 4
	City Centre & Inner City	Accessible to mass transit (existing/committed public transport).	City Suburbs	Urban Towns, Hinterland Villages and Hinterland
Docklands	These areas have different car parking standards. Please refer to Chapter 10.			
Tivoli				
Warehouse	450	300	200	200

3. Include additional text in the Proposed Variation and associated text alterations:

* note:

- Text represented thus or ~~thus~~ is as per adopted Cork City Development Plan 2022-2028
- Text **represented thus** is from the (original) Proposed Variation No 1
- Text ~~represented thus~~ reflects text from the (original) Proposed Variation No 1 proposed to be omitted as recommended in this Chief Executive’s Report
- Text **represented thus** reflects proposed new text recommended in this Chief Executive’s Report

Chapter 4: Transport and Mobility - proposed amendments

4.103: Parking Management

The Plan includes comprehensive car parking standards which are set in Chapter 11 Placemaking and Managing Development. Four parking zones have been established for the City with the aim of ensuring adequate residential parking/ car storage and control of destination car parking (non-residential uses), whilst also allowing greater flexibility in car parking standards on sites well served by public transport. The four zones are detailed in Table 4.6 and are illustrated in Volume 2, Mapped Objectives.

4.105: Parking Management

These standards will be reviewed ~~periodically as the~~ **one year following the adoption of Variation No 1, and then as part of the 2-year Development Plan Progress Report and annually thereafter. Further updates will be informed as ongoing** measures and interventions prescribed in CMATS come on stream. **See [new text following paragraph 11.238] for further details.**

Table 4.6: Parking Zones – update as follows:

Car Parking Zones	Primary Areas
Zone 1	Cork City Centre and Inner City
Zone 2	Areas accessible to mass transit alongside public transportation corridors in the form of Suburban Rail, Light Rail Transit (LRT) or BusConnects Cork and encompasses most of the city suburbs, This zone includes areas within 500m of Blackpool/ Kilbarry Station and may be expanded in the future to reflect improved access to mass transit across the City. (existing, committed and indicated or proposed Light Rail Corridor, Core Bus Network). It includes areas within 500m of Blackpool/ Kilbarry Station. Most City Suburbs, including Ballincollig, Ballypheane, Ballyvolane, Bishopstown, Blackrock, Blackpool, Douglas Mahon, Mayfield, Sundays Well, Togher City Suburbs which have good public transport frequencies including Wilton, Mahon, Douglas, Blackpool and Ballincollig Town Centre.
Zone 3	Blarney, Glanmire, Rochestown, Tower Urban Towns of Ballincollig (excluding the Town Centre), Blarney, Glanmire, Tower, City Suburbs including Ballypheane, Ballyvolane, Bishopstown, Blackpool, Blackrock, Cork Science and Innovation Park, Curraheen, Douglas (incorporating Rochestown, Frankfield and Grange), Dublin Hill, Kilbarry, Knocknaheeny and Holyhill, Lota, Mahon, Mayfield, Sundays Well, Togher (incorporating Lehanaghmore and Doughcloyne), Wilton. Cork Airport and surrounding areas.
Zone 4	Urban Towns of Ballincollig, Blarney, Glanmire, Tower, City Hinterland, Kerry Pike, Killeens, Upper Glanmire.

Chapter 11: Placemaking and Managing Development - proposed amendments

Update text relating to Car Parking Zones as follows:

Zone 1

11.235

Parking Zone 1 generally comprises Cork City Centre and the Inner City, including South Parish, Shandon, Wellington Road and St. Lukes. This zone is currently accessible by public transport and is a walkable environment. It is policy to constrain parking within the City Centre below the maximum level of provision indicated in the table in order to reinforce pedestrian priority in the area and to promote a material shift to non-car transportation. Provision of additional commuter parking within this area will not generally be permitted. In exceptional cases a small amount of parking may be allowed on site (subject to mobility management plans and workplace travel plans) as an incentive to promote the renewal/ redevelopment of large strategic sites. This will only be feasible where the location and configuration of sites is such to allow parking without causing undue local congestion or negative impact on pedestrian movements.

Zone 2

11.236

Parking Zone 2 reflects areas that are or will be accessible to mass transit **alongside public transportation corridors** ~~in the form of Suburban Rail, Light Rail Transit (LRT) or BusConnects Cork and encompasses most of the city suburbs,~~ **This zone includes areas within 500m of Blackpool/ Kilbarry Station and may be expanded in the future to reflect improved access to mass transit across the City. The City Docks / Tivoli Docks have their own maximum car parking standards (see Chapter 10). This also includes City Suburbs which have good public transport frequencies including Wilton, Mahon (including the District Centre, Jacobs Island and nearby employment lands), Douglas, Blackpool and Ballincollig Town Centre.**

Zone 3

11.237

Parking Zone 3 covers the ~~Urban Towns of Blarney, Tower and Glanmire and the Outer Suburb of Rochestown~~ **the Urban Towns of Ballincollig (excluding the Town Centre), Blarney, Glanmire, Tower, Cork Airport and surrounding areas,** ~~City Suburbs including including Ballyphehane, Ballyvolane, Bishopstown, Blackpool, Blackrock, Cork Science and Innovation Park, Curraheen, Douglas (incorporating Rochestown, Frankfield and Grange), Dublin Hill, Kilbarry, Knocknaheeny and Holyhill, Lota, Mahon, Mayfield, Sundays Well, Togher (incorporating Lehanaghmore and Doughcloyne), Wilton.~~ **Bus Connects Cork is proposed to serve these areas of Cork City. It is envisaged that parking standards serving this zone will be reduced to reflect the level of public transport services over time. These areas have been identified for public transport improvements, the interventions currently being considered are not at a scale envisaged to allow for a more substantial reduction.**

