

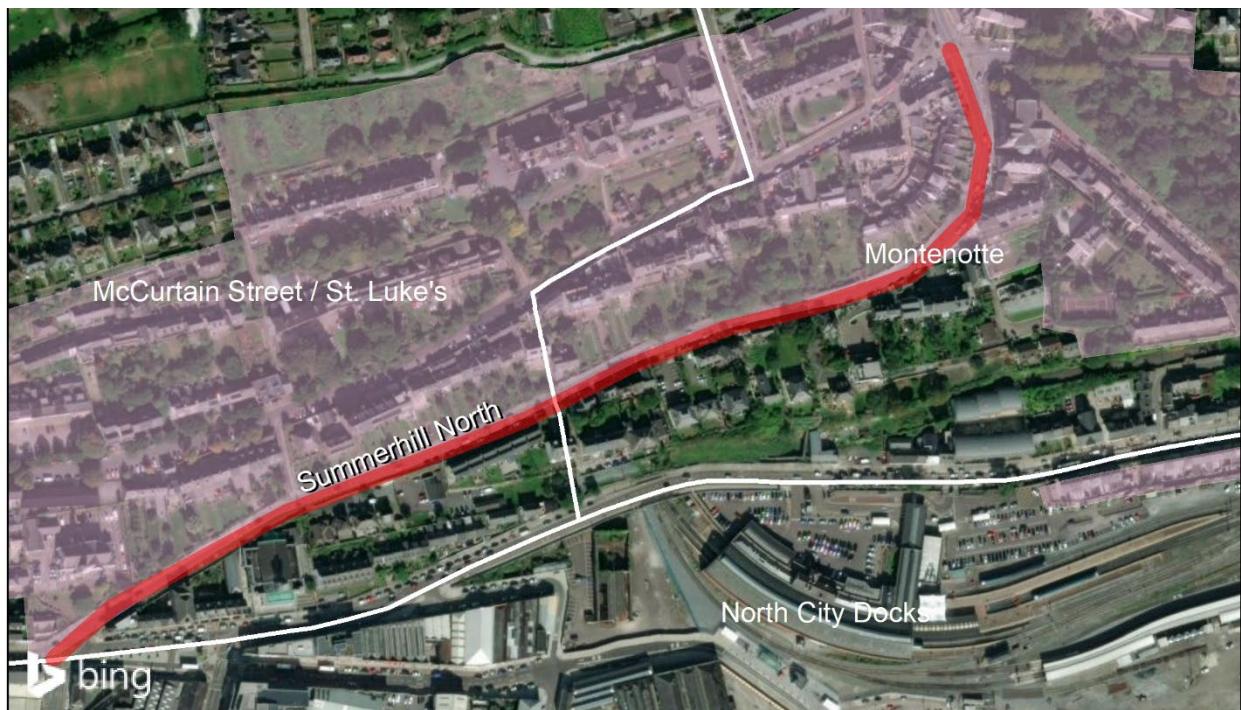
The Secretary
Planning Department
Cork City Council
City Hall
Anglesea Street
Cork
T12 T997

04 October 2021

Re: Submission to Draft Cork City Development Plan 2022 – 2028
Revised Design of Priority Bus Route at Summerhill North, St Lukes.

Dear Sir/ Madam

This submission has been prepared by a number of St. Luke's residents in response to Cork City Council's invitation for submissions to the Draft Cork City Development Plan 2022 -2028 (DCCDP). This submission is specifically in response to the Council's draft objectives in relation to Summerhill North which will form part of the Cork City Development Plan 2022-2028.



Legend

- Summerhill North
- City Neighbourhoods
- Architectural Conservation Areas

Figure 1 – Summerhill North Map

We have reviewed the DCCDP and welcome the recognition in the Core Strategy that St Luke's represents an excellent example of a 'Liveable, Walkable Neighbourhood' (ref Figure 2). As residents of St Luke's we are

acutely aware of the benefits of living in this urban village, with ready access to services and amenities, yet within walking distance to the city centre.



Figure 2 – based on Figure 2.11 of the DDP.

Our principal issues are that:

- the introduction of a priority bus lane will result in the development of a three-lane road in an Architectural Conservation Area and act as a barrier to connectivity and cohesion within our community;
- the removal of 80 – 100 on-street parking spaces on Summerhill North required to facilitate the development of a Bus Priority Lane will severely undermine the practicality of day-to-day living in the area, where the majority of the dwellings do not have access to off-street parking.

