

16th March 2017

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

Introduction

Sacyr is an Irish subsidiary of a global infrastructure provider and operator which is headquartered in Madrid. Sacyr's principle areas of interests 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. We would like to complement the Minister and the Department on the comprehensive detailed and forward focussed thrust of 'Ireland 2040 Our Plan: Issues and Choices'.

The purpose of this submission is to share our views and experiences to help inform the strategic national, along with all-island, choices to be made by Government under the NPF and that this consultation is a key step towards. It is important to indicate that Sacyr does not wish in any way to influence the outcome of tender processes that may or may not take place because of the NPF being implemented. However, this submission does reflect our business and the core competencies, experience and insights we have gained both here in Ireland and around the world on the planning provision and management of strategic infrastructure.

Therefore, this submission concentrates on the areas of transport that we see as the fundamental 'Key Questions' to be answered, based on the population and economic growth trends and consequent motorway usage patterns in the future movement of people and goods. At this point we have prepared a relatively short high level summary of those answers and will contribute further at the next phase of the Department's consultation process.

Response

Strategy

'Where to Next' in Section 6 sets out the correct and proven start point to providing answers to the key question this submission addresses as follows:

- *Identify nationally strategic infrastructural priorities;*
- *Promote the 'packaging' and sequencing of spatially related infrastructural projects on a phased basis to achieve optimal outcomes*
- *Enable greater policy integration and joined up investment decisions across planning, health and transport policy sectors....,*

Sacyr would agree with the principle in Section 6's 'Setting the Bar' that:

6.1.1 High-quality infrastructure is an important element of a modern society and economy. It strengthens economic growth through enhancing efficiency, productivity and competitiveness. It

also underpins social cohesion through providing vital facilities for people in the form of schools, public transport, healthcare and housing.

Indeed, the document itself observes in section 6.1.5 that *joined-up thinking* (i.e. the NPF) *will serve to assist in creating the conditions for new and additional sources of infrastructure funding and delivery. The National Roads programme is an example of successful implementation of an overall strategy, that set out to deliver high quality inter-urban motorways between Dublin and the principal centres of population.*

Sacyr also supports an increased level of inter-modal interoperability that is given no apparent recognition in this document. The most evident example of this is the Luas stop at the Red Cow interchange on the M50 but there are multiple others that are undocumented where individuals themselves have worked out how to use multiple modes to move about using their own car, and a bus train and/or bike in some combination thereof.

Based on this we would question the possible conclusion that regarding provision of additional transport infrastructure capacity the NPF is being developed to promote investment only in providing:

-attractive alternatives to the private car;

At the very least the NPF to be truly successful should recognise that there are attractions, indeed 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 as the toll roads demonstrate they are willing to pay to use the motorway network if the benefits are obvious to them. Technological developments already being commercialised will increase this attraction including for public policies aimed at addressing climate change (e.g. electric vehicles with software assisted driving)

Resilience

Sacyr clearly recognise and appreciate that there has been an increasing concentration of population and economic activity on the eastern seaboard. For example, much of the growth associated with Dublin is being accommodated in ten other counties, extending from Cavan to Wexford. The result is a new economic zone: The Greater Dublin Area ("GDA") and the facts of its expansion and growth are well summarised in the NPF document. The NPF clearly outlines that an underperformance in the GDA region will lead to Ireland underperforming and therefore, looking at how to efficiently address increasingly acute congestion in this area is very important.

At the same time, there is a need as specified in the NPF for regional re-balancing which Sacyr fully supports: So Sacyr cordially submits that in answer to the question '*How might we develop one or more strong regional complements to Dublin that can address their whole city-region, including interactions between settlements*' that an All island motorway network/dual carriageway network should be built. A proposal to complete such a Network is set out in Connected the IBEC/CBI NI JBC All Island Investment Project Report that is also referenced in the Section of the NPF '*Ireland in an All-Island Context*' and which Sacyr is fully supportive of.

We would also believe that this network should be connected to various public transportation hubs around the island. Sacyr's experience in operating these facilities elsewhere is that doing so maximises the benefit to users for whom the hub then becomes an essential support to how they live and work.

Currently while a small number of already planned transport projects have been restarted (e.g. Luas Cross City) transport policy makers have yet to consider, never mind deliver, a response matching that of the late 1990's in scale and scope (i.e. not just meet current but also future demand) which is currently needed.

There are several practical reasons why the current approach won't work and why we welcome the development of the NPF and a long-term strategy. Large infrastructure projects take considerable time to deliver and therefore looking at projects in isolation is not the appropriate way to develop and deliver a fit for purpose national intermodal infrastructure. The island had a European standard public transport infrastructure at the beginning of the 20th century but it does not have one now.

