



Western Development Commission

Submission to Public Consultation

on

Investing in our transport future

A strategic framework for investment in land transport

to

Department of Transport, Tourism and Sport

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Introduction

The Western Development Commission (WDC) welcomes this opportunity to make a submission to the Public Consultation on Investing in Our Transport Future, A strategic framework for investment in land transport (SFILT) issued by the Department of Transport, Tourism & Sport, August 2015.

The WDC is a statutory body established by government to promote, foster and encourage economic and social development in the Western Region¹. It operates under the aegis of the DECLG². The WDC works in co-operation with national, regional and local bodies involved in western development to ensure that the Western Region maximises its full development potential.

One of the functions of the WDC is regional policy analysis. The WDC seeks to ensure that government policy reflects the needs and maximises the potential of the Western Region in such areas as infrastructure, natural resources, enterprise and regional and rural development. It also tracks the implementation of policies and recommends adjustments as appropriate. It is in this context that the WDC welcomes the publication of the SFILT Steering Group Report and associated background papers and the opportunity to submit its insights into the policy formulation process.

Previous WDC submissions on transport issues and the transport needs of the Western Region are all available on the WDC website, <http://www.wdc.ie/publications/submissions/>. If there are any queries in relation to this submission please contact Deirdre Frost, Policy Analyst at deirdrefrost@wdc.ie.

Structure of WDC Submission

First, the WDC sets out what it believes should be some of the main principles underlying the strategic framework for investment in land transport and also makes some observations on some of the data used. (Section1)

This is followed by comment on the SFILT Steering Group Report (SFILT), ‘Investing in Our Transport Future’. This will follow the structure of the Steering Group report. In some instances comment is provided on the associated background paper. (Section 2)

In examining priorities for transport investment for the Western Region, the WDC conducted a short survey of the transport priorities of companies funded through the WDC operated Western Investment Fund. Their views and the priorities they identify are reported in Section 3.

Finally, the current road priorities in the Western Region are listed in the Appendix.

1. Principles to underpin the Strategic Framework for Investment in Land Transport

In this section the WDC sets out what it believes should be some of the main principles underlying the strategic framework for investment in land transport and also makes some observations on some of the data used.

Generally principles are devised first and these then provide the framework for the priorities (in the SFILT the priorities are set out first). Principles should be broader and reflect the long-term overall objectives for land transport. Once these have been set, priorities which are in line with the principles can be identified.

The WDC considers that there is little future thinking, on what the land transport network **should** look like, not what it may look like, if current spatial patterns and modal choices continue. This

¹ Counties Donegal, Sligo, Leitrim, Roscommon, Mayo, Galway and Clare.

² Department of the Environment, Community, and Local Government.

vision would be linked to the principles which then would help determine the priorities as discussed in Chapter Six.

- The SFILT suggests that the primary objective of investment in land transport should be economic growth. While this is clearly an important priority, any strategic framework must consider, and be applicable to, the long term. Investments made, including those in the short term, under the 2015–2019 multi-annual capital funding framework and its successors, will be in use and will influence our transport networks at least for the next thirty years. Therefore, whatever the urgent short term needs, the long term situation and the long term implications of all investments must be considered carefully. Thus factors like balanced regional development, sustainability and social inclusion have to be considered equally important objectives.
- An underlying presumption of the SFILT is that employment should be concentrated in cities and that planning should ensure that people are concentrated close to this employment. However, there are also opportunities for employment to be more dispersed, in line with current population patterns. Towns, smaller centres and rural areas provide a variety of opportunities as locations for employment across many sectors (not just agri-food and tourism). Commuting travel demand can also be reduced if employment is more dispersed, in line with current population patterns. In 2011 61% of rural dwellers (excluding farmers) worked in towns or rural areas illustrating the potential to stimulate employment closer to where people live.
- Alongside these more dispersed employment opportunities there is significant potential to make the most of the opportunities provided by trends in technology development, the growth of services employment, a move to more varied working hours , and greater remote and home working opportunities as well as incentives for enterprises to offer different work arrangements (timing of day, tele-working). These trends will change the way people work and how often they actually travel for work. The SFILT should highlight that active policies to encourage and facilitate new work practices can help manage and reduce future travel demand in a sustainable and cost effective way that also has quality of life benefits.
- Rural transport needs to be addressed far more centrally in the plan. Over 40%³ of the population (68% in the WDC region) live in rural areas and smaller settlements. Rural dwellers' transport demand issues should be central to the SFILT. There is a clear imbalance in the focus given to transport issues for cities against rural transport issues. There must be more consideration of transport issues for smaller settlements and rural areas which currently account for 48% of all trips (compared with 32% for the four main cities). The majority of the population will continue to live in the historical settlement pattern and spatial planning will not change that pattern significantly even in the long term (thirty years is assumed as the long term in the Framework). Thus a transport investment framework needs to focus on current spatial patterns as well as any future growth in demand.
- As discussed above, the principles of the SFILT must focus on long term needs and be in line with future transport expectations and policy goals. One of the key aims of the EU 2020 Strategy is to support a shift towards a resource efficient and low carbon economy and decouple economic growth from resource and energy use. In addition such a shift to greener lower carbon activities is an important response to rising energy prices and emissions. In the short term, EU 2020 targets in relation to energy efficiency, emissions and use of renewable energy are already in place, and failing to meet these targets will be very costly. In the longer term these issues are likely to grow in importance. The effects of any transport decisions on our use of energy and on emissions need to

³ Total population living outside centres of 2,500 in the State 1,858,327 (40.5% of national population). Total population living outside centres of 2,500 in Western Region 558,093 (68% of population). CSO Census of Population, 2011

be central to investment decisions. Any framework for development of land transport must have a focus on energy efficiency and lower carbon use at its core.

