Chambers Ireland submission to the Department of Transport on the National Investment Framework for Transport in Ireland

May 2021

Chambers Ireland is the State's largest business representative network. We are an all-island organisation with a unique geographical reach; our members are the Chambers of commerce in the cities and towns throughout the country – active in every constituency. Each of our member chambers is central to their local business community and all seek to promote thriving local economies that can support sustainable cities and communities.

In September 2019, our Network pledged to advocate for and support the advancement of the Sustainable Development Goals. In doing so, we use the Goals as a framework to identify policy priorities and communicate our recommendations, and we have a particular focus on five of the goals- decent work and economic growth, sustainable cities and communities, advancements in gender equality, and progress in climate action.[1]

Chambers Ireland is delighted to contribute to this nationally important policy review, and we are very grateful to the department and the minister for having the foresight to instigate it. Transport is perhaps the most important of state policy, all activities within the state, be they business, personal, private or otherwise, are contingent upon the appropriate transport infrastructure being in place to facilitate them.

[1] The Chambers Ireland SDGs. Available at: https://www.chambers.ie/policy/sustainable-development-goals/chambers-ireland-sdgs/

Introduction

Transport infrastructure is vital to creating the resource-efficient, quality, densified urban living which is necessary for the creation of sustainable cities and communities, whether that be local active travel supporting infrastructure, nodal inter-urban high-volume connections, or inter-city high speed options.

Chambers Ireland have consistently argued[2] for greater and better investment in our transport infrastructure not only because of the quality-of-life benefits, but also for the economic competitiveness benefits, and the environmental benefits. Our member chambers are united in the vision of an Ireland where localities are transformed to become more person focused and getting the active transport infrastructure right is fundamental to that.

Our urban areas need to move towards locally active travel nodes, with efficient and affordable public transport linkages between urban nodes. This is as true for our smaller towns as it is for our larger cities. Access to our towns and cities will need to become less dependent on private vehicles like cars, if only because of their stranglehold is squeezing the economic life out of our urban areas. Creating train lines that can adequately serve the population bases, not just along the Dublin-Belfast/Limerick/Cork routes but also including Dublin-Galway/Sligo, needs to become a corner stone of the revised National Development Plan and the NIFTI.

Each of our member Chambers is central to their local business community and all seek to promote thriving local economies that can support sustainable cities and communities. Because of this deep sense of place is so fundamental to the identity of each and every Chamber they, perhaps more than any group, understand both the national/regional importance of inter-urban connectivity, and also how the intra-urban transport environment impacts upon their local economy.

Our membership has taken the view that sustainable transport has become critical to the future economic wellbeing of their towns, cities, and regions and believe it, in combination with the decarbonisation of our electricity supply, to be the most important policy programme of the coming decade. Without a tremendous shift in how we move people and goods within, to, and from our country we will not achieve our 2030 CO_2 targets.

[2] Chambers Ireland's submission to the Department of Transport's Sustainable Mobility Policy Review – February 2020

Consultation Questions

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?

Chambers Ireland have repeatedly argued[3] for greater and better investment in our transport infrastructure not only because of the quality-of-life benefits, but also for the economic competitiveness benefits, and the environmental benefits.

Unless we get transport right, we will get nothing else right. Most importantly we will not be successful in having our economy transition to carbon neutrality. Unless we transform how we move, how we live, and the economy that underpins our communities we will fail to develop into a sustainable society.

In the coming decades, there must be increased and sustained investment to deliver a safe and sustainable land transport network which supports prosperous communities, promotes balanced development, and helps to realise our climate change goals.

Our urban areas need to move towards locally active travel nodes, with efficient and affordable public transport linkages between urban nodes. This is as true for our smaller towns as it is for our larger cities. Access to our towns and cities will need to become less dependent on private vehicles like cars, if only because of their stranglehold is squeezing the economic life out of our urban areas.

