



Border, Midland & Western
Regional Assembly
Shaping the Region



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**Submission to the
Department of Transport:
2020 Vision: Sustainable Travel and
Transport Public Consultation**

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1. Introduction

The Border, Midland and Western (BMW) Regional Assembly welcomes this opportunity to make a submission to the Department of Transport's consultation on a 2020 Vision for Sustainable Travel and Transport for Ireland. This paper sets our response to the issues raised in the consultation paper as well as identifying key policy deliverables that will enable this vision to be realised.

The BMW Regional Assembly was established in 1999 to give effect to the division of the country into two regions for Structural Funds purposes. For the 2007-13 funding period, the BMW Region no longer qualifies for objective 1 funding (having a GDP per capita above 75% of the EU average) and qualifies instead as a phasing-in region for objective 2 funding under the Regional Competitiveness and Employment objective. The BMW Region covers 13¹ counties which represents 47% of the landmass of Ireland, 27% of the population and 19% of GDP.

The main roles of the BMW Assembly are to:

- Manage the BMW Regional Operational Programmes 2000-2006 and 2007-2013;
- Monitor the impact of all EU and Irish exchequer-funded programmes in the BMW Region;
- Promote the co-ordination of the provision of Public Services in the Region; and
- Ensure that national policies take regional issues into account.

2. Economic Context & Implications for Ireland

2.1 Economic Growth and Spatial Settlement Patterns

The spatial settlement patterns that have emerged in Ireland as a result of recent rapid economic growth are unsustainable, whereby excessive concentration of economic activity has occurred in the east. The associated settlement patterns and population concentration that have emerged have led to:

- Massive growth in the use and ownership of private cars for transport and as a consequence increasing levels greenhouse gas emissions;
- Longer commuting distances/times; and
- Greater levels of congestion leading to reduced efficiency and increased operating costs for businesses.

This rapid suburban expansion has occurred at the expense of functional integrity. Ultimately both the quality of life of residents and the efficiency of businesses in the Eastern Region suffer as a result of this over concentration of growth, which in turn has a profound impact upon the country as a whole.

A transport system with patterns of travel that is sustainable requires the implementation of **balanced spatial planning**, whereby settlement patterns are determined by a framework of spatial foresight planning and focused public investment that builds the capacity of regional centres, integrated with a transport

¹ BMW Region: Border (Cavan, Donegal, Leitrim, Louth, Monaghan & Sligo)
Midland (Laois, Longford, Offaly & Westmeath)
West (Galway, Mayo & Roscommon)

system that delivers less motorised journeys, shorter travel distances and utilises more sustainable transport modes.

