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**Owen Shinkwin**

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**From:** planningpolicy@corkcity.ie  
**Sent:** 24 January 2014 15:30  
**To:** Owen Shinkwin  
**Subject:** Cork City Council - Submission/observation acknowledgement

Hugh Creegan

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

Date:

Our Ref: PA to Draft Mahon LAP14/1863

A Chara,

Re: Proposed Alteration to Draft Mahon Local Area Plan

I acknowledge receipt of your submission/observation received on on behalf of Hugh Creegan in relation to the Proposed Alteration to Draft Mahon Local Area Plan.

The contents of your submission/observation (including the summary outlined below) have been noted and will be taken into consideration.

**Summary of Submission**

**The National Transport Authority's comments on the proposed alterations to the Draft Mahon Local Area Plan 2013 are presented in the attached submission, dated 24th January 2014.**

Please quote the above reference in any further correspondence in this regard.

Yours faithfully,

Planning Policy Division

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**Owen Shinkwin**

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**From:** planningpolicy@corkcity.ie  
**Sent:** 16 September 2013 16:03  
**To:** Owen Shinkwin  
**Subject:** Cork City Council - Submission/observation acknowledgement

Hugh Creegan, Director of Transport Investment and Taxi Regulation

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

Date:

Our Ref: Draft Mahon LAP13/1807

A Chara,

Re: Draft Mahon Local Area Plan

I acknowledge receipt of your submission/observation received on on behalf of Hugh Creegan, Director of Transport Investment and Taxi Regulation in relation to the Draft Mahon Local Area Plan.

The contents of your submission/observation (including the summary outlined below) have been noted and will be taken into consideration.

**Summary of Submission**

**See attached submission.**

Please quote the above reference in any further correspondence in this regard.

Yours faithfully,

Planning Policy Division

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*The Gathering 2013 – be part of it*

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



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Mr Pat Ledwidge,  
Director of Services  
Strategic Planning and Economic Development Directorate,  
Cork City Council,  
City Hall,  
Cork

16<sup>th</sup> September 2013

**RE: National Transport Authority's submission on the Draft Mahon Local Area Plan 2013**

Dear Mr Ledwidge,

The National Transport Authority has the following comments to make on the Draft Mahon Local Area Plan.

**Overall View of the Draft LAP**

The Authority supports the overall thrust of the Draft LAP and its objective of seeking to accommodate substantial further population and employment growth within the boundaries of the City, on the basis of the following:

- The consolidation of development to address existing disconnected development patterns;
- Measures to reduce the severance effect associated with disconnected development and to improve local connectivity between residential, employment and local services through the development of walking and cycling networks and improved accessibility to public transport services;
- Improved public transport service levels into the LAP area and more extensive bus network coverage within the LAP area; and
- The targeted use of transport demand management measures to reduce the car mode share from its current high levels in the area incorporating site-specific and area-based mobility management, parking management, delivery of attractive and effective public transport, and the application of appropriately restrictive car parking standards.

In regards to the proposed hierarchy of retail centres, the Authority would also support the LAP's proposal to limit further retail floorspace growth at the existing District Centre (Mahon Point), whilst at the same time, seeking to achieve a more consolidated urban form, improved public realm and

better local accessibility within this area on the basis of a broader mix of land uses, including residential and non-retail commercial. The Authority also supports the development and/or consolidation of a number of neighbourhood centres, which would improve accessibility to a broader range of services at a more localised level.

Whilst supportive of the above objectives, there are a number of issues on which greater clarity is required at this stage:

### **Residential and Employment Development**

On examination of the tables in Sections 3 and 5 of the Draft LAP (Tables 3.2, 3.3., 5.1, 5.2 and the 'Tranches / Phasing Objectives' presented on p.93), various figures for Tranches 1a, 1b and 2, have been presented in relation to employment floorspace, employment totals, population totals and timeframes. Some of the totals appear to be inconsistent and there is reference to different baselines. These tables would benefit from some clarification, particularly in relation to the absence of sub-tranches 1a and 1b from section 3 and the use of the CASP 2006 baseline in section 3 only.

Clarity between the various tables in the plan would also be welcome in relation to the exact area to which each figure applies – whether Mahon constitutes the plan area or the 3 EDs should be clarified and be consistent for all figures expressed in the plan.

