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Message Body:
Submission attached

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Jim Conway
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16 January 2019

TII18-102716

Re: Draft Regional Spatial and Economic Strategy for the Eastern and Midland Region

Dear Mr Conway,

TII wishes to acknowledge the significant effort undertaken by the Regional Assembly during the preparation of this valuable document. The Draft Regional Spatial and Economic Strategy for the Eastern and Midland Region is a much welcomed document and to facilitate a realistic development framework for the Region for the implementation of the Government's Project 2040.

TII observes 16 Regional Strategic Objectives (RSO's) in the Draft Regional Spatial and Economic Strategy (RSES). TII considers that its functions provide direct support for the implementation of RSO's: 6. Integrated Transport and Land Use, 14. Global City Region and 15. Enhanced Regional Connectivity. However it should be highlighted that ensuring that the future growth is sustainably managed within the capacity of existing national assets and resources, including the national roads and light rail network, is critical for the implementation of the remaining other 13 RSO's.

TII has identified two themes based on TII functions which require further consideration for the finalised Regional Spatial and Economic Strategy to ensure the operational capacity, maintenance and safety of TII assets in the Region and implementation of the RSES and Project 2040. They are as follows:

- a) Recognising wider regional accessibility and global connectivity, and
- b) Clarification of engagement and collaboration in future plans within the region

The following elaborates on the above for consideration of the Regional Assembly:

1. REGIONAL ACCESSIBILITY AND GLOBAL CONNECTIVITY

While light rail facilities sustainable growth within the Metropolitan region, the national roads network is a critical enabler in facilitating an island wide sustainable national transport system. These high value assets and amenities need to be protected and their use enhanced for the Region and also the country as a whole. This is to support economic and community interaction across a range of sectors in the region and beyond including providing regional connectivity, addressing peripheral issues, empowering rural communities and facilitating access to critical services such as education, healthcare, employment and enterprise. TII considers that improving and maintaining the assets of all national roads are critical. It is acknowledged that Chapter 8 indicates the importance of the national roads assets, however apart from references related to the Dublin Belfast Corridor the remaining chapters are silent on safeguarding the assets.

TII would highlight that the Eastern and Midland Region not only hosts the gateway infrastructure of Dublin Port and Dublin Airport but also facilitates the conduits of access i.e. road and rail to these key global assets

for the whole nation. This principle as applies to the other unique national assets located within the Region including national universities, national hospitals etc.

Therefore there is a need ensure the requirement to achieve and maintain steady state investment in existing transport networks and systems to enable performance to a standard capable of efficiently and safely facilitating transport is embedded in the Strategy. This is of particular importance in addressing the demand arising from National Planning Frameworks population, economy and regional growth objective.

TII would recommend the following:

a) Safeguarding and Enhancing National Assets

TII would highlight that the Growth enablers for the Hinterland area (page 29) includes the statement *"High value assets and amenities to be protected and their use enhanced for all the Region"*.

In the opinion of TII, this statement should apply to all similar assets within the EMRA such as Dublin Airport, Dublin Port, Dublin Belfast Corridor and the national roads network, etc.

In this regard, the following text changes are recommended to reflect the regions unique national function, existing text in Chapter 8 Connectivity and also to protect TII assets within the region.

Recommendation 3.2 Growth Enablers for the Region

Page 28 Growth enablers for the Dublin metropolitan area include;

- Protect and improve access to the global gateways of Dublin Airport and Dublin Port for the Region and to serve the nation.

Page 29 The Dublin Belfast Corridor

The Dublin to Belfast Corridor is the largest economic agglomeration on the island of Ireland, with the cities and towns along the corridor home to a population of around 2 million people. The Eastern Seaboard has seen the highest growth and highest internal migration of our population. The corridor links the two largest cities and the large towns of Drogheda, Dundalk and Newry on the island by high-capacity national roads and national rail links and plays a critical role in supporting economic growth and competitiveness.

Growth enablers for the Dublin Belfast Corridor include;

- Safeguard and improve accessibility and service by rail, road and communication between Dublin and Belfast

b) Dublin MASP

TII supports the guiding principles included for the sustainable development of the Dublin Metropolitan Area to achieve the Vision the MASP. TII would emphasise the importance of the need to not only improve but maintain the capacity and operation of the national roads network as included in RPO 8.2 RPO 8.13: and RPO 8.14 in Chapter 8 Connectivity.

