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

15th September 2015

Re: Proposed Amendment to the Midleton Electoral Area Local Area Plan 2011
Incorporating Carrigtwohill North and Water-Rock Framework Masterplan Studies

Dear Sir,

In regards to the preparation of the masterplans informing the LAP amendments, it is evident that a strong emphasis has been placed on the integration of land use and transport planning at the local level, through the phasing of development with supporting transport infrastructure and services. The National Transport Authority strongly supports this approach.

In respect of the proposed amendments, and further to previous comments made to the Council on 5th May 2015 and 22nd December 2014, the Authority puts forward a number of comments and specific amendments, for the Council’s consideration. These are set out below.

Amendment no.2 Carrigtwohill X-01

Paragraph 1.2.29
Proposed Rewording: ... a cycle network strategy study .. the objective of this strategy study was to ... The plan study when completed, will identifies routes, ...

Paragraph 1.2.30
Comment: The Authority would support the objective of improving accessibility between the masterplan lands and the lands south of the railway line.

Paragraph 1.2.33
Comment: In regards to the objective of preparing a rail network study, the Authority would agree that the South West Regional Transport Model would provide an important basis for this, which is expected to be available within the next few months.
With the recent publication by the Department of Transport, Tourism and Sport, of their *Strategic Investment Framework for Land Transport (SIFLT)*, the Authority will be involved in a number of its *Implementation Priorities and Actions*, including the development of a new rail policy.

Under *Action 6* (A new rail policy will be developed by DTTaS to address the future role of rail transport in Ireland), SIFLT states that:

“A new rail policy will be developed following a wide-ranging public consultation, which will address key questions, including how to focus rail investment on where rail has, or will have its greatest strength, reflect any social and environmental considerations uniquely addressed by the rail network in addition to securing value for money, an affordable scale of network and considering the economic and investment context.”

It is the Authority’s view that the rail network study, proposed by the Council, would most appropriately be undertaken, following completion of SIFLT’s Action 6, the recommendations of which would serve to inform all future investment in rail in the Cork Metropolitan Area.

**Proposed rewording:** On completion of a new rail policy to address the future role of rail transport in Ireland, as required under DTTas’ *Strategic Investment Framework for Land Transport (SIFLT) Action 6*, a study of the Cork Metropolitan Area’s future suburban rail network requirements should be considered. This could include consideration of additional stations, rail service patterns and interchange with other modes.

**Paragraph 1.4.17**

**Proposed Rewording:** Second bullet point: The Cork Metropolitan-Cycle-Strategy Cycle Network Study was prepared …

**Proposed Rewording:** Fourth bullet point: … Department of Education and Skills, NRA (now Transport Infrastructure Ireland), the National Transport Authority (NTA), in 0214 2014.

**Paragraph 1.4.26**

**Comment:** In reference to “the achievement of a modal shift to support the continued viability of the Cork-Midleton Suburban Railway”, the emphasis here needs to be on the rationale for the location of development in Carrigtwohill, on the basis of its serviceability by rail and bus-based public transport and the role which development consolidation within existing settlements on public transport corridors has in providing the basis for investment in future public transport service provision.

**Paragraph 1.4.28**

... if a range of transport measures are delivered to help secure high level of modal shift, including; (none of the transport measures are listed here).

**Comment:** In listing the “range of transport measures ... to help secure higher level of modal shift”, in addition to rail, reference should also be made to the role of bus, in meeting the future public transport requirements of Carrigtwohill and the masterplan lands.
**Insert:** Future bus service provision and the potential for bus to meet the future public transport requirements of Carrigtwohill and the masterplan lands will be considered as part of a package of transport interventions. This will include the provision of high levels of permeability within and between new and existing development areas, which facilitates the operation of bus services through these areas, at an early stage in their development.

**Comment:** It would be helpful if the mode split assumptions and trip distribution assumptions underpinning this assertion were referenced under this paragraph, including the associated assumed public transport service levels/ service patterns for rail and bus.

**Paragraph 1.4.39**
**Proposed Rewording:** It is proposed that Cork County Council and other agencies, including the National Roads Authority (now Transport Infrastructure Ireland), the National Transport Authority (NTA) and Irish Rail, will, subject to agreement with the relevant agencies and programming, be responsible for the funding and / or implementation of the measures ...

**Amendment No.2 Water-Rock X-01**

Some of the comments and proposed amendments presented above, under Carrigtwohill, are repeated below, where appropriate.

**Paragraph 1.2.29**
**Proposed Rewording:** ... a cycle network strategy study .. the objective of this strategy study was to ...

**Paragraph 1.2.30**
**Comment:** In regards to the objective of preparing a rail network study, the Authority would agree that the South West Regional Transport Model would provide an important basis for this, which is expected to be available within the next few months.

With the recent publication by the Department of Transport, Tourism and Sport, of their Strategic Investment Framework for Land Transport (SIFLT), the Authority will be involved in a number of its Implementation Priorities and Actions, including the development of a new rail policy.

Under Action 6 (A new rail policy will be developed by DTtAs to address the future role of rail transport in Ireland), SIFLT states that:

“...A new rail policy will be developed following a wide-ranging public consultation, which will address key questions, including how to focus rail investment on where rail has, or will have its greatest strength, reflect any social and environmental considerations uniquely addressed by the rail network in addition to securing value for money, an affordable scale of network and considering the economic and investment context.”

It is the Authority’s view that the rail network study, proposed by the Council, would most appropriately be undertaken, following completion of SIFLT’s Action 6, the recommendations of which would serve to inform all future investment in rail in the Greater Cork Area.
Proposed rewording: On completion of a new rail policy to address the future role of rail transport in Ireland, as required under DTTAS' Strategic Investment Framework for Land Transport (SIFLT) Action 6, a study of the Cork Metropolitan Area's future suburban rail network requirements should be considered. This could include consideration of additional stations, rail service patterns and interchange with other modes.

Paragraph 1.4.19
Comment: Under the “range of transport measures ... to help secure higher level of modal shift”, no reference has been made to the role of bus, in meeting the future public transport requirements of Midleton and the masterplan lands. It is recommended that a reference to bus in included in the LAP.

Comment: It would be helpful if the mode split assumptions and trip distribution assumptions underpinning this assertion were referenced under this paragraph, including the associated assumed public transport service levels/ service patterns for rail and bus.

Paragraph 1.4.30 (Implementation and Infrastructure Provision)
(Rail) Comment/ Rewording: See comments and proposed rewording under Paragraph 1.2.30.

(Bus) Insert: Future bus service provision and the potential for bus to meet the future public transport requirements of Midleton and the masterplan lands will be considered as part of a package of transport interventions. This will include the provision of high levels of permeability within and between new and existing development areas, which facilitates the operation of bus services through these areas, at an early stage in their development.

The Authority would support the inclusion of an Implementation Monitoring Framework for transport infrastructure and public transport services is established for both Carrigtwohill and Midleton and their respective masterplan areas, involving a number of key transport planning and investment agencies, including the National Transport Authority and Transport Infrastructure Ireland.

I trust the Authority’s views will be taken into consideration in the finalisation of the proposed amendments.

Yours sincerely,

Michael Mac Aree
Head of Planning