



## Transport & Mobility Forum

### **Sustainable Mobility Policy Review**

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## **Public Consultation on a Review of Sustainable Mobility Policy**

28<sup>th</sup> February 2020

Dear Sir/Madam,

The Transport and Mobility Forum, Cork (TMF) is a representative group of organisations who have a common interest in sustainable travel \*. The TMF fully supports 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.

The revision and update of Ireland's Sustainable Mobility Policy (SMP) is an important process, as this will guide Ireland's transport policy and policies on related fields for the next decade or so. The updates of the now expiring policy papers "Smarter Travel" (ST) and "National Cycle Policy Framework" (NCPF, both from 2009) need to be carefully compiled and must reflect changes and further development in technology, services available, society and the ever more exacerbating situation regarding the Climate Crisis. While both the Irish government and cities like Cork have formally declared a Climate Crisis Emergency, implementation of the measures proposed in the two 2009 policy papers (ST and NCPF) are lacking far behind their targets. Hence a new Policy needs to cater for both long-term projects as well as for generating first tangible results in the short term.

For transforming Ireland's transport sector towards a sustainable and future proof transport system, decisive action and ambitious targets need to enter the updated Sustainable Mobility Policy. This Policy needs to reflect and incorporate state-of-the-art best practice examples from Europe and



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beyond, radical changes in how transport is organised in Ireland, ambitious targets in modal shift and rigorous monitoring of the measures' implementation within the envisaged time frames. This policy also needs to have a broader approach that reaches far beyond the "silo" of traditional transport policies, i.e. into land use planning, building guidelines and standards, school policies, waste collection etc., hence cross governmental approaches and actions are vital for its success.

In order to get a broad input from civic society that goes beyond the broad range of members within the Cork TMF, TMF and Cork City Public Participation Network have held a joint public event in January 2020 asking for input into our submission to Ireland's new SMP, with over 50 participants. Many of the issues raised we incorporate into this submission.

While we are aware that the SMP will address policy for the entire country, many of our points raised will more relate to urban areas and local experiences from Cork.

### **Active Travel (walking and cycling)**

Walking and cycling are transport modes in their own right and must be planned for and funded as such. They are the most resource efficient mode of transport. Cycling would cover a radius of ca. 5km and can hence cover the area of most urban areas in Ireland, while often being the quickest travel mode in peak times. With electric bicycles becoming more and more popular, this radius can well be extended to 10km or so.

Yet cycling and walking infrastructures often have a severe shortfall in quality levels caused by half-hearted design, unbalanced distribution of road space, poor maintenance, lack of parking enforcement and often close vicinity to large volumes of fast-moving motor traffic. Safety is a major concern especially in the case of cycling.

#### **Footpath design**

Footpaths must be safe and inviting for walking and stopping for social contact. Minimum widths must apply according to their location in the town/city and to footfall numbers. Two persons shall be able to comfortably walk side by side, one with a baby pram. In streets with traffic speeds over 30km/h, an additional verge must offer protection against moving vehicular traffic.

#### **Refuse Bins**

Although the question of refuse collection and wheelee bins seems to be offtopic for sustainable travel, it has proven in practice to be a big impediment to safe walking in urban areas.

In many places, in particular where houses have a closed frontage with no front gardens, wheelee bins are often left permanently on the footpath. This reduces the effectively usable width of narrow enough footpaths down to levels that are unsafe for walking. Vulnerable road users, e.g. elderly, parents with baby prams, children, wheelchair users often cannot pass bottlenecks on the footpath, negotiating wheelee bins and light poles and the kerb.

A new SMP that promotes and facilitates walking must also address alternative storage locations for refuse bins in such areas.

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### Road drainage

Apart from actual footpath design, **rainwater** is a huge impediment to the quality of service for walking in the city. Experience tells that many of storm water drains do not work properly, and streams of rainwater run down the kerbs before they accumulate at the next major junction and passing motor traffic splashes pedestrians when passing through puddles / streams near the kerb.

A fully **functioning storm water drainage** can substantially contribute to a more positive walking experience.

### Signalled Junctions.

Higher priority / reduced waiting times for **pedestrians at signalled junctions** are needed. A 4-way-GREEN for pedestrians twice per signal cycle instead of once shall be considered. A “continental style” signalling with pedestrian green in parallel with motor traffic shall be looked at, where turning motor traffic must give way.

