

Tionól Reigiúnach Oirthir agus Lár-Tíre Eastern and Midland Regional Assembly

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Department of Transport – Draft National Investment Framework for Transport in Ireland (NIFTI)

The Eastern and Midland Regional Assembly (EMRA) notes the public consultation on the draft National Investment Framework for Transport in Ireland (NIFTI), which is the Department of Transport's new high-level strategic framework for prioritising future investment in the State's land transport network. NIFTI is the Department of Transport's contribution to Project Ireland 2040, the Government's long-term strategy for accommodating population growth in a sustainable manner and seeks to ensure that national transport strategy is underpinned by and supports the achievement of the spatial objectives and National Strategic Objectives set out in the National Planning Framework.

This submission has been prepared by the executive and approved by the Cathaoirleach of the Eastern and Midland Regional Assembly on 27 May 2021.

1.0 Context

Role of the Regional Assembly and Regional Spatial and Economic Strategy

The Eastern and Midland Regional Assembly (EMRA) is part of the Regional tier of governance in Ireland. It is focused on the formulation, adoption, and implementation of the Regional Spatial and Economic Strategy (RSES), oversight and coordination of Local Economic and Community Plans, management of EU Operational Programs, EU project participation, implementation of national economic policy and additional functions working with the National Oversight and Audit Commission. The Assembly is composed of 43 elected members who represent 12 local authorities in our Region.

In line with the provisions of the Planning and Development Act 2000 (as amended), the Eastern and Midland Regional Assembly (EMRA) made the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region on 28 June 2019. The primary statutory objective of the RSES is to support the implementation of Project Ireland 2040 – which links planning and investment through the National Planning Framework (NPF) and ten-year National Development Plan (NDP) – and the economic and climate policies of the Government by providing a long-term strategic planning and economic framework for the Region.

The overall vision of the Strategy is to create a sustainable and competitive Region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunity for all. The vision is supported by 16 Regional Strategic Outcomes (RSOs) that are framed around three key principles of Healthy Placemaking, Climate Action and Economic Opportunity. Relevant RSOs support sustainable settlement patterns, compact growth and urban regeneration, strong healthy urban and rural communities and economies, integrated transport and land use, building climate resilience and a transition to a low carbon economy and circular economy, and the promotion of international connectivity and Regional accessibility. The RSES also identifies Regional assets, opportunities and pressures and provides appropriate policy responses in the form of Regional Policy Objectives (RPOs).

The RSES 2019 – 2031 for the Eastern and Midland Region sets the spatial policy context for sustainable plan-led distribution of residential and employment development linked to the delivery of key enabling infrastructure, including transport infrastructure, for our Region. For the first time, a statutory plan - the Dublin Metropolitan Area Strategic Plan (MASP) – has been prepared for the capital city as part of the RSES. The MASP identifies a number of strategic development areas that are accessible to high-quality public transport corridors, existing and planned, along with a phased sequence of enabling infrastructure to address key infrastructure deficits and drive accelerated housing delivery and sustainable employment growth in the Dublin Metropolitan Area.

The adoption of the RSES sets the context for each local authority to review their development plans to ensure consistency with the NPF and RSES regarding a number of matters, including; promoting Regional development; planning for the best use of land having regard to location, scale and density of new development to benefit from the investment of public funds in transport infrastructure and public transport services; integrated planning for transport and land use, and the promotion of sustainable transportation strategies in urban and rural areas, including measures to reduce greenhouse gas emissions and adapt to climate change. Key state agencies and sectoral bodies will also have to consider their strategies and investment plans in light of the adoption of the RSES.

2.0 Submission

The Assembly welcomes the opportunity to engage in the public consultation on the draft National Investment Framework for Transport in Ireland (NIFTI), which will support the alignment of the Government's transport strategy with Project Ireland 2040, reflecting the spatial objectives and increased ambition for transport investment in the National Planning Framework (NPF) and underpinned by investment in the National Development Plan (NDP), which is currently under review.

The Assembly acknowledges that the NIFTI is not a plan for transport infrastructure but will provide a decision-making framework to ensure a consistent approach on future transport investment, and notes that future transport projects will have to demonstrate alignment with NIFTI and the new Common Appraisal Framework for Transport Projects and Programmes (CAF) setting out sector-specific guidance for the appraisal of transport infrastructure in Ireland.

The Assembly welcomes the reference in the draft NIFTI to the role of the Regional tier within the planning hierarchy and to the Regional Spatial and Economic Strategies (RSES) supporting the delivery of Project Ireland 2040 at a Regional level in Ireland. There could be further recognition given to the

RSES as key policy frameworks to prioritise the delivery of key enabling infrastructure and services, including transport infrastructure, by government and transport agencies. It is suggested that the identification of strategic future transport projects and programmes, as guided by NIFTI, should also be aligned with the spatial objectives and strategic transport priorities set out in the RSES and the Metropolitan Area Strategic Plans (MASP), which were prepared as part of the RSES.

To that end, this submission sets out the observations of the Regional Assembly with reference to the relevant Regional Policy Objectives (RPOs) and Guiding Principles of the RSES that enable the delivery of the following national strategic outcomes (NSOs) of the NPF; compact growth; Regional accessibility; rural economies and communities; sustainable mobility; international connectivity; and transition to low carbon, as set out in the NIFTI consultation documents, also highlighting key challenges and opportunities and strategic priorities that will guide transport investment decisions in the Region.