Transport infrastructure shapes how we live our lives, where we can live and the economic opportunities available to us. As a result, when infrastructure changes, we alter our behaviours, and consequently the demands we place upon this infrastructure. This creates dynamic feedback loops which often lead to unpredicted and unpredictable outcomes. This feedback creates pressures of its own, as we see with the interaction between transportation and sprawl, but through incentivising sustainable travel choices policy decisions can amplify the National Planning Framework, reinforcing overall government policy.

We welcome that the Department's paper on 'The Purpose of NIFTI' recognises the facilitating role of transport in Irish society, such as access to high-quality childcare, education, and increased employment opportunities. Nonetheless, it is essential that future investment in transport

[3] Chambers Ireland Submission on the National Development Plan Review to Renew Consultation – February 2021

projects/infrastructure must meet at least one, or more, of the National Strategic Outcomes (NSOs). The more that a project can meet of the ten strategic outcomes, the better. We are also pleased to learn that for the occasions when a certain type of investment performs strongly against one NSO but negatively against another, these negative considerations will be balanced through a new strategic assessment stage in the project lifecycle.

Lastly, we must see comprehensive alignment between the ten NSOs and the revised National Development Plan (NDP) later this year. We continue to advocate for transport-oriented development as although transport is a key component of delivering compact growth, effective land use policy is necessary to reduce the need to travel and deliver the population densities required for viable public transport services. Chambers Ireland reiterates this request here.

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?

Sustainable transport infrastructure is vital to creating the resource-efficient, quality, densified urban living which is necessary for the creation of sustainable cities and communities, whether that be local active travel supporting infrastructure, nodal inter-urban high-volume connections, or inter-city high speed options.

The NPF estimates an increase of one million people in the population in the next twenty years. Where this population lives and works will be a key factor in how Ireland develops, socially and economically, and the NPF has set the objective of accommodating one quarter of the growth in Dublin, one quarter in the other four cities, and the remaining half in towns and rural areas. The provision of appropriate transport infrastructure will play a crucial enabling role in the delivery of this objective and supporting quality of life for all Ireland's inhabitants.

Making our urban spaces attractive places which will support the denser populations that the NPF projections expect them to be able to meet the needs of. This will require significant additional investment in transport networks, particularly public and active transport networks. Our urban, intra-urban, and inter-urban, transport networks need significant upgrading so that public transport can be effective, and active transport can become the primary mode of travel for our daily needs. The fifteen-

minute neighbourhood, presented by our colleagues in Dublin Chamber,[4] and the 10-minute towns analysis that our Tralee, Ennis, and Carlow member chambers worked with the southern regional assembly to produce[5] underlines this concept of hyper-proximity which should be adopted by planners and Local Authorities across Ireland to enhance both quality of life and sustainability. Good public transport is essential to realise the vision of fifteen-minute neighbourhoods.

However, the densification of Ireland's five cities, and other urban areas, will place additional strain on transport networks which are already approaching capacity in many locations. For the NPF spatial goals to be delivered, it is therefore essential that urban congestion is tackled. This will mean increasing public transport capacity and usage and investing in active travel to discourage private car use as much as possible. Traffic is a key concern. Congestion carries significant costs with it, but the greatest harms are done to quality of life.

Spatial and economic planning plays a significant role in the creation of movement and investment patterns and their associated energy, carbon, environmental and social impacts. It is essential that at every juncture compact dense development is supported by high quality sustainable public transport corridors and services. Effective spatial planning based on mixed used developments and the connectivity via public or sustainable transport modes of residential, amenity and employment locations also has a major role to play in reducing traffic congestion and avoiding sprawl.

Outside of the major cities, the vibrancy of towns must be supported as attractive places to live and work. This will mean ensuring reliable access to services and amenities, particularly for communities that are highly dependent on a small number of regionally important transport links. Given that transport in smaller towns largely does not face capacity constraints, a key focus will be meeting maintenance requirements for existing infrastructure to provide a guaranteed level of connectivity to centres of scale. This must be supplemented by the targeted provision of new infrastructure and services where necessary.

