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Submitted to **Call for Expert Evidence - Climate Action Plan 2021**
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About you

1 Name

Please provide your name, or the name of the organisation you are representing.:
Transport and Mobility Forum Cork (TMF)

2 Email

Please include a contact email address if you would like to receive a copy of your submission.:
tmfcork@gmail.com

Carbon Pricing and Cross-Cutting Issues

1 What further opportunities exist within our taxation system, beyond measures already implemented and planned, to promote emissions reductions, either on an economy-wide basis, or in specific sectors?

Please provide details in the text box provided:

A whole of government approach is needed to ensure that sustainable activities are encouraged and unsustainable high emissions activities, lifestyles and behavioural and investment choices by individuals, businesses and community groups are not subsidized by the government through the tax system or otherwise. Measures which should be introduced to encourage sustainable investment and behaviour change to reduce carbon emissions should include at a minimum.

Suggestions:
- Car parking should be taxed. A parking levy/tax, on existing workplace and customer parking as well as on new residential parking. Development contributions for car parking spaces should be calculated separately to housing or offices, charged at a much higher rate and passed on to the purchaser of a car parking space, not the totality of people living or working there. This requires that parking would not be built or sold as integral part of a residence.
- Taxing workplace parking as benefit in kind.
- Allowing L.A.s to rate parking separately from other land uses
- Road pricing, particularly in city centres
- Flat, mode blind travel expenses
- Land value tax to replace rates to encourage high density land usage in central areas and penalise the underutilisation of prime real estate. The existing rates system acts to displace investment, employment and general economic activity from dense urban cores where firms are faced with high commercial rate bills to out of town office and retail parks where the rates burden is negligible. This results in Prime Centre City office and retail accommodation lying vacant while out of town office and retail parks are built. This is both economically wasteful and contrary to our requirement to plan for compact urban growth to reduce our emissions. A land value tax which would be paid in full on vacant, derelict, and unoccupied sites but which could be rebated for high occupancy would incentivise the utilisation of these high-value assets in prime locations. The state should further incentivise business investment and employment in dense urban cores and disincentivize remote inaccessible car-dependent locations by requiring local authorities discount land value tax assessment in proportion the number of people employed, housed (residential above retail) or serviced in high-throughput locations and requiring a surcharge on inappropriate/unsustainable developments such as low density uses or car parking in Central City locations and office or retail development in remote car centric Green field sites.
- While the basis for assessing Motor Tax for cars has been aligned with their CO_2 emissions since 2008, the motor taxation of vehicles other than cars is based upon unladen weight. There is, however, scope to change the motor tax system for HGVs to a dual approach based upon weight and emissions, using Diesel Euro VI as the required emissions standard with the expectation of further accelerating the move to alternative transport technologies.

Care must be taken when seeking to encourage investment and behavioural change to lower emissions and promote more sustainable choices that market-based instruments are not the only tool. Regulation can be more effective and faster at influencing behaviour. They have the advantage of being more precise, predictable, and exact in ensuring desired outcomes. Market based instruments such as carbon pricing and those outlined above play a role in providing a price signal to stimulate innovation and funding transition. But the wealthy must not be allowed to pay to pollute indefinitely. Where sustainable behaviour becomes associated with poverty and unsustainable behaviour with wealth behaviour change becomes far more difficult to achieve.

2 What supporting policies might be required to offset the impact of any taxation changes on low income households or those most at risk from fuel poverty?

Please provide details in the text box provided:

A fraction of Carbon Tax revenue should be dispersed to either the whole population or targeted to low-income groups.
It is vital that when carbon tax and other environmental taxes and levies are introduced that the costs incurred by the average household is provided to the least well off in society to ensure they do not suffer. Given that the wealthy consume and pollute at a far higher rate and while energy costs are a higher proportion of the income of the poorest it is a far small absolute spend than for the wealthier this provision is unlikely to amount to a significant proportion of the revenue raised. A sensible approach would be to allocate a fixed increase those on social welfare and other low income vulnerable households to cover the anticipated cost to an average household of the increased cost of bearing carbon taxes or other environmental taxes or levies, while in addition provide a dividend to the entire population along the lines of the Alaska Permanent Fund (APF) dividend which would not only redistribute income and spending power more evenly throughout society but also establish popular support for those taxes and levies when average people would have a financial incentive in their retention and ongoing extension.

3 What further measures might be required in the planning system to realise the objectives of the National Planning Framework in respect of climate action?

Please provide details in the text box provided:

4 What specific additional measures might be required to promote sustainable growth in our urban centres, including to realise the potential of a "15-minute city"?

Please provide details in the text box provided:

A 15-minute city requires that population density of a sufficient level that are enough people within walking distance of a service support those services. At typical Irish suburban densities (2-5,000 people per square kilometre) the only services can possibly be supported are a hairdresser's, a primary school and possibly a take away or corner shop. When so few services are accessible by foot the majority of the population forms the habit of driving to all services and even if they are within walking distance. As so few people are willing to walk even those services will tend not be present within residential areas rather migrating to centres with car parking. However, at densities above 20,000 people per square kilometre, the majority of services can easily be supported by the population within walking distance and when the majority of services are available within walking distance people get out of the habit of driving and even more services can be supported within a community with a virtuous circle emerging.