Zone 4

11.238

Parking Zone 4 covers the ~~Urban Towns of Ballincollig, Blarney, Glanmire, Tower,~~ **City Hinterland and the Hinterland Villages of Kerry Pike, Killeens and Upper Glanmire.**

Include additional text after 11.238

These standards will be reviewed one year following the adoption of Variation No 1, and then as part of the 2-year Development Plan Progress Report and annually thereafter. Revisions will be informed by ongoing measures and interventions prescribed in CMATS as they come on stream. The application of maximum car parking standards will remain the standard going into the future. However, to determine the most appropriate level of parking provision within the maximum standards specified, an accessibility rating for different locations in Cork City will be developed in consultation with the National Transport Authority. This accessibility rating will be based on established good practice. The approach will ensure the growing transport needs of the city are serviced by sustainable and active travel modes where such infrastructure is delivered as prescribed

in CMATS. This alternative approach to the provision of parking in Cork City will assist delivery on the targets set out in the Climate Action Plan 2021.

In locations where there is existing and/ or planned high frequency public transport accessibility (as per CMATS and Bus Connects Cork) and where the receiving road/ street network currently experiences congestion, Cork City Council will ~~support~~ **require** a reduction in parking provision below the maximum standards as presented in Table 11.13. Applicants will be required to justify the level of parking through the preparation of a robust **assessments, including** traffic and transport impact assessment/ statement accounting for the receiving environment (including its local character), proposed transport infrastructure, the extent of parking in the general vicinity (including precedents for the application for reduced parking standards) and the potential impact on the local street/ road network.

The preparation of the **assessments including** traffic and transportation impact assessment/ statement will need to include the necessary surveys and transport modelling along with other additional Development Management requirements as set out in Chapter 11 Placemaking and Managing Development. Cork City Council advocates a coordinated approach to car parking standards across the Cork Metropolitan Area in order to prevent competition between centres in Metropolitan Cork based on parking availability and charges. Cork City Council is committed to the ongoing monitoring of the application of car parking standards across the City. ~~Further updates to the maximum car parking standards will be informed by an evidence base of modelling and ongoing CMATS interventions, as well as relevant best practice. Cork City Council will work in partnership with the National Transport Authority in the ongoing assessment and future revisions to the car parking management framework over the lifetime of the Plan.~~

4.1.2 Southern Regional Assembly (Submission 30)

Planning authorities have a statutory obligation to ensure that its development plan is consistent with the relevant regional spatial and economic strategy. The Southern Regional Assembly (SRA) has a statutory role in making submissions and observations on variations to development plans stating whether the proposed variation of the development plan and its core strategy are consistent with the regional spatial and economic strategy.

The submission notes that the proposed variation can strengthen its consistency with the following Regional Policy Objectives of the RSES: RPO 151 Integration of Land Use and Transport; RPO 152 Local Planning Objectives; RPO 160 Smart and Sustainable Mobility; RPO 163 Sustainable Mobility Targets; RPO 164 Metropolitan Area Transport Strategies; and RPO 176 10 Minute City and Town Concepts, and the following Cork MASP Policy Objectives: Cork MASP Policy Objective 7 Integrated Land Use and Transport Planning; and Cork MASP Policy Objective 8 Key Transport Objectives of the Cork Metropolitan Area Transport Strategy.

The SRA note that effective demand management measures which promote greater use of sustainable mobility are necessary to achieve the National Climate Action Plan and National Sustainable Mobility Policy targets for a 50% reduction in transport carbon emissions by the end of this decade, 500,000 additional daily active travel and public transport journeys and a 10% reduction in kilometres driven by fossil fuelled cars by 2030.

The SRA recommends that subject to a final assessment and alignment between the locations in Car Parking Zone Table 4.6 with new text in Chapter 11 supporting a reduction in parking provision in locations of existing and/or planned high frequency public transport accessibility, Proposed Variation No. 1 can be strengthened as an effective demand management measure that will support the implementation and viability of public transport and active travel infrastructure under the CMATS. The proposed variation is an opportunity to support a greater transition to sustainable mobility with multiple benefits to the health, quality place making and a low carbon future for Cork City Council. Through final strengthening of the demand management and integrated land use and transport planning measures in the application of parking zones, the proposed variation will show a greater consistency with objectives of the RSES and Cork MASP, especially for integrated land use and transport planning and implementation of supporting measures for delivering CMATS.

Chief Executive’s Response and Recommendation

The recommendations set out in the Chief Executive’s Response and Recommendations under **“4.1.1 Office of the Planning Regulator (Submission 31)”** is considered to address the concerns and issues raised in the SRA’s submission, as the proposed amendments to the Variation would strengthen the alignment and consistency of the City’s approach to car parking with the relevant RSES RPOs and Cork MASP Objectives.

4.1.3 National Transport Authority (Submission 43)

The NTA supports the monitoring of how parking standards are applied and welcome the opportunity to work with Cork City Council on matters relating to parking policy as an aspect of CMATS implementation, however as a demand management approach the NTA does not support the determination of car parking standards on the basis of current or short-term public transport outcomes, as this is not considered to sufficiently support the delivery of sustainable transport projects identified in CMATS. Consequently, the Proposed Variation is considered inconsistent with the National Planning Framework (NPO’s 13 and 54), National Sustainable Mobility Policy (Goal 9), the RSES for the Southern Region (Goal 2). The submission also considers the proposed Variation represents a risk to the achievement of the stringent targets set out in the Climate Action Plan 2021 as they relate to transport and notably the measures set out under section 15.3.2 (System Efficiency and Demand Management), including ‘reducing parking provision’.

