

**Náisiúnta**

National Transport Authority

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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

Owen Shinkwin

From: Jeremy Ward <jeremy_ward@corkcity.ie>
Sent: 13 September 2012 10:08
To: Tara Spain; rbowen@nra.ie; Owen Shinkwin; David Clements
Cc: Noel Tummon
Subject: Jacob's Island Additional Development Assessment
Attachments: 20120704 CCC C8137100 Jacobs Island Assessment Report Final.pdf

Dear all

Thank you very much to all of you for coming to City Hall yesterday. Much appreciated. The discussion was very useful indeed. Please find a copy of the additional assessment undertaken for Jacob's Island. I hope that you will find it clear and concise [it should only take 15 minutes to read].

When we receive your list of comments / requests then we could perhaps meet up to go through the issues in more detail next time you are down [after we've sent what we can give you].

Regards

Jeremy Ward
Senior Executive Planner

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

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Owen Shinkwin

From: Tara Spain <tspain@nra.ie>
Sent: 16 January 2014 14:57
To: Owen Shinkwin
Subject: Mahon
Attachments: Variation no. 11 city.docx; South Mahon LAP amendments jan 2014.doc

Owen

My two submission will probably send them out on Tuesday.
Tara

Tara Spain
Senior Policy Advisor (Planning)
National Roads Authority
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Dublin 4
Direct Dial 0035316658849

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Owen Shinkwin

From: Jeremy Ward <jeremy_ward@corkcity.ie>
Sent: 03 August 2012 18:09
To: Owen Shinkwin
Subject: Mahon
Attachments: image003.wmz

Liz K / Gerry B are out all of that week [just confirmed]. Are you and Dave free at all w/c 3/9? Please confirm. Thanks

Regards

Jeremy Ward
Acting / Senior Planner

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Cork City Heritage Open Day
Saturday, 18th August 2012

www.corkheritageopenday.ie

Owen Shinkwin

From: Owen Shinkwin
Sent: 09 January 2014 11:55
To: 'Tara Spain'
Subject: Mahon Draft LAP - NTA submission

Tara,

As discussed, the following points were made in the NTA's submission on the Mahon Draft LAP, dated 16th September 2013.

Regards,

Owen Shinkwin

Údarás Náisiúnta Iompair

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Overall View of the Draft LAP

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

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

In regards to the proposed hierarchy of retail centres, the Authority would also support the LAP's proposal to limit further retail floorspace growth at the existing District Centre (Mahon Point), whilst at the same time, seeking to achieve a more consolidated urban form, improved public realm and better local accessibility within this area on the basis of a broader mix of land uses, including residential and non-retail commercial. The Authority also supports the development and/or consolidation of a number of neighbourhood centres, which would improve accessibility to a broader range of services at a more localised level.

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

Residential and Employment Development

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

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

High Quality Bus Routes

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

The Location & Phasing of Development and BRT

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

The Population to Employment Ratio Rationale

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

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

Transport Demand Management Measures

The National Road Network

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

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

Parking

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

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

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

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

Travel Planning / Mobility Management

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

Impact of Transport Demand Management on Non-Local Trip Patterns

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

Development Proposals for Jacobs Island Lands

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

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

Reference to Current NTA Guidance in the LAP

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

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

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

Transport Infrastructure Details

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

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

Owen Shinkwin

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

Owen,

Some points on the Draft Mahon LAP as discussed:

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

David

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



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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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Owen Shinkwin

From: Jeremy Ward <jeremy_ward@corkcity.ie>
Sent: 17 June 2011 16:42
To: Michael MacAree
Cc: Owen Shinkwin
Subject: Mahon LAP

Hi Mick

Just to say a big thank you to you [and Owen] for coming to meet us today and for offering very constructive comments in the Mahon LAP meeting. It was a very interesting meeting.

I am off next week but it would be really useful, if it were possible, for you to send your "approach" to us by Monday 27 June 2011. I don't know if that is possible. If it isn't then I will give you a call on the 27th to discuss the approach and your guidance.

Many thanks and kind regards

Regards

Jeremy Ward
Senior Executive Planner

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

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Owen Shinkwin

From: Owen Shinkwin
Sent: 20 September 2012 13:53
To: Jeremy Ward (jeremy_ward@corkcity.ie)
Subject: Mahon LAP (Sandyford Area MMP information)
Attachments: Sandyford Area MMP.PDF; Sandyford Urban Framework Plan.pdf; SST MMP NTA March 2012 (2).pdf; sst-plan-summary.pdf

Jeremy,

As discussed at the last meeting, I have attached some information on Dun Laoghaire / Rathdown's area-based mobility management plan in Sandyford.

I have also spoken with Jerry Flaherty (Sustainable Travel Officer in DL/R County Council), this morning. He said he would be happy to meet with us to discuss DL/R's experience in developing an area-based MMP at Sandyford. The preferred time for the meeting would be 2nd week of October, so can please let me know your availability that week.

