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SUBMISSION TO DEPARTMENT OF TRANSPORT
STATEMENT OF STRATEGY 2021- 2023

ADDRESSING THE GLOBAL CLIMATE AND BIODIVERSITY LOSS EMERGENCY AND COVID-19

We face a global climate and biodiversity loss emergency. Transboundary resource consumption needs to be brought within planetary boundaries. Much of the lifestyle footprint of those in more affluent countries is dependent on mineral and energy extraction, deforestation, animal feed production, waste generation and other impacts across the world which are incompatible with the UN Sustainable Development Goals.

Human and planetary health and wellbeing is the overarching concept of the SDGs and Ireland's 2020 Programme for Government.

In transport generation, the impact of car use and dependence, emissions from shipping and freight movement for consumption of goods, and aviation use by those in the developed world, and the more affluent in developing countries, if continued and extended for a larger global population, is untenable.

Ireland's national and transboundary transport footprint ranks high in greenhouse gas (GHG) and biodiversity stress as well as other global footprint indicators in resource production, consumption and energy use.

We now face the current and uncertain continuing impact of Covid-19. Even if a vaccine is achieved within any immediate timeframe, priority will need to be given to the most vulnerable, and the time period for achieving a return to a pre-pandemic world is not clear. Covid-19 has radically affected transport in home working and conference participation as well as in relation to the collapse of aviation and cruise ship travel. More time spent on work and social communication through computer linkages or experiencing sporting and other events online has meant more time spent indoors at home. For those with car access single driver use has replaced public transport and lift sharing use.

We have also discovered that much of the international aviation impact of meetings and conferencing can be substituted by virtual linkages and that more flexible home working

conditions can change what are for many lengthy and time consuming established daily home to work commuting patterns and separation from families.

We also face the uncertainty of Brexit and the potential requirement of greater direct transport connection with continental Europe.

EVALUATION OF DEPARTMENT OF TRANSPORT *SMARTER TRAVEL* POLICY

Smarter Travel - A Sustainable Transport Future (2009 – 2020)[1], was the overarching national transport policy by the Department of Transport in 2009. It contains clear targets to stabilise the total kilometres travelled by the national car fleet at 2009 levels, and reducing the overall national figure for car based workplace travel from 65 % to 45% by 2020.

It set out 49 specific actions with five key goals:

i. *to reduce overall travel demand;*
ii. *to maximise efficiency of the transport network;*
iii. *to reduce reliance on fossil fuels;*
iv. *to reduce transport emissions; and*
v. *to improve accessibility to transport*

The final objective 49 for an interdepartmental implementation group was never even set up.

The non-progress on the *Smarter Travel* objectives should be considered among the major public policy failures in the history of the State. There has been a lost decade in sustainable transport investment, governance and strategic planning.

This is indicated by the following:

- On a national basis there was no change on the overall level of car-based workplace travel, or any modal shift to cycling outside central Dublin;

- No effective strategy to reduce transport greenhouse gas emissions was put in place. This was part of the basis of the Friends of the Irish Environment case which struck down the National Mitigation Plan in failing to comply with the Climate Action and Low Carbon Development Act 2015 in the Supreme Court judgement in July 2020;

- Confirmation of longstanding concern on the monitoring of NOx in Dublin by the September 2020 reporting by the EPA that a location at John's Road near Heuston Station showed an average exceedance of EU limits in 2019 and that the same was likely to apply in other areas;

[1] SmarterTravel: A Sustainable Transport Future (2009 – 2020): http://www.smartertravel.ie/content/smartertravel-policy-document

- The transport investment set out in *Ireland 2040 - The National Development Plan* is based on a continued motorway and dual carriageway investment programme which would exacerbate car-based sprawl and undermine the modal share of rail versus road use;

- Local authorities and An Bord Pleanála continued to approved decisions without addressing *Smarter Travel* actions and targets, including the case of Limerick, which was designated and funded to be a "*Smarter Travel Demonstration City*";

- Road plans, such as the extra lane on the M7 between Naas and Kildare and the new N5 dual carriageway replacing the existing Castlebar to Westport road, being approved or put under construction without addressing *Smarter Travel* targets;

- Local authorities failing to amend their Development Plan standards for one-to-one car parking place accommodation for each employee in urban edge and business park workplace locations, allowing schemes such as the Kerry Group research HQ with 700 staff parking places located on an M7 motorway interchange disconnected from Naas and any accessible public transport link;

- Dublin Bus procurement of diesel vehicles, way behind the standard applied to other progressive European cities, and the continued licencing of new diesel taxis;

- Failed emission and taxation policies allowed rising high GHG emitting SUV purchases in urban areas, and at the other end of the car purchase market, the import of polluting diesel second-hand cars from UK;

- The systemic failure of the National Cycling Strategy 10% cycling target;

- The promotion of "The Wild Atlantic Way" as a car driving route creating a conflict with the amenity quality of the area, as well as safe cycling.

Following a request to Irish Environmental NGOs from the OECD as part of its evaluation of sustainable travel in Ireland, An Taisce submitted a report in July 2020 on the implementation of Smarter Travel (see Appendix 1).

Irish transport governance and investment planning was as unfit for purpose in the pre-Covid-19 world, and is even less so now. There is no point in having decarbonisation and sustainability objectives without the actions and institutional structures to secure delivery.

IMPLEMENTATION OF THE TRANSPORT MEASURES IN THE PROGRAMME FOR GOVERNMENT

The June 2020 Programme for Government now constitutes overarching national transport policy.

The Department of Transport's immediate strategy needs to be to secure the implementation of the Programme for Government and the overarching objective of "*Improving the Wellbeing of the Irish people and society*" with "*New Measures of Wellbeing and Progress*", a policy of "*Town Centres First*", publication of " *A National Clean Air Strategy*", and "*Better Work Life Balance*".

HEALTH, WELLBEING AND ACTIVE TRAVEL

The world beyond Covid-19 will need to be a different place, and there is now a particular opportunity to plan for a future of better connected communities and neighbourhoods, healthier lifestyles, and reconnection with the endangered natural world.

The multiple adverse health and cost impacts of car traffic generation cannot be sufficiently emphasised: in air pollution, greenhouse gases, noise pollution, tyre wear impact, congestion, wasteful land and resource use, reinforcing sedentary lifestyles, and making local areas and urban and rural roads less attractive for walking and cycling.

Climate and air pollution action requires the optimum achievement of electric vehicle purchase as part of a wider transport strategy.

The land transport future needs to be multi-modal one

The focus of Smarter Travel was on changing the modal shift of car-based workplace travel to other transport modes from a 65% national average to 45%, a target on which no progress overall nationally was made.

A new transport strategy needs to take a multimodal approach and address the cultural conditioning of indiscriminate car use and dependence, the effect of road investment and decades of physical planning in reinforcing this. The objective should now be to achieve a modal shift for all categories of car trips, whether school, workplace, local service access, social and recreational travel to amenities and leisure, longer distance journeys, and tourism.

The opportunity now arises for a total refit of transport policy, regulation and investment for the future, centred on human and planetary health and wellbeing with "*active travel*" in safe walking and cycling for local mobility and a major modal shift to public transport for all types of journeys. The transport system that must be fully decarbonised within the optimum achievable time, whether for road, rail or shipping; for human mobility or freight and

services, while also addressing aviation impacts, and reducing transboundary resource consumption.

Active Travel

"Active Travel and public transport" is the overarching Transport objective of the June 2020 Programme for Government which sets out as immediate objective:

> *"We are committed to a fundamental change in the nature of transport in Ireland.*
>
> *Necessary improvements in climate impact, quality of life, air quality and physical and mental health demand that every effort is made by the Government to make active travel and public transport better and more accessible.*
>
> *Each local authority will be immediately mandated to carry out an assessment of the road network, to see what space can be allocated for pedestrians and cyclists. This should be done immediately*". (Page 13)

Data on the social impact of Covid-19 is revealing increased time spent on computer screens and other electronic media, with less outdoor activity and exercise particularly for younger people, with future health impacts. This has been combined with closure of gyms and restriction on sports activity.

While Covid-19 is likely to generate greater future levels of home and flexible working, there is continuing constraint in public transport capacity and car sharing. At the same time there has been a welcome increase in urban centre pedestrian streets, safe segregated high capacity cycling routes, and people of all ages cycling.

The Department of Transport's policy since 2009 has made particular focus on modal shift from individual cars to walking, cycling and public transport. However 2019 data (see our report to the OECD in Appendix 1) show there has been no overall national reduction in car dependence.

Future strategy should focus on wider cross-community support for active travel for all ages and journey types.

Whether in rural areas, cities, towns or villages a significant level of car use is generated by short journeys that could be made by foot or in particular by bicycle. This includes school trips, family and social visits, access to local services and smaller shopping needs, and access to local sport training and community facilities. A particularly problematic impact is the level of car-based use to parks, recreation and amenities such as coastal or lakeside areas, which has the effect of undermining the quality of the destination.

If a significant number of shorter journeys made in local areas by car to local services, social visits, sports clubs or trips to parks and recreational areas were to switch to walking and cycling this would have multiple benefits, including to public health.

The Irish Heart Foundation has highlighted international research on obesity levels in the 40-year plus population as a growing concern, and the need for more active lifestyles[2].

How An Taisce can contribute to advancing active travel

Under "Cycling and Walking" the Programme for Government states as an objective: "*to work with the green schools programme"* to "*dramatically increase the number of children walking to primary and secondary school*".

"Bringing communities with us" states as objective to *"support a new Green Flag programme for communities building on the successful programme for schools*".

An Taisce is seeking to partner with national, community and sporting organisations in achieving a transformative national shift to walking and cycling as the default or preferred mode of choice of shorter journeys. The focus would be on family-orientated cycling, and cycling for all ages and abilities for local trips of all kinds.

The initiative would focus on creating community supported safe cycling route enhancement to rural villages, destination centres in urban areas, schools, parks, gyms, sports grounds, and where low-cost interventions would achieve the greatest benefit in creating more attractive safe walking cycling.

