



MAG Ireland

The Irish Motorcyclists' Action Group

RESPONSE OF MAG IRELAND

To

PUBLIC CONSULTATION

On

The National Transport Authority publication titled

"Greater Dublin Area Draft Transport Strategy 2011-2030"

Dublin, March 2011



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The Irish Motorcyclists' Action Group

About MAG Ireland:

Established in 1985, MAG Ireland is the only national organisation representing the owners and riders of the state's 35,000+ registered motorcycles. MAG Ireland's core aims are to promote & protect motorcycling for motorcyclists in Ireland.

MAG Ireland is:

- An Irish rider's rights organisation established by bikers for bikers.
- A voluntary non-profit organisation funded primarily by our member's subscriptions.
- Actively promoting motorcycle use.
- Working to prevent arbitrary restrictions on motorcycle riders.

Areas tackled by MAG Ireland include road safety, training, road conditions, technical harmonisation, taxation issues, consumer issues affecting riders, legislation, licensing and insurance.

MAG Ireland offers a wide range of benefits to its membership including discounts at many retail outlets and events, a subscription to Ireland's only riders rights newsletter, a health insurance scheme and a travel & information service.

For further information see our web site at;
<http://www.magireland.org>



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Preamble

As the only national organisation representing Irish motorcycle users, MAG Ireland is putting forward this submission to represent the position of Irish motorcycle users in the context of the NTA strategy.

MAG Ireland is disappointed to see that the NTA have again failed to grasp the modal distinction between cars, vans and other twin track vehicles and motorcycles, scooters, mopeds and other single track vehicles despite a heavy emphasis on cycling and it's clear recognition as modally distinct from the use of cars, vans etc. Modally speaking, motorcycle use has far more in common with cycling than it does with the use of the car.

MAG Ireland knows that powered two-wheelers (PTWs) - mopeds, scooters and motorcycles - provide the convenience of personal transportation that public transport cannot, but without the problems of high fuel consumption, land grab, congestion and pollution associated with cars. MAG Ireland is determined to highlight the modal distinctions between car and motorcycle use.

MAG Ireland points out that greater use of powered two-wheelers can be achieved without the need for the significant investments of public money associated with providing the infrastructure for increased use of cars or public transport.

Powered two-wheelers are much safer - for riders and others - than we are often led to believe. Their accident rates compare favourably with pedal cycles and are improving faster than for any other mode of transport. They also present less of a threat to most other road users than other motorised transport.

The powered two-wheeler is a genuine & practical alternative to other methods of transport. With only minor modifications to the infrastructure, signage, & rules governing the use of bus lanes, this method of personal transport can prove attractive to commuters and draw road users away from congesting motor cars particularly in situations where public transport is not readily available, and where commuting distances would ordinarily preclude the modes of walking or cycling.

The powered two-wheeler is used most advantageously in an urban environment but it is also an efficient means of inter-urban transport and provides inexpensive and convenient rural transport for the young and those from disadvantaged areas where public transport is limited or non-existent.

For long-distance commuting into urban situations, or within conurbations, the powered two-wheeler mode suffers from none of the parking, excessive pollution or congestion problems associated with cars. Neither does it suffer from the inefficiencies of wasted time and compromised routes experienced with multi-mode travel. Additionally, the use of powered two-wheelers facilitates predictable, and shorter, journey times than cars or public transport.



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Minor improvements in the design of powered two-wheelers, accessories and clothing would also make them more attractive to those uncommitted to using them for transportation. Similarly, improvements in the provision of facilities for powered two-wheeler users such as dedicated parking would also promote their increased usage.

If the NTA is to be successful in introducing a national integrated transport strategy, then it is essential that;

1. It is recognised that Powered Two Wheelers, (PTW's) are modally distinct from cars, something the NTA notably fails to do in the *"Greater Dublin Area Draft Transport Strategy 2011-2030"*
2. Powered two-wheelers are properly considered and facilitated. For example the use of bus lanes/bus gates & advanced stop boxes at junctions which are zero cost measures.
3. A Motorcycling Users Group involving the key PTW stakeholders, the Gardai & MAG Ireland as end-user representatives is established to advise & where applicable, oversee the implementation and adoption of powered two-wheeler related initiatives.

There are many good reasons why motorcycles, scooters & mopeds should be included in integrated transport policies and no compelling reasons why they should not. There is a serious danger that failure to recognise the modal distinction of PTWs & make adequate provision for them will lead to unnecessary impediments to their use thus preventing their benefits from being realised.

Planners, environmentalists and others involved in devising future transport requirements must give motorcycles, scooters & mopeds proper consideration in their future thinking. In particular it is imperative that the modal distinction of motorcycle use is recognised, and that there is an end to the practice of combining the motorcycle & the car in the one modal share.

In Summation:

Experience shows us that when a significant transport strategy is being formulated, the positive role which can be played by motorcycles, scooters & mopeds is usually overlooked. Fully integrated transport planning should take into account *all* modes of transport, the realities of what may be achievable and the influence of public attitudes and perceptions. MAG Ireland's previous experience with the DTO has shown that some transport planners are unaware of, or unwilling to accept, the advantages of powered two-wheelers and instead adopt a simplistic dogma of:

*"walking, cycling & public transport - good,
cars and private motorised transport - bad".*

In the past, when MAG Ireland has raised questions about the omission of powered two-wheelers from such plans or proposals, the customary response has



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been the assertion that "motorbikes" cannot be recommended because they are "dangerous". The facts contradict this assertion showing that powered two-wheeler safety continues to improve more rapidly than that of other modes of personal transport.

A further inhibiting factor is the innate prejudice surrounding any consideration of powered two-wheeler usage in a wider context. We in MAG Ireland refer to this as "passive hostility". This is typified by, for example, the use of the term '*sustainable*' as applied to walking and cycling in an apparently deliberate attempt to marginalise the powered two-wheeler when all three modes can be more accurately described as vulnerable.

MAG Ireland has a track record of making successful progress with local authorities who are beginning to recognise the validity of the powered two-wheeler as a modally distinct form of transport.

MAG Ireland believes that the increased use of PTWs, particularly in situations where their use offsets a car journey or where public transport is unavailable or impractical, can make a significant contribution to each of the five key objectives outlined in the NTA's strategy and we have detailed these situations herein.

Overall:

The general thrust of the strategy document seems to be positive in terms of improving the transport quality in the Greater Dublin Area (GDA), however it fails to note a number of the primary reasons people choose private transport options over public transport regardless of it's availability.

MAG notes the lack of reference to PTWs as a distinct form of transport with more modal similarities to cycles than to private cars. The Dublin City Council Canal Cordon Traffic Count 2009 shows between 2000 and 3000 motorcycles entering the city centre daily, comprising approx 2.4% of traffic in the month of November 2009. MAG notes that, as with cycling, motorcycle commuting has seasonal tendencies with a bias towards the summer months.



Chapter 1

Sets out the purpose of the document which is to represent the top level within the hierarchy of transport plans for the region. Crucially, it notes that the strategy itself sets out policies that discourage transport related activities that run counter to the strategy objectives.

The strategy objectives are principally intended to promote the use of walking, cycling & public transport over and above other modes.

MAG Ireland believes that the omission of reference to PTWs in the strategy runs counter to the Department of Transport's stated objective of encouraging the use of motorcycles per action 20 of the *Smarter Travel* document, which says "*We will look at ways of affording priority to motorised transport such as mopeds and segways in congested areas*".

Chapter 2

Sets out the transport planning & investment framework in which the strategy was prepared. It refers to multiple other strategic planning documents by various government agencies. There is an emphasis on climate change and unsubstantiated claims are made surrounding transport emissions figures.

MAG Ireland believes that the emissions figures quoted have not been adjusted to reflect the downturn in the Irish economy resulting in a reduction of overall traffic volumes.