- An important proposal in the Strategic Framework is that Local Authorities should fund ‘non-strategic’ roads from their Local Property Tax (LPT) intake. This proposal appears to be directed at rural roads but rural areas with lower house values and dispersed populations tend to have lower LPT incomes while at the same time having more of these local roads. The WDC has major concern about this proposal and its implications.
- The WDC recognises that investment in transport infrastructure will not achieve regional growth by itself, quality transport infrastructure is still a necessary element of any strategy for regional growth. The need to have an integrated regional development policy does not mean that the absence of such a policy reduces the need for transport investment. In fact it is important that the benefits of investment in regional transport infrastructure are fully realised by ensuring that, alongside transport investments, there are broader regional policies to enable us to make the most of our transport assets.
- There is a need to note the importance of transport in accessing health services. Good transport, in terms of journey times on the road network and better public transport services are needed to access health services generally and to hospitals in particular. Health services are increasingly concentrated in centres of excellence, especially for critical illness such as cancer and various specialist services. In particular in the Western Region better transport access is needed to serve the entire catchment of Galway University Hospital, serving the entire West and North West regions.

Data issues

Some of the data used to provide evidence is very limited and not comprehensive enough to form the basis for policy. For example, non publicly funded public transport is completely absent from the analysis. The assessment of demand and use of bus transport does not include any private bus operators. No reference is made to private bus operators, if only to acknowledge that the data has been omitted from the analysis.

A second example is the only enterprise indicator used which states ‘... Dublin, Cork and Galway accounted for 82% of employment in new foreign firms for the period 2007 to 2011’. This is used to illustrate the concentration of these new foreign firms in the three largest cities. However only using this indicator is very limited when the purpose is to identify transport needs for enterprise. It excludes all Irish firms – which are more geographically dispersed – and excludes all foreign firms established before 2007 – which are also more geographically dispersed.

The WDC has some concern over the conclusions drawn from the data. The SFILT starts by saying that the trips data shows the importance of our cities with Dublin city generating 24%, Cork, Galway & Limerick combined generate 8%. However this means that only 1 in 3 of all trips are from the four largest cities. This data really shows the importance of towns and especially rural areas for trips (nearly half). There is much emphasis in the text is on the cities but from the trips data, small settlements (under 2,500) and rural areas account for almost half of all trips and considerably more than the cities.

It is noted that much of the analysis is at national level and acknowledges that regional and local trends are vital to understanding spatial variations. It is unfortunate that more regional and local analyses have not been undertaken, given the availability of the data.

2. Comments on Steering Group Report

In this section we make specific comments on the content of the SFILT report.

Key Issues

The assumptions regarding future commuting patterns seem to be based on the assumption that the current concentration patterns will be intensified and do not make reference to spatial planning under a new National Planning Framework. There also appears to be no consideration of changing working practices such as more home working, flexible hours or a greater dispersal of employment location. p.viii. Bullet 4.

While improved spatial planning will play a key role, transport provision will need to address current spatial patterns as well as future growth. The majority of the population will continue to live in the historical dispersed settlement pattern and spatial planning will not change that even in the long term (thirty years is assumed as the long term in the Framework). Thus the Framework needs to address travel demand based on the current spatial patterns and population distribution as well as any future growth. Bullet 6.

The ratio of transport-related taxation revenue to Exchequer expenditure and the trends over time is interesting. It would be useful to draw on international comparisons with regard to the tax-expenditure ratio in considering the steady state. Bullet 9.

The current level of expenditure is particularly low and should be noted here. p.ix.Bullet 2.

It should be noted that compared to other comparator countries Ireland has invested a lot less in land transport. Bullet 3.

The level of investment in rail compared to road is particularly low as comparison with the evidence from European countries shows. There is always a need to ensure value for money in transport investment, but evaluation must be holistic and consider the full range of benefits and costs including such things as environmental benefits gained from increased use of rail freight. The immediate financial difficulties at Irish Rail should not lead to short term decisions when considering a long term framework. Bullet 4.

A strategic road network should be defined, but so also should a strategic rail network. If we are serious about increasing the modal share of sustainable transport modes then the rail network is a critical element. Bullet 5.

There seems to be a suggestion that there will be a reduction in the extent of the transport network which seems premature in a framework document and also highlights more the short term perspective evident in parts of the document. It is also of concern in that any reduction in the extent of the network will impact more heavily in regional/rural locations including the Western Region. Presenting this as the final key issue presents a negative view of the value and contribution of a good transport network to the effective functioning of economy and society. Bullet 6.

Introduction

The WDC notes both the short term and long term objectives of the Framework. Unfortunately throughout the report there seems to be an inherent tension between the short term view (reflected in the very constrained economic environment in which it was written), and more long term strategic thinking as to what the land transport network will look like thirty years hence. p1. Paragraph 2.

In addition, there is little future thinking evident, on what the land transport network **should** look like, not what it may look like, if current spatial patterns and modal choices continue). This vision would be linked to the principles which then would help determine the priorities as discussed in Chapter Six.

Key features of the framework policy

Focus on economic growth

The transport network supports a wide range of objectives and it is welcome that these are articulated, especially the need for balanced regional and rural development.

However the SFILT has adopted the economic role of transport as the primary objective, which relegates regional development, social issues and sustainability to less important objectives. This is an example of the tension between short term and long term priorities and is written in the context of the immediate economic environment in which it was written which was particularly constrained. It is important that the long term objectives are central to the formulation of the Framework.

