

22 Hillcrest,
Pembroke Wood,
Passage West,
Co. Cork.

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

8th November 2015.

RE: Proposed Amendments to the Carrigaline Electoral Area Local Area Plan – Shannonpark Framework Masterplan

Sir,

In respect of Proposed Amendment No. 4 to the Carrigaline Electoral Area Local Area Plan which is to give effect to the Shannonpark Framework Masterplan, I appreciate the opportunity to make the following observations:

- There is a significant housing need both nationally and in County Cork. I recognise that Cork County Council has earmarked these lands at Shannonpark for a significant housing development to respond to that need.
- It would be a grave injustice to the future Shannonpark community if the quality of standards of housing quality or environment were to be in any way compromised in an attempt to respond to the urgency of this housing need.
- Although Shannonpark is legitimately regarded as situate on the outskirts of Carrigaline, existing poor road infrastructure and resultant significant traffic congestion will in reality distance the Shannonpark community from Carrigaline town centre. It is recognised that the recommendations of the Carrigaline Area Traffic and Transportation Plan are to improve that infrastructure. However, again reality is that this plan was drafted eight years ago. The road network between Shannonpark and Carrigaline has seen little real improvement in that time, whilst the volume of traffic using it has significantly increased.

- Bearing this infrastructural deficit in mind, it is vital that the new community being planned for Shannonpark in this Framework Masterplan would incorporate a range of housing types: from bigger homes for larger families to small one-bedroom bungalows for the older resident. The proposed neighbourhood centre concept is also welcome with a view to minimising short car trips.
- However, despite welcoming the neighbourhood centre concept, this Framework Masterplan must not lose sight of the CASP Update 2008 aims for Carrigaline as outlined in the Carrigaline Electoral Area Local Area Plan. It clearly states that the focus for Carrigaline is consolidation of the town centre. The Framework Masterplan outlines an aim for 1,000 additional houses on the outskirts of Carrigaline town and does not contribute in any real way to this aim.
- It is also fair to observe that although Paragraph 1.2.1 of the Carrigaline Electoral Area Local Area Plan clearly states the target growth for population in 2020 for Carrigaline to be 14,066, the Census of Population indicates the population of Carrigaline to have been 14,924 in 2011. So according to the latest Census, the 2020 population target for Carrigaline was already exceeded four years ago.
- Whilst the fact that the population aims for Carrigaline appear to have already been exceeded does not negate the need for additional housing in Metropolitan Cork, it highlights the absolute urgency with which current infrastructural deficits in Carrigaline must be addressed. It is essential that the Framework Masterplan would include targeted proposals to improve infrastructural links between Shannonpark and Carrigaline town centre. The vague intentions of Paragraph 1.4.22 of the Proposed Amendment are by no means sufficient.
- I note Paragraph 1.4.18 of the Proposed Amendment states that the Transport Assessment on the Shannonpark lands identified that the provision of Phase 1a houses would not have a significant impact on prevailing traffic conditions. It would be good to know what the definition of “significant” in this context is. With a current westbound traffic queue of 99 vehicles at the Shannonpark roundabout and a queue of 17 vehicles southbound, it is difficult to appreciate how additional impact could be anything other than significant.
- The Cork County Development Plan 2014 has a clear aim of supporting the principal of independence for older people. Paragraph 5.7.6 advises that the particular needs of ageing people should be incorporated into the design, housing mix and location of new housing development. I would particularly like the Framework Masterplan to have a specific aim for a purpose-designed cluster of either sheltered housing or small, single storey dwellings for the elderly. The best location for such housing would be adjacent to the neighbourhood centre. There is a real deficit of sheltered housing for the elderly in County Cork. Shannonpark would be the ideal place to start providing for this increasingly pressing need in our society.
- The Framework Masterplan proposes four pedestrian links between the Masterplan lands and the adjacent Heronswood estate. Whilst I recognise that Cork County Council is attempting to increase permeability and thereby reduce the need for private car use, the on-the-ground reality is that this proposal will not work. We have repeated evidence that either permitted or accidental access between estates simply creates rat-runs for anti-social behaviour. Many estates in Cork City are attempting to

block off such access at significant financial cost. In the case of Shannonpark, planned linkages between the new estate and the existing Heronswood estate would simply serve to create a massive 2,000 house estate. Not merely would this facilitate anti-social behaviour, it would make parental control of smaller children very difficult. Furthermore, several of the pedestrian links suggested in the Framework Masterplan would run through front gardens of residences in Heronswood. I ask that the Framework Masterplan would exclude these four proposed pedestrian links. This would be reflective of the ethos of Paragraph 3.3.1 of the County Development Plan which recognises that the creation of sustainable communities extends beyond the physical environment to *“less tangible issues such as people’s perception of what constitutes an attractive and secure environment”*.

