



# MAYNOOTH CYCLING CAMPAIGN



## **Submission on Public Consultation on the National Investment Framework for Transport in Ireland (NIFTI)**

**MAY 2021**

## Section 1: Background Profile

Are you a (Tick all that apply):

Public Official  
Transport Consultancy Representative  
Construction/ Engineering Sector Representative  
Public Transport Operator (Public)  
Public Transport Operator (Private)

**X Advocacy Organisation Representative**

.Government Department Representative  
Government Agency Representative  
Local Government Representative  
Academic/ Academic Institution Representative  
Student  
Private Citizen  
Other (Please specify)

Other please specify here:

Please state your name and the name of the organisation you represent (if any) in making this submission

**Gerry Dornan,  
Chair,Maynooth Cycling Campaign**

## Section 2: Supporting the Project Ireland 2040 Vision

The National Planning Framework has established a clear direction for the sustainable development of Irish society in the coming decades, as articulated by its ten National Strategic Outcomes. How can transport investment support this vision?

- **The National Planning Framework is a key document in setting out the inter- relationship between how we plan for the future. It is a high level document which sets out the broad view.**

**Transport investment should reflect this broad view. However, it concentrates on the movement of people and goods but only ‘has regard for’ health, environment and climate change. Particularly at local popular level, increased transport investment has focussed on the construction of more roads. This provides a short term fix but only encourages more traffic congestion in the medium and long term. Transport investment must address all the consequences of the choices on where to invest.**

## Section 3: Delivering the National Strategic Outcomes

How can transport investment support the delivery of compact growth in our towns and cities in the coming years?

- **Follow the Dutch/Danish examples rather than UK in relation to the estimated impacts of proposed developments.**
- **Provide healthy streets.**
- **Monitor and report on the impact of ALL Safe Routes to School.**
- **Reduce default speed limits in urban areas.**
- **Increase the taxation rates for all cars.**
- **Provide Park & Ride at the outskirts of towns.**
- **Introduce ‘Nipper Buses’ ie small buses around the larger towns to give an option to people who do not wish or are not able to walk/cycle.**

How can transport investment enhance regional accessibility in the coming years?

- **Need to accelerate the rollout of active travel to regional cities and the larger county towns with ambitious targets to reduce congestion and maintain competitiveness.**
- **Prioritise public transport over road construction.**
- **Provide cycle superhighways as on the continent.**
- **The Development Plans of local authorities should include a planning objective and annual target to reduce the extent of driving using private vehicles.**
- **Better integration of cycle parking and public transport.**
- **Provide higher quality bus stops with shelters, seats and more real time information on services.**
- **Introduce bike carriers on buses**

How can transport investment strengthen rural economies and communities in the coming years?

- **Improved rural roads will increase the speed of traffic and encourage people to travel to shop in larger towns rather than locally.**
- **Provide greenways with adequate width and sealed surfacing to attract commuters as well as recreational cyclists.**

How can transport investment deliver sustainable mobility and encourage modal shift in the coming years?

- **Make Directors of Services in local authorities responsible for effecting and reporting on modal change – at present there is no-one in local authorities responsible for what is a key goal of government.**

- **Recognise that the needs of pedestrians and cyclists are different from one another and stop forcing pedestrians and cyclists to share facilities. This is usually the first choice of Irish local authorities rather than the last.**
- **Change priority of traffic signals to fixed phase esp outside peak travel time rather than traffic actuated controls where phases are determined by traffic volumes.**
- **Introduce modern traffic management which prioritises active travel rather than pay lip service to it. Groningen(NL), Houton (NL), and Ghent (BE) all have traffic management policies which prioritise active traffic in city centres and force cars to take circuitous routes.**
- **Restrict/reduce the availability of free parking for staff as it encourages commuting by private car.**

How can transport investment in surface access support high-quality international connectivity via our ports and airports in the coming years?

- **Ports will need increased investment to cater for Brexit and other challenges in the future so investment should be provided to divert HGV traffic away from residential areas.**

How can transport investment help us to transition to a low carbon and climate resilient society in the coming years?

- **Enable rather than promote alternative options to the use of private cars.**
- **Increased investment in public transport. Encourage the retention of home working rather than a return to pre-Covid-19.**
- **Set up zero emission urban zones and/or low traffic neighbourhoods (LTNs).**
- **Promote the conversion of existing petrol/diesel vehicles to electric vehicles.**
- **Provide Low Traffic Neighbourhoods as in London and/or Block Developments as in Barcelona.**

## 8. Section 4: Transport Investment

What challenges and opportunities exist with regard to decarbonising the transport sector?

