

Cork City Council

Climate action team,
Strategic & Economic Development
City 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 City 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 that first there are a number of emissions which need to be addressed in the final plan and second, we feel the plan would benefit greatly from the addition of quantitative numeric targets in place of qualitative aspirations and a commitment to simple measure.

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 the following proposed actions and Expected outcomes.

We particularly welcome the following actions

- Continue to support bus and rail investment in the roll-out of Bus Connects, investment in suburban rail and plans for light rail.
- Continue to extend active-travel routes and infrastructure, including dedicated / separated cycle routes in all parts of the city.
- Support the implementation of an active-travel policy for all Cork City schools.
- Increase secure bike parking across the city
- Implement the city's Wayfinding Scheme.

We particularly welcome the following expected outcomes.

- Car journeys of less than 2km are reduced significantly.
- Significant increase in residents availing of public transport and active travel.
- Air quality improves in all areas of the city, with subsequent health benefits for all.

While we strongly welcome these outcomes we feel we would prefer to see these outcomes reworded to both;

Ensure that the goal of reducing Car journeys of less than 2km is extended to 5km, with journeys of less than 2km effectively eliminated with a tiered reduction in Car journeys of 2 to 5km.

And from “Significant increase in residents availing of public transport and active travel.” to “Significant increase in residents, , incoming commuters and visitors availing of public transport and active travel.”

And we note however that the promotion of active travel, efficient delivery of public transport and achievement of the above outcomes is dependent on changing the pattern of spatial development to allow more compact urban development to ensure everyone is within walking distance services, amenities, bus stops etc. rather than requiring a car to reach same.

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.

Lack of quantitative targets

We are disappointed that no quantitative targets for the identified KPI are given, with sanctions if same are not met. We worry that the lack of quantitative targets puts at risk the overall ambition which is evident throughout the plan. We have to be realistic and accept that not all targets will be met but if no targets are set none of them will be achieved.

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.
- Many people feel like they need a car, often this is because one or more necessary every day journey is impossible or impractical by active travel or public transport. The majority of these people when they feel they need a car will inevitably use the car for the vast majority of journeys. This will continue to be true until nothing is 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.
- 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. There is no such thing as free parking only parking which is paid for collectively rather than by those who choose to use it and no parking for at the point of use or included automatically with development should be allowed.
- 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 amendments

Scope of the Plan

Add Land use planning under Full Accountability to Fig 3: Pg27

Compact settlement

Reducing the distances required to reach everyday destinations is the key to reducing transport emissions and this needs to be reflected in the Actions, Outcomes and KPI's. Examples of required measures include: compact development, increased density, mixed development, infill development, permeability improvements, etc. We therefore suggest the following additions.

Actions:

- Policies are put in place to ensure all new development can be easily, conveniently and universally accessed walking, cycling and public transport and that an insignificant number of residents/worker/customers etc. will require a car to access.

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- Policies are put in place to ensure all new residential development is at sufficient density and permeability that the population within walking distance is sufficient to easily support local services and that provision is made accommodate such local services.
- Policies are put in place to encourage and incentivize infill development in existing developed areas to increase residential density and the availability of local services, employment and recreation.
- Policies are put in place to ensure existing communities with poor pedestrian and cyclist permeability receive links to ensure improved pedestrian and cyclist permeability.

Expected Outcomes:

- Significant increase in residents living within walking or cycling distance of local services.
- Significant increase in residents living within walking or cycling distance of their place of employment or study.
- Significant increase in residents living within walking or cycling distance of friends and family.
- Significant increase in residents living with walking distance of a bus stop.
- Significant increase in residents living on a Public transport route connecting to their place of employment or study.
- Significant increase in places of employment served by public transport and/or walk and cycling routes.
- Significant decrease in residents who require or feel they require a car to reach local services.
- Significant decrease in residents who require or feel they require a car to reach their place of employment or study.
- Significant decrease in residents who require or feel they require a car to visit friends and family.
- Elimination of places of employment or study only practically accessible by car.

