

To the President of the House of Representatives of the States General
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Date: 10th February 2021
Our reference: RLI-2021/241
Cc:

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Subject: Advisory report "Towards an integrated accessibility policy"

Dear Ms Arib,

On 13 October 2020, your House of Representatives requested the Council for the Environment and Infrastructure (the Council) to provide advice on pursuing an integrated accessibility policy. The Council is pleased to present to you herewith its advisory report "Towards an integrated accessibility policy". The report will also be presented to the Minister and State Secretary for Infrastructure and Water Management, the Minister of the Interior and Kingdom Relations and the Chairman of the Senate.

In this report, the Council makes a number of recommendations to government and parliament on how to achieve an integrated, balanced accessibility policy. The three main recommendations are:

- **Aim for broad welfare: as a benchmark throughout the *entire* accessibility policy cycle, including visions and assessment instruments.** The Council recommends to have facilitating mobility no longer as the dominant principle of accessibility policy. A well-considered vision, backed up by political decision-making, is needed to set the goals of accessibility policy and determine how they can best be achieved. As far as the Council is concerned, the impact on broad welfare should be the benchmark throughout the entire policy cycle, from vision development to implementation. This means updating the assessment instruments and the way they are used. The conceptual framework and system of social cost-benefit analyses should be used at an earlier stage and more consistently in decision-making processes. The new national transport market and infrastructure capacity analysis, to be published in the summer of 2021, must take account of all aspects relevant to broad welfare. It is important to prevent this analysis from acquiring the status of a priority list for infrastructural solutions, as has been the case in the past.
- **Take a broad view: on all available solutions for accessibility issues.** The Council calls on government and parliament to include all available solutions in its accessibility policy. Changing social preferences and technological developments make this necessary. Besides "classic" infrastructural measures aimed at tackling traffic capacity problems, other promising solutions, such as influencing behaviour, spreading mobility over time, finding digital accessibility alternatives and encouraging smart spatial design, should be considered as *equivalents* when making policy choices. The rapid development of digital alternatives to physical travel, such as online working from home or education, must be taken into account in



policy without delay, in cooperation with private partners. In addition, national spatial policies should focus more strongly on the impact of urbanisation on accessibility.

- **Adopt a common view: nationwide and with the regions, based on a multi-year programmatic approach and the funding of accessibility policy.** In order to make choices based on a comprehensive assessment, the three ministries involved must view accessibility policy as a joint, coherent challenge at national level: the Ministry of Infrastructure and Water Management (for the mobility theme), the Ministry of Interior and Kingdom Relations (for the urbanisation and spatial design theme) and the Ministry of Economic Affairs and Climate Policy (for the digital accessibility theme). A shared vision and policy agenda is needed to form a basis from which to allocate responsibilities and financial resources for the accessibility policy. The implementation of carefully coordinated urbanisation and accessibility strategies must not be hampered by a sectoral project approach or by the interests of individual organisations. The Council believes that area-specific programme management linked to joint programme funding will form the basis for improving ways of embedding the integrated approach in the collaboration, both nationally and between the national government and the regions. This will also require a broadening of the financial basis for the accessibility policy over the coming period.

Parliament has an important part to play throughout the policy cycle in achieving an integrated accessibility policy. The Council has two specific recommendations:

- **Make more use of the available parliamentary options for influencing policy.** The House can make better use of its options for influencing policy by closely questioning the government and focusing its debate on the comprehensive nature of the principles and proposals for accessibility policy. If required, the House can also play an initiating role, for example by issuing an initiative memorandum. The effective use of these options for influencing policy requires the House to form an opinion about the role that accessibility policy can play in promoting broad welfare. It also requires the House to ensure that the assessment frameworks and decision-making instruments used are properly geared towards making comprehensive assessments.
- **Parliamentary attention should be more focused on the relationship between the impact, possible solutions and the administrative organisation of accessibility policy.** When exercising its monitoring role, the House should focus less on the results of individual projects and measures and concentrate more on the impact and achievement of the goals of accessibility policy as a whole.
This also means: assessing government policy more explicitly in terms of the connections it makes with other relevant substantive policy areas, such as spatial policy, urbanisation and digitalisation, and in terms of cooperation between ministries and tiers of government. The Council believes that a more integrated accessibility policy would also benefit from the regular organisation of joint meetings of the standing committees for Infrastructure and Water Management and Interior and Kingdom Relations.

The Council hopes that this advisory report has provided points of reference for making choices in accessibility policy that are based on comprehensive assessments and wishes the members of the House much wisdom in performing the vital role they have in that process.

Yours sincerely,
Council for the Environment and Infrastructure,



J.J. de Graeff
Chair



Dr. R. Hillebrand
General secretary

Towards an integrated accessibility policy

1. Introduction

There is a growing realisation that an "integrated" approach to accessibility policy is desirable. An integrated approach goes beyond enabling efficient travel by car, bicycle or public transport. This approach is alive to new possibilities and innovations in the field of mobility. Consideration is given to spatial planning solutions and the idea of spreading mobility throughout the day. The policy involves keeping an eye out for digital alternatives to physical travel. An integrated approach also takes account of other issues in the living environment, such as urbanisation, safety and climate.

The House of Representatives has asked the Council for the Environment and Infrastructure (Rli, "the Council") to advise on how to achieve a more integrated approach to the accessibility issue in practice. The questions that the House has put to the Council are¹: What institutional obstacles exist within government organisations and how can these be removed? Are there different obstacles in relation to national, regional and cross-border mobility challenges? How can a comprehensive assessment be guaranteed in the various assessment instruments? How can the House of Representatives exercise leverage in this process?

The Council has summarised these questions in the following request for advice:

How can a more comprehensive assessment of accessibility challenges and solutions be achieved in policymaking? What are the main obstacles that stand in the way of such a comprehensive assessment for institutions in general and the House of Representatives in particular and how can these obstacles be overcome?

The Council believes that the questions from the House of Representatives have come at the right time. Our living environment gives rise to numerous challenges that require a solution. These are challenges that strongly influence each other and that each demand a place when space is in short supply. This requires carefully considered choices in which different perspectives are taken into account. The Council is therefore pleased to advise the House on this matter. The Council aims to provide tools for making choices in accessibility policy that are based on comprehensive assessments and to help the members of the House perform the vital role they have in that process.

About accessibility and mobility

Accessibility and mobility are often mentioned in the same breath. Yet they are different concepts. Accessibility relates to the opportunities that people have to meet each other, to develop activities and to reach their destinations safely. Mobility is one way of doing this, i.e. getting from A to B. It is important to bear in mind the distinction between the two concepts when considering an integrated approach to accessibility policy. The Council will return to this issue in more detail later in this advisory report.

Setting the framework

In this report, the Council presents a line of reasoning on how to achieve a more integrated accessibility policy. While developing this line of reasoning, the Council focused mainly on accessibility issues from the perspective of *people*. Of course, accessibility is also a vital issue when it comes to *goods*. The Council believes that many elements from this line of reasoning, including the accompanying general recommendations, can also be used in an integrated approach to the transport of goods. This requires a "translation" of the line of reasoning into the specific

¹ House of Representatives (2020). *Mobility policy. Letter from the Presidium with a request for advice to the Rli in the context of its knowledge agenda 2020 with regard to mobility and accessibility issues, 8 October 2020*. Session 2020-2021, 31 305, No. 317.

characteristics and challenges of the world of goods transport and logistics. The Council has not made this translation in the context of this report.