Decisions made on transport infrastructure now have very long term impacts. All investments will have a long useful life and therefore should take into account, as far as possible likely future conditions and strategies reflecting them (e.g. energy efficiency in transport and climate change objectives, regional balance, changing work practices). It will be harder to meet long term goals and the full range of policy objectives, if the wrong decisions are made now. p1

SECTION A: Setting the context

1.1 Population, economic and spatial issues

Rural and Urban

In understanding the spatial distribution of the population it is important to acknowledge the extent of rural and urban. Over 40%⁴ of the national population (68% in the WDC region) live in rural areas and smaller settlements. The top 5 most rural counties in Ireland are in the Western Region (Leitrim (89.6%), Galway county (77.4%), Roscommon (74%), Donegal (72.5%) and Mayo (71%)). The Western Region also has a higher share of the population living in smaller towns. For example 16.4% of the total numbers living in Aggregate Town Areas in the Western Region live in a town of 1,500-2,999 people compared with 6% in the state. Transport policy and investment must have the needs of rural and small town users across the State at its core.

Spatial issues

Reference to population growth occurring in towns rather than cities should distinguish between types of towns. Much of the town population growth occurred in towns within commuting distance of cities, supported by the investment in the motorway network, rather than other more remote towns. p.4.

'Changing trends in where people live are not matched by equivalent changes in the location of employment'. The underlying assumption seems to be that employment location will become more concentrated. It is implied that changing the situation means changing population patterns to match employment locations, rather than the possibilities of better matching employment location with population distribution. p. 5.

The WDC conducted an analysis of commuting from rural to urban areas for employment. In 2011, 35.5% of workers in Ireland lived in rural areas, while 21.3% of all jobs were located there. Over a third of all rural dwellers (37%) worked in rural areas. A further 24.4% commute to towns and 19%

⁴ Total population living outside centres of 2,500 in the State 1,858,327 (40.5% of national population). Total population living outside centres of 2,500 in Western Region 558,093 (68% of population). CSO Census of Population, 2011

commute to gateways⁵. This highlights the need for a better dispersal of employment opportunities closer to where people live in order to reduce transport demand.

Employment is only one factor generating trips. The 2009 National Travel Surveys showed that 70% of all trips are *not* related to employment. The place of employment is therefore only one consideration and often not the primary consideration in determining place of residence. The importance of these non-work trips and the potential for change in this demand needs to be more central to the SFILT.

The data on employment growth in the cities between 2006 and 2011 shows that the recession led to increasing concentration of jobs in the cities which continued to increase certain types of employment through the downturn. Sectors such as International services and IT for example continued to experience growth in the cities. As a result, more people needed to commute to a city to find employment as employment opportunities outside of the cities declined sharply. p. 5

It is noted that much of the analysis is at national level and acknowledges that regional and local trends are vital to understanding spatial variations. It is unfortunate that more regional and local analyses have not been undertaken, given the availability of the data. The WDC has undertaken some analysis, examining labour catchments in the Western Region using Census 2006 data and examining rural commuting to urban centres in 2011. Both these reports provide robust evidence of transport patterns at a regional and local level and also some very insightful findings which should form part of the evidence base for the transport framework⁶. p. 5

1.2 Transport demand trends and modal issues

Car demand

The point that some predominantly rural counties (Cavan, Monaghan) had low car ownership levels is important in considering rural transport provision. Many rural counties have high car ownership levels. p.6

Public transport: Bus and rail

There is no reference to rising unemployment and emigration as key factors in reducing passenger demand, especially for bus services. Over the period of the economic boom, immigrants especially were heavy users of public transport services. When unemployment rose and many immigrants left, this demand declined. p. 7.

Non publicly funded public transport is completely absent from the analysis. The assessment of demand and use of bus transport does not include any private bus operators. No reference is made to private bus operators, if only to acknowledge that the data has been omitted from the analysis. p.7.

The SFILT states that journeys on publicly provided services in 2012 were only 7% above 1998 levels. The conclusion drawn is ‘These recent trends in public transport use are in marked contrast to the strong growth and stability of car use’. However a conclusion about poor growth in public transport use cannot be made in the complete absence of data on the use of private bus operators. The period under discussion coincided with considerable growth in the number of private operators and their service frequency, both inter-city services and town services. Even if ultimately there has not been as strong growth in bus use as car use, it is would be definitely stronger than the figures for publicly funded services alone would indicate. Making transport investment decisions e.g. on quality bus

⁵ The remainder is accounted for by the categories of mobile workers and blanks. WDC Policy Briefing No.6 Commuting to Work: Rural Dwellers, Urban Jobs. http://www.wdc.ie/wp-content/uploads/WDC_Policy-Briefing-no-6-Commuting-Final.pdf

⁶ <http://www.wdc.ie/wp-content/uploads/wdc-travel-to-work-and-labour-catchments.pdf> and http://www.wdc.ie/wp-content/uploads/WDC_Policy-Briefing-no-6-Commuting-Final.pdf

corridors, lay-bys for bus stops, solely based on demand for publicly funded bus services will be entirely inadequate.

Mode shares

Goods vehicle demand

There should be more discussion of rail freight in the SFILT. As a more sustainable transport freight mode, especially for high volume goods, coupled with the changed business model operated by Irish Rail and the growth of revenue generating traffic, rail freight should be considered as a key element in the future land transport options for goods traffic. p.8.

The largest rail freight movements originate in Co. Mayo and the opening of a new rail freight terminal within Dublin Port in July 2011 improved the economics of the rail services and increased the frequency of services. All of this is a major development towards reducing our carbon footprint and providing a safer mode of transport. It is estimated that the Ballina-Dublin Port service will save up to 5.5 million road kilometres every year and will reduce CO₂ emissions by as much as 2,750 tonnes⁷. This eases pressure on the road network and helps us reduce emissions from the transport sector.