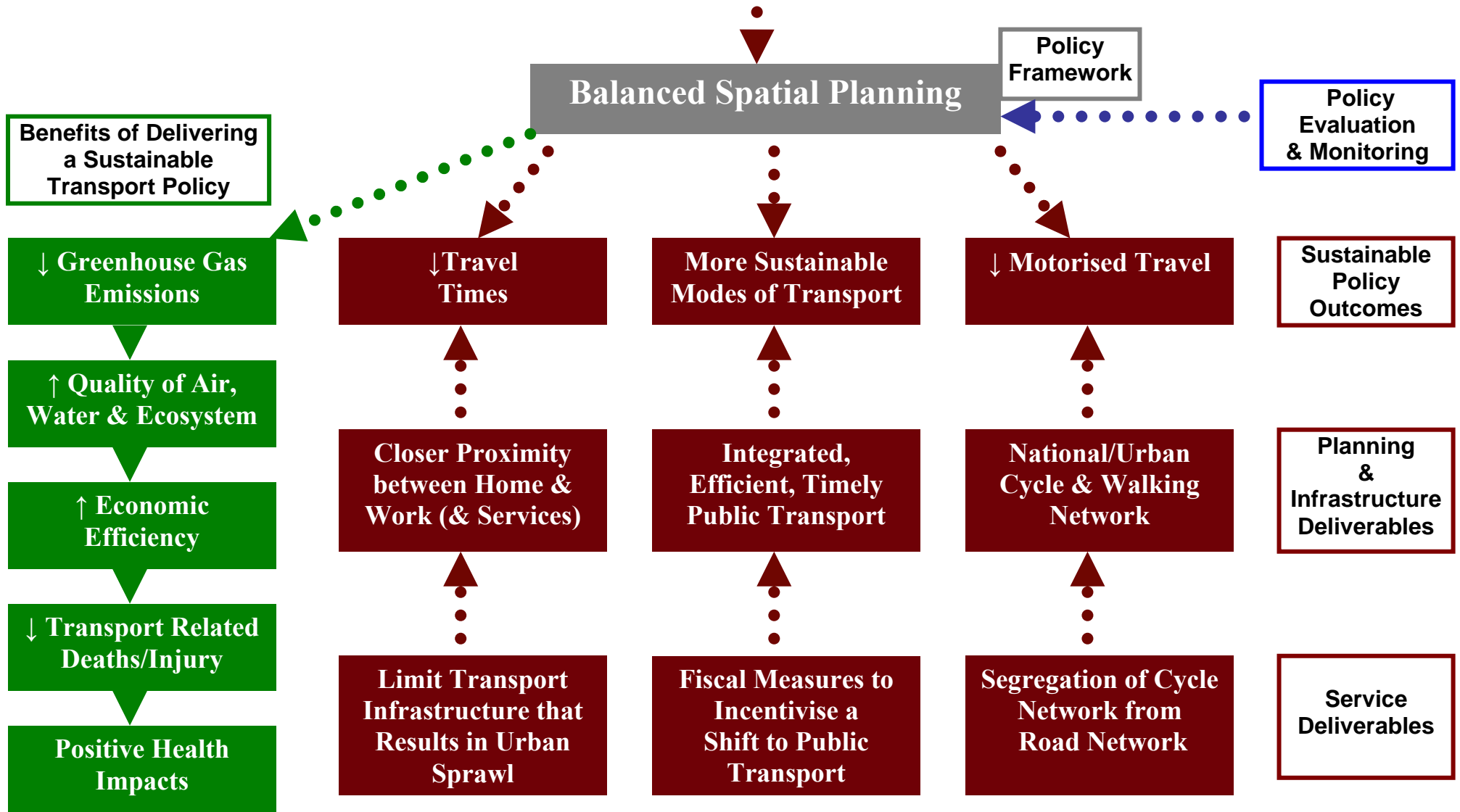
The persisting environmentally damaging urban sprawl and development patterns stemming from car dependence have led to the increasing isolation of residents in outlying suburbs, and an escalating in the distances travelled to carry out daily tasks. A poorly integrated transport system is also reducing employment opportunities and access to essential urban services. This policy seeks to increase the use of sustainable modes, and would see a reduction in air and noise pollution, curb development sprawl and see the enhancement of public space in our cities and regional centres.

A sustainable transportation system is one that²:

- ⇒ Allows the basic access needs of individuals and societies to be met safely and in a manner consistent with human and ecosystem health, and with equity within and between generations;
- ⇒ Is affordable, operates efficiently, offers choice of transport mode, and supports a vibrant economy; and
- ⇒ Limits emissions and waste within the planet's ability to absorb them, minimizes consumption of non-renewable resources, limits consumption of renewable resources to the sustainable yield level, reuses and recycles its components, and minimizes the use of land and the production of noise.

² ECMT (2004). *Assessment and Decision Making for Sustainable Transport*, European Conference of Ministers of Transportation, Organization of Economic Coordination and Development

Sustainable Travel & Transport in Ireland




2.2 Provision of Transport Infrastructure and Economic Competitiveness

Ireland's competitiveness is the key to future economic growth and national competitiveness and how it functions in competitive regional locations. Central to this is the provision of an effective, efficient, sustainable and reliable transport system. The wide disparities in the provision of transportation infrastructure that currently persists between regions in Ireland are not conducive to either national or regional competitiveness. It is important to bear in mind that the competitiveness of the state as a whole is comprised of the competitive strengths of its constituent regions and compromised by their weaknesses. To be competitive in regional locations, enterprises must also have access to infrastructural facilities that are at least on a par with their competitors, this is not only necessary for regions to be in a position to attract inward investment and but also to facilitate the growth of indigenous enterprises.