KPIs:

- 10% decrease in the number of people driving to work or study.
- 10% increase in the number of people living within 400m walking distance of a food shop.
- 10% increase in the number of people living within 400m walking distance of a bus stop/train station.
- 10% increase in the number of people living within 400m walking distance of a hairdresser.
- 10% increase in the number of people living within 400m walking distance of a pharmacy
- 10% increase in the number of people living within 400m walking distance of a park.
- 10% increase in the number of people living within 400m walking distance of a restaurant, takeaway or café.
- 10% decrease in the number of people driving to do their regular food shop.
- 10% increase in the number of people living within 2km cycling distance of a food shop.
- 10% increase in the number of people living within 2km cycling distance of a bus stop/train station.
- 10% increase in the number of people living within 2km cycling distance of a hairdresser.

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- 10% increase in the number of people living within 2km cycling distance of a pharmacy
- 10% increase in the number of people living within 2km cycling distance of a park.
- 10% increase in the number of people living within 2km cycling distance of a restaurant, takeaway or café.

Traffic reduction

In an ideal world it would be enough to simply incentivize active travel and public transport. But unfortunately the historic prioritization of motor traffic and the realities of behavior change require that we also take concrete measures to discourage the use of private motor vehicles, as well as incentivizing active travel and public transport. We must continue to make active travel and public transport easier safer and more convenient but it's naive to think that change will occur at a sufficient pace to meet our commitments and improve the health of the population without removing some of the measures that were put in place to make driving so attractive in the first place this.

Actions:

- Policies are put in place to reduce the number of car parking spaces in the city.
- Policies are put in place to phase out free parking.
- Policies are put in place to new development does not include parking.
- Policies are put in place to reduce the access of motor vehicles to the city center, residential areas and other areas of high footfall.
- A low emission zone is put in place in the city.
- A reduction in rates for premises without car parking is put in place.
- Road pricing is put in place in the city.

Expected Outcomes:

- Significant decrease in car parking spaces within the city.
- Significant decrease in the number of car journeys through the city.
- Significant decrease in the number of cars in the city.

KPIs:

- 10% reduction in car parking spaces per annum.
- 10% reduction in motor vehicle km driven per year.
- 20% reduction in number of private motor vehicles crossing the city center per annum.
- 10% reduction in number of households with a car.
- 5% increase in number of households with registered for car sharing per annum.
- 15% reduction in the level of air pollution in the city center.
- 10% increase in the length of pedestrian streets per annum.
- 10% increase in the length of quiet streets per annum.

Adaptation

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Sust Urban Drainage systems SuDS are an important mitigation measure.

Bad weather, in particular rain is a significant barrier to the adoption of active travel. The increase in precipitation due to climate change will exacerbate this situation. However, in cities which have a high modal share of cycling the presence of rain does not appear to be a significant distinctive to the use of active travel, in large part because the infrastructure is designed for both the climate and active travel.

An example of this is storm water drainage. Light Irish rain will not rapidly wet somebody walking or cycling but being splashed by a car moving through standing water will. It is often this standing water which is the greater barrier to the adoption of active travel then the rain itself. For this reason we see improved storm drainage as an important climate adaption as well as having a part to play in the encouragement of active travel. This needs to include unsealing of surfaces, semi permeable car parking surfaces, working road storm water drainage, and trees.

Actions:

- Storm water drainage will be improved to ensure those walking, cycling or wait on streets are not at risk of splashing.

Expected Outcomes:

- Significant decrease in standing water on streets

KPIs:

- Sust Urban Drainage systems be installed on 5% of roads/streets per annum

KPI's

We are concerned that the various KPI's included in the draft do not contain any figures, numbers or quantities. We would suggest that concrete figures be included within the draft.

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.



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Kind regards

Stephan Koch

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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/>