

CORK CYCLING CAMPAIGN

Response to Public Consultation



member of



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Response to Public Consultation on the Draft

Cork Metropolitan Area Transport Strategy (CMATS) June 2019

Dear Sir or Madam,

The Cork Cycling Campaign is a voluntary group promoting utility and recreational cycling in Cork City and County. Founded in 1999, the Campaign advocates for improved conditions for Cork's cyclists and strives for recognition and promotion of cycling as a serious form of transport. Everyday cycling is of inestimable benefit to mobility in Cork: it is rapid and efficient, it contributes to a better urban environment, it improves the health its users, and improves quality of life for all. As a sustainable mode of travel, cycling has a central role

to play in mitigating climate change by helping society transition to low energy mobility. Cork Cycling Campaign has been the voice of people cycling in Cork for 20 years; we have over 350 members and over 4,000 followers on social media, and engage regularly with the media on transport questions. The Campaign is part of Cyclist.ie, the Irish Cycling Advocacy Network, and the European Cyclists' Federation (ECF). We are a key stakeholder in discussions on transport strategy for the region.

This submission is a more detailed follow-up to our preliminary response of 28th June 2019. Due to the heavy work load that many of the cycling campaign groups around Ireland were facing in relation to last week's concurrent VeloCity conference in Dublin and BikeWeek events, we appreciate the NTA's permission (Owen Shinkwin) to accept more detailed representations from our side with a few days delay.

General Comments

Cork Cycling Campaign broadly supports and welcomes the CMATS plan.

We particularly commend the switch in emphasis away from catering to private motorised transport. Car-dependence is without question the central cause of mobility problems in the Cork metropolitan area. In this regard we welcome a much stronger focus on public transport along with active mobility (walking / cycling).

However, we are **deeply concerned that active travel plays second fiddle to public transport** in CMATS. Buses, commuter rail and light rail services, even when functioning well, will not be the best mode choice for all trips and all people. Public transport also has large ongoing operational costs and delivers far less public health benefits for the individual person, compared to walking and cycling. The **projected future modal share for cycling (4% in 2040) we consider as incontrovertibly flawed** (see *Modelled Modal Share* further down).

In general, CMATS displays little awareness of national and international trends in mobility. This is astonishing given that it purports to be a long-term mobility strategy. In particular, there is little awareness or emphasis on the following:

- 1) Changing technology trends, particularly electric bikes and e-scooters. Such technologies can make a huge difference in the range and topography tackled by their users. In particular, electric bikes now mean that that distance and topography are much smaller issues for cycling.
- 2) The role of congestion charging and city centre traffic exclusion zones is barely mentioned, even though these are a key part of promoting active and sustainable travel in general, and reducing vehicle air pollutant emissions within legal limits in such population centres.
- 3) The widespread adoption of low speed limits as the default option in many jurisdictions and local authorities, including in the UK and much of Dublin.

There is **little serious engagement between CMATS & the National Mitigation Plan**, besides providing more sustainable options for mobility. Projections will fall very far short of likely climate targets (e.g., zero emissions by 2050, as other nations are proposing). CMATS will do little to halving total carbon emissions by 2030, as the IPCC suggests is needed to avoid catastrophic climate change consequences. Much more ambition is needed here, and concrete steps must be taken not only to improve the attractiveness of active and sustainable transport and to make private vehicle use less attractive. Walking and cycling should be strongly prioritised in the early stage of delivery as having the lowest cost and the greatest potential impact in the short term (see *Quick Wins* below).

We would like to take the opportunity to make more detailed comments on some aspects relating to cycling in the CMATS document.

Quick wins

We believe that the opportunities for a significant modal shift towards more sustainable travel which can be achieved by walking and especially cycling are underestimated and underemphasised within CMATS. Small and relatively inexpensive targeted interventions favouring active travel may hold the potential of considerable results within a short time frame and should be prioritised within the first 5 years of the strategy's lifespan.

We call for a full walking and cycling audit of Cork city involving all stakeholders in the first year of the Strategy. Given the much higher benefit to cost ratios of walking and cycling measures compared to other interventions, the relatively modest nature of such projects, the supporting role they play for public transport adoption and usage, and the urgency of driving modal shift to active and sustainable transport as quickly as possible, we call for the earliest possible delivery of these measures. An audit will help identify and prioritise these measures.