A wider community and sports club initiative in promoting cycling would also benefit enhanced safe cycling to schools. This would complement the work An Taisce has been carrying out with National Transport Authority support for active school travel.

For those travelling for sports training or to gym, a cycling trip can be part of the exercise regime. For a family travelling to a local park cycling can be an attractive positive part of a day's healthy outdoor experience. Picking up items from a local convenience shop can become a bike trip as a matter of routine.

Air quality

Effective monitoring and emission control action is required on areas with NOx exceedance to limit more highly polluting vehicles. Legal challenges by health and environmental organisations or affected individuals are mounting across Europe and will also arise in Dublin and potentially other Irish cities unless action is taken.

[2] https://irishheart.ie/news/obesity-and-covid-19/

The quality of Ireland's air is under serious threat, due in large part to continued over-reliance on heavily polluting transport options in our cities. One key markers of degraded air quality is the level of nitrogen dioxide (NO_2) present in the ambient air. NO_2 primarily gets released into the air as a result of combustion engines in cars, trucks and buses, and has significant negative consequences for human health and the environment.[3]

The environmental effects of NO_2 are well known. When it enters the atmosphere, NO_2 is the principal cause of acid rain, which causes significant damage to ecosystems in Ireland and around the globe.[4] In addition, NO_2 is a major contributor to smog in cities, which has severe ecological, health, and development consequences. From a human health perspective, degraded air quality aggravates an array of respiratory illnesses, including asthma. This is of serious concern, particularly in the context of Ireland's unusually high rates of respiratory illness. Ireland records the third highest death rate from lung diseases in Europe, and suffers from the fourth highest rate of asthma in the world[5]. Clearly, the consequences of unchecked degradation of our national air quality are grave.

Action has been taken at European level to combat and reduce the level of air pollution in our cities. The Clean Air for Europe (CAFE) Directive came into effect in 2008, and was transposed into Irish law in 2011 by the Air Quality Standards Regulations. The directive sets out clear and legally binding limit values for air pollutants, including NO_2. As previously noted, EPA data demonstrates that these limits have been significantly exceeded in at least one location, with the likelihood of exceedance in other locations as well. These breaches are not trivial matters; legal proceedings have been successfully taken to the Court of Justice of the EU on the basis of exceedance in the city of Brussels. The Court was clear in its view that the Directive is a concrete enunciation of the Union's obligations to protect the fundamental right to life of its citizens, as well as the high level of environmental protection required of it. Further, the Court affirmed the jurisdiction of domestic courts to take "all necessary measures in respect of the competent national authority", to ensure proper compliance with the Directive.

Ireland's continued failure to come into compliance with the CAFE Directive is therefore a very clear violation of its obligations as a member of the European community, and of our own domestic law. The problem is easily solved, however: air quality will improve when a meaningful modal shift away from heavily pollutant transport options and towards cycling, walking and other low- and non-pollutant transport, is achieved.

[3] https://www.euro.who.int/__data/assets/pdf_file/0017/123083/AQG2ndEd_7_1nitrogendioxide.pdf
[4] https://www.epa.gov/no2-pollution/basic-information-about-no2
[5] https://www.erswhitebook.org/chapters/the-burden-of-lung-disease/

CYCLING AND WALKING

The Programme for Government (pages 13 and 14) sets out ambitious policies and actions for Cycling and walking which need to be realised.

Cycling as a mode of transport offers numerous well documented benefits to society, including:

- Improved public health (especially important in this Covid period);
- Reduced congestion;
- Reduced greenhouse gas emissions;
- Reduced air and noise pollution;
- Increased mobility (again, especially important in this Covid period when numbers that can safely use public transport are greatly reduced);
- More liveable and sociable streets and communities;
- High rates of economic return on investment.

Unlocking these benefits requires targeted and sustained investment, and international evidence demonstrates that investing in cycling provides excellent value for money. An Taisce needs to see the promises made in the Programme for Government (PfG) become reality, with clear timelines instituted so as to ensure that the various commitments made are followed through.

We outline our recommendations for Cycling and Walking growth under the following four headings:

- Taxation and Fiscal Policy directions to create modal-shift
- Institutional Changes
- Interventions to ensure all cycling infrastructure, both urban and rural, meets the highest standards
- Legislative Changes and Promotion of Cycling

Taxation and fiscal policy directions to create modal-shift

We recommend the following:

- 10% of the transport capital expenditure annual budget must be spent on cycling projects and 10% on walking projects (totalling €360M per annum) year-on-year as per the PfG.

- Subsidies for e-bikes to be increased, similar to e-cars. SEAI grants[6] for e-bikes especially e-cargo bikes, need to be part of the grants package.

[6] https://www.seai.ie/grants/electric-vehicle-grants/

- Mileage / km allowances for cycling, to encourage greater use of commuting by bike, similar to Belgium[7].

- Fleets of bikes for state and semi-state employees to use instead of cars for some work journeys.

- Provision of covered secure bike parking for all major transport hubs / interchanges, shopping and service centres, and in particular in schools and colleges.

- Transport Stimulus Fund for 'quick wins' for each local authority, every year, to drive modal shift, i.e. schemes which can be advanced quickly without the need for planning approval.

- Department of Transport, Tourism and Sport, NTA, RSA and TII officials to do study tours to the Netherlands, Denmark and the UK (for example) and systematically disseminate the knowledge gained widely within the Irish public / civil service.

- Expansion of bike to work scheme (recent changes welcome) to be more inclusive with focus on low earners, students, and unwaged.

- Funds to enable the retrofitting of train carriages for increased carriage of bicycles, and the future purchase of appropriate carriages to meet EU bike carrying capacity requirements[8].

Institutional changes to national level departments and agencies

We recommend the following:

- Create and resource appropriately within the Department of Transport, a National Cycling Coordination Office headed at senior level. This would be primarily focused on ensuring coordination on policy, standards, and expenditure across government departments.

- Address the need for the standardisation of planning processes, consultations, and transparency across all local authorities. All planning proposals should be searchable and viewable online, and the processes open and transparent. Parity of esteem and parity of information is required between active travel and road schemes.

[7] https://cycling.today/more-than-400000-belgians-get-paid-to-cycle-to-work

[8] https://ecf.com/news-and-events/news/breakthrough-all-new-and-refurbished-trains-eu-offer-dedicated-spaces-four

Local Authorities

We recommend the following:

- Require every Local Authority to commission and oversee the implementation of a high quality cycling policy and strategy. This would encompass the three main strands of
  (i) 'policy planning (structure for continuous dialogue with users, target setting, resources, training, adopted policy doc);
  (ii) 'actions' (infrastructure, including the development of ambitious strategic cycle network plans, promotion / soft measures, staffing resources);
  (iii) monitoring / evaluation of policy.

- Require the appointment of Cycling Officers at Director of Services level in all Local Authorities, with a remit:
  - To produce and oversee the implementation of the above high quality cycling policy;
  - To set targets and effect modal change at local level;
  - To ensure adequate staffing resources for active travel development in line with PfG, and to oversee any required re-allocation of staff internally;
  - To set up a Local Authority Active Travel Forum (this could be sub-committee of the Transport Strategic Policy Committee) where stakeholder views are adequately represented.

- Develop a clear policy for Cycling in Rural Ireland[9]. Cycling needs to be a countrywide issue, not just an issue for major urban centres. The opportunities are there and these can also support local economic and social development.

Interventions to improve the quality of cycling infrastructure

The commitment in the PfG to fund cycling is quite explicit. The focus now needs to be on how to deliver high quality routes which will enable people of all ages and abilities (the "8 to 80 cohort") to make the choice to switch to active travel. We recommend the following:

- Prioritise as a matter of urgency a review of design standards
  - to ensure design and construction of safe high quality routes in line with best international practice;
  - to ensure design consistency across agencies, institutions, and local authorities

- The main standards / guidelines for review are the following. These should all dovetail with each other:
  - National Cycle Manual
  - Rural Cycleway Standards

[9] https://cyclist.ie/ruralvision/

- Design Manual for Urban Roads & Streets (DMURS)

- Establish Local / Regional Cycle Design Offices – sub-units of the NTA – so that there is proper oversight of the quality of all cycling schemes in all local authorities (as opposed to just some schemes in some areas as is the current situation). Consultancy staff will need to be deployed as appropriate. This will ensure available expertise for local authorities for quick delivery of high quality projects.

- Set up accelerated training programs for local authority staff in sustainable mobility design and implementation.

- Every Local Authority to develop ambitious strategic cycle network plans for their towns and at a county level.

- Covid cycling schemes: Ensure that the NTA systematically monitors the quality and use of all 'quick-to-construct' schemes with a view to feeding this knowledge into design standards and further plans by Local Authorities.

- Currently cycling schemes are designed by a range of bodies – the NTA, TII, by local authorities or by consultants working for any of the above, hence the need for improved coordination and consistency of design.

- Funding should not be provided for low quality schemes that do not meet the required design standards.

Legislative changes and promotion of cycling

We recommend the following:

- Resource and expedite legislative changes to prioritise active travel measures within an agreed timeframe. This is critical to support the growth of active travel.

- Note that in the 2009 National Cycle Policy Framework (NCPF), the following commitment was made: "*carry out a review of Irish road traffic legislation to change the balance in favour of the more sustainable modes such as walking and cycling*." (Policy 15.1, page 41). It is this broader review which is still required. Very little has advanced since the launch of the NCPF.

- For examples of regulatory initiatives which support cycling, see http://content.tfl.gov.uk/international-cycling-infrastructure-best-practice-study.pdf for reference. This is critical in helping to support growth in cycle mode share.

- Introduce legislation so that 30km/h becomes the default speed limit in all built-up areas, and Councils can then introduce exceptions to these limits where it is deemed safe and appropriate.

