

Submission to the Consultation on Moving Together: A Strategic Approach to the Improved Efficiency of the Transport System in Ireland

Feminist Communities for Climate Justice

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Fuinneamh
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This submission has been prepared by *Feminist Communities for Climate Justice*, a joint project between the National Women's Council of Ireland and Community Work Ireland.

National Women's Council

The National Women's Council of Ireland (NWC) are the leading national representative organisation for women and women's groups in Ireland, founded in 1973. With nearly 200 members, the ambition of the National Women's Council is an Ireland where every woman enjoys true equality and no woman is left behind. NWC's current Strategic Plan No Woman Left Behind prioritises the need for NWC to bring a new focus on the climate crisis, its impact on women, the need for a Just Transition and the need for women and women's organisations to play a more central role in development of policies and solutions to meet the challenge of our climate crisis.

Community Work Ireland

Established in 1981 as the Community Workers Co-operative, Community Work Ireland (CWI) is a national organisation that promotes and supports community work as a means of addressing poverty, social exclusion and inequality and promoting human rights. CWI has a membership base of almost 900 community workers and community work organisations working with the most marginalised communities throughout the country. CWI has been involved in the area of climate justice since 2010.

Feminist Communities for Climate Justice

Feminist Communities for Climate Justice campaigns for climate justice that reflects feminist and community work values. We mobilise communities, ensuring social inclusion and equality are central to climate policies and programmes. This partnership between the National Women's Council (NWC) and Community Work Ireland (CWI) amplifies the voices of women and marginalised communities that are most impacted by climate change, building momentum in communities to engage, understand and influence climate policies. Feminist Communities for Climate Justice will develop a feminist and community work analysis, is delivering an accredited training programme in partnership with the Department of Applied Social Studies at Maynooth University, has established a Feminist Communities for Climate Justice National Network, and will develop resources and campaigns around feminist climate justice.

We would also like to thank the following groups for their collaborative contributions to this submission:

COPE Galway

COPE Galway is a Galway charity with a vision of a community where every person is valued, cared for and supported at every stage of life. They provide essential support services for people who are homeless, women and children experiencing domestic abuse and older people. COPE Galway work together with community partners, groups, businesses and individuals, to help some of the most vulnerable and isolated men, women and children in Galway. The services they offer include homeless services for individuals and families; domestic abuse services for women and children; and senior support services for older people in need of support.

Comhdháil na nOileán (Ireland's Offshore Islands Federation)

Founded in 1984, Comhdháil na nOileán brings together the sixteen inhabited offshore islands of Ireland, aiming to draw attention to the difficulties facing islanders in terms of socio-economic development, problems which they feel are not being addressed at either a regional or national level. The greatest concern expressed by communities in all of the member islands is the decline in their populations. Halting or indeed reversing that trend requires work on a number of fronts: improvements in access; attractive, sustainable development; adequate, appropriate housing; and support for new, sustainable enterprises. Comhdháil na nOileán also works to ensure that adequate health, education, waste management, childcare and social services are provided on the islands.

Comharchumann Fuinnimh Oileáin Árann Teoranta (Aran Islands Energy Co-op)

Comharchumann Fuinnimh Oileáin Árann Teoranta are a community owned energy cooperative on the Aran Islands at the mouth of Galway Bay. The residents of the three islands are working towards becoming self-sufficient in locally generated renewable energy and free of dependence on oil, coal and gas as soon as possible. They take a bottom-up approach where citizens in the local community take power into their own hands. Renewable energy sources like wind, water, and light are available to islanders locally, and they aim to harness them for their own community needs to create a citizen's revolution where power reverts to the locality and is taken away from the big corporations.

Moving Together:

The aim of the draft Strategy ‘Moving Together: A Strategic Approach to Improving the Efficiency of Ireland’s Transport System’, which is a commitment in the Climate Action Plan 2023 (CAP23), is to provide an agreed strategic direction for making Ireland’s transport system more efficient and for alleviating the impacts of car-dependency and congestion on the economy, the environment and the health of society. The draft Strategy and Implementation Plan along with supporting documentation can be found [here](#).

