

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

Dáta | Date
16 March 2017

Ár dTag | Our Ref.
TII17-96732

Bhur dTag | Your Ref.

RE: Ireland 2040 National Planning Framework – Issues and Choices

Dear Mr. Hogan

Transport Infrastructure Ireland (TII) welcomes the advancement of the National Planning Framework (NPF) and fully supports the concept of a statutory planning hierarchy which sets out the future development of Ireland at each spatial level from the national to the local. The provision of a spatial framework supported by a monitored implementation programme is essential for Ireland's future.

TII's mission is to deliver transport infrastructure and services, which contribute to the quality of life for the people of Ireland and support the country's economic growth. The transport asset managed by TII consists of 5,415kms of national roads and the entire light rail network. This infrastructure plays a critical role in providing for:

- Interurban travel for business and personal travellers;
- Essential travel infrastructure for the labour force in cities;
- Movement of freight nationally and internationally for exports; business and consumers;
- Links between communities and links between communities and urban centres;
- Implementation of policies to promote balanced regional development; and,
- Competitiveness of the Irish economy, including attractiveness to foreign direct investment.

In making this submission, TII acknowledges that the priorities and actions identified in the Department of Transport, Tourism and Sport's Strategic Investment Framework for Land Transport (SIFLT), will be incorporated into the new national planning framework. Having regard to the strategy set out in SIFLT and TII's statutory roles and functions, TII has identified four key themes to be considered in the NPF. These themes are:

1. TII as an enabler for the delivery and implementation of the National Planning Framework.
2. The importance of maintaining the "Steady State" condition of the existing TII assets and networks.
3. The identification of key TII projects contributing to the delivery of the National Planning Framework.
4. The implementation of the National Planning Framework.

These are elaborated in the following paragraphs:



1 TII AS AN ENABLER OF THE DELIVERY AND IMPLEMENTATION OF THE NATIONAL PLANNING FRAMEWORK.

TII acknowledges its relationship with the NPF team and is committed to continuing this support through the ongoing sharing of resources and the expertise developed over many years of successfully modernising, maintaining and operating critical transport infrastructure. Indeed, in conjunction with TII's designated roles and functions in the actions and priorities identified in SIFLT, it would be considered appropriate to ensure that this support continues. The document "Towards a National Planning Framework (December 2015)" outlines the composition of the Infrastructural Priorities Working Group. As of yet TII has not been invited to participate in this working group.

TII will make its resources available to support the preparation of Regional Social and Economic Strategies (RSES), whether as an active participant and/or consultee. TII will support the implementation and monitoring group for the adopted National Planning Framework.

In addition to our transport role and experience in the statutory planning process, TII has the capacity to provide very significant capabilities and resources in national transport planning. In this regard, TII has developed a multi-modal interurban model of the national transport network (National Transport Model-NTM) incorporating rail, bus and freight models in addition to the road network model. This NTM produces detailed, medium to long range projections of transport usage, covering all land based modes of travel. The NTM allows TII to understand the current and future hotspots across the national road network and the potential impact of any interventions in transport network or changes to demographics. This is a very powerful tool available for the preparation of regional and national plans.

Based on data from the NTM, the figures in the Appendix 1 attached show the current level of service of the national primary and secondary road network. They also show the projected level of service of the road network in 2030 taking account of the completion of the major roads projects contained in the current Capital Investment Plan. As indicated, significant sections of the National Primary and Secondary Road network are already operating over capacity.

RECOMMENDATIONS

TII is available to assist in the preparation and implementation of the NPF in particular by:

- 1.1 Provision of technical support for the preparation of the NPF.
- 1.2 Participation in the NPF's Infrastructural Working Group.
- 1.3 Participation in the preparation of the Regional Social and Economic Strategy (RSES).
- 1.4 Participation in the implementation and monitoring group for the NPF when adopted.

2 MAINTAIN THE "STEADY STATE" CONDITION OF INVESTMENT MADE IN TII ASSETS AND NETWORKS.

As indicated, TII operates a range of assets that make up the national road and light rail networks. One of TII's primary objectives is to ensure that the value and usefulness of this critical infrastructure are preserved in the most sustainable and cost effective way.

The rapid growth associated with the current economic recovery places increasing demands and challenges for both TII's networks. TII has tracked the associated growth in traffic volumes using its extensive network of traffic counters. This is presented in Appendix 1. This growth needs to be managed so the benefits of transport investment support appropriate plan led development patterns and economic objectives.

One of the priorities for land transport identified in SIFLT is the need to maintain and renew strategically important elements of the existing land transport system, so as to protect the benefits of earlier investment and maintain its essential function.

TII considers it essential that the NPF should recognise and include this priority, particularly in the context of the protection, maintenance and investment in the national road and light rail networks. This in turn should be embedded in the hierarchy of statutory landuse plans.

