

First Revision to the National Planning Framework Consultation,
Department of Housing,
Local Government and Heritage,
Custom House,
Dublin 1,
D01 W6X0.

12th September 2024

Dear Sir / Madam,

Re: Consultation on the First Revision to the National Planning Framework

Iarnród Éireann welcomes the opportunity to provide a submission to the consultation on the First Revision to the National Planning Framework. The National Planning Framework [hereafter the “NPF”] is of critical importance to the continued economic, environmental, and social development of the state. The Draft First Revision NPF, while clearly built on the positive fundamentals of the 2018 published NPF, could be stronger from the perspective of sustainable transport and the role of rail in particular to drive the achievement of a number of the National Strategic Outcomes identified. Given their interdependencies, strong synergies across areas of our national spatial planning including housing, transport, and infrastructure are vital to deliver the future vision for Ireland by 2040 and beyond. It is noted that this Draft First Revision of the NPF is aimed to take account of the changes that have occurred since it was published in 2018. One of the primary changes in this intervening period has been the Government level recognition of the role of rail to sustainably support our continued national economic growth and environmental goals through the publication of the All-Island Strategic Rail Review, in collaboration with the Northern Ireland Executive. Throughout this submission Iarnród Éireann will provide feedback on the areas of the Draft First Revision to the NPF which it feels could be enhanced to support the vision laid out for the state through the NSOs and for rail transport in Ireland through the All-Island Strategic Rail Review over the coming decades.

Summary of Key Submission Points

- Iarnród Éireann believe **rail plays a key role as the backbone of a sustainable transport system for Ireland**, with rail passenger journeys in 2024 forecast to exceed the pre-pandemic 2019 peak of 50 million journeys, highlighting rail and public transports resilience to change and continued importance in our national growth objectives.
- **Rail will play a central role in responding to the collective challenges we face as a nation**; providing for an increasing and aging population, a desire for better regional balance, an urgent requirement to respond to climate change, with the need to live and move about sustainably becoming more urgent with each passing day.
- **Rail is the focal point in sustainable spatial and land use planning**, with its high capacity and high punctuality capability supporting compact growth targets, with an integrated approach to transport and land use planning critical to the achievement of Irelands’ desired sustainability outcomes.

- **Rail contributes to each of the 10 National Strategic Outcomes (NSO)**, with rail a strong enabler to unlock NSOs 1, 2, 4, 5, 6 and 8. It consequently deserves appropriate mention in terms of messaging about the outcomes of the NSOs throughout the document.

Iarnród Éireann delivers on the objectives it has set – it has progressed priority projects from the 2018 NPF, notably the transformational DART+ Programme, with €1bn worth of DART+ West Railway Order infrastructure approved to progress to detailed design, Railway Orders lodged for DART+ South West and DART+ Coastal North, while also entering into the largest rail Fleet Framework Agreement in the history of the state with Alstom SA, placing two initial call-off fleet orders totalling a combined 185 for new electric and battery-electric multiple DART units, the latter of which will allow early decarbonisation and customer experience benefits in the Greater Dublin Area ahead of full electrification. Our ability to deliver will continue throughout the period to 2040, with other key projects in the Draft First Revision to the NPF such as **Cork Area Commuter Rail** and the **Enterprise Fleet Replacement Programme** also progressing well, harnessing EURRF and SEUPB funding respectively. Cork Area Commuter Rail currently has €350m worth of projects on site, under construction, highlighting Iarnród Éireann's ability to deliver transformational projects of scale.

Figure 1: DART+ Battery Electric Multiple Unit under construction in Katowice, Poland in 2024.



