

The Secretary

An Bord Pleanála

64 Marlborough Street,

Dublin 1,

D01 V902

Date: 18th June 2025.

From: Aidan Coffey

c/o **Portus Greenway Limited (t/a Harbour Link)**

Shanagarry North, Shanagarry,

Co. Cork

P25 PP58

Ref: Part 8 Planning Notice – **North Quays Public Realm & Transport Infrastructure**

Request for EIA Screening Determination:

Request for **EIA Screening Determination** and **Appropriate Assessment Screening Determination** on Part 8 Process, and further determination is the project process deemed “**Project Splitting**” of Cork Docklands Public Realm Framework, by purposefully splitting into 5 Bundles, with particular emphasis on current application, Bundle 1) **North Quays Public Realm & Transport Infrastructure, dated 28th May 2025**

In accordance with: Article 120 (3), as amended by S.I. No. 296 of 2018, any person, may within 4 weeks beginning on Wednesday the 28th May 2025, apply to An Bord Pleanála for a Screening Determination as to whether the development would be likely to have significant effects on the environment.

Introduction:

By way of introduction, Cork Docklands is set to deliver over 10,000 residential units before 2045 and are currently putting in place the framework plan for the implementation of the roads, public realm works and infrastructure frameworks and planning under Part 8, to allow this to happen.

This Framework Plan for the Docklands covers both North and South Docklands, along with adjoining roads and Active Travel Routes linking all sectors of Cork’s Docklands, but also to the wider city & transport objectives & plans, with links to Bus Connects Cork Emerging Preferred Routes, Kent Station Transport Hub, Harbour Link proposed commuter & tourist river transport service, Luas Cork proposed transport links and the wider Active Travel networks at Glanmire to City, Blackrock and Passage West.

Approach:

The **North Quays Public Realm & Transport Infrastructure Plan** is not a discrete project but rather a precursor and enabler to other much greater development activity which has a profound impact on the role of the river and its context for the urban environment of Cork City. In effect it represents project splitting in that planned development of three river crossings will be enabled by this development and these should be taken into consideration.

The current approach by Cork City and Docklands to split the design Framework Plan into 5 manageable stages, or in this case called “**Bundles**”. This approach totally disregards all adjoining sectors, including residential for 10,000 homes and employment initiatives for up to 25,000 people, along with Public Realm initiatives, Active Travel projects and major transport initiatives and thus splits the cumulative project to avoid an EIA.

Cork’s Docklands approach is purposefully broken down into “Bundles”, as set out below, which by its very own admission itself indicates project splitting.

- 1) Bundle 1) North Quays Public Realm & Transport Infrastructure
- 2) Bundle 2) South Quays Public Realm & Flood Protection
- 3) Bundle 3) Active Recreation, Sports & Public Realm
- 4) Bundle 4) South Docklands Transport Infrastructure
- 5) Bundle 5) Bridges

In short, the Cork Docklands Authority maintains there is no EIA required on the recent Part 8 application as Notified, in Bundle 1 on the 28th May Notice.

Cork City maintains, the **North Quays Public Realm & Transport Infrastructure Plan**, is under the threshold for either a mandatory or Sub-threshold requirement and does not reach the designated threshold limits and there after Cork City’s own screening process, have deemed it not necessary for an EIA.

Furthermore the AA Screening process, taking the same approach, requires an AA Screening Determination, including a full **Natura Impact Statement** as the current screening does not allow for the River Lee being designated as a Salmonoid River and its effect on the SPA. The current AA Screening has also not considered the complete project as a cumulative effect of the whole Docklands and Active Travel routes both joining & adjacent the North Quays, including the McMahon Builders yard, which are connected developments directly linked to the River Lee and consideration for the three planned bridges with risk of preventing Salmon Spawning in the upriver SPA at Gearagh and additional risk of flooding the city.

Under the EIA Guidance on Screening EU Commission 2017 report, The Docklands should be considered not as individual sites, but as a cumulative effect of all sites and furthermore should be considered in the context with the wider transport initiatives, linking Bus Connects, Luas Cork (and Luas Cork proposed bridges), Glanmire to City Active Ways. This current approach is a prime example of Project Splitting and the screening process that was carried out is severely flawed, as it purposefully omits the many major transport and active travel projects planned within the vicinity and adjoining the docklands project.

Prime Areas of Contention and reasons of significant effects on the environment:

Set out below are some of the general reasons as to why it appears this plan is deemed likely to have significant effects on the environment and also deemed **Project Splitting**, but also in need of a full EIA screening determination and Appropriate Assessment Screening Determination by An Bord Pleanála.

