

## ***Comhar* – the National Sustainable Development Partnership**

### **Transport-related issues under the National Development Plan and the Economic and Social Infrastructure Operational Programme**

#### **Background**

1. *Comhar* recognised at an early stage that the National Development Plan would be a major potential influence for sustainability, and accordingly noted in its work programme its intention to offer advice on the sustainable development profile of the Plan. Unfortunately, we did not have the opportunity to make any substantive input to the preparation of the Plan. This may have been partly a result of *Comhar* being a relatively new body at the time, and thus not fully recognised as having a valuable contribution to make. In the circumstances, *Comhar* decided to undertake an early study of the Plan with the intention of contributing towards the preparation of Operational Programmes. We believe it is essential that the Programmes, which will deliver on the Plan's proposals, ensure that the implementation phase is in accordance with a sustainable development path.
2. We have started this process by considering the transport aspects of the draft Economic and Social Infrastructure Operational Programme (OP). We recognise that sustainable transport is a major area requiring further attention. A number of current trends give cause for concern, including those highlighted in *Ireland's Environment – A Millennium Report*, such as the 54% increase in the total number of vehicles between 1988 and 1998; the 44% increase in the number of persons travelling to work, college or school by private vehicles, and the 6% decrease in the numbers travelling by public transport, bicycle or on foot; and the 58% increase in the number of vehicle kilometres travelled between 1986 and 1996. These trends raise fundamental questions about the environmental sustainability of current transport policy, and raise broader questions about long-term social and economic impacts. These concerns should be seen as part of the background context for this paper, which concentrates on issues arising from the NDP and OP.

### **National Spatial Strategy**

3. *Comhar* welcomes the commitment in the National Development Plan to prepare a National Spatial Strategy, and has contributed initial comments as a first stage in making an input to the development of this Strategy. However, we are concerned that the two year period envisaged for its preparation will mean that both the planning and initiation of some transport infrastructure projects will proceed without benefit of the Strategy. This may be particularly problematic outside the Greater Dublin Area, in the absence of strategic planning guidelines<sup>1</sup>.
  
4. We recommend that, rather than waiting until the end of the two year period to make a final report, the preparation of the Spatial Strategy should include delivering periodic findings which can be taken into account as the OP is implemented. There should be a corresponding onus on the managers of the Programme to ensure that relevant findings are integrated into the process, and that project planning and implementation are adjusted and amended where necessary. Such adjustments should not await the mid-term evaluation of the OP.

### **Environmental assessment**

5. *Comhar* believes that strategic environmental assessment is crucial to ensuring the integration of sustainability into the transport elements of the National Development Plan and the Economic Infrastructure OP. We are concerned that current forms of assessment tend to focus primarily on the economic aspects, and to over-emphasise economic benefits compared to other aspects, or indeed to economic disbenefits. This is particularly the case at the overall level; environmental issues are, of course, included in the formal EIA stage of individual projects. The type of analysis carried out may not always take adequate account of research undertaken in other countries, for example on methodologies for assessing the transport demand, environmental pollution and CO<sub>2</sub> emission implications of road design and road transport programmes. We recommend that planning major infrastructure, including for transport, should always include strategic assessment of all factors, as well as the economic considerations.

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<sup>1</sup> Strategic Planning Guidelines for the Greater Dublin Area were introduced in March 1999.

6. In this regard, we are concerned about the relative weighting which is given to various factors in any strategic assessment. For example, it is not clear to what extent 'the public good' is taken into account as an important consideration in decision-making, as opposed to traditional cost/benefit analysis. Nor is it clear that adequate weighting is given to over-arching 'public good' issues as opposed to sectoral, particularly economic, considerations. Similarly, the relative weight given to environmental, as opposed to economic, considerations in, for example, the overall planning of roads projects, is unclear. We consider that these issues need to be clarified.
  
7. The choice of strategic transport corridors has already been made in the National Development Plan. In the circumstances, we recommend that, insofar as possible, the strategic concerns we have outlined above should be taken on board in the Environmental Impact Assessment (EIA) stage of the individual projects. However, we have some concerns about the stage at which formal/statutory EIA comes into play. In particular, the fact that it is carried out in relation to only one, final option means that alternatives are perhaps not fully considered. It is worth noting that inadequate consideration of alternative options at an early stage in the process has been a contributory factor in the delay of major infrastructure projects, including roads, in the past. We accept that it would be impracticable to carry out a full EIA on all routes under consideration. However, we recommend that full information on the alternatives evaluated be made available in the EIS to facilitate the decision-making process. We welcome the fact that the Environmental Protection Agency is currently reviewing its guidelines on EIA, and suggest that they consider setting out minimum requirements for consideration of alternatives.

