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Public Consultation – Response

Moving Together:

A Strategic Approach to the Improved Efficiency of the Transport System in Ireland

<https://www.gov.ie/en/consultation/b51b0-moving-together-a-strategic-approach-to-the-improved-efficiency-of-the-transport-system-in-ireland/#submissions>

For links to the individual consultation documents, see Appendix 2

Introduction

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).

We would like to take the opportunity to comment on the proposed 'Moving Together' Strategy while offering the following comments for further improvements.

Overview and general response

Our view on the overall vision and objectives of the draft Strategy.

We are extremely impressed and support in the strongest terms the overall vision and objectives of the strategy.

We are particularly impressed that this strategy does not merely look at increasing the capacity, speed or efficiency of transport provision or how to increase the speed or distance we can travel, like many other transport related policies and projects.

It holistically looks at transport as a service which is required to be economically productive, socially active and achieve personal satisfaction as well as being required to meet personal, caring, social and professional responsibilities. Realising that the more of these journeys we can make with the least time and effort spent, and the least distances to be travelled, the easier it is to live our lives to the fullest and this is best done by shortening the distances required to make these journeys.

In particular we strongly support consideration of the role of spatial planning in reducing the demand for travel (esp. regarding distances) and facilitating more sustainable travel. Spatial planning will play a pivotal role in tackling 'transport inflation' on the demand side rather than the supply side.

We especially support the – maybe unique – approach of having a look at the **roots and the causes for the excessive amounts of daily travel**, and the ever-increasing distances to be covered, trying to address those, instead of accepting them as a given and provide for solutions to accommodate these amounts of traffic and travel. The **value of the multi-sectoral approach** this strategy provides must not be underestimated and finds our strongest support.

While we are impressed and supportive of the cross sectoral strategy and vision of the plan, we will outline below how we are worried that merely acknowledging this issue rather than providing clear measurable and compulsory targets to ensure more compact sustainable growth and the transition to more financially, socially, and environmentally sustainable modes of transport will not occur.

Our transport priorities.

The TMF strongly supports measures which reduce the health, social, economic and environmental cost of transport. The rapid transition to more efficient transportation is of vital importance to the nation and requires us to rapidly

- 1 Reduce the distances needed to reach everyday destinations.
- 2 Switch to lower energy/emission modes such as walking, cycling or public transport.
- 3 Reduce size and weight of vehicles
- 4 Lower mean and peak free speeds of motor traffic
- 5 Transition to more efficient/lower emission power/fuels

See Appendix 1 for more details on our views regarding emissions reduction.

We believe that achieving these priorities requires implementing a number of policies in combination, and that the strategy document should contain firm commitments to such policies including a requirement to achieve specific measurable outcomes (monitoring). It is important that these policies have a cumulative, synergistic, and multiplicative effect. While these policies are generally useful and warranted in isolation, they will be vastly more effective in combination with the weakest link in the interaction between proximity (density/permeability), comfort/safety (appropriate infrastructure), and incentives having the most influence.

These policies should at minimum meaningfully address each of the following issues.

- A clear commitment to ensuring large parts of our streets and roads, other than motorways or mayor arterial roads where alternatives are available, will be safe, comfortable, and attractive as well as accessible for everyone of all ages and abilities. Streets where everyone will feel safe not only to walk out their front door or gate, but to walk or cycle without fear of traffic, any special equipment or precautions but also to be able to send their children out unsupervised without worry.
- A combined standard for density and permeability which specifies minimum targets for the number of people to be within walking distance of developments.
- Minimum limits to urban densities, in both units per hectare and in FAR (floor area ratio).
- Maximum limits to block sizes to insure permeability
- An obligation on local authorities to work to “retrofit permeability” in existing communities by opening up cul-de-sacs, removing hostile roadways dividing communities, creating strategic active travel links etc.
- A national standard for minimum number of stories to be achieved in suburban, urban and town centre developments.
- Planning regulations to ensure active street frontage rather than either blank walls or a frontage set back behind extended car parks.
- Encourage the use of low emission modes by fiscal and other measures
- Tax, limit, and discourage high emission modes.
- Limit the entry of high emission vehicles into low emission zones, which should ultimately cover all urban and residential areas.
- Transition from fuel tax (as revenues will decline) to road pricing to replace this revenue, and to allow discriminating between those for whom driving is unavoidable and those driving in areas that are walkable and well served by public transport.
- Limit parking through planning restrictions, parking levies, banning free parking and the construction or sale of parking as joint parts of residential, office or retail units.
- Increase public transport provision and ensure low, attractive and simple fares
- The provision of safe, direct, and attractive cycle and walking routes.
- Maximum limits to car parking and taxation of same
- An obligation on local authorities to infill low density suburbs and wide road corridors.
- A nationwide 30km/h default speed limit in built up areas, with higher speeds only allowed where no commercial or residential frontage is present.
- A commitment to work on changing EU vehicle standards in order to reduce the size, weight and design speed of private motor vehicles.
- A review of government policy to identify unintended policy consequences which inadvertently encourage car dependency.
- A move to flat rate mileage allowance where a single rate is applied for the use of private vehicles rather than higher rates for less sustainable vehicles.
- A move away from commercial rates which discourage commercial development in town centres and incentivise “out of town” type developments and toward a system of land tax which

