Sustainable Mobility Policy Review,
Department of Transport, Tourism and Sport,
Leeson Lane,
Dublin 2,
D02 TR60.

22 January 2020

Re: Submission on Sustainable Mobility Policy Review – Climate Change Challenge

To Whom It Concerns,

Cork Chamber is the leading business organisation in Cork, proactively working to identify and progress developments that are facilitative of economic and sustainable growth. Representing an employer base of close to 1,200 businesses and over 100,000 employees across the region, Cork Chamber is the largest business representation organisation in the South of Ireland.

The UN Intergovernmental Panel on Climate Change (IPCC) in 2018 reported the imperative that action is needed now, and fast, to cut the risk of extreme heat, droughts, floods and poverty. The IPCC Special Report outlined the impacts of global warming of 1.5°C above pre-industrial levels. Beyond 1.5°C by even a half degree, we are significantly increasing our vulnerability to increasing our risks of drought, floods, extreme heat and poverty for millions of people. Compounding this, the UN's Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) in May reported that one million species are currently threatened with extinction, representing serious implications across all human activities and health.

It is imperative to all activity, including economic activities and future growth, that behaviours and policies are changed. We need supportive policies and opportunities for the business community and all communities to make the transition to a low carbon society nationwide. In representing the voice of business, we highlight the criticality of 'certainty' for business to facilitate future planning decisions and investment. In a time of increasing geopolitical change and associated trade uncertainty especially in the context of Brexit, more than ever business needs certainty.

Reductions must be made to the largest energy-using sector emitting nearly 20% of total emissions and is the most reliant on imported fossil fuel. If we are to meet new energy demands, measures such as retrofitting homes, investing in the grid, generating renewable

energy will be essential for Ireland's sustainable future. It is imperative that government acts swiftly to enact the policy frameworks and supports, removing barriers to this transition.

Currently Ireland is consistently missing national and international carbon emission reduction targets with greenhouse gas emissions nearly three million tonnes outside the pathway identified to meet 2020 targets. From a purely economic perspective, the cost of inaction is far off balance with the benefits of action considering the financial penalties payable of up to €150 million per annum. Ireland is clearly missing out on opportunities to shift to a clean energy and tech society and the benefits that this could bring to our wider economy, society and environment. Conversely, failure to meaningfully act could also damage Irelands reputation and appeal as a place to invest and do business.

This submission has been guided by Cork Chamber commitment to delivery of the Cork Metropolitan Area Transport Strategy and the commitment of Cork Chamber to the UN Sustainable Development Goals. Five specific goals have been identified by the Irish Chamber Network which we are actively advocating for throughout our work;

Following the avoid, shift or improve approach, herein Cork Chamber assess the options and opportunities for Ireland to make this transition, taking action on climate at an accelerated pace to match the urgency of the climate crisis and climate science.

1. **Avoid - Emissions in the transport sector**

There is an opportunity to adopt technologies within our transport fleet to greatly enhance and safeguard air quality. In the case of Cork, with over 20% of the Cork Metropolitan area yet to be developed by 2040, now is the opportunity to have a step change in public transport technology and fuel. The future will require a mixture of technologies and fuel types, in Cork Chamber we firmly believe that immediate and ambitious action must be taken to meaningfully cut emissions now. In a recent 2019 study carried out by Cork City Council and the Centre for Research into Atmospheric Chemistry at UCC, air quality in Cork city is currently one of the worst in Europe recorded by real-time air quality monitoring website PurpleAir, with sensors measuring the level of particulate matter in the air. The Environmental Protection Agency

confirmed that data from one of its air quality monitoring stations in the city rated the air quality as “poor” at approximately the same date and time, further verifying the PurpleAir findings.

Cork Chamber advocate for the immediate adoption of a biomethane public bus fleet for Cork. Biomethane is a low-carbon, methane-based transport fuel produced from anaerobic digestion giving effect to national waste policy, driving towards an efficient circular economy in converting waste to energy, while increasing domestic energy security, diversity and resilience. Biomethane as a fuel is particularly suitable to heavy vehicles such as buses and HGVs. Reducing greenhouse gas emissions by up to 85% while having particulate matter-free combustion, dramatically reduced NOx (nitrogen oxides) emissions and few ozone promoters than Euro V diesel vehicles, biomethane represents a significant opportunity for utilisation as a transport fuel. Across Europe and further afield, this technology is commonplace. In Nottingham alone, the double-decker bus fleet is powered entirely by biomethane. Nottingham City’s transport fleet of 53 bio-gas double deck buses has doubled in size in 2019 with the addition of a further 67 buses. Finally, the capital cost differential between diesel and biomethane bus vehicles is minimal, with hybrid electric costing 50% more than a diesel bus.

Government must support the development of a market structure to support anaerobic digestion, through regulatory and infrastructure support and subsidy support at the outset. There is significant potential for a market in biomethane to become self-sustainable overtime offering a diversified revenue source within the agricultural sector while supporting a net zero emissions fuel. While the efforts of Gas Networks Ireland to increase the ratio of fully renewable biomethane in the national gas grid, and the efforts of Eirgird to decarbonise electricity sources through the development of the interconnector to mainland Europe must be supported in our national efforts to cut emissions.

