



Transport & Mobility Forum

LUAS Cork

TII Transport Infrastructure Ireland
Little Island
Cork

Via online consultation portal

Transport and Mobility Forum, Cork
www.transportandmobilityforum.com
tmfcork@gmail.com

c/o The Environmental Forum
Bernadette Connolly
Mount Carmel, Kilcolman
Enniskeane, Co. Cork
P47 C578

9th June 2025

Public Consultation – Response

LUAS Cork – Emerging Preferred Route (EPR)

www.luascork.ie

Dear Sir/Madam,

Thank you for giving the general public and stakeholders the opportunity to feed into the public consultation on the Cork Northern Distributer Multi-modal Road (CNDMR) Emerging Preferred Route.

The Transport and Mobility Forum, Cork (TMF) is a cross-sectoral representative group of organisations who have a common interest in sustainable travel *. The TMF fully supports measures and policies promoting sustainable and active travel. Sustainable and Active Travel (cycling and walking) helps to reduce congestion on roads, improve air quality, supports a low carbon economy, reduces noise pollution and improves public health, as well as the general quality of life in the city.

As such it is the TMF's aim to support the UN's Sustainable Development Goals, in particular SDG 3 (Good Health and Well-Being), SDG 11 (Sustainable Cities and Communities) and SDG 13 (Climate Action).

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Overview

Transport and Mobility Forum, Cork (TMF) is strongly in favour of the proposed plans for a LUAS light rail in Cork. Public Transport (PT), along with active travel, needs to become the backbone of transport in the Metropolitan area. Present levels of private car traffic in the city (in absolute numbers) cannot be exceeded going forward, as already now, one local incident in the peak hours brings large parts of the city road network to a collapse. In the contrary, they need to be reduced given the space needed to prioritise PT and Active Travel infrastructure.

PT's attractiveness and reliability vs. delays in traffic congestion due to high volumes of car traffic is a typical "chicken or egg" situation, which must actively be addressed and communicated by the City Council and the NTA. This transition process needs clear communication and leadership. Even after the completion of a light rail system, the public transport within the city will continue to largely depend on buses in the 2030s. Both buses and light rail services will need to be frequent and reliable, with predictable travel times. Trust in PT's reliability will be essential to attract more passengers and hence free up road space where these passengers have previously been travelling by car.

The proposed high-volume East-West (light-rail) corridor is fully supported and needs to be strengthened in PT offer long before the actual light rail will become operational.

In addition, a similarly strong North-South bus corridor (in connection with P+R) shall be created to take through car traffic out of the city centre, not least to create room for dedicated bus and cycling infrastructure crossing the city centre.

P+R sites in the West and North of the City must connect directly to employment hotspots like the South-West (UCC, CUH, County Hall) and Mahon via the proposed light rail system as a priority.

Connections and transfers between routes, operators and transport modes will more and more become the norm. They need to be organised as seamless as possible, as the "one-seat bus trip" becomes more unlikely.

Seamless transfer between routes and modes will become even more important when the planned Light Rail route becomes operational, as trips on the main corridor will be bundled, but fine distribution in the suburbs will often need to happen by bus.

Stops and stations should be well connected to local walking and cycling routes. Bicycle parking should be provided at major stops. Bike+Ride and Park+Ride should be provided in key locations.

Stops should become a "place" in neighbourhoods and serve multiple purposes (vending machines, "parcel motel", local notice board, ...). Access and waiting must be safe esp. for vulnerable users, incl. single female passengers. Stops should be visible in populated and overlooked places ("with eyes on the street"), well-lit at night. Light rail stops 'Neighbourhood Mobility Hubs' should be explored.

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Light rail stops must be built in parallel with new local developments, not years later, so that demands for services will exist from “day one”.

The carriage of bicycles on all services should be facilitated at least in off-peak hours. Integrating both modes will unlock significant synergies regarding light rail catchment and last-mile solution as well as action radius for cycling.

This proposal will be a Gamechanger in public transport and we hope that the first Cork LUAS line will be extended to develop a network.

Observations:

Main points in bullets:

- Inconsistent distance between stops
- Large trip attractors and high density population nodes along the line not well served by stop location
- Hence buses in parallel cannot fully be replaced
- Large proportion of shared lane, esp with bus lanes
- Bus stops often placed on the tracks, no lay-by bays
- City Centre routing advantages & disadvantages of Washington St., Patrick St, McCurtain St versus South Mall or North Quays (vulnerability, resilience)
- Cycling to be facilitated along the route (also as destination bike traffic)
- Need to facilitate compact transit orientated development
- Low level of Service in Ballincollig
- Location of western Park & Ride
- Sequencing of the taking into Public Ownership of the Green field sections of the route
- Provision for extension and additional lines

Distances between LUAS Stops

We note that in some parts of the LUAS line, the stops are quite far apart from one another. This applies in particular for the western part of the line (west of Patrick St).

