

The Senior Planner,  
Cork City Council,  
Planning Policy Unit  
Floor 13, County Hall,  
Cork

16<sup>th</sup> January 2014

**RE: National Transport Authority's submission on the Proposed Amendment to Carrigaline Electoral Area Local Area Plan 2011 – Amendment No. 2 "South Environs – incorporating Douglas Land Use and Transportation Strategy**

Dear Sir,

The National Transport Authority would support an amendment to the local area plan, to include reference to the Douglas Land Use and Transportation Strategy (DLUTS).

As stated in its submission on the DLUTS Draft Final Report,

" ... the National Transport Authority (NTA) is satisfied that the issues raised and discussed during a succession of meetings with Cork County Council and the Public Agencies Consultative Group have been adequately reflected in the outcome of the Study. It is understood that the Study will provide the basis for future investment in transport measures and that the design of those measures will follow on from the completion of the Study.

During the course of the Study, the purpose of the NTA's involvement was to advise the County Council in regards to the Study's key objective – to ensure that there is an integrated approach to land use and transport planning for the future development of Douglas, and how this relates to the NTA's primary functions in the Cork Metropolitan Area, namely:

- The planning and regulation of public transport services;
- Transport integration and Transport Demand Management;
- Facilitating and influencing the integration of land use and transport planning at a strategic level; and
- The operation of the Five Year Transport Investment Frameworks (2013-2017) for the Cork Metropolitan Area.

In regards to the Five Year Transport Investment Framework, the NTA is satisfied that the measures identified in the Study for implementation are, in general, consistent with the current focus of investment in the Douglas area and in particular, those measures which focus on the promotion of local accessibility to the Village Centre by walking and cycling modes and the facilitation of improved public

transport services into and through the Village Centre, coupled with complementary traffic management and targeted transport demand management measures such as parking management.”

It is the NTA’s expectation that the prioritisation of transport investment in Douglas will be undertaken in tandem with that of the Five Year Transport Investment Framework over the coming years. In this regard, the NTA looks forward to working with Cork County Council.

Also, in order to obtain the maximum benefit from investment in sustainable transport measures, the NTA would emphasise the importance of development consolidation within the South Environs area generally and in particular within those areas where the greatest potential exists for the improvement of accessibility to facilities at the local level, thus reducing the need for car use and increasing the potential for walking, cycling and public transport use.

### ***Comments on Proposed Amendments***

#### **Paragraph 1.4.12**

The following change is recommended to the last sentence:

“ ... in particular focusing on a major shift towards ~~other transport modes~~ **walking, cycling and public transport** in line with **the objectives and guidance set out in national priority of Smarter Travel and the Design Manual for Urban Roads and Streets (DMURS)**”.

#### **Paragraphs 1.2.15 and 1.4.16**

Whilst paragraph 1.2.15 emphasises the need for Douglas to *extend its range of comparison shopping* so that it can rival other suburban centres, paragraph 1.4.16 refers to there being *less emphasis on additional retail provision*.

From Section 8.3 of the DLUTS, the following is stated:

- “*The strategic aim for land use in the period 2013-2022 is to encourage the filling of vacancy of at least 50% of existing levels. This could result in approximately 5,000 sq.m of retail floor space ...”;*
- “*In addition, the land use strategy intends to support new development of additional retail uses in line with current commitments. This could result in an additional 4,700sq.m of floor space.”;*
- “*The DLUTS Land Strategy will ensure that retail development is plan-led (the requirement that future retail development should first be set out in Development and Local Area Plans) ...*”.

[Emphasis Added]

From the *Cork Metropolitan Area Draft Retail Strategy 2013*, the following is noted:

- Douglas District Centre currently has 12,255 sq.m of comparison retail floorspace, with a proposed increase of around 25,000sq.m in comparison floorspace across all suburban centres (Blackpool, Wilton, Douglas, Mahon) between 2011 and 2022;

- In Policy 3, the Draft Retail Strategy also states that there should be "... an emphasis on convenience and appropriate comparison shopping, in order to protect the primacy of Cork City Centre";
- In relation to retail vacancy levels, paragraph 6.3 states that "It is a key aim ... to significantly reduce retail vacancy levels in the short term by 50%, half of which should be occupied by retail uses ...".

As the proposed amendment to the LAP does not set out the overall anticipated increase in retail floorspace in Douglas, or that relating to comparison retailing, greater clarity on this matter would be desirable. Related to this, provision for additional retail floorspace in Douglas should be informed by:

- the need to safeguard the pre-eminence of the City Centre in regards to comparison shopping,
- a clearly defined retail catchment; and
- a presumption that priority will be given to the improvement of accessibility by non-car modes within its defined catchment, rather than an objective to attract car-based trips from the wider area.

Paragraph 1.4.15

The following changes are recommended:

" ... This was achieved through involvement of the key stakeholders in the project preparation process at regular intervals (~~every month~~), ~~Not only does the project provide~~ **providing** a robust implementation schedule. ~~it is successful in achieving changing the attitudes of local population towards the use of the motor car in travel options and~~ **In doing so, it is hoped that this will be successful in changing attitudes towards, increasing awareness of and facilitating the use of non-car modes including walking, cycling and public transport**".

Paragraph 1.4.16

The following addition is recommended to the last sentence:

"This will, in turn, permit some work trips to be done by walking, ~~or~~ cycling, **or public transport** and reduce car trips and traffic congestion".

Paragraph 1.4.56

The following changes are recommended:

"The DLUTS transport strategy ~~is consistent with~~ **has been informed by** recent local, regional and national policies **and guidelines** such as ... "

Yours sincerely,



Hugh Creegan

**Director of Transport Investment and Taxi Regulation**