Permeability of the urban and suburban street space offers strong gains in connectivity and improves the attractiveness for walking and cycling. Filtered permeability can offer new shortcuts while keeping undesirable motor traffic away from these routes. It is also a huge boon to neighbourhoods, as seen in the Healthy Streets programme in London. While in CMATS permeability is mentioned as a key component for all new development areas within the CMA, very little is said about a retrofit of the existing city fabric. Where e.g. neighbouring housing estates are separated by cul-de-sacs, walls and fences, the retro-fit of filtered short cuts and can open up new paths and shorter routes for active travel. Where required, funds should also be made available for land acquisition (single properties or parts thereof) to facilitate such new paths.

Protective measures (orcas, wands, bollards) should be recommended and implemented across key routes in the city, in line with persistent calls by cycling groups. Failure to protect cycle lanes from car parking is critical to promote

increased cycle usage and to reduce traffic volumes. **We call for a specific measure to protect key city cycle lanes in the earliest years of the Strategy.**

Lower speeds for motor traffic can significantly contribute to a safer and more pleasant environment for cycling and walking, especially for vulnerable age groups (children, elderly). A speed limit of 30km/h should become the default for all residential areas, as well as for roads with significant cycle traffic on shared roadways, high volumes of pedestrians and limited footpath space, around schools and in the city centre. Road design features shall support lower speeds and facilitate the concept of “legible streets” (e.g. change in road surface, alternative street cross section, “shared spaces”, alternating parking arrangements, more trees and bushes in the street space, etc.). This aspect is underrepresented in the CMATS document and shall be outlined stronger.

Cycling must be acknowledged as a genuine mode of transport, with a number of small interventions. Cycle traffic must be fully recognised by statutory road signage (e.g. existing signs “no right-turn” into a one-way street, despite the fact that it has a contra-flow cycle lane). The relation between motor traffic and cyclists on cycle lanes and paths, esp. at junctions, is very blurry in the Rules of the Road and needs clarification.

Adequate junction design would be a key factor to the safety and convenience of cycling. Today, junction signalling often disfavours cycling and walking to the benefit of maximised capacity for free-flow motor traffic. At junctions, cycle paths and lanes must be continuous through the junctions, while today they often end before and cyclists must enter into pedestrian space. At complex junctions, especially where features of cycling infrastructure change, cyclists will benefit from guidance by specific signage.

The **definition of quiet routes** for walking and cycling is essential for accommodating wider target demographics (children, women, cycling novices, elderly etc). Cyclists are not a homogeneous group. The diversity in physical fitness, confidence and experience will determine the choice of routes far more than for car drivers. *One size (cycle lane) fits all* solutions will risk leaving out a large part of potential users. Many people would prefer quieter, more pleasant routes away from main thoroughfares, even if the route is a bit longer. Permeability (retrofit), lower speed limits (see above) and re-design of key junctions or crossings can highly facilitate the set-up of such quiet routes.

Contra-flow cycling facilities in one-way streets should be set-up at a far larger scale. Where 2-way motor traffic cannot (space) or shall not (traffic management) be facilitated, there is often space enough to allow for contra-flow cycling (depending on local conditions). Extended slow zones can be supportive in this regard. Other countries are far more advanced in this field. The opening of one-way streets for cyclists can have a huge benefit for the network and connectivity available to active travel (see Quiet Routes above).

Signposting and advertising of **cross-city cycle routes** (e.g. Kent Stn to CIT) will give cyclists information on recommended routes from A to B, which are

visible in the street space. As cyclists will often choose different routes than motor traffic, can use dedicated short-cuts or seek to avoid steep gradients, separate sign posting for cycle traffic is needed. This aspect is hardly recognised in CMATS or CCNP and can be realised almost immediately.

While the above list is not exhaustive or complete, it shows some key aspects of how cycling (and walking) can be better facilitated without large and cost intensive building projects. Civil works and necessary capital spending would often be at a minimal scale, while the potential of raising latent demand for (safe) cycling cannot be underestimated. Concerted efforts in this direction – we believe – will result in quick wins for a modal shift within only a few years (not to mention the positive effects on public health) and **we urge that such measures shall be front-loaded and high-lighted in the CMATS strategy and be realised within the first 5 years.**

Potential target demographics for cycling

In our view the plans for cycling laid out in CMATS are based on a very restricted perspective of today's cyclist demographics (the predominantly *male, aged 20-40* group). Large local employers like e.g. UCC show that already today the staff members cycling (13% modal share in 2019) go far beyond this bracket. Various surveys suggest that there is a significant latent demand for cycling, as many respondents say that to them, road conditions are not safe enough today for cycling.