In this report, the Council focuses primarily on regional and national accessibility issues and the relationship between them. For the specific assessments involved in cross-border accessibility, the Council refers the House to the recent Rli advisory report on international passenger rail transport.² The principles of an integrated approach as presented in this report do not differ fundamentally in terms of regional, national or cross-border accessibility. They can be applied at all three levels.

Structure of this advisory report

In the next section, the Council introduces three dimensions that are relevant when making comprehensive assessments as part of accessibility policy. The Council also has a number of observations to make on adopting an integrated approach to policy challenges. The Council goes on to analyse the three dimensions, as mentioned above, in separate sections. For each dimension, the Council discusses the obstacles that stand in the way of making comprehensive assessments in accessibility policy. Each section concludes with a number of recommendations. In the final section of this advisory report, the Council addresses several recommendations directly to the House of Representatives.

2. Three dimensions of comprehensive assessment: impact, possible solutions and organisation

There are various aspects involved in making comprehensive assessments of accessibility issues. In this section, the Council addresses three dimensions of the comprehensive assessment of policy, in which various relevant aspects have a logical place:

- comprehensive impact assessment;
- comprehensive assessment of possible solutions;
- comprehensive management and organisation.

We briefly explain these three dimensions below, focusing on policy relating to accessibility.

Comprehensive impact assessment

An integrated approach to accessibility issues requires first of all that the desired policy impacts are identified (in line with the policy goals), how these impacts are related and whether they are mutually compatible.

We may be inclined to believe the desired impact of accessibility policy is an improvement in journey times and the reliability of connections. But policy choices in respect of accessibility also directly affect other aspects which are related to the *living environment*: climate and environment, spatial quality, urbanisation, quality of life and safety. Policy choices in respect of accessibility can also have *social* consequences. Changes in accessibility can, for example, increase or decrease people's opportunities for personal development and participation in society.³ The various societal challenges and the impact of government policy in all these areas influence each other and are not easily reconciled. This requires careful – comprehensive – assessment when developing policy. In Section 3 of this advisory report, the Council elaborates on this dimension of comprehensive assessment in accessibility policy, partly on the basis of the questions from the House of Representatives concerning the use of various assessment instruments.

Comprehensive assessment of possible solutions

Secondly, an integrated approach to accessibility policy requires that all possible solutions for improving accessibility are included in the assessments. The first step is to look beyond the

² Council for the Environment and Infrastructure (2020). *Changing tracks: towards better international passenger transport by train*. The Hague.

³ Council for the Environment and Infrastructure (2020). *Access to the city: how public amenities, housing and transport are key for citizens*. The Hague.

boundaries of the modes of transport and include all of them when approaching the issue. For example, expanding the infrastructure to include different modes of transport (roads, railways, cycle paths, etc.) may be a solution to improve the accessibility of destinations in certain situations.

However, using *existing* infrastructure more efficiently can also be a promising option, for example if the time factor is included in the assessments: at what time of day or on which day of the week is the infrastructure used? From that perspective, flexibilisation of working hours can also be considered as a solution.

An integrated approach could include still more possible solutions as accessibility can also be improved without additional mobility. Physical travel is not always necessary to meet accessibility needs. Digital or virtual accessibility (e.g. through online home working) is a possible alternative. Furthermore, the accessibility challenge can be approached from a spatial planning perspective as *spatial planning* choices can also greatly influence the accessibility of destinations. Good spatial design and smart location choices can bring the functions of housing, work and amenities geographically closer together, thereby helping to improve accessibility.

In Section 4, the Council outlines trends in the various solutions and how they can help make a comprehensive assessment possible.

Comprehensive management and organisation

Finally, an integrated approach to accessibility issues requires effective cooperation between the parties involved. The world of accessibility consists of a large number of organisations: ministries (the Ministry of Infrastructure and Water Management, the Ministry of the Interior and Kingdom Relations, the Ministry of Economic Affairs and Climate Policy), decentralised authorities (provinces, transport regions, municipalities), implementing bodies (the Directorate-General for Public Works and Water Management, ProRail), market players (transport companies, technology suppliers) and social and interest groups (the Royal Dutch Touring Club ANWB, the Cyclists' Union, Rover, etc.). Each of these organisations has its own formal and informal standards, structures, and beliefs. These have been built up over many years, if not decades, and therefore inevitably reflect past choices and solutions. This is also true of the financial and legal frameworks within which they operate. Long-established standards, structures and beliefs can often prevent a comprehensive assessment of the various policy options.

In Section 5, the Council examines this type of institutional obstacle in more detail.

A few observations on comprehensive assessments

The comprehensive assessment of policy options rarely simplifies the policy development process; on the contrary. In the discussions held by the Council during the preparation of this advisory report, there were laments such as: "When you don't want something to get off the ground, you take an integrated approach." Or: "Better is the enemy of good."

The Council recognises that an integrated approach can make things more complicated. A one-dimensional perspective has the seductive advantage of making things simple. Multiple perspectives make the challenge "bigger" in the first instance, so a common "solution" is to demarcate, reduce and simplify. But if policy is to be effective, it is not desirable to make things simpler than they really are. Moreover, social reality takes little notice of policy and/or political "simplifications". Comprehensive assessment serves a real interest: things can go wrong if policy choices are not subjected to comprehensive assessment. Different societal challenges and public values are often at odds. Moreover, if we look at policy challenges in an integrated way, there are opportunities to be grasped. An integrated perspective offers opportunities to find a better, more fruitful and more effective solution.

Yet there are also observations to be made about comprehensive assessment. The Council lists three of them below. We do not mention them to undermine the importance of comprehensive assessment, but as concerns to be taken into account:

- The first observation is that it "can always be more comprehensive". A comprehensive accessibility policy can be regarded as a collection of Russian dolls with labels such as: Modality < Mobility < Accessibility < Sustainable spatial development (including housing, nature, climate, environment) < Sustainable development (including economy, income and

employment) < Broad welfare (including safety, health, education, social cohesion, etc.). A series such as this illustrates the risk that a challenge can become too wide-ranging for a targeted approach. It is therefore important to determine the *relevant* aspects of a challenge and to assess them explicitly and proportionately in the decision-making process. From the point of view of integrality, it is essential to read the series "from right to left". In other words: first determine what is needed in terms of accessibility and mobility to ensure broad welfare, instead of starting "on the left" with mobility issues (traffic congestion) and then considering whether it is possible to contribute to broad welfare on this basis.

- The second observation is that integrated policy should not be an end in itself or a panacea for all policy challenges. Comprehensive assessment is essentially about clarifying the way in which various challenges, goals and solutions are interrelated and then making conscious, explicit and well-founded choices based on that insight – rather than choices that are primarily motivated by ingrained beliefs, generic preferences or sectoral interests.
- The third observation is that making a comprehensive assessment does not automatically lead to an integrated solution. Depending on how different aspects are assessed, a comprehensive assessment may also lead to a sectoral solution. So even with comprehensive policy assessments, there remains a need and scope for working and thinking in terms of sectors, not least during the implementation phase. But only after a comprehensive assessment has been made "up front".