- Cycle promotion, especially among marginalised groups, is required. The same sophistication used in car advertising and marketing needs to be applied to sell active travel. This video example[10] from Dun Laoghaire Rathdown County Council (DLRCC) is an example of what is possible



Screen shot from DLRCC's video on the new Coastal Mobility Route

- Cycle Training, via the Cycle Right program, needs to be expanded further, with adequate funding to ensure that local authorities can offer cycle training for all levels and ages including on-street training.

- Support the creation for Ireland of a tool equivalent to the Propensity to Cycle Tool[11] as developed by Rachel Aldred for England & Wales. This would use Census data and would assist local communities in developing higher levels of cycling.

Walker and cyclist safety

There has been a progressive increase in safety for transport vehicle uses through speed limit enforcement on major roads, the change in culture of drink and driving, and the design of vehicles providing better protection to occupants in collisions.

However, the overall percentage of fatalities from walkers and cyclists arising from vehicle hits is problematic amounting to 29% of fatalities to date in 2020 (i.e. 36 out of the 125 fatalities), as per the Garda Roads Policing stats of 9am on 2 November 2020 and shown below.

[10] https://www.youtube.com/watch?v=-Fvxl4c6fGM&feature=emb_logo.

[11] https://www.pct.bike/

FATALITIES

Pedestrians	26
Drivers	49
Passengers	23
Motorcyclists	17
Pedal Cyclists	10
Pillion Passengers /Other	-
Total Year To Date	**125**

These fatalities should not be described as "accidents " but as public policy failures where unsafe walking and cycling conditions were allowed to interface with speeding motor traffic or inappropriate junction design.

International research is also showing that collisions with SUVs and other high-wheeled vehicles result in greater injuries to pedestrians and cyclists, even in lower speed incidents in urban areas. An increase in the use of sports utility vehicles (SUVs, high performance four wheel drive cars capable of off-road driving) produces a likelihood of more severe injuries when vehicles and pedestrians collide[12].

GREENWAYS

The Programme for Government sets out as vision: "*We will lead the development of an integrated national greenways strategy. This has the potential to transform modal shift and improve air quality and public health*."

The Tourism provisions of the Programme for government advance a range of specific walking and greenway initiatives.

An Taisce recommends that the following greenway schemes need to be given priority:

- The completion of the Dublin to Galway EuroVelo 2 traffic free/largely traffic free route;

[12] Simms Ciaran, O'Neill Desmond. Sports utility vehicles and older pedestrians *BMJ* 2005; 331 :787

- The rapid advancement of the coastal EuroVelo 1 from Wexford to Donegal;

- There need to be high quality greenways emanating from and leading into all of our cities and large towns. These particular greenways will tick multiple boxes in terms of catering for:
    - Visitors who have travelled over for short 'city breaks' but who want to explore the hinterlands of the cities as well as the centres;
    - Tourists starting their trips in cities but who are then travelling onwards by bike further afield;
    - Recreational cyclists based in and around the cities;
    - Commuters whose journeys align at least to some extent with the greenways built;
    - Safe routes to school ;
    - Other utility trips (cycling to the shops, pub, cultural institutions, sports etc.)/

- It is particularly important that Dublin, the capital city, has a top class offer of a network of intersecting greenways running alongside or near its most important and attractive water bodies. i.e. alongside:
    - The Liffey – a Liffey Cycle Way is crucial;
    - Grand Canal (the connection between Portobello/Rathmines and Inchicore is crucial);
    - Royal Canal;
    - The River Dodder;
    - The Santry River;
    - East Coast Trail;

- It is also crucial there are high quality safe greenways emanating out of:
    - Cork (e.g. Extending/upgrading the Blackrock to Passage West greenway to Carrigaline, Ringaskiddy and Crosshaven, a Cork City to Kinsale greenway, a Cork City to Carrigtwohill / Midleton greenway/cycle super-highway, a Ballincollig Riverside Greenway, a Blarney/Tower Greenway, a Macroom Greenway);
    - Galway (to link to Connemara via NUIG and crossing and alongside the Corrib);
    - Limerick
        - Continuing the good work of the Smarter Travel City - UL route to extend it to Annacotty; this is an existing path, but which currently deteriorates significantly along its length;
        - Further stages along the Shannon: repair / rebuild the old bridge over the Mulcair (near Annacotty), currently not safely usable; extend the path to Castleconnell and ultimately Killaloe, so as to significantly improve the Lough Derg Way, making more of it riverside and off-road;
        - As part of this, consider a foot / cycle bridge over the Shannon, at Parteen Weir;

- Waterford (e.g. by completing the 'last mile' from the fabulous Waterford-Dungarvan greenway into Waterford City centre and constructing the New Ross to Waterford Greenway);
- Sligo will be part of EV 1 and could have a spur to the Western Rail Trail which would start at Collooney.

TRANSPORT INFRASTRUCTURE

The Programme for Government states: "*In relation to new transport infrastructure, the Government is committed to a 2.1 ratio of expenditure between new public transport infrastructure and new roads over its lifetime*".

Globally and pre Covid-19 there has already been recognition that investing in roads and road vehicle capacity is unsustainable, such as the recent feature in the UK Highways Magazine: *Transport planners call time on major road schemes*[13].

Consideration for any future motorway and dual carriageway building

The first decade of the present century saw the completion of the interurban motorways between Dublin and Galway, Limerick, Cork and Waterford and substantial sections of N11, as well as the M50 lane addition. The last decade has seen the continuation of M11 bypassing Enniscorthy, the Barrow Bridge crossing below New Ross, the Gort-Tuam Motorway, and initiation of the N5 Castlebar to Westport.

At the same time there has been no progress on increasing the time and speed advantage of rail over road. All of these schemes have increased car dependence; incentivised a model of car-based urban edge retail, business parks and other development; and extended commuter belts along the route feeder corridors.

One the main strategic objectives of motorways is undermined by increased urban traffic at the inter-urban destination points and in towns and villages where inter-regional traffic is removed, only for locally generated traffic to be allowed to renew congestion.

All further road projects will need to be subject to a range of sustainability tests in relation to climate impact, preferential consideration of rail service capacity upgrade, sustainability cost benefit in advancing modal shift, and comparison with lower cost options such as bypassing towns and villages rather than new road construction.

In particular the case for the Transport Infrastructure Ireland revival of the Cork to Limerick M20 Motorway project needs to be justified, on which An Taisce has made a submission (see Appendix 2).

[13] https://t.co/nPubVVeqhC https://twitter.com/highwaysmag/status/1319568291782864896?s=27

Shared island connectivity with Northern Ireland

The State is supporting both Transport Infrastructure Ireland and local authorities in reactivating development of a transboundary Dublin to Derry motorway standard dual carriageway bringing the N2 Dublin to County Monaghan route into a dual carriageway motorway standard.

The Northern Ireland administration are advancing a new Dual Carriageway through Counties Tyrone and Derry the subject of Public enquiry in February 2020 to which An Taisce made a submission on transboundary impact (see Appendix 3).

The October 2020 *Shared Island* initiative announced by Taoiseach Micheal Martin announced that a major part of the proposed Irish Government €500 million fund would contribute to the Northern Ireland A5 project.

Two design teams are already in place for different sections of the N2 in Co Monaghan, and for a dual carriageway eastern bypass of Slane, which will not resolve east-west traffic from the N51 Navan Drogheda route through the village.

An immediate travel benefit between Dublin and Derry cold be achieved by upgrading the connectivity and speed of the Belfast, Coleraine, Derry train with the Dublin Belfast train. See Appendix 3.

Urban area and access travel

All future investment in and around urban areas needs to be directed toward decarbonisation, multi-modal travel with a major shift to active travel and public transport while reducing car use and dependence. The current €630 million Galway ring road does not meet these objectives.

TOURISM

The Programme for Government sets out a range of policies on Tourism including to: *"Develop Ireland as a long stay tourism destination to spread tourism more evenly across the country. This will help reduce emissions and maximise economic return*." In addition to the impact of Covid-19, Irish tourism faces the additional double issue of unsustainable aviation access dependence and level of car based tourism.

Developing new low GHG emissions sail-rail ferry connections with Britain and the Continent and promotion for long stay visitors should form the basis of strategic tourism planning.

In the 1990s delegates at a tourism conference in Kinsale were startled by an Austrian presenter on the concept of car free tourism. Driving in scenic areas like the Ring of Kerry was promoted internationally by motoring organisations like the AA, oil companies like Shell

and car brand advertising since the early 20th century. The reality is that prime tourist areas like Killarney suffer major congestion and in peak tourist periods.

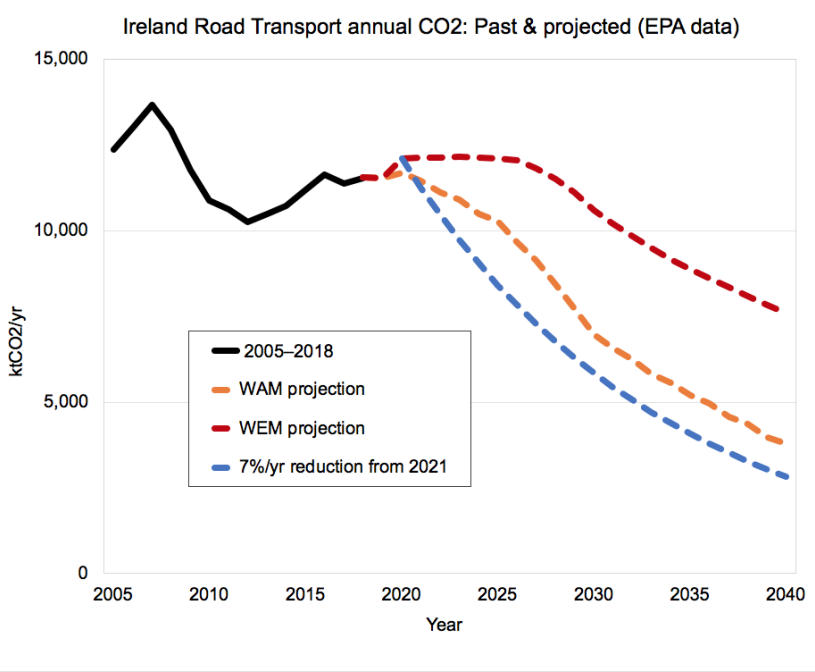
The Programme for Government highlights "*The success Wild Atlantic Way has demonstrated the potential of marketing Ireland as a clean green holiday destination.*" However, it has been problematic in encouraging long distance driving between congested stopping points often at peak periods and undermining the quality of the place and environment which visitors are seeking to experience in the first place.

