



National Women's  
Council of Ireland  
Comhairle Náisiúnta  
na mBan in Éirinn

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Submission to the Department of Transport, Tourism  
and Sport on the Sustainable Mobility Policy: A review  
of Ireland's public transport and active travel policy

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## Introduction

The National Women's Council of Ireland (NWCi) welcomes the opportunity to submit our views to the Department of Transport, Tourism and Sport on their review of the Sustainable Mobility Policy. This work is kindly supported by the Department of Rural and Community Development through the Scheme to Support National Organisations (SSNO) administered through Pobal.

NWCI is the leading national women's membership organisation in Ireland. Established in 1973, it represents a membership base of over 190 groups and organisations across a diversity of backgrounds, sectors and locations and is committed to the promotion of full equality between women and men.

This submission aims to highlight women's needs regarding sustainable mobility, calling for urgent action to incorporate a gender analysis of mobility in Ireland. We are concerned that transport facilities and active travel options fall short of an inclusive approach and neglect the needs of women from minority ethnic groups and women with disabilities. If Ireland is to build an inclusive sustainable mobility system, where everyone feels comfortable and safe going to and from work, schools, college, creches, shops and leisure, then we believe that an inclusive approach must be undertaken - one which complies with the Public Sector Duty and which designs for a range of needs. This approach is underpinned by the following United Nations' Sustainable Development Goals (SDGs) ; Goal 11 which sets out to make cities and human settlements safe, resilient and sustainable<sup>1</sup> and Goal 5 which sets out to achieve gender equality and empower all women and girls.<sup>2</sup> In 2019, NWCI was recognised as one of the first SDG Champions by the Minister of Department of Climate Action, Communications and Environment.(DCACE)<sup>3</sup> The World Bank has

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<sup>1</sup> Sustainable Development Goal 11: Make cities and human settlements inclusive, safe, resilient and sustainable. Available at: <https://sustainabledevelopment.un.org/sdg11>

<sup>2</sup> <https://sustainabledevelopment.un.org/sdg5>

<sup>3</sup> [https://www.nwci.ie/learn/article/nwci\\_recognised\\_as\\_sustainable\\_development\\_goals\\_champion](https://www.nwci.ie/learn/article/nwci_recognised_as_sustainable_development_goals_champion)

also recommended the need to integrate gender into transport policies and programmes.<sup>4</sup>

This submission outlines why a gender perspective is essential for the design of a future sustainable mobility policy for Ireland and that this commitment must be upheld by the Department of Transport, Tourism and Sport as part of its public sector duty: to promote equality, prevent discrimination and protect the human rights of their employees, customers, service users and everyone affected by their policies and plans<sup>5</sup>.

Despite the fact that transport projects and policies are often considered to equally benefit women and men, there is a large body of professional literature emphasising that transport is not gender neutral.<sup>6</sup> According to these studies, gender is a significant factor in accounting for differences in mobility and travel behaviour.

## **Public Sector Duty**

Section 42 of the 2014 Human Rights and Equality Act states that all public bodies in Ireland have responsibility to promote equality, prevent discrimination and protect the human rights. The public sector duty places an obligation on the Department of Transport, Tourism and Sport to better understand the current inequalities that exist within Sustainable Transport Schemes and Initiatives and to take steps to effectively remedy them to ensure that sustainable and active travel, along with the many co-benefits associated with it, is made safe, accessible and affordable for all.

Embedding the public sector duty within transport and public space is essential to meeting the wider commitment to a “just transition” to a low carbon society. It corresponds with the commitment under Goal 11 of the SDGs to make cities inclusive, safe, resilient and sustainable. In the case of Dublin, it also corresponds with the goals of the UN Safe Cities for Women programme, to which the city is signed up to.

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<sup>4</sup> World Bank. 2011. Making Transport Work for Women and Men: Challenges and Opportunities In the Middle East and North Africa. World Bank Report, September 2011. Available at:

<http://siteresources.worldbank.org/EXTTSR/Resources/463715-1322323559362/Gender-Transport-MENA.pdf>

<sup>5</sup> IHREC. 2019. *Implementing the Public Sector Equality and Human Rights Duty: Section 42 of the Irish Human Rights and Equality Commission Act 2014*. Irish Human Rights and Equality Commission, March 2019. Available at: <https://www.ihrec.ie/our-work/public-sector-duty/>

<sup>6</sup> [https://eige.europa.eu/gender-mainstreaming/policy-areas/transport#\[1type\]](https://eige.europa.eu/gender-mainstreaming/policy-areas/transport#[1type])

The Stockholm Declaration (agreed at the 3rd Global Ministerial Conference on Road Safety, 19-20 February 2020) recognises “the right of every individual to the enjoyment of the highest attainable standard of health”. The Declaration welcomes:

*United Nations General Assembly resolution 70/1 of 25 September 2015, entitled ‘Transforming our world: the 2030 Agenda for Sustainable Development’, and the Sustainable Development Goals (SDGs) as a framework to integrate road safety in other policy areas, especially policy areas relating to SDG targets for Climate Action, Gender Equality, Health and Well-Being, Quality Education, Reduced Inequalities, Sustainable Cities and Communities, Infrastructure and Responsible Consumption and Production for mutual benefits for all*

And acknowledges

*the lessons learnt from the Decade of Action for Road Safety 2011–2020 such as the need to promote an integrated approach to road safety such as a safe system approach and Vision Zero, pursue long-term and sustainable safety solutions, and strengthen national inter-sectoral collaboration including engagement with NGOs and civil society as well as businesses and industry which contribute to and influence the social and economic development of countries*

The commitments agreed by the 140+ signatories include:

*Include road safety and a safe system approach as an integral element of land use, street design, transport system planning and governance, especially for vulnerable road users and in urban areas, by strengthening institutional capacity with regard to road safety laws and law enforcement, vehicle safety, infrastructure improvements, public transport, post-crash care, and data;*

*Speed up the shift toward safer, cleaner, more energy efficient and affordable modes of transport and promote higher levels of physical activity such as walking and cycling as well as integrating these modes with the use of public transport to achieve sustainability*

## Women and the Climate Crisis

Ireland has become the second country in the world to declare a climate and biodiversity emergency. International research has established that as these climate impacts increase, existing inequalities, deprivation and exclusion will be worsened, with the worst impacts on women.<sup>7</sup> Our transition must be a just transition and all measures must incorporate mitigation and climate justice investments to ensure rural communities, households experiencing energy poverty or lower socio-economic groups do not experience further inequality and poverty.

