

Owen Shinkwin

From: Owen Shinkwin
Sent: 19 April 2013 17:32
To: David Clements
Subject: FW: Draft Mahon LAP

From: Jeremy Ward [mailto:jeremy_ward@corkcity.ie]

Sent: 19 April 2013 17:12

To: Owen Shinkwin

Subject: Draft Mahon LAP

Hi Owen

I hope that you are well.

A quick email to say that the Draft Mahon LAP will be hitting the bookshops soon (probably w/c 13 May 2013 after prescribed body consultations on SEA / AA). It's been to Council and is almost good to go. As soon as I have a final version I will send it on to you before the formal notification is issued – hopefully be end of next week.

Talk soon.

Kind regards

Jeremy

Regards

Jeremy Ward

Senior Executive Planner

Planning Policy Section

Strategic Planning + Economic Development Directorate,

Cork City Council, City Hall, Cork

T: 021-492-4450

F: 021-492-4712

E: jeremy_ward@corkcity.ie

I: www.corkcity.ie

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Draft Minute

Cork City Council
Comhairle Cathrach Chorchai
City Hall
Cork



Planning Policy Section
Planning + Development Directorate

Project: Mahon Local Area Plan 2011

Meeting purpose: Strategic Transport + Traffic Assessment

Author: Jeremy Ward

Date of Meeting: Friday 17 June 2011 @ 12pm

Meeting Venue: Room 1.1, City Hall, Cork

Note of meeting prepared: Wednesday 13 July 2011 by Jeremy Ward [v1.2 4.00pm]

Attendees

Cork City Council	NTA
<u>Planning + Development</u>	David Clements, Mick MacAree,
Ann Bogan, Erin O'Brien [part],	Owen Shinkwin
Jeremy Ward	NRA
<u>Roads + Transportation</u>	Paul Moran, Richard Bowen
Elizabeth Kidney + John Gibson	Tara Spain
Apologies	
Noel Tummon	

Item	Points	Actions
Introduction	<p>AB opened the meeting and stated that the purpose of the meeting was to give the NTA and the NRA an update on the Mahon Local Area Plan 2011.</p> <p>AB gave a brief overview of the Core Strategy for the city. The NRA outlined their investment strategy for Cork in relation to the Core Strategy.</p> <p>There was a lengthy discussion about the role of the national roads network and the need to strike a balance between strategic role and local distributor role within urban areas. The N25 has 11 junctions on a 14 kilometres stretch, which means that it has a very strong local distributor role.</p> <p>The NRA stated that their aim is to see "freeflow" traffic on the national road network to serve the strategic needs of the region. The NRA considers that freeflow [or near freeflow] is essential to serve the needs of the Ringaskiddy employment node. There was a discussion about the importance of Cork City in relation to the road network.</p>	
Mahon LAP	<p>The City Council gave a brief overview of the four Mahon development options and the related transport and traffic issues, and the approach being taken in the strategic assessment. The following points were discussed:</p> <ul style="list-style-type: none"> The NRA is particularly concerned that the Jack Lynch tunnel is "at capacity". This is defined by daily volume of cars using the N25. There was a discussion about whether confined periods of congestion constitute a real problem within an urban area; 	

Item	Points	Actions
Mahon LAP [contd.]	<ul style="list-style-type: none"> The NRA expressed concern at the volume of traffic using the N25 to get to Mahon Point [from Glanmire / Riverstown / Carrigtwohill]. The NTA indicated that from their experience in Dublin they could provide guidance on the appropriate balance between employment / residential uses from a variety of examples with different characteristics [e.g. a one-third employment : two-thirds residential]. The size of the planning unit and location in relation to the transportation system will therefore make a difference to how many jobs are appropriate; The NTA strongly recommend that the City Council employ area-based parking strategies, rather than site-specific parking strategies. 	NTA to provide ratio guidance
Mahon Point Shopping Centre / demand management	<p>There was a lengthy discussion about the traffic and transportation issues pertaining to Mahon Point Shopping Centre, and the challenges that it poses to the National and Local Road Network and wider accessibility.</p> <p>Issues discussed included:</p> <ul style="list-style-type: none"> Volume of traffic using N25 to get to Mahon Point [this is the main problem at Mahon]; The need for a range of measures to assist access to Mahon and MPSC; Demand Management Tools employed at Liffey Valley Shopping Centre via condition at South Dublin CoCo; Demand management tools employed at Blanchardstown Shopping Centre via condition at Fingal County Council; Demand Management relating to Mahon Point, such as: <ul style="list-style-type: none"> N25 road pricing, including negative impacts on Cork City Centre and local road network; and Regulations to allow local authorities to impose car parking charges on private car parks; Bus-based park and ride from north side of tunnel [e.g. from Dunkettle]; <p>The NTA suggested that we also look at the transportation and traffic strategy for Cherrywood [Carrickmines] in Dublin.</p> <p>The NTA also suggested that we should consider examples of relevant places to develop reasonable assumptions for modal split / trip generation, trip distributions to develop a clear understanding of the issues involved.</p> <p>There was a brief discussion about funding of infrastructure.</p>	