The impact of continuing car tourist traffic through the Gap of Dunloe in Co. Kerry is particularly problematic with safety conflicts with walkers and cyclists. This is outlined in the An Taisce submission to Kerry County Council in August 2020 where the response was to refuse to take any action (see Appendix 4).

A new tourist model is required based on longer area based stays rather than drive through, with consequent local benefits and enhanced promotion and development of greenway safe cycling routes, and attractive walking and hiking routes for all ages and abilities.

GREENHOUSE GAS EMISSION MITIGATION

Road transport is a significant source of GHG emissions, as shown in the chart below.



Data is from EPA, with projected data from their 2020 EU Monitoring Mechanism Regulation Article 14 submission for WEM (With Existing Measures) and WAM (With Additional Measures).
WAM is the 2019 Climate Action Plan.

Page 15 of programme for Government sets out a specific heading and objectives for *"Decarbonisation of Road Transport": "To achieve our ambitious emission reduction targets we need to significantly decarbonise our transport fleet, with a particular focus on cars and light goods vehicles."*

All categories of transport require effective GHG mitigation action, including buses, HGVs, rail, shipping and aviation.

The excluding of buses and HGVs in the consideration of road transport decarbonisation is a particular concern in view of the promotion of compressed natural gas (CNG) as an alternative to diesel fuel on which we sent out extensive consideration.

Motorcars and SUVs

The September 2020 Tax Strategy Group (TSG) report "*Climate Action and Tax"* on vehicle GHG emissions also covered air pollution impacts.

The TSG report established that transport emissions are *"on an unsustainable trajectory"* and "*private cars are responsible for around twice as much annual CO2 emissions than Heavy Goods Vehicles and Light Commercial vehicles combined".* It presented the 2019 data *showing "a massive increase in the market share of SUVs" (from a market share of about 19 % in 2013 to about 45% in 2019), as well as very high volumes of used imports with above average CO" emission profile".*

The TSG set out three overarching objectives:

- *Deliver on the Government's climate action goals to the greatest extent possible*
- *Maintain a level playing field between cars tested udder the NEDC and WLTP testing regimes and*
- *Ensure the environmental health rationale in the regime, in the form of the NOX surcharge continues to act as a strong disincentive to the acquisition of highly polluting cars.*

A range of vehicle registration (including NOX surcharge), motor and company vehicle tax options were set out to meet these objectives. The most progressive measures outlined by the TSG should be adopted in ongoing budgets and integrated with climate action having the parallel benefit of air quality action.

The SUV issue

There are a number of road safety and environmental concerns arising from SUV use:

Safety: In the United States, SUVs (including pickup trucks) as a percentage of new sales now stand at 72%, and this is expected to rise to 78% by 2025. Noting that SUVs in North

America are generally bigger and blunter, there is growing evidence that the SUV sales boom in the US is associated with higher pedestrian fatalities. A study by the Insurance Institute for Highway Safety in the US found that impacts with SUVs were up to twice as likely to result in death[14].

Carbon footprint: Recently published data from WWF France indicate that SUVs sold over the last decade emitted on average 20% more CO_2 than their equivalent standard passenger car for each kilometre travelled. Similarly, over its entire lifecycle (manufacture, use and end of life), an SUV has a carbon footprint almost six times greater than that of an electric city car traveling the same number of kilometres, and five times that of an electric sedan. Across Europe as a whole, the SUV boom is the greatest contributor to rising car emissions in 2017, 2018 and 2019[15].

Battery size and emissions: Would adopting electric drivetrains for SUVs 'solve' the issues? For safety, the short answer is no. Regarding climate/environment, an eSUVs would still result in higher emissions and resource use than ordinary electric cars. This is because an electric SUV needs a 15% bigger battery than a sedan car (based on a comparison of a Tesla Model X with a Model S)[16].

The greater battery size needed for an SUV adds about two tonnes of GHGs to production emissions per vehicle. And, over its life, an eSUV in the EU will account for around two tonnes more GHGs compared to a regular sedan car (again, the comparison is based on comparing Tesla SUV v. sedan models). That equates to approximately four tonnes extra GHGs overall per vehicle (not counting the weight/volume of the raw materials themselves).

At the level of one individual vehicle, four tonnes is perhaps less significant. However, if Ireland moves from SUVs comprising 45% of new sales towards US levels (now increasing from approximately 70% to 80%), then four tonnes per vehicle puts huge pressure on our climate targets, as well as adding other resource and pollution burdens as outlined below.

Resource use, e.g. microplastics: Take tyres use as an example: tyre wear accounts for almost half of ocean micro-particles. The typical tyre consists of 24% plastic (synthetic rubber), 19% natural rubber and the rest is other materials (e.g. metal wire). Counting the wear of both rubber and plastic, "the erosion of tyres would contribute to almost half of the releases (46.2%)", according to the leading study on ocean pollution by the IUCN[17]. SUVs are one of key 'emerging threats' to tackling microplastic pollution from tyres, according to the testing laboratory Emissions Analytics: "the increased weight is also a factor associated

[14] https://www.iihs.org/news/detail/new-study-suggests-todays-suvs-are-more-lethal-to-pedestrians-than-cars

[15] https://www.transportenvironment.org/press/new-car-co2-still-rising-carmakers-push-polluting-suvs-one-year-deadline

[16] https://www.greenpeace.de/sites/www.greenpeace.de/files/publications/gp_cleanairnow_carindustryreport_full_v5_0919_72ppi_0.pdf at page 35.

[17] https://portals.iucn.org/library/node/46622

with SUVs, along with the typically larger wheel sizes adopted by such vehicles. The larger the tyres, the greater the problem"[18].

In the short term, the SUV boom is more problematic for climate emissions, as almost all SUVs have internal combustion engines. In the medium and longer term, in which it is assumed eSUVs and e-cars are the only new passenger vehicles, limiting resource use will be crucial. Conserving lithium and other raw materials will enable e-mobility for a far greater percentage of citizens, companies and society as a whole.

Vans and light goods vehicles

A special focus is required for accelerating purchase of electric vans for the building delivery and service sectors.

Taxis

A particular initiative is required to promote e-taxis, to achieve a double climate and clear area benefit in urban areas

Buses

The most progressive procurement policy should be adopted on low emission buses.

HGVs

Brussels based eNGO Transport & Environment (of which An Taisce is a member), carries out ongoing research on HGV fuel efficiency and shifting away from fossil fuel trucks to zero-emission vehicles[19]. We submit that their recommendations should be adopted.

Compressed natural gas for HGVs and buses

The European gas industry lobby is advancing CNG as fuel for HGVs and buses to substitute for petrol and diesel on the basis of gas being "clean" and "renewable".

Ireland's fossil gas dependence for the power generation industry and heating is already problematic enough without the industry seeking to develop new fossil infrastructure and dependence for transport.

[18] https://www.motoringresearch.com/car-news/car-tyres-ocean-pollution/

[19] https://www.transportenvironment.org/what-we-do/cleaner-safer-trucks

Gas Networks Ireland (GNI), in its current Ten Year Network Development Plan submitted to the Commission for Regulation of Utilities, states:

> *"Gas Networks Ireland is currently targeting at least 5% penetration of Compressed Natural Gas (CNG) or bio-CNG for commercial transport and 10% of the bus market in Ireland by 2025. By the end of the current NDP period (2027/28), Gas Networks Ireland is expecting to see annual CNG demand of circa 0.8 TWh/yr. Gas Networks Ireland is conducting a project for a nationwide CNG fuelling network, co-located in existing forecourts, on major routes and/or close to urban centres. This will help satisfy the requirements of the EU's Alternative Fuels Directive which aims to establish CNG refuelling facilities along the TEN-T Core Road Network. The initial phase of this network rollout is through the Causeway Study which has begun to deliver this essential infrastructure. The CNG Stations will be strategically located to deliver the required outputs of the Causeway Study and to maximise utilisation of the assets".*

There is no climate mitigation or business case for promoting or developing compressed natural gas infrastructure. The use of compressed natural gas (CNG) in transport will not achieve the level of emission cuts required. Developing CNG infrastructure would perpetrate the continued extraction and combustion of fossil gas lock-in, and impede the alternative of electric transport from renewable energy generation.

In its own promotional information advocating CNG for transport, GNI is able to claim only a 22% reduction in fossil emissions.

See Appendix 5 on the sustainability of CNG and biomethane.

TRANSPORT INFRASTRUCTURE IRELAND AND NATIONAL TRANSPORT AUTHORITY

The delivery of the new objectives of the Programme for Government and climate action require reformed institutional structures.

Transport Infrastructure Ireland was created through the merger of National Roads Authority and Rail Procurement Agency.

The legal mandates of Transport Infrastructure Ireland and National Transport Authority need to be revised to provide an overarching obligation for decarbonisation and climate action, a modal shift to active travel and public transport, and other sustainability obligations.

In particular it is necessary to ensure that all new development proposals having transport generation needs are property assessed with regard to climate action, and achieving modal share to active travel and public transport.

Transport Infrastructure Ireland (TII) was mandated as a prescribed body to consider planning applications affecting the safety and operational integrity of national roads. In cases where it considered a particular scheme would have an adverse impact on traffic junction tailbacks it is open to appeal the decision to An Bord Pleanála, which it has in some cases.

However, in a major case TII failed to appeal a South County Dublin decision contravening its advice in the case of the Liffey Valley shopping centre extension having an adverse impact on N6 and M50 traffic generation. It was left to An Taisce to appeal citing TII concerns. This case reveals the needs for co-oriented transport policy and planning between the Department of Transport, TII and NTA and local authorities.

