

## Carlos Dunne

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**From:** Carlos Dunne  
**Sent:** Tuesday 17 October 2023 15:00  
**To:** Minister of State Chambers Office  
**Subject:** RE: Ref: DTTAS-MOSC-01285-2023

Good afternoon Patrick,

Many thanks for your email of October 10<sup>th</sup> last.

There is a lot of information and detail in there and I will review and come back to you if I may. We can then hopefully engage some more on the best means of ensuring the private bus and coach operator is at the forefront of the future of sustainable transport in Ireland.

Regards,  
Carlos

Carlos Dunne,  
Director  
Federation of Transport Operators  
045 878500  
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**From:** Minister of State Chambers Office [mailto:MOSC-Transport@corr.cloud.gov.ie]  
**Sent:** Tuesday 10 October 2023 15:51  
**To:** Carlos Dunne <cdunne@jfd.ie>  
**Subject:** Ref: DTTAS-MOSC-01285-2023

Our Ref: DTTAS-MOSC-01285-2023

Dear Mr. Dunne,

On behalf of the Minister of State, Jack Chambers TD, I refer to your correspondence of 28 July on behalf of the Federation of Transport Operators (FOTO) to Minister Chambers and Ken Spratt, Secretary General at the Department of Transport, regarding the transport sector's carbon emission reduction targets and other matters. Thank you for your suggestions which have been shared with relevant officials in the Department for detailed consideration.

In the first instance, the participation of bus and passenger transport operator in this transition will be crucial in the transition to zero-emissions transport and your organisation's willingness to assist in any research for proposals to reduce the transport operator emissions is noted and appreciated.

The level and scale of the challenge faced in the transport sector to comply with our sectoral carbon budgets and achieve a 50% reduction in emissions by 2030 is unprecedented. Travelling in a more sustainable manner and managing increased levels of travel demand will therefore be essential in order to achieve the 50% reduction target for 2030. The transport system must be decoupled from its reliance on fossil-fuels in order to accelerate the pace and scale of climate action in transport in this decade.

The Transport Chapter of the national Climate Action Plan 2023 brought a real, new focus on the need for systemic action, at all levels of Government, in order to better integrate our planning and transport systems so that we can achieve the 50% emissions abatement target for the sector. The

updated transport decarbonisation pathway has been informed by two core analyses of the Irish transport system undertaken in 2022:

1. the OECD's Redesigning Ireland's Transport for Net Zero review, undertaken at the request of the Climate Change Advisory Council (which found that our past and current transport systems have fostered growing car use and emissions by design); and
2. refreshed transport decarbonisation pathway modelling, undertaken by the National Transport Authority's modelling team and the Department of Transport.

The key performance indicators and targets outlined in the CAP23 Transport chapter are intended to illustrate the level of change required by 2030, including:

1. Reducing total vehicle kilometres travelled by 20% relative to a projected 2030 business-as-usual;
2. Achieving a 50% reduction in fossil-fuel usage in transport;
3. Accelerating our vehicle fleet transition so that approx. 1 in 3 private cars is a battery electric vehicle by 2030, with 100% of new sales being EV from that year;
4. Ensuring that walking, cycling and public transport account for 50% of daily journeys, which will require: a 50% increase in daily active travel journeys, a 130% increase in daily public transport journeys; and a 25% reduction in daily car journeys.

The Climate Action Plan and actions therein are subject to annual review by Government, and the Department of Transport is committed to engaging with all key stakeholders through consultative process in relation to key transport policies, such as recent consultations on our EV Charging Infrastructure Strategy, Renewable Fuels for Transport Policy, the Road Haulage Strategy and the National Sustainable Mobility Policy, as well as through advancing innovative demonstrator projects under our Pathfinder Programme and through wider public and industry participation enabled by the National Dialogues on Climate Action and National Climate Stakeholder Forum.

The Department recognises that the provision of park and ride facilities at strategic locations can help reduce the distances travelled by car, with a corresponding reduction in carbon emissions and congestion. The National Transport Authority (NTA) is leading the development and rollout of strategic park and ride sites nationwide through the Park and Ride Development Office (PRDO), which was established in February 2020 on foot of an action in the Climate Action Plan 2019. The function of the PRDO is to enable the delivery of park and ride sites by the NTA, in collaboration with local authorities and transport operators, across the country. Through the PRDO, full-time specialist resources are now employed on such projects.