Conclusions	<ul style="list-style-type: none"> NTA agreed to provide a guidance note to Cork City Council on an what they consider to be an appropriate approach to the Mahon Strategic Modelling [Transport and Traffic]; All parties look forward to working together on this and other strategic projects of significance. <p>AB thanked the NTA and NRA for coming to Cork to discuss Mahon and for their helpfulness and willingness to engage on the future of Mahon.</p>	NTA to provide
AOB	None.	
DONM	None defined.	

Jeremy Ward, SEP / 13 July 2011

Owen Shinkwin

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

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

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

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



The Gathering 2013 – be part of it

Hugh Creegan, Director of Transport Investment and Taxi Regulation

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.

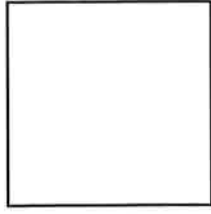
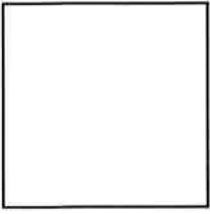
Summary of Submission

See attached submission.

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

Yours faithfully,

Planning Policy Division



The Gathering 2013 – be part of it

Owen Shinkwin

From: Jeremy Ward <jeremy_ward@corkcity.ie>
Sent: 08 August 2012 16:57
To: Owen Shinkwin
Cc: Noel Tummon
Subject: Cork City Movement Strategy Workshop
Attachments: image001.wmz

Hi Owen

I was talking to Noel Tummon yesterday about the workshop on the 21st. He said that I overstepped the mark and that the workshop is proposed to be internal only [he mentioned that the project brief includes two workshops that the NTA are invited to – one in July [last week] and one in September.

Nonetheless – he suggested that you are welcome to come along if you want to. The agenda is limited to:

- Reviewing and signing-off on the KPIs;
- Reviewing and signing-off the concept movement strategy; and
- Working out what goes to the SPC in September 2012.

If you wish to come along please let Noel know. Sorry if I have caused you any hassle.

Cheers

Jeremy

Regards

Jeremy Ward
Acting / Senior Planner

Planning Policy Section
Strategic Planning & Economic Development Directorate,
Cork City Council, City Hall, Cork

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F: 021-492-4712
E: jeremy_ward@corkcity.ie
I: www.corkcity.ie



Cork City Heritage Open Day
Saturday, 18th August 2012

www.corkheritageopenday.ie

Owen Shinkwin

From: Owen Shinkwin
Sent: 26 March 2014 11:02
To: Michael MacAree; Hugh Creegan; Marian Wilson
Subject: Councillors force through changes to map Mahon for next 20 years | Irish Examiner

All,

See attached for City Council's decision on Mahon LAP.

Owen

<http://www.irishexaminer.com/ireland/councillors-force-through-changes-to-map-mahon-for-next-20-years-263162.html#>.

[http://transportforireland.ie/email/images/footer_r1_c1.png] <<http://www.transportforireland.ie/available-apps/>>
[http://transportforireland.ie/email/images/footer_r2_c1.png] <<http://www.transportforireland.ie/available-apps/>>
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Owen Shinkwin

From: Owen Shinkwin
Sent: 23 October 2013 14:11
To: Jeremy Ward (jeremy_ward@corkcity.ie)
Subject: FW: Cork City Council - Submission/observation acknowledgement

Jeremy,

This is the acknowledgement of receipt I received on 16th September.