It appears that below a density of 10,000 people per square kilometre it's impossible to maintain even existing local services and communities will become car-dependent no matter the quality or extent of provision of public or active transport services. Whereas above a density of 20,000 people per square kilometres people will naturally walk even in the absence of any provision for walking.
These figures all assume near perfect permeability such as is found with small blocks. If permeability is interrupted by cul de sacs, walls, roads unsuitable or unwelcoming for walkers etc. these densities would have to be increased pro-rata. Permeability is just as important as density in allowing a 5 or 10-minute walkable community. Given this, communities planned at a density below 20,000 people per square kilometre should be avoided. While existing communities should be assisted in every way possible to attain a density of at least 10,000 people per square kilometre and all existing impediments to permeability removed.
Car parking pushes everything further apart reducing density and increasing the length of all journeys as well as pushing up the cost of building developments. To mitigate this, new developments should be built with minimal parking (set-downs and blue badge parking) and any small amount of parking that is allowed be sold separately. Free parking should be banned by regulation and workplace parking taxed as benefit in kind while this is being phased in. Car parking should be taxed. Development contributions for car parking spaces should be calculated separately to housing or offices, charged at a much higher rate and passed on to the purchaser of a car parking space, not the totality of people living or working there. This requires that parking would not be built or sold as integral part of a residence.
The cost of residents parking should be reviewed to disincentivise car ownership in the city centres. Parking permits disabled drivers should not be affected and limited relief could be provided to those who drive for work or are elderly.
A legacy of poor planning whereby supermarkets have been built on greenfield sites on the periphery of towns are often only accessible by car. The need to drive to get your food shopping is often the main reason people need cars. Investment in public car share programs which would enable people to not buy a car but 'rent' one for such trips as the weekly shop. This sharing economy could allow for developments with less car parking allocation spaces and the introduction of mobility hubs exclusive to that particular development if necessary with greater capacity for public transport linkages in areas not used for car-parking. Existing data already shows that Car sharing users cycle or walk 40% more than those who don't car share so we know that car usage has a role to play and will not completely discourage active travel when facilitated in the right capacity. Existing 'out-of-town' retail outlets should disincentivise the private car in the following ways:
- High quality and frequency public transport links including High quality bus shelters with rain covers, seating and RTPI
- Bike parking at entrance
- Segregated walking and cycling access to entrance
- Mobility Hubs located at large retail outlets such as shopping malls whereby shared mobility solutions (eg Car Share, Bike Share) are available
- Taxi rank at entrance
Central Bank Rules
Present central bank lending rules takes into account only the size of the loan and income while ignoring the financial, time, social and environmental cost of commuting. This has the effect of making commuter housing which is in reality unaffordable after accounting for the cost of long commutes accessible to those seeking finance while preventing those who wish to purchase a property that does not have any commuting cost and so if more affordable despite a higher purchase price from accessing finance. A two-car commute can cost in excess of €25,000 per annum compared to those who can walk or cycle to work. This has the effect of artificially forcing those seeking to buy housing into long commutes and ultimately has a detrimental effect on the planning and development of the nation resulting in increased car dependence. Income should be calculated after the cost of commuting, ideally accounting also for future carbon tax increases and the increased cost of time and childcare etc. This in no way would interfere with the Independence of the Central Bank in setting limits rather it would in fact allow them greater precision in doing so.

Other Measures:
- Road pricing should be put in place to reflect the social cost of driving through the city
- Streets should be regarded as social spaces as the front garden of those who live there rather than as motorways.
- A 30 km/h maximum speed limit shall apply as default in all urban areas.
- A hierarchy of road users (as e.g. defined in DMURS) should be put in place, placing pedestrians at the top followed by cyclists then by public transport with private motorized vehicles considered the last resort and lowest priority at all times.

5 What specific additional measures might be required to promote sustainable growth in rural areas?

Please provide details in the text box provided:

- Rural, digital working hubs to facilitate remote working
- Incentivise living above the shop in rural villages and towns
- Increase investment in rural public transport (e,g, Local Link, but also innovative concepts like community buses) and school buses
- Any new commercial or retail development should be zoned for within the existing footprint of the town or village with minimal parking.

- Peripheral mobility stations/park+ride locations should be set up around towns and villages
- Any new residential development should include active travel and sustainable transport infrastructure and should only be built within a 15 minute walking radius of all trip generators i.e. retail, education, health.
- Services and Infrastructure should be built in parallel to new housing developments to ensure they are connected by public transport and linked to amenities, retail, education, etc by foot and bike.

6 Are there further measures that the Government should take to channel private finance into low-carbon investments in Ireland?

Please provide details in the text box provided:

7 Are any changes required in Ireland's research policy to channel research funding into climate action-related topics?

Please provide details in the text box provided:

All urban areas should undergo a permeability audit to ensure there is direct, convenient, and pleasant walking and cycling connectivity throughout the urban fabric.

8 Is there any additional information you would like to submit in relation to Carbon Pricing and Cross-Cutting Issues?

Please provide details in the text box provided:

Built Environment

1 Can Ireland exceed the target of retrofitting 500,000 homes by 2030? If so, how?

Please provide details in the text box provided:

2 How should Ireland's training and education system scale to meet the skills requirements to achieve this target?

Please provide details in the text box provided:

Regarding innovative layouts and designs of development, specific training, based on latest international best practice in sustainable planning and urban and building design should be systematically disseminated to future architects and designers of buildings (college curricula, CPD, …)

3 Should Government consider bringing forward a phase out of the installation of fossil fuel boilers?

Please provide details in the text box provided:

4 Should further specific changes be made to Ireland's building standards be introduced to support the decarbonisation of Ireland's private and commercial building stock?

Please provide details in the text box provided:

Building regulations, for domestic as well as for commercial developments, must include mandatory provisions for facilitating active travel access and parking (walking and cycling). This applies in particular to the provision of adequate (quality, quantity) provisions for cycle parking.

5 What emerging technologies (e.g. in relation to heating, lighting, and/or building fabric) should be considered for use in Ireland's construction industry to promote further decarbonisation?

Please provide details in the text box provided:

6 What supports can we provide to assist the greater use of low-carbon building materials? How much consideration should be given to embodied carbon in construction materials?

Please provide details in the text box provided:

The embodied carbon of road construction is of particular concern and should be factored into the planning and sustainability assessment of road projects.

7 Are there specific technologies that should now be prohibited?

Please provide details in the text box provided:

8 What trade-offs between decarbonisation and air quality may need to be further considered in policy design?

Please provide details in the text box provided:

9 Are there specific household behaviour changes that should be considered? Should such changes be mandated by way of regulatory changes?

Please provide details in the text box provided:

10 What specific further measures should be considered to promote decarbonisation of Ireland's existing commercial buildings?

Please provide details in the text box provided:

11 Is there scope to further develop and deploy district heating opportunities in Ireland?

Please provide details in the text box provided:

12 What specific approaches should be taken to accelerate decarbonisation of Ireland's public sector building stock?

Please provide details in the text box provided:

See Q 14 for details

13 What other opportunities exist to support the decarbonisation of the Ireland's building sector?

Please provide details in the text box provided:

14 Are there further specific measures and policies, including through planning and building regulations, that might improve the resilience of our building stock to climate change?

