

Department of Transport: Statement of Strategy 2008-2010

Comhar SDC recommendations, 21 September 2007¹

The Department of Transport's new Strategy Statement will set priorities for the work of the Department for the three-year period from 2008-2010. Comhar SDC makes the following recommendations:

1. Opportunities and challenges going forward

The negative trends of the transport sector have been detailed elsewhere, particularly in a 2006 Comhar briefing paper on the Irish transport sector² and in a discussion paper forwarded by Comhar to the Department in summer 2007.³ In brief, the transport sector in Ireland is faced with a cascade of challenges:

- Limits to energy supply: oil resources are increasingly concentrated in politically unstable or remote parts of the world and are expected to become more expensive and prone to short-term price shocks
- Limits to natural carrying capacity: greenhouse gas emissions, stressed ecosystems and urban and transboundary air pollution are exceeding the Earth's natural carrying capacity
- Limits to social capital: a transport system based on the private car is imposing heavy costs through urban sprawl, reduced health, vulnerability of non-motorists to injury, and economic costs especially through congestion

The high rate of growth in this sector (which has exceeded the growth of the economy as a whole over the past decade) has at times lacked adequate coordination. Although the Department of Transport has overall responsibility for transport policy in Ireland, there is a lack of multi-modal integrated transport planning (instead, transport decisions are typically taken on a mode-by-mode basis. For instance, the National Roads Authority (NRA) is responsible for roads, and there is a range of bodies responsible for public transport, sometimes with conflicting institutional interests). There is also a lack of national capacity for transport research, with only Dublin benefiting from a transport modelling resource (in the Dublin Transportation Office). The failure to coordinate transport and land-use planning is a particular failure that requires urgent attention: for instance, the NRA has complained that the national asset of motorways is being devalued by inappropriate development alongside this publicly funded infrastructure.

There are good opportunities for change. Increased awareness about climate change and the other negative impacts of transport, as well as a strengthened will in Government to address complex policies through integrated, cross-sectoral approaches, provides an opportunity to address the challenges that transport poses to sustainable development.

¹ This submission was drafted by Lisa Ryan and Thomas Legge, Comhar SDC Secretariat, and adopted by Comhar Council on 20 September 2007

² Richard Douthwaite, David Healy, Kevin Leyden, "Towards a Sustainable Transport System", briefing paper prepared for the Comhar conference "Towards Sustainability in the National Development Plan 2007-2013", 4-6 October 2006, available on www.comharsdc.ie

³ "Sustainable transport: Comhar SDC discussion paper", prepared by Thomas Legge, Comhar Secretariat, 31 May 2007

2. Recommended shape and emphasis of new Statement of Strategy

The primary focus of the new Statement of Strategy should be the development and execution of the Sustainable Transport and Travel Action Plan, which should in turn be the guiding strategy for the operations of the entire Department. This plan should provide a blueprint for the delivery of transport services that are environmentally benign, efficient, cost effective and safe.

3. Suggested priorities for the coming three years

The first priority for the department should be to ensure that its entire operations become aligned with the goal of sustainable development. In this regard the forthcoming Sustainable Transport and Travel Action Plan (STTAP) should be prioritised as a major strategic document for the Government.

- *Establishment of sustainable transport as the overriding mission of the Department of Transport:* Sustainable transport should become the explicit and overarching goal of the Department of Transport, informing all activities within all units of the Department and not merely being a sub-sectoral objective to be considered on an equal basis along with other transport priorities.
- *A positive and enticing vision for sustainable transport:* The STTAP should not use the term “sustainable transport” lightly: a transport policy that reduces the unsustainable impacts of the transport sector is not necessarily sustainable if the negative trends are not reversed or are only mitigated somewhat. A STTAP that contains only incremental improvement on business-as-usual should not claim to be sustainable. Instead, the STTAP should provide a compelling and enticing vision of how society could be improved through more economic opportunities, improved access, more efficient movement of goods and people and substantially less pollution and other harmful impacts. This vision could entail:
 - Stabilisation, then reduction, of the major negative impacts of transport
 - Decoupling of transport and economic growth
 - Modal shift away from road transport towards more environmentally friendly forms of transport
 - Technological solutions to transport’s sustainability problems
- *Modelling and research capacities for evidence-based policy:* Resources should be allocated to develop transport and land-use models for the whole country. The Department should allocate increased resources for policy analysis, especially for innovative measures such as user charging, congestion pricing and other incentive-based approaches.
- *Commitment to Sustainability Impact Assessment of transport policy:* All potential transport projects should be subject to an *ex ante* (and later *ex post*) sustainability impact assessment as part of the project design and selection process, whereby the economic, social and environmental aspects are identified. Monitoring and evaluation of progress in transport policy should be broadly based to cover social and environmental aspects as well as financial and economic criteria in a transparent process. This should include a baseline assessment – what would have happened in the absence of the policy or investment. In general, progress and success should be measured by monitoring outcomes rather than inputs on a

- regular basis with a set of sustainability indicators. All results of assessments should be made publicly available.
- *Full consideration of non-car modes of passenger transport:* The Department should devote additional resources and attention to non-car modes of transport, including public transport but also walking and cycling, which have hitherto been virtually ignored despite their potentially significant contribution to Ireland's transport policy mix. Special attention must be paid to rural areas, where in many places there are currently no practical alternatives to the private car.
 - *Integration of transport and land use policy:* Urban sprawl has become a reality in Ireland and many new conglomerations lacking in transport services have been created and hence providing residents with no alternative to car usage. The planning and design of residential and industrial development must take into account the transport implications. Accessibility to public transport should be an important criterion for land development, rather than the current situation where transport services attempt to follow development. Positive examples such as Adamstown (west Dublin), where the provision of public-transport infrastructure has preceded housing, should become the norm.
 - *Provision of environmental information to transport users:* Awareness should be raised among transport users of the environmental consequences of their choice of transport mode. A first step could be the carbon labelling of all passenger cars; this responsibility should be transferred from the motor industry (SIMI) to a public body. Once transport users are environmentally informed of their choices, a second related step could then provide incentives to users to switch to a lower carbon mode of travel.
 - *A focus on new technologies:* technological solutions, including (but not limited to) new kinds of fuels with lower environmental impacts, should be promoted
 - *Freight:* the huge environmental impact of freight transport should be considered and there should be a rebalancing away from the current dominance of road transport for freight.

These suggested priorities show that the goal of sustainable transport requires strong leadership from the Department of Transport working together with many other departments to deliver integrated and sustainable transport projects. It is important that the STTAP be implemented as soon as possible so that we begin to address now the failures of transport in Ireland.