Regards,

Owen

Subject: Cork City Council - Submission/observation acknowledgement

Owen Shinkwin

1

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Web: www.mcdev.ie

Mr. Gerry Murphy,
Chief Executive
Dún Scéine
Harcourt Lane,
Dublin 2

Wednesday, 05 March 2014

RE: Jacob's Island, Ballinure, Cork

Dear Mr. Murphy,

Further to our recent telephone conversation please find attached a presentation outlining the history, evolution of Jacob's Island and the current public transport, cycling and walking infrastructure serving our lands

The presentation has been prepared in response to concerns attributed to the Authority in the Manager's Report on submission received to the Proposed Alterations to the Local Area Plan. We have not seen a copy of the Authority's submission and therefore relying on the Manager's Report as an accurate summary of the submission.

The concerns of the NTA as summarised in the Manager's Report are central to Cork City Council Planning Policy Unit's justification to omit the proposals to allow for the development of 15,000 m² of office on Jacob's Island, which featured in the Proposed Amendments to the Draft Mahon LAP.

The Manager's Report indicates that the NTA has serious concerns about the location of office development on Jacob's Island and these include concerns that this would

- Undermine the consolidation of development in a single area that can be served by public transport;
- The Mahon Interchange will be loaded;
- Public transport can't effectively be delivered to Jacob's Island;
- Poor walking/cycling environment across the interchange; and
- It would have a negative impact on the ability to create a coherent Central Mahon.

The attached Presentation responds to the concerns attributed to the Authority. We believe on review of the attached presentation that the Authority will have a more

informed understanding of the existing public transport, cycling and walking infrastructure serving Jacob's Island, which should address their concerns.

You will note that Jacob's Island from its inception in 2000 when we successfully won a Tender to purchase the lands from the City Council was always envisaged as a sustainable mix opportunity site to be served by public transport.

As outlined in the presentation Jacob's Island is currently serviced by public transport and in fact provides the terminus for the existing Bus Eireann bus service. Jacob's Island is also serviced by the Mahon Shopping Centre shuttle bus service. Contrary to the claims attributed to the Authority we consider that the implementation of the Masterplan and delivery of a sustainable mixed use community on Jacob's Island will assist in the delivery of the proposed BRT to Mahon and offers the potential for the further extension of this route to Harty's Quay, Rochestown and the County area in the future.


As demonstrated in the presentation Jacob's Island has the benefit of the best cycling and walking environment in the City which we put in place to service development on Jacob's Island and therefore, we are surprised that this is considered to be 'poor' by the Authority.

As the Authority has significant influence on sustainable travel provision, the views of the Authority on this matter have now become key to the decision making process in terms of the making of the Mahon LAP. This matter is due to be decided by Council on Monday next March 10th and I would be grateful if the Authority could review their submission in light of the attached presentation and revert. We would welcome the opportunity to meet with you and can do so this Friday if it is convenient for the Authority.

We believe Jacob's Island has excellent sustainable transport links and can contribute positively to the catchment required to justify and sustain the proposed BRT. We would also seek that you might consider extending the BRT to Jacob's Island, which could further increase its catchment by affording the opportunity for those in the County area to avail of the BRT, via the existing public walkway which commences at Harty's Quay.

I look forward to hearing from you.

Yours sincerely,


TOM McCARTHY
BA., MBA.,

Malachy Walsh and Partners

Consulting Engineers

Cork | Tralee | Limerick | London

Mc Carthy Developments, Cork.

**MCCARTHY
DEVELOPMENTS (CORK)
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Mahon LAP

**Submission to National Transport
Authority (NTA) in respect of
Jacob's Island**

**Project No.: 15192
Document No.: 6006/Rev.A
Date: March 2014**

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Owen Shinkwin

From: Tara Spain <tspain@nra.ie>
Sent: 10 January 2014 11:20
To: Owen Shinkwin
Subject: FW: Mahon
Attachments: DMLAP CMR 241013 composite.pdf

fyi

From: Jeremy Ward [mailto:jeremy_ward@corkcity.ie]
Sent: 10 January 2014 10:49
To: Tara Spain
Subject: RE: Mahon

Hi Tara

No probs. Just looked on the website and the wrong report is there. Sorry about that. Look forward to receiving your submission.

