

**Department of Transport, Tourism and Sport
Public Consultation on a Review of Sustainable Mobility Policy**



Western Development Commission

**Submission to Public Consultation
on
Public Consultation on a Review of
Sustainable Mobility Policy**

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 a Review of Sustainable Mobility Policy issued by the Department of Transport, Tourism & Sport.

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 DRCD². 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 Review of Sustainable Mobility Policy and associated background papers and the opportunity to submit its insights into the policy formulation process. The WDC sets out its response to each background paper focusing on areas of WDC expertise.

The Western Region (the seven counties under the WDC remit) is very rural. Using the CSO definition 64.7% in of the population live outside of towns of 1,500 or more. Using the definition in [Ireland 2040 the National Planning Framework](#), 80% of people in Western Region live outside of towns of 10,000. Thus WDC work has a particular focus on the needs of, and opportunities for, more rural and peripheral areas.

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 our Policy Analysts Deirdre Frost, or Dr Helen McHenry at policyanalysis@wdc.ie.

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

² Department of Rural and Community Development.

Paper 2 Active Travel –

- 2.1 Given the trends highlighted in Section 5, what should the focus be in terms of infrastructure delivery?*
- 2.2 How can we best deliver an integrated package of focused behavioural change measures and infrastructure in order to achieve change?*
- 2.3 Is greater consideration needed in future active travel policy to increase walking as a transport mode? If so, what measures should be considered?*
- 2.4 What additional measures can be introduced to encourage multi-modal journeys?*

As there is overlap between comments on these questions they are considered together, structured broadly in line with the questions as set out.

As noted in the Background paper, Active Travel brings an important range of benefits both for the traveller and for the wider community. In discussion of Active travel and increasing participation, the emphasis is often on densely populated urban areas or on intermediate areas. As the Western Region under the WDC remit is predominantly rural (see introduction) the focus of the comments in this section is on issues for the Region and in particular issues for rural areas.

Active travel tends to be less popular in thinly populated areas and in intermediate urban settlements. There are a number of reasons for this, including the need to travel longer distances to employment or services, a lack of walking and cycling facilities, motorised transport travelling at higher average speeds giving rise to concerns about personal safety, greater exposure to wind and rain, and lack of artificial lighting meaning that many journeys are difficult in the hours of darkness. Finally, a lack of congestion and predictable travel times in rural and intermediate urban areas also reduces the incentive to walk or cycle.

Despite these issues, it is important that Active Travel options are available and promoted in rural and intermediate areas so that the proportion of active journeys can be increased to the benefit of both the individual travellers and the wider community.

The focus of infrastructure delivery should be on increasing walking and cycling not just in urban or congested areas but in rural and smaller or less congested urban areas. Even where the demand does not currently appear to exist the facilities should be put in place. The design of infrastructure for walking and cycling should be good. It should not increase the distance a pedestrian must travel and cycle lanes should be consistent, on road or on pavements (not continually switching between them) and they should not stop abruptly or deliver the cyclist into the middle of a traffic junction. Short stretches of cycle way are not useful unless they are bypassing a particular travel hazard. In rural areas they should not be less than 500m as otherwise the delay caused by stopping and starting for the cyclist going on and off the cycle lane may mean that they are not used.

Normalising walking and cycling as viable travel options in rural areas is important. They shouldn't be considered unusual, risky or the preserve of a small minority. This normalisation will of course occur as participation increases, but also as the infrastructure for active travel is increased and the options are more visible and safer.

The case studies in the consultation document indicate the potential of good infrastructure, and highlight the opportunities for encouraging more active travel. In rural areas where roads are narrow and road surfaces can be poor, walking and cycling can be unattractive options. Improvements in infrastructure can help them become part of the package of travel options for people making journey to work, school or to services.

Some of the design of roads and crossings in towns (including smaller rural towns) mitigates against walking, with poor junction design making it hard to cross the road. Similarly shopping facilities usually prioritise car routes and do not provide short direct options for walkers, instead expecting them often to take a long way around. Any planning for new retail or other services should prioritise access for walking and cycling. While in many situations people have no option but to drive to their local town, there should be an effort to encourage walking between shops or services within the town, leaving the car parked in one spot for the duration of the visit.

Active travel is particularly important in the context of multi modal journeys. In rural areas the number of people who walk or cycle to public transport (bus or train) should be targeted for increase. Infrastructure is important for this.

This would include provision of footpaths around train stations and linking towns to train stations, and safe places to wait in the vicinity of bus connection options or stopping places. The provision of physical bus stops with timetables and information will also help to increase the visibility of public transport and allow people to consider the possibility of walking or cycling to the stop. Alongside this there should be consideration given to the provision of simple bus shelters at bus stops which would improve safety for those waiting. Such rural bus shelters are visible in many parts of Europe (they are usually of different design to urban shelters) providing shelter and a place to sit while waiting. These could also be used by those waiting for a lift/car share.

To encourage cycling as part of multi modal journeys, it is important that secure, dry cycle parking is available, which is of good design so that bicycles may be locked without damage. In areas where there is significant commuting by public transport to urban centres there should be large cycle park facilities made available for free to incentivise cycling over car travel to the local station.

