



## **Cork Chamber submission to N/M20 Cork to Limerick Improvement Scheme**

January 15th, 2020

## 1. Introduction

Cork Chamber is the leading business representative organisation in Cork, proactively working to identify and progress developments that are facilitative of sustainable economic development. Representing an employer base of close to 1,200 businesses and over 100,000 employees across the region, Cork Chamber is the largest business representation organisation in the south of Ireland. We take this opportunity to commend the M0 project team, Limerick City and County Council, Cork County Council, Cork City Council, Transport Infrastructure Ireland, and the Department of Transport for initiating a robust N/M20 Cork to Limerick route corridor improvement scheme proposal and strongly welcome the integration of sustainable and public transport infrastructure considerations. This represents a prudent and fiscally sensible approach to the development of long-term infrastructure solutions between Ireland's second and third tier cities, securing competitiveness of the Cork and Limerick economy, positively impacting local economies situated along the transport corridor, and positively supporting social and environmental sustainability with the active travel integration.

## 2. United Nations Sustainable Development Goals

This submission has been guided by our commitment to the UN Sustainable Development Goals.<sup>1</sup> Five specific goals have been identified which we actively advocate for throughout our work;



This commitment is supplemented and further developed through our Sustainable Cork Programme which focusses on a sustainable and resilient recovery for Cork, and which is developed in considerable detail through significant member and community engagement in our Building Economic Resilience report which sets forth a strong and sustainable vision for the future of Cork.<sup>2</sup>

## 3. Programme for Government

This submission takes place in the context of the National Development Plan review which will be framed at least in part by the reality of a progressive new Programme for Government (PfG)<sup>3</sup>, which sets out that:

<sup>1</sup> <https://www.un.org/sustainabledevelopment/sustainable-development-goals/>

<sup>2</sup> <https://www.corkchamber.ie/wp-content/uploads/2020/07/Sustainable-Cork-Programme-Building-Economic-Resilience.pdf>

<sup>3</sup> [https://www.finegael.ie/app/uploads/2020/06/ProgrammeForGovernment\\_Final\\_16.06.20-1.pdf](https://www.finegael.ie/app/uploads/2020/06/ProgrammeForGovernment_Final_16.06.20-1.pdf)

“We are committed to a fundamental change in the nature of transport in Ireland. Necessary improvements in climate impact, quality of life, air quality and physical and mental health demand that every effort is made by the Government to make active travel and public transport better and more accessible. Each local authority will be immediately mandated to carry out an assessment of their road network, to see where space can be reallocated for pedestrians and cyclists.”

The PfG includes support for an integrated network of greenways, and a commitment to a 2:1 ratio of expenditure between new public transport infrastructure and new roads over its lifetime, maintained in each Budget by the Government. In relation to safety, Government commit to a new road safety strategy focused on reducing death and injuries of vulnerable road users, pedestrians, and cyclists and N/M20 upgrade must focus on this.

#### 4. Immediate Context

In 2017, Cork Chamber and Limerick Chamber commissioned a socio-economic assessment of the potential impact of the M20 scheme<sup>4</sup>. The assessment highlighted the following key benefits that would arise from completion of the M20 Cork to Limerick transport corridor:

- The current N20 is under significant capacity constraints due to the recent growth in traffic volumes.
- Several locations on the current N20 have seen traffic levels at over 120% of capacity in 2017.
- Development of the M20 would provide a Blarney to Patrickswell journey time of approximately 47 minutes.
- The M20 scheme would prevent approximately 118 accidents per annum, which could result in an annual monetary saving of €12.4 million.
- These transport benefits would also underpin the competitiveness of the South-West and Mid-West Regions, through enhancing internal and external connectivity, and improving productivity.
- The M20 would facilitate the development of a Cork-Limerick ‘twin-city’ region, which would provide a complement to Dublin in the context of the National Planning Framework, and the wider Mid-West and South West Regions (including Kerry) and the Atlantic Corridor.
- The M20 scheme would provide enhanced labour market connectivity for the 273,000 people in the wider catchment’s labour force. The motorway would increase the labour force within a 45-minute commute of major employment centres by an estimated 23% to 243,000 people.
- The M20’s role in enhancing the environment for FDI and indigenous investment has the potential to support an estimated additional 4,000-5,400 direct jobs in the region. In gross terms excluding displacement impacts, these additional direct jobs could provide an annual gross exchequer impact of up to €128 million, depending on the nature of investment attracted.

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<sup>4</sup> <https://www.corkchamber.ie/wp-content/uploads/2018/04/m20-executive-summary-june-2017.pdf>

- The M20 would deliver improved capacity to serve the external trading and connectivity requirements of businesses and tourism in the South-West Region, including through expanding the catchment areas of Cork and Shannon Airports, and the major ports of Cork and Shannon Foynes.
- The scheme would increase the accessibility of the wider South-West and Mid-West Regions for overseas and domestic tourism visitors.
- The M20 would deliver social and community benefits, including reduced stress and improved quality of life for commuters, and enhancing employment opportunities for residents in more remote locations.

