



Submission to the National Transport Authority by the

Cork Business Association

to the

Cork Metropolitan Area Draft Transport Strategy 2040



June 2019

1.0 Executive Summary

This submission is presented to the National Transport Authority by the Cork Business Association [hereinafter referred to as the CBA] and represents the collective views of its members in response to the Cork Metropolitan Area Draft Transport Strategy 2040.

The CBA welcomes the opportunity to make a submission to the proposed strategy and as a key stakeholder representing over 200 businesses, considers active engagement between agencies tasked with planning for our infrastructure, and businesses as an imperative component of successfully implementing any proposed scheme. In keeping with the core mission and objectives of the CBA, the CBA strongly advocates any new initiatives which will create a better business environment for traders, employers, customers and tourists. With this in mind, the CBA places a high level of importance on scrutinising any proposed initiatives against these key indicators; in particular, transport measures.

It is widely known that there is limited capacity within the existing transport network in the Cork Metropolitan Area to cater for additional motor traffic from cars. Not only is it unsustainable in environmental terms but it is simply not efficient or realistic to expect the existing road [car and road based public transport] network to cater for the exponential predicted growth that the Cork Region is set to face.

The CBA wholeheartedly support mechanisms which will lead to an efficient public transport system ultimately resulting in more efficient commuting times and reliable public transport in a manner that is deserving of Cork, Ireland's second city, and believes that a coordinated strategy such as CMATS is the way to deliver this but calls for it to be made a statutory document [once refines] to ensure it is not just a plan that is never implemented.

The CBA cautions that land use planning [policy and development management] and transport planning will need to be far more closely aligned to reduce the need to travel by car and support the functioning of a sustainable, integrated transport system. This means there needs to be a commitment to prioritising the walking, cycling, rail, light rail and national road systems over and above the local roads based interventions.

The CBA firmly believes that the temporary and perceived negative implications associated with much of the proposed works will pale into insignificance when the tremendously transformative positive effects of having a reliable and efficient mass public transit system for the Cork Metropolitan Area are in place.

2.0 Introduction

The CBA has been representing the business sector in Cork City since 1957. Our extensive membership covers a wide range of businesses encompassing Retail, Hospitality, Financial, Property & Service companies. Our members currently provide a significant proportion of employment in Cork City and the association consists of ratepayers - which constitute 40% of Cork City Council's annual budget. The Association works closely with specific bodies to improve the infrastructure, development, cleanliness and up-keep of the City Centre. In addition, the Association works with other interested bodies for the general improvement and promotion of the City. One of the key objectives of the Cork Business Association is the promotion of Cork City to ensure it remains the key driver for the region and the prime retail location in the south of the country.

The undertaking of CMATS for the city and metropolitan area is welcomed and the CBA fully endorse the focussed approach to developing a comprehensive strategy for the future of the metropolitan area. Accordingly, this submission is primarily concerned with the the viability and vitality of Cork City and the development of key transport, movement, accessibility and connectivity measures that will support the city's economy and environment.

This submission is directed in support of an integrated transportation strategy that, in reference to strategic and local planning policy aspirations, promotes Cork City Metropolitan Area as Ireland's second city of International importance and advocates provisions in the CMATS which support this role. In principle, the CBA is largely supportive of the emerging CMATS, however has a number of recommendations pertaining to same which are presented in this submission.

After a period of relative stagnation, the physical, economic and social landscape in Cork City is positively changing. Specifically, a number of new office, retail and recreational developments have been completed, are underway or have been permitted which signal a number of likely positive changes that will occur in the city over the coming years, particularly population growth and economic growth. The CBA considers that achieving future growth aspirations and employment targets needs to be the key focus for the City Council in the short to medium term. Ensuring there are enough jobs in the city to keep the businesses viable is a crucial component to a vital city and more importantly, ensuring that these people have adequate access to public transport to get them to and from the city is a key element of this.