The recent public consultation response to the National Transport Authority publication of the "Draft Limerick Shannon Metropolitan Area Transport Strategy 2040" has resulted in a widely negative political and local organisation reaction from the Limerick region, summarised on an October 2020 RTE report (see Appendix 6). The overall critique was that the draft strategy lacked ambition and alignment with the Programme for Government. This highlights the need for institutional reform of the entire strategic planning and delivery regime in Ireland encompassing TII, NTA and Regional and Local Authorities.

FUTURE OF PORTS, PORT ACCESS AND SHIPPING

The Programme for Government references *National Ports Policy 2013* in stating: "*we will work with our port companies to ensure that they have the capacity finance, and policy supports to deliver in the years ahead*";

and also "*review potential to expand passenger and cargo capacity at all of our ports, prioritising rail connections and interchange*";

and *"work to ensure that ferry companies provide access to foot passengers without cars*."

Considerations required to inform current port and new port policy

Brexit

The impact of Brexit is as yet uncertain in creating alternative demand for direct transit routes from Ireland to the Continent, bypassing Britain.

The two Tier 2 ports in the South East, Rosslare and Waterford have potential to accommodate increased direct traffic to and from the Continent. However, there is a draught limit in Rosslare, which poses a constraint for larger vessels. There is also the physical constraint of the location, which was developed in the early 20th Century as a rail connected passenger port to Britain.

Changing cargo needs

Longstanding port cargos like coal and oil imports will come to an end as climate action advances. There is no sustainability case for importing biomass. Ireland also needs to cease animal feed import and produce more varied food products for home consumption to reduce import dependence. The October 2020 Dutch restriction on Irish live calf exports indicates future constraints.

Maximising shift of port traffic to rail use is desirable

The Tier I ports of Dublin and the older Cork upriver port area were developed in the late 19th Century for rail access are no longer used. Cork, since the relocation of its major transit to Ringaskiddy, has been developed on the basis of road access only.

Waterford and Rosslare Tier 2 Ports have rail access, but the latter has major constraints. The continued designation of Dublin to Rosslare as a transport Euro route must be questioned if Rosslare is constrained in extra bulk transit capacity, and therefore the justification of continuing the N11 Motorway project to Rosslare. Waterford Port is underutilised and has the best designed rail to berthage interchange in the country, it accordingly has major potential for rail.

Justification for status of Limerick Foynes as Tier 1 Port

A review is required of the appropriate designation Foynes as Tier 1 Port. The tonnage throughput justifying Tier I statues includes the ESB coal jetty at Moneypoint which will be phased out of use to meet climate targets and the bauxite handling jetty at the Aughinish Alumina plant. The actual tonnage of direct port traffic at the Foynes berthage does not warrant Tier 1 status.

Furthermore, much of the bulk material imported through Foynes has no sustainable future for the decade ahead:

- Coal and biomass imports need to cease as part of a national renewable energy strategy;
- Continuing animal feed import is unsustainable as Ireland needs to produce its own;
- Fertiliser use needs to be reduced under current EU *"A Farm to Fork"* food and agricultural strategy;

For this reason the current business case to build a dual carriageway to Foynes from Limerick has not been made. If there is a business case for increased bulk traffic being appropriately brought in and out of Foynes, then this should be based on restoring the railway line for freight which would obviate the need for the proposed dual carriageway.

Justification for Galway Port Company commercial harbour development

Galway Port Company is proposing a 53 ha infill to Galway Way for a commercial port project to include oil and bitumen terminals and cruise liner berthing. Galway Port has good though unutilised rail access but no road connection to the M6 on the N18. Extra HGV traffic though the inner urban area would not be justifiable on transport access grounds rendering the port area unsuitable for commercial traffic expansion. The major industries in Galway such as medical devices do not require proximity to a bulk transit port.

Galway Port development also faces the *IROPI* test under the Habitats Directive as the expansion has been deemed to have a negative impact on the designation and ecological status of Galway Bay Special Area of Conservation and SPA. Development can only be justified when it is a matter of overriding public importance, and there are no alternatives. It is submitted that the strategic development case has not been made in relation to the Galway project.

Foot passenger ferry access

Given the high emission impact of aviation and undesirability of increased car-based tourism congestion in the most scenic areas, the promotion of foot or cycling passenger sea travellers for longer stay visits is desirable.

Current restrictions on foot passengers (including cyclists) on some Irish Sea and Continental ferry routes should be removed as having no practical or operational justification.

Shipping, greenhouse gases and air pollution

Shipping, along with aviation, was excluded for the Paris Agreement 2015. However, if effective climate action is to be achieved all sectors must be included. In addition to GHG impacts, shipping consumes polluting bunker fuel. Shipping is a growing source of transport greenhouse gas emissions and a major source of air pollution, causing health problems, acid rain and eutrophication.

An Taisce is a member of the Brussels based Transport and the Environment (T&E), which works together with other members of the Clean Shipping Coalition to reduce air pollution and climate impacts of shipping globally and in Europe. Sweden and Denmark are pioneering electric ferries, so far for shorter routes and of smaller draught[20].

As a maritime nation Ireland should be party to international research and prototype development of low emission shipping. In particular, the development of low emission sail rail connection from Dublin to Holyhead and the British railway system should be advanced as a cross-Irish Sea cooperative action.

[20] https://www.euractiv.com/section/shipping/news/denmarks-e-ferry-passes-sea-trials-in-style/

AVIATION

The Programme for Government recognises "*the value of our aviation sector in supporting economic development, international connectivity and tourism via, our airports".*

As specific objectives it states that: "*We will*...

> "*deliver the capital programmes required to support services and ensure safety at our state and regional airports"*
>
> And "*Support EU and international action to reduce aviation emissions, in line with the aims of the Paris Agreement and the UN Framework Convention on Climate Change*".

Lobbying by the international aviation sector resulted in aviation being excluded from the Paris Agreement in 2015. The International Civil Aviation Organisation (ICAO) is advancing what is an entirely inadequate response to its responsibility for global climate action through the CORSIA carbon offsetting scheme and only for post 2020 aviation growth.

Before Covid-19 aviation both in Europe and internationally was increasing its emission impact on an unsustainable trajectory, without any meaningful mitigation. Aviation has now been affected to a particular degree by the pandemic.

In July 2020 the Brussels based European NGO Transport & Environment of which An Taisce is a member published a report on how the post Covid recovery of aviation should be managed[21].

It set out as overarching recommendations:

- *Credible forecasts of future growth are needed, taking into account changing attitudes towards travel in the leisure and corporate sectors. This would ensure investments are directed appropriately, preventing unnecessary lock-in investments such as airport expansion.*
- *Measures adopted should ensure that existing employment is protected and, when developing strategies for the future, prioritise the creation of employment in areas relating to decarbonising aviation.*
- *Measures adopted, such as state aid guidelines, Covid Recovery Funds and the EIB lending review, should direct investment towards greening the sector.*

The application of the these principles to Ireland means:

- The growth projections for proceeding with the Dublin Airport North Runway project can no longer be justified.

[21] https://www.transportenvironment.org/publications/aviations-covid-recovery-sustainability-and-resilience

- Climate action responsibility by the leisure and corporate sector redirecting tourism promotion focus on longer stays rather than regular short trips during the year, and more use of video link for corporate meetings.

- Reducing aviation connection dependence by international cooperative action for low-emission sail and rail connectivity with Britain and the Continent.

APPENDICES

APPENDIX 1

An Taisce 2020 report to OECD on sustainable transport

https://drive.google.com/file/d/17VuwmNadCn0Q4hGx36NP3B8ZRehqoqVZ/view

APPENDIX 2
Submission to Transport Infrastructure Ireland
on M20 Cork Limerick October 2020

Cormac O'Rourke, Chair
Transport Infrastructure Ireland
Parkgate Business Centre
Parkgate Street
Dublin 8

23rd October 2020

Re. Cork to Limerick Motorway

Dear Mr O'Rourke,

We wish to raise a question and request your response on the ethical and sustainable investment justification of Transport Infrastructure Ireland directing further resources to Barry Transportation and its partners SWECO and WSP (BSW), who have been appointed by Limerick City and County Council with TII funding to advance a new motorway scheme the M20, rather than bypass existing urban and village congestion points.

Further to your consideration of:

1. The climate and biodiversity loss emergency and the misdirection of resources which further over-scaled road building would create;

2. The objectives of the Department of Transport policy, Smarter Travel:

> *Future population employment growths will predominantly take place in sustainable compact forms which reduces the need to travel for employment and services;*
>
> *500,000 more people will take alternative means to commute to work to the extent that the total share of car commuting will drop from 65% to 45%;*
>
> *Alternatives such as walking, cycling and public transport will be supported and provided to the extent that these will rise to 55% of total commuter journeys to work;*
>
> *The total kilometres travelled by the car fleet in 2020 will not increase significantly from current levels;*
>
> *A reduction will be achieved on the 2005 figure for Greenhouse gas emissions from the transport sector.*

and given the failure of these targets, the retrospective action now required in reducing car use and dependence;

3. The objectives set out on page 14 of the June 2020 Programme for Government that "*The Government is committed to a 2:1 ratio of expenditure between new public transport infrastructure and new roads over its lifetime*" and the level of funding committed to schemes in progress, already approved or in planning with An Bord Pleanála, such as the Galway Ring Road (where the original projected 630 million cost is likely to be significantly higher arising from the multiple issues arising from the An Bord Pleanála Oral hearing in progress, in the event of any consent being granted);