The plans to expand the park and ride network are set out in the various metropolitan area transport strategies which have been prepared by NTA, which include input on park and ride from the PRDO. Three strategies have been published since the establishment of the PRDO, namely the Greater Dublin Area Transport Strategy 2022-2042, the Limerick Shannon Metropolitan Area Transport Strategy (LSMATS) and the Waterford Metropolitan Area Transport Strategy (WMATS). The PRDO is also building on the work done under the existing Galway Transport Strategy, which is being reviewed and updated this year, and the current Cork Metropolitan Area Transport Strategy (CMATS). In each metropolitan region, the metropolitan area transport strategies sets out the vision and objectives for park and ride and identify the zones for intervention for both bus and rail based strategic park and ride sites.

The Department and the NTA also recognise that the development of park and ride facilities should be aligned with the delivery of other supporting infrastructure, in particular bus corridor infrastructure, and that the development of facilities without the prior delivery of bus lanes or some form of bus priority for buses connecting to/through urban centres, may not fully optimise their

benefits. The roll-out of BusConnects to date across Dublin, has included the introduction of additional bus lanes in the city, which is a welcome development in tackling the impact of congestion on travel times. The introduction of further bus lanes in the context of the Park and Ride proposals would need to be considered on a case-by-case basis, and take into consideration the relevant planning regulations and existing policies around road space allocation in the area. In this context, the Department is currently developing a new National Demand Management Strategy which is expected to be published for consultation by end 2023. Access to public space by various vehicles may be considered within the context of road space reallocation.

With regard to motor tax and the proposed introduction of a credit for use of park and ride facilities, it should be noted that any proposed changes to existing tax measures, or the introduction of a new tax credit, would fall under the remit of the Department of Finance.

As highlighted, a further key design consideration in the development of Park and Ride facilities is the appropriate level of EV charging point provision and ensuring that sites are future proofed to provide appropriate numbers of EV charging points necessary to meet future demand. It is essential that the right chargers are installed for the right purpose and in park and ride locations it is likely that AC chargers will be most suitable as people will leave their cars for long durations while travelling onwards by public transport e.g. to work. However, depending on the location, the installation of rapid charger technology will also be considered along with the slower AC chargers.

In particular, where Park and Ride sites are in close proximity to a motorway or the national road network, these could provide good opportunity for installation of a rapid charging facility. Park and Ride facilities also have an opportunity due to their size and as they are green field sites to include renewable energy options such as battery back-up storage and solar panels to allow renewable energy to be harvested at night and used during peak hours during the day. Local Authorities are developing their EV Strategies and will be considering these locations as part of their strategy development.

I note also that the Government is strongly committed to providing all citizens with reliable and realistic sustainable mobility options, and an integrated public transport network plays a key role in the delivery of this goal. There are ambitious plans in place to continue to improve public transport connectivity and integration within the network in the coming years, with the continued roll-out of programmes such as BusConnects and Connecting Ireland, in addition to the ongoing enhancements that are being made to the existing network.

Work is also ongoing in relation to improving and augmenting schedules to improve efficiencies and reduce wait times for passengers. Significant analysis is undertaken by the Department of Transport, the National Transport Authority and other key public transport stakeholders, in relation to passenger trends and travel patterns. This analysis is then used to inform policy decisions about the allocation of resources and changes to the network, which is going through an unprecedented period of change in adapting to changed travel habits post-Covid-19. The NTA is also progressing work on the introduction of Next Generation Ticketing, which will further improve the reliability of passenger data and accuracy of real-time information.

In relation to the suggested introduction of fiscal measures as a means of managing private car travel demand into cities, it was recognised in CAP23 that we must address the base demand for transport, and that strong policy direction at a national level is required.

To this end, work on the development of a new National Demand Management Strategy commenced in 2023. The Department of Transport has convened a cross Departmental multi-agency steering group to oversee the development of the Strategy. Six sub-groups have also been established comprising a diverse range of national and international experts from government, industry, representative bodies, and academia, among others to identify issues, potential measures and implementation pathways in the following key areas:

1. Optimal Use of Space;
2. Fiscal Measures;
3. Generators of Demand (Education, Public Sector, Tourism and Sport);
4. Generators of Demand (Freight, Industry and Retail);
5. Integrated Land Use and Transport Planning; and
6. Captive Car Users

As well as building on the recommendations from the Five Cities Demand Management Study, which was published in November 2021, potential measures will be informed by national and international best practice and will be considered according to their relative impacts in terms of demand reduction, road safety, economic opportunity, and wider health benefits from reduced air pollution and a more active population.

In the context of fleet decarbonisation, the NTA is progressing the transition of its urban bus services to a zero-emission bus fleet. No new diesel-only buses have been purchased for urban public service obligation (PSO) bus fleets since July 2019, as set out in the National Development Plan 2018-2027. The transition to a zero-emission urban bus fleet is currently programmed to take up until 2035, based on replacement of non-zero-emission buses as they reach the end of their efficient service lives. The first of 120 double-deck battery-electric buses should enter passenger service in the Dublin area by early next year. These 120 buses are part of a framework to provide for the procurement of up to 800 fully electric buses over a period of five years. As fully electric buses, these vehicles will operate with zero tailpipe-emissions, which will contribute to a substantial improvement in air quality in cities and towns.