According to DCACE, transport accounted for almost 20% of our greenhouse gas emissions in 2017. Vehicles used in Ireland are 98% dependent on fossil fuels. Among workers and students, approximately 400,000 people travel 4 kilometers or fewer to work or school or college by car every day, distances that for many could instead be travelled by cycling, walking or using public transport.

The current dependency on high carbon forms of transport inhibits collective efforts to meet carbon emissions reduction targets and also has significant implications for public health as a result of poor air quality.

*Ireland performed poorly compared with the emissions of other EU Member States in 2017. Ireland ranked 18th worst for PM2.5; 11th worst for sulphur dioxide; worst for nitrogen oxides; seventh worst for ammonia; and worst for NMVOC's.<sup>8</sup>*

Decarbonisation and moving to improved efficiency and management of our public transport are key to overall improvement to air quality and consequent benefits for public health.

However, the move to sustainable modes of transport is unlikely to be achieved without addressing the specific needs of women, addressing existing gendered and gender-blind approaches to such modes of transport and the public realm, and equality-proofing for diversity, including those women who may face discrimination on multiple grounds. Due to unequal power relations and socially constructed gender

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<sup>7</sup> European parliament-The Gender Dimension of Climate Justice 2015

<sup>8</sup> CSO. 2019. Environmental Indicators Ireland 2019. Central Statistics Office, 26 August 2019. Available at: <https://www.cso.ie/en/releasesandpublications/ep/p-eii/eii19/mainfindings/>

norms that shape the rights, roles, capacities and preferences of women and men, we know that women and men do not experience climate change equally.<sup>9</sup> We need a just, intersectional, feminist transition for women in Ireland when it comes to action on climate breakdown. Women could be disproportionately affected by policies put in place to tackle the climate crisis based on gender but also in terms of their class, race, culture, ethnicity, ability, age, as well as geographical location. It is crucial to understand this multiple discrimination when it comes to developing policies to address the scale of the crisis.

Inequalities between men and women continue to be persistent and far reaching and pervasive. Women have been traditionally under represented on decision-making structures. Women are frequently multiply disadvantaged by policies that do not recognise their different realities and lived experiences, including unequal and low pay, responsibilities at work and home, and gender-based violence.

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Women are more likely to be poor, to parent alone, to be the main provider of unpaid care work, to be in precarious employment, to earn low wages and to be at risk of domestic or sexual violence.

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International practice continuously and repeatedly shows through research and experience that the inclusion of women when taking decisions at all levels (community, local, national, regional, and international) increases human resilience and adaptation to climate change. Womens role is paramount if we are to protect our environment intergenerationally and into the future. Womens rights and equality must be incorporated into any mitigation or climate adaptation plans in order to maximise their efficiency. We need women participating in policy formation, gender indicators to check against policy delivery and effectiveness and a focus on how and where money is spent using a gender budgeting framework.<sup>10</sup>

The Government have clear commitments and human rights obligations to protect all the people of Ireland to address the climate change crisis through reducing our carbon emissions. Regardless of the undetermined nature of the future for climate action in Ireland, the move towards a solution must be just. Any changes within policy,

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<sup>9</sup> <https://www.mrfcj.org/principles-of-climate-justice/>

<sup>10</sup> Loftus, C., 2017. Towards gender responsive budgeting in Ireland. NWCI.

legislation, taxation and social attitudes must not place a disproportionate burden on any one group within society. In fact, the transformation towards clean, carbon-neutral societies provides an opportunity to narrow ever-growing social and economic inequalities in the form of climate justice.

The Environmental Protection Agency (EPA) notes that the biggest source of green house gas (GHG) emissions in Ireland is agriculture, followed by the energy sector with transport in third place. Between 1990 and 2017, Green House Gas from transport in Ireland increased by 133.2% (NESC, 2019). Our transport policy is a key area where we can deliver on our commitments to the planet but also to addressing economic and social inequalities experienced by women.

*‘we must invest in structural and behavioural change to enable the transition to carbon neutral, climate resilient Ireland. These changes include the rapid decarbonisation of energy and transport and the adoption of sustainable food production, management and consumption systems’.* (EPA, 2016)

### **What should be our vision for sustainable mobility?**

*“Public transport provides an example of a universal service where lack of capital investment and a weak level of public spending can result in significant economic inequalities being experienced.”*<sup>11</sup>

Viewing public transport as a universal good means shifting priorities to increasing capital investment and more public spending. Lots of public transport services and routes would not necessarily be profitable in the purely monetary sense, but the benefits of a demand responsive service would mean a better quality of life, meeting our climate action targets and improving the life opportunities for many women in rural communities.

NWCI’s submission to Budget 2020 included the following recommendation:

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<sup>11</sup> Cherishing All Equally: Economic Inequality in Ireland Nat O’Connor and Cormac Staunton Tasc 2017 [https://www.tasc.ie/download/pdf/tasc\\_cherishing\\_all\\_equally\\_web.pdf](https://www.tasc.ie/download/pdf/tasc_cherishing_all_equally_web.pdf)



*“Dept. of Finance and Public Expenditure & Reform to ensure that all major capital infrastructure investment has been gender impact assessed, including a gender audit of all major transport initiatives.”<sup>12</sup>*

This recommendation reflects a growing recognition that transport schemes have often failed to consider gender differences previously and have resulted in an inequality in mobility and access to the public realm.