We acknowledge that a balance must be struck between a higher travel speed and the best catchment of trip attractors along the line. Another challenge will be the insertion of LUAS stops in a confined street environment.

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However, we feel that – following the more detailed lay-out plans – the goal of shorter travel times gets counteracted by the fact that the LUAS track will often run in shared use of bus lanes, and in the majority of cases, the bus stops here will see buses stopping in the bus lane / on the tracks, i.e. not in a bus bay. This raises the risk that the trams will get stuck behind buses calling at bus stops, as the trams cannot overtake buses here. This becomes increasingly problematic where bus stops are highly frequented (e.g. in Washington St). This will inevitably slow down the LUAS, leading to longer travel times.

Further, a higher number of stops, bringing the LUAS closer to people in its catchment corridor, can also increase its attractiveness. If travel times are seen over the entire length of the journey, i.e. door-to-door, shorter access walks to the LUAS stops will compensate for slightly slower travel speeds while on the tram itself.

Missing LUAS Stops along the proposed line

As said above we feel that often large trip attractors are passed by LUAS line without a stop. One example here is the UCC Main Campus area along Western Rd. Neither the Main College Gates (at Donovan's Rd), nor the Victoria Cross area (UCC Western Gateway Bldg, Mardyke Arena, numerous student accommodation complexes, County Hall etc.) are served by a LUAS stop in close enough distance.

Other places might be the start of Curraheen Rd (Bishopstown Bar area), or the Cork Science Park, where the proposed location of the stop is too far west and north to adequately serve the future CSAIP.

It is vital that each stop serve the maximum possible population or the greatest concentration of services and amenities this requires that the stops are regularly spaced out of an appropriate spacing but also that a network of walking and cycling routes ensure that everyone within a kilometer of that stop has the shortest possible walking route to that stop. This will require action by public and private bodies outside the scope of this consultation but action needs to be enabled and will only be possible if the placing of stops to allow this to be achieved. In areas where this infrastructure will need to be retrofitted and in areas which already have a dense and permeable pedestrian network such as the city center and some suburban nodes the stations must be situation on a spot in the existing street grid which allows the maximum access. And every opportunity must be taken to situate stations the centre of larger Green or Brown field sites of a scale which can enable the development of high density development in an area of 400-800m radius of the stop with a street network orientated around the proposed stop.

On Street running.

Running a light rail line on a road which is accessible to other traffic renders the line subject to disruption or interference from that traffic lowering the reliability, speed, and frequency of services.

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Providing a dedicated of road route is more costly and requires a larger take of land. A successful overall scheme involves balancing these factors, usually accepting the delays and disruption which inevitably come with on stream running in centre city and at the periphery close to termini but providing off-street running in the longer sections in between. We appreciate the difficulties and trade-off which are needed to achieve this but we have some concern at the overall predominance of on street running over off-street dedicated lines.

The details of how this work will come further on in the process but it must be appreciated at the route selection stage that running the light rail on street for long distances in the suburbs will require that private motor traffic on these roads must be severely limited 24 hours a day and probably totally excluded at peak times.

LUAS line itself

City Centre

The Luas line is supposed to traverse the city centre via Washington St, Grand Parade, **Patrick St**, MacCurtain St. These are the Four main retail and hospitality streets in the city they constitute are the prime public realm in the city and they also carry the majority of the city bus services. Having these busy streets directly served by Louis is an advantage but it also comes with several significant disadvantages:

- Having the LUAS run in parallel to all bus routes in the New City Bus Network in a single corridor (through Patrick St) makes the entire PT network in the city centre extremely vulnerable to any incident occurring in Patrick St (accident, water mains burst, road works, demonstrations, ...).
- While the only remaining two motor traffic lanes in Patrick St will be for bus and the LUAS only (in shared lanes), deliveries and taxis must also be catered for. Even with a sufficient amount of loading bays, disruptions from manoeuvring trucks and vans will be inevitable at times. While a bus can go around such temporary obstacles, trams will get halted.
- In the presence of light-rail tracks, the bus lanes in Patrick St cannot safely be used by cyclists (of all levels of abilities). The addition of separate cycle paths in Patrick St would be the consequence, as Patrick St needs to be accessible by cycle traffic. The same would apply to MacCurtain St.