Park and ride facilities should also provide cycle parking and shelter for those waiting for the bus. This would make it a more attractive option.

Paper 3 Climate Change Challenge

The WDC is currently engaged in a project on the transition to a low carbon economy in rural areas (under Action 160 in the Climate Action Plan) and transport is one of the elements under consideration.

Rural people are more reliant on car based transport, they have less available public transport and tend to travel greater distances. Rural dwellers' transport and travel patterns need to be central to our climate action planning. There must be detailed consideration of transport issues for smaller settlements and rural areas.

The three pronged policy and personal approach of 'Avoid, Shift, Improve' (ASI) framework, a hierarchy that emphasises reducing journeys in the first place, achieving modal shift, and improving mode efficiencies³ and should be used for rural transport planning.

Addressing transport emissions is a key element of the [Climate Action Plan](#) where there is specific focus on the need to address rural issues under the transport heading (e.g. Action 94 to review public and sustainable transport policy and to publish a [public consultation on public/sustainable transport policy](#), including rural transport). This recognises that rural transport needs are different. Under the Plan, Action 100 also addresses the need for a vision for low carbon rural transport and commits to develop a new rural transport strategy and to conduct a comprehensive assessment of rural travel demand, and methodologies for determining it.

Addressing transport and travel in rural regions is complex. In order to understand what needs to be done to reduce emissions from rural travel, we need to know what our travel patterns actually are. The WDC has collated available journey data which is discussed in detail in this blog post⁴ [Rural Journeys and Travel: what do we know about the Western Region?](#). Some of the issues associated with travel and reasons for travel are discussed in detail in this post⁵ [Why do we travel? Distance to rural services and the need for rural journeys](#). As the work is on going there will be other relevant analysis published in the coming months. Knowing the current situation means that we can better understand what we need to do to make the transition possible and ways to make it happen.

We need to understand the reasons that transport in rural areas is different and why reducing emission in rural areas may be difficult, these reasons relate to population, population density, distance to services and to employment and amenities. Understanding patterns of population growth and decline and population density, provide the background for much of the discussion of transport and journeys. It is important to recognise the characteristics of these before considering why we travel.

The rural nature of the Western Region has implications for how we reduce transport emissions, but the reasons we travel are also very important, both in terms of options for reducing journey numbers and types, and the distances and nature of the journeys. The

³ See more discussion in the NESC paper [Advancing the Low-Carbon Transition in Irish Transport](#)

⁴ The link is at <https://wdcinsights.wordpress.com/2019/12/19/rural-journeys-and-travel-what-do-we-know-about-the-western-region/>

⁵ <https://wdcinsights.wordpress.com/2019/12/20/why-do-we-travel-distance-to-rural-services-and-the-need-for-rural-journeys>

reasons for journeys are considered, along with the factors influencing the journeys made in rural areas.

Travelling for work and business are clearly important, but most journeys are made to reach services of varying kinds. People living in rural areas tend to be at a greater distance from services than their urban counterparts and so the journeys made tend to be longer and more car based. Greater distance to services tends to reduce options for travel and in particular, given the lack of public transport and the distance to public transport services, increases reliance on car travel in rural areas⁶.

3.1 Which sustainable mobility emissions mitigation measures, not currently employed in Ireland, should be considered for implementation?

The mixing of biofuels with fossil fuels for transport under the Biofuels Obligation Scheme has significantly reduced emissions from transport vehicles. While increases in the level of biofuels in petrol and diesel are planned there should be a more rapid, clearly signalled move to the higher E10 and B7 standards.

3.2 Are there any measures identified as “potential measures” in Table 7.1 (page 57) that you would like to see implemented?

The most significant potential measures which should be implemented or further promoted are teleworking and car sharing initiatives. Teleworking reduces the numbers of journeys made quite significantly, as well as having considerable benefits such as improved quality of life as a result of reduced time spent commuting, and it also reduces congestion at peak times. The WDC examined some of these issues in 2017 in its Policy Brief “[e-Working in the Western Region A Review of the Evidence](#)”⁷ and in a short paper on [Home based working](#)⁸. An expansion of car sharing initiatives is also important. There is significant potential for car sharing and the co-ordination of it both locally and countrywide through specific apps (see [Bla Bla Car](#)⁹ for example, which is particularly popular in France (read more about it [here](#)¹⁰) and through social media (see [this example from Clare](#)¹¹). Finally, the term ‘Park and ride’ should include parking at train stations or places to catch bus services. These need to be improved in many locations. Lack of safe, available parking can be a disincentive to longer public transport journeys and so should receive more investment. The service provider may need to receive targeted grant to allow for this.

3.4 How should mitigation measures be prioritised (e.g. on basis of: least cost, carbon abatement potential, disruptive effects, co-benefit potential etc.)?