incentivises compact development. While discouraging low density and “out of town” type development as well as vacant or underdeveloped land in urban areas in particular town centres.

Is the level of ambition sufficient to deliver the level of change required?

The level of ambition in this strategy is above and beyond anything we have seen so far. However, it still falls short of comprehending and acknowledging the radical transformation that is needed in transport not only to reduce our emissions (and meet the 2030 emission targets), but also to remain competitive economically, to provide a quality of life that is more satisfying and desirable for our population, and a healthier lifestyle.

Commented [1]: we have seen?

While we welcome in strongest possible manner the acknowledgment of the need to achieve compact walkable communities, where journeys will be shorter and possible on foot, we feel that there is no clear commitment to achieving this. This will require a radical change of our system of spatial planning from a paradigm to prevent over-development to one primarily concerned with achieving compact density and preventing under-development.

Preventing over-development has incentivized car centric sprawl. The planning system must be radically transformed to be primarily concerned with preventing under-development, low density, and the lack of permeability which pushes up the distance between people, the places they need to travel to as well as simply the distances between the people we want and need to meet to maintain personally, caring, social and professional relationships

We need to continue to reshape our spatial planning system to produce walkable compact neighbourhoods where all of a person's everyday journeys, not just the journey to work, school or college, can easily be attributed to being achieved on foot, by bike, or by a short and convenient trip on high frequency public transport.

We also feel that there is not enough ambition shown in the anticipated rapid transition from a system of transport based primarily around the private automobile to one where active travel, public transport and forms of shared mobility dominate and the use of (single occupancy) private motor vehicles is a rare exception.

While the paradigm of a just transition (justifiably) is repeatedly mentioned, we are – however - concerned about reading statements like e.g. “... strategy [must] undergo a comprehensive impact assessment from a just transition perspective, to ensure that they do not disproportionately impact the regional economic performance or any of the captive-car users’ cohorts.” (Captive Car Use document, pg. 33) which sounds like an excuse for not consequently implementing change to the system.

Is there sufficient balance in terms of the onus/responsibilities being placed on the various actors and implementing bodies mentioned?

We feel given the strong emphasis and acknowledgment in this strategy of the key importance of spatial planning there needs to be more of an onus and responsibility on the planning authorities at the level of the

- National Planning Framework
- Regional Spatial and Economic plans
- City/County Development Plans

aimed to ensure that all new developments are more easily accessible by active travel or by public transport than by private motor vehicle. It is important that strict limits are put in place to ensure all

development is proximate to a town centre or public transport hub with sufficient density and permeability to allow all everyday journeys to be easily carried out within that community on foot or by bike or with frequent, accessible public transport with and between these communities.

Our thoughts on the level of ambition as per the recommendations in Chapter 10

While we welcome most if not all of the recommendations in chapter 10, we feel that this is the weakest section of the strategy because the recommendations do not sufficiently follow through on the fundamental vision of the overall strategy. Particularly in regard to spatial planning we feel that these recommendations need to be substantially strengthened and we will address this in detail below.

The recommendations as they stand represent a very significant step forward and we would have no hesitation in endorsing and supporting them as they stand, however, we do feel that they can be substantially strengthened and improved and in particular the scope of the recommendations can be widened.

Does the Strategy sufficiently highlight the potential risks, challenges and opportunities associated with the achievement of its objectives?

We would like this strategy to focus more clearly on the tremendous opportunity that more compact human rather than car centric communities present.

Where people can find all of their daily journeys taking place on foot or by bike within those communities, and thus vastly improving the quality of life of the population.

Where less time is spent traveling, but more journeys can be made.

Where families can spend more time together, people have more free time to spend with friends and neighbours and extended family.

People are less stressed, their health is less affected by inactivity, air pollution, and social isolation, and the financial burden of the daily commute is removed.