An **alternative routing through Grand Parade – South Mall** and Parnell Place or Clontarf St should instead be considered. Advantages would be:

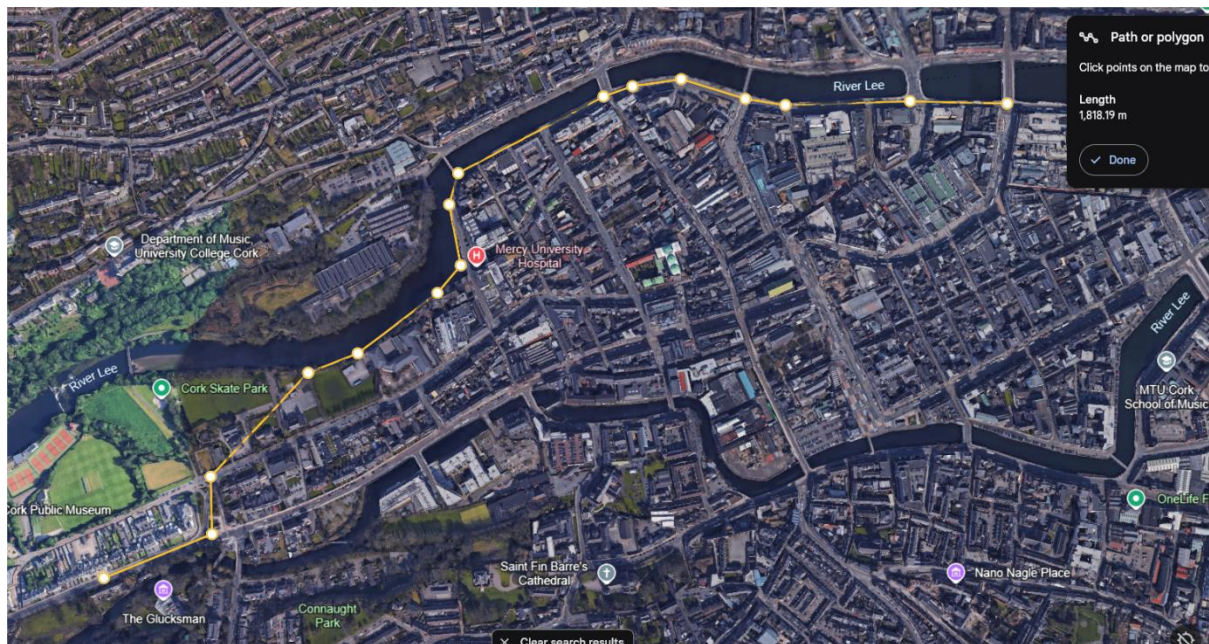
- A PT network that is more resilient to disruptions, as South Mall would be a back-up route, possibly also served by 1 or 2 regular bus routes to have a permanent bus infrastructure (incl. stops) in place here.

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- The southern part of the city centre would be served better, as would the adjoining South Parish (which will be under-served by the New City Bus Network).
- Large trip attractors would be in closer reach, like City Hall, schools of Music and Commerce, UCC's future CUBS site, etc.
- The Cork Bus Station would be in closer distance to a LUAS stop, which is paramount to an integrated PT network in the city
- At the northern tip of Grand Parade, room would be available for a centrally located bus stop in the absence of the space consuming tight S-shape curves of track from Washington St into Patrick St. This would resolve a problem with locating the central and busy bus stop around Grand Parade / Washington St – see below in more detail.

An **alternative routing Via the North Quays**. Advantages would be:

Fig 1 Possible Noth Quays Route

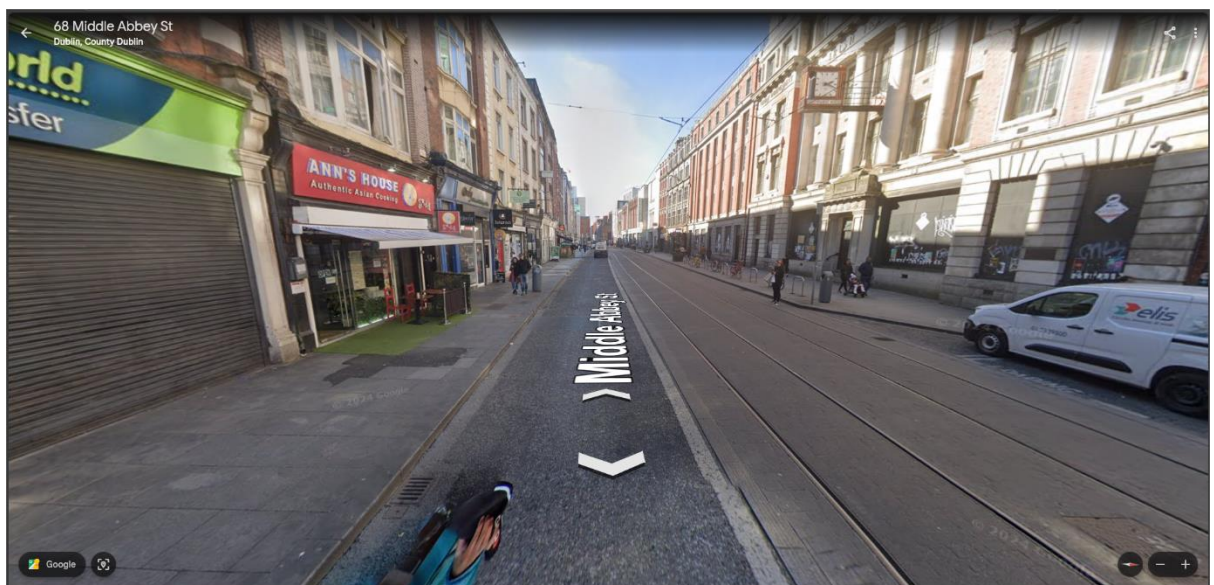


- A PT network that is more resilient to disruptions, as bus and Light rail would not share the same routing.
- Less on street running subject to delay from road traffic.
- The regeneration of the North Quays which is at present dominated by road traffic.
- Better service of underserved high density and demand areas on the inner Northside such as Shandon St area.
- The Cork Bus Station would be in closer distance to a LUAS stop, which is paramount to an integrated PT network in the city

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- Washington and McCurtain Streets could be avoided. Both streets are approximately 18 m wide, this is very marginally narrower than Abbey Street in Dublin which presently carries a LUAS line. Using Abbey Street as a guide, this would require 7 m for the Light Rail line, a 3.25/3.5m wide traffic lane to allow deliveries and access, 3.5 m wide loading Bay, leaving only a narrow 2m wide footpath on either side. Unlike Abbey Street both Washington Street and McCurtain Street also carry bus routes, Using Abbey streets in Dublin as a guide it is very difficult to see how any bus lane or bus stop could be incorporated while allowing the unimpeded passage of a light rail line. See further discussion below. It may be possible to reroute busses away from McCurtain Street it is extremely hard to see how this could be done for Washington Street. While Abbey St is also a prime retail street, Washington and McCurtain Streets are also the prime hospitality and public realm space within the city in a way Abbey St is not in Dublin and as such the loss of public realm space on these streets would represent a significant blow to the city.

Fig 2 View of Middle Abbey St. Dublin



Public Transport Stops at Washington St / Patrick St / Grand parade:

The future bus stop in Washington St (westbound, east of South Main St), as proposed in BusConnects STC F seems highly problematic. We highlighted this in our submissions to the BusConnects STCs.

This bus stop will be highly frequented, with up to 30 buses calling in the peak hour (will be less when LUAS will be operational). Street space here is very constraint, and we have doubts if the limited spaces will cater for the number of pedestrians and bus passengers at this high-profile bus stop and give it a quality that this stop needs.

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Further, it is quite off-set from the junction with Grand Parade. Grand Parade is one of the hot-spots in the city centre where people intuitively expect to find and access public transport, but yet, there are no bus / LUAS stops planned on Grand Parade.

In the LUAS EPR plans, the light-rail tracks are planned to be in the bus lane, while the westbound bus stop will not have a layby bay, i.e. buses will call and stop there every 2-3 minutes (on average, clustering is likely). The trams will inevitably get stuck behind buses calling at this bus stop.

If the LUAS line goes via Grand Parade / South Mall, there could be a LUAS stop on Grand Parade (south), while buses can stop at Grand Parade (north), with room enough for a high quality bus stop in a better place than Washington St. Passengers can intuitively find both buses and the LUAS in one of the most prominent and populated locations in the city centre.

The importance of optimising the potential of the land bank between MTU and Clash Rd.

