An Taisce
The National Trust for Ireland

20140203-DOT-CARBON

Low Carbon Road Map for Transport
Department of Transport, Tourism and Sport
44 Kildare Street
Dublin 2

lowcarbonroadmapfortransport@dttas.ie

07.02.14

Re: Consultation on the Low Carbon Roadmap for the Transport Sector

Sir/Madam,

An Taisce welcomes this consultation period on the Low Carbon Roadmap for the Transport Sector and the opportunity to make a submission with regard to same.

Please acknowledge receipt of this submission and advise us further of any forthcoming consultations in relation to the above report.

Yours sincerely,

Ian Lumley
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Consultation on the Low Carbon Roadmap for the Transport Sector



Tailors Hall, Back Lane, Dublin 8
www.antaisce.org

1.0 Issues for Ireland

1.1 National Emissions

EPA data records a 3.5% transport emission decline in 2012 on 2011, resulting from the 'Biofuels Obligation' and lower emission vehicles. However transport accounts for approx. 20% of national emissions and Ireland has one of the highest per capita emission levels in the EU.

The EU Effort Sharing Directive requires Ireland to meet binding emission reduction targets of 20% on 2005 levels by 2020 in the non Emissions Trading Sector, including transport. EPA projections establish that transport growth will result in significant overshoot of the 2020 target.

Much higher annual targets will be required post 2020. Future emissions agreements will also require major reduction in transboundary shipping and aviation - if the scale action required by climate science is to be achieved.

Department of Transport policy, *Smarter Travel: A Sustainable Transport Future – A New Transport Policy for Ireland 2009-2020*, adopted two key targets for 2020 from 2009 levels:

1. 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%, and
2. The total kilometres travelled by the car fleet in 2020 will not increase significantly from current levels.

'Key actions' including spatial planning, public transport and cycling investment and "institutional arrangements to deliver the targets" were set out.

The Department of Transport *National Cycling Promotion Framework 2009* provided that 10% of commuting trips be by bicycle by 2020.

The policy is being ignored and these targets are not being achieved:

- The National Roads Authority is funding schemes to generate more traffic into urban areas, e.g. the M7 lane additions at Newbridge / Naas;
- Local councils and An Bord Pleanála are continuing to permit car based development like the extension to the Kildare Retail Village and Kerry Group Campus on the N7. In counties such as Mayo and Roscommon, almost the only housing being granted is exacerbation of ribbon development;
- The National Transport Authority is ineffective in pursuing its statutory remit for sustainable transport, including using its prescribed consultee function on planning applications;
- The Department of Education in not properly integrating the funding of new and extended schools with Smarter Travel measures.

1.2 Biofuels and Electric Vehicle Use

Biofuel and electric vehicle use must factor full transboundary emission resource and land use impact. Displacement of food producing land and the real emission cycle puts the continued role of biofuels in question, whether produced within the EU or imported.

In average terms biofuels are now proven to cause more emissions than they save, not to mention spurring land clearances in lower income areas; please see the second and third notes set out in the annex below. The key point is that energy savings and efficiency must be accorded priority: these are not counterproductive, whereas a very high proportion of biofuel is.

Electric vehicles require full evaluation of the resource extraction impact of all material input from batteries and end of life redundancy. The use of private motorised vehicles needs to be reduced for reasons of curtailing congestion, obesity and inefficient land use as well as climate and resource consumption.

1.3 Transboundary Aviation and Shipping

Passenger travel between Ireland and Britain is predominantly by air with an unsustainable emission impact. This dependence is also vulnerable to any future major Icelandic volcanic eruption. Ferries are also of poor emission standard and lack timetabled connections to the British rail system, or link to the higher speed electrified parts of the network. The downsides of the rail-sail journey need to be addressed quickly.

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

2.0 International Actions for a Low Carbon Road Map

2.1 Take European and International Leadership in Negotiations

Ireland needs to take leadership in EU and International negotiations in reducing the emission and resource consumption of transport through:

- binding emission reduction targets, including aviation and shipping;
- enhanced emission efficiency for all transport vehicles;
- taxing of all transport fuel according to carbon impact including land use change and production impact, and
- linking all future trade agreements to carbon reduction.

2.2 Develop Low Carbon Ireland/Britain Connectivity

Initiate co-operative action between Irish and UK Governments as well as the Welsh Assembly for the development of the most emission efficient sail-rail services and electrification, with a particular focus on speed enhancement of the Holyhead to Crewe railway.

3.0 National Actions for Low Carbon Road Map

3.1 Legally Binding National Carbon Emission Targets

The heads of the *Climate Action and Low Carbon Development Bill* 2013 are based on advice to Government by the NESC Secretariat which is not based on science and fails to cost the real impact of climate emissions. A revised Climate Action Bill is required with legally binding targets for all sectors up to 2020 and annual reductions post 2020.