We also submit that the project planning is premature and with insufficient care and consideration for adjoining projects, but also for lack of consideration for European & National policy on infrastructure provision in keeping with national sustainable policy and vision.

- 1) No Integrated Traffic Plan (no regard whatsoever or joined up thinking with other projects ie, Luas Cork, Bus Connects, Sustainable River Transport, Kent Station Transport Hub or Glanmire to City Active Travel)**
- 2) Incorrect & Misleading EIA Screening & screening Determination Reports**
- 3) Incorrect & Misleading Appropriate Assessment Screening Determination Report**
- 4) Misleading Imagery**
- 5) No Traffic Impact Study**
- 6) No River Usage Study**
- 7) Lack of Car parking for Public Transport and Transport Hub**
- 8) Adjoining Active Travel Areas**
- 9) Linking with larger planned Framework**
- 10) Disregard for European & National Policy on Sustainable infrastructure for sustainability & Electric Charging Infrastructure**
- 11) Disregard for Failte Ireland City, Harbour and East Cork Destination & Experience Plan**
- 12) Disregard to the NTA Guidance document for EIA screening on projects provided and funded through the NTA**
- 13) Disregard for CMATS Smarter Travel Policy**

Cork is a Gateway City and having increased its boundaries in 2019, is in the midst of an exciting phase of development. The Cork Metropolitan Area (CMA) and the recently published National Planning Framework (NPF) 2040 envisages that Cork will become the fastest-growing city region in Ireland with a projected 50% to 60% increase of its population by 2040. Cork needs an integrated transport system of all sustainable transport modes, but not at the expense of disregarding all its heritage and maritime access.

1) No Integrated Traffic Plan (no regard whatsoever or joined up thinking with other projects ie, Luas Cork, Bus Connects, Sustainable River Transport, Kent Station Transport Hub)

First and foremost, flaw in the Docklands proposals and the city's transport needs, is that there is no one person or entity over the overall transport solution. Each individual entity of Bus, Rail, LRT, River and Road all appear to be devising their own system, with total disregard for all other modes.

Docklands is determined on connecting North and South Docklands and using a Luas styled Light Rail system bridge and Active Travel Bridge to connect both, when in reality, there is no joined up thinking at all, between Bus-Connect Preferred Sustainable Corridors which does not require any bridge. Active Travel users do not require a separate bridge, as being active travellers are capable and able to use the 31 existing bridges crossing the River Lee.

The overall cumulative effect has not been considered and hence the overall EIA has not been factored in.

Bus Connects preferred Green Corridors and Luas Cork Emerging Preferred Route both use Mahon Link Road, Skehard Road, Churchyard lane, **Alfred Street Depot**, Lower Glanmire Road, MacCurtain Street, Bridge Street, St Patricks Street, Grand parade, Washington Street, Western Road, Victoria Cross Road, Wilton Road, Bishopstown Road and Curraheen Road.

One has to question the validity of Luas Cork's emerging preferred route whilst using the same roads and passengers as Bus Connects. Is the population there?

Docklands is governed under the Cork City Council Docklands delivery office & LDA

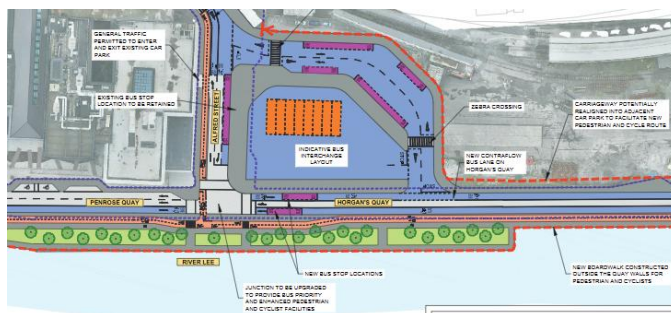
Bus Connects is governed by the NTA & National Development Plan and National Climate Plan 2030

CMATS is under the NTA National Transport Authority

Luas Cork comes under TII Transport Infrastructure Ireland

Trains and Kent Station under TFI Transport For Ireland

Harbour Link – A private commercial company, proposing an all-Electric Zero Emission Commuter and Tourist passenger ferry service, utilising the natural river, to link the Harbour and River communities and is totally disregarded as river transport does not come under the realm of the NTA.



There is no joined up thinking or integrated transport strategy, with no one entity to determine over the various bodies for a full integrated transport system for the city as a whole.

