



Transport & Mobility Forum

RSES Submissions,
Regional Planning Unit,
Southern Regional Assembly,
Assembly House,
O'Connell Street,
Waterford X91 F8PC

Transport and Mobility Forum
Cork

8th March 2019

Comments to the Draft Regional Spatial Economic Strategy for the Southern Region

Dear Sir/Madam,

The Transport and Mobility Forum, Cork (TMF) is a representative group of organisations who have a common interest in sustainable travel. TMF fully support sustainable modes of travel measures and policies. Sustainable and Active travel helps reduce congestion on roads, improve air quality, supports a low carbon economy, reduces noise pollution and improves public health.

Thank you for the opportunity to feed into the Regional Spatial and Economic Strategy (RSES) process. We attended all the stakeholder events and found them very worthwhile. We also appreciated the presentation delivered to our group by two of your regional planning officers, Bryan Riney and Robert Fennelly and found the discussion with them very valuable to our group.

Please find below general comments followed by a more detailed list of recommendations concerning the 3 chapters and sections most relevant to the TMF; Connectivity (section 6.3), MASP 8 (p 225) and Chapter 9 (Implementation). While we fully appreciate the remit of the RSES is broad and therefore intentionally omits specifics, we believe more detailed guidance and parameters should be laid out in the RSES so as to ensure proper application at the county/city and local level. We therefore include recommendations for such specifics in the themes and areas we are most knowledgeable of- Sustainable Transport and the Cork City and County area. We are also aware that the eagerly anticipated CMATS (Cork Metropolitan Area Transport Strategy) due to be published soon will cover this level of detail but the RSES should inform this core strategy closely before it is published rather than relying on Monitoring and Evaluation Measures post-publication.

General Comments

Travel and transport in their quality (mode) and quantity (distance) are a direct result of where facilities of everyday use (housing, employment/education, retail etc) are located. Getting the spatial structure right in a way that favours shorter distances is the first important step to facilitate a modal shift to more sustainable travel. In this respect, getting the RSES "right" is of vital importance for the decades to come.



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The TMF finds the general direction of the RSES very welcome and forward thinking. We fully support the function the RSES has as an implementation strategy for the NPF and NDP, the role the strategy plays in the alignment of capital spend, regeneration and other competitive funds with the NDP and all other County, City and local plans and the marrying together for the first time, Regional, Spatial and Economic Planning. At its core, we are aligned with the Sustainable Development principals of the Strategy which aims to ‘...offer more sustainable choices and options for people, businesses and communities that can positively influence more sustainable patterns of living and working...’. We also understand the challenges of accommodating significant growth, as raised in the Draft Strategy, in line with the National Planning Framework.

Compact Growth, Transport and Quality of Life

We fully support the Strategy’s priority for compact growth whereby fill-in and brown field developments are given priority over green field developments with new developments and retrofits having higher population densities than before thereby enabling high quality public transport to be economically viable (BRT, eventually light-rail, etc). This density is further outlined in the detailed comments below which also addresses the need to pair it with permeability as a judge of how easy residents can access services. It is vital that these higher density communities enjoy an excellent quality of life. This is realised through the provision of accessible and high quality public transport with attractive fares, walking and cycling infrastructure that is eventually carbon neutral. As well as this, people living in these urban areas should be able to access all every-day services and amenities within a 5/10 minutes walking radius. The public realm should be pleasant including quality green spaces for wildlife and recreation, parks and playgrounds, pedestrianised areas with high quality public seating, a vibrant Arts and Cultural Scene and streets for play. This all results in community engagement, place-making and a rich vibrant healthy place to live.

With this in mind, the TMF would stress the importance of adopting a holistic approach where all stakeholders are encouraged to work together and decisions are made outside of individual silos and with only economic growth in mind. Another fundamental aspect of realising such inclusive and participatory decision making is to place much higher value on the work done every day by volunteers and those people in communities who tirelessly work towards making their areas more liveable for all. Another important aspect of engaging all stakeholders in adopting the RSES principals is through behavioural change programmes, media campaigns and other ‘soft’ measures. The RSES should therefore invest in such.