The **All-Island Strategic Rail Review (AISRR)** examined how the island's railways are currently used, what role rail (passenger and freight services) could play in future, and how the island's railway could better serve the people of both jurisdictions. across the island of Ireland over the coming decades – **it provides an opportunity for active incremental forward planning rather than reactive delivery, in line with the Investment and Prioritisation driver of the NPF review.** It includes 32 strategic recommendations to enhance the rail system in Ireland and Northern Ireland up to 2050, aligning with net carbon zero commitments in both jurisdictions. The ambition set in the AISRR (see *Figure 1*) needs to be better and fully reflected throughout the Draft First Revision of the NPF, notably its **transformative positive impact on spatial planning, economic development, and environmental targets over the period to 2040.** We suggest this is best done through a standalone Case Study (similar to page 112).

- **Key outcomes of the AISRR including separation of rail's fast and slow lines** along key corridors will be achieved with previous **capacity bottlenecks removed**, combined with **new trains and speed increases**, as well as facilitation of **significant frequency increases** across the island's rail network.

Figure 2: All-Island Strategic Rail Review: A future all-island railway 2050



- Rail travel accounts for only 1% of transport emissions while representing 8% and 17% of European passenger and freight movements respectively. In the face of the climate crisis, the global community has awoken to the benefits of rail and **the final version of the NPF needs to match that vision and fully support the implementation of the All Island Strategic Rail Review (AISRR).**
- **The Rail Investment Implementation Strategy** - The Department of Transport has engaged the European Investment Bank (EIB) in relation to an implementation strategy, to develop Rail Investment Implementation Plans for the infrastructure projects identified in the AISRR. The final NPF should acknowledge the importance of this workstream towards 2040 and the spatial planning through the supporting of the recommendations from the Rail Investment Implementation Plan 2025-2035 and the Long-Term Rail Investment Implementation Plan 2035-2050 once complete in summer 2025.
- **The role of rail freight to enable sustainable mobility of goods** in Ireland should be supported as a National Policy Objective in the final NPF. **Iarnród Éireann's Rail Freight 2040 is a transformative strategy** for rail freight with an ambitious vision to position rail strongly within Ireland's freight transport system in recognition of the carbon reduction benefits attainable, its' support of sustainable growth and the wider National Strategic Outcomes desired by Project Ireland 2040.
- **The Infrastructure Guidelines Approval Gate timelines and overall statutory planning process needs to accelerate turnaround times** if we are to meet the infrastructure targets set in the NPF. Like other sectors, delivery of transport projects has been impacted negatively by the current delivery processes to implement projects covered in the NPF and the supporting Tier 1-3 policies and strategies in the planning hierarchy. **A reduction in approval times for infrastructure projects is essential to enable the timely delivery of projects in the NPF and the National Development Plan (2021-2030).**

A commitment by Government to explore mechanisms to enable faster project delivery, particularly for committed projects under statutory documents such as the NPF, would be a useful addition to the final NPF. Concurrently, a mechanism to facilitate multi-annual funding for committed capital projects would greatly assist in gaining global construction sector and rolling stock manufacturer interest in rail capital projects as opposed to the annual budget approval for ongoing approved and strategically aligned projects.

Iarnród Éireann believe the delivery of the first Work Packages of the Cork Area Commuter Rail Programme funded under the European Union Recovery and Resilience Facility (EURRF) provides a good example of the benefits of accelerated delivery of project approvals, with construction contracts awarded for all three projects and all three to be delivered incrementally by 2026.

- **Financing for future infrastructure delivery** – while appreciating the high-level framework nature of the NPF, it would be useful to note the consideration in the NPF of potential funding strategies for rail infrastructure and fleet projects to sustainably deliver the vision of the AISRR incrementally to 2040 and beyond. This crosscuts with the earlier theme of active incremental forward planning rather than reactive delivery as the uncertainty of prevailing economic cycles on exchequer funds is somewhat dampened, allowing greater infrastructure project pipeline security and supporting our long-term national competitiveness.
- **Transport Orientated Development** – Iarnród Éireann welcomes the revised wording in Section 2.4 with regards to the role of Transport Orientated Development (TOD). The acknowledgement that a particular focus of this planning policy will be to concentrate “on TOD opportunities along high-capacity rail corridors” is greatly supported by Iarnród Éireann. The targeting of 40% of future housing development within the existing ‘footprint’ of built-up areas should be higher, especially in circumstances where high capacity public transport infrastructure, such as rail, is present or is planned as we move towards a more sustainable pattern of spatial and transport development, including TOD. If this remains at the levels planned, it is likely to inadvertently trigger greater sprawl as the majority of development is not driven to occur around the NSO of ‘Compact Growth’.

