

Case Reference LH04.322734
Planning Application 254551 – Cork County Council - Bridgewater Homes
Mountain Road Kilmoney Carrigaline Cork

To Whom It May Concern,

I wish to submit two observations on the above planning application please namely my personal opinion that there has been:

1. Inadequate consideration of traffic levels and
2. Cork County Council now appears to be in opposition to itself.

From the outset, can I firstly say I have no objection to neither housing nor the developer, everyone deserves a chance at renting/purchasing a home and we need developers to build them. My issue is the lack of joined-up thinking in infrastructure and planning alongside timing of housing development to build in a timely way that creates a sustainable town. Carrigaline is currently a traffic-congested town whose population deserves better.

Inadequate consideration of traffic levels

Carrigaline continues to have traffic problems with Carrs' Hill (N28) at a standstill at peak times. The N28 is the main artery to/from Carrigaline and has not been improved over the years despite huge numbers of houses being added to Carrigaline. A single car turning right into the Maxol service station can slow/block the entire traffic stream from the town. Further up on Carrs' Hill, the road narrows so a single cyclist can also slow/block traffic. The upgrade to the M28 motorway is a number of years away.

In the developer traffic and transportation assessment report, figure 6.1 projected growth rates, the traffic modelling refers to growth factors which appear to be too low. As an example, there is a car growth factor of 1.034 from 2024 to 2026. Assuming I am not interpreting incorrectly, the correct figure should be based on Cork County Councils figures from TPREP Page 8, *'95% of houses own 1 car and 50% own two cars with 10% more owning more than 2'*.

Based on the total number of units (362) multiplied by the above estimate from Cork County Councils own traffic numbers, this is a growth factor of c. 1.55.

We have a similar and more correct index number from the application. The developer has added 584 car spaces into the development and the Cork County Council Senior Planner has accepted this as adequate in granting conditional planning. There is tacit acknowledgment that this number of cars is expected in a development of this size. Therefore 584 car spaces for 362 units is a car per household number of 1.6. I would submit that all traffic junctions should therefore be revisited with that car index growth number if that level of car growth has not been used.

The application lists junctions 8 and 9 in the original diagram. These two junctions have been deemed in the application as not required to have a traffic and transport assessment. Based on the applicants estimated traffic growth, if the junctions growth is not at least 1.6 then a fuller traffic and transport assessment should be required.

The same applies to the Shannonpark roundabout. It is the only main route from Carrigaline outwards so the traffic from this development is going to move across it. It should also have been included in the models. The effects on that roundabout have not been included.

Per Cork County Development plan *"Capacity issues on the National Road network together with high levels of commuter-based travel in the town creates queuing at peak times at Shannonpark Roundabout"*.

I would also note that in the TRICS details Section 16 Ref 7.11.2, the average numbers, in the calculation factors, for the dwellings, flats and creche trips are 52, 25 and 56 respectively. Again, I am not trained on this system, but I would hope that those numbers reflect the 318, 44 and 102 units which are the actual numbers in the application for dwellings, flats and creche and that the models have been surveyed for the five working days of the week at least, in order to reflect working commuters and have been done so for the months of September to April as the other months do not reflect peak traffic with schools being on holidays.

The application does not consider (and perhaps it is not obliged to), other planning applications in a holistic manner which will also add more cars into the locality. A view should be provided of the output of a model showing the overall traffic effects of all new developments on the existing road network. The below are only a sample of the ones I know of.

- a. 362 units - this development which will have 561 cars (my estimate)
- b. 200 units - the site next to the Co-Op in Carrigaline centre which received planning
- c. 580 Units - between Carrigaline and Douglas from Murnane O' Shea ([Cork Beo](#))
- d. 108 units - apartments from Cairn Homes in Douglas ([O'Neill and Brennan](#))
- e. 472 units – Bayly, Douglas
- f. 70 units – Avondale soccer pitch site, Carrigaline, Fernhill Road

All of the above are going on to the same road to get to the city centre. The M28 is not yet operational, nor will it be for a number of years. Based on the County Councils own car per house index of 1.55 multiplied by the total units in the developments listed above) a total of 2,778 more cars will be on the local roads with no improvement in infrastructure until the M28 is operational.

