

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

### **Transport-related issues in the Mid-Term Review of the National Development Plan**

#### **Background**

1. Decisions made in and under the National Development Plan are a major potential influence on sustainability. Accordingly *Comhar* undertook an early study of the Plan with the intention of contributing towards the preparation of Operational Programmes. The results of that study included a Recommendation in relation to Transport-related issues under the NDP and Economic and Social Infrastructure Operational Programme.(footnote reference)
2. At this stage the NDP and OPs are being reviewed and in that context we make the following comments in relation to the transport elements of the Development Plan, in particular those contained in the Economic and Social Infrastructure Programme.
3. Sustainable transport is a major area requiring further attention. Comhar's Recommendation in 2000 included the following:

“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.”

These trends have indeed worsened in the intervening period. In particular it is becoming clear that transport-related emissions are the major impediment to meeting our greenhouse gas emissions reduction commitments.

#### **Integration with National Climate Change Strategy**

4. We are concerned that the transport elements of the NDP are not integrated with the national objective of 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. We re-emphasised these points in our comments on the ESIOP.
5. At this stage it is vital that the Mid-Term Review of the National Development Plan be seen as an opportunity to bring the plan into compliance with the NCCS and Ireland’s Kyoto obligations.
6. The National Climate Change Strategy envisages a reduction of 2,670 Mt CO<sub>2</sub> from transport. Under current policies, this target will not be met. Instead, CO<sub>2</sub> emissions from transport are rising at a faster rate than from any other sector. The ESIOP noted that the roads programme would have significant

unquantified negative impacts on emissions of greenhouse gases. Since then no assessment on the resultant levels of emissions has been carried out. Nonetheless it is clear that at the moment, investment in road infrastructure is leading to increases in CO<sub>2</sub> emissions contrary to targets in the National Climate Change Strategy.

7. 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 assessment be carried out at this stage. The information from such an assessment 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.

#### **Environmental assessment**

8. *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 and Social 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.

9. 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.
  
10. 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**

11. It was suggested (by the external evaluators) that there was over-design of roads projects under the previous Transport OP. The evaluators’ report on the current OP suggests that the National Development Plan is 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.

12. 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.
13. We strongly recommend that all new roads projects, and also major improvements of existing roads, assess the needs of cyclists and pedestrians and design in such a way as to prioritise their safety. This will not only help to support these more sustainable forms of transport, but add to their safety.

### **Public transport**

14. 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.

15. We accordingly recommend that investment in public transport under the OP should be increased including by the use of potential savings from redesign in the roads programme (as suggested above).
16. 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.
17. 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.
18. 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. We note that these issues are not considered as part of the current road design process and recommend that this change. Proactive measures are needed to specifically improve public transport in this regard, not just road improvements which may permit faster journey times.

19. 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**

20. We regret the relatively small amount of money allocated under the National Development Plan to regional transport. In particular, while we welcome the commitment to develop and build on local pilot projects for public transport services, the provision 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.
21. 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 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.

22. 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.
23. We recommend that transport investment be rebalanced in the direction of rail, including rail freight, and public transport generally. In particular we recommend that the NDP provide the funding for the relevant years' expenditure as recommended in the Strategic Rail Review.

#### **Eco-audit, Integration of “horizontal impacts”**

24. 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. The current practice of cursory, retrospective, non-quantified assessments is of little value.

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

25. 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.

26. 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).
27. 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**

28. 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**

29. 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.