

**20160608-DTTAS-SoS**

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Department of Transport, Tourism and Sport,  
Kildare Street,  
Dublin 2

Sent by email to:  
SoS@dttas.ie

05.08.2016

**RE: Consultation on Statement of Strategy 2017-2019**

Dear Ms. Cullen,

We refer to the notice on public consultation by the Department of Transport Tourism and Sport on 2017-2019 Strategy.

We are pleased to note that: *“This key policy document will define the strategic direction, high level goals and objectives on which the Department will focus for that period” and “It will also identify key performance indicators to help the Department monitor its progress and ensure that what is set out in the document is being delivered.”*

Since the previous strategy was adopted there is renewed imperative for decarbonisation and international leadership by Ireland on climate following the Paris Agreement 2015 and the passing of the Climate and Low Carbon Development Act 2015.

Current EPA projections show the extent to which Ireland is going to overshoot the EU 2020 Effort Sharing Decision targets. So far there appears there has been no effective policy to cut transport emissions except an economic crash.

Emission reduction should be a core priority in transport, tourism and sport and treated as a matter needing emergency response.

This climate imperative is irreconcilable with the support in the 2015-2017 DTTS Strategy to increase the number of air routes operating out of Ireland by 2017, thereby continuing growth in aviation, for which there is no technology in place to reduce emissions.

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The DTTS needs to address the concerns raised by the Minister for Communications, Climate Action & Environment. Denis Naughton, stated in an interview in The Irish Times 20th June 2016:

*“Transport is going to be a huge challenge for us,”* he said, referring to the increase in transport emissions since the State came out of recession.

He said the response from Government to this was limited. *“Until the technology is developed for e-cars to be extensively available, there is not a lot we can do about it. The biofuels commitment will deal with a certain part of it.”*

There is a broad range of actions for immediate implementation that can and need to be taken by the DTTS. Allowing continuation of current levels of car use, even if full e-car conversion were to be achieved in the next decade is unsustainable because of congestion, generation and inefficient resource and land use. Increasing the bio-fuel content does not address or achieve modal shift to cycling or public transport, and perpetuates use of the inefficient polluting internal combustion engine, particularly diesel.

The response needed is a reactivation by the Department of Transport Tourism and Sport in re committing to and properly implementing the 49 actions set out in *“Smarter Travel-A New Transport Policy For Ireland 2009-2020”*. This contains a range of positive measures on creating better connected communities with walking and cycling being a core element.

The policy has two key targets for 2020 from the 2009 level which are not being met:

- Single car work related commuting reduced from 65% to 45%;
- The total kilometers travelled by the car fleet will not increase significantly.

These measures will also benefit the action needed on air pollution.

Current national transport investment and planning decisions made by Local Authorities and An Bord Pleanala are at complete variance with these targets.

- Transport Investment Ireland is funding schemes generating more traffic into urban areas e.g. The M7 lane additions from Newbridge to Naas interchanges, and over scaled Gort Tuam Motorway.
- Local Councils and An Bord Pleanala are continuing to permit car based development like the extension to the Kildare Retail Village and Kerry Group Campus on the N7, and extension of surface parking in Dublin Airport In counties such as Mayo and Roscommon almost the only housing being granted is exacerbation of ribbon development.

Road freight and goods movement, sea and air transport needs to be addressed as much as car, and integrated with tourism policy.

We have sent out the attached submission in the form of appropriate strategic direction and high-level goals.

Yours sincerely,

Ian Lumley

## **Department of Transport, Tourism and Sport**

### **HIGH LEVEL GOAL**

**To create a low carbon resilient society: integrating transport, tourism and sport with sustainable development and resource consumption, creating communities with walkable and safe cycling access to services, public transport and recreation, and fostering public health and well being.**

**Review and amend the legal remit of agencies under the DTTS including Transport Infrastructure Ireland, National Transport Authority and CIE and Fáilte Ireland to require enforcement of legally binding climate emission targets, with effective oversight role by Department of Communications, Climate Action & Environment.**

### **STATEMENT OF STRATEGY FOR TRANSPORT**

**The overarching strategic transport policy objective for the Department of Transport Tourism and Sport is for Ireland to take international leadership in reducing national and transboundary climate emissions to the level required by Paris Agreement 2015 objective of limiting global temperature increase to less than 2 degrees and as near as possible to 1.5 degrees over pre industrial levels.**