A society where people leave home at 7 or 8 in the morning and do not return until 6, 7, or 8pm without spending time within their communities in between is a society which will lack social cohesion and a society which offers a very poor quality of life to its members, and which will struggle to attract high skilled workers and entrepreneurs or remain economically competitive.

The opportunity to transform this country into a society where people can easily move between work, family, and social commitments as well as the everyday commitments and chores of life, can positively transform the lives of the population, as well as creating a more cohesive society. A society where people once again meet their friends and neighbours on the streets where they live. A society where unplanned socialization is the norm, rather than only everyone meets those people you have planned to meet for pre-arranged meetings, widening personal, professional, and social horizons. Allowing people to lead healthier more productive lives.

Detailed Comments

What more can be done to achieve the spatial planning objectives, further recommendations and feedback on compact communities.

Low density or impermeable settlement patterns where all everyday journeys require long distances to be travelled and relatively few people are within walking distance of their home, work, or recreational activities inevitably lead to car dependency, as it is the only practical way to travel the long distances which are required to live your everyday life.

In order to transition to a more sustainable efficient transport system the first and most important priority is that we decrease these journey distances by ensuring more people are within walking distance of everyone's home, place of work or education, and recreational activities, resulting in communities that are more compact and permeable. This will also greatly reduce the adverse social, health and well-being impacts of driving and increase the benefits of active travel.

Achieving this will not be possible without a large number of changes to the way we currently plan and develop our communities, as well as significant retrofitting of our existing communities. The success or failure of this endeavour will require that most - if not all these steps - are achieved and will in fact be most critically dependent on which ever steps are last or most poorly implemented ones.

We therefore suggest that planning guidelines as suggestions below become national policy or are incorporated at city/county development plan level.

In short, the focus of the Irish planning system needs to be transformed from one of preventing over-development to one of ensuring development takes place at as high a density as is possible while still ensuring sufficient living, recreational, natural, and open space along with light and air.

We need to support land use planning/planners in delivering increased densities of developments through increased building heights as well as intensification and diversification of underutilised land. The aim must be to ensure that there is a sufficient population within a development to support all the service within walking distance and enough people in close proximity to ensure a vibrant community.

1.

It is vital that all future development, with only very limited exceptions, should be more easily accessible by foot and bike or by public transport than by private car.

This requires not only that spatial development ensures compactness, density and permeability in new and existing communities, but also that space is not prioritised for the use of the private car. Space used for parking, wide streets or distributor roads all result in people, services, amenities, schools, jobs and destinations being further apart and making active travel impractical, public transport less efficient and the private car more attractive.

2.

A combined standard for density and permeability is needed which specifies minimum targets for the number of people to be within walking distance of developments.

Where all every day journeys can be undertaken by foot, bike or public transport, people will usually choose those modes, however if any regular weekly journey needs, or is perceived to need a car, most people into a position of forced car ownership and it is likely that car dependency will result from the required vehicle being used for the majority of journeys.

This means that in order to avoid car dependency, as many as possible everyday services need to be within reach by walking, cycling or public transport and this in turn requires that the population density within short distance or on the public transport route is sufficient to easily support those services. In turn requiring a sufficiently high gross density as well as a sufficiently permeable street layout to allow those destinations in theoretical walking or cycling distance to actually be reachable within those distances via accessible and attractive walking and cycling routes. It is therefore far more important to concentrate on the gross density within our communities rather than the net density within a development.

We recognize that it's impractical and undesirable to penalize, or to be perceived as penalizing, developments within communities which are at an existing low density by requiring far more ambitious and potentially costly design to maximize density within those developments, but guidelines must reflect that it is the gross community density that determines whether a development is sustainable and walkable or car dependent and unsustainable.

3.

Guidelines must put more emphasis on the permeability of developments and more particularly on how developments improve the permeability of communities. Density, permeability and compactness are all equally important in ensuring the creation or maintaining of sustainable communities.

For this reason, the guidelines must include guidance on setting targets for either or both the number/availability of facilities such as schools, shops, employment and other destinations or the gross population within active travel distance or easily accessible by public transport.

4.

Conversion between dwellings per hectare and population within walking distance.

The presence or absence of services and amenities within walking distance is dependent on there being a population capable of supporting these. Increasing the Dwellings/ha (DPH) not only allows more people to live closer to existing services and amenities, but it also allows the presence of those services and amenities within communities which at a lower density would not be capable of supporting them. This multiplication effect of density means that there is a critical density at which certain services can appear within communities, but in practice there is a single critical density where a critical mass of services can be supported within a community to allow people to form the habit of walking to most services locally rather than the habit of getting into the car every time they leave the house, resulting in no services being present within the community nearby.