Just so you know we have started doing some of the extra modelling requested, including the Paramics on the interchange.

Jeremy Ward

Senior Executive Planner

Planning Policy Section
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Floor 1, Civic Offices, Anglesea Street, Cork

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Cork City Council
Comhairle Cathrach Chorcaí

From: Tara Spain [<mailto:tspain@nra.ie>]
Sent: 10 January 2014 10:26
To: Jeremy Ward
Subject: Mahon

Hi Jeremy

Is there any chance that I could get a copy of report of the City Manager (dated 24th October 2013) on *Public Consultation on the Draft Mahon Local Area Plan* please?

I need it to prepare our submission.

Thanks

Tara

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

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Draft Mahon Local Area Plan 2013

City Manager's Report on consultation on the draft local area plan

Thursday 24 October 2013

Strategic Planning and Economic Development Directorate
Cork City Council
City Hall, Cork



Stiúrthóireacht Pleanála Stratéiseach agus Forbairt Eacnamíochta
Comhairle Cathrach Chorchai
Halla na Cathrach, Corcaígh

Owen Shinkwin

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

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

Hugh

Good Morning

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

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

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

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

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

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

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

Regards

Tara

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

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

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

Dáta | Date

20 January 2014

Ár dTag. | Our Ref.

NRA Ref: 14-89281

Bhur dTag. | Your Ref.

Re: Amendments to Draft Mahon Local Area Plan 2013

Dear Mr. Ledwidge,

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

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

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

1. CLARIFICATION OF CONSULTATION

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

2. INCREASED CONNECTIVITY

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

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

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

3. DEVELOPMENT STRATEGY IMPLEMENTATION

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

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

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

4. STRATEGIC TRANSPORT IMPACT

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

4. JACOBS ISLAND

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

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

	<p>exact employment figure for the Mahon area (or any area) the City Council will monitor trends as far as it can with the resources that it has available to get an up-to-date figure for use in assessing new development proposals in the Development Management process.</p> <p>The Mahon Strategic Transportation and Traffic Assessment 2012 shows that the transport capacity of the Mahon area, based upon a wide range of assumptions, is for 7,400 jobs over 2006 levels. Existing planning permission commitments exceed this maximum transport capacity by 350 600 jobs. Figure 3.0 (below) identifies the major sites with employment and residential planning commitments (current and expired).</p>																			
14	<p>3.2.3: Breakdown of Targets</p> <p>The overall targets for the plan area are broken down into indicative yields for each sub-area in Table 3.4</p> <p>Table 3.3a: Indicative breakdown of targets</p> <p>Sub-Area SA9: JI</p> <p>Tranche 2 EMPLOYMENT (jobs) 500-1,000</p> <p>TOTAL FOR LAP EMPLOYMENT (jobs) 3,000*</p>	After 25																		
19	<p>Table 3.4: Mahon: Scope for retail and local services development</p> <p>Neighbourhood Centres</p> <p>Jacob's Island A new neighbourhood centre on Jacob's Island of a scale to serve the needs of the residential population. The current development plan provides for an upgrading of the Local Centre to a Neighbourhood Centre. Currently 1200gsm 4900gsm is committed, of which 300sqm is pure convenience retail.</p>	31																		
64 abridged	<p>4.10: Sub-Area 9: Jacob's Island</p> <p><u>Jacobs Island Sub-area data</u></p> <table><tr><td>Residential Development</td><td></td></tr><tr><td><i>Existing residential units</i></td><td>331</td></tr><tr><td><i>Gross floor area as a % of total</i></td><td>95% minimum</td></tr><tr><td><i>Residential yield [dwellings per hectare]</i></td><td>40-35-90dph (<i>medium – medium-high density</i>)</td></tr><tr><td><i>Indicative new units</i></td><td>250-635- target 410 units 250-635 (503 committed) target 450 units</td></tr><tr><td><i>Indicative additional population</i></td><td>600-1530 – target 964</td></tr><tr><td>Non-residential development</td><td></td></tr><tr><td><i>Gross floor area (as a % of total)</i></td><td>5% maximum</td></tr><tr><td><i>Non-residential type</i></td><td>Neighbourhood Centre and ancillary local services and up to 15,000gsm business and technology employment uses.</td></tr></table>	Residential Development		<i>Existing residential units</i>	331	<i>Gross floor area as a % of total</i>	95% minimum	<i>Residential yield [dwellings per hectare]</i>	40- 35 -90dph (<i>medium – medium-high density</i>)	<i>Indicative new units</i>	250-635- target 410 units 250-635 (503 committed) target 450 units	<i>Indicative additional population</i>	600-1530 – target 964	Non-residential development		<i>Gross floor area (as a % of total)</i>	5% maximum	<i>Non-residential type</i>	Neighbourhood Centre and ancillary local services and up to 15,000gsm business and technology employment uses.	87-89
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	<i>Neighbourhood Centre</i> <i>Community facilities</i>	4900 1200 gsm local centre committed (convenience and local services) plus appropriate enlargement and additional neighbourhood centre scale shopping Childcare facilities	
	<p>*****</p> <p>An existing planning permission for a local centre of 1900gsm 1,200gsm has been granted to provide for the local commercial services needs of the area. Any additional neighbourhood centre development must complement the existing commitment and must also front onto the spine road. Limited Business and Technology Uses will be open for consideration on Jacob's Island up to a maximum of 15,000 gross square metres on land benefitting from a "Residential, Local Services and Institutions" land use zoning objective. The provision of this proposed use is subject to appropriate transport and traffic capacity assessment and appropriate consideration of residential amenity.</p>		
Fig 4.10	Map Objective NC		