Regarding the Parking Zones, the NTA is particularly concerned by the proposed redefinition of Zones 2, 3 and 4 which results in:

- the exclusion of both the City Suburbs and Ballincollig (Urban Town) from Zone 2 and their reclassification as Zones 3 and 4 respectively; and

- the exclusion of three Urban Towns (Blarney, Glanmire, Tower) and the City Suburb of Rochestown from Zone 3 and their reclassification as Zone 4.

The submission also refers to the in combination effects with the substantial relaxation of car parking standards applicable to Zone 2 and Zone 3 across a broad range of land uses including Residential, Student Housing, Schools, Community and Recreational Buildings, Commercial Leisure, Restaurants/Takeaways, Retail, Showrooms, Hospitals, Industry and Offices, which would result in a substantial relaxation in car parking standards in areas in which substantial improvements in public transport services are planned for and committed to in the short to medium term and in any case within the CMATS time frame up to 2040.

In relation to Zone 2, the NTA would not support the proposed changes to paragraph 11.236 which reduces its spatial extent and specific reference to CMATS projects (“Suburban Rail, LRT and BusConnects, and encompasses most of the city suburbs”) while asserting that “Parking Zone 2 reflects areas that are or will be accessible to mass transit alongside public transportation corridors”. Although the proposed changes do state that “This Zone ... may be expanded in the future to reflect improved access to mass transit across the City”, these two elements are currently not compatible, given the extent of the existing and proposed public transport networks and associated catchments.

The NTA advise that the proposed Variation should not be made and that additional work needs to be undertaken before any changes to the adopted Development Plan’s parking standards are considered, however the NTA would welcome an opportunity to meet to further discuss the issues raised.

Chief Executive’s Response and Recommendation

The recommendations set out in the Chief Executive’s Response and Recommendations under “4.1.1 Office of the Planning Regulator (Submission 31)” is considered to address the concerns and issues raised in the NTA’s submission. Cork City Council will work with the NTA to develop a methodology to determine the most appropriate level of parking based on an accessibility rating for different locations in Cork City to inform the 1-year review of the standards proposed in the Proposed Variation as modified by the recommendations set out in this Chief Executive’s Report. This accessibility rating will be based on established good practise and the approach will ensure the growing transport needs of Cork City are serviced by sustainable and active travel modes where such infrastructure is delivered as prescribed in CMATS.

4.1.4 Transport Infrastructure Ireland (Submission 6)

The submission highlights that Government policy no longer caters for unlimited road traffic growth and that it is critical for the protection of the safety, capacity and efficiency of national roads and also the promotion of sustainable development that appropriate transport demand management is undertaken in cities, towns and villages. Effective transport demand will assist in reducing private car dependency, facilitate modal shift and promote the use of public transport

(existing and proposed). The overprovision of car parking has the potential to undermine modal shift.

TII consider that the proposed framework for car-parking in as set out in the Proposed Variation does not meet the objectives of CMATS or Government policy in relation to the Urban Areas in Zones 3 and 4 which are, in a number of instances, proximate to the national roads network. TII advises that the car parking approach in these urban areas, which can be characterised as established urban area with significant existing education, hospital, commercial and retail offers, which are also currently the subject of considerable development pressure, is confusing and in the proposed format could create difficulties in the implementation through development management process as well as future public transport infrastructure.

TII is of the opinion that the approach in Zones 3 & 4 will encourage private car dependency and will potentially undermine active travel and public transport provision in the short – medium term thus creating an adverse impact on the national road network.

TII recommends the current variation proposal is paused to address these matters including consultation with the NTA and TII with regard to developing an appropriate car-parking regime for the city region.

Chief Executive’s Response and Recommendation

The recommendations set out in the Chief Executive’s Response and Recommendations under **“4.1.1 Office of the Planning Regulator (Submission 31)”** is considered to address the concerns and issues raised in TII’s submission. Cork City Council will work with the NTA and TII to develop a methodology to determine the most appropriate level of parking based on an accessibility rating for different locations in Cork City to inform the 1-year review of the standards proposed in the Proposed Variation as modified by the recommendations set out in this Chief Executive’s Report. This accessibility rating will be based on established good practise and the approach will ensure the growing transport needs of Cork City are serviced by sustainable and active travel modes where such infrastructure is delivered as prescribed in CMATS.

4.2 Summary of Other Submissions Received (Grouped Thematically)

4.2.1 Support for Variation

Five submissions (**4, 19, 25, 28 and 42**) support the Proposed Variation. These generally consider it is a reasonable and practical interim approach to ensure that the economic potential of the City, including its strategic employment areas, can continue to be realised in the face of increased global competition for new business development and inward investment, pending the implementation of the significant public transport interventions envisaged in the Cork Metropolitan Area Transport Strategy.

Two submissions recommend the inclusion of additional text. Submission **25** advocates the inclusion of additional text change in advance of adoption to promote the sharing and dual use

of parking spaces within mixed use communities and developments. Submission **28** suggests some additional text to paragraph 4.105 regarding the public accessibility of Car parking reviews plus additional text after 11.238 relating to linking further updates with delivery and operation of public transport upgrades.