International connectivity

Table 1.2 provides detail on the passenger throughput at each of the State airports and all other airports combined. The table should separate out figures for Ireland West Airport Knock as this constitutes the majority of the passenger throughput in this category. It is also clear in terms of the spatial location of each of the State airports that Ireland West Airport provides a critical international air access role not catered for by the three State airports. p.9

EU data measuring accessibility by air, using an index where EU 27 = 100, found that Dublin was the only region within Ireland above the EU average, measuring 135⁸. The Border region^[2] (60.2), West region^[3] (66.5) and Mid-West region^[4] (80.6) all recorded accessibility scores considerably below the EU average. These data have NOT been updated since the closure of Galway and Sligo airports, therefore the scores for the Border and West regions will be worse while the score for the Mid-West is likely to be much improved following the improved service offering there.

In the discussion there is no mention of the reasons for the dominance of Dublin Airport and it is implied that it is all market driven. Part of the reason that Dublin Airport is so dominant reflects supply issues and government policy. Dublin Airport provides the most comprehensive range of services and therefore is likely to attract most passengers. Government policy in reducing support for regional airports (such as Galway and Sligo Airports), combined with the significant improvement of the road network from many regions to Dublin Airport and an increasing number of private bus operators offering direct links to the airport has reinforced the relative attractiveness of Dublin Airport for international connectivity⁹.

The impact of Government policy is also evident at Shannon Airport with the reinstatement of the Aer Lingus Shannon-Heathrow service a few years ago and its subsequent success along with the

⁷ Transport providers' estimates. <http://www.iwt-irl.com/railfreight.html>

⁸ The reference year is 2006.

www.espon.eu/export/sites/default/Documents/Publications/TerritorialObservations/TrendsInAccessibility/accessibility_data.xls <http://www.wdc.ie/wp-content/uploads/WDC-PolicyBrief-no.3-Final.pdf>

^[2] Donegal, Sligo, Leitrim, Cavan, Monaghan and Louth

^[3] Galway, Mayo and Roscommon

^[4] Clare, Limerick and North Tipperary

⁹ See Background Paper Nine, Wider Economic Impact of Transport Investment: Case study analysis.

increased passenger numbers on other routes from Shannon. This demonstrates how effective Government policy can be in supporting international air access from the regions.

The WDC conducted a short survey of WDC supported companies (See Section 3 for details) and of those companies who cited air access issues, most related to road access to and service levels at Knock, Shannon and Galway airports.

Finally, apart from the need to support enterprise development in the regions, from a strategic perspective it is not wise to have an ever increasing share of passengers using one airport. There should be greater choice and range of services from other airports rather than ever increasing reliance on one international air access point, with the resulting strain on the land access routes to it. A greater choice of air services from other airports will help reduce peak traffic congestion on Dublin access routes.

1.3 Supply-side issues

In the final paragraph on supply side issues, the report discusses some of the consequences of improved network supply. It should also be recognised that substantial improvements in some areas have heightened the real and perceived disadvantages of lower accessibility in areas which do not have such a high quality transport infrastructure. p.10

Need to address commercial transport requirements

In considering the needs of the commercial sector, it is important to recognise that areas with relatively poorer accessibility will be disadvantaged in terms of enterprise development and competitiveness. p.11

Maximising value

An important part of maximising value is ‘sweating the assets’ of the existing transport network. p.11

2. Contribution of transport investment to economic growth

2.3 Outcomes of recent transport investment in Ireland

A significant number of the non-economic benefits of the M4/M6 seem to favour Dublin, for example access to Dublin airport and retail. While Galway and Dublin have benefited, smaller towns along the route may have suffered, for example easy access to larger retail centres negatively impacting on smaller town centres. p. 13.

In the discussion on the benefits from the M4/M6, the closure of Galway Airport and accessibility to the West for tourism, it is considered that ‘on balance, it has been positive for tourism on the West coast; most visitors will inevitably arrive via Dublin’. The WDC believes that one of the key factors supporting tourism development along the west coast (apart from product development) has been better international access through Ireland West Airport Knock and Shannon airports.

2.5 Land transport priorities for enterprise

There is a particularly strong focus on foreign direct investment and on the services sector (in the export sector). In the Western Region manufacturing remains very important and is also proportionately more important in the region than the rest of the state. Care needs to be taken that focus on services sector growth (especially in Dublin) does not lead to a relegation of the transport needs of manufacturing businesses. p.15

The only enterprise indicator used here is ‘... Dublin, Cork and Galway accounted for 82% of employment in new foreign firms for the period 2007 to 2011’. This is used to illustrate the concentration of these new foreign firms in the three largest cities. However only using this indicator is very limited when the purpose is to identify transport needs for enterprise. It excludes all Irish firms – which are more geographically dispersed – and all foreign firms established before 2007 – which are also more geographically dispersed.

While the data on new foreign firms may indicate some future trends, using this indicator alone focuses on a limited number / type of business and ignores Irish owned and long established foreign firms which tend to be more dispersed and which could be argued are more sustainable and embedded in the country. Their transport needs are equally important to those of recently established foreign firms, especially given current concerns in relation to the US government’s approach to US firms’ use of lower corporation tax economies.

Also, although the Steering Group report states that this indicator is taken from the ‘Land transport priorities for enterprise’ report prepared by Forfás, Enterprise Ireland and the IDA (Background Paper 18), it in fact does not appear in that report. The only somewhat comparable statistic that appears in the background report is ‘Between 2001 and 2011, Dublin, Cork, Limerick and Galway accounted for 64 per cent of employment in new agency supported companies and 80 per cent of employment in new foreign firms’ (p. 29). However this refers to a longer period 2001-2011 and also includes Limerick. The 64 per cent of employment in all new agency supported companies (which includes Irish owned) may be a more useful indicator if the desire is to provide some indication of the role of the larger cities.