2.3 Balanced Spatial Planning and the Promotion of Modal Shift

Balanced spatial planning is necessary in order to influence individuals' travel behaviour. The practice of effective, balanced spatial planning can promote genuine modal shift to public transport. This can be achieved by considering and capturing the needs of a community in advance putting infrastructure in place. To promote real modal shift, public transport, cycling and walking have to be more convenient and flexible alternative than private transport usage.

In March 2007, the UK Department of Transport produced a noteworthy document, *Manual for Streets*³, this policy document concentrated on the provision of residential streets with particular emphasis on sustainability. It proposes implementing a hierarchy in the design process⁴:

<p>Consider First</p>  <p>Consider Last</p>	1. Pedestrians
	2. Cyclists
	3. Public Transport Use
	4. Specialist Service Vehicles (e.g. emergency services, waste disposal)
	5. Other Motor Traffic

It is not intended that this would necessarily be rigidly applied but rather that pedestrian usage should, in first instance, be considered followed by consideration for other users in the order given. This helps ensure that planning and design will serve all of its users in a balanced way.

The reality recognised worldwide is that building roads leads to increases in road usage, through the phenomenon known as induced traffic. In Ireland, roads schemes are being designed, assessed and approved on the assumption that the level of traffic will not change if the road is improved. **Balanced spatial planning complemented by the implementation of a design hierarchy should form the framework for Ireland's sustainable travel and transport policy.**

³ Department of Transport (UK). 2007. Manual for Streets.
Available at <http://www.dft.gov.uk/pgr/sustainable/manforstreets/>

⁴ Ibid p.28

2.4 Policy Evaluation, Development of Appropriate Sustainable Indicators

Monitoring and evaluating any public policy is fundamental to its success. Given the relatively recent discipline of delivery public policy with an overarching strategic aim of sustainability, greater consideration is required. Sustainable economics is built upon recognising the difference between increased quantity (growth) and increased quality (development), it therefore focuses on social welfare outcomes rather the growth of material wealth. Given these fundamentals the evaluation of sustainable policy initiatives need to not only evaluate hard (growth) indicators, such as the actual shift in modal share achieved, but it also needs to consider the softer social welfare (development) effects.

The choice of indicators for evaluation can significantly influence results. If sustainable transportation is defined only in terms of resource depletion and climate change risks, more efficient and alternative fuel vehicles may be considered the best solutions. But these strategies fail to help achieve other planning objectives such as congestion reduction, facility cost savings, safety, improved mobility for non-drivers, or more efficient land development; in fact, by reducing vehicle operating costs, it tends to increase these problems⁵. It is therefore important for everybody involved in sustainable transportation planning to understand the assumptions and perspectives used to select and define sustainable transportation indicators⁶. **The establishment of sustainable transport indicators therefore requires careful consideration and coordinated with a range of other policies, including education, health, environment and land use planning.**

2.5 Setting Regional Policy Targets

In order for there to be real impact on regional development in Ireland the Government must establish clear measurable regional targets for across all national policy strategies, sustainable transport should be no different. The initiatives undertaken to meet regional sustainable targets should prioritise investment in the lesser developed regions with a commitment to invest higher per capita sums in these regions. **Clear measurable regional sustainable transport targets should be set and there should also be a real commitment of resources for these targets.**

3. Public Transport

3.1 Low Mass Transit Patronage in the BMW Region

Emanating from the rural character of the BMW Region, it has a widely dispersed population and settlement pattern, commuting in the region generally involves relatively longer distances, in many instances along poorer quality non-national roads. Moreover, such travel is mainly conducted by means of private transport because of a lack of satisfactory regional and local public transport systems. The BMW Region's reliance on private transportation as the primary means of transport thus leads to higher emission levels and a greater dependency on imported fossil fuels. This also

⁵ Litman, Todd (2004). Efficient Vehicles Versus Efficient Transportation: Comparing Emission Reduction Strategies, VTPI

⁶ Victoria Transport Policy Institute (2008). Well Measured: Developing Indicators for Comprehensive Sustainable Transport Planning. p.5.

makes the BMW Region more vulnerable than other regions to rises in oil prices and fiscal incentives which penalises the use of private transport.