### **Roads programme issues**

8. We acknowledge that a good roads infrastructure is vital for balanced regional development, as well as for the economic viability of small-scale rural enterprises, and that the Irish roads system needs improvement, including at local level. We also have concerns about past delays in providing such improvements, and do not wish to exacerbate such delays. However, there are some issues which need to be raised in relation to the proposed roads programme.

9. It has been suggested (by the external evaluators) that there was over-design of roads projects under the previous Transport OP. The National Development Plan may be continuing this trend in recommending motorway/dual carriageway standards for key inter-urban routes. Experience in other countries shows that increasing both roads capacity, and the level of service provided (e.g. comfort, speed, journey time), leads to increased road traffic. We recommend that before decisions are taken on the question of motorway/dual carriageway standards, the implications for environmental impacts and sustainability issues need to be seriously examined and re-assessed, including the needs of public transport and the greenhouse gas emissions from increased road traffic.
10. In addition to the design stage, and especially in the case of projects which have already moved beyond this to construction, issues relating to road use also need to be addressed. Demand management can be an important factor in addressing increasing traffic volumes and their associated emissions and other impacts. However, this needs to go further than conventional instruments such as pricing and parking restrictions, to include also measures such as mobility plans and land use/location strategies. The link with the National Spatial Strategy, and land-use planning in general, is very important in this regard.
11. We strongly recommend that all new roads projects, and also major improvements of existing roads, should assess the needs of cyclists and pedestrians and make provision for both cycle lanes and footpaths, where appropriate. This will not only help to support these more sustainable forms of transport, but add to their safety.

#### **Eco-audit**

12. *Comhar* welcomes the introduction of a pilot scheme for the eco-auditing of policies, and the carrying out of a pilot eco-audit on the National Development Plan. While this is an important first step, it needs to be further developed. The pilot eco-audit of the Plan raised a number of issues and concerns, and we agree that “it will be of critical importance to ensure that the environmental dimension is fully integrated into the further stages of programme planning and into implementation”. We feel there should be a more in-depth analysis of each element of the OP; at a minimum, this

should address quantifiable environmental impacts such as land use, greenhouse gas emissions and acidifying emissions. We support the points made in paragraph 4.14 of the eco-audit (Appendix 4 of the Plan), and in particular support the inclusion of environmental representation on OP Monitoring Committees, and the establishment of an Environment Co-ordinating Committee for the period of the Plan.

### **Integration with National Greenhouse Gas Abatement Strategy**

13. We are concerned at the apparent lack of co-ordination/integration with the national objective of containing/reducing greenhouse gas emissions. The major, and growing, contribution of the transport sector in increased emissions has already been identified as requiring urgent attention. In our submission to the Minister for the Environment & Local Government concerning the draft National Greenhouse Gas Abatement Strategy, we pointed out, *inter alia*, the need for integration of national transport policy with Ireland's obligations under the Kyoto Protocol. We also stated that, in our view, the measures necessary to meet Ireland's commitments under Kyoto were not fully taken on board in the National Development Plan, and that it was essential that the OPs ensure that its implementation is in accordance with a sustainable development path.
  
14. We are concerned that the emissions implications of continued investment in roads improvement have not been fully taken into account. There is insufficient research on the Irish situation, including projected emissions, and a lack of modelling of the specific proposals and their likely impact on emissions. A variety of scenarios need to be modelled, taking account of the potential impact of both road improvements and demand management measures, in order properly to assess both overall policy and specific project proposals. We are concerned that such essential information was not obtained in advance of decisions being taken on the roads programme as set out in the National Development Plan. We recommend that an appropriate research project be initiated at an early stage, in order to remedy this situation. The information from such a project will be integral to both the decision-making process, in terms of influencing future decisions, and to the monitoring and management of programmes which are already being put in place.

**Public transport**

15. We welcome the increased investment in public transport proposed under the National Development Plan, although this is still far less than the investment in roads infrastructure (which, of course, also benefits road-based public transport). We recommended in our submission on the draft National Greenhouse Gas Abatement Strategy that the existing mix of investment in roads and public transport requires ongoing monitoring to ensure that the correct sustainable balance is achieved, taking account of the projected increase in traffic-related greenhouse gas emissions. In this regard, we believe that additional funding should be made available for public transport; improving public transport and changing demand practices will potentially benefit roads programme objectives. Improved public transport can help to move commuters from private cars to buses, thus reducing congestion to the benefit of other road-users, as well as having potentially favourable impacts on emissions. The OP should make clear the desired modal split in each of the major urban centres.
16. We accordingly recommend that investment in public transport under the OP should be expedited. In addition, if money becomes available for reallocation towards the end of the programme period, it should be used for public transport. Similarly, any potential savings from redesign in the roads programme (as suggested above) should be redirected to public transport.
17. We are concerned, however, that previous delays in delivering public transport measures have increased pressure on/for roads and private transport, and have created trends which are difficult to eliminate once established. The unreliability of public transport has turned a number of people away from utilising it; the challenge will be to encourage them, through incentives, education and awareness measures, to change back to public transport. Addressing the attitudes of the younger generation, who will be the main road users within the next 10 to 15 years, will be especially important. We also see a need for an integrated timetable on public transport improvement measures so as to avoid further delays in obtaining overall benefits.
18. We also consider it important that investment in public transport should not be determined by current levels of usage. For reasons including non-provision of

services in some areas, or unreliable and inconvenient public transport in others, such levels are likely to be depressed at present. It can be expected that improved services will increase demand, and investment planning should take account of this.