Priority 2 of SIFLT identifies the need to address congestion. Tackling congestion and delays on the national road network by removing bottlenecks is vital for economic growth. Traffic growth since 2011 has led to peak hour congestion on the network. This congestion creates significant negative economic and environmental impacts. It negatively impacts business and freight trips due to delays and unreliable journey times. This is particularly relevant on the strategic TEN-T network which includes the M50, N40 and other national routes already serving the Tier 1 Ports. The significance of this impediment to cater for growth may become even starker as the realities of Brexit emerge.

TII recognises that alleviating urban congestion will increasingly focus on encouraging a modal shift to public transport, walking and cycling for commuting and short distance trips. However, there remains a need to address sections of urban national roads where existing bottlenecks diminish the strategic function of the network as it serves and facilitates a growing economy

To the extent allowable, TII will address congestion by traffic management solutions and demand management measures to smooth and/or reduce peak demand. TII studies have identified a number of schemes where enhanced management of and improvements to the key urban national road links in Dublin, Galway and Cork will bring significant benefits. For example, TII's M50 Demand Management Study findings have been incorporated into the NTA Transport Strategy for Greater Dublin Area (2016-2035). This strategy promotes forms of demand management, area based travel plans and fiscal measures.

It is important that the NPF would align and recognise these principles, by ensuring that future investment and planning decisions maintain the value of investment made to date in the existing transport assets.

RECOMMENDATIONS

The NPF should recognise and make reference to the need to:

- 2.1 Protect and maintain the investment already made in the national road and light rail networks through appropriate planning practices and commitment to maintain the value and benefits of investments in these networks.
- 2.2 Recognise the need for transport demand management measures.

3 IDENTIFICATION OF KEY TII PROJECTS CONTRIBUTING TO THE DELIVERY OF THE NATIONAL PLANNING FRAMEWORK.

The national road network is the backbone of Ireland's land transport system. The network links cities, towns, ports, airports and other major trip origin and destination points. It is also critical for the safe and efficient movement of people and goods.

Over the last two decades, some 2,000km of the national road network has been upgraded. Eleven Billion euros was invested in the major inter urban motorway element of the network between 2000 and 2011. This much needed investment focussed on linking Dublin to the major urban centres on the island.

It is acknowledged that further national roads improvements are needed to provide connectivity between other urban centres and between rural areas served by those urban centres. From TII's perspective, the

current absence of a long term planning framework impacts the delivery of such national road schemes when they are needed.

TII welcomes that the NPF will establish a policy framework which would require that all future strategic infrastructure supports NPF objectives.

RECOMMENDATIONS

The NPF should seek to:

- 3.1** Identify major infrastructural investment required to support and facilitate national development, and
- 3.2** Develop a framework for infrastructural investment decision making.

4 ENSURE IMPLEMENTATION OF THE NATIONAL PLANNING FRAMEWORK.

TII will support the implementation of the National Development Plan. Effective implementation will require:-

a) Lead in Time for Project Planning

Typically, there is a five year timeframe associated with the development of any major transport project from initial feasibility through to planning approval. The NPF must recognise that major infrastructural programmes require long lead times.

b) Clear Direction For Statutory Land Use Plans

In order to ensure effective planning at regional level and to facilitate the preparation of each Regional Social and Economic Strategy (RSES) and associated transport strategy, TII is of the view that the National Planning Framework (NPF) should provide direction on each region's key spatial planning requirements.

From a transport viewpoint, a critical requirement of the NPF is to support the preparation and implementation of Regional Transport Strategies as identified in Strategic Investment Framework for Land Transport (SIFLT). TII can assist in the preparation of these strategies to ensure an efficient and sustainable build out for transport in the major population centres.

c) Investment

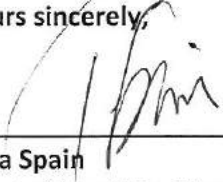
As already acknowledged in this correspondence, there are critical spatial and infrastructural priorities for the future which need to be incorporated in the NPF and associated expected implementation plan. From TII's experience lack of funding commitment could be the key barrier to delivery of the NPF.

CONCLUSION

A safe and efficient national road network and light rail service are crucial elements of Ireland's transport infrastructure and are vital for continued economic growth and sustainability. In TII's opinion, the current absence of a framework for long term planning has impacted on the delivery of major infrastructural schemes. In such circumstances, the significance of the proposed National Planning Framework (NPF) is recognised.

TII looks forward to a National Planning Framework which provides a coherent decision making structure around which infrastructural development can take place and ensures positive outcomes derived from national growth can be shared by people throughout Ireland.