3. Comprehensive impact assessment: from traffic congestion to broad welfare

Default⁴ in current accessibility policy: facilitating mobility

There is currently a strong emphasis on solving traffic congestion when choices are made in accessibility policy. Whether it is a matter of tackling traffic jams or capacity shortages in public transport, eliminating congestion is the starting point. The key idea behind this is that mobility is a human need that should be facilitated as much as possible. This has been a basic principle of national mobility policy since the *National Traffic and Transport Plan 2001-2020* from 2001 and the subsequent *Mobility Memorandum* from 2005. A few quotes from these documents illustrate this point:

"Mobility is allowed. Mobility is part of modern society".⁵

"Reducing mobility is not an option. Mobility is (...) a social need. Mobility is an asset that gives people the opportunity to fulfil themselves and to relax. Fighting against mobility would therefore mean fighting against social needs. That is neither desirable nor effective."⁶

Since the publication of the policy documents referred to here, the need for mobility and facilitating that mobility has been the dominating factor in national accessibility policy. Not so much as a repeatedly confirmed fundamental policy principle, but rather as an implicit starting point for thinking and reasoning about mobility.

Integrated alternative: general welfare as a benchmark for assessing the impact of policy

Facilitating mobility as much as possible as a means of improving accessibility has increasingly clashed with other challenges in the living environment in recent years. This is acknowledged in

⁴ The term "default" is borrowed from Thaler & Sunstein's standard work on influencing behaviour, published in 2009. The default setting literally means the "standard setting". In organisations or policy systems, the default describes the "normal state of affairs", which is the starting point for everyday actions. Directors, managers and employees usually act within that default setting and, in doing so, they implicitly and often unconsciously confirm what the norm is. The Council uses the term here to explain why certain choices are made in accessibility policy and why it is difficult to change them. See Van der Steen, M. & Scherpenisse, J. (2020). *Grenzeloos samenwerken: van A naar B via B*. The Hague: Netherlands School of Public Administration; and Thaler, R.H. & Sunstein, C.R. (2009). *Nudge: improving decisions about health, wealth, and happiness*. New Haven, CT: Oxford University Press.

⁵ Ministry of Transport and Water Management (2001). *National Traffic and Transport Plan 2001-2020; Strategy for mobility in the 21st century*. Session 2000-2001, 27 455, No. 3.

⁶ House of Representatives (2005). *Key Planning Decision, Mobility Memorandum PKB, part III*. Session 2004-2005, 29 644, No. 13.

the most recent government paper on mobility, *Mobility Outline towards 2040*, published in 2019. The ambition in this paper is to achieve a safe, robust and sustainable mobility system with minimal impact on the living environment. The paper takes account of the fact that accessibility issues are becoming more complex and increasingly intertwined. The first few sentences of the paper, however, still reflect the traditional assumption of a demand for mobility that must be met at all costs:

"People want to be able to travel from door to door safely, quickly and easily. (...) That will not change, just the way it happens".⁷

Here we see that although a broader perspective is introduced, this takes the form of an addition to the central premise of facilitating mobility as a proven means of improving accessibility. This does not create a truly integrated policy.

The Council believes that a fundamental political debate is required to arrive at a truly comprehensive assessment of accessibility policy. This debate should focus on the goals of accessibility policy and the possible solutions for achieving these goals. It also includes the question of where the goals of accessibility policy are placed in the hierarchy of societal challenges and the related national targets.

The Council believes that "broad welfare" is a key concept in this context. Broad welfare includes everything that people believe to be of value. In addition to material prosperity in the form of income and consumption, other important aspects are well-being, health, work and leisure time, housing, safety, the environment, participation in society and trust in other people. Moreover, broad welfare is not just about welfare in the "here and now", but also about the welfare of others, such as future generations or people elsewhere on the planet⁸. Broad welfare as a benchmark for making comprehensive assessments in accessibility policy makes the standard by which challenges and solutions can be judged much more fruitful and wide-ranging.

Accessibility policy can make a positive contribution to broad welfare, if it leads to more people being able to participate in society – for example by improving access to jobs and services. But improved accessibility can also be detrimental to broad welfare. One example would be when improved accessibility leads to increased mobility, which in turn leads to higher carbon emissions, more noise pollution, deteriorating air quality or reduced safety. Another example would be when improved accessibility is achieved through the construction of infrastructure at the expense of other aspects of broad welfare, such as recreational facilities, a scenic view or the natural value of contiguous nature reserves. The contribution of accessibility policy to broad welfare also depends on *who* accessibility is being improved for. After all, some accessibility measures do not have an equally beneficial effect on everyone, for example where measures adversely affect the affordability or availability of transport for certain groups in society.

Integrate broad welfare into decision-making information and assessment instruments

Experience has shown that using a different benchmark for assessing policy options will only lead to changes in practice if the instruments and the information provided for making assessments change accordingly. It is therefore important to integrate the benchmark for broad welfare into the primary systems used for decision-making and information gathering. Two important assessment instruments currently used in accessibility policy are the national market and capacity analysis and the social cost-benefit analysis. Below, the Council analyses how the government uses these two instruments in practice. The recommendations at the end of this section address the improvements that can be made.

⁷ Ministry of Infrastructure and Water Management (2019). *Schets Mobiliteit naar 2040: veilig, robuust, duurzaam*. The Hague.

⁸ CBS Statistics Netherlands (2020). *Monitor of broad welfare & sustainable development goals 2020*. The Hague.

National transport market and infrastructure capacity analysis: wrongly used as a political priority list for infrastructural interventions

The national transport market and infrastructure capacity analysis (NMCA) currently plays an important part in the political prioritisation of infrastructural solutions to accessibility issues. The most recent NMCA⁹ provides insights that are in themselves policy-neutral, but focus on just one aspect of accessibility: where are traffic jams or other problems expected in the infrastructure network? The NMCA clearly states that the information on future congestion is only one of the building blocks for accessibility policy. Moreover, the NMCA does not make any indicative statements about solutions to the infrastructural problems identified. Nevertheless, during the previous government's term of office the NMCA was given the status of "priority list for infrastructural interventions". Partly due to the publication date of the NMCA, right before the parliamentary elections, the main problems cited in the document were firmly anchored in the 2017 coalition agreement: "Development of new infrastructure: New investments will be based on the results of the NMCA."¹⁰ The idea that the problems identified in the NMCA should be resolved by constructing new infrastructure therefore acquired great political weight. In the Council's opinion, the government's approach to the NMCA means that this instrument does not contribute to a wide-ranging assessment of potential accessibility solutions but, on the contrary, strengthens the focus on solving traffic congestion.

The Minister has announced a new NMCA, which will be published around summer 2021. This is expected to identify the mobility challenges from a broader perspective. In addition to the capacity and robustness of the infrastructure network, the proximity of jobs and amenities, traffic safety, sustainability and the environment will also form part of the analysis.¹¹

Social cost-benefit analysis: an assessment instrument that is used too late in the process

Social cost-benefit analyses (SCBAs) are another important instrument for assessing policy choices on accessibility. An SCBA shows the impact of a policy proposal on society. Both the direct and the indirect impact of different variants are made clear, so that policymakers and administrators can make an informed decision about which policy variant is preferable.

The SCBA weighting system includes many components that are part of broad welfare. The system therefore has the potential to identify the various aspects of broad welfare that should be included in a comprehensive assessment.