### **High Quality Bus Routes**

The development of a high quality east-west bus corridor serving Mahon and through the plan area is supported by the Authority. The precise alignment of this route is not yet known and will be subject to further assessment in the future. For this reason, the routings and infrastructure proposals shown in Figure 3.7 and listed in Table 3.7 are potentially premature pending the completion of the joint Cork City Council / NTA network study. The Authority recommends that Objective T04 Public Transport is amended to reflect this and to include a commitment to improve permeability by walking and cycling to bus stops along an emerging preferred route, and that the title of Table 3.7 is amended to "Potential Public transport measures".

### **The Location & Phasing of Development and BRT**

It is recommended that an objective which states that the phasing, density and location of development is clearly linked to the provision of public transport, is included in the plan. This relates to public transport route alignments, stop nodes and service levels which will emerge from the abovementioned network study, and proximity to/centrality within the district centre. Given the overriding importance attributed to BRT and high quality public transport services, the concentration and density of development within its local walking catchment will have an important bearing on the ability to deliver the public transport service levels envisaged.

### **The Population to Employment Ratio Rationale**

Reference is made in the Draft LAP to "best practice" suggesting that "as a guideline, the number of jobs/residents should not exceed 0.5:1 within any suburban centre planning area", the implication being that "new employment development should be accompanied by new residential development of an appropriate quantity to ensure that the uses remain broadly in balance and if they aren't then they are supported by appropriate transport measures". It would be beneficial if the rationale behind this was further clarified. While there may be examples of a 0.5:1 ratio applying elsewhere, it is unclear whether this constitutes "best practice". It implies that the job/labour force ratio would be

1:1 which might not normally be achievable or appropriate in a suburban location at the edge of a city.

It is noted, however, that Mahon is one of two suburban key development areas within the City Council area and as such, it is a matter of policy for the local authority to determine what implications this has for the ratio of population to employment under the LAP's preferred land use option and how this is arrived over time, taking the City Centre, other development areas and the necessary distribution and scale of development required to deliver BRT, into consideration.

## **Transport Demand Management Measures**

### *The National Road Network*

Demand management of the strategic road network, in this case the N40, is a critically important area of transport demand management which is likely to have a major bearing on both the feasibility of providing for a substantial increase in public transport services and the relative attractiveness of the Mahon area as a location for further commercial development, as compared to more central locations within the City. Whilst these are matters which go beyond the scope of any one local area plan and will need to be dealt with at a more strategic level, the impact of development-generated traffic at the Mahon Interchange will nonetheless need to be managed so as to minimise its impact on non-local, strategic traffic and to encourage the use of public transport and other non-car modes of transport.

For this reason, any N40 junction-specific traffic management measures proposed in the LAP would in themselves, represent an overly limited approach to managing the impact of development-generated traffic from the Mahon LAP area on the N40, and is likely to be limited in its impact. A corridor-based approach to the management of traffic using the N40 and other national roads within the Metropolitan Area would more likely deliver on the progressive shift from car to non-car modes in the Mahon area, which underpins the scale and density of development proposed and would likely contribute to greater development consolidation over time within areas that are most serviceable by public transport.

### *Parking*

In general, the application of maximum car parking standards at the local level should be determined on the basis of a combination of factors, all of which can be related to public transport accessibility, density gradient (which should itself be related to public transport accessibility) and centrality within the District Centre.

Where development is occurring on a phased basis, provision for the incremental reduction in the overall level of parking over time should be considered. This could also be linked to the area-wide mobility management plan approach, proposed in the Draft LAP. This would enable an appropriate level of parking to be provided corresponding to the public transport service level achievable at a particular point in time, whilst at the same time, supporting the basis for higher density, more public transport focused development over time.

As things stand, the least restrictive Zone 3 parking standards apply across the entire LAP area and there is currently no basis or criteria specified in the City Development Plan for how anything other than the maximum stated value could be applied. It is understood that the City and County Councils are currently seeking to develop a single set of maximum standards across the Metropolitan Area and a common approach to their application.



As such, the Authority recommends that the plan incorporates an objective which states that parking provision in Mahon will comply with standards and policies which emerge from the work being undertaken jointly by the two local authorities as part of the ongoing implementation of CASP.

#### Travel Planning / Mobility Management

The Authority welcomes the references to mobility management in the plan. It is recommended, however, that a stronger commitment is given to the implementation of an area-wide travel plan for Mahon by way of a clear objective replacing T02 which states that such a plan will be implemented in the lifetime of the LAP. This is of particular importance when viewed in the context of travel demand to and from Mahon that will not be served by the development of a high-quality east-west public transport corridor. i.e. local trips and orbital trips. The Authority would welcome the opportunity to work with the City Council on this matter and would welcome any forthcoming engagement in this regard.