Published in 2017, the benefits outlined in this assessment continue to ring true. What has changed contextually in the intervening years is the global acknowledgement that we are in a climate emergency, with the Irish government officially declaring a climate emergency in 2019. There is an urgent need for Ireland to transition to a sustainable, resilient, and carbon neutral society. Climate action will define the economic resilience of Ireland in the years and decades to come.

The development of a fit-for-purpose N/M20 transport corridor is key to delivering competitiveness and economic benefit to the Cork, Limerick and regional towns along the route corridor. In addition to this, and taking account of environmental and social considerations, Cork Chamber recognise the inherent value of complementarity between a road, rail and active travel based approach and recognise the need to ensure transport resilience, and the opportunity herein to meet the latent potential for public/sustainable transport commuting along this transport corridor. We strongly support the integration of active travel networks along the corridor as a critical element for supporting sustainable regional development.

The commitment to comprehensive upgrade to the N/M20 transport corridor must now be progressed to action.

### GHG emission reductions

In 2020, the Irish government committed to an average 7% per annum reduction in overall GHGs from 2021 to 2030, equating to a 51% reduction over the next decade and net zero emissions by 2050. Currently we are significantly off target in meeting our GHG emissions reduction targets with 2030 and 2050 commitments posing a substantial challenge across the board. Transport and Energy are of particular note, along with Agriculture, as being the three top emitters of harmful GHG's.

At the outset, we commend and strongly support the emphasis on public and sustainable transport in complementarity with the options proposed for the redevelopment of the N/M20 road-based corridor. Pursuing road improvements in isolation does not take account of the reality of our climate crisis, and the reality of our population growth projections for Ireland, and Cork, as set out in Ireland 2040. There is an absolute necessity for multimodal transport to service this projected demand.

We must establish an infrastructure that provides options and does not consign current and future generations exclusively to reliance on the car, growing congestion (whether fossil-based fuel or

electric etc, without alternatives vehicular traffic will exponentially increase in line with population growth, thereby growing congestion, and decreasing quality of life attributes ) and further avoidable air quality and environmental degradation.

The Cork Metropolitan Area Transport Strategy puts Cork in a unique position to transform mobility and sets forth a policy blueprint from which to develop and implement detailed interventions in our mobility network. CMATS and its support of sustainable and public transport options is a game changer for region. It is essential that the final infrastructure solutions chosen align seamlessly with the objectives of CMATS and LSMATS with transport hubs facilitating the interchange of commuters and visitors alike on to alternative mobility options e.g., shared bicycle scheme, light rail. These developments are of absolute and total importance to the creation of a functioning transport corridor that integrates with its destination points, and which also adheres to the goal of sustainable development thereby facilitating an attractive environment for investors and an enjoyable environment for residents alike. The complementary development of the Cork North Ring Road linking to the N/M20 should be progressed in parallel to the N/M20 redevelopment.

We highlight that due consideration must be given to projected GHG emissions in the form of embedded energy i.e., the carbon footprint from the embedded energy/carbon of the raw materials used for construction are appraised to determine the appropriate infrastructure solutions, or combination of solutions. For example, while efforts are being made to decrease the carbon footprint of cement production, it is a significant source of global CO<sub>2</sub> emissions, generating around 2.2 billion tonnes of CO<sub>2</sub> - equivalent to 8% of the global total in 2016<sup>5</sup>. We advise that that all materials and processes used in the completion of this scheme are assessed against environmental sustainability and a green procurement protocol. It is crucial that the transport corridor supports sustainable economic development, aligning with environmental, and social/ community sustainability and the global efforts to reverse our climate crisis.

### Brexit/ UK-EU TCA

The N/M20 route corridor is of national and regional significance. It provides a valuable function as a commuter route within the metropolitan area and as an inter-regional route connecting Cork and Limerick, for haulage, goods, and service provision. The significance of which is acknowledged in the National Development Plan and the RSES.

In the context of Brexit, the development of robust interregional infrastructure is essential, with the connectivity between Cork and Limerick thus far neglected. The development of a viable fit-for-purpose N/M20 transport corridor will be influential in Ireland's competitiveness, facilitating a strengthened, connected and increasingly resilient regional economy and counterbalance to the Greater Dublin Area. The Atlantic Corridor from Cork to Limerick is critical for the transport of commercial goods, and seamless access on a safe and efficient transport route must be actioned with urgency, to enable the ever-increasing importance and strategic significance of our port and general

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<sup>5</sup>[https://www.epa.ie/ghg/manufacturing/#:~:text=In%202019%2C%20total%20emissions%20\(combustion,87.3%25%20from%202011%20to%202019.&text=F%2DGas%20emissions%20were%20down,decrease%20of%2013.8%25%20in%202018](https://www.epa.ie/ghg/manufacturing/#:~:text=In%202019%2C%20total%20emissions%20(combustion,87.3%25%20from%202011%20to%202019.&text=F%2DGas%20emissions%20were%20down,decrease%20of%2013.8%25%20in%202018)

logistical infrastructure. Investment in appropriate connecting infrastructure, essentially capitalising on a twin-city approach will enhance the overall competitiveness of the South West and our national economic strength and competitiveness.