Please provide details in the text box provided:

Planning and building regulations should consider the effect that the location and nature of developments have on the travel requirements and the lifestyle of occupants, residents, workers or service users. The number one priority should be a reduction in the distance required to make everyday journeys by reducing the distance between the trip generators home, work, school, shops, recreation, following the concept of the 10-Minute-Town or Neighbourhood. This will at minimum result in a very significant reduction in the distance driven but the real objective is to ensure the longest regular daily or weekly journey falls into the range of an easy walking and cycling distance, so car ownership and use will naturally atrophy.
Any development (new and ongoing retrofit) must cater for active travel access as it does for car access and parking today. This means appropriate (quality, quantity, accessibility) parking/storage facilities for bicycles (including a limited number for odd sizes like e.g. cargo bikes) must be provided, as a mandatory requirement in building regulations. People will only use a bicycle on a regular basis if they have a safe and appropriate place for it at their home. The same must apply for employee or customer parking in commercial developments.
How do we achieve this?
There should be a priority on high-density infill and brownfield housing and commercial development being built rather than low-density out of town car-dependent developments which are impossible to viably being served by public transport or active travel (cycling, walking).
The space required for car parking pushes everything further apart reducing density and increasing the length of all journeys as well as pushing up the cost of building developments. To mitigate this, new developments should be built with limited parking or no car parking at all and any small amount of parking that is allowed be sold separately to the dwelling unit. Supermarkets and other large retail facilities should be required to charge the full commercial cost or more for parking so that customers who walk, cycle or take the bus do not subsidise car driving customers. Free parking should be banned by regulation and workplace parking taxed as benefit in kind while this is being phased in.
Car parking should be taxed. Development contributions for car parking spaces should be calculated separately to housing or offices, charged at a higher rate and passed on to the purchaser of a car parking space, not the totality of people living or working there. This requires that parking would not be built or sold as an integral part of a residence. Fees for residential parking permits for public street space must include a significant element of cost for the use of public space, instead of being a nominal administration fee only.
Streets should be regarded as social spaces as the front garden of those who live there rather than as motorways, primarily serving car traffic (moving or stationary).

Permeability of all urban areas for pedestrians and cyclists should be ensured, both in new developments and existing areas, so that cycling and walking as active modes can enjoy the shortest possible routes.
Density minimums should be put in place to ensure housing is built where it is needed, and urban sprawl is prevented. These densities must be far higher than in the existing urban context in Ireland today, e.g. in the regions of 50,000 people/km2 in city centre locations (e.g. Cork docklands etc.), and around 10-20,000 for most other urban and suburban areas.

Minimum floor space to site area ratios should be introduced to ensure there is space as well as density and a grey space maximums put in place to reduce the space taken up by road, car parking etc.

Transport

1 What further policy measures might be required to enable Ireland to meet the CAP 2019 target of 936,000 electric vehicles on the road by 2030?

Please provide details in the text box provided:

As a general comment on electric vehicles, we note that the de-carbonisation of road transport, i.e. replacing combustion engines by electric vehicles only addresses the symptom of high energy use in transport (the energy source not necessarily being fossil anymore), not the root. The root for high energy consumption in daily travel are the ever-increasing travel distances as a result of spatial structure and employment patterns. Whether or not a car is electric or petrol powered, its spatial effect on the ease of travel (i.e. covering of distance) resulting in urban sprawl etc will not change, nor will their take-up of urban space for parking and requirements for road space (with a detrimental effect on active travel options and public transport). But as emissions must be regarded in absolute figures, it is the distances travelled by private cars that need to be drastically reduced, and this must be supported by a radical change in spatial structure and planning. Extra electric-powered vehicle on the road will still result in extra emissions, they emit dangerous particles and perpetuate car dependency

and designing our streets for cars. We need to shift the focus to reducing private vehicle use by between 20 and 60% by 2030. This will require a radical, rapid and multi-faceted change in how we live. See below for more suggestions on how to reduce car dependency in Ireland.
Rather than targeting a minimum number of electric vehicles on the road, the target should be the maximum number of internal combustion vehicles remaining on the road.
In terms of vehicle targets, the priority should be reducing the number of internal combustion vehicles to zero as soon as possible and the fewer EVs required to do that the better. The emphasis should urgently move from subsidising electric vehicles to penalising the purchase of new internal combustion vehicles. A national roadmap for phasing out the internal combustion engine needs to be communicated widely to all members of society so that the public refrain from purchasing new diesel or petrol engine cars. The main driver of this reduction should be regulation the sale of petrol and diesel cars. The sale and import of new petrol and diesel cars should be phased out as soon as possible. Given, that the main barrier to the adoption of electric vehicles is their purchase price despite lower running costs this makes it difficult for those on low income lacking capital to replace the existing petrol or diesel car with an EV. Therefore, policy should focus on the purchase of new cars whereby incentives strongly favour small EVs. The size of cars has increased significantly in recent years which is not only negative in terms of higher emissions but larger cars are not suited to the size of our streets and car parking spaces and take up more space in the public realm. Incentives should reflect this. There also needs to increased public awareness campaigns promoting the benefits of smaller electric cars. This phasing must be long-term, but with a clear trajectory known to all market parties.

2 Is there scope to increase this target for 2030? What should the new target be?

Please provide details in the text box provided:

The target should be for a target in the reduction in the number of new internal combustion vehicles being brought onto road i.e. first time registrations. That target should be a 50% reduction in new petrol or diesel power vehicles bought by 2025 and 100% reduction i.e. zero new ICVs by 2030. There should be a parallel target of a 20% reduction in all private cars on the road by 2030.

3 What specific measures might be required in the commercial transport sector to encourage a change to EVs or other zero carbon alternatives?

Please provide details in the text box provided:

The development of long distance/heavy rail freight transport should be investigated and worked towards. This would include a network of rail distribution centres in major cities. Decisions such as the moving of the port from Tivoli Docks to Ringaskiddy in Cork which is not connected to rail, should not be made in the future. Ports such as Foynes in Limerick should be developed to spread out the entry points of trucks and reduce the distances to destinations and connected by rail to a rail distribution centre in Limerick city. Tax incentives and tariffs should be used to increase the costs of goods with a higher carbon footprint and reduce the cost of locally sourced goods.
In urban areas, depots should be set up on the periphery of cities, towns and villages where freight is transferred from HGVs to facilitate ‘last mile’ deliveries being done by small EVs or e-cargo bikes. HGVs should not be discouraged from entering our cities, towns and villages and only allowed to deliver goods in urban areas during the day if necessary. Cargo bike libraries should be funded for all cities and large towns.