#### Impact of Transport Demand Management on Non-Local Trip Patterns

One of the overriding influences of the impact of substantial further development in the Mahon LAP area on the strategic road network, the car / non-car mode split achievable for a range of trip purposes and the feasibility of delivering substantially higher level of public transport services and connectivity, will be the actual distribution of trips to and from the Mahon area. Current trips generated by this area currently demonstrate a widely dispersed pattern of movement and associated with this, a level of usage of the N40 and a correspondingly low correlation with current public transport service patterns. Whilst it is accepted that greater consolidation of population and employment growth within the City can provide the basis for higher levels of public transport and other non-car modes, a commitment to a broad package of transport demand management measures as outlined above, at CASP level, particularly in regards to the management of the strategic road network, would have a critical part to play in influencing both the distribution patterns and mode split of non-local trips over time.

#### **Development Proposals for Jacobs Island Lands**

The Authority has concerns in relation to significant further development occurring to the south of the N40 interchange. Those concerns can be summarised as follows:

- 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.

#### **Reference to Current NTA Guidance in the LAP**

It is suggested that reference is made, where relevant as part of the appropriate objectives, to NTA guidance as follows:

- Achieving Effective Workplace Travel Plans – A Guide for Local Authorities;
- Workplace Travel Plans – A Guide for Implementers;
- Toolkit for School Travel; and
- National Cycle Manual.

Other Guidelines of particular relevance to the LAP area, worth of referencing would include the DECLG's *Spatial Planning and National Roads*, particularly in regard to the evidence-based approach outlined in Section 2.4 and Section 2.13 (land use and transport planning checklist) .

#### **Transport Infrastructure Details**

As referred to above, the Authority is currently working with Cork City Council on the development of a walking, cycling and public transport networks for the Mahon corridor, with the primary objective of linking Mahon to the city centre by a frequent, reliable and competitive bus service. From this work, it is likely that a suite of infrastructural measures will emerge, whose development will be prioritised on the basis of their likely potential positive contribution to the above objective.

In view of this, the Authority recommends that section 5.2.1 and Tables 5.3a and 5.3b are amended to reflect the fact that decisions on specific investments have yet to be made. The proposals contained within these tables should therefore be presented as potential projects only. Moreover, specific estimated costs should be removed.

I trust that the views of the Authority will be taken into consideration in the finalisation of the Mahon Local Area Plan.

Yours sincerely,



**Hugh Creegan**  
*Director of Transport Investment and Taxi Regulation*



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Mr Pat Ledwidge,  
Director of Services  
Strategic Planning and Economic Development Directorate,  
Cork City Council,  
City Hall,  
Cork

24<sup>th</sup> January 2014

**RE: National Transport Authority's submission on the Proposed Alterations to the Draft Mahon Local Area Plan 2013**

Dear Mr Ledwidge,

The National Transport Authority (the Authority) wishes to reiterate its support for the overall thrust of the Draft LAP and its objective of seeking to accommodate substantial further population and employment growth within the boundaries of the City. In regards to the proposed alterations, comments are made under a number of headings, with their corresponding proposed alteration numbers:

**Jacobs Island (nos. 6, 64)**

The Authority would have serious concerns in relation to the location of significant additional development, particularly non-residential development to the south of the Mahon Interchange, as provided for under the above referenced alterations. These concerns were clearly articulated in the Authority's previous submission (dated 16<sup>th</sup> September 2013):

- *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.*

In addition, the following points in the Mahon STTS (Jacobs Island Additional Development Assessment) are noted:

- *It would have a negative impact on the ability to create a Central Mahon with a strong sense of place;*
- *... would undermine the development of office space in Central Mahon, as well as the City Centre, Docklands and Blackpool;*
- *... contrary to national planning and transportation policy, as it would be very car dependent. It would also be very contrary to the expectations of the NTA/NRA for Mahon, in that development would be car-borne and not support smarter travel and public transport. This could undermine the case and delivery of rapid transit to Cork.*

Furthermore, it is the Authority's understanding that there has been no scenario testing of the impact of the proposed non-residential development proposed, on the surrounding road network.

