

Owen Shinkwin

From: Michael MacAree
Sent: 23 January 2014 10:39
To: Owen Shinkwin
Subject: Accepted: mahon LAP

Tá eolas sa teachtaireacht leictreonach seo a d'fhéadfadh bheith príobháideach nó faoi rún agus b'fhéidir go mbeadh ábhar rúnda nó pribhléideach ann. Is le h-aghaidh an duine/na ndaoine nó le h-aghaidh an aonáin atá ainmnithe thuas agus le haghaidh an duine/na ndaoine sin amháin atá an t-eolas. Tá cosc ar rochtain don teachtaireacht leictreonach seo do aon duine eile. Murab ionann tusa agus an té a bhfuil an teachtaireacht ceaptha dó bíodh a fhios agat nach gceadaítear nochtadh, cóipeáil, scaipeadh nó úsáid an eolais agus/nó an chomhaid seo agus b'fhéidir d'fhéadfadh bheith mídhleathach.

The information in this email is confidential and may be legally privileged. It is intended solely for the addressee. Access to this email by anyone else is unauthorised. If you are not the intended recipient, any disclosure, copying, distribution or any action taken or omitted to be taken in reliance on it is prohibited and may be unlawful.

Owen Shinkwin

From: Hugh Creegan
Sent: 21 January 2014 18:11
To: Michael MacAree; Owen Shinkwin
Subject: FW: Mahon Jacobs Island
Attachments: mahon amendments.pdf; mahon variation.pdf

From: Tara Spain [<mailto:tspain@nra.ie>]
Sent: 21 January 2014 10:35
To: Hugh Creegan
Subject: Mahon Jacobs Island

Hugh

Good Morning

There is a significant issue arising in Cork City. The members have endorsed a variation/amendment to add 15,000sqm of office space to Jacobs Island South of the Mahon Interchange as well as bumping up the retail quota.

I have been working with Owen Shinkwin on the issues but I would highlight that it is a very unsustainable approach both to transport and land use planning in the City and could undermine any benefits both Authorities are undertaking in Cork.

Although the responses attached are very long, the key issues are as follows:

- Access to the Jacobs Island area is highly reliant on the Mahon Junction and N40.
- There is limited availability of public transport to the subject site to offset the significant reliance on private car borne trips which will be generated.
- The challenges in delivering a walking and cycling environment in the vicinity of the interchange, which delivers a competitive advantage to walking and cycling for local trip making to areas, north of the interchange;
- The proposed land uses are dependent upon a car borne catchment utilising the N40.
- There is already a significant supply of land with an employment zoning objective within Mahon capable of accommodating employment in excess of the employment targets for Mahon to 2031.
- A quantum scale of retail / commercial development has been previously assessed and refused by Bord Pleanála (PI 28.232675).
- Outstanding permission exists for commercial development including 1200sqm of retail space (PL28.232275) (please note not just convenience).
- There is also provision within a 5 minute drive time from existing established stores which unlike the proposal at Jacobs Island do not draw traffic through the N40 or Mahon Junction. There are more suitable sites for such retail development already within the proposed plan area (Avenue De Rennes).
- In general, the need to consolidate future development in areas which can provide the greatest support for higher levels of public transport service in Mahon and around the district centre core.

Finally, the City Council are also proposing a transport model to manage development quota. Although we have considerable reservation about the current modelling this provides an opportunity to "get it right". It is therefore important that a formal agreement needs to be reached between relevant transport authorities on the assumptions which form the basis, testing and management for the proposed development management

model as early as possible prior to the lodgement of any planning application to avoid any future conflicts and facilitate better management.

I would be grateful for your support on the above issues which I have also raised with the DOE.

Regards

Tara

Tara Spain
Senior Policy Advisor (Planning)
National Roads Authority
St. Martins House
Waterloo Road
Dublin 4
Direct Dial 0035316658849

NRA E-mail system: This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager.

I'm supporting The Gathering Ireland 2013. Go to www.thegatheringireland.com and Be Part of it!

--
This email was virus checked by Edge\Guard. Managed by Trilogy Technologies.

Pat Ledwidge
Director of Services
Planning & Development Directorate
City Hall
Cork City

Teach Naomh Máirtín / Bóthar Waterloo / Baile Átha Cliath 4
St. Martin's House / Waterloo Road / Dublin 4
Teil: / Tel: + 353 1 660 2511 Facs: / Fax: + 353 1 668 0009

Dáta | Date

20 January 2014

Ár dTag. | Our Ref.

NRA Ref: 14-89281

Bhur dTag. | Your Ref.

Re: Amendments to Draft Mahon Local Area Plan 2013

Dear Mr. Ledwidge,

Firstly the Authority wishes to acknowledge the significant commitment by the planning authority to obtaining modal shift and public transportation as demonstrated by elements of the Draft Mahon Local Area Plan, the existing City Development Plan and active CASP involvement.

As the Council is aware, the N40 Cork South Ring Road provides a southern bypass of Cork City and is vital to the movement of strategic traffic around the Cork Metropolitan area. Delays and congestion on this corridor have an immediate wide impact across the city. Traffic problems on the N40 are due largely to the high demands through the Jack Lynch Tunnel and the turning movements, particularly the heavy flows between the N40 East and the Tunnel and the M8/N8 and the Tunnel. The Mahon Interchange is the first junction to the south of the Jack Lynch Tunnel and so it forms an important access into the city for traffic from East Cork and traffic from the N28 (i.e. Carrigaline/Ringaskiddy). The Interchange currently experiences significant traffic queuing on its gyratory and approaches to the signals at peak times especially at weekend peaks. This in turn leads to further traffic congestion on the Mahon Interchange access ramps and queuing on the N40 mainline.

Therefore in accordance with the DOECLG's Spatial Planning and National Roads Guidelines for Planning Guidelines (2012), there is a critical need to assess, mitigate and plan for the interface between potential development proposals and the national road network. Within this context, the Authority submits the following observations on the South Mahon Local Area Plan for consideration by the Council:

1. CLARIFICATION OF CONSULTATION

The Authority notes Alteration no. 26, S3.4.2 and wishes to advise that although we acknowledge that consultation occurred during the drafting of the plan, issues raised by the NRA were not addressed in full which is clear from our previous submissions and also repeated in written correspondence during the preparation the Draft Local Area Plan.

2. INCREASED CONNECTIVITY

Table 1		
No.	Proposed Alteration	LAP Page no.
66	(insert new paragraph) The City Council will consider the feasibility of providing a vehicular link directly from the shopping centre onto the Mahon Interchange slip road to see whether it is desirable from an engineering, traffic and policy grounds.	85

In relation to Alteration no. 66 detailed above the Authority would refer the City Council to Section 2.7 Development at National Road Interchanges or Junctions of Spatial Planning and National Roads Guidelines for Planning Authorities (DOELG 2012). The Authority advises that it would not be supportive of additional junction/enhancements at this location. The NRA's has already expressed concerns with regard to similar enhancements/junctions in proximity to the Mahon Interchange relating to traffic capacity, safety and national roads policy.

The Authority recommends that issues with regard to capacity of the existing junction would be best dealt with by the continued engagement of the City Council in the NRA Demand Management Study for the N40.

3. DEVELOPMENT STRATEGY IMPLEMENTATION

Table 2			
No.	Proposed Alteration	LAP no.	Page
61 abridged	Land use Strategy Zoning objective definitions are set out in the current <i>Cork City Development Plan</i> . Mahon Point Shopping Centre The development of Mahon Point Shopping Centre is subject to constraints set out in the <i>Cork Strategic Retail Study</i> , as incorporated in the current development plan. The further development of the area to the north of the shopping centre will..... therefore be driven by non-retail uses. The future of this area is most likely to include a mix of residential, local services uses (e.g. commercial leisure and retail services) and public open space to meet the needs of the shopping centre and the wider sub-area and in compliance with development plan open space standards. A detailed strategy for the development of this area will be developed in partnership with the developer through the development management system.	83	

With relation to the highlighted statement above in Alteration no. 61, the Authority would refer the planning authority to Chapter 2 of the DOEHLG's Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities which state that '*Non-statutory framework plans and site development briefs can supplement but not replace the function of statutory plans*'.

Given the sensitivity of the area to further development as indicated throughout the Draft Local Area Plan and its amendments, the Authority considers it essential that the proposed development strategy should be referred to relevant stakeholders for consultation and agreement prior to the receipt of any planning application especially as regards to impact on transportation issues (in the NRA's case the N40) and the range of development which will be permitted in this area. This could potentially avoid any conflicting issues arising as planning applications occur.

4. STRATEGIC TRANSPORT IMPACT

The Authority is aware that the City Council disagrees with the NRA with respect to impact of increased residential and economic development quanta in Tranche 1 compared to that already proposed in the Mahon Strategic Transportation and Traffic Assessment (Mahon STTA), 2012.

The Authority remains of this opinion and would highlight that this quanta has been further increased by the addition of additional non residential floorspace in Jacobs Island (amendment no.6, 13, 14, 19 and 64 refer)

Table no.3		
No.	Proposed Alteration	LAP Page no.
13	<p>3.2.1 LAP Employment Target (pp23-25)</p> <p>The employment target for 2011-2021 set out in Table 3.2 (below) reflects the level of employment that has already been committed in Mahon. Equivalent indicative floorspace targets are also included in Table 3.2 based upon an employment density of one worker per 15 gross square metres (gsm). This is indicative and based upon a local assessment of employment densities. In the UK and Ireland office market employment densities have steadily increased and are currently on average 1 person per 12 gross square metres according to the <i>Employment Densities Guide</i> (DJD, 2010). Whilst it is difficult to keep an exact employment figure for the Mahon area (or any area) the City Council will monitor trends as far as it can with the resources that it has available to get an up-to-date figure for use in assessing new development proposals in the Development Management process.</p> <p>The <i>Mahon Strategic Transportation and Traffic Assessment</i> 2012 shows that the transport capacity of the Mahon area, based upon a wide range of assumptions, is for 7,400 jobs over 2006 levels. Existing planning permission commitments exceed this maximum transport capacity by 350 600 jobs.</p> <p>Figure 3.0 (below) identifies the major sites with employment and residential planning commitments (current and expired).</p>	24

14	3.2.3: Breakdown of Targets The overall targets for the plan area are broken down into indicative yields for each sub-area in Table 3.4 Table 3.3a: Indicative breakdown of targets Sub-Area SA9: JI Tranche 2 EMPLOYMENT (jobs) 500-1,000 TOTAL FOR LAP EMPLOYMENT (jobs) 3,000*	After 25
32	Development Management and traffic impact The future assessment of development proposals and their transport and traffic impact will be critical to understanding the cumulative impact of trip generation on the transport system on the local network of streets, the N40 and the Mahon Interchange. The City Council needs to be sure that all traffic modelling accurately reflects the cumulative impact of existing development and development benefitting from planning permission, and therefore it will require all development proposals to be assessed using the Mahon Saturn traffic model developed for the purposes of the <i>Mahon Transport and Traffic Assessment 2012</i> , subject to any agreed updates to modelling assumptions. There may also be requirements for the supplementary modelling of junctions using complementary traffic modelling software. The 2012 assessment demonstrated that there is very limited capacity for net increases in employment levels over that committed by the major planning permissions on the former MA/COM and Motorola sites. (Insert new sub-section above Objective T03: Minimising Impact of Vehicles	39

Having reviewed the City Managers Report on submissions and associated amendments and Mahon STTA, the Authority remains of the view that sufficient information has not been presented to allow an adequate assessment of the impacts of the proposed land uses. This is further aggravated by the inclusion of alterations no. 13 and 14 indicted in the table above. Alteration 14 proposes an increase in non-residential land uses while alteration 13 proposes an unclear methodology of monitoring via the development management process which appears to be supplemented by Alteration 32.

As already highlighted, during peak times, long queues and delays occur at the N40 Interchange at Mahon. Any additional traffic may have a negative impact on the carrying capacity and safety of the junction. In light of this, it is clear that there is a significant risk that the development quanta proposed will lead to further congestion on the road network which could have significant consequences for the operation and efficiency of the N40, and the Mahon Interchange. As included in alterations no. 13 and 32, there are existing transport capacity issues. The Authority therefore considers that the proposed amendments are not in accordance with the requirements of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012).

The Authority strongly recommends that the following key concerns need to be addressed prior to the final adoption of the plan:

1. The Mahon Interchange can block back to the N40 mainline, which significantly reduces the level of service to traffic travelling on the N40. As a consequence, it is important that any proposals to intensify land uses in this area are carefully considered and analysis of the N40 junction at Mahon is undertaken.

The land use proposals outlined in the Mahon STTA, the Draft Mahon LAP plan, and its associated amendments demonstrate a significant increase in both residential and employment development quanta.

The Draft Mahon LAP and these subsequent amendments propose increased development quanta in Tranche 1 (including additional economic development in Jacobs's island) compared to that proposed in the Mahon STTA, and an associated intensification of use at the Mahon Interchange and N40 mainline. Therefore, the Authority recommends that the STTA must be revisited and revised to assess the impact of these changes and include an assessment of the N40 Interchange at Mahon as had been previously requested and not as part of a development management monitoring process as proposed in Alterations no. 13 and 32.

2. The land use proposals outlined in the Draft Mahon LAP, and associated increases in the amendments, propose a significant increase in both residential and employment development. This is supplemented by the statements included in the Mahon LAP that there are transport capacity concerns (alteration 13 & 32)

Detailed information of the proposed trip rates have not been presented in the documents presented for review. In the absence of these, the Authority's calculations indicate a greater than 71% increase in vehicle trips may be anticipated over the lifetime of the plan. This issue needs to be examined and clarified accordingly as early as possible and not predominantly through the development management process as proposed by alteration nos. 13 and 32.