The recognition of the need for improved connectivity to the northwest and Atlantic corridor is welcome. p.16

2.6 Transport investment and regional development

Overall the SFILT highlights more of the negative arguments rather than the positive arguments for the contribution of transport infrastructure to regional development. There is little discussion on the benefits but a lot on the conditionality and possible negative implications. (See also comments on Section 5.3 and Background Paper 7). While the WDC recognises that investment in transport infrastructure will not achieve regional growth by itself, quality transport infrastructure is still a necessary element of any strategy for regional growth. The need to have an integrated regional development policy does not mean that the absence of such a policy reduces the need for transport investment. In fact it is important that the benefits of investment in regional transport infrastructure are fully realised by ensuring that, alongside transport investments, there are broader regional policies to enable us to make the most of our transport assets. p. 16.

2.7 Discussion

Need for coherent regional development policies

WDC welcomes the recognition that there needs to be a more coherent regional policy. p. 17.

SECTION B: Considering the context

3. Assessing transport investment need in Ireland

3.2 Transport investment in context

The key observation which should inform the Framework is that rates of investment in land transport are lower in Ireland than elsewhere. The comparison with other EU countries on relative rail and road investment is useful. It illustrates the relatively low funding of rail in Ireland

(approximately 18% in Ireland), compared to most West European countries, where rail's share of land transport investment has been increasing in line with EU policy (currently 40%). p 19-21

3.3 Exchequer impacts and alternative funding models

It is noted for example that in 2012 nearly 3 times (2.85) the investment spend was raised in revenue. In 2008 the ratio was 1.5 times. Both the changing trends and a comparison with the ratios in other European countries would be useful. This context is important when considering additional taxation /financing measures. For many users, especially in rural Ireland, there is relatively inelastic demand and therefore the burden of extra taxation, especially with relatively little new investment is borne heavily by this group. p.22.

EU sources of funding. The WDC considers that the particularly strong focus on the Core Ten-T network compared to the Comprehensive network concentrates resources on this already well connected network. The WDC considers that it would be better to have more funding to integrate and connect more remote and peripheral areas along the comprehensive network. Many of these parts of the country are relatively inaccessible with some parts of the network still awaiting completion e.g. the Atlantic Road Corridor. p.23.

The ever-increasing share of revenue accounted for by fuel taxation is noted. This impacts more heavily on those without alternative transport modes, many of whom live and /or work in rural Ireland. p.23.

3.4 Funding requirements for a steady state network

The tone of the discussion of steady state requirements is framed very much in the current economic context (2013) and current capital allocations. This perspective means the discussion becomes very focussed on limiting the cost of providing transport services, especially to the Exchequer. The framework requires much more long-term strategic thinking. p.24

3.5 Addressing the steady state funding shortfall

There does not seem to be any discussion of efforts to change commuting/travel behaviour – patterns e.g. incentivising different working patterns, staggering school start/end times all of which could have a significant impact on travel demand. p. 25

In addressing the funding shortfall, 'the background of decreasing exchequer resources for transport' is cited as a given, with little explanation or rationale. For example it is not clear if this refers to the extreme constraints on public expenditure during the recession (when the background papers were being prepared) or whether it refers to the decreasing exchequer resources for transport compared to the very large level of public transport expenditure that occurred under both NDPs and Transport 21. Much of this expenditure can be seen coming from a very low base and was required to 'catch up' with our competitors. Background paper 12, (p2.).

Apart from these considerations, it should be noted that the country is now hopefully on a more sustainable growth path. It is not clear that for example transport expenditure should be impacted any more or less than any other sector.

Though 4 options are presented, it seems clear that all four will be followed. p. 26.

Option 2: Reduce size of state-funded road and rail network

This is clearly of considerable concern as the 'non strategic' roads are likely to be in more rural and peripheral areas. It is suggested that Local Authorities cover the costs of funding these from the Local Property Tax (LPT), with oversight by DTTaS but no national funding. This will have very significant implications for more rural Local Authorities who will already be receiving less in LPT and also will have a lot more of such roads. p.26.

The rail statistics suggest it is not performing as a transport mode. However it is not clear that this is the case. Comparison with costs and passenger levels in European countries would be very useful. The context of the continuing contraction of funding levels for the rail sector, fare increases and service reductions will impact on passenger demand.

The true costs of rail vis a vis the road network are not examined at all. The environmental benefits of rail use and the true economic costs of road based travel need to be assessed.

It would be important to sweat the rail asset in future, especially in the context of providing modal choice and its superior environmental record compared to the car. There is little consideration of the long-term benefits of rail (both passenger and freight) in the context of climate change and low carbon objectives.

Option 3: Reduce performance level required of certain assets

Again, it is likely that more rural and peripheral roads and the rail network will be where performance levels would be reduced. Rural areas would be further disadvantaged if both Option 2 and Option 3 are implemented with less funding and reduced requirements for performance levels for local and non-strategic regional roads. p.27.

4. Network use and travel demand

4.1 Existing demand patterns and future demand growth

The SFILT Group agreed to test two scenarios. It would have been useful to consider a third scenario, such as that proposed under the National Spatial Strategy (2002) which would consider greater regional balance. This scenario or an equivalent is likely to be the focus of the future Spatial Policy or National Planning Framework and associated Regional Plans. Assuming effective implementation, this will be a very likely scenario. p.31.