The Department of Transport launched this public consultation to get the public’s views on the draft documents including the overall approach, the level of ambition, any concerns and the likely effectiveness if implemented as per the draft Plan. This consultation is an opportunity for members of the public and key stakeholders to provide their views on the contents of these documents prior to approval by Government and final publication later in 2024.

The following is the project’s responses to the list of questions posed by the Government’s consultation form.

Objectives and Vision of Moving Together

What are your views on the overall vision and objectives for the draft Strategy?

Moving Together is largely a very promising and ambitious strategy that repeatedly stresses the need for equity, accessibility and a just transition – to ensure everyone can move to green transport actions on a level playing field. The strategy also claims to use a gender lens.

However, some gaps were identified in our analysis of the draft strategy which we will be raising in our submission and would like to discuss with you today. They are:

- Outright omission of the Traveller community
- A need to capture data on caring journeys on active transport
- Further measures to protect women, particularly for victims of violence against women (VAW)
- Omission of experience of people living in isolated areas where Direct Provision centres are located
- Omission of inhabitants of Ireland's off-shore islands

We welcome that this Strategy will incorporate a wellbeing approach to the monitoring and evaluation of its implementation, instead of traditional metrics like Growth Domestic Product (GDP) which will also signal the multiple areas of life that transport can impact.

Is the level of ambition sufficient to deliver the level of change required?

- The draft strategy's ambition is largely promising, specifically the attention to ensuring a just transition for all within transport and taking equitable access to active transport modes as a priority. We welcome the strategy's insistence that changes from the top-down alone will not create the necessary conditions for the transport transition, and that communities, private businesses and local authorities also have an important role to play.
- As stated by the strategy itself, the level of change required "translates to reducing the mode share of daily car journeys from over 70% to circa 50%, in parallel with an increase in daily public transport journeys by 130%, and an increase in daily active travel journeys by 50%." It is disappointing to see then, with such an unprecedented scale of change needed, that one of the strategy's sub-groups, "*did not agree to the widespread introduction of 'free public transport', given that encourages a shift from active travel modes to public transport use for short journeys,*" especially when the National Household Travel Survey (NHTS) shows that approximately 68% of all trips taken nationally are for distances of less than 10km, with 35% of all trips below 3 kilometres. The draft strategy also notes that, "*Measures which reduce barriers to cycling are unlikely to suffer from the risks associated with providing 'free' public transport.*", which illustrates that more affordable or free public transport would not actually encourage a shift away from active travel modes as foreboded. Even where free public transport exists for some groups within the population, the private

car is chosen as a travel mode. For example, older people are one of the groups in Ireland entitled to the Free Travel Scheme – despite this, however, there are a number of older people who will choose to use a private car instead, along with the associated costs of car ownership. Some deterrents to public transport use for older people include lack of infrastructure (such as bus shelters) or poor connectivity for the last-mile of a journey. Poor synchronicity for multi-modal travel, such as a train arriving too late to get a planned bus afterwards, was also cited. This illustrates that poor public transport infrastructure means that free public transport is not leading to public transport use for short journeys – it is leading to prolonged private car use. Dedicated research should be conducted on cohorts who are entitled to the Free Travel Scheme, but are not using it.

Further fare reductions, at the very least, should be considered in tandem with the expansion of public transport infrastructure and removal of barriers to efficient operations – particularly as the current 20% reduction in public transport fares have yielded positive results. Short journeys on public transport should be seen as a positive transitional step away from short journeys by private car.

- The strategy's ambition to consider issues of gendered transport use is welcomed – however, we believe that this can be bettered through capturing data on caring journeys taken via active transport modes. Whilst it is positive to see caring trips and those with caring responsibilities noted as journeys with unique mobility needs, the data gap on caring journeys in Ireland needs to be filled, and should be included as a Recommendation of the strategy similar to Recommendation 33 (Develop a National Parking Data Inventory) Ensuring that active transport modes suit caring trips is crucial as women simultaneously are less likely to own cars and are higher users of public transport, including higher rates of multimodal travel. Despite this, the majority of women in Ireland see car ownership as a necessity due to caring duties. This is because existing public transport infrastructure has poor compatibility with caring journeys, with research carried out by Kaufman et al. finding that women – particularly those with caring duties – pay a 'pink tax' on transport due to this poor compatibility.