2.1 Compact growth

One of the key challenges facing the Region and the State is the need for more sustainable compact forms of development and to move away from urban sprawl around cities and towns, which is leading to car dependency, congestion, and negative impacts on people’s quality of life and the environment. This is reflected by NSO 1 ‘Compact Growth’ of the NPF and Regional Strategic Outcomes (RSOs) 1 ‘Sustainable Settlement Patterns’, and 2 ‘Compact Growth and Urban Regeneration’ of the RSES.

The delivery of the RSES and MASP will ensure the delivery of compact, sustainable development so that people can live closer to where they work, providing for improved housing and travel choice and more sustainable development and travel patterns that make more efficient use of urban land and maximise investment in transport infrastructure. RPO 3.2 of the RSES sets out compact growth targets of at least 50% of all new homes within or contiguous to the built-up area of Dublin city and suburbs and a target of at least 30% for other urban areas.

2.1.1 Integration of Planning and Transport Policy

The achievement of compact growth will require better integration of transport and land use planning and an alignment of spatial policy at national, Regional, metropolitan and local levels. To promote the integration of transport and land use planning in our Region, RPO 8.4 of the RSES states that *“Land use plans within the GDA shall demonstrate a consistency with the NTA’s Transport Strategy for the Greater Dublin Area and plans within or outside of the GDA shall be consistent with the Guiding Principles expressed in the RSES”*.

The hierarchy of transport and land use plans and policies are set out in Table 8.1 of the RSES below.

Table 8.1 Hierarchy of Plans and Policies	
International	The Trans-European Transport Network (TEN-T)
National	Project Ireland 2040 - National Planning Framework, Smarter Travel – A Sustainable Transport Future, Planning Land Use and Transport Outlook – PLUTO 2040 ¹
Regional Level	Transport Strategy for the Greater Dublin Area 2016-2035.

¹ It is noted that the NIFTI will replace ‘PLUTO’ as the new strategic framework for investment in transport at a national level in Ireland.

	Transport Plans for Athlone (multiple Regions), Dundalk (cross border) and Drogheda (multi-county) Dublin- Belfast Economic Corridor.
Metropolitan Area	Transport Strategy for the Greater Dublin Area 2016-2035.
County Level	Development plans, county cycling and walking strategies.
Settlement level	Settlement walking and cycling strategies, local area plans, Local Transport Plans, Local Link Rural Transport Programme, Mobility management plans.

The RSES is aligned with the NTAs Transport Strategy for the GDA, which provides a framework for the planning and delivery of transport infrastructure in the Region. Transport policies and objectives for the Midlands and County Louth, as well as the GDA, include:

- Ongoing management and enhancement of the national and strategic road networks to address the Region’s intra-Regional, inter-Regional, and international connectivity.
- Maintenance of an appropriate level of rail service and enhancements
- Provision for enhanced Regional and local bus services
- Improvements to walking and cycling provision in towns and villages; and
- Improvements to public transport provision in rural areas.

EMRA worked closely with the transport agencies, including the NTA and TII, in the preparation of the RSES and the development of Guiding Principles for integration of planning and land use and transport planning in Section 8.3 of the RSES, informing the preparation and implementation of plans, programmes and projects in the Region. Region.

The Guiding Principles for Integrated Land Use and Transport require, inter alia; sequential residential development prioritising lands that are accessible by walking, cycling and public transport (PT); focus large scale trip intensive developments in central urban locations and locations well served by high capacity PT; invest in infrastructure and behaviour change to support mode shift, having regard also to DMURs; prioritise walking and cycling and integrate permeability and cycle parking into new development/ retrofit of existing neighbourhoods; promote the ‘10 minute settlement’ concept whereby services are accessible by active travel or in larger settlements by high quality PT; support reallocation of public realm for walking and cycling in urban centres.

EMRA are currently engaging with the NTA as part of the Review of the Transport Strategy for the Greater Dublin Area (GDA) 2016-2035, which will set a long-term framework for investment in transport infrastructure and services in the GDA to 2042. EMRA are also engaging in the statutory processes of new City and County Development Plans in the GDA and the Region, which marks the beginning of the alignment of planning policy at local level with Regional and National Policy.

In order to give local expression to the Transport Strategy in the RSES, EMRA are working with the NTA and relevant local authorities in the preparation of Local Transport Plans (LTPs) for selected settlements in the Region (RPO 8.6 refers), to include (but not limited to), Athlone, Dundalk, Drogheda, Arklow, Ashbourne, Balbriggan, Longford, Mullingar, Portlaoise, Naas, Navan, Newbridge, Tullamore, and Wicklow-Rathnew and certain urban areas within the Dublin Metropolitan Area.

2.1.2 Alignment with RSES Spatial Strategy

Chapter 4 of the RSES sets out the Spatial Strategy for the Region – to promote sustainable settlement patterns, compact growth and close integration of transport and land use planning to meet the future transport needs of a growing population and expanding workforce in Ireland’s fastest-growing Region, which is projected in the NPF to increase to 2.85 million people and 320,000 additional jobs in 2040.

