



Environmental Pillar
WORKING FOR A SUSTAINABLE FUTURE

Submission from the Environmental Pillar re
Consultation on

***Investing in our transport future -
A strategic framework for investment in land
transport***



16th October 2014

If you need to print this document please use recycled paper

1. Introduction

The Environmental Pillar an advocacy coalition of 28 national environmental NGOs, and a national Social Partner, welcomes the opportunity to comment on the draft framework document. However, given the very short time-line for comments on such an array of detailed documents, this submission only begins to highlight our concerns regarding investment in land transport. We would very much welcome the opportunity to meet with the appropriate officials in the Department at your earliest opportunity to discuss these further.

2. Climate Change

The Framework completely fails to address the challenge of transition to a low-carbon economy and thereby disregards Government policy.

It is not possible that the Department of Transport, Tourism and Sport is unaware of the Government's *National Policy Position on Climate Action and Low-Carbon Development*, adopted in April this year.¹

The *National Policy Position* requires

"an aggregate reduction in carbon dioxide (CO₂) emissions of at least 80% (compared to 1990 levels) by 2050 across the electricity generation, built environment and transport sectors"

However, we can find no reference to this Government policy in the consultation document nor in the Environmental Report. One would expect to find it in the list of relevant plans and policies on p.6 of the Environmental Report and in the explanation of the climate policy framework on p.34 for example. We find this omission quite extraordinary considering the implications of the reductions in greenhouse gases(GHG) required in the transport sector.

The most significant challenge the Department of Transport faces is the development of a low carbon sectoral roadmap consistent with Government policy. Reference to this has to wait until p.42 of the document:

"A co-ordinated, cross-governmental approach to reducing national emissions is under development, for which the Department of Transport, Tourism and Sport is preparing a low-carbon sectoral roadmap. The challenge for this framework is to prioritise investment that can contribute to national economic productivity while meeting Ireland's international obligations and emissions targets."

Somehow the Strategic Framework for investment in land transport is not written in the context of this low-carbon transition policy and the development of a sectoral roadmap, which makes no sense.

1

<http://www.environ.ie/en/Environment/Atmosphere/ClimateChange/NationalClimatePolicy/News/MainBody,37848.en.htm>

The Environmental Report also fails to reflect the Government's climate change policy position. Instead of following Government policy, the Environmental Report purports to develop its own Objectives for Climate and Air Quality (p.7):

“Objective 5 Contribute to mitigation of, and adaption to climate change and air quality issues.

“Objective 6 To ensure that the resilience of climate change is incorporated within the transport network.”

It then sets an “SEA target” as follows (p.85):

“No increases in transport related greenhouse gas emissions (GHGs) from plans and projects developed from the Framework relative to the existing levels reported annually by the EPA to the UN as required under the United Nations Framework Convention on Climate Change (UNFCCC).”

This target, envisaging maintained GHG emissions from the transport sector, is directly in conflict with Government policy to reduce fossil fuel and industrial emissions by 80% by 2050.

A Strategic Framework for Investment in Land Transport must be written in the context of the climate change challenge and National policy in relation to transition to a low-carbon economy. This document has not taken this transition as a starting point and therefore needs to be reworked from first principles.

3. Attack on rail

The document reflects a consistent bias against rail, reflected in the omission of relevant material, the making of unequal comparisons between rail and road, and failures to recognise the benefits rail brings.

Biased comparisons between rail and road investment and current expenditure

Consider this bullet point from page 10:

- “In view of the capital funding and operational subvention necessary to maintain and operate our rail network, together with the levels of revenue generated from the network, the current situation with regard to rail is not financially sustainable. The need to ensure value for money must be central to future rail policy.”

By contrast there has been no reference to value for money in relation to road expenditure, despite the well documented overcapacity on a number of Irish motorways and consequent ongoing extra burdens on the Exchequer.²

² <http://www.irishtimes.com/news/environment/gort-tuam-link-set-to-become-another-irish-ghost-motorway-1.1903132>

Compare the above bullet point with the reference to road transport in the following bullet point:

- “A strategic road network of national, regional, and strategically important local roads, vital to the functioning of our transport system and local economies, should also be defined and funding targeted there.”

Note there has been no reference to the vital role of a strategic rail network as the core of a strategic public transport network vital to the functioning of our transport system and local economies.

A reasoned analysis would consider the funding allocated to both rail and road, in the context of the external costs and social, environmental, and economic objectives, and comparing cost-effectiveness with other countries.

