



Response to the Public Consultation on Connected and Autonomous Mobility in Road Transport

**Submitted to
Department of Transport**

www.westerndevelopment.ie

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Western Development Commission Response to the Public Consultation on the Connected and Autonomous Mobility in Road Transport

Introduction

The Western Development Commission (WDC) is a statutory body operating under the aegis of the Department of Rural and Community Development, promoting economic and social development in the Western Region of Ireland (the counties Donegal, Sligo, Leitrim, Roscommon, Mayo, Galway and Clare). The WDC¹ is involved in policy analysis, the promotion of regional initiatives and the operation of the Western Investment Fund.

The WDC has recently published a report on the key issues for Rural Dwellers in 'Making the Transition to a Low Carbon Society in the Western Region'² and has commenced a project on transport and mobility in small towns and rural areas. As part of our sustainable enterprise programme the WDC is working with the Future Mobility Campus Ireland (FMCI) based in Shannon and will shortly be issuing a call for innovative Green and Smart projects to identify potential areas of opportunity in the region. Some of the successful projects may be in the areas of transport and mobility.

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Question 1. What are the overarching guiding principles that should inform the roll-out of CAM in Ireland?

- CAM should be seen as a nationwide opportunity. It is important that the focus of CAM developments are not just in urban areas or on the motorway and national road networks. CAM can present many opportunities for rural mobility and, while there will be different challenges for rural roads, these areas must be considered in any CAM strategy.
- People living in rural areas tend to be at greater distance from services than their urban counterparts, journeys made tend to be longer and more car based. Greater distance from employment and service reduces travel options and lack of public transport and the distance to public transport services increases reliance on car travel in rural areas. At the same time there is latent travel demand in terms of trips that would be made if the service to travel options were available. These all present significant opportunities for future mobility in rural areas. It is essential that the new strategy has a focus on these and on recognises that CAM

¹ See www.westerndevelopment.ie for more information

² <https://www.westerndevelopment.ie/policy/publications/making-the-transition-to-a-low-carbon-society-in-the-western-region-key-issues-for-rural-dwellers-august-2020-full-report/>

must be developed for the types of roads and services required in rural areas as well as elsewhere.

- It is also important that strategies for the development of CAM are associated with the move to low carbon transport, and opportunities for development of the low carbon economy. This means that CAM vehicles must be low carbon (at all lifestyle stages as well as in relation to energy used) and that CAM facilitates an overall reduction in vehicle use and vehicle journeys, whether this is through vehicle sharing or ride sharing or other methods.
- CAM provides considerable opportunities for Research, Development & Innovation. It is critical that strategies for the development of CAM incentivise indigenous research and innovation, especially in the areas of rural mobility, to position Ireland as a leader in CAM technology.

Question 2. What do you see as the main areas that should be included in a national CAM strategy?

CAM is an important area with many wide ranging opportunities and implications. Some examples of the areas which should be considered are listed below but this is not an exhaustive list.

- Before the roll out of CAM, legislation is required to allow for the testing of autonomous vehicles on public roads. Without this, progress in developing CAM in Ireland will be stalled. The testing, trialling, standards and development must all be considered in a national CAM strategy.
- Risks of CAM, safety and standards need to be included.
- Privacy concerns must also be addressed.
- Use of data and common data standards need to be considered.
- There are significant opportunities for enterprise and innovation associated with CAM alongside opportunities for the development of associated skills. Making the most of these benefits should also be a part of the strategy.
- Supports for research and development to enable a wider CAM ecosystem are important.
- Sustainability (both low carbon and circular economy) needs to be considered and integrated into CAM development in Ireland.
- CAM is a new technology and people are likely to be concerned about its implementation. They may have safety concerns, concerns about its potential impact on employment or social interactions. There needs to be public engagement which will address these concerns. Education about what CAM is and how it might operate in Ireland will also be important.
- There should be a focus on developing new employment opportunities associated with CAM, for example in the area of monitoring. Reskilling people whose employment may be affected by CAM is also important.
- There needs to be a focus on opportunities for CAM in rural, remoter and less densely populated areas. The issues for development of CAM in these places needs specific consideration in the strategy.
- Physical, and digital infrastructure are weaker in rural and remoter parts of Ireland while communication networks have poorer coverage. How these issues will impact on CAM development needs to be addressed.