Public transport in the BMW Region remains relatively underdeveloped. Strategic investment in public transport is critical to develop and facilitate intra and inter regional access. The National Spatial Strategy reiterates national policy of giving increased focus to public transport within cities and town and more rural areas. **The consultation document is heavily focused upon resolving congestion in the GDA region, while this is very necessary it should not dominate the current focus of public transport policy in Ireland – rural transport considerations need to be prioritised in parallel with urban transport needs.**

3.2 Public Transport to Lead Transition to Sustainable Fuels

Government policy should not only be focused on reducing car journeys, but should include specific targets and strategies for the development of the bio-fuels sector. Such schemes are already in operation by Cork and Galway City Councils. These schemes should be further developed in partnership with Sustainable Energy Ireland and mainstreamed to all local authority areas. **One simple mechanism could be to make it mandatory for all public service vehicles to be run on green energy.**

3.3 Integration of Public Transport Systems

Ticketing should be quick and easy to use across operators and different public transport modes, in order to encourage usage. This however is currently this is not the case in Ireland, the ticketing system is fragmented and lacking in co-ordination. While integrating ticketing is on-track for the GDA, this is not the case nationally. **The introduction of integrated ticketing on all public transport services needs to take place concurrently to progress in the GDA.**

3.4 Bus Transport

Given the dispersed nature of the population in the BMW Region the provision of a high frequency and consumer centred bus service remains crucial for the region. The on-going and prospective improvements in the BMW Region's road network provide further opportunities to develop a greater inter-urban service within the region.

Whilst the overall coverage of towns and villages in the BMW Region is relatively comprehensive, the timing and pricing structures act as a constraint to increased usage. The service for commuters is relatively poor and there are few buses leaving sufficiently early to bring people to their place of work/education. Street furniture (bus shelters/bus stops etc) needs to be accessible, safe, secure and well lit. The lack of bus shelters in many rural towns also acts as a deterrent to the uptake of bus transport. This consultation document only discusses the GDA urban bus network, there is a need to broaden the assessment to include the challenges facing other urban and inter-urban transportation systems in Ireland. **Existing services can be enhanced by improving pricing and timing structures, integrating rural and urban bus timetables, providing bus shelters at rural bus stops - all of these initiatives would act as an incentive to commuters.**

3.4.1 Quality Bus Corridors (QBCs)

In order for public transport to offer a faster, reliable and alternative form of transport, it is essential that QBCs are put in place in all cities and Gateway towns. QBCs could

be utilised by taxis as well as buses but they could also be used as part of a broader policy to encourage car pooling. We therefore welcome the commitment in Transport 21 to the introduction of QBCs to Galway City. However no timescale is provided for their delivery. Consideration should also be given to the feasibility of QBCs in other Gateway towns such as Sligo, Dundalk, Letterkenny, Tullamore, Mullingar and Athlone should also be considered. **The timeframe for the implementation of a QBC for Galway city should be prioritised and delivery of QBCs to other Gateway towns should be examined.**

3.4.2 Rural Transport Programme

We welcome the mainstream and increased funding for the Rural Transport Initiative (now the Rural Transport Programme (RTP)). In rural areas, where there is not sufficient critical mass to sustain a regular bus service the RTP has made an important impact in terms of increasing the levels of independence and reducing isolation for the mostly excluded residents who use its services⁷. **Continued development and expansion of the RTP and linking services with mainstream routes is central to tackling the issue of rural isolation particularly among older people.**

3.5 Rail Policy

Rail is a more energy efficient method of transport than road-based alternatives, has a better safety record and has the potential to reduce congestion costs.