Transport comes under the EU Effort Sharing Decision (ESD) for the non-Emission Trading Sector (Non-ETS) with agriculture and built environment requiring an aggregate reduction of 30% relative to 1990. Under the National Policy Position, transport, electrical generation and buildings (heating etc.) need to be reduced by 80% compared to 1990. Currently transport emissions are projected to be more than 150% greater than 1990 in 2020 and over 200% greater than 1990 in 2030. Reversing this trend in transport must necessarily now be a core priority driving all future transport policy.

So far there appears there has been no effective policy to cut transport emissions except an economic crash. Emission reduction should be a core priority driving all policy. If transport cannot achieve its part of the ESD target pathway to minimise its cumulative emissions then the sector will need to pay for all additional reductions in other sectors. The aggregate Non-ETS emissions target is necessarily zero-sum so if emissions reduction is less costly in another sector such as building retrofit or agriculture then the onus will be on transport to pay for those reductions in other sectors.

DTTA in its input to Irish Government policy and to Irelands advocacy in EU and international negotiations, DTTS will need to ensure that the level of actions proposed is in line with the scientific advice on the level and rate of emission reduction required. This will require major enhanced emission reduction action in all transport sectors including aviation and shipping.

DTTS will work with Department of Communications, Climate Action & Environment

Adopt the most progressive achievable actions and targets for transport in the National Mitigation Plan to be delivered under Section 4 of the Climate Action and Low Carbon Development Act.

- Identify and provide for the protection of road, rail, and port infrastructure vulnerable to increased climate impact from flooding and storms in the National Adaptation Framework to be delivered under Section 5 of the Climate Action and Low Carbon Development Act 2015.

## **Meeting Ireland's EU 2020 and 2030 transport climate emission targets**

DTTS will effect the actions required to meet Ireland's EU climate targets.

### **For the period up to 2020:**

The EU Effort Sharing Decision (ESD) requires Ireland to meet binding emission targets of 20% on 2005 levels by 2020 in the non Emissions Trading Sector, Current EPA projections establish that transport emissions will significantly overshoot the 2020 target, therefore requiring a range of significant corrective actions to be taken.

The most recent published update by the EPA was in March 2016:

Link:

[http://www.epa.ie/pubs/reports/air/airemissions/2020\\_GHG\\_Projections\\_2016\\_Bulletin.pdf](http://www.epa.ie/pubs/reports/air/airemissions/2020_GHG_Projections_2016_Bulletin.pdf)

The projections for transport are summarised as follows:

*“Under the ‘With Measures’ scenario, transport emissions are projected to increase by 16% in the period 2014 to 2020. Under the ‘With Additional Measures’ scenario emissions are projected to increase by 10%. The latter scenario assumes the target of 10% renewable fuel use in transport is reached, 50,000 electric vehicles are deployed and more efficient eco-driving practices are in place.”*

DTTS will initiate a range of additional measures and actions to meet the ESD targets including immediate implementation of the 49 actions in “*Smarter Travel-A New Transport Policy For Ireland 2009-2020.*”

- Adjusting vehicle registration and fuel tax to incentivise purchase and use of less polluting vehicles.
- Introducing a pricing structure by 2018 for “out of town” parking with revenue returned to sustainable transport investment.
- Putting the structures and mechanisms in place for road use pricing to be in place for implementation by 2019.

### **For the period between 2021 -2030:**

DTTS will advance the strategic planning in infrastructural investment to achieve the binding EU emission reduction targets set out in the July 2016 proposed Effort Sharing Regulation (ESR), to reduce emissions in the Non Emissions Trading (ETS) sectors by 30% by 2030 compared to 2005.