4. The alternative of resolving traffic issues in Buttevant and Charleville with local bypasses;

5. The inspector's report on the previous aborted M20 scheme which stated:

> *"REASONS AND CONSIDERATIONS*
> *1. It is considered that the proposed road development would transfer a very significant level of additional traffic on to the road network in the northern suburbs of Cork City and would, having regard to capacity deficiencies on that network, and also to the absence of any definitive timeframe for the completion of associated and necessary road infrastructure schemes, give rise to unacceptable traffic congestion in the north Cork suburbs. The proposed road development would therefore be contrary to the proper planning and sustainable development of the area.*
>
> *2. Having regard to the National Policy Document Smarter Travel and in particular to the commuting policies set out at chapter 3 therein which seek to reduce the modal share of work related car commuting, and having regard to recorded decrease in traffic volumes for the Croom bypass section of the proposed M20 from Anhid Cross to Attyflin, it is considered that the developer has failed to demonstrate the need to replace the recently constructed Croom bypass by the proposed Motorway. The proposed development would therefore be contrary to the proper planning and sustainable development of the area.*
>
> *3. It is considered that the proposed road development by virtue of the proposed junction arrangement at Fanninstown would, having regard to existing volumes of traffic on the local road from Croom to Fanningstown through Caherass be likely to generate an unacceptable increase in traffic on that local road. The proposed road development would therefore be contrary to the proper planning and sustainable development of the area.*

4. Having regard to;- (i) NRA noise limit value of 60dB Lden for new roads as set out in the 2004 Guidance Document, which limit is considered reasonable and Cork to Limerick Motorway M20 PL 04.HA0027/04.MA0010 An Bord Pleanála Page 248 of 392 (ii) The Environmental Noise Directive (2002/49/EC) which requires the provision of Noise Action Plans for major roads which have more than six million vehicles a year, It is considered that the proposed Motorway which is a new road, would, by reason of the failure characterised by high noise levels would, by reason of the failure to achieve noise levels below the limit value at residential properties adjacent to the road throughout its entire length, would give rise to unacceptable noise impacts on a substantial number of residential properties.

5. Having regard to articles 3 and 5 of the EIA Directive which relate to interactions and examination of alternatives, the proposal fails to adequately examine public transport alternatives, in particular a rail alternative or a combination of rail and road."

We look forward to your consideration and response

Yours sincerely,

Ian Lumley
Head of Advocacy
An Taisce – The National Trust for Ireland

APPENDIX 3

Submission on A5 Tyrone Derry Dublin Motorway / Dual Carriageway Public Enquiry Feb 2020

Submission on Transboundary Impact of
Northern Ireland 85km A5 Dual Carriageway Scheme
PRESENTED TO PUBLIC ENQUIRY OMAGH FEBRUARY 2020

The National Trust when originally constituted in 1895 covered the entire area or the then UK. An Taisce the National Trust for Ireland was registered as an independent entity in 1948, and holds property which has been bequeathed to the National Trust in 1905.

An Taisce is currently receiving the donation of the major area of peatland forming Sliabh Beagh on the Monaghan Tyrone border, in an area which is suffering ecological damage through ammonia pollutions. An Taisce also holds significant properties in Co Donegal and has a particular concern in reducing the adverse impact of car based tourism in favour of public transport access and promotion of walking hiking and cycling locally

An Taisce is a member of the Brussels Based European Environmental Bureau, Transport and the Environment and Climate Action Network (CAN) Europe, which are advocacy organizations for sustainable development at international level

An this basis the remit of An Taisce extends to all areas of transboundary greenhouse gas emissions, ecology, energy projects , transport generation and resource consumption.

DOES THIS SCHEME ADDRESS THE GLOBAL SUSTAINABLE CHALLENGE OF CONVERGING CLIMATE BREAKDOWN AND BIODIVERSITY LOSS ?

Preliminary consideration of strategic investment priorities for the climate and biodiversity loss emergency

This application must meet a preliminary sustainable development test.

Future Earth, an international sustainability network, conducted a study[22] involving surveying 222 scientists from 52 countries which found that a "perfect storm" of climate breakdown, extreme weather, species loss and a food production crisis is imminent, whereby the combination of the above threats amplifies the risk posed by each individually. Moreover, Future Earth concluded that governments, business, civil society, etc. do not adequately recognise the inextricably linked nature of these threats.

[22] Future Earth (2020) Our Future On Earth: https://futureearth.org/publications/our-future-on-earth/

The United Nations' Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (ISPPBES) released a report[23] in May 2019 on global biodiversity, which found 75% of terrestrial environments and 66% of marine environments have been "severely altered" by human activities. The report also found that one million of the planet's approximately eight million animal and plant species are now facing the threat of extinction, many of them within coming decades.

Both UK and Ireland are party to the Paris Agreement 2015 on Climate and the 2015 UN Sustainable Development Goals.

Paragraph 7 of the UK National Planning Policy Framework (July 2018) ("the NPPF"), adopting the definition used in Resolution 42/187 of the United Nations General Assembly ("the Brundtland definition") and in substance replicating the earlier version of the National Planning Policy Framework (March 2012), states: *"… At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs."* The NPPF goes on to say that achieving sustainable development means that a planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways, namely an environmental objective, an economic objective and a social objective.

Northern Ireland strategic policy requires significant updating to address the UN Sustainable development Goals.

Similar consideration applies to the implementation of The UK Climate Change Act 2008

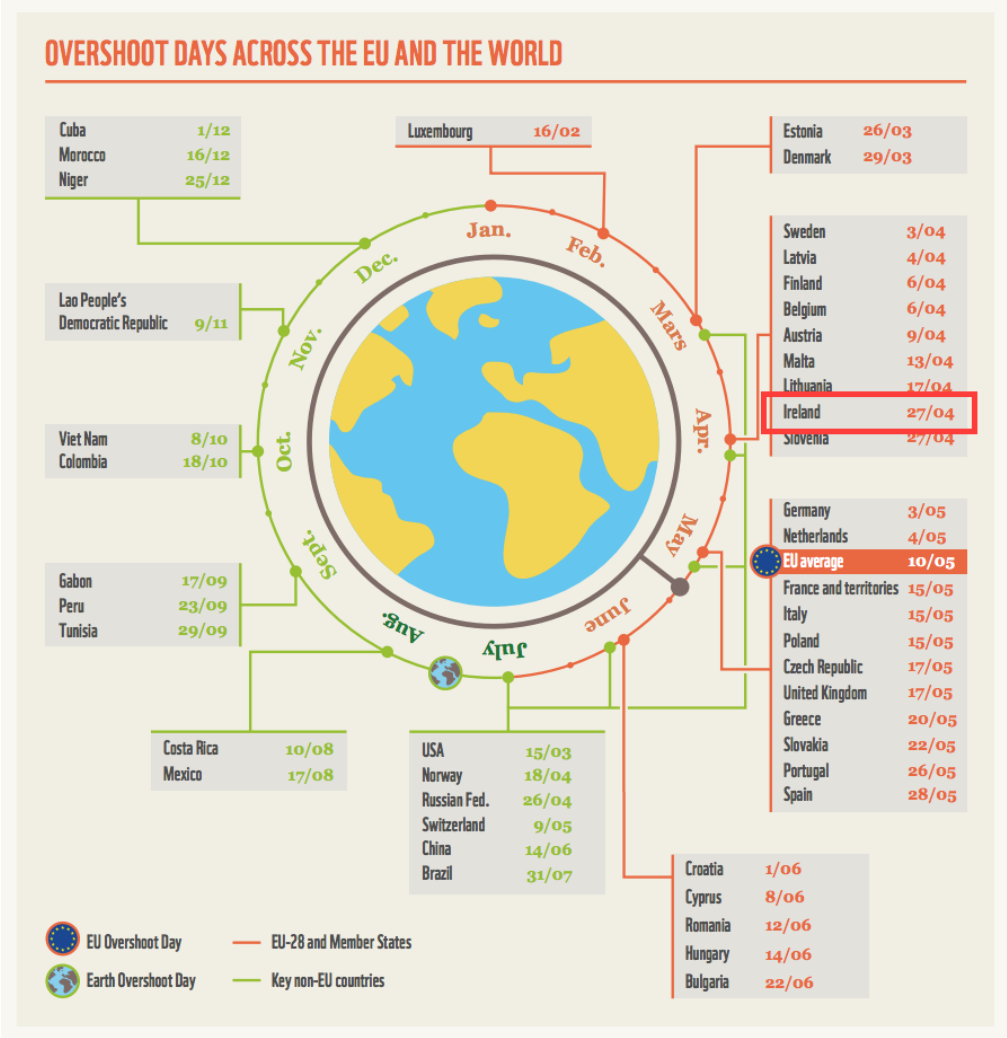
http://www.legislation.gov.uk/ukpga/2008/27/contents

It needs to be determined to what extent the provisions of the 2008 Act are being applied in Northern Ireland

Despite adopting the 2015 Paris Agreement and UN SDGs in 2015 , neither the EU, UK or Ireland are taking the level of action required. We are facing accelerating biodiversity loss, and we have a transboundary resource consumption and trade impact, which is breaching planetary environmental footprints on a disproportionate per capita basis[24]. The following chart details the "Earth overshoot day" for a range of countries. The overshoot day measures the date each year upon which humanity would have used up as much from nature as the planet can renew in one year if everyone in the world had the same ecological footprint as the subject country. UK 2019 overshoot day fell on May 17th. Ireland's overshoot day fell on 27th April, a worse performance than the EU average.