One message is repeated three times in the report:

(p. 26) “With regard to the existing heavy rail network, heavy rail mode share accounts for 1%–2% of passenger trip demand, 4%–5% of passenger kilometres and around 1% of freight tonne kilometres. The steady state requirement for this heavy rail network accounts for almost 20% of total steady state costs for the entire land transport network. Given the scale of this commitment relative to the level of demand, the steady state requirement for rail must be assessed on a value for money basis.

(p.29) “Our rail network accounts for a disproportionate amount of steady state funding, almost 20%, while catering for only 1%–2% of passenger trip demand, 4-5% of passenger kilometres and 1% of freight kilometres. It is recommended that a new rail policy is drawn up to address the future role of rail transport in Ireland, taking account of the low level of demand as well as the benefits of the markets it serves, in particular those travelling from wider, more dispersed areas to city centres.”

(p. 48) “Our rail network accounts for a disproportionate amount of steady state funding – almost 20% – compared to the level of demand it caters for: 1%–2% of passenger trip demand, 4%–5% of passenger kilometres and 1% of freight kilometres. It must be acknowledged that rail often provides social and economic benefits.”

Aside from repeating the same text three times, the analysis here is surprisingly specific, compared to the generalisations and qualitative rather than quantitative analysis which characterise the document as a whole.³

However, there is relevant information in the Environmental Report (*Table 3.1: Strategic Principles to Frame Land Transport Investment Priorities*, p.17) The table contains useful information on the Framework which is not in the document itself, which in itself is not ideal. It shows that the investment costs calculated for public transport include rolling stock/vehicles (trains, buses, trams)

³ These comments also appear to be in contradiction to the case made on p.48 for an increase in investment from €1.3billion to €1.8billion per year.

while the capital invested in private vehicles isn't included in the road investment costs.

If this is the case, the comparison between expenditure and passenger numbers/miles is ridiculous and it is astonishing that such a misleading comparison has been included in the report three times.

On page 27, this analysis leads to the following conclusion:

“There is therefore a need for a new rail policy. This should address key questions such as:

- What is the future envisaged role of rail transport in Ireland?
- What extent of the rail network is it appropriate to retain?

“The latter issue should include regard to the total level of transport funding likely to be available in the medium to longer term, the transport needs uniquely addressed by the rail network, now and in the future, and other wider policy considerations (including sustainable development).”

This is quite astonishing. Climate change, the big challenge of our age and certainly the biggest challenge facing the transport sector and the Department of Transport is relegated to somewhere under “sustainable development” which in turn is sidelined as one of “other wider policy considerations. Partly in consequence, of course, the question is not “what is the optimal rail infrastructure” but the leading question “what extent of the rail network is it appropriate to retain?”

Key Irish Rail report ignored

Remarkably this strategy document on investment in land transport fails to reference the Irish Rail report *2030 Rail Network Strategy Review*⁴ (although the Environmental Report mentions it). That report goes into some detail on outstanding rail investment requirements and opportunities including infrastructure elements such as the Dart Interconnector without which the desired modal shift referred to elsewhere in the document will be simply impossible.

Rail benefits missing

The discussion on transport and tourism (p.42) fails to even mention the role of rail in tourism.

The discussion of economic and local development benefits fails to refer to the willingness/unwillingness of investors to locate in areas without quality rail infrastructure and the impact which isolation from quality rail access to Dublin/Belfast has in some rural areas.

Rail's prospects with rising incomes misrepresented

On page 7 the report states:

“Unlike car ownership and use, public transport usage is generally adversely impacted by rising incomes”

⁴ <http://www.irishrail.ie/about-us/rail-vision-2030>

It goes on to discuss recent trends in some detail. However it fails to note that rail, especially long-distance rail, maintains or increases its attractiveness with rising incomes.⁵

No-one could have any confidence in a policy process which produces such slanted analysis.

4. Air Quality

Ireland's breaches of the National Emissions Ceilings Directive and anticipated breaches of the CAFE Directive are mentioned in the Environmental Report. However, the objective set in the Environmental Report doesn't actually make sense:

“No nitrogen oxides (NOx) or non-methane volatile organic compounds (NMVOCs) emission increases from plans and projects developed from the Framework relative to the limits reported annually to the European Commission under the National Emissions Ceiling Directive.”

It doesn't refer to PM_{2.5} at all, despite the anticipated breaches of the CAFE Directive in relation to PM_{2.5}.

In any event, the Framework has not been amended even to reflect the framework not to mind ensure we comply with EU law on air pollution and the Air Quality Directives aren't even mentioned in the discussion of international environmental and energy obligations in Annex 1 of the document.