According to the Department of Transport's recent report on costs of congestion in the regional cities [here](#), Page 19 notes:

while the expansion and improvement of road and sustainable transport infrastructure can temporarily alleviate congestion, demand will gradually increase in response to the increased supply. Provision of infrastructure alone, particularly roads, cannot have permanent and continuous effects to reduce congestion. Thus, demand management and further improvements in the sustainable modes will be needed.

The Department of Transport recognise more roads will not have permanent effects of reducing congestion. This application simply adds more cars.

With respect to the consultants, the suggested mitigation mobility plan is not going to help in any material way. The planners condition is that a report should be filed. I am unsure as to how doing this will reduce congestion.

Similarly, buses are not an option to get to city centre if they are stuck in traffic. If the traffic is alleviated and buses run on time and frequently, then that option opens up to commuters. So, the issue is and remains, the private car, which is the only most convenient option at the moment.

Per Cork County Council *"The buses therefore run quite frequently between Carrigaline and the locations it is connected to, however traffic congestion causes delays to services during peak periods leaving periods where there is no buses. This unreliability can result in residents turning to their car as the most reliable mode of transport for longer trips".*

There is reference in the mobility plan to alternative transport options, but residents could simply Google those, it does not contribute to reducing car travel materially. In the same way suggesting taxi discounts is not realistic. If that were a viable option, it would have been done a long time ago by Herons Wood, Janeville, Forest Hill etc. It simply won't happen. Ironically, that suggestion itself is also pointing towards the use of a car, which is the means of travel causing the congestion. Taxis' are not cheap; commuters will take their own car versus the cost of a taxi in my opinion.

Cork County Council now appears to be in opposition to itself.

Cork County Council team has spent time and resources in preparing and planning for the growth of Cork County over the next number of years. The [TPREP Report for Carrigaline](#) was prepared alongside the [Cork County Development Plan](#).

Cork County Council (planner) has granted conditional planning for this development but at the same time Cork County Council (TPREP / Development Plan Team) have made the following observations, with these comments appearing to be at odds with putting more cars into the already congested Carrigaline town.

- Per Cork County Council
 - *'Car ownership in Carrigaline is substantially higher than that of Cork City and Suburbs and other local towns within the vicinity. Almost half of the Carrigaline households have two cars and another 10% of the households have more than two cars. Only 5% of households have no car which is a very low number compared to any of the statistics of the other towns but especially Cork and Suburbs'.*
 - *Cork County Development Plan June 2022 "Carrigaline currently has one of the lowest jobs to resident workers ratio in the county and highlights the dormitory nature of the town. This gives rise to high dependency on car use as a high percentage of residents commute outside of the town for work".*
 - *Linkage to Cork (for Carrigaline) is restricted and dominated by car-based transport;*
 - *High car dependency for local trips;*
 - *Carrigaline has a 'current transportation infrastructure... already operates at or close to capacity and will struggle to accommodate more demand'*
 - *"The environment and attractiveness of towns like Carrigaline is at risk due to ongoing congestion and insufficient sustainable travel nodes".*
- Commercial traffic
 - *Per the Cork County Council development plan June 2022, it will be 2 years before a proposed outer relief road will even be assessed, let alone built. "Further detailed assessment of this route will be undertaken within two years of the adoption of the plan with the view to progressing this project"*
 - *HGV traffic do not have a choice but to move through the town centre of Carrigaline as no outer bypass routes are available*
 - *"a substantial number of delivery and light goods vehicles access into Carrigaline. Traffic counts have shown that between 50 and 70 delivery vehicles in each direction travels during the AM peak on Main Street and some sections almost 100 vehicles per direction"*

Recommendations:

1. School Buses – There is an annual solution. Traffic reduces considerably from May onwards, which is the local schools traffic reducing due to holidays. Perhaps the Mobility Plan could include the setting up of a school bus option for the development in conjunction with a private bus company or Bus Eireann. Getting kids to school requires multiple cars in a household. Having a safe means of getting the kids to school means less cars and less trips and more use of other travel.
2. The river and Ferry - Plans have been mooted a number of times for a ferry to the city centre from Crosshaven, perhaps the mobility plan can include active involvement in this plan which is currently being mooted by a private operator and the County Council could get involved? Is this a good case for government funds to encourage commuters?

Thank you,

Brian O' Donoghue.

