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NPF Submissions,
Forward Planning Section,
Department of Housing, Planning,
Community and Local Government,
Custom House,
Dublin D01 W6X0.

Date: 10th November 2017

Dear Mr. Hogan,

The Draft National Planning Framework (NPF) is a much welcomed document which provides a strategy for the development of Ireland to 2040. From TII's perspective, as a provider of transport infrastructure and services, the NPF will provide the framework for identifying investment needs in national road and light rail infrastructure in order to underpin NPF objectives.

Following an evaluation of the current Draft NPF, TII has identified four key themes which we consider require further consideration prior to finalising the National Planning Framework, as follows:

1. Challenges for the Delivery of Transport Infrastructure and Services;
2. Recognising Enhanced Regional Accessibility;
3. Clarification Matters within current text ;
4. Need for Active Future Engagement.

TII has prepared the attached report based on these themes to assist the NPF team in finalising the National Planning Framework. We are available to discuss the points outlined in this submission at your convenience.

Yours sincerely,



Michael Nolan
Chief Executive

National Planning Framework 2040

Consultation Submission
from
Transport Infrastructure Ireland

November 2017



National Planning Framework 2040

Consultation Submission

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1. Introduction

TII's primary mission is to provide high quality transport infrastructure and services, delivering a better quality of life and supporting economic growth. The Draft National Planning Framework (NPF) is very welcome as it provides a strategy for the development of Ireland to 2040. The document when adopted should provide the framework for identifying existing and future investment needs in national road and light rail infrastructure in order to underpin National Planning Framework objectives.

Following review of the current draft document, TII has identified four key themes relevant to its functions which we consider require further clarification prior to finalisation.

The themes are as follows:

- 1) **Challenges for the Delivery of Transport Infrastructure and Services;**
- 2) **Recognising Enhanced Regional Accessibility;**
- 3) **Clarification Matters within Text**
- 4) **Need for Active Future Engagement;**

TII has prepared this report to discuss these themes and to propose recommendations to assist the National Planning Framework Project Team in finalising a robust the National Planning Framework.

2. Challenges for the delivery of Transport Infrastructure and Services:

2.1 Acknowledging Existing Commitments

TII advises that there is a need to acknowledge and build on existing commitments included in *Building on Recovery: Infrastructure and Capital Investment (2016 – 2021)* and principles proposed in *Investing in our Transport Future - Strategic Investment Framework for Land Transport*, DTTAS 2015.

TII observes that the National Strategic Outcomes for the National Investment Plan identify a number of specific traffic management measures, enhancements and upgrades related to national roads. It is also noted that national road projects included in *Building on Recovery: Infrastructure and Capital Investment (2016 – 2021)* are not all reflected in the current Draft National Planning Framework.

TII understands that Government commitment remains to the national road and light rail projects included in Building on Recovery and that these will be included in the finalised National Investment Plan (2018-2027). These projects are currently being progressed through planning, design and construction and should be included in a finalised document.

Recommendation

The final National Planning Framework should acknowledge existing Government commitment to projects included in Building on Recovery and which will be included in the finalised National Investment Plan (2018-2027).

2.2 Sustainable Mobility

TII is wholly supportive of the focus on sustainable transport in the Draft Framework.

As an infrastructure provider for both light rail and national road projects, TII advises that the current text of the Draft Framework creates a risk that 'sustainable transport' may be interpreted solely as public transport services/infrastructure. TII also notes a disconnect between the text relating to Sustainable Mobility in **Section 9.1** of the Draft Framework (page 124) and the National Strategic Outcomes relating

to Sustainable Mobility (page 135). The former concentrates on emissions and the latter on physical infrastructure. These factors emphasise the risk of individualising elements of sustainability within the Draft Framework itself for the delivery of National Planning Framework National Policy Objectives and National Strategic Outcomes such as road schemes.

Accessibility and sustainable mobility focus on the quality and efficiency of reaching destinations. Our goal as a nation must be to create universal access to safe, clean and affordable transport for all that in turn may provide access to opportunities, services, goods and amenities. Sustainable mobility has different interpretations in an urban and rural context. At the simplest level, roads can be an integral part of a sustainable transport system and in many cases private car travel is the most sustainable mode in the transport system.

National roads provide essential intra and inter regional accessibility, international accessibility and address peripherality. The national road network provides critical access to markets sustaining economic performance, enabling economic growth and providing access to health facilities, education and other critical services which are concentrated in urban areas of scale. National roads strengthen the country's resilience to social, economic and environmental risks.