Many caring trips are not sufficiently accounted for in datasets – they might be 'hidden' under other headings (like leisure or education) or outright excluded due to falling outside of minimum trip lengths for inclusion in datasets (such as those under 1km). There is no uniform category for caring trips, with many of them instead siloed under categories such as escorting, shopping or errands as separate, unrelated trips when they all likely fall underneath the umbrella of caring journeys. This means caring journeys are underrepresented in transportation data, and therefore our transport infrastructure. The NHTS, which the draft strategy sees as an assessment metric, also fails to appropriately acknowledge caring journeys, with trip reasons categorised under work/business; education; shopping; social; return home; personal; and all others. Care itself is only mentioned within the latest NHTS (2022) within Appendix A and Appendix B, where individuals completing the Travel Diary and/or Household Questionnaire could indicate their occupational group (as a full-time caregiver or caretaker under Semi or unskilled manual work). If the NHTS does not recognise caring journeys, then the finalised strategy will fail to

take these journeys into account when informing our future public and active transport infrastructure.

Is there more that can be done to achieve the objectives and if so what further recommendations would you suggest?

- The data gap on caring journeys in Ireland needs to be filled, and should be included as a Recommendation of the strategy similar to Recommendation 33 (Develop a National Parking Data Inventory). Caring journeys should be added as a category in key data documents related to transport, such as the NHTS and the Census. This would allow collection of data on care-related travel for the first time, meaning that design of transport infrastructure could be informed by caring journeys as the green transport transition continues.
- To ensure a fully Just Transition, the draft strategy must address the unacceptable absences of the Traveller community and migrants and people seeking asylum, all of which are socially excluded groups who face additional barriers to participating in the transport transition.

Many Traveller halting site locations are in close proximity to dual carriageways, creating safety concerns and barriers in opportunities for active travel. Additionally, an absence of public transport, pedestrian lighting and lack of public footpaths or lighting place Travellers of all ages in danger when walking to school, shops or recreation facilities. Many halting sites are also located at the outskirts of towns or cities, far from amenities and access to public transport. Living on isolated sites beyond walking distance from services can make it impossible to travel to health appointments during the day. This results in Travellers becoming Captive Car Users – a group the strategy gives special attention to. Travellers are not noted as Captive Car Users despite the additional attention given to ensure a just transition for this group within the strategy.

It is also very disappointing that despite Air Quality being a key assessment metric for the Strategy, the disproportionate exposure of the Traveller community to air pollution has not been identified. The European Environmental Agency (EEA) have shown that the impacts of air pollution are unevenly distributed across the continent, with minority ethnic groups and those socioeconomically disadvantaged noted as being more affected by air pollution. Children are also particularly vulnerable to air pollution due to their still developing respiratory systems, with tailpipe emissions from cars identified as a key contributor. Traveller children are not only exposed to the typical engine idling found at schools, but also to the emissions that result from close proximity to dual carriageways. The All-Island Traveller Health Study (AITHS) documented a child asthma rate of 70% in Traveller children reporting a current health problem, making disproportionate exposure to air pollution a compounding of existing health inequality for the Traveller community. The proximity to roads also means that noise pollution is an issue, noted by the draft strategy as the second most significant environmental cause of ill health in Western Europe and proposed as a metric of assessment for the strategy under Noise Action Plan Health Assessments.

It is disappointing to see that the experiences of those within the Direct Provision accommodation system are not mentioned once within the draft strategy. The experiences of migrants and people seeking asylum are also absent from the draft strategy, despite the social exclusion that they can face. The Government of Ireland operates a one size fits all 'dispersal and direct provision' (DP) accommodation system for International Protection applicants, which means that people are placed into locations throughout the country with little or no links to active travel modes, particularly public transport. Some centres are in isolated locations which affects access to transport hubs and connections; access to support services; and access to and from Dublin, where the two International Protection Accommodation Service (IPAS) locations are located. Residents must travel to these services for appointments related to their asylum application, meaning that some may be carrying out long journeys (such as from Donegal to Dublin) with limited access to transportation modes. It is welcome to see expedited and increased bus services in some areas in response to the transport needs of those in DP centres – these responses should be scaled up and distributed nationwide to ensure there is equitable access to public transport. Limited freedom of movement due to location can be further compounded by financial constraints of DP system, particularly the current rate of €38.80 per week to budget for bus tickets, food, clothes, a phone to connect and communicate.

