



Transport & Mobility Forum

Cork City Council
Air Quality Strategy,
Environment Department
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Via online consultation portal

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Public Consultation - Response
Cork City Council
Draft Air Quality Strategy 2021–2026

A Chara,

The Transport and Mobility Forum, Cork (TMF) is a representative group of organisations that 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 Transport and Mobility Forum recognises that transport bears significant responsibility for poor air quality globally, nationally and in Cork City, and that transport users and providers must take responsibility for the very significant damage caused to health by this poor air quality.

We recognise that air quality is both an ongoing chronic problem and also an acute problem during episodes of certain weather conditions. To tackle the contribution of transport to the problem of Air Pollution, there are a number of mitigation measures that can incentivise the move from polluting and unsafe means of transport to less polluting safer means of transport.



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These include:

1;

Firstly, ensuring that all planning, policy and enforcement is informed by and follows the hierarchy of the street and its user groups:

1. Vulnerable Pedestrians
2. Pedestrians
3. Cyclists and Self-Propelled Vehicles
4. Public Transport
5. Private Rented Transport
6. Local business Delivery
7. Local Motor Traffic
8. Non-Local/Strategic Motor Traffic

This closely follows the contribution of each transport mode to air pollution with the exception that electric vehicles rather than public vehicles per se are less polluting.

2;

The best and most effective way to reduce transport emissions and pollution is to reduce the need to take unnecessarily long journeys to access school, work, services and entertainment by planning dense walkable urban neighbourhoods rather than low-density car-dependent suburbs. To ensure this a 5/10-minute city where accommodation, work, education, services and entertainment all be available within a 5 or 10-minute walk should be the objective of all urban planning.

Policies that help meet this goal include limiting the availability of parking, charging for parking, minimum density requirements, minimum floor space to site area ratio requirements, road pricing to reflect the social cost of driving as well as the cost of pollution. a citywide 30km/h speed limit and insuring good urban permeability for pedestrians and cyclists.

3;

Pedestrian prioritisation by ensuring that streets offer a pleasant pedestrian environment, including by ensuring with a citywide 30km/h speed limit and that space is not taken from pedestrians for parking or traffic lane but rather treats the streets as a social space, as well as by delivering a permeable urban environment for pedestrians. This requires a permeability audit of the city and a follow up on the problem identified.

4;

A cycle-friendly City supported by a 30km/h speed limit, cycle permeability, low traffic zones and neighbourhoods, two-way bike access to one-way streets, and suitably protected active travel infrastructure where necessary. Special consideration needs to be given to bike parking particularly in high-density residential areas in the city centre where residents have difficulty parking their bikes at their homes. Where on-street car parking is provided a significant proportion of this should be replaced by protected bike parking for residents with ideally a secure covered bike parking place available to every resident within 50m of their house.

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5;

A HGV ban within the inner ring of the City as recommended by the Cork Metropolitan Area Transport Strategy, supported by “last-mile” delivery and cargo bike delivery hub or hubs for commercial deliveries.

6;

Consideration should be given to a cargo bike rental or a try out scheme to allow businesses or householders particularly those with families to try my swapping the family car for a cargo bike. (Compare e.g. “Cargo-bike Library” scheme in Edinburgh)

7;

On-street electric car and bike charging points for residents in areas which rely on on-street car parking. At present, a large proportion of residents in the central City live in rented housing or do not have dedicated on-site parking spaces. This may prevent them from switching from ICE to electric cars. While recognising that electric cars are not zero emissions and do produce particulates from breaking etc and do have the same congestion and hostile urban realm problem as other types of cars, the fact that they produce at least 90% less pollution and are far less noisy does have the capacity to reduce the impact of those cars that remain on the Urban environment, particularly on air quality.

8;

The implementation of objective 3.3 of the Cork Metropolitan Area Transport Strategy to allow better in connection within public transport, ideally including bike-share and future micro-mobility options along with bus and train.

9;

The rapid transition of public transport, public service and public utility vehicles, including the council fleet, to zero-emission vehicles.

10;

A core element of promoting walking (and cycling, i.e., active travel) in urban settings is the permeability of the urban fabric for pedestrians, to provide shortcuts and avoid – in many cases – lengthy detours for getting to local services, schools and bus stops. Permeability, particularly pedestrian permeability, is absolutely vital to enabling active travel and public transport use in suburban contexts. A city-wide detailed permeability audit (perhaps delivered in a phased manner if necessary) is vital to identify the remediations which will be necessary to ensure it is possible for the entire population of the city to be able to walk or cycle safely and directly to all nearby destinations. This needs to be followed up by significant funding to allow the retrofitting of permeability into existing suburban areas in particular, as well as ensuring there is a strong emphasis on achieving excellent permeability within and importantly between all new developments.

11;

Road pricing to limit the level of traffic in polluted areas to a safe level should be considered, along with similar limits and charges on parking.



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12;

More effective enforcement of existing and new regulations.

Recognition of the danger of acute pollution episodes.

The above measures are capable of making steady and sustained progress in reducing chronic air pollution and its resulting health and death toll.

However, acute episodic incidents of high air pollution present a real and present danger to the health of the general population and 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, as is recommended at above level 4, before asking those who are causing the problem to modify their behaviour. We recognise that it is unacceptable to ask victims to modify their behaviours before asking polluters to do so. We recognise that there needs to be consideration given to closing roads to motorised traffic when pollution levels rise to levels where 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.

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

Do Chara,

Dr. Darren McAdam-O'Connell

Transport and Mobility Forum - Chair

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/>