As part of a wider sustainable transport system, there will be significant reliance on the national road network to facilitate many stated National Planning Framework National Strategic Outcomes such as Sustainable Mobility (e.g. Strengthen public transport connectivity between cities and large growth towns in Ireland and Northern Ireland with improved services and reliable journey times), Empowered Rural Communities (e.g. Investment in maintaining regional and local roads and strategic road improvement projects in rural areas to ensure access to critical services such as education, healthcare and employment) and Access to Quality Childcare, Education and Health Services (e.g. Accessibility to Acute Hospital Services).

Sustainable development as an established principle is clear throughout the Draft Framework. It is also acknowledged as a cross sectoral requirement. TII considers that there is an opportunity to clarify and further embed a wider sustainable transport principles approach in the Draft Framework prior to adoption to reflect the needs of regional, urban and rural communities rather than relying on the current rather narrow definition.

For example, while reducing car dependence and attendant commuting is one element of an approach to achieving sustainable transport, so too do measures such as reducing or decarbonising the national transport fleet, appropriate demand management measures and intelligent transport systems. The National Planning Framework has an opportunity to embed a wider approach in policy, particularly having regard to the 2040 horizon of the Framework.

Elsewhere in the Draft Framework, **Section 1.1**, text related to Connectivity outlines that '*it is a reasonable target for most people to have no more than a 30 minute commute time to work...*'. In TII's opinion, this target reinforces existing commuting patterns and does not aim at managing the demand for travel and conflicts with outcomes expressed in the national policy objectives and strategic outcomes.

TII consider that there is an opportunity to clarify the interpretation, co-ordinated integration and application of sustainable mobility principles and to integrate these principles across the Draft Framework.

Recommendation

It is of critical importance that the final National Planning Framework explicitly acknowledges:

- 1. The national road network (or identified strategic road networks) as a critical enabler in facilitating the sustainable national transport system, both in terms of efficient use of, and investment in, the existing network and proposals for new connectivity and links.*
- 2. The importance of the national road network in providing regional connectivity, addressing peripherality, empowering rural communities and facilitating access to critical services such as education, healthcare, employment and enterprise.*
- 3. In an urban context, managing congestion around cities, and the contribution such measures can make in reducing car based commuting and incentivising alternative modes of travel could also be more explicitly included in the Framework. This is especially critical with regard to implementation of demand management in all identified key cities.*
- 4. TII recommends that National Planning Framework commentaries relating to commuting are reviewed. Issues such as addressing congestion, enabling the essential movement of goods and services throughout the country, and reducing the demand for travel should be considered as an integrated approach to sustainable mobility.*

2.3 Defining a Strategic Transport Network

Taking account of the sustainable mobility issues, TII would highlight the need to define and shape what is the character of the Irish Strategic Transport Network to deliver for the shape of our future communities and enterprises.

The Draft Framework recognises that investment needs to be maintained in national, regional and local roads and that strategic road improvement projects are required as key future Urban Growth Enablers outlined in the Draft Framework for Dublin, Cork, Galway, Limerick and Waterford as well as for Empowered Rural Communities.

National and regional roads accommodate 75% of traffic, the maintenance of these roads is important from a national policy perspective to support economic and community interaction across a range of sectors. To ensure that local investment priorities are aligned with national policy objectives, concrete mechanisms must be developed to ensure compliance with such overarching national policy objectives. In TII's opinion, the current document is unclear from this perspective of what and where these "networks" are. For example **Diagram 5.2** uses UK road classifications and the term 'major road' is not defined.

From TII's consideration and taking account of Action 5 of Investing in our Transport Future - Strategic Investment Framework for Land Transport, there is a need to identify roads of strategic importance to be prioritised for maintenance, renewal and investment related to the Irish transport system. This should be based on the National Planning Framework vision of the future rather than on existing travel patterns and traffic volumes.

Recommendation

The final National Planning Framework should address the need to

- i. Establish clearly elements of the Irish transport networks of strategic importance such as EU TEN-T network.*
- ii. Identify transport networks of strategic importance to be prioritised for maintenance, renewal and investment to deliver on in first instance National Strategic Outcomes and national policy objectives.*

2.4 Promote a Cross-Sectoral Approach

A major focus of the Draft Framework is on sustainability and clear individual sectoral objectives for its delivery are indicated, e.g. sustainable mobility, sustainable development of greenfield sites, competitive and environmentally sustainable economy, sustainable communities, sustainable energy, and sustainable management of water and other environmental resources. There is a risk that by individualising elements and/or prioritising their delivery, achieving the overarching principles of sustainability may be undermined.