To manage this projected growth, the RSES Settlement Hierarchy, as set out in Table 4.2 over, identifies key locations for population and employment growth with a focus on the delivery of compact growth within existing urban footprints in Dublin, the Regional Growth Centres of Athlone, Drogheda and Dundalk and selected Key Towns across the Region supported by Self-Sustaining Growth Towns, Self-Sustaining Towns and a network of Rural Places to be defined in local authority development plans. This provides the spatial framework for the alignment of key transport infrastructure and investment throughout the Region, with a particular focus on ensuring sustainable transport mobility in the higher tier settlements.

Table 4.2 Settlement Hierarchy				
Settlement Typology	Description	Areas		
		Metropolitan	Core Region	Gateway Region
Dublin City and suburbs	International business core with a highly concentrated and diversified employment base and higher order retail, arts, culture and leisure offer. Acts as national transport hub with strong inter and intra-regional connections and an extensive commuter catchment.	Dublin City and suburbs		
Regional Growth Centres	Regional Growth Centres are large towns with a high level of self-sustaining employment and services that act as regional economic drivers and play a significant role for a wide catchment area.		Drogheda	Athlone Dundalk
Key Towns	Large economically active service and/or county towns that provide employment for their surrounding areas and with high-quality transport links and the capacity to act as growth drivers to complement the Regional Growth Centres.	Bray Maynooth Swords	Navan Naas Wicklow-Rathnew	Graigucullen (Carlow) Longford Mullingar Tullamore Portlaoise

Table 5.1 of the Dublin Metropolitan Area Strategic Plan (MASP) further identifies strategic development areas in the city centre and at key nodes along high-quality public transport corridors, existing and planned, linked to the delivery of Metrolink, Busconnects, DART + and LUAS extension programmes to provide a fully integrated public transport network in the GDA, see Figure 5.2 over. An Implementation Group has been established to promote coordination between local authorities and infrastructure providers to drive delivery of serviced sites and address key infrastructure constraints in the Dublin metropolitan area, which is planned to grow to a 1.65 million population by 2031.

The RSES also sets out Guiding Principles for the location of strategic employment development (Section 6.3 refers), based on the extent to which a new enterprise use is people-intensive or space-intensive and include access to, inter alia; suitable locations, serviced sites, strategic connectivity and access to markets, proximity to talent and skills, local strengths and clusters an attractive living and working environment. It is essential that investment decisions reflect the spatial strategy and spatial hierarchy in the RSES to allow for managed and sustainable growth that enables each place to fulfil its ambition and potential.



Fig 5.2 Dublin MASP

2.2 Regional Accessibility

The RSES Growth Strategy highlights the importance of strategic connectivity within and outside the Region, including the need to protect and enhance inter-Regional and intra-Regional accessibility to support effective Regional development and access to social and economic opportunity across the Region; see Figure 3.1.

The RSES supports enhanced rail services to the northwest on the Dublin to Sligo rail corridor, also serving Mullingar and delivering DART services to Maynooth. Improved connections to the west will be supported by planned upgrades to the national road network, including the M/N4 and development of the cross border A5 route to the N/M2, along with the development of greenways along the Royal and Grand Canals linking Dublin to Longford and completion of the Dublin to Galway Eurovelo Route.

The Dublin to Cork rail corridor is identified as strategically important, linking the two largest cities in the State and part of the EU TEN-T core network between Belfast, Dublin, and Cork. The Dublin to Cork rail corridor also provides commuter rail services to the Dublin hinterlands. The RSES supports a feasibility study for high-speed rail between Dublin and Limerick Junction/Cork and the DART extension to Celbridge/Hazelhatch in north Kildare, along with increased recreational use and links between the Grand Canal and the Barrow connecting Carlow-Graigucullen with the Southern Region.

While the RSES notes that long term protection remains for the Eastern Bypass and Leinster Outer Orbital Route, it is anticipated that the studies undertaken as part of the current review of the NTA Transport Strategy for the GDA will consider the feasibility of these long-proposed transport projects.

