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Please find attached comments from the Department of Transport, Tourism and Sport on the draft RSES which was published for public consultation.

Regards

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Draft Regional Spatial and Economic Strategy for the Eastern and Midland Region: Public Consultation Document Department of Transport, Tourism and Sport Comments

1. General Comments

The Department of Transport, Tourism and Sport welcomes the comprehensive draft Regional Spatial and Economic Strategy for the Eastern and Midland Region and the close engagement between the Department and its agencies (National Transport Authority, Transport Infrastructure Ireland) with the Regional Assembly on the development of the draft RSES. We understand that both the NTA and TII will be making individual submissions with comments on the draft RSES.

The Department recognises that many of our comments on previous drafts of the RSES have been taken on board in the published draft document. The Department has some further comments across our sectors which are set out below. We are available to meet bilaterally to discuss these comments in advance of finalisation of the RSES.

The draft RSES is closely aligned with Project Ireland 2040 (National Planning Framework and National Development Plan) and sits well with this Department's forthcoming plan – Planning Land Use and Transport Outlook (PLUTO) 2040. PLUTO 2040 will take the objectives of Project Ireland 2040 (as set out in the NPF and NDP) and the priorities set out in this Department's 2015 Strategic Investment Framework for Land Transport, and develop high-level objectives for investment in Ireland's roads and public transport infrastructure on the basis of them. One of the key challenges PLUTO 2040 will set out to address is the fact Ireland's transport system faces a number of competing, and in some cases, opposing objectives (such as expanding our transport infrastructure while ensuring Ireland achieves compact growth). The purpose of PLUTO 2040 is to develop a framework for Ireland's land transport policy and investment which provides an appropriate balance between its objectives.

The appropriate phasing of development is mentioned in relation to the Dublin MASP in chapter 5. Phasing is also an important consideration for PLUTO, with the pursuit of one transport objective having the potential to undermine another if not sequenced correctly. This issue could be more prominent within the draft RSES as a whole rather than mentioned only in relation to the Dublin area.

It is important to note that all new transport projects must be appraised in accordance with the Public Spending Code and the Common Appraisal Framework for Transport Projects and Programmes before they can be approved, whether or not they are included in the National Development Plan. Where the RSES lists aspirations beyond the NDP, it should be noted that the scope for such developments between now and 2027 will be constrained.

2. Public and Sustainable Transport

The draft RSES is aligned with both the NTA's Transport Strategy for the Greater Dublin Area and the public transport priorities of Project Ireland 2040. The Department welcomes the public and sustainable transport elements of the draft RSES and the principles of promoting the best use of

existing and planned transport infrastructure and sustainable and active modes of travel. We also welcome the focus on walking and cycling as a facilitator of compact growth at every level, from the cities and regional centres to smaller settlements through the Local Transport Plans.

A number of specific comments in relation to the public transport elements are included below.

Page 48: The DART Expansion Programme is referenced as important to Drogheda and in the NPF. The RSES should reflect that the programme is also included in the National Development Plan.

In relation to the section on Rural Transport on page 152, the following additional text is suggested to reflect the role of the NTA in the provision of public transport services in rural areas and that the Local Link programme is one type of a range of public transport services in rural areas.

Page 152: Rural Transport – suggested additional text

In addition to public transport services in rural areas provided by State and commercial transport operators, the NTA provides rural public transport services through the Local Link Rural Transport Programme Strategic Plan 2018-2022. The key priorities of this programme continue to be directed at addressing rural social exclusion and the integration of rural transport services with other public transport services. The programme mission statement is 'to provide a quality nationwide community based public transport system in rural Ireland which responds to local needs'. The services provided under the programme are therefore intended to fulfil a primarily social function, in meeting the needs of communities in towns, villages and rural areas.

Regional Policy Objective

Local Link Rural Transport Programme

RPO 8.11: Support the Local Link Rural Transport Programme throughout rural areas of the Region.

It is suggested that Table 8.1 on page 143 refers to the *Local Link Rural Transport Programme Strategic Plan 2018-2022* as this is the relevant strategic plan for the programme. Table 8.1 should also include PLUTO in the hierarchy of policies and plans at national level.

3. Sustainability and Climate Action

The Department welcomes the prominent role given to sustainability and climate action throughout the draft RSES. The proposed combination of support for National Climate Adaptation and Mitigation Policies with further region-specific and site-based measures should ensure consideration of climate and environment at every level. There are a number of high-level measures that we would request be taken into consideration during the finalisation of the RSES.

Modal Shift

The importance of establishing and maintaining a fit-for-purpose public transport service throughout the Eastern and Midlands Region is well communicated throughout the draft RSES. The Department is supportive of measures to improve the public transport service as it will encourage modal shift away from private car use. As such, perhaps a little more focus could be placed on the importance of public transport as an environmentally-friendly travel option throughout the document. Due to the planned DART Expansion Programme and the commitment in the National Development Plan to stop

purchasing diesel-only buses for urban bus fleets from July 2019, modal shift to public transport is likely to help improve air quality in cities and major towns.