From review of the document, the need to establish a hierarchy of these objectives and also acknowledge inter-complementariness became apparent. Currently the document has the following:

- 4 Higher Level Objectives,
- 69 National Policy Objectives and
- 10 National Strategic Outcomes

This format potentially pits objectives against each other rather than facilitating a strategic, co-ordinated, resilient and integrated response. The lack of a clear hierarchy is likely to prove problematic for infrastructure developers that are competing for government funding or attempting to progress schemes to give effect to the National Planning Framework.

TII would highlight that the national road network is a critical enabler in facilitating a country wide sustainable national transport system. At a more local level, the national road network transport enables interactions between all modes of travel.

TII notes that only some elements of the NTA Transport Strategy for the Greater Dublin Area, (2016 – 2035), principally public transport, are included in the Draft Framework. However other necessary and supporting objectives from the statutory Transport Strategy which are needed to mobilise and support the public transport proposals are excluded e.g. the implementation of Demand Management on the M50 (Figure 5.2) are omitted. Given the national significance of the M50, it is the opinion of TII that this Transport Strategy element should be addressed in the National Planning Framework. Such an action will help to encourage modal shift and assist in complementary objectives to promote urban consolidation. It is noted that improving traffic flow around Cork City is identified as an objective in the Draft Framework but a similar objective is not included for Dublin.

Similarly, there are a number of projects/schemes included in Regional City Growth Enablers, e.g. in Cork, improved Ringaskiddy Port Access that are not included in the National Strategic Outcomes. Given the need to promote urban consolidation in Cork City, this is a critical consideration. These elements form critical parts of the EU TEN-T core network to be addressed by 2030 and are also included in *Building on Recovery: Infrastructure and Capital Investment (2016 – 2021)*.

Recommendation

TII would welcome a review of the Draft Framework to ensure relevant growth enablers and enhancements to connectivity, be it between and within regions or to strategic ports and airports, are identified and included in the National Strategic Outcomes to account for the following:

1. *Sustainable Transport needs to be integrated and needs to be co-ordinated with the implementation of other critical policy objectives in the National Planning Framework.*
2. *It is recommended that a review of National Strategic Outcomes should be undertaken prior to adoption of the Framework to ensure identified growth enablers and critically important regional, inter-regional and international (Northern Ireland, Airport and Port) connections are reflected in the National Strategic Outcomes. A similar exercise to ensure consistency between National Policy Objectives and National Strategic Outcomes would also be beneficial to ensure consistency.*

3. It is recommended that a review of National Policy Objectives is undertaken prior to adoption of the Framework to ensure that key future growth enablers for the cities are integrated as objectives of the Framework.
4. Commitments need to be made for the key other transport related enablers of the NTA Transport Strategy for the Greater Dublin Area, (2016 – 2035) such as the implementation of Demand Management on the M50.

3. Enhanced Regional Accessibility

3.1 Regional Accessibility and Urban Consolidation Priorities.

TII welcome the key future growth enablers identified for the cities of Dublin Cork, Limerick, Waterford and Galway outlined in **Section 3** of the Draft Framework.

TII also note reference to enhanced regional accessibility in **Section 9.1** of the Draft Framework and the order of priority that appears to be established, which states that “once the core areas in key cities and urban areas have been mobilised, the next priority is to enhance accessibility between key urban centres of population and their regions such as the key cities of Cork and Limerick and through the Atlantic Economic Corridor to Galway..”. Similar text is also provided in the introductory text related to Enhanced Regional Accessibility outlined in the National Strategic Outcomes, page 133.

Similarly regional accessibility to the North West and connectivity to the North East all appear to be a secondary priority in the Draft Framework after urban areas have been mobilised. The latter term ‘mobilised’ is not determined. This would also appear to be in conflict with objectives indicated under **Section 2.3** to achieve regional growth targets.

TII agree that improved regional connectivity is essential to achieve the overall growth requirements for the cities and to reduce the reliance of the Country on the east seaboard. Journey times currently achieved between all regional cities including Dublin are shown in **Table 1** along with the distance between them.