It is considered that investing in a light rail system as proposed is the best possible mechanism for securing the public transport imperatives that Cork Metropolitan Area needs to sustain growth between now and 2040 and continue to encourage developments.

The CBA are of the view that if Cork City Council is to achieve its ambitious employment and population growth targets it needs to make it easier to get **to** the city, not **through** the city.

The speedy delivery of CMATS and in particular the light rail, train stops and national road connections are crucial factors to securing the successful future development of Cork as a thriving place to live and work and enjoy. Currently the high level of commuting population is extremely unsustainable and needs such a strategy to be realised urgently.

3.0 SUBMISSION

Cork is set to become one of the fastest-growing areas in the country, with its population projected to grow to over half a million over the coming years, the city is experiencing a major economic resurgence with a 10% increase in employment in the past five years. Significant commercial development is underway and we need to plan for 10,000 additional workers in the city in the next five years. Continuing to rely on the car as the main mode of transport will be unsustainable. If we fail to implement change then ultimately, we will end up like Dublin where the average speed at peak times is just 9.6km an hour.

According to motor data company Inrix, Dublin’s traffic congestion is the third worst in the world, behind Bogota and Rome, with motorists in the capital spending almost 250 hours, or 10 full days, a year in traffic last year.

2018 Rank	city	country	region	Time lost in traffic jams in hours	Change from Year to year
1	Bogotá	Colombia	South America	272	-5%
2	Rome	Italy	Europe	254	16%
3	Dublin	Ireland	Europe	246	-4%
4	Paris	France	Europe	237	7%
5	Rostov on the cathedral	Russia	Europe	237	1%
6	London	Great Britain	Europe	227	1%
7	Milan	Italy	Europe	226	6%
8th	Bordeaux	France	Europe	223	12%
9	Mexico City	Mexico	South America	218	3%
10	Moscow	Russia	Europe	210	-12%

The 10 most densely populated cities worldwide 2018 | Source: INRIX

Source: Inrix

The planning policies outlined in the current Cork City and County Development Plans indicate that, where possible, vehicular movement will be limited to public transport but that this would *and should* occur in tandem with the upgrade of public transport provision into and out of the city centre. According to the City Development Plan:

‘The desired outcome for the city centre is for it to be easily accessible for work, business, shopping, and leisure. Accessibility can be provided by means other than private car but will require a transition, particularly when the City Centre is competing with suburban areas that provide free parking. The provision of alternative transport options will be considered in combination with the reduction in the demand for parking’ [CCDP 2015:66]. This statement suggests that more consideration should be given to increasing the standard of public transport provision in Cork City with a view to making it a more vibrant and active city centre.

It is a strategic transport objective of the CCDP 2015-2021 'To develop a Bus Rapid Transit system from Ballincollig to Mahon via the City Centre and Docklands'[CCDP 2015:54].

Evidence of Deviation from previous 'Strategies'

The trends in recent years are extremely worrying: across the city-region, growth outside formal settlements within mainly un-serviced rural areas at 17% outperformed growth in the urban locations which grew by only 15%. In Cork, the city and environs experienced only 7% population increase between 2002-2011, with 54% increases across the metropolitan towns of Blarney, Tower, Carrigaline, Cobh, Passage-West, Carrigtwohill, Midleton and Cobh and 30% growth in the key Ring Towns located within the city-region. It is important to acknowledge that the towns located along the suburban rail corridor (Cobh, Mallow, Carrigtwohill and Midleton) recorded stronger average growth rates of 82% and in Cork, some of the non-core growth within the metropolitan area is in effect planned rail-oriented growth in line with the CASP framework.

However, the analysis also shows that the rural population in this zone expanded by 20,147 in the ten year period, equivalent to a growth rate of 26%. This compares against an overall urban growth rate in Cork city region of 15% and only 7% in the city and suburbs. The rural areas' growth represented 34% of all growth in the city region. As such, the CBA cautions against encouraging the development of the local road network to the south of the city in particular, which could potentially exacerbate this unsatisfactory situation. Whilst it is acknowledged that these are important developments – the local road networks to facilitate medium to long term development should be clearly outlined in CMATS as a long-term aspiration rather than a short to medium term one.