MAG Ireland calls on the NTA to properly substantiate any and all claims surrounding transport emissions figures.

Chapter 3

Sets out the strategy Vision and five key objectives.

3.2 Strategy Vision: "*Our vision for Dublin 2030 is for a competitive, sustainable city-region with a good quality of life for all.*"

MAG Ireland notes the use of the word "all". We also note that in "*Greater Dublin Area Draft Transport Strategy 2011-2030*" the word "cycling" appears 203 times. The word "motorcycling" does not appear at all. The word "motorbike" appears just once. Does the National Transport Authority consider that excluding a key mode of transport from a major transport strategy document is appropriate?



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3.3 The five key Strategy Objectives:

- *Build and strengthen communities*
- *improve economic competitiveness*
- *improve the built environment*
- *respect and sustain the natural environment*
- *reduce personal stress*

MAG Ireland firmly believes that the increased use of PTWs can support each of the key strategy objectives as outlined above. Here we examine and highlight how increased use of PTWs can support the objectives as set out in the NTA document.

1 – Build and strengthen communities

1.1 Improve accessibility to work, education, retail, leisure and other activities.

PTWs provide an affordable accessible alternative to the private motor car. In particular, across Europe, light motorcycles, scooters & mopeds have a key role in urban transport & can provide affordable & sustainable transport to a wider demographic than can the private motor car.

1.2 Improve access for disadvantaged people (including physical access for mobility impaired people).

The comparative affordability of PTWs, both to purchase and to run, can provide a realistic alternative to the car for people in disadvantaged areas. In addition, PTWs can provide a realistic option for sub-urban & inter-urban commuting at distances which would preclude the use of cycling. Experience in the UK demonstrates that many mobility impaired people choose to use motorcycles & tricycles.

2 – Improve economic competitiveness

2.1 Improve journey time reliability for business travel and the movement of goods.

A key driver for the increase in the use of PTWs over the past 12 years has been the ability of the mode to deliver consistent travel times for commuters, and in particular those commuting from hinterland & sub-urban areas to the city centre and those commuting cross-city at rush-hour.

2.2 Reduce overall journey times for business travel and the movement of goods.

Motorcycles reduce overall journey times comparative to any other mode. Only the train can provide faster journey times, and then



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only in limited circumstances, and without the door-to-door convenience provided by the use of private transport.

2.3 Ensure value for money of transport expenditure.

Many of the options which would facilitate the increased use of PTWs are zero cost or very low cost options. For example, the more widespread access to bus lanes than is currently the case, access to bus gates, the use of advanced stop lines, etc. are all compatible with the mode. There are some situations where the provision of cycle related infrastructure such as secure parking might also facilitate the use of PTWs at little or no additional cost.

2.4 Support business agglomeration and competition.

The reduced journey times and ease of parking afforded by the use of PTWs already contributes to the competitiveness of Irish business through better punctuality (especially relative to public transport). Further use of PTWs would accentuate these benefits.

2.5 Improve access to GDA ports and Dublin airport.

The reduction in congestion resulting from increased use of PTWs would facilitate improved access for other traffic to both the ports & the airport.

2.6 Provide for efficient goods distribution, servicing and access to materials.

The principal use of PTWs in relation to the movement of goods is in the role of courier/dispatch rider in urban & inter-urban situations. In most cases the goods involved are time critical or high value, hence the use of PTWs in this context in the first place. Any facilities or improvements provided for the general PTW user population would have magnified benefit to this particular sub group.

3 - Improve the built environment

3.1 Improve and maintain the environment for people movement (e.g. better quality design of streets and open spaces).

MAG Ireland believes in an integrated approach that protects all vulnerable road users, in particular pedestrians, cyclists, and motorcyclists.

3.2 Improve the quality of design and maintenance of transport infrastructure and vehicles.

MAG Ireland has campaigned for many years for improved design & maintenance of transport infrastructure as a major road safety issue.

3.3 Minimise physical intrusion of motor traffic.

Motorcycles have, broadly speaking, minimal physical intrusion in any case, particularly relative to taxis & larger PSV vehicles such as buses.



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4 - Respect and sustain the natural environment

4.1 Minimise the impact of transport on air quality.

Relative to the typical commuter car user, the typical commuter motorcycle user will spend significantly less time sitting in traffic with correspondingly lower impact on air pollution. Relative to larger diesel-powered PSV's such as buses, PTWs have effectively zero particulate emissions. In general all new model PTWs meet relevant emissions standards such as Euro 3 etc. with further reductions in emissions imminent as a result of the type approval directive currently making it's way through the EU Parliament.

4.3 Reduce greenhouse gases associated with transport.

As noted above, PTWs must meet all required emissions regulations at the time of sale in the EU. In addition, increased use of PTWs improves journey times for other road vehicles, so contributing to an overall reduction in transport related emissions across all modes.

4.4 Improve efficiency in the use of natural resources, especially non-renewable ones (e.g. land, materials, fuels).

Broadly speaking, the average mid-sized motorcycle requires approximately one sixth of the materials and embedded energy of the average mid-sized car. Relative to cars, motorcycles have a longer average usable life, and have a higher percentage of reusable materials at the end of life recycling stage, notably high value metals, and a minimum of non recyclable content, notably certain polymers and plastics. Use of non-recyclable materials is being minimised by all PTW manufacturers.

4.5 Minimise the impact of noise and vibration.

Modern PTWs are as quiet and smooth as modern cars. PTWs impart significantly less vibration to the roads & via the roadway to adjacent infrastructure/people than do heavier vehicles, notably buses & trucks. Historically, a very small minority of PTW users have been responsible for excessive noise output through modifications to the exhaust system in particular. Current EU regulations prevent the sale or use on the road of aftermarket parts which do not meet existing noise or emissions regulations.



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5 - Reduce personal stress

5.1 Improve journey time reliability for personal travel.

One of the major reasons for the significant uptake in PTW use over the past decade has been due to the ability of the typical motorcycle, scooter or moped to exploit efficiencies of space that are simply unavailable to larger vehicles. This results in consistent journey times even where traffic conditions are normally variable, and is particularly noted as a benefit amongst long distance PTW commuters travelling from rural GDA to the center of Dublin.

5.2 Reduce overall journey times for personal travel.

As noted above, PTWs generally make better use of the available road space and utilise their smaller size and manoeuvrability particularly in congested urban situations to make progress where larger or wider vehicles would be unable to do so. This both reduces journey time relative to other modes and improves the consistency of the time taken for a given journey particularly in a commuting situation.



Chapter 4

Attempts to set out the key influences on travel in Dublin and the surrounding counties. It also looks at trends and forecasts in travel growth.

The conclusion sums it up rather well:

"The projected growth in population and employment over the next 20 years, and the recent trends in movement of large numbers of people to live in outer parts of the GDA where travel options are more limited present considerable challenges for the strategy."

MAG Ireland notes that, in the current economic climate, the projected growth and population transfer figures may be subject to question.

The NTA have aggregated all private transport users and in so doing have again failed to distinguish the substantial differences that exist between the modes of 4 wheel (or twin track) vehicles such as cars & vans, and those of two wheeled (single track) vehicles such as motorcycles and bicycles. The NTA appears determined to ignore the modal similarities of cycling and motorcycling.

Chapter 5

Looks at some of the transport challenges, specifically; supporting the economy, serving communities, improving the environment and various constraints such as legacy planning decisions and public acceptability of proposals.

MAG Ireland fails to understand why this chapter missed the opportunity to include PTWs as part of the solution to many of the problems raised in this chapter. Their smaller size and footprint on roads plus the fact that they use less fuel, really is a solution for traveling longer distances in a commuter mode.

Chapter 6

Deals with how the strategy was assembled and how the final options were chosen.