*More Energy Efficient*⁸

- ⇒ Rail is still twice as energy efficient as road, even after fuel use has been included for rail line haul, road pick-up and delivery from rail terminals, manufacture of transport equipment and construction of roads and railway lines;
- ⇒ Urban rail is twice as energy efficient as buses and 2.5 times more energy efficient than cars; and
- ⇒ Rail freight uses only one-third of the fuel required by road transport per tonne of freight hauled and produces less than one-third of the greenhouse gas emissions.

*Potential Reduction in Congestion Costs*⁹

- ⇒ One suburban train carrying 1000 people keeps 800 cars off the road, with significant savings in fuel use, greenhouse gas emissions and road congestion.

Strategic investment in the provision of rail services along with road infrastructure can significantly reduce the geographic marginalisation of the West of Ireland. Rail as an alternative needs to be attractive, affordable, rapid, reliable and comfortable **In parallel to this adequate provision of park and ride facilities, regular shuttle buses linked to the most appropriate station and the development of cycle tracks and footpaths to the nearest or most convenient station will encourage the use of rail as an alternative means of transport.**

⁷ Area Development Management Limited (2004). External Evaluation of the Rural Transport Initiative.

⁸ Nature Conservation Council New South Wales, Annual Conference 2002: Sustainable Transport Policy p.6.

⁹ Ibid.

3.5.1 Lessons from the Strategic Rail Review

The Strategic Rail Review provided an example of a lack of regard to the NSS. This review is written ‘with the broad philosophy of the NSS in mind’¹⁰ rather than adhering to any precise recommendations of the NSS. Disappointingly, this was a further example of a Government-funded policy review which did not fully incorporate the objectives of balanced regional development. The public consultation document that is currently under review continues this premise by placing an over-emphasis on the transport needs of the GDA, to the detriment of other regions. **This review should take into accounts the objectives of balanced regional develop and not over focus on the GDA demands.**

3.5.2 Western Rail Corridor (WRC)

The commitment to reopen the WRC¹¹ from Ennis to Claremorris and to preserve the alignment from Claremorris to Colloney is welcomed by the Assembly. The WRC will bring enormous advantages to the BMW Region in terms of stimulating economic activity, tourism potential, relieve traffic problems on the heavily congested N17 and N18 routes and provide important rail linkages to the airports of Shannon, Galway and Knock. The rollout of the WRC will therefore have substantial positive environmental impacts for Ireland. In the context of a National Spatial Strategy the WRC will be very valuable as it would link Gateways and Hubs along the route, and connect airports to public transport.

Having considered the significant benefits to the BMW Region of the WRC we are disappointed by the length of time required for the re-opening of the Athenry to Tuam Section (2011) and the Tuam to Claremorris section (2014). **There are few obstacles to working on existing disused lines compared to a new line and therefore these projects should be proceeding sooner.**

3.5.3 Linking Regional Centres: Athlone-Mullingar

Along with the development of the Western Rail Corridor there are elements of the national rail network, no longer in use but still intact, which could link Hubs and Gateways throughout the country. There are opportunities to re-open connections linking regional centres and possibilities to investigate the potential for commuter rail services to serve the regional Gateways and Hubs which are located on the existing rail network.

There is also a strong case for the re-opening of the Athlone-Mullingar lines on social, sustainability, transport planning and spatial balance grounds. This route should also be given a greater priority, especially if the Midland Triangle is to function effectively as a Gateway. There should also be a link to Tullamore, with commuter services between the three towns. The Athlone-Mullingar route would not only serve to connect these two midland towns, but would also provide an important national linkage, by integrating the two main westerly rail lines this would allow trains from Galway and Mayo to depart from and arrive in Connolly station, thus freeing up the lines out of Heuston Station.

¹⁰ Department of Transport (2003). Strategic Rail Review. p.20.

