

NPF Submissions,
Forward Planning Section.
Department of Housing, Planning, Community
& Local Government
Custom House
Dublin 01 W6XO

3rd November 2017

Iarnród Éireann Submission to Ireland 2040 Our Plan –
(Draft National Planning Framework)

Dear Sir/Madam

Thank you for the opportunity to respond to the current consultation phase of the Draft National Planning Framework – Ireland 2040 Our Plan.

Iarnród Éireann very much welcomes the Draft Plan which we have reviewed in detail. With national population and employment forecast to grow by c. 1m and 0.6m respectively over the plan period, there are challenges as well as opportunities for many stakeholders ahead. Iarnród Éireann as the national railway operator is well positioned to play a key role in providing a high capacity sustainable public transport solution to cater for the expected increase in travel resulting from this anticipated future growth. Given that railways are energy efficient and low producers of greenhouse gases, the railway can also play a key role in the parallel National Mitigation Plan, by delivering on National Climate Change targets.

Iarnród Éireann welcomes the emphasis in the Draft NPF on co-ordinated planning and delivery for ‘compact, smart growth’ via:-

- Establishment of an independent Office of the Planning Regulator (OPR)
- Statutory backing and including regular review and update, reflecting changing circumstances and in line with city and county development plan review cycles,
- Regional Spatial and Economic Strategies (RSES) for the three regions,
- Metropolitan Area Strategic Plans (MAPs) with a 12 year horizon and involving active participation by key stakeholders,
- Strengthening the current local area plan (LAP) legislation,
- More streamlined approaches to zoning land for development in line with infrastructure provision
- 10 Year National Investment Plan for 2018 - 2027
- Strong All Ireland Partnership including emphasis on Dublin – Belfast economic corridor

We welcome the emphasis on concentrated development including brownfield sites and sites located adjacent to public transport nodes and on the green agenda, to include a greater role for public transport and ‘enhanced active travel’ (cycling and walking), the electrification of the transport modes and the support for the DART Expansion Programme in the greater Dublin area, which will also deliver significant regional and national transport benefits.

We agree with the central pillars of the Draft NPF that it should focus on:-

1. Growing our regions, their cities, towns and villages / rural fabric

2. Building more accessible urban centres of scale
3. Deliver better outcomes for communities and the environment, through more effective and coordinated planning, investment and delivery

The railway can make a very significant contribution to the delivery of these policy pillars. However we are concerned that the draft NPF as currently written does not contain a clear vision of the future role of the railway to facilitate this. The rail network should be regarded as a valuable national asset which the State has invested in over many decades. There is a need for stronger recognition in the NPF of the railway's potential contributions to connectivity and sustainability. The key points of note in this respect are set out below.

- A European Commission Annual Report for Ireland 2016 warns that the Government's capital spending programme is inadequate for the country's needs. It highlights public transport as a key weakness, particularly in the car-dependent Dublin region. The rail network is a key mode of public transport providing high capacity local, regional and inter-urban rail services throughout the country. It is widely acknowledged internationally that railways provide significant social, economic and environmental benefits. Rail has the greatest potential for attracting motorists from cars and contributing to more sustainable mode splits, a central objective in 'Smarter Travel'. To fully realise this potential it is imperative that sufficient funding is provided to ensure that the rail network in Ireland continues to provide a key role for the nation's mobility. The consequences of an under-funded rail network are a deteriorating network, with safety issues mitigated by slower services or cessation in services, subsequent reduction in passenger numbers resulting in a cycle of decreasing revenues to the company and a reduction in the benefit to the state of the investments already made in fleet and track.
- The NPF's support for the DART Expansion programme is very welcome given its central importance in the NTA's transport strategy for the greater Dublin area. However the NPF should strongly emphasise the critical importance of delivering this as a high priority in support of more compact development in the greater Dublin area and more sustainable transport in terms of public transport mode share and supporting the green agenda. The scope for DART Underground to integrate all of the transport modes in the greater Dublin area (bus, commuter and regional heavy rail, LUAS and Metro) should be fully exploited in recognition of the very substantial local, regional and national benefits that it will deliver. The DART expansion programme could uniquely support high density developments at key locations throughout the GDA in support of the NPF's laudable land-use objectives. A clear commitment to the early delivery of the programme is key to this.
- There is no clear recognition in the draft NPF report of the role that the railway can play in the mix of transport services for the provincial cities. At a minimum this should be flagged as being worthy of detailed consideration in the various Metropolitan Area Strategic Plans in support of more compact settlement strategies for these areas and in pursuit of the green agenda.
- Iarnród Éireann welcomes the NPF's support for the Dublin – Belfast – Cork rail spine. However the plan is silent on the other InterCity routes and their possible contributions to

the NPF's objectives. The key issues that should be specifically referenced for all routes are more competitive journey times, removal of bottlenecks and system electrification in parallel with fleet replacement and expansion for additional services. This is particularly important given the competitive disadvantage imposed on the railway following the completion of the motorway network. There is only a broad reference to 'new technologies such as electric vehicles and introduction of electric and hybrid traction systems for public transport fleets in the NPF report'.