This provides clear evidence of considerable deviation from targeted growth strategies and this trend was contrary to the key principles set out in the settlement strategies of national and regional planning policy and the respective development plans which advocated the strengthening of the urban centres by establishing critical mass and concentrating services in support of sustainable urban development patterns. It also shows the danger of 'aspirational' plans which lack very specific priorities.

North Ring Road

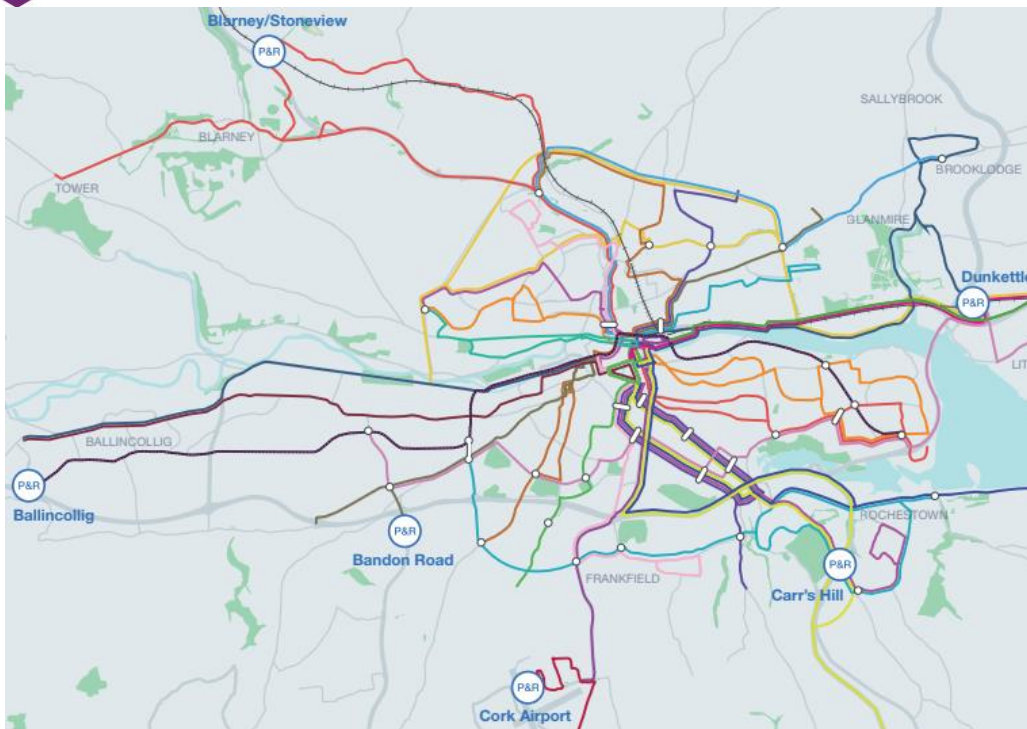
One of the projects that is critical from the CBA's perspective is the Northern Ring Road. It is every bit as critical as any of the other priorities as it is essential to provide proper access through the northside of the city to allow it develop like the southside.

Without the Northern Ring Road, we are putting a lot of traffic through the city. Last year we had 110,000 vehicles daily going through the island in the centre of Cork. That's back to Celtic Tiger levels and the city can't take much more, so we need the Northern Ring Road as a matter of urgency.

The Northern Ring Road would provide access to vast tracts of land to the north of the city for commercial and residential development and would make for a more evenly balanced growth as the southside of the city is currently nearing maximum development capacity.