Those concerns can be summarised as follows:

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

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

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

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

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

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

The Authority would highlight that:

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

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

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

The Authority would also support this view.

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

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

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

CONCLUSION

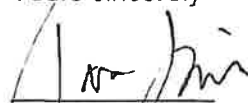
From the Authority's point of view, all the national road junctions in the Cork Metropolitan area are extremely important thus the impact of development generated traffic (residential and commercial) must be managed so as not to unduly interfere with the strategic movement of goods and people to/from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

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

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

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

Yours sincerely



Tara Spain
Senior Policy Advisor (Planning)

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

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Dáta | Date

20 January 2014

Ár dTag. | Our Ref.

NRA Ref: 13-89231

Bhur dTag. | Your Ref.

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

Dear Mr. Ledwidge,

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

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

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

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

LAND USE ISSUES

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

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

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

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

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

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

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

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

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

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

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

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

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

JACOBS ISLAND

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

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

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

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

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

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

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

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

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

The Authority would also support this view.

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

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

CONCLUSION

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

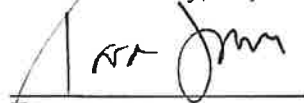
area and any delays and congestion on this corridor have an immediate, wide impact across the entire Cork City.

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

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

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

Yours sincerely,

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

Tara Spain
Senior Policy Advisor (Planning)

95

Owen Shinkwin

From: Owen Shinkwin
Sent: 11 September 2012 12:20
To: Roy OConnor; Con Kehely
Subject: FW: Mahon LAP
Attachments: 20120628 C81323 Mahon Area TT Assessment Final Report v2.pdf; MLAP 2012 Transport Stakeholders mtg agenda 100912.pdf

Roy, Con,

For your information, see attached TT Assessment undertaken as part of the LAP currently being prepared for the Mahon area.

I will update you on progress, after tomorrow's meeting.

Owen

From: Jeremy Ward [mailto:jeremy_ward@corkcity.ie]
Sent: 10 September 2012 17:18
To: Owen Shinkwin; David Clements; Michael MacAree; Tara Spain; Paul Moran (pmoran@nra.ie); rbowen@nra.ie
Cc: Ann Bogan; Pat Ledwidge; Noel Tummon; Elizabeth Kidney; Gerry O'Beirne
Subject: Mahon LAP

Dear Transport Stakeholder colleagues

Please find a copy of the following in advance of the meeting scheduled for Wednesday afternoon at 2.30pm:

- A proposed agenda for the meeting;
- The copy of the *Mahon Strategic Transport + Traffic Assessment* [June 2012].