- **Rosslare Europort's continued expansion is critical to economic growth and environmental targets**
 - As outlined in Section 8.1 in the Draft First Revision of the NPF, Ireland's direct links with other EU Member States by sea is increasingly important. Rosslare Europort has seen a significant increase in trade activity, particularly after Brexit, underscoring **its strategic location in relation to enabling direct connections to other EU Member States**. Given developments following Brexit, Rosslare Europort has become a critical hub for exporters and importers throughout Ireland and the EU. Currently, it runs over 34 services to and from European destinations each week, marking a five-fold increase from 18 months prior, and 56 weekly services to the UK. As of 2022, 90% of merchandise imports to Ireland and 9% of passengers entering the country travelled through Irish sea ports.
 - **Section 8.1 should better reflect Rosslare Europort's strategic importance in the national context of ports policy**. We suggest this is best done through a standalone Case Study on the Port and Ireland's export supply chain's agility to adapt to macroeconomic and geopolitical changes (similar to page 112).
 - The **port recorded a +9% increase in RoRo traffic overall, making it the only port in the Republic of Ireland to achieve growth in this sector in 2023**. Rosslare achieved a +14% increase of RoRo traffic on the EU routes. While the Great Britain market continues to lag behind pre Brexit levels Rosslare was aligned with Dublin port with -2% drop of freight traffic between Republic of Ireland and Great Britain in 2023.
 - Rosslare Europort now holds a record 37% market share of all RoRo traffic between the Republic of Ireland and **delivers the highest number of weekly Ro-Ro sailings to and from Ireland to the EU**, more than any other port on the island of Ireland.
 - The development of **Rosslare Europort as an alternative to Dublin Port also has the potential to enhance the economy of the South East region in the short term, and contribute to the long-term growth of the national economy** through enhanced port services. Further development and expansion of services will assist in relieving traffic from the congested Dublin Port and create new trade activity, given its advantageous location. **IE, as the Port Authority, has prepared a Port Masterplan** to guide significant planned investment in port infrastructure. The Masterplan, together with initiatives under the strategic plan for the port, will guide potentially over €450M in investment by IE, TII, Wexford County Council and the Irish Government in Rosslare Europort over the next five years – highlighting the growing strategic importance of the Port.
 - Furthermore, **Rosslare Europort is uniquely placed to contribute to future Offshore Renewable Energy development at scale** and make a significant contribution to the implementation of the national Climate Action Plan objective to halve national emissions by 2030 and reach net zero emissions no later than 2050. The Irish and Celtic Seas, off the east and south coasts, will likely accommodate the majority of the 5 GW of offshore wind planned by 2030.
 - Given Rosslare's strategic location on the rail network, **it possesses significant potential to serve as an effective rail freight link to the entire Island of Ireland**, in line with the outcomes of the AISRR, while also aiding in the decongestion of Dublin Port in a sustainable manner while further enhancing the economy of the South East.