For Key Towns And Regional Growth Areas where there is an existing bus service, these services often serve routes which are no longer optimal, often ignoring, or underserving, key developments such as third level centres of education, new industrial and retail parks, or recently developed housing. Often the service is infrequent or irregular, and the quality and accessibility of the vehicles undermines the environmental benefits of public transport, while also excluding members of the public; people with additional needs, children, the elderly, people with buggies are often excluded from using these

[4] Dublin, the 15 Minute City.
[5] SRA 10-minute towns

services. To complement the other elements of NIFTI it is important that in Key Towns and Regional Growth Centres there is a standardised, consistent, rational, reasonable, and efficient public transport alternative to using private vehicles.

When it comes to encouraging compact growth, the success of NIFTI is interdependent on the success of the NPF. On the one hand, to make our urban areas attractive places to live and work, transport policy and the transport network need to address urban congestion and provide affordable, comprehensive, frequent and reliable public transport and active travel options. On the other hand, given that the viability of many public transport solutions is contingent on the population density of a the areas served, the planning regime needs to successfully encourage urban development and densification and discourage sprawl. For urbanisation and the delivery of compact growth in our towns and cities to be successful, we need to have efficient, reliable, and safe transport in our urban areas that is linked with the idea of transport-oriented future development.

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

Our low-density population results in sprawl which makes efficient public transport a challenge. The absence, or unreliability, of local and regional public transport forces people to rely on private vehicles as their primary means of transportation/ This increases congestion which creates pressure for increased road capacity. This increased capacity impels housing development ever further from the urban cores – creating ever more sprawl.

While we have made significant progress in building a national road network, traditionally we have not systematically evaluated multi-modal options during the planning and design phases of road construction. We have all too frequently treated public transport capacity on roads as an afterthought and left active travel nowhere. This must be urgently addressed with transport-oriented-development at the core of planning, ensuring that transport links and options support the planning and development we need to make the NPF a success.

There is little that we can change about the rural population, which is already dispersed across once-off builds, and they will continue to rely on private transport for a considerable time, although we can incentivise the use of more environmentally friendly options.

However, even in rural areas, most travel is over short distances, and are journeys which are easily made using bicycles and e-scooters. It would also be possible for these journeys to be made safely,

if secure and segregated space was available. It is the cars on rural roads which makes active travel on them unsafe.

At the inter-village and inter-town level, where possible, dedicated routes for active travel should feed into local public transport hubs which connect people to more urban areas. Within those urban areas our towns need to place active travel first in how they adapt to the changing climate and economic pressures.

In doing so, regional accessibility will dramatically open up as people move to areas that can become easily commutable. This will have positive knock-on effects for regions across Ireland in the coming years as flexible and remote working become the norm and the need to reside in cities near employment centres lessens. This will also be a positive knock-on effect for many businesses that are based outside of large urban areas, bringing increased economic activity to regional and rural areas.

While it is often supposed that EVs will be a one-to-one substitute for cars in rural/regional area, a key challenge will be to ensure that the electricity network operates reliably for all users as EV numbers increase, which will include work to modify local electricity distribution networks. It may also be necessary to shape peak electricity demand for vehicles. Without incentives such as smart charging, users are unlikely to charge their vehicles at off-peak times, potentially adding markedly to peak grid load. Given that there has been little investment in our regional areas, in combination with a strong reliance on once-off builds there is the risk that our Low-Voltage distribution networks will not be able to keep up with the demands that EVs will place upon them.

Investment in transport will play a key enabling role in the achievement of Strengthening Rural Economies and Communities (NSO 3), aiming to ensure that our rural areas and regional towns are attractive places to live, capable of supporting vibrant local communities and dynamic, innovative businesses that can compete on a national and international level.

Enhancing regional and rural accessibility, with improved services and reliable journey times to and between centres of scale, and pursuing compact growth are essential to ensuring that economic development and opportunity is distributed across the regions, with conditions that attract investment and foster opportunities for indigenous employment and enterprise growth.

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

To support the continued vibrancy of rural Ireland, rural areas must be attractive places to live and work. This will mean ensuring reliable access to services and amenities, particularly for communities that are highly dependent on a small number of regionally important transport links. Better connectivity is critical to ensuring good accessibility for these communities, which they need to thrive.