The predicted population growth in Cork will be driven by an influx of talented people encouraged by all that our natural, social and economic environment has to offer. Economic resilience is key and building on existing strengths requires us to look to our established sectors with the same enthusiasm and facilitative environment that created our economy in the first place. We can't be complacent about what we already have, or about what we may achieve with strategic planning.

Upgrades which remove congestion from regional towns is a crucial and very strong aspect of the improvement scheme proposal with the removal of heavy traffic enabling enhanced economic potential in regional towns. Supporting complementary locations, instead of through traffic routes. This will enhance safety and support our regional towns to reclaim their streets, town character, and uniqueness, to create safe, permeable, and accessible towns and communities for residents and visitors alike. Also significantly bolstering the tourism potential of regional towns. It is essential that the connecting sustainable infrastructure from the proposed greenway corridor, connects safely into these towns with safe junctions, clearly defined and segregated pathways, and pedestrian/cyclist prioritisation.

### Covid-19

The Covid-19 pandemic has been influential in heightening the criticality of mobility and safety. Enhanced options and connectivity improvements are to the fore in the discussions across the country. People need safe options and space to traverse their localities. The N/M20 transport corridor is a significant transport asset, however, it is essential that cycle and pedestrian infrastructure and sustainable transport options are robustly pursued and implemented with accelerated urgency. The importance of the N/M20 is clear, but it must be considered as central to a suite of important multimodal transport assets along this route.

#### **Background context:**

- Global climate crisis and GHG emission reduction targets
- Brexit
- Covid

## 5. Cork to Limerick transport route options

**Based on the assessment of the road-based options, and in a scenario that only delivers road-based connectivity**, Cork Chamber supports that the most suitable option is Road Based Option 1, based on the most appropriate route as chosen by the M20 project team. We do not have specific preferences regarding the elements that make up the route. This assessment is based on the Cork to Limerick transport corridor being specifically advanced as a roads-based project.

**In the scenario which delivers a combination of road and significant rail infrastructure and service investment,** Cork Chamber acknowledges the opportunity herein to maximise the connectivity potential and complementarity of the Cork to Limerick transport corridor and the potential to support enhanced public and sustainable transport connectivity options. Cork Chamber recognise the potential of Road Based Options Part 2.

**However, if the pre-requisite rail investment for additional infrastructure and services enhancement is not forthcoming to encompass additional stations and carriage capacity, and if this cannot be feasibly delivered in parallel with the redevelopment of the N/M20 road corridor, then there is no option but to deliver Road Based Options Part 1, as set out above.**

A combination of a road, and rail-based solution offers a comprehensive approach, with capacity based on projected population growth. In achieving an enhanced offering of both, we will feasibly increase the overall and long-term competitiveness and attractiveness of the region to sustained investment and as a location with a strong emphasis on quality of life.

In reference to the rail-based options proposed, Cork Chamber are supportive of a direct no change option with much enhanced service frequency and reduced journey time. Rail-based option **RS 2a** may offer the optimal route for commuting and business travel with the former Limerick to Foynes rail line situated adjacent to the business activity zones of Raheen and Dooradoyle. There is an opportunity to encourage more sustainable transport commuting, with the integration of fit-for-purpose modal interchange hubs at each station and with affordable commuter fares. The existing rail services runs approximately every hour between Cork and Limerick and takes on average 100 minutes is not fit for purpose, requires passengers to change depending on the schedule and does not encourage a modal shift or synergies between the city regions.

There may be opportunity in providing sustainable transport options for commuters and business travellers and to encourage as much modal shift as possible. In parallel, enhancing and investing in the road-based route to meet the needs of commercial, freight, commuting and leisure activity is essential. From a tourism and hospitality perspective, improvements along this route will greatly assist in providing a cohesive and accessible Atlantic Corridor product offering.

The delivery of an enhanced transport corridor between Irelands second and third tier cities, and the delivery of the Cork Metropolitan Area Transport Strategy is crucial for the progressive and sustainable development of the Cork region as a thriving, living city region for all.

Direct city centre to city centre rail connectivity would significantly enhance the development of complimentary economic activity between Cork and Limerick, enhancing and normalising exchange of service provision and true viability of a talent pool based across both city regions. It also has potential to bolster the move towards City Centre living and investment as set out in Ireland 2040, creating truly vibrant city based communities.