More Detailed Feedback on the Submission

Page 5 - National Strategic Outcomes

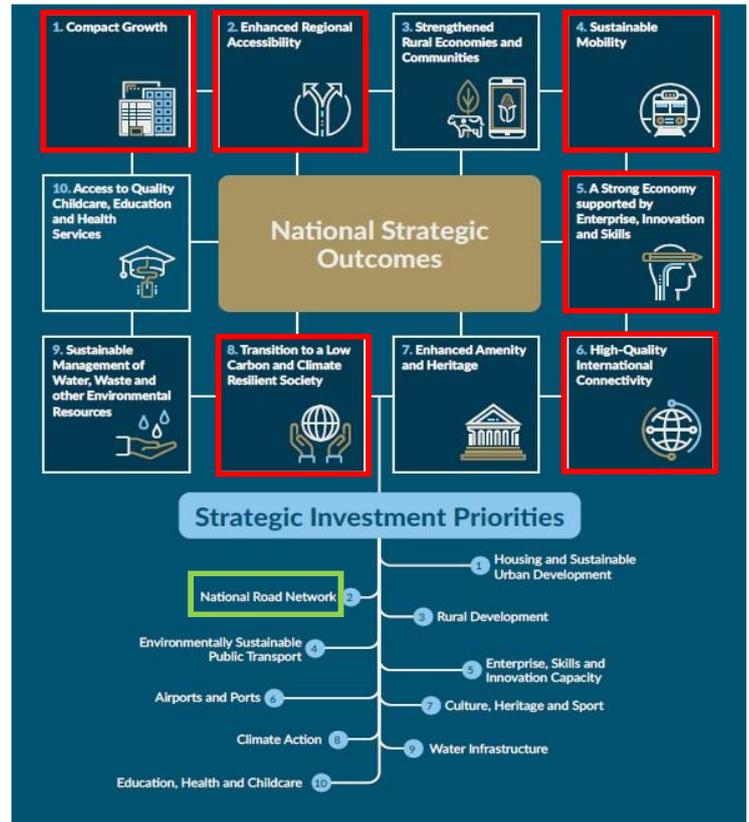
Rail contributes to each of the 10 listed outcomes, significantly to most of them (in red), and consequently deserves appropriate mention when messaging about the outcomes through the document. Given the level of contribution that rail makes, currently and into the future, it deserves specific mention in the Strategic Investment Priorities on the graphic to the bottom of the page.

This could be as simple as adding to the second priority (in green) to become ‘National **Rail and** Road Networks’ as the Strategic Investment Priority 4 does not fully capture the rail network benefit for both passenger and freight. The strategic value of rail and intention to prioritise investment in it has been signalled by the publication of the All-Island Strategic Rail Review in July 2024.

Page 6 - Shared Goals – Sustainable Mobility

Iarnród Éireann would suggest the inclusion of specific messaging on rail and the AISRR within NSO 4, Sustainable Mobility, with suggested lines along the following to be added:

Figure 3: National Planning Framework and its National Strategic Outcomes and Priorities of the National Development Plan showing rails strong contribution areas (red) and proposed text for updating (green)



‘Rail in particular can play a significant role as the backbone of a sustainable transport system for Ireland, contributing to each of the other National Strategic Outcomes, with this recognised by the recommendations of the AISRR jointly published by the Department of Transport and Department for Infrastructure [Northern Ireland] in July 2024’

This is critical to also capture the benefits of rail freight, which are supported in the AISRR, but not currently explicitly acknowledged in any NSO.

Page 9 - Likely Future Development Scenarios

This page presents a ‘likely future development scenario to 2040’ in graphic form and based on ESRI trends. This is a useful presentation format that communicates the intended messages. As a suggestion that would be additionally useful, towards winning the ‘hearts and minds’ of readers, to include a similar styled presentation of ‘desired’ revised final 2024 NPF outcomes. This would clearly show the contrast between the ‘likely future’ and the vision of what is ‘desired’ as promoted by the NPF.

Page 16 - Overview of the NPF Strategy / Compact Growth

This section could benefit from a reference to the role of Transit Oriented Development (TOD) under the title of Compact Growth, to further reinforce the need for more concentrated development in proximity to high-capacity transport corridors. This could take the form of adding to the first bullet point to read ‘...of built-up areas and along high-capacity public transport corridors’.