This will require Transport Infrastructure Ireland to be directed to ensure that the entire focus of future transport investment from 2017 is to be in:

1. Enhancing the modal share of public transport and cycling versus car use, in and around major urban areas and for commuting and routine journeys;
2. Enhancing the modal share of public transport for inter urban and inter regional travel;
3. Switching longer distance bulk freight movement to rail; and
4. The major strategic investment needed in Dublin City including the Dart interconnector

### **Renewed Action on Targets and Actions in Smarter Travel Policy 2009**

DTTS reaffirms and will undertake enhanced action to implement the policies and measures contained in Department of Transport “*Smarter Travel-A New Transport Policy For Ireland 2009-2020*” which adopted two key targets for 2020 from 2009 levels:

1. Work related commuting reduced from 65% to 45%; and
2. The total kilometres travelled by the car fleet will not increase significantly.

and will put in place the 49 actions including spatial planning, public transport and cycling investment and “*institutional arrangements to deliver the targets*” set out.

Particular action is required on

- Free urban fringe car parking which is promoting unsustainable travel patterns and undermining the functional status and critical mass of urban centres in sustaining or developing public transport accessibility. DTTS will engage with the Department of Finance in applying parking levies to all retail shopping location with over 50 car spaces by 2018.
- Implementing Workplace Travel Plans for major employment locations and clusters to reduce single car user congestion generation, in accordance with “*Workplace Travel Plans- A Guidance for Implementers*” produced by the National Transport Authority. DTTS will provide enhanced support to the National Transport Authority and local authorities for the adoption and ongoing implementation of effective mobility strategies for major employment centres, schools and other locations, as well as sporting and other events generating transport demand

### **Renew Action on 2020 Target on Cycling**

DTTS reaffirms and will undertake enhanced action to further “*National Cycling Promotion Framework 2009*” which provided that 10% of commuting trips will be by bicycle by 2020.

### **Climate Proofing of Future Transport Investment in Climate Mitigation and Adaptation**

DTTS will review all future transport investment in accordance with achieving low carbon mobility and Smarter Travel targets including reducing car use and dependency, switching of long distance goods haulage to rail, and the most efficient use of existing infrastructure including ports.

### **Adopting the EU “*A European Strategy for Low Carbon Mobility*”**

DTTS will adopt The European Commission’s “*A European Strategy for Low Carbon Mobility*” (published on 20 July 2015 and summarised in MEMO/16/2497) and to pursue the main elements of the strategy:

1. *Increasing the efficiency of the transport system;*
2. *Speeding the deployment of low emission alternative energy for transport; and*
3. *Moving towards zero emission vehicles*

DTTS will ensure that all strategic transport policy, fiscal measures and taxation structures are compatible with these objectives.

In the 2016 to 2019 period this will require :

1. Enhanced investment in electric transport connectivity; and
2. Achieving optimum emission standard efficiency in procurement of new bus purchases.

### **Enhancing Safe Walkable Communities and Cycling Access**

DTTS will promote low carbon, socially cohesive connected neighborhoods with reduced road vehicle travel speeds in urban and residential areas, enhancing the level of safe walking and cycling routes for access to services, schools and public transport across all communities.

DTTS will coordinate with the Department of Housing, Planning and Local Government, Local Authorities, and the National Transport Authority in the promotion of and the nationwide application of the *Design Manual for Roads and Streets*.

### **Integrate Sustainable Transport with the National Planning Framework (NPF)**

DTTS will coordinate with the Department of Housing, Planning and Local Government in the land use and transport policies in the National Planning Framework to achieve the objectives and targets in “*Smarter Travel-A New Transport Policy For Ireland 2009-2020*”

DTTA will resolve the conflict with Smarter Travel policy where Local Authority Development Plan parking standards require an excessive number of car parking places incompatible with achieving the Smarter Travel targets in modal shift to cycling, public transport or car sharing.

## **Aviation**

DTTS will review aviation policy as continued growth in international aviation and the lack of action to put in place alternative technologies is incompatible with the targets in the Paris Agreement 2015.

This objective in the 2015-2017 DTTS Strategy to increase the number of air routes operating out of Ireland by 2017, thereby continuing growth in aviation is not tenable.

## **Port Development**

DTTS will review current Irish port capacity and expansion projections having regard to the UN Sustainable Development Goals, and EU policy on the Circular Economy which aims to reduce resource consumption.

Current expansion proposals by the State port companies of Cork, Dublin, Galway, Foynes and Dun Laoghaire are based on projected increase in traffic tonnages which would significantly increase transboundary shipping emissions. This is furthermore based on assumptions of continuing material resource extraction and consumption which is not compatible with the level of international action required on reducing climate emissions and bio-diversity, or a sustainable resource consumption footprint for a country in the developed world.