The WDC has some concerns over the conclusions drawn from the data. The SFILT starts by saying that the trips data shows the importance of our cities with Dublin city generating 24%, Cork, Galway and Limerick combined generating 8%. However this means that only 1 in 3 of all trips are from the four largest cities. This data clearly shows the importance of towns and especially rural areas as generators of trips (nearly half). There is much emphasis in the report on issues for cities but from the trips data, small settlements (under 2,500) and rural areas account for almost half of all trips and considerably more than the four largest cities combined. p.31.

The concerns and issues for these areas seem to get a lot less attention even though they generate the majority of trips. More balance is needed in considering the transport needs of the cities and those of smaller towns and rural areas. It is acknowledged that even under the urban consolidation scenario the number of rural trips remains high, but this is not seriously addressed in the report.

It is not clear whether there is any consideration of reduced peak demand arising from changed working patterns and more flexible working. p.32.

4.3 Other key influences on transport demand

See responses under Section 1.2 on Freight and International connectivity.

4.4 Managing current and future transport demand

It should be noted that one important explanation for low usage is poor public transport provision. p. 36.

Spatial planning

As well as planning for future development, there is a need to manage current and historic settlement patterns. People will continue to follow historic patterns and this should not be ignored

by assuming that land use planning can radically alter Ireland's historically dispersed settlement pattern, especially in the Western Region and other rural regions. p. 36.

5. Supporting other policy objectives

As noted earlier, for a long term framework these objectives should be treated as equally important objectives as economic growth. p.40.

5.1 Social inclusion

Transport in rural areas

There is little discussion on rural transport or the Rural Transport Programme which is surprising given the extent of rural trips (48%). There are numerous different models internationally and some pilots in Ireland on how to improve transport in rural areas. This seems a very limited discussion of rural transport given the detailed discussion of urban transport needs elsewhere and the number of trips that actually in urban areas and rural areas. There is also no mention that the 'non strategic' roads to be funded by LAs through the LPT (discussed in Chapter 4), which may receive less funding and thereby lower performance levels, are going to be concentrated in rural areas and impact heavily on rural residents. p. 40

5.2 Environmental, biodiversity and climate policy

Most of the focus is on emissions and not on energy consumption which is also likely to be of critical importance in the future.

5.3 Facilitating regional economic development

Transport and regional balance

Improving journey times is not about eliminating peripherality, rather is about reducing peripherality and improving accessibility. p. 42.

Investment in transport is often considered on a mode specific basis and while there may be reference to other modes on specific routes the cumulative effect on specific geographic routes and regions is often not considered. For example proposed investment in rail is now focused on those routes with better road access (motorways), to stay competitive, the cumulative effect of little funding for both road and rail on some routes (to the North West) is rarely evident from a broader, transport accessibility point of view.

Background paper Seven: Regional Development Impacts of Transport Infrastructure:

The role of transport investment for regional development seems to be downplayed from the beginning of the paper. For example in the opening paragraph there is reference to 'the perceived disadvantage due to peripherality'. It is widely accepted that distance to market and associated transport costs have real impacts on competitiveness. p.1

There is a reference to lobby groups when the intended meaning should be regions. p. 9.

There is no detail on the methodology used to compute the real public capital expenditure calculation. For example, it is not clear which elements of the transport infrastructure are included. It is also not clear if it is only Exchequer funded investment that is included. Figure 1.

Measuring benefit is also problematic. For example, how is 'benefit' defined? There is some concern over saying the Midlands was the region that 'benefited the most' from transport infrastructure investment. The non-economic impacts of the M4/M6 for example would not suggest that the Midlands benefited very much and actually indicate that the region may have suffered through improved access to Dublin and to a lesser extent Galway for retail etc. If the Midlands did in fact

'benefit' from transport investment more than any other region, it would be expected that it would have improved its' economic position. This has not been the case¹⁰.

The per capita spending depends on what projects are done in the reference period.

There is other research examining the extent to which different parts of the country have benefited, which should be cited. For example, T21 Mid-term review¹¹ notes the extent to which rural areas have experienced a relative lack of investment. It notes for example 'When [population] taken in conjunction with the data on spending it suggests that the greatest beneficiaries of the investment are those population centres located in the main interurban corridors, which includes Dublin, while the least favoured locations, even after allowing for population differences, are the deep rural areas not served by such corridors'.

A 2012 study by the NRA on the impact of national road investment 2006-2010 on the effective density of urban areas including their accessibility to employment' found that Sligo, Ballina/Castlebar, Wexford, Monaghan and Letterkenny had no or very small improvement. In contrast, Ennis, Kilkenny, Limerick, Galway and Mallow showed very significant improvement. The lack of investment north of Galway is clear from Map 1.p.6.

The purpose of Table 2 on driving distance is unclear. However when combined with journey times it shows that, Dublin to Cork (M8) 252km, estimated journey time is 2hours and 46 minutes¹². Dublin to Letterkenny (M1 and A5) 240.8km, estimated journey time is 3 hours 13 minutes. This illustrates the longer journey times due to the inferior road network even though Letterkenny is closer to Dublin than Cork. p.8.

The discussion on lower taxes leading to higher returns on investment is not very clear and the mechanism is not explained. p. 9 .

Transport and tourism, Transport and the agri-food industry

Transport investment needs to support all economic sectors, the economic structure of regional and rural areas is not confined to tourism and agri-food. Growth in these sectors has been particularly strong in the last few years and further growth is anticipated but there are other sectors which are very strong in regional and rural areas. The green economy, engineering, knowledge services, the creative industries all have growth potential and important transport needs.

5.4 Transport and health

There is a need to note the importance of transport in accessing health services. Good transport, in terms of journey times on the road network and better public transport services are needed to access health services generally and to hospitals in particular. Health services are increasingly concentrated in centres of excellence, especially for critical illness such as cancer and various specialist services. In particular in the Western Region better transport access is needed to serve the entire catchment of Galway University Hospital, serving the entire West and North West regions.