⁶ This is discussed in more detail, with more data analysis in this blogpost <https://wdcinsights.wordpress.com/2019/12/20/why-do-we-travel-distance-to-rural-services-and-the-need-for-rural-journeys/>

⁷ https://www.wdc.ie/wp-content/uploads/WDC_Policy-Briefing-no-7.pdf

⁸ <https://www.wdc.ie/wp-content/uploads/WDC-Insights-Home-Based-Working-July-2017.pdf>

⁹ <https://www.blablacar.com/>

¹⁰ <https://en.wikipedia.org/wiki/BlaBlaCar>

¹¹ https://www.facebook.com/Clare-carpooling-429550491224530/?_tn=HHH-R

The Avoid-Shift-Improve principle should be the key basis for prioritisation of mitigation measures. In general avoidance of use will have the biggest beneficial impacts. Following that principle, as suggested in the consultation document an pursuing a low carbon vision for transport will not only contribute to achieving Ireland's climate change commitments but can also deliver wider benefits. These include improved energy security, economic opportunities from renewable and indigenous fuels and significant benefits in the areas of health, lifestyle, travel costs, local environment and air quality. These are all important benefits and unless they are considered or valued as benefits a least cost approach will not capture them.

Paper 4 Congestion

As Paper 4 shows, the costs of congestion are significant and varied, impacting on efficiency, economics and societal and individual wellbeing. Within the Western Region the larger towns and Galway city are particularly affected. It is important that congestion is significantly reduced, both to reduce the economic and social costs being incurred, but also to ensure the Region and its growth centres can deliver on the ambitious regional growth targets set out in Project Ireland 2040.

4.1 What are the opportunities and challenges around reducing traffic congestion in our cities and other urban areas and how can sustainable mobility respond to these?

Within the Western Region, congestion in Galway city is of most concern.

- The Galway Transport Strategy has identified various sustainable mobility measures which need to be expedited. Funding from national Government needs to be made available to ensure speedy delivery.
- A key element of sustainable mobility is public transport. Apart from Dublin which has a suburban light rail system, all other cities rely on public transport by bus and therefore the quality of the road network is critical. Galway city is one of the most congested regional cities and is also the only regional city without a bypass similar to Cork (Lee Tunnel), Limerick (Shannon tunnel) and Waterford (City bypass - Southlink N25).
- The N6 Galway City Ring Road needs to be delivered in order to support more potential bus routes. In addition to removing this traffic from the inner-city network, the bypass will provide for additional entry and exit points to different parts of the city which will relieve congestion on the existing limited road network.
- There needs to be an expansion of commuter rail services on the existing Athenry-Oranmore-Galway city route. This will relieve congestion and help promote more sustainable transport (walking and cycling) within Galway city. Investment is needed to double track this line, provide passing bays in the short term and procure additional carriages.
- Regional towns will need support and investment in devising and activating sustainable mobility town plans. Support from the expertise available within the NTA and Local authorities should be made available.

4.2 Should additional demand management measures be considered, alongside supply focused measures, to address urban congestion – for example congestion charging/road pricing?

Additional demand management measures such as the active promotion of e-working/remote working should be undertaken. Demand management measures which support alternative patterns that are favourable to transport users are more likely to induce behavioural change than those such as congestion charges which penalise travel patterns without necessarily providing alternatives.

The Government have recently published a paper on Remote Work in Ireland which was a deliverable of Future Jobs Ireland 2019, see [here](#) which places a focus on fostering participation in the labour force through flexible working solutions.

The WDC have been active in the area of remote working (previously termed e-work and telework) for many years, researching the practice, as well as operating an e-work policy for over two decades. The WDC has published various papers including a recent blogpost which identifies the most recent evidence. The most recent data suggest that 18% of workers declared they worked from home, see the blogpost [here](#) for more detail.

Examining e-Working in rural Ireland, a report commissioned by Vodafone , found that nearly one in four broadband users in rural Ireland use the internet at home in relation to work. More detail is available in the WDC Policy Briefing *e-Working in the Western Region* in March 2017, see [here](#).

There is no doubt that the practice is widespread and on the increase. While it has been somewhat hidden from official statistics, the quality of the data is beginning to improve.

Another aspect and impetus for increased e-working or remote working is where the worker works from a hub rather than home. The success of initiatives variously called e-working spaces/ co-working spaces/ hubs also suggests e-working is on the increase. Some working spaces are funded by Department of Business, Enterprise and Innovation and some by the Department of Rural and Community Development. The hubs are variously classed as innovation, enterprise or community hubs, and many are focussed on start-ups and incubation spaces as well as providing e-working spaces for individual employees.

The Western Development Commission is coordinating an initiative with the Department of Community and Rural Development (DCRD) called the Atlantic Economic Corridor (AEC) Enterprise Hubs project. This three year project aims to create an interconnected community network from the 101 hubs identified in the AEC region (the region from Donegal to Kerry) along the Western seaboard.

Paper 5 Greener Buses – Alternative fuel options for the urban bus fleet

It is regretted that the focus of this consultation paper focussed only on the urban bus fleet that includes Dublin Bus, Bus Éireann and Go-Ahead bus fleets that are currently in operation in Dublin, Cork, Galway, Limerick and Waterford. This is very narrow, and while there are differences a broader exploration of fuelling options for interurban fleets would have been useful.

5.1 What challenges and issues need to be considered in relation to transitioning the PSO urban bus fleet to alternative fuels and technologies?