For various reasons, people are commuting longer and longer distances to work especially in and out of Dublin and the congestion issues especially on the M50 are dramatically impacting on people's quality of life. This also has a negative impact on the economy and is becoming a factor in international companies looking to locate here. The traffic levels on the M50 are much higher than expected when it was redeveloped within the last 10 years and therefore it is vitally important that future projects correctly future proof against long term growth projections.

Scope

The key requirement for people when commuting is reliability no matter what mode of transport they use. Therefore, the rapid evolution in technology and service provision in public transport is creating a new 21st century transport paradigm for all parts of Dublin, and indeed the entire island. The NPFs most evident expression of this evolution is its aim to support both the evolution of City Regions and for place making in rural areas.

But to deliver on the NPFs objectives for those who live work and so move about in the GDA, and do so predominantly in a radial pattern around and across the area rather than needing to get in and out of Central Dublin, there must be accelerated delivery of strategic motorway transport arteries already planned to serve their needs.

Adding to this urgent requirement is the fact the predominant movement of goods occurs in the opposite direction: to/from the central location of Dublin Port via the Port Tunnel (and consequently adding to congestion when it arrives on the M50)

The State and indeed the island needs to urgently reverse under investment in infrastructure to stay competitive as a leading centre of European and global enterprise with high quality transport connections for a population that will exceed 8m by mid-century. Goals that could be productively considered for this 21st century transport infrastructure investment that combine both the successful aspects of 'business as usual' and its improvement include:

- Projections of population growth across the island to be ambitious.
- Proactively responding to the practical implications of low rise housing in Dublin City resulting in more people and journeys everywhere else in the GDA.
- Providing infrastructure to reduce the heavy reliance on motor vehicles and recognising its use is dependent on people having a reliable predictable and efficient alternative transport modes they can combine using to their benefit.
- Evolutions in how vehicles moving people and goods operate are creating new options to adapt and evolve public transport provision and so expand the available capacity
- This includes tackling climate change where the early adoption by both private and public vehicles of emerging fuels and new technologies that are already developed to

reduce carbon emissions could very quickly transform transport into a climate change leader.

- Acknowledging the considerable transport policy challenge for the GDA and other City Regions of facilitating users wanting functional multi modal provision.
- Planning to substantially increase transport capacity in every mode starting in 2018 and not neglecting the vital transport arteries in the NPF for people and goods that is the core of an all island motorway network

Sacyr's experience around the work confirms the value adding contribution strategic motorway arteries make in supporting the results the NPF aims to achieve. And it also confirms that in Ireland a lot more thought is needed around facilitating the combined use by commuters of modern multi-modes of transport (e.g. private and public bus services, hire cars, private vehicles, trains and bikes).

Decisions

Transport in the GDA as well as within and between the other city regions on the island 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. The NPF effectively spreading the current economic and population growth to other City Regions will result in the same situation developing more rapidly elsewhere. To avoid this happening planning and transport investment needs to pay more attention to the key economic and social importance of vital strategic motorway arteries being in place to comprehensively connect the entire island with sufficient capacity for the projected population **as well as good future proofed functional connectivity with other forms of transport.**

Regrettably the most important evidence needed to guide and direct this planning and so build a resilient long-term transport strategy to underpin delivery of the NPF is compiling data to illuminate commuters' end to end journeys, purpose and destinations. Sacyr would recommend that the next phase of the NPF includes proposing that more in depth research is undertaken to compile and present data that illuminates what projects should be prioritised to be aligned with the NPFs proposals. This will greatly assist long term planning decisions made following the adoption of the NPF, provided it is inclusive of all forms of transport public and private, and is not confined to areas defined by administrative boundaries only. It is important to emphasise that this data could be collected over a relatively short period.

A practical case study of the impact of planning decisions to provide additional housing based on current transport policy has begun to unfold in Cherrywood in Dublin where up to 4,000 residential units are about to be built with full planning permission, along with significant commercial developments. However, there is no new public transport or access road planned to facilitate this significant increase in people in a small area. Nor has the impact on those living working and moving about in adjacent areas of south Dublin and the impact on the national infrastructure that is the M50 been considered in depth and operational detail.

Conclusion

There have been no major new transport projects initiated in Ireland recently that were not already in the pipeline before the Recession. However, being the fastest growing economy in the EU, and the only one with a growing population, is creating the need for this to substantially and urgently change.

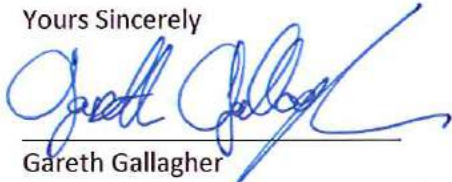
Therefore, Sacyr cordially submits that the answer to the question posed in the NPF as to *the nationally important infrastructure projects for Ireland that require delivery over the next twenty*

years should be to include planning starting in 2017 on a cross cutting basis between government departments, 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
- 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

Thank you for your attention and I would welcome the opportunity to discuss any of the above points in more detail in the coming months as the feedback to this important NPF consultation is being considered assimilated and brought forward.

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