



Transport & Mobility Forum

N/M20 Cork-Limerick Project Office

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c/o Cork Environmental Forum
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P47 C578

15th January 2021

PART 8 Public Consultation – Response N20 Cork-Limerick (Phase 2)

Dear Sir/Madam,

The Transport and Mobility Forum, Cork (TMF) is a representative group of organisations who have a common interest in sustainable travel *. The TMF fully supports sustainable modes of travel measures and policies. Sustainable and Active Travel helps reduce congestion on roads, improve air quality, supports a low carbon economy, reduces noise pollution and improves public health.

The TMF welcomes the opportunity to feed into the public consultation process at this stage, the Phase 2 options selection process for the rail and road based options. We also thank Tara O’Leary and the team at SWECO for their information given to the TMF group in our monthly meeting of 1st December 2020.

General

We see the holistic, cross-modal approach of planning for both a rail based and road based option, along with local active travel improvements, as very positive, as it looks at integrated transport options for the Cork-Limerick corridor, instead of planning for the various transport modes in isolation.

As the TMF is a Cork based group, we will primarily – but not only – look at the effects on the Cork end of the scheme in this submission.



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Road based Options:

We welcome the fact that as the result of Phase 1 route selection, a large-scale planning of an entirely new road (N-road or motorway) for the entire length of the corridor was dropped.

For the present consultation phase 2, the TMF would strongly be in favour of **road-based option T1**, with bypasses of Charleville and Buttevant, but mainly keeping the existing N20 alignment in the southern part with local on-line or off-line improvements. A bypass for Mallow or a significant road improvement for the N20 for its passing through the Mallow station area could be considered, while, however, an additional road bridge across the River Blackwater would involve significant and likely disproportionate cost. Local improvements to the existing road should be done to improve safety, mitigate noise pollution and severance of communities etc. Along with junction improvements, this may include localised realignments of the existing road where necessary.

Apart from the far reduced additional land-take, our main motivation for this is that we would see it as counterproductive to provide an entirely new road between Buttevant / Mallow and Cork City, with improved capacity and comfort, while in parallel all relevant policy documents (RSES South, CMATS) strongly aim at shifting large parts of passenger traffic to sustainable travel modes (bus, train, car-pooling, etc.). As it can be assumed that large parts of the N20 traffic towards Cork will have its destination in and around Cork City, the aim of significantly reducing car traffic in Cork City and improving rail connections on the one hand, and building a new high capacity road leading towards the City on the other hand do not go together. Traffic from the N20 towards West Cork, Carrigaline / Ringaskiddy or Middleton / Waterford should be regarded separately and be seen in conjunction with the plans for a northern ring road outside Cork City, with a large emphasis on serving the needs for freight traffic (HGV).

Accompanying measures to support a shift to sustainable travel will be discussed further down.

Rail based Options:

Direct rail services between the two cities in Munster, i.e. the second and third largest cities in the state, will be of huge benefit to shifting passenger travel to sustainable modes. A direct train connection would provide higher capacities, more comfort, shorter journey times and a high degree of reliability compared to road based bus travel.

Short-term: Direct (change free) train services between Cork and Limerick should be introduced on the existing line(s) via Limerick Junction as soon as possible, which would also improve the attractiveness of rail based commuting into Cork City (and Limerick) from Mallow and Charleville through a doubling (Mallow) of the service frequency. Improved feeder services to Charleville and Mallow stations (bus, park+ride, active travel / bike+ride) and attractive fares must support these new rail services. We believe that the enhanced rail services and accompanying measures can be a substantial contribution to a modal shift towards sustainable travel into Cork from the North, achievable within 3-5 years' time.

Medium/Long-term: In the longer term – as the (new) building of railway lines is a time-consuming undertaking – a new line should be built between Charleville and Limerick.

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From our perspective, the western option of the new line (Option R2a), mainly using the existing alignment of the former Foynes railway, would have some advantages:

- Use of existing alignment, that still might be in CIE ownership
- Option of several additional stations in approach to Limerick (e.g. Croom, Patrickswell or Raheen) for P+R or commuter traffic into Limerick
- Line would serve more populated areas.

A disadvantage might be the apparently more challenging re-alignment in the approach to Limerick Colbert Stn, as the original alignment seems to join the tracks into Colbert Stn facing outbound (east), and a direct routing would necessitate either a tight bend to the west or cutting through Lower Carey's Rd and using the land of the football pitch just south of Colbert Stn.

Active travel:

We strongly welcome the fact that improvements for active travel infrastructure are also part of the N20 project and we clearly acknowledge the holistic approach for finding a comprehensive transport solution in the entire corridor.