The consultation paper shows that Galway, which has significant congestion problems, only has 36 buses available to operate services. If there is to be a serious focus on urban transport, this fleet needs to be increased and more frequent services, on new routes, with easy links between services, need to be put in place. Any future PSO support for increasing the size of urban fleets should stipulate the use of alternative fuels and technologies.

5.2 Based on the additional investment costs associated with alternatively fuelled vehicles and their associated infrastructure, should bus fare structures be modified?

No, given that increasing use of public transport should be a policy for reducing emissions from private car use, and reducing congestion in cities and towns, any additional costs from fuel switching should be supported by the climate action fund or other exchequer fund. Altering fare structures (which presumably means increasing fares, rather than decreasing them) will encourage a move away from public transport. In other countries attractive fare structures (such as very cheap annual travel cards) have been an important means of increasing public transport use. The focus in considering fares should not just be on covering the increased cost of fuelling.

Paper 6 – Land Use Planning and Transport Planning

2.2 Why integration of land use and transport planning is important

The WDC agrees that the integration of land use and planning is important in generating more sustainable mobility. It is important to understand that many people migrate to urban congested centres especially Dublin, to seek jobs (land use) and have to endure long commute times. If more employment was located in regional centres then it is likely many would have shorter commute times, with much less investment and funding required to ease congested networks in the Greater Dublin Area for example.

3.3 Population trends and legacy planning issues

One of the important contributory factors to the recent and current pattern of development is the decisions which focused on transport investment to and from the capital with relatively minimal investment in other inter-city routes. The WDC considers that some of the current congestion or ‘over development’ of Dublin is in part a legacy issue relating to the patterns of land use and transport planning over the last three to four decades. The priority given to improve the radial road links (and rail links) between the provincial cities and Dublin ensured that Dublin was the most accessible city while at the same time there were relatively very poor intraregional links between each of the other cities, stifling development within and between and the other regions.

4. Overview of Project Ireland 2040

The WDC welcomes the regional population and employment targets as set out in Ireland 2040-Our Plan. These targets are ambitious and will need to be supported by investment in order to ensure that the targets can be realised. However, the Plan suggests that investment in connectivity first without urban consolidation measures will likely worsen the current trends towards sprawl and that only when the core areas in key cities and urban areas have been mobilised will enhanced accessibility between key urban centres become a priority.

This undermines the vision of Ireland 2040-Our Plan. In addition, the planned timing of road investment projects along the Atlantic Economic Corridor (most will occur in the later stages of the Plan) suggest a lack of priority, though ‘Enhanced regional accessibility’ is Strategic Objective No. 2 and the Atlantic Economic Corridor is a key element of this. It also suggests a lack of understanding as to the role of infrastructure generally, and transport connectivity in particular, in enabling development and the consequences of the underinvestment which has so negatively impacted the development of the north west.

When considering priorities for development or areas in which sustainable development opportunities are available, it is important to consider how the location of housing and employment along public transport corridors, such as intercity rail routes, allows significant possibilities. It is important to consider the rail network as an asset with huge potential to enable more sustainable development in many regions.

The longer term role of rail, serving a population that is growing, and with an increasing need to reduce carbon emissions, positions rail as an increasingly important travel mode. The Dublin-Galway line has high patronage levels (second after Dublin-Cork) and improved service levels, journey times and electrification should all be considered as part of long-term planning.

- A key issue for the development of all areas is transport accessibility, without this, increasing further densities especially for employment will be a challenge. The development of services, both new and expansion of services will need to be made sometimes in the context of latent demand, as it takes time for people to respond to and take up new service provision.
- Ensuring Effective Integration of Land-Use and Transport Planning.
The preparation of the Local Transport Plans is very welcome. Local Transport Plans should have a clear focus on sustainable transport in the Plan area, including pleasant, accessible, safe options for walking and cycling. There should also be integration with transport modes serving the wider hinterland. The preparation of LTPs for regional towns should also consider and develop plans for travel between each of these urban centres.
- The development of regional growth centres as planned under Project Ireland 2040 will require the investment in an accessible, efficient and low carbon public transport network. Links between these towns and their respective hinterlands will be needed. The development of this transport system should also ensure effective interchanging and links to airport and port infrastructure as well as to other important centres. Developing good local transport networks will support the growth of these designated centres as envisaged under Ireland 2040.

Within the WDC Western Region, Sligo should be an important transport hub providing links to the Region and opportunities for change of mode or transport connections. It is also important that, as a key growth centre, public transport services into and out of the town are well developed and available in both early morning and late evening.

- Land use planning should encourage new (and expanding) retail developments to locate close to public transport corridors, to enable sustainable travel and the use of public transport modes.
- While intercity rail services can be a sustainable alternative for longer distance trips, the rail service can also be an important transport mode for shorter distance commuting, such as the current route from Athenry and Oranmore to Galway city. There may be potential for further expansion of commuting services along the existing intercity lines, serving Galway, Athlone, Sligo and other centres given their planned population and employment growth.
- Similar to the rail network, when considering the Bus Network, there can be a tendency to focus on connectivity between regional centres, as these are the most populous. Some of these routes are very well served, especially considering both public and private services. For example, at present the Galway City to Dublin bus service is one of the most well-served in the country. When discussing the need to invest in bus services, it would be more appropriate to highlight bus services which

are currently under-developed and under-serviced. Bus routes which are currently unattractive to private operators should be a key investment priority.