We look forward to seeing you in Cork very much.

Kind regards

Jeremy

Regards

Jeremy Ward
Senior Executive Planner

Planning Policy Section
Strategic Planning + Economic Development Directorate
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Mahon Strategic Transport & Traffic Assessment

Final Report – June 2012

Report for Cork City Council

In Association With Cork City Council Planning and Traffic Departments

June 2012



Planning Policy Section
Strategic Planning + Economic Development Directorate
Cork City Council
City Hall, Cork

Rannóg Polasai Pleanála
Stiúrthóireacht Pleanála Stratéiseach agus Forbairt Eacnamíochta
Comhairle Cathrach Chorchai
Halla na Cathrach, Corcaigh



Project:	Mahon Local Area Plan 2012
Meeting purpose:	Land use + transport strategy review
Invitees	NTA, NRA + internal [SPED / R+T]
Date of meeting:	Wednesday 12 September 2012 [2.30pm]
Meeting venue:	City Hall, Cork [Multi-media room]

Proposed Agenda

Presentation on LAP

Strategic context recap

The vision for Mahon

The emerging land use strategy for Mahon

Transport strategy for Mahon

What the MST+TA says about the land use and transport strategy

LAP programme

Feedback and discussion

Integrating proposed Mahon transport measures into the Cork City Framework Plan for Transport Investment: 2013-2016

Conclusions and way forward

10 September 2012/
JW

Owen Shinkwin

From: Marian Wilson
Sent: 06 September 2013 15:30
To: David Clements
Cc: Roy OConnor; Arlene Finn; John Keating
Subject: FW: NTA submission on the Draft Mahon Local Area Plan 2013 Rev1
Attachments: NTA submission on the Draft Mahon Local Area Plan 2013 Rev1.docx

David,

I would like to make the following observations on the Mahon LAP:

- a. If the principle of locating significant employment and commercial / retail developments on the periphery of the city is to succeed, the increasingly non-radial pattern of demand for transport that these types of development will generate needs to be recognised and attractively catered for by other than car. The aspiration to meet the future transport needs of Mahon by the provision of high-quality bus transport on an East-West alignment, including the aspiration for that to evolve to BRT, is good but addresses only one niche need of the total likely to arise. There is no analysis presented of what the scale and pattern of the distribution of future demand for transport will be if development objectives are achieved. Without the totality of the picture, the plan may provide for only a proportion, and perhaps a small proportion, of the future demand. Since the balance will fall to car, congestion in the area will be desperate.
- b. Urban Design and Public Transport - With the entry / exit points for public transport serving the area set at both the Mahon Interchange and Skehard Road, efforts should concentrate on developing a legible bi-directional bus path through the LAP area to be used exclusively by all public transport route and service variants and shared with pedestrians and cyclists, and on continuing this path across the N40 / Mahon Interchange to reach the proposed additional residential area postulated for Jacob's Island. Given the challenges posed by this site's segregation from the main LAP area (by the N40 / Mahon Interchange) the LAP should demonstrate how the area is to be served by public transport and how an acceptable walking / cycling environment to facilitate local movement to the Mahon district centre can be achieved. Additional residential development of the Jacob's Island lands should not proceed in the absence of a plan to show how its demand for transport can be sustainably addressed. The bus path through the heart of the district centre and the employment centre should be easily accessible on foot to the main origins and destinations in the area and include measures which prioritise bus movements on sections shared with vehicular traffic, which permit good connectivity between services by the location of bus stops and waiting facilities, and which integrates with and supports pedestrian / cycle facilities. A high degree of pedestrian and cycle permeability throughout the plan area should be achieved along direct, safe and attractive alignments.
- c. Population to Employment Ratio - Proposing a balance of job / residents at 0.5:1 may not be appropriate within the Mahon context and may not necessarily be what is required for a balanced transportation system given the location of Mahon relative to the city and the likely BRT transport corridor. Also Mahon is likely to have a significantly less diverse range of employment opportunities than the wider city centre area and is unlikely to achieve a similar mode share to that of the city centre.
- d. Demand Management Measures - Parking demand management measures will be critical to increasing public transport mode share and management measures / interventions should be seen to directly correspond to any incremental public transport service improvements
- e. Schemes to promote alternative forms of tenure of new residential development should be included, to maximise the potential that people will live and work and shop in Mahon, thereby reducing the overall demand for travel and increasing sustainability.