- The NPF is silent regarding the role of the lightly used regional rail lines and particularly in the context of ongoing and planned improvements to the road network. The report should highlight minimum population densities and distribution for various transport modes to ensure appropriate service provision, and also to inform future planning in the context of Regional Spatial and Economic Strategies.
- The draft NPF report is silent on the possible contribution of rail freight and particularly in the context of improved access to the three Tier 1 ports (Dublin, Cork and Foynes). While recognising the low overall market share of rail freight, it should be acknowledged that there are niche bulk markets that could be exploited by the railway with the assistance of policy and financial support to encourage a shift from road to rail.
- While the importance of the Dublin – Belfast economic corridor is highlighted in the NPF the railway's development contribution to this corridor, which is a key core element of the TEN-T network, should be highlighted. There is significant scope to generate economic benefit through improvements to the Enterprise in terms of faster and more frequent journeys, as proposed by Iarnród Éireann and Translink jointly. In addition, this corridor has a far higher concentration of rail stations (InterCity, regional and commuter) on both sides of the border than any other corridor in the rail network. The railway also offers a unique opportunity to connect Dublin airport, via a short spur, to all of the key population centres served by these stations.
- Iarnród Éireann welcomes the NPF's support for rail access to Dublin airport including a heavy rail connection. However in the context of ongoing rapid expansion of the airport as the major gateway to Ireland, the importance of the airport for the whole island of Ireland including the critically important Dublin – Belfast economic corridor, the TEN-T policy of connecting core EU airports and rail links, and experience at other major airports, it is Iarnród Éireann's view that this should be supported by a more explicit recommendation. This is critical for the preservation of the alignment, even if delivery is in the longer term, as has been the case for the north runway.

It is Iarnród Éireann's view that the NPF should inform the 10 year National Investment Programme (NIP) rather than the other way around. It is hoped that the priorities of the NPF in terms of delivering more compact and sustainable developments will be clearly reflected in the NIP.

In light of the points raised above, Iarnród Éireann would like to see a clearer vision of the railway contained in the NPF highlighting the key points set out below which can support two key elements of the NPF 2040 Vision:-

1. ***'More and sustainable choices and options', and***
2. ***'Significant improvement in local and international connectivity that underpins the competitiveness and quality of life of our people, businesses, communities and regions'.***

Proposed NPF 2040 Vision for the Railway

- The railway is an attractive alternative to the private car. It can deliver even further benefits if it is supported by:-
 - Measures to deliver more competitive journey times along the key intercity routes.
 - Measures to deliver additional frequencies within the commuter belts
- The railway can support more compact and sustainable developments.
 - This is particularly the case in the greater Dublin area subject to the delivery of the DART expansion programme.
 - There may be more limited opportunities in the provincial cities subject to the Metropolitan Area Strategic Plans.
- The railway can contribute greatly to improved international connectivity to the island of Ireland for both business and tourism in support of regional development which will be particularly important in a post Brexit context.
 - Rail freight connections to the Tier 1 ports (Dublin, Cork and Foynes) and the Tier 2 ports (Rosslare Europort and Belview),
 - Improved service offering on the Dublin – Belfast corridor including 1hr 30 mins journey times
 - A rail connection to Dublin airport initially linking into the Dublin – Belfast economic corridor (including DART) and ultimately the wider rail network.
- The railway can make a significant contribution to Ireland's green agenda and the National Mitigation Plan:-
 - Modal shift from the private car and particularly in the context of forecast increase in population and jobs.
 - Electrification of the national rail network.

We look forward to actively participating in the delivery of the NPF and we would welcome the opportunity to play active roles in the development of the various Metropolitan Area Strategic Plans and Regional Spatial and Economic Strategies.

Iarnród Éireann would be happy to discuss these issues with you further if you considered it helpful.

Yours sincerely,

David Franks, CEO
Iarnród Éireann