

Comhar Sustainable Development Council
Response to Public Consultation
on Sustainable Travel and Transport
Executive Summary

May 2008





Foreword

Transport is one of the seven “key challenges” identified in the revised EU Sustainable Development Strategy published in June 2006. In Ireland, the transport sector has grown much faster than the economy as a whole and this growth has been accompanied by increasing problems like congestion, local air pollution, greenhouse gas emissions and the effects of urban sprawl. Comhar Sustainable Development Council (SDC) therefore welcomes the recently published public consultation document on the Sustainable Travel and Transport Action Plan (STTAP) by the Department of Transport. As Minister Dempsey stated in his launch of the public consultation, without policy intervention problems related to the transport sector will continue to grow. Transport policy offers the opportunity to address a range of societal problems in tandem through a more integrated policy approach. The realisation of a sustainable transport system could have a greatly beneficial impact on the economy through reduced pollution, reduced waste of time, and an increase in quality of life.

The STTAP could propose a positive definition of sustainable transport around a set of six goals based on environmental, social and economic constraints:

- i) Improved integration of transport with infrastructure, land use and demographic planning.
- ii) Reduced environmental emissions (CO₂, NO_x, VOCs, PM, noise)
- iii) Reduced transport congestion and accidents
- iv) Increased share of less harmful modes of transport
- v) Increased accessibility to transport
- vi) Support economic activities in the most efficient manner.

Sustainable transport should be the overall goal of the Department of Transport. It should not be a sub-sectoral objective to be considered on an equal basis along with other priorities, but rather inform all activities of the Department.

Our recommendations to the Minister for Transport on the STTAP are inspired by our philosophy that evidence to support policy proposals is important, that fairness – protecting the interests of the most vulnerable – should be at the heart of whatever is adopted, and that the views of interested parties should be taken seriously. To give a reality to this philosophy, we hosted a series of seminars during 2007 and early 2008 on themes related to sustainable travel and transport policy such as cycling, rural transport policy, transport demand management, and freight transport policy. Expert speakers from Ireland and abroad have given presentations with the latest information to audiences made up of people from a variety of backgrounds with a strong interest in the subject of sustainable transport. These presentations and ensuing discussions have helped inform the Comhar SDC’s recommendations to the Minister on the STTAP.

Comhar SDC was established in 1999 as the forum for national consultation and dialogue on all issues relating to sustainable development. The Council has 25 members drawn from five pillars: the State sector, the economic sector, environmental NGOs, social/ community NGOs, and the professional/ academic sector. Comhar SDC is supported by a full-time executive and secretariat based at St. Andrew St, Dublin 2. More information is available at www.comharsdc.ie.

Summary Recommendations

The big problems with transport in Ireland are rising pollution – greenhouse gas and air pollutants – and rising congestion on roads that makes journey times ever longer, wastes time, generates stress, diminishes family and community life, fosters obesity, and adds to pollution and costs at many levels. The key to making transport in Ireland more sustainable is to provide direct incentives to both [private] motorists and truck drivers to reduce their use of fuel and associated carbon dioxide, smoke (particulates) and other pollutants, and their use of scarce road space at peak travel times, and to improve the availability of alternatives and make them more attractive. Where incentives take the form of increased taxes or levies, the revenues should in effect be given back to those who paid them to support investment and behaviour that encourages conservation of energy and road space, and that protects the most vulnerable¹.

Transport impacts can be reduced with the good design of transport policies and in many cases will require political leadership and the ability to draw together many different areas of policy. The Department of Transport has a key role to play in implementing transport policy measures directly and indirectly by putting the institutional arrangements in place to lead collaboration with other departments and agencies on transport policy. A combination of a change in people's behaviour, technological solutions, and some government intervention in the form of planning and infrastructure provision is needed to achieve the above. Priorities for sustainable transport policy can be focused on the five I's:

- Incentives;
- Integration with planning;
- Infrastructure;
- Institutional arrangements;
- Information;

The first two of these – Incentives and Integration with planning – are key to sustainable transport yet not wholly within the remit of the Department of Transport. However, transport incentives and fiscal measures are urgently needed to deliver behavioural change and also to provide a source of revenue for investments in transport services and infrastructure currently lacking. Better institutional arrangements are needed to ensure that policies can be implemented effectively and at least cost, while information helps us measure our performance and informs us of the consequences of our actions.

The questions posed by the STTAP public consultation document are listed in Appendix I of the full report and answers are cross-referenced to the main text.

1 See Comhar SDC recommendations to Budget 2008 on the carbon levy and revenue use. Available at http://www.comharsdc.ie/_files/Exec%20Summary%20ComharRecs_budget08_FINAL.doc.

