

Submission on Local and Rural Transport to the Department of Transport, Tourism & Sport

**Approved by the Council of the Chartered Institute of Logistics &
Transport in Ireland on 24 September 2012**

1 Introduction

The Chartered Institute of Logistics & Transport in Ireland (CILTI) is taking the opportunity of the establishment of the National Integrated Rural Transport Committee (NIRTC) to make this submission to Alan Kelly TD, Minister for Public Transport, on policy and strategy related to local and rural transport in Ireland. The CILTI welcomes the establishment of the NIRTC and supports its aims and objectives.

In order to prepare this submission, the Institute has taken into account the experience obtained and reports associated with the development and operation of local and rural transport services over the past decade as well as the experience and expertise of members of its Policy Committee, including many years service in public transport operations and research, involvement in the Rural Transport Programme and the Local Integrated Services project and participation in several European Union transport projects. The reports referred to include "Progressing Rural Public Transport in Ireland" (Fitzpatrick Associates, 2006), the Deloitte/TAS Cost and Efficiency Review of Bus Atha Cliath and Bus Éireann (2009) and the Value for Money reports on School Transport and the Rural Transport Programme (2011). The submission also takes account of the deliberations and conclusions of the CILTI Conference on Rural Transport Policy & Strategy (2011).

2 Summary: Ireland requires a stated policy on local and rural transport

Outside of urban areas, in Ireland the mobility situation is very simple – you either have a car or you don't. If you don't have a car, then you are dependent on lifts from others and such public or group transport as is available. If these options are not readily available to you, then your mobility and participation in society is constrained, with impacts ranging from inconvenient to devastating.

This submission deals with three linked issues:

- What minimum level of mobility services (baseline) should be provided in different Irish situations – towns, hinterlands and rural areas?
- What can be achieved with existing resources, and what is the scale of the remaining 'gap' between what is required and what is delivered?
- If the 'gap' to minimum service levels cannot be fulfilled, due to scale or nature, do we need new options?

The CILTI is of the opinion that a comprehensive policy is required on local and rural transport, which clearly establishes:

- the target level of transport services to be provided for various categories of local urban and rural areas
- how and by whom these services should be regulated and organised
- how they should be operated
- how they should be financed
- how they integrate with other mobility services.

The Institute makes no presumption about the actual level or type of transport services which should be provided or whether by publicly or privately owned operators, but only proposes that there should be a clear policy and implementation framework, which ensures the fair allocation of those services across local and rural areas.

3 Development of a comprehensive policy

In order to identify an appropriate framework, the Institute reviewed the Regional Transportation Strategy developed by the Department for Regional Development in Northern Ireland because their approach was considered to be directly relevant to the development of a comprehensive policy here. The Northern Ireland framework identifies a public transport service level norm which constitutes a 'reasonable' level of public transport to enable individual and community life to function effectively. It recognises that marked differences in accessibility are experienced by people living in settlements that are either on, or within walking distance of, the 'main roads' served by the bus network, and those in the remoter areas and that there are also marked differences in accessibility between people who are able to walk reasonable distances and get onto and off existing buses, and those with limited personal mobility.

Service levels are described in the context of

- two location types:
 - small settlements
 - deep rural
- two groups of people:
 - those with mobility impairment
 - those without.

The Regional Transportation Strategy identifies a range of service types, which are similar to those operated under the Rural Transport Programme and throughout Europe and North America:

- Fixed route services using large buses (with improved access features)
- Fixed route services using small buses
- Variable route services using small buses
- Demand-responsive door to door transport:

- dial-a-ride services (using fully accessible multi-occupancy vehicles)
- taxis and private hire cars (providing a transport service, but no specific additional travel care)
- community car services (volunteers providing both transport and an element of care or assistance to passengers).

A set of matrices were then developed in order to prepare estimates of minimum service levels:

- Matrix of settlement population size and service level scoring, based on types of service and frequency.
- Matrix of population size of where (location types) and who (people categories – young, old etc), based on census data.
- Matrix of services needed, related to the population size matrix.
- Matrix of service levels, related to the population size matrix.
- Estimates of take up, occupancy and costs by service type and location.
- Estimated cost per trip by service type, location, degree of reduced mobility and density of no-car households.

This resulted in minimum service levels for a range of population sizes, which are set out in the following two tables. This is a model well worth considering by the NIRTC as it tries to formulate an approach to the development of integrated transport services in the smaller towns and rural areas of this state.

Settlements were grouped into one of five categories according to population, as described in Table 1 below. A target level of bus service provision was set for each of the settlement categories, and is indicated in the table by an index score, for each of the following periods:

- Monday – Friday daytime (0700–1800)
- Saturday daytime (0700–1800)
- Monday – Saturday evening (after 1800)
- Sunday

Table 1: Minimum bus service index by total settlement population

Settlement population	Daytime indices		M-S evening index	Sunday index	TOTAL
	Mon-Fri	Saturday			
100 – 249	10	0	0	0	10
250 – 649	15	4	3	0	22
650 – 1,499	30	6	6	4	46
1,500 – 3,499	35	8	6	4	53
3,500 – 10,000	55	10	8	8	81

Settlements were assessed in each time category independently.