RPO 8.2 states *"The capacity and safety of the Region's strategic land transport networks will be managed and enhanced, including through the management of travel demand in order to ensure their optimal use."*

TII would highlight that principles under Section 5.3 associated with "Dublin as a global gateway", "Integrated transport and land use" and "Enabling infrastructure" should be amended to reflect the need to protect and enhance existing transport assets to reflect RPO 8.2 and text inclusions in Section 5.6. It is also noted with concern that transport infrastructure is not associated as an enabling infrastructure despite the transportation requirements highlighted in table 5.1 Strategic Development Corridors, Capacity Infrastructure and Phasing. The following text changes are recommended to reflect the existing text in Chapter 8 Connectivity and also to protect TII assets within the region.

Recommendation: Text Change Section 5.3

Dublin as a global gateway – Improve and maintain access to Dublin Airport by public transport and road and facilitate the continued growth of Dublin Port by protecting existing access and also providing for improved access to/from the southern port area.

Integrated transport and land use – Target growth along high quality public transport corridors and nodes linked to the delivery of key public transport projects including BusConnects, DART expansion and Luas extension programmes and the Metro Link, along with better integration between networks while maintaining the capacity and safety of the Region's strategic land transport networks.

Enabling infrastructure - Identify infrastructure capacity issues and ensure transport, water / waste water needs are met by national projects and improve sustainability in terms of energy, waste management and resource efficiency and water, to include for district heating and water conservation.

2. CLARIFICATION OF ENGAGEMENT AND COLLABORATION IN FUTURE PLANS

a) Urban Area Plan (UAP) in Regional Growth Centres

TII notes the inclusion of requirements to prepare Urban Area Plans (UAP) within Regional Growth Centres. With regard to the preparation of these plans, the Draft RSES is unclear with regard to the status of these plans, in particular to the statutory basis, and stakeholder engagement.

Given the importance, complexity and requirements for the Regional Growth Centres, it would be expected that these plans would form part of a statutory plan to inform the relevant development, local area plans, retail strategies etc. required for these critical centres. TII would also highlight that in relation to national roads that engagement with the Authority to facilitate appropriate transport assessment and inform planning objectives would be critical to the Urban Area Plans concerned.

TII therefore request written clarification in the finalised RSES with regard to the preparation and subsequent status of these plans and proposals to ensure the integration of land use and transport planning in their preparation. The following provides TII's suggestions.

Recommendation: Urban Area Plan (UAP) in Regional Growth Centres.

- Requirement to define Urban Area Plan (UAP) to indicate statutory status, stakeholder/statutory consultee engagement, public consultation and inputs into future plans.

Suggested Text Changes as follows:

- **Athlone Regional Growth Centre**

RPO 4.4: A statutory cross-boundary Joint Urban Area Plan (UAP) shall be prepared by Westmeath County Council and Roscommon County Council in consultation with relevant stakeholders to provide a coordinated planning framework to identify and deliver strategic sites and regeneration areas for the future physical, economic and social development of Athlone and the Monksland/ Bealnamulla area. The Joint UAP shall ensure that Athlone achieves targeted compact brownfield / infill growth of a minimum of 30%. The Joint UAP shall identify a boundary for the plan area and strategic housing and employment development areas and infrastructure investment requirements to promote greater co-ordination and sequential delivery of serviced lands for development.

- **Drogheda Regional Growth Centre**

RPO 4.8: A statutory cross-boundary Joint Urban Area Plan (UAP) shall be prepared by Louth County Council and Meath County Council in consultation with relevant stakeholders to provide a coordinated planning framework to identify and deliver strategic sites and regeneration areas for the future physical, economic and social development of Drogheda to ensure it achieves targeted compact brownfield / infill growth of a minimum of 30% and ensure a co-ordinated approach is taken to the future growth and development of the town to ensure that it has the capacity to grow sustainably and secure investment as a Regional Growth Centre on the Dublin – Belfast Corridor.....