3. Insufficient information has been provided to demonstrate how the local area trips will distribute traffic through the network. More detailed assessments of the traffic distribution are necessary including details of all assumptions and methods used in assigning trips to the network.
4. The traffic assessment in the Mahon STTA is dependent on a vehicular modal split target of 55% in Tranche 1, and 45% in Tranche 2 being achieved. However, sensitivity tests need to be undertaken using a higher vehicular modal split, in order to examine the traffic impact on the N40 interchange should modal split targets not be achieved.
5. Given the ambitious vehicle modal split targets of 55% in Tranche 1, and 45% in Tranche 2, more detailed information should be provided regarding the program for delivery of the proposed public transport infrastructure. Further clarity is needed on agreements with operators, public transport journey times, and expected level of service, public transport capacity, and bus headways would assist in understanding whether the modal split targets will be achieved and/or are achievable.

The Authority remains of the opinion that the Draft Mahon LAP and the Mahon STTA reports have not presented traffic analysis of the N40 Mahon Interchange and mainline associated with proposed development quanta.

An assessment needs to be undertaken on the impact on the N40 infrastructure, with the results of this traffic modelling provided. This is a critical concern given the increase in proposed development quanta. Assumptions made in the traffic modelling analysis including, the trip generation, trip assignment/distribution, and the sensitivity tests, should and need to be provided. Furthermore, traffic modelling should be undertaken for a weekend peak as highlighted as an issue in alteration no. 15. In this way, it can be concluded what the impact of the land use proposals will be, and also identify the level and form of mitigation required.

The inclusion of alteration no. 32 is welcomed to a limited extent but does not address the element of the stated quanta proposed by the LAP. The Authority continues to strongly advise that a revised assessment needs to be undertaken and presented to fully assess the potential impact of the intensification and programming of land use proposals in this area which should not be left to incremental implementation through development management.

The Authority recommends that if this objective remains, that a formal agreement needs to be reached between relevant transport authorities on the assumptions which form the basis, testing and management of this proposed development management model as early as possible prior to the lodgement of any planning application. This process should be clearly outlined and included in the text of the adopted local area plan.

4. JACOBS ISLAND

The Authority has serious concerns in relation to significant further non-residential development occurring to the south of the N40 interchange as proposed by the alterations listed in the table below.

Table no.4 Proposed Alterations to Draft Mahon Local Area 2013		
No.	Proposed Alteration	LAP Page no.
3	Table 1.3 Jacob's Island Centre Replace "Indicative Location for Local Centre" with "Indicative Location for Neighbourhood Centre" symbol.	5
6	Table 2.2: Potential to Accommodate New Residential + Employment Development SA9 Jacob's Island Yes (neighbourhood centre related and limited business and technology employment)	9
13	3.2.1 LAP Employment Target (pp23-25) The employment target for 2011-2021 set out in Table 3.2 (below) reflects the level of employment that has already been committed in Mahon. Equivalent indicative floorspace targets are also included in Table 3.2 based upon an employment density of one worker per 15 gross square metres (gsm). This is indicative and based upon a local assessment of employment densities. In the UK and Ireland office market employment densities have steadily increased and are currently on average 1 person per 12 gross square metres according to the <i>Employment Densities Guide</i> (DJD, 2010). Whilst it is difficult to keep an	24

	<p>exact employment figure for the Mahon area (or any area) the City Council will monitor trends as far as it can with the resources that it has available to get an up-to-date figure for use in assessing new development proposals in the Development Management process.</p> <p><i>The Mahon Strategic Transportation and Traffic Assessment 2012 shows that the transport capacity of the Mahon area, based upon a wide range of assumptions, is for 7,400 jobs over 2006 levels. Existing planning permission commitments exceed this maximum transport capacity by 350 600 jobs. Figure 3.0 (below) identifies the major sites with employment and residential planning commitments (current and expired).</i></p>																							
14	<p>3.2.3: Breakdown of Targets</p> <p>The overall targets for the plan area are broken down into indicative yields for each sub-area in Table 3.4</p> <p>Table 3.3a: Indicative breakdown of targets</p> <p>Sub-Area SA9: JI</p> <p>Tranche 2 EMPLOYMENT (jobs) 500-1,000</p> <p>TOTAL FOR LAP EMPLOYMENT (jobs) 3,000*</p>	After 25																						
19	<p>Table 3.4: Mahon: Scope for retail and local services development</p> <p>Neighbourhood Centres</p> <p>Jacob's Island A new neighbourhood centre on Jacob's Island of a scale to serve the needs of the residential population. The current development plan provides for an upgrading of the Local Centre to a Neighbourhood Centre. Currently 1200gsm 1900gsm is committed, of which 300sqm is pure convenience retail.</p>	31																						
64 abridged	<table><tr><td colspan="2">4.10: Sub-Area 9: Jacob's Island</td></tr><tr><td colspan="2"><u>Jacobs Island Sub-area data</u></td></tr><tr><td>Residential Development</td><td></td></tr><tr><td><i>Existing residential units</i></td><td>331</td></tr><tr><td><i>Gross floor area as a % of total</i></td><td>95% minimum</td></tr><tr><td><i>Residential yield [dwellings per hectare]</i></td><td>40-35-90dph (medium – medium-high density)</td></tr><tr><td><i>Indicative new units</i></td><td>250-635- target 410 units 250-635 (503 committed) target 450 units</td></tr><tr><td><i>Indicative additional population</i></td><td>600-1530 – target 964</td></tr><tr><td>Non-residential development</td><td></td></tr><tr><td><i>Gross floor area (as a % of total)</i></td><td>5% maximum</td></tr><tr><td><i>Non-residential type</i></td><td>Neighbourhood Centre and ancillary local services and up to 15,000gsm business and technology employment uses.</td></tr></table>	4.10: Sub-Area 9: Jacob's Island		<u>Jacobs Island Sub-area data</u>		Residential Development		<i>Existing residential units</i>	331	<i>Gross floor area as a % of total</i>	95% minimum	<i>Residential yield [dwellings per hectare]</i>	40-35-90dph (medium – medium-high density)	<i>Indicative new units</i>	250-635- target 410 units 250-635 (503 committed) target 450 units	<i>Indicative additional population</i>	600-1530 – target 964	Non-residential development		<i>Gross floor area (as a % of total)</i>	5% maximum	<i>Non-residential type</i>	Neighbourhood Centre and ancillary local services and up to 15,000gsm business and technology employment uses.	87-89
4.10: Sub-Area 9: Jacob's Island																								
<u>Jacobs Island Sub-area data</u>																								
Residential Development																								
<i>Existing residential units</i>	331																							
<i>Gross floor area as a % of total</i>	95% minimum																							
<i>Residential yield [dwellings per hectare]</i>	40-35-90dph (medium – medium-high density)																							
<i>Indicative new units</i>	250-635- target 410 units 250-635 (503 committed) target 450 units																							
<i>Indicative additional population</i>	600-1530 – target 964																							
Non-residential development																								
<i>Gross floor area (as a % of total)</i>	5% maximum																							
<i>Non-residential type</i>	Neighbourhood Centre and ancillary local services and up to 15,000gsm business and technology employment uses.																							

	Neighbourhood Centre	4900 1200 gsm local centre committed (convenience and local services) plus appropriate enlargement and additional neighbourhood centre scale shopping	
	Community facilities	Childcare facilities	
	<p>*****</p> <p>An existing planning permission for a local centre of 1900gsm 1,200gsm has been granted to provide for the local commercial services needs of the area. Any additional neighbourhood centre development must complement the existing commitment and must also front onto the spine road. Limited Business and Technology Uses will be open for consideration on Jacob's Island up to a maximum of 15,000 gross square metres on land benefitting from a "Residential, Local Services and Institutions" land use zoning objective. The provision of this proposed use is subject to appropriate transport and traffic capacity assessment and appropriate consideration of residential amenity.</p>		
Fig 4.10	Map Objective NC		

Those concerns can be summarised as follows:

Jacob's Island is a residential development area physically separated from Mahon by the N40 Mahon Interchange. Due to this physical separation there are very real transport impediments to providing sustainable transport solutions to development on Jacob's Island and therefore resultant local trips would be loaded onto the national road interchange. The Authority's understanding was that the City Development Plan and also the ethos of the Mahon Local Area Plan was that the appropriate land use strategy for Jacob's Island was for residential use with local services only.

The Authority is also aware that for all land use options considered in the Mahon Strategic Transport and Traffic Assessment which supported the LAP, the use for Jacob's Island was residential and local services only. Therefore these listed amendments to include for an increase in employment/retail quanta further undermine our confidence in the modelling undertaken for the Local Area Plan and potentially negatively impact the N40.

It is our understanding that analysis by the Council Planning Department using the data included in the Mahon Strategic Transport and Traffic Assessment and subsequent *Jacob's Island Addendum*, indicated that the inclusion of additional non-residential uses would:

- be contrary to national transportation policy, in that development would be car-borne and not support the achievement of smarter travel targets or support investment in public transport due to high car usage rates which would apply to offices on Jacob's Island.
- have an adverse impact on the Mahon Interchange and the N40;

- undermine the overall development potential of Mahon due to the adverse impact on the Mahon Interchange;
- undermine the case for rapid transit to Cork.

It is also a concern, that there has been no scenario testing of the impact of this proposed non-residential development proposed on the network especially the national road infrastructure.

The Authority would highlight that:

- Access to the Jacobs Island area is highly reliant on the Mahon Junction and N40.
- There is limited availability of public transport to the subject site to offset the significant reliance on private car borne trips which will be generated.
- The proposed land uses are dependent upon a car borne catchment utilising the N40.
- There is already a significant supply of land with an employment zoning objective within Mahon capable of accommodating employment in excess of the employment targets for Mahon to 2031.
- A quantum scale of retail / commercial development has been previously assessed and refused by Bord Pleanála (PI 28.232675).
- Outstanding permission exists for commercial development including 1200sqm of retail space (PL28 .232275) (please note not just convenience).
- The City Council Planning Policy Section Report on planning application ref no. 13/35575 concluded that 90% of trips to the proposed neighbourhood centre would be external to Jacobs Island and as such, reliant on the Mahon Junction for access. It is the Authority's opinion that the level of retailing proposed in the subject development proposal is in excess of what is required to serve the planned residential neighbourhood in Jacobs Island and will result in customers being drawn from the wider Mahon area and perhaps further.
- There is also provision within a 5 minute drive time from existing established stores which unlike the proposal at Jacobs Island do not draw traffic through the N40 or Mahon Junction.
- There are more suitable sites for such retail development within the proposed plan area (Avenue De Rennes).

This appraisal would also coincide with inclusions in the NTA submission to the Draft LAP (dated 16th September 2013) which indicated the inappropriateness of locating further development south of the interchange due to

- Its physical separation from Mahon by the N40 Mahon Interchange and the resultant local trips which would be loaded onto the interchange;
- The challenges of delivering a level of public transport service and network accessibility which counterbalances the competitive advantage which its location adjacent to the N40 affords to car mode, for non-local trips;
- The challenges in delivering a walking and cycling environment in the vicinity of the interchange, which delivers a competitive advantage to walking and cycling for local trip making to areas, north of the interchange;
- In general, the need to consolidate future development in areas which can provide the greatest support for higher levels of public transport service in Mahon and around the district centre core.

The Authority would also support this view.

It is therefore the Authority's opinion that justification for an increase in quantum of non-residential uses in Jacobs Island has not been established and/or justified.

The Authority considers that the Alterations as referenced to Table 4 of this correspondence, due to the location, nature and size of the development proposed will give rise to unnecessary local traffic generation on the strategic national road network which would be contrary to the provisions of official policy and therefore at variance with the provisions of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012).

The Authority therefore considers that having regard to the strategic importance of the junction and national road network at this location, the reliance on the Mahon Junction for all access to and from Jacobs Island and the particular sensitivity the junction has to additional traffic loading, that these amendments be reviewed and/or omitted.

CONCLUSION

From the Authority's point of view, all the national road junctions in the Cork Metropolitan area are extremely important thus the impact of development generated traffic (residential and commercial) must be managed so as not to unduly interfere with the strategic movement of goods and people to/from the Cork region.

The Authority considers that the N40 Southern Ring Road is vital to the movement of national route traffic around the Cork Metropolitan area and any delays and congestion on this corridor have an immediate, wide impact across the entire Cork City.

The Authority again acknowledges that the Cork City Development Plan designates the Mahon area for development. The Authority again commends the Council in its approach to transportation but despite the analysis submitted we still remain to be convinced that the focus for the development in the area surrounding the Mahon Interchange will not going to be excessively dependent on the use of the private car and also the provision of access to the national roads network.

The Authority is willing to meet to further discuss the issues raised in this correspondence with members of the executive as an aid to devising an appropriate and sustainable development strategy please do not hesitate to contact me.

Yours sincerely



Tara Spain
Senior Policy Advisor (Planning)

Pat Ledwidge
Director of Services
Planning & Development Directorate
Cork City Council
City Hall
Cork City

Teach Naomh Máirtín / Bóthar Waterloo / Baile Átha Cliath 4
 St. Martin's House / Waterloo Road / Dublin 4
 Teil: / Tel: + 353 1 660 2511 Facs: / Fax: + 353 1 668 0009

Dáta | Date

20 January 2014

Ár dTag. | Our Ref.

NRA Ref: 13-89231

Bhur dTag. | Your Ref.

Noticed of Proposed Variation No. 11 (Mahon Local Area Plan) of the Cork City Development Plan 2009-2015

Dear Mr. Ledwidge,

Firstly the Authority wishes to acknowledge the significant commitment by the planning authority to obtaining modal shift and public transportation as demonstrated by elements of the Draft Mahon Local Area Plan, the existing City Development Plan and active CASP involvement.

As the Council is aware the N40 Cork South Ring Road provides a southern bypass of Cork City and is vital to the movement of strategic traffic around the Cork Metropolitan area. Delays and congestion on this corridor have an immediate wide impact across the city. Traffic problems on the N40 are due largely to the high demands through the Jack Lynch Tunnel and the turning movements, particularly the heavy flows between the N40 East and the Tunnel and the M8/N8 and the Tunnel. The Mahon Interchange is the first junction to the south of the Jack Lynch Tunnel and so it forms an important access into the city for traffic from East Cork and traffic from the N28 (i.e. Carrigaline/Ringaskiddy). The Interchange currently experiences significant traffic queuing on its gyratory and approaches to the signals at peak times especially at weekend peaks. This in turn leads to further traffic congestion on the Mahon Interchange access ramps and queuing on the N40 mainline.

