



**05<sup>th</sup> November 6, 2017**

### **National Planning Framework Submission**

The Irish Road Haulage Association is the recognised representative body of the licensed road haulage industry in the Republic of Ireland. The Association is pleased to be invited to make a submission to the NDF 2040.

Firstly, by its very nature the haulage industry is about moving freight around the country and on and off the island of Ireland in the most efficient and cost-effective way available at the time. The variety of goods carried is almost endless from aggregates to computers but the common denominator is the network of roads that connect us all to our base and our source of work and our destinations or ports, the latter could be for import or export. The seamless trading relationship we have been enjoying for the last twenty years with our EU neighbours has been instrumental in the development of vastly improved efficiency in the delivery of time critical product which this economy is built on, it is therefore extremely difficult to devise a planning strategy for transport going forward when we still do not know what rules will apply with our nearest neighbour and particularly with the internal border with Northern Ireland.

However, no matter what type of UK frontier we may have does not deter from the importance of continuing the development of our motorway network to all regions of the country. Cork to Limerick is a glaring gap in the connectivity of our southern cities and must be prioritised. Having said that, the same motorway must then proceed from Tuam northwards right to Sligo and Donegal, and not just south Donegal but all the way to the border at Derry. Sligo to Dublin would be another natural progression over the next few years. Correcting the present infrastructural deficit in the regions is the only way to encourage development and investment there. It should be as attractive to move the factory as to move the workforce, which is what is happening now. Commuting is destroying lives and trying to live near the centres of employment has become totally unaffordable. The uncertainty in our future trading relationship with the UK makes it particularly difficult for our members in the North West, as the only viable route for them to take when doing business with Dublin and further south is of course via the A5 and therefore transiting a different jurisdiction. Over the last twenty years this transit route has been made simple since the absence of any customs control, all that will change in less than two years' time if the UK's plans to exit the EU by April 2019 are fully implemented. It is our view that whatever about "special status" for Northern Ireland in such an eventuality, most certainly this government will have to look at Donegal in particular as being in need of "special status" as that county will be the most severely disadvantaged as a result of something that they had no hand act or part in. This government has already invested in upgrading the A5 and has pledged millions more and work is due to start in 2018, this must not be put in jeopardy even though it will now be further complicated, as dealing with a non-EU jurisdiction and will surely not be so simple. In any case "transit" traffic to and from Donegal and

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Dublin will surely have to be given the most frictionless and seamless passage as anything that further marginalises the North West and makes that region less competitive in attracting investment will need to be given the highest priority.

As an Island nation with an export driven economy our seaports and their efficient development over the next 25 years is of the utmost importance to the haulage sector which we represent. We are aware that our nearest and biggest trading partner will most likely in the next two years impose new customs procedures for the movement of goods between our two countries, plans must be put in place immediately to facilitate what will inevitably cause delays and queues for clearance. It should be noted that for the north west of Ireland including Donegal, Leitrim, Sligo, Roscommon and Mayo the clear majority of coal, oil, gas, timber, animal feed and fertilizer enters the country through one or other of the deep-water ports of Derry or Belfast, at present no other port nearer can provide the bulk cargo handling facilities they can. For the continental trade we must focus our attention on more direct shipping routes the likes of Dublin- Rotterdam-Zeebrugge which has already started. Facilities at Rosslare need to be upgraded as well to make the elimination of using the UK landbridge route more feasible and affordable.

Sustainable means of transport is very topical at the moment but without proper incentives to move to other sources of power things will be slow to change but change they must certainly in the period to 2040 as 'peak-oil' will be history by then and alternatives will have to be found. Up to now previous governments have failed to recognise this and we are aware of one member who converted his fleet to run on 'bio-oil' at great expense years ago found that due to taxation and lack of funding at the processing stage changed back to fossil fuel. Another member in north Donegal was growing twenty acres of short rotation willow to be used for biomass but because of lack of support now has the land back into grass for milk production to generate more methane gas! Sustainability must be a big part of the NFP and with the best climate in Europe for growing wood why not use it for community heating systems and build our schools, hospitals, factories, farm co-ops around such a plant. Plenty of work for the haulage industry in the production of biomass and timber products. Electric cars might become more common but we need more power points for what would hopefully be the supply of sustainable electricity, now it is even hard to find a filling station with the right 'add-blue' for the Euro 6 engines that we must buy and these must also be tax and toll incentivised as they are in other European countries.

The maintenance of whatever road network must always be at the forefront of any plan and never was it made clearer than in the recent unprecedented flooding in Inishowen which virtually cut off an entire peninsula the size of County Louth in a matter of hours. Only now is some of the regional roads reopening and it will be at least a year before normal movement of HGVs resume. The fact that in this country we have pre-cast concrete companies as good as anywhere in the world helped to get the most vital connections re-opened within a week only because the council could source enough giant culverts from two suppliers stock at short notice. Perhaps as this flooding event could happen at any time in any

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county it might be prudent that the manufacturers of such culverts could be subsidised in some way to always have a minimum of half a dozen in stock so that a collapsed bridge might be reinstated as quickly as possible as prolonged alternative routes could create life or death situations in the case of ambulances and fire appliances.

One of the 'buzz-words' doing the rounds recently is the 'digital hub' where good broad-band connectivity attracts the digital industry to grow anywhere in the regions, 'transport hubs' are also vitally important and every encouragement must be given to the co-ordination of the logistics industry which is instrumental in minimising the empty running of trucks with added pollution and congestion. our industry would question the recent changes to the height limit of our trailers as it now takes five trucks to take what three trucks could hold of what could be extremely lightweight material such as insulation, toilet rolls or cereals again more congestion and pollution.

Thank you for allowing us to make a submission to the NPF and if there are any points that you would like to clarify do not hesitate to contact us.

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