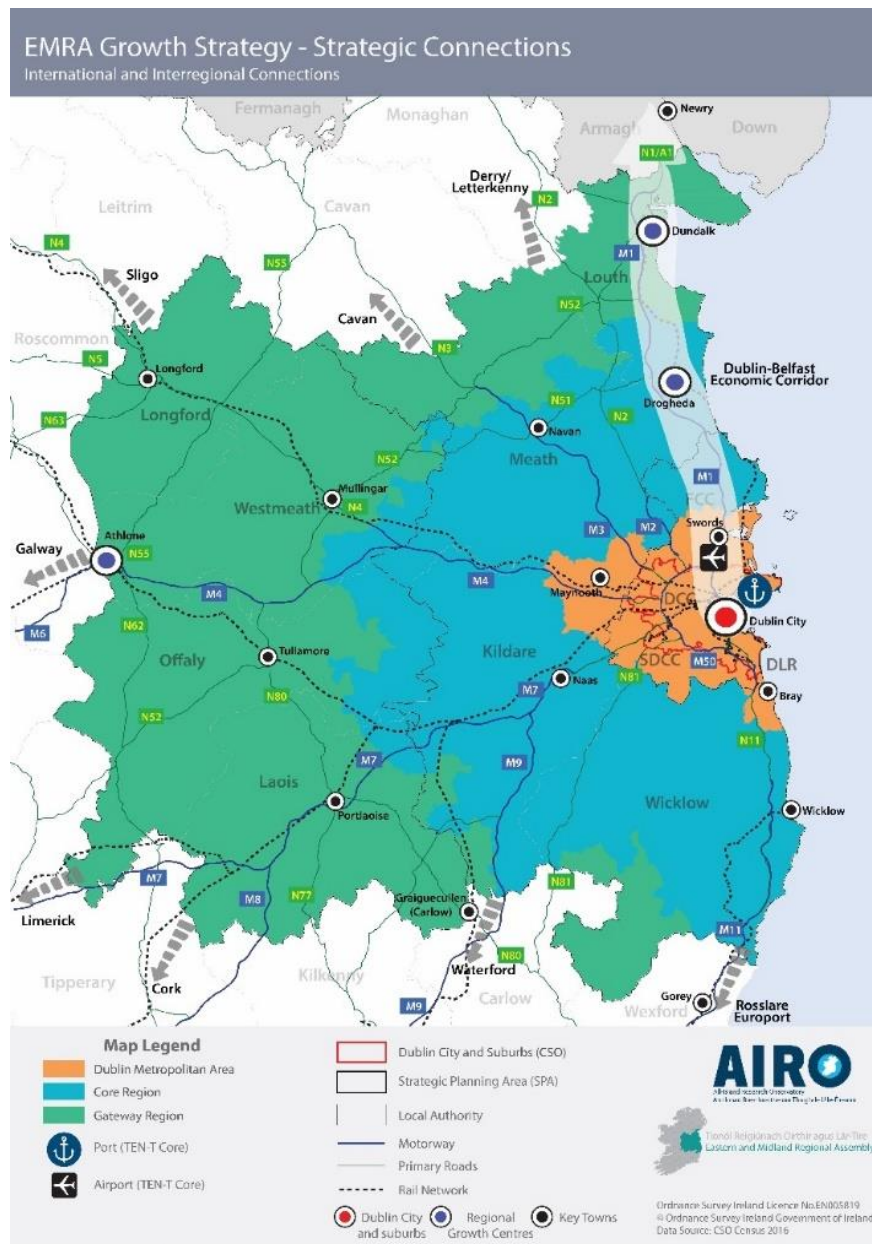


Fig 3.1 Strategic Connections

2.3 Rural economies and communities

Chapter 8 – Connectivity and Section 8.4 of the RSES recognises the role of transport in rural development and supports the provision of better local connectivity and access to services and commercial activities located in cities and towns.

The RSES highlights the importance of local link and rural services to address the shortfall in public transport in rural and outlying areas and recognises that urban-generated development in rural areas needs to be managed in such a way as to safeguard the integrity of rural areas. RPO 4.78 of the RSES supports the provision of better services and serviced sites in small towns and villages to provide an attractive alternative to one-off rural housing. Access to services, including transport services, is also

a determinant of access to social and economic opportunity and in addressing social exclusion and inequality in our Region. The development of greenways can also contribute to unique tourism offerings that support the rural economy and job creation while protecting natural assets.

The Assembly is currently working with the NTA as part of their nationwide 'Connecting Ireland' study to inform the rolling out of improved public transport across the country by providing better connections between villages and towns and linking them with an enhanced Regional network connecting cities and Regional centres nationwide. RPO 8.13 of the RSES supports the development and expansion of rural transport services by the NTA through the Local Link Rural Transport Programme. Key priorities for rural transport set out in the RSES include;

- to seek further integration with other public transport services, including HSE and school transport;
- better linkage of services between towns, villages and rural areas;
- ensure fully accessible vehicles operate on all services;
- enhance the customer experience;
- increase patronage among children and young people; and
- encourage innovation in the service.

2.4 Sustainable mobility

Chapter 5 – MASP and Chapter 8 – Connectivity sets out key policies and objectives to support a shift to active travel modes, with reference to key targets in the Government's Smarter Travel Policy, or any update thereof, in terms of mode share and permeability to be incorporated in the development of new transport policy.

The Assembly also welcome the upcoming review of Ireland's Sustainable Mobility Policy (public transport and active travel) by the Department, which will develop a new vision for sustainable mobility to meet the needs of a growing population and expanding workforce as set out in Project Ireland 2040 and to support Ireland's response to our climate action challenge. The Assembly note and welcome the Modal Hierarchies set out in the draft NIFTI, which prioritise 1. Active travel 2. Public Transport and 3. Private vehicles, which are in alignment with the Guiding Principles for Integrated Land Use and Transport set out in Section 8.3 of the RSES which identify an order of priority for walking, cycling and public transport modes to create sustainable communities.

The observations in relation to public transport and road network priorities are set out in Sections 2.1-2.3 above and Sections 2.5 and 4.0 below, and the following comments relate to the promotion of active travel as the top tier of the modal hierarchy, along with the potential for related public realm improvements and health and wellbeing benefits.

2.4.1 Active travel – walking and cycling

The RSES recognises the importance of the built environment in supporting active lifestyles, including walking and cycling, reflected by the inclusion of Healthy Placemaking as one of three Key Principles underpinning the RSES. The key priorities for walking and cycling in the RSES are set out below.

