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## Owen Shinkwin

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**From:** Owen Shinkwin  
**Sent:** 30 August 2013 18:40  
**To:** oshinkwin@yahoo.com  
**Subject:** NTA comments on the Mahon Strategic Transport and Traffic Assessment (June 2012)  
**Attachments:** NTA comments on the Mahon Strategic Transport and Traffic Assessment (June 2012).docx

# 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.**

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**Owen Shinkwin**

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**From:** Owen Shinkwin  
**Sent:** 17 June 2014 12:22  
**To:** 'Tara Spain'  
**Subject:** NTA submission on the Draft Cork City Development Plan 2015-2021 (draft2)  
**Attachments:** NTA submission on the Draft Cork City Development Plan 2015-2021 (draft2).docx

Tara,

If you have a moment, can you let me know your views on this draft.

Thanks,

Owen

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

17<sup>th</sup> June 2014

**RE: National Transport Authority's submission on the Draft Cork City Development Plan 2015-2021**

Dear Mr Ledwidge,

The Authority notes the contents of the Draft Cork City Development Plan (Draft Plan) and would support its overall objectives as presented in the Core Strategy, as providing the basis for the consolidation of Cork Metropolitan Area-generated population and employment growth within Cork City.

The Authority's comments on the Draft Plan are focused on a number of policy areas, which are considered to be critical to achieving:

- Greater consolidation of future population and employment location; and
- Integrated Land Use and Transport Planning, as manifested by:
  - the optimisation of investment by the City Council, NTA and other agencies in transport infrastructure,
  - improved and more effective public transport services,
  - improved accessibility to jobs and services, and
  - a reduction in car dependency.

With this in mind, particular attention is given to the following elements of the Draft Plan:

- Development Location, Development Density and Integration with Investment in Transport Infrastructure and Public Transport Services;
- Transport and Mobility, Transport Investment, Parking Policy/ Parking Standards.



# **Development Location, Development Density and Integration with Investment in Transport Infrastructure and Public Transport Services**

## **Chapter 2 – Core Strategy**

### ***Prioritisation of Residential Development Locations to Support Investment in Sustainable Transport***

The Authority would support the prioritisation of development in locations which facilitate development consolidation within defined public transport corridors and delivered through the preparation of local area plans for such locations. Within those plans, appropriate residential and other development densities, mix of uses, layouts, sequencing and contingent supporting transport networks and services can be determined. This type of mechanism for the prioritisation of development at the City and local levels is essential to inform the distribution and sequencing of population growth provided for in the Core Strategy and as such will have a critical bearing on the ability to optimise investment by the Council, NTA and other agencies in the requisite supporting transport infrastructure, the delivery of improved and more effective public transport services, the greater consolidation of future residential development along public transport corridors and the achievement of higher development densities, based on public transport accessibility.

### ***Residential Density***

In regards to housing density, densities could be determined on the basis of clearly presented public transport network and public transport service level objectives. They should not be determined solely on the basis of the capacity and frequency of existing public transport services, as such an approach could serve to undermine the basis for future investment in public transport infrastructure and services, and the ability to deliver improved levels of service in existing priority investment corridors.

It is therefore recommended that densities are determined through a process which combines the prioritisation of development locations, or corridors with the prioritisation of investment in public transport infrastructure/ services.

### ***Employment location, Employment Intensity***

The Authority would support the prioritisation of future employment development on the basis of clearly defined employment types combined with associated locational, operational and employee accessibility requirements. Whilst this approach is broadly reflected in the Draft Plan's Core Strategy and policies on Employment, a closer alignment with transport policy and transport investment prioritisation over the period of the Plan, is required.

In relation to the prioritisation of locations for development, the Authority would support the use of local area plans as a means of determining the appropriate location, sequencing, scale, employment type, layout, supporting transport infrastructure and requisite public transport service levels.

## **Chapter 14 - Suburban Area Policies (Jacobs Island)**

In regards to paragraph 14.6, the Authority would have particular concerns with the Draft Plan's provision for up to 15,000 sq.m of mixed use development at Jacobs Island, including business and office space, the following basis:

- Its physical separation from Mahon by the N40 Mahon Interchange and the resultant local trips which would be loaded onto the interchange and the national road network;
- 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.

As stated in the Mahon STTS (Jacobs Island Additional Development Assessment):

- *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.*

As such, the Authority does not support this provision and would consider it to present a risk to future investment in transport infrastructure and public transport services in Cork City.

## **Transport and Mobility, Transport Investment, Parking Policy/ Parking Standards**

### **Chapter 5 – Transportation, Chapter 16 – Development Management (Parking Standards)**

#### ***Transport and Mobility, Parking Policy, Parking Standards***

One of the principal challenges for the Development Plan in framing its transport and mobility policies is to encapsulate all of what is required to deliver an integrated strategy for transport investment, transport demand management, development location, development intensity and development type.

This needs to be undertaken on the basis of clearly defined objectives relating to mode split for a range of trip purposes; accessibility to key development areas and strategic economic assets such as airport and port facilities and the use of and protection of transport assets for clearly defined purposes (public transport corridors, national roads for strategic traffic, etc.).

#### ***Consolidation of Development within public transport corridors***

As previously stated, the achievement of this objective will be contingent on the Council's prioritisation of development within clearly defined public transport corridor locations and (through

the mechanism of the local area plans), the application of development densities, land uses, parking standards and the achievement of local connectivity/ permeability which maximises the attractiveness and utility of public transport, walking and cycling over the use of the car, for a range of trip purposes.