There is already strong Government support for electric with this technology identified and currently being supported as a preferred option for transport. We highlight the need to accelerate the fully renewable generation of electricity to ensure the source is green and clean, and to this we emphasise the urgent need to unlock grid connections and subsidies for the promotion of a thriving renewable energy sector across solar and wind. We caution against any singularity in focusing strictly on one technology and encourage the merits of a diversity of fuel sources/ technology to reinforce fuel security and resilience. Cork Chamber questions the ambition of adopting electric hybrid technology as an interim solution by the NTA. While electric hybrids are dependable, this technology still runs on diesel. The net gains as regards GHG emissions reductions and air quality do not stack up especially when used in a busy urban environment which requires a high proportion of stop/ start driving behaviour. We believe there is an urgent need to be more ambitious.

In 2018/2019 the Department of Transport, Tourism and Sport conducted trials of low-emission bus technologies in Cork and Dublin. Within the summary[1] results from these trials it was concluded that hybrid-electric buses run on biodiesel and gas buses run on bio-CNG offer the greatest potential contribution towards Ireland’s renewable energy transport targets to 2030. Cork Chamber continue to actively support the Energy Cork proposal for Ireland’s Greenest Bus Fleet[2] which advocates for the conversion of the Cork public bus fleet to

[1] https://assets.gov.ie/34685/0eadd0e2d4704fddb32c42e7d939c7ef.pdf
[2] http://www.energycork.ie/index.php/portfolio/irelands-greenest-bus-fleet/

biomethane (biogas). This proposal is widely supported and identifies the opportunity for Cork as a location of scale, with a fleet size of 120 buses and with one central refuelling station for the public bus fleet in Cork City at Capwell (which has already undergone significant groundworks for CNG/biogas refuelling capability) to transition to low emission technology. There is an opportunity now to transition to low emission fuel and technology cutting our GHG emissions while utilising a low emission public bus fleet as an exemplar for broader behavioural change.

Realistically there will need to be a mix of fuels and technologies adopted in the future. There are still persistent issues with reliability with fully electric buses, with no viable double decker option available currently. The future holds great opportunity also for Hydrogen which is very promising and should be a game changing technology in the future. While we are not there yet, we do have an opportunity now to meaningfully adopt a dependable technology which will give a significant reduction in harmful climate emissions and particulate matter.

2. Shift - Air quality and public transport fleet technologies

The rollout of the transportation strategy is an opportunity to be ambitious and support the development of Living Cities, and vibrant regional towns and urban areas. For example, Cork has the scale to progress and be the dynamic embodiment of what a Living City can look like in an Irish context. A key component of developing a thriving and sustainable City is the provision of green spaces, planting, and the safeguarding of the environment and air quality for citizens. Here we have an opportunity to adopt technologies within our transport fleet that will greatly enhance and safeguard air quality as the city grows and develops. With over 20% of the Cork Metropolitan area yet to be developed and projected for by 2040, now is the opportunity to have this step change.

As stated previously we have opportunities to avoid GHG emissions through the adoption of clean technologies. In the case of biomethane for transport, Cork Chamber believe a subsidy to support biomethane production is a feasible option in national efforts to decarbonise the national grid. There is already commonplace in Europe and a staple of economic activity in Northern Ireland. Indeed, many Irish producers transport biomethane produced in ROI to Northern Ireland to avail of the market model and price point. Developing a subsidy structure in Ireland would be hugely beneficial to aid efforts to decarbonise our economy.

Without a doubt, the future holds great opportunity also for Hydrogen which is very promising and should be a game changing technology in the future. While we are not there yet, we do have an opportunity to support Research Development and Innovation (RDI) in the development of hydrogen-based technology across a spectrum of uses for example transport and heating.

Cork Chamber encourage the adoption of a diverse fuel mix encouraging diversity, security and resilience of our fuel mix to 2050 and beyond. While not in a position to prescribe a specific mix, we are adamant that the most prudent approach is via the encouraging of support for a diversity of technologies and fuels to effectively pave the way for a successful transition to 2030, to 2050 and beyond. In the immediate term, we need to embrace our national potential to generate energy with net-zero carbon emissions.

Modal Shift and Behavioural Change - Transport should be accessible and affordable to all. The most appropriate transport network will be determined by the land use planning, geography and density of a location, varying on whether urban and rural and on the scale of the location. We take this opportunity to emphasise the principal requirement for the provision of a smart, integrated, accessible, affordable and clean technology public bus service network and infrastructure at local, regional, and national level.

For an **urban environment**, it is crucial that a connected and integrated transport network is supported and invested in. The network must incorporate a variety of transport modes to include bus, commuter rail, light rail (where appropriate), cycle infrastructure, water transport, GoCar and pedestrian friendly pavements and associated infrastructure i.e. pelican crossings.