Taking much of the existing transient motor traffic out of towns like Charleville and Buttevant offers an excellent opportunity for creating an up-to-date and futureproof active travel infrastructure (cycling and walking) to improve local connectivity for sustainable travel modes.

While pedestrian traffic will only happen in a small radius (2-5km max), it would largely be confined to connecting the wider neighbourhood to the town centres. Cycling however has the potential to cover distances between 5 and 10km. Taking the fast-increasing proliferation of electric bicycles into account, this radius can well reach 15km or more in the near future.

We therefore suggest that improvement of cycling infrastructure should primarily focus on serving local traffic between the towns and their neighbouring villages, to provide safe access to the town centres, services, schools, retail, employment and public transport nodes, particularly the train stations. The latter applies in particular to Charleville station, which is situated ca. 1km outside the town. At a medium distance, there should be dedicated cycling infrastructure set up to connect the neighbouring towns of Charleville and Buttevant, to strengthen their combined role of a sub-centre hallway between Limerick and Cork, in the same way as Mallow.

Cycling (and walking) infrastructure should adhere to the latest standards (DMURS, National Cycle Manual, ...) and should be convenient, safe and as direct as possible. A high proportion shall be designed as segregated paths, physically protected against motor traffic. Within towns, the design for active travel infrastructure should avoid shared facilities between cyclists and pedestrians, as recommended in the NCM, while outside towns individual solutions can be found, depending on predicted footfall. Safe routes to schools should be a number One priority.

The subsequent redesign of urban streets shall go along with a people centres high quality design of the public realm, including urban green in the street space. The new active travel infrastructure must be safe and convenient for people of all ages and abilities. The needs for people with reduced mobility shall be met in all projects that include infrastructure for active travel.

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Adding dedicated cycling infrastructure to the existing N20 road for longer distance connections we would see as a lower priority. Long distance cycling would primarily serve recreational purposes, for which in return cycling along a busy main road would be less attractive than more scenic route options. For medium distance commuting (10-15km), however, a segregated cycle path along the N20 should be built where suitable ('cycling highway').

Accompanying measures

A comprehensive and holistic approach to multi-modal travel shall be taken in connection with the upgrade of train and bus services and the development of active travel infrastructure. Public transport nodes, especially the train stations, must be easy and comfortably to reach by walking and cycling. High quality bicycle parking must be provided at bus stops and train stations. Bus stops and train stations should become attractive local "places".

Convenient P+R facilities shall be developed at the stations (or significantly improved at Mallow) and well linked to the local road network, including easy access from the N20. An additional P+R strategic P+R facility in the approach to Cork shall be built at Blarney, and the train station be reopened as a priority.

For serving traffic demands that goes beyond Cork City (e.g. Little Island, Ringaskiddy), through running train services between Mallow and Midleton/Cobh – as proposed in CMATS - and direct express bus services through or around the City to serve Mahon and Ringaskiddy shall be established as a priority, along with a simple and attractive fare structure.

Environmental Considerations

We would encourage that the Phase 2 be used as an opportunity to identify the least environmentally impactful route, in order to minimise the need for mitigation during the Phase 3 design process and that all aspects of environmental impacts and mitigation be considered.

Natural Environment & Wildlife

Any development of this scale will have impacts on the local environment and associated habitats and species, both during the construction and operational phases of the development. In this regard we draw attention to the need to comply with the following legislation, particularly relevant to the Blackwater River SAC and the protected pearl mussel:

- EU Habitats Directive (92/43/EEC), which include, in Article 2 (2): Measures taken pursuant to this Directive shall be designed to maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of Community interest.¹

¹ Species of Community interest, listed in Annex II of the Habitats Directive, include the freshwater pearl mussel (*Margaritifera margaritifera* and *M. margaritifera durrovensis*), Atlantic salmon (*Salmo salar*), sea lamprey (*Petromyzon marinus*), river lamprey (*Lampetra fluviatilis*), brook lamprey (*Lampetra planeri*), Twaite

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and the following objective;

- Objective 1 of the National Biodiversity Action Plan, especially Action 1.1.3 - *“All Public Authorities and private sector bodies move towards no net loss of biodiversity through strategies, planning, mitigation measures, appropriate offsetting and/or investment in Blue-Green infrastructure”*.

