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Sustainable Mobility Policy Review
Department of Transport, Tourism and Sport,
Leeson Lane,
Dublin 2
D02 TR60

17 December 2019

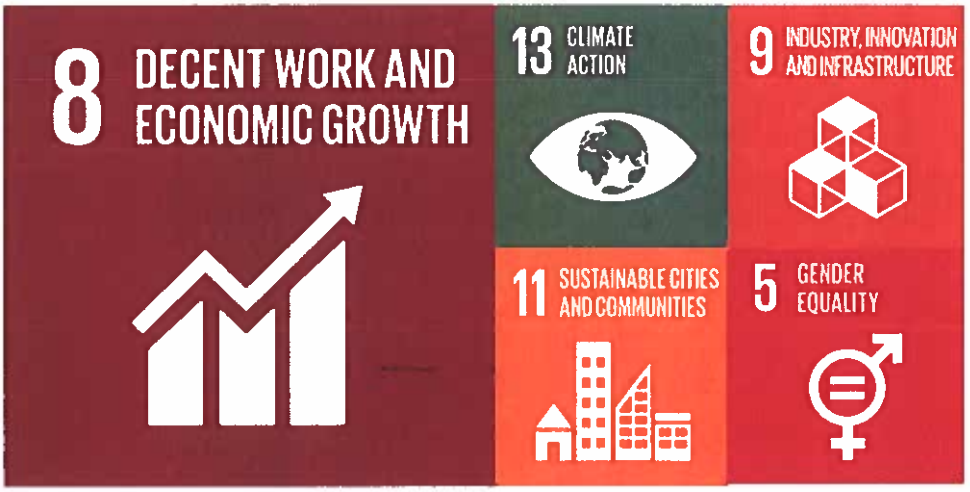
Re: Submission on Congestion (Sustainable Mobility Policy Review)

To Whom It Concerns,

Cork Chamber is the leading business organisation in Cork, proactively working to identify and progress developments that are facilitative of economic and sustainable growth. Representing an employer base of close to 1,200 businesses and over 100,000 employees across the region, Cork Chamber is the largest business representation organisation in the South of Ireland.

We welcome this opportunity to submit our views on Ireland's growing issue of urban congestion, which has a negative impact on the economy, the environment, and quality of life, as part of the Sustainable Mobility Policy Review.

This submission has been guided by our commitment to delivery on the UN Sustainable Development Goals. Five specific goals have been identified by the Irish Chamber Network which we are actively advocating for throughout our work;