REQUEST:

We request that the Council revisit this proposal and avoid severing the community by introducing a more nuanced approach. We suggest that this could be achieved by making Summerhill North and Wellington Road both one-way. This would facilitate the inclusion of

¹ As proposed in the Cork Metropolitan Area Transport Plan

a bus lane while allowing the retention of resident parking and would not result in a significant increase in the carriageway width or traffic volume within the ACA. This would contribute towards the continued success of St Luke's as a sustainable community.

SUSTAINABLE COMMUNITY:

As a community we support the concept of sustainable travel. This is evident from the socio-economic profile of the area outlined in the Cork City Neighbourhood Profiles Document prepared by AIRO which underpins the DCCDP. Summerhill North straddles two neighbourhoods as delineated in the AIRO study: McCurtain Street / St. Luke's neighbourhood covers the southern end of Summerhill North with the northern portion falling within the Montenotte neighbourhood. As can be seen from Table 01, the commuting pattern in both neighbourhoods is significantly more sustainable than the city average.

Area	Travel to Work/Education by Green Modes	Travel to Work/Education by Public Transport	Travel to Work/Education by Private Transport
McCurtain Street / St. Luke's	42.2%	18.7%	25.7%
Montenotte	26.6%	12%	51.8%
City Overall	22.3%	9.1%	62.6%

Table 1 – Commuting Figures Extracted from Neighbourhood Profile Prepared by AIRO

However, while we support the concept of enhanced public transport, the current bus journey time from St Luke's to Parnell Place is 8 minutes while the walking time is 15 minutes. We as a community will not be the principal beneficiaries of the proposed priority bus lane, as it will not significantly reduce our travel times. However, in the proposed 'Zero-Sum Gain', scenario we will be the principal bearers of the burden in terms of having our historic and sensitive neighbourhood severed by a three-lane road and no longer being able to have access to a car.



Figure 3 – based on page 65 of CMATS

We consider that Figure 3, extracted from CMATS is misleading as the volume of traffic indicated does not reflect the realistic volume of traffic that travels along Summerhill. Furthermore, we consider that the recent

permission for 753 no. residential units at Laherdane and Ballincolly in Ballyvolane (ABP 306325) will significantly exacerbate the situation.

The traffic speeds on Summerhill already act as a constraint on community cohesion, with pedestrians already encountering significant difficulty when trying to cross the road due to the volume and speed of the traffic. This is a crucial issue for the primary school children walking to St Luke's National School and St Patricks National School and the clients of the Cope Foundation. The severity of the impact from the existing traffic is evident from the EPA Noise Maps (Figure 3) which show that a daytime noise level of 70 – 74 dB L_{den} is experience along Summerhill North while 60 dB L_{den} is the current design goal for all national roads as set out in the Good Practice Guidelines for Treatment of Noise during the Planning of National Road Schemes, March 2014, NRA.

While we recognize that the objective behind a priority bus lane is to encourage modal shift away from private cars, and reduce carbon emissions we consider that the introduction of a third vehicular lane in this residential area will exacerbate the existing problematic situation for the residents. In view of the EPA Noise Data we consider that it is beholden on the Council to reduce the existing traffic volumes on Summerhill North rather than introducing a third lane of traffic, increasing the difficulty for pedestrians to cross the road and resulting in an increase in traffic from buses, taxi and the unauthorised use of the third lane by cars.