### Permeability / Connectivity

New developments, especially housing estates, must be connected to the surrounding street network by more than one access point. Connectivity within the neighbourhood must be provided for cycling and walking in various directions. Access to public transport (e.g. bus stops) and local shops and services as well as schools must be facilitated for active travel without major detours (**filtered permeability**).

Connectivity of the existing street fabric, particularly between housing estates, must be improved (retrofit permeability). Closure of existing laneways shall not be allowed, except for exceptional circumstances in individual cases.

A programme for retrofitting connections between housing estates, in order to facilitate walking / cycling to local services without major detours, away from heavy motor traffic, must be introduced. Where necessary, private land shall be acquired by the local authority to retrofit pathways. Funding for such cases shall be provided.

Fears of antisocial behaviour must be tackled with adequate design of paths and laneways.

### Tackle Anti-social behaviour

Permeability and connectivity for walking and cycling in (sub)urban neighbourhood is often blocked by residents out of **fear of antisocial behaviour** (no clear definition, very subjective what this is). Local councillors hence tend to give in to such concerns and often vote against projects to open laneways for better connectivity. Yet, such connections are vital for promoting active travel and contribute to a significant modal shift away from motor traffic, especially for short distances.



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Fears of antisocial behaviour shall be challenged by empiric research and best-practice examples. Adequate urban design must play a vital role in addressing the phenomenon and related fears. It appears absurd that a (real or perceived) social problem should block reasonable efforts to transform the urban built environment in order to enable a healthier, emission free and safer mobility (for walking and cycling) within and between neighbourhoods.

### Cycling:

Cycling has a **huge potential** to substantially raise the levels of active travel and replace short car journeys in metropolitan areas. Despite the continuous growth over recent years, uptake of cycling – also by a broader demographic – still falls short compared to other countries. One major deterrent is the lack of safe and convenient cycle infrastructure. For many still, the dangers to cycling imposed by the dominance of motor traffic are a severe discouragement to use the bicycle in everyday life.

Cycling must be understood, promoted and facilitated as a system, consisting of safe and convenient infrastructure, parking facilities including storage at home, availability of bicycles, integration with other transport modes, route mapping and signage, and adequate skills to cycle safely in road traffic.

A future proof SMP must address all these aspects and promote cycling from all angles, in order to deliver substantial modal shifts within a short and medium timeframe.

A future proof **cycling infrastructure must be safe, convenient and coherent**. Cycle paths on main routes shall be segregated from motor traffic to allow for safe cycling for all ages and abilities. It must feel safe enough for parents to let children cycle to school on their own.

Cycle paths (lanes or tracks) shall be provided on all new roads with speed limits higher than 30km/h. Agreed design standards (National Cycle Framework, DMURS) must be adhered to wherever possible.

National Greenway Strategy (Background paper p11) focuses on greenways as leisure and tourism facilities. **Greenways shall equally be designed and used as safe commuting infrastructure** in the approach (and also inside) towns and cities, connect to local shops and schools and other services. The dual-purpose character of Greenways must be embedded in the updated strategy.

The further **proliferation of e-bikes** (pedelecs) must be acknowledged and incorporated into the SMP, as e-bikes will open cycling to entire new demographics, areas (topography) and will widely broaden the acceptable range for cycling commuting distances. (this aspect was e.g. sadly neglected in the draft CMATS, published in 2019).

**Cargo-Bikes** (manual or electric) offer a whole new range of transport options for families and businesses. Infrastructure layout (paths and parking) shall also reflect the needs for cargo-bikes, child trailers, as well as bicycles for mobility impaired people (e.g. hand-pedal bikes).

Bicycles as a transport mode must be easily accessible to their (potential) users. The roll-out of **public bike sharing** e.g. in Cork had a tremendous positive impact on the uptake of cycling in the city, as it

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provides spontaneous use and facilitates one-way journeys. These successful schemes shall be largely expanded. The introduction of e-bikes for public sharing would be a consequent next step, especially in places with a hilly topography.

For occasional transport needs, **cargo-bikes** shall also be made available on a **sharing basis** (see also “mobility as a service”).

Cycle lanes on the carriageway must be effectively **kept clear from illegally parked vehicles**. This shall happen through either physical separation (bollards, planters, ...) or a rigorous enforcement. Local Authorities must be supported to provide the necessary manpower to sanction illegal parking on cycle lanes, bus lanes and footpaths.

