

The Secretary
An Bord Pleanála (Strategic Housing Unit)
64 Marlborough Street,
Dublin 1

2nd August 2022

Re: Proposed SHD, Jacob's Island, Cork, Ref. 313919

Dear Sir/Madam,

The NTA has reviewed the subject proposed development and makes the following observations for the Board's consideration.

In regards to the subject proposed SHD at Jacob's Island, the National Transport Authority (NTA) would firstly, highlight the following matters for consideration, in relation to the Cork Metropolitan Area Transport Strategy 2040 (CMATS).

CMATS was undertaken by the National Transport Authority, in conjunction with Cork City Council, Cork County Council and Transport Infrastructure Ireland and was completed in early 2020. CMATS sets out an integrated transport planning policy framework for the Cork Metropolitan Area with supporting transport investment priorities. Its preparation has been informed at national level by the National Planning Framework 2040 and the National Development Plan 2018-2027. The delivery of CMATS is identified as a critical objective in the RSES for the Southern Region and the associated Metropolitan Area Strategy Plan (MASP) for Cork, which also came into effect in 2020.

CMATS sets out a phased implementation plan for the short, medium and long terms, which is intended to guide the progress of projects identified as being required to meet the anticipated demand for transport, in a manner which is consistent with the Strategy's objectives. Implementation of the transport strategy's recommendations will be progressed in line with the available funding assigned under the National Development Plan 2018-2027.

The CMATS report can be found in the following location: <https://www.nationaltransport.ie/cork/>

CMATS – Context for the location of the subject proposed development

In relation to the general location of the subject site, the transport infrastructure proposals and associated objectives identified in CMATS includes the following:

CMATS Land Use Priorities

Land use priorities are set out on pages 26 and 27 of the CMATS Report and, *inter alia*, include a strong emphasis on –

- The integration of new development at appropriate densities with high capacity public transport infrastructure in conjunction with more attractive walking and cycling networks and associated public realm improvements;
- Deliver consolidated development in a manner that can avail of existing transport infrastructure, nearby amenities and facilities in the short term to deliver a critical mass of growth in population and employment which can support the transition and sequencing of investment to higher capacity public transport infrastructure and services; and
- Land use policies that support the provision and design of new development in locations, layouts and at densities which prioritise walking and cycling and enable the efficient provision of public transport services.

Cork BusConnects

CMATS sets out the indicative BusConnects network, which includes a number of routes in the vicinity of the subject site. The NTA and Cork City Council have established a project team to develop BusConnects Cork. BusConnects is being advanced through two discreet but complementary processes – BusConnects Infrastructure and Bus Network Redesign.

BusConnects Infrastructure (Sustainable Transport Corridors)

Specialist design teams have developed concept designs for the Sustainable Transport Corridors that will support the efficient running of the bus services in the City. These corridors will provide not just bus priority, but also safe cycle and pedestrian facilities.

In June 2022, the National Transport Authority (NTA) published, for public consultation, the Emerging Preferred Route Options for the 12 Sustainable Transport Corridors of BusConnects Cork.

The proposed development is located adjacent to and is partially bounded by the proposed Corridor J (Mahon to City) as indicated in the drawings prepared for the emerging preferred route.

<https://busconnects.ie/cork/>

Bus Network Redesign

This comprises the design and planning of a revised and optimised network of PSO services for the Metropolitan Area, for implementation over the next few years. The New Network will include benefits such as an increase of over one third in bus services in Cork, shorter wait times and more direct routes and additional services at weekends.

The National Transport Authority (NTA) launched its new design for the Cork Metropolitan Bus Network in June 2022. It is envisaged that the New Network will commence in 2023 and be operational for the year 2024. The proposed development's location will be directly served by routes 4 and 14, with routes 1 and 11 serving the adjacent Mahon area.

<https://busconnects.ie/cork/busconnects-cork-new-bus-network/>

Light Rail

CMATS proposes the provision of a light rail line, extending from Ballincollig to Mahon, over a distance of 17km, with 25 stops, connecting with a number of key locations along its indicative route, including the City Centre, Kent Station, Docklands, CUH, Munster Technological University and UCC.

A specialist engineering team was appointed to undertake a route options analysis and develop initial designs for the proposed light rail line. This supports CMATS short term objective of identifying and protecting an alignment for the light rail scheme, allowing development consolidation along the corridor. The final stage of the option selection process is now being undertaken with the identification of 12 end to end route options, with the selection of an emerging preferred route targeted before the end of 2022, followed by a non-statutory public consultation process.