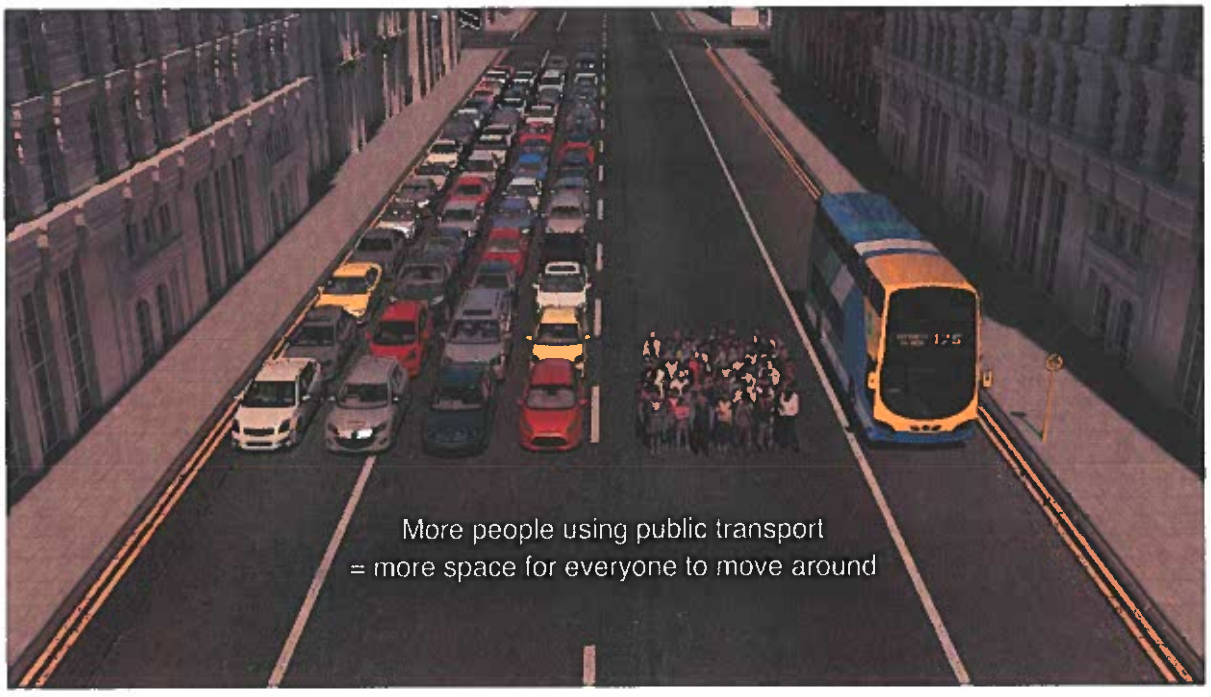


As set out in Project Ireland 2040, Irish cities will continue to grow, attracting more people and more jobs. With this growth comes additional travel demands. As Ireland's second city, Cork has already experienced significant growth in the number of people accessing our city centre for employment.

Between Census 2011 and 2016, the workforce in Cork city and suburbs increased by 11% to 102,000 people. The urban workforce has accelerated in size since. From 2015 onwards, South Mall has seen massive regeneration through the opening of new offices and flexible workspaces. Further down the river, in Cork's Docklands, new state-of-the-art office buildings have been developed and now house companies who were previously located in out-of-town business parks as well as companies new to Ireland.

At the time of writing, ten cranes are currently working on projects such as Navigation Square 2, Penrose Dock, HQ and the Beamish and Crawford site. Looking at Cork city alone, more than 1,000,000 square feet of office space is in planning and development for 5,000 extra jobs within the next three years while 1,500 new city hotel rooms are in various stages of progression. By 2030, Cork is targeted for an additional 65,000 jobs under the Regional Spatial and Economic Strategy. In consequence, we have no option but to make more efficient use of our transport networks in order to prevent aggravating congestion even further.

The image below effectively summarises how our cities' transport networks can become more democratic and effective.



As the overarching principle, we support the focus of supply-related interventions to be on investment in sustainable mobility infrastructure, the reallocation of road space to more efficient modes, and further road space investment where required.

In the latter instance, we propose that sustainable modes are integrated into capital projects. For example, that bus corridors be included in the design of the M20 at the point where the

motorway intersects with the city, or that cycling access is considered as part of major road projects such as the Dunkettle Interchange Upgrade.

When enough increases in the supply and capacity of sustainable mobility options have been put in place, we would support a policy move towards demand management measures. However, it is important to note that Cork has some distance yet to have the fundamentals in place for such demand management measures to be effective, or fair.

1. Opportunities and Challenges for Reducing Traffic Congestion in our Cities and Urban Areas

We note the table on page nine which clearly illustrates Cork's growing problems with traffic congestion along the N40 corridor. It should be highlighted that these figures date back to 2016. Based on current commuting times, the frequency of accidents on the N40, and the daily tailbacks to/from the Jack Lynch Tunnel at rush hour, the volume of vehicles travelling along the N40 corridor in 2019 is almost certain to be markedly higher than in 2016.

Other traffic blackspots include Dunkettle Interchange, all access routes into the city centre as shown in the figure on page 12, including Cork Airport Business Park, the N28 Blackpool, the N71, N8 Tivoli Docks and the R641 connecting both CUH and CIT.

74% of all journeys in Ireland are taken by car (p. 25). This statistic mirrors habits in Cork, Ireland's second largest city, where Census 2016 showed that 73% if people living and working in the country opt to commute via car.

As illustrated below, high congestion levels reoccur throughout the working week, in particular during the morning and evening rush-hours, which strongly suggests that commuters are contributing heavily to traffic congestion.

CONGESTION LEVEL BY TIME OF DAY

	Sun	Mon	Tue	Wed	Thu	Fri	Sat
12:00 AM	7%	5%	2%	2%	4%	4%	7%
	4%	1%	0%	1%	1%	1%	3%
02:00 AM	2%	0%	0%	0%	1%	1%	2%
	0%	0%	0%	1%	1%	0%	0%
04:00 AM	0%	0%	0%	0%	0%	0%	0%
	0%	0%	0%	0%	0%	0%	0%
06:00 AM	0%	2%	3%	4%	3%	2%	0%
	0%	43%	47%	48%	45%	34%	2%
08:00 AM	1%	75%	81%	81%	74%	54%	6%
	4%	35%	40%	42%	37%	28%	11%
10:00 AM	8%	21%	24%	26%	25%	25%	17%
	13%	23%	26%	26%	28%	30%	24%
12:00 PM	19%	25%	29%	30%	31%	36%	29%
	22%	26%	32%	36%	33%	41%	29%
02:00 PM	22%	28%	31%	34%	33%	43%	26%
	20%	32%	36%	34%	37%	57%	23%
04:00 PM	19%	47%	52%	52%	58%	69%	23%
	19%	63%	73%	74%	78%	54%	23%
06:00 PM	18%	37%	40%	48%	50%	33%	19%
	13%	18%	22%	24%	26%	24%	17%
08:00 PM	11%	13%	15%	16%	19%	19%	14%
	8%	10%	12%	13%	14%	14%	14%
10:00 PM	7%	8%	9%	10%	11%	12%	11%
	8%	5%	6%	6%	7%	11%	11%