19. Improvements in the roads programme can also benefit public transport, by facilitating improvements in bus services. More can, and should, be done in terms of improving road based public transport. We are concerned that the proposed motorway programme could have a potential negative effect on public transport, e.g. by hindering accessibility, affecting routing of services, reducing passenger access points, etc. Proactive measures are needed to improve public transport in this regard, not just road improvements which may permit faster journey times.
20. Public transport is also an important component of sustainable settlement strategy. As commuter areas expand, public transport must be provided to serve mobility needs and provide an alternative to individual car transport. There is an important link here with planning policy, and we expect that the National Spatial Strategy will address some of the issues concerned. However, we feel that these considerations need to be integrated within transport policy also.

### **Rural and regional transport**

21. We regret the relatively small amount of money allocated under the National Development Plan to regional transport (approx. £163 million out of £2.2 billion on all public transport, compared to £4.4 billion on national roads). In particular, while we welcome the commitment to develop and build on local pilot projects for public transport services, the provision of only £3.5 million for this purpose is grossly inadequate and should be substantially increased to further develop such transport services and implement lessons learned from the pilot projects.
22. The provision of public transport in rural areas needs to be significantly improved. This applies to both rail and bus services, which also need to be better integrated with each other. Problems such as the lack of co-ordination of schedules, connections, timetabling and the lack of integrated ticketing, have affected both passenger numbers and passenger confidence. At present, rural public transport cannot be depended

upon, with the result that private transport becomes the most reliable mode for travelling; this leads to increased road traffic. Apart from the implications of widening commuter belts, public transport in rural areas is becoming increasingly important as more farmers travel to the economic centres for other work to supplement their farm income, and to facilitate tourism. Research on the demand for public transport should include demand in rural areas – i.e. the potential, rather than existing, level of demand – and this should inform the planning of, and allocation of funds to, services in this regard. Particular account should be taken of the needs of the mobility-impaired and the elderly who currently have no access to transport. Such research will also have to acknowledge the need to win back customers, through education and the provision and demonstration of improved services.

23. We believe that a good case can be made for enhanced provision of rail services outside Dublin. This is not solely an issue of track upgrading, but also of increasing the level of service by providing more frequent services, expanding the areas served, improving standards of comfort and reliability, etc. As well as inter-urban services, local commuter services (including long-distance commuting routes) should be improved in this way.

#### **Indicators, Research and Development**

24. Policy development in the field of sustainable transport needs to be supported by an appropriate programme of research. While work has already been carried out in this area, an overall assessment should be made of the work to date and of future research needs. *Comhar* will be giving further consideration to this issue, taking into account relevant results from the first phase of the EPA research programme for 2000-2006. The OP should acknowledge research needs in this area and make provision for financial support for appropriate research on sustainable transport.
25. Indicators used in the OP should be designed to measure progress towards achieving specific environmental objectives. They should also be relevant to public concerns – for example, not just user statistics, but also customer opinions (including, for example, whether they consider transport services to be value for money). Other important indicators would be travel time, and the ease of access to public transport (e.g. distance to nearest bus stop or rail station).

26. We also propose that there should be a budget for R&D innovation in areas such as technical vehicle improvements, alternative fuels, etc. We would suggest that measures should be included in the OP to create a market for new technologies, such as electric cars – e.g. subsidies to major fleet operators to buy and use such vehicles. Other supportive measures could include tax reform and more favourable pricing for cleaner fuels.

### **Education and awareness**

27. We have already noted the need for education and awareness raising in order to change attitudes to public transport. However, attention must also be paid to attitudes to private transport, including the impact of private car use in terms of emissions of greenhouse gases and air pollutants. Every avenue, and creative means, should be used to get across the important messages, with a view to changing peoples' perceptions of different options and of their own contribution.

### **Conclusion**

28. We believe there is a need for an overall debate on sustainable transport investment. In our submission on the draft National Greenhouse Gas Abatement Strategy, we said there was a need for a fundamental revisiting of transportation goals, emphasising that a sustainable transport policy needs to take account of issues including greenhouse gas abatement, land use planning, and provision and design of road infrastructure. Longer term issues of affecting behaviour and influencing car dependency also need to be considered. We are concerned that past focus has been on the need for investment to remedy deficiencies without considering the best way to spend the huge sums of money involved for the long-term benefit of both road users and the environment. This focus needs to be changed.