Table 1: Travel Times and Average speeds achieved travelling only on national routes between cities in 2017

| | Dublin | | Cork | | Limerick | | Galway | | Waterford | |
|-----------|---------|----------|---------|----------|----------|----------|---------|----------|-----------|----------|
| Dublin | - | - | 2.3 hrs | 105 km/h | 1.8 hrs | 107 km/h | 2.1 hrs | 102 km/h | 1.4 hrs | 106 km/h |
| Cork | 2.3 hrs | 105 km/h | - | - | 1.5 hrs | 73 km/h | 2.7 hrs | 72 km/h | 1.7 hrs | 75 km/h |
| Limerick | 1.9 hrs | 107 km/h | 1.5 hrs | 73 km/h | - | - | 1.3 hrs | 79 km/h | 1.9 hrs | 67 km/h |
| Galway | 2.0 hrs | 102 km/h | 2.7 hrs | 79 km/h | 1.2 hrs | 80 km/h | - | - | 2.9 hrs | 79 km/h |
| Waterford | 1.5 hrs | 106 km/h | 1.6 hrs | 75 km/h | 1.9 hrs | 67 km/h | 2.9 hrs | 78 km/h | - | - |

At present relative journey times, based on distance travelled between the four regional cities are 25%-35% lower than those achieved between Dublin and the regional cities. In order to compete it is necessary to reduce the existing journey times on national routes by between 20% and 30%. TII advises that the use of target average speeds may have the unintended consequence of providing longer routes capable of achieving higher travel speeds without reducing the overall travel time between locations.

Also given these acknowledged imbalances, the themes of consolidation and enhanced regional accessibility can and should be seen as complementary. Major infrastructure projects have long lead in time for with respect to planning, design and obtaining statutory consent.

Having reviewed the Draft Framework, TII would suggest that the approach related explicitly to Cork within Section 3.9 “Enabling Growth in Ireland’s Cities” endorses the issues of priority and addresses the risk of conflict in interpreting objectives related to Enhanced Regional Accessibility i.e. ; ‘*It is also necessary to improve regional connectivity in tandem with urban growth strategies for Cork and the other regional cities...*’ **Section 3.9, page 54,**

TII would recommend that the following text is more applicable to all the key cities and should be included generally rather than for individual cities under **Section 3.5 Ireland’s Cities** as follows:

*It is also necessary to improve regional connectivity in tandem with urban growth strategies between the **Cities of Cork, Limerick, Waterford and Galway**. At present, average journey times between these cities are significantly slower travelled than from Dublin. An objective is to reduce the average journey times by road between these cities by 20% to 30% making them equivalent to the journey times from these cities and Dublin“*

Given the enabling requirement to this statement, TII recommends that **National Policy Objective 2c** should be amended as follows:

Existing

Accessibility to the north-west of Ireland and between centres of scale separate from Dublin will be improved, focused on cities and larger regionally distributed centres and on key east west and north-south routes.

Proposed

Accessibility to the north-west of Ireland and between centres of scale separate from Dublin will be improved, focused on the **Cities of Cork, Limerick Waterford and Galway** and larger regionally distributed centres and on key east-west and north-south routes.

Taking account of the above, other elements of the Draft Framework would also need to be reviewed. This would include reference to enhanced regional accessibility in Section 9.1 of the Draft Framework and the order of priority that appears to be established by the text. This would ensure unintended consequences for other objectives, such as provision of priority national road schemes or even inter-regional public transport schemes, are avoided.

TII advises from experience that issues can arise from legal interpretations of statutory texts. In our opinion, the current Draft Framework creates a potential to compromise the planned delivery of appropriate schemes especially through the statutory consent process. Such outcomes could result in significant expense to the Exchequer and reduce confidence in national and international economic investment opportunities and have associated implications for the initial mobilisation of core areas in key cities and urban areas.

TII therefore also recommends the following wording amendment under **Section 9.1:**

Existing Wording:

Enhanced Regional Accessibility: Once the core areas in key cities and urban areas have been mobilised, the next priority is to enhance accessibility between key urban centres of population and their regions such as the key cities of Cork and Limerick and through the Atlantic Economic Corridor to Galway as well as access to the larger urban centres in the North-West. Investment in connectivity first without urban consolidation measures will likely worsen the current trend towards sprawl.