MAG Ireland feels that the selection criteria were weighted in favour of the preferred "environmental" option. With regard to the comment under Section 6.10 *"Options that included a per kilometre charge for all private road vehicles in the GDA scored well"* MAG Ireland points out that all private road vehicles already pay multiple fuel levies, including a carbon tax, and therefore already pay a significant per kilometre charge.

MAG Ireland also believes that a per kilometre charge mitigates against people who have reduced mobility and are forced to use private vehicles, those who were priced out of the city during the boom and are now forced to commute long distances, and those who live in rural areas where no practical alternative public transport exists.



Chapter 7

Sets out the strategy for the period up to 2030 under the following headings:

- 7.2 A hierarchy of transport users*
- 7.3 Joined-up transport and land use planning*
- 7.4 Improving the walking and cycling environment*
- 7.5 Better, easier to use public transport*
- 7.6 Strategic road traffic, freight and travel demand management.*

The key quote here is under Section 7.2 A hierarchy of transport users; *"policies and measures that favour those on foot, cycling or using public transport are fundamental to this strategy and underpin all of the strategy objectives."*

MEASURE OVR 1:

The Authority supports a transport user hierarchy that considers transport user needs in the following order:

- 1. Pedestrians (including those accessing public transport)*
- 2. Cyclists*
- 3. Public transport users*
- 4. Freight, delivery and waste vehicles*
- 5. Private vehicles users*

In all cases, provision must be made for emergency vehicle access as required, and the needs of disabled people should be fully taken into account.

MAG Ireland notes that the private vehicle users, the very road users who contribute most to the exchequer, are at the bottom of the hierarchy. We note that the NTA has classified PTWs as private vehicles even though bicycles, which are almost entirely privately owned, are categorised separately. MAG Ireland again points out the modal similarities of PTWs and bicycles which have far more in common with each other than with other modes.



Chapter 8

Sets out the implementation of the strategy in the context of the various land use and planning guidelines such as the national spatial strategy, local authority/area development plans etc.

MAG Ireland notes that parking provision is a theme throughout, and that the NTA's stated objective is to use parking - or rather the intentionally specified lack of parking - to discourage the use of private vehicles.

While formulating the *Dublin City Development Plan 2011-2017* the Council Planners met with MAG Ireland. MAG Ireland was asked for input on what motorcycle users needed when new developments were formulated. As a result, the Development Plan now has the following provision;

"Section 17.40.6 Motorcycle Parking

New developments shall include provision for motorcycle parking in designated, signposted areas at a rate of 4% of the number of car parking spaces provided. Motorcycle parking areas should have limited gradients to enable easy manoeuvrability and parking. Fixed and robust features such as rails, hoops or posts should be provided to secure a motorcycle using a chain or similar device."

MAG Ireland submits that a similar or indeed enhanced balance of PTW parking facilities be included in NTA strategies where public parking provisions are being considered.

MAG Ireland is concerned that the NTA's proposals to reduce parking availability will have a potential knock-on negative impact on the provision of motorcycle parking.

In relation to the imposition of lower speed limits, MAG Ireland notes that blatantly inappropriate speed limits do nothing but damage public support for road safety in general, and is strongly opposed to such limits at whatever speed they are set.

MAG Ireland will only support the use of lower limits in specific locations such as pedestrian-centric areas, shopping precincts and school entrances. MAG Ireland believes that lower limits should only be introduced alongside other engineering remedies.



Chapter 9

Sets out the NTA's long stated aim of promoting walking and cycling with no less than 20 specific actions identified.

MAG Ireland broadly supports the aims of Chapter 9 and notes that with some forethought many of the cycling related provisions could be adapted to also facilitate PTW use. In particular, the provision of secure parking facilities.

Walking and Cycling

Measure WCY 1:

The Authority will seek:

- *Restrictions on general motorised traffic travelling through the heart of Dublin city centre and other town centres, by diverting through traffic onto alternative routes, whilst permitting through movement for buses, trams or taxis where necessary; and*
- *The retention of access for town centre deliveries and visitor car parking in appropriate locations and at appropriate times.*

MAG Ireland particularly opposes restrictions on motorcycling where these are implemented with the intention of restricting car use, but where the relevant authorities have not had the foresight, knowledge, or understanding to realise that a motorcycle is not a car and that such restrictions are frequently unjustifiable in the case of motorcycles. This is particularly the case where reducing congestion is cited as an example for preventing car travel within a designated area or at designated times. PTWs do not add significantly to congestion, rather their use helps to alleviate it and thus the reasoning used for the imposition of restrictions is more often than not null and void in the case of PTWs. Furthermore, this proposal would inhibit many businesses using motorcycle couriers from transporting urgent documents & goods across the city.

Measure WCY 2:

The Authority will seek reductions in traffic speeds in town centres, and the application of a 30km/h speed limit in the commercial and retail core of Dublin city centre and other town and village centres.

As previously mentioned in our response to Chapter 8, MAG believes that lower limits should only be introduced in appropriate areas alongside other engineering remedies.

Measure WCY 3:

The Authority will seek:

- *Reconfigurations to street space including widening of footpaths and rationalisation of street furniture, poles and signs, and removal of redundant poles, signs or other clutter in Dublin city centre and other town centres and their approaches, to allow for easier people movement, to enhance the quality of the urban realm and to provide more space for people on foot, seating, planting and cycle parking as appropriate;*



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- *To ensure that local authorities develop streetscape design and maintenance guidelines for town centres, historic areas, areas of civic importance and elsewhere, as required, and that streetscape interventions are audited for compliance with the relevant guidelines; and*
- *Improvements to walking and cycling routes approaching town centres, public spaces and areas of civic importance.*

MAG Ireland warns that widening footpaths/narrowing roads increases the likelihood of vehicles coming into conflict with vulnerable road users.

The ever increasing size of passenger vehicles as a result of continuously improving passive safety measures, combined with a significant reduction in lane width, reduces vehicle safety margins for all road users. Additionally, reduced lane widths inhibits the ability of cyclists and PTW users to filter safely.

MAG Ireland notes that the provision of cycle parking can easily be applied in a manner that makes it possible for PTW users to share the infrastructure provided.

Measure WCY 4:

The Authority will seek:

- *The application of a general speed limit of 30km/h on residential roads, and in the vicinity of schools;*
- *The design of new residential areas to provide a safe and pleasant movement environment for pedestrians and cyclists;*
- *The reconfiguration of residential street space to create a safer and more attractive environment for pedestrians and cyclists; and*
- *The use by designers of the design guideline principles and approaches for residential areas set out in the Authority's National Cycle Manual and forthcoming Walking Facilities Manual, and DoT/DoEHLG Manual for Streets*

MAG Ireland supports the objectives of WCY4 noting that in relation to the imposition of lower speed limits, MAG Ireland will only support the use of 30kph limits in specific locations, for example; pedestrian-centric areas, shopping precincts, hospital or school entrances.

Measure WCY 5:

The Authority will seek:

- *The provision of footpaths on both sides of roads and streets in built up areas, except in exceptional circumstances;*
- *The widening of existing footpaths, where these are too narrow to comfortably and safely cater for pedestrians wishing to use them, including wheelchair users and those with buggies or prams;*
- *The maintenance of footpaths to a good standard, and where appropriate the upgrade of footpath surfaces with higher quality materials; and*
- *Audits of existing footpaths, identifying existing constraints and barriers to pedestrian movement such as redundant poles, signage, guardrails or*



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telephone kiosks followed by removal or relocation of barriers or clutter where appropriate.

MAG Ireland broadly supports the objectives of WCY5 while noting that many pedestrian guardrails were placed after consultation and for reasons of both pedestrian and road-user safety.