In order to create a supportive environment to decarbonise HGVs, a policy and regulatory roadmap is required. This should accelerate the take-up of alternative transport technologies that are capable of meeting climate action objectives. Policy measures such as reduced excise duty for natural gas and biomethane as a transport fuel would address the price disparity between CNG/Bio-CNG and conventional fuels. This is a key factor in accelerating the take-up of Bio-CNG. An extension of the excise duty treatment beyond 2022 would provide the required certainty to CNG users to facilitate vehicle purchase decision cycles. The lifespan of HGVs is generally eight years and therefore, if fleet operators or hauliers are purchasing CNG vehicles in 2021 they may only be able to avail of the current excise duty for one year, thereby, acting as a disincentive to the switch to CNG/Bio-CNG. A policy roadmap that outlines the policy supports available up to 2030 would provide HGV owners and infrastructure providers with certainty. This would help to facilitate the rollout of refuelling infrastructure and timely vehicle purchase decision cycles. A target date of 2030 corresponds with the timeline set in the “National Policy Framework – Alternative Fuels Infrastructure for Transport in Ireland” to ensure that Ireland has the required level of recharging and refuelling infrastructure to support the uptake of alternative fuels usage, including CNG/Bio-CNG, by 2030. There is also a need for regulatory bodies to provide a supportive, safe and well-regulated environment for refuelling systems to ensure that the refuelling requirements of the growing number of alternatively fuelled vehicles are met in a timely manner.

The national HGV fleet is ageing with vehicles 10 years or older now accounting for 45 per cent of all HGVs. This represents a particular opportunity to accelerate the take-up of alternative transport technologies. The replacement of HGVs at the end of their service with cleaner alternatives could have a significant impact on reducing freight emissions. If this transition to lower emissions vehicles does not occur, there is a considerable risk of ‘locking-in’ a large cohort of HGVs to diesel for the next decade. A scrappage scheme could be introduced as part of the next low emission vehicle grant scheme to cover the scrappage of diesel HGVs and support their conversion to low emission vehicles such as Bio-CNG or hydrogen fuelled HGVs. A scrappage scheme for older diesel HGVs would result in a significant reduction in transport emissions and contribute to an improvement in air quality if they switched to CNG vehicles as part of the scheme.

While the basis for assessing Motor Tax for cars has been aligned with their CO2 emissions since 2008, the motor taxation of vehicles other than cars is based upon unladen weight. There is, however, scope to change the motor tax system for HGVs to a dual approach based upon weight and emissions, using Diesel Euro VI as the required emissions standard with the expectation of further accelerating the move to alternative transport technologies.

4 What additional measures should be considered to promote greater use of public transport or active mobility options?

Please provide details in the text box provided:

Q4 & 5 need to be considered in tandem
The number one priority should be a reduction in the distance required to make every day journeys i.e. reducing the need to travel. All government policies should aim to enable people to live near where they work, go to education, shops, recreation, etc. Our objective should be to ensure the longest regular daily or weekly journey falls into the walkable or cycleable range and if longer distances are unavoidable, they should be undertaken by public transport. Multi modal options should be strengthened and spatial planning should concentrate development in Public Transport accessible corridors.
How do we achieve this?

First high-density infill and brownfield housing and commercial development should be built rather than low-density out of town car-dependent developments which are impossible to reach by public or active transport. This housing needs to be built near areas of employment, education, retail, recreation. Land use and Transport Planning must work together to both retrofit and develop 15 minute neighbourhoods. Density minimums should be put in place to ensure housing is built where it's needed and sprawl is prevented, AIM FOR- at least 50,000 people/km2 in the city centre docklands etc. 20,000 (MINIMUM) for most suburban areas and an absolute minimum of 10,000/km2 for all urban areas. Below 10k you will get car-dependent sprawl. Minimum floor space to site area ratios should be introduced to ensure there is space as well as density and a grey space maximums put in place to reduce road, parking and wasted space. Much like private developers are obliged to build a crèche in each residential development, they should also be obliged to build high quality outdoor play space and pubic parks equipped with seating as well as highly permeable developments connected to popular destinations via active and sustainable transport options. This should together result in all urban areas becoming a 5/10-minute city where accommodation, work, education, services and entertainment all be available within a 5 or 10-minute walk.

Providing car parking is expensive to build and imposes a very substantial ongoing public service cost to the local authority. Allowing car parking to be included as part of new developments has historically directly or indirectly passed on the cost of parking to all live, work or use those developments rather than to those who park there. The cost of providing a single car parking space in an urban context is the same as the cost of providing a bed space and takes approximately the same amount of land, resident who do not drive should not have to directly or indirectly pay for car parking being built as part of residential projects, those who do drive would benefit from being able to transparently see the real cost of parking and have the option to choose to continue to incur those costs or not.

Given this, not only should strict limits be placed on the maximum amount of parking allowed in any new development, it must be a strict condition of planning at any car parking provided cannot be free to use or included with the sale or rent of residential, office or retail space. All car parking must be sold separately. Historically where car parking was provided particularly in apartment blocks the vast majority of this parking was not used by residents but the cost of its being built and maintained was included directly or indirectly in the purchase price or the rent that the residence paid for the apartment. The only way to prevent this is to insist that all parking provided must be sold separately to any accommodation or office space.

Similarly, development contributions for car parking spaces must be calculated separately to rest of the development and apportioned so that their cost is passed on to the purchaser of a car parking space not the purchaser of any apartments office space or retail units which may be built as part of the development. Given the undesirable nature of parking and its relative cost compared to building accommodation the development levies for each car parking space should be very considerably in excess of what is charged for each apartment or each office space.

Likewise, the cost of on street residents parking permits should reflect the fact that a car parking space uses as much space and costs as much as a bed space. When residents parking permit costs significantly less than the going rate for the rent of a 1-bedroom apartment in an area, it means the cost of parking is being subsidized. It's not reasonable to expect everyone to suddenly be able to pay such a high price but neither is such a huge subsidy sustainable permanently. However, to protect elderly and infirm existing residents consideration should be given to a lower rate on-street parking permit for residents who through age and infirmity may not qualify as a disabled driver but who do have significant mobility impairment. Parking permits disabled drivers should of course continue to be highly subsidised or free.

Road pricing eg London Congestion Charging Zone, should be put in place to reflect the social cost of driving through the city.

A hierarchy of road users should be put in place, placing pedestrians at the top followed by cyclists then by public transport with private motorized vehicles considered the last resort and lowest priority at all times. This is outlined in the Design Manual for Urban Roads and Streets (DMURS). Streets should be regarded as social spaces whereby the hierarchy of users outlined in DMURS is applied. The public realm should be considered primarily a space for people not cars with space for people to linger, play, socialise. Public seating, toilets, green space and play opportunities should be of higher importance than car infrastructure. The public realm should be designed to slow down any cars that travel in urban areas, thereby facilitating a 30 km/h maximum speed limit. Permeability of all urban areas for pedestrians and cyclists should be ensured, both in new developments and existing areas.

Transport funding should be reapportioned to ensure that public and active travel received least two thirds of all transport funding.