[23] Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services 2019 report: https://www.un.org/sustainabledevelopment/blog/2019/05/nature-decline-unprecedented-report/

[24] WWF (2019) EU Overshoot Day, 10 May 2019: Living Beyond Nature's Limits: https://www.footprintnetwork.org/content/uploads/2019/05/WWF_GFN_EU_Overshoot_Day_report.pdf



The onus is now on developed countries including UK and Ireland to reduce greenhouse gas emissions by over 7% annually[25] which is the level determined by the United Nations Environment Programme to avert catastrophic global heating, and to reverse biodiversity loss which is so evident in all parts Ireland through continuing insect population decline, and wher the impact of industrial animal agriculture is so problematic

In 2019 ,the UK Office of National Statistics (ONS) published a report on Road Transport

https://www.ons.gov.uk/economy/environmentalaccounts/articles/roadtransportandairemissions/2019-09-16

[25] United Nations Environment Programme (2019) Emissions Gap Report 2019: https://wedocs.unep.org/bitstream/handle/20.500.11822/30797/EGR2019.pdf?sequence=1&isAllowed=y

Main points in the report were

- Reducing emissions from road transport remains a significant challenge as the UK looks to reach net zero emissions by 2050; at the end of 2018, 0.5% of all vehicles licensed in the UK were ultra-low emission vehicles.
- Road traffic in Great Britain increased from 255 billion miles travelled in 1990 to 328 billion miles in 2018, an increase of 29%.
- Total fuel used for road transport in the UK remained relatively stable from 1990 to 2017 as the fuel efficiency of newer vehicles has improved; whilst petrol use declined over this period, diesel use has increased.
- Greenhouse gas (GHG) emissions from road transport in the UK have increased more slowly than the increase in road traffic, increasing by 6% from 1990 to 2017.
- In 2017, GHG emissions from road transport made up around a fifth of the UK's total GHG emissions.
- Emissions of many pollutants that are particularly damaging to health (carbon monoxide, particulate matter and nitrogen oxides) have reduced following increasingly stringent exhaust emission limits.

The investment priorities for UK and Ireland should therefore be:

1. Placing the health and wellbeing of communities at the heard of all decision-making in accordance with the principles set out in Sustainable Development Goal 11. This would include major initiatives in:
    - Energy efficiency;
    - Reduction in dependence on private car use;
    - Enhancing plant based food production in grains, fruits, vegetables pulses and nuts and other oil or protein producing plants; and
    - Large sale biodiversity enhancement including native woodlands

2. Prioritising the reduction of energy use and demand while increasing efficiency as a first principle.

3. Achieving the required targets for decarbonising electricity generation, heating and transport. Reduction in aviation, for which there is no sustainable mitigation, is also required.

Continued over-scaled road building would represent a misdirection of limited investment resources, when we need to address the accelerating global climate and biodiversity loss emergency.

STRATEGIC POLICY JUSTIFICATION FOR A5 SCHEME

The overarching policy applying to Sustainable Transport in Northern Ireland is "*Ensuring a Sustainable Transport Future*" 2012 by the Department for Regional Development

Strategic Objective 2: *Use road space and railways more efficiently*

sets out a number of considerations:

" *There is finite capacity on the network*

On roads, the choice is whether to continually try to meet increasing demand by building new roads or to manage demand for road space and find innovative ways of getting the best use we can from our infrastructure "

If we succeed in encouraging individuals to use public transport or car share for longer journeys and to walk or cycle for shorter journeys, then we reduce the number of journeys made by car."

The December 2019 Department for Infrastructure "Traffic Forecast "submission does not address this policy which if effectively implemented should, be achieving a progressive reduction in car use since 2012. Instead 2015 traffic figures are now being presented as the baseline for traffic forecasting for the scheme

Under the core object to Reduce the Environmental Impact of Transport is sets out three requirements :

Reduce Greenhouse gas emissions from transport

Protect biodiversity

Reduce water, noise and air pollution

The 2019 WSP Outline Business case sets out in Table 4/1 how the 85km dual carriageway would align with a number of *Ensuring a Sustainable Transport Future*" 2012 objectives bot does not address the three overarching environmental objectives

The need for removal of A5 through traffic through Syon Mill is not in dispute.

Equally, the growing unsustainable level of private car use neds to be addressed at international level , including in transboundary action.

In March 2010 Northern Ireland Assembly Minister Conor Murphy for Regional Development advanced this concern in addressing a seminar on sustainable transport

" *it is clear that current patterns of transport in the north and the high level of dependency upon the provide car are not sustainable, economically , socially or environmentally* "

The policy response to this should be to reduce car use and dependence locally regionally and in transboundary transport.

TRANSBOUNDARY TRAFFIC GENERATION FROM CO MONAGHAN TO CO DONEGAL

The WSP Sept 2017 " Outline Business Case" which is being use to justify the scheme do so on the basis of transboundary benefit as well as within Northern Ireland :

Section 4.1.7. states

"The Proposed Scheme would facilitate the movement of people and goods along a modern, high quality corridor and improve access to international gateways at Londonderry Port and City of Derry Airport in the north and the Republic of Ireland in the south and the north-west, and to market towns and tourist areas."

Section 4.4.22 in referencing NI Economic Strategy: Priorities for sustainable growth and prosperity, page 68, para 5.78 (2012) and Investment Delivery Plan for Roads, page 3, paragraph 1.3 (2015) states :

"Hence, the Plan acknowledges that in order to deliver a strong, modern economy, an upgrade to all of the Key Transport Corridors (see Section 4.2), including the A5, to at least dual carriageway standard is required. It recognises that an improved A5 will provide significant benefits to the north west of Northern Ireland by improving linkages to and from Dublin and greatly improving journey times within the north."

And

"*Table 4-4 shows that there are high proportions of heavy vehicles on the existing A5 towards Londonderry and the border with Republic of Ireland at Aughnacloy. These are recognised as international gateways and demonstrates the corridor's importance as a strategic link between the north and south of Northern Ireland.*

The potential of redirecting any part of this freight movement from Dublin to the existing rail system to Londonderry is not addressed

The effect of road investment increased road vehicle use and dependence leading to the long accepted impact of "Induced traffic"

The modelling of the A5 scheme does not properly address the impact of inducing transboundary traffic from Co Monaghan to Co Donegal , and on the wider N2 route from Dublin to Co Monaghan, through Northern Ireland to Co Donegal

Irish Transport policy has similar objectives to NI "*Ensuring a Sustainable Transport Future*" 2012. Irish policy is sent out in Department of Transport **Smarter Travel -A**

Sustainable Transport Future (2009 – 2020)[26], a national policy set out by the Department of Transport in 2009. It contains clear targets to stabilise the total kilometres travelled by the national car fleet at 2009 levels, for example, reducing the overall national figure for car based workplace travel from 65 % to 45% by 2020. It set out 49 specific actions with five key goals:

i. to reduce overall travel demand;
ii. to maximise efficiency of the transport network;
iii. to reduce reliance on fossil fuels;
iv. to reduce transport emissions; and
v. to improve accessibility to transport.

The meeting of these objectives require that further road investment nationally should be restricted to urban bypasses and relieving congestion and accident risk points. Instead as in Northern Ireland there has been a deliberate policy of failing to build bypass loops around towns is in order to justify the building of motorways and dual carriageways.

The effect of the A5 proposal would be to have a transboundary impact to induce additional car traffic from the Dublin and Monaghan area through counties Tyrone and (London) Derry to Co Donegal

Ian Lumley
Head of Advocacy
An Taisce – The National Trust for Ireland

[26] SmarterTravel: A Sustainable Transport Future (2009 – 2020): http://www.smartertravel.ie/content/smartertravel-policy-document

APPENDIX 4

Submission to Kerry Co Co on August 2020 tourist car safety and amenity impact on Gap of Dunloe

Moira Murrell
Chief Executive
Kerry County Council
County Buildings
Rathass
Tralee
Co. Kerry

25th August 2020

Sent by email to: lsheehan@kerrycoco.ie

RE: Request for health and safety action intervention to de-designate Gap of Dunloe to through motorcycle traffic and as access route for "tourist" and "recreational" drivers by Kerry County Council

Dear Ms Murrell,

We request your intervention to avert a continuing public safety risk which needs to be address and for which this letter is both a formal and public notice which is being copied to the Road Safety Authority, Killarney Gardaí and the Tourism Minister.

The continued access to and through the Gap of Dunloe to non-local residents and service access need vehicles has passed the tipping point of both injury risk and general unsustainably.

The wider impact of "tourist" and "recreational" driving in noise and higher polluting SUVs and "rally" cars is incompatible with the road alignment, ecological and landscape sensitivity and amenity of the Gap of Dunloe.

There is a prima face and avoidable safety conflict with walkers, pony cars and cyclists. This can be averted by de-designating the Gap road as an access and through traffic route. Appropriate provisions can be made for residents, farmers, tourist accommodation guests and service vehicles requiring access to the Black Valley through a permit or controlled system.

The unsustainably of the current situation was evident in a visit by the undersigned on the afternoon of Sunday, August 23rd 2020. On the steep southern side approach, the tailback lines of cars treating the Gap as a driving circuit were stacking up to six in each direction creating a major passing problem. On the northern approach a high

proportion of car entrants were driving to the summit point before reversing back, thus doubling the adverse impact on the area of the gap most used by walkers.



There was a significant presence of "rally" cars, including four that were operating as a convoy group stopping regularly. These cars cause significantly worse noise and air pollution in comparison to other vehicles, as well as public safety and anti-social impacts.



On the northern end served from Kate Kearney's cottage by the traditional pony cars, and where there was a much greater concentration of walkers, the high number of cars was creating an irreconcilable conflict.

This is at a time when access to clean air and healthy outdoor recreation is so important. The pony cars have been a feature of the gap visitor experience since the mid 19th Century, as shown in the early 20th Century photograph below.



This important contribution to local employment and equine culture is now endangered by the worsening impact of the Gap becoming a polluting motor driving circuit. Kerry has more than enough tourist motorcar driving routes.

We are writing to you on the Gap of Dunloe safety issue as a matter requiring urgent and immediate intervention. Apart from the safety risk, there is no justification or need for "recreational" car access to the summit of the Gap or its inclusion in a driving circuit.

We request information as to what action you are taking in response to the public safety and general issues raised in this submission.