## **What objectives should we prioritise?**

### Car dependency

The public transport service is under resourced and does not provide universal coverage. There remains a high dependency on car usage in order to travel for work or study, shopping or accessing services. According to Census 2016 figures, car ownership among households is continuing an upward trend with nearly 77% of households in urban areas owning at least one car compared with 91% of households in rural areas. Other noteworthy gender differences in the use of transport include van/lorry drivers where just 2.3% of users are women and motorcycling where just 13% are women. Rural households are also more likely to have two cars or more: 54.5% of car owning households in rural areas compared to 33% in urban areas.<sup>13</sup> We not only have high car ownership but also high car usage compared with our European counterparts. This is clearly an unsustainable situation in the face of declining fossil fuel reserves and national commitments to reducing carbon emissions. In 1986, 27% of women were driving and now it's 65%.<sup>14</sup> Women often have more complex journeys, which can include getting groceries and dropping and picking up children and visiting elderly parents.<sup>15</sup> The resulting dependency and high usage is a consequence of being time poor, lack of confidence in the safety of other modes of transport and the costs associated with public transport in some parts of the country. An adequate service to meet all transport needs does not exist.

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<sup>12</sup> NWCI. 2019. *Equality Now: Invest in Women. National Women's Council of Ireland Pre-Budget Submission 2020*. National Women's Council of Ireland, 2 July 2019. Available at: [https://www.nwci.ie/learn/publications/category/pre\\_budget\\_submissions](https://www.nwci.ie/learn/publications/category/pre_budget_submissions)

<sup>13</sup>[http://www.cso.ie/en/media/csoie/newsevents/documents/census2016summaryresultspart2/Chapter\\_8\\_Travel\\_patterns\\_and\\_car\\_ownership.pdf](http://www.cso.ie/en/media/csoie/newsevents/documents/census2016summaryresultspart2/Chapter_8_Travel_patterns_and_car_ownership.pdf)

<sup>14</sup> <https://www.cso.ie/en/releasesandpublications/ep/p-eii/eii19/transport/>

<sup>15</sup> <https://www.rte.ie/brainstorm/2019/0920/1077145-irish-women-driving-to-work-cars/>

There is a huge cost implication and burden to the dominant car culture. Running a car costs €59 per week. This rises to €66 if you are a one parent household.<sup>16</sup> To reverse the trend of increasing dependency and usage of cars, we need creative thinking. In Clare, a Rural Uber type service in the Loop Head peninsula is being piloted, seeing those with cars in rural parts link up with those who have no access to transport, to offer them a lift. This is one of many initiatives that could provide flexibility to serve dispersed populations, citizens with mobility needs, low demand areas and provide local employment.

### **What targets should be set for sustainable mobility?**

- Prioritise the safety of pedestrians and cyclists through reduction in fatalities and accidents.
- A substantial increase in the budget allocation for cycling infrastructure to make it a safer option. 20% of the transport budget for cycling and walking (as recommended by the UN)
- Expansion of the night time services in the Local Link Service.
- Priority investment in rural transport solutions, 2/3 of the capital budget for transport going to public transport and active travel (as recommended by the Citizens' Assembly)<sup>17</sup>
- Gather gender disaggregated data to create a better understanding of how women and men use public transport including women's travel patterns that factor in care journeys, time poverty and women's experience of violence in the public domain.
- Consultations should be designed to actively seek engagement with women and capture their views.<sup>18</sup>

### **How can we deliver value for money for the taxpayer?**

We must ensure that we are considering the impact of low investment or no investment in public transport and active travel and the consequences for women's economic, social and public participation. The value must be measured in how this investment will facilitate access to the labour market, healthcare and education infrastructure as

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<sup>16</sup> [https://www.budgeting.ie/download/pdf/mesl\\_2019\\_update\\_report.pdf](https://www.budgeting.ie/download/pdf/mesl_2019_update_report.pdf)

<sup>17</sup> <https://www.citizensassembly.ie/en/how-the-state-can-make-ireland-a-leader-in-tackling-climate-change/>

<sup>18</sup> <https://www.londonreconnections.com/2019/mind-the-gender-gap-the-hidden-data-gap-in-transport/>

well as to other services and infrastructures necessary for improving the welfare of individuals and households.

In terms of the implementation of the issue of gender into its environmental and climate change policies, a state should incorporate 'gender-responsive budgeting into climate finance'.<sup>19</sup> This focus on 'gender-responsive budgeting' is clearly becoming a central concern as a method of incorporating gender equality concerns within the process of creation of climate change policies. There is an opportunity now in the Equality Budgeting initiative led by the Department of Public Expenditure and Reform to include an objective on sustainable mobility ensuring that investment benefits women and men equally.<sup>20</sup>

## **How can we encourage people to make cleaner and greener choices in transport decisions?**

### Ensure safety for Women

Sustainable mobility must include the promotion of shared and collective forms of transport. For walking, cycling and public transport to be safe and viable options for women, girls and others, the issues of street harassment and perceptions of safety need to be given fuller consideration.

In recent years, projects such as 'Hollerback' and the 'Everyday Sexism' project have illuminated the proliferation of instances of street harassment, sexual harassment and often unconsciously or unexamined gendered behaviour in the public realm. Such behaviours include "manspreading", cat-calling, sexual harassment and assault. Their impact on women in particular requires attention.

Deeper examination of these behaviours show that they have a real, substantive and often prohibitive impact on how, and even if, women and girls access public space.

In the book, *The Right Amount of Panic: How Women Trade Freedom for Safety*, F. Vera Gray interrogates the paradox whereby women are more inclined to fear for their safety in public spaces and yet they are less likely to experience violence in public

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<sup>19</sup> UNFCCC, 'Report of the Conference of the Parties on its Twenty-third Session, held in Bonn from 6 to 18 November 2017', FCCC/CP/2017/11/Add.1.

