

Climate Change Unit,
Department of Transport, Tourism and Sport,
Leeson Lane,
Dublin 2,
D02 TR60

28 August 2019

Dear Faye,



McCumiskey House
Richview
Clonskeagh Road
Dublin 14
D14 YR62
Phone: 01 2680180
Email: info@climatecouncil.ie

RE: Draft Statutory Climate Change Adaptation Plan for the Transport Sector

In line with Section 6 and Section 11 of the Climate Action and Low Carbon Development Act 2015 (the Climate Act), it is a function of the Climate Change Advisory Council to provide advice and make recommendations in relation to adaptation policy and Ministers are required to consult with the Council in the preparation of their sectoral adaptation plans.

The Council welcomes the publication of the draft Statutory Climate Change Adaptation Plan for the Transport Sector and believes that the sectoral adaptation planning process offers a valuable opportunity for sectors to build resilience to the impacts of climate change by identifying vulnerabilities, adaptive capacity, risks and opportunities, and developing adaptation plans to address them.

The Council has agreed criteria of assessment for sectoral adaptation plans and the draft Statutory Climate Change Adaptation Plan for the Transport Sector has been considered by the Climate Change Advisory Council and its Adaptation Committee with reference to these.

The Council wishes to outline the following observations on the draft.

General Comments

- The plan provides a good description of the Irish transport sector, its constituent parts and the context within which it operates. Some of the figures, examples and photographs used to illustrate points are particularly useful. Appendix III providing information on how the previous non-statutory plan has been reviewed, monitored and implemented is also useful.

- Chapter 7 of the Council's [Annual Review 2019](#) contains advice and recommendations relevant to the development of sectoral adaptation plans and these should be considered in the preparation of the final plan.
- In chapter 3 it is not currently clear how impacts that are of immediate concern and where action can be taken to reduce detrimental consequences and realise immediate benefits (i.e. urgency) were considered in the prioritisation.
- The Council acknowledge the inclusion of text on tourism and sport. Though this is not the required statutory focus of the plan it is important that Departments take the opportunity to begin mainstreaming climate resilience across their functions. Further literature on the impacts of climate change for tourism and sport could be considered in this section to ensure it reflects current knowledge. The Council trust the impacts of climate change for these sectors will receive further attention in national adaptation policy in future.
- In the case studies further information such as the cost of recovery measures, the basis for the funding of any adaptive measures and consideration of the 'Build Back Better' principle, and how the case studies have resulted in any changes to preparedness measures should be provided. The coastal case study should further consider sea level rise and other climatological (rather than meteorological) conditions. When reviewing the impacts of Storm Ali, further analysis of the insights into the adaptive capacity of the stakeholders as well as the differences in exposure and sensitivity should take place.
- Further detail of the costs, benefits, trade-offs and co-benefits of actions should be provided.
- The presented linkages with the SDGs are welcome but more information should be provided on how these will be monitored and reported on.

Trends and Projections

- Further detail is required when setting out observed and projected trends in key climate variables, including for example their seasonal timing, and also statements such as 'more stable summer climate' should be clarified. Much of the climate information provided is on average conditions. The relevance of 'average annual temperature' should be reconsidered when infrastructure does not necessarily react to these but rather to temperature that exceeds operational thresholds, for example.
- More clarity on how the climate information provided can be used to identify and assess adaptation measures (beyond providing a better understanding of specific risks) is required.

- It should be noted that the narrative of regional variations in precipitation between the east and the west depends on which regional/global climate model combination is used. It should therefore be used carefully and referenced and is subject to uncertainties.
- The Council's Annual Review 2019 recognises the value in common projections but the draft plan's focus on medium emission scenario warming and a medium-term timeframe is not wholly appropriate given major infrastructural investments which will take place over the coming years and have a design life and expected service level beyond mid-century (as is recognised in section 4.1). This is particularly relevant given our current emissions trajectory. It is critical that an approach to stress testing such investment/infrastructure be put in place or at a minimum included in the adaptation plan as an action to be taken forward.
- Though box 3.1 is useful, the application of RCPs and the given timeframes should be reexamined (for example RCP 4.5 is used for temperature and RCP 8.5 for precipitation).

Risks and Prioritisation

- In chapter 3 it would be useful to provide some indications as to the extent the overall sectoral risk levels vary (now and in the future) for different modes within the transport sector and in different geographic areas across Ireland.
- It is unclear how slow onset changes are considered and will be part of the adaptation planning.
- Further detail could be given in terms of consultation with the sector and how views were integrated, especially in prioritisation and the identification of adaptation options. This helps establish whether this draft is representative of the views of key stakeholders.

Cross Sectoral Considerations

- The discussion on port infrastructure in the agriculture, forest and seafood sectoral adaptation plan and in this plan should align where appropriate.
- While there is reference to aligning adaptation planning with emergency planning further information on what this means in practice for the sector should be provided. Further consideration of the reliance of emergency planning and response on transport infrastructure should be included.
- Links to other critical infrastructure sectors are welcome but the Council note that emphasis is not necessarily evident in other draft plans in the theme to date. The

proposed midterm review of the critical infrastructure plans will be important. This should inform future national adaptation policy but this is not included as an action in the draft communications sectoral adaptation plan, for example.

- Links to the health sector in terms of both active travel and overheating are under explored.
- How adaptation is considered in the Planning and Land Use and Transport Outlook based on the National Planning Framework is not clear. How climate risks will inform route locations for investments under the National Planning Framework as suggested within action 16 should be explained further.
- Further examples of the overlap anticipated between national and local transport adaptation would be useful and further information should be provided in the sectoral adaptation plan on where transport adaptation measures have areas of intersection for parallel sectoral areas.
- When discussing the regional and local road network and its role it would be useful to estimate its relative contribution to local economic activity.
- Further detail on the reliance of CNG stations, the current and future recharging network and traditional petrol and diesel distribution and service station on the electricity network should be provided.
- Much useful mapping of key transport infrastructure is included however this should also include key walking and cycling infrastructure investments.

Implementation

- How the three implementation objectives presented address priority risks should be more explicit.
- Further links to mitigation in the objectives and actions would have been expected. Further consideration of the lessons from the all-of-Government approach to mitigation and a national level risk assessment referenced in the document should be presented. The final plan should further consider ways to promote the linkages between climate-resilient and low-emission infrastructure design and technologies.
- Further information could be provided on action 7 to make clear how it differs from action 14.
- Further information on the process and outcomes of actions 16 and 17 is required.
- The Council suggest that actions 18 and 19 should be ongoing, but including mid-term (e.g. 2021) evaluation/reporting.
- A number of knowledge and data gaps are identified throughout the document (for example, the lack of criteria to prioritise investment in adaptive capacity; the need for

a methodology to capture cross cutting consequences; the inclusion of planned Project Ireland 2040 infrastructure in mapping) but it is not clear how these will be addressed in the actions.

- Chapter 7 of the Council's Annual Review 2019 addresses adaptation indicators and this discussion should be considered when developing final indicators for the plan.

The Council looks forward to the publication of the final statutory sectoral adaptation plan.

Yours sincerely,

Prof. John FitzGerald

Chair

Climate Change Advisory Council

Cc. John O'Neill, Department of Communications, Climate Action and Environment