The aim of an SCBA is to express all the impacts of a policy proposal in monetary terms, so that they can be weighed against each other. In practice, it is not (yet) possible to express all the aspects in monetary terms. These impacts are assessed qualitatively or included as "PM items" in an SCBA. These PM items run the risk of fading into the background during the assessment process. This is a matter of concern in terms of the usefulness of SCBAs when comprehensive assessments are made from the perspective of broad welfare.

A second concern is the *timing* of SCBAs during the decision-making process. The MIRT rules¹² mean that during the scoping phase policy is funnelled towards a single preferred administrative solution. A large number of possible solutions are discarded during this process.

The criteria and assessments during this phase are not formalised and therefore depend on the parties who are carrying out the funnel analysis and the client who is directing them. In practice,

⁹ Ministry of Infrastructure and the Environment (2017). [After 2017: Ministry of Infrastructure and Water Management]. *Main report on National Market and Capacity Analysis 2017 (NMCA)*.

¹⁰ VVD, CDA, D66 & ChristenUnie (2017). *Confidence in the future: coalition agreement 2017-2021*. The Hague.

¹¹ House of Representatives (2020). *MIRT Administrative Consultations 25 and 26 November 2020, MIRT progress, motions and undertakings*. Letter from the Ministers of Infrastructure and Water Management and the Interior and Kingdom Relations and the State Secretary of Infrastructure and Water Management to the House of Representatives, 26 November 2020, session 2020-2021, 35 570-A, No. 45.

¹² MIRT: Multi-year Programme for Infrastructure, Spatial Development and Transport. Every year, the MIRT contains the decisions on government projects and programmes which will be used to improve accessibility, safety and spatial planning in the Netherlands. The MIRT rules describe the policy-based process for arriving at a decision, as well as the decision-making requirements at national level for reaching a decision on a possible (full or partial) financial contribution from the national government.

the solutions are often assessed on a narrow set of criteria: the extent to which the (traffic-related) goal has been achieved (will the congestion be resolved?) and the available budget (will the cost of the intervention be acceptable?). Other social aspects are generally not properly considered, if at all, at this stage. As a result, measures that directly address traffic congestion are the most likely to be implemented. Solutions that have a more positive impact from the perspective of broad welfare therefore have a greater chance of being discarded at an early stage. It is precisely during the phase in which a wide-ranging, comprehensive assessment of a variety of possible solutions could still be made when the actual assessment is narrowed down. Only when the preferred solution has been determined does the SCBA enter the picture and several variants of the preferred solution are assessed using a broad set of indicators. At that point there can no longer be any question of effecting a truly comprehensive assessment of policy options.

Recommendation 1. Aim for broad welfare: as a benchmark throughout the *entire* accessibility policy cycle, including visions and assessment instruments

Recommendation 1a. From a broad welfare perspective, determine the extent to which mobility can be facilitated and anchor the results in national strategies for accessibility

Accessibility policy is an inextricable part of the transition towards a sustainable society. The political debate on accessibility should place greater emphasis on this transition as the starting point. Broad welfare provides an appropriate conceptual framework for this. The choices made in accessibility policy should be based on a well-considered vision from a broad welfare perspective. Which social goals must accessibility policy contribute to? What are the possible solutions? What are the limits to the growth of mobility? What are the conditions under which mobility can be facilitated? This vision should be subjected to political debate and decision-making. The results must be anchored not only in sectoral visions on accessibility and mobility, but also in cross-sectoral strategies, such as the National Strategy on Spatial Planning and the Environment (*Nationale Omgevingsvisie*)¹³.

Recommendation 1b. Make broad welfare a benchmark in the assessment instruments used throughout the policy cycle

The Council recommends adapting the assessment instruments and the decision-supporting information they provide so as to make "broad welfare" the benchmark. These adaptations should help to ensure that broad welfare is used consistently throughout the policy cycle. This is necessary:

- up front, while problems are still being identified, objectives and strategies determined and different solutions studied, to be able to make a comprehensive assessment of the impact of various strategies and solutions on accessibility and as well as on other societal challenges in the living environment;
- during the preparation and decision-making phases of specific measures and investment, to be able to choose the solution that contributes most to broad welfare and make timely adjustments or reconsider when the context changes;
- during the post-implementation phase, to be able to monitor and evaluate the accessibility solutions chosen and their impact on broad welfare and therefore contribute to future policy preparation and choices.

Specifically with regard to the role that SCBAs can play as an assessment instrument, the Council recommends:

- commissioning a systematic analysis to ascertain whether broad welfare is reflected in the current system of SCBAs, and to remove any inconsistencies;
- adopting a broad welfare perspective earlier on in the decision-making processes concerning accessibility policy and investment, and using SCBAs at area or programme level to that end, so that the effectiveness of different accessibility strategies can be assessed from a broad welfare perspective.

¹³ Ministry of the Interior and Kingdom Relations (2020). *National Strategy on Spatial Planning and the Environment. A sustainable perspective for our living environment*. The Hague.

Recommendation 1c. In the new national market and capacity analysis, present an overview of all accessibility issues

The Council recommends that the new NMCA, which is scheduled for publication in mid-2021, should include an overview of all accessibility issues. This overview must take account of all aspects of accessibility that are relevant from a broad welfare perspective. In addition to traffic capacity issues, these also include proximity, safety, sustainability, affordability and accessibility. The individual parts of the NMCA can be presented in an annex as background to the overview of problems, with the explicit reservation that each annex only addresses some of the mobility issues. In order to seriously achieve the ambition to adopt an integrated approach, *all* aspects must be considered in political and administrative deliberations. This will prevent the capacity problems in the infrastructure network from ultimately becoming the dominating factor in political and administrative deliberations, as was the case with the old-style NMCA.

There are aspects of accessibility, such as carbon emissions, that are less location-specific than traditional traffic congestion. In the Council's opinion, it is important to present these aspects in the new NMCA so that attention is not primarily focused on bottlenecks (and the related range of possible solutions) that can be indicated directly on a map.

Finally, the Council would point out that the traffic models underlying the analyses of future capacity problems do not yet incorporate any permanent changes in mobility behaviour as a result of the coronavirus pandemic. While this in itself is understandable, the Council believes it does mean that in the coming years greater margins of uncertainty will have to be applied when using the results of traffic models as a basis for decisions on new infrastructural interventions.

4. Comprehensive assessment of possible solutions: from modalities to a broad range of options

Defaults in current accessibility policy: infrastructural solutions and "old" ideas

When looking for solutions to accessibility issues, the government often falls back on two "defaults":

- *Focus on infrastructural solutions.* As the Council argued in Section 2, a wide range of solutions is available for tackling accessibility issues, with expansion of the infrastructure being only one of the options. Nevertheless, at present the government is still primarily looking for solutions in that area. This applies to both the road network (building new roads, widening existing roads) and public transport (laying new rail lines, converting conventional rail lines to metro or light rail, upgrading the track safety system).