This absolute minimum of sustainable urban density is in the region of 10,000 people/km² given reasonably good permeability and good compactness within the community and assuming mixed use zoning allows the presence of such services and amenities within the community.

In order to convert the population required to support a given service or amenity into a minimum DPH which can support those services or amenities within a community it must be assumed that a maximum of 50% of the growth area within a community or within walking distance is residential allowing space for major roads and parks, schools, commercial uses and the presence of flood zones and other environmentally sensitive areas etc. and thus even with excellent permeability only 50% of the area theoretically within walking distance (as measured by a circle on a map) can actually be reached within that distance on foot given the road network layout.

5.

Existing Irish planning guidelines dramatically underestimate the densities achievable with traditional Irish terraced housing. For example, the Industry Street area (off Barrack St) in Cork City has 74 substantial three-bedroom terraced houses on 0.6 hectare, giving a DPH of approximately 125. While these late 19th early 20th century terraced houses do not meet modern building standards, building to three rather than two stories on the same footprint can easily achieve modern standards for space and separation if no front gardens or parking are included. As an extreme example, Corporation Buildings in Cork City achieve a DPH of 240 with own door terraced accommodation.

6.

Consideration of local character and amenity should - in the context of urban centres - include a minimum number of stories. The traditional vernacular building patterns for cities such as Cork, Dublin or Limerick was for four to six story buildings lining city streets, with lower three-storey buildings on back lanes. One or two-storey buildings, other than monumental buildings such as churches, theatres etc. were present only as insubstantial slum or shanty type dwellings.

There should be a presumption that urban building should be a minimum of three storey within urban settlements and the minimum of five storeys within an urban streetscape.

7.

The provision of car parking spaces should not be allowed as integral part of residential developments except for disability access, deliveries. It should be sold separately only where demand ensures but the market price of the car parking space exceeds the gross costs including land and missed opportunity costs of building such parking.

It should not be possible to build any housing where the cost of providing parking is included in the cost of building, buying or renting the property, or where any part of the cost is passed on to residents who don't decide to separately purchase parking. Parking should only be available separately otherwise those who do not wish to drive are forced to subsidize the provision of parking for those who do. Where parking is allowed, planning conditions should strictly ensure that the full cost of provision is recouped by the sale of parking spaces not by any additional cost to the sale or rental of residential units.

8.

We support the reduction of and the introduction of greater flexibility in minimum separation distances in these guidelines. Excessive separation distances result in lower density, force people further apart and create car dependency. The emphasis should be on proper architectural measures to prevent poor privacy or shading rather than relying on excessive separation distances. In general, the guidelines should support street widths of a similar scale to the adjoining building heights with the inclusion of narrower mixed use lanes for short distances between buildings.

Where an obligation on the project proposer to demonstrate that separation distances are sufficient not to negatively impact on the privacy or amenity of occupiers exists, a similar obligation should exist to demonstrate that separation distances could not be further reduced without such negative impact in order to prevent the negative impacts of lower density and car dependency on the occupiers.

9.

Targets should be set to ensure local authorities to work to "retrofit permeability" in existing communities by opening up cul-de-sacs, removing hostile roadways dividing communities, creating strategic active travel links etc. This must also apply to delivering sufficient infill development to ensure both that these existing communities achieve a sustainable density and that they become mixed use with housing and services available in all communities. Local authorities should also have an obligation to infill wide suburban and urban road corridors with an active street frontage which can act as a neighbourhood focus. Such wide suburban and urban road corridors serve to isolate the communities on either side and reduce density.

10.

Active street frontage (the 'Urban Plinth') strongly encourages people to spend time on a street while long stretches of blank walls or other "dead" frontage contributes to a feeling of unease and the perception of danger which strongly discourages active travel and community vibrancy. Planning regulations need to ensure an active street frontage rather than either blank walls or a frontage set back behind excessive parking or front gardens.

What more can be done, further recommendations and feedback on Generators of Demand and demand management.

If we are to successfully transition from a car dominated transport system to one where active travel, public transport and forms of shared mobility is instead the default means of transport for the majority of the population, we cannot continue to build destinations which assume the use of a private car to reach. If accessing job opportunities, services, or retail it's easier, even occasionally, for those who drive it will perpetuate the norm where people feel they must be a driver to fully access society and the transition will not occur.

Therefore a prerequisite beginning this transition is ensuring that all new developments are more easily accessible on foot, by bike or by public transport than by private motor vehicle. A central tenant of the planning system must be that no house, workplace, or service should be built if the people who will live, work or visit the building will not be able to safely, comfortably, and conveniently arrive and depart by active travel or public transport and that driving must not be more convenient way to arrive at these destinations than walking cycling or public transport.