Recommendation 1 of the draft strategy emphasises the need for policy alignment and implementation mechanisms to strengthen compact growth and reduce travel demand as a result. This must extend to the planning of the International Protection accommodation system, and the multi-state and multi-sector engagement encouraged by the draft strategy must incorporate the IPAS. The IPAS is not mentioned within the draft strategy, which has implications for ensuring a just transition in transport for those seeking asylum in Ireland. The decision where one lives is not guaranteed for refugees or people seeking asylum, who tend to live in degraded neighbourhoods with poor access to or poorly maintained green spaces and recreational facilities. This can include high levels of air pollution, which the draft strategy considers a metric of its assessment. As previously stated, the EEA have shown that the impacts of air pollution are unevenly distributed across the continent, with minority ethnic groups and those socioeconomically disadvantaged noted as being more affected.

- It is very positive to see the Dept of Transport's actions within the DSGBV (Domestic, Sexual and Gender-Based Violence) Implementation Plan 2024 mentioned within the draft strategy and that the strategy commits itself to using a gender lens in its recommendations, recognising that safety can be a barrier to women using active transport modes. However, there is potential for this draft strategy to go further in ensuring the safety of women using active transport modes, particularly those impacted by violence against women (VAW). For victims of VAW, reliable modes of transport are incredibly important – transport might be used to access supports, attend court proceedings or travel to refuges. Crucially, transportation modes are also important parts of escape routes from perpetrators of VAW, meaning reliable transport can be the difference between escaping to safety or remaining in danger. This should be emphasised for victims of VAW in rural areas, where women are less

likely to have access to a car but more likely to face infrequent or inaccessible public transport infrastructure. Poorer access to a car is also more likely for Traveller, Roma and disabled women in rural areas. One key action to better facilitate access to active transport modes for victims of VAW is to extend the Free Travel Scheme to those fleeing DSGBV, as has already been done in Northern Ireland. It is important that the voices of those who have been impacted by or work in combatting VAW are included in the draft strategy, and we recommend that actions and measures in the design of our active transport infrastructure are co-created with them.

Safe, frequent and reliable public transport networks are important for ensuring women's full participation in economic, social and political life. Employment opportunities for women improve with good access to safe transport; contrastingly, bad or traumatic experiences on transport can leave women unwilling to use those transport modes again, with resultant exclusion from employment, education and social events. This includes modes of active transport such as walking and cycling. There are Recommendations the strategy could make for employers in particular which could help female employees who feel unsafe going to or from work, particularly to potentially add to existing outputs/outcomes of Recommendation 27 (Strengthening focus on transport/mobility related dimensions of corporate sustainability requirements). Unite the Union's 'Get ME Home Safely' campaign centres on the issue of female workers who do not feel safe going and from their workplace, and a number of their recommended actions for employers could be replicated in this draft strategy, including extending employers' duty of care to embed safe transport home policies for all workers, ensuring employers to adopt risk assessments that include an individual's journey times and potential hazards once they've left the workplace; making the creation of a 'safe home' policy a prerequisite for all new alcohol licenses, including transport home for staff; and identifying workable solutions to facilitate safe travel home, such as getting supplemented taxi travel for late shift workers.

We would also advise the creation of a Recommendation similar to Recommendation 30's focus on communications for consumers/users of public transport to roll out an awareness-raising campaign of how to identify, tackle and report cases of sexual harassment/assault on public transport in order to better create a zero tolerance approach. Finally, we would advise creating a new Recommendation which would ensure that there is compulsory training on sexual harassment/assault for all workers in passenger transport modes so that they can identify, tackle and report cases where it occurs on buses, trains and LUAS.