With respect to the draft letter I attach a tracked changes version with some additional suggestions to the text.

One point in the letter confuses me - that the Authority supports the proposed to re-designate former retail sites to be re-developed as non-retail commercial. Residential I understand, but I thought we supported the centrality argument of placing destinations at the centre i.e. in Cork City where public transport becomes a more viable mode choice?

Lastly, and I know this comment will be unwelcome given the fragmentation of land use planning in Cork due to 2 Planning Authorities, Douglas Village is pursuing a publicly funded strategy to reverse poor occupancy levels of retail and commercial uses in the Village. So both Douglas and Mahon in broadly the same quadrant of Cork are vying for the same market, and they can't both be successful, especially in the fragile economic environment likely to continue for a while. It's up to the Authority however to point this out, since we may be funding each or both teams in their eventual pursuit of measures to implement strategies with interdependencies.

Hope this helps

Regards,

Marian

Marian Wilson

Head of Transport Services Planning Division

NATIONAL TRANSPORT AUTHORITY

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marian.wilson@nationaltransport.ie



Web: <http://www.nationaltransport.ie>

From: David Clements
Sent: 03 September 2013 16:54
To: Roy OConnor; Marian Wilson; Arlene Finn
Subject: NTA submission on the Draft Mahon Local Area Plan 2013 Rev1

Hi all,

Please find attached our first go at a submission on the Draft Mahon LAP. If you have any comments, please respond by Monday 9th September.

Local Area Plan is [here](#)

Thanks,
David

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

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

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

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

16th 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 C~~consolidation to reverse of the currently 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 inextensive 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.

High Quality Bus Routes

The development of a high quality east-west bus corridor serving Mahon 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 is amended to reflect this, 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, stops ~~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. (Do not understand this point?)

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 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.

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

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.

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 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 a the district centre core.

Reference to Current NTA Guidance in the LAP

It is recommended that reference is made, in the appropriate sections, to NTA guidance as follows:

- Achieving Effective Workplace Travel Plans – A Guide for Local Authorities;
- Workplace Travel Plans – A Guide for Implementers; 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 network 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 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

97

Owen Shinkwin

From: Owen Shinkwin
Sent: 07 March 2014 10:51
To: 'tom@mcdev.ie'
Subject: Hugh Creegan's response to letter from Mr Tom McCarthy, dated 5th March 2014
Attachments: Hugh Creegan's response to letter from Mr Tom McCarthy, dated 5th March 2014.pdf

Dear Mr McCarthy,

Please find attached Hugh Creegan's response to your letter, dated 5th March 2014.

Yours sincerely,

Owen Shinkwin

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Mr Tom McCarthy
McCarthy Developments (Cork) Ltd.,
Centre Park House,
Centre Park Road,
Cork

7th March 2014

RE: Jacob's Island, Ballinure, Cork

Dear Mr McCarthy,

I am writing to you in regards to your letter to Gerry Murphy dated 5th March, and the issues raised in this and the accompanying report (*Submission to National Transport Authority (NTA) in respect of Jacob's Island*).

In regards to issues arising in relation to the preparation of statutory development plans, it is the Authority's practice to raise such matters directly with the relevant local authority.

We have reviewed the detailed document which you provided to us and acknowledge the extensive level of information provided in that report. You will appreciate that we would already have been aware of much, if not all, of the factual information set out in the document.

Having reviewed the report-and considered the issues raised by you, the submission made to Cork City Council on 24th January remains the Authority's position, in regards to the Proposed Alterations to the Draft Mahon Local Area Plan 2013.

In relation to a meeting with you, it is our policy to channel such meetings through the relevant local authority, and to facilitate such meetings only when arranged, and attended by, the local authority.

Yours sincerely,



Hugh Creegan
Director of Transport Investment and Taxi Regulation