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NPF Submissions,
Forward Planning Section,
Department of Housing, Planning, Community and Local Government,
Custom House,
Dublin D01 W6X0.

Introduction

As set out in my Submission to the previous draft version of *'Ireland 2040 Our Plan: Draft National Planning Framework'* (NPF) Sacyr is an Irish subsidiary of a global infrastructure provider and operator which is headquartered in Madrid. Sacyr's principle areas of interest are in motorways, rail projects, transport hubs and hospitals. In Ireland, Sacyr is involved in the N6 Galway to Ballinasloe PPP and the Motorway Maintenance and Renewal Contract A ("MMaRC A"). The company also had an involvement in the M50 Upgrade PPP up until 2013. I am personally also President of the Irish Tolling Industry Association ("ITIA") which is an association which represents all the private run toll roads in Ireland.

As in my previous submission the purpose is to share our views and experiences so as to assist and inform implementation of certain National Policy Objectives set out in the NPF. It is important to again make clear Sacyr does not wish in any way to influence the outcome of tender processes that may or may not take place during this implementation.

Before offering our comments on this version I would like to first briefly summarise my previous submission in which the principle points included:

- High quality infrastructure is essential to sustain a prosperous economy
- The importance of significantly more planned inter-modal interoperability
- Inter-urban motorways between all principal centres of this island's population
- Most people and goods will predominantly continue to move in private vehicles

In addition I suggested that because large infrastructure projects take considerable time to deliver a overarching spatial planning framework will help to avoid individual projects, especially of some scale, being considered and developed in isolation from delivering a fit for purpose national intermodal infrastructure.

Of particular concern was the fact, now receiving growing media and public attention, that transport in the Greater Dublin Area (GDA) is at critical cross roads for policy, provision and investment. Key elements of the transport infrastructure are under growing stress from renewed economic and population growth. People are commuting longer both in terms of time and distance and the resulting congestion especially on the M50 is impacting negatively on their quality of life. So it is vital investments in infrastructure effectively future proof against long term growth projections.

Finally in answer to the question what are *the nationally important infrastructure projects for Ireland that require delivery over the next twenty years* Sacyr believed planning must start in 2017 on a cross cutting basis between government Depts, state agencies and local authorities to:

- Develop an ambitious long term plan to comprehensively solve current strategic transport infrastructure needs and provide capacity for significant future growth
- Invest in considerably more public and private transport provision
- Complete a comprehensive all island motorway/dual carriageway network by 2040
- Relieve congestion in the GDA such as to join up the M50 via a tunnel under Dublin Bay, adding a new Outer Orbital Route and improving GDA wide public transport and inter-operability between all of the resulting transport modes
- Deploy 'bid' based systems that incentivise cross-authority/agency working in qualifying for targeted funding
- Create a PPP Project Pipeline that attracts global competition and do so before this era of historically low interest rates, and so costs, comes to an end.

I welcome the fact that a number of these points are included in this version of the NPF.

Response

This submission supports the NPFs high level goals and those Objectives that seek to progress:

- *Improvements in connectivity (that) are achievable and are necessary to boost both competitiveness and quality of life*
- *(Doing so to) target for most people to have no more than a 30-minute commute time to work and for most people and goods to have access to international connections within 90 minutes of their home or work base.*

Sacyr also support the intention that the NPF will be:

- *Aligned with and supported by new and improved investment and governance arrangements.... (that)....ensures alignment across government and establishes firm links between the Planning Framework and long-term capital investment(through) a new, ten-year national investment plan from 2018-27.*
- *(In particular setting) the context for a new, ten-year national investment plan from 2018-27 to ensure alignment across government and establishes firm links between the Planning Framework and long-term capital investment*
- *(Therefore) the reference point for other actors to adhere to and follow for vertical alignment with national level capital spending and regional and local tiers of the planning system.*
- *(And enabling) horizontal alignment across government*
- *(Plus learning) from past experiences to set out a new way forward*

Most encouragingly the NDP continues to adhere to its overarching goal of:

- *Supporting ambitious growth targets to enable all four cities of Cork, Limerick, Galway and Waterford to each grow by at least 50% to 2040 and to enhance their significant potential to become cities of scale.*
- *(And Dublin being planned) to remain at the forefront (of being the Capital and leading city on the island and being successful) in the international competition for mobile, inward investment,*

Indeed drawing on its experience of providing and managing public infrastructure for a wide range of populations and economies, and some considerably larger than this island, Sacyr can confirm that the overall high level strategic goals set out are certainly achievable within the time frame envisaged.