However, providing transport services that meet the accessibility needs of all regional and rural users and businesses alike is a major challenge, given the range of different needs and the barriers to providing a reliable, cost-effective transport system. Limited public transport and declining local services are major factors behind this relatively poor accessibility in many areas, and helps to explain the car-dependent behaviour found in these areas.

While headline projects such as BusConnects, Luas extensions, and the Dart Expansion plan are essential to increase the efficiency, regularity, and throughput of our existing public transport resources, and are projects that will be greatly complemented by new developments like Metrolink, much of the most transformative work will need to be conducted at the local level in rural areas across Ireland. Our member Chambers are united in the vision of an Ireland where localities are transformed to become more people-focused and getting the active transport infrastructure right is fundamental to that.

Investment in rural transport links local economies and communities is likely to become increasingly important as the pandemic has enabled the relocation of many individuals from major urban centres. To support the livelihoods of people in rural economies and communities, the planning and design process needs to be focused on transport networks, including public and active transport links. Sufficient infrastructure to enable inhabitants in rural parts of the country to go about their daily commute or errands should be based on sustainability and safety, without the need to always use a car.

Furthermore, transport should be accessible and affordable to all. The most appropriate transport network will be determined by the land use planning, geography, and density of a location, varying on whether urban and rural and on the scale of the location. We take this opportunity to emphasise the principal requirement for the provision of a smart, integrated, accessible, affordable and clean technology public bus service and rail network and infrastructure at local, regional, and national level.

Although rural areas present a significant challenge to transport planning, the correct investment in this infrastructure in the coming years also presents significant opportunities to significantly increase levels of investment in regions across Ireland that will need it in the post-pandemic recovery.

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

One of the chief concerns of our Chamber network is the social, personal, and economic costs of commuting. Long commutes are detrimental to quality of life. Most commuters in Dublin, in the city with the slowest 'last mile' of commuting pre-Covid-19, spent in excess of ten hours commuting each week (in Europe only Rome is worse). This creates lost opportunities for everyone caught in this traffic and creates inflexibility in the workforce. The opportunity cost, as large as it is, is also made worse by the direct costs, in the absence of appropriate public transport options people are forced to use private vehicles at enormous personal cost.

There is a strong relationship between the mode of transport that people take and the time it takes them to make that journey. As such, at a broad level, focus should be placed on time spent travelling as a metric for determining the relative success of projects within the frame of sustainable transport. While people will be willing to walk several minutes to a bus-stop, hurdles such as pedestrian crossings reduce the area that that can be reached in that time. Modal change will be achieved if people can access reliable and efficient public transport and active transport infrastructure within fifteen minutes of their home to commute to work or access the wider urban environs.

With that in mind, fifteen-minute neighbourhoods are the ideal that transport policy should centre around. Shared bicycle schemes, eScooters, quiet routes and pedestrian-permeable streets all expand the area which is accessible within those fifteen minutes. Conversely hostile transport architecture narrows that range, and forces people to rely on private transport. Within neighbourhoods, the number of active-travel-only intersections should be maximised through the clustering of people friendly streets together, and then surrounding these fifteen-minute neighbourhoods with access points to public and private transport options on peripheral roads.

In addition, there are many obvious and advanced projects that need urgent work and investment– such as the Dart Extension, the Waterford/Cork/Limerick/ and Galway Metropolitan Area Transport Strategies, the Metro, Bus Connects, upgrading the North/South rail-line, the introduction of the Dart Interconnector, etc. All of these will be central to delivering sustainable mobility and encouraging a modal shift in the coming years.

To encourage this modal shift, extensive engagement and education programmes will be essential to develop support among city and county managers, planners, councillors, and most-importantly local communities – the success of a national sustainable mobility programme will be contingent upon making hundreds, if not thousands, of positive incremental changes in combination with the major

headline infrastructural programmes. Active transit networks, be they pedestrian networks, cycling networks, or personally powered transportation networks, act as force multipliers for these major state investments – by making public transport more accessible they expand the footprint of each transport node.