This can provide the basis, over time, for higher services frequencies, greater integration between services and a higher level of public transport accessibility within the City, its environs and across the Metropolitan Area.

#### ***Transport Demand Management, Parking Policy / Parking Standards***

On the closely related issues of transport demand management, the development of an integrated transport system and parking provision, the CASP Update report (Cork Area Strategic Plan – Strategy for Additional Economic and Population Growth – An Update, July 2008), states that the *“Effective implementation of development control policies and in particular those elements that influence travel demand including densities and local transport accessibility and parking standards, have a critical bearing on the viability and success of the integrated transport system”*. The CASP Update goes on to say that *“The implementation of effective development control in supporting public transport policies is critical as transport is a derived demand directly influenced by the scale, location and density of developments and in particular by the supply of parking and alternative transport choices”*. Finally, the CASP Update emphasises the need for a co-ordinated parking policy between the two local authorities (Cork City and County councils).

In light of the CASP Update’s recommendations, the Authority would emphasise the benefits of a achieving a common, agreed approach to car parking standards and their application between the City and County councils as part of their respective development plan reviews and applied within the Cork City and Environs areas.

It is recommended that parking standards and their application (including the manner in which the zones are defined) is informed by current investment priorities in public transport infrastructure and services for the City, over the period of the development plan and beyond.

Whilst the delivery of this investment and the associated ability to improve public transport services will be contingent on the availability of requisite funding, including that of the Regional Cities’ 5 Year Transport Investment Framework, a greater degree of certainty on the location of public transport investment priorities, in combination with complementary detailed statutory plans at the local level could provide the basis for the most appropriate application of parking standards (within the stated maximum values) which reflect public transport service level objectives and appropriate development densities and mix of uses. In the case of large-scale developments, an incremental reduction in parking provision could be considered as part of a development phasing process.

#### **Summary**

In summary, the Authority would emphasise the need for:

- A stronger emphasis on sequential expansion, focused on the most central parts of the City Council area, Docklands, existing district centres and those locations along strategic public transport corridors;
- A clear link between development density and public transport provision, including the transition to higher development densities within each centre and along defined strategic public transport corridors in order to effect a reduction in trip lengths and to provide a stronger demand basis for higher frequency public transport services over time;
- A clear policy which explicitly supports the transport user hierarchy as a means of providing a coherent basis for future investment in transport infrastructure. This considers transport user needs in the following order:
  1. Pedestrians
  2. Cyclists
  3. Public transport users
  4. Freight, delivery and waste vehicles
  5. Private vehicles users
- Maximum Parking standards for non-residential development which are linked to centrality and accessibility to public transport;

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

Yours sincerely,

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

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**Owen Shinkwin**

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**From:** Owen Shinkwin  
**Sent:** 16 September 2013 14:54  
**To:** Michael MacAree  
**Subject:** NTA submission on the Draft Mahon Local Area Plan 2013 Rev2  
**Attachments:** NTA submission on the Draft Mahon Local Area Plan 2013 Rev2.docx



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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 on the basis that it seeks 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 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". The rationale behind this requires further clarity. 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 ~~would~~ 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**

### 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.

### Car Parking Measures (p.84 of the Draft LAP)

Further explanation is required on how the measures as outlined could be implemented over time, particularly in regard to area-based parking caps. In addition, the first measure appears to be incomplete.

### The National Road Network

Demand management of the strategic road network, in this case the N40, is another 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.

#### 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 ~~is fully willing to assist Cork City Council~~ 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 Cork Metropolitan Area 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.

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

The Authority would not support ~~any~~ significant further development occurring to the south of the N40 interchange. 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 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 recommended that reference is made, 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 ~~precise-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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**Owen Shinkwin**

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**From:** Owen Shinkwin  
**Sent:** 16 September 2013 15:27  
**To:** Hugh Creegan; Michael MacAree  
**Subject:** NTA submission on the Draft Mahon Local Area Plan 2013 Rev2  
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Mr Pat Ledwidge,  
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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 on the basis that it seeks 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 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". The rationale behind this requires further clarity. 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~~ would 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.

#### Car Parking Measures (p.84 of the Draft LAP)

Further explanation is required on how the measures as outlined could be implemented over time, particularly in regard to area-based parking caps. In addition, the first measure appears to be incomplete.

#### The National Road Network

~~Demand management of the strategic road network, in this case the N40, is another 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.~~

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#### 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 ~~is fully willing to assist Cork City Council~~ 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~~

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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 would not support any-significant further development occurring to the south of the N40 interchange. 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 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 recommended that reference is made, 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;
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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 ~~precise~~-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,

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

**Owen Shinkwin**

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**From:** Owen Shinkwin  
**Sent:** 17 September 2013 17:53  
**To:** 'Tara Spain'  
**Subject:** NTA submission on the Mahon Draft LAP  
**Attachments:** National Transport Authority submission on the Mahon Draft Local Area Plan

Tara,

For your information, see attached, the NTA's submission on the Mahon Draft LAP.

Regards,

**Owen Shinkwin**

**Údarás Náisiúnta Iompair**

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Dún Scéine  
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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

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Yours sincerely,



**Hugh Creegan**

**Director of Transport Investment and Taxi Regulation**