Source: TomTom 2018 Cork Traffic Data https://www.tomtom.com/en_gb/traffic-index/cork-traffic

Contrast Cork's high level of car-dependency with the experience in Dublin where 70% of commutes into the city centre is now done using sustainable and public transport. We note the case studies from Dublin, London (page 26) and indeed Cork which show that change can be achieved even at a time of growing economic activity and a growing population base.

Public and sustainable transport networks and infrastructure are fundamental building blocks to successfully decarbonise by 2050. Currently Ireland is drastically lagging our European counterparts in terms of availability of public transport options and sustainable (cycle) network options for commuters. On a positive note, it is possible for Irish cities to grow sustainable and public transport usage when a dependable public transport option is brought online, as has happened with the introduction of high-frequency (every 15 minutes at peak times) of the Ballincollig to Cork City Bus Eireann service. Following its introduction in 2019, this route has seen an increase of 70% in passenger numbers since, resoundingly proving the appetite amongst commuters to opt for public and sustainable options.

We are at a pivotal point in Cork alone with development at a larger scale than ever seen before, now is the opportunity to be laying the foundations for a public and sustainable transport network that works for commuters, and that encourages commuters behaviours and patterns that do not detrimentally add to GHG emissions.

Cork Chamber supports the policy goal of decoupling the growth of private car use from future growth in travel demand and instead drive a major modal shift towards sustainable mobility so that private car use demand falls significantly below current levels. The compactness of Cork City, for example, renders it perfect for growing cycling and e-scooters as commuter options (NB cycling only accounted for 3% of modal share among Cork commuters in Census 2016). However, to achieve a growth in sustainable transport modes, more public space must be allocated towards cyclists/e-scooters and bus corridors instead of cars. Cork needs delivery of a safe and connected network for sustainable transport – something which is currently lacking.

We finally wish to highlight the role that effective spatial planning and ensuring the viability of high-density construction can play in reducing traffic congestion and avoiding sprawl. Under Ireland 2040, it is intended that 50% of all future urban population growth will take place in existing brownfield locations. While Cork Chamber fully supports compact-led growth and the delivery of more brownfield accommodation, a lack of viability of apartment construction is currently holding back private sector development across Irish cities, thus posing a risk to our future economic and population growth.[1] Until this viability gap is bridged, Ireland will not deliver on the planning objectives of Ireland 2040, as we will continue to witness suburban sprawl and a widening of the commuter zone. In this context, we note the Banking and Payments Federation Ireland Monitor Report [2] from Q3 2019, which showed an increasing drift of first-time buyers to the Dublin commuter belt of Meath, Louth, Kildare and Wicklow (41% of all first timer buyer purchases so far in 2019), despite this trend being in direct conflict with the objectives of Ireland 2040.

[1] EY-DKM, 2019, Viability and Affordability of Apartment Building in Cork City, https://www.corkchamber.ie/wp-content/uploads/2019/09/Viability-and-Affordability-of-Apartment-Building-in-Cork-City.pdf

[2] https://www.rte.ie/news/business/2019/1205/1097132-more-first-time-buyers-moving-to-dublin-commuter-belt/

Suggestions:

- By 2040 commuting trips are expected to grow 35% over current levels. Bus Connects must get underway immediately to deliver bus corridors and park and rides for Cork. We are now two years into a 10-year National Development Plan without a kilometre of additional bus lane nor a planning application for a single park and ride.

- In Cork, we have not added cycle infrastructure of note since the depths of the last economic cycle. The Cork Cycle Network Plan must be implemented in full without further delay. As part hereof, we propose the acceleration of quiet ways that can be signposted and promoted as safe cycling routes until such time as new, segregated infrastructure is delivered. In addition, the NTA had committed to extending the Coke Bike scheme with another ten stations in 2019. Regretfully, these stations have yet to be delivered and are as such causing a delay in growing cycling as a commuter option.