The provision of workplace parking is a highly significant generator of demand of the use of private motor vehicles. Policy should ensure that free workplace parking is not allowed except for disabled drivers or where the motor vehicle is an integral part of the job (e.g. for delivery drivers).

Where workplace parking is provided legislation must ensure that the employees are given a choice as to whether or not to take a space and pay a cost which reflects the full economic cost of providing the parking, including the land and construction costs.

In general legislation should prevent the provision of free parking for employees or customers except for informal parking in remote rural areas. When a business provides free parking for customers this cost is bourn equally by all customers resulting in those using more sustainable forms of transport, indirectly subsidizing drivers. This form of subsidy should be outlawed with legislation requiring that all car parking provided by businesses be charged for at full economic cost.

There should also be strict limits in the amount of new parking allowed to be constructed in urban areas. To allow those in remote rural areas still dependent on private motor vehicles to access services and employment in urban areas, parking will still be required, but this parking should be removed to park and ride facilities as close to the origin of the journey as possible and as far from the centre of communities as possible.

School siting and design.

As for many people the school run is an essential part of their daily routine, it is also a determining factor for many parents' overall travel behaviour.

It should be imperative that schools are safely accessible by means of active travel. Hence all new **schools must be located in the hearts of neighbourhoods and communities**. The Department of Education has a key role here in providing land for new school in such suitable locations, as this will determine sustainable or non-sustainable school run patterns for decades to come.

As many of their pupils and students as possible should be able to access their schools by walking or cycling in a safe environment, and, dependent on age, should be enabled to do so independently. The Dept. of Education's design standards for new schools should be revised to ensure that new schools are designed with the intention that norm should be that students and staff arrive via active travel or public transport. For schools with a large geographical catchment with higher use of private motor vehicles, drop-offs in the immediate vicinity of the school should be strongly discouraged.

All existing schools should execute an **active travel audit** and be retrofit with safe active travel access where necessary (Safe Routes to School for ALL schools).

School streets where car traffic is largely restricted at start and finish times should provide a "soft landing" for children and address the increasing issues of congestion (and hazards) and air pollution outside schools.

For young people travelling longer distances to schools, the schools should be **connected to public bus services (or even a school bus** service, possible with a hybrid operation model involving parents). When the motorised school run is unavoidable, defined drop-off zones a reasonable distance away from the main school entrance should funnel and regulate car access and protect other children walking and cycling.

As for many parents, the **school run is connected to their commute**, long distance and car dependent access also determines the modal choice for their commute. The closer the school is to where children live and the more they are able to get to school independently, the higher are the chances for their parents to be in a position to commute other than by car. Therefore, schools should favour students living closer to the school.

Similar policies and considerations should also inform the location and design of other state service facilities such as health centres etc.

What more can be done, further recommendations and feedback on Fiscal Measures.

Active Travel

To facilitate the continued transition towards active travel we would suggest:

1. That the funding to support a modal shift to active travel is continued and that funding is made on a multi-annual basis to better enable local authorities and other service providers to more efficiently plan and utilise their resources to allow for better outcomes.
2. Rebalance funding from capital funding of infrastructure to behaviour change and maintenance to ease delivery bottlenecks in the delivery of capital projects.

There needs to be a significant rebalancing of funding away from engineering and infrastructure to measures to support, facilitate, and enable behavioural change such as foreseen in the Department of Transport's proposal for Pathfinder Sustainable Travel Projects. With funding directed to supporting communities of place and interests in transitioning to active travel, those people new to active travel,

walkability audits, permeability audits, events, and programmes to make walking and cycling more aspirational, desirable, and fashionable.

4. That multi-annual funding be provided for an interagency transport forum, such as TMF, in each county/region to coordinate the accelerated transition to sustainable transportation locally within civil society.

5. Continuation or increase for the Bike to Work scheme, with higher ceiling for cargo bikes and other bikes capable of carrying multiple people as well as trikes, recumbents, hand cycles and other adapted and accessible bikes.

6. That a flat public sector mileage rates be introduced (see below) which does not discriminate against active travel and forms of micromobility.

7. Funding for public and private bike and micro mobility share as well as multimodal mobility hubs be increased.

Public Transport

To facilitate the continued transition towards public transport we would suggest:

1. That the present programme of **investment in public transport continues**.

We would like to highlight, in particular, a number of projects which we feel are vital to ensuring the effective provision of public transport in the Cork region.