Chief Executive's Response and Recommendation

The comments in the submissions are noted. Some further amendments to the Parking Zones, Parking Standards and further text changes are proposed on foot of statutory consultations received. These will ensure stronger alignment with higher level Plans.

4.2.2 Inconsistent with higher level Plans and Guidelines

A large number of **submissions (1, 3, 5, 6, 7, 11, 12, 14, 15, 17, 18, 20, 22, 23, 24, 26, 29, 30, 31, 34, 35, 37, 39, 40, 41 and 43)** have raised concern that the proposed Variation, especially the reclassification of the Parking Zones, does not achieve an integrated approach to land use transport planning, consistent with the requirements of the NPF (NPO 13), RSES (specifically RPO 151, RPO 152, RPO 160, RPO 163, RPO 164 and RPO 176), 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 under the National Planning Framework. The proposal is also considered contrary to the City Development Plan's 15-minute City Model which advocates sustainable and active travel, a healthy, inclusive, diverse and a connected city. A number of submissions also highlight (17 and 31) that the proposed standards are inconsistent with the Sustainable Urban Housing: Design Standards for New Apartments' Guidelines (2020) which promote a significant reduction or elimination of the need for car parking in highly accessible locations.

Chief Executive's Response and Recommendation

A number of modifications are now proposed to the Parking Zones 2 and 3 to create a clearer hierarchy reflecting existing and planned public transport provision across these Zones. For Zone 2 this will now be expanded to include the most Public Transport accessibility Suburban areas of Blackpool, Wilton, Mahon, Ballincollig Town Centre and Douglas (previously Zone 3) and some modifications are proposed to the parking rate for a limited number of destination uses (offices, enterprise and employment) to address concerns raised by statutory consultees and in other submissions received.

It is also recommended that the Urban Towns of Blarney, Tower, Glanmire and Ballincollig (excluding Ballincollig Town Centre), lands between Ballincollig and the western City suburbs and Cork Airport are reclassified from Zone 4 to Zone 3, reflecting planned and committed improvements in public transport services within the CMATS. Modifications are also proposed to the parking rate for a number of destination uses in this zone to create lower maximum car parking standards (See OPR response).

Further text is proposed to shorten the review timeline to 1 year and allow for discretion in the application of locally based standards having regard to available transportation technology. In

this regard, a commitment is made to develop an accessibility rating tool, in consultation with the NTA, based on best practice to determine the most appropriate car parking standard on an area basis across the City. This will help futureproof the delivery of public transport provision planned and committed under CMATS.

These proposed revisions will be reflected in an updated map and will cumulatively create stronger alignment between the City Development Plan, National Planning Framework and Regional Spatial and Economic Strategy for the Southern Region. As per the Sustainable Urban Housing: Design Standards for New Apartments' Guidelines (2020), the Proposed Variation applies a maximum approach to parking and a revised tiered car parking standard based on public transport accessibility.

4.2.3 Contrary to Climate action targets

A significant recurring issue raised during the public consultation process is the revised car parking approach and its impacts on securing Climate Action targets (**submissions 1, 3, 5, 7, 8, 9, 10, 11, 12, 13, 15, 16, 20, 21, 24, 27, 29, 32, 33, 34, 36, 37, 38, 39, 40, 41, 43**). Issues raised include the adopted Cork City Development Plan's modal share targets for the plan period, which is an important tool to focus action on 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.

Submissions also note that the modal share targets form part of one of the strategic principles of the Plan. Cork Metropolitan Area Transport Study (CMATS) is the delivery mechanism to develop sustainable and active travel and secure a transformed sustainable transport system with a significant shift toward walking, cycling and public transport across the City. It is considered the Variation represents a very significant risk to achieve these modal share targets. It is considered that the revised approach will encourage car dependency and may also undermine the viability of public transport and create conflicts to establish bus corridors and conflict points for future planned bus and light rail movements.

Furthermore, numerous submissions have cited the International Climate Change Policy (SDG 13) from the 2030 Agenda for Sustainable Development which seeks urgent action to prevent the worst results of climate change. This proposal is considered contrary to this, as it increases car parking citywide which will encourage further car dependency, car usage and associated congestion.

Chief Executive's Response and Recommendation

Cork City Council is committed to Climate Action and has been selected as one of Europe's leaders in becoming a climate neutral and smart city by 2030 as part of the EU Cities Mission. The City Development Plan enshrines International and National Climate legislation and sets out a clear and cross-cutting policy framework on how the City will achieve climate change mitigation and adaptation through the Plan period. The proposed modifications arising from the submissions which include revised Car Parking Zones, a reduction in a number of Car Parking Standards for

destination uses, text changes (including a commitment to a shorter 1-year review period) will together create a framework that will result in lower trip generation and create more favourable conditions for transit oriented development, as envisaged by CMATS. This will help the achievement of targets set out in the Climate Action Plan 2021.

4.2.4 Environmental Screening Obligations

The Environmental Protection Agency (**submission 2**) provided an overview of its role and function. It advised that Cork City Council should determine whether or not the implementation of the proposed Variation would be likely to have significant effects on the environment. In this regard reference is made to Schedule 2A of the SEA Regulations (S.I. No. 436 of 2004 as amended by S.I. No. 201 of 2011) which sets out the ‘Criteria for determining whether a Plan is likely to have significant effects on the environment’. A list of available guidance and resources is stated. Reference is made to the publication of ‘State of the Environment Report’ – Irelands Environment 2016-An Assessment (EPA, 2016), whereby it is recommended that the recommendations, key issues and challenges described within this report should be taken into account, as relevant and appropriate to the Variation. It advises that future amendments to the Variation should be screened for potential for likely significant effects in accordance with the criteria as set out in SEA Regulations Schedule 2A (S.I. No 436 of 2004). Reference is made to requirements to comply with the Habitats Directive and to consult with a number of Environmental Authorities.