Measure WCY 6:

The Authority will seek:

- *The provision of tactile paving and the raising of carriageways or lowering of kerbs at pedestrian crossing points to assist mobility impaired people and those with buggies or prams;*
- *Revisions in junction layouts where appropriate, to reduce pedestrian crossing distances, provide more direct pedestrian routes and reduce the speed of turning traffic;*
- *The provision of zebra crossing points or pedestrian signals on all junction arms, at junctions where it is likely to be beneficial to pedestrian safety or convenience, starting with junctions on major roads and with higher pedestrian numbers;*
- *The adjusting of traffic signal controls where appropriate to reduce the wait time for pedestrians in town centres and other built up areas or to increase the crossing time allocated to pedestrians; and*
- *Additional pedestrian crossing points away from junctions, with greater use of zebra crossing facilities or rapid response pedestrian signal facilities.*

MAG Ireland is opposed to the use of sharper corners in order to reduce the turn speed of vehicles because this puts motorcyclists at additional risk. (Also the use of tighter corners impacts on larger vehicles such as buses and trucks, and also bicycles). Motorcycle dynamics mean that in terms of road position - the approach to, the path taken along, and the exit position of a motorcycle are different to other vehicles.

Decreasing the radius of a bend increases the hazard, especially in built up areas of shared road space. A gradual radius is less hazardous than a 90 degree turn.

Measure WCY 7:

The Authority will

- *Support the provision of additional leisure walking routes along river and canal corridors and in the countryside together with provision of facilities for leisure walkers, including seating and picnic areas; and*
- *Seek improvements to walking links:*
 - *From surrounding areas to leisure walking routes; and*
 - *Between leisure routes that are in proximity to each other.*

Measure WCY 8:

The Authority will:

- *Seek the inclusion in Local Authority Development Plans of policies and specific measures to support walking and improvements to walking facilities;*



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- *Seek the provision in Strategic Development Zones, Local Area Plans and planning permissions of direct, convenient and high quality pedestrian routes within new development areas and linking to the surrounding area and public transport access points; and*
- *Publish guidelines on designing for walking and pedestrian access, in the form of a Walking Facilities Manual.*

Measure WCY 9:

The Authority will:

- *Provide online information on walking routes to destinations via its national multimodal journey planner;*
- *Seek the provision of direction signage for those travelling on foot to key destinations, such as important buildings, public spaces and public transport facilities;*
- *Seek the provision of on-street walking maps in Dublin city centre and other town centres; and*
- *Promote the benefits of walking, working with Government Departments, local authorities and others to target areas where the potential for additional walking is highest (also see Chapter 11)*

MAG Ireland broadly supports the measures outlined in WCY7, WCY8, and WCY9.

Measure WCY 10:

The Authority will seek the enforcement of the law relating to encroachment on footpaths and pedestrian crossings by motor vehicles, cyclists, skips and other obstructions.

MAG Ireland points out that;

(i) Under the current Bye-Laws, PTWs are explicitly prevented from parking in designated car parking spaces in Dublin City.

(ii) The *Dublin Canal Cordon Traffic Count 2009* shows that between two and three thousand PTWs cross the canal cordon on a daily basis.

(iii) It is a long standing custom & practice that PTWs park unobtrusively on pavements and use appropriate street furniture for the purposes of securely chaining the PTW to an immovable object to prevent theft.

(iv) MAG Ireland continues to work closely with all local authorities, but particularly Dublin City Council to ensure as far as practically possible that no PTWs are inappropriately parked. MAG has agreed a suitable procedure with DCC for the issue of warnings for inappropriate parking by PTWs which has proved successful to date.

(v) MAG Ireland strongly opposes any attempt to remove the traditional on-pavement PTW parking locations in urban centres, many of which have been in use for half a century or more.



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(vi) Where such traditional informal provision is removed, as was the case on O'Connell St. in Dublin, that designated properly segregated defensible space be provided at the nearest available location in-lieu, and that this be serviced with appropriate anchor points for the securing of motorcycles. Unfortunately in the O'Connell St. situation, adequate replacement facilities have yet to be provided.

(vii) Owing to the historic lack of motorcycle parking provision (due to lack of foresight by civic planners), PTWs simply have no option but to park on the pavement. It is now custom & practice for PTWs to so park in many locations.

Measure WCY 11:

The Authority will:

- *Target measures to improve the cycling environment in areas where there is the greatest potential for trips in cycling distance range. These areas will include Dublin city centre, the Metropolitan Designated Towns, Hinterland Designated Towns, and their approaches;*
- *Seek the provision of high quality cycling corridors, in and on the key radial approaches to Dublin city centre and Metropolitan Designated Town centres; and*
- *Place an emphasis on improving the cycling environment in town centres and their inner approaches before other areas of the network.*

MAG Ireland broadly supports the measures in WCY11 where these do not conflict with or inhibit PTW use.

Measure WCY 12:

The Authority will seek the introduction of measures to improve the cycling environment in targeted areas; such measures will include:

- *Lower speed limits in centres, residential areas and in built up areas (see Sections 9.2 and 9.3);*
- *Reductions in motorised traffic in central areas (see Section 9.2);*
- *Improving cyclist priority and safety at junctions;*
- *Providing high quality segregated cycle lanes, or off road cycle tracks, where speeds or volumes of traffic remain high;*
- *Providing more direct routes for cyclists, including the introduction of cycle contraflow lanes on one-way streets, and the creation of new pedestrian and cycle only links where appropriate; and*
- *Traffic signal control adjustments at junctions to reduce average wait time (this also benefits pedestrians - see section 9.4.2).*

MAG Ireland notes that, consistent with Action 20 of the Department of Transport's "Smarter Travel" policy document, PTWs should be considered as viable companions to cycles in busy urban environments.

As previously mentioned MAG Ireland will only support lower limits in specifically engineered locations.

MAG Ireland believes that the introduction of contra-flow cycling on one way streets, would increase the risk to cyclists due to the poor observational skills of



many motorists.

Measure WCY 15:

The Authority will seek the provision of:

- *Secure on-street cycle parking in Dublin city centre and other town and village centres, in particular close to major retail, leisure or cultural destinations;*
- *Secure sheltered on-street cycle parking at major destinations, for longer stay purposes;*
- and*
- *Secure sheltered cycle parking to meet demand at heavy rail and Metro stations, Luas stops, bus stations and busier bus stops, particularly on higher quality QBC routes.*

Measure WCY 16:

The Authority will seek the provision of secure, sheltered on-site cycle parking and supporting facilities for cycle commuters at:

- *Schools and other education facilities;*
- *Workplaces; and*
- *Other destinations likely to attract cyclists.*

It will seek the incorporation into local authority Development Plans of minimum cycle parking standards set out in the Authority's National Cycle Manual.

Measure WCY 17:

The Authority will:

- *Seek the inclusion in Local Authority Development Plans of policies and specific measures to support cycling and improve the environment for cycling particularly in areas identified in this Strategy;*
- *Seek the provision in Strategic Development Zones, Local Area Plans and planning applications of direct, convenient and high quality cycling environment within new development areas and linking to facilities in the surrounding area; and*
- *Support training of designers in local authorities and consultancies in the application of the Authority's National Cycle Manual.*

MAG Ireland fully supports measures **WCY15, 16** and **17**, noting that it would be both inexpensive and beneficial to all to include secure PTW facilities in the same areas. This would tie in with Action 20 of the Department's Smarter Travel policy.

MAG Ireland also notes with optimism the inclusion in the Dublin City Development Plan 2011-2017 of a quota for PTW parking in new developments. This can, and should, be extended to include places of education and work. The same plan includes provision for 1 secure cycle space for each apartment in a complex along with substantial cycle parking in all new developments.