In conclusion, in light of the above concerns, the strategic importance of the N40 and the area's accessibility dependence on the Mahon Interchange, it is the recommendation of the Authority that the proposed alterations relating to the additional non-residential floorspace should be omitted and those relating to additional residential development should be reviewed, providing for a lower quantum of development.

#### **N40 Slip Road / access to Mahon Point (no. 66)**

The Authority would not support the provision of an additional link directly from the shopping centre onto the Mahon Interchange slip road and would consider any such proposal to be inconsistent with Section 2.7 of the Spatial Planning and National Roads Guideline for Planning Authorities (DoECLG, 2012) and other objectives within the LAP which seek to create a more consolidated, public transport-focused pattern of development. As such, the Authority would recommend that the proposed alteration no. 66 be omitted from the LAP.

#### **LAP Residential Development and Employment Targets (nos. 13, 14)**

The Authority is concerned that the overall quantum of residential and employment under Tranche 1 now proposed in the LAP is not consistent with that proposed in the Mahon STTS, particularly in regards to the scale of development now proposed on the Jacobs Island lands. It is therefore recommended that the STTS be revisited and revised to assess the impact of these changes.

#### **Population to Employment ratios (no. 15)**

The proposed alteration refers to the comparability of the stated current jobs to population ratio in the Mahon Transport Assessment Study Area (0.53:1) to "other key suburban development areas, with major retail components that have benefitted from analysis by the National Transport Authority in the Greater Dublin area". On this matter, the Authority wishes to clarify that information provided to the City Council was derived from an analysis of a number of suburban locations in the

Greater Dublin Area which revealed a wide variation in the jobs to population ratio and whose spatial definition also varied considerably.

As stated in the previous submission, it is a matter of policy for the local authority to determine what implications this has for the ratio of population to employment under the LAP's preferred land use option and how this is arrived over time, taking the City Centre and other development areas into consideration.

#### **Density and Location of Employment (no. 17)**

In relation to the density and location of employment development, the Authority would reiterate the importance of linking the phasing, density and location of development to the provision of public transport. This relates to public transport route alignments, stop nodes and service levels, and proximity to/centrality within the district centre. The extent to which the employment development focus shifts towards Mahon Technology Park and Mahon Point and the intensity of its development should be informed by the above considerations.

#### **Transport Demand Management, Including Parking Provision/ Management, Mobility Management, N40 Demand Management Study (nos. 26, 29, 30, 31, 32, 64)**

##### ***General Comment***

The Authority would emphasise the need for a range of complementary transport demand management measures, which serve to support clearly stated sustainable transport objectives, transport investment priorities, development location and development phasing. It is recommended that the above reference alterations are reviewed in with this in mind.

##### ***Car Parking***

In relation to the application of car parking standards and the provision of parking in new developments, the Authority would reiterate the approach set out in the previous submission, in particular, the need to apply maximum parking standards on the basis of *"a combination of factors, all of which can be related to public transport accessibility, density gradient (which should itself be related to public transport accessibility) and centrality within the District Centre"*. The Authority also recommended that *"Where development is occurring on a phased basis, provision for the incremental reduction in the overall level of parking over time should be considered. This could also be linked to the area-wide mobility management plan approach, proposed in the Draft LAP. This would enable an appropriate level of parking to be provided corresponding to the public transport service level achievable at a particular point in time, whilst at the same time, supporting the basis for higher density, more public transport focused development over time"*. As things stand, there is currently no basis or criteria specified in the City Development Plan as to how anything other than the maximum stated value could be applied. The current parking policy inclusive of the proposed alteration, does not provide a basis for applying the above approach.

##### ***Mobility Management***

In relation to the development of an area-wide approach to mobility management, the proposed alteration is noted.

##### ***No. 32 (Development Management and Traffic Impact)***

Whilst the Authority would welcome the addition of this alteration, the cumulative impact assessment of development related trip generation should not be subject to its incremental

implementation through the development management process. Rather, as stated above, the current development assumptions need to be properly tested at this stage, through the Mahon STTA, which should in turn, inform the overall scale, location, intensity, uses/ mix of uses and phasing of development.

**No. 64 (Car Parking Measures)**

The Authority would agree that complementary parking management measures on surrounding roads should be introduced in the event that parking charges are introduced at the shopping centre. On-street parking management would in any case be appropriate in an area subject to development intensification over time.