Yours sincerely,

Ian Lumley
Head of Advocacy
An Taisce – The National Trust for Ireland

APPENDIX 5

Transport and Environment (T&E) Compressed Natural Gas and Biomethance Sustainability research

A 2018 report by the European NGO Transport and Environment (T&E), of which An Taisce is an affiliate member, carried out extensive research on the sustainability of CNG and use of biomethane for vehicles[27]. It set out the EU policy background and objectives of the report:

> *"The EU has agreed to cut its greenhouse gas (GHG) emissions by at least 80-95% by 2050 and was the driving force behind the Paris Agreement which requires net zero emissions by the middle of the century. Climate policy will require a shift away from petroleum which currently provides nearly all of transport's energy needs. Apart from a transition towards zero emission technologies such as battery electric or hydrogen, regulators and governments across Europe are considering what role gas could play in decarbonising transport.*
>
> *The EU and several national governments support the use of methane in transport through regulations, tax breaks and subsidies. The gas industry - which is faced with stagnating or declining demand in other sectors in Europe – sees transport as a major growth market.*
>
> *This report compiles the latest evidence on the environmental impacts of using gas as a transport fuel. The report is based on the most up to date literature, test results and data. It builds on a previous report by AEA-Ricardo but analyses in more detail issues such as the role of renewable methane (biomethane and power-to-methane) or the impact of tax policy."*

With regard to climate impacts the T&E report states:

> *"Gas vehicles and vessels have similar performance to other fossil fuelled vehicles and vessels. Based on the latest available evidence fossil gas used in transport has no meaningful benefit- and when including methane leakage and upstream effects in almost all cases - no climate benefits compared to petroleum-based fossil fuels.*
>
> *The overall (well to wheels/WTW) GHG performance identified in this study (with the medium upstream emissions) range from -12% to +9%, depending on the mode of transport. In cars, the GHG savings range from -7% to +6% compared to diesel. In heavy duty, the range is -2% to +5% compared to best in class diesel trucks and depending on the fuel and engine technology. In shipping, the figures are -12% to +9% compared to marine gas oil (MGO) but these figures are highly dependent on*

[27] https://www.transportenvironment.org/publications/natural-gas-powered-vehicles-and-ships-%E2%80%93-facts

methane slip.

We did not find any evidence supporting the theoretical savings of gas vehicles, which are based on the lower carbon content of the fuel. In reality poor gas engine efficiency often offsets the benefit of the fuel already at tailpipe level. This points to the need for policies based on measured performance (through the EU's official tests), not the type of fuel. Uncertainties also exist regarding methane leakage at the vehicle level and the impact of boil-off and venting is not well documented but could have a significant negative impact on gas vehicle's environmental performance.

Methane is a very powerful greenhouse gas. Over a period of 100 years it is 28 times more potent than CO2. In 2010 methane accounted for 20% of global GHG emissions. These (550 Mt) emissions are growing annually by 25 Mt, with 17Mt of the growth linked to fossil fuel extraction.

Methane leakage - i.e. unburnt methane leaking into the atmosphere - occurs throughout the supply chain (extraction, transport, refueling) and has a large and negative climate impact. Currently the average fugitive methane emissions in the supply chain of fossil gas are 2.2% of fossil gas produced, ranging from 0.2% to 10%.

Recent evidence suggests that upstream methane emissions have been significantly underestimated - by up to 60%, making it likely that CNG/LNG upstream emissions and subsequently well-to-wheel or wake GHG emissions are worse than the abovementioned numbers (which are based on 'central' upstream emissions data). Given that methane is a very potent short term greenhouse gas any benefits from gas vehicles would only materialise several decades into the future, well after the EU economy would need to be fully decarbonised."

The report concluded:

"*There are only limited air quality benefits from using fossil gas in road transport. Gas vehicles perform similarly to petrol cars and only marginally better than diesel cars in terms of compliance with the new RDE limits. The European Commission is working on a Euro 7 limit which will further decrease or entirely eliminate any benefit gas has over diesel cars. Far greater air quality improvements could be achieved by switching to zero emission cars.*

For trucks, CNG and LNG offer no meaningful benefits (NOx, PM) compared to vehicles complying with the Euro VI standard. HPDI (high pressure direct injection) truck technology has slightly higher NOx emissions. Particle number emissions are also higher in methane-powered transport, compared to diesel. For ships LNG has a clear benefit compared to heavy fuel oil although similar emissions performance can also be achieved by fitting ships with after treatment systems such as SCR and DPF and using low Sulphur marine gas oil."

GNI, in common with gas industry interests across the EU, is promoting the concept of injecting a quantity of agriculture or crop based biomethane into the existing fossil gas network and branding this "renewable gas".

There is no "renewable" gas source, as all models require a production chain and have an emissions path. Biomethane is not a genuinely renewable energy source whether produced from animal effluent or a crop such as grass, and there is major greenhouse gas (GHG) impact from the fertilisation of grassland or other crops, as well as other emission leakages. Gas produced from waste is not renewable, especially if it monetises unsustainable agricultural practices. In any case, overarching sustainability policy including the UN Sustainable Development Goals provides for the reduction of waste, therefore any by-product capacity from waste will become more limited in the future.

In Ireland, biomethane projections are predicated on maximising nitrogen fertiliser use on land to grow more grass (in addition to the 35% increase in N-fertiliser use already seen since 2010 for herd expansion), thereby increasing nitrous oxide (N2O) GHG emissions even further. Adding the effect of methane leaks from anaerobic digesters (see section 3.2.4 below) means that the effect of these potent GHGs is likely to greatly reduce or cancel the claimed CO2 climate benefit of using biomethane instead of fossil fuels.

Internationally, so called renewable gas is also problematic in supply sustainability, competing with food production for land, and will not achieve the level of emission reduction needed to meet Paris Agreement implementation targets. It perpetuates and prolongs a lock-in to fossil gas infrastructural development and consumption, and inhibits investment and deployment of low carbon renewable alternatives, particularly for heating and transport. This is outlined in a Corporate Europe 2018 report[28].

GNI seeks to address greenhouse gas emissions through the draft strategy's proposition of a 20% target for injection of primarily animal agriculturally sourced biomethane into the gas pipeline system by 2030.

The sustainable use of all bioenergy sources, as much as sustainable production and sourcing, needs assessment for the optimum advancement of decarbonisation.

Sustainable use of biomethane

GNI have not demonstrated the required double sustainability test for biomethane, which applies to end use much as production.

The meeting of climate and other sustainability targets requires substitution of fossil energy including gas for renewables, and substitution of animal-based nutrition for plant-based nutrition. The most effective advancement of decarbonised energy is to achieve complete substitution of a fossil energy source whether for electricity, heating or transport. Dilution

[28] https://corporateeurope.org/climate-and-energy/2018/10/part-1-dangerous-distraction-renewable-gas-keeps-us-fossil-fuel-path

whether 10%, 20% or higher is problematic in perpetuating fossil fuel use supporting continued investment in and lock-in to old combustion technologies. The effect it has is to prolong use of fossil fuel whether for electricity generation, heating boilers or internal combustion engine vehicles, thus undermining a full switch to alternative renewable technologies in electricity generation, heating or transport.

The alternative options of using any sustainably produced biomethane in electricity generation, as the sole fuel for HGVs, in local/district heating systems, or in an industrial plant in the local area of its production, to substitute for fossil combustion needs to be properly assessed.

The 2018 T&E report[29], in considering the limited availability of sustainably sourced biomechanics, stated in conclusion:

> *What potential exists might be better used to help decarbonise sectors that currently depend on methane (residential, industry, power) and where no new infrastructure and engines are needed. Biomethane in transport can play a niche role in local projects, with vehicles running on 100% biomethane, refueling at local biomethane production sites. A wider shift to methane will almost certainly lead to a transport sector powered by fossil gas, not renewable methane".*

[29] https://www.transportenvironment.org/publications/natural-gas-powered-vehicles-and-ships-%E2%80%93-facts

APPENDIX 6

RTE REPORT OCTOBER 2020: OPPOSITION TO PROPOSED LIMERICK SHANNON METROPLITIAN AREA TRANSPORT STRATEGY 2040

https://www.rte.ie/news/regional/2020/1029/1174723-limerick-shannon-transport-system/

There has been widespread opposition to the Limerick Shannon Metropolitan area transport strategy, which outlines proposals to improve cycling, rail and road infrastructure for citizens in the region over the next 20 years.

The strategy drawn up by the National Transport Authority in collaboration with local councils in Limerick and Clare was published in September and had as one of its main aims the improvement of infrastructure in the Limerick Shannon region for cyclists and walkers up to 2040.

However, it falls far short of those aims according to a cross-section of political, community, business and cycling groups in the city who have studied the plan, and submitted opinions on it.

Limerick cycling and pedestrian groups, as well as the Limerick Georgian society, have now penned an open letter to Transport Minister Eamon Ryan and to CEO of the NTA Anne Graham calling for a review of the draft document calling for it to be paused and redrafted.

The strategy has also been widely criticised by political parties across Limerick's metropolitan division, and by the city's Chamber of Commerce which represents 400 businesses across the region.

Councillors from Fianna Fáil, Fine Gael, Sinn Féin and Labour along with TD's from the Limerick City area have all described the plan as lacking vision and ambition for the city and that it's not aligned with either the Programme for Government or the Climate action plan over the coming decades.

The opposition to the plan has been outlined as the six week period inviting submissions on the strategy ends today.

In its letter, Limerick Cycling campaign, along with Limerick Cycling bus, the Limerick Pedestrian network and Limerick Georgian society says the strategy has five core deficiencies.

It has set no targets to be achieved, without which its success or failure cannot be measured.

It says public consultation on the strategy has been negligible, its uses out of date data, there is little accessibility planning in areas of social and economic isolation, and it is not climate action plan compliant in that there are no targets for reducing emissions.
In their letter to both Mr Ryan and the NTA the advocacy groups have called for the process to pause to allow for additional layers of stakeholder and public engagement to be added as the lack of consultation with the wider public is very disappointing.

Whole sectors and communities have been completely excluded from any involvement in this process, and the draft has shown itself to be out of touch with Limerick's needs, its people and its public representatives, the letter says.

A spokesperson for the National Transport Authority said the strategy is a draft rather than a final document and was published so the public could provide feedback, and the NTA will respond to that in the coming months.

But, it says, the strategy is aligned to national policy documents such as Project 2040, and the Climate Action Plan, and offers a framework for the delivery of an ambitious transport network for the region.