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Measure WCY 18:

The Authority will:

- *Seek that cycling education and training becomes part of the school curriculum for all primary and secondary levels in the Greater Dublin Area by 2020;*
- *Facilitate cycle training for schoolchildren through the Authority's Smarter Travel Schools programme; and*
- *Seek provision of cycling training for adults – both for those returning to cycling and those who have never cycled before.*

MAG Ireland is fully committed to the promotion of continual education of all road users, and is therefore fully supportive of measure **WCY18**

Measure WCY 19:

The Authority will:

- *Pursue the provision of cycling route signage on the approach to urban centres and to other key cycling destinations;*
- *Provide up to date cycle network maps on the Authority's website;*
- *Incorporate cycle route options into its online multi-modal journey planner; and*
- *Promote the benefits of cycling, targeting geographical areas and groups (including workplaces and schools) where potential for growth in cycling is highest.*

MAG Ireland fully supports these provisions and welcomes the expansion of cycleways to improve the safety of cyclists.

Measure WCY 20:

The Authority will support enforcement of traffic regulations in relation to traffic lights, speeding, overtaking behaviour, parking or driving in cycle lanes, and cycling in an unsafe manner.

MAG Ireland has been calling for this for some time as it is a major road safety issue. The proper enforcement of all traffic regulations will benefit all road users. MAG Ireland would also like to see implemented a mandatory driver education regime for all road users convicted of a road traffic offense. As IBT for PTWs and EDT for cars is already in use, a standard training module for cyclists should be devised by the RSA so this simple measure could be implemented.



Chapter 10

Public Transport.

Chapter 10 sets out a range of proposals in relation to the provision of public transport. MAG Ireland broadly supports the proposals with some exceptions as noted below.

Rail Transport:

With regard to rail transport, the information we get from our members suggests that a very low number of PTW riders use rail services. MAG Ireland calls for the provision of adequate secure PTW parking at railway stations. We believe this can be provided in the context of secure cycle parking facilities at no additional cost.

With regard to the provision of new (or extension of existing) LUAS tram lines, MAG Ireland would once again be available to advise in regard to the siting and signage of tram lines which can pose a serious slip hazard to PTW users in wet weather. In all cases the design/layout of the interface between the tram lines and the PTW user, particularly at junctions, should be subject to rider input.

Bus Transport:

With regard to the proposals surrounding bus transport, MAG Ireland notes that there is a significant interface between bus traffic and PTW traffic in urban situations.

While PTW users can legitimately & legally use a number of bus lanes in Dublin City centre, custom and practice is that PTW users tend to use available bus lanes even where they are technically not permitted to do so. Ireland lags notably behind many other EU countries in relation to bus lane access for PTWs. Dublin in particular has an abysmal record in providing legitimate bus lane access to PTW users.

MAG Ireland would draw attention to the BUS 8 measure as follows;

Measure BUS 8:

The Authority will seek to maintain and enhance the enforcement of parking and traffic regulations that assist bus movement, particularly at bus stops and where bus priority is provided. It will seek to standardise the hours of operation of bus priority measures to facilitate easier recognition of, and compliance with, the relevant restrictions and to ensure bus priority is provided when buses need it. The Authority will explore the potential benefits of regulatory change to enable the increased use of monitoring and recording technology to identify bus lane infringements.

MAG Ireland notes that since PTWs (and other vehicles) are already permitted in bus lanes outside of certain hours, safety is clearly not the issue. The only reason to exclude any class of road user from a bus lane during certain hours is for



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traffic management purposes, and as we have already outlined, PTWs do not add to congestion, but in fact have the potential to reduce it.

Currently, members of An Garda Síochána do not ordinarily prosecute PTW riders using non-designated with-flow bus lanes provided that no other offence (such as speeding or riding erratically) is being committed. This use of Garda discretion has evolved out of a situation where PTW users are broadly recognised not to conflict with other bus lane users, notably cyclists. Studies previously carried out by the DTO have shown no increased risk to other road users using the bus lane as a result of PTWs being present, and there is no evidential reason not to extend the designated bus lane access across the GDA.

Given the long standing situation where custom and practice means that PTW users make use of bus lanes as and when necessary, it is important to understand the reasons and logic employed by PTW users in arriving at this decision. Equally, it should illustrate why those Gardaí who are tasked with the sharp end of traffic management tend to use their discretion in this regard.

Reasons why PTWs should be granted access to bus lanes:

This is a proposal with zero cost to the Government, which will help reduce congestion, reduce pollution, relieve the strain on capital-intensive public transport networks in line with the objectives of the strategy.

PTWs in bus lanes enjoy greater conspicuity to pedestrians and traffic emerging from side roads.

This proposal can potentially help to further improve PTW safety in urban environments by making PTWs more conspicuous to other motorised road users.

Commuting distances are lengthening – PTWs are a viable alternative to car commuting in very many cases, where cycling or public transport are not always available or practical. Given the Dublin City Council Canal Cordon Count 2009 shows an average occupancy of 1.22 persons per car (or sub 25% occupancy, based on a typical 5 seats), PTWs represent a viable, and space saving commuter option.

PTWs are highly efficient in terms of road space utilisation and fuel consumption, materials used in production, lifetime energy usage, and end-of-life reuse / recycling.

PTWs will not impede buses, as - unlike bicycles - even the smallest are capable of 50kph. Unlike cars and other vehicles, PTWs will not impede buses at the beginning/end of bus lanes or at junctions.

PTWs will not endanger cyclists. PTWs can coexist with bicycles in a bus lane with far greater clearance / safety than any vehicle currently permitted in bus lanes.

Extending the PTW designation to all bus lanes will encourage more car drivers to consider a switch to PTWs with resultant reductions in both pollution and



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congestion. There is anecdotal evidence that PTWs are being purchased by car owners for commuting as a direct alternative to car use.

PTW access to bus lanes is now widespread in cities in the UK and elsewhere in the EU. The particular experience of UK cities that have permitted PTWs in bus lanes has been very positive. This is significant as UK conditions are similar to ours.

Ireland is increasingly isolated in its apparent stance of treating PTWs as a problem. Internationally, the approach is increasingly to regard PTWs as an important element of urban transport planning.

Despite having the support of all the key stakeholders, including many in the cycling community, and despite the RSA's own studies finding no adverse effects in the use of bus lanes by PTW users, there has as yet been no move to expand the existing legal use of certain bus lanes to all bus lanes in the State. MAG Ireland finds this situation unacceptable.

Bus Gates:

Bus Gates are a relatively recent concept in Ireland, but yet again the utter lack of foresight by the authorities has resulted in the farcical situation whereby riders have been seen pushing their motorcycles through the bus-gate to avoid prosecution, while cyclists face no such restrictions. Bus Gates are no more than an exclusion zone for private cars, and once again the Irish transport authorities have failed to make the modal distinction between a car and a motorcycle.

MAG Ireland will continue to push for the common sense solution of allowing motorcycles to legitimately use bus lanes and bus gates. MAG Ireland recognises and acknowledges that many of the key stakeholders including the bus operators, the taxi drivers, many individuals in the cycling community and the local authorities as well as An Garda Síochána support our position.

The roadblock on this issue is a political one and has no evidential basis whatsoever.

Every time MAG Ireland raises this issue, we meet the same tired responses and so we've outlined here the objections previously raised and we deal with each point in turn.

Objection 1: "Motorcycles are dangerous, we don't want to encourage them"

A glowing example of what we refer to as "*passive hostility*", the usual assumption is that because motorcycle users, pedestrians and cyclists are vulnerable, they – and not the vehicles that hit them – are dangerous. The perversity of this argument is that over 60% of motorcycle user casualties in urban areas, arise from collisions with other vehicles, usually cars, where the motorcycle has right-of-way and is travelling within the speed limit. Allowing



motorcycles to travel independently of these other vehicles helps reduce potential for conflicts.