In regards to the maintenance of existing car parking levels at their present maximum levels, this does not appear to be consistent with the LAP's objective of creating a more locally-focused district centre with improved levels of accessibility by walking and cycling at the local level and by public transport from within its wider catchment. It would also imply that any parking spaces lost through the redevelopment of existing surface car parking would have to be replaced for existing retail uses.

**Mahon Corridor Study/ Public Transport Corridor development (nos. 34, 50, 65)**

In regards to the development and improvement of a defined bus-based public transport corridor, linking Mahon with the City Centre and other bus corridors defined in Cork City Council's 5 Year Transport Investment Framework, the Authority will continue to work with the City Council on their development over time, on the basis of clear, complementary and evidence-based integrated land use and transport policy objectives.

I trust that the views of the Authority will be taken into consideration in the finalisation of the Mahon Local Area Plan.

Yours sincerely,

  
Hugh Creegan  
**Director of Transport Investment and Taxi Regulation**

## NTA Comments on the Mahon Strategic Transport and Traffic Assessment

2<sup>nd</sup> October 2012

Regarding the work undertaken and presented in the Strategic Transport and Traffic Assessment, the points presented below outline the issues which the NTA recommends be taken into consideration at this stage in the preparation of the Mahon Local Area Plan.

Broadly, the issues raised focus on:

- Consistency with current government guidelines as presented in Spatial Planning and National Roads;
- Development Quantums, Modal Split Assumptions, Traffic Impact Assumptions, and Demand Management Measures;
- Development Location and Phasing;
- Jacob's Island Lands; and
- Population to Employment Ratio issue

### Reference to and Compliance with Current Government Guidelines

In making the case for further large scale development at a location adjacent to a national road interchange, it is strongly recommended that this is presented in the context of its consistency with current government guidelines as presented the DOELG's *Spatial Planning and National Roads*, particularly in regard to the evidence-based approach outlined in Section 2.4 and Section 2.13 (land use and transport planning checklist).

### Development Quantums, Modal Split Assumptions, Traffic Impact Assumptions, and Demand Management Measures

It is stated in the TTA that the ***impact that the preferred Land Use option (Option 3) will have on the Mahon Interchange*** will be 'marginal' under Tranch 1 and negligible under Tranch 2.

Under Tranch 1, an increase in traffic volumes on the N40 of 4% and 2%, west and east of the Mahon Interchange has been assumed and is described as having a marginal traffic impact. The further impact of development associated with Tranch 2 is described as being insignificant.

It is not clear from the TTA, how these assumptions relate to the future year performance of the interchange and whether these increases relate to the peak period or AADT.

The impact on the interchange is also related to the localisation of a higher percentage of a larger quantum of employment trips (and associated modal shift to non-car modes) and the greater use of public transport for non-local trips, enabled by improvements in public transport services levels.

Greater clarity is required on what trip distribution patterns and modal splits underpin this assumption:

In the case of Tranch 1, no specific information has been provided on the associated trip distribution, but the mode split assumption (55% car) does appear to be derived from the mode shares that pertain to Dublin City for trips within 5km in length, in combination with the introduction of restrictive car parking standards and a doubling of bus services. However, it is not clear what percentage of total peak period trips would be within 5km in length and what mode split would apply to such trips. Also, it is not clear how the trip distribution patterns and public transport service patterns pertaining to Dublin City could justifiably be used as a representative comparator for Mahon, given its peripheral location within Cork City, its much smaller scale and the far more limited public transport network coverage that would apply, as compared to Dublin City.

In the case of Tranch 2 (full build-out), assumed traffic impact has been based on the assumption that a 55% non-car mode share will be achieved, related to which, the BRT as proposed in CATS would be in place, delivering a 3-5 minute service frequency during the peak periods. The 55% assumption appears to be based on the 'Smarter Travel' policy objective, in combination with the same Dublin City-derived, rather than on a model-based output. Further explanation is required on how this mode split would be achieved.

*In regard to BRT*, it is also important to note that its delivery would be contingent on a high level of growth in population and employment at various locations along its route between Ballincollig and Mahon. It is understood that these (CATS) growth assumptions exceed those provided for in the CASP Update and would be contingent on much higher levels of growth in the Cork Metropolitan Area than currently apply and a far higher level of growth concentration than CASP currently provides for. This growth distribution issues raises another important question – in order to enable the delivery of the proposed BRT route and the 3-4 minute service frequencies referred to in the TTA, which key development areas within the BRT corridor would need to be given the highest level of priority. It is assumed that the most centralised the distribution of future employment growth would deliver the greatest benefit in terms of corridor demand. Conclusion – the LAP-level development assumptions should not be taken in isolation of the higher level development distributions required to deliver their contingent public transport infrastructure/ services.

