

Cork County Council
Senior Engineer
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County Hall
Cork

Via consultation portal

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c/o Cork Environmental Forum
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Public Consultation – Response

Draft Cork County Council Climate Action Plan 2024 to 2029

Dear Sir/Madam,

Thank you for giving the general public and stakeholders the opportunity to feed into the Draft Cork County Council Climate Action Plan 2024 to 2029. 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) help to reduce congestion on roads, improve air quality, support a low carbon economy, reduce noise pollution and improve public health.

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).

Overview

We broadly support the majority of measures proposed in the plan, we do feel however there are a number of emissions which need to be addressed in the final plan.

In particular we feel that the plan does not address sufficiently the role of spatial development in driving demand for transport by increasing the distances between people's homes, places of employment and education, retail, social, leisure, and other journey generators. This is the number one priority for the reduction of transport emissions, and it is the only aspect of transport policy which falls squarely under the remit of the local authority rather than central government the NTA or other bodies.

General

The plan lacks any reference to or action on the intimate link between spatial development and transport demand.

This is particularly relevant for this plan as spatial development is primarily the concern of the local authority which has direct influence over policies in this area unlike policies concerning avoid, encourage, and improve. And also because encouraging a modal shift to more sustainable modes of transport requires as a prerequisite the reduction of median journey length as the present patterns of travel within the county are easily achieved bike car but extremely challenging to achieve using active travel or public transport.

Strong support and welcome for Objective 4.4.1.8 and the objectives which follow.

We particularly welcome Objective 4.4.1.8 and the objectives which follow (page 53). We note however that the promotion of active travel is dependent on changing the pattern of spatial development to allow more compact urban growth and a rural environment free from long distance commuting which produces speeds and volumes of traffic which make the roads unsafe for pedestrians and cyclists.

Why spatial development is key to reducing transport emissions.

The plan lacks any reference to or action on the intimate link between spatial development and transport demand. Evidence shows that the spatial layout of a person's environment strongly determines their transport choices the distance required to reach everyday destinations is key in determining transport choices. If the majority of your everyday journeys to work to education for retail and social activities require distances of greater than three or four kilometers there is next to no chance that active travel will be used if this is combined with low population density making it difficult to provide a coherent and frequent public transport service reaching all of these destinations car dependency is almost inevitable. It's not purely distance that is For example most national schools are within walking distance of the children they serve but when the volume and speed of traffic makes the roads unsafe parents will not let their children walk. But it must be accepted that spatial development and long journey distances are the main driver of the speed and volume of traffic in this case.

This has been a consistent priority of the transport and mobility forum in its efforts to reduce transport emissions as well as to improve the health of our population see below for our list of priorities from 2021.

Cork Transport and Mobility Forum Priorities to reduce Transport emissions

Priority	Why	How
1 Reduce the distance needed to reach everyday destinations.	Shorter journeys equal less emissions. More trips become possible by active travel. Shorter trips allow lower speeds.	Compact mixed-use communities, waste less space on wide roads, junctions, medians, verges, and parking. Introduce density minimums.
2 Switch to lower energy/emission modes.	Active travel is naturally zero emissions as well as having health, social and cost benefits, public transport is naturally lower emission than using individual private vehicles.	Reduce travel distances. Subsidise and encourage low emission modes tax, limit, and discourage high emission modes. Tax emissions, limit the entry of high emission vehicles to low emission zones, use road pricing to discourage private vehicles. Limit parking through planning restrictions, parking levies, banning free parking and the construction or sale of parking as part of residential, office or retail units. Increase public transport subvention and provision. Safe, direct, and attractive cycle & walking routes.
3 Reduce size & weight of vehicles	Lighter vehicles require less energy to move and so less emissions. Lighter vehicles are also safer for those around them and so reduce the “arms race effect” of ever-growing vehicle size and lower number of pedestrians & cyclists.	Change vehicle standards at EU level to favour lighter vehicles. Tax heavier vehicles more highly, reduce the maximum weight limit for vehicle classes, lower speed limits for heavier vehicles, limit access for larger vehicles to urban areas. Lower speeds
4 Lower the speeds	Lower speeds require less energy to move and so less emissions. Lighter vehicles are also safer and so reduce the “arms race effect” of ever-growing vehicle size and lower number of pedestrians & cyclists. Average driving speeds are circa 25kph yet cars are optimised for speeds of circa 100kph, this requires far heavier engines and all vehicles be armoured to survive collisions with vehicles at those speeds vastly increasing the weight, cost and emissions of each vehicle.	Reduce speed limits, greater speed enforcement, automatic speed logging. Change vehicle standards at EU level to ensure vehicles are optimised for speeds of no greater than 30kph and collisions at those speeds. Reduce travel distances.
5 More efficient/lower emission power/fuel	More efficient vehicles and low emission fuels such as electric emit less emissions per distance at a given weigh and speed	Advance the ban on the sale of new Petrol/diesel vehicles. Increase the duty on Petrol & diesel. Fund the building of a public charging network through levies on the motor industry.

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Most important actions for reducing transport emissions.

We feel the points listed below are the most important actions for reducing transport emissions and should be included in the climate action plan.

- Compact settlement to reduce journey distances is the highest priority in reducing transport emissions.
- Compact settlement requires permeability to be effective.
- Most people living in cork county feel like they need a car, nothing should be built that requires a car to get to. All group housing should allow people to live without a car meaning employment, schools, shopping, post office, take away, hairdressers etc. need to be within walking distance. Clear demarcation is needed between single one off rural housing to meet the needs of people living and working (not commuting!!!) in rural areas and urban living only which is only urban when sufficient services are present to allow car free life, a housing estate at the edge of a village without services or employment does not allow urban living or meet rural needs.
- Parking should be limited in all cases and where it is allowed parking must be paid for individually not included with individual units to be paid for collectively. No free parking.
- Proper walking and cycling facilities should be available for all. Everybody without exception should feel safe, from 8 to 80, to step outside their door or gate and walk or cycle without worry of road violence. This requires as a minimum a 30 kilometer an hour speed limits all urban and rural residential roads.
- Public transport must be accessible to all, it must be frequent and to allow people to live their lives without a car meaning not just commuter journeys but social, leisure, and family responsibility trips need to be possible by public transport as well.

Suggested amendment to the table on page 65 at the beginning of section 4.7 transport.

The table on page 65 at the beginning of section 4.7 TRANSPORTATION lacks any references to reduction, reducing the distances required to reach everyday destinations.

Existing text

Avoid: Policies addressing ways to avoid and reduce trips. Examples include: remote working / e-hubs, etc Shift:

Encouraging a modal shift to more sustainable modes of transport. Examples include: Public Transport, Active travel, etc.

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Improve: Using new technologies and fuel types to power vehicles more sustainably. Examples include: Electric vehicles, biofuels, etc.

Suggested amended text

Avoid: Policies addressing ways to avoid and reduce trips. Examples include: remote working / e-hubs, etc Shift:

Reduce: Reducing the distances required to reach everyday destinations. Examples include: compact development, increased density, mixed development, infill development, permeability improvements, etc.

Encouraging a modal shift to more sustainable modes of transport. Examples include: Public Transport, Active travel, etc.

Improve: Using new technologies and fuel types to power vehicles more sustainably. Examples include: Electric vehicles, biofuels, etc..

Conclusion:

The TMF feels that the the draft climate action plan is in general a well thought out coherent plan which would benefit immensely from the inclusion of a reference to the role of spatial development in reducing transport emissions as well as the other points we have outlined above.

We would be obliged to further participate in the discourse and planning processes around the reduction of transport emissions 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

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/>