I will not be able to get our comments on the Mahon documents to you today, probably not possible until next Monday or Tuesday, if that's okay.

Regards,

Owen

Owen Shinkwin

From: John Keating
Sent: 05 September 2013 18:04
To: Marian Wilson
Subject: Mahon LAP comments
Attachments: Mahon Draft LAP Comments.docx

Marian

Comments attached, please feel free to add / detract as you see fit.

Rgds

JK

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Owen Shinkwin

From: Jeremy Ward <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
Attachments: 20120628 C81323 Mahon Area TT Assessment Final Report v2.pdf; MLAP 2012 Transport Stakeholders mtg agenda 100912.pdf

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

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Owen Shinkwin

From: Jeremy Ward <jeremy_ward@corkcity.ie>
Sent: 25 July 2012 12:58
To: Owen Shinkwin
Subject: Mahon LAP

Hi Owen

I hope that you are well.

I am just sending a quick email to make contact with you regarding setting up a meeting regarding the above / N40 between the Cork City Council, the NTA and the NRA. Please give me a call on the number below when you get a moment [I don't have your direct number].

Many thanks

Regards

Jeremy Ward
Acting / Senior Planner

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109

Owen Shinkwin

From: Jeremy Ward <jeremy_ward@corkcity.ie>
Sent: 03 August 2012 17:34
To: Owen Shinkwin
Subject: Mahon meeting
Attachments: image001.wmz

Hi Owen

Just trying to arrange this meeting....sorry it's taking a while. Does Wednesday 15th August PM suit you and your colleagues for a meeting?

Hopefully we can fix the meeting on Tuesday and I can email the doc out to you after that. Have a good weekend.

Please get back to me at your earliest convenience.

Regards

Jeremy Ward
Acting / Senior Planner

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Owen Shinkwin

From: Jeremy Ward <jeremy_ward@corkcity.ie>
Sent: 02 August 2012 12:37
To: Tara Spain (tspain@nra.ie)
Cc: Elizabeth Kidney; Paul Moran (pmoran@nra.ie); rbowen@nra.ie; Noel Tummon; Owen Shinkwin
Subject: Mahon Strategic Transport and Traffic Assessment / Mahon LAP
Attachments: image001.wmz

Dear Tara

Further to our previous conversation [on 7 June 2012] regarding progress on the proposed Mahon LAP I am now in a position to confirm that the *Mahon Strategic Transport and Traffic Assessment* has now been completed and that the City Council would like to invite the NRA and NTA, as key transport stakeholders, to a meeting to:

- Review the outcome from the transport assessment; and
- Review the sketch preliminary area wide strategy that will form the basis for the Local Area Plan.

I will try to call you this afternoon to establish the availability of you and your colleagues for such a meeting. We are looking at holding the meeting in the week commencing 20/8 but if this doesn't suit then we can review this to accommodate you and your colleagues.

I look forward very much to your involvement at the proposed meeting.

Regards

Jeremy Ward
Acting / Senior Planner

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Rannóg Polasáí 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

Jeremy,

We have reviewed the documentation on the methodology proposed and would make the following comments.

In deriving model input data, it is important to be cognisant of all-day travel demand, particularly for retail, and the requirements and nature of local trips. Neither of these elements can be fully accounted for using a traditional highway model which assesses the impact of trips, focussed on mechanised modes, on the road network. While the methodology seems reasonable, based along traditional lines, we feel that it needs to be supported by more evidence based analysis

Trip rates

Trip rates would be more accurately derived from existing developments using empirical data sources, rather than basing it solely on floorspace. The latter should be used as a check rather than a determinant. These trip rates can be calculated on the basis of the different land uses proposed as follows:

Employment:

Using POWCAR data from 2006 for a similar type of development elsewhere in Cork, in combination with observed travel patterns from any existing surveys, the numbers of employees and the trip rate can be derived for the office and employment elements of the proposed development and can be applied throughout the day.

Residential:

Data from the NTA Household Survey will give an estimate of trips generated across the day from their origins. Even though this survey dates from 2006 and relates to the GDA only, it has been found that the trips generated by households does not vary by time or location.

Retail:

The NTA Household Survey, in combination with local data sources, should give a more robust basis for the derivation of trip rates to retail. Again, this will give an all-day figure for 7-days of the week which can be used to examine peak retail times at weekends. POWCAR data can be used to estimate a trip rate for retail employees.

Education:

The NTA Education survey for the GDA, also from 2006, will give detailed empirical evidence for any school trips that may be generated in the Mahon area. Again this should be examined in combination with local data.

Mode Splits

The mode split for walking and cycling could be derived from an analysis of POWCAR and by making assumptions based on potential for these modes. A target could be derived from developments in Cork, or elsewhere, which have a high walking and cycling mode share.