The targeting of 40% of future housing development within the existing 'footprint' of built-up areas should be higher, especially in circumstances where high capacity public transport infrastructure, such as rail, is present or is planned as we move towards a more sustainable pattern of spatial and transport development, including TOD. If this remains at the levels planned, it is likely to inadvertently trigger greater sprawl as the majority of development is not driven to occur around the NSO of 'Compact Growth'.

Communities, well connected by good quality and high capacity public transport systems, provide attractive places to live. Strong demand for homes along high frequency rail corridors, in Ireland and overseas, reflect people's desire to live close to transport links. By 2040, Ireland's population living within 5km of existing rail stations will have increased by at least 25%, to over 3 million people. This means rail has the potential to serve more than 1 in every 2 people across the country. An additional 400,000 jobs are expected to be created close to rail stations, bringing the total to over 1.4 million. These figures will increase further still as more services, new rail corridors, and new and upgraded stations improve accessibility for communities across the network.

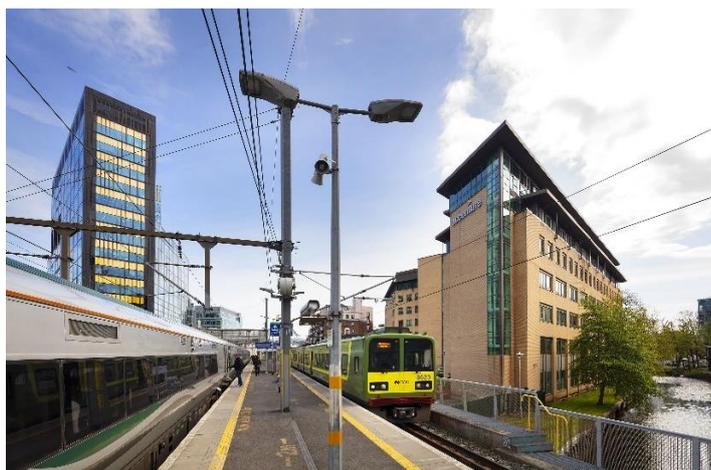
The reality we face is that without delivering mass transit, rail in particular, to serve higher concentrations of homes and jobs in our cities and towns, in the form of Transit Oriented Development, we will fail to meet Ireland's national policy objectives for sustainable living. Providing better rail services will encourage people living along corridors to choose rail. At the same time, it will concentrate new homes and businesses seeking to avail of these improved services. This approach is also true for freight where concentrated logistics, distribution and industrial development around modern rail freight terminals will be more efficient and sustainable for Ireland over the longer term.

Many major Transit Oriented Developments are currently being progressed across Ireland, including at city railway stations in Cork, Galway and Waterford as well as in Dublin, with further potential to apply such an approach along rail corridors as capacity enhancements are implemented.

Micro Case Study – Grand Canal Dock

The mixed-use high-density model at Grand Canal Dock is now a well-established example of Transit Oriented Development being applied. Opening in 2001 on the south side of the city, and served by DART and commuter rail, the station has grown quickly to **become the 5th busiest on the rail network with almost 10,000 users each day.**

Today the station catchment area is home to thousands of residents and jobs including new employment, leisure and entertainment land-uses and is expanding rapidly with three 55 metre office towers recently constructed close to the station at Bolands Mills for use by Google.



Grand Canal Dock Station

The station is a key driver of 'Silicon Docks' with Google, Facebook, Twitter, LinkedIn, Airbnb, Accenture and others choosing to locate close by to benefit from excellent transport connectivity.

Page 33 Key future growth enablers for Dublin

Suggested edit to the third last bullet on Dublin Airport connectivity to remove both 'in the longer term, consideration' and 'in the context of potential electrification' and replace with:

‘...and rail connectivity to facilitate direct services from the national rail network in line with EU Trans-European Transport Network [TEN-T] regulations and AISRR recommendations’

Page 40+ - Key future growth enablers for each of the cities

While the enablers set out are will enhance the development of each of the cities, broadly, these sections could do with a general point around enhanced connectivity, to include rail aligned with the AISRR recommendations, with the other cities and regions – a primary focus of the AISRR. Such a point could read as

‘enhanced rail connectivity with Dublin and the other regional cities, through improved service frequency and reduced journey times, in line with the recommendations of the AISRR’.

