

Mr Ross Palmer,
Planning Policy Unit,
Cork County Council,
Floor 13,
County Hall,
Cork

20th July 2015

Proposed Amendment to the Carrigaline Electoral Area Local Area Plan – Framework Master Plan

Dear Mr Palmer,

In respect of the proposed amendments and associated documents, the National Transport Authority (the Authority) submits the following observations, for the planning authority's consideration.

Overview

The Authority supports the consolidation of Metropolitan Area-generated population and employment growth within Cork City/ environs and settlements within certain corridors where it can be demonstrated that the associated development supports the basis for investment in improved and better connected public transport services over time, thus allowing for a reduction in car dependency as further growth occurs.

To put the above comments in context, they are guided by the following principles in the location of future development at the strategic (Metropolitan Area) level and in the prioritisation of development locations and planning for development at the local level:

- A transition to higher development densities, particularly within those areas of the City/ environs and the larger settlements that are located within the City Centre area and defined public transport corridors. This is required to enable a reduction in trip lengths and to provide a stronger demand for higher frequency public transport services, over time;
- A transition from car dominated, disjointed development layouts, road design and traffic management regimes to more consolidated development forms. Within such layouts, higher levels of permeability and reduced severance levels can be achieved;
- In addition to this, progressively greater levels of constraint can apply to car-based accessibility and availability of destination parking with proximity to the most central areas within the City/ environs and the larger settlements, concomitant with progressively higher

development densities and levels of priority for pedestrian, cyclist and public transport movements;

- A strong presumption in favour of walking and cycling for local trip-making;
- A strong presumption in favour of public transport and cycling for trips within the City / environs and with/ between the larger settlements;
- A stronger correlation between development density, population/ employment intensity and centrality within the Metropolitan Area in general, and within each centre in turn;
- A stronger emphasis on sequential expansion, focused on the most central parts of the Metropolitan Area (City/environs, defined 'district' centres/ other settlements and strategic public transport corridors; and
- A movement away from discrete single-use development areas towards mixed use development formats.

Based on these principles, within the City/ Environs and larger settlements within the Metropolitan Area, the Authority supports the prioritisation of development in locations which facilitate development consolidation within defined public transport corridors and delivered through the preparation of local area plans. Within these plans, appropriate development phasing, residential and other development densities, mix of uses, layouts and necessary supporting transport networks and services can be determined. This type of mechanism for the prioritisation of development will have a critical bearing on the ability to maximise the benefits arising from investment by the Council, the NTA and other agencies in transport infrastructure, and the delivery of improved public transport services.

General Issues in relation to development at Shannon Park and the further expansion of Carrigaline

The location of the Shannon Park lands and the scale of development proposed, presents a number of significant challenges, the principle challenge being to avoid a further replication of the established pattern of car-dependency, pertaining to the settlement of Carrigaline, as a whole.

The Authority would reiterate its previously stated view that population growth within the Metropolitan Area should primarily be focused on the City/ Environs and a number of nearby larger settlements, located on an east-west transport corridor, within which stronger trip associations can be developed over time, increasingly on the basis of public transport use, for a range of trip purposes within the Metropolitan Area.

In the context of this preference, the Authority would recommend that for any further urban extensions being considered in Carrigaline, including the subject masterplan lands, these should be limited in extent and preferably be informed by the following:

- The development of an integrated land use and transport plan for the Carrigaline area, which would inform the overall scale, phasing, development density and necessary transport infrastructure and services for the masterplan lands and the town as a whole;
- Related to the above point, a clear demonstration of how the masterplan lands can be developed in a permeable manner for bus services, providing good connectivity to the town centre and other significant local destinations, as well as to Cork City and the Ringaskiddy

area, and how significant modal shift away from car dependency can be achieved in Carrigaline as a whole, as a basis for any significant further expansion of the town;

- A clear demonstration that additional development in this area will not negatively impact on congestion on the existing N28, particularly given its strategic function as part of the EU-designated Trans European Network and connecting route to Ringaskiddy, as a nationally-designated Tier 1 port and employment cluster of high economic importance to the region.

Specific Comments on the Proposed Amendments

Transport Investment

In section 4.4.3 of the Proposed Amendment and Figure 4.4 of the Framework Masterplan Study 2015, reference is made to the implementation of the Framework Masterplan being done by land owners / developers in conjunction with, *inter alia*, the NTA, who are responsible for the delivery of key infrastructure.

The Authority currently manages the Department of Transport's funding of Sustainable Transport projects within the Cork Metropolitan Area. The current 5 year transport investment programme includes projects primarily with Cork City and the Douglas area. However, within the existing transport investment programme, the Authority has limited scope for additional investment other than what is currently provided for, but would nonetheless welcome the opportunity to discuss the Council's proposals for the development of sustainable transport infrastructure proposals in Carrigaline.

Public Transport Planning

In relation to the 'N28 Public Transport Upgrade Study', referred to in Figure 4.4 of the Framework Masterplan and in section 1.4.37 of the Proposed Amendment, the NTA has been included among the implementing agencies, for this. References are also made to a 'Public Transport Study Plan', in which the Council and Bus Eireann have been associated, but not the NTA.

It is not clear what the scope or precise purpose of these studies would be, how they would relate to the preceding N28 Study, or at what point the Council would be liaising with the NTA on this matter. An 'N28 Sustainable Travel Strategy' was undertaken by the Council in 2012, with the support of the NTA, the scope for which related to the N28 corridor as a whole, across a range of different modes, and included the Ringaskiddy and Carrigaline areas.

In regards to the above, on matters relating to the planning of public transport services for Carrigaline and the wider Cork Metropolitan Area, these would need to be undertaken in association with the NTA. As such, any objectives, or studies relating to public transport, included in the Carrigaline EA Local Area Plan, would need to refer to the NTA's function in this regard.

In regards to the provision in the Proposed Amendment for a Park and Ride facility (U-11), consideration of this can be undertaken as part of the NTA's review of public transport services in the Cork Metropolitan Area, as referenced above, to determine what potential role, park and ride would have, in Carrigaline, how it would relate to the public transport offer as whole.

Primary School

In section 1.4.40 of the Proposed Amendments, reference is made to the reservation of a site for a new primary school. In determining future school place requirements and the location of schools, this should be informed by an assessment of existing and anticipated future catchment areas and located on the basis of centrality with those catchment areas and accessibility by walking, cycling and public transport and the management of both school—generated and general traffic in the schools' environs which will result in minimising conflict with other modes.

The Authority would welcome the opportunity to work with the local authority in addressing the above concerns and recommendations.

Yours sincerely,

A handwritten signature in cursive script, appearing to read "Michael Mac Aree", is written over a horizontal line.

Michael Mac Aree
Head of Integrated Planning