LA's and Gardai must be more rigorous (and enabled to be) in **enforcement of parking** regulations, i.e. to tackle illegal parking on footpaths, cycle paths and bus lanes, in order to ensure safe and efficient use of same and to raise full potential of tax payers' money investments.

### Quiet routes for active travel

As a consequence of street layout (cul-de-sacs) especially in suburban areas, people walking or cycling are likely to be forced onto motor traffic dominated main roads with often insufficient space for active travel. Improved permeability shall be used to establish **alternative “quiet routes” as a convenient option for active travel**. These routes would be safer and often more direct than routes following the roads for motor traffic. This aspect is of particular importance for the access to schools, so that children can walk or cycle safely on their own (also see below under “Schools”). A main road even with a cycle lane still remains a main road with people forced to cycle (or walk) close to fast moving heavy vehicles.

### Active Travel and Motor Traffic

#### Speed limits

Active travel suffers from an imbalanced distribution of road space, but also from motor traffic at far higher speeds and far too close to where people walk or cycle. This is a danger particularly for vulnerable road users like children, parents with buggies, the elderly or mobility impaired people. As a consequence, walking or cycling is often replaced by driving (e.g. parents) or staying at home (e.g. elderly).

While the ongoing introduction of more and more 30km/h zones (mostly in residential areas) is welcome, it is still hard to change speeds on inner city main roads. Local authorities shall be allowed to introduce a **default speed limit of 30km/h** in built up areas, with 50km/h being the exception that only applies to through roads which meet a certain standard for walking and cycling.

Lower speeds of motor traffic shall also be induced by simple design changes. Excessively wide radii at junctions shall be narrowed, to slow down turning traffic and provide more space (and visibility) for pedestrians. The arrangement of parking on alternating sides of the street will slow down through car traffic. In addition, trees can support this and contribute to the upgrade of the public realm.

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Regarding funding, local authorities (LA) need to be put into a position to introduce local speed limits (lower than 50km/h) independent of government's specific funding schemes. As an example, situation now is that funding for speed limits is only available to residential streets where the actual speeds driven on the ground already are far below 50km/h, so it will only be put into legislation what is happening on the ground anyway. This is since funding is only available for setting up signage, but any further redesign of the carriageway (in order to actually reduce speeds) is not within the scope of this funding. So actual change is NOT facilitated.

A new SMP shall encourage such changes and make funding available to local authorities for such relatively small-scale interventions.

### Roads design in residential areas

The streets in residential developments shall be designed as Slow Zones (with a speed limit of 30km/h or lower) according to the principle of **Legible Streets**. Slow speeds for vehicular traffic must be reflected in the design, cross section and materials applied for such streets.

**Alternatives to the standard cross section** of "footpath, kerb, carriageway, kerb, footpath" shall be applied where possible. Speeds shall be reduced by alternating parking layout and trees in the street space that result in undulating driving paths.

In order to substantially improve walking and cycling experiences, the recommendations of DMURS shall be adhered to, as many traditional frontage free collector roads provide a hostile environment for active travel.

## Spatial Planning

Substantially higher densities of towns and cities are required to support means of sustainable travel. Walking and cycling are sensitive to longer distances. Public transport is dependent on minimum population densities in order to be financially viable. We fully support the relevant objectives in this regard made in recent policy papers like RSES (Southern Region) and CMATS.

Spatial planning plays a vital role in facilitating the successful transition to a sustainable transport and mobility system.

**Low-car residential developments** must be encouraged and facilitated in suitable locations (urban and peri-urban), and city / county development plans must allow / encourage this accordingly as a compulsory feature, as well as building regulations. Such developments shall include hi-quality PT access and service, car- and bike sharing facilities (incl. e- and cargo-bike rental), high permeability for active travel etc. (compare sustainable model neighbourhoods like e.g. Freiburg-Vauban in SW Germany).

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### Schools:

Schools can and must play an important role in shifting towards more sustainable travel.

For many parents, bringing children to school results in longer travel distances on their commute which far too **often leads to car dependency**. Driving children to school leads to dangerously high volumes of car traffic near the schools that puts children at risk.

Schools as local trip attractors **must be accessible** for most of their students **safely on foot or by bicycle**. Children shall be able to get to school unaccompanied. This would be beneficial to their autonomy and would offer the parents more options to commute by alternative modes.

All new schools (primary / secondary) shall hence be placed in locations that are favourable to be reached by walking or cycling (by children) on safe routes. Access routes to existing schools must be retrofit to provide for safe walking and cycling.