Therefore in accordance with the DOECLG's Spatial Planning and National Roads Guidelines for Planning Guidelines (2012), there is a critical need to assess, mitigate and plan for the interface between potential development proposals and the national road network.

The Authority submits the following observations on the Variation No. 11 (Mahon Local Area Plan) of the Cork City Development Plan 2009-2015 for the Councils consideration:

LAND USE ISSUES

No.	Name	Amendment Proposed
3	Land Uses that are open for consideration	<p>3. Amend text in paragraph 14.6</p> <p>Refer to the fact that the Local Area Plan will define uses that will be open for consideration.</p> <p>Reason: Consistency with <i>Draft Mahon Local Area Plan 2013</i>.</p>

The Authority is aware that the City Council disagrees with the NRA with respect to increased residential and economic development quanta in Tranche 1 compared to that proposed in the Mahon Strategic Transportation and Traffic Assessment (Mahon STTA), 2012.

Having reviewed the City Managers Report on submissions and alterations to the Draft Local Area Plan and its associated Mahon STTA, the Authority remains of the view that sufficient information has not been presented to allow an adequate assessment of the impacts of the proposed land uses to be permitted under variation amendment no. 3 detailed above. This is further aggravated by the increase in non-residential land uses proposed by alterations to the Draft Local Area Plan located in Jacobs Island.

The Authority has serious concerns in relation to significant further non- residential land uses occurring to the south of the N40 interchange and therefore considers that this variation is premature pending the re-evaluation of issues to be detailed below and is therefore not in accordance with the requirements of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012).

As already highlighted, during peak times, long queues and delays occur at the N40 Interchange at Mahon. Any additional traffic may have a negative impact on the carrying capacity and safety of the junction. In light of this, it is clear that there is a significant risk that the development quanta proposed will lead to further congestion on the road network which could have significant consequences for the operation and efficiency of the N40, and the Mahon Interchange.

The Authority strongly recommends that the following key concerns need to be addressed prior to the adoption of the variation:

1. The Mahon Interchange can block back to the N40 mainline, which significantly reduces the level of service to traffic travelling on the N40. As a consequence it is important that any proposals to intensify land uses in this area are carefully considered and analysis of the N40 junction at Mahon is undertaken.

The land use proposals outlined in the Mahon STTA, the Draft Mahon LAP plan, and its associated amendments demonstrate a significant increase in both residential and employment development quanta.

The Draft Mahon LAP including the amendments propose increased development quanta in Tranche 1 compared to that proposed in the Mahon STTA, and an associated intensification of use at the Mahon Interchange and N40 mainline. This has been further supplemented by additional development in Jacobs's island. Therefore, the Authority recommends that the STTA is revisited and revised to assess the impact of these changes and include an assessment of the N40 Interchange at Mahon as had been previously requested.

2. The land use proposals outlined in the Draft Mahon LAP and associated increases in the amendments propose a significant increase in both residential and employment development. This is supplemented by the statements included in the Mahon LAP that there are transport capacity concerns.

Detailed information of the proposed trip rates have not been presented in the documents presented for review. In the absence of these, the Authority's calculations indicate a greater than 71% increase in vehicle trips may be anticipated over the lifetime of the plan. This issue needs to be examined and clarified accordingly as early as possible and not through the development management process as proposed by the amendments to the Draft Local Area Plan.

3. Insufficient information has been provided to demonstrate how the local area trips will distribute traffic through the network. More detailed assessments of the traffic distribution are necessary including details of all assumptions and methods used in assigning trips to the network.
4. The traffic assessment in the Mahon STTA is dependent on a vehicular modal split target of 55% in Tranche 1, and 45% in Tranche 2 being achieved. However, sensitivity tests need to be undertaken using a higher vehicular modal split, in order to examine the traffic impact on the N40 interchange should modal split targets not be achieved.
5. Given the ambitious vehicle modal split targets of 55% in Tranche 1, and 45% in Tranche 2, more detailed information should be provided regarding the program for delivery of the proposed public transport infrastructure. Further clarity is needed on agreements with operators, public transport journey times, and expected level of service, public transport capacity, and bus headways would assist in understanding whether the modal split targets will be achieved and/or are achievable.

The Authority remains of the opinion that the Draft Mahon LAP and the Mahon STTA reports have not presented traffic analysis of the N40 Mahon Interchange and mainline associated with proposed development quanta. This is a critical concern given the increase in proposed development quanta and land uses proposed as the impact of the land use are not available to identify the level and form of mitigation required.

JACOBS ISLAND

Jacob's Island is a residential development area physically separated from Mahon by the N40 Mahon Interchange. Due to this physical separation there are very real transport impediments to providing sustainable transport solutions to development on Jacob's Island and therefore resultant local trips would be loaded onto the national road interchange. The Authority understood from the City Development Plan and also the ethos of the Mahon Local Area Plan that the appropriate land use strategy for Jacob's Island was for residential use with local services only. This strategy appears to have been altered.

Associated with our concerns with regards to prematurity of this variation (particularly amendment nos. 3 and 6), the Authority was also aware that all land use options considered in the Mahon Strategic Transport and Traffic Assessment which supported the LAP the use for Jacob's Island was residential and local services. Therefore this variation will facilitate increase employment/retail quanta which is untested and planned for.

It is our understanding that analysis by the Council Planning Department using the data included in the Mahon Strategic Transport and Traffic Assessment and subsequent *Jacob's Island Addendum*, indicated that the inclusion of additional non-residential uses would:

- be contrary to national transportation policy, in that development would be car-borne and not support the achievement of smarter travel targets or support investment in public transport due to high car usage rates which would apply to offices on Jacob's Island.
- have an adverse impact on the Mahon Interchange and the N40;
- undermine the overall development potential of Mahon due to the adverse impact on the Mahon Interchange;
- undermine the case for rapid transit to Cork.

It is also a concern, that there has been no scenario testing of the impact of this proposed non-residential development proposed on the network especially the national road infrastructure.

With respect to the retail use (variation no. 6), the Authority would highlight that:

- Access to the Jacobs Island area is highly reliant on the Mahon Junction and N40.
- There is limited availability of public transport to the subject site to offset the significant reliance on private car borne trips which will be generated.
- The proposed land uses are dependent upon a car borne catchment utilising the N40.
- A quantum scale of retail / commercial development has been previously assessed and refused by Bord Pleanála (PI 28.232675).
- Outstanding permission exists for commercial development including 1200sqm of retail space (PL28 .232275) (please note not just convenience).
- The City Council Planning Policy Section Report on planning application ref no. 13/35575 concluded that 90% of trips to the proposed neighbourhood centre would be external to Jacobs Island and as such, reliant on the Mahon Junction for access. It is the Authority's opinion that the level of retailing proposed in the subject development proposal is in excess of what is required to serve the planned residential neighbourhood in Jacobs Island and will result in customers being drawn from the wider Mahon area and perhaps further.
- There is also provision within a 5 minute drive time from existing established stores which unlike the proposal at Jacobs Island do not draw traffic through the N40 or Mahon Junction.
- There are more suitable sites for such retail development within the proposed plan area (Avenue De Rennes).

This appraisal would also coincide with inclusions in the NTA submission to the Draft LAP (dated 16th September 2013) which indicated the inappropriateness of locating further development south of the interchange due to

- Its physical separation from Mahon by the N40 Mahon Interchange and the resultant local trips which would be loaded onto the interchange;
- The challenges of delivering a level of public transport service and network accessibility which counterbalances the competitive advantage which its location adjacent to the N40 affords to car mode, for non-local trips;
- The challenges in delivering a walking and cycling environment in the vicinity of the interchange, which delivers a competitive advantage to walking and cycling for local trip making to areas, north of the interchange;
- In general, the need to consolidate future development in areas which can provide the greatest support for higher levels of public transport service in Mahon and around the district centre core.

The Authority would also support this view.

It is therefore the Authority's opinion that justification for an increase in quantum of non-residential uses and especially retail as well as designation of a neighbourhood centre in Jacobs Island has not been established and/or justified.

The Authority considers that variation amendment no. 6 due to the nature of the development proposed and its location will give rise to unnecessary local traffic generation on the strategic national road network contrary to the provisions of official policy and therefore at variance with the provisions of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012).

CONCLUSION

From the Authority's point of view, all the national road junctions in the Cork Metropolitan area are extremely important thus the impact of development generated traffic (residential and commercial) must be managed so as not to unduly interfere with the strategic movement of goods and people to/from the Cork region. The Authority considers that the N40 Southern Ring Road is vital to the movement of national route traffic around the Cork Metropolitan

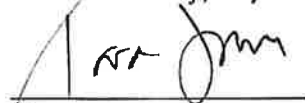
area and any delays and congestion on this corridor have an immediate, wide impact across the entire Cork City.

Road capacity remains a key driver of economic considerations. As the number of vehicles using the national road network increases the level of service for all vehicles will decrease. In other words, adding additional vehicles to the national road net increases journey times for all users. Increasing population and car ownership rates, changes in lifestyle and employment, and improvements in the quality of the road network have contributed to the outward expansion of urban areas. This pattern of development leading to increases in trip distance and is making public transport, cycling and walking less attractive. This imposes a real cost on road users and the economy as a whole.

Given that the funding for new road infrastructure is limited, managing travel demand on the network in tandem with efficient and effective operation and maintenance regimes is critical to safeguarding the long term economic, environmental and safety benefits from the recently constructed national motorway network. The Authority would also highlight that the Department of Public Expenditure and Reforms "Infrastructure and Capital Investment 2012-16: Medium Term Exchequer Framework" (November, 2011) highlights amongst the main priorities for the Government over the medium term will be ensuring adequate maintenance of the National Road Network in order to protect the value of previous investments.

Finally the Authority again commends the Council in its overall integrated approach to transportation and land use in the Cork City Development Plan and would respectfully request that the aforementioned issues are considered in the prior to the adoption of the variation.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Tara Spain', written over a horizontal line.

Tara Spain
Senior Policy Advisor (Planning)

Owen Shinkwin

From: Tara Spain <tspain@nra.ie>
Sent: 21 January 2014 13:22
To: Owen Shinkwin
Subject: Fwd: Mahon Jacobs Island
Attachments: Letter to LA 21 Jan..docx

Fyi

Sent from Samsung Mobile

----- Original message -----

From: "Niall Cussen - (DECLG)" <Niall.Cussen@environ.ie>
Date: 21/01/2014 13:05 (GMT+00:00)
To: Tara Spain <tspain@nra.ie>
Subject: RE: Mahon Jacobs Island

Tara

Noted

This is what we are issuing today.

OK with that?

Niall

From: Tara Spain [<mailto:tspain@nra.ie>]
Sent: 21 January 2014 10:32
To: Niall Cussen - (DECLG)
Subject: FW: Mahon Jacobs Island

Niall

Good Morning

As discussed there is a significant issue arising in Cork City. The members have endorsed a variation/amendment to add 15,000sqm of office space to Jacobs Island South of the Mahon Interchange as well as bumping up the retail quota. Although the responses attached are very long, the key issues are as follows:

- * Access to the Jacobs Island area is highly reliant on the Mahon Junction and N40.
- * There is limited availability of public transport to the subject site to offset the significant reliance on private car borne trips which will be generated.

- * The challenges in delivering a walking and cycling environment in the vicinity of the interchange, which delivers a competitive advantage to walking and cycling for local trip making to areas, north of the interchange;
- * The proposed land uses are dependent upon a car borne catchment utilising the N40.
- * There is already a significant supply of land with an employment zoning objective within Mahon capable of accommodating employment in excess of the employment targets for Mahon to 2031.
- * A quantum scale of retail / commercial development has been previously assessed and refused by Bord Pleanála (PI 28.232675).
- * Outstanding permission exists for commercial development including 1200sqm of retail space (PL28 .232275) (please note not just convenience).
- * There is also provision within a 5 minute drive time from existing established stores which unlike the proposal at Jacobs Island do not draw traffic through the N40 or Mahon Junction. There are more suitable sites for such retail development already within the proposed plan area (Avenue De Rennes).
- * In general, the need to consolidate future development in areas which can provide the greatest support for higher levels of public transport service in Mahon and around the district centre core.

Finally, the City Council are also proposing a transport model to manage development quota. Although we have considerable reservations about the current modelling this provides an opportunity to "get it right" . It is therefore important that a formal agreement needs to be reached between relevant transport authorities on the assumptions which form the basis, testing and management for the proposed development management model as early as possible prior to the lodgement of any planning application to avoid any future conflicts and facilitate better management.

I would be grateful for your support on the above issues which I have also raised with the NTA

Regards

Tara

Tara Spain
Senior Policy Advisor (Planning)
National Roads Authority
St. Martins House
Waterloo Road
Dublin 4
Direct Dial 0035316658849

NRA E-mail system: This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager.

I'm supporting The Gathering Ireland 2013. Go to www.thegatheringireland.com<<http://www.thegatheringireland.com>> and Be Part of it!

Is faoi rún agus chun úsáide an té nó an aonán atá luaite leis, a sheoltar an ríomhphost seo agus aon comhad atá nasctha leis. Má bhfuair tú an ríomhphost seo trí earráid, déan teagmháil le bhainisteoir an chórais.

Deimhnítear leis an bhfo-nóta seo freisin go bhfuil an teachtaireacht ríomhphoist seo scuabtha le bogearraí frithvíorais chun víorais ríomhaire a aimsiú.

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager.

This footnote also confirms that this email message has been swept by anti-virus software for the presence of computer viruses.

--

This email was virus checked by Edge\Guard. Managed by Trilogy Technologies.



Comhshaol, Pobal agus Rialtas Áitiúil
Environment, Community and Local Government



21 January, 2014.

Mr. Patrick Ledwidge
Director of Services
Strategic Planning & Economic Development Directorate
Cork City Council
City Hall
Cork.

Re: Variation No. 11 Cork City Development Plan and Material Alterations to Draft Mahon Local Area Plan

Dear Mr. Ledwidge,

I am directed by the Minister for the Environment, Community and Local Government to refer to your recent request for submissions in respect of the above proposal and set out hereunder observations on behalf of the Minister for consideration by the Council.