1a. The rapid delivery of Bus Connects

1b. The enabling works to allow the recently purchased Irish Rail battery electric rolling stock to serve the Cork commuter routes of Mallow, Midleton & Cobh

1c. Funding for light rail in Cork including a connection with Kent Station

2. That funds be provided in order to further **lower (and simpler) public transport fares**, including the use of promotional fares which have been so successful in Germany and Spain and the trialling of free public transport services both on particular routes and for particular demographics such as young people.

3. That funding be provided to extend services to **underserved communities** to ensure no one is subject to forced car use and ownership. The whole range of **alternative forms of service** (DRT, shared mobility, community buses etc) should be investigated here.

4. That funding is provided to allow public transport service providers to better **attract bus drivers** to alleviate the effect on services of the driver shortage.

5. Capital funding be provided for new **multi-modal public transport hubs** and the expansion of existing hubs to better facilitate the easier connection between modes as well as between public and private services.

Motor Fleet Transition.

To facilitate the optimal transition of the national motor vehicle fleet we would suggest the following fiscal instruments be applied:

1. Refocus subsidies and tax breaks on the least energy intensive options, large and less efficient vehicles should receive lower subsidies than smaller lower power vehicles. The lowest power vehicles should receive the greatest subsidies e.g. e-bikes and the lightest/lowest power cars, vans and trucks, while oversized/high powered electric personal (as distinct to freight, PSV, etc.) vehicles should not receive subsidies, while e-cargo bikes, and e-cars should be seen as a continuum rather than completely separate categories. At present high-powered e-cars receive a far higher subsidy than e-bikes. This should be reversed while continuing to ensure that e-cars remain more attractive than ICE (Internal combustion engine powered) vehicles such as petrol and diesel powered cars.
2. Motor tax bands should be calibrated to ensure there are several bands covering e-cars from the smallest and lowest power to the oversized and overpowered to incentivise smaller lower powered EVs
3. As the national fleet transitions to EVs, the fuel tax revenue will decline, and road pricing should be used to replace this revenue. This would have the advantage of allowing those who require motor vehicles in isolated areas not to have to bear as heavy a tax burden by discriminating between those whose driving is unavoidable and those driving in areas that are walkable and well served by public transport. While also discouraging driving specifically where roads are most congested as well as where they cause the most health, social, and productivity losses.
4. That a flat public sector mileage rate be introduced in order to not incentivize less sustainable modes and/or larger vehicles. This should not only include a single rate for licenced motor vehicles but rather a single rate for all forms of personable mobility, including walking, cycling, micromobility, private motor vehicles. At present many non-governmental organisations feel constrained by the public sector mileage rates and are held back from moving to a more sustainable system of mileage allowance.
5. That free parking be discontinued or at minimum free employee parking taxed as a benefit in kind. The provision of free parking not only strongly incentivises the use of private cars, it also places the cost on those who don't drive and surrounds trip generators with a mote of parking making active travel and public transport less viable.
6. Local authorities be free to tax parking spaces to reflect the costs incurred by providing for the passage of motor vehicles through communities.

Distance Reduction

The best way to reduce the health, social, environmental, and financial cost of transport is to reduce the average distance people need to travel to access work, education services and social opportunities they need to visit every day. This is committed to in the National Planning Framework and the National Spatial Strategy, however certain financial and regulatory issues act in opposition to this goal.

To facilitate reducing the average journey distances, we would suggest:

1. That there be an audit of all regulations, taxes, and subsidies to ensure no unintended consequences which act to increase average journey distances.

2. That the Central Bank lending rules include the amortization cost of transport in calculating the real net cost of a mortgage to ensure people are not incentivized or forced to commit to a lifetime of long-distance commuting rather than spending slightly more on a home closer to where they live their lives and work with very significantly lower transports costs.

3. That the commercial rates system be reformed in order not to perpetuate the market distortions which incentivise out-of-town development with lower rateable values than city centre properties and hence discourage commercial development in town centres and incentivise “out of town” type developments.

The government should either;

Rebalanced the rates system to reward the location of high-volume trip generators and large employment hubs close to the centre of settlements and disincentivize the location of same in an isolated out-of-town locations which are only accessible by car leading to first car ownership.

Or move away from commercial rates and toward a system of land tax which incentivises compact development. While discouraging low density and “out of town” type development as well as vacant or underdeveloped land in urban areas in particular town centres.

4. That local authorities be free to charge rates at a higher rate on parking spaces and that residential properties used for car parking be excluded from the residential rates exemption to reflect the costs incurred by providing for the passage of motor vehicles through communities.

What more can be done, further recommendations and feedback on accessibility and safety.