Objection 2: "*Pedestrians would be put in danger*"

Allowing motorcycles to travel in the bus lane would make them more visible to people crossing the road. This is more likely to improve pedestrian safety. There is no evidence that pedestrians would be put in danger, and the use of bus lanes by PTWs outside designated hours supports this view. In London, pedestrian accident rates have fallen in bus lanes where PTW's have access.

Objection 3: "*Cyclists would be put in danger*"

Both pedal cycles and motorcycles are susceptible to the same risks presented by adverse road and traffic conditions. Both are narrow and manoeuvrable, and do not impede each other at junctions. In addition, their riders share a common understanding of the need to give each other room. Added to this, being overtaken by a motorcycle is less hazardous than is the case with buses, taxis, emergency vehicles, etc.

Objection 4: "*Bus schedules will be disrupted*"

Motorcycles are narrow and manoeuvrable. Experience in other countries, notably in the United Kingdom, has demonstrated no adverse effects on bus schedules. Further, motorcycles using bus lanes are not adding to congestion elsewhere along bus routes. The DTO's own study found no evidence of disruption to bus schedules.

Objection 5: "*Enforcement will be more difficult*"

Seeing motorcycles in bus lanes does not encourage drivers of other vehicle types, eg: cars and goods vehicles, to invade the bus lanes. Road signs used to designate bus lanes clearly identify which vehicles are permitted. Currently, PTW users are not usually subject to enforcement unless the PTW is being ridden in such a manner that it would constitute a danger to other road users. There would therefore be no measurable difference in the enforcement position.

Objection 6: "*Motorcycles break speed limits, allowing them to use bus lanes would encourage this*"

Another common element of the "*passive hostility*" displayed by non riders, born of the mistaken belief that "motorcycles are dangerous" (See above). This argument is based on dogma, not on fact.

Studies have shown that people tend to overestimate the speed of a moving motorcycle due to the relative size, profile & aural signature of the PTW compared to other vehicles.

Motorcyclists are all too often on the receiving end of the results of bad driving



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(Over 60 % of urban motorcycle accidents are caused by other road users). Because of this, motorcyclists have a keen sense of self-preservation. This is supported by novice motorcycle training that is of a higher standard than that of other road users. Riders are aware that a rogue car or erratically ridden bicycle could pull into their path at any time and, in the main, ride defensively and at a sensible speed.

The speed of commuter traffic itself tends to be self-regulating, with the speed of all bus lane users further regulated by the speed of the buses & taxi's that use them.

An Garda Síochána already carry out regular speed checks along bus routes. Based on our previous discussions with An Garda Síochána & the RSA around this very issue, we understand there is no evidence that the percentage of PTW users exceeding the speed limit is any different to the percentage of other road users who do so. An Garda Síochána have reported no issue with regard to PTW users speeding in bus lanes. In fact, as noted above, riders in bus lanes tend, in the main, to be aware of the potential hazards, and ride defensively.

Problems with speeding motorists of all classes can be solved by a combination of education and more effective enforcement measures.

Measure BUS 8

With regard to the statement in measure **BUS 8** that;
"The Authority will explore the potential benefits of regulatory change to enable the increased use of monitoring and recording technology to identify bus lane infringements."

MAG Ireland would point out that such monitoring and recording technology, if introduced in the absence of designated bus lane access for PTWs, would likely increase the risk to riders in congested areas as they seek to (legitimately) filter through stationary or slow moving traffic in lieu of using the bus lane to make safe progress as is custom and practice at present.

MAG has long called for the normalisation of the current position and the extension of the designated PTW access from current limited city centre locations to all with-flow bus lanes across the state.

The current situation surrounding the bus gate in Dublin city centre is unacceptable, and MAG Ireland deplores the lack of understanding that has resulted in this ridiculous situation arising.

MAG Ireland reminds all stakeholders of the simple fact that cars and motorcycles are not the same thing, that the motorcycle is a mode in and of itself, and not an extension of the car mode or an adjunct thereto.



Chapter 11 Roads, Freight, and travel demand management

Measure ROAD 1:

The Authority will seek that road development in the Greater Dublin Area will satisfy the following principles:

- (a) That the proposed scheme is consistent with the overall Strategy objectives and Government policies related to transport and that the need which is proposed to be addressed by the road scheme cannot be effectively and satisfactorily addressed by other mode choices;*
- (b) That alternative solutions such as traffic management or demand management measures cannot effectively and satisfactorily address the particular circumstances prompting the road proposal or are not applicable or appropriate;*
- (c) That the demand needs or the development needs giving rise to the road proposal are in accordance with the Strategy planning objectives for the region or area impacted by the road proposal;*
- (d) That the development of the road scheme does not diminish in any material way the expected beneficial outcomes of the Strategy;*
- (e) That the proposed road scheme will not give rise to a significant or unsustainable increase in the level of car trips;*
- (f) That the proposed scheme is consistent with Smarter Travel objectives and targets;*
- (g) That the road scheme, other than a motorway proposal, will be designed to provide safe and appropriate arrangements to facilitate walking, cycling and public transport provision;*
- (h) That any proposed road developments in proximity to residential areas or bypassed town centres should incorporate traffic management measures to reduce traffic speeds to appropriate levels;*
- (i) That any major new national road schemes would consider and incorporate, where appropriate, demand management proposals as an integral part of their delivery; and*
- (j) That there will be no significant increase in road space on radial roads inside the M50 motorway.*

MAG broadly support the proposals in **ROAD1** while noting that applying unrealistically low limits on arterial routes create an unnecessary extra burden for the Gardaí tasked with enforcing them, thus diverting enforcement efforts from genuine high risk locations.



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Measure ROAD 2:

The Authority will seek:

- (a) The protection of an Eastern Bypass route corridor for a possible future transport scheme that may be implemented after 2030; and*
- (b) The provision of a new road link from Dublin Port Tunnel to the Poolbeg area, subject to feasibility and economic assessment.*

Measure ROAD 3:

The Authority will seek:

- (a) The finalisation of the route corridor for an appropriately scaled Leinster Outer Orbital Route and its protection from development intrusion; and*
- (b) An incremental approach to the delivery of the project, with partial development only during the Strategy period targeted at addressing deficiencies in the existing road network in terms of road safety or congestion.*

MAG supports the proposals in **ROAD2** and **ROAD3** for new routes to the east and west of Dublin, however notes that where tolling is implemented, motorcycles should be exempt (as is custom at the East Link currently) due to the reduction in traffic throughput where a motorcyclist must remove and replace PPE for the purpose of finding cash and paying tolls at the booths. This can create unreasonable delays for following traffic of all modes. Given that motorcycle tolls are typically half that of a private car, and account for approx 2.4% of traffic [Dublin Canal Cordon Count 2009] the financial impact of tolling, or not tolling, motorcycles comes to approx 1.25% of the overall turnover.

Measure ROAD 4:

The Authority will;

- (a) Prepare a programme for prioritisation of road space and traffic signal priority in favour of walking, cycling and public transport in the Greater Dublin Area, based on the road user hierarchy and need, in a planned manner that recognises the competing demands for scarce road capacity (See chapter 9 "Walking and Cycling" and Chapter 10 "Public Transport"); and*
- (b) Seek the identification and implementation by local authorities of appropriate measures in locations or areas identified by the above programme.*

MAG Ireland broadly supports prioritisation of Public over Private Transport options proposed in **ROAD4** noting that we have certain issues [previously highlighted] with the "road user hierarchy" as proposed. Of concern is that implementation has the potential to be fragmented should local authorities priorities and policies differ substantially.