## **Advancing Ireland and Britain Low Carbon Connectivity**

DTTS will initiate a feasibility study for co-operative action between Irish and UK Governments and Welsh Assembly for development of the most emission efficient ferry services and electrification and speed enhancement of the Holyhead to Crewe railway. This is in recognition of the lack of and availability of alternative technology for low carbon aviation, as well as the risk of aviation dependency- to a risk such as the 2010 Icelandic volcanic eruption.

## **Action on Air Quality Standards**

DTTS will take action on current and continuing NOX and particle emissions from diesel vehicles in Ireland which are incompatible with the World Health Organisation standards and risk breach of EU emission standards under Air Quality Directive, 2008/50/EC. [See attached University College London report]

For 2017 – 2019 the following action will be taken:

- Adjusting vehicle registration and fuel tax to incentivise purchase of less NOX and particulate emission polluting vehicles;
- New substantial lower emission procurement standards for purchase of Dublin Bus, Bus Eireann and other public service vehicles; and
- “Smarter Travel” measures to reduce level of car use and congestion.

### **Material Procurement Certification for All Transport Investment Projects.**

DTTS will introduce a certification requirement on contracts for transport projects including road maintenance, (similar to that in place for tax clearance) to ensure that all sand, gravel, stone, concrete, tar macadam and other materials are sourced from sites that are fully planning permission compliant. This is to ensure applications of environmental standards and will also mean that material providers with full planning compliance, are not put at unfair competitive advantage with providers who are not. This certification would apply to all procurement for Transport Infrastructure Ireland and local authority projects including maintenance.

## **STATEMENT OF STRATEGY FOR TOURISM**

**The overarching strategic tourism policy objective for the Department of Transport, Tourism and Sport is promotion of low carbon tourism, both within Ireland and for overseas visitors, based on the appreciation and experience of Irish life and culture, nature, landscape and history, while at the same time protecting the values and qualities which make Ireland attractive.**

### **Addressing Transport Emissions**

Ireland needs to take international leadership in reducing trans boundary transport emissions, including aviation and shipping, to the level required by the Paris Agreement 2015 objective of limiting global temperature increase to less than 2 degrees and as near as possible to 1.5 degrees over pre industrial levels.

International climate action in accordance with the Paris Agreement 2015 will remain ineffective until aviation and shipping is fully included.

The continued expansion of aviation is incompatible with this objective, as there is no technology in place to switch to low carbon planes. The current international low cost flight fare model, is based on a range of hidden subsidies and does not reflect or address the actual emission impact of aviation.

The proposed Dublin Airport northern runway project needs to be terminated as it is based on unsustainable aviation expansion projections.

The continued endorsement by the DTTS as stated in its 2015-2017 strategy to increase the number of air routes in and out of Ireland, is not tenable.

Major sustainability issues also arise in relation to the growth in cruising.

The level of car dependence of tourism in Ireland also needs to be addressed both for emission impact, and congestion in locations like Dingle at peak time, as well as conflict with promotion of cycling on the Wild Atlantic Way and other routes.

DTTS will advocate

- The need to curtail growth in aviation demand;
- For the Irish Government position in international climate negotiations to seek an effective carbon tax on aviation; and
- For a joint initiative with the UK Government for a low carbon passenger ferry from Dublin to Holyhead and electrification of Holyhead Crew railway line to reduce aviation use.

### **Sustainable Tourism Promotion**

There is major opportunity to build on and expand on current tourism initiatives in outdoor activity, walking, hiking, cycling, kayaking and nature appreciation in Ireland which are of benefit to health and wellbeing, low in environmental impact, and of extended benefit to local communities.

DTTS will focus tourist promotion for the 2017-2109 period by:

- Continued and enhanced investment in walking and cycling routes;
- Attracting long duration visitors to Ireland over short stay;
- Seeking a joint initiative with the UK for a low carbon passenger ferry from Dublin to Holyhead and electrification of Holyhead Crewe railway line, to reduce air travel use; and
- Reducing the level of car based or car dependent tourism

-END-