The Department notes the content of Variation No. 11 of the Cork City Development Plan 2009-2015 and the proposed alterations to the Draft Mahon Local Area Plan 2013, which the Department outlined a response to in September 2013.

Given the interwoven nature of both plan review processes, the Departments observations should be interpreted and acted on, as appropriate in relation to both documents.

The Department re-iterates the points made in its previous submission on the Draft Local Area Plan in September 2013 but wishes to add the following points.

The Department is concerned that proposed alteration No. 64 would be contrary to wider City Council and joint City and County Retail Strategy policies and objectives as regards the appropriate hierarchy of retail centres for the city.

The proposed alterations would appear to be seeking to facilitate re-designation of an essentially locally driven retail centre for housing areas at Jacobs point adjacent to the South Ring as a Neighbourhood Centre.

Such re-designation would be likely to be contrary to the Joint Retail Strategy and would be likely to have an impact on adjoining transport infrastructure.

In addition, the Department notes the content of this alteration referring to the suitability of the site for up to 15,000 sq. metres (gross) business and technology employment uses.

The Department would tend to the view that the effect of this aspect of the alteration would be to undermine the role of nearby Mahon Point and more significantly the City Centre area as the appropriate destination for such activities and development.

The views of the National Roads Authority may be relevant in this regard and should be closely studied by the Planning Authority.

Taking account of the above, the Department is of the view that proposed alteration No. 64 should not be proceeded with in order to ensure the Mahon Local Area Plan 2013 is consistent with the City Development Plan.

Yours sincerely,

Patrick O'Sullivan,
Planning Section

Owen Shinkwin

From: Tara Spain <tspain@nra.ie>
Sent: 21 January 2014 10:34
To: Hugh Creegan
Subject: Mahon Jacobs Island
Attachments: mahon amendments.pdf; mahon variation.pdf

Hugh

Good Morning

There is a significant issue arising in Cork City. The members have endorsed a variation/amendment to add 15,000sqm of office space to Jacobs Island South of the Mahon Interchange as well as bumping up the retail quota.

I have been working with Owen Shinkwin on the issues but I would highlight that it is a very unsustainable approach both to transport and land use planning in the City and could undermine any benefits both Authorities are undertaking in Cork.

Although the responses attached are very long, the key issues are as follows:

- Access to the Jacobs Island area is highly reliant on the Mahon Junction and N40.
- There is limited availability of public transport to the subject site to offset the significant reliance on private car borne trips which will be generated.
- The challenges in delivering a walking and cycling environment in the vicinity of the interchange, which delivers a competitive advantage to walking and cycling for local trip making to areas, north of the interchange;
- The proposed land uses are dependent upon a car borne catchment utilising the N40.
- There is already a significant supply of land with an employment zoning objective within Mahon capable of accommodating employment in excess of the employment targets for Mahon to 2031.
- A quantum scale of retail / commercial development has been previously assessed and refused by Bord Pleanála (PI 28.232675).
- Outstanding permission exists for commercial development including 1200sqm of retail space (PL28.232275) (please note not just convenience).
- There is also provision within a 5 minute drive time from existing established stores which unlike the proposal at Jacobs Island do not draw traffic through the N40 or Mahon Junction. There are more suitable sites for such retail development already within the proposed plan area (Avenue De Rennes).
- In general, the need to consolidate future development in areas which can provide the greatest support for higher levels of public transport service in Mahon and around the district centre core.

Finally, the City Council are also proposing a transport model to manage development quota. Although we have considerable reservation about the current modelling this provides an opportunity to "get it right". It is therefore important that a formal agreement needs to be reached between relevant transport authorities on the assumptions which form the basis, testing and management for the proposed development management model as early as possible prior to the lodgement of any planning application to avoid any future conflicts and facilitate better management.

I would be grateful for your support on the above issues which I have also raised with the DOE.

Regards

Tara

Tara Spain
Senior Policy Advisor (Planning)
National Roads Authority
St. Martins House
Waterloo Road
Dublin 4
Direct Dial 0035316658849

NRA E-mail system: This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager.

I'm supporting The Gathering Ireland 2013. Go to www.thegatheringireland.com and Be Part of it!

--

This email was virus checked by Edge\Guard. Managed by Trilogy Technologies.

Pat Ledwidge
Director of Services
Planning & Development Directorate
City Hall
Cork City

Teach Naomh Máirtín / Bóthar Waterloo / Baile Átha Cliath 4
St. Martin's House / Waterloo Road / Dublin 4
Teil: / Tel: + 353 1 660 2511 Facs: / Fax: + 353 1 668 0009

Dáta | Date

20 January 2014

Ár dTag. | Our Ref.

NRA Ref: 14-89281

Bhur dTag. | Your Ref.

Re: Amendments to Draft Mahon Local Area Plan 2013

Dear Mr. Ledwidge,

Firstly the Authority wishes to acknowledge the significant commitment by the planning authority to obtaining modal shift and public transportation as demonstrated by elements of the Draft Mahon Local Area Plan, the existing City Development Plan and active CASP involvement.

As the Council is aware, the N40 Cork South Ring Road provides a southern bypass of Cork City and is vital to the movement of strategic traffic around the Cork Metropolitan area. Delays and congestion on this corridor have an immediate wide impact across the city. Traffic problems on the N40 are due largely to the high demands through the Jack Lynch Tunnel and the turning movements, particularly the heavy flows between the N40 East and the Tunnel and the M8/N8 and the Tunnel. The Mahon Interchange is the first junction to the south of the Jack Lynch Tunnel and so it forms an important access into the city for traffic from East Cork and traffic from the N28 (i.e. Carrigaline/Ringaskiddy). The Interchange currently experiences significant traffic queuing on its gyratory and approaches to the signals at peak times especially at weekend peaks. This in turn leads to further traffic congestion on the Mahon Interchange access ramps and queuing on the N40 mainline.

Therefore in accordance with the DOECLG's Spatial Planning and National Roads Guidelines for Planning Guidelines (2012), there is a critical need to assess, mitigate and plan for the interface between potential development proposals and the national road network. Within this context, the Authority submits the following observations on the South Mahon Local Area Plan for consideration by the Council:

1. CLARIFICATION OF CONSULTATION

The Authority notes Alteration no. 26, S3.4.2 and wishes to advise that although we acknowledge that consultation occurred during the drafting of the plan, issues raised by the NRA were not addressed in full which is clear from our previous submissions and also repeated in written correspondence during the preparation the Draft Local Area Plan.

2. INCREASED CONNECTIVITY

Table 1		
No.	Proposed Alteration	LAP Page no.
66	(insert new paragraph) The City Council will consider the feasibility of providing a vehicular link directly from the shopping centre onto the Mahon Interchange slip road to see whether it is desirable from an engineering, traffic and policy grounds.	85

In relation to Alteration no. 66 detailed above the Authority would refer the City Council to Section 2.7 Development at National Road Interchanges or Junctions of Spatial Planning and National Roads Guidelines for Planning Authorities (DOELG 2012). The Authority advises that it would not be supportive of additional junction/enhancements at this location. The NRA's has already expressed concerns with regard to similar enhancements/junctions in proximity to the Mahon Interchange relating to traffic capacity, safety and national roads policy.

The Authority recommends that issues with regard to capacity of the existing junction would be best dealt with by the continued engagement of the City Council in the NRA Demand Management Study for the N40.

3. DEVELOPMENT STRATEGY IMPLEMENTATION

Table 2		
No.	Proposed Alteration	LAP Page no.
61 abridged	Land use Strategy Zoning objective definitions are set out in the current <i>Cork City Development Plan</i> . Mahon Point Shopping Centre The development of Mahon Point Shopping Centre is subject to constraints set out in the <i>Cork Strategic Retail Study</i> , as incorporated in the current development plan. The further development of the area to the north of the shopping centre will..... therefore be driven by non-retail uses. The future of this area is most likely to include a mix of residential, local services uses (e.g. commercial leisure and retail services) and public open space to meet the needs of the shopping centre and the wider sub-area and in compliance with development plan open space standards. A detailed strategy for the development of this area will be developed in partnership with the developer through the development management system.	83

With relation to the highlighted statement above in Alteration no. 61, the Authority would refer the planning authority to Chapter 2 of the DOEHLG's Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities which state that '*Non-statutory framework plans and site development briefs can supplement but not replace the function of statutory plans*'.

Given the sensitivity of the area to further development as indicated throughout the Draft Local Area Plan and its amendments, the Authority considers it essential that the proposed development strategy should be referred to relevant stakeholders for consultation and agreement prior to the receipt of any planning application especially as regards to impact on transportation issues (in the NRA's case the N40) and the range of development which will be permitted in this area. This could potentially avoid any conflicting issues arising as planning applications occur.

4. STRATEGIC TRANSPORT IMPACT

The Authority is aware that the City Council disagrees with the NRA with respect to impact of increased residential and economic development quanta in Tranche 1 compared to that already proposed in the Mahon Strategic Transportation and Traffic Assessment (Mahon STTA), 2012.

The Authority remains of this opinion and would highlight that this quanta has been further increased by the addition of additional non residential floorspace in Jacobs Island (amendment no.6, 13, 14, 19 and 64 refer)

Table no.3		
No.	Proposed Alteration	LAP Page no.
13	<p>3.2.1 LAP Employment Target (pp23-25)</p> <p>The employment target for 2011-2021 set out in Table 3.2 (below) reflects the level of employment that has already been committed in Mahon. Equivalent indicative floorspace targets are also included in Table 3.2 based upon an employment density of one worker per 15 gross square metres (gsm). This is indicative and based upon a local assessment of employment densities. In the UK and Ireland office market employment densities have steadily increased and are currently on average 1 person per 12 gross square metres according to the <i>Employment Densities Guide</i> (DJD, 2010). Whilst it is difficult to keep an exact employment figure for the Mahon area (or any area) the City Council will monitor trends as far as it can with the resources that it has available to get an up-to-date figure for use in assessing new development proposals in the Development Management process.</p> <p>The <i>Mahon Strategic Transportation and Traffic Assessment 2012</i> shows that the transport capacity of the Mahon area, based upon a wide range of assumptions, is for 7,400 jobs over 2006 levels. Existing planning permission commitments exceed this maximum transport capacity by 350 600 jobs. Figure 3.0 (below) identifies the major sites with employment and residential planning commitments (current and expired).</p>	24

14	3.2.3: Breakdown of Targets The overall targets for the plan area are broken down into indicative yields for each sub-area in Table 3.4 Table 3.3a: Indicative breakdown of targets Sub-Area SA9: JI Tranche 2 EMPLOYMENT (jobs) 500-1,000 TOTAL FOR LAP EMPLOYMENT (jobs) 3,000*	After 25
32	Development Management and traffic impact The future assessment of development proposals and their transport and traffic impact will be critical to understanding the cumulative impact of trip generation on the transport system on the local network of streets, the N40 and the Mahon Interchange. The City Council needs to be sure that all traffic modelling accurately reflects the cumulative impact of existing development and development benefitting from planning permission, and therefore it will require all development proposals to be assessed using the Mahon Saturn traffic model developed for the purposes of the <i>Mahon Transport and Traffic Assessment 2012</i> , subject to any agreed updates to modelling assumptions. There may also be requirements for the supplementary modelling of junctions using complementary traffic modelling software. The 2012 assessment demonstrated that there is very limited capacity for net increases in employment levels over that committed by the major planning permissions on the former MA/COM and Motorola sites. (Insert new sub-section above Objective T03: Minimising Impact of Vehicles	39

Having reviewed the City Managers Report on submissions and associated amendments and Mahon STTA, the Authority remains of the view that sufficient information has not been presented to allow an adequate assessment of the impacts of the proposed land uses. This is further aggravated by the inclusion of alterations no. 13 and 14 indicted in the table above. Alteration 14 proposes an increase in non-residential land uses while alteration 13 proposes an unclear methodology of monitoring via the development management process which appears to be supplemented by Alteration 32.

As already highlighted, during peak times, long queues and delays occur at the N40 Interchange at Mahon. Any additional traffic may have a negative impact on the carrying capacity and safety of the junction. In light of this, it is clear that there is a significant risk that the development quanta proposed will lead to further congestion on the road network which could have significant consequences for the operation and efficiency of the N40, and the Mahon Interchange. As included in alterations no. 13 and 32, there are existing transport capacity issues. The Authority therefore considers that the proposed amendments are not in accordance with the requirements of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012).

The Authority strongly recommends that the following key concerns need to be addressed prior to the final adoption of the plan:

1. The Mahon Interchange can block back to the N40 mainline, which significantly reduces the level of service to traffic travelling on the N40. As a consequence, it is important that any proposals to intensify land uses in this area are carefully considered and analysis of the N40 junction at Mahon is undertaken.

The land use proposals outlined in the Mahon STTA, the Draft Mahon LAP plan, and its associated amendments demonstrate a significant increase in both residential and employment development quanta.

The Draft Mahon LAP and these subsequent amendments propose increased development quanta in Tranche 1 (including additional economic development in Jacobs's island) compared to that proposed in the Mahon STTA, and an associated intensification of use at the Mahon Interchange and N40 mainline. Therefore, the Authority recommends that the STTA must be revisited and revised to assess the impact of these changes and include an assessment of the N40 Interchange at Mahon as had been previously requested and not as part of a development management monitoring process as proposed in Alterations no. 13 and 32.

2. The land use proposals outlined in the Draft Mahon LAP, and associated increases in the amendments, propose a significant increase in both residential and employment development. This is supplemented by the statements included in the Mahon LAP that there are transport capacity concerns (alteration 13 & 32)

Detailed information of the proposed trip rates have not been presented in the documents presented for review. In the absence of these, the Authority's calculations indicate a greater than 71% increase in vehicle trips may be anticipated over the lifetime of the plan. This issue needs to be examined and clarified accordingly as early as possible and not predominantly through the development management process as proposed by alteration nos. 13 and 32.

