

The Member for Ireland of:



Ms Jennifer Cullen, Policy Governance & Coordination Division, 25 Clare Street, Dublin 2

Friday 5 August 2016



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Re: Consultation on Statement of Strategy 2017 -2019

Dear Ms. Cullen,

On behalf of Cyclist.ie – the Irish Cycling Advocacy Network and An Taisce, I wish to make this submission in regard to the above consultation.

The overarching strategic direction, high level goals and objectives of the Department of Transport, Tourism and Sport must be towards reducing CO_2 emissions from the transport sector – and the key performance indicators in the Statement must reflect that priority. More specific and additional points are made below.

Over the last seven years, there has been minimal priority given to the Department of Transport, Tourism and Sport's: Smarter Travel - A Sustainable Transport Future A New Transport Policy for Ireland 2009-2020 and the National Cycle Policy Framework 2009-2020 (NCPF). These complementary policies were meant to mark a switching point in the direction Irish transport policy was taking – i.e. towards lower CO2 (and other) emissions, a lower dependence on fossil energy and a far great emphasis on creating settlements which are sustainable in any meaningful sense of the term (and hence safely walkable and cycleable). Additionally, these policies were meant to support the nurturing of a healthier population where obesity and overweight levels decreased, rather than increased. Therefore it is imperative that these two policy documents /





frameworks are accorded the priority they are due in terms of political action and funding.

In bullet point form, it is essential that the following points are prioritised in the new Statement of Strategy:

- Implement the Smart Travel policy in full so as to reduce dependence on car transport and hence car use
- Implement the NCPF in full and ensure that 2020 targets (10% of all trips to be taken by bike by 2020) are met.
 - Make cycle training instruction available and fund the provision of same for every Primary School child in Ireland
 - Agree upon and develop a National Cycle Network (NCN). Currently no such agreed / adopted NCN plan exists which means that the planning of individual greenways is taking place in a strategy vacuum.
 - Prioritise integration between cycling and public transport at every single public transport stop/station. For trips over 5-10km, this is essential if car use is to be decreased.
- Implement the National Physical Activity Plan for Ireland (2016) thus creating and building upon meaningful links between sustainable transport and health policies.
- Ensure that Local Authorities conduct reviews of speed limits as set out in Guidelines for Setting and Managing Speed Limits in Ireland (2015)
- The following key performance indicators need to be used:
 - o Total CO₂ emissions from the transport sector
 - Total numbers of population using public transport, cycling and walking as their main means of transport
 - Total number of minor, serious, and fatal cyclist casualties in road traffic collisions (with RSA / Garda Síochána data linking directly to hospital data and with sports cycling casualties differentiated from utility cycling casualties – currently the data is largely undifferentiated)

Further points:

- In terms of ongoing assessment and review we recommend that within the transport sector all projects approved should be submitted to full Appropriate Assessment (including health and environmental grounds) and Benefit-Cost Analysis / Multi-criteria analysis, in line with Department of Finance and DPER guidelines and latest practice.
- Greater emphasis is required in assessing and reporting on the success or lack of success of targets in terms of the performance indicators set out. The reasons





why some targets are successful and others not, need to be part of the learning process, and feed into future decision making.

Finally, our priorities are summarised in the following graphic.



I would be grateful if you could acknowledge receipt of this submission.

Yours sincerely,

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