¹⁰ In 2011 the Midlands had the lowest GVA per person of any region in Ireland (€17,777) this was only 55% of the state average which is the regions lowest share in the period 2000-2011. Midlands contribution to national GVA in 2002 was 3.6%, 2006 4.8%, 2011 3.4%. Even if it is considered the region's benefit is as a commuter location for Dublin, the Midlands had the second lowest disposable income per person in 2011.

¹¹ T21 Midterm Review, CILT (Ireland) November 2010, p5

¹² Journey times from aa route planner.

6. Identifying priorities and principles

There is a lot of overlap here with previous chapters. Therefore comment will only be made on any new points and if there is an observation made elsewhere in the document this is referenced accordingly.

6.1 Discussion

Meeting increasing demand: An ongoing challenge

While ‘transport policy has consistently had the stated aim of promoting modal shift away from the car’, the fact that transport funding, especially over the last twenty years has been heavily weighted in favour of the car and the development of the motorway network, means that that policy was unlikely to succeed. Promoting modal shift is not just about promoting alternatives, it first requires the provision of alternatives. p.46.

Transport investment is critical to economic growth

See response in relation to p. 1 of SFILT report. p.46, 47.

The WDC recognises that transport alone will not achieve regional growth, but it is still a necessary element of a strategy for regional growth. It seems to be implied that because it is not the full solution it is not important. A quality transport network is not a sufficient factor but it is necessary to support regional competitiveness. p.47.

Appropriate scale of investment

See response in relation to p26 of SFILT (Option 2) p.49

Assessing travel demand

While the last paragraph recognises that smaller settlements and rural areas will remain substantial trip generators, this is not dealt with in any detail. This reflects the imbalance in how the urban congestion issues and the travel issues of other areas are dealt with throughout the SFILT. p.50.

On the discussion on possible charging, it says that ‘where people have no or inadequate access to more sustainable transport, cost effective alternatives will need to be provided in the event of price mechanisms being implemented.’ It is not clear if rural areas and smaller settlements are included in this, but should be. p.51

Integration with other policy objectives

The WDC welcomes the recognition of the needs of rural areas and the importance of environmental considerations. However the justification for rural transport investment seems to be based on objectives in tourism and agri-food rather than recognising the broader economic structure of rural areas and the broader range of transport objectives; access to services, non work trips etc. etc. p.51

The importance of transport in relation to the environment is noted, but it is important also to plan and shift thinking to consider the long term future (2050) in as far as possible (future proof investments). p51.

Implementation challenges

The WDC agrees that transport investment priorities and ‘Regional Transport Strategies’ should be aligned with the planned new National Planning Framework and the new regional strategies, though it is likely that it will be 2016 before these are prepared. These regional transport strategies need to be framed in the context of serving the entire range of policy objectives, supporting the transport needs of rural and urban users, access to services as well as employment and the promotion of economic growth across all regions. The transport strategies should be integrated in terms of transport modes (land, public transport, air, sea, walking etc), as well as ensuring coherence with

neighbouring region's transport strategies so there is consistency along transport corridors. If these are to be developed by the NTA as suggested, it would be important that the Regional Assemblies should be integrally involved in developing them, especially in the context of the regional economic and spatial strategies. There is also need for a stronger evidence base at local and regional levels to inform these strategies as well as extensive regional consultation. p.52

6.2 Priorities for future investment

Principles generally come first and frame the priorities (in the SFILT the priorities are set out first). Principles should be broader and reflect the long-term overall objectives for land transport. Once these have been set, priorities which are in line with the principles can be listed. Priorities should be less broad and more focused on areas of need. p53-55.

The WDC has set out what it considers should be the key principles framing the SFILT. These are set out at the start of this Submission.

Priority 1: Achieve steady state maintenance

See comment in relation to p27 of SFILT report. p. 53.

Importance of a strategic and longer-term planning approach

The WDC agrees on the need for a strategic and longer-term approach to the Framework. However while acknowledging the long lead-in times for delivery the current document does not seem to recognise that the transport choices made now will impact heavily on our transport behaviours in 30+ years. In particular there is a need to plan for carbon reduction and price increases arising from fossil fuel shortages. p.54.

6.3 Principles for land transport investment

While there is reference to a more sustainable transport network, there is a need for an explicit recognition of a probable move to the low carbon economy and how this must be an integrated element of any future planning and any strategy and framework. P. 55

7. Implementation

7.1 Size of the funding envelope

See response under 7.3 below. p56.

7.2 Decisions on the appropriate scale of the network

There are a lot of implications here for rural and peripheral areas and counties and funding / performance of non-strategic roads, as well as the rail network which have been outlined earlier in the Submission. p.57.

Clarification is needed on 'appropriate scale of the road network to be funded by central government'. If roads are of national importance they should be funded nationally. p.57

7.3 Integration of land use and transport planning

See comment in relation to p52 SFILT. p.57.

7.4 Key role of appraisal

In reviewing the Department's transport appraisal guidance (TAG) the full range of impacts should be considered. A strategic framework for investment must have some means of ensuring that wider economic benefits are included, even where such appraisal must of necessity be qualitative. It is also important to remember that investment in transport has effects which are not purely economic and which may provide social inclusion, health, community and other less tangible non market benefits. A means of incorporating such benefits needs to be developed so that it can form part of the appraisal of investment in land transport. p.59.