- **Dundalk Regional Growth Centre**

RPO 4.15: A statutory Urban Area Plan (UAP) shall be prepared by Louth County Council for Dundalk in consultation with relevant stakeholders to provide a coordinated planning framework to identify and deliver strategic sites and regeneration areas for the future physical, economic and social development of the town to ensure targeted compact growth of a minimum of 30% is achieved.....

b) Local Transport Plans (LTP)

TII are concerned with regard to the description, procedures and statutory status indicated for Local Transport Plans (LTP) on page 146. It is unclear in the text which body/agencies will be responsible for the preparation, adoption and implementation of these plans which are to be prepared for Athlone, Dundalk, Drogheda, Portlaoise, Mullingar, Tullamore, Longford, Balbriggan, Navan, Naas, Newbridge, Wicklow-Rathnew, Ashbourne, Arklow, and certain large settlements or development areas within the Dublin Metropolitan Area.

It is noted with concern that TII has not been included in the preparation of these transport plans despite TII's role as a statutory consultee/ prescribed body under the planning regulations. In addition the interaction of the Local Transport Plan with the proposed Urban Area Plan (UAP) in Regional Growth Centres is not indicated.

TII would highlight that Local Transport Plan need to be complementary and inherent to the preparation of statutory plans. This promotes the integration of land use and transport planning.

National transport and land use policy has consistently had a stated aim of promoting modal shift away from the car, with the objectives of limiting urban congestion, reducing the environmental impact of transport, and avoiding the high cost of providing additional road capacity. The achievement of accessibility for all is of critical importance, through the most effective and inclusive mix of mobility opportunities, and by association, the most appropriate provision for walking, cycling, public transport, commercial traffic and the private car. The effective integration of land use and transport planning through the planning process can play a central role in providing for more sustainable and equitable forms of development.

The challenge is to ensure that sustainable transport is considered and planned for at the earliest stage, at every level in the hierarchy of plans and investment programmes and ultimately in the assessment of the developments' transport requirements and impacts at the local level.

Therefore Local Transport Plans, which are prepared using Area Based Transport Assessment (ABTA), should not be carried out in isolation from the respective land use plan. An iterative approach is recommended, with early discussions between the relevant agencies and the planning authority taking place at an early stage. This is required in order to determine the scale, density, mix of uses and phasing of development, and to assess the transport impacts / identify the associated transport requirements.

Guidance has been prepared by TII and the NTA with regard to undertaking Area Based Transport Assessment (ABTA) which is available at <http://www.tiipublications.ie/library/PE-PDV-02046-01.pdf>

These issues need to be clarified in the Chapter 8 Connectivity text of the final RSES. Suggested changes are included below:

Local Transport Plans

Local Transport Plans (LTP) to be prepared by local authorities in conjunction with the NTA and TII will represent the lowest tier of the NPF's framework for the integration of land use and transport planning and the achievement of the NPF's objective of 'compact smart growth'. They will be subject to further transportation and environmental assessment at local level as appropriate based on guidance available.

LTPs will be based on a clear set of objectives and the most recent demographic and travel information taking into account the policies and objectives of the Local Authorities, insofar as they align with those of National and Regional Policy.

LTPs will include the transport priorities for each settlement in terms of public transport infrastructure and services; cycle investment; improvements to the pedestrian environment; and road enhancements. Local Link Offices (Transport Coordination Units) will be consulted in the development of LTPs.

The policies, objectives and measures which emerge from the LTPs shall be incorporated into the relevant statutory land use plans pertaining to each settlement including Regional Growth Centre Urban Area Plans. The settlements for which Local Transport Plans will be made will include, but will not be limited to, Athlone, Dundalk, Drogheda, Portlaoise, Mullingar, Tullamore, Longford, Balbriggan, Navan, Naas, Newbridge, Wicklow-Rathnew, Ashbourne and Arklow, and certain large settlements or development areas within the Dublin Metropolitan Area.

Local Transport Plans RPO 8.5:

In order to give local expression to the regional level Transport Strategy within the Region, Local Transport Plans (LTP) will be prepared by local authorities in conjunction with the NTA and TII, for selected settlements in the Region to inform the Urban Area Plans, development and local area plans.

CONCLUSION

It is requested that the foregoing comments and observations are taken into consideration. In addition, TII have identified a number of typographical errors which can be made available to assist the Regional Assembly team.

TII as always remains available to discuss the issues outlined and also to assist the EMRA in terms of technical expertise and experience in further developing the RSES and its implementation, where relevant, and in relation to the identified subordinate plans and strategies in developing a sustainable land use and transport based planning framework for these matters.

Yours sincerely



Tara Spain
Head of Land Use Planning