- Delivery of the cycle network set out in the NTA Greater Dublin Area Cycle Network Plan inclusive of key commuter routes and urban greenways on the canal, river and coastal corridors
- Delivery of the National Cycle Plan within the Region inclusive of the Greenway and Blueway projects
- Provide safe cycling routes in towns and villages across the Region
- Enhance pedestrian facilities in all urban areas in the Region; and
- Investment priorities for cycleways feasibility and route selection studies for cycleways shall identify and subsequently avoid high sensitivity feeding or nesting points for birds and other sensitive fauna.

RSES Guiding Principles for the Integration of Land Use and Transport in statutory land use plans require provision for new developments to be permeable for walking and cycling, and that proposals for the right of way extinguishments should only be considered where they do not result in more circuitous trips for residents accessing public transport or local destinations. In addition, the Guiding Principles for Healthy Placemaking set out in Section 9.4 of the RSES recognise the need for new schools and workplaces, in particular, to be linked to cycling networks.

The RSES further supports investment in greenways while also recognising the need to manage potential conflict between commuter and recreational use of urban greenways. RPOs 7.24 and 7.25 of the RSES support the development of a Strategic Greenway Network in line with the Department's *Strategy for the Future Development of National and Regional Greenways 2018*. Flagship national and Regional greenways in the Region include the Dublin-Galway Eurovelo Route, the Shannon Wilderness Corridor and triangular navigation route encompassing the River Shannon and the Royal and Grand Canals, the cross-border East Coast Trail, the Dublin Mountains and Wicklow Way, the Barrow and Boyne Blueways, and the Slieve Blooms and Midland peatways.

RPOs 5.2 of 5.8 of the RSES further supports the development of the NTA Greater Dublin Metropolitan Cycle Network to develop an integrated cycle network of primary and secondary routes and greenways linking the canals, rivers, docklands and Dublin Bay and an inter-urban network extending to the surrounding metropolitan towns. Strategic Greenways proposed or under development in the metropolitan area include the; East Coast Trail, Royal Canal and Grand Canal Greenways, River Liffey Greenway, Dodder Valley Greenway and the Western Canals Loop (linking the Grand Canal to the Royal Canal). There is also potential to provide local links and greenways along the Rivers Tolka, Santry, Poddle and Camac, as set out in the NTA Dublin Metropolitan Area Cycle Network.

The Assembly welcomes the increased ambition for delivery of walking and cycling infrastructure and greenways, which is reflected in the accelerated measures in response to the COVID -19 pandemic. Continued supports and investment will be needed to ensure that people are facilitated in a shift to active travel modes as an attractive alternative to the private car, particularly in light of capacity restrictions on public transport due to COVID-19. This will require investment in behavioural change interventions to reduce car dependency and encourage people towards sustainable modes of transport, both in the short and the long term. In this regard, the Assembly supports the integration of modal shift targets as set out in the Government's Smarter Travel Policy or any update thereof.

The use of Local Transport Plans (RPO 8.6 refers) to deliver a high level of priority and permeability for walking, cycling and public transport modes within settlements, and mobility management and travel plans (RPO 8.7 refers) to bring about behaviour change will also play a role.

2.4.2 Public Realm and Accessibility

Chapter 9 – Quality of Life sets out policies and objectives to ensure the planning process facilitates and delivers a more inclusive society through better design of the built environment and public realm, and through greater integration and accessibility across all societal needs, age, gender and disabilities.

Healthy Placemaking RPOs 9.10 to 9.13 of the RSES highlight the need for improvements to both physical and social infrastructure, including public realm enhancements, sustainable transport, recreation and open space, heritage-led regeneration, and the provision of community facilities and services to create sustainable, inclusive communities. Support for placemaking is embedded in the Economic Strategy of the RSS and linked to enterprise growth.

Further to this, the RSES Guiding Principles for the Integration of Land Use and Transport in statutory land use plans support investment in infrastructure and behaviour change, including promotion of the '10 minute' settlement concept, whereby a range of community facilities are accessible by walking, cycling and public transport. This is further supported by the town centre first approach in the Programme for Government.

There is also a need to invest in park and rides and upgrading bus stops and rail infrastructure to allow for universal access and comfortable interchange between modes of travel. RPOs 9.12 and 9.13 highlight the need to design infrastructure and services for a range of users, including provision for older people, people with disabilities and young children to move around with ease, avoiding separation or segregation in line with the principles of universal design. It is noted Ireland's ratification of the UN Convention on the Rights of Persons with Disabilities renewed impetus to an urgent need, including a commitment by state bodies *"to take appropriate measures to ensure to persons with disabilities access, on an equal basis with others, to the physical environment, to transportation."*

To this end, the Assembly suggests that future transport proposals be tested against gender equality, child-friendly and non-discrimination targets, and targets for mode shift towards sustainable mobility, as previously stated. The Assembly also highlights the TII 'Traveling in a Woman's Shoes' Report as a means of understanding women's travel needs and informing future transport policy.

2.5 International Connectivity

Chapter 3 – Growth Strategy of the RSES highlights the importance of international gateways, both within and outside the Region, for our economic competitiveness and addressing opportunities and challenges from Brexit through investment in and ensuring strategic connectivity and high-quality access to our ports and airports and the trans-European TEN-T network.