Sustainable mobility plans for schools – as for any major trip attractor – must become compulsory. **Target figures for children walking or cycling to school** must be defined and met. The Green Schools programme has an important role here, which must be secured and expanded.

In order to promote active travel to school, **school places shall be allocated** in a way that all children can attend the school closest to their home.

If Ireland wants to be open to incoming skilled workforce, more alternatives to denominational schools must be offered, otherwise this leads to excessively long school runs.

Basic **road traffic education including cycle training** must be incorporated into the curricula of all primary and secondary schools and must become the norm, rather than an exception where it is up to chance whether or not a pupil will leave primary school with any form of formal roadside behaviour education or not (also compare “public transport education”). Appropriate structures and funding must be made available.

If the next generation gets familiarised to sustainable travel patterns through teaching and practice, children are likely to keep these patterns in their later life. So, investments in this area have an immediate benefit now, but are also an essential investment into the future.

### Public Transport (PT)

Public Transport – meaning all buses, trains, trams, but also ferries, water taxis, ride-pooling, taxis, bike-sharing, car-sharing etc. in the broader sense) must become the backbone of mobility in our metropolitan areas and beyond. Innovative approaches and adoption of best practice from abroad must be supported and demanded in a new SMP.

Uptake of public transport – especially in and around the regional town and cities – must rise to dimensions above the present levels.

Despite numerous improvements in recent years, acceptance of public transport severely suffers from its poor reliability especially in peak hours, when people are most dependent on reliable services.



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Buses get stuck in traffic and struggle their way through congested city streets. It is of no benefit that a route with a scheduled 15min frequency experiences gaps of 30+ mins and then buses arrive in bulk.

In order to become the backbone of daily travel, buses and PT in general must be given absolute priority over private car traffic in inner city areas through bus lanes, priority signalling or other means of traffic management.

**PT must be accessible for all.** While most buses, including provincial buses, are accessible for passengers with reduced mobility, the adaptation of bus stops needs to catch up. Severe gaps in the network of accessible bus stops must be closed in a timely manner.

**Fares must be attractive** and an as low as possible access barrier to use PT also occasionally. Having an annual ticket must be a no-brainer for city residents (see Vienna: €365 for an all covering annual PT ticket). The fare structure e.g. in Cork is archaic (no transfers allowed within the same bus network on a single ticket). Innovative approaches shall be facilitated through fiscal measures: Rented apartments in inner city complexes could include a season ticket. Concert or sports tickets shall include PT travel. Enrolment at colleges shall include free PT use, including bike-sharing. Annual Leap-Cards shall give discounted access to car-sharing or cargo-bikes.

A **change in culture** and attitude towards PT is needed. Buses in particular must get rid of the negative **image of subsidised, tax payers' money sucking public services**. Fiscal support by the government is an indicator of how much PT is valued as a service to the public and society as a whole. Fiscal support for PT in Ireland is much lower than in other European countries. Benefits to society, local economy and environment (climate) must be factored into public perception. In contrast, wide spread subsidies for motor traffic are never made a topic in public debate, and there is rarely full awareness of the true cost of cars for the user and for society.

**PT must be presented to school** children in suitable ways ("how to use the bus" -day), as many children (60% driven to school by car) don't know anything about how to get from A to B by PT. It simply doesn't occur in their lives (see also "schools"). Acquiring "Mobility Literacy" must be essential for young people.

## Multi-modal travel chains

**Transfers** between bus routes, between train and bus, bike and train, car and bus, train and ride pooling minibus etc. **must be recognised as the norm and facilitated accordingly** (facilities, fare structure, information, ...). A PT offer where getting on the bus and getting off the same bus at the destination is the norm, is a model of the past.

Intermodal information (e.g. RTPI) must be provided and easily accessible across all modes and operators. Passengers on an arriving train e.g. must be shown their bus connections in real time.

Public transport in Ireland still suffers from single mode (silo) thinking. PT operators offer trips from stop to stop (station to station) with their own network, while people need to get from door to door. This results in an obvious gap between demand (mobility) and offer (bus trip). In order to realise a substantial shift from car travel, **PT must address the last-mile(s) issue**.

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**The combination of Bicycle + Bus / Train** offers a high degree of flexibility. Long distances are covered by bus or train, while the last mile(s) are covered swiftly by bike. Carrying bicycle of trains and key bus services must be facilitated in reliable ways.