Although accessibility policy has been focusing more on non-infrastructural solutions (payment according to use, spreading mobility over the day) in recent years, the way in which these kinds of initiatives are formulated in policy confirms the dominance of the standard focus on upgrading infrastructure. Non-infrastructural solutions are often embodied in temporary programmes (such as the *Beter Benutten* [Optimising Use] programme, now terminated), are only assessed in an SCBA as a matter of routine and are then discarded (such as behavioural measures as a solution to congestion on a specific stretch of road) or are so politically sensitive that they are not included in a comprehensive assessment (such as road pricing and rush-hour charging). This standard focus on infrastructure is recognisable both in the financial structure of the policy (the Infrastructure Fund¹⁴) and in the conceptual framework ("bottleneck thinking": placing the emphasis on traffic flow and then looking for solutions at the location where the congestion occurs).

- *Thinking and policy choices from the last century often predominate*
The fact that not all policy options are given equal consideration in assessments of accessibility policy, the Council believes, is consistent with a long tradition in the political and public debate

¹⁴ On 1 January 2021, the Infrastructure Fund was replaced by the Mobility Fund. See also Recommendation 2.

on accessibility. The Council notes that both the public debate and party-political profiling (which are mutually influential) are strongly rooted in the classic distinction between car and public transport as it emerged in the 1970s – including the contrasting views that go with it, such as "If you are in favour of individual freedom, you are in favour of the car" and "If you are in favour of solidarity or the environment, you are in favour of the train or bus". The Council feels that political views of this kind are not at all helpful in the search for integrated solutions to accessibility issues. They are also increasingly losing their significance as a result of changing social preferences and technological trends. These trends are explained below.

Digital solutions: digital alternatives are emerging

Digital alternatives to physical accessibility have long seemed a small-scale development or something for the distant future. However, due to central government's anti-coronavirus measures which came into effect in the spring of 2020, some kinds of digital accessibility have rapidly become commonplace in large parts of society. What was once depicted as a pipedream has now been normal social reality for almost a year. Not everything is going well, but a lot of experience has been gained and lessons have been learned fast. Surveys show that both employers and employees are now positive about online homeworking, even in a post-coronavirus world.¹⁵ Online meetings, working and schooling from home reduces both business and commuter traffic. A range of digital alternatives is also developing in the social and cultural sphere that are attractive to some target groups (e.g. livestreamed concerts or performances). An increasingly digital society is emerging.¹⁶ The Council regards these as trends that will expand the range of accessibility solutions.

Spatial planning solutions: connections possible with the urbanisation challenge

A second alternative to the infrastructural solutions that are currently often the preferred option in accessibility policy is to be found in the spatial planning choices that are made. The population of the Netherlands will increase to 19 million by 2039.¹⁷ More than one million additional homes will be needed by 2035.¹⁸ In combination with the employment locations and amenities that go with it, this constitutes a major urbanisation challenge. The way this challenge is met will have a major impact on accessibility. If an integrated approach is adopted, the urbanisation challenge offers opportunities for increasing accessibility without the need for large-scale construction of new infrastructure. This requires good spatial design and smart location choices, for example building homes in locations that are as favourable as possible in terms of accessibility.

When accessibility solutions are being sought through spatial planning, attention should be paid to the interaction between spatial levels of scale. After all, a comprehensive assessment of the impacts and possible solutions also includes the impact of national and international infrastructure on local spatial quality and accessibility and vice versa. The regional scale level (the daily urban system or the functional urban area) is the link here. From there, it is possible (a) to zoom in on local accessibility issues and (b) to zoom out to national and international connections, including the connections to freight transport corridors.

In various regions, "area-specific accessibility programmes" have been used for a number of years in an attempt to achieve greater coherence between urbanisation and accessibility. National and

¹⁵ An increasing proportion of the Dutch people who are working (full- or part-time) from home as a result of the anti-coronavirus measures, expect to do this more often post-coronavirus. In March/April 2020, this represented only 27% of homeworkers; in June/July it was 45% and in September/October 47%. De Haas, M., Hamersma, M. & Faber, R. (2021). *Thuiswerken tijdens en na de coronacrisis: een overzicht van drie metingen met het Mobiliteitspanel Nederland (MPN)*. The Hague: Netherlands Institute for Transport Policy Analysis.

¹⁶ See also Council for the Environment and Infrastructure (2021). *Digitalisation and the transition towards a sustainable society*. The Hague.

¹⁷ CBS Statistics Netherlands. *Forecast: 19 million inhabitants in 2039*. Accessed on 12 January 2021 via <https://www.cbs.nl/nl-nl/nieuws/2019/51/prognose-19-miljoen-inwoners-in-2039>

¹⁸ House of Representatives (2020). *Direction and choices in national environmental policy (NOVI)*. *Letter to the House of Representatives from the Minister of the Interior and Kingdom Relations*, 23 April 2020. Session 2019-2020, 34 682, No. 48.

regional governments are working together on this. These programmes exist in the Amsterdam Metropolitan Region (Building Accessibility Together), the Rotterdam-The Hague Metropolitan Region (Mobility and Urbanisation) and in the Utrecht Region (U Ned). The intention behind these programmes is certainly good, according to the Council, but they also illustrate how resistant to change current practices are. Policy choices made in the past still play an important role in many urbanisation programmes, for example choices relating to the growth needs of individual municipalities and land already purchased to meet those needs. Limiting future mobility needs was not always the deciding factor in these choices. The fact that the choice of residential and work locations is made at local level and the funding of any necessary infrastructure is often the responsibility of national government does not help. The national government does manage the number of dwellings in each region, but does not set conditions for the impact on accessibility of local urbanisation strategies.

Innovative mobility solutions: opportunities for more efficient and sustainable accessibility

In the field of mobility, many new systems have been developed (or are being developed) in recent years that people can use to travel from A to B quickly and sustainably. For example, there are digital platforms for "smart" car sharing and initiatives such as "Mobility as a Service", where an app provides personalised information on shared cars, public transport, shared bicycles and taxis, including a "book and pay" function. In addition, the era of the self-driving car ("autonomous driving") is fast approaching.

What these innovations have in common is that they can set in motion major changes in the field of mobility. In an earlier advisory report, the Council noted that this is blurring the boundaries between car and public transport and rendering traditional ideas less relevant.¹⁹ Is a shared car individual or collective transport? Traditional oppositions between modes of transport are also disappearing in the area of sustainability, especially when cars are increasingly electrically powered. After all, this reduces the direct environmental impact of car traffic in terms of greenhouse gases, particulates and noise. The nature of the bicycle is also changing thanks to the addition of an electric motor (e.g. consider the role the Speed Pedelec can play over longer distances), which will allow the bicycle to be included more often in comprehensive accessibility assessments.

These innovative mobility solutions offer opportunities to use the capacity of existing modes of transport and infrastructures more efficiently. This can lead to different assessments being made when the choice is between expanding the infrastructure network or investing in making it future-proof – for example, by installing the digital facilities required for smart car-sharing and autonomous driving when roads are being upgraded.

Spreading mobility over time: a promising option that is still underused

Over 90% of road delays occur during peak times. And in public transport, too, trains, buses, trams and metros are only overloaded during the rush hour. When people work, meet, study, etc. online from home for part of the day or the week, the peaks in traffic flow decrease. The *time* factor, just as much as *space*, is a key variable in solving accessibility problems. Spreading traffic over the day or week is happening now (apart from the current atypical situation as a result of the anti-coronavirus measures), mainly based on voluntary agreements with employers and educational establishments about working and studying in places other than the office or educational establishment. Additional, more directive, measures, such as pricing policy, can also help to spread scarce capacity on the road and in public transport.²⁰ In this case, travellers do not "pay" with their waiting time in the rush hour, but pay a charge that can be spent back into accessibility policy. The better the charge is differentiated by time and location, the greater the potential social benefits of the charge. The off-peak fare in public transport is already a good example of this.