The Dublin-Belfast Economic Corridor is a key growth enabler for the Region and the State, and a national entry point to the island of Ireland, connecting Drogheda, Dundalk, and Newry, with major airports and ports in Dublin and Belfast. The RSES supports the improvement and protection of cross

border road and rail links between Dublin and Belfast along with enhancements to the Dublin-Wexford rail line and N11/M11 on the Eastern Corridor extending south to Rosslare Europort, which is a key strategic connection in a post Brexit scenario.

Chapter 8 – Connectivity sets out further policies and objectives to protect and improve the strategic function of the EU TEN-T Network, Dublin Belfast Economic Corridor and national road network, including higher-speed rail connections between Belfast, Dublin and Cork (RPOs 8.11 and 8.12 refer). RPOs 8.15 to 8.20 seek to protect and strengthen landside access to the international gateways of Dublin Airport, including delivery of Metrolink, and improved access to Dublin Port, including the Southern Port Access Route.

The role of Regional ports as strategic marine-related assets is recognised whilst supporting complementary economic uses, including facilitating offshore renewable energy (RPOs 8.21 to 8.24). The Assembly also supports the preparation of a Regional strategy for freight transport in collaboration with the relevant transport agencies and the other Regional Assemblies (RPO 8.5 refers).

In this regard, the Department may wish to maximise the opportunity for funding through the EU ‘Connecting Europe Facility’ funding instrument in the coming years, particularly to prepare feasibility studies to implement TEN-T core network projects.

2.6 Climate action/low carbon

Chapter 7 – Climate and Environment of the RSES set out the commitment to support the transition to a low carbon, circular and climate-resilient Region, and this is reflected by the inclusion of Climate Action as one of three Key Principles in the RSES.

Well-planned settlements can ensure that sustainable travel patterns are established to reduce the need for unnecessary private car journeys – and the associated CO₂ emissions - to support climate transition. The Climate Strategy is underpinned by spatial policies in the RSES to ensure we make more efficient use of urban land and the Transport Strategy in the RSES, which promotes mode shift towards low-carbon alternatives such as public transport, increased walking and cycling and promotion of greater efficiency in the use of our transport networks.

The Climate Strategy sets out policies for the decarbonisation of energy, building and transport sectors and to ensure the resilience of critical infrastructure that is capable of withstanding, adapting and recovering from extreme weather events (RPOs 7.35 to 7.43 refer), for example, coastal rail lines. The decarbonisation of transport will be supported by a transition to electric and low emissions vehicles in the national car fleet and for public transport and local authority fleets and the use of low carbon/biofuels in line with the National Policy Framework on Alternative Fuels Infrastructure for Transport in Ireland.

Green public procurement policies should support the uptake of low emission vehicles as recognised in the Clean Vehicles Directive. RPO 7.42 requires local authorities to include proposals in statutory land use plans to encourage an increase in electric vehicle (EV) use, including charging infrastructure and prioritisation of parking for EVs in central locations

The Assembly also supports reversing the traditional vehicle-dominated road hierarchy to favour non-motorised traffic, the reallocation of road space for people, reduced motorised vehicle speeds in urban centres and the potential for public realm improvements in line with the Design Manual for Urban Roads and Streets (DMURS).

There are opportunities to integrate natural solutions into the design and management of transport infrastructure, including wild verges along transport corridors and the integration of permeable surfaces and green roofs on transport infrastructure and associated buildings to support biodiversity, in line with the All-Ireland Pollinator Plan.

There are also opportunities to apply circular economy principles from the outset of projects, in line with RPO 6.23 of the RSES and to take whole of life cost and resource efficiency into account at all stages from procurement to the optimisation of assets and reuse of materials in construction and maintenance of transport infrastructure.

2.6.1 Emissions reductions targets

EMRA supports the increased ambition to tackle climate change in the Climate Action and Low Carbon Development (Amendment) Bill, which commits Ireland to net-zero carbon emissions by 2050 with 7% annual reductions and an interim target of a 51% reduction in GHG emissions by 2030. With national emissions still rising, there will be a need for accelerated climate action to bring about the transformative change needed over the next decade and beyond.

The RSES commits to monitor progress in this transition to zero carbon, and RPOs 7.30 and 7.31 set out that EMRA will work with stakeholders, including the NTA and Climate Action Regional Offices (CAROs), to carry out an assessment of transport emissions in the Region and agree with reduction targets in accordance with agreed national sectoral plans and to achieve and maintain good air quality particularly along transport corridors (RPO 7.7 refers).

RPO 3.6 requires that city and county development plans shall also undergo an assessment of their impact on carbon reduction targets and include measures to monitor and review progress. To this end, EMRA is leading an ESPON EU research programme (QGasSP) to identify a robust method for quantifying the relative GHG impacts of alternative spatial planning policies, the outputs of which are anticipated by the end of 2021 and should assist in developing measurable strategies for planned modal shifts towards 2030 interim targets and 2050 net-zero targets.

With regard to the need for accelerated climate action to realise the Government's commitment to net-zero carbon emissions in Ireland by 2050, there should be consideration of the integration of measures for testing the impact of transport projects against agreed targets for the reduction of greenhouse gas (GHG) emissions.