For a **rural environment**, we commend the NTA support for LocalLink and encourage that support continues to be enhanced for this service. In a rural setting, it is far more limited as regards the availability and access to public transport services. However, it is essential that rural routes and the continued provision of access to public transport is not solely focused on profitability. Dependent on geography, bus is the most likely and appropriate form of transport for rural areas. Supporting car share scheme e.g. GoCar for urban and rural areas, making this option more affordable to take account of longer travel distances could be beneficial. Finally, greenway cycle routes connecting rural towns have a strong potential to encourage active travel for commuters as well as for leisure. Along with GHG reductions, the continued support for cycle networks routes in rural and urban locations are a gamechanger in facilitating active and safe travel.

In conclusion, Ireland needs a public transport network that is cohesive, with consistent and uniform ticketing and payment structures across services and service providers, and with easily accessible and understandable transport network information. It is essential that the service is affordable and reliable. We need greater integration of smart technologies with the opportunity of real time information panels to drive greater usage. We need immediate investment in cleaner public bus fleet technologies and fuels to meet our local and national environment commitments, emission reduction targets and due diligence. We need greater and more rapid investment in critical network infrastructure such as bus corridors, bus shelter infrastructure, interchange facilities, and mobile information apps. For example, where we do have real time information panels in Cork City, the information displayed is not reliable and represents an enormous opportunity lost for the service and customer. It is essential that national investment is focused on developing the public bus service infrastructure in a way that engenders confidence in the service and increases the reliability on the service. These are the essentials in driving a modal shift for commuters. The commuters and the employing businesses require this level of confidence and service reliability.

3. Improve - Infrastructure Investment

Public and sustainable transport networks and infrastructure are fundamental building blocks to successfully decarbonise by 2050. Currently Ireland is drastically lagging behind our European counterparts in terms of availability of public transport options and sustainable (cycle) network options for commuters. In Cork City alone, census 2016 highlighted a startling rate of car dependency in Cork City with 70% of commuters choosing private car transport. This contrasts dramatically with what can be achieved when a dependable public transport option is brought online, as has happened with the introduction of high-frequency (every 15

minutes at peak times) of the Ballincollig to Cork City Bus Eireann service which has seen an increase of 70% in passenger numbers since its introduction in 2019, resoundingly proving the appetite amongst commuters to opt for public and sustainable options. Our transport networks and infrastructure are not fit for purpose having been chronically underinvested in recent decades. This requires urgent investment. We are at a pivotal point in Cork alone with development at a larger scale than ever seen before, now is the opportunity to be laying the foundations for a public and sustainable transport network that works for commuters, and that encourages commuters behaviours and patterns that do not detrimentally add to GHG emissions. Bus Connects must get underway immediately to deliver bus corridors and park and rides for Cork. We are now two years into a 10-year National Development Plan without a kilometre of additional bus lane nor a planning application for a single park and ride. In Cork, we have not added cycle infrastructure of note since the depths of the last economic cycle.

Investment in public and sustainable transport infrastructure, technology and network is crucial and cannot be emphasised enough. Investment should be proactive and should be facilitative linking development with appropriate infrastructure and services. For example, focusing on delivery of infrastructure and services to the key employment hubs across Metropolitan Cork has significant potential to result in a step change in public and sustainable transport usage for a large proportion of our commuting population.

It is important to note the improvement in car technology and fuels in recent years, through innovation in biofuels, renewable fuels and the growth in reliability of electric car technology and range. The innovations across the automotive industry will continue to advance, with technology improvements positively affecting upon air quality and national efforts to achieve reductions in harmful GHG emissions. However, cars take up space, and lead to congestion. We believe the immediate opportunity for Cork lies within public and sustainable transport.

The delivery of transport infrastructure is a core priority of Cork Chamber members. In many respects, alongside the provision of accommodation, public and sustainable transport will be the defining enabler of the future prosperity and quality of life for the people of Cork. In equal measure, failure to deliver will be an acute inhibitor of progress.

Land Use Planning - Focusing on delivery of infrastructure and services to the key employment hubs has significant potential to result in a step change in public and sustainable transport usage for a large proportion of our commuting population.

Currently, Little Island and Ringaskiddy are major employment zones in the South of Ireland but have minimal to no public or sustainable transport investment and funding allocated. This is in no way conducive to a shift in commuting behaviours, and the reduction of harmful emissions, and presents quick wins for policy and investment. Other major employment areas such as Cork City centre and Blackpool provide ideal opportunities for quick wins.

Other comments

Cork Chamber highlights the innovative nature and the strong entrepreneurial composition of Ireland's business community. Support for innovation and new thinking will be key to accelerating a GHG emission reductions. The encouragement of innovation will be essential

in adopting a flexible, agile and proactive response and to pre-empt economic and to negate any potentially negative societal impacts.

The focus on implementation, monitoring and evaluation is an essential element of this and needs to reflect the urgency and responsiveness required. As this will be the framework for implementing and driving forward actions, the establishment of key performance indicators are essential, as is the commitment to ongoing review and updating as conditions change.

Finally, Cork Chamber emphasises the value of public consultations and welcome future opportunities to engage on this and associated topics.

Yours Sincerely,

Michelle O'Sullivan
Senior Public Affairs Executive,
Cork Chamber