- There is an urgent need to provide new interchange facilities and enhanced bus waiting facilities together with enhanced passenger information, utilising smart technology in appropriate circumstances. Even relatively small investments in smaller centres are needed and if made can help support increased patronage levels. For example, given the many interconnections at Charlestown (e.g. Bus 22 Dublin-Ballina and Bus 64 Derry-Galway), a bus shelter at Charlestown should be provided.

6.3 Commitment to extend NTA's remit to other cities

It would be preferable if the statutory requirement for mutual consistency between the regional spatial and economic strategy and the relevant transport strategy should apply to the NWRA and Southern regions, just as it currently applies in the GDA. While this is one of the National Policy Objectives of *Project Ireland 2040*, the timelines are not clear. It is important that the remit is extended as soon as possible as this will ensure consistency and effective implementation of the development of transport services.

8.3 Key growth enablers for the cities

Galway city

The growth enablers for Galway city should include reference to the rail network which includes important and growing levels of patronage on the Athenry-Oranmore-Galway route. Investment in the existing rail network which has high levels of patronage can be one of the most efficient ways of increasing sustainable travel. As Paper 6 notes, rail can be preferable to bus, where more buses and drivers are needed to carry the same number of passengers as by rail, which could result in higher operating costs for bus compared to rail. Bus travel will also add to an already congested road network.

There needs to be an expansion of services on this route as well as to centres such as Ballinasloe and Athlone as well as Dublin. Double tracking and/or passing bays need to be delivered to help increase frequency of services.

The preparation of PLUTO 2040 needs to support attainment of the Regional population and employment targets set out in *Project Ireland 2040*. PLUTO should also ensure full consideration of the transport needs of the population residing outside the key centres in the region and ensure better and more sustainable transport modes.

9. Sustainable mobility elements of the NDP

9.2 Recent investment in sustainable mobility

As noted above there is a need for further investment in train and bus station and interchange facilities.

1.3 NDP Commitments

The WDC welcomes the forthcoming findings of the Rail Review process and the indication that there will be no planned closure of any rail lines. There should be investment to improve service levels to promote take-up on all services. The WDC also

considers that any planned investment to improve line speeds and journeys times (including electrification) should include those routes serving the Western Region as a priority.

9.6 Regional and rural investment

Considering the need to promote greater sustainable transport and the need to improve service provision in regional and rural transport there should be increased capital funding. As section 9.6 notes, 'the main emphasis for investment in these areas is operational funding for PSO services in rural areas and Local Link services'. This does not indicate a sufficient degree of investment to improve services.

Paper 7 Regulation of Public Transport

7.1 Are there further opportunities to improve the institutional arrangements for the regulation of the public transport sector?

The WDC considers that the remit of the National Transport Authority (NTA) which confers additional responsibilities within the GDA should not be confined to the GDA but should be extended to the entire country. The particular additional responsibilities allow the NTA to more effectively deliver on the transport needs of the GDA and this overall, comprehensive role is needed throughout the country. In particular the responsibilities outlined below will allow for a more strategic and integrated delivery of services as well as providing a better sense of the gaps in service provision.

- Strategic planning of transport
- Development of an integrated, accessible public transport network
- The provision of transport infrastructure
- Effective management of traffic and transport demand

Given the role of the NTA in delivering the Rural Transport programme, the investment programme in regional cities, the accessibility programme, and other transport programmes, the NTA already have a significant role and understanding of transport issues outside the GDA. What is needed is the capacity to deliver overall strategic direction so as to enhance and integrate services across the country and beyond the GDA.

The WDC welcomes the close engagement between the NTA and Local Authorities in the preparation of Regional Spatial and Economic Strategies. The role of transport is important in delivering the Regional Strategies and Ireland NPF 2040.

The delivery of the various (now 15) TCUs needs to be constantly revisited to ensure they are delivering for all their local populations. Travel demand varies and population growth and decline is a constant.

Section 3. State-funded bus and rail services

The background document notes that the majority of bus and rail services are PSO routes. These are 'financially unviable services which are provided as a public good'. In this discussion it would be useful to note that this is not unusual, that most public transport services arose Europe are in part subvented by the Exchequer and especially those outside the denser urban centres. It would also be useful to observe that the provision as a public good is also to provide wider economic benefits which are often not quantified but are no doubt significant, for example bus and rail services relieving congestion for the private car user and the important role these transport services play in enabling the efficient functioning of regional and intra-regional labour markets. Therefore the objectives also include economic benefits as well as social benefits and this should be stated.

The data depicted in Figure 3.2 (p.14) provide insights into the trends across service type. Of particular interest to the WDC is that there is an increase in Local link passengers as well as Bus Eireann PSO passenger journeys. Passenger numbers on Galway city services and stage carriage services (services linking satellite towns and villages to main towns & cities) are both up, indicating continuing and increasing demand for such services. (possibly in line with economic and employment growth). It will be important that continuing investment is made to improve these services and increase take-up further.