Chief Executive’s Response and Recommendation

Strategic Environmental Assessment (SEA) represents a key statutory element in the preparation of the proposed Variation. Cork City Council prepared a Screening Statement for SEA which went on public display as part of the Proposed Variation. Notice was provided to Environmental Authorities in accordance with Article 13 K(3) of the Planning and Development Regulations 2001, as amended. The SEA screening process concluded that the implementation of Proposed Variation No. 1 to the Cork City Development Plan 2022-2028 will not give rise to any adverse environmental effects and therefore, the Proposed Variation does not require strategic environmental assessment (SEA). Environmental Assessment is an iterative process however and any proposed modifications to the Proposed Variation will also be subject to SEA assessment. Cork City County Council also carried out an Appropriate Assessment screening. This screening assessment was carried out in accordance with the requirements of Article 6(3) of the EU Habitats Directive (92/43/EEC). Appropriate Assessment is also an iterative process and any proposed modifications to the Proposed Variation will be subject to AA screening. The seven key actions identified by the EPA in their recent publication “Ireland’s Environment – An Assessment 2016” are key parameters from the Council’s perspective and are noted. Environmental screening will be undertaken at each stage of the Variation process.

5.0 Next Steps

The Members of the planning authority are required to consider the Proposed Variation and this Chief Executive's Report. If the planning authority, after considering a submission, observation or recommendation from the Minister, Office of the Planning Regulator or Southern Regional Authority, decides not to comply with a recommendation made by either, it shall so inform the Minister, Office of the Planning Regulator or Southern Regional Authority as soon as practicable in writing and shall include the reasons for the decision.

The consideration of the variation and the Chief Executive's Report shall be completed not later than 6 weeks after the submission of the Chief Executive's Report to the members of the planning authority.

Having considered the proposed variation and Chief Executive's Report, the Members of the planning authority may, by resolution, either:

1. Refuse to make the variation.
2. Make the variation with or without further modification.

A modification to the variation, must adhere to the following:

- (i) may only be made where it is minor in nature and therefore not likely to have significant effects on the environment or adversely affect the integrity of a European site,
- (ii) shall not be made where it refers to—
 - (I) an increase in the area of land zoned for any purpose, or
 - (II) an addition to or deletion from the record of protected structures.

3. Make the variation with a Material Alteration.

If it is resolved to make the variation with a change that constitutes a material alteration to the variation, the planning authority must review the alteration in the context of SEA and AA and determine its implications (if any) on the environment. Revised notices and a public consultation stage follows.

APPENDIX 1: List of Submissions and Summary of Issues Raised

Ref.	From	Issue Raised
1.	Kevin Long	The submission notes the Proposed Variation will facilitate more land use for parking in the city suburbs than the previous standards. Providing more space for car parking is not consistent with the City Development Plan and National climate action goals for reducing high car dependency and encouraging modal shift to sustainable transport modes, walking, cycling and public transport.
2.	Environmental Protection Agency	Submitted broad guidelines for assessing the Proposed Variation, states that service infrastructure should be in place or be required to be put in place to service the site during the lifetime of the Development Plan, and states that the Proposed Variation should be in alignment with higher-level plans and programmes, including national commitments on climate change mitigation and adaptation. The submission further references resources that can be used in assessing environmental impacts of the variation.
3.	David Teixeira-Lynch	The submission strongly objects to the Proposed Variation as it will facilitate more private parking. The Proposed Variation goes against and is not consistent with the City Development Plan, Climate Action Plan, CMATS etc. It would also create further complexities for BusConnects. Current standards and associated zones, especially relating to Ballincollig and Douglas, should be maintained.
4.	JCD Group	The submission notes that the Proposed Variation is a reasonable and practical interim approach to ensure that the economic potential of the City, in particular in its strategic employment areas, can continue to be realised in the face of increased global competition for new business development and inward investment, pending the implementation of the significant public transport interventions envisaged in the Cork Metropolitan Area Transport Strategy.
5.	Niamh Guiry	The Proposed Variation would be a step backward for achieving our vision of a 15-minute city. The Strategic Vision of the Cork City Development Plan 2022-2028 includes sustainable and active travel, a healthy, inclusive, diverse and connected city. The third Strategic Objective for Growth is 'Transport and Mobility - Integrate land-use and transportation planning to increase active travel (walking and cycling) and public transport usage'. The Proposed Variation does not align with local commitments to sustainable development, climate action, or the objectives and sustainable ethos of the Development Plan. Furthermore, the Proposed Variation directly conflicts with National climate action targets and commitments to ensure sustainable mobility and a transition to a low carbon and climate resilient society. The submission claims Cork City is already car-centric, and this needs to change. The Proposed Variation benefits private parking, and Cork City Council should instead focus on developing sustainable infrastructure, greening our urban environment and creating a culture that facilitates people to make trips easily by bike, foot, or public transport.
6.	Transport Infrastructure Ireland (TII)	TII considers the approach promoted in the Proposed Variation, specifically in Zones 3 & 4, will encourage private car dependency and undermine active travel and public transport provision in the short to medium term creating an adverse impact on the National road network. TII recommends that the Proposed Variation is paused to address these matters including consultation with the NTA and TII with regard to developing an appropriate car-parking regime for the city.