- Our transport networks and infrastructure are not fit for purpose having been chronically underinvested in recent decades. This requires urgent attention. The Cork Metropolitan Area Transport Strategy acknowledges the need for a change in policy and capital investment projects to reduce congestion and instead grow other transport modes through investment in Bus Connects, commuter rail, light rail, walking and cycling infrastructure, as well as strategically located Park & Rides.

2. Demand Management Measures, e.g Congestion Charging/Road Pricing

Cork Chamber is aware of the 2017 joint study by Cork City Council, TII and Cork County Council which showed a need for demand management measures on the N40 (page 17). While we agree that demand management measures can be effective tools to manage congestion, we do not believe that this option is appropriate for the N40. Without viable alternatives such as a Northern Ring Road (NRR) or public transport options, traffic would simply be pushed through the city centre if tolls were introduced. A NRR and public transport solutions must come before any demand management measures are put in place.

As for congestion charges such as introduced in Stockholm or London (pp. 41-42), it is not feasible to markedly reduce private car demand unless a substantial increase in public transport investment happens at the same time. Ref page 31 "*demand-focused interventions are unlikely to work if there is no viable alternative for private car users.*" While Dublin is well-served from a LUAS, commuter rail and bus perspective, the reality in Cork that many people have no options but to use their private vehicle – as was reflected in Census 2016. Until adequate and reliable public transport services are in place, it is difficult to foresee how congestion charges could reduce congestion levels across Irish cities, and not merely penalise commuters who have little option but to use their car.

It is important to note the improvement in car technology and fuels in recent years, through innovation in biofuels, renewable fuels and the growth in reliability of electric car technology and range. The innovations across the automotive industry will continue to advance, with technology improvements positively affecting upon air quality and national efforts to achieve reductions in harmful GHG emissions. However, cars take up space, and lead to congestion. We believe the immediate opportunity for Cork lies within public and sustainable transport. The delivery of transport infrastructure is a core priority of Cork Chamber members. In many

respects, alongside the provision of accommodation, public and sustainable transport will be the defining enabler of the future prosperity and quality of life for the people of Cork. In equal measure, failure to deliver will be an acute inhibitor of progress.

Urban access regulations are in place across more than 250 European cities of varying sizes, which are broadly supported by the public and can significantly improve air quality if they are well-designed. In some places, entry depends on vehicle emissions, in others access requires payment or is limited to certain vehicle types. Despite these schemes' successful adaptation across Europe, no low emissions zones exist in Ireland. Cork Chamber is in favour of restricting access of highly polluting vehicles from local neighbourhoods and the city centre. Ireland should join our European neighbours in becoming clean air champions, starting by removing the worst polluting vehicles from our urban cores and gradually move towards zero emissions while also addressing social concerns. As above, it is essential that good and reliable alternatives to using cars are provided across our cities. Equally, support should be given to help small business and local residents transition to compliant vehicles.

Suggestions:

- Demand management measures such as tolling or road charges are unlikely to be effective in reducing congestion until such time as our urban centres has viable and reliable public transport alternatives. Accelerated delivery of designated bus corridors, a safe and segregated cycling network, and increased commuter rail services should be in place before the introduction of any demand management measures.

- Public transport investment should be proactive and should be facilitative linking development with appropriate infrastructure and services. For example, Little Island and Ringaskiddy in Cork are major employment zones in the South of Ireland but have minimal, to no public or sustainable transport investment and funding allocated. This is in no way conducive to a shift in commuting behaviours, and the reduction of harmful emissions, and presents quick wins for policy and investment. Focusing on delivery of infrastructure and services to the key employment hubs across Metropolitan Cork has significant potential to result in a step change in public and sustainable transport usage for a large proportion of our commuting population. Other major employment areas such as Cork City centre, Little Island and Blackpool provide ideal opportunities for quick wins.

- We propose that the Department takes steps towards introducing low emissions zones in Irish cities to improve urban air quality, replicating the many successful schemes already adopted across the EU. As part hereof, we highlight the need for supporting citizens and businesses in making a just transition.

- While not directly contributing to reducing congestion, we suggest that the Sustainable Mobility Policy review also considers the introduction of reduced speed limits in the urban environment, to lessen the attractiveness of car usage, as well as to reduce carbon emissions and particular matters.

3. International Best Practice at Addressing Traffic Congestion

Page 39 acknowledges that shopping and e-working will have an impact on transport demand and traffic congestion. While currently some cities are considering specific taxes for

large commercial platforms contributing heavily to traffic congestion through delivery vans, it is likely that drones will be largely responsible for deliveries in the urban environment in the future. We propose that this trend be considered as part of the Sustainable Mobility Policy Review.