1) Fiscal Measures and Incentives

Fiscal measures and good information promoting sustainable transport are crucial as the backbone to all other transport policy measures. If we price transport in a way that provides incentives to people to make sustainable choices and give them the information to realise this, then they will do so. In all cases good design of transport fiscal measures is needed to maximise behavioural change and minimise the impact on the economy and vulnerable members of society. Fiscal measures should be aligned with the near completion of investment projects in transport infrastructure such as Transport 21.

The chief recommendation is the implementation of a **national road pricing scheme**. A national scheme of road user charges can internalise all externalities associated with transport in a fair manner and has the advantage that congestion is addressed as well as environmental damage. Compared with the option to introduce congestion charges in major urban areas only, the full roll-out of a national road pricing scheme has a similar technological requirement and is the logical extension of such an instrument, with the advantage that all transport emissions are covered².

Under such a scheme, all transport fixed charges such as vehicle taxes should be removed and converted to distance-based road charges which should vary according to vehicle emissions, geographical location, and time-of day. This will encourage consumers to purchase more fuel-efficient, clean vehicles and to drive less, and it will furthermore ensure that when they do take to the road, they can move smoothly, safely and efficiently. The design of the scheme should be made as simple as possible and stakeholder buy-in is crucial at the design stage of the scheme to reduce resistance to its implementation. In recent years the technology required to operate national road pricing has become more accessible and should be widely available within five years. The revenue collected through such a scheme should be sufficient to offset the revenue shortfall from vehicle taxes. It should be earmarked for transport infrastructure investment and to alleviate any distributional impacts thus making road pricing more acceptable to the public and providing a real choice of travel options.

The Netherlands has recently passed legislation approving the phased introduction of a national road pricing scheme with popular support. The Dutch experience in developing such a scheme shows the necessity for a lengthy preparatory period to study the most suitable scheme design, raise public awareness and obtain the stakeholder buy-in that is needed for legislative approval of a national road pricing scheme.

We need to begin similar preparatory work in Ireland as there will be significant lead-in time for the implementation of such a scheme. A feasibility study of a national road pricing scheme should be commenced immediately to investigate the potential

2 Especially considering that rural travel accounts for 86 percent of vehicle-kilometres driven annually (McDonagh 2006).

strengths and weaknesses of such a scheme as applied in Ireland. A full roll-out of this measure should be timed to begin with the near completion of the Transport 21 measures in 2013/2014; this will help ensure that alternative modes of transport are in place.

In the absence of a national road pricing scheme, several other fiscal measures should be considered such as a carbon levy, a cap-and-share scheme, fuel excise duty escalator and local fiscal charges such as congestion charging or intelligent parking pricing. More details of these are in the main document. 1ES summarises the potential timing of the introduction of transport fiscal measures.

1ES: Potential timeline for national transport fiscal measures

| 2008 | 2009 | 2010 | 2011 | 2012 | 2013 | 2014 | 2015 |
|------|--|------------------------------|--------------------------------|------|-----------------------------------|------|------|
| | Fuel price escalator + CO ₂ vehicle taxes | | | | | | |
| | | Carbon levy or cap-and-share | | | | | |
| | Preparation work on road user pricing | | Scheme design and announcement | | National road user pricing | | |

2) Institutional Arrangements

Improving the sustainability of transport will require the cooperation of many government departments and agencies, economic sectors and individuals. The Department of Transport should lead in coordinating transport policy in Ireland. Institutional arrangements are needed that deliver policy on time and within budget.

- a) **Collaboration** of government departments, agencies, and local authorities is needed in land use, transport, pricing, environment, climate change policy – perhaps a national transport authority is needed?
- b) For major urban areas, **independent transport authorities** are needed with financial and human resources to provide creative urban transport strategies and the power to implement them.
- c) The **reform of the 1932 Road Transport Act** is urgently needed to address legal issues regarding the provision of new transport services. Creative ideas are needed to improve transport services in Ireland and the legislation should facilitate this.
- d) Agencies **should be mobilised** and integrated under the jurisdiction of the Department of Transport to provide information and develop and implement sustainable transport strategies.

3) Transport Infrastructure

Passenger and freight transport alternatives to road transport need to be provided in order to provide citizens with real choices when facing fiscal charges. Revenues from transport fiscal measures should be hypothecated to fund infrastructure and other measures promoting sustainable transport. This involves the provision of **transport infrastructure** and supports such as integrated ticketing, real-time information, logistical expertise, freight centres etc.

