

## Transport & Mobility Forum



### **Cork City Council**

Traffic Operations Division,  
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City Hall,  
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*Via consultation portal*

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### **Public Consultation – Response**

## **Cork City Road Traffic (Special Speed Limits) Bye-Laws 2024**

<https://consult.corkcity.ie/en/consultation/cork-city-road-traffic-special-speed-limits-bye-laws-2024>

Dear Sir/Madam,

- Thank you for giving the general public and stakeholders the opportunity to feed into the Draft Cork City Speed Limit Bye-Laws 2024. 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.

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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 proposed special speed limits, in particular the widespread designation of residential streets as 30 km/h zones.

### General considerations

We are strongly supportive of 30km/h speed limits in all urban, residential, retail, commercial minor, and side street) roads. International research has clearly shown that speeds above 30km/h greatly increase the risk of death and serious injury in the event of collisions, would intimidate cyclists and pedestrians from using the streets, and would produce a far less pleasant, attractive, and universally accessible environment for all road users.

Improved conditions for **active travel must be at the heart of planning** for a sustainable city and communities, and must get an equal, if not higher importance to car access for the planning of new developments, residential, retail, educational (schools) and commercial (workplaces).

A special focus should be on **planning for the youngest and the oldest**, i.e. with children and the elderly in mind, in order to promote and maintain their independence.

**Slower speeds of motor traffic** and a consistent 30 km/h speed limit on city streets is required to allow all of the above and should be the goal. Over time, 30km/h should become the default speed for city streets. Streets exempt from 30km/h should only be those arterial route which can meet clearly defined criteria (main thoroughfares, sufficiently wide footpaths (depending on – potential – footfall), sufficient space for safe cycling, ...). This would honour Ireland's signing of the UN's "Stockholm Declaration" in February 2020. In this context, TMF supports Ireland's the widest possible application of 30km/h speed limits.

Lower speeds for motor traffic in large parts of the City will be an important **factor to raise levels of active travel**, perception of safety and attractiveness of the public realm. This will subsequently also raise the attractiveness of neighbourhood centre businesses.

Therefore, 30 km/h should be seen as the default speed limit, with any exceptions to this having to be justified on a case-by-case basis. Rather than the present situation where the reduction of speed limit to 30 km/h requires a case-by-case justification which places a considerable workload on City Council officials and engineers. We are mindful of the existing legislative framework which at present results in considerable time and expense for every individual street or road which is to be designated as 30km/h.

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We note positively that this proposed Bye-Law covers a large contiguous areas but we are still disappointed that it generally does not extend beyond purely residential streets. We would strongly suggest that rather than the process of speed limit reduction proceeding street by street it should be instead applied over wider areas.

This approach would also reduce the need for signage (which is, as we understand, also a limiting factor today). Rather than being placed at all junctions to an individual street, signage would only need to be erected at the (often limited number) of access points to a specific area. This would significantly reduce the time and expense required to ultimately ensure that the vast majority of streets and roads in the city have the speed limit reduced to a more appropriate level.

There are also significant advantages in motorists, cyclists and pedestrians knowing that 30km/h is the speed limit over a wide area rather than the confusion which may arise when speed limits change from street to street. Ultimately, there should be a clear and consistent policy that Cork city is a 30km/h zone except on main arterial routes that do not see significant pedestrian or cycle (without dedicated infrastructure) usage and only when clearly signposted with a higher limit.

In this sense we acknowledge the current constraints for designating more streets, not only residential, for 30 km/h, but are hopeful that, following the Department of Transport's recent speed limit policy report (Sept 2023), a wider spread number of streets can be included into the next round of bye-laws in the near future, such as

- Arterial street with high footfall and narrow footpaths
- Streets adjacent to schools
- Streets in local neighbourhood shopping areas etc

### Relevance to Sustainable Development Goals

On a global scale, lower speed limits in the city would be in line with the UN's Sustainable Development Goals, in particular with

- SDG 3 (Good Health and Well-Being),
- SDG 11 (Sustainable Cities and Communities) and
- SDG 13 (Climate Action).

A swift transition to lower speeds on Cork's streets would also support the City's commitment as being part of the 100 Mission Cities to achieve net carbon neutrality by 2030.

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### Conclusion:

We see the continuous transition to lower speeds as an essential element in the transition to a sustainable transport system, that is further promoting Active Travel (a high priority also in the new City Development Plan). Although lots of streets have already become 30km/h zones in the past years, it is important that this process takes up momentum and proceeds faster than before, also including wider categories of streets than in the past (i.e. going beyond purely residential streets).

With regard to Cork being part of the 100 **Mission Cities** to achieve Carbon Neutrality by 2030, we ask the City Council to take extra efforts to push the transformation of Cork's transport system to a healthier mix of increased levels of Active Travel, higher share of Public Transport, and adequate accessibility of remaining necessary private motor traffic.

We therefore we strongly support all of the the extensive list of streets with reduced speed limits to be included in this proposal.

Should you require any clarifications, please email us at [tmfcork@gmail.com](mailto:tmfcork@gmail.com) .

Kind regards

*Stephan Koch*

Transport and Mobility Forum – Acting Chair

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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/>*