7.3 How can public transport stakeholders – users, staff, providers and regulators – work more collaboratively in the delivery of public transport in Ireland including ensuring a voice for the passenger?

Demand responsive transport

This demand needs to be responded to and there needs to be structures for ongoing engagement to ascertain if there is unmet demand.

There are some international examples worth looking at in considering how to capture latent and unmet demand, the use of smart technology in capturing and collating user demand and potential user demand. For example in Scotland, the Scottish Transport Appraisal Guidance (STAG) ensures bottom up consultation, where the community is pivotal in articulating the transport options needed (STAG Part 1). See presentation on Scottish system from ITF-OECD Connecting Remote Communities Roundtable event in Ottawa in 2019 see [here](#).

Section 3.6 Rural Transport Programme (Local Link)

It is welcome that passenger numbers under the Rural Transport programme have increased over the last three years, indicating better service delivery and previously unmet demand.

The report notes that as part of the re-tendering process of 1,035 contracted services, as of September 2019, 90% of services have been retendered. Is there more information available on the outstanding 10%? Have or will services be reduced?

7.4 Are there international best practice examples around the regulation of public transport that could be applied in an Irish context?

The WDC believes any learnings from other countries is the provision of transport services to more regional, rural areas with lower population densities should be brought to bear. Countries with regions which are more sparsely populated such as northern Sweden, Finland and Norway may have useful models of best practice. Best practice across the EU generally should also be considered, but it will also be clear that Ireland is somewhat unusual in its relative size of population and geographic settlement compared to other EU countries which have more devolved governance structures. Appropriate examples may well be more rural regions within larger countries such as rural regions within France, Germany and Spain.

There are some other international examples with looking at, in particular Scotland, see presentation from ITF-OECD Connecting Remote Communities Roundtable event in Ottawa in 2019, available [here](#).

Section 4 Commercial Bus Services

It would be useful to have some sub national – regional/county or other breakdown of the extent of commercial bus service provision as well as an indication of trends. For example, how much does the overall national figure of 13% vary across regions and to what extent is that changing over time? The WDC is aware of some commercial operators providing many useful services across the Western Region, but better data on the level of service provision and passenger numbers is needed. This information will help inform better service provision.

Section 7 International Services and Brexit

There is significant cross border travel between Ireland and Northern Ireland. Census 2016 results show that nearly 10,000 people crossed the border for work and school (9,336 people). Workers made up three quarters, 7,037 of commuters, up 10% on Census 2011. Donegal accounted for the largest number of cross border commuters, with 5,600 commuters, 76 per cent of whom travelled to Co. Derry. The extent to which these avail of public transport is not clear but it will be imperative to ensure that there is no impact on cross border public transport.

Section 8 Passenger Rights, Section 9 Rail Regulation

Passenger rights and regulation should be applied and enforced across all services irrespective of where they are delivered. Services with lower patronage levels should not (whether inadvertently or not) have differences in regulation or application of passenger rights. For example online train fare bookings were not available on the Ennis-Athenry line for a considerable length of time after the introduction of services.

New services or services with lower patronage level need to be made more attractive to help support uptake and change travel behaviour.

Section 10 Emerging Regulatory Issues

Mobility as a Service (MaaS)/Shared Mobility

App-enabled on demand services, ride sharing platforms and other such services can be particularly relevant and useful in more regional and rural locations.

Widespread broadband availability under the National Broadband Plan will ensure that the technical means will be available.

Intelligent Transport systems.

The WDC supports innovation in Intelligent Transport Systems in line with EU and national regulations and guidelines.

Within the Western Region there are a couple of significant companies engaged in research and development of Connected and Autonomous Vehicles. The WDC supports their work, some of which can provide insights into delivery of services within regional and rural areas. The WDC agrees that any pilot testing should have public safety as its priority.

Paper 8 – Public Transport in Rural Ireland

2. What is meant by rural transport?

The Western Region; those seven counties¹² under the remit of the Western Region, is particularly rural. While 37% of Ireland's population lived in settlements of fewer than 1,500 people or in individual houses in rural area, the proportion for the Western Region is significantly greater; 64.7%. The provision of rural transport is therefore of particular interest to the WDC.

How we define rural and rural transport is important. The CSO definition of rural relates to those areas outside settlements of 1,500 or more. These are areas of very dispersed population. Using the definition in [Ireland 2040 the National Planning Framework](#), rural areas are outside towns of 10,000. These rural areas therefore include some of the significant towns in the Western Region which have different transport patterns and needs to the more sparsely populated rural areas. It is important that these differences are recognised in planning for rural transport and that one approach is not assumed to cover rural issues.

2.5 Transport Disadvantage in Rural Areas, 2.6 Social & economic exclusion in rural areas

Section 2, and section 2.6 in particular notes the social exclusion in rural areas, some of which can be attributed to and exacerbated by transport disadvantage. As Section 2.6 and the 2016 Irish Rural Link Report note, this transport disadvantage can reduce people's ability to access employment and as such this is a significant economic impact. Transport disadvantage can give rise to economic and social exclusion. Poor transport access can limit the economic potential of individuals, communities and areas and its impacts are broader than social exclusion.