2) Incorrect & Misleading EIA Screening & screening Determination Reports

The Cork City Council North Quays Plan, states the EIA Screening & Screening Determination reports are complete. However the reports incorrect and misleading, as they state a “Screening Determination” has been carried out. This is untrue.

No Screening determination report has been carried out, as this in effect should only be done upon request by An Bord Pleanála.

Furthermore, the cities reports consider only minor planning applications in the near vicinity of the North Docklands only, ie: “Demolition of warehouse, Extension to Graveyard, Redevelopment of Customs House, Retention of roof for Southern Milling, Residential Development on Goulding’s site, Docklands Junction and a Pathfinder Scheme.

The report does not consider the cumulative effect of all proposed plannings under its very own developments and framework, ie all other proposed large scale developments to make up the 10,000 homes and employment for 25,000 people, the proposed hotel & events centre at Kennedy Quay or the Bus Connects Preferred Sustainable Corridors, Alfred Street Bus Depot & Kent Station Green Transport Hub for Bus Connects Electric Bus depot, Luas Cork, the Electrification of Kent Station Trains, the Glanmire to City Active Travel linking through the Docklands, Harbour Link River Transport Terminus and docking locations on both North and South Docks, Failte Ireland’s Maritime proposals for Tourism related Projects and Car Parking at Kent Station. Let alone the actual 3 bridges, as proposed by the Docklands.

Hence the current EIA screening report does not consider the cumulative effect, and thus misleading and untrue in its nature, which renders it incomplete and should be considered for a screening determination and full EIA.

3) Incorrect & Misleading Appropriate Assessment Screening & Determination Reports

The Natura 2000 network is a European network of important ecological sites, as defined under Article 3 of the Habitats Directive 92/43/EEC, which comprises both Special Areas of Conservation (SACs) and Special Protection Areas (SPAs).

The **North Quays Public Realm & Transport Infrastructure plan** is directly linked with the Docklands Development, Bus Connects Sustainable Green Corridors, Bus Connects Kent Station Transport Hub, the Glanmire to City Active Travel Greenway, and the Luas Cork (including the three proposed bridges). The AA Screening should have considered the cumulative effect of the combined areas as a whole for AA screening and not just localised planning.

Furthermore, the River Lee, along with Cork Harbour, also forms part of the Cork Harbour SPA

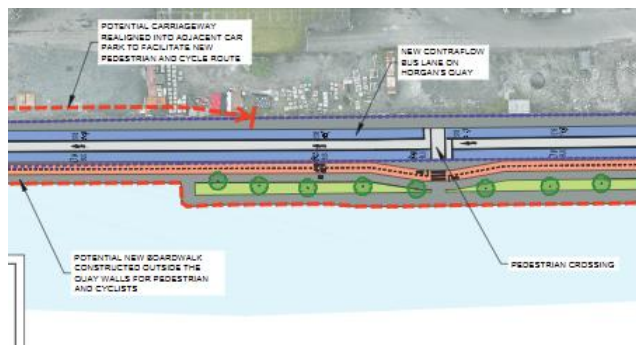
No consideration in the AA Screening Report considers the designation of the River Lee as a **Salmonoid River**, meaning it's importance for salmonid fish species and requires specific water quality standards to be maintained. Portions of the River Lee in Co. Cork are designated as a Special Area of Conservation (SAC) and a Special Protection Area (SPA), specifically up-river, at the Gearagh area on the River Lee designated as an SAC, with

particular emphasis on one of the few endangered natural Salmon Spawning rivers in Ireland.