The subsidy or a collective funding approach (i.e. tax payer or similar) for public transport should be significantly increased to ensure a reliable frequent 24/7 public transport system is available to as large a proportion of the population as possible. The Tax Saver Scheme needs to be made mandatory post haste as many employers do not facilitate this for their employees. Consideration should be given making public transport free for all, or least students and those on social welfare, the cost of providing free public transport would be substantially a substantially less than the net cost to the exchequer present cost of those same journeys being made by electric private passenger car. Look to good practice e.g. @semester-Ticket@ for students (Germany), 'Versement Transport' (employer levy for public transport funding, France)] Road space should be allocated to buses to ensure that congestion does not compromise reliability, increase journey times or lower capacity of PT. An integrated national ticketing system along the lines of the leap card should be extended cover all public transport, bike share schemes or other forms of Mobility as a Service (MaaS).

All roads in urban areas (incl. towns and villages) other than limited access national routes such as motorways should be considered primarily as pedestrian, cyclist, and public transport routes first with private motor vehicles as the last priority in conformity to the well accepted hierarchy of provision principle (compare DMURS). This should ensure all housing, schools retail areas etc are on an interconnected pedestrian, cyclist, and public transport network. This should include separated cycle lanes on any road where significant motor traffic is to remain. On other routes they may not require separated cycle lands where speed limits are no more than 30km/h and they are designed so that motor vehicles are treated as "guests" yielding to pedestrian and cyclist in all instances. There should also be an interconnected national network of Greenways, not only for recreational, but also for active travel commuting purposes. To ensure the interconnectivity of this network initial funding priority should be given to connecting to this national network and second connecting major urban centres to this network and their rural hinterlands before purely local or disconnected Greenways are considered.

All transport infrastructure should be designed for all ages and abilities, adopting a 'Universal Design' approach. Before designs are put out for public consultation, there needs to be a robust and meaningful pre-consultation phase whereby a 'Community Co-Design' model is applied.

Further considerations:

· Provide separate, physically segregated footpaths between cycling and walking. Cyclists and walkers do not mix well, and paint is not infrastructure.

· Provide more zebra crossings to prioritize walking and introduce new regulations to reduce the waiting time to a maximum of 30 seconds for pedestrian signal times to ensure that pedestrians of all ages have adequate time to cross the road

· Create a 'safe routes to school' programme to make it safer for children to make their own way to school and implement school clean air zones that will restrict car access. This will help to embed a culture of walking and active travel among children from early on.

· Expand the Green-Schools Programme, the environmental and awards initiative that promotes sustainable travel, to all schools in the state

· Accelerate the development of walking greenway routes in rural areas for commuters between towns and villages but also to boost tourism

· Create large traffic-free areas in urban areas

Cycling:

· Revise and implement the 2009 National Cycle Policy Framework
· Construct 20,000km of cycling paths in the form of an expansive network of segregated cycling paths in urban areas and cycling greenways across the country by 2030 to facilitate leisure, tourism and commuting needs
· Ensure that all future and existing cycling paths are physically segregated from roads and pedestrian paths, sign posted, maintained to a high standard and well lit
· Provide safe cycling routes to all primary and secondary schools and third level colleges. Carry out an audit of every school/routes leading to the school from residential areas
· Expand the Green-Schools Programme, the environmental and awards initiative that promotes sustainable travel, to all schools in the state
· Implement the cycle bus initiative, which has been working with and adopted by several local country councils, nationwide. A cycle bus is a system whereby a group of parents and schoolchildren cycle to school together, the children on the inside, the parents forming a barrier all around them, protecting them from vehicles on the road.
· Carry out a national road audit to identify the most dangerous junctions and roads for cyclists. Accordingly, retrofit all dangerous junctions and roads to the standards set out in the National Transport Authority's National Cycle Manual and the Department of Transport's 'Design Manual for Urban Roads and Streets' at a minimum
· Ensure that all road upgrades and new roads include provision for cycling built with Dutch style cycling infrastructure
· Ensure all new roundabouts are built to the Dutch-style roundabout design while retrofitting existing roundabouts

· Provide safe, secure and well-lit bicycle parking in towns and cities; DART, train, and bus stations; and all park and ride facilities
· Introduce bike transport facilities on all Irish Rail trains
· Promote cycling using ''soft interventions'' such as public awareness campaigns, bike week and information targeting certain users
· Ensure that cycle safety becomes a core part of the driving test, particularly for HGV and LPSV drivers
· Allow contra-flow cycling in one-way streets on specifically signed roads with low volumes of traffic
· Expand the bike to work scheme to €2,000 in order to increase the purchase of high quality e-bikes
Rural cycling vision:
- Create an environment in our cities, towns, villages and rural roads where CYCLISTS ARE EXPECTED AND RESPECTED. This would mean for example that provision of bike parking becomes mandatory at all public buildings, for example post offices, libraries etc and that provision of bike parking at workplaces and commercial premises becomes the norm.
- Create and map a network of useful, CONNECTED CYCLE ROUTES throughout Local Authority Areas LAs must be instructed to think Networks, not isolated segments of routes. This priority is allied to the overall integration of Transport and Planning, to the concept of the 10 minute town and the viability of rural villages. Identify L-roads in rural areas that could be designated 'Active Travel' routes to enable people to walk and cycle safely in a rural setting.
- Implement BEST PRACTICE DESIGN to ensure routes are safe and comfortable for cyclists of all ages and abilities. National oversight of design, otherwise what we sometimes get is unusable and will not contribute to reducing emissions.
- Prioritise SAFE CYCLE ROUTES TO SCHOOLS and car free zones at school gates. Increase funding available for routes to school - the school run is one of the prime causes of short car trips. The €15 M allocated this year is welcome, but it will cover just over 100 schools. There are 4,000 primary and post primary schools in Ireland.
- LOWER SPEED LIMITS to make our roads and streets safer and more accessible for everyone, and to reduce casualties. Lower speed limits in built up and in rural areas will promote active travel which in turn will lead to a reduction in emissions. It is not feasible to expect people to walk and cycle on rural roads with a speed limit of 80 km/h. It is absolutely essential to introduce a default 30 km limit in built up areas and around schools as per the Stockholm Convention.
- Ensure clear and timely ACCESS TO FUNDING, by improving capacity at all levels of local and national government. Active Travel Teams within LAs to expand - we need to ensure they are multi-disciplinary. The programme announced in January is welcome but many counties are only getting an allocation of 2 extra staff which is not enough to form a team. Consideration should be given to combining resources to form larger teams to serve smaller counties.