Most journeys are made to reach services of varying kinds. People living in rural areas tend to be at a greater distance from services than their urban counterparts and so the journeys made tend to be longer and more car based and of course those without access to a car are particularly disadvantaged. Greater distance to services tends to reduce options for travel and in particular, given the lack of public transport and the distance to public transport services, increases reliance on car travel in rural areas¹³.

This higher average distance to services for rural people means that rural dwellers are travelling further and for longer periods are more likely to need a car, which is the only way to access most of these services. The National Household Travel Survey¹⁴ compared the proportion living within 15 minutes' walk of key services (e.g. shop, post office, chemist, pub or restaurant, or a bus stop) in rural areas with the national picture and found that found

¹² Counties Donegal, Sligo, Leitrim, Roscommon, Mayo, Galway and Clare.

¹³ Discussed more here <https://wdcinsights.wordpress.com/2019/12/20/why-do-we-travel-distance-to-rural-services-and-the-need-for-rural-journeys/>

¹⁴ https://www.nationaltransport.ie/wp-content/uploads/2019/01/National_Household_Travel_Survey_2017_Report_-_December_2018.pdf

that 40% of all rural respondents did not live within 15 minutes of *any* of these services. Other services such as banking, libraries and leisure services like swimming pools may be used less often but have much higher average distances, again increasing the need for motorised transport (most likely a car).

The distance to hospital is greatest, and while some outreach services are provided, many people will need to attend appointments and on going treatment services in these hospitals. Some transport services are available but many will, where possible or necessary, use private transport of their own or with a friend, relative or volunteer.

The need for car travel is partly a function of the distances to be travelled but it also relates to difficulty accessing public transport. The average distance to a train station and a public bus stop (which in all Western Region counties is less than the average distance to a train) is 2.6km in the state. It is greater than 2km in five Western Region counties. For most of these counties, these distances are greater than most people are likely to be able or wish to walk, especially given the hazards of walking on many rural roads, lack of footpaths and the probability that many of the journeys in winter would not be in daylight.

3. Existing Policy Context

3.4 Project Ireland 2040

Much is made of the commitment to transport investment in rural areas, however it is acknowledged that *while there is capital investment for public transport in rural communities under the NDP, it recognises that the main emphasis for investment in these areas is operational funding for Public Service Obligation (PSO) services in rural areas and Local Link services* (page 9).

This suggests that the funding commitment had not improved significantly.

Furthermore, on page 13, the 2nd bullet under Section 3 Key Points notes; *Project Ireland 2040* places a major focus on rural areas with an emphasis on balanced regional development. Enhanced regional accessibility and strengthened rural economies and communities are amongst its key goals. While this commitment is welcome, in reality the actual capital investment provided for enhanced regional accessibility will only be provided towards the end of the 10 year Capital Investment plan, if not after that 10 year period. If it was a priority there would be a commitment to an earlier spend.

It is also worth noting that while capital investment for roads and particularly regional and local roads will be important in helping to improve rural transport possibilities, it is the public transport service levels on these roads that will be the determinant of improved transport services for rural users.

It should be noted that as well as considering public transport, walking and cycling as means of reducing pollution, we need to be planning for major switch to EVs by 2040.

6. Local link – Integration with other transport services

6.2 Integration with Local Authorities and Regional Assemblies

The WDC has previously noted in this submission (Chp 6) the need for the remit of the NTA to be extended to the whole country.

Bus infrastructure in rural areas.

The rollout of bus stops and shelters in rural and regional areas is welcome. It would be important to include the private bus routes and stops as part of the criteria in considering the deployment of shelters. Even relatively small investments in smaller centres are needed and if made can help support increased patronage levels. For example, given the many interconnections at Charlestown (e.g. Bus 22 Dublin-Ballina and Bus 64 Derry-Galway), a bus shelter at Charlestown should be provided.

Electric Vehicles

Funding needs to continue to be made available for the range of Local Link services as these are a key element in the transport services in rural Ireland. Provision could be made to support the purchase of electric vehicles where possible, for both provision under both the Direct Award system and otherwise.

7. Population patterns and travel trends in rural areas.

Addressing transport and travel in rural regions is complex. In order to understand what needs to be done to reduce emissions from rural travel, we need to know what our travel patterns actually are. We have collated available journey data which is discussed in detail in this blog post¹⁵ [Rural Journeys and Travel: what do we know about the Western Region?](https://wdcinsights.wordpress.com/2019/12/19/rural-journeys-and-travel-what-do-we-know-about-the-western-region/). Some of the issues associated with travel and reasons for travel are discussed in detail in this post¹⁶ [Why do we travel? Distance to rural services and the need for rural journeys](https://wdcinsights.wordpress.com/2019/12/20/why-do-we-travel-distance-to-rural-services-and-the-need-for-rural-journeys).

9. International Case-Studies

There are some international examples worth looking at, in particular from the ITF-OECD Connecting Remote Communities Roundtable event in Ottawa in September 2019. This Roundtable explores policies to ensure adequate access to services for residents in sparsely populated regions. It aims to provide insights into how different countries address the connectivity challenge for remote and rural communities. It outlines methods to assess the level of connectivity across transport modes and also through other means, such as internet-based services. Finally, approaches to measuring the value for money of different policy options are considered. There are four country case studies; Canada, Chile, Finland and Greece and the presentations are available at the [link](#) here.