<sup>20</sup> <https://www.gov.ie/en/policy-information/aec432-equality-budgeting/#pilot-programme>

than men.<sup>21</sup> The author's core thesis is that the reasons for this paradox - which is often made invisible or unconscious even to those who partake in it - is the amount of "safety work" which women do to avoid danger in the public realm.

Avoiding dark places, avoiding walking home late at night or alone, avoiding sitting on the top deck of the bus at night, pretending to be on the phone if they are approached by someone are all examples given of how women behave in public in order to minimise risk.

According to the World Bank, approximately 80% of women worldwide are afraid of being harassed in public spaces. Plan International examined this in the Irish context in a survey which: "examined how women perceive the world around them and how a fear of harassment prevents them from going about their daily lives"<sup>22</sup>. Some of the report's key findings on the experiences of women in Ireland include:

- Nine in 10 women feel unsafe in Ireland just because of their gender
- More than one-third have experienced physical harassment in public

A 2015 report of women's experiences using public space in Dublin by Jackie Bourke sheds light on the impact of sexual and street harassment determining how women and girls in Dublin choose to navigate public space and use public transport, often making the decision to limit their freedom by avoiding entire areas where they stated that they don't feel safe<sup>23</sup>.

Personal safety is a key determinant and factor in the choice's women make, when it comes to modes of transport and how we move throughout the day. Women must be able to access public transport without fear of violence or intimidation. Women are more vulnerable to violence when using other forms of transportation. The impact that fear has on women and girls using active travel after dark must be considered and how that mitigates against women making the transition to more environmentally friendly modes of travel. Public lighting can have a huge part to play. Women and

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<sup>21</sup> Vera Gray, F. 2018. *The Right Amount of Panic: How Women Trade Freedom for Safety*. Bristol: Policy Press, 18 July 2018.

<sup>22</sup> McNamee, G. 2018. 'It's a stark reality': Vast majority of women in Ireland feel vulnerable because of their gender. *TheJournal.ie*, 11 October 2018. Available at: <https://www.thejournal.ie/ireland-women-safety-harassment-4278340-Oct2018/#comments>

<sup>23</sup> Bourke, J., Lalor, K., & Cuffe, C. (2015). *Report of Scoping Study for Dublin City Council Safe City Programme Challenging sexual harassment and other forms of sexual violence in public*. Dublin: Dublin City Council, 2015. Available at: <https://arrow.tudublin.ie/cgi/viewcontent.cgi?article=1032&context=aaschsslrep>

girls continue to adjust their behaviour to avoid feeling unsafe, this can include taking longer journeys or travelling with others.

An Taisce, highlighted the barriers girls experience when they cycle to school. Fewer than one in 250 teenage girls in Ireland cycle to school each day, and the ones who do cycle say verbal harassment from boys and men is a top deterrent.<sup>24</sup> Green-Schools said that for Ireland to move towards becoming a carbon neutral economy, and to develop sustainable transport, cycling needs to become a viable option for everyday journeys for everyone.

Services must consider the quality, safety and comfort required by women, disabled people, older people and children. An underinvested public transport infrastructure is constraining independence and choice.

Some European countries, in their efforts to mainstream gender into transport have implemented measures directed at improving the safety of the transport system, accounting for women's specific safety needs. A few of those measures included removing bushes and shrubbery adjacent to bus stops; eliminating dark access ways to bus stops; introducing special taxis for women and women-dedicated park areas; training transport professionals to deal with sexual harassment in transport and others.<sup>25</sup>

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<sup>24</sup> <https://www.rte.ie/news/2019/0918/1076789-girls-cycling/>

<sup>25</sup> <https://eige.europa.eu/gender-mainstreaming/policy-areas/transport#practicalexamplesofgendermainstreamingintransport>

## **How can we further enhance the quality, reliability, safety and integration of sustainable mobility services?**

### Promoting Cycling

The inherent health benefits of active travel have been evidenced through research and studies for many decades now. Active commuting is significantly and independently associated with reduced BMI and percentage body fat for men and women<sup>26</sup>. The strongest associations are seen for people who commuted via bicycle, compared to those who use a car. Commuting by bike has also been demonstrated to lower the risk of dying from cardiovascular disease by 52% and by cancer by 40%. After cycling, walking to work is associated with the greatest reduction in BMI and percentage body fat, while commuters who only use public transport also have lower BMI compared to car-users<sup>27</sup>. The potentially wider benefits to Ireland's already overburdened health system are equally great<sup>28</sup>.

Moreover, people with physical disabilities can benefit greatly from active travel and the use of pedal cycles - including bicycles and e-bicycles - as accessible modes of transport and mobility aids. Cycling is social, affordable to many, and accessible to all ages - from the very young to the very elderly. An additional benefit to cycling is the ease with which it can be incorporated into daily routines - such as commuting - or leisure time.

Women are often regarded as an "indicator species" - indicating levels of safe cycling provision; the paucity of women cycling on Irish streets indicates how unsafe cycling is perceived to be in Ireland. When a high proportion of those cycling are women and girls, it is generally reflective of a safe built environment and respectful road culture.

The Netherlands has an extensive network of protected cycle lanes and a bicycle and pedestrian priority road culture which results in 55% of cyclists being women. The gender gap in cycling is not inevitable; it is not a phenomenon worldwide. In Denmark, and Germany, women and girls represent close to, or more than, half of the cycling

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<sup>26</sup> Flint, E and Cummins, S. 2016. Active commuting and obesity in mid-life: cross-sectional, observational evidence from UK Biobank. *The Lancet Diabetes & Endocrinology*, Vol. 4, No. 5, 420-435, 1 MAY 2016. Available at: [https://www.thelancet.com/journals/landia/article/PIIS2213-8587\(16\)00053-X/fulltext](https://www.thelancet.com/journals/landia/article/PIIS2213-8587(16)00053-X/fulltext)

<sup>27</sup> *Ibid.*

<sup>28</sup> Fishman, E., et al. 2015. Dutch Cycling: Quantifying the Health and Related Economic Benefits. *Am J Public Health*. 2015 August; 105(8): e13–e15. Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4504332/>

population<sup>29</sup>. The most significant factors affecting this appears to be the presence of segregated safe cycling infrastructure and other cultural factors in how people use the roads e.g. the level of aggression, speeding etc.