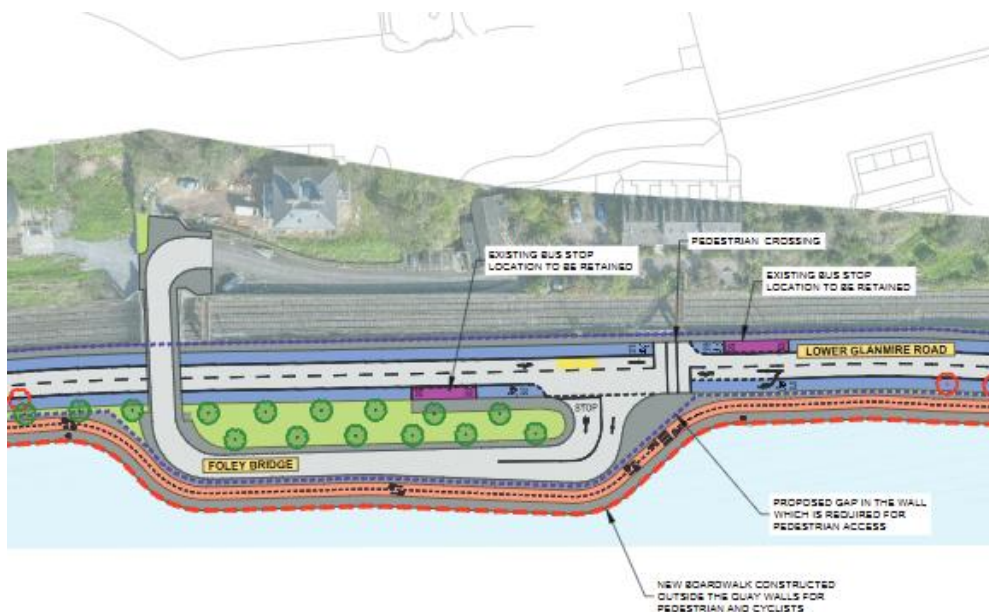
These designations highlight the importance of the River Lee and its surrounding areas for biodiversity and conservation efforts in the natural Salmon spawning conservation programs.

Additionally, the Glanmire to City Active Travel route adjoins the river Lee and SPA areas at Glanmire and along the riverbanks at Tivoli where both the Bus Connects Green Corridors and the Glanmire to City Active Travel and North Quays Public Realm & Transport Infrastructure plans intersect. The active travel route is planned to encroach on the river between the Skew Bridge (incorporating the new planned docklands Gateway Bridge) and the Eastern Gateway bridge at Bellevue Villas to infill & construct a boardwalk over a portion of the river banks & habitat area along the lower Glanmire Road directly linking to the plan.

The **North Quays Public Realm & Transport Infrastructure plan**, links the Bus Connects Green Corridors (& Glanmire to City Active Travel Plan), but which appears to purposefully omit the Active Travel encroachment at McMahon's Builder Providers yard, all of which should be considered under the combination effect for a Full Natura Impact Statement.



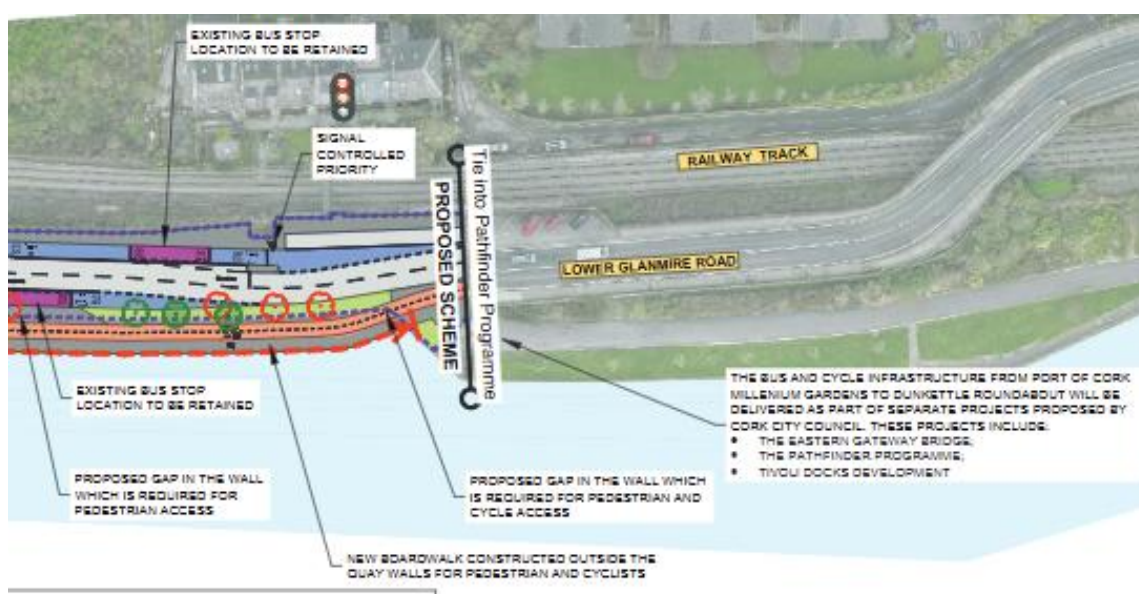
Images from both North Quays plan and Bus Connects Green Corridor Plan indicating encroachment of the River Lee habitat areas.