Accessibility to the North-West

- Upgrade northern sections of the N4 route and sections of the N3/M3 national primary route.

Proposed Wording

Implementation of the National Planning Framework requires the need to protect our existing strategic transport networks and target enhanced accessibility between key urban centres of population and their regions such as the cities of Waterford, Cork and Limerick and through the Atlantic Economic Corridor to Galway as well as access to the larger urban centres in the North-West. To maintain the focus on urban consolidation, targeted investments in connectivity needs to be planned and operated in a complementary and supporting manner to avoid the current trends towards sprawl.

Under Accessibility to the North West

- *Upgrade northern sections of the N4 route and sections of the N3/M3 and N5 national primary routes.*

Implementation of the Draft Framework would benefit from breaking what can be perceived as a rigid connection to an order of priority as stated in **Section 9.1**. As the National Planning Framework will be implemented over a 20 year horizon, there is potential for a wide range of factors to cause a shift in focus or delivery of key objectives and the delivery, prioritisation and implementation programme. The finalised National Planning Framework should have the capacity to respond to external factors.

3.2 Inter-Urban Connectivity Targets

With reference to the Enhanced Regional Accessibility National Strategic Outcome concerning Inter-Urban Roads and the objective to improve average journey times targeting an average inter-urban speed of 90kph, page 133, TII would request clarification of this objective and an opportunity to discuss a framework for implementation.

It is not clear whether this objective relates to all inter-urban roads or just inter-urban national roads or only to roads linking the key regional cities and from what starting point i.e. inter-city from identified metropolitan areas. It is also not clear whether the term 'urban' relates to the Metropolitan Dublin Region and the 4 Key Regional Cities or as identified in the Draft Framework, a settlement with a population over 10,000 people.

The map provided in **Figure 1** details the location of all urban centres with a population in excess of 10,000 based on CSO 2016 census data.

TII therefore considers that this objective would benefit from clarification.

CSO Settlements (Population > 10,000)

