

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

24<sup>th</sup> January 2014

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

Dear Mr Ledwidge,

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

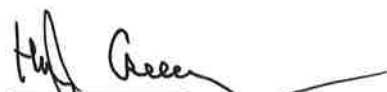
In regards to the maintenance of existing car parking levels at their present maximum levels, this does not appear to be consistent with the LAP's objective of creating a more locally-focused district centre with improved levels of accessibility by walking and cycling at the local level and by public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

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

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

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

Yours sincerely,



**Hugh Creegan**

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