Bus Connects & Active Travel route outside the Quay walls encroaching on the River Lee SPA, links the North Quays Plan



New Boardwalk planned for construction for the Bus Connects & Active Travel route outside the Quay walls encroaching on the River Lee SPA, which directly links the North Quays Plan



New Boardwalk planned for construction for the Bus Connects & Active Travel route outside the Quay walls encroaching on the River Lee SPA, also linking the North Quays plan

The current AA screening report does not consider the cumulative effect of the adjoining Bus Connects and Glanmire to City Active Travel routes. In doing so ignores the habitat and salmonid river designation and hence is flawed, misleading and has untrue statements, which renders it incomplete and highlights the need for an AA screening determination and full Natura Impact Statement.

4) Misleading Imagery

The **North Quays Public Realm & Transport Infrastructure** and **Cork City Council Variation 2 Public Consultation** documents, presented on digital platforms and in print for

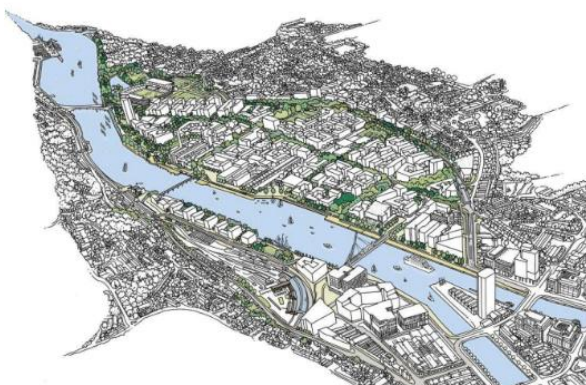
Public Consultations, depicts almost all images showing sizable vessels up River & in the River basin. This is not true and is contradictory with the docklands framework including the Planned Dockland bridges. This is misleading to both the Public Representatives, Stakeholders and the general public at large.

North Quays Public Realm & Transport Infrastructure Imagery all showing sizeable vessels



Images depicting large vessels along the river basin up-river from the Active Travel bridge, with no images of the actual planned bridges in sight. This is misleading and untrue.

Cork City Council Variation 2 Public Consultation document Images



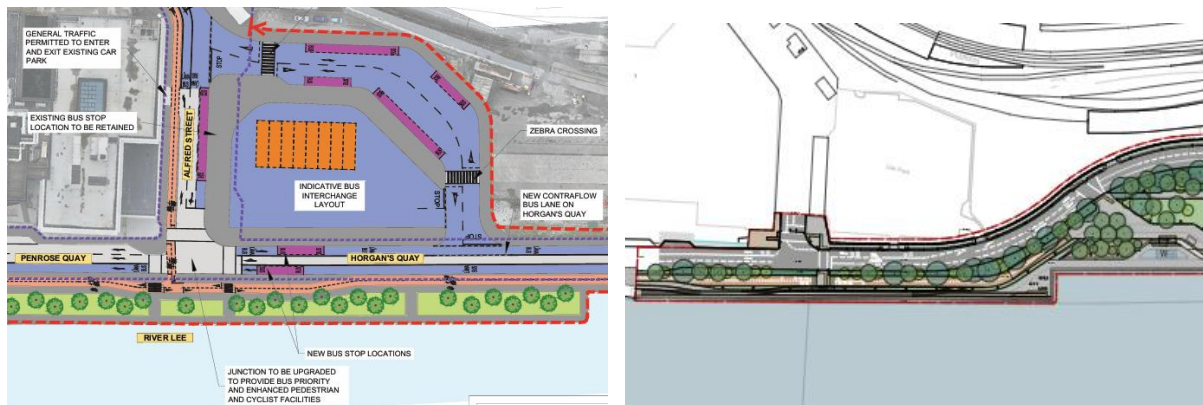
Images depicting large vessels and yachts along the river basin up-river from the Active Travel bridge and even depicting a larger ferry type vessel above the Kent Bridge, which will not be possible. This is misleading the public & representatives.

This misinterpretation of imagery is very misleading to both the Public Representatives, Stakeholders and the general public at large and further emphasises the need for a screening determination and river user's study.

5) No Traffic Impact Study

The proposed **North Quays Public Realm & Transport Infrastructure** primarily forms part of the new Re-aligned Horgan's Quay road / Alfred Street junction, where a proposed Luas tram (40 mtrs in length), will pass every 3 minutes from the start of operations (with more frequency planned), this includes a 30 second dwell time at traffic lights for every tram, which means traffic signals will change every 2.5 minutes and traffic in general will be severely affected.