Measure ROAD 5:

The Authority will:

- (a) Identify a network of roads essential for strategic traffic movement in its forthcoming strategic Traffic Management Plan. Motorways and National Primary Roads outside the M50 will form the core of this network (see Figure 11.1);*
- (b) Seek the management of this strategic road network to:*
 - (i) Protect and enhance the person-trip capacity of the network;*
 - (ii) Prevent inappropriate development or access arrangements from eroding capacity, safety or smooth traffic flow on the network;*
 - (iii) Operate the network to its maximum efficiency having regard to the balance to be achieved across the various transport modes;*
 - (iv) Provide reliable journey times and network resilience when incidents arise (e.g. accidents or other disruption);*
 - (v) provide priority where needed to modes higher in the road user hierarchy; and*
 - (vi) Expand the use of ITS (intelligent Transport Systems) technology to enhance operational efficiency and driver information.*
- (c) Support the declassification of national roads inside the M50 C-ring to regional road status except for the Dublin Port Tunnel and a route serving Dún Laoghaire Port.*

MAG Ireland supports the proposals in **ROAD5 (a)** and **(b)** noting that the Dublin Canal Cordon Traffic Count 2009 shows an average occupancy of 1.22 per car - leading to an interpretation that PTWs are as efficient in the person-trip space while occupying a significantly reduced road area and weighing approx 16% of a 4-seat car.

MAG Ireland, however, cannot support **ROAD5 (c)** as it opens the current N-Road network to the whims of local councils with regards both maintenance and the application of appropriate (or inappropriate) speed limits. Along with this, MAG Ireland notes that designated N-Roads form a vital arterial network designed for all-Ireland traffic, not simply within the GDA.

Measure ROAD 6:

The Authority will support the National Roads Authority and local authorities in providing:

- (a) Clear, consistent direction signage for road users, particularly on the strategic road network and approaches; and*
- (b) Timely information on road travel conditions and parking availability at appropriate points on the road network, and the open dissemination of this information to the public and third party information providers.*

MAG Ireland supports the measure Road 6 as outlined.



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Measure ROAD 7:

The Authority will seek the development and implementation of arrangements to reduce traffic disruption due to maintenance or utilities works in the Greater Dublin Area, including:

- (a) The operation of a comprehensive road works permit system throughout the Greater Dublin Area;*
- (b) Increased co-ordination and monitoring of roadworks activities;*
- (c) The application of suitable charges (e.g. 'lane rentals') to encourage minimal occupation of road space during construction or maintenance activities on key roads;*
- (d) The levying of appropriate penalty provisions on contractors for nonperformance, such as over-running roadworks or unsatisfactory road reinstatement; and*
- (e) The preparation of incident and event management plans (including provision for emergency services) for unplanned (emergency) roadworks, incidents and events to minimise the amount and extent of disruption.*

MAG Ireland broadly supports the proposal as outlined. MAG Ireland believes that any monitoring process such as outlined in (b) above should have a PTW safety element. For example, it is crucial that where temporary covers are applied to roadworks, the provision of a non-slip surface flush with the surrounding roadway is provided to ensure adequate grip for vulnerable road users such as cyclists & motorcyclists.

MAG Ireland strongly supports the proposal of (d) above, but note that such provisions must be rigidly enforced to ensure compliance - especially in the initial stages.

Measure ROAD 8:

The Authority will seek the inclusion of detailed arrangements for on-street parking, loading and unloading in local Traffic Management Plans.

MAG broadly supports this measure with the proviso that cycle and PTW users are adequately provided for. In the *Dublin City Draft Development Plan* the recommendation is that 4% of parking be allocated to PTW users.

Measure ROAD 9:

The Authority will seek more effective enforcement of traffic regulations and laws, and support examination of the use of technology and measures and legislative changes as required, to assist in achieving improved compliance with regulations.

MAG Ireland is broadly in favour of of this measure, however our view is that increased enforcement of traffic regulations and laws should be by way of increased numbers of Garda Traffic officers rather than by automated methods.



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Measure ROAD 10:

The Authority, working with Gardaí, the Road Safety Authority, the National Roads Authority

and local authorities will:

- (a) Identify road accident locations in the Greater Dublin Area where cost-effective engineering measures can beneficially contribute to improved safety and seek the implementation by local authorities of appropriate accident remedial measures at these locations, and monitor their impact, with a view to improving the effectiveness of accident remedial interventions over time;*
- (b) Support road safety campaigns and public information programmes, targeting all road users including schoolchildren, and training for drivers of larger vehicles in built up areas;*
- (c) Seek enhanced enforcement, particularly of speed limit or traffic light regulations, at identified accident locations; and*
- (d) Support changes in HGV design to improve cyclist safety, including provision for vehicle sideguards and side mirror lenses that reduce cyclist blind spots for HGV drivers.*

MAG Ireland are committed to road safety, and as such fully support the above measures. We however caution (as previously) that inappropriate speed limits do nothing to encourage compliance where the limits are warranted. As such we would recommend that re-engineering and enforcement campaigns be focused on areas with proven problems in relation to road safety.

Measure ROAD 11:

The Authority will:

- Support the provision of electric vehicle charging points on-street, at park and ride sites and elsewhere as appropriate in the Greater Dublin Area;*
- Support greater use of electric taxis and goods vehicles, especially in urban areas; and*
- Support training and provision of information in relation to 'eco-driving' techniques.*

MAG Ireland support the introduction of charging facilities for electric vehicles, noting however the objective in Measure **WCY5** to reduce on-street clutter for the benefit of pedestrians. Training in eco-driving techniques should be encouraged, especially as they encourage motorists to be significantly more aware of the entire situation around them.



Freight Measures

MAG Ireland broadly supports the Freight measures **FRT1** through **FRT7**. We consider the proposal to encourage freight forwarding depots and the mention of Freight Bikes to have considerable potential for adoption by the commercial PTW user base.

Measure FRT 2:

The Authority will:

- *Seek the extension of the current Dublin City HGV Management Strategy to include 4 axle vehicles;*
- *Evaluate the potential for the Dublin City HGV Management Strategy to:*
 - *Be further extended to other vehicles types;*
 - *Have an expanded exclusion area; and to*
 - *Encompass vehicle emission parameters;*
- *Examine the potential of introducing HGV controls in other town centres.*

MAG Ireland does have concerns about the extent of the proposal in **FRT2**

- *Evaluate the potential for the Dublin City HGV Management Strategy to:*
 - *Be further extended to other vehicles types;*

These concerns extend both to the types of vehicles to which any such "Management Strategy" would apply, and to the existence of a viable alternative for all users of said modes **prior** to the adoption of any management measures.

Measure FRT 3:

The Authority will:

- *Seek the introduction of arrangements to promote deliveries in Dublin city centre and, if appropriate, in other towns, between the hours of 7p.m. and 7a.m., taking into account the rights and needs of residents living in these areas;*
- *Promote the development and operation of Distribution and Servicing Plans for freight intensive developments, which will focus on creating efficient delivery and servicing processes that reduce the congestion impacts associated with the development;*
- *Seek the development of a pilot urban delivery centre in the Dublin area for the disaggregation of large loads and the consolidation of small loads for final delivery by van type vehicles in Dublin City Centre and surrounding areas; and*
- *Support the use of low impact delivery schemes in Dublin city centre and other town centres, for example by using smaller quieter vehicles, with lower emissions, including the use of cargo-bikes and examining the potential for certain freight deliveries by tram.*

MAG Ireland is happy to support the majority of proposed measures in **FRT3**, however we are concerned about the commercial implications of limiting deliveries in town centres to the hours of 7pm to 7am. Many smaller business, non-retail in particular, rely on same-day day-time deliveries of documents and smaller parcels.



Measure FRT 4:

The Authority will promote the use of low emission freight vehicles, including electric vehicles, throughout the Greater Dublin Region and specifically in the urban areas.

MAG Ireland does not consider electric vehicles to be low emission vehicles since the electricity used to power them comes almost entirely from burning fossil fuels and thus the carbon footprint is simply displaced to the electricity generators.