- COLLABORATE WITH ALL STAKEHOLDERS - including cycling and community groups - at all stages of planning and design. Adopt and promote the CRAC tool (or a version of CRAC) as a national tool to be used as part of the design process by both designers/engineers and people participating in the process
- Create a common language and common understanding of good quality design and provide a simple way for people to meaningfully input.
- Provide CYCLE TRAINING for all ages, especially children. Expand Cycle training budget and number of Cycle Right trainers. Currently only one class (usually 5th) can apply but training needs to start earlier to build the cycling habit and reduce cars/emissions on the school run. A whole school approach to cycle training should be adopted. Transport emissions reduction cannot happen if only one child in a family receives training and siblings still have to be driven to the same school.

Public transport:
· Conduct an expansive Urban Area Bus Survey and carry out more research into rural public transport needs
· Ensure all new buses are 100% electric or run off bio-methane or hydrogen
· Establish more Park and Ride facilities and Bike and Ride facilities to maximise connectivity between and within different modes of transport
· Implement the BusConnects projects, in conjunction with communities to optimise layout
· Increase funding for Local Link services and School Buses. Expand rural bus links to improve public transport connections between (and within) rural towns and villages. Fewer than 10 of the 82 largest towns (over 5,000 inhabitants) have public bus services in their areas
· Focus on reducing train journey times and increasing frequency on all inter-city rail routes to better compete with car journeys
· Progress the full electrification of the rail network and upgrading/expanding the current network
· Progress the appraisal, planning and design of the Luas extension into other areas of the greater Dublin area (e.g. Bray, Lucan, etc)
· Support the development of a light rail system for Cork and Galway cities and devise new urban rail plans for Limerick and Waterford cities
· Ban all vehicles with diesel engines from every major urban city centre by 2025 and extend the ban to all petrol vehicles by 2030
· Implement a daily congestion charge on all private vehicles entering Cork city centre and other major urban centres.

5 What specific policies might be required to reduce overall passenger kilometres driven within the private car fleet?

Please provide details in the text box provided:

Q4 & 5 need to be considered in tandem

The number one priority should be a reduction in the distance required to make every day journeys i.e. reducing the need to travel. All government policies should aim to enable people to live near where they work, go to education, shops, recreation, etc. Our objective should be to ensure the longest regular daily or weekly journey falls into the walkable or cycleable range and if longer distances are unavoidable, they should be undertaken by public transport. Multi modal options should be strengthened and spatial planning should concentrate development in Public Transport accessible corridors.

How do we achieve this?

First high-density infill and brownfield housing and commercial development should be built rather than low-density out of town car-dependent developments which are impossible to reach by public or active transport. This housing needs to be built near areas of employment, education, retail, recreation. Land use and Transport Planning must work together to both retrofit and develop 15 minute neighbourhoods. Density minimums should be put in place to ensure housing is built where it's needed and sprawl is prevented, AIM FOR- at least 50,000 people/km2 in the city centre docklands etc. 20,000 (MINIMUM) for most suburban areas and an absolute minimum of 10,000/km2 for all urban areas. Below 10k you will get car-dependent sprawl. Minimum floor space to site area ratios should be introduced to ensure there is space as well as density and a grey space maximums put in place to reduce road, parking and wasted space. Much like private developers are obliged to build a crèche in each residential development, they should also be obliged to build high quality outdoor play space and pubic parks equipped with seating as well as highly permeable developments connected to popular destinations via active and sustainable transport options. This should together result in all urban areas becoming a 5/10-minute city where accommodation, work, education, services and entertainment all be available within a 5 or 10-minute walk.

Providing car parking is expensive to build and imposes a very substantial ongoing public service cost to the local authority. Allowing car parking to be included as part of new developments has historically directly or indirectly passed on the cost of parking to all live, work or use those developments rather than to those who park there. The cost of providing a single car parking space in an urban context is the same as the cost of providing a bed space and takes approximately the same amount of land, resident who do not drive should not have to directly or indirectly pay for car parking being built as part of residential projects, those who do drive would benefit from being able to transparently see the real cost of parking and have the option to choose to continue to incur those costs or not.

Given this, not only should strict limits be placed on the maximum amount of parking allowed in any new development, it must be a strict condition of planning at any car parking provided cannot be free to use or included with the sale or rent of residential, office or retail space. All car parking must be sold separately. Historically where car parking was provided particularly in apartment blocks the vast majority of this parking was not used by residents but the cost of its being built and maintained was included directly or indirectly in the purchase price or the rent that the residence paid for the apartment. The only way to prevent this is to insist that all parking provided must be sold separately to any accommodation or office space.

Similarly, development contributions for car parking spaces must be calculated separately to rest of the development and apportioned so that their cost is passed on to the purchaser of a car parking space not the purchaser of any apartments office space or retail units which may be built as part of the development. Given the undesirable nature of parking and its relative cost compared to building accommodation the development levies for each car parking space should be very considerably in excess of what is charged for each apartment or each office space.

Likewise, the cost of on street residents parking permits should reflect the fact that a car parking space uses as much space and costs as much as a bed space. When residents parking permit costs significantly less than the going rate for the rent of a 1-bedroom apartment in an area, it means the cost of parking is being subsidized. It's not reasonable to expect everyone to suddenly be able to pay such a high price but neither is such a huge subsidy sustainable permanently. However, to protect elderly and infirm existing residents consideration should be given to a lower rate on-street parking permit for residents who through age and infirmity may not qualify as a disabled driver but who do have significant mobility impairment. Parking permits disabled drivers should of course continue to be highly subsidised or free.

Road pricing eg London Congestion Charging Zone, should be put in place to reflect the social cost of driving through the city.

A hierarchy of road users should be put in place, placing pedestrians at the top followed by cyclists then by public transport with private motorized vehicles considered the last resort and lowest priority at all times. This is outlined in the Design Manual for Urban Roads and Streets (DMURS). Streets should be regarded as social spaces whereby the hierarchy of users outlined in DMURS is applied. The public realm should be considered primarily a space for people not cars with space for people to linger, play, socialise. Public seating, toilets, green space and play opportunities should be of higher importance than car infrastructure. The public realm should be designed to slow down any cars that travel in urban areas, thereby facilitating a 30 km/h maximum speed limit. Permeability of all urban areas for pedestrians and cyclists should be ensured, both in new developments and existing areas.

Transport funding should be reapportioned to ensure that public and active travel received least two thirds of all transport funding.

The subsidy or a collective funding approach (i.e. tax payer or similar) for public transport should be significantly increased to ensure a reliable frequent 24/7 public transport system is available to as large a proportion of the population as possible. The Tax Saver Scheme needs to be made mandatory post haste as many employers do not facilitate this for their employees. Consideration should be given making public transport free for all, or least students and those on social welfare, the cost of providing free public transport would be substantially a substantially less than the net cost to the exchequer present cost of those same journeys being made by electric private passenger car. Look to good practice e.g. @semester-Ticket@ for students (Germany), 'Versement Transport' (employer levy for public transport funding, France)] Road space should be allocated to buses to ensure that congestion does not compromise reliability, increase journey times or lower capacity of PT. An integrated national ticketing system along the lines of the leap card should be extended cover all public transport, bike share schemes or other forms of Mobility as a Service (MaaS).