Yours sincerely,

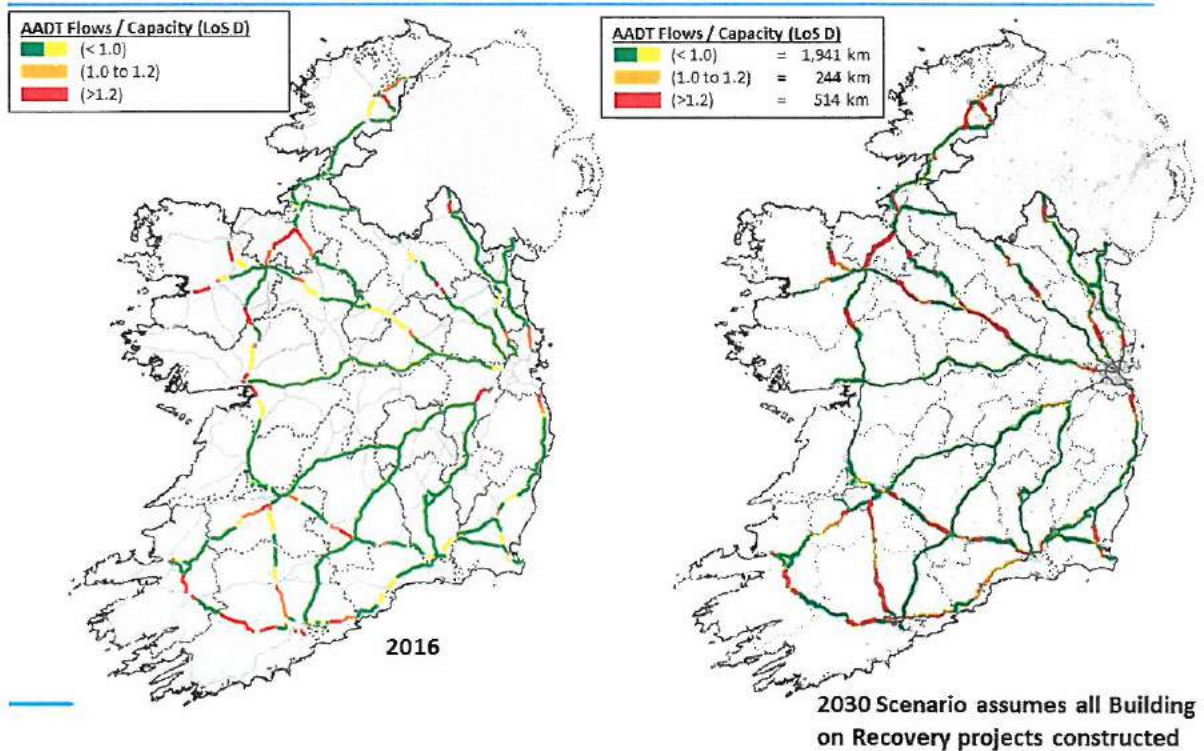
A handwritten signature in black ink, appearing to read 'Tara Spain', written over a horizontal line.

Tara Spain
Head of Land Use Planning

Appendix 1

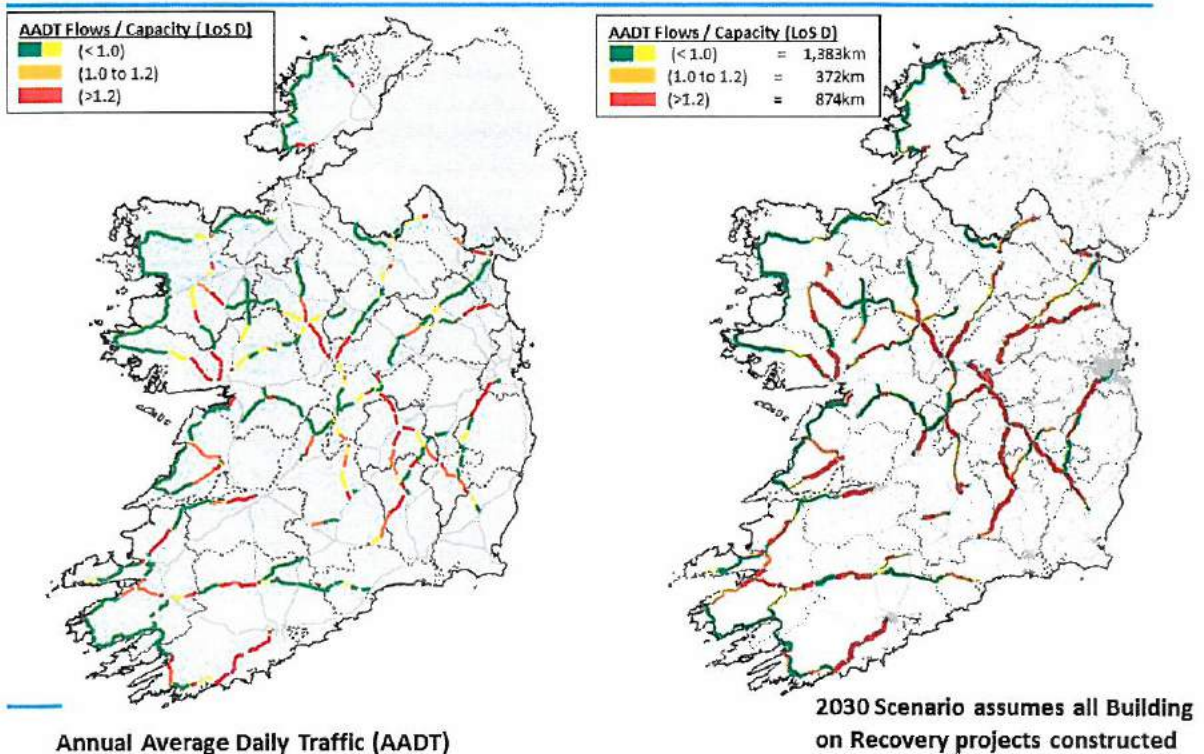
National Primary Road Network 2016 and 2030