As outlined above we are supportive of using as much of the current road infrastructure as possible which will also minimise the impact on the natural environment. A project of this scale also offers opportunities to not only avoid habitat fragmentation, disturbance, sedimentation of instream habitats and deterioration of water quality but to deliver through environmentally sensitive design improvements such as:

- Increase and strengthen natural green corridors. Planting of native species for hedging and habitat enhancement and to infill corridor gaps.
- Ensure that allowance is made to include adequate, and appropriately located, wildlife underpasses.
- Detailed analysis of habitat types and in particular protection of wetlands, one of the most biologically diverse habitats. Clogheen Fen, protected as a current day amenity and wildlife sanctuary, from the 1991 N20 Mallow Road construction.

Lighting

We ask that in respect of lighting design that the adverse impacts (on human health, wildlife and our natural night skies) of light pollution/ excessive illumination are prioritised in the design and the Dark Sky Ireland Circular, [Download](#), recommendations be adhered to.

Construction Materials

Where possible, in line with the Circular Economy Directive, construction materials to be sourced from reuse and repurposed stocks. Surface materials should be the best possible available for noise abatement.

Conclusion

We welcome the opportunity to feed into the N20 project at this early stage and commend the holistic, cross-modal approach in the plans. We expect that this approach will result in high quality multi modal solutions as a light house project for future proof transport in a cross-country corridor, connecting the 2nd and 3rd city in the Republic. We trust that our observations will be considered. It would be very

shad 25 (*Alosa fallax*) and Allis shad (*Alosa alosa*), all of which are found in Irish waters and all of which could be negatively affected by siltation.



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helpful that going forward, the further plans for the individual road design projects would be discussed with relevant stakeholders already during the design stage, before the formal public consultation (part 8).

Should you require any clarifications, please email me at tmfcork@gmail.com .

Kind regards

Stephan Koch

Transport and Mobility Forum - Chair

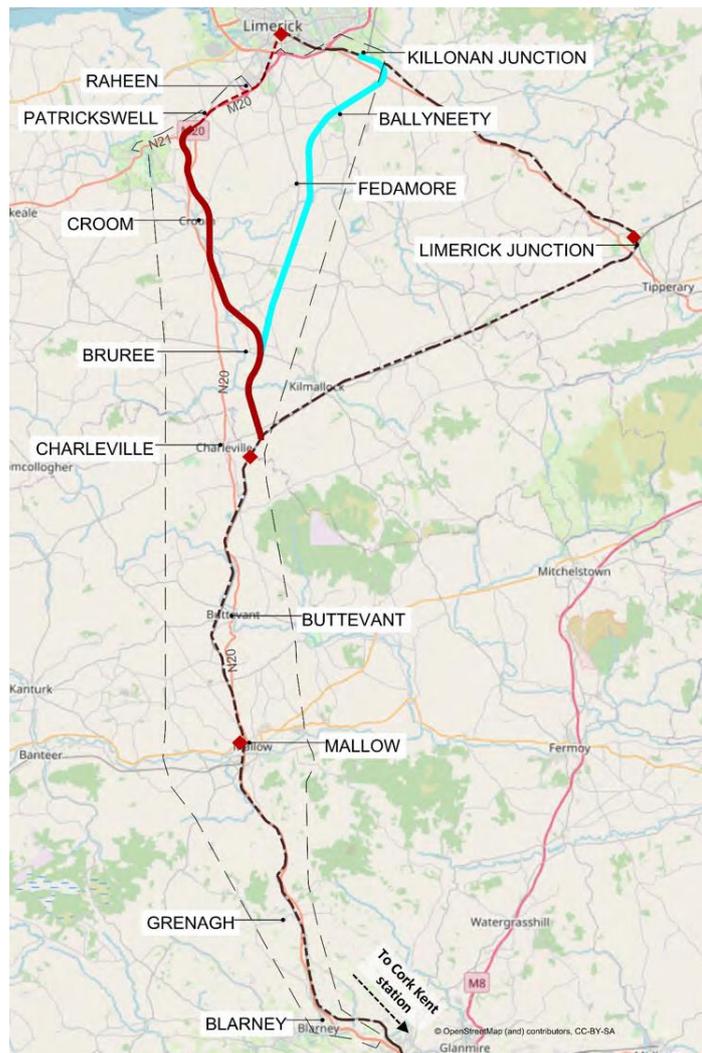
Note: *The comments within this submission are solely the view of the Transport and Mobility Forum (TMF) as a whole and not the opinion or view of any individual partner of the TMF.*

*) A full list of partners in the Transport and Mobility Forum can be found at

<https://transportandmobilityforum.com/partners/>

Appendix

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Road (left) and rail(right) based options (taken from the public consultation presentations)