Iarnród Éireann would strongly recommend adding something similar to this in relation to Galway [Page 40], Limerick [Page 46] and Waterford [Page 47], with appropriate editing of the third last bullet point on the Cork section [Page 45].

Page 46 - Key future growth enablers for Limerick

The third and fourth last bullets can be enhanced with inclusion of ‘rail’ references. Again, connectivity with Dublin is assumed to be okay and hence not mentioned. Recognising that rail connection with Foynes Port is being re-instated, a suggested edit to the fourth last bullet point to read:

‘enhanced rail and road connectivity to Shannon – Foynes Port, including local by-passes’

Edit the third last bullet point to read:

‘enhanced regional connectivity through improved average journey times **by rail** and road to Cork, Waterford and Galway, in line with AISRR recommendations’

Page 47 - Key future growth enablers for Waterford

Edit the third last bullet point to read:

‘enhanced regional connectivity through improved average journey times **by rail** and road to Cork, Limerick and ports within the region, in line with AISRR recommendations’

Page 91 Location of Homes

Enhancing the key message of the intrinsic link between achieving sustainable compact development and the provision of supporting high-capacity public transport corridors could be further reinforced in the section with the similar edits to the following; Add to the wording of the text on National Policy Objective 44 to read:

‘Prioritise the provision of new homes at locations that can support sustainable development, **particularly along high-capacity public transport corridors**, and at an appropriate scale of provision relative to location’

Edit the first bullet to read:

'be located in places that support sustainable development – *principally along high-capacity public transport corridors*, places that support growth...'

Page 112 Enterprise Case Study

Sharper messaging about line speed improvements and electrification would be useful, along with referencing the AISRR recommendations. This could be achieved with the addition of the following sentence at the end of the third paragraph.

'Parallel infrastructure works will be progressed along the line to significantly reduce journey times and provide for electrification, in line with AISRR recommendations'.

Note the typo 'Department **for** Infrastructure (Northern Ireland)' in the second last paragraph – currently 'Department of Infrastructure (Northern Ireland)'

Page 153 Prioritising Development Lands

The All-Island Strategic Rail Review states that "it will also be important for authorities in both jurisdictions to implement planning policies that safeguard land for future railways and stations". Within this Tier 1 statutory planning framework, it would greatly assist the successful planning and implementation of the AISRR over the course of the NPF if wording to require authorities at a Regional and Local level ***'to implement planning policies that safeguard land for future railways and stations'*** was included. This could be an additional element of National Policy Objective 101, or a new National Policy Objective in its own right.

Page 154 National Strategic Outcome 2 Enhancing Regional Accessibility

There should be a section here on 'Inter-Urban Rail' speaking to the AISRR recommendations, for passenger and freight, providing an element of balance with the sub-section on Inter-Urban Roads.

Page 156 NSO5 Sustainable Mobility

Similar to the proposed changes to Page 6 - Shared Goals – 'Sustainable Mobility' earlier in this submission,

The publication of the All-Island Strategic Rail Review enhances the already strong momentum behind the development of our rail network, as we move towards cementing rail as the spine of our sustainable transport network going forward, and this revision of the National Planning Framework is fundamental to support the sustaining of that momentum.

The National Planning Framework should continue to support the delivery of our existing services and portfolio of capital projects, including DART+, CACR and the many projects Iarnród Éireann are currently progressing.

Iarróid Éireann looks forward to working collaboratively with you and all stakeholders to achieve the positive outcomes the final revised NPF will bring for Ireland.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Jim Meade". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jim Meade

Chief Executive