- **The big challenge is to reduce the extent of car dependency and give as many people as possible the option of alternative sustainable mode of transport.**
- **Lack of information on annual changes in modal split is a major challenge to the proper management of change.**

- Encourage business to have virtual meetings rather than in person ones.
- Faster introduction of electric buses and trains
- Provide more charging points for electric cars – Norway has an estimated 16,000 charging points – Ireland has a fraction of these but must ensure that the space for them is reallocated from cars not from pedestrians or cyclists.
- Take carbon emissions into consideration when appraising and making decisions on road projects.
- Introduce road pricing as in Sweden and London.
- Provide an independent appeal system on compatibility of local authority schemes with DMURS rather than the local authority acting as judge and jury.
- In the future the extent of flying must be reduced. Short haul flights nationally should be reduced - similar to what the French government is doing.
- Introduce a frequent flyer tax.

What challenges and opportunities exist with regard to protecting and renewing the existing transport network?

What challenges and opportunities exist with regard to improving mobility for people and goods in urban areas?

- Provide high quality cycling infrastructure instead of low quality normally provided by Irish local authorities.
- Restrict the movement of private cars.
- Further restrict vehicles such as HGVs and SUVs which provide an increased threat to vulnerable road users in urban areas.
- Encourage the use of cargo bikes for last mile deliveries.

What challenges and opportunities exist with regard to enhancing regional and rural connectivity, including to our ports and airports?

Do the four NIFTI investment priorities help to deliver the National Strategic Outcomes? Should anything change about them?

- **NIFTI establishes four investment priorities:**
  - **Decarbonisation:**
  - **Protection and Renewal:**
  - **Mobility of People and Goods in Urban Areas:**
  - **Enhanced Regional and Rural Connectivity:**

- How local authorities go about implementing them need to change. The *Appraisal Guidelines* refers to four scenarios - Sustainable & Urban Communities, Global Communities, Dispersed Communities and Car focussed Communities but in developing their Transport Strategies, local authorities, which are responsible for planning transport infrastructure, appear to only concentrate on the last scenario - Car Focussed Communities.
- Schemes to reallocate road space from vehicles to active travel in urban areas immediately provoke opposition from motorists. Local authorities need to counter this engaging with communities and promoting the benefits of sustainable & urban communities.
- Where local authorities do engage with communities, it is with a narrow definition of local residents rather than with wider communities.

## Section 5: Further Comments

Do you have any further comments to make on the National Investment Framework for Transport in Ireland?

- The government's target is to reduce carbon emission in transport but any new roads will increase emissions due to induced demand. However, some new roads are unavoidable if we are to continue to grow and prosper as a country. Essential roads must be built but any increase in emissions must be offset by investment in additional sustainable transport schemes which reduce carbon emissions due to change in modal share by the same amount in the local authority area.
- SFILT and SIFLT largely reflected 20<sup>th</sup> century thinking on investment in transport with a roads first policy. The suite of documents did include a paper on climate change but the paper was published before the 2015 Paris Agreement and the 2018 Citizen's Assembly report. The inclusion of updated reports is welcome.
- It is accepted that decarbonisation of transport is essential to meet national targets on climate action but the carbon impact of projects must be an essential part of decision making on project appraisal rather than simply being noted or "taken into account".
- Irish engineers generally use a largely UK database such as TRICs to predict the number of journeys generated by private vehicles. However, the result of Ireland emulating a country with one of the highest car dependency rates in Europe (rather than a country such as the Netherlands with one of the lowest), reinforces the status quo and in Ireland in the last twenty years has contributed to flatlining in the proportion of people cycling nationally.
- TII sets out the calculation of future demand on national roads for the next 30 years in its *Project Appraisal Guidelines for National Roads Unit 5.3 - Travel Demand Projections*. As it specifies a growth rate in future years of between 1% and 3% per annum depending on the county and

assumed growth rate, TII are in theory designing roads on the basis of up to 90% more trips in 2051 than at present. In recent years, the TII has published *National Road Indicators* annually which report the actual growth of traffic on the national road network. Between 2015 and 2019, the actual annual growth of traffic on national roads is even greater than the TII's highest prediction with some regions of the country experiencing rates in excess of 5% per annum. This gives rise to questions about the sustainability and cost benefit analysis of current road plans.

- Phil Goodwin, emeritus professor of transport policy at a number of UK universities, has challenged the cost of carbon used in the cost benefit analysis of new roads and also how the increase of carbon emissions from cars using new roads is minimised by comparison to the percentage of overall carbon emissions. This is in contrast with employment, where additional employment, whether for 10 or 1000 new jobs, is welcomed as a positive thing rather than comparing the increase as a percentage of overall employment levels.
- Neither the Department of Transport nor the Joint Oireachtas Committee on Transport acknowledges in a meaningful way the central role of transport in creating unhealthy communities and the financial burden it imposes on society. If this government is to be successful, the current road projects in the National Development Plan must be reviewed with revised appraisals and realistic models to ensure that future investment is in accordance with current government objectives rather than ones that belong in the past.