



Transport & Mobility Forum

Cork City Council

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Via online consultation portal

c/o The Environmental Forum
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Public Consultation – Response

National Speed Limit Review – Cork City Phase 2

Built-up and Urban Area Speed Limits

<https://consult.corkcity.ie/en/consultation/national-speed-limit-review-phase-2-built-and-urban-area-speed-limits-%E2%80%93-cork-city>

Dear Sir/Madam,

Thank you for giving the general public and stakeholders the opportunity to feed into the public consultation on Cork City Council's adoption of the recommendation of the 2023 National Speed Limits Review (Phase 2).

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

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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

The TMF is firmly supportive of the overall plans to widely adopt the lower speed limits on Cork City's urban roads as recommended in the National Speed Limit Review.

While in the past, lots of streets in the city have been turned into 30km/h zones, these are predominantly housing estates and residential streets, while on any other roads, 50km/h still apply as the default.

Expanding lower speed limits to a far wider range of inner-city roads would be a tremendous step further in the **transition of the City's transport system towards a sustainable future**, with urban life and the City's overall attractiveness as a place to be benefitting from it.

Where traffic through the mostly narrow roads of Cork will be slower, sustainable means of **active travel (walking, wheeling, cycling) will become more attractive**. The more people feel that walking becomes more pleasant, and cycling safer in close proximity to motor traffic, the more people will be encouraged to switch to sustainable modes for short and medium distances. And also more parents might feel safer letting their **children get to school independently**, freeing up the roads from school run car traffic.

We welcome that Cork City Council will take the step to let 30km/h become the norm on city streets, and 50km/h the exception under clearly defined conditions.

Comments

There are **numerous benefits** on lowering the speeds of traffic on a majority of Cork City's roads:

Safety:

As large parts of the City's fabric developed mostly before the advent of cars as a mass means of transport, cross sections of the street space are mostly too narrow to allow for a safe side-by-side of all means of travel today.

Footpaths often only have a minimum width to cater for two pedestrians abreast. Oncoming pedestrians need to pass by stepping onto the carriageway. The same applies to many bus stops, where there is not room enough for both waiting bus passengers and passing pedestrians. Where

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there are no cars parked along the kerb, traffic moves past pedestrians at speed at less than a metre distance.

Cycling:

While cycling infrastructure has improved in many places over recent years, there will remain many streets where there is simply **no room for an extra lane for cycling**, so cycle traffic would also in future need to share the road with motor traffic in many places. A lesser speed difference between cyclists and motor traffic will increase safety and perceived comfort for many people cycling, as it will encourage more people to do so that today do not feel safe using the bicycle on their daily travels.

Health Effects:

Noise:

Lower speed limits lead to lesser acceleration of motor vehicles. Together with generally lesser speeds, noise levels from car engines in narrow city streets will reduce. Not only will this result in a more pleasant environment for people in confined street spaces, it also reduced serious long-term health effects (cardiovascular diseases) when being exposed to high noise levels on an ongoing basis (e.g. for residents).

Pollutants:

It can be expected that fuel consumption reduces at lower speeds, which results in lower emissions from the exhaust. In addition, non-exhaust pollutants (particles) from tyres and breaks will also reduce, leading to better air quality.

Regarding health and other non-safety related aspects, please also see more in-depth considerations in the annex.

Roads where speed limits should be reduced to 30km/h:

Many housing estates and residential streets already have a speed limit of 30km/h. Collector roads and artery through roads, as well as high-street settings, however, are mostly not included yet.

Streets with **high footfall** (shops, services, main walking or cycling routes) shall enjoy lower speed limits, to improve safety and comfort of those travelling on foot or by bicycle. In shopping areas, this will also raise the **attractiveness of the street** as a place to be and meet, which **local businesses** will benefit from (better conditions for place making).