The Nottingham example of a workplace parking levy, we feel, is worth exploring (p.45). Although such a levy would contribute to a rise in the cost of doing business, and thus could have negative effects on competitiveness, a parking levy may be acceptable to businesses if designed carefully and if all funds are ring-fenced and invested in local public transport improvements. We encourage the Department of Communications, Climate Action and the Environment to further explore how such a levy could operate across Irish cities. As part of this exercise, we recommend that specific sustainable/public transport projects are identified to be beneficiaries of the funds raised. This, in turn, could help rally support for its introduction.

Finally, we wish to highlight the tendency to design cities and towns around car usage. By its nature, driving a car is not an option for a wide group of citizens, including children under the age of 17, older people, people with disabilities, people on lower incomes, refugees, those who cannot obtain insurance and those without access to parking. Notwithstanding the substantial costs associated with owning a car (money that could be spent elsewhere in the economy), changing how we design our cities to be centred around walking, cycling and public transport instead of cars is a more democratic allocation of the public space, with positive environmental knock-on effects.

Further Points of Note

a. Investment in Sustainable Mobility

We wish to bring to your attention that the following projects are missing from list on page 34 (list of public transport project proposed for cities under NDP):

- A feasibility study for Cork light rail commuter rail investment including additional stations and rail fleet
- Mobility access to Cork Docklands
- High speed rail links between Dublin, Cork and Belfast

b. Car Pooling and Sustainable Transport, Little Island

At Cork Chamber, this summer we took the step of facilitating the National Transport Authority Smarter Travel survey. Armed with the NTA methodology, we walked the length and breadth of Little Island encouraging each business to participate and inform the solutions. The survey is a first step in informing the NTA approach to working with businesses on behavioural change and on infrastructural investment.

Little Island is very obviously one of the key employment areas of the Southern Region, anchoring Cork's reputation and playing a significant role in delivering the Ireland 2040 targets that set Cork out as Ireland's fastest growing city region. It is in a unique position, serviced by a rail corridor that positions it as the central point on a line that links it to major regional towns such as Midleton and Cobh, the City Centre and future employment and residential areas such as Tivoli which will be home to up to 10,000 people as redevelopment gets underway. 10,000 people who could cycle or hop on the train to work.

The results cover many bases. Cycling levels within the Little Island Workplaces Cluster are currently low at 1.5%, with 7.5% of staff occasionally cycling. 93% do not live in walking distance of a bus stop that goes to Little Island. 23.4% of commuters car-pool occasionally, with 35% interested in doing more. 32% of staff expressed interest in a bike fleet to be located at the train station for the use of Little Island employees only, facilitating commuting options to and from the train station. 66% do not need their car during the day and 72% do not have drop offs or school runs en-route to work.

Suggestions:

- Delivery of Dunkettle Interchange without further delay.
- Delivery of the Glanmire Greenway, Carrigtwohill-Little Island cycleway and cycling access to Tivoli to improve cycling access of Little Island.
- Introduction of a direct bus route between Cork City Centre and Little Island, and the addition of stops on the N25.
- Enhanced pedestrian crossings and safety on Little Island, including better access between Little Island train station and East Gate Business and Retail Park
- Improved frequency through the day and at peak times on the Midleton-Cork rail line.

c. Air Quality

There is an opportunity to adopt technologies within our transport fleet to greatly enhance and safeguard air quality arising from traffic congestion. In the case of Cork, with over 20% of the Cork Metropolitan area yet to be developed by 2040, now is the opportunity to have a step change in public transport technology and fuel. The future will require a mixture of technologies and fuel types. Cork Chamber believes that immediate and ambitious action must be taken to meaningfully cut emissions now. In a recent study carried out by Cork City Council and the Centre for Research into Atmospheric Chemistry at UCC, air quality in Cork city is currently one of the worst in Europe recorded by real-time air quality monitoring website PurpleAir, with sensors measuring the level of particulate matter in the air. The Environmental Protection Agency confirmed that data from one of its air quality monitoring stations in the city rated the air quality as "poor" at approximately the same date and time, further verifying the PurpleAir findings.

Suggestions:

- Cork to become test region for net zero biogas bus fleet. Cork Chamber advocates for the immediate adoption of a biomethane public bus fleet for Cork. Biomethane is a low-carbon, methane-based transport fuel produced from anaerobic digestion giving effect to national waste policy, driving towards an efficient circular economy in converting waste to energy, while increasing domestic energy security, diversity and resilience.

Yours Sincerely,

Sarah Thatt-Foley
Senior Public Affairs Executive