- While it is welcome to see the mobility needs of older people mentioned in the draft strategy, as well as the issue of physical distance from public transportation for older people discovered in Census and Transport for Ireland data, the strategy could go further in noting and addressing the impacts of poor public transport access for this cohort. Recent research has identified Ireland as the loneliest country in the European Union, with 5,300 older people in Ireland saying they were lonely in 2023. Loneliness has been linked to multiple chronic health issues – Canada attributed 45,000 deaths to loneliness in 2023 – and the World Health Organisation (WHO) has declared it a pressing health threat. This issue becomes gendered when taking into consideration that women live longer than men in



Ireland. It is imperative that access to public transportation for older people is enhanced to improve opportunities for community participation and socialisation. This means that existing local transportation services such as Local Link buses must be timetabled to serve needs beyond a work-home commute, ensuring that services are compatible with social outings. Communities might also be encouraged to develop intergenerational car-share schemes, where younger drivers in the community could bring older people to community and social events. This way, active travel modes could be promoted not only as sustainable, but as socially valuable work to foster a greater sense of community and to prevent ill health associated with loneliness.

- It is crucial that Ireland's offshore islands are not left behind in the transport transition – the National Development Plan (NDP) 2021-2030 recognises that good transport services and a developed infrastructure are important prerequisites for maintaining island populations, and that transport access for island populations impacts on every aspect of island life, including health and welfare services, education, employment, social and family life, and business. It is therefore disappointing to see Ireland's offshore islands entirely absent from the draft strategy, an absence which should be rectified in the final strategy. Our Living Islands, the Government's National Islands Policy, states that affordable, frequent and safe transport services, by both sea and air, and safe piers and airstrips, are vital to island communities. They provide links to the mainland without which islanders could not survive.

Whilst transport for inhabitants of Ireland's offshore islands (hereafter referred to as 'islanders') is subsidised, this can become more challenging when travelling from the mainland back out to the islands – travel providers on the mainland have no way of proving an individual's islander status, and as a result islanders can be charged the more expensive tourist fares to return home. This issue can also occur when booking hotels on the mainland, which used to have discounted rates for islanders – where these rates still exist, again, the issue of attempting to confirm islander status means the regular hotel rate is charged. This can intersect unfavourably with the previously named issue of victims fleeing GBV, where islanders can find the cost of an escape route go far beyond what they had originally planned for.

This issue could be remedied with a Residents Fare Card for islanders, similar to the scheme introduced in Scotland for inhabitants of Barra, Vatersay, Coll and Tiree in late 2023. Those who have an eligible residency status can apply for a card with a unique number and PIN which guarantees lower fares when travelling by plane to the mainland. The introduction of this scheme in Ireland would ensure that islanders do not pay tourist rates on ferries to and from the islands, particularly when travelling back from the mainland.

Islanders are also not mentioned as unique Captive Car Users who often need to own two cars – one for island travel, and one on the mainland for travel there. Whilst cars on offshore islands do not require a National Car Test (NCT), this often results in higher insurance rates for island cars. This is on top of the costs associated with car ownership of two vehicles such as taxation, fuelling and maintenance. 'Islandproofing' of actions for reducing demand for private car use must be a priority for this strategy to pursue its goals of just transition in transport.

Bringing children to school can be challenging and expensive for islanders, particularly for those who live on islands without a school on them, such as Sherkin. The cost of sending a child to and from school every day on a ferry can amount to €50 a week, not including costs after disembarking at the ferry port. This cost becomes more significant when taking into account that at least one parent must travel with the child to school due to these barriers, meaning that in two-parent families at least one parent will not be able to take up full-time employment to enable this – for lone parent families, this means a lone parent will not be able to take up full-time employment to provide for their child(ren). For some islander parents who wish to collect social welfare payments such as Child Benefit to help with these costs, there can be a further barrier when there is no post office on the island, and they must travel to the mainland to collect them. Collection of social welfare payments for older people (such as the state pension) or disabled people (disability allowance), who may have mobility issues and/or be socioeconomically disadvantaged and live on offshore islands, must also be noted as facing barriers due to the cost and logistical difficulties of travel to and from the mainland. These are challenges which must be noted in the final version of the strategy.