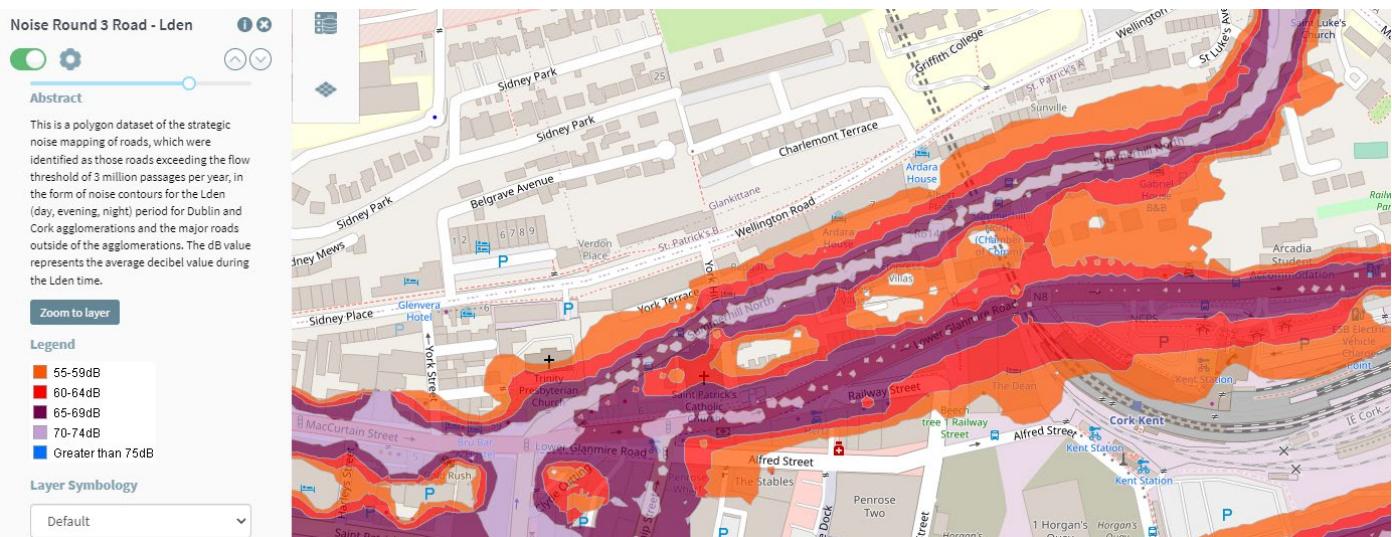


Figure 3 - Day Time Road Noise in Summerhill North – EPA Maps

We note Section 2.29 of the DCCDP which states that '*understanding the nature and context of an existing neighbourhood, town or community is the starting point for good planning and design*'. However, we consider that the plan does not appear to understand the St Luke's area and we do not accept that the proposals are good planning and design. The plan extols the areas virtues as a '*Liveable, Walkable Neighbourhood*' and proceeds to introduce policies which undermine both characteristics.

In this context we ask the Council to note the article '*Community Severance and Health: What Do We Actually Know?*' by Mindell, J. and Karlsen, S., 2012 which found an inverse relationship between traffic and social contacts. It sets out that there is empirical evidence that traffic speed and volume reduce physical activity, social contacts, children's play, and access to goods and services. It notes that major roads reduce the number of journeys being taken on foot due to their impact on the nature of the journey itself and the local environment. Studies indicate that the addition of each lane of traffic increases community severance, with 3 lanes acknowledged to act as a significant barrier.

The DCCDP notes that the '*delivery of an efficient and reliable bus system is contingent on prioritising bus services above general traffic. The proposed increase in bus services and vehicle numbers will benefit a significant proportion of the City's population*'. However, as previously noted, the St Luke's community are not amongst those who will benefit. Therefore, we suggest a 'Non Zero Sum Gain' approach should be adopted, where benefits of the wider community are not necessarily balanced by losses to the St. Luke's community, but where a more thoughtful approach is adopted whereby all parties can benefit.

ARCHITECTURAL CONSERVATION AREA

We welcome the extension of the Wellington Road /St. Lukes Architectural Conservation Area (ACA) in the draft plan. However, Volume 3 - Built Heritage of the DCCDP notes that one of the most significant challenges facing the Wellington Road /St. Luke's ACA is:

Car parking for users of local services and residents is at odds with the parking by city centre commuters who park in the area and walk into the city centre.

We consider the Council's policies for St Luke's are contradictory. On the one hand they are recognising the significant and special character of the area and on the other they are proposing to sever the area with a major transportation route. They acknowledge that commuter parking is putting pressure on local residents and address this by proposing to remove all residents parking.

Section 8.32 of the DCCDP notes that the Council seeks to '*preserve and enhance the special character of areas*' by the ACA designation. Section 8.34 states that they Council will seek to '*protect the exiting qualities as part of the evolving development process and to ensure that new development responds to the historic environment in a way that contributes new values from our own time*'. We consider Section 8.36 of particular relevance in that:

New development in Architectural Conservation Areas should have regard to existing patterns of development, the city's characteristic architectural forms...

These aspirations are combined in Strategic Objective 7 which sets out to:

To protect and reinforce the unique character and built fabric of the city, towns, villages, suburbs, neighbourhoods and places that make up the fabric of Cork City, both the character derived from the natural environment and the man-made character created by the built form.