3.0 Challenges and opportunities

The NFTI will need to reflect new national policies on climate action and low carbon legislation and to address both the short and anticipated long-term impacts of the Covid-19 pandemic as well as ongoing Brexit impacts. Transport Strategy will also need to build in flexibility to respond to changes in the

economy and investment policies, to new and emerging technologies, and to take advantage of any new social, economic and environmental opportunities arising from disruptive change.

3.1 COVID-19 response – urban regeneration and placemaking

The Regional Assemblies carried out a nationwide analysis² to identify which urban centres are most exposed to economic disruption caused by COVID-19 in order to inform targeted measures to compact declining footfall and supports for sectors that have been particularly exposed to COVID. The analysis found that coastal and rural areas are more likely to be severely impacted, with the highest exposure (over 50% of commercial units) in Westmeath, Meath and Longford. Relative exposure is expected to be lower in urbanised areas with a more diversified economic base; nevertheless Dublin – in absolute terms – had the highest number of 14,360 commercial units in the sectors likely to be severely impacted.

Our cities and larger urban settlements are – and will remain – centres of creativity, innovation and economic growth acting as economic drivers for the Region and State; however, they have been severely impacted by the COVID pandemic. To address the impact on commercial centres, there is a need to ensure investment in transport infrastructure and services are aligned to the RSES spatial policy objectives, to support the regeneration of strategic development areas and opportunity sites in key locations that are identified in the MASP and the RSES and deliver revitalised mixed-use centres that are accessible by walking, cycling and public transport.

There will also be a need for continued support for COVID-19 related accelerated measures such as walking, cycling and placemaking initiatives across our settlements to improve accessibility, permeability and the public realm and to develop new and enhanced experiences in our commercial centres, in consultation with residents, business owners and other stakeholders. Public realm and active travel interventions should also incorporate monitoring measures to inform the implementation of permanent solutions where clear quality of life, regeneration and sustainable mobility benefits are identified, and support the delivery of strategic policy objectives, including the National Cycle Plan, National and Regional Greenways and Dublin Metropolitan Area Cycle Network.

3.2 Remote working and co-working hubs

The transport sector will need to respond to changes in travel patterns that emerge from the COVID-19 pandemic. An accelerated shift towards flexible and remote working in response to COVID-19 will play a role in reducing the demand for work-related commuting. The three Regional Assemblies carried out a 'Regional Co-working Analysis'³ to assess the potential impacts and opportunities of a shift towards co-working and remote-working, and potential decrease in the number of commuting trips to large urban centres in the Region.

The last 18 months have shown that accelerated change towards more sustainable ways of living and working is possible. By supporting remote working, policymakers could help provide a wider range of

² <https://emra.ie/covid-19-regional-economic-analysis/>

³ <https://emra.ie/dubh/wp-content/uploads/2020/10/Regional-Co-Working-Analysis-16112020.pdf>

options for workers and businesses. This includes allowing some workers to live and work in geographical areas of their own choice, reducing business costs, with staff retention and wellbeing benefits, access to a greater pool of talent, reducing traffic congestion, enhancing the quality of life and reducing the level of greenhouse gas emissions from car usage.

The roll-out of rural broadband and rapid shift towards remote working opens new opportunities for rural regeneration and diversification of local economies supported by targeted investment in serviced sites and improved connectivity to drive enterprise development. In this regard, the development of urban centres of scale continues to be a crucial component in addressing Regional imbalances, and remote working has the potential to enhance the growth prospects of our Metropolitan Areas, Designated Regional Growth Centres and Key Towns, as defined by the RSES Spatial Strategy. The Regional Assembly supports enhanced investment to develop a network of high-quality co-working hubs of scale within or in close proximity to the designated centres and prominent rural communities.

There are also opportunities to develop a network of innovation and enterprise hubs in collaboration with higher education and research centres to drive the development of smart cities and towns in our Region (RPO 6.30 refers).

In the long term, the degree to which the Region can capitalise on these potential benefits will depend on a variety of factors - including but not limited to – the availability of co-working hubs with the provision of high-quality facilities and connectivity within and between such hubs including sustainable transport connections as well as high-speed broadband.

3.3 Future-proofing

Transport policy will need to respond to changing economic and demographic trends, new and emerging technologies and changing travel patterns as we transition to more sustainable ways of living and working, and to leverage the role of transport in improving the attractiveness of places for people to live, work and visit and to drive economic development.

Trends towards micro-mobility and electromobility, including e-bikes and e-scooters, should be considered, along with emerging technologies that support better journey planning, demand management options, new models of car-share and bike-share, and ‘mobility as a service’ applications. The development of smart infrastructures that integrate digital technology can support connected transport systems and greater integration of ticketing and services, and the use of sensors to collect information on traffic flows and mode share can drive data-driven efficiencies, increase safety and support better policy and decision making.

To support the transition to low carbon, the Assembly supports increased investment in walking and cycling, rail and bus networks. It recognises the need for significant investment in demand management and mode shift measures to reduce overall dependency on private vehicles for our transport needs. Increased take-up of zero and low carbon vehicles will need to be supported by a transition to clean and renewable electricity in Ireland’s transport fuel mix and the roll-out of EV charging infrastructure to meet the expected growth of electric vehicles in the coming years.