5. Public Health

There is repeated reference to the importance of public health as a factor in transport policy:

p. 44 *“The role that a shift to active travel modes can play in furthering population health and tackling obesity and the opportunities for so doing afforded by shorter often urban trips are acknowledged.”*

p.51 *“The role that a shift to active travel modes can play in furthering population health and tackling obesity and the opportunities for so doing afforded by shorter often urban trips are acknowledged.”*

However this repeated acknowledgement pretty much sits on its own and appears to have no consequence in the approach set out in the Framework.

6. Infrastructure and Spatial Planning

⁵ <http://www.vtqi.org/tranben.pdf>
<http://www.networkrail.co.uk/asp/662.aspx>

The discussion in the document on infrastructure and spatial planning fails to engage with the role of transport infrastructure in determining urban form and in incentivising or disincentivising modal split. At certain points it reaches important conclusions, e.g. (p.10):

“For example, in the absence of any significant spatial constraints on residential development, reduced journey times provided for by the motorway network could tend to facilitate more dispersed population patterns than would have been the case without such infrastructure.”

This thinking needs to be taken to the next logical step. If infrastructure investments had facilitated reduced journey times by rail, the pressure on the planning system would have been to facilitate more clustered, rail-based developments. However, with a few exceptions, the necessary rail investment wasn't made. The clear lesson to be drawn is that further development must be linked to rail infrastructure.

Additionally, of course, road infrastructure must facilitate and not discourage walking and cycling. Unfortunately, most recent road development has created hostile and unwelcoming environments for walking and cycling. This issue should be addressed in the investment framework.

The discussion on p.36 about spatial planning seems to suggest there's a catch-22, when in fact the solution is straightforward – build pedestrian and cyclist-oriented settlements with good rail access.

7. Green Infrastructure

The document should recognise the importance of green infrastructure approaches to transport infrastructure and commit to a green infrastructure approach.⁶

8. Modal Shift

The document is generally light on analysis of the implications of recent policies and decisions. However it does contain this comment (p. 46):

“Transport policy has consistently had a stated aim of promoting modal shift away from the car. This policy direction has been based on attempting to limit urban congestion, the high cost of providing additional road capacity to deal with ever increasing demand and, in terms of accessing urban centres, recognising that road capacity increases are not always the best solution and are sometimes almost physically impossible. However, implementation of this mode shift policy has to date proved unsuccessful, as trends show an ever increasing dependency on car-based travel.

⁶ <http://www.nesc.ie/en/publications/publications/comhar/comhar-publications/comhar-reports/creating-green-infrastructure-for-ireland/>
<http://www.uep.ie/news/greencity.htm>

Unfortunately, it doesn't explore the reasons for this lack of success. One is exemplified only a few pages earlier (maps on pp.33/34 and the following text on p.38):

“Due to availability issues regarding models and data, the consideration of capacity issues focuses on roads.”

It is striking that though we claim to prioritise public transport, walking and cycling, we suffer from “availability issues regarding models and data”.

Another self-evident reason which should be explored in the document the relative total investment in the various modes over recent years, which was overwhelmingly focussed on road infrastructure for private cars.

9. SEA process

The Environmental Report fails to produce any qualitative analysis, however imprecise, of the impacts of the Framework on emissions. It fails to rely on existing legal obligations and national policy in relation to climate change and air quality. As such it doesn't meet the requirements of the SEA Directive.

Contact information:

For further details please contact Michael Ewing, Coordinator of The Environmental Pillar.

Postal Address: Environmental Pillar of Social Partnership. Knockvicar, Boyle, Co Roscommon

Telephone: 00353 (0)71 9667373

Mobile: 00353 (0)86 8672153

Email: michael@environmentalpillar.ie

This submission was developed using the Environmental Pillar processes but is not necessarily the policy of each member group in the pillar.

Environmental Pillar members: An Taisce. Bat Conservation Ireland, BirdWatch Ireland. CELT - Centre for Ecological Living and Training. Coast Watch. Coomhola Salmon Trust. Crann. ECO UNESCO. Feasta. Forest Friends. Friends of the Earth. Good Energies Alliance Ireland. Global Action Plan Ireland, Gluaiseacht. Hedge Laying Association of Ireland. Irish Doctors Environment Association. Irish Natural Forestry Foundation. Irish Peatland Conservation Council. Irish Seal Sanctuary. Irish Seed Saver Association. Irish Whale and Dolphin Group. Irish Wildlife Trust. The Native Woodland Trust. The Organic Centre. Sonairte. Sustainable Ireland Cooperative. VOICE. Zero Waste Alliance Ireland