Alternative Fuels

It is important, however, to recognise that public transport is not available throughout the entire region and in more rural areas there is a high dependence on the private car. This is recognised in the draft RSES, but apart from modal shift there is little attention given to how this can be combatted. Due to this dependence, it is considered that the main way to combat transport emissions from rural areas such as the Midland Region is to encourage a move away from petrol/diesel fuelled vehicles. RPO 7.41 on page 138 deals with decarbonising transport through alternative fuels, however given its importance and the potential impact on planning, parking and other areas of the RSES, we would like to see the accommodation of charging infrastructure to have a stronger prominence in the relevant areas of the draft RSES e.g. Section 10 – Infrastructure.

While alternative fuels such as biofuels are mentioned in the draft RSES, the focus of transport decarbonisation seems to be on a shift to electric vehicles. This is welcomed as Ireland's EV fleet continues to grow and the demand for charging infrastructure increases alongside it; however it is important to give adequate consideration to other types of alternative fuels as they will become increasingly important, particularly in the heavy duty vehicle sector, as the move away from traditional fossil fuels continues. The National Policy Framework for Alternative Fuels Infrastructure in Ireland is a useful resource which can be referenced in the RSES, if required.

Adaptation

The recognition of the need for resilient critical infrastructure is in line with the recommendations of the National Adaptation Framework and the statutory adaptation plan for transport, which is due to be published by September 2019. The role of local government organisations and structures in this regard should be highlighted further, such as the need to consider climate adaptation in long-term resource allocation and investment for local authorities.

4. Airports

The importance of the Dublin Belfast Corridor, which includes the airports of Belfast International and Belfast City, is highlighted in the draft RSES as the national entry point to the island through its airports and ports. The Department supports the guiding principle in the draft RSES to improve access to Dublin Airport by public transport and road, particularly the planned Metrolink.

The draft RSES does not refer to Shannon Airport and its importance to key urban centres in the Midlands. With the improved motorways, towns such as Athlone are easily accessible to Shannon Airport and thus are a key asset in Athlone's attractiveness to FDI and tourism. A similar argument can be made in relation to Ireland West Airport Knock (IWAK), which is between 1hr and 1hr 40 minutes from the urban centres of Longford, Athlone and Mullingar.

5. Roads

The Department recognises that the draft RSES takes on board our earlier comments on previous draft documents in relation to roads projects. As with the public transport elements, it is important that the draft RSES is recognising the NTA's Transport Strategy for the GDA as providing the

framework for the planning and delivery of transport infrastructure in the GDA. The alignment of the MASP and the GDA Transport Strategy is also vital in terms of coordination of policy making and investment.

6. Maritime

As an island nation, ports play a crucial role in facilitating Irish economic growth and prosperity and it is estimated that the ports handle 84% of Ireland's merchandise trade in volume and 62% in value terms.

National Ports Policy 2013 categorises Dublin Port Company (DPC), Ireland's Largest Port, as a Port of National Significance (Tier 1) and the continued commercial development of the company is a key strategic objective of Government and is necessary to cater for future national trade capacity requirements. The Company is also recognised as a 'core' port within the new TEN-T (*TransEuropeanNetwork-Transport*) Regulation at a European Union level and has commenced extensive redevelopment of port facilities.

The Department welcomes the recognition of Dublin Port in the draft RSES as a critical national facility, a key economic driver for the region and the nation and an integral part of Dublin City. This is further reflected in the commitment under Regional Policy Objective 8.19.

7. Tourism

The following minor additional text is suggested in relation to the section on Tourism:

Page 99: Tourism

A safe, clean environment, scenic landscapes and rich heritage contribute greatly to our cultural identity and quality of life, and are key attractions for overseas visitors to the island of Ireland. The Government's Tourism Policy Statement People, Place and Policy Growing Tourism to 2025 sets the Government's primary objectives for tourism i.e. to increase overseas visitors and revenue and the associated employment whilst protecting our natural, built and cultural assets. The Action Plan for Rural Development Realising our Rural Potential highlights the potential of activity tourism to contribute to economic growth in rural areas.

The Department of Transport, Tourism and Sport Policy Document People, Place and Policy Growing Tourism To 2025 makes a number of policy proposals that are relevant to the planning of tourism, namely; -

- ***Protecting heritage assets through sustainable tourism***
- ***Targeting high growth potential areas***
- ***Incorporate Cultural and Sports-based Offerings***
- ***Respecting Brand Architecture and the Environment***
- ***Need to optimise Air and Sea Connections***
- ***Need to facilitate inter-modal transport transfers***
- ***Support for Cross-Border Tourism***

8. Greenways

The Wicklow Way Hiking route is referred to on page 126 of the draft RSES under Greenways. This trail is not a greenway under the *Strategy for Future Development of National and Regional Greenways*. The previous sentence which refers to the Blessington Greenway appears to be an incomplete sentence.

It is important that the wording in the draft RSES does not confuse the greenways product with the trails product. The Outdoor Recreation Infrastructure Scheme administered by the Department of Rural and Community Development funds walking and cycling trails and some sections of national and regional greenways can be funded. It may be appropriate to include a separate section on trails to avoid any potential confusion.

Department of Transport, Tourism and Sport
23 January 2019