Furthermore, this junction links with the current planned New Bus Connects Green Route Depot on Alfred Street (Kent Station Transport Hub), using the same junction with Buses also exiting every 3 minutes as this depot forms a critical part of the new proposed sustainable transport corridor. Both Bus Connects plan & Luas Cork claim priority on Traffic Signals, see extract of Bus Connects image below.



The current Bus Connects Transport Depot on Alfred Street, including the Transport Hub, claiming priority at the junction signals. Second image is North Quays re-alignment, not showing any bridge or Bus Connects Depot or Transport Hub. The imagery is misleading and who get priority. Furthermore this is a National N8 transport route to the city.

The North Docklands proposal for the re-alignment of Horgan's quay is now proposed to have two separated bus lanes and just one lane for general traffic, along with cyclists and then add the Bus Connects Green route from the Kent Depot and Alfred Street Depot. If the Docklands proposed Bridge (Luas Cork) is built, it will add more congestion and then the Harbour Link Terminus will also have to be located at this juncture, add in the Active Travel pedestrians and Cyclists and presto giving a recipe for total congestion.

Questions to be asked of integrated transport system

- Where is all this traffic going to go ?
- Who gets priority ?
Bus Connects Sustainable Transport Corridor, Bus Connects Sustainable Bus Depot, Luas Cork, NTA N8 city access road or Active Travel pedestrian & cycleway



Current Bus Connects preferred Green Roue depot on Alfred Street and the Sustainable Transport Hub at Kent station & TFI Green Bus Connects departing current Alfred Street Bus Depot, where Luas Cork now plans to live.

There is confusion as to who gets priority and access to Alfred street for a current Bus Connects depot or a planned Luas Cork stop, plus who get priority on the traffic signals.

Without a full integrated Traffic Impact Study it is impossible to determin the full extent of the impact on such a critical junction entering the city for all users.

This is further evidence of the need for the project to be considered for a screening determination and in the combination effect a full integrated Transport Plan including a Traffic Impact study and requirement of an in depth EIA screen determination.

6) No River Usage Study

It really is highly unusual and premature that **North Quays Public Realm & Transport Infrastructure**, proceeds with a Part 8 application, presented to the city management, public and councillors to promote the inclusion of the entire length of Horgan's Quay without a River Usage Study and completely disregard the very Maritime Heritage the city was built on and ignores the services the river can bring to enhance this location of the river, in terms of Public Access, Usage, Visiting Craft, Commuter transport, Sporting Active Leisure, Tourism and overall maritime heritage of the city.

Surly any plan to cut off the heritage of Cork City's main existence from its strong maritime links and heritage without any consideration of a river usage study, is ill conceived.

Cork promotes itself as a Maritime Heritage city, the City Moto is "**Statio Bene Fide Carinis**" meaning "**a safe harbour for ships**".

Yet, the draft Variation 2 of the city development Plan, and North Quays Plan is looking to cut off the very existence of the city and make it impossible for future generations to gain access to the river, let alone any safe harbour or safe operation of any level of activity on the river.

Furthermore, the river itself should be considered for its active travel and leisure capabilities. Any transport infrastructure enabling bridges across the river and any adjoining transport & infrastructure plans should incorporate the combined effect of all transport users.

“Statio Bene Fida Carinis”, the Cork City maritime heritage & the cities very existence



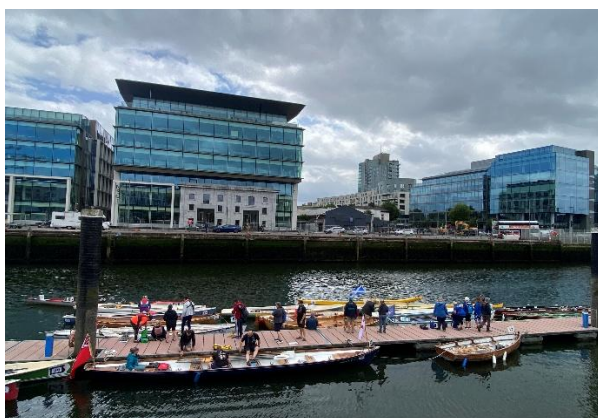
Image of Cork City Moto “safe harbour for ships”



Existing River user boats at the City Quays



SUP boarders and canoes on River Lee city basin for the Cork Ocean to City Race in May 2025



Rowers preparing at for racing on Customs House Quay pontoons



Canoes & Research Vessel at City Basin May 2025



Vessels moored at Albert Quay during the Cork City sponsored European Maritime Day, the Bow of the Governments Coastguard Vessel Granuaile on the left is where the planned Luas Cork Bridge will cut across the City Basin