Sustainable Transport and Active Travel

The TMF welcomes the aims outlined in section 6.3 on transport Connectivity. A more detailed critique features below but we would like to emphasise certain points. The need for increased investment in walking and cycling infrastructure is of primary importance. Priorities should be given to projects that; significant improvement of the quality, affordability and reliability of public transport and their transition towards a low-carbon fleet; infrastructure projects that enhance the public realm and make walking and cycling in the city a more pleasant and efficient way to travel; cycling infrastructure that is gold standard, segregated and routes that are continuous and connected; walking infrastructure that is safe, accessible and increases the permeability of an urban area. We would like to see far more reference to all travel modes including Park+Cycle, Park+CarPool, Park+Stride, etc. and more



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information on the inter-connectivity and integration of transport modes, higher quality interchanges and integrated ticketing systems. The issue of pay parking in urban areas should be carefully managed, dissuading the private car in the city centre and the conversion of car park spaces to set-down spaces. Any investment in Roads should be primarily aimed at increasing Public Transport capacity. Water Transport should be featured in the RSES. Public Transport in rural areas is of vital importance and rural communities should be able to access a high quality rural transport link.

Implementation, Monitoring and Evaluation

The TMF would like to strongly emphasise the need for clear monitoring and reviewing mechanisms to ensure the implementation of the RSES is monitored at every level and phase. We support the creation of monitoring committees made up of representatives of all sectors and the sharing of up-to-date baseline data in order to feed into the creation of informed indicators. We strongly believe monitoring should occur far more regularly than outlined in the RSES and the monitoring committees should also include more local level sub-committees who meet often and feed back to the Regional Assembly on a regular basis.

Language used

The TMF would like to however point out that the language used in the Draft Strategy is often very weak and vague (“should, might, where appropriate” etc.). We feel there is a concern that this will provide loopholes not to implement structures in the way intended by the RSES.

Specific Comments on relevant chapters

Chapter 6- Connectivity

- The TMF strongly supports the objective *“To transform our transport systems from polluting and carbon intensive modes to well-functioning integrated public transport, walking and cycling and electric vehicles”* and the objectives as outlined in section **6.3.3.1** | The Role of Transport
- The following insertion should be made- ‘The safe travel requirements of all people, irrespective of age or mobility (add:) and transport mode, should be met;’
- The TMF supports the focus points as outlined in section **6.3.3.2** | Framework for the Integration of Transport Planning with Spatial Planning Policies. We would like to highlight the need to safeguard the alignments (and planning status as Railway) of disused railway lines for possible later use, e.g. by converting into greenways (*because once the land is sold and built upon, the line is lost forever*).
- The TMF believes that *‘Improvements to walking and cycling provision in towns and villages’* should include the re-distribution of street space and upgrade of public realm and urban design (*as soft factors, going beyond engineering tick-box exercises, compare concepts e.g. by urban planner Jan Gehl*).
- There should be an inclusion of multi-modal hubs, also Park & Cycle and Park & Walk for those large segments of the population not living on a Public Transport route
- Regarding Table 6.1 – policy docs, the TMF would like to point out that the National Cycle Policy Framework is missing from this list.