In Ireland, while the total number of commuting cyclists in Ireland is now exceeding the number in 1986, the proportion of women cycling has dropped significantly. This is a stark growth in inequality and mobility, particularly when considered in the context of women's increased participation in the formal labour force over that time. The 2016 census shows heavily gendered patterns in certain modes of transport. Regarding the promotion of sustainable travel, the gender gap in cycling for commuting purposes (both work and school) should be of significant note - averaging 27% women across the country. For young people and schoolchildren, fewer than 700 girls cycle to school and proportionally there is 1 girl for every 9 boys cycling. According to Census data, in 1996 one in four students who cycled to school were women. By 2002, that proportion had fallen to just one in ten and that imbalance has not changed since then. This points to shortcomings in current strategies in accounting for gender differences in the experience of cycling - both perceptions of safety and experiences on the roads - this area merits a great deal more attention.

For those women who do cycle in Ireland, recent media coverage points to a range of challenges, from the complexity of measuring risk on routes,<sup>30</sup> to everyday gendered harassment and abuse.<sup>31</sup>

A major obstacle to cycling, which has been documented in several studies, is the fear of danger - 'close passes' or near misses account for a third of threatening encounters people who cycle have with motorists<sup>32</sup>. This presents a significant barrier for people

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<sup>29</sup> Slavin, T. 2015. 'If there aren't as many women cycling as men ... you need better infrastructure'. *The Guardian*, 9 July 2015. Available at: <https://www.theguardian.com/cities/2015/jul/09/women-cycling-infrastructure-cyclists-killed-female>

<sup>30</sup> Horner, J. 2019. 'I refuse not to feel safe': How women feel about cycling in Dublin. *TheJournal.ie*, 26 June 2019. Available at: <https://www.thejournal.ie/readme/cycling-in-ireland-dublin-data-4698280-Jun2019/>

<sup>31</sup> Williams, L. 2019. Harassment adds more danger for women cycling in Dublin. *The Irish Times*, 25 November 2019. Available at: <https://www.irishtimes.com/opinion/harassment-adds-more-danger-for-women-cycling-in-dublin-1.4093485>

<sup>32</sup> See, for example: Aldred, R., et al. 2015. *Cycling Near Misses: Findings from year one of the Near Miss Project*. The Near Miss Project/University of Westminster, 2015. Available at: <http://www.nearmiss.bike/wp-content/uploads/2014/12/Nearmissreport-final-web-2.pdf> (Accessed 30 January 2018); Aldred, R, and Croweller, S. 2015. Investigating the rates and impacts of near misses and related incidents among UK cyclists.

new to cycling, or who cycle at a slower pace (less than 8mph). The research findings show that close passes are particularly a problem for women, who on average cycle more slowly than men, and experienced a 50 per cent higher rate of close passes<sup>33</sup>.

Research shows that women are generally more risk-averse than men when it comes to cycling, so that if there is a lack of safe cycling networks, this excludes women more than men. It also excludes younger and older people, and some people with physical disabilities, who can often find it easier to cycle longer distances than to walk. It also excludes people who can't afford a car or public transport, but who could afford a bike.<sup>34</sup>

CSO data from the 2016 census shows that non-Irish nationals accounted for 27% of all cycling commuters although they made up only 15% of the commuting working population.

For migrants, the vulnerability of cycling on the roads is compounded by the risk of racism and the demands of precarious work. This was highlighted by protests by those working as bike couriers in late 2018 after a series of violent and racist attacks experienced while people were cycling for work. Bike couriers are often expected to be available outside of normal working hours and to cycle through extreme weather conditions where others might find it safer to opt for an alternative means of travel. The provision of safe infrastructure and a less toxic road culture would be of particular benefit to these vulnerable groups.

Those coming from outside of the EU or other Western countries will not have their driving licences automatically recognised in Ireland leaving many largely dependent on public transport and walking and cycling when they initially arrive. Some are obliged to undertake the full 12 driving lessons before taking the driving test which adds

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*Journal of Transport and Health*, Vol 2, 2015, pp 379-393. Available at: <https://www.sciencedirect.com/science/article/pii/S2214140515002236>

<sup>33</sup> *Ibid.*

<sup>34</sup> O'Connell, J. 2020. Cycling to work shouldn't feel like going to war but I still get flashbacks from being hit by car. *Noteworthy.ie*, 12 February 2020. Available at: <https://www.thejournal.ie/readme/cycling-dublin-collision-cycling-networks-5002215-Feb2020/>



another significant financial barrier. Different cultural attitudes may also affect how accessible cycling is for some - particularly women and girls.

### Promoting Walking

To promote walking as a safe means of mobility, attention must equally be given to the quality and maintenance of the footpaths. In rural areas, there are many roads where no safe walking infrastructure is provided, resulting in limited options for those who wish to move on foot or need to use the footpath to access bus stops. While in urban areas, footpaths are far more common but often poorly maintained and cluttered with a combination of street furniture/litter and often illegally parked vehicles.

During particularly cold weather, the footpaths and cycle lanes are rarely targeted for salting in the way the roadways are. These combined factors have the effect of making the paths hazardous to everyone, with particular risks for those with additional vulnerabilities, and perpetuate a cycle of car dependency.