Over the past 50 years roads and streets have come to be seen less and less as public social spaces where neighbours can meet talk or kids play and have become exclusively the domain of motor vehicles. Spaces where people feel unsafe and unwelcome to walk or socialize. Meeting your neighbours on the street has come to be a thing of the past.

We need to have a clear commitment to reversing this were all roads and streets other than motorways and main arterial routes are seen primarily as public space accessible to everyone, where everyone should feel comfortable, welcome, and safe. The priority should be the most vulnerable and the most social activities not prioritizing the speed and throughput of motor vehicles. This needs to be the primary design focus on all urban roads on all residential roads and anything that can be called a street.

Nobody should feel unsafe to walk out their own door or gate. It is common in rural Ireland today for people not to feel safe to walk on the road directly outside their own gate. When rural residential roads are unsafe to walk people are unable to even reach public transport which may come within a 100 m of their home and are isolated in their home unable to connect with their community, services or opportunities.

When parents do not feel safe leaving their children unattended for even a moment by the roadside they will bring them everywhere by car. In suburban Ireland it is common for housing estates to open onto distributor roads designed purely for moving private motor vehicles as quickly and efficiently as possible rather than being a place where pedestrians or cyclists feel safe or welcome, and where the convenience of anyone other than those in a car is not considered.

We need to design our roads with the pedestrian as the primary user, other active travel users as the next most important design consideration, and accessibility for motor vehicles being achieved without sacrificing the safety accessibility or comfort of other road users (see hierarchy of modes in DMURS).

We are strongly supportive of 30km/h speed limits in all urban, residential, retail streets. International research has clearly shown that speeds above 30km/h greatly increase the risk of death and serious injury

in the event of collisions, intimidate cyclists and pedestrians from using the streets, and produced a far less pleasant, attractive, and universally accessible environment for all road users.

Speeds above 30kph cause direct death and injury, but the real damage of higher road speeds lies in the discomfort, intimidation and unwillingness of pedestrians and cyclist to share the road or street with high-speed traffic. We will never achieve significant modal shift from the private car to active travel until the majority of roads and street have traffic traveling below 30km/h. This is also true for public transport as people need to be able to safely walk or cycle to the bus stop or station to begin or end a journey on public transport. In particular parents will be unwell to allow their children mix with high speed traffic and will feel compelled to continue driving their children around until the majority of streets have low typical speeds.

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 30km/h requires a case-by-case justification which places a considerable workload on local authority 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. We would strongly suggest that the processes for speed limit reductions are streamlined, to minimise this cost and workload while maximising the rapid adoption of widespread 30km/h inner urban speed limits.

Rather than the process of speed limit reduction proceeding street by street it should be instead applied over wider areas. Average speed surveys, public consultations etc. should be carried out over as wide and coherent an area as possible as a single exercise, reducing the time and expense involved.

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.

Ultimately, there should be a clear and consistent policy that 30km/h is the default speed limit 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 order to achieve our climate applications and to improve public health, it is vital that private vehicles transition away from large heavy internal combustion vehicles to smaller lighter electric vehicles. Transitioning to electric vehicles dramatically reduces, but does not eliminate, emissions from motor vehicles, dramatically improving the health of the Nation.

Smaller lighter vehicles use less energy, are less resource-intensive to manufacture, take up less road space and less parking space hence reducing the amount of embedded carbon required for transport infrastructure, and most importantly are less threatening and intimidating to other road users having less of a discouraging effect on active travel.

Increased vehicle widths require increased road widths, narrowing the space available for pedestrians and cyclists, decreasing neighbourhood densities and therefore a walkability of our communities, they require greater space for parking. Taller vehicles are far more dangerous and intimidating on the road and impair visibility. Heavier vehicles require more energy and are more dangerous as well as disproportionately increasing the wear and tear on roads

The government should commit to working at EU level to reduce the maximum allowable weight and dimension of private road vehicles and the maximum weight on dimensions of light goods vehicles for a given internal volume or carrying capacity.

Air pollution presents a real danger to the health of the general population and in particular to certain individuals who are at higher risk. We recognise that it is unacceptable to ask at-risk individuals or the general population to limit their exercise outdoors. We recognise that there needs to be consideration given to closing roads to motorised traffic when pollution levels rise and the level of outside exercise should be restricted. Ideally, this would be a tapered response where first the public is asked to avoid unnecessary journeys, then traffic is limited to essential journeys, then private vehicles are banned before it is limited to only emergency vehicles. We also recognise that this is extremely difficult in practice and a more realistic option is to close a road when it's dangerous and open it to all traffic when it is not.