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- The TMF strongly support the objectives outlined in **RPO 146** but feels that stronger wording is desirable (“shall” instead of “should”, ...) for example in Point 4: *New employment and residential development should be consolidated in a manner that they should not occur in locations not well served by existing or proposed high capacity public transport;* The use of the word ‘Should’ here could lead to the delay in the provision of high capacity public transport. The language instead should read ‘Shall’. Regarding Point 6: *All non-residential development proposals should be subject to maximum parking standards;* A clarification is needed here on what ‘Maximum’ means and if this is an upper limit?
- With regards to **RPO 147** Point 2: *‘Measures to facilitate the complementary use of private car, through appropriate local traffic management including the siting of destination car-parking, is central to achieving the correct balance of modal use’.* LAs may (or better should) consider requiring any parking provided as part of any residential developments in designated areas would be sold/rented separately to the housing units rather than included in the price of accommodation. Regarding Point 7: *‘Cycle parking should be appropriately designed ...’*, different standards for different user groups: a) residents / employees and b) customers / visitor should be provided. Regarding Point 8: *‘For all major employment developments and all schools, travel plans should be conditioned...’*, the following insertion should be made- *‘travel plans with strong emphasis on sustainable travel modes’* and this should also apply to larger residential developments.
- With regards to **RPO 148**: *‘Protect and enhance the capacity of the National and Strategic Regional inter-urban road connections’*, enhanced capacity shall primarily serve better public transport (e.g. bus lanes), otherwise enhanced capacity will attract further car traffic
- **RPO 151**: ... ensure quality levels of safety, service, accessibility and connectivity to transport users’, add at the end : ... of ALL transport modes.
- A far higher proportion of funding allocation must go into sustainable travel infrastructure projects if the RSES is to be realised. This should be mentioned in the document.
- The TMF is fully supportive of the points raised in **section 6.3.6 | Transport Investment Priorities**.
- With regards to **RPO 155** Point 2: *‘Support initiatives under the Department of Transport, Tourism and Sport to reduce congestion in our region’s cities and add: primarily by enhancing sustainable travel options through Smarter Travel projects that include traffic management, bus priority, urban cycling and urban walking routes; Add: investments to facilitate multi modal travel. (only Park+Ride is mentioned). Missing: Bike and Ride (both at front and tail ends of Public Transport journeys, where suitable), Park and Cycle, Park and CarPool, Expansion of public bike sharing schemes, facilitation of CarSharing (GoCar style). Also important: **Combi of Bike and Train**: Enhance facilities to carry bicycles on train services (both commuter (incl. peak services) and intercity.*
- The potential of Water transport is missing here- Consideration shall be given to enhanced ferry services in the three main cities. Examples in Cork Harbour is a new water link between Cobh and Ringaskiddy. Link to Little Island, a Feasibility study for a WaterBus from the Lower Harbour into Cork City.
- **General observation**: very little is said about multi modal travel, different travel modes seen too much in isolation

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- **RPO 157 Higher Densities:** Higher densities are fully supported but they are not defined with the necessary figures such as population / km². For example, all Cork City (average) has ca. 4000 pop/km² compared to the Vauban neighbourhood in Freiburg (SW Germany), a model sustainable neighbourhood, has 13500 pop/km². In fact, this density is on the lower end of the spectrum with some French and Spanish municipalities and indeed areas of Cork like parts of the South parish exceeding 20,000/km². 20,000-50,000/km². Therefore, 10,000-12,500/km² should be viewed as a minimum density for walkability not a target.
- **Permeability:** Densities must always be measured with permeability and how walkable or cycleable urban areas are especially considering those with mixed mobility or older people needing to access services. The permeability of compact high density communities therefore needs to be improved and included in any new development. Laneways, narrow roads and other walking/cycling short-cuts should be well maintained, with high quality road surfaces and well lit up at night. Where new development are being built on brown field or in-fill sights, paths should be incorporated where possible and permeability should always be considered.
- **6.3.6.3 | Cork Metropolitan Area Transport Investment Priorities:** It is vital to ensure that we are building an economy and supporting infrastructure that can adapt to the jobs of the future.
- Importance of continued infrastructural investment irrespective of economic cycle. Counter cyclical investment
- Importance of state investment in replacing rail and bus fleets to a low carbon fleet.
- While the different points raised seem all good (esp A, B and D), there is a striking imbalance between specifically mentioned projects, particularly comparing C (road projects, a long list) and E (cycling – NOTHING specific). This appears to be detrimental to the overall (progressive) spirit and main direction of the RSES document. It must be kept in mind that funding will always be an issue, and money can only be spent once. Without clear prioritisations and more balance between infrastructural projects, road projects could potentially absorb investment.
- Road projects shall be thoroughly assessed as to their essential necessities such as and long term effects, especially prestigious projects like the M20 and M28, given their cost. The actual need for full motorway standards along the entire route must be subject to critical review, especially given the tremendous benefits that a fraction of their cost can have when invested e.g. into city and suburban cycling infrastructure.
- The lists in this section also reflect (again) a very segregated approach to individual transport modes, with lack of a holistic, inter-connected view.
- One road project in Cork city to prioritise is the construction of the NRR to complete the ring and free up small local roads for more sustainable travel and community links
- With regards to 'The development of an enhanced metropolitan area-wide public transport system, including high quality bus corridors, it is important to note that buses should be prioritised over car traffic, e.g. at junctions.
- When referring to 'greater opportunities for interchange with other modes', car and bicycle should be included.
- The option of Bike+Ride is missing from point 6 as well as bike stations for overnight storage for incoming Public Transport commuters