We wish to highlight the submission that Chambers Ireland made to the Department of Transport's Sustainable Mobility Policy Review in February 2020[6] concerning our recommendations for investment in transport infrastructure for sustainable mobility that would encourage a modal shift. These recommendations were broadly outlined under areas including land use planning and transport planning; public transport; active travel; the climate change challenge; congestion; greener buses; and the regulation of public transport. So as not to include an exhaustive list of recommendations here, we would ask that you refer to the link at footnote 5 for our full suite of commentary and recommendations on how transport investment can deliver sustainable mobility and encourage modal shift in the coming years.

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

As a small, open economy, Ireland is crucially dependent on its air and sea links to facilitate business and trading. With Brexit having disrupted many of our traditional supply chains and trade routes, our continued access to external markets has become an even greater national concern. Supporting trade with our partner EU countries, through broadening the number of connections into our EU, and Global, trading partners must be a key part of future policy decisions.

Existing connections need to be deepened, supporting extra capacity that integrates us further with international supply chains, and frequency along existing routes must be increased. This will require increased investment in our passenger and freight connection points directly, and also investment in the multimodal domestic transport networks that knit those international hubs more tightly into our domestic economy.

Additionally, our national infrastructure network must be able to continue to deliver what is required to maintain and develop Ireland's connectivity in times of low demand, whilst ensuring it has the appropriate infrastructure and operating environment to both promote and accommodate higher volumes of traffic that support tourism, trade and the broader economy. By securing access to our

[6] Chambers Ireland's submission to the Department of Transport's Sustainable Mobility Policy Review

ports and airports, transport can ensure international connectivity and support economic development.

With Brexit having disrupted many of our traditional supply chains and trade routes, our continued access to external markets has become an even greater national concern. Supporting trade with our partner EU countries, through broadening the number of connections into our EU, and global, trading partners must be a key part of the revised NDP and NIFTI. Existing connections need to be deepened, supporting extra capacity that integrates us further with international supply chains, and frequency along existing routes must be increased. This will require increased investment in our passenger and freight connection points directly, and also investment in the multimodal domestic transport networks that knit those international hubs more tightly into our domestic economy.

Without a significant improvement in how our international transport nodes are integrated into our domestic travel networks the future of these connections will be at risk. This will undermine the aims of the National Planning Framework. Without the availability of frequent and diverse linkages to the cities and regions at the heart of the global economy, the regional cities which are the focus for the National Planning Framework will become less attractive locations for investment. Our ports and airports are critical to ensuring that goods and personnel can reach growth markets, Brexit has demonstrated the vulnerability of being over reliant on a single market or path to market, critical to rebounding from the Brexit and Covid-19 shocks will be seizing upon new opportunities in new markets.

Regional areas are doubly at risk from this loss in aviation connections, as they not only lose out on the business associated with travel and access to markets, but are also disproportionately reliant on an inward tourism which has been crippled by the pandemic.

To preserve Ireland's international connectivity, a variety of investments in our transport infrastructure may be required. New shipping routes and investment in air freight for time sensitive goods may be necessary. Ports may need to be expanded to accommodate larger ships and provide space for additional customs checks. While NIFTI is primarily a framework for investment in the land transport network rather than the aviation or maritime sectors, surface interventions which contribute to Ireland's international connectivity may be necessary following Brexit and must be supported by the framework.

At the heart of enhancing rural and regional connectivity is the increased international connectivity that shovel ready and planned future projects will bring, The new connections that this will make

possible will be key to creating a wealth of new exporting opportunities for Irish businesses supporting economic development.

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

Climate change is the most significant challenge that we face, and densification/urbanisation is a fundamental element of both our Climate Action and the NDP. Our capacity to meet our 2030 emissions targets is threatened by this rise in transport related emissions, as things stand the momentum on transport related CO_2 emissions will keep driving this increase.