¹⁹ Council for the Environment and Infrastructure (2018). *Better and different mobility: investing in mobility for the future*. The Hague.

²⁰ Verrips, A.S. & Hilbers, H.D. (2020). *Kansrijk mobiliteitsbeleid 2020*. The Hague: Netherlands Bureau for Economic Policy Analysis and Netherlands Environmental Assessment Agency.

Recommendation 2. Take a broad view: on all available solutions for accessibility issues

Recommendation 2a. Consider all available policy alternatives as fully-fledged solutions in accessibility policy

The Council calls on the government and parliament to include all available solutions for improving accessibility in policy assessments. When it comes to mobility solutions, in addition to "traditional" infrastructural measures and capacity interventions, serious consideration must be given to influencing behaviour and introducing innovative mobility concepts to reduce physical travel or improve the way it is spread over time. This includes investing to prepare existing infrastructure for innovations in mobility policy. In addition, outside the mobility domain, it is a question of deploying spatial planning solutions, such as smart location choices in urbanisation strategies, and further developing digital alternatives to physical travel.

The Council considers it important to regard these alternative solutions as "equivalents", i.e. as fully-fledged alternatives, and not just as "nice to have". Regarding all possible solutions as equivalents means in any case that all available implementation instruments (from physical investment to influencing behaviour and pricing policy) are fully included in a comprehensive assessment. As a replacement for the Infrastructure Fund, the Mobility Fund provides the opportunities to do so.²¹ Exploiting these opportunities requires a businesslike approach to choosing instruments based on effectiveness – and not on political assumptions from the last century. Also, substantial financial resources from the Mobility Fund will have to be deployed to pay for these non-infrastructural solutions. If these solutions are managed more effectively and with greater financial leeway, the Council expects there to be plenty of scope for improving accessibility via the existing infrastructure network in a relatively cost-effective manner.

Recommendation 2b. Digital accessibility: ascertain what is needed financially, institutionally and in terms of infrastructure to embed digital alternatives permanently in accessibility policy.

The Council regards the experience of digital accessibility gained during the coronavirus pandemic, ranging from home working, meetings and schooling online to digital alternatives in the social and recreational domain, as an excellent opportunity to expand the range of accessibility solutions. Digital forms of accessibility could be a fully-fledged alternative when a comprehensive assessment is being made of different possible solutions. But this will not happen by itself. It requires a substantive exploration of questions such as: what are the conditions that could make digital accessibility a socially accepted and desirable substitute for physical mobility? What does digital accessibility mean for the spatial scale of social and business networks? What impact does online home working have on commuting distances and choice of home and employment locations? What impact does online shopping have on physical transport movements of both people and goods? What options does the government have to stimulate digital accessibility and what does this mean for the organisation of government? The Council recommends embedding digital solutions in accessibility policy in close cooperation between the ministries of Infrastructure and Water Management, the Interior and Kingdom Relations, and Economic Affairs and Climate Policy and in consultation with the private sector and civil-society organisations.

Recommendation 2c. Use the National Strategy on Spatial Planning and the Environment to ensure that the impact on accessibility is given greater emphasis when designating locations for urbanisation

The Council believes that national government, on the basis of its responsibility for good accessibility, should focus more strongly on the impact of urbanisation on accessibility. The National Strategy on Spatial Planning and the Environment (*Nationale Omgevingsvisie*, NOVI) is the government's instrument for achieving this. The NOVI should contain frameworks for regional

²¹ With the creation of the Mobility Fund, the financial compartmentalisation of modes of transport will disappear. The Mobility Fund also offers more opportunities than the Infrastructure Fund to fund measures that increase the efficient use of existing infrastructure. These include behavioural measures such as avoiding rush-hour traffic, the use of alternative means of transport such as bicycles and measures aimed at smart mobility and Mobility as a Service. See also House of Representatives (2020). *Rules on the establishment of a Mobility Fund (Mobility Fund Act). Explanatory Memorandum*. Session 2019-2020, 35 426, No. 3.

urbanisation strategies aimed at minimising the additional demand for mobility arising from urbanisation.

5. Integrated management and organisation: from sectoral projects to integrated programmes

Default in current accessibility policy: sectoral, project-based approach

Government organisations are generally set up to work on a sectoral basis; this also applies to government organisations working on accessibility policy.²² Directors, managers and employees are embedded in sector-specific organisational structures and therefore see sectoral thinking and working confirmed in their immediate environment on a daily basis. Where a particular sector becomes a straitjacket because of its relationship with other sectors, formal or informal support structures are devised to shape these mutual connections. The Study Group on Intergovernmental and Financial Relations²³ recently noted that government bodies often fail to tackle challenges effectively because the existing structures, working methods and instruments are inadequate, particularly where the challenges are complex. Moreover, government organisations regularly use instruments and structures from the past, often unintentionally falling back on ingrained reflexes and patterns that are not conducive to cooperation. The principle of "take responsibility for it or leave it alone" from the period of the National Policy Strategy for Infrastructure and Spatial Planning (*Structuurvisie Infrastructuur en Ruimte, SVIR*)²⁴ is counter-productive when dealing with complex challenges.

The sectoral orientation of accessibility policy is reinforced by the fact that ministers are responsible for managing their departmental budget according to the rules of the Government Accounts Act. These rules cause ministers to focus on achieving their own targets in the budget and being accountable for them. It is difficult to influence and scrutinise matters that transcend the responsibility of a single minister.

This mechanism is evident from the way ministries are organised. The Ministry of Infrastructure and Water Management is still very much organised according to modes of transport. The sectoral approach is also the starting point for cooperation between the Ministry of Infrastructure and Water Management (mobility), the Ministry of the Interior and Kingdom Relations (urbanisation and spatial planning) and the Ministry of Economic Affairs and Climate Policy (digital infrastructure). This leaves a mark on the policy choices that are made. Targets are often set for each sector in terms of the number of homes to be built, the lost vehicle hours to be avoided or the percentage of trains to run on time. This sectoral approach is then often manifested in separate projects, in which the emphasis is on clearly defined results and effects that are closely aligned with the objectives of the sectoral policy area and the directorate or department concerned. "Housing" and "mobility" are brought together at national level in the preparations for the Environment and MIRT administrative consultations, but this does not result in housing locations or the proposed infrastructure actually being fundamentally changed or reconsidered. Both the housing and infrastructure portfolios have their own decision-making processes. Both involve great complexity, many players with different responsibilities, limited financial resources and major uncertainties.

Sectoral project-based approach also affects the vision and strategy development phase

The Council notes that the sectoral project-based approach predominates not only during the implementation phase of accessibility policy, but also in the earlier phases of the policy process, when vision and strategy development are on the agenda. Despite the intention to make a comprehensive assessment during vision and strategy development, the sectoral project-based approach seems to hinder any such intentions from the outset. This is also true of the legal and

²² Van der Steen, M. & Scherpenisse, J. (2020). *Grenzeloos samenwerken: van A naar B via B*. The Hague: Dutch School for Public Administration.