¹¹ “Western Rail Corridor” refers to the possible rail passenger and freight route from Sligo or Ballina through to Limerick with onward connections to the south-west and the port of Rosslare.

This route was identified as a potentially important project in the Strategic Rail Review and in the Regional Planning Guidelines for the Midland region. This was not included as a Transport 21 project and should be addressed. **The opening of the Athlone-Mullingar line should be pursued as a priority.**

3.5.4 Linking the North-West

The North-West region of Ireland is not served by rail and this has a considerable impact on the region in terms of accessibility, economic activity and lack of regard to sustainable transport policy. An expanded bus service to the North-West will therefore be vital in order to insure adequate linkages to the region. We therefore welcome the planned expansion of services along the Atlantic corridor of Derry-Letterkenny-Sligo-Galway which is not only vital to the North-West but also provide a counterbalance to the ever strengthening Dublin-Belfast economic corridor¹².

The lack of rail provision for the North-West should also be examined. **A feasibility study should be undertaken to examine the potential to extend the Western Rail corridor beyond Sligo to Letterkenny, and into the feasibility of extending the Belfast-Derry train line on to Letterkenny, a designated Gateway under the NSS.**

3.5.5 Developing Commuter Services to Galway

Galway city is the largest centre of concentrated economic activity in the BMW Region with growing numbers of commuters. **We would support the proposal submitted to the Gateway Innovation Fund by the Galway Gateway Authorities to upgrade the rail track to a double track between Ceannt Station and Athenry.** This would not only facilitate the development of further options and services for commuters to the city but it would also facilitate the development of the WRC.

4. Road: Nodal & Radial Road Networks

The ESRI¹³ recommended that national investment as a whole should shift away from radial networks towards nodal networks, thus reflecting the objectives of the National Gateway Strategy in the NSS and also leading to more sustainable settlement patterns. This introduction of nodal networks would facilitate connectivity within regions, link Gateway and Hubs and would benefit regional development.

Currently a radial network out of Dublin is further strengthening the dominance and spread of the Greater Dublin Area and is contributing to the urban sprawl that exists. The completion of the five major inter-urban (MIU) motorways out of Dublin are likely to further exacerbate this trend, with increased population growth along these corridors feeding into the Dublin region. This unsustainable pattern of urban sprawl is starkly highlighted by the fact that *'Dublin will soon occupy the same surface area as Los Angeles but with less than a quarter of its population'*¹⁴.

As a counterbalancing measure the utilisation of radial road networks around underdeveloped Gateway towns would facilitate their development. **There should be an increased emphasis placed on nodal networks throughout the BMW Region**

¹² Which is now service by a 24 hour, on the hour service.

and radial networks around the Gateways in order to facilitate the priorities set out in the NSS.

5. Cycling

Compared with other European countries Ireland's cycling infrastructure is inadequate and this is reflected in the continuing drop in the number of people using bicycles as their chosen daily mode of transport this is also reflected in a decline in cycling tourism in Ireland¹⁵. The needs of cyclists have mostly been set aside in favour of facilitating motor traffic.

Cycle lanes in urban areas (not only in GDA but nationally) are poorly planned, stop-start in nature and are often too narrow and too close to other forms of traffic for safe use. Existing cycle lanes are also poorly integrated with public transport, little provision is made to facilitate the carrying of bikes on trains and buses and there are little if any sheltered cycle parking at public transport interchanges.

For the cycling tourist there are few if any traffic free routes to cater for touring cyclists wanting to leave cities to discover the countryside. The development of cycle tourism presents a particular opportunity to bring the economic benefits of tourism to rural Ireland.

In order to counteract these issues we recommend that:

- ⇒ There is need to develop a national cycle network, considering both the urban and rural user accompanied by specific usage and infrastructure targets;
- ⇒ The government should strive to deliver a world-class infrastructure, this requires the roll out of a segregated cycle network and the following of best practice;
- ⇒ Cycle lanes should be a segregated network would provide the safest infrastructure for cyclists¹⁶;
- ⇒ It is also imperative that special attention is given to the design of junctions – the locations where the majority of crashes occur; and
- ⇒ Consideration could also be given to the 'rent a bike' scheme first applied in Copenhagen and now applied across other European countries¹⁷.