Our current national transport infrastructure facilitates the development of sprawl. If we are to shift our society towards a sustainable economic trajectory it will be transport that forges that path. Transport infrastructure needs to prioritise town centres and areas which are already developed and improve the local transport environment and their public transport connections to other transport nodes and hubs to the point that private vehicles become a sub-optimal choice for the greatest part of the population.

In decarbonising our economy, across all transport modes, it must be ensured that the transition is addressed in both the public and private sectors. Where transport is concerned, as we invest in decarbonised sustainable mobility, this also involves ensuring that our road and rail networks are well maintained and capable of serving safe and comfortable travel. It also means promoting EV market penetration in as fair and equitable manner as possible, growing competitive primary and second-hand markets and supporting installation of associated infrastructure. Over time, this will encourage a market that will lead to a sustained transition to LEVs, away from petrol and diesel vehicles.

Novel technologies like hydrogen are already making clean public transport possible and economically viable on this island[7][8], within the aviation space Airbus[9] sees hydrogen as an important part of its future, while others are banking on green ammonia as an aviation fuel[10], with our enormous national potential to use excess renewable electricity to electrolyse hydrogen, for use as energy dense transport fuels or high quality heat for industry, this is likely to play a major role in both decarbonising

[7] https://www.irishtimes.com/news/environment/hydrogen-powered-bus-takes-to-streets-of-dublin-1.4404748
[8] https://www.translink.co.uk/corporate/media/pressnews/hydrogen
[9] https://www.airbus.com/newsroom/press-releases/en/2020/09/airbus-reveals-new-zeroemission-concept-aircraft.html
[10] https://www.ammoniaenergy.org/articles/zero-emission-aircraft-ammonia-for-aviation/

our transport sectors and providing security of supply to meet out energy needs. Complementing this, biomethane provides another energy economy opportunity for our regions. This also has the potential, (when combined with Carbon Capture Technology) to create net negative electricity while also providing a net neutral alternative to diesel in the HGV and public transport. Ultimately, our economy will need to have cost effective alternatives to private vehicles. Current e-vehicles are, over their entire product lifespan, only less carbon intensive than existing fossil fuel alternatives where they are used for travelling in excess of 100,000km[11] and are at that point very far from being carbon neutral. While increasing the quantity of renewably supplied electricity will minimise the absolute harm these vehicles will do through CO_2 emissions, for 2050 net-zero emissions targets to be hit, all these emissions including the emissions generated through the construction and decommissioning of these vehicles will have to be removed from the atmosphere. Ultimately the cost of recovering these emissions from the atmosphere will be charged to the user of these vehicles through carbon taxes – raising their costs considerably. As fewer people use these vehicles the burden of servicing the infrastructure will fall on a smaller population, again raising the cost for each user.

In terms of reducing environmental impact, the most effective way of reducing transportation's toll on the environment is to ensure that transport options which do not require the use of private vehicles are the easiest, quickest, and safest means of transit. Creating neighbourhoods that are porous to pedestrians and those others who actively travel, that are linked through energy efficient modes of mass transport to other porous neighbourhoods will be essential to transforming our relationship with our environment.

There are huge economic gains to such a strategy. Aside from concentrating the demand for public services which will lead to greater efficiencies of service through specialisation, towns that that facilitate people creating lifestyles which are not reliant on carbon intensive modes of transportation will also enrich those living there. In 2019, the AA estimated that the burden of car ownership for a typical Irish household is almost €11,000[12] whereas for Copenhagen households, of those who have a cargo bike, 30% of households have been able to replace their car with the bike. This massively expands discretionary income for those households, which are also households that are primed for spending their income closer to home.

While it is clear is that a national strategy which aims at increasing the usage of public transport offerings is much needed, and that central co-ordination will be needed to ensure appropriate national level planning and integration, interacting with and co-ordinating at a high level between the Regional

[11] The electric vehicle carbon emissions debate
[12] https://www.theaa.ie/aa/motoring-advice/cost-of-motoring.aspx

Assemblies, the Office of the Planning Regulator, and the Local Authorities will underpin this transition to a low carbon and climate resilient society in the coming years.