To promote the decarbonisation of heavy duty vehicles, the Department of Transport has appointed TII to administer the Alternatively-Fuelled Heavy Duty Vehicle (AFHDV) Purchase Grant Scheme. The AFHDV Scheme is intended to assist the purchase of heavy duty vehicles (HDVs) which are alternatively-fuelled and meet applicable European Union (EU) environmental standards, which would otherwise not have been purchased without the Scheme's support. The Scheme awards grants to assist companies and enterprises wishing to buy new alternatively fuelled heavy duty vehicles supported by the AFHDV scheme as opposed to the diesel equivalent. Grant amounts are calculated as a percentage of the difference in price between an AFHDV and its diesel equivalent.

The supported fuel-types are:

1. Battery Electric Vehicles;
2. Fuel Cell Electric Vehicles

An increased budget of €5M was allocated to this scheme for 2023, with overall grants paid since 2021 to date of c.€3M. This reflects our support for the accelerating switch to low- or zero-emission heavy duty vehicles as a wider range of vehicle models come to market. While there is no specific purchase grant scheme for HDV PSVs, there is the option for private operators managing public services contracts to apply for bus category vehicles from 11 up to 65 seats through the AFHDV Purchase Grant Scheme.

The 2023 eSPSV scheme to buy electric vehicles (for small public service vehicles, such as taxis, hackneys and limousines) also has an allocation of €15m for 2023 with grants of up to €20,000 now available to existing SPSV drivers who scrap older, high mileage vehicles for new full-electric models. Grants of up to €25,000 are also available for existing SPSV drivers who scrap older, high mileage vehicles for a wheelchair accessible new battery electric vehicle. To be eligible for the enhanced support level the applicant must be an existing SPSV driver; their vehicle must be registered as an SPSV for the previous three years; and the vehicle must be within three years of its maximum permissible age, or have a mileage of 300,000km or greater. Grants are also available for new SPSV entrants and SPSV drivers who do not qualify for scrapping a vehicle and receiving enhanced support.

With regard to renewable transport fuels, including biofuels, the supply of renewable energy in transport consumption is mandated in Ireland through the renewable transport fuel obligation (RTFO) on fuel suppliers, currently set at a rate of 17% of renewable energy that fulfils EU criteria for sustainability and GHG savings as a proportion of total road transport fossil fuel supply. Obligated parties (fuel suppliers) have a variety of renewable fuel pathways to meet the national mandate, e.g., ethanol in petrol, biodiesel in diesel, etc. incentivising a competitive market action to deliver increased renewables in transport. The Biofuel Study Report 2022 estimates that there will be sufficient biofuel, including HVO supply, to meet the Climate Action Plan 2030 biofuel target. The Renewable Transport Fuel Policy 2023 - 2025 ( available at <https://www.gov.ie/en/publication/af803-renewable-transport-fuel-policy-2023-2025/>) provides a framework for ongoing consultation, analysis and review towards meeting targets set out in the Climate Action Plan 2023 and European obligations for renewable energy supply for use in transport. As currently agreed by Government, the Minister has no plans to review the Renewable Transport Fuel Policy or the biofuel target as set out in the Climate Action Plan until at least 2025.

HVO supply can count towards the national mandate and the Climate Action Plan 2030 decarbonisation target whether it is sold blended with diesel or as 100% HVO. It is understood that some fuel suppliers have recently started to provide a small number of HVO only pumps at service stations where it is commercially viable to do so, catering mainly for HDV refuelling.

In line with the recently adopted EU Alternative Fuels Infrastructure Regulation (AFIR), the Department will also be working to update the existing National Policy Framework (NPF) for Alternative Fuels Infrastructure over the coming year, which will further consider the role of alternative fuels and refuelling infrastructure in road transport as mandated by the AFIR regulations, and the development of this NPF will be subject to public and stakeholder consultation. Supports required for recharging infrastructure under the AFIR are also being considered in the context of the National En-Route EV Charging Network Plan, which was recently published for public consultation. The Department also intends to launch a call for submissions to inform the update of our National Policy Framework for Alternative Fuels Infrastructure before the end of the year. In this context, we would like to encourage your further participation in this forthcoming consultation process.

I hope the information above has been helpful and would again like to thank you for your correspondence.

Yours sincerely,

Patrick Leonard  
Private Secretary to Minister of State Jack Chambers TD

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**An Roinn Iompair**

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