Ref.	From	Issue Raised
7.	Prasanna Ramaswamy	The submission opposes this variation. Moving city suburbs and towns into zones with higher maximum parking standards is a retrograde step especially in the face of climate emergency and reducing private car dependency. This also goes against various policy documents such as CMATS, National Planning Framework and National Development Plan.
8.	Alan O'Connor	In 2022 there is no need to relax parking requirements in the city. The ambition should be to encourage car-free developments for climate, for sustainability, and for a more liveable city. On a national policy basis, the Proposed Variation conflicts with Ireland's ambition under the Climate Act of reducing transport emissions by 50% by 2030. It advocates building a city for pedestrians, cyclists, and public transport, not cars.
9.	Eoghan McCarthy	The submission notes that more parking will mean more cars and more congestion. The city is currently far too car dependant. Increasing parking will increase traffic, harm the climate, delay buses, and increase rent / house prices. These proposals are not compatible with the Climate Action plan. This variation proposes to shrink urban zones allowing continued building of low-density car-dependent developments in the inner city. The city should be moving to limit access of private motor vehicles into the centre. This will only encourage more volumes of vehicles on our narrow city roads. Cork should be moving to sustainable transport and away from traffic congestion, CO2 emissions, and air pollution.
10.	James McCloskey	The submission is opposed to increasing the maximum size of car parks for private businesses, which is not environmentally friendly nor in the interest of those who live or work in Cork. This is in direct conflict with international environmental targets. More plans need to be put in place to pedestrianize streets, build and improve cycling infrastructure and improve public transport.
11.	Diarmuid Clayton	The Proposed Variation is contrary to the current Cork City Development Plan, as well as local and national targets related to climate action, sustainable transport, and liveable cities. If implemented, it would only serve to further entrench private car dependency and the associated carbon emissions and air pollution, which have detrimental impacts on public health and the environment. The recent OECD report 'Redesigning Ireland's Transport for Net Zero' outlines that reallocating space away from cars has transformative potential. Sustainable transport and active travel need to be the focus for the City.
12.	Enda Boyle	The submission strongly objects to the Proposed Variation as it is incompatible with CMATs and making Cork a net zero city by 2030. A creative approach to parking needs to be considered given the need to tackle the housing crisis and climate emergency.
13.	Fergus Kenny	Providing allowances for more car parking in developments within the city boundary is not supported as it will increase car dependency and perpetuate the issues of pollution (and consequently public health), high traffic (impacting peoples time), and impact on the need to improve a shift towards sustainable travel. This is contrary to City Council statements regarding road capacity in the city and how, and "the existing city street network does not have further capacity to accommodate increasing private car usage".
14.	Patrick Buttimer	The submission strongly objects to the change in land use for private parking in the Proposed Variation to make it easier for more private parking. This goes

Ref.	From	Issue Raised
		against and is not consistent with the City Development Plan, Climate Action Plan, CMATS etc. It would also create further complexities for Bus Connects. The retention of the existing Parking Zones is suggested, especially Ballincollig and Douglas.
15.	Oliver Moran	The Proposed Variation is contrary to national policy, which is to encourage active and sustainable transport use and to discourage private car use. It would undermine the city's own ambition as an EU Mission City to be climate neutral by 2030, having already recognized and declared a climate emergency in the city in 2019.
16.	Shane Calnan	The submission objects to the Proposed Variation which would result in an increase in the maximum allowable car parking at developments in the city. Part of the justification given for the changes is the length of time it will likely take to implement BusConnects and the future Cork Light Rail system and the hope is that this measure will alleviate traffic and mobility problems in the interim. Increasing parking will have the opposite effect of encouraging car dependence long term, which will persist beyond the introduction of the public transport measures, and increasing usage, traffic, and pollution short and medium term.
17.	Kevin Burke	The submission makes a number of observations relating to the Proposed Variation. In relation to Zone 2/3, the most commonly applied catchment for car-free/lite distance from public transport is 800m-960m, not 500m as referenced in the Development Plan; the Proposed Variation is at odds with the National Planning Framework and Apartments Guidelines for car free or substantially car free development in the 5 cities and/or within close proximity to existing or planned public transport corridors; the proposed changes will lock-in car dependency particularly in areas already under significant congestion such as Douglas and many other locations listed in zone 3; it will undermine the viability of public transport and create further conflict to establish bus corridors and conflict points for bus and light rail movements in the case of both on-street and car free provision. The use of Area based parking or 'parking at distance' to overcome perceived shortcomings in residential provision is suggested as a solution to demand management.
18.	Fergus Hurley	The submission is opposed to the provision of more parking spaces in the Proposed Variation.
19.	Department of Transport	The submission welcomes this proposal.
20.	Lee2Sea Greenway Organising Committee	The proposed variation is considered a deeply retrograde step that contradicts the high-level objectives of the city's Development Plan. Specifically, relaxing parking standards is intended to and will facilitate higher levels of vehicle ownership and use. This will impact on Cork's commitment to reduce climate emissions in line with its ambition to be a Climate Neutral City; will increase vehicle use associated traffic congestion thereby reducing the reliability of public transportation; decreases the land available for housing and impacts on public health.
21.	Aiden Halloran	The submission is against any increase in car parking in the city as it weakens our commitment to dramatically increasing public transport and cycling infrastructure. Increasing car parking spaces will simply result in more cars. It is a very primitive move and at odds with any serious climate action plan.