Apart from the city centre the majority of Cork has been developed as an extremely low density suburban area this makes it difficult to provide transport services or for local services and amenities within walking distance of most residents to survive. This has resulted in a high degree of car dependency. The provision of a light rail line allows the construction of higher density housing and the building of communities with services and amenities within walking distance. While every effort can and should be made to achieve this within the existing built-up areas around proposed stations there are natural and obvious limitations to this. Where the proposed line crosses large green or brown field areas the high capacity and frequency offered by light rail can allow the development of higher density urban rather than suburban style development this offers a significant opportunity to meet demand for this type of house and reduce car dependency in the region. This will also be required to achieve the level of passenger demand required to support a light rail line.

This is the rationale behind routing Light Rail through the proposed docklands development area. The approximately 2.25 km distance between MTU and the Clash Road offers an even greater opportunity for transit-oriented development and should include at least 3 proposed stations around which high density development can take place oriented around the stops. If the line is to deviate to the south serve the science park or in order to enter Ballincollig further West, see below, this would offer an opportunity for an even greater number of proposed station sites around which transit orientation high density development could take place. The opportunities for more compact and sustainable development which this offers should be seriously considered.

The advantage of this landbank over other landbanks further out which could be served by future extensions or other light rail lines is that the location and elevation of the land is such that the accessibility offered by the light rail line could be very significantly add enhanced by the synergies offered by a Greenway network linking these Stations and their associated high density nodes to MTU, UCC, CUH, and the City centre, creating an integrated non car dependant large scale quarter surrounded with established suburban areas which could progressively infill under it's influence,

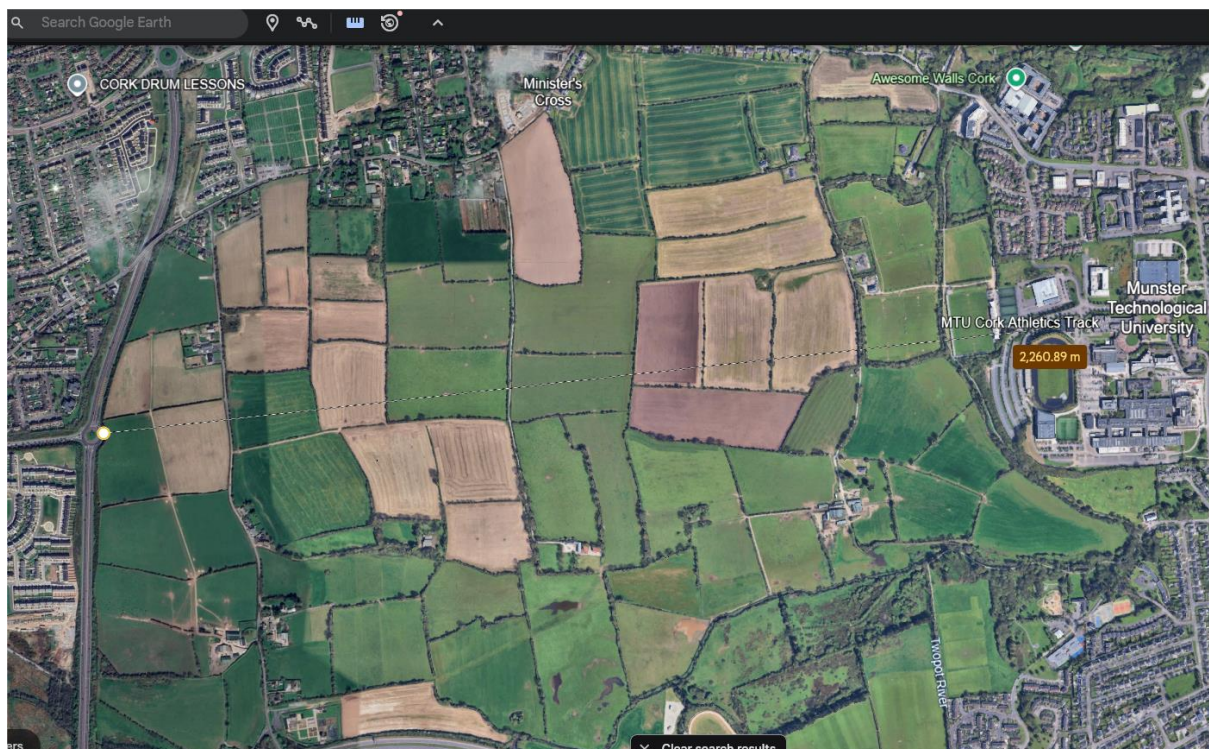
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rather than an isolated transit oriented development distant from other high density areas or trip attractors and dependent purely on commuting via Public Transportation.