Volume / Capacity ratio (Level of Service D)



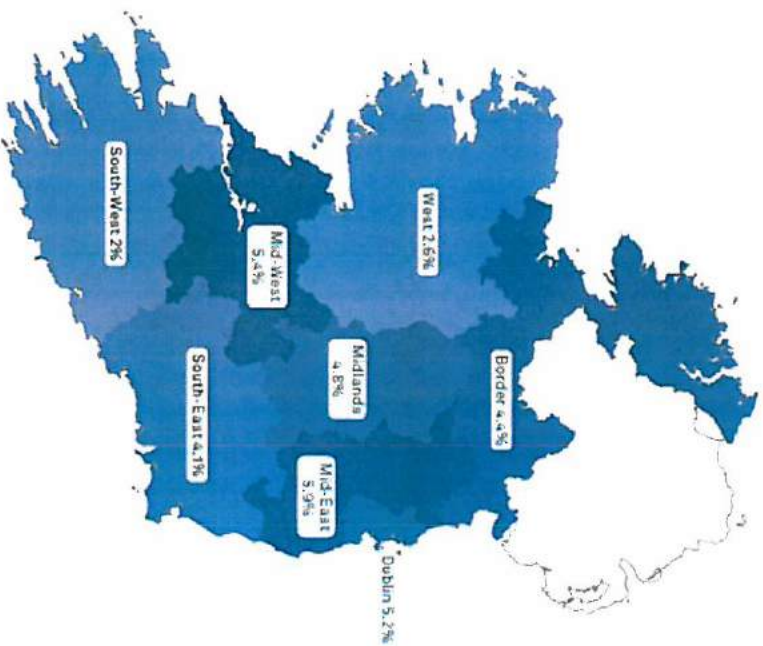
National Secondary Road Network 2016 and 2030

Volume / Capacity ratio (Level of Service D)



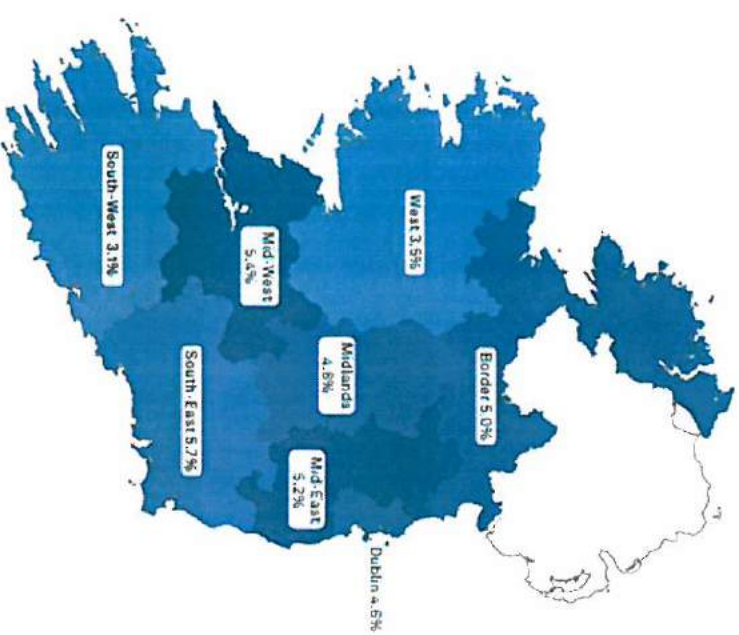
Appendix 2

Growth by Region (All Vehicles)



2014-2015

Growth by Region (All Vehicles)



2015-2016