It goes on to state that:

Proposals for new development must have regard to the historic built heritage of the City, particularly Protected Structures, archaeological monuments and heritage and Architectural Conservation Areas, and any development that has a detrimental impact on these assets will not normally be acceptable.

We consider the three-lane road proposals will have a detrimental impact on an ACA and should not therefore be considered acceptable.

ON-STREET PARKING

St Luke's is an area that has undergone significant change since the 1970s and 1980s when the area was experiencing considerable deprivation and historic buildings were not in fashion for residential use. It is an unusual area within the city with an extensive stock of historic buildings which give the area its character, but which also still have constraints associated with them in terms of modern residential norms. One such constraint is the lack of off-street parking which is a given in most residential areas of the city. In this context, the replacement of the entire on-street parking offer in the area with a priority bus lane has significantly greater repercussions in this area than in other suburban areas where similar transport initiatives are being proposed.

Currently, on-street parking is available on the southern side of Summerhill North, from south of Empress Villas up to St Lukes Church, c. 500m (ref Figure 4). The majority of the houses on the southern side of the road do not have off-street parking. The same applies to houses on the northern side of the road from no. 66 upwards. Due to the size of the buildings many houses in this area have historically been converted into multiple apartments. This leads to an increase in parking space demand in the area. Assuming the average parking space is 4.8m long the c. 500m currently available equates to c. 80 - 100 parking spaces.

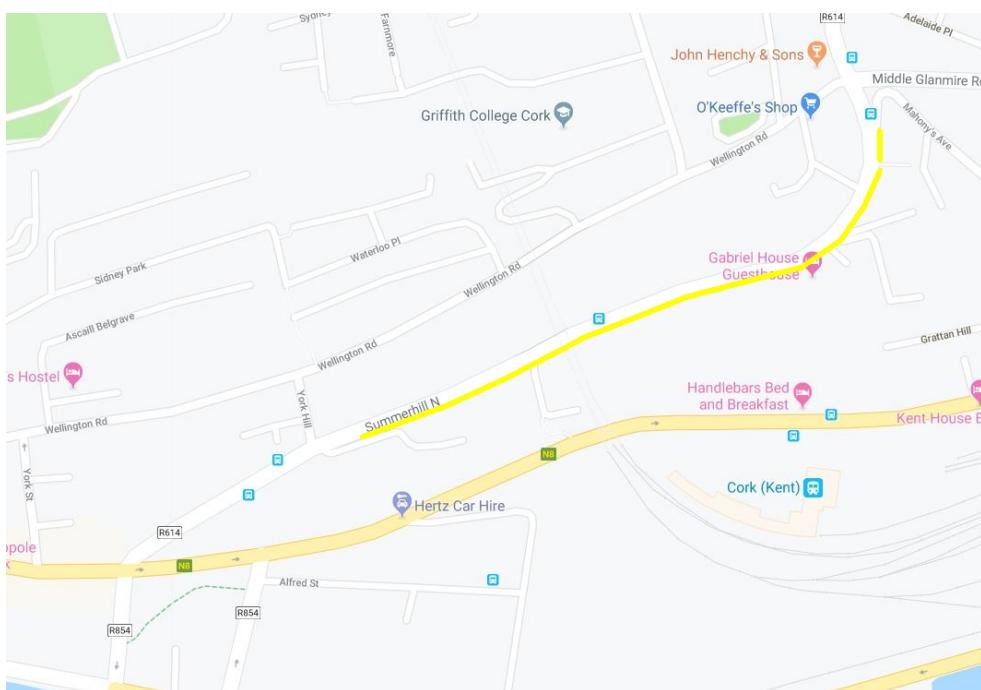


Figure 4 - Yellow Line indicates Current On-Street Parking on Summerhill North

The Re-design of the road layout in St Luke's Cross led to a significant reduction in parking provision for the area. More recently, the conversion of St Luke's Church into a music venue has put increased pressure on the scarce parking resources. This is further compounded by the area's proximity to the City Centre, with commuters parking in the area and walking to work. We believe that should the c.80 - 100 on-street parking spaces be removed without being accommodated elsewhere it would put significant pressure on the lives of the residents, many of whom are elderly due to the settled nature of the area. There is not sufficient capacity in the on-street parking provision on Wellington Road to absorb even a fraction of these displaced cars.