Streets in the **vicinity of schools** shall have a 30km/h limit by default, to protect young children as the most vulnerable road users. This will also better facilitate an unaccompanied travel to school and promote better development of independence. Alleviating car traffic congestion at school drop-off times would be another positive know-on effect.

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Streets with a high **importance for cycling connectivity** that don't provide the room for dedicated cycling infrastructure should have lower speeds. The formal switch to becoming a Cycle Street (a feature now also introduced to Irish road legislation) shall also be considered.

Effects on traffic flow and public transport:

The effects on travel times for general motor traffic will be minimal. Numerous intersection and signalled junctions put a tight limit to the times where higher speeds than 30km/h would be achievable today. A general lower speed of 30km/h has also proven to smooth and steady traffic flows as less acceleration and braking will occur, keeping overall travel times more or less the same.

The same applies to public transport, where buses will also call at a stop every few hundred metres.

In relation to the forthcoming deliveries of BusConnects' Sustainable Transport Corridors, speed limits along these corridors should be assessed on a case-by-case basis.

Examples of 30km/h or 50km/h roads:

For illustration, we will name a few roads / streets as examples where in our view lower speed limits shall or shall not apply.

Streets with future 30km/h

Blarney Street – a residential street with mostly narrow cross sections, no free flow of two-way car traffic possible ('gap-hopping' required). Similarly: Friars St/Walk

Douglas St – a through road and rat run with a high footfall of pedestrians, pubs, shops etc., high connectivity for cycling, one-way situation at western end invites to drive at high speeds.

Wellington Rd – residential street, important alternative to Summerhill North for cycling

Ballyhooley Rd (St Luke'S) – although a local thoroughfare, this street is purely residential. High volumes of through traffic, confined road space, mostly on-street parking for residents, no space for cycle lanes (esp. for slow cyclist uphill).

College Rd – high footfall along UCC campus, high number of cyclists, highly frequented bus stops with no room for passengers on narrow footpaths, no room for cycle lanes

Bishop St – narrow footpaths, main walking/cycling route from City Centre to UCC, no cycle lanes, blind corners (around St Finbarr's entrance), school.

Victoria Cross Rd – hot spot for through traffic to the West, tight bends (at river bridge), high pedestrian footfall (student accommodations), cycle traffic with no room for separate lanes and no real alternative routing.

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Streets that might qualify for 50km/h

Tramore Rd (east) – mostly industrial setting, few pedestrians, adequate cross section

Lower Glanmire Rd (east of Kent Stn) – artery road to the East, several bus routes, limited residential use, limited pedestrian footfall

Model Farm Rd – artery to the West, wider cross section, (partly) cycle lanes, bus corridor, housing with wider front gardens

Delivery and Effects

Despite the fact that many urban (main) roads will see a change in road layout in the future (e.g. through Bus Connects), a wider spread introduction of lower speed limits can be **delivered in a far shorter time frame** (and at far lower cost) and subsequently **yield tangible effects** on road safety and higher attractiveness of active travel in a timely manner. Given the required bye-law processes and signage (a concise signage concept would be required!), the first lower speed limits could be delivered in the course of a year (2027).

Conclusion

For the reasons outlined above, the Transport and Mobility Forum would highly welcome and support the wider spread introduction of lower speed limits on Cork City's urban roads, following the National Speed Limit Review.

Lower speed limits would **deliver on the high-level goals of national, regional and local policies** regarding road transport, i.e. putting walking and cycle traffic first, followed by public transport, commercial and eventually private motor traffic (see also hierarchy in DMURS). It would have a highly positive effect on road safety for vulnerable road users in the city and make the use of sustainable transport modes (active travel: walking and cycling) more attractive and subsequently encourage more people to use active travel as an alternative to short distance car travel.

Lower speed limits will support a **modal shift** away from private car use and hence contribute to the **carbon emissions reduction target** for 2030, has proven exceptionally challenging for the transport sector.

Last not least lower speed limits will benefit public health (noise, pollution) and the general quality of life for the city and its inhabitants.