Additionally, whilst Freight is noted as a key generator of demand within the strategy, the just transition issue of the additional freight costs that islanders pay to have goods delivered to them goes unaccounted for. It is welcome to see a push for alternative and less polluting fuels for freight modes.

The cultural and historical value of Ireland's offshore islands, as well as its preservation, relies on inhabitants – but habitation of the islands must be financially feasible, particularly in the context of the climate crisis. Communities on offshore islands are tightknit, and islander communities are useful for trialling new green initiatives which can be replicated on the mainland. It is imperative that the final version of this strategy takes the unique transport needs of islanders into account to ensure a just transition in transport for all.

- Innovative 'nudge' schemes can be of benefit when implemented by local authorities to assist citizens in shifting their modes of transport to more efficient and reduced emissions options - there are many international examples to learn from and adapt to a locally relevant version. For example, in Wellington New Zealand the city council encourages car sharing by supplying central dedicated car sharing parking spaces, to encourage their use. There are also some Irish examples of car sharing which could be emulated by local authorities, such as those used by Maynooth University and Galway University for students and staff; and Q-Park's Sustainable Urban Mobility Hub in their St. Stephen's Green facility. Encouraging a diverse range of efficient affordable options is part of the journey to a more active transport system and a broad mix of options can help for a more equitable transition - applying learnings from successful incentive schemes such as these in a locally relevant way can help.

Levels of Responsibility

Is there sufficient balance in terms of the onus/responsibilities being placed on the various actors and implementing bodies mentioned?

- The level of responsibility given to Local Authorities will require a consistent suite of supportive actions and guaranteed funding streams and funded infrastructure, including decentralisation of powers to allow them more agency to act at a local level.
- More onus could be placed on private businesses, including creating Safe Home policies as suggested for vulnerable employees or employees who work early / late.
- As aforementioned, it is of key importance to involve the IPAS in the recommendations of the final version of this strategy in order to enable a just transition for Ireland's asylum-seeking population. Appropriate responsibilities should be created specifically for the IPAS.
- Whilst the aforementioned insistence that changes from the top-down alone will not create the necessary conditions for the transport transition is welcomed, there is nonetheless important work for Government to do in removing barriers to active travel modes and improving the efficiency of existing infrastructure to make it a more attractive, accessible and affordable option for those currently using cars.

Level of Ambition

What are your thoughts on the level of ambition as per the recommendations in Chapter 10? Do you have any views in relation to the outputs or timeframe for achievement of associated actions in the draft Implementation Plan?

- Communication-based recommendations, such as Recommendation 30, must consider that English and Gaeilge may not be the first languages of refugees and people seeking asylum in Ireland. Collaboration should be sought with organisations working with and representing migrants in Ireland to ensure that communications are accessible to all.
- Recommendation 1 of the draft strategy must extend to the planning of the International Protection accommodation system, and the multi-state and multi-sector engagement encouraged by the draft strategy must incorporate the IPAS.
- Creating community-owned and co-produced solutions to reduce transport demand is key to creating acceptance for the scale of change needed in Ireland's transport system – Local Authorities will need to be empowered and upskilled as soon as possible in order to enable such changes. There cannot be any delays in the proposed timelines for Recommendations 3 through 9. Commencement of action on Recommendation 3a should be expedited as priority – leaving action on this as late as Q4 2026 should be seen as unacceptable and to be

avoided at all costs.

- Recommendations 3 through 9 should also ensure that accessibility for migrants and people seeking asylum are taken into account, inclusive of those within Direct Provision.
- Recommendation 25, concerning sustainable mobility supports for primary and secondary school-going children, must ensure that children in Direct Provision are included in its scope. This also underscores the aforementioned importance of engaging and including the IPAS within the draft strategy.

Does the Strategy sufficiently highlight the potential risks, challenges and opportunities associated with the achievement of its objectives? If not, please outline what you think may be missing.