An analysis of trip lengths from the POWCAR database would then show potential for these modes – i.e. any trips to work or education below 2km are potential walking trips and trips below 5km for cycling. A similar approach could be used for Retail based on the empirical evidence provided by the NTA Household Survey. This stage would be part of Phase 2 as set out in the methodology paper, in advance of the application of Smarter Travel.

Analysis of Local Trips

The highway model does not examine trips within model zones – internal trips. For the purposes of planning, it is these trips that can be most important. While the model will give a ratio of internal trips as a percentage of trips generated by, or attracted to, each zone, it is not intended as a tool to consider local network measures – particularly any measures related to quality. The Transport Assessment should be cognisant of these factors and in a full analysis, examine the needs of local or internal trips, particularly as it relates to walking and cycling measures in the LAP.

(a) The modelling methodology seems reasonable, but along very traditional lines and needs to be supported by more evidence based analysis – as per b and c below.

(b) Trip attraction rates should be derived from a number of the POWCAR data using similar (industry type) developments - it should not rely on floor area, but should just take number of jobs and appropriate trip rates from POWCAR. There is also data from the NTA Household survey and the Education survey which may be of assistance in deriving the trip rates.

(c) Rather than just setting targets for walking and cycling based on distance between home and work, the targets should be based if possible on evidence from the POWCAR dataset. E.g. take an existing mixed use development in Cork where walking and cycling percentages are high – examine the patterns of travel & trip length distribution etc and set this example as the target. If no such good example exists in Cork – take a good example from elsewhere (e.g. a town centre with good walking and cycling percentages). In setting targets make sure there are no natural physical barriers to walking & cycling – e.g. steep hills etc. In the absence of such physical barriers, targets achieved in other areas can be achieved for the Mahon development through network, DM and parking measures as suggested in the MVA report.

The Mahon Area is part of the wider Cork Area and in order to plan for such developments it is considered necessary to understand the hierarchical role/function of the area in the wider Cork context. It is considered necessary to plan for travel by mode at a regional level in order to understand the effects of developing at the local level (such as an LAP).

The approach taking to travel planning within the GDA has focused on the population as the driver for trip demand and the key destinations examined are employment, education and retail. Retail is considered as a proxy for settlement service levels which are considered to exist in a hierarchy:

1. Neighbourhood Centre (serving between 5000 – 10000 population)
2. District Centre (Serving between 25000-50000 population)
3. Town Centres (Serving between 100,00 -150,000 population)
4. City Centre (Serving 250000+ population)

At each scale an understanding of what demand is to be served is estimated. In examining the demand and the supply for travel an understanding of travel requirements can be established such as Volume of demand, by distance, journey time, mode etc. With this information the potential to serve demand by various modes can be understood, “potential demand by mode”. This information is used to develop mode share targets for each settlement level and their catchment within the hierarchy. This provides for a consistent examination of both local and strategic trips (trips outside the settlement planned catchment area).

There is not a requirement to model in detail all this information, but it provides for a more consistent methodology if these factors are considered and influence the assumptions used in the local and wider area models.

The proposal follows a traditional modelling approach, which is not a problem, but the analysis tends to concentrate on the road network and does not necessarily provide important information in relation to the alternative modes which need to be considered in the Mahon LAP.

As stated at the meeting it may not be necessary to model all aspects of travel however it is important to consider and understand the assumptions made in the current proposal.

An approach that we would take (which may be available from your Cork Area Model) would be to develop a “closed model” that is an area where the most of the trips generated and attracted are covered and the net migration is negligible.

In this approach we have derived the trip rates based on a Household survey and supplemented this with the POWCAR data and an education Survey. The total trips generated is then distributed based on different destination criteria (numbers employed, number in education, retail square meterage etc).

With a trip distribution both for the base and the future the opportunity for travel by different modes is established based travel criteria. Walking up to 3 km. Cycling up 6km and using the model to establish mode share based on cost of travel.

Examining the trip demand over the day also allows for other trips (particularly local trips) to play an important part in the development of a local area plan. While strategic trips are considered essential in understanding investment in major infrastructure the planning at the local level needs to find a balance between access to and from the wider area with local movement.

It has also been difficult to get a good handle on local bus movement (as opposed to strategic movement) and some assumptions need to be developed. Again with a good understanding of the trip distribution over time and purpose reasonable assumptions can be applied.

The way we would recommend that the assessment is done is as follows. The trip rates are derived from the origin side. They would be based on available data (in particular POWCAR). The NTA household data and education data may supplement data which Cork County Council have. There should be a macro level understanding of the growth in employment by sectors. We would again take this information from the labour force (origin side) and then distribute the demand based on empirical evidence and policy assumptions (such as a gravity model type approach). Using destination trip rates based on floor area should be used as a check rather than a determinant. This approach is derived in a wider area model which allow the local area plans to be examined in a consistent way.

With a fixed demand based on population (and labour force employment) you can then examine the distribution of trips.

NTA Comments on the Mahon Strategic Transport and Traffic Assessment

2nd 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,