The specified levels of service for each index score awarded are shown in Table 2 on the next page. Some of these scores (marked *) are cumulative, and each occurrence adds to the overall index; the others are alternatives, and no more than one applies to each time period. Thus Items 3-6 are cumulative because they cover different time periods in the peak and Items 11-13 are alternatives to Items 3-6 as they cover frequencies for both peak and off peak periods.

Table 2: Relationship of revised index to bus service levels

Item	Level of service	Index score
1	No service	0
DAYTIME MONDAY – FRIDAY (off-peak = 0900-1600)		
2	School service only (only if available to other passengers)	5
3	Arrival at destination 0701-0800 daily Mon-Fri *	10
4	Arrival at destination 0801-0900 daily Mon-Fri *	10
5	Departure from destination 1601-1700 daily Mon-Fri *	10
6	Departure from destination 1701-1800 daily Mon-Fri *	10
7	At least one off-peak return journey on 1 day per week	5
8	At least one off-peak return journey on 2 to 4 days per week	10
9	One or two off-peak return journeys, daily Mon-Fri	15
10	At least three off-peak return journeys, daily Mon-Fri	20
11	At least every 2 hours, daily Mon-Fri	24
12	At least hourly, daily Mon-Fri	28
13	At least every 30 minutes, daily Mon-Fri	30
DAYTIME SATURDAY (off-peak = 0900-1700)		
14	Arrival at destination before 0900 *	2
15	Departure from destination after 1700 *	2
16	One or two off-peak return journeys	4
17	At least three off-peak return journeys	6
18	At least every 2 hours off-peak	7
19	At least hourly off-peak	8
EVENING MONDAY – SATURDAY (after 1800)		
20	At least one return journey 1-4 days per week	3
21	At least one return journey 5-6 days per week	6
22	At least three return journeys 5-6 days per week	8
23	At least hourly until 2200 hrs, daily Mon-Sat	10
SUNDAYS		
24	At least two return journeys per Sunday	4
25	At least every two hours	8

The allocation of financial support to meet the needs and demand identified takes into account the costs associated with the provision of the appropriate service type.

In the Department of Transport, Tourism & Sport (DTT&S) press release dated 28 February 2012 regarding plans for the integration of rural transport services, such services were referred to as "local and rural transport services", but the word "local" has not been included in the title of the new Committee nor included in any of the narrative describing the scope of the NIRTC. The Institute considers that the mandate of the Committee should extend to all public transport outside of the Greater Dublin Area, Cork, Galway, Limerick and Waterford, given that many of Ireland's small towns do not have a public transport service.

The NIRTC appears to focus solely on road based transport services, but some rural areas and smaller towns are also served by rail, albeit mostly on so-called "less well used lines". The Institute feels that rail services in rural areas and connecting road based services should also be considered by the Committee when developing a comprehensive policy on local and rural transport.

4 The importance of local and rural transport services

Over the past 50 years, there has been a continual decline in rural population, and in the businesses, services and other facilities in rural areas and villages. Ubiquitous car-based mobility has resulted in business and facilities being centred in towns causing a further decline in employment, shops, post offices and other services in rural areas.

While most households in rural areas have one or more cars and the majority of people can make trips by car, there is a sizeable minority of people who have limited or no access to a car when they need to travel. This is the case even in households where there is a car.

In particular, older people, people with reduced mobility or disabilities, teenagers, parents with young children, and low-income single men and women have been identified as groups who have low access to car travel. As a result, they are either dependent on others or their activities are curtailed.

Older people and people with reduced mobility or disabilities are at very high risk of social exclusion to the point of extreme isolation and an inability to participate in society in any meaningful way.

Teenagers, parents with young children and low-income single men and women face difficulties in job-search, getting to work and in access to services and leisure.

The School Transport System is a well-organised scheme which ensures access for primary and second-level schoolchildren to their nearest suitable school. It is not available to the general public. As it operates to the formal school times, children wishing to avail of after-school study or sports activities must either arrange alternative transport or forego the activity.

There is a basic minimum public transport service in most rural areas, ensuring at least a weekly opportunity to get to shops, banks, post offices and health services. However, for other activities and at other times people have to hire taxis at high expense, seek favours from others or simply forego a wide range of needed activities and services. A similar situation pertains in most urban areas in Ireland outside the Greater Dublin Area, the cities of Cork, Galway, Limerick and Waterford and the very small number of other towns, which have a local public bus service.

5 Strategic issues of concern

The national policy framework for local and rural public transport will need to overcome the deficiencies in the current system, which sees many people heavily reliant on private cars. This over-reliance is totally contrary to the objectives of the Smarter Travel programme and other measures to curb CO₂ emissions from transport.

Extensive community input has been harnessed for the development, governance and ongoing operation of the Rural Transport Programme. The NIRTC needs to ensure that community participation is not undermined but built upon to provide the basis for integrated local and rural transport services. Local involvement will further assist in gaining community support.

The national policy framework will need to ensure that all public local and rural transport services are provided within an integrated and coherent policy, regulatory and financing context and that there is formal integration with local development programmes.