Park and Rides

Park and Ride facilities are perhaps the most important immediate/short term intervention which need to be implemented to address the very real concern that businesses have in relation to current and future employment populations. As there is a lack of housing supply in the city, workers are forced to live in peripheral suburbs and [as current public transport mechanisms are unreliable] are forced to commute by car which is completely unsustainable and will not attract new employers to the city and may not even sustain the current employment base. The proposed park and rides are as follows and the CBA are fully behind the urgent implementation of all/any of the following:



Indicative Park and Ride Locations Source: Draft CMATS 2018:74

Cork has a high proportion of motorised trips that originate outside the city centre and other strategic employment areas that contribute to local congestion, noise and air pollution. Park and Ride facilities can support economic vitality by improving overall accessibility to the City Centre area and reduce road traffic congestion on radial routes. It can also solve the problem of meeting shortfalls in urban parking capacity which is currently prevalent.

Park and Ride as a component of the CMATS should be [over and above other measures] clearly prioritised and it is considered somewhat unsatisfactory that other mechanisms are categorised as the same level of importance. At present, Cork has extremely limited Park and Ride services with the existing Black Ash facility near the Kinsale Road interchange operating below capacity, most likely because the demand is mainly from the north east and west rather than the south. High quality local walking and cycling networks are indeed a low cost short/immediate term intervention also and the CBA strongly supports these. The prescribed Park and Rides at Dunkettle; Carrs Hill / M28; Cork Airport; Bandon Road Roundabout; Blarney/Stoneview [rail based] are badly needed.

Suburban Rail Stops and Tenacious Commitment to develop housing in these areas as a Priority

There are a number of readily available rail stops that can be achieved with minimal investment and these should be prioritised or more expensive – longer term initiatives. There needs to be expressed commitment from the planning authority to advocating development along this rail corridor for which it has been an aspiration for over 20 years to consolidate development. It is timely that if the review of the development plan is coming up, but without clearly articulated and enumerated priorities all development will be relentlessly promoted which will be reminiscent of the early 2000's which could serve to undermine this important strategy, possibly similar to the non-adherence to the CASP settlement strategy and the docklands development strategy.

Port Relocation

CMATS [page 95] suggests that the relocation of port related activities from the city quays will be an important first step in freeing up large tracts of brownfield land to facilitate large-scale strategic developments. There is no sense that this should happen under CMATS although the Docklands [and development therein] is an important part of the strategy to be realised. It is also not in the implementation section of CMATS [although its implementation is key to the rolling out of the CMATS] and it is recommended that measures to support the relocation of the port and recommendations pertaining to the priorities in this regard should be reflected in the strategy.

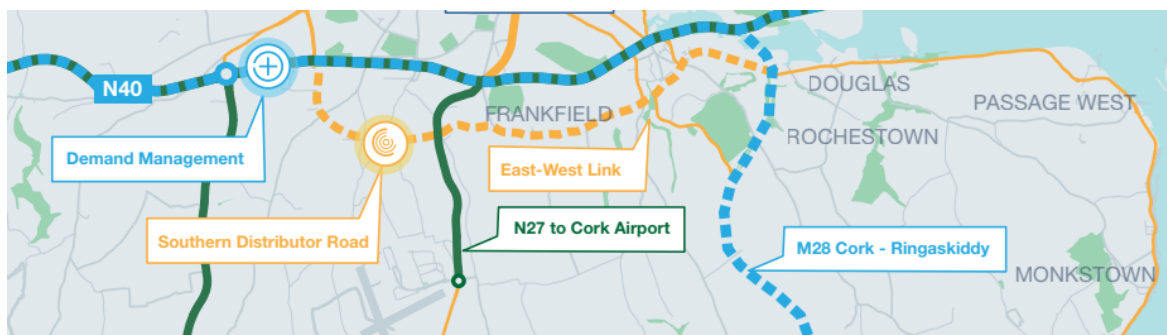
Road Priorities

The CBA questions some of the implementation of the Road Network Section of the CMATS and is of the view that, with the exception of the North Ring Road, the M20 Limerick Motorway and the Dunkettle Interchange, it should be clear that the road interventions prescribed for in the strategy should be clearly de-prioritised [when compared to cycle and park and ride facilities] and their importance, in particular as less important than the light rail measures should be highlighted clearly.