A new SMP must clearly identify, outline and facilitate raising the potential of **expanding PT catchment areas by connecting to cycle** traffic for the last mile(s), i.e. secure bike access routes to and parking at PT stops and nodes.

### Mobility as a Service (MaaS)

Public transport shall be regarded in the broadest sense, and include most travel modes between active travel (walking and using a private bike) and the single occupancy private car. This must include all forms of car-sharing, public bike-sharing, taxi, ride-pooling, water taxis, LocalLink, community buses, maybe even car pooling.

All these services must be integrated to the highest possible degree and be accessible in tailor made packages as Mobility Services. In urban areas, and beyond, integrated mobility services must eventually be able to replace the private car to the furthest possible extend, for all walks of daily lives, day or night, seven days a week. There needs to be a transition from mode specific transport operators to all-round mobility providers.

### Car Pooling

Car pooling schemes must be incentivised and enhanced in any shape or form (taxation, regulation, insurance, etc.). It has huge potential and ample spare capacity (free seats in cars) and requires minimal built infrastructure (dedicated parking, park+pool sites at the edge of metropolitan areas). Modern ICT solutions can offer unlimited possibilities for real-time matching of drivers and passengers, while issues relating to GDPR can often be an obstacle (e.g. within companies) and need to be addressed effectively.

## Implementation, Delivery and Funding

Change in the urban environment, and “transport and mobility” play a major role in this, is often driven by communities and cities. In Ireland however, local authorities (LA) don’t have the funding and fiscal autonomy to effectively drive change and redesign their cities and streets in a way that would induce real *change*. For almost every single project, be it a cycle lane or introduction of residential slow-zones, funding and approval must be applied for from the government. LA’s need to be far more independent to introduce changes to their streets at their own discretion.

Means of active travel (walking / cycling) are travel modes in their own right and must be acknowledged as such. Hence **dedicated budgets for cycling and walking** in cities (LA) and nationwide (government) must be established. So far, e.g. cycling infrastructure is often a side product of road



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improvement schemes or programmes like BusConnects., which does not acknowledge the significance of improvements for active travel.

**Funding for (voluntary) civil society groups** dealing with active travel on the ground shall be considered, as such groups do tremendous work on the ground and often cannot even afford a part-time coordinator.

To better understand institutional and regulatory structures that prevent or slow down changes to present and unsustainable mobility patterns, **funding** should be made available for **demo-projects and research** on structural changes in e.g. to travel / commuting policies in large companies, public sector employers or other organisations.

In order to plan and progress the significant changes, projects and innovations in the mobility sector, the establishment of **NTA offices in the regional cities** (e.g. Cork) we consider as imperative in order to deliver the numerous projects for sustainable travel infrastructure. Planning and funding with a very Dublin-centred view cannot be the answer to the need for urgent delivery of the ambitious plans that are set out in the relevant planning documents (CMATS, RSES etc.).

For the amount of work that is needed in the years ahead to deliver tangible improvements to our towns' and cities' streets to improve active travel (and other projects), **planning capacities and resources** are needed on both national and local levels. Sufficient staffing **and expertise** in relation to innovative solutions / best practice examples for sustainable travel are required to deliver substantial results in modal shift.

**Active Travel officers in cities and counties** are needed to coordinate and push swift and concerted improvements to achieve a significant shift towards sustainable and healthy modes in local travel.

As a lesson learned from previous policy programmes, a strong focus must be put **on ridged monitoring of implementation and delivery** of projects and policy changes. Target figures for modal shift along the policy's timeline must be defined and results reviewed on a regular basis with e.g. bi-annual assessments and progress reports.

An independent **assessment panel** (compare e.g. Committee on Climate Change in the UK) shall be established to monitor progress and highlight deficits where they occur.

With the pressing urgency of substantial changes to our mobility, in order to maintain accessibility locally and respond to climate change globally, Ireland cannot afford to lose any more time to introduce significant changes to the way we organise our transport and mobility system.

## Conclusion

As daily travel patterns are a result of spatial structure, planning, fiscal structures, taxation, regulatory frameworks with spatial effects, labour regulations, school policies, social commitments and many more factors, with effects on transport, health, the environment, climate etc., a broad cross-governmental approach is needed to formulate a concise and future proof SMP.



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We trust that this will be reflected in the widest possible sense in the formulation of the new Policy and trust that our observations will be considered to a large extent in the formulation of Ireland's Sustainable Mobility Policy for the next decade.

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

\*A list of organisations participating in the TMF can be found on the Forum's website.