Harbour Link planned Zero Emission Commuter & Tourist ferry service for Cork city and harbour linking directly into the city basin, with plans for four commuter and tourist vessels to start 2029



Tom Crean & Irish Naval vessel LE Aoibhinn at Albert Quay & European Fishing Vessels at Horgan's Quay May 2025



Fishing Vessel Penrose Quay June 2025



Research Vessel at Horgan's Quay June 2025,



Cruise Liner on Horgan's Quay May 2025



Trawler at Albert Quay June 2025



Cork Harbour Cruise and Sailboats at Customs House Quay North Jetty May 2025



& Visiting Tall Ship at Customs House Quay South Jetty May 2025 for European maritime day and Cork City & harbour Festival



Rowers Training at City Basin Saturday April 2025



Rowers training North Channel Penrose Quay April 2025



Tall Ship at Customs House Quay with many visitors queuing



LE Aoibhinn at Albert Quay with many visitors queuing



Planned Luas Cork Bridge across the City basin & the Planned Luas Cork Bridge joins North Quays Public Realm sterilising the city basin and risk of flooding city, and decimating the cities heritage.

The **North Quays Public Realm and Transport Infrastructure**, boasts a 6,000 sq mtr park with a water feature, yet, turns its back on the most usable and attractive natural water feature within the city, which is the River Lee itself with over 900 mtrs of accessible quay on Penrose Quay, Fishguard Wharf and Horgan's Quay, Albert Quay, Kennedy Quay, and the Customs House North and South Jetty Quays, including the city basin.

The planned Luas Cork Bridge, Bus Connects Depot, Active Travel routes and river users, all need to be considered as a combined effect and more consideration for River Users and their activities, along with the heritage of the quays and river basin.

This is further evidence of the requirement of an EIA Screening Determination and AA screening Determination for a full River Usage Study and Natura Impact Statement, as part of a full integrated EIA and AA.

This also indicates the need for the whole Docklands to be considered as a whole cumulative effect and not for the projects to be split by "Project Splitting".

7) Lack of Car parking for Public Transport and Transport Hub

The Bus Connects Kent Station Green Electric Bus Depot is planned to take away the vital Kent Station Car Parking. **The North Quays Public Realm & Transport Infrastructure plan**, proposals have no allowance for car Parking for the Train Station, Luas Cork, Bus Connects or general traffic from entering the city that wish to use public transport. The opportunity exists to develop sustainable park and ride facilities at the Transport Hub, yet this is disregarded.



Sustainable Parking a missed opportunity

This is more evidence of the requirement of an EIA Screening Determination including a Traffic Impact study and a full integrated EIA.

8) Adjoining Active Travel Areas

The **North Quays Public Realm and Transport Infrastructure** directly links with the Cork City Council planned “**Glanmire to City Cycle Route, Phase 2**”, which boasts a 5 klm Walking and Cycling route, including 2 new Pedestrian Bridges.

But which also links with the already commenced, as evidenced by the **Glanmire to City Active Travel route (Phase 1 & 2)**, documents as stated below.

“The proposed facility will provide a safe pedestrian and cycle route that extends from the city Centre to Glanmire, Little Island, Carrigtwohill and surrounding area. The proposed facility will eventually form part of an inter-urban greenway that will link Cork and Waterford Cities.”

Extract from the City prepared document “Glanmire to City Cycle Route (phase 2)

[Glanmire to City Cycle Route Phase 2 S](#)



5km route from City Centre to Dunkettle



Pathfinder Cork-Waterford Route

This is further evidence of the cumulative effect and requirement of a Screening Determination and AA screening determination, including a Full integrated EIA, Traffic Impact Report and Nutra Impact Statement, as the North Quays project is clearly directly linked to wider developments than just a mere demolition of a building and replacement of a new roof in localised planning.

9) Linking with larger planned Framework

The North Quays Public Realm & Transport Infrastructure, links with a much larger framework objective.

This Part 8 application states even within the scope of the **“Project Brief”**,

“Deliver urban realm, public open space, and transport infrastructure within the North Docks area in accordance with the vision and objectives of the Cork City Development Plan (2022-2028), the Cork City Docklands Framework Masterplan (2023) and the Cork Metropolitan Area Transport Strategy (2020).

•
Reflect the maritime and industrial heritage of the Docklands in the public realm, in accordance with the Cork City Docklands Framework Masterplan (2023 Draft).

Deliver the northern portion of the Kennedy Spine Urban Amenity Linear Park as outlined in the Cork City Docklands Framework Masterplan (2023, Draft).

