20190102-NTA-IIP

Draft Integrated Implementation Plan 2019-24 Consultation,
National Transport Authority,
Dún Scéine,
Iveagh Court,
Harcourt Lane,
Dublin 2,
D02 WT20.

Sent by email to:
DraftIIP-SEA-AA19-24Consultation@nationaltransport.ie

01.02.19

Re: SUBMISSION ON NATIONAL TRANSPORT AUTHORITY - DRAFT INTEGRATED IMPLEMENTATION PLAN 2019-2024

Dear Sir/Madam,

An Taisce welcomes the opportunity to take part in this public consultation on the National Transport Authority ("**NTA**") - Draft Integrated Implmentation Plan 2019-2024. We would like to make the following comments for your consideration.

The draft consultation document outlines the regulatory and other functions which the NTA has been Statutorily delegated for transport nationally, as well the additional responsibilities the NTA has within the Greater Dublin Area ("**GDA**").

1. REVIEW OF PLANS AND STRATEGIES BY NTA

The consultation document does not provide a review of the plans and targets in previous NTA strategies. The consultation document, in particular Chapter 2, does not sufficiently address the level of national and GDA policy failure in relation to climate action, congestion, traffic generation, continued car based and free car park serviced development, and lack of action on air pollution which has prevailed in Ireland over the last decade.

This consultation follows a long pattern of previous Statutory and non-Statutory consultations for transport in Ireland advancing plans and targets, which are not implemented or achieved, and where effective action is not taken. At the same time continued motorway building, the renewal of the M20 Cork-Limerick Motorway proposal in the NDP and lack of road pricing and control measures on free parking availability is worsening congestion, emissions, sprawl and air pollution.

2. INTEGRATION WITH NATIONAL OVERARCHING FUNCTIONS AND ADDITIONAL FUNCTIONS IN GREATER DUBLIN AREA

There is an overlap between the national function of the NTA as expressed in the Draft National Implementation Plan for the country as a whole and the specific and more onerous responsibility on the NTA under the Dublin Transport Authority Act (2008) (the "**Act**") to prepare an Integrated Implementation Plan for the GDA covering a six year period, and the implementation of the Transport Strategy for the Greater Dublin Area 2016-2035, which under the SEA Directive requires ongoing monitoring.

The NTA under the Act has particular functions which it has not been mandated for outside the GDA including: Strategic planning of transport; and effective management of traffic and transport demand. This latter function is particularly important as it allows provision for road use restrictions and variable road use tolling and charging, and road and car park pricing in the GDA, which the NTA has failed to advance.

3. CLIMATE ACTION AND LOW CARBON DEVELOPMENT ACT 2015

The NTA has an obligation as a public body under national law. The NTA comes under the definition of a 'Public Body' in the **Climate Action and Low Carbon Development Act 2015**.

Section 15(1)(d) 'Duties of Certain Bodies' states that a:

> "*Relevant body shall in the performance of its function have regard to a range of considerations including: -*
>
> *(d) the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the state."*

4. SMARTER TRAVEL – A SUSTAINABLE TRANSPORT FUTURE – A NEW TRANSPORT POLICY FOR IRELAND 2009-2020

The consultation document does not properly address the status of what continues to be overarching Government Policy - **Smarter Travel – A Sustainable transport Future – A New transport Policy For Ireland 2009-2020 ("Smarter Travel")**.

The Smarter Travel policy contains clear targets to stabilise the total kilometres travelled by the national car fleet at 2009 levels and reduce car based workplace travel from 65 % to 45% by 2020. It sets out 49 specific actions including biennial reports on progress starting in 2010. Smarter Travel also sets out a series of overriding policy objectives in Chapter 3, summarised as follows:

1. *Future population employment growths will predominantly take place in sustainable compact forms which reduces the need to travel for employment and services;*

2. *500,000 more people will take alternative means to commute to work to the extent that the total share of car commuting will drop from 65% to 45%;*
3. *Alternatives such as walking, cycling and public transport will be supported and provided to the extent that these will rise to 55% of total commuter journeys to work;*
4. *The total kilometres travelled by the car fleet in 2020 will not increase significantly from current levels;*
5. *A reduction will be achieved on the 2005 figure for Greenhouse gas emissions from the transport sector.*

Instead of implementing measures to achieve the policy objectives of Smarter Travel, transport policy failure is allowing traffic levels to grow at a rate of 3% in 2017 across the national road network, with the mid west and border at 3.9%. The national cycling targets of 10% have not been remotely advanced, outside of progress in Dublin city centre.

No effective measures are in place to decarbonise transport and contribute to Ireland's EU target obligation to reduce overall emission by 20% of 2005 levels by 2020. Smarter Travel and NTA supported public transport investment is being undermined undermined by continued car based residential, workplace and retail development like "Kildare Village" with unlimited free car parking, which is not addressed by the NTA.

5. ADEQUACY OF SEA

No effective measures are being taken to monitor and mitigate traffic air pollution which as the SEA report identifies is resulting in World Health Organisation ("**WHO**") values being exceed at a number of locations. This is a particular issue in the GDA where taxis and buses, which the NTA is the responsible regulator for, are a major part of the contribution to air pollution.

A particular issue arises in relation to the lack of information on the basis of the climate modelling of climate emissions to 2030 in the SEA. This invalidates one of the key obligations of the SEA Directive.

Please acknoweldge our submission on this conculation.

Yours faithfully,

Ian Lumley,

Advocacy Officer
An Tasice – The National Trust of Ireland