In order to facilitate this the proposed route should be taken into public ownership at the earliest opportunity In the greenway and subsequent busway (limited access street) built-in order to allow the beginning of development around proposed stations in advance of the building of the light rail to avoid the situation where development cannot begin to take place until after the light rail project has been complete.

It is of vital importance that land in close proximity to stations should be used for the highest football activities. Due to the unique potential of this area we think that it is inappropriate for the park and ride or depot to be located in this area and it should more properly be located on the Western edge of Ballincollig at a more appropriate terminus, see below.

Fig 3 Land Bank between MTU and Clash Rd.



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Ballincollig single track ring & Location of western Park & Ride

The proposed single track ring serving Ballincollig village center serves only 9% of the developed area of Ballincollig. We are seriously concerned that having such a small proportion of the population of Ballincollig within walking distance of a station will result in continued car dependency in the majority of the town and hence conjection affecting the service in Ballincollig Ballincolligillage and Cork City Center. While we appreciate the low density nature of Ballincollig makes it difficult if not impossible to serve the majority of population by having them within walking distance of a station. We fear the small area that is served, it's existing low density, and the lack of space for infill in this served area means that the number of riders to and from Ballincollig will be extremely low.

Fig 4 Area Served by 4 proposed Ballincollig Stations versus existing built up area of Ballincollig



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We feel for this reason, and also to provide a park and ride at the Western outskirts of the city which does not consume land which could support compact development closer to the city center and large trip attracters, the route should continue further West in Ballincollig ideally terminating with a park and ride on depot in the vicinity of EMC.

There are a number of ways which this could be done,

a double track could proceed South of the developed areas of Ballincollig further west than currently proposed before forming a single-track loop

or a single-track extension could proceed further west with the planned loop proceeding as planned.

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Fig 5 existing proposal



Fig 6 minimally extended ring



Fig 7 Fully extended ring



Intermediate Termini

To facilitate relief services at central sections of the line.

Sidings also at Kent Station, Wilton CUH, Clash Rd P+R. So far only planned at Pairc Ui Chaoimh.

LUAS Extensions- towards a network

We assume and hope that the proposed LUAS line will only be the first stage to eventually develop a light-rail network. Extensions to the North and South would be the next steps to follow, but also extensions at either end of the east-west line shall be considered.

South: A future link to Cork Airport / Airport business park would be desirable. We understand that this is earmarked to branch off at Wilton CUH.

North: Blackpool shopping centre and business park would be a destination for a norther extension

West: While the present line is planned to end in the centre of Ballincollig, a western extension towards Classis Lake and the DELL campus should be considered.

EAST: While the LUAS is supposed to end at Mahon Point shopping centre, the large scale housing at Jacobs Island, just beyond the N40 South Ring will not be served. A later extension here would unlock significant potential for public transport. Meanwhile, better access by active travel should be facilitated by a separate active travel bridge across the N40.

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Preparations

In the present plans for the first LUAS line, future extensions should be earmarked and prepared. The design of the first line should not inhibit later extensions as described above (here esp. the design of the eastern terminus in Mahon).

Facilitating Cycle traffic

The future presence of light-rail tracks in the streets will create a challenge for bicycle traffic. While today, bus lanes are often part of the city's cycling infrastructure (e.g. Washington St), this will not be the case if these bus lanes will have light rail tracks. Safe cycling infrastructure for all ages and abilities cannot include bus lanes (or other traffic lanes) that carry tram tracks.

Where there is no room for segregated cycle lanes in the streets, through cycle traffic can be re-routed in parallel. However, destination traffic for cycling to such streets will become a challenge (parts of Washington St, Patrick St, MacCurtain St).

We trust that solutions will be found to adequately maintain accessibility of such streets by cycle traffic.

Conclusion

We strongly support the proposed light rail system and hope our suggestion can facilitate it's optimal delivery.

We would be obliged to further participate in the discourse and planning processes around this and other Active and Sustainable Travel improvement schemes as we feel that TMF can provide valuable input into the process. Please do not hesitate to contact us at any time at tmfcork@gmail.com.

Kind regards

Stephan Koch

Transport and Mobility Forum – Acting Chair

Darren McAdam-O'Connell

Transport and Mobility Forum – Coordinator



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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/>