

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 and its objective of seeking to accommodate substantial further population and employment growth within the boundaries of the City, on the basis of the following:

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

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

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

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

Residential and Employment Development

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

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

High Quality Bus Routes

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

The Location & Phasing of Development and BRT

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

The Population to Employment Ratio Rationale

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

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

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

Transport Demand Management Measures

The National Road Network

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

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

Parking

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

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

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

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

Travel Planning / Mobility Management

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

Impact of Transport Demand Management on Non-Local Trip Patterns

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

Development Proposals for Jacobs Island Lands

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

- Its physical separation from Mahon by the N40 Mahon Interchange and the resultant local trips which would be loaded onto the interchange;
- The challenges of delivering a level of public transport service and network accessibility which counterbalances the competitive advantage which its location adjacent to the N40 affords to car mode, for non-local trips;
- The challenges in delivering a walking and cycling environment in the vicinity of the interchange, which delivers a competitive advantage to walking and cycling for local trip making to areas, north of the interchange;

- In general, the need to consolidate future development in areas which can provide the greatest support for higher levels of public transport service in Mahon and around the district centre core.

Reference to Current NTA Guidance in the LAP

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

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

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

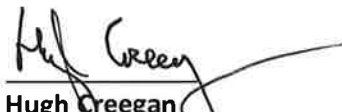
Transport Infrastructure Details

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

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

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

Yours sincerely,



Hugh Creegan
Director of Transport Investment and Taxi Regulation