

Strategic Framework for Investment in Land
Transport Consultation/SEA
Economic and Financial Evaluation Unit
Department of Transport, Tourism and Sport
Leeson Lane
Dublin 2

October 2014

Re: Investing in our Transport Future / Strategic Framework for Investment in Land Transport

Dear Sir/Madam,

We welcome the opportunity to provide input into the above public consultation process. This submission is being made through the work of the National Cycling Coordinator position on behalf of Cyclist.ie – The Irish Cycling Advocacy Network, a new position funded under the European Cyclists' Federation Leadership Programme (ECF 2014).

Introduction

While we note the steering group's decision to focus on "economic growth, improved competitiveness and sustainable job creation" (p.1) in prioritising investment, our overarching observation is that the framework fails to engage with some crucial issues as discussed below. Overall there is little, if any suggestion, of the need to shift direction in transport – and this in spite of the progressive work conducted around Smarter Travel (Department of Transport 2009a) and the National Cycle Policy Framework (Department of Transport 2009b). Most strikingly, there is no real acknowledgement of the need for a paradigm shift in the transport sector, in spite of the recent publication of the *Climate Action and Low-Carbon Development National Policy Position Ireland* which states:

The low-carbon road mapping process will be guided by a long-term vision of low-carbon transition based on – an aggregate reduction in carbon dioxide (CO₂) emissions of at least 80% (compared to 1990 levels) by 2050 across the electricity generation, built environment and transport sectors; (Government of Ireland 2014: 2)

The framework is completely underwhelming in this regard. While page 42 of the document reads "Reducing emissions from transport would require a transformation in the sector, relying on technological innovation and security of alternative fuels supply, supported by enabling policies and widespread behavioural change", unfortunately, this transport framework fails to set out how such a transformation can occur.

Planning

The framework rightly stresses the need for more effective spatial planning, recognising the links between land use and transport demand. The document would be more credible however if there was a more serious engagement with the reasons why the last National Spatial Strategy failed to prevent the development of very unsustainable development patterns and “embedded car dependency” (p11). There is little point drafting a new national spatial strategy unless some lessons have been learnt from the previous one. The importance of proper planning mechanisms cannot be emphasised enough. Spatial planning needs to be consolidated so that the built form is serviceable by public transport. It has got to cease being developer-led.

Health

There is minimal recognition of the negative health effects associated with a national transport regime in which “only around 10% of all kilometres travelled are by modes other than a car or van” (p.8). A continuation of this regime will guarantee jobs in the health care sector as obesity levels and associated health problems continue to grow and exert further unsustainable pressure on this benighted sector.

The strategy needs to state more clearly the health benefits of having a much higher share of trips taken by bike and on foot (see for example Cavill and Davis 2007). However, it is not only walking and cycling which can be considered active travel modes: public transport use generally involves walking (or cycling) at one or other end (or both ends) of the longer public transport part of the trip (Ming Wen and Rissel 2008).

Energy, Emissions and Resilience

There is no serious engagement in the framework with the issues around fossil energy use, greenhouse gas emissions and the resilience of the transport system. On this last point, the entire plan rests on the assumption that there will be unbroken supply of fossil energy (drawn from the most geo-politically turbulent parts of the globe) to power a continually increasing fleet of privately owned cars. The example (page 13) of residents of East Galway using Athlone as their shopping destination is an example of how utterly unsustainable travel patterns have become. A further issue here is the damage done to local economies (in East Galway) by extending the driving distances to Athlone.

In regard to air quality, the EPA report for 2013 released last week stressed that:

Ireland must develop and implement policies to reduce travel demand, emphasising sustainable transport modes such as cycling, walking and public transport and improving the efficiency of motorised transport. (Environmental Protection Agency 2014: 14)

The framework needs to engage with these issues in a serious way.