- The proposed continuation of the walkway/cycleway along the old railway line through the Masterplan lands and on through Heronswood is a policy that would want separate and careful consideration before statutory inclusion in the Masterplan. Is it fair to bring leisure cyclists and commuter cyclists through residential areas? Would this proposal increase burglaries in the residential areas by providing a quick get-away? Would this proposal increase anti-social behaviour linkages between residential areas? Such issues need serious thought. In principle, I very strongly support the continuation of the walkway/cycleway along the old railway line in all directions. However, none of our Greenway development to date has led users through existing residential housing estates.
- I am very disappointed with the limited scale of the transport interchange proposed in the Framework Masterplan. I am also very disappointed at the public’s inability to contribute its opinion to the possible scale of this transport interchange. Astra Construction indicated at its public information session on Friday last that Cork County Council has indicated it requires 50 car parking spaces to be provided with this phase of the transport interchange. This is very small. According to the last Census of Population, over 5,000 people travelling to school, work or college currently do so by private car. Fifty car parking spaces will provide no realistic alternative to the private car. In fact, 50 spaces is unlikely to be sufficient to even provide a realistic business opportunity to a private operator offering routes other than those offered by Bus Eireann. If the Framework Masterplan is going to advocate for a transport interchange, then let it be adequately large to give realistic indication of the feasibility of the longer-term larger facility planned for the western side of the R611.
- I have extreme concerns about the link road which the Framework Masterplan proposes should run east-west through the Masterplan lands.
 - The link road will serve not just residents of the new housing but also commuters heading for Ringaskiddy who wish to short-cut tailbacks on the Shannonpark roundabout. It will therefore be used as a link road serving the N28, at least until the N28 upgrade is in place. This would potentially result in large volumes of traffic travelling through a built up area at high speed.
 - This nature of road would segregate the overall estate into the future.
 - The proposed link road would endanger users of the open green areas adjoining and pedestrians wishing to cross it. Children living on the north side of the estate will want to cross to use the neighbourhood centre. No ramps or signalised crossing points are proposed in the Framework Masterplan.

Carriageway widths are relatively wide and no traffic calming details at all are specified in the Framework Masterplan.

- In speaking to Astra Construction at their public information evening, the architects indicated that County Council traffic calming for this link road is to comprise consideration of camber and a hedge between both carriageways. This will NOT work as a traffic calming measure. In fact, if a hedge is planted between the two carriageways it runs the risk of increasing rather than decreasing danger to crossing children.
- This link road should benefit the residents of the estate rather than serve as a relief road for others.
- This proposed road would link the R611 and the Fernhill Road. The Framework Masterplan acknowledges that the Fernhill Road needs upgrading. But in reality, Ballyhemiken Bridge on the Rock Road is listed on the National Inventory of Architectural Heritage as being of regional importance. It would be destroyed if it were to be widened and so it will never safely accommodate more than one lane of traffic. We need to be cognizant of how much traffic it is safe to deliberately lead onto the Fernhill Road because of the restriction at Ballyhemiken Bridge.
- I ask that the Framework Masterplan would require ramps for traffic calming throughout the proposed Shannonpark residential development.
- Two high voltage lines currently run through the Masterplan lands. Hundreds of international studies have proven that proximity to the electromagnetic fields from high voltage lines can interfere with sleep cycles, increase stress levels, damage your immune system and cause a range of cancers and other health problems:
 - Children living within 650 feet of power lines had a 70% greater risk for leukemia than children living 2,000 feet away or more.
(British Medical Journal, June 2005)
 - Several studies have identified occupational exposure to extremely low-frequency electromagnetic fields as a potential risk factor for neurodegenerative disease.
(Epidemiology, July 14 (4), 2003)
 - There is strong prospective evidence that prenatal maximum magnetic field exposure above a certain level may be associated with miscarriage risk.
(Epidemiology, Jan 13 (1), 2002)
 - In a study of 850 lymphoma, leukemia and related conditions, researchers from the University of Tasmania and Britain's Bristol University found that living for a prolonged period near high-voltage power lines increased the risk for these conditions later in life.
(Internal Medicine Journal, 2007)
 - Electromagnetic fields are responsible for an increase in childhood leukemia, adult brain cancer, Lou Gehrig's disease and miscarriage.
(California Department of Health, 2002)
- Paragraph 10.2.1 of the Strategic Environmental Assessment mentions the high voltage lines that run east to west across the Masterplan lands. But the Framework Masterplan does not mention their existence even once, nor the need to move them if the lands at Shannonpark are to be developed for residential purposes. This is despite the fact that Paragraph 1.4.11 of the Framework Masterplan specifically states

that the “results from the SEA process were fully considered and integrated into the preparation of the Masterplan”. Concerns about the high voltage lines were NOT included in the Framework Masterplan. The need to move these high voltage lines is absolutely essential for protection of human health and needs to be thus stated in the Framework Masterplan.

- At the Astra Construction public information evening, the proposed site layout drawings showed the lower of the two high voltage lines running roughly along the east-west link road, with the larger high voltage line relocated to run in the rough ground between the Masterplan lands and the M28. Yet at several points that larger high voltage line, even though relocated, runs along the back garden of houses in the north west corner of Phase 1 of the Masterplan. This is unacceptably close to these houses. Minimum distances for human health between the high voltage lines and residential homes need to be specified in the Framework Masterplan.
- House at the northern end of the Masterplan site would be those closest to the new M28. These will be susceptible to heavy traffic both visually and audially. It is essential that the Framework Masterplan would incorporate an aim towards mitigating against overlooking and traffic noise for people living in these houses.

Yours faithfully,

Marcia D’Alton
Independent Member, Cork County Council