- a) **Multicriteria analysis** (MCA) should be used to prioritise infrastructure investment in a transparent manner. Priority should be given to investment in transport infrastructure that is environmentally effective, cost efficient and that takes long term demographics into account.
- b) In the Greater Dublin Area (GDA), **lower cost investment options** such as improved bus services and pedestrian and cycling facilities should be implemented ahead of higher cost alternatives.
- c) Increased modal share of **cycling and pedestrian** commuting will require significantly more investment and institutional support than is currently available. Investment is needed in much safer cycle infrastructure separated from traffic to reduce the perceived danger associated with cycling.
- d) **Bus and rail services** should provide services driven by demand and social policy. CIE should review timetabling and service provision to assess whether demand for services is met. There are cases where timetabling has not changed in twenty years and does not reflect new residential and commercial growth in some areas of the country. In areas where the demand is low in numbers but socially important, then services should be adjusted accordingly and may require subsidy if it is judged necessary.³
- e) **Prioritisation of walking, cycling and public transport, especially in city centres**, is needed to encourage non-car means of transport. For example, pedestrianisation of an area between St. Stephen's Green and O'Connell St in Dublin would be a significant first step to improving the quality of life in the city centre.
- f) It is necessary to make **public transport attractive**. Integrated ticketing has been discussed for the GDA since the mid 1980s; it should be implemented as soon as possible, i.e. immediately. Real-time information on bus routes would also improve the reliability and attractiveness of bus services.
- g) Review is needed of the amount and design of **motorways** planned. In particular, optimisation of the use of existing motorways should be prioritised over building new motorways.

3 There is more on this issue in the section on rural transport.

- h) Serious consideration must be given to improving the sustainability of Irish **freight transport**. A **national distribution centre** outside Dublin is required for freight transport to improve the logistics of small freight operators in particular and to enable the efficient use of existing infrastructure. Most freight transport in Ireland has its origin and destination within Ireland⁴ and better coordination of freight transport services is needed.
- i) Give serious consideration to moving the location of:
 - Dublin **port** to a more accessible location, which will not require freight to be trucked round Dublin city centre on the M50. Operation of the container depots should be changed to facilitate night-time deliveries;
 - The **oil depot** and installing an oil pipeline from Dublin port to the north of Dublin.
- j) There are clear social benefits associated with **rail freight** in comparison with road freight. The development of rail freight in appropriate areas should be financially supported with public money (from transport fiscal measures) if the benefits outweigh the costs from a societal perspective. While it is expected that road will continue to be the dominant mode of freight transport, innovative solutions using existing infrastructure such as Luas lines at night for freight are possible options that should be given consideration to maximise the use of existing resources.
- k) An assessment of the potential of **plug-in electric vehicles** to reduce Irish transport greenhouse emissions and of the implications for related infrastructure should be carried out.
- l) **Biofuels** subsidies should be awarded based on the amount of CO₂ emissions reduced per litre of fuel rather than volume targets. Sustainability criteria should be adopted and used as a minimum standard for biofuels supplied to the market.

4. Information

With infrastructure and fiscal measures designed to promote sustainable transport in place, **good information** is key to make people aware of the choices they face. The provision of good information can have a significant impact in reducing individual consumption and is a low cost policy measure.

Information on transport performance generally, and in regard to sustainability dimensions in particular, is widely dispersed between sources such as CSO, DTO and NCT, NRA, RPA, SEI, Road Safety Authority, CIE Group, and there are important gaps. The relevant information should be supplied on time, to the requisite quality. Without good information people may not know all the transport options available to them or understand fully the consequences of their actions. Our main recommendations on the provision of information are the following:

- a) **Ecodriving** training for private and commercial drivers should be obligatory at the time of first licensing.

4 CSO (2007) Road Freight Transport Survey 2006.

- b) All firms with a large number of employees should be obliged to provide **workplace travel plans**. There should be a central service in each city providing support to firms and people not working for firms with a travel information centre.
- c) **Real-time information** should be rolled out for all modes of public transport.
- d) Consistent, simple **environmental labelling** should be provided on all new vehicles sold.
- e) **Transport data collection and modelling** are required to inform evidence-based policy-making in the transport sector. We recommend that a central facility for transport data and modelling be established.
- f) More **transport research** is needed. In particular work on estimating marginal abatement cost curves and elasticities for Ireland for the sector are needed urgently.

5. Integrated Land Use and Planning with Transport

- a) **Land use and planning** must be aligned with the **National Spatial Strategy** and be **integrated** into transport decision-making and vice-versa.
- b) Land use planning has a longer term impact on the sustainability of transport.
- c) Poor planning without heed to transport requirements has created much of the residential sprawl throughout Ireland and led to car dependency. More formal legislative requirements are needed to ensure good planning and transport integration.

6. Special Case: Rural Transport Policy

Rural transport has been neglected and many geographical areas have very little regular conventional transport services. This makes it difficult for rural dwellers to travel without using a car.

- a) Comhar SDC recommends that revenues from transport fiscal measures be used to:
 - Improve rural transport services for “conventional” trips, i.e. work or school-related transport,
 - Increase funding for the Rural Transport Programme to enable full geographical coverage of the scheme.
- b) Coordination of services in rural areas by different government and non-government agencies is needed so that mobility and accessibility objectives are aligned. For example, the closure of local services should be avoided to reduce the need for increased mobility to larger urban conurbations.
- c) A National rural transport policy strategy is needed to draw together existing schemes and transport services and provide a vision for an ambitious future for transport in rural areas.





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