3. Results of Survey of Western Investment Fund Portfolio

The WDC has operated the Western Investment Fund since 2001.¹³ The Fund provides risk capital to indigenous, export focused companies based in the Western Region. To inform this Submission the WDC sent a questionnaire to companies in its Fund portfolio to identify their main transport issues at present and their transport priorities for the future.

The questions were sent to 32 enterprises and 23 responded (72% response rate). Responses were received from companies based in five different counties. Enterprises from Galway city (8) and Galway county (5) were the largest group with responses from Donegal (3), Mayo (2), Sligo (2) and Leitrim (1). The survey related to all transport and not just land transport. The main results were:

- Three enterprises indicated no transport issues, two noted this was due to them being software companies.
 - The largest number of issues/priorities identified related to road infrastructure, followed by air services, freight and rail.
 - The two issues mentioned most often (and by companies outside of Galway as well as those based there) were:
 - Completion of the M17/M18 Gort-Tuam motorway (9)
 - Galway ring road / access to the west of the city and county (7).
- The difficulties associated with poor access on either side of Galway city is highlighted in the following response: ‘Last week a truck driver coming to our factory in Spiddal from Cork city reached the outskirts of Galway city in 2hrs 40 minutes (distance 195 kilometres) and from there it took him a further 1 hour 20 minutes to get to Spiddal (distance 25 kilometres)’.
- The other transport issues mentioned by more than one enterprise were:
 - North-south connections along the Atlantic Road Corridor north of Tuam (4)
 - Freight and fuel costs for those in more remote locations (4)
 - Re-starting flights from Galway airport (4)
 - Access to overnight/next day freight services from the region (3)
 - Traffic flow management during road works and peak commuting times (3)
 - Flights to EU cities from Knock and Shannon airports (2)
 - Greater international flight connections including to US cities (2)
 - Cargo handling services at Knock airport (2)
 - Galway harbour/port cargo services (2)

Other transport issues were raised by only one enterprise however in some instances this was due to the geographic distribution of the responses. In relation to land transport, the quality of the N4 and N5 access from Sligo/Leitrim and Mayo to Dublin was raised, as was the weakness of diagonal road connections across Ireland linking the West/North-West with the South East. Poor quality national secondary and regional roads in Mayo and Donegal were also mentioned.

Rail issues raised included rail freight, improved services on the Ballina/Westport-Dublin line, light rail for Galway and the western rail corridor.

Improved public transport in Galway city as well as rural public transport provision was also raised as a priority.

¹³ <http://www.wdc.ie/wdc-investment-fund/>

Appendix 1. Road priorities for the Western Region

As the SFILT will influence the next government capital programme expected to run from 2017 to 2021, the WDC wishes to highlight a number of national and regional road projects which are of significant importance to the region's future economic and social development.

Galway urban mobility: Galway city experiences substantial urban congestion and as economic activity increases in the recovery this is likely to be exacerbated. In addition to improvements in public transport provision, there is an urgent need for a **Galway outer bypass / ring road**. Access to the west of the city and county, where there is substantial economic activity, is severely hampered by congestion with added costs for enterprises and individuals.

Linking the North-West with Dublin: Access for the north-west to/from Dublin is a critical priority. Improved road access from Dublin to the gateways of Sligo and Letterkenny is necessary to enhance their attractiveness as business locations and their wider regional economic role. The enterprise development agencies (Background Paper 18) also identify improving connectivity to the north-west as an enterprise priority for the SFILT.

Research by the NRA found that Sligo was the only Gateway in Ireland with no improvement in its 'accessibility to employment' indicator as a result of the substantial investments made in national road infrastructure between 2006 and 2010, with Letterkenny having one of the smallest improvements across all Gateways and Hubs.¹⁴ The remaining section of the **N4** to Sligo (which will also benefit county Leitrim) and the **A5** to Letterkenny (through Northern Ireland) are urgent short to medium term road investment priorities.

Atlantic Road Corridor: The primary focus of national road investment through the major inter-urban programme was on linking centres with Dublin. However greater attention now needs to be placed on inter-urban linkages between regional centres, and particularly the Atlantic Road Corridor (Letterkenny-Sligo-Galway-Limerick-Cork-Waterford). The sections already completed are concentrated in the southern part of the corridor and there were considerable delays in the commencement of the **M18/M17** Tuam-Gort project which will not be completed for some years.

Sections of the **N17** north of county Galway, such as the Tubbercurry bypass and north of Sligo town to the Donegal border, require urgent improvement to enhance linkages between Sligo, Letterkenny and Galway as well as to Ireland West Airport at Knock. This is required to improve the region's international competitiveness and has been identified as an enterprise priority by the enterprise development agencies.

Linking Mayo/Roscommon with Dublin: The **N5** remains the poorest national primary road in the country. Access to north Roscommon and county Mayo is hindered by the poor quality of this road and this has been expressed as a major concern for manufacturing enterprises located in the area. The section of the N5 from the recently opened Ballaghaderreen by-pass through to Strokestown causes considerable bottlenecks and delays as much of its length lacks a hard shoulder and there are limited over-taking opportunities. The project currently in planning along this route should be identified as a short term road priority.

Inter-regional linkages: Considerable lengths of several national secondary roads which link county towns across the Western Region are in very poor condition. This causes substantial time costs and delays for businesses and individuals across the region. A number of these roads should be identified as short to medium term strategic priorities. These include:

- N61 from Athlone to Roscommon to Boyle to join the N4 to Sligo

¹⁴ Table 5, NRA 'Impact of improvements in the road network on the accessibility and economic potential of counties, urban areas, gateways and hubs' 2012

- N84 from Galway to Castlebar
- N63 from Galway to Roscommon town
- N60 from Roscommon town to Castlebar
- N56/N59/N67 coastal route, which forms part of the Wild Atlantic Way