A reduced Tranch 2 build out (30%) is proposed, in the absence of BRT. Again, greater clarity is required on what trip distribution, mode split and associated traffic impact assumptions relate to this development scenario and the extent to which non-local employment trip patterns will relate to the public transport service patterns on which the non-car mode shares are largely contingent.

Greater clarity is required on what impact, **transport demand management (TDM) measures** such as restricted parking standards and area-based mobility management are likely to have on modal split for employment related trips. On the issue of parking standards, the standards applicable have not been specified in the TTA nor has the manner in which they would be applied. In any case, the ability to deliver a reduced standard would appear to be contingent on decisions which are beyond the scope of the LAP, i.e. reference to Metropolitan-wide parking standards.



***Demand management of the strategic road network*** is another important area of TDM which could have a major bearing on both the feasibility of providing for a substantial increase in public transport services and relative attractiveness of the Mahon area as a location for further commercial development (as compared to more central locations). Whilst these are matters which go beyond the scope of the subject LAP and would need to be dealt with at a more strategic level, the impact of development-generated traffic at any one interchange on the N40 will nonetheless need to be managed to as to minimise its impact on strategic traffic and to encourage the use of alternative modes of transport.

However, junction-specific traffic management measures still would represent an overly limited approach to strategic road network TDM and would ultimately be limited in its impact. A corridor-based approach to the management of traffic using the national road network within the Metropolitan Area would more likely deliver on the mode split assumptions underpinning the Mahon TTA's preferred development option and would likely contribute to greater development consolidation over time within areas that are serviceable by public transport.

### **Development Location and Phasing**

The concerns raised above, may, in part, be addressed with the following approach to the location and phasing of development within the LAP area:

- Linking the phasing, density and location of development to prescribed public transport route alignments, stop nodes, service levels and centrality within the district centre focal point (the basis for which should itself be determined by public transport accessibility and accessibility within a defined local walking and cycling catchment). Given the overriding importance attributed to BRT in the development of the Mahon area, the concentration of development within its local walking catchment would have an important bearing on the ability to deliver the public transport service levels envisaged. This would be supported by consolidated, finer grain development forms within public transport corridors, within which higher levels of permeability and reduced severance levels can be achieved;
- Linking the level of car parking provision for non-residential uses to public transport service levels. In general, the application of maximum car parking standards at the local level should be determined on the basis of a combination of factors, all of which can be related to public transport accessibility and centrality with the district centre – density, mix of uses, granularity of development form and levels of priority for walking, cycling and public transport.
- Where development is occurring on a phased basis, provision for the incremental reduction in the overall level of parking over time should be considered. This could also be linked to the area-wide mobility management plan approach, proposed in the TTA. This would enable an appropriate level of parking to be provided corresponding to the public transport service level achievable at a particular point in time, whilst at the same time, supporting the basis for higher density, more public transport focused development over time.

### **Jacob's Island Lands (Option 3a)**

The overriding consideration and constraints that should pertain to significant further development in this area can be summarised as follows:

- Its physical separation from Mahon by the N40 Mahon Interchange and the resultant local trips which would be loaded onto the interchange;
- The challenges in 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;
- As referred to above, the need to consolidate future development in areas which provide the greatest support for higher levels of public transport service in Mahon and around a clearly defined district centre core.

### **Population to Employment Ratio Issue (as referenced on p.31 of TTA)**

#### Clarification of the ratios set out in section 4.3.8 of the Mahon TTA

In relation to the ratios in section 4.3.8, the 0.33 figure is derived from an analysis of the number of jobs in major suburban employment locations which are filled by local labour force, that is, in an area with say, 5,000 jobs, 1,650 of them are likely to be taken up locally. The other two thirds of the local labour force would therefore travel to other employment destinations. This figure therefore is not related to the ratio of local jobs to local population.

The 0.5 figure would be more applicable to be used as a jobs : labour force ratio, rather than as a jobs : population ratio as the latter would roughly imply a ratio of unity between local labour force and local employment. This would not be the case in most suburban locations. It is noted that Mahon is one of two suburban key development areas within the City Council area and as such, it is a matter of policy for the local authority to determine what implications this has for the ratio of population to employment under a preferred land use option. The data from Dublin shows a fairly wide variation in this regard depending on mainly the scale and nature of employment planned.