All roads in urban areas (incl. towns and villages) other than limited access national routes such as motorways should be considered primarily as pedestrian, cyclist, and public transport routes first with private motor vehicles as the last priority in conformity to the well accepted hierarchy of provision principle (compare DMURS). This should ensure all housing, schools retail areas etc are on an interconnected pedestrian, cyclist, and public transport network. This should include separated cycle lanes on any road where significant motor traffic is to remain. On other routes they may not require separated cycle lands where speed limits are no more than 30km/h and they are designed so that motor vehicles are treated as "guests" yielding to pedestrian and cyclist in all instances. There should also be an interconnected national network of Greenways, not only for recreational, but also for active travel commuting purposes. To ensure the interconnectivity of this network initial funding priority should be given to connecting to this national network and second connecting major urban centres to this network and their rural hinterlands before purely local or disconnected Greenways are considered.

All transport infrastructure should be designed for all ages and abilities, adopting a 'Universal Design' approach. Before designs are put out for public consultation, there needs to be a robust and meaningful pre-consultation phase whereby a 'Community Co-Design' model is applied.

Further considerations:

· Provide separate, physically segregated footpaths between cycling and walking. Cyclists and walkers do not mix well, and paint is not infrastructure.

· Provide more zebra crossings to prioritize walking and introduce new regulations to reduce the waiting time to a maximum of 30 seconds for pedestrian signal times to ensure that pedestrians of all ages have adequate time to cross the road

· Create a ‘safe routes to school’ programme to make it safer for children to make their own way to school and implement school clean air zones that will restrict car access. This will help to embed a culture of walking and active travel among children from early on.
· Expand the Green-Schools Programme, the environmental and awards initiative that promotes sustainable travel, to all schools in the state
· Accelerate the development of walking greenway routes in rural areas for commuters between towns and villages but also to boost tourism
· Create large traffic-free areas in urban areas
Cycling:
· Revise and implement the 2009 National Cycle Policy Framework
· Construct 20,000km of cycling paths in the form of an expansive network of segregated cycling paths in urban areas and cycling greenways across the country by 2030 to facilitate leisure, tourism and commuting needs
· Ensure that all future and existing cycling paths are physically segregated from roads and pedestrian paths, sign posted, maintained to a high standard and well lit
· Provide safe cycling routes to all primary and secondary schools and third level colleges. Carry out an audit of every school/routes leading to the school from residential areas
· Expand the Green-Schools Programme, the environmental and awards initiative that promotes sustainable travel, to all schools in the state
· Implement the cycle bus initiative, which has been working with and adopted by several local country councils, nationwide. A cycle bus is a system whereby a group of parents and schoolchildren cycle to school together, the children on the inside, the parents forming a barrier all around them, protecting them from vehicles on the road.
· Carry out a national road audit to identify the most dangerous junctions and roads for cyclists. Accordingly, retrofit all dangerous junctions and roads to the standards set out in the National Transport Authority’s National Cycle Manual and the Department of Transport’s ‘Design Manual for Urban Roads and Streets’ at a minimum
· Ensure that all road upgrades and new roads include provision for cycling built with Dutch style cycling infrastructure
· Ensure all new roundabouts are built to the Dutch-style roundabout design while retrofitting existing roundabouts

· Provide safe, secure and well-lit bicycle parking in towns and cities; DART, train, and bus stations; and all park and ride facilities
· Introduce bike transport facilities on all Irish Rail trains
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· Implement a daily congestion charge on all private vehicles entering Cork city centre and other major urban centres.

6 Is there scope to effect a change in the composition of the private car fleet to shift the vehicle mix away from higher emitting classes?

Please provide details in the text box provided:

High emission vehicles particularly large/heavy private passenger vehicles should be banned or discouraged through tax measures (motor tax, fuel excise duty). Local authorities should also have the power limit access of high emission vehicles to urban areas. An awareness raising campaign should be run to promote smaller, low emission vehicles to help reduce the space demand for cars in urban centres.

7 Is there scope to further increase biofuel blends rates beyond those already planned under the 2019 Climate Action Plan?

Please provide details in the text box provided:

We do not support the general use of bio-diesel and bio-ethanol, to meet emissions targets as the large scale production of biofuels has serious environmental consequences. Biofuel monocultures and production has been shown to result in emissions from change in land use, production inputs, processing and transport of the fuels which are displaced to other jurisdictions. Indigenous biofuel production such as bio-methane from wastewater processing and crop residue for applications such as public transport or agricultural machinery has a part to play.
Ireland has a huge opportunity to benefit from indigenous biomethane production which can be used as a direct substitute for natural gas in CNG vehicles with no technical limitations. According to the European Commission Ireland has the highest potential within the EU for renewable gas production per capita by 2030. The development of an indigenous renewable gas industry and supply chain provides Ireland with a unique opportunity to stimulate the rural economy, enhance farm incomes, and create jobs."

8 Are there any specific obstacles in the planning system preventing greater modal shift?

Please provide details in the text box provided:

Planning regulations which limit density and therefore spread further apart housing, workplaces, schools, services and recreational destination encourage car dependency as do parking requirements. Provision of parking, wide driving lanes, wide turning radius and roadside buffers or verges increases the cost of development and lowers the density of communities well as having a chilling effect on pedestrian comfort and perception of safety. However, it is important to note, it depends on the road type be it residential access or a higher trafficked roads: verges should be there to INCREASE pedestrian and cyclist safety and comfort
Increasing the compactness, permeability and pedestrian attractiveness should be central to the planning process. Planning needs to change from a process which is viewed as primarily preventing excess development and development in the wrong places to process which is focused on ensuring that necessary development get built where it is needed. Mixed use developments catering for single households, older adults, single-parent households as well as the traditional 2.4 families should only be permitted. The planning for any development must be measured against the guiding principles of the 10-minute-town (-city/-neighbourhood) concept.