Section 4: Transport Investment

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

Critical to our country's economic development will be the maintenance and creation of sustainable cities and communities in the journey towards our collective 2030 and 2050 climate targets. At the highest level this will require massive decarbonisation of our transport systems – which in practical terms will involve the vast bulk of our urban transport shifting towards active and public forms of transport.

Decarbonising transport will involve prioritising zero-carbon, active transport options, low carbon mass transport options, and dedicating far less space to low volume private vehicles. The principle means of reducing congestion is to have more people using modes of transport that do not suffer from congestion and ensuring that people who use private vehicles that are prone to causing congestion don't transmit that congestion to mass transport options.

As noted elsewhere, Ireland has a competitive advantage when it comes to access to renewable electricity, with high peak availability and low-baseline demand, energy storage will play a large role in our energy future. Options such as Hydrogen, biomethane, and green ammonia are likely to feature strongly in our future energy mix, supplying shipping, aviation, HGVs, and public transport with dense and easily stored energy alternatives to today's diesel and petrol.

The challenges associated with this include the speedy rollout of active travel infrastructure and shovel ready projects across the country; funding this rollout; and take up from the businesses and local communities to switch to more sustainable travel choices.

Meanwhile decarbonising the transport sector brings opportunities to improve mobility, reduce local air pollution, and improve the quality of life. It also presents opportunities for industries and businesses to develop and produce new green products and services, which take advantage of business models facilitated by digital technologies and the creation of new high-quality jobs.

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

Future-proofing transport networks and integrating transport and land use remains a particularly challenging issue. For example, out-of-town developments are attractive on one hand (e.g. due to lower land costs), yet are likely to encourage greater car use and are harder to serve by public transport.

On the other hand, by setting clear goals and a long-term national vision, this will allow future transport trends and modes to be shaped, rather than responded to. Decisions should be aligned with local priorities and made to optimise the whole transport system, rather than its constituent parts. Furthermore, a whole-system approach, one not broken down by transport mode, will help to achieve government goals and wider benefits. Measures that reduce modal silos, integrate transport and land-use planning, and ensure that organisational boundaries align better, could deliver significant benefits.

While, given the current penetration of private vehicles, there is a large demand for roads it might become necessary to reconsider transport offerings along existing and potential routes. New routes should bear this in mind at the planning stages and so ensure that, along key transport corridors, the gradients, dimensions, etc. of new infrastructure will not preclude the repurposing of roads into other transport modes, should that decision be made in the future.

Finally, a more tailored approach to local and regional transport planning will ensure that the challenges across regions are adequately addressed. Decentralised decision-making will enable opportunities across towns, cities and rural areas to be seized – but only if funding and strategies are fully integrated.

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

Firstly, there is the capital costs of creating more people friendly streets, and secondly there is the expected reduction in parking charges which will impact upon local authority balance sheets which central government will need to reimburse. While over a medium-term period, revenues will likely fall (the business rates revaluation process occurs over at least a 5-year cycle). The funding model for these mobility improvements will need to consider these second order effects and the incentives which may slow, or even stall, improvements at the local level.

Repurposing land which is in the control of the Local Authorities, but is currently given over to the use as road, should be seen as a potential revenue opportunity for Local Authorities. This land will become available for Local Authorities to licence the use of events, expanded hospitality uses, and markets will all be revenue opportunities that Local Authorities can benefit from.

On the other hand, long commutes are detrimental to quality of life, creating lost opportunities for everyone caught in this traffic and creates inflexibility in the workforce. The opportunity cost, as large as it is, is also made worse by the direct costs, in the absence of appropriate public transport options people are forced to use private vehicles at enormous personal cost.

Smaller cities and towns are generally more compact than conurbations, which means walking and cycling are practical ways of getting around. Consequently, e-bikes are likely to succeed here. Many journeys are short, and for city journeys, an e-bike will often be quicker than a car. However, both soft and hard factors are needed to maximise this uptake, such as separate cycling infrastructure augmented by a campaign to promote cycling.