Liveability of towns and cities and Foreign Direct Investment

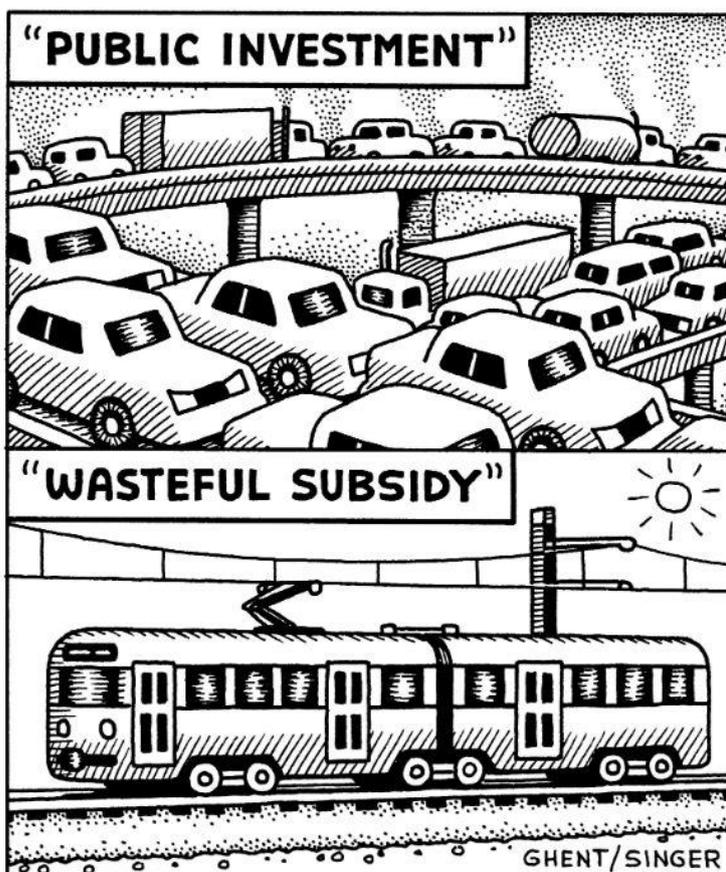
The framework stresses the need to attract foreign direct investment (FDI) to Ireland but fails to acknowledge the crucially important point of making towns and cities more liveable. Copenhagen has succeeded over the last two decades to recast itself as Europe’s most liveable city through investing seriously in cycling and curbing car use (e.g. removal of car parking spaces on a phased basis), with the result that approximately 33% of journeys in the city are undertaken by bike. Cycle use also includes the transport of goods and it is estimated that there are 40,000 cargo bikes in the city. This has important decongesting effects on the city.

(Cycle Luxembourg asbl 2013). This type of ambition needs to be articulated in the Irish framework.

Improvements in public transport and cycling infrastructure generally result in the improvement of the public realm, and the improvement of the civic environment for the citizens. This is also recognised in the discussion in Paper 21 'New Transport Appraisal Framework'

Journeying: Dead-time versus Productive Time and Project Appraisal

A significant macro-shift over the last decade has been with the rapid growth in the use of Information Communications Technology (ICT). This has meant that the journey experience on public transport has been transformed into one in which work and other useful tasks can be carried out on the move – on one’s lap-top, tablet or smart phone. Therefore time spent on public transport is not ‘dead time’ (Lyons et al. 2012). This contrasts markedly with the in-car experience and especially the in-car as a driver experience when it is either not possible or else not safe to be multi-tasking while on the move. The recent change in the penalty points regime in relation to mobile device use is to be welcomed. For service/knowledge workers in particular, time spent on quality public transport can be productive, whereas time spent driving is wasted time. This shift in practices needs to be built into the strategic transport framework. The economic benefits of *investing in* rail (in particular) and bus increase when there is a recognition of this shift. Singer’s point holds some relevance here:



We do commend the move to establish a wide ranging and definitive basis for Project Appraisal. We suggest that this needs to be the priority for the Department to enable it to assess investment into the future.

We emphasise caution in the choice of transport infrastructural projects into the future. The ultimate goal is to improve transport connections for the majority of people. New road construction is often the first and 'obvious' choice, but assessment of alternative projects in the area of public transport and cycling needs to be rigorously developed.

Peak car

There is no reference in the framework or acknowledgement of the international phenomenon of 'peak car': "the observation of slower rates of growth, levelling off, or reduction, in various measures of car use, which have been seen in many though not all developed countries" (Goodwin and Van Dender 2013: 243). Whilst there are many factors underpinning these shifts - and recessionary reasons are just one of them - the desire for people (Millennials in particular) to be online all of the time appears to be prompting many to forego (expensive) car ownership and opt instead to use more public transport, complemented by public bicycle schemes, private bike use, taxis and car share. The framework needs to engage with the idea that a low carbon future will have to entail more and more people choosing car (owning) free lives.

Having said that, 'peak-car' would not appear to have reached our shores just yet as evidenced by the latest national private fleet statistics where, to end September 2014, a total of 93,175 cars were registered for the first time. More worryingly 20,936 of the total were SUV / 4x4 body-type, which mostly fail to meet EuroNCAP pedestrian and cyclist impact standards. Furthermore, the inexorable drift to diesel-fuelled engines continues apace (74% of fleet) despite the high PM <2.5 particulates associated with that fuel.

Does the Department see itself as totally non-interventionists when faced with this marked change in car ownership patterns? *Laissez-faire* surely cannot be an option when a strategic review is being conducted?

Short Journeys

Page 8 of the framework states:

the 2009 National Travel Survey found that demand is dominated by short journeys. In total, 41% of all journeys are four kilometres or less, and a further 17% are between four and eight kilometres. While walking is the predominant mode for journeys of 2 kilometres or less (with a 51% mode share), over 40% of such short trips are carried out as a vehicle driver. For journeys between two and four kilometres, the vehicle driver mode share increases to almost 70%.

It follows here that investment in cycling (as per the National Cycle Policy Framework) needs to be greatly underlined in the wider framework. This is particularly the case when one considers the much higher BCR's of investing in cycling compared to other modes. See next point.