The school journey generates high levels of congestions throughout urban and rural areas of Ireland. A policy focusing on reducing the need to use the private car on the school journey must be developed and enforced. The Dept of Education should only be allowed build new schools within walking and cycling distance of the core catchment areas. A National enrolment policy should be applied to all schools whereby children who can actively travel to school should be favoured followed by those how can use Public transport. Each school should service a zone to ensure parents send their children to the nearest school. All new schools should not cater for car parking and limited staff carparking should be available to ensure staff do not have to drive to school. Segregations due to sex or denomination are counterproductive in this context. All new schools should not cater for car parking and limited staff carparking should be available to ensure staff do not have to drive to school. The 'school run' has a high impact on the daily "choice" of travel mode (too often, there hardly is no choice for many) for a significant part of the population, and hence will play a key part in promoting a modal shift in daily travel patterns for hundreds of thousands. Opening times for schools and work should be more flexible in order to support parents to walk or cycle with their children to school before they begin their journey to work.

9 Are there specific further measures that should be undertaken to increase the availability of electric vehicle changing points, whether in public areas or on private property?

Please provide details in the text box provided:

We believe there is too much focus on EV's the charging network will naturally develop as EV adoption increases but this should not come at the expense of the public realm, creating a pedestrian hazard or with any exemptions to allow parking or trailing cables which would not otherwise be allowed.

10 What could be done to make the public sector transport fleets more climate friendly?

Please provide details in the text box provided:

While we looked at this question with regards to vehicles used by council staff for operations such as road development, we actually need to look at this for the council as a whole. We often have the argument as to whether or not it will be Public or Private sector lead movement and the reality is that for people to change they need to see a top-down reform. The general public need to see Public Sector staff adapting their modes of transport before conforming. The council has the opportunity to introduce new travel means for civil servants to/from meetings that they need to attend. A region of X km can be mapped out where active travel (including E-bike and e-cargo bike) must be used. Outside of this region EV can used. MaaS applications can be used with booking platforms and the bus/train or any other Luas model networks can be linked in for greater distance travel.
We also support Fleet electrification and the use of low emissions fuels such as biogas and hydrogen.

11 What changes should be considered in relation to the management of Ireland's road network (e.g. reducing speed limits, additional road pricing, or restrictions for specific vehicles in urban areas) to promote emissions reductions?

Please provide details in the text box provided:

areas) to promote emissions reductions?
We strongly support the reduction of the speed limit to 30 kilometres per hour on all urban roads other than limited access grade separated highways for safety reasons and to encourage active travel. This would also reduce power requirements and emissions as well as increasing EV range.
Local authorities should have the power to set road pricing to match local needs preferably enabled by a national system of compulsory geolocation logging. This could be as simple as a phone app and will be built into future semi and fully autonomous vehicles and could be done at a national level but would be even more effective if done at an EU level.
Local authorities should also have the power to limit the access of high emission or oversized vehicles to designated areas or at designated times. Local authorities should also be compelled to limit the use of polluting vehicles where air quality standards are being breached

12 What other opportunities exist to support the decarbonisation of the Transport sector?

Please provide details in the text box provided:

Priorities to reduce Transport emissions

Priority
1 Reduce the distance needed to reach everyday destinations. (Long Term)
2 Switch to lower energy/emission modes. (Medium Term)
3 Reduce size & weight of vehicles (Medium Term)
4 Lower the speeds (Short Term)
5 More efficient/lower emission power/fuel (Short Term)

Why?
1 Shorter journeys equal less emissions. (absolute total figures are relevant, not emissions per person- or vehicle-km) More trips become possible by active travel. Shorter trips allow lower speeds.
2 Active travel is naturally zero emissions as well as having health, social and cost benefits, public transport is naturally lower emission than using individual private vehicles.
3 Lighter vehicles require less energy to move and so less emissions. Lighter vehicles are also safer for those around them and so reduce the “arms race effect” of ever-growing vehicle size and lower number of pedestrians & cyclists.
4 Lower speeds require less energy to move and so less emissions. Lighter vehicles are also safer and so reduce the “arms race effect” of ever-growing vehicle size and lower number of pedestrians & cyclists. Average driving speeds are circa 25kph yet cars are optimised for speeds of circa 100kph, this requires far heavier engines and all vehicles be armoured to survive collisions with vehicles at those speeds vastly increasing the weight, cost and emissions of each vehicle.
5 More efficient vehicles and low emission fuels such as electric powered emit less emissions per distance at a given weigh and speed

How?
1 Compact mixed-use communities, waste less space on wide roads, junctions, medians, verges, and parking. Introduce density minimums.
2 Subsidise and encourage low emission modes tax, limit, and discourage high emission modes. Tax emissions, limit the entry of high emission vehicles to low emission zones, use road pricing to discourage private vehicles. Limit parking through planning restrictions, parking levies, banning free parking and the construction or sale of parking as part of residential, office or retail units.
3 Change vehicle standards at EU level to favour lighter vehicles. Tax heavier vehicles more highly, reduce the maximum weight limit for vehicle classes, lower speed limits for heavier vehicles, limit access for larger vehicles to urban areas.
4 Reduce speed limits, greater speed enforcement, automatic speed logging. Change vehicle standards at EU level to ensure vehicles are optimised for speeds of no greater than 30kph and collisions at those speeds.
5 Advance the ban on the sale of new Petrol/diesel vehicles. Increase the duty on Petrol & diesel. Fund the building of a public charging network through levies on the motor industry.

13 What specific measures could be undertaken in transport infrastructure to address existing and future locked-in climate change impacts?

Please provide details in the text box provided:

Embedded emissions particularly those generated by concrete production and the production of EV’s should be considered when future Road Building and parking provision are being considered as well as well measures incentivising the use of EV’s
There is great scope for further increasing the contribution of transport to climate action. At its simplest, transport emissions could be reduced by reducing the number of trips taken, or by increasing the percentage of trips taken by active travel (including ebikes and scooters). The more complex challenges arise in addressing the problems and path dependencies in the planning system which lead to car dependency and sprawl, and the difficulties in changing lifestyles and behaviours.
· Given that most short trips are under 5km in length, a key target should be to increase the percentage of active modes in short trips. In the Netherlands, 27% of all trips are taken by bike.
· Making cycling more appealing means reallocating roadspace to cycling and walking, designing junctions for cyclist safety and setting a 30 km/hr default speed limit.
· There are many successful examples across Europe of cities and countries where big shifts towards cycling and active modes have been achieved in relatively short periods of time.
· Ebikes and escooters are ‘game changing’ technologies as they extend the distance people might be willing to cycle especially in hillier terrains. The emergence of cycle superhighways to facilitate longer commutes could be introduced with incentives to scrap cars, or credit notes to purchase ebikes.
· Longer trips taken requires better integration between bikes and public transport. Bike parking at train stations is essential, as are facilities to take bikes on board trains. Bus stops, train stations all need excellent, secure bike parking infrastructure.