In Sweden, following a process of “gender-balanced budgeting,” local authorities changed the ways in which roads were snow-ploughed: first, they prioritised clearing walkways and bike paths, especially those near bus stops, primary schools and child care centres; next, they clear side roads and local roads; and then, finally, primary roads and commuting routes. These simple changes resulting dramatic reductions in injuries, particularly among women who were more likely to be walking or using residential streets<sup>35</sup>.

### Promoting Public Transport

Women and men have different mobility needs and patterns, yet transport policies for most countries remain unrelentingly gender-blind. The differences experienced by

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<sup>35</sup> SKR Jämställdhet. 2014. Sustainable Gender Equality: a film about gender mainstreaming in practice. SKR Jämställdhet/YouTube, 9 June 2014. Available at: <https://www.youtube.com/watch?v=udSjBbGwJEg>; Schmitt, A. 2018. Why Sweden Clears Snow-Covered Walkways Before Roads. *StreetsBlog.org*, 24 January 2018. Available at: <https://usa.streetsblog.org/2018/01/24/why-sweden-clears-walkways-before-roads/>; 99 Per Cent Invisible podcast, Episode 363: ‘Invisible Women’, 23 July 2019. Available at: <https://99percentinvisible.org/episode/invisible-women/>

women in using transport can be attributed to entrenched gendered power hierarchies in society and a failure to design for these in public planning:

*“[...] women are more likely than men to have extra domestic and care-giving responsibilities, but fewer transport options. This affects their travel patterns. Women are more likely to move between multiple destinations throughout their daily commute.”<sup>36</sup>*

*“Gendered inequalities in transport use open a myriad of additional concerns. For women, this includes a disproportionate fear of victimisation in public transport spaces.”<sup>37</sup>*

The 2018 Plan International survey revealed that almost six in ten women (58%) often or sometimes feel unsafe taking the bus, showing that the issues of harassment and intimidation must be factored into public transport planning in order to effectively meet the needs of women and girls.

Official census figures show that over 70% of women in Ireland travel by private car.<sup>38</sup> In the context of Dublin, “women are 1.6 times more likely to choose a train over a private vehicle compared to men, but they are 1.3 times less likely to take a bus, or to walk or bicycle.”<sup>39</sup>

The OECD’s International Transport Forum (ITF) has reported the following policy insights, based on research from several global cities, including Dublin:

- Public transport scheduling needs to consider a wider range of needs and preferences;
- Gender analysis leads to effective and efficient transport demand management; and
- Safety improvements are key to ensure optimal public transport use for women.

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<sup>36</sup> Kalms, N. and Korsmeyer, H. 2017. Gender makes a world of difference for safety on public transport. *The Conversation*, 17 July 2017. Available at: <https://theconversation.com/gender-makes-a-world-of-difference-for-safety-on-public-transport-80313>; Ng, W. and Acker, A. 2018. Understanding Urban Travel Behaviour by Gender for Efficient and Equitable Transport Policies. OECD: International Transport Forum (ITF), Discussion Paper 2018-01, February 2018. Available at: <https://www.itf-oecd.org/sites/default/files/docs/urban-travel-behaviour-gender.pdf>

<sup>37</sup> Kalms, N. and Korsmeyer, H. 2017, *op cit*.

<sup>38</sup> CSO. 2016. Distribution of journeys by mode of travel and gender. Central Statistics Office, *National Travel Survey 2016: How We Travelled*. <https://www.cso.ie/en/releasesandpublications/ep/p-nts/nts2016/hwt/>

<sup>39</sup> Ng, W. and Acker, A. 2018, *op cit*.

The ITF has also found from its research that “flexible modes [of transport] could attract more female than male users and when given better alternatives, women may be ready to give up driving altogether.”<sup>40</sup>

*“If cities want to further encourage the development of such flexible modes, policies that will address women users’ preferences should be implemented as women will be the dominating users. Similarly, although women prefer to use public transport modes more than men, most of the cities included in this study do not have transport programmes or policies that are focused on improving the user experience of women transit riders considering their off-peak time of travel and non-commute trip purpose.”<sup>41</sup>*

### Disability and Active Travel

Providing a transport system that works for everyone means providing a system that works for people with disabilities. While it is essential that public transport networks are designed with multiple levels of ability in mind, it is also essential that active travel options are accessible for all abilities.

Footpath quality and maintenance is important to everyone who uses public space. For those who are older, with disabilities or navigating with young children and buggies, it is particularly important and can make a significant impact on a person's ability to exercise their right to engage in their community and use the amenities and facilities that should be accessible to them. It is worth noting that Dublin City Council paid out €1.2 million in compensation for footpath trips last year, reflecting the poor quality of the paving.

TCD’s Healthy Trinity initiative recently highlighted that cycling can be an appropriate option for those with certain visual impairments for whom driving and public transport can be prohibitive<sup>42</sup>. The organisation Wheels for Wellbeing in the UK also works to lobby for cycling infrastructure to be provided that is safe and accessible to those for whom pedal power vehicles (whether hand or foot) are accessibility aids. Mental health and isolation can be some of the biggest challenges to those with disabilities and

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<sup>40</sup> *Ibid.*

<sup>41</sup> *Ibid.*

<sup>42</sup> Healthy Trinity. 2020. *Cycling is Inclusive*. Trinity College Dublin Health Promotion Unit/Facebook, 17 February 2020. Available at: <https://www.facebook.com/TrinityHealthPromotion/videos/2602889356646006/>

making active travel as widely accessible as possible can be a significant and positive way to challenge that.

### **How can technology shape future sustainable mobility provision?**

It certainly is key in providing up to date information for Local Link users. It has also been employed on buses with CCTV. However, safety is a concern when waiting at bus stops or train platforms so there are opportunities there to explore technological solutions to ensure women feel safe while waiting to use public transport. Real time information is a great advance in this area. An increased physical garda presence on public transport would also protect women.

### **What other opportunities and challenges do we need to consider?**

We must consider that mobility is experienced differently by women and men due to their life experiences.