With changes there is also great potential for town to city commuting. The Mallow to Cork service could facilitate more sustainable commuting patterns for North Cork residents. This currently sits within the InterCity fare pricing structures. Mallow is a key residential zone in North Cork with Census 2016 reporting Mallow as a major commuter location for workers accessing Cork city and suburbs daily. In recent years rail passenger numbers have increased on services between Cork to Mallow, Cobh and Midleton, demonstrating already the growth potential for rail. As Cork grows, so does the daily commuting workforce, and here lies the opportunity.

There is also a significant opportunity to progress existing strategic plans and develop a station at Stoneview to facilitate the jobs growth and residential development opportunities at Blarney Business Park and Stoneview respectively, aligning with the CMATS suburban rail investment priorities, and the strategic objective to increase the number of Park and Ride locations across the Cork metropolitan area. Again, and as with Mallow, Stoneview is a strategically significant location for facilitating a transport modal shift, in this case to facilitate a sustainable or public transport mode for accessing the Cork Metropolitan Area. Monard, a designated strategic development zone and supported in CMATS for suburban rail connectivity and enhanced bus connectivity, also sits on this line. It is essential that investments are made proactively to catalyse the potential of these locations for investment, employment and housing. Blackpool, a thriving economic hub on the northside of the city, while on the rail line is currently not serviced directly by a suburban rail station. This would further grow the commuter passenger numbers, greatly increasing the accessibility and permeability of the northside, supporting the growing employment zone in Blackpool, and development of the Kilbarry Business and Technology Park. The development of the station at Kilbarry to service Blackpool and the northside of the city would be a transformational strategic infrastructure addition. The enhanced utilisation of existing infrastructure must be a key consideration. This again aligns with the priorities and infrastructural elements of CMATS.

Although not in the gift of the M20 project team, we must note that to maximise the value of the railway network already servicing Cork City, the Cork to Mallow route should be reclassified as a commuter rail service. This would be pivotal in increasing the number of those commuting by train, improving the affordability and practicality of the service to those travelling daily. Mallow is located as close to Cork as Naas is to Dublin, which is included in the Short Hop Commuter Zone resulting in great fare reductions for passengers travelling in the Greater Dublin Area. Currently to travel from Mallow to Cork is €9.39 one way online, equating to nearly €20 as a daily return fare for commuters, whereas the fare between Sallins to Dublin Heuston is €4.90 each way, though less with the LEAP card. Right now, as Mallow isn't included as a commuter station, there's no opportunity to avail of any LEAP card reductions for passengers. The opportunities far outweigh the negatives. With the reclassification to a commuter train station with strong frequency of service and a lower rail fare, there is scope for significantly growing passenger numbers. There would be enormous economic, quality of life and environmental benefits in changing commuter travel modes, offering commuters viable alternatives to private car transport.



## 6. Active Transport

Opportunities to integrate with the wider active travel networks, outlined in the Limerick Shannon Metropolitan Area Transport Strategy (LSMATS), and the Cork Metropolitan Area Transport Strategy (CMATS), should be seized. This is a considerable opportunity to progress active travel infrastructure, local level accessibility, and permeability to support active and safe sustainable transport for our regional towns. Such infrastructure will not only support the re-emergence of local economies through the popularity of cycle and greenways for tourism. It will also be instrumental in reinvigorating regional towns that are currently choked by traffic. This will have considerable benefit to communities across the region. It will support school children in accessing their schools safely as well as local commuting. It will support improvements in air quality, health and well-being and will be instrumental to reversing our cultural overdependence on car commuting. The opportunity herein to integrate a cohesive greenway system along this route, that safely connects into local towns along this route, and provides inter-urban connectivity for active travel cannot be underestimated. Greenways are proving a considerable benefit to the economies of local towns across the country e.g., in Mayo with re-emergence of economic activity in towns such as Newport. There is considerable latent opportunity in developing a comprehensive greenway network. It is fiscally sensible to implement active travel infrastructure as part of a comprehensive transport corridor upgrade.

## 7. Conclusion

For the reasons outlined throughout this submission we encourage the project team to take every available opportunity to complement and/or implement interregional active travel, and CMATS/LSMATS objectives in the final design stages and to ensure that the design is leading, contemporary, safe and progressive in relation to multi modal mobility combining road, bus, rail, and active travel.

As ever, we encourage the project team to engage proactively with the community and stakeholders throughout the development process.

Ultimately, a comprehensive investment in the functioning of the N/M20 corridor is required for road, rail and active travel. There may be potential to make significant and impactful improvements on all fronts and this should be actively encouraged. As ever, Cork Chamber remains deeply committed to the comprehensive improvement of transport and mobility between Cork and Limerick along the M/N20 corridor.