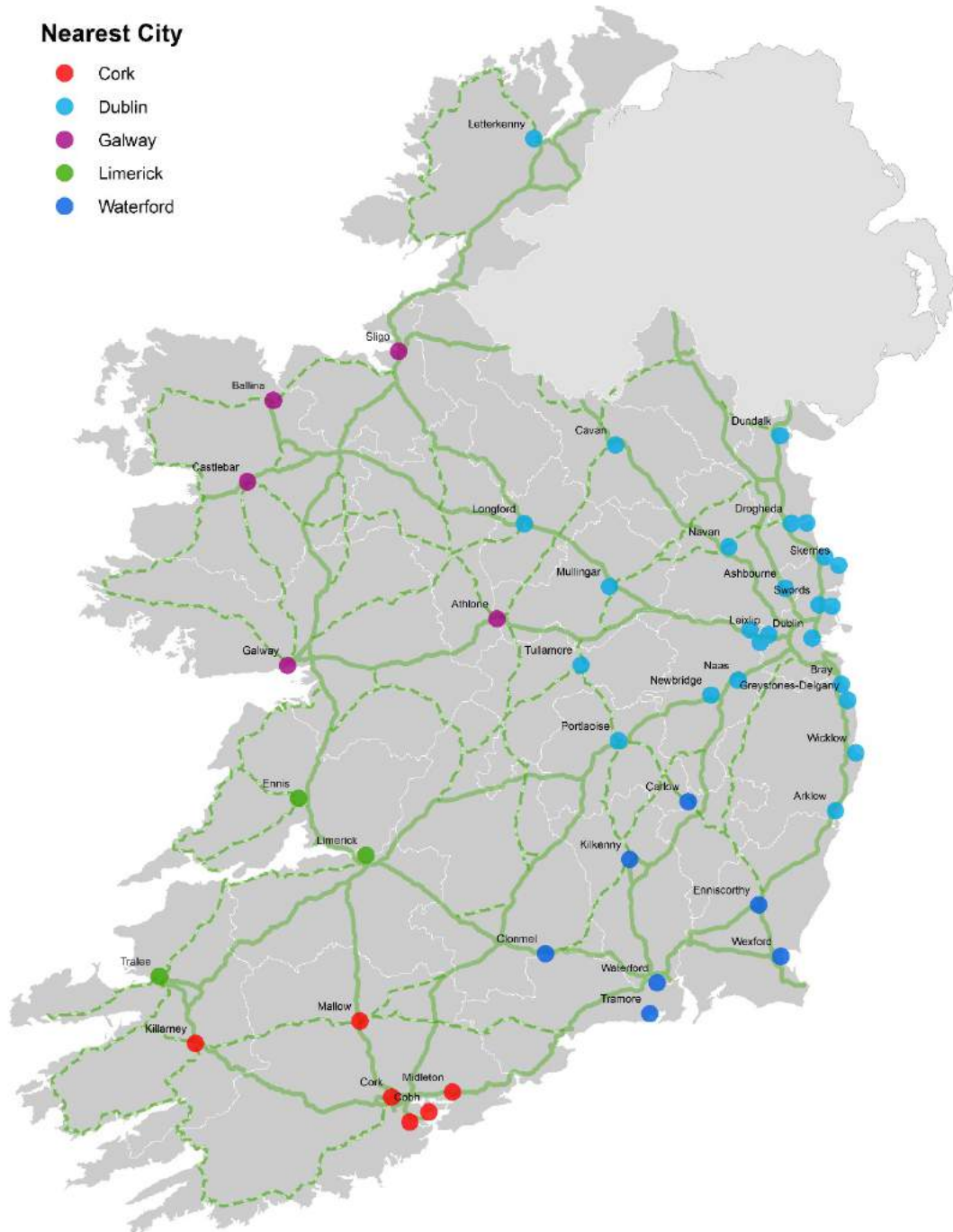


Figure 1: CSO Settlements (Population > 10,000)

Recommendation

TII advises that:

- i. The themes of consolidation and enhanced regional accessibility should be complementary.*
- ii. Revised Text is considered for inclusion under National Policy Objective 2C should be amended as follows:*

Accessibility to the north-west of Ireland and between centres of scale separate from Dublin will be improved, focused on the Cities of Cork, Limerick Waterford and Galway and larger regionally distributed centres and on key east-west and north-south routes.

- iii. Revised Text is considered for inclusion under section 3.5 to apply to all key cities as follows:*

It is also necessary to improve regional connectivity in tandem with urban growth strategies for between the Key Cities of Cork, Limerick, Waterford and Galway. At present, average journey times between these cities are significantly slower travelled between these centres than from Dublin. An objective is to reduce the average journey times by road between these cities by between 20% to 30% making them equivalent to the journey times from these cities and Dublin“

- iv. Revised Text is considered for inclusion in Section 9.1 National Strategic Outcomes; Enhanced Regional Accessibility:*

Implementation of the National Planning Framework requires the need to protect our existing strategic transport networks and target enhanced accessibility between key urban centres of population and their regions such as the cities of Waterford, Cork and Limerick and through the Atlantic Economic Corridor to Galway as well as access to the larger urban centres in the North-West. To maintain the focus on urban consolidation, targeted investments in connectivity needs to be planned and operated in a complementary and supporting manner to avoid the current trends towards sprawl.

Under Accessibility to the North West

- Upgrade northern sections of the N4 route and sections of the N3/M3 and N5 national primary routes*

- v. Implementation of the Draft Framework may benefit from breaking what might be perceived as a rigid order of priority.*
- vi. Clarification and consistency in the use of the phrase relating to the proposed National Strategic Outcome Enhanced Regional Accessibility - to improve average journey times targeting an average inter-urban speed of 90kph- is required to provide greater consistency in interpretation and confidence in implementation of the Framework.*

4. Clarification Matters

The following are general comments on the text which would need further attention:

- TII notes that National Policy Objective 70, page 146, proposes to subject all 'plans, projects and activities' to relevant environmental assessment requirements including SEA, EIA and AA as appropriate. TII requests that the introduction of the phrase 'activities' is clarified. This is in the interests of avoiding ambiguity, having regard to the fact the relevant EU Directives are primarily concerned with the assessment of plans, programmes and projects.

- Hierarchy of Settlements and Related Infrastructure, page 77, identifies, inter alia, accessibility 'Networks' relevant to settlement size. Networks referred to include 'major roads' which may reflect national primary roads given that most settlements with populations over 10,000 people are located on or adjoin the national primary road network however, clarification of this term may be beneficial for the implementation phase of the Framework. In addition, the phrase 'trunk roads' is not used for road classification purposes in the Republic of Ireland. Clarification of these road classification would benefit the Draft Framework and implementation to avoid future interpretation issues.
- National Policy Objective 68, page 129, includes the provision that infrastructure delivery agencies will focus on the timely delivery of enabling infrastructure to priority zoned lands in order to deliver planned growth and development. Related to points already made relating to Enhanced Regional Accessibility, clarity may need to be provided having regard to the long lead in time for strategic transport projects and the order of priority that appears to be established in the Draft Framework concerning the mobilisation of core areas in key cities and urban areas.