The School Transport System is coming under financial pressure. On one hand the eligibility rules are being tightened, on the other the contribution from families is continuing to move it closer to a "user pays" service. Opening up these segregated 'closed' services to other users might be a relatively low cost way of expanding local and rural public transport services as well as making them more cost effective, thereby easing the financial burden on both the STS and families.

Some rural areas and smaller towns are served by infrequent and poorly marketed rail lines, which feed passengers into the main lines as well as providing a useful link to larger urban centres. Experience in other European countries has shown that properly marketed and resourced rural rail services,

supported by imaginative community involvement, can make better use of this existing asset and improve the viability of such lines.

Most rural areas having some form of public transport service, whilst many urban areas do not, is not equitable, nor is it the most effective use of financial and vehicle resources. For example urban areas are likely to require lower levels of subvention per passenger due to more customers and higher population densities.

6 Technical issues of concern

The stated intention of the NIRTC to reduce duplication and waste by better co-ordination of existing vehicle resources to provide public transport services will mean that vehicles unsuitable for use by people with reduced mobility are likely to be deployed to operate these services. This raises an important issue in relation to sectoral policy under the Disability Act which needs to be addressed by the Committee, involving the setting of a timetable under the Sectoral Plan for Transport for all local public transport services to be operated by fully accessible vehicles, e.g. low floor easy access buses. Very few such vehicles are in operation outside the Greater Dublin Area and the cities of Cork, Galway, Limerick and Waterford. Clare Accessible Transport has pioneered the deployment of small easy access buses as the key to providing its integrated local services in Clare and South Galway and meets the type of service model being advocated by the NIRTC.

A transport policy with clear levels of service targets should be developed. For example, a minimum level of service for each community based on population size as outlined in the Regional Transportation Strategy in Northern Ireland would be an equitable way to determine the allocation of services across rural and small urban communities. The Institute recognises that financing a comprehensive national programme would be difficult at present given the challenges faced by the public finances. However this should not be an excuse for not developing an integrated national policy framework for the delivery of public transport services in local and rural areas. Such a framework will also ensure a more equitable and transparent distribution of resources, no matter how limited they are.

The Committee needs to consider if the existing institutional model is suitable for the effective delivery of enhanced and integrated local and rural transport services. This should include in particular a review of ways to ensure greater involvement of local authorities while retaining the expertise of existing service providers and the existing community involvement in rural transport.

As part of its consideration of the appropriate institutional structure, the Committee should consider how the experience and expertise of Bus Éireann's School Transport Offices and the RTP operating groups might be included in

the planning and procurement processes and procedures for securing and delivering integrated local and rural public transport services.

The promotion and marketing of services needs to be improved so that they are seen to be for the general public and not just for socially disadvantaged people. This also supports the move towards more integrated 'open' services.

The Government is considering a new regime for the regulation of hackneys in rural areas and this could also be extended to small urban areas. This review should also consider how to ensure that over time the vehicles used are accessible to people with reduced mobility. Charging separate fares similar to local bus fares on such services should also be considered.

7 Summary of the CILTI's views

The Institute believes that reasonable access to public transport for every citizen supports sustainability and social inclusion objectives.

The Institute believes that a single policy framework covering all local and rural public transport services outside the Greater Dublin Area and the four other main cities should be developed which will provide the basis for an integrated public transport service network catering for all citizens and visitors. This framework should be capable of phased implementation, taking full account of the available public funding at any particular time. It would also have the benefit of providing a more equitable and transparent method of allocating scarce State financial support.

The national integrated network should be able to serve people with daily travel needs while also meeting social inclusion objectives. This would be best achieved by the co-ordination at the point of delivery of the various local passenger transport services being paid for by the Government currently through the public service contracts, the Rural Transport Programme, the School Transport Service and the HSE's non-emergency transport provision.

The NTA is currently carrying out a review of the implementation of public service contracts. Since local and rural transport services are likely to require public service obligation payments, the Institute believes that the review should consider how these services can be integrated into the future public service contract regime.

The new framework for local and rural integrated transport services should include a greater role for local authorities as they have in most other countries in Europe. It should also fully avail of the experience and expertise of existing public transport providers, both publicly and privately owned ones.

The Institute recognises the significant voluntary contribution made at governance, organisational, operational and outreach levels in the Rural

Transport Programme and considers this should be retained, fostered and expanded in any new framework for the delivery of local and rural public transport services.

The Institute considers that there is merit in exploring the potential for more imaginative ways of operating and marketing services on less well used rail lines as part of a comprehensive approach to local and rural public transport.

The Sectoral Plan for Transport under the Disability Act will need to be updated to provide a timetable for the provision of fully accessible vehicles to operate local and rural public transport services. An accompanying investment programme will need to be developed and implemented over an agreed timeframe. This investment programme would incorporate those currently administered by the NTA and the HSE and would be related directly to the range of service types covered by the new policy framework.

Local and rural transport services need to be better integrated with the mainstream passenger transport and mobility programmes and with the relevant planning and regulatory frameworks. They also need to be integrated with the travel information, journey planning, ticketing and promotion systems for all passenger transport, including rail services in rural communities and smaller towns.