The design, planning and implementation of an interim high frequency bus service route and bus corridor priority measures along the alignment of a light rail line is also identified as being required, to serve transport demand in the short to medium term.

The indicative light rail route, presented in the CMATS report (p.71) terminates at Mahon Point.

Cycling

Under CMATS, it is intended to deliver a cycle network across the Metropolitan Area. Among the objectives relating to the short to medium term, CMATS proposes to align the implementation of the cycling network with the implementation of the BusConnects network; a feeder network and a permeability review to be undertaken and implemented. It is also stated that further cycle network implementation is to be aligned with new development opportunities and traffic calming. In regards to future investment in cycle network improvements, this is expected to benefit, in the short term from the Cycling and Walking Infrastructure Delivery Plan 2021-2025.

In the indicative Cycle Network Map (CMATS p.50), which is based on the Cork Cycle Network Plan, a number of routes are located in the vicinity of the proposed development, including a Primary route along the Mahon Link Road/Jacob's Island Access Road and the a number of Green routes to the south and west of the site.

Walking

CMATS' key objectives relating to walking are set out in Chapter 6 of the CMATS Report. Among the key outcomes for walking are included:

- An increase in walking levels for work, education and leisure across the CMA, particularly for short journeys (less than 2-3km);
- Supporting a high quality and fully accessible environment for all abilities and ages ... ;
- Addressing the safety issues and barriers that prevent citizens and visitors from walking more in Cork; and
- Promote a higher standard of urban design and permeability in new and existing development, and in highway design, in a fashion that consistently prioritises pedestrian movement and safety over that of the private car.

Roads

In regards to investment in road network improvements, CMATS states that new roads will be required in some cases, to unlock housing and commercial development and to support local access in planned

growth areas. New developments will therefore be served by existing and / or planned public transport and designed to maximise connectivity to local network and services. In this regard the ongoing development of the regional / distributor road network will be informed by *inter alia*, the need to provide sustainable access to development lands, provide walking and cycling linkages, provide access and priority to public transport routes and to support lower speeds and facilitate the concept of legibility using the design principles of DMURS (Chapter 13, p.89).

In relation to the requirements of the national road network, CMATS, consistent with national guidelines on Spatial Planning and National Roads, also states that 'secondary local function traffic on national roads can be tolerated insofar as it does not impact on the primary function, which is to cater for strategic traffic' and 'if secondary functions impact on the primary functions of national roads, then demand management measures will be employed to mitigate this impact'.

Vehicular access to the proposed development and Jacob's Island as a whole is provided by the Mahon Interchange with the N40 national road.

Appraisal and Recommendations

As indicated above, the location of the proposed development is expected to benefit from improved public transport services on the basis of BusConnects and LRT in the longer term. It is also expected to benefit from improved local connectivity to Mahon by walking and cycling modes through the implementation of CMATS' cycle network plan and the associated local connections as proposed by the applicant.

Whilst from this, it could be concluded that the provision for additional development in this area is complementary to CMATS' land use priorities, as outlined on p.26/27 of the CMATS report, this assumption needs to be tempered with the challenges still presented by the location's physical separation from Mahon by the N40, its proximity and dependence on the N40 Mahon Interchange and 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.

For this reason, taking the Spatial Planning and National Roads Guidelines into consideration, it is considered that the timing and phasing of further development in Jacob's Island, including the proposed development, should only be considered on the basis of the delivery of CMATS related public transport infrastructure and services along with the completion of local connecting walking and cycling infrastructure.

In this regard, any grant of permission and associated development phasing strategy needs to be aligned with the delivery of supporting transport infrastructure and public transport services.

Related to this, any grant of permission should be contingent on prior agreement with Cork City Council and the BusConnects project team to ensure that all aspects of the proposed development, including setback and access arrangements are consistent with requirements relating BusConnects. Equally, any grant of permission should be contingent on prior agreement with Cork City Council on

how high quality walking and cycling accessibility to local public transport nodes and other local destinations are going to be provided, concurrent with the development of the site.

Finally, the NTA would place a critical emphasis on the need for effective demand management measures to be applied to ensure that secondary local function traffic impact on the N40 national road can be minimised. In this regard, the NTA would not support the proposed parking provision for office. Rather, it is recommended that at a maximum, parking standard specified in the Cork City Development Plan 2022-2028 is applied.

Yours sincerely,

A handwritten signature in black ink, reading "Michael Mac Aree". The signature is written in a cursive, flowing style.

Michael Mac Aree

Head of Strategic Planning