Benefit Cost Ratios of Investing in Cycling

Benefit cost ratios are provided for a road scheme (M4/M6 – BCR of 1.56) and the Luas tram (BCR of 2.96). BCRs for cycle schemes of over 10 and 20 (see for example Nick Cavill et al. 2008; Haubold 2014) strongly suggest that it makes much greater economic sense to provide further investment in cycling schemes.

Furthermore, the framework stresses the very high maintenance costs of the road and rail network. The other side of the coin, of course, is that if a serious modal shift in urban cycling

was to occur – say to 20-30% of trips in urban areas – this would have very positive consequences in term of lowering road maintenance costs. This needs to be acknowledged in the framework.

In a time of scarce investment resources, investing in cycling makes sense.

Public bikes and integrating transport

There are now approximately 750 public bike schemes globally (Meddin and DeMaio 2014) and by 2015 there will be five schemes on the island of Ireland (Dublin, Galway, Limerick, Cork and Belfast). Such schemes have become an essential part of urban mobility globally and are succeeding in knitting public transport provision into the heart of city centres. Both public bike schemes and everyday utility cycling (of privately owned bicycles) are helping to increase the catchment area of public transport.

We are disappointed that Sect. 5.2 states that “promoting modal switch to active travel modes will not yield significant CO2 reductions”. This statement does not take into account the wider potential for cycling to support public transport and therefore create a broader downward shift in emissions. A major modal switch to meet national targets needs to be backed up by bold investment choices.

Rail

Page 27 raises the question “What extent of the rail network is it appropriate to retain?”. The logic inherent in this (loaded) question is that it is fine to make the network less of a network and thus less useful overall. We agree that a new rail policy is required, but this policy must recognise the lack of historic investment in Ireland's rail network, the need for modernisation and upgrading, and the provision of a real alternative for travellers. Most crucially, the policy must address the need for GHG emission reductions.

Furthermore, previous investments in motorways such as M6 to Galway, placed the public rail network in direct competition with the road network, resulting in passenger losses on public rail transport. This is one of the 'disbenefits' of motorway construction not picked up in Paper 9 on 'The Wider Impact of Transport Investment'. The paper states that 'VFM must be central to future rail policy'. It is noticeable that this is the only form of transport that has this statement made about it in the report! At the same time Paper 8 on the 'Impact of Previous Investments' admits that an investment of €1.7bn in rail over the period 2006 to 2010, but 'a large portion of the expenditure was spent on bringing the existing network up to an appropriate safety standard'. This investment in Rail compares to an investment of €9.1 bn in Roads over the same period! There needs to be balance in the future assessment of real transport alternatives.

For comparison, consider the Norwegian Land Transport Plan 2014-2023, which advises an investment in Rail essentially equivalent to Road (€1.2bn per annum). This is the real crux! Government must decide on the priorities of public over private transport!?! Norway has a similar population to Ireland. Furthermore, the European Commission recently announced that it was adopting

"Shift2Rail", a new public-private partnership to invest just under €1 billion in research and innovation to get more passengers and freight onto Europe's railways. Rail is amongst the most efficient and climate-friendly forms of transport, but currently it only carries about only 10% of European cargo and 6% of passengers each year. (European Commission 2013)

While the framework contains a number of statements about about “the need to move away from the ‘predict and provide’ approach to transport planning and investment” (p31) - and these are to be welcomed - these statements do not dovetail well with the multiple inferences that the rail network needs to be pruned back.

Social Inclusion

We note the point that “Public transport also contributes strongly to the mobility of the older population in urban areas.” (page 40). In the context of an upward shift in the age profile of our population over the coming decades (Central Statistics Office 2013), it is essential that non-car driving options become more widely available. Furthermore, to return to the public health argument, it is essential that the DoTTAS recognises the positive health effects that life long utility cycling provides (see for example Cahill 2014).

Cycle Tourism

Re: Transport and tourism, we would stress Ireland’s strengths as a potentially top class cycle tourism destination. This can be developed with fairly modest investments in a high quality cycling routes and, in particular, in the EuroVelo cycling routes: EV#1 Atlantic Route and EV#2 Capitals Route.



Euro-velo Network. (European Cyclists' Federation 2013)

The potential for the European Investment Bank to seed fund the development of a National Cycle Network needs to be recognised and explored. The benefits are substantial, and the impetus this would give to increasing a mode switch to cycling are huge!

In Conclusion

The elephant in the room in regard to the framework is climate change. This issue needs to shape the framework rather than being swept under the carpet. We look forward to seeing a completely recast framework in which the global scientific consensus on climate, the Copenhagen Accord and Irish Government commitment to a low carbon future by 2050 in proposed new climate legislation are fully acknowledged.

I would be grateful if you could acknowledge receipt of this submission and advise us of any further steps in regard to the development of the framework.

Yours faithfully,

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