We need more representation of women in the decision-making process in the transport sector. We must include the voices and experiences of women in the planning and delivery of public transport in local communities. NWCI highlights that effective climate action will require the strong local participatory democracy and development, which local women's organisations can enable women to participate in at all levels of planning and policy development.

Women are more likely to work part time, they travel at more off peak times than men. Women are more concerned with public safety when using public transport so this must be considered at all planning and budgetary stages. The lack of availability of transport systems combined with time poverty determine how women will travel and places different burdens on women who predominantly take the share of unpaid care work and household tasks. It is essential that we consider the accessibility of bus stops so that people with mobility needs can access public transport services.

Mobility challenges are often exacerbated by income inequality. Lower income neighbourhoods can be more likely to suffer a lack of access to public transport or poor-quality routes to their homes or workplaces as well as a relatively high cost of public transport, especially for rural areas. Investing in cycling routes and

programming to support cycling has the potential to overcome some of these barriers, enabling people in lower income households to access jobs, education and other services. Safe, reliable public transport routes can also overcome some of these barriers.

Transport is an important pillar of social inclusion and enhancer of economic and social well-being. Cycling can allow people to be healthier, while a strong network of public transport can allow for greater social connectedness and autonomy, with a particular benefit to women living on lower incomes. There is a strong connection between social inclusion and health; sustainable mobility holds the key to connecting these two issues, enabling women and minority groups to practice physical and mental health and wellbeing as well as being able to see through their right to make choices regarding work, education and social networking opportunities.

In terms of ensuring access to cycling for all, it is worth noting that schemes like the bike-to-work scheme benefit high earners with a marginal rate tax break; this means the scheme disproportionately advantages men who earn a middle- or high-income salary over lower wage employees, students, retired people or those who are working primarily in the home.

Women deserve to access public services such as mental health or domestic violence services with dignity and confidentiality. This is not always possible in rural communities if you are dependent on others for lifts and transport and it can prohibit reporting domestic abuse.<sup>43</sup> Additional transport costs to socialising with friends and family can cause isolation and compound the situation for women experiencing domestic violence and for services working to support women.

### **What our Members are telling us: Impact of poor public transport on women in rural communities**

Longford Womens Link's Domestic Violence Service (LWLDVS) provides supports to over 300 women every year and these figures are increasing year on year. During 2019, LWLDVS supported 331 women 2 men and 37 children and young people.

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<sup>43</sup> <https://www.longfordleader.ie/news/local-news/506998/rurality-is-a-key-weapon-of-domestic-violence.html>

LWLDVS provide a wide range of supports for women and children including 1:1 Support, Group support, Court accompaniment and advocacy. In 2020, a key area of concern for this rural service is the issue of Rural Transport. In 2019, LWLDVS assisted 43 women with transport to crisis supports which amounted to 201 journeys to and from appointments including court, solicitors and viewing properties. This is a critical element of LWLDVS support, given the lack of accessible rural transport options in the region, and needs consistent resourcing.

The combination of transport and childcare costs can prove too costly for women participating in the labour market. Longford Womens Link has reported that public transport options do not coincide with crèche/school times to support women wishing to access education and employment. As with many rural service providers, 75% of their service users live outside Longford Town. Only three main locations are served by some form of daily public transport. For every 10km of travel, the likelihood that individuals participate in higher education decreases by 2.7% - Student living 50km from Higher Education Institutions are 13.5% less likely to take up a course.<sup>44</sup> The ability to get to a training location was six times more likely to be an issue for people in border regions, than for people living in Dublin.<sup>45</sup> The average distance to most everyday services at least three times longer for rural dwellers vs urban dwellers. The average distance for the supermarket, pharmacy and a GP is about seven times longer for rural households. There is a need for ambitious action to develop a more diverse and inclusive transport infrastructure. Ensuring connectivity for onward journeys to enable passengers to access education and employment is critical as investment increases.

Many of our members are based in rural communities. They shared with us the realities that decades of underinvestment in public transport has meant for them. In North Cork, one group shared their frustrations for the women that don't drive, coupled with inadequate public transport makes it difficult for women to progress. A Bus Eireann service operates from Newmarket to Mallow with 3 services leaving Newmarket a day 7.00am, 10.10a.m and 1.40pm. Even if women were to get to Newmarket for these

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<sup>44</sup> J.Cullinan et al, 2013

<sup>45</sup>Central Statistics Office. Adult Education Survey 2017.

services, the first service misses the early train to Cork so it's not a solution for those wishing to access third level education.

One woman said *"If you don't drive, have access to a car, it can be difficult to go to that evening course you would like to do, get together with people or to get to a job"*.

A women's group in West Cork shared with us the importance of transport *"the freedom, flexibility and safe access to transport provided cannot be underestimated"*

When considering the impact of public transportation and mobility of citizens, we must be aware of the impact that the lack of available and affordable public transportation has on adult learners across the country. In 2017 and 2018 AONTAS, The National Adult Learning Organisation spoke with 849 adult learners across the country as part of the National Further Education and Training Learner Forum, a research project funded by SOLAS. Through this research AONTAS heard from learners that the availability of affordable and available transportation had a financial impact on their ability to meaningfully participate in their education. These issues of availability and affordability are particularly pronounced in rural parts of the country.<sup>46</sup> The current cost of public transport can be prohibitive when you combine it with the cost of childcare. Women on low incomes and job seekers do not have an entitlement to a bus pass and for many who have a bus pass, this would require a service that could be availed of when and where it is needed.

## **Conclusion**

Supported by empirical evidence and research, this submission has highlighted the specific needs of women in the context of sustainable mobility, and calls for urgent action to incorporate an equality and gender analysis within transport and mobility policy in Ireland.

We remain concerned that transport facilities and active travel options fall short of an inclusive approach, which neglects the needs of groups including women, ethnic minorities, and people with disabilities.