²³ Study Group on Intergovernmental and Financial Relations (2020). *Als één overheid: slagvaardig de toekomst tegemoet!* The Hague.

²⁴ Ministry of Infrastructure and Water Management (2012). *National Policy Strategy for Infrastructure and Spatial Planning; making the Netherlands competitive, accessible, liveable and safe*. The Hague.

financial frameworks that are important during the implementation phase. This has resulted in national strategies that focus primarily on their own sectoral domain and therefore only provide guidance within that domain (such as *Mobility outline towards 2040*,²⁵ *Outlines of Public Transport of the Future by 2040*²⁶, *Future Prospects for Automobility by 2040*²⁷ and the approach to the housing shortage²⁸). Any national strategies transcending domains and sectors developed alongside the aforementioned sectoral strategies tend to lack directive clout. As a result, they make a limited contribution towards actually performing comprehensive assessments is limited. The *National Strategy on Spatial Planning and the Environment*²⁹ is a striking example. The government's focus on good accessibility is only partially implemented as a common challenge for mobility policy and urbanisation policy. In short, the Council regards the sectoral project-based approach as the predominant factor throughout the entire policy and decision-making process – not only among operational officials, but also among departmental policymakers, members of government and members of parliament.

Financial barriers to exploiting the relationship between accessibility policy and urbanisation policy
Building homes in existing urban areas ("urban densification") is generally an attractive strategy from the point of view of accessibility as it brings housing, places of employment and amenities closer together, as a result of which people will mainly travel short distances. However, the funding of inner-city traffic access is a high-cost item for local authorities. In practice, this is one of the obstacles to inner-city densification, in addition to land already purchased for housing and development by municipalities and private companies and the complexity of inner-city area development³⁰.

In principle, the infrastructure needed to develop a new residential area and measures to make it fit for purpose can be paid for from the Mobility Fund (the Infrastructure Fund until 1 January 2021)³¹. These government funds are relatively the largest pot of money available to implement accessibility policy. But even the resources of this fund are ultimately limited. Moreover, an ever-increasing proportion of it is required for management and maintenance. This makes choices (mainly by politicians) inevitable. In policy practice, therefore, government funds for investment in local infrastructure are only available if they demonstrably contribute to the achievement of goals in the main infrastructure network. This is by no means always the case. Moreover, regional/local projects have a minimum project size (currently €122.5 million to €225 million, depending on the location) in order to qualify for government funding.

As a result, from both a sectoral and financial perspective, it is often more attractive for national and regional/local policymakers to opt for out-of-town housing estates located near the trunk road network (national infrastructure). But if this subsequently means that the national government is required to invest additional sums in infrastructure or is at the expense of access to jobs and amenities in the urban area, the social and financial costs may ultimately be much higher. One national interest (main infrastructure) therefore overrides the other national interest (accessible housing in existing urban areas).

²⁵ Ministry of Infrastructure and Water Management (2019). *Schets Mobiliteit naar 2040: veilig, robuust, duurzaam*. The Hague.

²⁶ Ministry of Infrastructure and Water Management (2019). *Contouren toekomstbeeld OV 2040*. The Hague.

²⁷ Ministry of Infrastructure and Water Management (2021). *Toekomstperspectief automobility 2040*. The Hague.

²⁸ House of Representatives (2020). *Voortgang versnelling woningbouw. Letter from the Ministry of the Interior and Kingdom Relations to the House of Representatives of 6 November 2020. Session 2020-2021, 32 847, No. 694.*

²⁹ Ministry of the Interior and Kingdom Relations (2020). *National Strategy on Spatial Planning and the Environment. A sustainable perspective for our living environment*. The Hague.

³⁰ Council for the Environment and Infrastructure (2018). *Accelerating housing production, while maintaining quality*. The Hague.

³¹ House of Representatives (2020). *Rules on the establishment of a Mobility Fund (Mobility Fund Act). Explanatory Memorandum. Session 2019-2020, 35 426, No. 3.*

Added value of programme management for making comprehensive assessments

The Council believes that area-specific programme management can help to achieve comprehensive assessments of accessibility policy. Working with programmes makes it possible to move away from the focus on sectoral projects and the financial compartmentalisation that currently often impedes comprehensive assessments. Within the project-based approach which is characteristic of the current MIRT, projects are often in preparation for many years. As a result, attracting and retaining funding via the MIRT in practice receives more attention than finding the best integrated solution to accessibility issues. An approach based on programmes rather than individual projects is much less prone to this problem.

Programme management allows for a mix of measures (facilitating digital accessibility, influencing behaviour, innovative mobility solutions, spatial interventions) which are easier to navigate, especially if this management is linked to (long-term) programme funding, including in terms of time. This reduces the pressure on decision-making for individual projects and measures can be reconsidered or adjusted if, for example, social developments make this necessary. This provides scope for a comprehensive assessment of the various accessibility solutions.

There is no scope for this in the current area-specific accessibility programmes as decision-making on specific projects arising from the current programmes still takes place as part of the regular MIRT process. This means that, as discussed in Section 3, the exploration phase is funnelled towards a single preferred solution, with the focus generally being on controlling costs and solving infrastructural bottlenecks. This runs the risk of reducing the substantive coherence between the projects in the programme.

The substantive developments outlined in Section 4 also lead to a changing playing field. Digitalisation and innovative mobility solutions are creating a bigger and different role for (mainly new) private players in the area of accessibility. In addition to cooperation between the national government and the regions, this also requires the involvement of private players in the joint programmatic approach.

Recommendation 3. Adopt a common view: nationwide and with the regions, based on a multi-year programmatic approach and funding of accessibility policy.

Recommendation 3a. Work from a shared task-oriented vision and agenda and use this to allocate responsibilities and budgets for the ministries involved

Making comprehensive assessments of a cross-sector issue such as accessibility is very important and will only become more so over the coming period given the many interrelated challenges in the living environment. At least three ministries will play an important part in achieving a more integrated accessibility policy: the Ministry of Infrastructure and Water Management (mobility), the Ministry of the Interior and Kingdom Relations (urbanisation and spatial design) and the Ministry of Economic Affairs and Climate Policy (digital accessibility). But the policies of, for example, the Ministry of Education, Culture and Science (school and education timetables) and the Ministry of Finance (tax reimbursement for commuting expenses) are also relevant. The Council considers it important that the ministries involved view accessibility policy as a common, coherent challenge. Making comprehensively assessed choices at national level should not be hampered by sectoral working methods and the interests of individual ministries. For this reason, the Council believes a new method is needed for assigning responsibilities and allocating financial resources for the accessibility policy. The shared vision and agenda must be the deciding factor here. In order to promote integrated policy and interdepartmental cooperation, it would be advisable, the Council believes, to examine what changes in budget management or the Government Accounts Act could help to achieve this.

Recommendation 3b. Make area-specific programme management the guiding principle in cooperation between national government and the regions in terms of accessibility

The implementation of carefully coordinated urbanisation and accessibility strategies is hampered by a sectoral project-based approach in the implementation phase. The sectoral project-based approach also stands in the way of a comprehensive assessment of various possible solutions. The Council considers area-based programme management, linked to a form of programme funding, to be the main route towards better embedding the integrated approach in cooperation between

national government and the regions in the period ahead. National government and the regions will take joint decisions in the programmes. Funding should come from all tiers of government collectively to enhance reciprocity and commitment. Multi-year programme funding is desirable to enable a flexible response to be made to changing circumstances and therefore to achieve a comprehensive assessment. The Council believes that the programmatic approach can be developed within the existing organisational structures of national government and local authorities.