As such we strongly support the introduction of low emission zones which should be introduced gradually and on a phased basis. Beginning with excluding the most polluting vehicles from city centres but ultimately expanding in time to covering all urban and residential areas and excluding all but zero emissions vehicles. We are very aware that this needs to be a gradual process which will allow time for adoption. Beginning with the most polluting vehicles being excluded from smaller areas should expand overtime with more strict ambition standards then being adopted in the original inner city low emission zones.

This process should be flagged as soon as possible so people will be aware that highly polluting vehicles will not be able to travel through city centres in the foreseeable future.

The provision of safe, direct, and attractive cycle and walking routes, needs to be a priority. While our primary concern should be ensuring that all of our roads and streets are accessible to all and that those walking and cycling be considered the primary users of the majority of our streets, there is also a clear need for the separate provision of dedicated walking and cycling routes for arterial transport and leisure.

And the provision of dedicated separate walking and cycling routes such as greenways, Quietways through residential areas and dedicated long distance arterial routes, has 3 clear advantages.

- They can be more appropriate for walking and cycling as many existing arterial routes in our suburban areas which were primarily developed for the motor vehicle and are not particularly suitable for walking and cycling even if all motor traffic was removed.
- They can be cheaper to construct than retrofitting existing arterial routes
- They can allow the motor traffic to remain unobstructed on existing arterial routes during our transition.

A significant gap in the strategy is the underlying assumption that people will primarily or exclusively **access public transport** which is immediate to their home or destination. The reality is that it is unlikely to be possible in every case. We must make provision **closing that last mile gap** to allow people to access public transport which does not directly serve their home or destination. This was captured in the 'Captive Car users focus group' document.

This last mile gap must be closed by a number of complimentary methods

- By increasing densities and improving permeability so it is easier for public transport to reach as many homes and destinations as possible.
- By increasing the distances people feel comfortable walking and cycling using the same strategies as we use generally to encourage and enable walking and cycling generally.
- By providing dedicated last mile services such as 'shared on demand services', particularly for populations who may have difficulty with mobility and accessibility. Public Transport in Irish

planning is often still limited to classical bus service, while now there is a wide range of options between classic bus and private car which should be considered and evaluated.

- By the increased use of micro mobility including the likes of bike share schemes and electric scooters.
- By the use of park and ride, where the objective should be to get car users onto Public Transport as early in their trip as possible.

International travel

International travel is not generally a primary focus of our (the TMF's) activities. However, on reading the breakdown of transport emissions included in the consultation documents we were struck by the significance of aviation emissions in our national carbon footprint. Even if these figures are not generally included in national emissions but rather included in global international aviation emissions, we still have a responsibility to address this issue.

In general, we feel that there needs to be a significant rebalancing of the incentives, subsidies, and taxes which strongly incentivised air travel over international rail travel and particularly in the case of Ireland ferry travel. While acknowledging that – Ireland being an island – air travel has a higher significance here than elsewhere, combinations of shorter air travel and connecting (high speed) train travel should be encouraged and better facilitated. Practical measure here, however, might be difficult to find as the relating interchanges (infrastructure) would be outside of Ireland.

It is first important to acknowledge that progress in this area can only realistically take place at an EU level. As such our recommendations are primarily aimed at policies which the Irish government should bring forward or support at the EU level.

Conclusion

We are impressed by the broad cross-sectoral approach that the strategy takes and strongly support the measures proposed. As outlined above, a closer look needs to be done on details, timelines, delivery and ambition of many of the measures. A close monitoring of the delivery of the strategy is imperative.

We would be obliged to further partake and feed into the discussion around the strategy in the next stages to come. Should you require any clarifications, please email us at tmfcork@gmail.com.

Kind regards

Dr Darren McAdam-O'Connell (Coordinator)

Transport and Mobility Forum

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/>

Appendix 1

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 30 kph 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 weight 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.



Appendix 2

Links to individual consultation documents

[Development of a National Policy Framework for Alternative Fuels Infrastructure for Transport Issues Paper](#)

[Moving Together Draft Implementation Plan](#)

[National Demand Management Strategy Optimal Use of Space Sub-Group Report](#)

[National Demand Management Strategy Fiscal Measures Sub-Group Report](#)

[National Demand Management Strategy Generators of Demand \(People\) Sub-Group Report](#)

[National Demand Management Strategy Generators of Demand \(Freight\) Sub-Group Report](#)

[National Demand Management Strategy Integrated Land Use and Transport Planning Sub-Group Report](#)

[National Demand Management Strategy Captive Car Users Sub-Group Report](#)

[Moving Together Case Studies Compendium](#)