3. Insufficient information has been provided to demonstrate how the local area trips will distribute traffic through the network. More detailed assessments of the traffic distribution are necessary including details of all assumptions and methods used in assigning trips to the network.
4. The traffic assessment in the Mahon STTA is dependent on a vehicular modal split target of 55% in Tranche 1, and 45% in Tranche 2 being achieved. However, sensitivity tests need to be undertaken using a higher vehicular modal split, in order to examine the traffic impact on the N40 interchange should modal split targets not be achieved.
5. Given the ambitious vehicle modal split targets of 55% in Tranche 1, and 45% in Tranche 2, more detailed information should be provided regarding the program for delivery of the proposed public transport infrastructure. Further clarity is needed on agreements with operators, public transport journey times, and expected level of service, public transport capacity, and bus headways would assist in understanding whether the modal split targets will be achieved and/or are achievable.

The Authority remains of the opinion that the Draft Mahon LAP and the Mahon STTA reports have not presented traffic analysis of the N40 Mahon Interchange and mainline associated with proposed development quanta.

An assessment needs be undertaken on the impact on the N40 infrastructure, with the results of this traffic modelling provided. This is a critical concern given the increase in proposed development quanta. Assumptions made in the traffic modelling analysis including, the trip generation, trip assignment/distribution, and the sensitivity tests, should and need to be provided. Furthermore, traffic modelling should be undertaken for a weekend peak as highlighted as an issue in alteration no. 15. In this way, it can be concluded what the impact of the land use proposals will be, and also identify the level and form of mitigation required.

The inclusion of alteration no. 32 is welcomed to a limited extent but does not address the element of the stated quanta proposed by the LAP. The Authority continues to strongly advise that a revised assessment needs to be undertaken and presented to fully assess the potential impact of the intensification and programming of land use proposals in this area which should not be left to incremental implementation through development management.

The Authority recommends that if this objective remains, that a formal agreement needs to be reached between relevant transport authorities on the assumptions which form the basis, testing and management of this proposed development management model as early as possible prior to the lodgement of any planning application. This process should be clearly outlined and included in the text of the adopted local area plan.

4. JACOBS ISLAND

The Authority has serious concerns in relation to significant further non-residential development occurring to the south of the N40 interchange as proposed by the alterations listed in the table below.

Table no.4 Proposed Alterations to Draft Mahon Local Area 2013		
No.	Proposed Alteration	LAP Page no.
3	Table 1.3 Jacob's Island Centre Replace "Indicative Location for Local Centre" with "Indicative Location for Neighbourhood Centre" symbol.	5
6	Table 2.2: Potential to Accommodate New Residential + Employment Development SA9 Jacob's Island Yes (neighbourhood centre related and limited business and technology employment)	9
13	3.2.1 LAP Employment Target (pp23-25) The employment target for 2011-2021 set out in Table 3.2 (below) reflects the level of employment that has already been committed in Mahon. Equivalent indicative floorspace targets are also included in Table 3.2 based upon an employment density of one worker per 15 gross square metres (gsm). This is indicative and based upon a local assessment of employment densities. In the UK and Ireland office market employment densities have steadily increased and are currently on average 1 person per 12 gross square metres according to the <i>Employment Densities Guide</i> (DJD, 2010). Whilst it is difficult to keep an	24

	<p>exact employment figure for the Mahon area (or any area) the City Council will monitor trends as far as it can with the resources that it has available to get an up-to-date figure for use in assessing new development proposals in the Development Management process.</p> <p>The <i>Mahon Strategic Transportation and Traffic Assessment 2012</i> shows that the transport capacity of the Mahon area, based upon a wide range of assumptions, is for 7,400 jobs over 2006 levels. Existing planning permission commitments exceed this maximum transport capacity by 350 600 jobs. Figure 3.0 (below) identifies the major sites with employment and residential planning commitments (current and expired).</p>					
14	<p>3.2.3: Breakdown of Targets</p> <p>The overall targets for the plan area are broken down into indicative yields for each sub-area in Table 3.4</p> <p>Table 3.3a: Indicative breakdown of targets</p> <p>Sub-Area SA9: JI</p> <p>Tranche 2 EMPLOYMENT (jobs) 500-1,000</p> <p>TOTAL FOR LAP EMPLOYMENT (jobs) 3,000*</p>	After 25				
19	<p>Table 3.4: Mahon: Scope for retail and local services development</p> <p>Neighbourhood Centres</p> <p>Jacob's Island A new neighbourhood centre on Jacob's Island of a scale to serve the needs of the residential population. The current development plan provides for an upgrading of the Local Centre to a Neighbourhood Centre. Currently 1200gsm 4900gsm is committed, of which 300sqm is pure convenience retail.</p>	31				
64 abridged	<table><tr><td colspan="2"><p>4.10: Sub-Area 9: Jacob's Island</p><p>Jacobs Island Sub-area data</p></td></tr><tr><td><p>Residential Development</p><p><i>Existing residential units</i></p><p><i>Gross floor area as a % of total</i></p><p><i>Residential yield [dwellings per hectare]</i></p><p><i>Indicative new units</i></p><p><i>Indicative additional population</i></p><p>Non-residential development</p><p><i>Gross floor area (as a % of total)</i></p><p><i>Non-residential type</i></p></td><td><p>331</p><p>95% minimum</p><p>40-35-90dph (<i>medium – medium-high density</i>)</p><p>250-635- target 410 units</p><p>250-635 (503 committed)</p><p>target 450-units</p><p>600-1530 – target 964</p><p>5% maximum</p><p>Neighbourhood Centre and ancillary local services and up to 15,000gsm business and technology employment uses.</p></td></tr></table>	<p>4.10: Sub-Area 9: Jacob's Island</p> <p>Jacobs Island Sub-area data</p>		<p>Residential Development</p> <p><i>Existing residential units</i></p> <p><i>Gross floor area as a % of total</i></p> <p><i>Residential yield [dwellings per hectare]</i></p> <p><i>Indicative new units</i></p> <p><i>Indicative additional population</i></p> <p>Non-residential development</p> <p><i>Gross floor area (as a % of total)</i></p> <p><i>Non-residential type</i></p>	<p>331</p> <p>95% minimum</p> <p>40-35-90dph (<i>medium – medium-high density</i>)</p> <p>250-635- target 410 units</p> <p>250-635 (503 committed)</p> <p>target 450-units</p> <p>600-1530 – target 964</p> <p>5% maximum</p> <p>Neighbourhood Centre and ancillary local services and up to 15,000gsm business and technology employment uses.</p>	87-89
<p>4.10: Sub-Area 9: Jacob's Island</p> <p>Jacobs Island Sub-area data</p>						
<p>Residential Development</p> <p><i>Existing residential units</i></p> <p><i>Gross floor area as a % of total</i></p> <p><i>Residential yield [dwellings per hectare]</i></p> <p><i>Indicative new units</i></p> <p><i>Indicative additional population</i></p> <p>Non-residential development</p> <p><i>Gross floor area (as a % of total)</i></p> <p><i>Non-residential type</i></p>	<p>331</p> <p>95% minimum</p> <p>40-35-90dph (<i>medium – medium-high density</i>)</p> <p>250-635- target 410 units</p> <p>250-635 (503 committed)</p> <p>target 450-units</p> <p>600-1530 – target 964</p> <p>5% maximum</p> <p>Neighbourhood Centre and ancillary local services and up to 15,000gsm business and technology employment uses.</p>					

	Neighbourhood Centre	1900 1200 gsm local centre committed (convenience and local services) plus appropriate enlargement and additional neighbourhood centre scale shopping	
	Community facilities	Childcare facilities	
	<p>.....</p> <p>An existing planning permission for a local centre of 1900gsm 1,200gsm has been granted to provide for the local commercial services needs of the area. Any additional neighbourhood centre development must complement the existing commitment and must also front onto the spine road. Limited Business and Technology Uses will be open for consideration on Jacob's Island up to a maximum of 15,000 gross square metres on land benefitting from a "Residential, Local Services and Institutions" land use zoning objective. The provision of this proposed use is subject to appropriate transport and traffic capacity assessment and appropriate consideration of residential amenity.</p>		
Fig 4.10	Map Objective NC		

Those concerns can be summarised as follows:

Jacob's Island is a residential development area physically separated from Mahon by the N40 Mahon Interchange. Due to this physical separation there are very real transport impediments to providing sustainable transport solutions to development on Jacob's Island and therefore resultant local trips would be loaded onto the national road interchange. The Authority's understanding was that the City Development Plan and also the ethos of the Mahon Local Area Plan was that the appropriate land use strategy for Jacob's Island was for residential use with local services only.

The Authority is also aware that for all land use options considered in the Mahon Strategic Transport and Traffic Assessment which supported the LAP, the use for Jacob's Island was residential and local services only. Therefore these listed amendments to include for an increase in employment/retail quanta further undermine our confidence in the modelling undertaken for the Local Area Plan and potentially negatively impact the N40.

It is our understanding that analysis by the Council Planning Department using the data included in the Mahon Strategic Transport and Traffic Assessment and subsequent *Jacob's Island Addendum*, indicated that the inclusion of additional non-residential uses would:

- be contrary to national transportation policy, in that development would be car-borne and not support the achievement of smarter travel targets or support investment in public transport due to high car usage rates which would apply to offices on Jacob's Island.
- have an adverse impact on the Mahon Interchange and the N40;

- undermine the overall development potential of Mahon due to the adverse impact on the Mahon Interchange;
- undermine the case for rapid transit to Cork.

It is also a concern, that there has been no scenario testing of the impact of this proposed non-residential development proposed on the network especially the national road infrastructure.

The Authority would highlight that:

- Access to the Jacobs Island area is highly reliant on the Mahon Junction and N40.
- There is limited availability of public transport to the subject site to offset the significant reliance on private car borne trips which will be generated.
- The proposed land uses are dependent upon a car borne catchment utilising the N40.
- There is already a significant supply of land with an employment zoning objective within Mahon capable of accommodating employment in excess of the employment targets for Mahon to 2031.
- A quantum scale of retail / commercial development has been previously assessed and refused by Bord Pleanála (PI 28.232675).
- Outstanding permission exists for commercial development including 1200sqm of retail space (PL28 .232275) (please note not just convenience).
- The City Council Planning Policy Section Report on planning application ref no. 13/35575 concluded that 90% of trips to the proposed neighbourhood centre would be external to Jacobs Island and as such, reliant on the Mahon Junction for access. It is the Authority's opinion that the level of retailing proposed in the subject development proposal is in excess of what is required to serve the planned residential neighbourhood in Jacobs Island and will result in customers being drawn from the wider Mahon area and perhaps further.
- There is also provision within a 5 minute drive time from existing established stores which unlike the proposal at Jacobs Island do not draw traffic through the N40 or Mahon Junction.
- There are more suitable sites for such retail development within the proposed plan area (Avenue De Rennes).

This appraisal would also coincide with inclusions in the NTA submission to the Draft LAP (dated 16th September 2013) which indicated the inappropriateness of locating further development south of the interchange due to

- Its physical separation from Mahon by the N40 Mahon Interchange and the resultant local trips which would be loaded onto the interchange;
- The challenges of delivering a level of public transport service and network accessibility which counterbalances the competitive advantage which its location adjacent to the N40 affords to car mode, for non-local trips;
- The challenges in delivering a walking and cycling environment in the vicinity of the interchange, which delivers a competitive advantage to walking and cycling for local trip making to areas, north of the interchange;
- In general, the need to consolidate future development in areas which can provide the greatest support for higher levels of public transport service in Mahon and around the district centre core.

The Authority would also support this view.

It is therefore the Authority's opinion that justification for an increase in quantum of non-residential uses in Jacobs Island has not been established and/or justified.

The Authority considers that the Alterations as referenced to Table 4 of this correspondence, due to the location, nature and size of the development proposed will give rise to unnecessary local traffic generation on the strategic national road network which would be contrary to the provisions of official policy and therefore at variance with the provisions of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012).

The Authority therefore considers that having regard to the strategic importance of the junction and national road network at this location, the reliance on the Mahon Junction for all access to and from Jacobs Island and the particular sensitivity the junction has to additional traffic loading, that these amendments be reviewed and/or omitted.

CONCLUSION

From the Authority's point of view, all the national road junctions in the Cork Metropolitan area are extremely important thus the impact of development generated traffic (residential and commercial) must be managed so as not to unduly interfere with the strategic movement of goods and people to/from the Cork region.

The Authority considers that the N40 Southern Ring Road is vital to the movement of national route traffic around the Cork Metropolitan area and any delays and congestion on this corridor have an immediate, wide impact across the entire Cork City.

The Authority again acknowledges that the Cork City Development Plan designates the Mahon area for development. The Authority again commends the Council in its approach to transportation but despite the analysis submitted we still remain to be convinced that the focus for the development in the area surrounding the Mahon Interchange will not going to be excessively dependent on the use of the private car and also the provision of access to the national roads network.

The Authority is willing to meet to further discuss the issues raised in this correspondence with members of the executive as an aid to devising an appropriate and sustainable development strategy please do not hesitate to contact me.

Yours sincerely



Tara Spain
Senior Policy Advisor (Planning)

Pat Ledwidge
Director of Services
Planning & Development Directorate
Cork City Council
City Hall
Cork City

Teach Naomh Máirtín / Bóthar Waterloo / Baile Átha Cliath 4
 St. Martin's House / Waterloo Road / Dublin 4
 Teil: / Tel: + 353 1 660 2511 Facs: / Fax: + 353 1 668 0009

Dáta | Date

20 January 2014

Ár dTag. | Our Ref.

NRA Ref: 13-89231

Bhur dTag. | Your Ref.

Noticed of Proposed Variation No. 11 (Mahon Local Area Plan) of the Cork City Development Plan 2009-2015

Dear Mr. Ledwidge,

Firstly the Authority wishes to acknowledge the significant commitment by the planning authority to obtaining modal shift and public transportation as demonstrated by elements of the Draft Mahon Local Area Plan, the existing City Development Plan and active CASP involvement.