Overall, the NTA would like to clarify that the ratios do not comprise "guidance" from the NTA, informal or otherwise, in terms of good planning policy. Rather, data has been provided from the 2006 Census, which Cork City Council may wish use as a guide in planning for the Mahon area, on the basis of the Council's own vision for Mahon - among the key considerations being its future employment function within the wider Metropolitan Area.

It is recommended that an explanation along the following lines be included:

*"Table 4-7 sets out the population: employment ratio for Mahon from the 2006 Census. Data from select suburban areas in Dublin indicate a range from 0.24 to 0.54 generally. It is the policy of the City Council that the ratio for the Mahon area as defined would be 0.xx:1, on the basis of its intended employment function."*

**The NTA would be happy to meeting with Cork City Council to further discuss the above points.**

**Congratulations!**

You have successfully made a submission to the following plan:

**Proposed Alteration to Draft Mahon Local Area Plan**

The following details have been recorded as part of your submission:

**Name of Interested Party:** Hugh Creegan

**Title of Submission:**

**Summary of Submission:** The National Transport Authority's comments on the proposed alterations to the Draft Mahon Local Area Plan 2013 are presented in the attached submission, dated 24th January 2014.

**Documents attached:**

1: National Transport Authority submission on the Proposed Alterations to the Draft Mahon LAP 2013.pdf

**Reference:** PA to Draft Mahon LAP14/1863

An e-mail acknowledgement has been sent to the e-mail address supplied. You are recommended to print this page and retain it for your records.

In the event that you need to contact the City Council concerning this submission, please telephone: (021) 492 4086 or (021) 492 4757.

Thank you for making a submission; the issues raised will be taken into account by the City Council.

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Planning Policy Division  
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Mr Pat Ledwidge,  
Director of Services  
Strategic Planning and Economic Development Directorate,  
Cork City Council,  
City Hall,  
Cork

24<sup>th</sup> January 2014

**RE: National Transport Authority's submission on the Proposed Alterations to the Draft Mahon Local Area Plan 2013**

Dear Mr Ledwidge,

The National Transport Authority (the Authority) wishes to reiterate its support for the overall thrust of the Draft LAP and its objective of seeking to accommodate substantial further population and employment growth within the boundaries of the City. In regards to the proposed alterations, comments are made under a number of headings, with their corresponding proposed alteration numbers:

**Jacobs Island (nos. 6, 64)**

The Authority would have serious concerns in relation to the location of significant additional development, particularly non-residential development to the south of the Mahon Interchange, as provided for under the above referenced alterations. These concerns were clearly articulated in the Authority's previous submission (dated 16<sup>th</sup> September 2013):

- *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.*

In addition, the following points in the Mahon STTS (Jacobs Island Additional Development Assessment) are noted:

- *It would have a negative impact on the ability to create a Central Mahon with a strong sense of place;*
- *... would undermine the development of office space in Central Mahon, as well as the City Centre, Docklands and Blackpool;*
- *... contrary to national planning and transportation policy, as it would be very car dependent. It would also be very contrary to the expectations of the NTA/NRA for Mahon, in that development would be car-borne and not support smarter travel and public transport. This could undermine the case and delivery of rapid transit to Cork.*

Furthermore, it is the Authority's understanding that there has been no scenario testing of the impact of the proposed non-residential development proposed, on the surrounding road network.

In conclusion, in light of the above concerns, the strategic importance of the N40 and the area's accessibility dependence on the Mahon Interchange, it is the recommendation of the Authority that the proposed alterations relating to the additional non-residential floorspace should be omitted and those relating to additional residential development should be reviewed, providing for a lower quantum of development.

#### **N40 Slip Road / access to Mahon Point (no. 66)**

The Authority would not support the provision of an additional link directly from the shopping centre onto the Mahon Interchange slip road and would consider any such proposal to be inconsistent with Section 2.7 of the Spatial Planning and National Roads Guideline for Planning Authorities (DoECLG, 2012) and other objectives within the LAP which seek to create a more consolidated, public transport-focused pattern of development. As such, the Authority would recommend that the proposed alteration no. 66 be omitted from the LAP.