It is certainly important the NPF is inclusive and integrated more broadly in spatial planning decisions throughout Ireland and in the sectors identified. Doing so will certainly be transformational in the long run and support the achievement of its strategic objectives to:

- *Promote convergence in living standards between places.*
- *Improve the quality of places and people's experience of living in them.*
- *Anticipate and influence market forces such as agglomeration and migration.*
- *Encourage scale and concentration of people and economic activity.*
- *Promote economic integration between different places.*
- *Address geographic peripherality through accessibility and connectivity.*

Therefore this submission concentrates on the connectivity that is vital to deliver an effective planning and investment response to the envisaged population and economic growth trends and consequent volume of movement by people and goods.

For ease of consideration the comments provided are confined to those National Policy Objectives that are most directly relevant to Sacyr's knowledge and experience.

Key Future Growth Enablers for Dublin (P53)

Progressing the sustainable development of new greenfield areas for housing, especially those on public transport corridors, such as Adamstown, Cherrywood, Clonburris and Clongriffin.

To be truly inclusive the NPF needs to also plan for the transport needs of those for whom using public transport, even when living along one of the planned corridors, is not a viable choice for most or all of their work social and family related movements.

There are usually compelling, and for many inescapable reasons, why individuals chose, often at considerable personal expense, to purchase and pay for the use of a private car and not use public transport. For example it is sustainable to only use public transport from all of these new greenfield areas (already on the outskirts of the City) if every aspect of the residents lives is served by that transport network (ie jobs, education leisure, medical and other family needs). And as all of these centres are adjacent to the M50 any car journeys they take around and beyond Dublin will add to its existing and congested traffic volumes.

Instead Sacyr experience elsewhere points to a radical approach being needed that plans for intra GDA movement that is supported by comprehensive inter operability between flexible routes and modes of transport that encompass the entire Dublin Metropolitan area and are not predominantly focussed on the urban and especially Centre City areas.

In addition the movement of goods needed by a competitive economy requires a high quality road network with sufficient capacity to not be consistently congested along its main arteries. As the statistics compiled by fellow operators show, the M50 and the motorway routes to/from Dublin are now experiencing this level of congestion. And as there is no plan that will substantially alleviate this congestion it is the many thousands of commuters who have no choice but to use these routes that will continue pay the highest personal cost.

Delivering the key rail projects set out in the Transport Strategy for the Greater Dublin Area including Metro North, DART expansion and the Luas green line link to Metro North.

These two projects on their own are helpful but their coverage is and/or will be limited in a 'whole of GDA' transport needs context. The creation of planned facilities and effective interoperability to make possible the seamless transfer by commuters from rail to other means of public transport that considerably extend the geographic footprint served by these services is also needed as the next point acknowledges

The development of an improved bus-based system, with better orbital connectivity and integration with other transport networks

This is definitely a strategic planning need and connectivity envisaged should include with road transport by private vehicles. Based on its own experience in constructing and operating them Sacyr submits that strategically located transport hubs or nodes, backed up by on line information and booking systems, measurably improves access to and use of the public transport network. Additionally ensuring timely and accurate information on the daily operation of these services that commuters can access on their smart phones helps to ensure they have the confidence they will secure the transport they need at the precise time they have to take it (ie and so don't need to take their car).

As toll roads demonstrate commuters are willing to pay to use the motorway network if the benefits are obvious to them and they will likely view using these hubs in the same way. Technological developments already being commercialised will increase this attraction including for public policies aimed at addressing climate change (eg electric vehicles with software assisted driving that in the recent Budget the Government has begun to encourage motorists to purchase)

When developed these hubs would be integrated into the planned GDA Cycling Network that is currently being developed by the NTA and that will benefit from addressing in more depth interoperability linked to commuter/user needs. This should include those who must use their own car for at least part or all of most of their journeys (such as to bring children to school or sports as well as to travel to/for work across the GDA).