Ref.	From	Issue Raised
22.	Brian Murphy	The submission notes the parking area for residential property will be increased in the city overall, at a time that the city is spending large amounts of money and effort to try to encourage modal shift away from cars. It appears the suburbs may have moved from Zone 2 to Zone 3, thus increasing their maximum parking areas significantly. It may simply be the case that the definition of Zone 2, "Accessible to Mass Transit" needs to be explicitly declared, to help clarify the issue.
23.	Michael Carroll	The submission is against the Proposed Variation as it facilitates wider car use in Cork and undermines initiatives to reduce car dependency. After BusConnects and LRT are successfully implemented might be a good time to start the conversation about increasing parking provision. It notes that zone 1, where parking would be reduced, will be made much smaller and the maximum parking thresholds will be increased in all other zones. It is considered that this approach would be an obstacle on the journey towards a sustainable city.
24.	Mike Spillane	It is considered that the changes will encourage private car use and will likely undermine active travel and public transport creating a situation which will put pressure on the existing road network. Given our national climate action goal obligations and the country having declared a climate and biodiversity emergency, allocating more space for car parking is not consistent with this or with the City Development Plan for reducing car dependency and a modal shift to sustainable transport modes. The Proposed Variation could complicate the work being done on BusConnects.
25.	HW Planning on behalf of Hibernia Star Limited	The submission welcomes the City Council's decision to implement a demand management approach in terms of parking. It advocates the inclusion of additional text change in advance of adoption to promote the sharing and dual use of parking spaces within mixed use communities and developments.
26.	Orla Burke	Requests that Cork City Council rejects this Proposed Variation. Developments that get approval and are built during this proposed period will serve as accommodation for up to 100 years or more. A short-term approach to this specific part of the Development Plan has the potential to affect populations in Cork City that have not even been born yet. The standards set out in our original City Development Plan are sound and should not be altered.
27.	Mary Venables	The submission appreciates the City Council's commitment to maximum, rather than minimum, parking standards and welcomes the inclusion of development close to public transport corridors in Zone 2 parking standards. Concern is raised, however, that increasing the number of neighbourhoods and suburbs classified as Zone 3 and Zone 4 is at odds with Cork's laudable ambition to become carbon neutral by 2030. Parking spaces will be a barrier to sustainable and active transport by ingraining car-based habits. The Proposed Variation should be rejected and instead works should continue their work to make Cork a more liveable, attractive and climate neutral city.
28.	McCutcheon Halley on behalf of Apple Operations Europe Ltd.	The submission agrees that there is a gap between what is envisioned for public transportation in the City and what is available on the ground. It notes that the Proposed Variation is a welcome response to introducing these transitional measures to the Cork City Development Plan 2022 and will support continued employment growth in the City. Additional text is proposed to paragraph 4.105 regarding the public accessibility of car parking reviews and in new paragraph

Ref.	From	Issue Raised
		after 11.238 relating to linking further updates with delivery and operation of public transport upgrades.
29.	Transport and Mobility Forum Cork (TMF)	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 and enable improved public health, economic growth and substantially reduced carbon emissions within the City. It advocates that there should be no significant modification of the boundaries of existing Zones that define the varying limits for parking provisions. While it notes 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 that would allow a significant increase of the allowed number of on-site car parking spaces in large parts of the City.
30.	Southern Regional Assembly	The submission notes traffic and transportation impact assessments are a strengthened requirement for Development Management as part of the Variation. In addition, evidence-based monitoring of the impacts of car parking standard implementation across the City will be undertaken. The changes to standards and the Parking Zones are noted. Effective demand management to reduce private car trip generation and integrated land use and transport planning in the catchment of public transport corridors would be strengthened by aligning Table 4.6 to the demand management principles outlined in new text in Chapter 11. This needs to be considered in the final assessment of the variation as it will create greater alignment with the RSES policy Objectives RPO 151, RPO 152, RPO 160, RPO 163, RPO 164 and RPO 176.
31.	Office of the Planning Regulator (OPR)	Serious concerns have been raised regarding the excessive car parking standards for the city suburbs and Urban Towns which are identified for significant public transportation infrastructure upgrade. The proposed approach could undermine delivery of this infrastructure. 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 OPR sets out a recommendation 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.
32.	Louise O' Donnell	The submission opposes the revised maximum car parking standards, and inclusion of city suburbs in Car Parking Zone 3 as it will deliver a greater volume of car parking for the city suburbs. There cannot be a modal shift to sustainable development while the City continues to enable increased vehicular traffic. The Cork City Development Plan 2022-2028 Strategic Objectives, which align with those of the United Nations Sustainable Development Goals, commits to increase active travel and public transport use (Strategic Objective 3), a transition to a low-carbon, climate-resilient and environmentally sustainable future (Strategic Objective 4) and enhanced protection for our natural landscape, maritime heritage and green and blue infrastructure (Strategic Objective 5). The proposed contravenes several crucial Strategic Objectives of the Cork City Development Plan. The Climate and Biodiversity Crisis cannot be addressed by this Proposed