The Council is confident that an area-specific, programmatic approach will help the government to work more easily across the sectoral structures. It is important to involve private parties in these programmes. In this approach, the national government has the responsibility, based on the national vision and interests, of monitoring cohesion between the area-specific approaches.

Recommendation 3c. Widen the financial basis for an integrated accessibility policy

Task-oriented and programmatic cooperation requires wider-ranging financial foundations for building national accessibility policy. Various solutions are possible in this respect. The Council has previously argued for the creation of an Accessibility Fund (which could also finance spatial planning solutions to accessibility problems) or an Environment Fund (which could contain additional budgets from other departments in the physical domain). An alternative is to create an "Urbanisation Fund" alongside the Mobility Fund, under the responsibility of the Ministry of the Interior and Kingdom Relations. In addition to establishing funds, resources from the regular policy budgets of the ministries involved could also contribute to an integrated accessibility policy. Whichever form is chosen, the key issue for the Council is that more scope must be created for adopting an integrated approach to challenges when financial resources are being spent. The use of financial resources for digital accessibility should also be considered when widening the financial basis for an integrated accessibility policy.

6. Role of the House of Representatives

In this section, the Council focuses specifically on the role of the House of Representatives. The Council first analyses the House's options for contributing to an integrated accessibility policy. The Council then makes a number of observations on the way the House takes up these options in practice. The section concludes with two recommendations.

The House of Representatives can contribute to an integrated accessibility policy both through legislation and by monitoring government policy. The recent passage of the Mobility Fund Act is an example of the former, while the annual MIRT consultations are an example of the latter. As the Council argued earlier in this advisory report, the entire policy cycle, from vision development to implementation, should be more consistently geared towards making comprehensive assessments. In this context, the Council sees opportunities for the House to exercise its monitoring role in particular. These opportunities exist both during the phase in which accessibility policy is being developed (vision and strategy) and during the phase in which this policy is being implemented. During the vision and strategy phase, the House can give its opinion on the content and direction of the policy proposals put forward by the government (national strategies concerning all accessibility-related matters). During the implementation phase, the House can give its opinion on the decision-making concerning specific programmes, projects and measures and their implementation, and the associated investment decisions.

Based on recent MIRT consultations³², the Council has formed a picture of the way in which the House of Representatives contributes to making comprehensive assessments in practice. In the

³² House of Representatives (2020). *Verslag van een notaoverleg, gehouden op 7 december 2020, over MIRT*. Session 2020-2021, 35570-A, No. 44; House of Representatives (2020). *Verslag van een wetgevingsoverleg, gehouden op 10 september 2020, over Wet Mobiliteitsfonds*. Session 2020-2021, 35 426, No. 22; House of Representatives (2020). *Verslag van een algemeen overleg, gehouden op 25 juni 2020, over MIRT*. Session 2019-2020, 35 300 A, No. 115; House of Representatives (2016). *Verslag van een notaoverleg, gehouden op 28 november 2016, over vaststelling van de begrotingsstaat van het Infrastructuurfonds voor het jaar 2017*. Session 2016-2017, 34 550 A, No. 52 and House of

previous sections, the Council has described various "defaults" in accessibility policy and concludes that the House, too, is not always able to avoid this. The Council has two main observations in this respect:

- Firstly, the Council observes that the House also mainly opts for a sectoral project-oriented approach to accessibility issues, linked to solutions for specific traffic pinch points (on both roads and railways). The House usually assesses individual projects on their merits, instead of carrying out a generic assessment of whether programmes, projects and measures are consistent with previously adopted policy (including regional area-specific and environmental agendas) which should underlie them. This focus on projects is not conducive to making the desired comprehensive assessment.
- Secondly, the Council notes that the views in the political debate (including the terms and language used) still often reflect the traditional dividing lines between the various modes of transport ("car" versus "public transport") and possible solutions. As argued above, these dividing lines are rapidly losing relevance as a result of technological and social developments. This observation is about more than a "wrong choice of words". After all, the way in which the House discusses accessibility also creates the climate in which solutions to accessibility challenges are sought. It goes without saying that MPs will want to use language that is in line with the needs and values of their own political supporters. However, the Council believes it could take greater account of the opportunities and requirements of today's world.

In addition to these observations, the Council makes two recommendations to the House of Representatives. The recommendations are aimed at helping MPs to fulfil their own role in making choices in accessibility policy that are based on comprehensive assessments.

Make more use of the available parliamentary options for influencing policy.

The House of Representatives can promote an integrated accessibility policy throughout the policy cycle of vision and strategy development, policy programming and instrumentation all the way to the implementation of specific programmes, projects and measures. As part of its monitoring role, the House can exert an influence on the government's policy principles and proposals and conduct a political debate on them. If required, the House can also play an initiating role, for example by issuing an initiative note. The effective use of these options for influencing policy requires the House to form an opinion on ways that accessibility policy can help to promote broad welfare. It also requires the House to ensure that the assessment frameworks and decision-making instruments used in preparing the decision-making process are "broad" enough to enable a comprehensive assessment to be made.

Parliamentary attention should be more focused on the relationship between the impact, possible solutions and the administrative organisation of accessibility policy.

The Council recommends that, when exercising its monitoring role, the House of Representatives should focus less on the results of individual projects and measures and concentrate more on the impact and achievement of the goals of accessibility policy as a whole.

This requires the House to assess government policy more closely in terms of (or to "reward" it for) making connections with other relevant substantive policy domains such as spatial policy, urbanisation and digitalisation. It also requires the House, when exercising its monitoring role, to pay more attention to the necessary cooperation: horizontally, between ministries, but also vertically, between tiers of government.

It is also important that the House scrutinises the overall nature of the assessments made and the related assessment process. This includes asking questions such as: why has this solution been chosen? How widely has research been conducted and have assessments been made on different aspects of broad welfare? Is the scientific knowledge underlying the policy choices sufficiently broad, including the scientific disciplines relevant to the various possible solutions? Do the key figures used sufficiently reflect changing social preferences and technological developments?

Representatives (2016). *Verslag van een notaoverleg, gehouden op 23 November 2015, over MIRT*. Session 2015-2016, 34 300, No. 58.

Finally, the Council believes that the House's contribution to an integrated accessibility policy would benefit from the regular organisation of joint meetings of the standing committees for the Infrastructure and Water Management and Interior and Kingdom Relations ministries (for example, in the run-up to the Living Environment and MIRT administrative consultations).

APPENDIX Responsibility and acknowledgements

Council for the Environment and Infrastructure

The Council for the Environment and Infrastructure (Rli) is the strategic advisory body for government and parliament within the wide remit of sustainable development of the living environment and infrastructure. The Council is independent and provides solicited and unsolicited advice on long-term issues. By adopting an integrated approach and giving advice at a strategic level, the Council aims to contribute to the deepening and widening of the political and social debate and to the quality of the decision-making process.

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This translated report can be downloaded from www.rli.nl

Publication Rli 2021/3