Key Future Growth Enablers for Galway

Provision of a Citywide public transport network, with enhanced accessibility between existing and proposed residential areas and the City Centre, third level institutions and the employment areas to the east of the city.

In many ways Galway provides a very practical example of the opportunity to enhance interoperability by constructing a public transport hub. This could/should be done on the M6 close to Galway and integrated into the proposed public transport network so as to enhance its accessibility for those who journey to and from the City.

To achieve this goal and so be a key growth enabler this hub should also be connected to the Galway City Ring Road and the planned strategic cycleway.

Integrated Spatial and Transport Planning

Choices about how places are planned and designed (spatial' planning) and choices about the delivery of transport infrastructure and services (transport planning) are very dependent on each other, and achieving a close linking of the two can be to their mutual benefit and lead to more coherent outcomes for society.

In Sacyr's experience this accurately summarises the interaction between effective spatial and transport planning. Therefore we encourage the Department to insist on such "close linking".

This thinking underpins some of the arrangements for the National Transport Authority (NTA), which was first established in 2009, and whose purpose is to bring a more focused and integrated approach to the planning and delivery of integrated transport infrastructure and services both on a national basis generally and especially in the Greater Dublin Area (GDA) where the NTA has a more detailed remit.

The present Transport Strategy for the Greater Dublin Area 2016-2035 – which the NTA drew up in fulfilment of this responsibility now provides a framework for the development of transport infrastructure in the GDA over the next two decades.

This NTA plan for transport in the GDA has considerable detail on what its responsibilities require it to focus upon. However there are transport needs beyond this remit. In particular the journeys of people and goods for whom transferring to public transport is not a feasible option including under this plan. There is no data on the size of this need, but it would seem reasonable to propose local in depth research is undertaken to scope what it might be.

Doing so would highlight if there is a risk their numbers are sufficient to challenge the sustainability of the GDAs strategy including to help meet Ireland carbon emission targets and to introduce actions in response to climate change (eg a lot more private electric vehicles using the roads). For example the numbers of both private car journeys and public transport use in the GDA is currently simultaneously increasing, but a considerable volume of journeys remain those taken in private vehicles.

Inter-Urban Roads

Sacyr also welcomes and supports the following NPF objective s for inter-urban journeys:

- *Maintaining the strategic capacity and safety of the national roads network including planning for future capacity enhancements.*
- *Improving average journey times targeting an average interurban speed of 90kph.*
- *Enabling more effective traffic management within and around cities and re-allocation of inner city road-space in favour of bus-based public transport services and walking cycling facilities.*

Empowered rural communities

Sacyr would like to briefly comment on the benefits of the following NPF Objective under Rural Development:

- *Investment in maintaining regional and local roads and strategic road improvement projects in rural areas to ensure access to critical services such as education, healthcare and employment.*

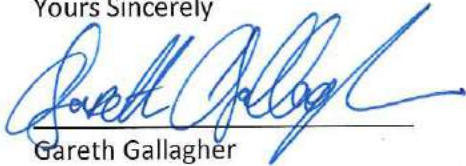
Proper and consistent road maintenance was until recently somewhat of a 'poor relation' when it came to transport planning and investment at the local level. Transport Infrastructure Ireland ("TII") realised this problem and decided to bundle all the non PPP motorways and dual carriageways into three packages and tender them to the market to ensure that they were maintained to the same level as the PPP Projects. These projects have been a huge success.

Conclusion

Being the fastest growing economy in the EU, and the only one with a growing population, is creating as the NPF envisages the need for substantial and urgent investment in core transport connectivity and infrastructure.

The imminent challenge of Brexit means that planning for this 'step up' in the scale and volume of projects to be delivered with the support of the National Investment Plan needs to be started and progressed as an urgent priority.

Yours Sincerely

A handwritten signature in blue ink, appearing to read "Gareth Gallagher", written over a horizontal line.

Gareth Gallagher
Managing Director, Sacyr Concessions Limited