The Scotland case-study has particular relevance to Ireland. Some key points include;

- Optimal connectivity levels are dependent on the social and economic objectives.
- Many transport services are to provide access to services such as health and educations as well as employment.

¹⁵ The link is at <https://wdcinsights.wordpress.com/2019/12/19/rural-journeys-and-travel-what-do-we-know-about-the-western-region/>

¹⁶ <https://wdcinsights.wordpress.com/2019/12/20/why-do-we-travel-distance-to-rural-services-and-the-need-for-rural-journeys>

- Some transport services are termed 'lifeline' services, for example those communities with only one mode of transport. (e.g. islands with a ferry service)

Transport appraisal in Scotland is set out in the Scottish Transport Appraisal Guidance (STAG)

There are two parts to the process. Part 1 and Part 2.

STAG Part 1. Where a range of proposals are appraised against local transport planning objectives, STAG criteria, established policy directives, feasibility, affordability and acceptability. Appraisal is based on how it delivers on local project objectives and these are determined by the local community. The objectives of the transport service provide the case for the government intervention/investment. There can be a range of proposals which do not necessarily have to pass the economic (cost/benefit) analysis.

STAG Part 2: Appraisal of the short list to get preferred option. This appraisal is against local transport planning objectives, STAG criteria, cost to government and risk and uncertainty.

The conference also provided some insights from Greece and the provision on rural transport there. As well as the use of multicriteria analysis measuring Performance and quality, there was also a discussion of concepts such as Connectivity index, Transport Potential Index and Connectivity Adequacy index. A report on the conference proceedings is forthcoming.

8.1 What are the opportunities and challenges in providing public transport in rural areas?

- Existing public transport like school bus services and other transport services (health) should be open to all rural dwellers, making the most of the existing services.
- Where a service exists bus stops, signage and information should be available including covered bus shelters (discussed more in the Active travel section of this submission)
- Bike parking stops which is secure and dry should be provided at rail stations and key bus (discussed more in the Active travel section of this submission)
- An Information app on availability/ timing would be useful. Sometimes it can be difficult to find information about an existing service or predict when it might arrive.
- If a phone service is used to provide information about the transport service or to allow for demand response this needs to be staffed daily ideally from 7am to 7pm. If you cannot rely on being able to contact the service to book or check timing the service will not be used to its potential.

8.2 How can we continue to ensure that the transport needs of rural communities are met in the context of the Project Ireland 2040 objective to regenerate rural Ireland by promoting environmentally sustainable growth patterns?

Most people will continue to live in current pattern so it is important to plan services for where people live now. Encouraging employment where people are living will reduce the need for travel. Home working and hub working should form part of this.

8.3 Are there international best practice examples around the provision of public transport in rural areas that could be applied in an Irish context?

These are discussed above.

Paper 9 Statistics and Trends

Data gaps, funding, non exchequer funding, current & capital funding

9.1 What data gaps and limitations exist in relation to the current statistics on public transport?

Commercial Bus Services

As noted in the comments on Paper 7, it would be useful to have some sub national – regional/county or other breakdown of the extent of commercial bus service provision as well as an indication of trends. For example, how much does the overall national figure of 13% vary across regions and to what extent is that changing over time? The WDC is aware of some commercial operators providing many useful services across the Western Region, but better data on the level of service provision and passenger numbers is needed. This information will help inform better service provision.

There seems to be a shortage of data on public transport provided by private operators. These account for a significant proportion of scheduled services between cities and towns in the Western Region but there is little data on passenger numbers, frequency etc. This can sometimes lead to underestimation of the use of public transport not provided by Bus Éireann or Irish Rail.

Multi Modal Journeys

Many journeys are multi modal, and yet there is very little information on such journeys with the main mode often being the only information gathered. Better data on multi modal journeys would allow for infrastructure and services to be planned taking it into account and also , with better understanding of the roles of different modes in different journey types, the more sustainable modes can be encouraged as elements of a journey.

9.2 Given the competing demands for Exchequer funding across Government, are we prioritising the most appropriate areas of sustainable mobility for support?

There needs to be more focus on developing sustainable mobility in rural areas. Much of the focus is on urban areas and we understand this given the density of population and shorter distances travelled as well as congestion being an important driver.

There has long been a focus on sustainable travel in Dublin, but less focus on other cities (e.g. Galway) and other urban centres (such as Sligo and Ennis). Likewise in small towns it is not prioritised or is included as an add on. Solutions may not be well designed or not attractive to users or may not be integrated so that they are not practical for users. Finding out what works in smaller urban centres and making good investments is important.

There is a dearth of sustainable travel options and solutions available for rural areas, and if we are to reduce the carbon intensity of rural travel there needs to be a clear focus on finding solutions in rural areas, piloting infrastructural investments in rural areas and small towns and trying novel approaches to encouraging sustainable travel. We need to find out what works in rural areas in relation to lift sharing, public transport use and active travel so potential solutions need to be encouraged and then tested and learned from.