Demand-side measures identified in the RSES Guiding Principles for Integration of Transport and Landuse include a shift from minimum to maximum car parking standards for all non-residential development proposals and the application of caps on car parking on an area-wide basis where the highest density of development occurs. The Guiding Principles also state that where investment in additional road capacity is provided within or around any town, there should also be a reallocation of road space to sustainable modes in central areas and immediate environs of the town. Analysis of road infrastructure proposals needs to include consideration of, and comparison with, non-infrastructure alternatives, including charging and other demand management. In this context, the Assembly also welcomes the Department's recent Five Cities Demand Management Study Recommendations Report.

4.0 Transport Infrastructure Investment

Proposals for infrastructure investment should clearly demonstrate their consistency with spatial planning objectives at the national and Regional level. Major transport infrastructure investments, identified in the Project Ireland 2040 - National Development Plan (NDP) 2019-2027, which is currently under review, have a key role in enabling sustainable and balanced development in the Region. The RSES and MASP further provide a long-term spatial policy framework to direct investment in transport infrastructure and services and support delivery of Project Ireland 2040 at a Regional level.

The Regional Assembly note the Intervention Hierarchy, which is set out in the NIFTI and seeks to firstly maintain the existing transport network, then to optimise use of the network, followed by improvement of the infrastructure and finally, provision of new transport infrastructure capacity. The Assembly also note the investment priorities in the NIFTI report, including 1. Decarbonisation; 2. Protection and Renewal; 3. Mobility of people and goods in urban areas; and 4. Enhanced Regional and Rural Connectivity and considers that the RSES supports the delivery of projects that align with the above hierarchy and priorities, as set out in observations in the above sections and below.

While it is recognised that the NIFTI is not an investment plan, it is suggested that the assessment of future transport projects and programmes should include the need for alignment with the RSES Settlement Strategy set out in Table 4.2, the Guiding Principles of the Strategy and the Transport Investment Priorities set out in Tables 8.2 to 8.5 (RPOs 8.8 to 8.14) of the RSES, which support the delivery of strategic rail, bus, road, and interchange projects for the Region including;

- Delivery of key public transport projects within the Dublin Metropolitan Area - Bus Connects, Metrolink, DART + and LUAS extension programmes, new park and rides and stations to provide interchange as part of the integrated transport network, with an appraisal for further extensions to Metrolink and LUAS as part of the Review of the GDA Transport Strategy.
- Delivery of key rail projects in the Region - including feasibility for high-speed rail between Dublin-Belfast and Dublin-Limerick Junction/Cork; undertake appraisal for an extension to the Dunboyne/M3 Parkway line to Navan; construction of the National Train Control Centre; provide an appropriate level of commuter rail service in the Midlands and South-East.
- Delivery of key bus projects in the Region include; delivery of Regional Bus Corridors connecting major Regional settlements to Dublin; Bus network reviews for the Dublin

Metropolitan Area and largest settlements, with a view to providing local bus services; Review of bus services to small towns and villages and the rural transport programme.

- Ongoing management and protection of national road networks and delivery of key national road projects, significant Regional road schemes and local relief roads, which will be brought forward as a means of reallocating road space in urban areas to sustainable modes.
- Provision of transport in rural areas, working with the NTA to develop and expand the Local Link Rural Transport Programme to seek further integration with other public transport services and better linkage of services between towns, villages and rural areas.

It is recognised that the significant investment in public transport will need to be supplemented by demand management and behavioural change measures to achieve sustainable mode shift and carbon reduction targets. It is considered that assessment of future transport projects and programmes should include a cost-benefit analysis that includes climate change, placemaking and public health benefits, also looking at the costs of inaction and analysis of smaller-scale projects including consideration of 'first mile' and 'last mile' to public transport and investment in high-quality interchange facilities to facilitate multi-modal journeys.

As part of a process to review a statutory document, it is considered that good governance is key to delivering effective transport infrastructure and services, particularly having regard to the multiplicity of transport agencies in Ireland. The NIFTI framework should consider the governance structures in transport planning, including the role of the transport agencies and local authorities in the delivery of the framework's priorities, and should also support the initiatives of the Climate Action Regional Offices (CAROs) and the establishment of Active Travel teams within all local authorities, supported by the NTA Regional Cycle Design Office.

The NIFTI framework should also recognise the role of Regional Assemblies in planning for and coordinating integrated land use and transport planning in the Regions and through the Metropolitan Area Strategies.

5.0 Conclusion

In conclusion, the members of the Assembly acknowledge the iterative process of engagement with the Department of Transport and transport authorities to date in the preparation and implementation of the RSES and MASP and welcome the opportunity to engage in the Draft National Investment Framework for Transport in Ireland (NIFTI).

The Assembly notes a number of transport policy reviews that are currently ongoing including the Department's 'Strategic Rail Review', which considers all-island connectivity between cities and Regions, the multi-modal review of the 'NTA Transport Strategy for the GDA' and the NTA 'Connecting Ireland' study to improve Regional and rural accessibility, and highlights the need for good governance and engagement structures to facilitate inputs by key stakeholders including the Regional Assemblies, and to achieve policy integration between these review processes.

To that end the Assembly looks forward to continuing engagement with the Department and the transport agencies in the development and delivery of strategic transport projects in the Region.
Region.

Regards,

A handwritten signature in black ink, appearing to be 'J. Conway', written in a cursive style.

Jim Conway Director
Eastern and Midland Regional Assembly
May 27th 2021