6. Walking

The propensity to walk is not only influenced by distance but also the quality of the experience. People may be more willing to walk further where their surroundings are more attractive, safe and stimulating. This requires the provision of adequate surveillance, sight lines and appropriate lighting as well as landscaping factors. The government must agree on and adopt targets that help to develop sustainable communities and neighbourhoods. **The government must develop plans to improve the public spaces for walking in accordance with adopted targets, including infrastructure funding.**

¹³ Fitzgerald, J., Kearney, I., Morgenroth, E. and D. Smyth (1999) National Investment Priorities for the Period 2000-2006 Policy Research Series No. 33 Economic and Social Research Institute Dublin

¹⁴ Urban Forum (2007). A Better Quality of Life For All.

¹⁵ Fáilte Ireland (2007). A Strategy for the Development of Irish Cycle Tourism. p.5.

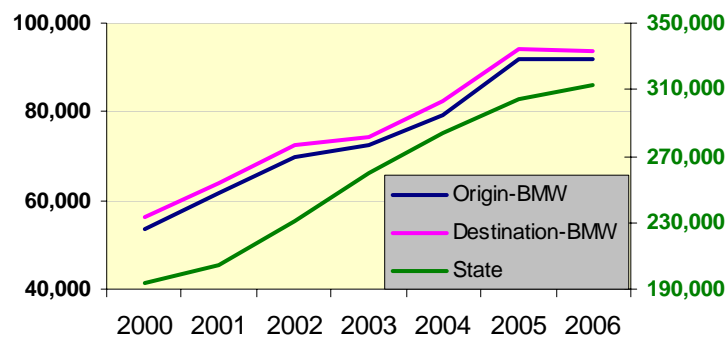
¹⁶ Options of a segregated facility include: (i) a segregated kerb at carriageway level or at pavement level or (ii) a 'raised adjacent' facility i.e. a level between that of a main carriageway and that of a footpath.

¹⁷ Committee of the Regions. March-April 2008. Regions and Cities of Europe. p.9.

7. Freight

Road freight transport has grown significantly in recent years. This trend is illustrated (in tonnes carried) in the following figure. This shows that Ireland has experienced an increase in tonnage carried of 54% between 2000 and 2006. The equivalent figure for freight with a final destination in the BMW Region grew by 54% and by 57% for freight which originated in the region. Given the increasing levels of freight transported by road, the use of rail can provide an energy efficient and effective method of transporting bulk and heavy goods and in turn help alleviate traffic congestion. **There should be a drive to increase the levels of freight that is transported by rail, this could be achieved by opening up the rail freight sector to private operators.**

Freight Tonnes Carried by Road by Origin & Destination BMW & State 2000-2006



Source: CSO Road Freight transport Surveys 2000-2006

8. Aviation

Dublin airport accounts for a disproportionate share of air journeys, Developing routes out of airports at Cork, Shannon and Knock will reduced the unsustainable traffic volumes to and from Dublin airport. Provision should be made to improve the transport links serving existing airports in terms of bus, road and rail, including the WRC: this can effectively extend their respective catchment areas and provide greater choice for passengers who in turn will enable an increase in services. This will bring benefits for inward investment, indigenous enterprise and tourism. **The government should develop an Air Access Strategy to address existing problems**

9. Additional Measures

Given that a large proportion of the population in Ireland lives in rural locations, which in turn leads to a heavy reliance on private transport for travel to work. Recent figures¹⁸ suggest that DSL coverage in rural areas in Ireland is only 64%, this place us 18th of the EU25. **The provision of facilities to enable people to work from home (through the provision of broadband) or from the immediate area due to the availability of local resources centres or technology could provide a significant counterbalance to current trends.**

¹⁸ EU Commission. 2008. Progress Report on the Single European Electronic Communications Market 2007 (13th Report).