- The aforementioned omission of the Traveller community, migrants and people seeking asylum means that key challenges to creating a truly just transition within transport are unaccounted for. Some of these challenges include connecting all isolated DP centres to public transportation, improving air quality at Traveller housing and halting sites, and addressing the financial constraints for those in DP when accessing active transport modes.
- The omission of Ireland's offshore island inhabitants means that the unique challenges associated with a just transition in transport for islanders are not included in the strategy. This includes reducing the carbon footprint of islanders through introducing less polluting fuels for ferries and planes; the issue of islanders being charged tourist rates for travel from the mainland; the additional cost of freight for deliveries to the islands; the just transition issues for islanders without schools or post offices on the islands they live on; and the unique Captive Car User status of islanders, who often have to own two cars and therefore bear the costs that come with dual car ownership.
- The omission of dedicated data for caring journeys means that the challenges and opportunities in creating active travel infrastructure which caters to such journeys is missing. Collecting this data and using it to inform active travel infrastructure planning would be a positive step towards creating a greener transport system which is also more gender equal in addition to appropriately valuing the contribution of caring work to our society. Transport infrastructure which is more care-compatible would reduce private car journeys taken by women, who see car ownership as a necessity to carry out caring journeys currently – additionally, infrastructure which is care-compatible is also more child-friendly, which would better enable early adoption of active travel modes by children and allow a habit and familiarity to develop into later years of their lives.

Final Thoughts?

Have you any other comments or feedback on the content of the draft Strategy and Implementation Plan?

We welcome this strategy and hope that our suggestions and recommendations will be meaningfully included and implemented.

As the strategy itself notes, travel demand is highly inelastic. This means that individuals will take on additional costs associated with travel rather than reduce travel patterns. With the strategy's key goal being to reduce demand for travel, particularly private car use, to truly ensure a just transition approach actions must be taken with the utmost of care. Those who are Captive Car Users in petrol and diesel cars cannot be punished for having limited to no access to active transport modes or poor electric vehicle charging infrastructure – this must be stressed for Travellers, disabled people and women, who are currently very dependent on private car use but are more likely to be socioeconomically disadvantaged compared to other members of the population.

Gender-proofing, poverty-proofing and equality-proofing of actions ensures that the strategy and its actions have already been assessed for their impact on women disadvantaged by our current public transport system such as lone parents (majority are women), women that are homeless, and rural women and more vulnerable communities. The strategy might consider a suite of targeted actions for groups who have been identified as more vulnerable to transition actions within transport. There is existing practise in offering heavily discounted or entirely state funded green transition processes within Ireland for those on certain social welfare payments, such as the Sustainable Energy Authority of Ireland's (SEAI) Warmer Homes Scheme providing free energy upgrades for households. The strategy might explore offering a similar option with regards to electric vehicles and charging infrastructure, targeting Captive Car Users on social welfare payments or belonging to target groups. These would act as an initial instrument while structural access to active travel modes is improved for all.

Groups such as Travellers, women, disabled people and Captive Car Users should also be involved in the co-creation of actions at the local level and in future transport strategy work.

The collection of disaggregated data is crucial to progress past the current biased metrics which inform transport development in Ireland. Disaggregated data on areas such as gender, ethnicity, citizenship status and disability can inform the creation of an active travel system that truly serves the needs of all and leaves no one behind.

We welcome that the strategy notes that GDP will not be the metric to ensure we create truly universal and accessible modes of active travel for all, and that its proposed metrics for assessment focus on data and wellbeing. The absence of proper data categorisation for caring journeys has already been noted in this submission, which is an essential form of work that also exists outside the scope of GDP. Acknowledgement of caring mobilities within the design of transport infrastructure would make Ireland a trailblazer in creating transport modes that meet the



needs of all, and this draft strategy could initialise such changes through the creation of a metric for assessment that analyses the compatibility of transport modes with caring journeys – with the aim being to improve this until complete compatibility is reached.

Ultimately, the most accessible form of active transport will be universal public transport services. Although the strategy does not agree with free public transport, there are existing examples to show that it can work – Tallinn in Estonia and Hasselt in Belgium are cities which offer fareless public transport, and Luxembourg offers free public transport nationwide. The strategy should, at the very least, suggest that cities or localities attempt trial periods of free public transport to determine viability and public reception.