5. Future Engagement

A significant number of subordinate policies, strategies and implementation frameworks will follow the publication of the National Planning Framework. TII is available, as always, to assist and support policy preparation, co-ordination and implementation at all levels of the subsequent subordinate plans and frameworks.

TII considers it important that relevant stakeholders are clearly identified and included in technical working groups relevant to the different frameworks, for example;

- 10 year National Investment Plan (Roads and Public Transport);
- Regional Assembly Senior Officials Advisory and Technical Working Groups ;
- Metropolitan Area Strategic Plans;
- NTA Spatial Transport Plans for Cities.

TII will continue to make its resources available to support the preparation of Regional Spatial and Economic Strategies (RSES) and will support the implementation and monitoring group for the adopted National Planning Framework.

In addition to TII's transport role and experience in the statutory planning process, TII has the capacity to provide very significant capabilities and resources in national transport planning. The Department will be aware from assistance already provided in the preparation of the Draft Framework that TII has developed a multi-modal interurban model of the national transport network (National Transport Model-NTpM) incorporating rail, bus and freight models in addition to the road network model. This produces detailed, medium to long range transport projections of covering all land based travel modes. The NTpM allows TII to understand the current and future needs across the national road network and the potential impact of any interventions in transport network or changes to demographics. This is a very powerful tool available for the preparation of regional and national plans.

Recommendation

TII as both an implementer of policy and as statutory consultee is available to assist and support policy preparation, co-ordination and implementation at all levels of the subsequent subordinate plans and frameworks.

6. Conclusion

A safe and efficient national road network and light rail service are crucial elements of Ireland's sustainable transport system and are vital for accessibility, continued economic growth and facilitating sustainable mobility. The current absence of a framework for long term planning has impacted on the delivery of major infrastructural schemes. TII recognises that the National Planning Framework will address this uncertainty and therefore supports its publication with the suggested amendments.

The aim of this report is to assist the National Planning Framework Project Team in finalising the National Planning Framework. It is therefore requested that the foregoing observations are taken into consideration. TII remains available to discuss this submission and to assist the Department with technical input, in finalising the National Planning Framework and its implementation where applicable. TII will also provide input to the identified subordinate plans and strategies which follow.

For convenience, a table providing a summary of TII's recommendations is appended.

APPENDIX : SUMMARY of RECOMMENDATIONS

| THEME | RECOMMENDATION |
|---|--|
| Challenges for the Delivery of Transport Infrastructure and Services | <p>The final National Planning Framework should acknowledge following:</p> <ol style="list-style-type: none"> 1. Existing Government commitment to projects included in Building on Recovery and which will be included in the finalised National Investment Plan (2018-2027). 2. The national road network (or identified strategic road networks) as a critical enabler in facilitating the sustainable national transport system, both in terms of efficient use of, and investment in, the existing network and proposals for new connectivity and links. 3. The importance of the national road network in providing regional connectivity, addressing peripherality, empowering rural communities and facilitating access to critical services such as education, healthcare, employment and enterprise. 4. In an urban context, managing congestion around cities, and the contribution such measures can make in reducing car based commuting and incentivising alternative modes of travel could also be more explicitly included in the Framework. This is especially critical with regard to implementation of demand management in <u>all</u> identified key cities. 5. TII recommends that National Planning Framework commentaries relating to commuting are reviewed. Issues such as addressing congestion, enabling the essential movement of goods and services throughout the country, and reducing the demand for travel should be considered as an integrated approach to sustainable mobility. 6. The Final National Planning Framework should address the need to <ol style="list-style-type: none"> i. Establish clearly elements of the Irish transport networks of strategic importance such as EU TEN-T network. ii. Identify transport networks of strategic importance to be prioritised for maintenance, renewal and investment related to deliver on in first instance National Strategic Outcomes and national policy objectives. This can be undertaken by DTTAS in conjunction with Local Authorities, TII and the NTA. 7. Sustainable Transport needs to be integrated and needs to be co-ordinated with the implementation of other critical policy objectives 8. It is recommended that a review of National Strategic Outcomes should be undertaken prior to adoption of the Framework to ensure identified growth enablers and critically important regional, inter-regional and international (Northern Ireland, Airport and Port) connections are reflected in the National Strategic Outcomes. A similar exercise to ensure consistency between National Policy Objectives and National Strategic Outcomes would also be beneficial to ensure consistency. 9. It is recommended that a review of National Policy Objectives is undertaken prior to adoption of the Framework to ensure that key future growth enablers for the cities are integrated as objectives of the Framework. 10. Commitments need to be made for the key non-public transport related enablers of the NTA Transport Strategy for the Greater Dublin Area, 2016 – 2035) such as Demand Management on the M50 which are required to mobilise modal shift |