As the Council is aware the N40 Cork South Ring Road provides a southern bypass of Cork City and is vital to the movement of strategic traffic around the Cork Metropolitan area. Delays and congestion on this corridor have an immediate wide impact across the city. Traffic problems on the N40 are due largely to the high demands through the Jack Lynch Tunnel and the turning movements, particularly the heavy flows between the N40 East and the Tunnel and the M8/N8 and the Tunnel. The Mahon Interchange is the first junction to the south of the Jack Lynch Tunnel and so it forms an important access into the city for traffic from East Cork and traffic from the N28 (i.e. Carrigaline/Ringaskiddy). The Interchange currently experiences significant traffic queuing on its gyratory and approaches to the signals at peak times especially at weekend peaks. This in turn leads to further traffic congestion on the Mahon Interchange access ramps and queuing on the N40 mainline.

Therefore in accordance with the DOECLG's Spatial Planning and National Roads Guidelines for Planning Guidelines (2012), there is a critical need to assess, mitigate and plan for the interface between potential development proposals and the national road network.

The Authority submits the following observations on the Variation No. 11 (Mahon Local Area Plan) of the Cork City Development Plan 2009-2015 for the Councils consideration:

LAND USE ISSUES

No.	Name	Amendment Proposed
3	Land Uses that are open for consideration	<p>3. Amend text in paragraph 14.6</p> <p>Refer to the fact that the Local Area Plan will define uses that will be open for consideration.</p> <p>Reason: Consistency with Draft Mahon Local Area Plan 2013.</p>

The Authority is aware that the City Council disagrees with the NRA with respect to increased residential and economic development quanta in Tranche 1 compared to that proposed in the Mahon Strategic Transportation and Traffic Assessment (Mahon STTA), 2012.

Having reviewed the City Managers Report on submissions and alterations to the Draft Local Area Plan and its associated Mahon STTA, the Authority remains of the view that sufficient information has not been presented to allow an adequate assessment of the impacts of the proposed land uses to be permitted under variation amendment no. 3 detailed above. This is further aggravated by the increase in non-residential land uses proposed by alterations to the Draft Local Area Plan located in Jacobs Island.

The Authority has serious concerns in relation to significant further non-residential land uses occurring to the south of the N40 interchange and therefore considers that this variation is premature pending the re-evaluation of issues to be detailed below and is therefore not in accordance with the requirements of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012).

As already highlighted, during peak times, long queues and delays occur at the N40 Interchange at Mahon. Any additional traffic may have a negative impact on the carrying capacity and safety of the junction. In light of this, it is clear that there is a significant risk that the development quanta proposed will lead to further congestion on the road network which could have significant consequences for the operation and efficiency of the N40, and the Mahon Interchange.

The Authority strongly recommends that the following key concerns need to be addressed prior to the adoption of the variation:

1. The Mahon Interchange can block back to the N40 mainline, which significantly reduces the level of service to traffic travelling on the N40. As a consequence it is important that any proposals to intensify land uses in this area are carefully considered and analysis of the N40 junction at Mahon is undertaken.

The land use proposals outlined in the Mahon STTA, the Draft Mahon LAP plan, and its associated amendments demonstrate a significant increase in both residential and employment development quanta.

The Draft Mahon LAP including the amendments propose increased development quanta in Tranche 1 compared to that proposed in the Mahon STTA, and an associated intensification of use at the Mahon Interchange and N40 mainline. This has been further supplemented by additional development in Jacobs's island. Therefore, the Authority recommends that the STTA is revisited and revised to assess the impact of these changes and include an assessment of the N40 Interchange at Mahon as had been previously requested.

2. The land use proposals outlined in the Draft Mahon LAP and associated increases in the amendments propose a significant increase in both residential and employment development. This is supplemented by the statements included in the Mahon LAP that there are transport capacity concerns.

Detailed information of the proposed trip rates have not been presented in the documents presented for review. In the absence of these, the Authority's calculations indicate a greater than 71% increase in vehicle trips may be anticipated over the lifetime of the plan. This issue needs to be examined and clarified accordingly as early as possible and not through the development management process as proposed by the amendments to the Draft Local Area Plan.

3. Insufficient information has been provided to demonstrate how the local area trips will distribute traffic through the network. More detailed assessments of the traffic distribution are necessary including details of all assumptions and methods used in assigning trips to the network.
4. The traffic assessment in the Mahon STTA is dependent on a vehicular modal split target of 55% in Tranche 1, and 45% in Tranche 2 being achieved. However, sensitivity tests need to be undertaken using a higher vehicular modal split, in order to examine the traffic impact on the N40 interchange should modal split targets not be achieved.
5. Given the ambitious vehicle modal split targets of 55% in Tranche 1, and 45% in Tranche 2, more detailed information should be provided regarding the program for delivery of the proposed public transport infrastructure. Further clarity is needed on agreements with operators, public transport journey times, and expected level of service, public transport capacity, and bus headways would assist in understanding whether the modal split targets will be achieved and/or are achievable.

The Authority remains of the opinion that the Draft Mahon LAP and the Mahon STTA reports have not presented traffic analysis of the N40 Mahon Interchange and mainline associated with proposed development quanta. This is a critical concern given the increase in proposed development quanta and land uses proposed as the impact of the land use are not available to identify the level and form of mitigation required.

JACOBS ISLAND

Jacob's Island is a residential development area physically separated from Mahon by the N40 Mahon Interchange. Due to this physical separation there are very real transport impediments to providing sustainable transport solutions to development on Jacob's Island and therefore resultant local trips would be loaded onto the national road interchange. The Authority understood from the City Development Plan and also the ethos of the Mahon Local Area Plan that the appropriate land use strategy for Jacob's Island was for residential use with local services only. This strategy appears to have been altered.

Associated with our concerns with regards to prematurity of this variation (particularly amendment nos. 3 and 6), the Authority was also aware that all land use options considered in the Mahon Strategic Transport and Traffic Assessment which supported the LAP the use for Jacob's Island was residential and local services. Therefore this variation will facilitate increase employment/retail quanta which is untested and planned for.

It is our understanding that analysis by the Council Planning Department using the data included in the Mahon Strategic Transport and Traffic Assessment and subsequent *Jacob's Island Addendum*, indicated that the inclusion of additional non-residential uses would:

- be contrary to national transportation policy, in that development would be car-borne and not support the achievement of smarter travel targets or support investment in public transport due to high car usage rates which would apply to offices on Jacob's Island.
- have an adverse impact on the Mahon Interchange and the N40;
- undermine the overall development potential of Mahon due to the adverse impact on the Mahon Interchange;
- undermine the case for rapid transit to Cork.

It is also a concern, that there has been no scenario testing of the impact of this proposed non-residential development proposed on the network especially the national road infrastructure.

With respect to the retail use (variation no. 6), the Authority would highlight that:

- Access to the Jacobs Island area is highly reliant on the Mahon Junction and N40.
- There is limited availability of public transport to the subject site to offset the significant reliance on private car borne trips which will be generated.
- The proposed land uses are dependent upon a car borne catchment utilising the N40.
- A quantum scale of retail / commercial development has been previously assessed and refused by Bord Pleanála (PI 28.232675).
- Outstanding permission exists for commercial development including 1200sqm of retail space (PL28 .232275) (please note not just convenience).
- The City Council Planning Policy Section Report on planning application ref no. 13/35575 concluded that 90% of trips to the proposed neighbourhood centre would be external to Jacobs Island and as such, reliant on the Mahon Junction for access. It is the Authority's opinion that the level of retailing proposed in the subject development proposal is in excess of what is required to serve the planned residential neighbourhood in Jacobs Island and will result in customers being drawn from the wider Mahon area and perhaps further.
- There is also provision within a 5 minute drive time from existing established stores which unlike the proposal at Jacobs Island do not draw traffic through the N40 or Mahon Junction.
- There are more suitable sites for such retail development within the proposed plan area (Avenue De Rennes).

This appraisal would also coincide with inclusions in the NTA submission to the Draft LAP (dated 16th September 2013) which indicated the inappropriateness of locating further development south of the interchange due to

- Its physical separation from Mahon by the N40 Mahon Interchange and the resultant local trips which would be loaded onto the interchange;
- The challenges of delivering a level of public transport service and network accessibility which counterbalances the competitive advantage which its location adjacent to the N40 affords to car mode, for non-local trips;
- The challenges in delivering a walking and cycling environment in the vicinity of the interchange, which delivers a competitive advantage to walking and cycling for local trip making to areas, north of the interchange;
- In general, the need to consolidate future development in areas which can provide the greatest support for higher levels of public transport service in Mahon and around the district centre core.

The Authority would also support this view.

It is therefore the Authority's opinion that justification for an increase in quantum of non-residential uses and especially retail as well as designation of a neighbourhood centre in Jacobs Island has not been established and/or justified.

The Authority considers that variation amendment no. 6 due to the nature of the development proposed and its location will give rise to unnecessary local traffic generation on the strategic national road network contrary to the provisions of official policy and therefore at variance with the provisions of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012).

CONCLUSION

From the Authority's point of view, all the national road junctions in the Cork Metropolitan area are extremely important thus the impact of development generated traffic (residential and commercial) must be managed so as not to unduly interfere with the strategic movement of goods and people to/from the Cork region. The Authority considers that the N40 Southern Ring Road is vital to the movement of national route traffic around the Cork Metropolitan

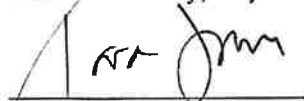
area and any delays and congestion on this corridor have an immediate, wide impact across the entire Cork City.

Road capacity remains a key driver of economic considerations. As the number of vehicles using the national road network increases the level of service for all vehicles will decrease. In other words, adding additional vehicles to the national road net increases journey times for all users. Increasing population and car ownership rates, changes in lifestyle and employment, and improvements in the quality of the road network have contributed to the outward expansion of urban areas. This pattern of development leading to increases in trip distance and is making public transport, cycling and walking less attractive. This imposes a real cost on road users and the economy as a whole.

Given that the funding for new road infrastructure is limited, managing travel demand on the network in tandem with efficient and effective operation and maintenance regimes is critical to safeguarding the long term economic, environmental and safety benefits from the recently constructed national motorway network. The Authority would also highlight that the Department of Public Expenditure and Reforms "Infrastructure and Capital Investment 2012-16: Medium Term Exchequer Framework" (November, 2011) highlights amongst the main priorities for the Government over the medium term will be ensuring adequate maintenance of the National Road Network in order to protect the value of previous investments.

Finally the Authority again commends the Council in its overall integrated approach to transportation and land use in the Cork City Development Plan and would respectfully request that the aforementioned issues are considered in the prior to the adoption of the variation.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Tara Spain', written over a horizontal line.

Tara Spain

Senior Policy Advisor (Planning)

Owen Shinkwin

From: Tara Spain <tspain@nra.ie>
Sent: 13 August 2013 15:53
To: Owen Shinkwin
Subject: RE: Mahon Draft LAP

Thats the one in the text then?
I only have drafts.

Sent from Samsung Mobile

----- Original message -----

From: Owen Shinkwin <owen.shinkwin@nationaltransport.ie>
Date: 13/08/2013 14:36 (GMT+00:00)
To: Tara Spain <tspain@nra.ie>
Subject: RE: Mahon Draft LAP

As of July 2012.
I'm not aware of any additional analysis undertaken since then.

-----Original Message-----

From: Tara Spain [<mailto:tspain@nra.ie>]
Sent: 13 August 2013 13:55
To: Owen Shinkwin
Subject: RE: Mahon Draft LAP

Owen
They haven't sent us the plan.
I'm sending it to Aecom.
Do you have the final copy of the transport study?
In Meath at the moment .

Tara

Sent from Samsung Mobile

----- Original message -----

From: Owen Shinkwin <owen.shinkwin@nationaltransport.ie>
Date: 08/08/2013 13:40 (GMT+00:00)
To: Tara Spain <tspain@nra.ie>
Subject: RE: Mahon Draft LAP

Tara,

Just received the Draft Mahon LAP from Cork City Council, this morning.

Final date for submissions is 16th September.

As I'll be dealing with this before going on holidays, perhaps we can discuss issues of common interest/ concern, next week or the week after.

Owen

From: Tara Spain [<mailto:tspain@nra.ie>]

Sent: 07 August 2013 13:39

To: Owen Shinkwin

Subject: RE:

No problem

From: Owen Shinkwin

[<mailto:owen.shinkwin@nationaltransport.ie>]<[mailto:\[mailto:owen.shinkwin@nationaltransport.ie\]](mailto:[mailto:owen.shinkwin@nationaltransport.ie])>

Sent: 07 August 2013 12:52

To: Tara Spain

Subject: RE:

Thanks.

From: Tara Spain [<mailto:tspain@nra.ie>]

Sent: 07 August 2013 12:50

To: Owen Shinkwin

Subject:

087 1326104

He's in the Kilkenny office email him

Tara Spain

Senior Policy Advisor (Planning)

National Roads Authority

St. Martins House

Waterloo Road

Dublin 4

Direct Dial 0035316658849

NRA E-mail system: This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager.

I'm supporting The Gathering Ireland 2013. Go to

www.thegatheringireland.com<<http://www.thegatheringireland.com><<http://www.thegatheringireland.com><<http://www.thegatheringireland.com>>> and Be Part of it!

Owen Shinkwin

From: Jeremy Ward <jeremy_ward@corkcity.ie>
Sent: 21 January 2014 13:26
To: Owen Shinkwin
Subject: Mahon LAP

Hi Owen

Just wondering if you intend to make a submission to the LAP process?

Jeremy Ward

Senior Executive Planner

Planning Policy Section
Strategic Planning and Economic Development Directorate
Floor 1, Civic Offices, Anglesea Street, Cork

T: 021-492-4450
E: jeremy_ward@corkcity.ie
Web: www.corkcity.ie



Cork City Council
Comhairle Cathrach Chorcaí

--
This email was virus checked by Edge\Guard. Managed by Trilogy Technologies.

Owen Shinkwin

From: David Clements
Sent: 03 September 2013 10:41
To: Owen Shinkwin
Subject: RE: Mahon Draft LAP

Owen,

I will finalise the submission with the guys while you are on leave. Thanks for the draft comment, which will make up the vast majority of what we will say.