Question 3. In your opinion, what strategic goals should Ireland adopt for CAM? What are the outcomes to be achieved?

- CAM should be an integral part of mobility in Ireland in the future.
- Harnessing the potential benefits of CAM for those currently who are transport disadvantaged should be a specific goal, so that it can be used to address the needs of those who don't or can't drive and who do not have good access to other transport options.
- Realizing the innovative potential of this new mobility system will provide a range of opportunities. Ensuring that Ireland is in a position to be at the forefront of such innovation is an important strategic goal. This will require support for research, development and innovation.
- In order to take advantage of potential opportunities and innovations there needs to be a clear roadmap for how CAM can be adopted as part of the development of transport and mobility in the short, medium and long term.

Question 4. What do you see as the greatest opportunities associated with CAM in Ireland? How can Government facilitate these opportunities?

- Future Mobility Campus Ireland is already working in this area in the Shannon region. There is an opportunity to develop a cluster of enterprise associated with CAM which would bring national benefits and provide the opportunities to play an international role in the area. This competence can be applied in other areas such as AgTech and servicing offshore energy.
- The development of legislation and trials, and the skills and innovations required for CAM will add to the knowledge and enterprise opportunities from this technology.
- CAM can provide an opportunity to increase inward investment and create jobs, both directly within the CAM industry and more broadly as the technology is rolled out there should be opportunities for innovation in use.
- CAM could also provide the opportunity to develop better rural and regional mobility service addressing some of the current areas of transport disadvantage.
- It can also provide the opportunity to enable the low carbon transition, providing (if appropriately managed) more sustainable transport options.
- Developments of CAM should allow transport provision for those who have difficulties using current transport options for reasons of age (old or young),

Question 5. What do you see as the main barriers to the development and deployment of CAM in Ireland? How can Government best address these barriers?

- Lack of legislation which allows for testing on public roads is a significant barrier.
- Public concerns about safety of CAM and trust around the use of personal location data.

- There needs to be a clear, whole of government approach to the development and adoption of CAM across a variety of transport issues and conditions in Ireland. The forthcoming strategy will hopefully achieve this.
- Funding is needed for research and development on the very wide range of areas associated with CAM development and potential use.

Question 6. What do you see as the greatest risks associated with the roll-out of CAM in Ireland? How can these areas of concern be mitigated?

- There are potential safety concerns with CAM so it is important that the regulation is in place to ensure that system standards are maintained and that any concerns can quickly be addressed.
- Connectivity and data essential to the use of CAM may be vulnerable. Standards in this area must be clear and effective.
- CAM is developing globally, and slow rollout of legislation or a strategy for CAM in Ireland risks delay and loss of opportunity for potential development of a significant industrial cluster in Ireland.
- If regulation is not seen to be strong and effective and if policy does not address potential public concerns there is a risk of poor public acceptance of the technology. Legislation, regulation and policy must be transparent and effective.

Question 7. What do you see as the most pressing issues to be addressed in the immediate term (as opposed to a medium-term or longer-term perspective)?

- Legislation to support the testing of automated and autonomous vehicles on public roads is urgently needed.
- Funding for research and development of CAM for Irish conditions and Irish needs is essential. This, as noted previously, must cover the needs of rural and remoter parts of Ireland.
- It is important that a whole of government approach is taken in this strategy and in the development of CAM.
- The employment implications for people working in driving and delivery must be addressed.

Question 8. Any additional comments

- It is important that the strategy takes account of the needs of all parts of Ireland and that developments of CAM are widely applicable. If this is not the case there will be a risk that remoter and more rural parts of Ireland are left behind, not only not able to take up the opportunities provided by CAM but further disadvantaged as CAM vehicles will be less inclined or unable to travel to these unserved areas, exacerbating existing transport disadvantage.

If you would like more information or to discuss any of the issues raised in our response please get in touch.

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