| THEME | RECOMMENDATION |
|---|--|
| <p>Recognising Enhanced Regional Accessibility</p> | <p>TII advises that</p> <ol style="list-style-type: none"> 1. The themes of consolidation and enhanced regional accessibility should be complementary. 2. Revised Text is considered for inclusion under National Policy Objective 2C should be amended as follows: <p style="margin-left: 40px;"><i>Accessibility to the north-west of Ireland and between centres of scale separate from Dublin will be improved, focused on the Cities of Cork, Limerick Waterford and Galway and larger regionally distributed centres and on key east-west and north-south routes.</i></p> 3. Revised Text is considered for inclusion under section 3.5 to apply to all cities as follows: <p style="margin-left: 40px;"><i>It is also necessary to improve regional connectivity in tandem with urban growth strategies for between the Cities of Cork, Limerick, Waterford and Galway At present, average journey times between these cities are significantly slower travelled between these centres than from Dublin. An objective is to reduce the average journey times by road between these cities by 20% to 30%, making them equivalent to the journey times from these cities and Dublin.</i></p> 4. Revised Text is considered for inclusion in Section 9.1 National Strategic Outcomes; Enhanced Regional Accessibility; <p style="margin-left: 40px;"><i>Implementation of the National Planning Framework requires the need to protect our existing strategic transport networks and target enhanced accessibility between key urban centres of population and their regions such as the cities of Waterford, Cork and Limerick and through the Atlantic Economic Corridor to Galway as well as access to the larger urban centres in the North-West. To maintain the focus on urban consolidation, targeted investments in connectivity needs to be planned and operated in a complementary and supporting manner to avoid the current trends towards sprawl.</i></p> <p style="margin-left: 40px;">Under Accessibility to the North West</p> <ul style="list-style-type: none"> • <i>Upgrade northern sections of the N4 route and sections of the N3/M3 and N5 national primary routes</i> 5. Implementation of the Draft Framework may benefit from breaking what might be perceived as a rigid order of priority. 6. Clarification and consistency in the use of the phrase relating to the proposed National Strategic Outcome Enhanced Regional Accessibility - to improve average journey times targeting an average inter-urban speed of 90kph- is required to provide greater consistency in interpretation and confidence in implementation of the Framework. |

| THEME | RECOMMENDATION |
|--|---|
| <p>Clarification Matters within Text.</p> | <ol style="list-style-type: none"> 1. National Policy Objective 70, page 146, proposes to subject all ‘plans, projects and activities’ to relevant environmental assessment requirements including SEA, EIA and AA as appropriate. TII requests that the introduction of the phrase ‘activities’ is clarified, in the interests of avoiding ambiguity, having regard to the fact the relevant EU Directives are primarily concerned with the assessment of plans, programmes and projects. 2. Hierarchy of Settlements and Related Infrastructure, page 77, identifies, inter alia, accessibility ‘Networks’ relevant to settlement size. Amendment will need to take account of terminology for the Irish road classification system to avoid future interpretation issues. 3. National Policy Objective 68, page 129, includes the provision that Infrastructure delivery agencies will focus on the timely delivery of enabling infrastructure to priority zoned lands in order to deliver planned growth and development. Clarity may need to be provided having regard to the long lead in time for strategic transport projects and the order of priority that appears to be established in the Draft Framework concerning the mobilisation of core areas in key cities and urban areas. |
| <p>Need for Active Future Engagement</p> | <p>TII as both an implementer of policy and as statutory consultee is available to assist and support policy preparation, co-ordination and implementation at all levels of the subsequent subordinate plans and frameworks.</p> |