Travel Demand Management

MAG Ireland has a number of issues with the proposals in the Travel Demand Management portion of this consultation document. Not least with one of the underlying assertions that demand can be regulated by ensuring housing and employment centres be near each other ("better planning of homes relative to jobs"). In the current economic climate, this is a complete fallacy as many homeowners are in no position to change their house in response to a change of job. The assertion also fails to recognise that job location is not an overriding factor in many home location decisions, where a longer commute is often the price people are willing to pay for a better quality of home-life, relative proximity to family and support networks, and where children are involved, the proximity of schools and other social infrastructure.

Measure TDM 1:

The Authority will evaluate the feasibility and potential benefits of the following measures to manage travel demand on roads in the Greater Dublin Area, and where appropriate seek their implementation:

- *Ramp Metering, variable speed limits or hard shoulder running on dual carriageways or motorways, at times and places where congestion on these strategic roads is affecting journey time reliability and disrupting traffic flows;*
- *Dedication of traffic lanes to particular transport modes such as public transport lanes or freight lanes on certain roads, in addition to bus priority provision where appropriate (see section 11.3.2); and*
- *Introduction or expansion of local authority on-street parking controls that seek to reduce commuter parking.*

MAG Ireland strongly objects to general road tolling measures (such as Ramp Metering) without directly related reductions in (or indeed the elimination of) the existing motor-tax regime.

Mag Ireland does, however, see merit in the concept of mode-dedicated traffic lanes, however the detail of any such proposals would require significant further analysis.



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Measure TDM 2:

The Authority will:

- *Support the introduction or expansion of charging for on-street car parking in areas where space is scarce and charging contributes to parking turnover; and*
- *Support the introduction of a levy on off-street parking spaces at town and employment centres and out-of-town retail developments subject to evaluation of feasibility and benefits and any necessary legislative change.*

MAG Ireland takes issue with any further expansion of on-street parking restrictions where PTWs are excluded from the planned allocation of spaces. Furthermore, MAG Ireland regards the taxation of private off-street parking spaces in centres of employment as contrary to the economic viability of the Greater Dublin Area, significantly increasing the cost of doing business in what is already a tough economic climate.

Measure TDM 3:

The Authority will:

- *seek the introduction of a road use charging scheme over a large geographic area of the region prior to 2020;*
- *Decide on the exact format of the road use charging scheme, including the structure and level of the charges, the area to which they are to be applied and the hours of operation, under the Implementation Plan arrangements;*
- *Undertake extensive stakeholder and public consultation in the development of the scheme;*
- *Consider the extent to which the net revenues from a road use charging scheme can or should be assigned to, or re-invested in, public transport improvements and operations; and*
- *Consider the introduction of a pilot charging scheme on an individual road corridor, or corridors, in conjunction with the provision of public transport improvements on that corridor.*

MAG Ireland is concerned that this is being presented as a "fait accompli" - that road charging is not up for question.

MAG Ireland strongly opposes road charging as an unjust levy on the disadvantaged members of society, forced during the boom times to relocate significant distances from their places of work for reasons of cost, now to be penalised for inability to change job location or move home, regardless of their current mode of transport.

Measure TDM 4

The Authority will support and facilitate the introduction of:

- *Workplace travel plans for all large employers in the Greater Dublin Area;*
- *Residential travel plans in a phased programme over the Greater Dublin Area;*
- *School travel plans for all schools in the Greater Dublin Area;*



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- *Car club schemes, and their future expansion if successful; and*
- *An all-island car sharing website.*

MAG Ireland notes that the SME sector is the major employer in the greater Dublin Area, with large firms (over 500 employees) being a significant minority of overall employment (FORFAS figures from 2006 suggest that nationally, 42% of all workers are employed by SMEs with fewer than 250 employees). That said, MAG broadly supports the objectives of **TDM4** while noting that the final two objectives are complicated by current insurance practices, and may lead to a reduction in overall road safety, brought about by “occasional drivers” with little formal training and less experience.



Chapter 12 Expected Outcomes

This chapter presents the results of the appraisal of the Strategy. It looks at the key objectives and sub-objectives and summarises the expected outcomes.

MAG Ireland draws attention to the following comments made by the NTA:

Under the assessment of section 1.3, there is a line which reads "However, the Hinterland

Towns remain highly car dependent (over 70% of inbound trips); and these will face a negative impact from road use charging, while gaining much improved journey times ."

Then under section 1.4 we read; *"All inter-urban bus routes become faster; and data suggest a 24% fall in car mode share for such AM peak trips that would be strongly affected by the road use charge."*

Next, under section 2.1 there is a line which reads; *"Freight trips on the strategic network benefit greatly from reduced congestion, with a 15% fall in vehicle-hours for HGVs in the AM peak. This is likely to be carried through to other periods if charges remain in place at all times."*

While shortly afterward, under section 2.3 there is a line which reads *"Planning measures can both reduce demand for travel and ensure more of it takes place by sustainable modes. The Strategy shows car demand decreases by 15%; however all vehicle hours (car plus HGV) fall by 35% and kilometres travelled decrease by 31% – indicating that vehicle trips (especially by car) become shorter. This is also associated with the distance based road user charge."*

And in the same section; *"The greater levels of public transport use require provision of additional fleet so that peak overcrowding does not become intolerable – if this fleet cannot be adequately utilised at other times, the costs may result in an additional burden of subvention. Road use charging revenues could be used to cover this, as well as potentially to offset cost of better road maintenance and the higher levels of traffic management proposed in the Strategy."*

MAG Ireland notes a common thread of road user charging for private vehicles, and we believe this exposes the true motives of the NTA.

What then will this blatant persecution of the private vehicle user achieve?

According to the NTA *"The Strategy delivers a substantial decrease of 7% in average public transport journey times between 'business clusters' (locations with the highest numbers of jobs) – though there is a marginal increase in car journey times for these trips and a 17% rise in HGV journey times.*



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Overall, however, the Strategy provides the largest benefits for car users travelling from home to access jobs at these business clusters – a 22% drop in journey times.”

In comparison the equivalent reduction for travel by public transport to these locations is 1%, though this in part reflects longer average trip lengths by public transport as network coverage improves and public transport claims a larger mode share.”

Ultimately, MAG Ireland believes that the traveling public, regardless of mode, deserve better than the blinkered approach displayed by the NTA throughout the strategy. We believe that the strategy document itself contains a number of flaws and omissions, and we again highlight the failure of the NTA to recognise the modal distinction of PTWs throughout.

MAG Ireland opposes any general use of road tolls in this country, however implemented. MAG Ireland believes in the fundamental right of the Irish Citizen to move around the state unimpeded by tolls.

We believe tolls to be an anachronistic, inefficient means of financing road development and maintenance. They are detrimental to traffic patterns, victimise people whose work involves them in an above average amount of road travel and those who live in rural areas. MAG Ireland knows that road user charging will be vigorously opposed not just by ourselves, the AA and the Road Haulage industry etc., but by the traveling public in general.

In summary, it is our belief that this proposed strategy document is seriously flawed due to the aspirational beliefs of the authors of the document, and does not reflect the reality of the situation.

MAG Ireland feels that any merit in the document is drowned by the bias of the strategy against private road users.



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Chapter 13

Next steps

Chapter 13 sets out the next steps, intended to be taken after the final strategy has been approved.

MAG Ireland notes that the NTA is required by law to deliver an implementation plan within 9 months of Ministerial approval of the strategy.

MAG will be making representations to the Minister outlining our reasons why we believe this strategy should not be adopted in its current form. MAG will seek to have the rights of all road users recognised and acknowledged as part of a truly inclusive strategy that accepts the realities of life in the GDA region for public and private transport users alike. MAG Ireland will continue to push for the recognition of the modal distinction required to segregate the PTW from twin track vehicles.

Submitted by MAG Ireland,

Gearóid O Byrne
Chairman
MAG Ireland

6th April 2011