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- Regarding network improvements, the present PT network is mostly oriented towards the city centre. Orbital services should also connect the hinterland with peripheral employment hotspots for example in Cork: serving the Mahon cluster, a bus link from East Cork (Dunkettle) along the N40 South Ring, or Carrigaline to Mahon and Wilton + CIT/CSAIP areas.
- In point 17 'Advancing transport study measures for Little Island', this shall be with an emphasis on a holistic approach, comprising ALL modes, and serious management of car access and parking
- In section (D) 'The optimal use of the inter-city and commuter rail network', a suggestion for the Cork-Cobh/Midleton commuter rail could be, given the large amount of new stations proposed (a very positive proposal), consideration shall be given to convert the East Cork lines to light rail ("TramTrain"), in case the east-west transit corridor in Cork City shall be upgraded to light-rail. With heavy rail technology, particularly running on heavy weight diesel units, a doubling of stops along the line would result in significantly longer journey times (poor acceleration). Light rail vehicles are much more flexible, and extensions into Midleton (and Cobh) town centres will become an option, as well as integration with Cork City light rail. Principal decision in this case to be made: This would most likely include ceasing of all heavy rail operations (option for freight trains) east of Kent station, as 1600mm IE track gauge unlikely to be applied to (inner city) light rail (Luas: 1435mm), hence track conversion necessary [Ref: see "Karlsruhe Model" in Germany, replicated in various other cities in continental Europe]
- **Cork - Dublin line:** Cutting journey times on the inter-city services will be desirable, but the option of a new high speed line (i.e. > 250km/h) appears highly unrealistic, given the exorbitant cost to be expected and the little benefit for a 280km distance. Partial upgrade of the existing line to 200km/h and electrification should be far better value for money.
- **The development of a metropolitan wide cycle network:** There is a disappointingly lack of information given under this heading. We would like to see it include:
 - High quality cycle route network with large proportion of segregated cycle tracks
 - Safe cycling infrastructure to cater for the needs of ALL groups of cyclists, esp. novices, school children, the elderly
 - Safe cycle routes especially in the approach to schools
 - A continuous segregated east-west Greenway through the city centre, connection to large commuter towns Ballincollig and Carrigaline (see "Lee to Sea" proposal)
 - Docklands and Tivoli development areas must be connected to city centre (and other employment hot spots like e.g. Mahon, Little Island) with a continuous segregated cycle track, [linking Tivoli by on-road cycling on the Lower Glanmire Road N8 as a default will be a NO-GO!!]
 - Set up of large capacity cycle parking in the city centre, with specific standards for a) customers/visitors and b) employees
 - Creating a safer environment for cyclists off the arterial roads shall be supported by large scale 30km/h limits (except for main arterial roads) and adequate junction re-design [so far, cycle tracks usually are built between junctions only, creating a patchwork and missing out on the most dangerous parts, i.e. junctions)]
- **RPO 158 Investment in Strategic Road Connectivity:** add: Facilities for cycling and walking shall also be reflected, particularly in and around urban areas.