•
Provide a multi-modal transport infrastructure which facilitates access to walking, cycling and public transport and acts as a catalyst for further private development in the area.

This is further evidence of the requirement of an EIA Screening Determination and Full integrated EIA, as the North Quays project is clearly defined and linked with a wider overall Docklands Master-Plan and Metropolitan Framework, along with linking with other large scale planned developments.

10) Disregard for European & National Policy on Sustainable Infrastructure for Electric Charging

No allowance has been made to for provision of sustainable infrastructure for charging of Electric Vehicles, ie: Train, Bus, River transport, Bus or Car Charging.

The **North Quays Public Realm and Transport Infrastructure**, disregards **both The European & National Development Plan** policy of allowance for provision for sustainable infrastructure.

“The national policy on sustainable infrastructure aims to ensure that infrastructure projects are environmentally friendly, economically viable, and socially responsible, while also being resilient to climate change”.

This is further evidence of the requirement of an EIA Screening Determination and Full integrated EIA, as the North Quays project is clearly defined and no consideration for infrastructure for sustainable transport.

11) Disregard for Failte Ireland City, Harbour and East Cork Destination & Experience Plan

The **North Quays Public Realm and Transport Infrastructure**, disregards the Failte Ireland Plan developing tourism for the City and Harbour regions, by excluding any access to the river for tourist related activities. Extract from Failte Ireland Plan below.

“The Cork City, Harbour and East Cork Destination & Experience Plan builds on existing projects and connects all related investment activity with the potential to impact on the visitors experience of Cork. This includes projects currently underway, projects featuring in existing plans and new concepts designed to grow the leisure tourism base within Cork City, Harbour”

[b4095eba-25f8-4328-b2db-f1d1b3143ffc.pdf](#)

This is further evidence of the requirement of an EIA Screening Determination and Full integrated EIA, as the North Quays project is clearly defined and no consideration for social inclusion and biodiversity by providing infrastructure for tourism activities.

12) Disregard to the NTA Guidance document for EIA & AA screening on projects provided and funded through the NTA

The **North Quays Public Realm and Transport Infrastructure**, disregards the NTA's very own guidance on provision of a full EIA for large scale Active Travel and Infrastructure projects.

[NTA-Guidance-for-EIA-and-AA-Screening-Final-241023.pdf](#)

5.4.1 The Part 8 Process

As set out on page 27 below, Local authority own development which is "screened in" for appropriate assessment cannot proceed under the 'Part 8' process (Section 179(6)(e) of the 2000 Act). Where appropriate assessment is required, an NIS must be prepared and an application for approval must be made to An Bord Pleanála.

This is further evidence of the requirement of a Screening Determination and full integrated EIA and AA and NIS, as the North Quays project is not in line with the NTA national policy.

13 Disregard for CMATS Smarter Travel Policy

The **North Quays Public Realm and Transport Infrastructure**, disregards the CMATS Smarter Travel policy of –

"A Sustainable Future Smarter Travel which sets clear targets which have informed the preparation of CMATS".

Waterborne transport is in line with Government policy setting its vision for sustainability in transport and sets out five key goals through CMATS smarter Travel Policy:

- (i) to reduce overall travel demand,
- (ii) (ii) to maximise the efficiency of the transport network,
- (iii) (iii) to reduce reliance on fossil fuels,
- (iv) (iv) to reduce transport emissions
- (v) (v) to improve accessibility to transport.

All this together is further evidence of disregard for CMATS Smarter Travel Policy and further disregard for Waterbourne Transport proposed by Harbour Link and how a screening determination and AA determination should be carried out including a full integrated traffic plan and River Usage Report.

Conclusion:

The **North Quays Public Realm and Transport Infrastructure** part 8 plan is premature, misleading, incomplete screening process for both EIA and AA screening , misleading imagery and incorrect process and approach leading to Project Splitting to achieve the aim of giving the illusion of correct due process.

Furthermore, the part 8 plan, ignores the NTA Guidelines for EIA and AA screening and determination, along with ignoring the requirements of the National development Plan and other state agencies such as Failte Ireland, and is persistent in pushing forward with an ill-conceived and premature plan.

Portus Greenway Limited respectfully requests the Board to consider the plan for EIA Screening Determination and Appropriate Assessment Screening Determination, along with a consideration if the approach by Cork City Council Docklands Authority, is deemed project Splitting.

Yours Sincerely

Aidan Coffey

Director

Portus Greenway Limited

t/a Harbour Link