David

From: Owen Shinkwin
Sent: 03 September 2013 10:29
To: Roy OConnor; Marian Wilson; Michael MacAree; David Clements; Arlene Finn
Subject: RE: Mahon Draft LAP

All,

Sorry, almost forgot to send the draft on to you.
This is substantially complete but would benefit from additional, supporting points in detail.
Any comments, track changes, etc. please email to David and copying to myself.
Also, Roy, please note Section 5, Table 5.3a.

Regards,

Owen

From: Owen Shinkwin
Sent: 02 September 2013 15:43
To: Roy OConnor; Marian Wilson; Michael MacAree; David Clements; Arlene Finn
Subject: RE: Mahon Draft LAP

Sorry folks, the title of that email should of course have been "Mahon LAP".

From: Owen Shinkwin
Sent: 02 September 2013 15:41
To: Roy OConnor; Marian Wilson; Michael MacAree; David Clements; Arlene Finn
Subject: RE: Cork Metropolitan Area Update

Marian, Roy, Arlene,

As discussed briefly last week, a rather significant local area plan is being prepared for the Mahon area, which comprises a broad range of transport interventions, including new road links, the development of a pedestrian and cycle network, junction improvements providing greater priority for non-car modes, public transport measures including bus network and specific route proposals.

- Marian, your views in regards to proposed service pattern would be useful;

- Roy, your views of the Draft Plan in the context of the 5 year investment strategy objectives, including the strategic bus corridors, would be useful;
- Arlene, your views on Section 3.4.3 (mobility management) would be useful.

The context for this is the addressing of existing congestion and severance issues and the accommodation of an additional 11,700 jobs and 7000 population between 2006 (CASP baseline) and 2031.

I would be grateful if you would review those sections of the draft plan of most relevance to yourselves (Section 3.4 Transport, but a quick reference back to the development objective in Sections 3.1-3.3 would be useful to put the transport proposals in context). I've attached a link to the plan:

<http://www.corkcity.ie/services/strategicplanningeconomicdevelopment/localplanning/localareaplan/mahonlocalareaplan/>

Any comments you have, can you please email to David Clements over the next week or so, copying me in on the response.

An Draft submission by the NTA will follow on from this, which may also be of some help to you.

I can finalise the submission on my return from leave, taking your responses into consideration.

David, if, in light of Marian's, Roy's and Arlene's response, a short meeting would be merited, I would be grateful if you would do so.

Thank you in advance for your input.

Owen

Supporting The Gathering Ireland 2013. Go to www.thegatheringireland.com and Be Part of it!

An t-Údarás Náisiúnta lompair ag tacú le Tóstal Éireann 2013. Téigh chuig www.thegatheringireland.com agus Bí Páirteach ann!

Tá eolas sa teachtaireacht leictreonach seo a d'fhéadfadh bheith príobháideach nó faoi rún agus b'fhéidir go mbeadh ábhar rúnda nó pribhléideach ann. Is le h-aghaidh an duine/na ndaoine nó le h-aghaidh an aonáin atá ainmnithe thuas agus le haghaidh an duine/na ndaoine sin amháin atá an t-eolas. Tá cosc ar rochtain don teachtaireacht leictreonach seo do aon duine eile. Murab ionann tusa agus an té a bhfuil an teachtaireacht ceaptha dó bíodh a fhios agat nach gceadaítear nochtadh, cóipeáil, scaipeadh nó úsáid an eolais agus/nó an chomhaid seo agus b'fhéidir d'fhéadfadh bheith mídhleathach.

The information in this email is confidential and may be legally privileged. It is intended solely for the addressee. Access to this email by anyone else is unauthorised. If you are not the intended recipient, any disclosure, copying, distribution or any action taken or omitted to be taken in reliance on it is prohibited and may be unlawful.

155

Owen Shinkwin

From: Tara Spain <tspain@nra.ie>
Sent: 13 August 2013 15:57
To: Owen Shinkwin
Subject: RE: Mahon Draft LAP

Thanks
Didn't see attachments.


T

Sent from Samsung Mobile

----- Original message -----
From: Owen Shinkwin <owen.shinkwin@nationaltransport.ie>
Date: 13/08/2013 14:36 (GMT+00:00)
To: Tara Spain <tspain@nra.ie>
Subject: RE: Mahon Draft LAP

As of July 2012.
I'm not aware of any additional analysis undertaken since then.

-----Original Message-----
From: Tara Spain [<mailto:tspain@nra.ie>]
Sent: 13 August 2013 13:55
To: Owen Shinkwin
Subject: RE: Mahon Draft LAP

Owen
They haven't sent us the plan.
I'm sending it to Aecom.
Do you have the final copy of the transport study?


Tara

Sent from Samsung Mobile

----- Original message -----
From: Owen Shinkwin <owen.shinkwin@nationaltransport.ie>
Date: 08/08/2013 13:40 (GMT+00:00)

To: Tara Spain <tspain@nra.ie>
Subject: RE: Mahon Draft LAP

Tara,

Just received the Draft Mahon LAP from Cork City Council, this morning.

Final date for submissions is 16th September.

As I'll be dealing with this before going on holidays, perhaps we can discuss issues of common interest/ concern, next week or the week after.

Owen

From: Tara Spain [<mailto:tspain@nra.ie>]
Sent: 07 August 2013 13:39
To: Owen Shinkwin
Subject: RE:

No problem

From: Owen Shinkwin
[<mailto:owen.shinkwin@nationaltransport.ie>] <[mailto:\[mailto:owen.shinkwin@nationaltransport.ie\]](mailto:[mailto:owen.shinkwin@nationaltransport.ie])>
Sent: 07 August 2013 12:52
To: Tara Spain
Subject: RE:

Thanks.

From: Tara Spain [<mailto:tspain@nra.ie>]
Sent: 07 August 2013 12:50
To: Owen Shinkwin
Subject:

087 1326104
He's in the Kilkenny office email him

Tara Spain
Senior Policy Advisor (Planning)
National Roads Authority
St. Martins House
Waterloo Road
Dublin 4
Direct Dial 0035316658849

NRA E-mail system: This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager.

I'm supporting The Gathering Ireland 2013. Go to

www.thegatheringireland.com<<http://www.thegatheringireland.com><<http://www.thegatheringireland.com><<http://www.thegatheringireland.com>>> and Be Part of it!

Owen Shinkwin

From: David Clements
Sent: 26 August 2013 15:53
To: Owen Shinkwin
Subject: Mahon LAP

Owen,

Some points on the Draft Mahon LAP as discussed:

- Overall I think we should be supportive of the general thrust of the LAP, particularly in relation to issues like retail development, transport and parking / mobility management
- The logic behind their statement on page 26 – paragraph 5 starting “best practice suggests...” is a bit odd. It’s saying that employment development should be accompanied by residential development in order to keep a particular ratio constant. We struggled with them on this point in the past and I think the statement should come out unless it is tied directly back to a core objective which aims to do this.
- I wouldn’t overplay or emphasise the role of land use policy in section 3.4.3 p. 37 in such a suburban context. It may certainly affect those living in new developments but the majority of trips into the future will be existing trips and to get a mode shift sufficient to meet, e.g. smarter travel targets, in a place like Mahon, either as an origin or destination will be very difficult.
- As mentioned above, we should explicitly state our support for the introduction of demand management measures and an area-wide Mobility Management plan. Objective T02 should mention “Workplace Travel Plans – A Guide for Implementers” as well.
- P. 39 Figure 3.5 and preceding paragraph – I’m not 100% sure what is meant by “pedestrian box” and why these particular locations have been identified and others not?
- Section 4 Sub-Area Strategies. It’s important that any local objectives identified are consistent with the emerging NTA / CCC strategic networks and a policy should state this. Although the projects are listed in a later section, I still think the principle should be stated from the outset.
- We would support much of what they say in the sub-area sections in relation to permeability and connectivity.
- P.84 need to clarify the 1st Car Parking Measure under Movement and Access – I know what they mean, I think, but there’s a mistake there
- P.84 – reference NTA Guidance on Mobility Management in the first bullet point under this topic.
- Section 5 – Table 5.3a has listed every project and an estimated cost. Perhaps we should consult with ROC or more likely Hugh, on whether we think they should remove the costs as it may be unwise to publish these at this point.

David

David Clements
 Land Use & Transport Planner
 Transport Planning and Capital Investment



Dún Scéine
 Iveagh Court
 Harcourt Lane

Dublin 2

Tel: + 353 (0)1 879 8305

Email: david.clements@nationaltransport.ie

Web: www.nationaltransport.ie

Supporting The Gathering Ireland 2013. Go to www.thegatheringireland.com and Be Part of it!

An t-Údarás Náisiúnta Iompair ag tacú le Tóstal Éireann 2013. Téigh chuig www.thegatheringireland.com agus Bí Páirteach ann!

Tá eolas sa teachtaireacht leictreonach seo a d'fhéadfadh bheith príobháideach nó faoi rún agus b'fhéidir go mbeadh ábhar rúnda nó pribhléideach ann. Is le h-aghaidh an duine/na ndaoine nó le h-aghaidh an aonáin atá ainmnithe thuas agus le haghaidh an duine/na ndaoine sin amháin atá an t-eolas. Tá cosc ar rochtain don teachtaireacht leictreonach seo do aon duine eile. Murab ionann tusa agus an té a bhfuil an teachtaireacht ceaptha dó bíodh a fhios agat nach gceadaítear nochtadh, cóipeáil, scaipeadh nó úsáid an eolais agus/nó an chomhaid seo agus b'fhéidir d'fhéadfadh bheith mídhleathach.

The information in this email is confidential and may be legally privileged. It is intended solely for the addressee. Access to this email by anyone else is unauthorised. If you are not the intended recipient, any disclosure, copying, distribution or any action taken or omitted to be taken in reliance on it is prohibited and may be unlawful.

Owen Shinkwin

From: Jeremy Ward <jeremy_ward@corkcity.ie>
Sent: 21 January 2014 13:26
To: Owen Shinkwin
Subject: Mahon LAP

Hi Owen

Just wondering if you intend to make a submission to the LAP process?

Jeremy Ward

Senior Executive Planner

Planning Policy Section
Strategic Planning and Economic Development Directorate
Floor 1, Civic Offices, Anglesea Street, Cork

T: 021-492-4450
E: jeremy_ward@corkcity.ie
Web: www.corkcity.ie



Cork City Council
Comhairle Cathrach Chorcaí

--

This email was virus checked by Edge\Guard. Managed by Trilogy Technologies.

157

Owen Shinkwin

From: Tara Spain <tspain@nra.ie>
Sent: 13 August 2013 13:55
To: Owen Shinkwin
Subject: RE: Mahon Draft LAP

Owen
They haven't sent us the plan.
I'm sending it to Aecom.
Do you have the final copy of the transport study?

→  ←
Tara

Sent from Samsung Mobile

----- Original message -----

From: Owen Shinkwin <owen.shinkwin@nationaltransport.ie>
Date: 08/08/2013 13:40 (GMT+00:00)
To: Tara Spain <tspain@nra.ie>
Subject: RE: Mahon Draft LAP

Tara,

Just received the Draft Mahon LAP from Cork City Council, this morning.
Final date for submissions is 16th September.
As I'll be dealing with this before going on holidays, perhaps we can discuss issues of common interest/ concern, next week or the week after.

Owen

From: Tara Spain [<mailto:tspain@nra.ie>]
Sent: 07 August 2013 13:39
To: Owen Shinkwin
Subject: RE:

No problem

From: Owen Shinkwin
[<mailto:owen.shinkwin@nationaltransport.ie>]
Sent: 07 August 2013 12:52
To: Tara Spain
Subject: RE:

Thanks.

From: Tara Spain [mailto:tspain@nra.ie]
Sent: 07 August 2013 12:50
To: Owen Shinkwin
Subject:

087 1326104
He's in the Kilkenny office email him

Tara Spain
Senior Policy Advisor (Planning)
National Roads Authority
St. Martins House
Waterloo Road
Dublin 4
Direct Dial 0035316658849

NRA E-mail system: This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager.

I'm supporting The Gathering Ireland 2013. Go to www.thegatheringireland.com<<http://www.thegatheringireland.com>> and Be Part of it!

158

Owen Shinkwin

From: Tara Spain <tspain@nra.ie>
Sent: 08 August 2013 14:01
To: Owen Shinkwin
Subject: RE: Mahon Draft LAP

I'm in shock it's not too bad

From: Owen Shinkwin [<mailto:owen.shinkwin@nationaltransport.ie>]
Sent: 08 August 2013 13:41
To: Tara Spain
Subject: RE: Mahon Draft LAP

Tara,

Just received the Draft Mahon LAP from Cork City Council, this morning.

Final date for submissions is 16th September.

As I'll be dealing with this before going on holidays, perhaps we can discuss issues of common interest/ concern, next week or the week after.

Owen

From: Tara Spain [<mailto:tspain@nra.ie>]
Sent: 07 August 2013 13:39
To: Owen Shinkwin
Subject: RE:

No problem

From: Owen Shinkwin [<mailto:owen.shinkwin@nationaltransport.ie>]
Sent: 07 August 2013 12:52
To: Tara Spain
Subject: RE:

Thanks.

From: Tara Spain [<mailto:tspain@nra.ie>]
Sent: 07 August 2013 12:50
To: Owen Shinkwin
Subject:

087 1326104

He's in the Kilkenny office email him

Tara Spain
Senior Policy Advisor (Planning)
National Roads Authority
St. Martins House
Waterloo Road

Dublin 4
Direct Dial 0035316658849

NRA E-mail system: This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager.

I'm supporting The Gathering Ireland 2013. Go to www.thegatheringireland.com and Be Part of it!

159

Owen Shinkwin

From: Tara Spain <tspain@nra.ie>
Sent: 08 August 2013 13:44
To: Owen Shinkwin
Subject: RE: Mahon Draft LAP

Maybe!

From: Owen Shinkwin [<mailto:owen.shinkwin@nationaltransport.ie>]
Sent: 08 August 2013 13:41
To: Tara Spain
Subject: RE: Mahon Draft LAP

Tara,

Just received the Draft Mahon LAP from Cork City Council, this morning.
Final date for submissions is 16th September.

As I'll be dealing with this before going on holidays, perhaps we can discuss issues of common interest/ concern, next week or the week after.