We would hence firmly encourage Cork City Council to adopt the proposed plans.



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We would be obliged to further participate in the discourse and planning processes around this and other Active and Sustainable Travel improvement schemes and policies 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

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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/>

- Appendix -

Appendix:

Other positive effects of 30 km/h or Lower speed limits beyond road safety

Lowering urban speed limits to **30 km/h (or lower)** delivers large, measurable benefits that extend well beyond fewer crashes and injuries. Slower limits produce **disproportionate reductions in harmful environmental exposures**, improve **social cohesion and public life**, and reduce **pavement damage and long-term infrastructure costs** — together creating net public-health and economic gains. The evidence below synthesises peer-reviewed reviews, technical assessments, and policy analyses.

Health Pathways beyond Crash Reduction

- **Traffic noise is a leading urban environmental hazard.** Road traffic is the dominant sound source in cities and is linked to sleep disturbance, cardiovascular disease, cognitive impairment in children, and mental health harms; WHO ranks environmental noise among the top environmental threats to health.
- **Particulate matter from vehicles remains a major health risk even as tailpipe emissions fall.** Non-exhaust emissions (brake, tyre, road surface wear and resuspension) now account for a growing share of traffic-related PM_{2.5} and PM₁₀ in urban hotspots and are associated with respiratory and cardiovascular morbidity.

Why Lower Speeds Deliver Exponential Environmental Gains

- **Noise falls nonlinearly with speed.** Empirical studies and modelling show that modest speed reductions (e.g., from 50 to 30 km/h or from 30 to 20 km/h) produce several decibels of reduction; because decibels are logarithmic, a 3 dB reduction roughly halves acoustic energy and combined behavioural changes (smoother acceleration/braking) can yield much larger perceived quieting. This effect is strongest in dense urban “street canyon” settings where traffic noise dominates.
- **Lower speeds reduce non-exhaust particulate generation per kilometre.** Slower, steadier driving reduces tyre abrasion, brake engagement and road dust resuspension — the principal mechanisms for non-exhaust PM. As exhaust emissions decline (EVs, filters), the **relative** and often **absolute** importance of brake and tyre particles rises, making speed control a primary mitigation lever.
- **Road wear and dynamic loading scale with speed and harsh manoeuvres.** Higher speeds increase dynamic vehicle loads and the frequency of aggressive braking/acceleration, accelerating pavement deterioration and increasing maintenance frequency and lifecycle costs. Slower speeds extend pavement life and reduce repair costs.

Social and Economic Co-benefits

- **Improved sleep, cognition and productivity.** Lower ambient noise improves sleep quality and daytime concentration, reducing healthcare costs and lost productivity associated with chronic noise exposure.

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- **Stronger street life and local economies.** Quieter, calmer streets encourage walking, cycling, outdoor dining and retail activity; evidence from city-wide 30 km/h schemes shows modest modal shift to active travel and improved perceptions of liveability, which supports local businesses and property values.

Why This Matters in an Electric Vehicle Future

- **EVs reduce engine noise and tailpipe PM but increase tyre and brake wear impacts, due to the extra weight of batteries.** At low urban speeds the acoustic benefit of EVs is greatest, but above ~25–35 km/h tyre and pavement noise dominate; likewise, non-exhaust PM will remain a leading source of urban particulate pollution unless driving behaviour and speed are addressed. Slower limits therefore amplify the public-health benefits of electrification.

Conclusion

- Lowering urban speed limits to 30 km/h or lower is **a high-impact, low-cost public-health intervention.** It reduces the dominance of traffic in urban soundscape, cuts non-exhaust particulate generation and slows pavement degradation — delivering measurable health, social and economic returns that beyond the safety benefits most commonly cited. For these reasons where roadways are in close proximity to residential areas, schools, recreational, or retail areas lower speed limits must be considered even if the road alignment could support higher speeds from a purely road safety perspective.