3.2 New Institutional and Implementation Structures

- Amend legal remit of NRA, NTA, CIE and Fáilte Ireland and other State Bodies to require enforcement of legally binding climate emission targets, with effective oversight role by Department of Transport and EPA;

- Integrate new national Spatial Strategy with provisions curtailing car based development whether employment location, residential, retail or leisure, with Ministerial Direction requiring compliance by Local Authorities and An Bord Pleanála;
- Amend Local Authority Development Plan parking to remove mandatory provision of specified levels of car parking places based on the square metre accommodation of different categories of development;
- Provide support structures for effective mobility strategies for major employment centres, schools and other locations and sporting and other events generating transport demand.

3.3 Direct all Future Transport Investment into Achieving Carbon Reduction and Smarter Travel Targets

All transport investment requires climate proofing. All investment options require cost benefit evaluation to maximise return in securing modal shift from car to public transport. Cycling and walking with reduction of car use for:

- access to urban centres;
- main employment locations;
- school travel routes;
- short journeys in both urban and rural areas;
- inter urban journeys, and
- tourism.

3.3.1 Bus Rapid Transit (BRT)

Give investment priority to BRT routes in urban areas where the greatest benefit in switching from car to public transport mode can be demonstrated.

3.3.2 Bus Purchase Procurement

Revise NTA procurement policy to maximise achievable emission efficiency standards for CIE and private sector fleet replacement. Future Dublin Bus and other urban bus procurement should be hybrid electric / electric with 30% fuel cost saving in parallel CO2 and NOX reduction of a similar order.

3.3.3 Rail Investment

Investigate feasibility of and appropriate phasing of electrification of main inter urban rail network.

3.3.4 Rail Freight

Embrace containerisation so that all new cargo flows can be carried in container compatible units. Re-develop strategy to capture higher share of agricultural related imports and exports.

3.3.5 Cycling Promotion and Infrastructure

Support bicycle schemes in main urban centres and Cycle Skills Training instructor standard with certification. Develop cycle skills school programme with focus on 12 -18 age group. Support bicycle ownership for those dependent on social protection payments.

3.4 Direct Carbon Taxation and Fiscal Policy Promoting Smarter Travel

Taxation and fiscal measures need to reward low carbon and emission travel and be tiered to taxing emissions according to real environmental impact.

3.5 Carbon Tax and Road Pricing

Apply an effective carbon tax to reflect the real environmental impact of carbon emissions with revenue used to fund sustainable transport. The impact of road tolling in encouraging circuitous toll evasion, e.g. from M3 to N2 via Slane needs to be assessed with alternative road pricing measures considered.

3.6 Vehicle Registration Tax

The scaling of VRT levels has had a significant impact in encouraging car purchasers to acquire lower emission vehicles. VRT levels should be progressively revised to encourage progressively lower emissions.

3.7 Civil Service "Mileage" Allowance and Business Vehicle and Travel Allowances

Current "civil service mileage" is three tiered, based on engine size. This subsidises higher-emission vehicles and provides no incentive for public transport or car sharing. A single car driver can get €300 for a return journey from Cork to Dublin for a vehicle with large engine size.

A uniform flat rated should be introduced with the reimbursement per kilometre based on the actual kilometre motoring cost for a lower emission car. Mileage payments should not be eligible for journeys where there is a public transport alternative. Similarly, car sharing should be promoted where a public transport route does not exist.

Review all tax measures and allowances for business car travel and parking space allocation to ensure that costs generated only by bona fide business or professional use (e.g. public health nurse) and not those commuting are eligible.

3.8 Tax Out-Of-Town Parking

Free urban fringe car parking is promoting unsustainable travel patterns and undermining the functional status and critical mass of urban centres in sustaining or developing public transport accessibility. Apply parking levy to all retail shopping location with over 50 car spaces at level of 45c per hour and 50c per hour for over 100 spaces (please see further An Taisce's Budget 2014 submission, attached).

3.9 Supporting the Cycle to Work Scheme

The 2009 tax relief scheme has had a significant impact on increasing levels of cycling. Addition provision is required to address replacement of stolen bicycles within eligible 5 year tax relief period (again, on this, and cycling measures generally, please see An Taisce's Budget 2014 submission).

Annexes:

- Link to An Taisce's 2014 Budget submission:
http://www.antaisce.ie/Portals/0/Documents/Downloads/2013-9-18_ATPre%20Budget%20Submission.pdf

- Link to Trocaire's document on biofuels:
http://www.trocaire.org/sites/trocaire/files/pdfs/policy/Biofuels-Fueling-Poverty.pdf

Graph showing biofuels with greater aggregate emissions than diesel / petrol
Source: Transport & Environment; please see further www.transportenvironment.org