Ref.	From	Issue Raised
		Variation. The Intergovernmental Panel on Climate Change 2022 Report is explicit, the time for action on Climate Change is now.
33.	Green Spaces for Health	The submission is concerned about increasing the maximum parking allowed in Ballincollig, where there is public transport (albeit a bus service that has capacity issues). The concern is that allowing for higher maximum car parking standards allows for the creation of more parking, which isn't going to disappear once we have better public transport. It advocates less car parking, a retention of our existing green spaces and the creation and establishment of more green spaces for our health and wellbeing, for nature and the natural environment.
34.	Darren Mc Adam-O' Connell	The submission strongly opposes the Proposed Variation of the City Development Plan as increased parking provision will result in negative impacts including: increased congestion, increased air pollution, increased housing costs, increased urban sprawl, increased GHG emissions, increasingly hostile streets for pedestrians and cyclists, reduced housing availability, reduced density, reduced quality of life and hence reduced economic competitiveness.
35.	Cork CS/BW	<p>Opposes the Proposed Variation and supports the existing City Development plan limits on parking.</p> <ul style="list-style-type: none"> • The Proposed Variation is incompatible with achieving a dense, walkable, liveable, and diverse city capable of attracting and retaining mobile international talent and the majority of points of interest to our members which we raised in our submissions on the city development plan process. • The reduction in parking intensity in the city is a priority for as it is a requirement for increasing housing supply and lower housing costs; Refocusing growth from distant inaccessible suburbs to the urban centre; Increasing density; Reducing motor traffic on the streets • Opposes the change to the boundaries of the parking zones as the existing zones in the City Development Plan are logical and well planned and the proposed zones would allow a high level of parking provision in areas where it cannot be justified should as close to the city centre and the centre.
36.	Joe Breen	The submission is opposed to the Proposed Variation. There is a climate emergency so no further initiatives to induce further car usage should be approved or sought. The Proposed Variation goes against the City Development Plan. There should be a reduction in car usage and car parking. The priority should be that existing car parking should be removed and given towards people walking and cycling and to enable BusConnects to be successful. We need more people living in the city centre without cars and more public space free of parked cars and private storage of cars.

Ref.	From	Issue Raised
37.	Cork Environmental Forum	<p>The submission opposes the Proposed Variation for the reasons outlined below:</p> <ul style="list-style-type: none"> Increasing the allowable parking maxima is contrary to the city's and national commitments in relation to compact growth and reducing carbon emissions. Allowing the Proposed Variation will encourage sprawl which will exacerbate the harm we are causing to climate and biodiversity. <p>The zones in the current City Development Plan are well-planned and logical reflecting the current accessibility of local services and public transport with strict limits only in areas of already very low car dependency. The Proposed Variation's zones have no rationale and do not reflect the current accessibility of public transport and ease of use of active travel. Placing such a large area in zone 4 encourages sprawl and consequently the loss of natural habitat rather than compact growth with implications for the current biodiversity crisis. We are at a critical juncture where we need to see even greater leadership on climate and biodiversity. Cork City has ambitions to accelerate its journey to becoming a carbon neutral city, pushing through a variation of this nature is completely contrary to the aims of the city in this regard and the express wishes of a growing public who are sensitised to the urgency of the need to act now to address the worst impacts of a changing climate and to halt the loss of nature in the city.</p>
38.	J O'Sullivan	<p>Cork City Council and the Irish government declared a climate emergency a few years ago. This should be kept in mind in every decision our public bodies take. Increasing car parking in an already congested city during a climate crisis is wrong.</p>
39.	Tony Quirke	<p>The submission strongly objects to this proposal as it will invariably increase car dependency and perpetuate the issues of pollution (& consequently public health), high traffic (impacting peoples time), and impact on the need to improve a shift towards sustainable travel. The revision goes against the current Cork City Development plan, as well as local and national targets related to climate action, sustainable transport, and liveable cities.</p>
40.	Talia Huffe	<p>According to SDG 13 urgent action is needed to prevent the worst results of climate change. The Proposed Variation would seem to be completely contrary to this, as it increases car parking citywide which will only encourage further car dependency and car usage. According to your own press release 11.11.22 "The existing City street network does not have further capacity to accommodate increasing private car usage." Additionally, SDG 11.2 & 11.3 state that cities should be investing in a rapid shift towards sustainable energy and transport systems while improving human settlements and city experience. Additional car parking does not enhance city living as has been proven worldwide, and also decreases the economic development of the area.</p>
41.	Karla Santos	<p>The submission strongly objects to the Proposed Variation. Increasing any car parking standards in the city and relevant zones is contrary to the active travel objectives promoted at national level and will not encourage the take-up in active mobility. Furthermore, in an environment promoting net zero emissions by 2050, advancing proposals that encourage private car travel seems to contravene national policy, and global targets.</p>
42.	Department of Education	<p>The Department welcomes the focus from minimum parking to maximum parking and requests the Council adopts this approach to school building projects as part of the development management process.</p>

Ref.	From	Issue Raised
43.	National Transport Authority (NTA)	<p>The NTA considers that the Proposed Variation should not be made, and that additional work needs to be undertaken before any changes to the adopted Development Plan’s parking standards are considered. The proposed changes to Table 11.13 (Parking Standards) and Table 4.6 and associated Parking Zones Map are not supported, as it is considered these changes would result in a significant relaxation of parking standards for a broad range of land uses across many city suburban and urban town locations in areas where substantial improvements in public transport services are planned for and committed to in the short to medium term. The Proposed Variation represents a risk to the achievement of the stringent targets set out in the Climate Action Plan 2021 as they relate to transport and notably the measures set out under section 15.3.2 (System Efficiency and Demand Management), including ‘reducing parking provision’.</p>

APPENDIX 2: Updated Parking Zone Map