The rapid proliferation of electric bikes will further increase travel distance considered acceptable for cycling and largely reduce the detrimental effects of a hilly topography. E-bikes will further open cycling to age groups that will not consider cycling today, as anecdotal evidence shows.

We are convinced that given the suggested improvements in cycling infrastructure proposed in CMATS and further listed here will significantly widen the target demographics that will consider cycling for their daily transport (teenagers, women, elderly, ...) and will open cycling for many more people than today. **This needs to be reflected in the CMATS document.**

Cycle Parking

The CMATS document calls for increased bike parking in key city locations, city centre and public transport nodes. We strongly support this. More emphasis, however, must be put on various types of bicycle parking, targeting different user groups:

While shoppers can avail of traditional open bike racks, employees e.g. in the city centre need covered and secure (locked) parking facilities, as their bikes will be parked for the entire working day. Collective parking facilities will be needed here as many businesses occupy premises with very limited on-site space.

Same type bicycle parking is needed in public transport nodes, such as Kent station and the bus station, to provide secure overnight parking for in-coming commuters at the tail end of their multi-modal commute. **As both aspects are not explicitly mentioned in the CMATS document, we urge that these would be added in the final document.**

Carriage of bicycles on trains and buses

The combination / integration of cycling and public transport has proven to provide an enormous degree of flexibility. By expanding catchment areas of public transport by accessing stations and stops by bike and covering the “last mile(s)” after the PT travel by bicycle can open public transport to a far wider target audience. Covering the longer part of the journey by train, tram or bus in return makes cycling more attractive, even for longer commutes, or in case of bad weather. Nonetheless, there is very little mention on the carriage of bicycles on public transport. Carrying bicycles on suburban and regional trains – also in peak times – has become the norm in many European countries. **We urge that the reliable option of carrying bicycles on public transport** (at any time on trains, on light rail and selected bus routes with restrictions) **shall be included in CMATS.**

City Logistics / Last Mile Deliveries

While in CMATS there is a chapter on freight traffic, there is no mention of the role that (electric) cargo bikes can play in moving towards a more sustainable way of deliveries, particularly in city and town centres. While the access of HGVs to the city (centre) shall be restricted, delivery vans e.g. for the ever-growing business of online shopping are also clogging narrow city centre streets. Pilot projects for a cargo bike based “Last Mile delivery” are running in several European cities. For the occasional private user, e.g. DIY markets offer cargo bikes for rent to their customers. **CMATS should also make provisions for this future trend, e.g. by reflecting cargo bikes in the dimensioning of cycle paths.**

Features of Cycling Infrastructure

In terms of cycle traffic, the CMATS document largely refers to the Cork Cycle Network Plan (CCNP 2017). In both documents, there is very little mention of the design characteristics for the proposed primary and secondary cycle network routes. In order to provide a coherent and safe cycling infrastructure for a far wider target demographic than today’s (“creating the 8-80 city”, meaning also catering for the young and the old), a high proportion of the cycle network shall consist of segregated and protected cycle paths, particularly in streets with speed limits higher than 30km/h. Experiences from e.g. Copenhagen, and feedback from travel surveys in Cork suggest that segregated paths are the key to attract a far wider target audience to cycling.

Where streets with shared road use are part of a cycle route, “cycling” stencils on the roadway shall indicate to both cyclists and drivers that the roadway is for shared use.

We urge that CMATS strengthens the case for the installation of segregated cycle paths where possible, and that this should be the default standard for all new roads.

Other comments & requests:

CYCLING & WALKING

- We strongly recommend adding "active travel" to "sustainable travel" in Principle 2 – otherwise it would be inconsistent and conflating different travel modes with different requirements, costs, and benefits.
- There is almost no mention of enforcement and driving culture, though this is a key problem for vulnerable road users. This includes people with mobility impairments and is a problem raised repeatedly over many years by cycling groups in the city (esp. close passing and parking in cycle lanes). We ask for CMATS to specifically mention bollards, orcas, and other low-cost measures to prevent such behaviour and to protect the public investment in cycling infrastructure
- We request full economic costing (incl. health impacts, congestion, air quality) to be considered for all transport interventions in line with the WHO Health and Economic Assessment Tool, available online.¹ We note that the low overall benefit cost ratio of ± 2.5 for the overall CMATS is barely a third of that of walking and cycling interventions which are estimated as being about 6.3 : 1 in the UK.² We ask that CMATS specifically note these benefits and recommend the earliest possible delivery of measures advancing walking and cycling.
- We strongly endorse the CMATS recognition of the importance of permeability for walking and cycling, including provision of infrastructure like pedestrian/cyclist crossings, bike rails, etc. (also see *Quick Wins* above)
- We strongly support prioritising the development of a safe waterfront pathway (p.40)
- We note that CMATS identifies potential future conflict between pedestrians and cyclists with much higher usage rates. We believe this is correct. High quality design is important, and segregation is best practice for shared walking and cycling routes with highly traffic volume. We therefore request an explicit note to this effect in CMATS. Our observations are that behaviour change signage (walk on left, ring bell)

¹ <https://www.heatwalkingcycling.org/#homepage>

² Davis, A. (2014) Claiming the health dividend: A summary of and discussion of value for money estimates from studies of investment in walking and cycling. Department for Transport (UK)

is entirely ineffectual in the city where it is in place (Ballincollig Regional Park, etc.). Much clearer physical segregation is necessary.

- We note the hierarchy of development places walking & cycling at the bottom and is inconsistent with its emphasis elsewhere in report. We call for a revision of this hierarchy with higher prioritisation of cycling & walking
- The use of shared bus/cycle lanes is highly undesirable from the viewpoint of encouraging cycling and is a highly intimidating infrastructure for many cyclists, especially the elderly and children cyclists. We request that bus/cycle lanes be stipulated as an undesirable solution for promoting active transport and be explicitly labelled as a solution of last resort.
- We strongly support the development of the Lee-to-Sea Greenway and call for its implementation in the early years of the Strategy. The L2S would function as a central spine making cycle commuting an attractive alternative to private vehicle use, as providing a scaffold from which the rest of the cycle network can be developed with integrity.
- We call for a city-wide policy of fast change intersections, toucan intersections and intentional reprogramming of ALL isolated crossing timings. Unnecessarily delaying modes that should be supported becomes an impediment to their adoption.
- We recommend that Lower John St (p48) be identified as a key N-S corridor for cycling and walking
- There is no mention of cycle counters, but these provide key evidence on cycling modal share and demand. We recommend that cycle counters be included at several locations around the city.
- Strategy does not address greenways and leisure space transit corridors and access through parks, though this is a key issue where a park is part of transport infrastructure

OTHER MODES / TOPICS

- We support a reduction of on-street parking in the city centre (p10) as a keen tool to drive modal share towards active and sustainable modes
- CMATS does not seriously consider the efficiency of private vehicle use, though this is arguably the crux of the problem with average vehicle occupancy at <30%. High occupancy vehicle lanes or routes through town should be mentioned in the Strategy
- CMATS does not consider potentially very valuable synergies between walking/cycling and public transport. We request the Strategy to emphasise the synergies and mutual supporting roles of cycling/walking and public transport.
- We support the emphasising of quality urban design and Healthy Streets following developments in the UK and elsewhere. We support phased reduction of on-street parking as inefficient use of public space and detrimental to quality of placemaking and urban aesthetics.

- We support increased bus frequencies and additional orbital routes, especially along the N25 / N40 corridor.
- We support bus prioritisation.
- Light rail/bus corridor: We strongly suggest an alternative alignment given active travel, tourism, and recreational importance of the Blackrock railway line Greenway to Mahon, the biodiversity and green artery function of the space, and poor residential access between Pairc ui Chaoimh and Mahon. We reject the assertion that pedestrian / cycling facilities can remain "attractive" when shared with bus / light rail facilities. Noise, pollution, infrastructure clutter, removal of exceptional quality green space would be the consequence. The visualisation on p.70 replaces an extremely beautiful urban green oasis with an horrific concrete drain and a scar through the area.
- The whole field of ferry / water taxi services should be considered in the Strategy
- We support P+R facilities and note that these should deliberately also cater for bike parking to facilitate onward cycling trips.
- We support quick turnover of parking spaces (p77)
- We support smart parking pricing
- We support extending pay parking zones
- We strongly support parking charges at out of town retail locations
- We strongly support workplace parking
- We strongly support the greater emphasis on traffic calming (also see *Quick Wins* above) but note that little mention is made of lower speed limits. We draw particular attention to three serious road accidents in last few months with young children being hit by cars in suburban Cork.
- We raise concerns about *ride on demand* apps and ride hailing. Such systems caused most of increase in traffic in San Francisco according to very recent scientific research.³ We request that CMATS takes note of this study and expresses ride hailing in much more cautious terms as having potential to significantly increase local congestion