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- **RPO 163 Bus:** This is fully supported.
 - o Bus Connects in all 3 cities should be fully supported
 - o Add: for better connectivity in rural areas, consideration shall be given to Community Buses, based on volunteer drivers (compare NL “Buurtbus”, DE: “Buergerbus”)
 - o Add: Upgrade of bus fleet to low carbon / low emissions / e-bus where possible as well as all buses to be accessible by people of mixed mobility
 - o New fare structure: Highly supported. Fare structure must be fully integrated (ALL modes, incl. BikeShare and CarShare), more simple, easy to understand and attractive (more Zone oriented rather than corridor, e.g. unattractive that for the commuter rail, one has to choose between Cork- Cobh OR Cork Midleton, why not have both in a package?)
- **RPO 166: Walking and Cycling:** Fully supported in principle, but:
 - o In comparison to other modes, the points here remain very vague with no specifics mentioned. The language regarding environmental impact appears to build up potential blockages for implementation.
 - o Improvement of walking and cycling accessibility and safety to include the “whole of journey” experience
 - o Creation of improved linkages for walking and cycling routes, away from heavily trafficked routes
 - o Greenways: Emphasis in Greenway development shall be on developing a continuous and interconnected network of Greenways that also reaches into the Metropolitan areas and urban centres and can also serve as commuting infrastructure locally (e.g. proposed Cork Lee to Sea GW). Greenways as isolated recreation-only facilities (where people have to DRIVE to in order to cycle) **shall** be avoided. The connection of Cork to the Dungarvan-Waterford-Rosslare Greenway with its link to Dublin & Galway via the Midlands canal network is of extremely high priority and as the Youghal-Dungarvan link will be particularly expensive to build in comparison to other Greenways of similar length it is unlikely to be built unless it has formal priority.
- **Reliability of delivery:** Delivery of transport infrastructure esp. for new trip intensive developments must be reliable (funding provided within appropriate timeframe). Example (4.1 p.223): *“...trip intensive developments, such as high employment density offices and retail, should primarily be focused in locations which are well served by existing or proposed high capacity public transport corridors.”* Planning permission for such developments on the basis of “proposed” hi-cap Public Transport must depend on the actual delivery (and funding) of said Public Transport infrastructure / services within due course.

MASP 8 / CMATS (p 225)

- Fully support in general
- In relation to point (h) Cycling: include “high proportion of segregated cycleways to provide a safe infrastructure for all groups of people cycling”. Missing here: integration of all sustainable travel



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modes: All Public Transport, cycling, walking, BikeSharing, CarSharing, CarPooling etc. Also missing: sustainable inner-city freight services (deliveries!!), e.g. by smaller electric vans, e-cargo-bikes etc (facilities for storage and re-loading required)

- In relation to avoiding congestion issues related to the school run and cut travel distances, any new schools should be built in locations that are accessible by cycling/walking from the main catchment area. And schools admittance procedure should prioritise pupils living nearest the school thereby creating more likelihood for walking and cycling to school.
- The creation of multi-modal hubs throughout the city and county
- Investment should be given to the creation of an integrated ticking system
- The value of behavioural change programmes in order to enact a seed change away from the private car cannot be emphasised enough. These programmes should therefore be fully supported, in a long-term way and properly resourced

Chapter 9- Implementation, Monitoring and Evaluation

- 'What does 'Streamlined Governance Arrangements' mean?
- Strategy must be reviewed within 6 years – this is the mid-way point and is far too late for the first review
- Mechanism of review- Regional Assembly. It must be ensured that the structure of the Regional Assembly decision making process does not dilute NDP and RSES principals.
- We welcome the establishment of an independent Office of the Planning Regulator (OPR) with an independent monitoring role as outlined in RSES. More detail is needed on how the 'new set of indicators' will be to be developed and who will both feed into these and review them.
- We welcome the plans to establish a Monitoring Committee within 3 months of RSES publication and the broad range of representatives who will together generate key regional indicators and milestones. We believe it should at least meet annually or have sub-committees working at more local levels and have local indicators and milestones clearly outlined.
- Additional annual data is needed to the Census data and we welcome the use of 'regularly updated new data' and the open publication of such. This ongoing consideration of new data should feed into all indicators ensuring they are based on the most up-to-date statistics and 'to facilitate evidence-based policy making and evaluation in the Region'
- We welcome the facilitation of 'data sharing and exchange on transboundary sites and to address cross-boundary site and species protection' and would like to see more clarity on how this data sharing be facilitated and to who it will be shared with
- The availability of transparent project plans, timelines and budget availability ie project tracker and interim milestones across specific projects and progress indicators is essential



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- There should be a high degree of transparency around targets relating to density and economic growth and current baseline ie progress tracker

In conclusion, the TMF commends the great work done on the RSES and hopes with more detail, stronger language and more robust Monitoring and Evaluation, the Strategy will guide the region towards a sustainable, healthy and vibrant future for all.

Should you require any clarifications, please email me at tmfcork@gmail.com.

We look forward to hearing from you in due course.

Kind regards

A handwritten signature in blue ink, appearing to read "Stephan Koch".

Stephan Koch (Chair)
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.*