#### **LAP Residential Development and Employment Targets (nos. 13, 14)**

The Authority is concerned that the overall quantum of residential and employment under Tranche 1 now proposed in the LAP is not consistent with that proposed in the Mahon STTS, particularly in regards to the scale of development now proposed on the Jacobs Island lands. It is therefore recommended that the STTS be revisited and revised to assess the impact of these changes.

#### **Population to Employment ratios (no. 15)**

The proposed alteration refers to the comparability of the stated current jobs to population ratio in the Mahon Transport Assessment Study Area (0.53:1) to "other key suburban development areas, with major retail components that have benefitted from analysis by the National Transport Authority in the Greater Dublin area". On this matter, the Authority wishes to clarify that information provided to the City Council was derived from an analysis of a number of suburban locations in the

Greater Dublin Area which revealed a wide variation in the jobs to population ratio and whose spatial definition also varied considerably.

As stated in the previous submission, it is a matter of policy for the local authority to determine what implications this has for the ratio of population to employment under the LAP's preferred land use option and how this is arrived over time, taking the City Centre and other development areas into consideration.

#### **Density and Location of Employment (no. 17)**

In relation to the density and location of employment development, the Authority would reiterate the importance of linking the phasing, density and location of development to the provision of public transport. This relates to public transport route alignments, stop nodes and service levels, and proximity to/centrality within the district centre. The extent to which the employment development focus shifts towards Mahon Technology Park and Mahon Point and the intensity of its development should be informed by the above considerations.

#### **Transport Demand Management, Including Parking Provision/ Management, Mobility Management, N40 Demand Management Study (nos. 26, 29, 30, 31, 32, 64)**

##### ***General Comment***

The Authority would emphasise the need for a range of complementary transport demand management measures, which serve to support clearly stated sustainable transport objectives, transport investment priorities, development location and development phasing. It is recommended that the above reference alterations are reviewed in with this in mind.

##### ***Car Parking***

In relation to the application of car parking standards and the provision of parking in new developments, the Authority would reiterate the approach set out in the previous submission, in particular, the need to apply maximum parking standards on the basis of *"a combination of factors, all of which can be related to public transport accessibility, density gradient (which should itself be related to public transport accessibility) and centrality within the District Centre"*. The Authority also recommended that *"Where development is occurring on a phased basis, provision for the incremental reduction in the overall level of parking over time should be considered. This could also be linked to the area-wide mobility management plan approach, proposed in the Draft LAP. This would enable an appropriate level of parking to be provided corresponding to the public transport service level achievable at a particular point in time, whilst at the same time, supporting the basis for higher density, more public transport focused development over time"*. As things stand, there is currently no basis or criteria specified in the City Development Plan as to how anything other than the maximum stated value could be applied. The current parking policy inclusive of the proposed alteration, does not provide a basis for applying the above approach.

##### ***Mobility Management***

In relation to the development of an area-wide approach to mobility management, the proposed alteration is noted.

##### ***No. 32 (Development Management and Traffic Impact)***

Whilst the Authority would welcome the addition of this alteration, the cumulative impact assessment of development related trip generation should not be subject to its incremental

implementation through the development management process. Rather, as stated above, the current development assumptions need to be properly tested at this stage, through the Mahon STTA, which should in turn, inform the overall scale, location, intensity, uses/ mix of uses and phasing of development.

**No. 64 (Car Parking Measures)**

The Authority would agree that complementary parking management measures on surrounding roads should be introduced in the event that parking charges are introduced at the shopping centre. On-street parking management would in any case be appropriate in an area subject to development intensification over time.

In regards to the maintenance of existing car parking levels at their present maximum levels, this does not appear to be consistent with the LAP's objective of creating a more locally-focused district centre with improved levels of accessibility by walking and cycling at the local level and by public transport from within its wider catchment. It would also imply that any parking spaces lost through the redevelopment of existing surface car parking would have to be replaced for existing retail uses.

**Mahon Corridor Study/ Public Transport Corridor development (nos. 34, 50, 65)**

In regards to the development and improvement of a defined bus-based public transport corridor, linking Mahon with the City Centre and other bus corridors defined in Cork City Council's 5 Year Transport Investment Framework, the Authority will continue to work with the City Council on their development over time, on the basis of clear, complementary and evidence-based integrated land use and transport policy objectives.

I trust that the views of the Authority will be taken into consideration in the finalisation of the Mahon Local Area Plan.

Yours sincerely,

  
Hugh Creegan  
**Director of Transport Investment and Taxi Regulation**