It notes that the 'Appraisal and development of both Northern and Southern Distributor Roads' is a needlessly high short-term priority of the strategy. While the completion of the M28 Cork – Ringaskiddy Motorway to provide improved access to Port of Cork and industry in Ringaskiddy should be clearly enumerated as a higher priority. Without such guidance [even with a statutory footing] all of the priorities will be relentlessly promoted most likely to the detriment of the most important which is the light rail system.

The CBA is slightly concerned with the new roads that are suggested for the southern parts of the metropolitan area. These appear to tie in with the Strategic Land Reserves [the large tracts of land in the Cork Metropolitan Greenbelt intended for medium to longer term development]. It should be made clear in the strategy that these roads are not equal priorities to the delivery of Park and Ride facilities or additional stops along the rail corridor or a light rail. In fact it should be clearly stated in the document that the development of the southern local road network should be the least important part of the strategy as there is a relatively low level of public transport provision in these areas and nor are these areas part of a strategy to introduce either rail or light rail. The focus should be on serving the existing dwellings in these areas by public transport and building more houses in these areas. The big danger is that the perceived barriers associated with implementing CMATS could lead to the relentless pursual of housing in the southside along these local southern distributor roads.

Without being clear about what the priorities are, there is nothing to stop planners from granting large scale residential development in these areas.



Proposed Road Network 2040 Extract Source: Draft CMATS 2018:88

Conclusion

The CBA are tasked with advocating and lobbying for the creation of a better business environment for traders, employers, customers and tourists within Cork City. Cork is set to become the fastest growing city in the country over the next twenty years. To put this into context, Cork is going to have the same amount of population growth as Galway, Limerick and Waterford combined. Obviously, this will require a significant investment in our local infrastructure roads, housing, schools, etc. to ensure we are in a position to exploit this potential. With several new developments already completed or underway, there is a current vacuum as to what will happen to improve the situation for current commuters in the absence of real-time reliable public

transport and there is a very real problem with attracting new employers in the wake of a significant amount of permitted office space in the city.

Very soon the city centre will have over 10,000 additional new jobs, including 5,000 over the next three years. However, we are still some way off having the accommodation capacity we require in the city, in the interim the pressure on our road network will increase. Whilst proposed infrastructure projects such as N28, - M20 – Dunkettle Interchange and the Northern Ring Road, park and rides, rail stops and clear statutory priorities for housing development are key to implementing this important strategy. A modal move to public transport is possible to address the high commuting levels by car but only if we can ensure them of a good-networked public transportation system with time bound schedules, reliable services, affordable prices and competitive travel times. How we bring about these changes will of course be multifaceted from increased investment to legislative and planning reform. However, at the very core it will require us to do things differently and if we do not and revert to type then the below example of dealing with change will become the norm. The lessons learnt from this issue must now become the benchmark as to how we engage, inform and consult in the future. This of course will require us to change, often a difficult process for not alone the ordinary citizen, but also for the institutions of the state as well.

Obviously the road network prescribed in CMATS is easier to deliver than the Light Rail – a coordinated and tenacious implementation of the rail based strategy along the rail corridor at the very least where the infrastructure exists and it is just a matter of developing the proposed stops should be the first priority in CMATS and should be the main priority of Cork City Council and Cork County Council. The towns of Carrigwohill and Midleton and to a lesser extent Little Island and Glounthaune have the capacity for 1,000s of houses to be built with relatively little investment. This should be tenaciously pursued in a sequential manner before developments that rely on car based developments.

The CBA is 100% committed to the prosperity and vibrancy of Cork City and Cork Metropolitan Area but firmly believes that, in this case, the priorities need to be more clearly defined so that the planning authority can make the right decisions for the sustainable development of Cork.