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<sup>46</sup> The 2017 National Further Education and Training Learner Forum Advisory Report [https://www.aontas.com/48390-AONTAS%20NALF%20Policy%20Report\\_August\\_2019.pdf](https://www.aontas.com/48390-AONTAS%20NALF%20Policy%20Report_August_2019.pdf); and the 2018 Learner Report <https://www.aontas.com/assets/resources/Annual-Reports/2018FOR%20WEBSITE%20Learner%20Report%20-%20FINAL.pdf>

If Ireland is to build a sustainable mobility system, it must be one which is inclusive and where everyone is comfortable and safe travelling to and from work, schools, college, creches, shops and leisure. This crisis is an opportunity to address quality of life and inequality issues particularly in rural communities and for households living on low incomes. We are presented with the possibility of broader social change including achieving full and substantive equality between men and women. It is clear we urgently need to move to a low carbon and more sustainable transport system.

Thus, an inclusive approach must be undertaken, which complies with the statutory Public Sector Duty and which is designed for a range of needs. This approach is underpinned by the United Nations' SSG Goals 5 and 11.

## Recommendations

1. Incorporate the public sector duty in sustainable mobility planning at all levels from policy to construction planning (through expert groups, workshops, monitoring and evaluation etc).
2. Incorporate gender analysis in transport planning and implementation as a matter of urgency, including Bus Connects and its consultative processes which are underway.
3. Identify additional steps to ensure that active travel is a viable option for people with disabilities
4. Create campaigns to tackle street harassment, including sensitising of An Garda Siochana.
5. Extend road-safety campaigning to address aggression of road culture, particularly as directed to more vulnerable users.
6. Commit to the European Commission's Vision Zero road safety campaign with the goal of zero road deaths and adopt a policy of zero tolerance towards road violence, speeding, intimidation and aggression
7. Ensure that certain communities and areas are not further marginalised through planning for sustainable transport by implementing a consultative process with communities at risk of social exclusion.



8. Provide additional funding to local authorities to prioritise maintenance and improvement of footpaths to ensure they are safe and useable by all
9. Ensure that current and future schemes which support sustainable mobility address rather than perpetuate the current inequality of usage e.g. the bike-to-work scheme as a marginal rate tax break provides the greatest support for high-earners but does nothing to support children, students, pensioners and those who are self-employed or working in the home.
10. Provide supports for children, pensioners and carers to access bicycles, e-bikes and cargo bikes to help meet diverse needs
11. Prioritise funding of cycling and walking based on a community social inclusion model as opposed to routes which benefit from tourism but not necessarily ensure social cohesion.
12. Ensure that future research into sustainable mobility incorporates a gender analysis and undertake research into gendered patterns of public transport use in order to respond to women's needs regarding mobility.
13. A study should be conducted into appropriate steps to limit the prevalence of car advertising and sponsorship
14. Increase Ireland's scale of ambition regarding sustainable mobility; many European cities have recently become, or declared an ambition to become, "car-free", including Oslo, Madrid and Ghent. Others, such as Barcelona, are dramatically increasing the number of car-free neighbourhoods. Over-dependency on private cars damages the built environment, the quality of the air, increases the level of CO<sub>2</sub> emissions, causes congestion, damages the mental and physical health of the population and creates a hazardous public realm - particularly for those with additional vulnerabilities. Increasing sustainable mobility is an opportunity to tackle a multitude of other associated environmental, social inclusion and health issues.
15. Tackle car dependency; while car dependency is likely to remain an inevitability for many in rural areas for the foreseeable future, it is conceivable that our urban centres would be car-free within the coming decade. Achieving this requires significantly increased ambition from the central Government and a coordinated approach between the various departments, including health, education and transport and the various bodies with a responsibility for transport - including the NTA, the RSA and city and town councils. Better

integration will also be needed between land use and transport strategies. It must also be done in a manner that is inclusive and provides support and alternatives for those who are currently dependent on cars.

- 16. Implement robust metrics of success:** the factors that we choose to measure success regarding the progress on active and sustainable travel are very important. While Ireland ranks second safest in the EU in terms of road fatalities<sup>47</sup>; this statistic does not account for the rate of injuries, the perception of safety and the sense of enjoyment or comfort using transport and public space. A 2013 Eurostat survey asked respondents to rank their feelings of safety when walking alone at night, resulting in Ireland ranking in the middle of the pack, with men almost twice as likely to report feeling safe than women.<sup>48</sup>

This submission was compiled by the NWCI, with support and input from Louise Williams ([clouisewilliams@gmail.com](mailto:clouisewilliams@gmail.com)), Joan O'Connell ([jmcoconnell@gmail.com](mailto:jmcoconnell@gmail.com)) and Councillor Janet Horner ([janet.horner@greenparty.ie](mailto:janet.horner@greenparty.ie)), who co-ordinate the [Monthly Cycles](#) programme with the [Dublin Cycling Campaign](#). Monthly Cycles organises social cycling for women who cycle or would like to cycle in Dublin in a safe and supportive environment. They aim to support women from different backgrounds to see cycling as a safe and viable option for them to get around the city and to improve the urban environment so to better meet the needs of women and others.

We would also like to acknowledge contributions from our member organisations in this submission; Aontas, Longford Womens and West Clare Family Resource Centre.

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<sup>47</sup> RSA. 2019. Ireland receives EU road safety award for 2019. Road Safety Authority, 19 June 2019. Available at: <https://www.rsa.ie/en/Utility/News/2019/Ireland-receives-EU-road-safety-award-for-2019/>

<sup>48</sup> Eurostat. 2018. Quality of life in Europe - facts and views - economic and physical safety. Eurostat, 28 August 2018. Available at: [https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Archive:Quality\\_of\\_life\\_in\\_Europe\\_-\\_facts\\_and\\_views\\_-\\_economic\\_and\\_physical\\_safety&oldid=400085](https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Archive:Quality_of_life_in_Europe_-_facts_and_views_-_economic_and_physical_safety&oldid=400085)

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