In the long-run the benefits of people-friendly streets that promote the utilisation of public transport in combination with active transport networks and technologies create a healthier urban environment, reduce CO_2 emissions, encourages resilient local economies, and makes for a more efficient use of finite land resources – in the short-run, the reprioritisation of resources will be zero-sum.

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

The four NIFTI investment priorities (Mobility of People and Goods in Urban Areas, Enhanced Regional Accessibility, Protection and Renewal, and Decarbonisation) reflect and support the National Strategic Outcomes (NSOs) pertinent to transport in a way that its predecessor, the Strategic Investment Framework for Land Transport (SIFLT), did not.

We are pleased that the Department used up to date research and analysis in considering how it can stay on track to meet its NDP objectives as to not have done so would have led to a significant gap between the ambitions of government, which is to align resources to attain NSOs in an evidence-based manner, and the Department, in failing to use detailed research and analysis now available to it, to test at a theoretical level our current strategies against the NSOs.

Chambers Ireland would like to see a commitment to sufficient funding that would supports each of the identified strategic priorities and that this investment is broadly aligned in support of the NSOs, following the completion of the NDP review, and if it is not, what needs to change to achieve this.

Section 5: Further Comments

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

Congestion flows from housing sprawl, and the way that we build our roads, making it ever more difficult to serve localities by an appropriately dense public transport network. The present need for a dense road network diverts resources from other transport alternatives and introduces enormous costs both to the public services through requiring a constant expansion of low-capacity services, which again diverts scarce resources away from their optimal configuration. It also introduces enormous economic costs through damaging the vitality of our towns and privileging businesses which are accessible by private vehicle.

Although the transport system today faces many pressures, challenges and opportunities, there are some overarching facts and trends that shape the current context for decisions about the future. The following final conclusions from Chambers Ireland provide recommendations/reflections for policymakers to address some of these decisions:

1. **Consider transport as a system rather than loosely connected modes.** This will maximise the delivery of government goals and align with the NIFTI to support the achievement of integrated outcomes; it will also bring wider societal benefits (e.g. employment, health, access to services). Aligning policy levers for intervention can improve outcomes, deliver value for money and minimise the burden of a complex governance landscape.
2. **Consider the wider objectives that the transport system can help to achieve.** The transport system is greater than the sum of its parts; it is not just a means of travel, but a critical enabler for the economy and society. Health and well-being, social inclusion, job opportunities, trade, access to services, sustainable places can all be harnessed and achieved through careful design and planning of the transport system. Trade-offs will need to be addressed and this requires broad collaboration across government. It also requires value judgements as to which outcomes are more desirable and, as such, should receive greater weight.

3. **Outline a clear long-term national vision and goals that are mindful of diverse local priorities.** This will allow coming trends and modes to be shaped rather than responded to. Infrastructure decisions have long-lasting effects and there are choices to be made now; these should focus on how best to optimise the whole system.
4. **Consider prioritising active travel methods such as walking and cycling when allocating land use for transport, to promote wider social benefits.** This can change transport behaviours for the better by improving health, increasing physical activity and reducing sedentary behaviour, and reducing air pollution and congestion.
5. As our cities and towns will have to become more people friendly, **transport infrastructure that is hostile to active travel hurts our economy, and our society**. Getting our transportation infrastructure right is a prerequisite to making our town and city centres vibrant again.
6. **Our transport infrastructure has to support the aims of the Climate Action Plan**. Decarbonising transport must involve prioritising no-carbon active transport options.
7. **Integrated active land management, planning, and transport infrastructural development** will be a fundamental element of financing and delivering the aims of the NPD and NIFTI respectively.
8. **Focusing on people rather than vehicles**, helps design better spaces, and is a more technology agnostic approach to future transport infrastructure.
9. Each of these elements are reinforcing, every action multiplies the benefits and effects of the other actions that are taken. **It is therefore essential that the Department takes a holistic approach to all the elements of this review**. Transport is the foundation of our society. Unless we get transport right, we will get nothing else right. Most importantly we will not be successful in having our economy transition to carbon neutrality. Unless we transform how we move, how we live, and the economy that underpins our communities we will fail to develop into a sustainable society.