Owen

From: Tara Spain [<mailto:tspain@nra.ie>]
Sent: 07 August 2013 13:39
To: Owen Shinkwin
Subject: RE:

No problem

From: Owen Shinkwin [<mailto:owen.shinkwin@nationaltransport.ie>]
Sent: 07 August 2013 12:52
To: Tara Spain
Subject: RE:

Thanks.

From: Tara Spain [<mailto:tspain@nra.ie>]
Sent: 07 August 2013 12:50
To: Owen Shinkwin
Subject:

087 1326104

He's in the Kilkenny office email him

Tara Spain
Senior Policy Advisor (Planning)
National Roads Authority
St. Martins House
Waterloo Road

Dublin 4
Direct Dial 0035316658849

NRA E-mail system: This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager.

I'm supporting The Gathering Ireland 2013. Go to www.thegatheringireland.com and Be Part of it!

Owen Shinkwin

From: David Clements
Sent: 03 September 2013 11:00
To: Owen Shinkwin
Subject: RE: Mahon Draft LAP

Owen,

It won't go to Cork until you've reviewed it.

David

From: Owen Shinkwin
Sent: 03 September 2013 10:49
To: David Clements
Subject: RE: Mahon Draft LAP

David,

That's great.

As discussed with Mick yesterday, wouldn't mind seeing amended/ expanded version before it goes out, so can we hold off on sending it to Cork City Council until Monday 16th?

Thanks,

Owen

From: David Clements
Sent: 03 September 2013 10:41
To: Owen Shinkwin
Subject: RE: Mahon Draft LAP

Owen,

I will finalise the submission with the guys while you are on leave. Thanks for the draft comment, which will make up the vast majority of what we will say.

David

From: Owen Shinkwin
Sent: 03 September 2013 10:29
To: Roy OConnor; Marian Wilson; Michael MacAree; David Clements; Arlene Finn
Subject: RE: Mahon Draft LAP

All,

Sorry, almost forgot to send the draft on to you.
This is substantially complete but would benefit from additional, supporting points in detail.
Any comments, track changes, etc. please email to David and copying to myself.
Also, Roy, please note Section 5, Table 5.3a.

Regards,

Owen

From: Owen Shinkwin
Sent: 02 September 2013 15:43
To: Roy OConnor; Marian Wilson; Michael MacAree; David Clements; Arlene Finn
Subject: RE: Mahon Draft LAP

Sorry folks, the title of that email should of course have been "Mahon LAP".

From: Owen Shinkwin
Sent: 02 September 2013 15:41
To: Roy OConnor; Marian Wilson; Michael MacAree; David Clements; Arlene Finn
Subject: RE: Cork Metropolitan Area Update

Marian, Roy, Arlene,

As discussed briefly last week, a rather significant local area plan is being prepared for the Mahon area, which comprises a broad range of transport interventions, including new road links, the development of a pedestrian and cycle network, junction improvements providing greater priority for non-car modes, public transport measures including bus network and specific route proposals.

- Marian, your views in regards to proposed service pattern would be useful;
- Roy, your views of the Draft Plan in the context of the 5 year investment strategy objectives, including the strategic bus corridors, would be useful;
- Arlene, your views on Section 3.4.3 (mobility management) would be useful.

The context for this is the addressing of existing congestion and severance issues and the accommodation of an additional 11,700 jobs and 7000 population between 2006 (CASP baseline) and 2031.

I would be grateful if you would review those sections of the draft plan of most relevance to yourselves (Section 3.4 Transport, but a quick reference back to the development objective in Sections 3.1-3.3 would be useful to put the transport proposals in context). I've attached a link to the plan:

<http://www.corkcity.ie/services/strategicplanningeconomicdevelopment/localplanning/localareaplans/mahonlocalareaplan/>

Any comments you have, can you please email to David Clements over the next week or so, copying me in on the response.

An Draft submission by the NTA will follow on from this, which may also be of some help to you.

I can finalise the submission on my return from leave, taking your responses into consideration.

David, if, in light of Marian's, Roy's and Arlene's response, a short meeting would be merited, I would be grateful if you would do so.

Thank you in advance for your input.

Owen

Supporting The Gathering Ireland 2013. Go to www.thegatheringireland.com and Be Part of it!

An t-Údarás Náisiúnta Iompair ag tacú le Tóstal Éireann 2013. Téigh chuig www.thegatheringireland.com agus Bí Páirteach ann!

Tá eolas sa teachtaireacht leictreonach seo a d'fhéadfadh bheith príobháideach nó faoi rún agus b'fhéidir go mbeadh ábhar rúnda nó pribhléideach ann. Is le h-aghaidh an duine/na ndaoine nó le h-aghaidh an aonáin atá ainmnithe thuas agus le haghaidh an duine/na ndaoine sin amháin atá an t-eolas. Tá cosc ar rochtain don teachtaireacht leictreonach seo do aon duine eile. Murab ionann tusa agus an té a bhfuil an teachtaireacht ceaptha dó bíodh a fhios agat nach gceadaítear nochtadh, cóipeáil, scaipeadh nó úsáid an eolais agus/nó an chomhaid seo agus b'fhéidir d'fhéadfadh bheith midhleathach.

The information in this email is confidential and may be legally privileged. It is intended solely for the addressee. Access to this email by anyone else is unauthorised. If you are not the intended recipient, any disclosure, copying, distribution or any action taken or omitted to be taken in reliance on it is prohibited and may be unlawful.

Owen Shinkwin

From: Tara Spain <tspain@nra.ie>
Sent: 24 January 2014 15:56
To: Owen Shinkwin
Subject: RE: Mahon Jacobs Island

Brilliant!
 & I mean it
 T

From: Owen Shinkwin [<mailto:owen.shinkwin@nationaltransport.ie>]
Sent: 24 January 2014 15:52
To: Tara Spain
Subject: RE: Mahon Jacobs Island

Tara,

For your information, I've attached the NTA's submission on the Proposed Alterations to the Mahon Draft LAP and the Proposed Variation No. 11 to the City Development Plan.

Regards,

Owen

From: Tara Spain [<mailto:tspain@nra.ie>]
Sent: 21 January 2014 10:34
To: Hugh Creegan
Subject: Mahon Jacobs Island

Hugh

Good Morning

There is a significant issue arising in Cork City. The members have endorsed a variation/amendment to add 15,000sqm of office space to Jacobs Island South of the Mahon Interchange as well as bumping up the retail quota.

I have been working with Owen Shinkwin on the issues but I would highlight that it is a very unsustainable approach both to transport and land use planning in the City and could undermine any benefits both Authorities are undertaking in Cork.

Although the responses attached are very long, the key issues are as follows:

- Access to the Jacobs Island area is highly reliant on the Mahon Junction and N40.
- There is limited availability of public transport to the subject site to offset the significant reliance on private car borne trips which will be generated.
- The challenges in delivering a walking and cycling environment in the vicinity of the interchange, which delivers a competitive advantage to walking and cycling for local trip making to areas, north of the interchange;
- The proposed land uses are dependent upon a car borne catchment utilising the N40.

- There is already a significant supply of land with an employment zoning objective within Mahon capable of accommodating employment in excess of the employment targets for Mahon to 2031.
- A quantum scale of retail / commercial development has been previously assessed and refused by Bord Pleanála (PI 28.232675).
- Outstanding permission exists for commercial development including 1200sqm of retail space (PL28.232275) (please note not just convenience).
- There is also provision within a 5 minute drive time from existing established stores which unlike the proposal at Jacobs Island do not draw traffic through the N40 or Mahon Junction. There are more suitable sites for such retail development already within the proposed plan area (Avenue De Rennes).
- In general, the need to consolidate future development in areas which can provide the greatest support for higher levels of public transport service in Mahon and around the district centre core.

Finally, the City Council are also proposing a transport model to manage development quota. Although we have considerable reservation about the current modelling this provides an opportunity to "get it right". It is therefore important that a formal agreement needs to be reached between relevant transport authorities on the assumptions which form the basis, testing and management for the proposed development management model as early as possible prior to the lodgement of any planning application to avoid any future conflicts and facilitate better management.

I would be grateful for your support on the above issues which I have also raised with the DOE.

Regards

Tara

Tara Spain
Senior Policy Advisor (Planning)
National Roads Authority
St. Martins House
Waterloo Road
Dublin 4
Direct Dial 0035316658849

NRA E-mail system: This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager.

I'm supporting The Gathering Ireland 2013. Go to www.thegatheringireland.com and Be Part of it!

--

This email was virus checked by Edge\Guard. Managed by Trilogy Technologies.

--

This email was virus checked by Edge\Guard. Managed by Trilogy Technologies.

162

Owen Shinkwin

From: Jeremy Ward <jeremy_ward@corkcity.ie>
Sent: 21 January 2014 14:50
To: Owen Shinkwin
Subject: RE: Mahon LAP

Great. Thanks Owen.

Jeremy Ward

Senior Executive Planner

Planning Policy Section
Strategic Planning and Economic Development Directorate
Floor 1, Civic Offices, Anglesea Street, Cork

T: 021-492-4450
E: jeremy_ward@corkcity.ie
Web: www.corkcity.ie



Cork City Council
Comhairle Cathrach Chorcaí

From: Owen Shinkwin [<mailto:owen.shinkwin@nationaltransport.ie>]
Sent: 21 January 2014 14:19
To: Jeremy Ward
Subject: RE: Mahon LAP

Hi Jeremy,

Yes, we will be making a submission on the proposed alterations, over the next few days.

Regards,

Owen

From: Jeremy Ward [mailto:jeremy_ward@corkcity.ie]
Sent: 21 January 2014 13:26
To: Owen Shinkwin
Subject: Mahon LAP

Hi Owen

Just wondering if you intend to make a submission to the LAP process?

Jeremy Ward

Senior Executive Planner

Planning Policy Section
Strategic Planning and Economic Development Directorate
Floor 1, Civic Offices, Anglesea Street, Cork

T: 021-492-4450
E: jeremy_ward@corkcity.ie
Web: www.corkcity.ie



Cork City Council
Comhairle Cathrach Chorcaí

--
This email was virus checked by Edge\Guard. Managed by Trilogy Technologies.

Tá eolas sa teachtaireacht leictreonach seo a d'fhéadfadh bheith príobháideach nó faoi rún agus b'fhéidir go mbeadh ábhar rúnda nó pribhléideach ann. Is le h-aghaidh an duine/na ndaoine nó le h-aghaidh an aonáin atá ainmnithe thuas agus le haghaidh an duine/na ndaoine sin amháin atá an t-eolas. Tá cosc ar rochtain don teachtaireacht leictreonach seo do aon duine eile. Murab ionann tusa agus an té a bhfuil an teachtaireacht ceaptha dó bíodh a fhios agat nach gceadaítear nochtadh, cóipeáil, scaipeadh nó úsáid an eolais agus/nó an chomhaid seo agus b'fhéidir d'fhéadfadh bheith mídhleathach.

The information in this email is confidential and may be legally privileged. It is intended solely for the addressee. Access to this email by anyone else is unauthorised. If you are not the intended recipient, any disclosure, copying, distribution or any action taken or omitted to be taken in reliance on it is prohibited and may be unlawful.

--
This email was virus checked by Edge\Guard. Managed by Trilogy Technologies.

Owen Shinkwin

From: Jeremy Ward <jeremy_ward@corkcity.ie>
Sent: 24 January 2014 16:49
To: Owen Shinkwin
Subject: RE: Mahon LAP

Owen. Top chap. Just read it. Great stuff. Should make for a fun few weeks. If it weren't for the new CDP having to go out next week.

Thanks again.

Have a top weekend.

Jeremy

Jeremy Ward

Senior Executive Planner

Planning Policy Section
Strategic Planning and Economic Development Directorate
Floor 1, Civic Offices, Anglesea Street, Cork

T: 021-492-4450
E: jeremy_ward@corkcity.ie
Web: www.corkcity.ie



Cork City Council
Comhairle Cathrach Chorcaí

From: Owen Shinkwin [<mailto:owen.shinkwin@nationaltransport.ie>]
Sent: 24 January 2014 15:49
To: Jeremy Ward
Subject: RE: Mahon LAP

Jeremy,

For your information, the NTA has made on-line submissions on both the Mahon Proposed Alterations and Proposed Amendment No.11 to the City Development Plan.

Regards,

Owen

From: Jeremy Ward [mailto:jeremy_ward@corkcity.ie]
Sent: 21 January 2014 13:26

To: Owen Shinkwin
Subject: Mahon LAP

Hi Owen

Just wondering if you intend to make a submission to the LAP process?

Jeremy Ward

Senior Executive Planner

Planning Policy Section
Strategic Planning and Economic Development Directorate
Floor 1, Civic Offices, Anglesea Street, Cork

T: 021-492-4450
E: jeremy_ward@corkcity.ie
Web: www.corkcity.ie



Cork City Council
Comhairle Cathrach Chorcaí

--

This email was virus checked by Edge\Guard. Managed by Trilogy Technologies.

Tá eolas sa teachtaireacht leictreonach seo a d'fhéadfadh bheith príobháideach nó faoi rún agus b'fhéidir go mbeadh ábhar rúnda nó pribhléideach ann. Is le h-aghaidh an duine/na ndaoine nó le h-aghaidh an aonáin atá ainmnithe thuas agus le haghaidh an duine/na ndaoine sin amháin atá an t-eolas. Tá cosc ar rochtain don teachtaireacht leictreonach seo do aon duine eile. Murab ionann tusa agus an té a bhfuil an teachtaireacht ceaptha dó bíodh a fhios agat nach gceadaítear nochtadh, cóipeáil, scaipeadh nó úsáid an eolais agus/nó an chomhaid seo agus b'fhéidir d'fhéadfadh bheith mídhleathach.

The information in this email is confidential and may be legally privileged. It is intended solely for the addressee. Access to this email by anyone else is unauthorised. If you are not the intended recipient, any disclosure, copying, distribution or any action taken or omitted to be taken in reliance on it is prohibited and may be unlawful.

--

This email was virus checked by Edge\Guard. Managed by Trilogy Technologies.