Modelled Modal Share

We are extremely critical of the CMATS modelled cycling modal share results with a projected modal share increase from 1% to 4% cycling. These results are completely misaligned with national and international trends, entirely uninformed by national policies on active mobility and targets for cycling, and in stark contrast to existing cycle modal share at large employers in Cork.

Specifically:

1. CMATS ignores the 2016 census results showing a 2.6% existing cycle modal share for commuters in Cork city and suburbs [2016 CSO report on *Commuting in Ireland*]. And as an aside, the selection of 2011 census data seems an odd and unreasonable choice for the model.

³ (Science Advances 08 May 2019: Vol. 5, no. 5, eaau2670, DOI: 10.1126/sciadv.aau2670)

2. CMATS seems ignorant of the most striking feature of that report, namely the enormous increase in cycle modal share, up 43% since 2011. (This is likely the largest single shift in modal share over a 5 year period in the history of the State!) Incredibly, CMATS seems entirely oblivious of this major national transport trend. Cork specifically has seen strong growth in cycling in the last decade.
3. The strong growth in cycling is the major international trend in mobility, with huge increases in numbers cycling in Europe, South America, and North America, in particular. These trends are evidence for the high latent demand for cycling which, when facilitated by quality infrastructure, can increase rapidly and make a positive contribution to urban mobility for all travellers.
4. We believe that much modal shift is now being driven by much greater climate awareness since the last IPCC interim report (October 2018). Increasing awareness of the impact of passive transport on physical inactivity levels, a major cause of serious health effects in populations, is also a driver. We doubt that such social considerations are parameterised in the model.
5. CMATS makes no mention of the government's target of 10% cycle modal share by 2020 (national average). In this context, a modal share for the state's second largest city region of 4% by 2040 clearly contravenes government policy and targets.
6. Cycle modal share among almost 3,000 staff (not students) at University College Cork is now around 13% in 2019 — approximately 300% higher than CMATS envisages is achievable in another two decades.⁴ This is even more remarkable in that UCC provides a strong incentive (fossil fuel subsidy) to drive by providing about **600 free parking spaces for staff, and a further 300 charged at €2/day** — about a third of the going rate in the city. Staff at UCC also hail from all around the metropolitan area, with large numbers commuting from Middleton, Mallow, Carrigaline — distances too far to cycle.

Ignorance of such trends and failure to explore their implications for the CMATS strategy is professionally indefensible.

Therefore, for reasons of non-compliance with government targets and policy, ignorance of modal trends, and evidence strongly indicating that much higher cycle modal share targets are achievable and realistic, we reject the model results. Models that do reproduce reality need to be rejected or revised. Since strong socio-political trends are now driving modal share towards active travel and would be difficult to model, we contend that the most sensible approach is to reject cycle modal share values from the model, and accordingly treat other modal share results with significant caution.

Instead we recommend the following:

- 1) that all cycle modal share values in the report be expunged from CMATS and specifically that such information be expunged from infographics in CMATS.

⁴ Information supplied by Stephan Koch, UCC Community Plan Manager

- 2) That CMATS explicitly points out the difficulties associated with modelling cycle modal share at a time of significant mobility transition, both nationally and internationally.
- 3) That evidence of high cycle modal share at some employers in the city be quoted as demonstrative of what modal share is feasible.
- 4) That qualitative targets to cycle modal share be set at 15% for the near future. The strong latent demand for cycling in the Cork region makes this goal realistic and achievable.
- 5) CMATS should similarly consider setting targets for walking and public transport modal share.

We believe that following the above recommendations would provide enough guidance and clarity for realistic and achievable targets for cycling in the city and remain in accordance with current trends and government targets.

To conclude

In addition to our general support for CMATS, we believe our detailed comments will contribute towards developing a better overall transport strategy for the Cork region. We would be obliged to further contribute to the debate and planning processes in relation to the implementation of CMATS.

Yours sincerely

Adam D'Arcy

Cork Cycling Campaign (Chair)