While we acknowledge that a priority bus route and modal shift to sustainable travel modes are laudable objectives, we consider this must be achieved in a manner than does not compromise the quality of life of the

local resident. While reduced and even zero-car parking provision can be acceptable for new residential developments where the future residents can make a choice to accept these conditions, we do not think it is acceptable to enforce zero-parking provision on a long-established, mature community where the number of retired families is significantly above the city average.

While the travel patterns of the residents are amongst the most sustainable in the city, it is reasonable that the residents should be in a position to have access to private transport. We fear this proposal, which is undoubtedly well intentioned, if not properly considered could lead to serious hardship for the residents of Summerhill North and ultimately, it could potentially undermine the positive developments that the community has worked hard to bring about in the area over the last twenty years. In this context we would like to remind the Council of another previous, well intention, but we would contend equally misguided proposal for the area in the form of the BKS 1960s Transport Plan involving a freeway on stilts along Wellington Road (ref Figure 5)

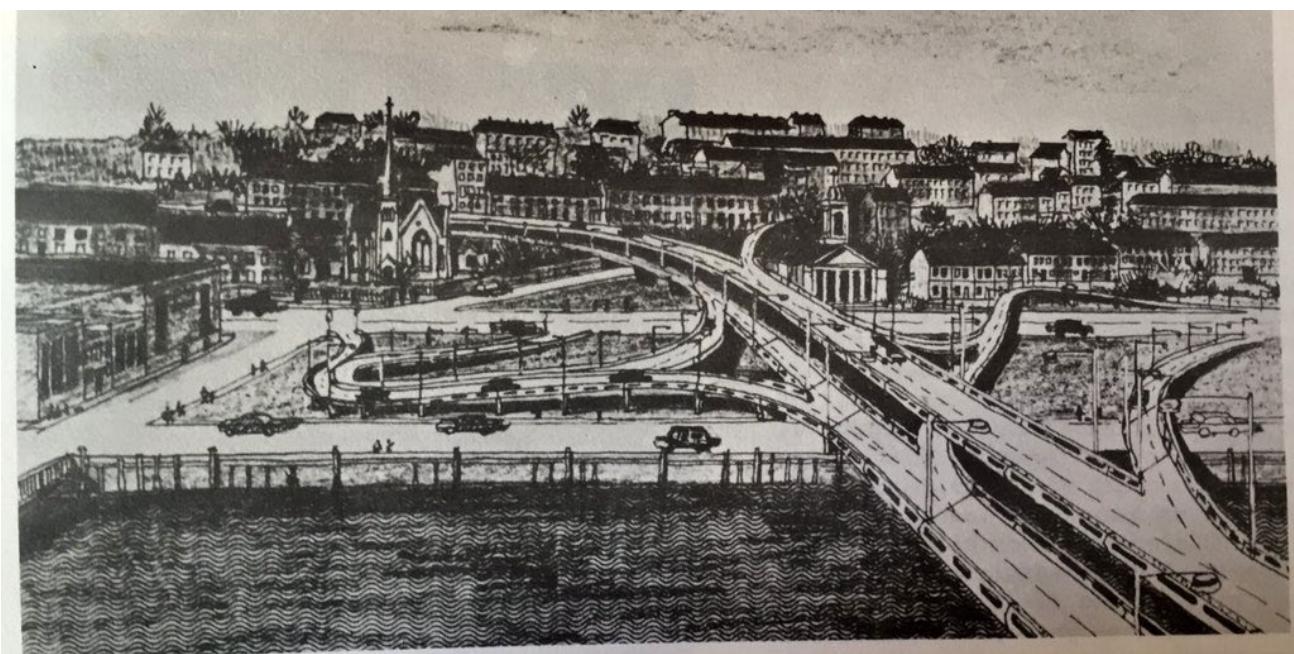


Figure 5 – BKS 1960s Freeway Proposal Cork City

We ask therefore that the Council take the needs of the residents and the character of the ACA into account when considering this issue in relation to the Cork City Development Plan 2022-2028 and ensure that any proposal is not detrimental to both. Please do not hesitate to contact us if you have any queries.

Yours sincerely

Nuala & Sean Fenton (1 Harbour View Terrace, Summerhill North)

Hugh & Deirdre Lorigan (74 Summerhill North)

Susan & John Waterstone (The Rectory, Mahony's Avenue)

Fergus Lalor (3 Harbour View Terrace, Summerhill North)

Brigid Mc Loughlin Butler (3-4 Summerhill North)

Karla Butler (3-4 Summerhill North)

Valerie Kent & Shane O'Neill (3 Harbour View Terrace, Summerhill North)