

Ireland 2040 Our Plan: Public Consultation Document

Department of Transport, Tourism and Sport Comments

1. General Comments

The Department of Transport, Tourism and Sport welcomes the comprehensive draft National Planning Framework published for public consultation and the close engagement between this Department and the Department of Housing, Planning and Local Government on the development of the draft NPF. We recognise that many of our comments on previous drafts of the NPF were taken on board in the published draft document. The Department has some further comments across our three sectors which are set out below, particularly in the context of the finalisation of the forthcoming National Investment Plan with suggested new or re-worded text provided. We are available to meet bilaterally to discuss these comments in advance of the Cross Departmental Steering Group meeting on 24 November.

Page 113 **9.3 Ireland 2040 and the National Investment Plan**

It is important that the NPF ensures that the land-use planning system protects the considerable public investment made to date in Ireland's existing extensive transport network, particularly in relation to the strategic road network and the public transport network. One of the key priorities identified in the Department of Transport, Tourism and Sport's Strategic Investment Framework for Land Transport (SIFLT)¹ which was published in 2015, was the need to protect the existing land transport asset base. Prioritisation of this category of investment is also a key finding of the recent Public Investment Management Assessment (PIMA) analysis conducted by the International Monetary Fund². While the draft NPF refers to the need to maintain existing public infrastructure under the reference to the National Investment Plan which will *"invest to maintain the quality and performance of existing public infrastructure"*, the Department considers that the importance of protecting the existing asset base should be strengthened in the NPF as follows:

The National Investment Plan 2018-2027

Insert after *"Building on Recovery, the current Capital Plan, already includes actions to support the social and economic progress of rural and urban communities in all regions. The National Investment Plan builds on the review of the existing Capital Plan reflecting sectoral gaps identified by analysis and research³⁴."*

"Furthermore, public investment plays a role in protecting asset quality and value. Given the identified high level of previous investment in the sector, maintenance and renewal is an important consideration."

¹ Department of Transport, Tourism & Sport (2015) "Investing in Our Transport Future: Strategic Investment Framework for Land Transport"

² International Monetary Fund (September 2017) "Ireland Public Investment Management Assessment, Technical Assistance Report"

Change in Table “4. Building on existing assets and capacity to create critical mass and scale as growth drivers;” to

“4. Protect and build on existing assets and capacity to create critical mass and scale as growth drivers;

2. Specific Comments

Public Transport (Table of Key future growth enablers for Dublin page 39)

The Department’s earlier submissions on previous drafts of the NPF referred to the continued reference to potential future electrification of the national rail network. As previously advised, full electrification of the entire national rail network would have significant costs and is not a transport policy or investment priority over the term of this framework or strategy. The National Transport Authority’s *Transport Strategy for the Greater Dublin Area 2016-2035*³ very clearly identifies a number of priority projects in the area of rail electrification and these are presented, as a group and on an integrated basis in the DART Expansion Programme. In relation to access to Dublin Airport, in particular, the Strategy identifies the new Metro North project as the optimum long term public transport solution on the Swords/airport/city centre corridor this is planned and budgeted for delivery over the next decade.

Change the 6th bullet point in the table as follows:

- “Delivering the key rail projects set out in the Transport Strategy for the Greater Dublin Area including Metro North, DART expansion and the Luas green line link to Metro North; to
- “Delivering the key rail projects set out in the Transport Strategy for the Greater Dublin Area including Metro North, the DART Expansion Programme, upgrading of the Luas Green line to link to Metro North and further develop the Light Rail network ;

Change the 13th bullet point in the table as follows:

- “Improving access to Dublin Airport, to include improved public transport access, connections from the road network from the west and north and in the longer term, consideration of heavy rail access to facilitate direct services from the national rail network in the context of potential future electrification;” to
- “Improving access to Dublin Airport, to include improved public transport access, connections from the road network from the west and north and via a new Metro North that will provide a high-speed, high-capacity, high-frequency public transport link from Swords through Dublin Airport and on to the city centre”

³ National Transport Authority’s *Transport Strategy for the Greater Dublin Area (GDA) 2016-2035*

Tourism (Chapter 4 – Planning for Diverse Rural Places)

The following is a proposed rewording of the tourism paragraph in Chapter 4:

“Tourism is a hugely important indigenous economic sector and a significant source of employment in rural areas. It has the capacity to directly and indirectly sustain communities, create employment and deliver real social benefits for rural Ireland. A large part of Ireland’s attraction comes from our beautiful landscapes and scenery together with our built heritage. Maintaining and protecting these assets is critical to Ireland’s future success as a tourism destination. Developing new attractions which complement existing offerings and are sustainable from an environmental and social perspective will also be central to developing the sector. “

The following is a proposed new National Policy Objective 21A (replacing the tourism element in the existing Objective 21):

“Recognise the importance of tourism in the rural economy, both by ensuring development is carried out with as much sympathy as possible for both the natural landscape and built heritage and also by facilitating growth in tourism which is economically, socially and environmentally sustainable.”

Greenways

The following edits are proposed for page 73:

“Such a network would allow for greater access to more ~~rural remote~~ rural parts of the country and presents opportunities for associated tourism development to take place in rural areas.”

National Policy Objective 23

“Facilitate the development of a National Greenways/Blueways Strategy which prioritises projects on the basis of achieving maximum impact ~~and connectivity~~ at national and regional level.”

As outlined in previous submissions, the current policy on Greenways is for clusters of greenways rather than a fully connected network of greenways. The nature of greenways as a tourism/leisure amenity – rather than travel/transport infrastructure – means that connectivity is not an essential attribute.

In Chapter 7 (page 105) whilst not fully Greenway related, the following edits are proposed:

from:

“There are currently no dedicated long-distance cycling/walking routes which link Northern Ireland and Ireland, though INTERREG V EU funding is assisting in their development. There is the potential for existing way-marked trails within border areas in Ireland, to link into existing established trails within Northern Ireland.

to

“Long-distance cycling and walking routes which link Northern Ireland to Ireland need more development, both the International Appalachian Trail and Eurovelo 1 that need support and route

development together with INTERREG V funded Greenways in development in Monaghan and Louth that link with Armagh and Down. There is the potential for further way-marked trails within border areas in Ireland, to link into existing established trails within Northern Ireland.”

Ports (Chapter 6 page 94)

The following edits are suggested:

“National Ports Policy requires Tier 1 and Tier 2 ports, ~~or ports of national and regional significance,~~ to lead the response in meeting Ireland’s future port capacity requirements.”

“National Ports Policy also recognises the Tier 2 ports of ~~Belview~~ Waterford and Rosslare Europort because of the potential to grow traffic through these ports, their proximity to key trading partners and their strategic transport roles beyond their immediate environs.”

National Ports Policy, approved by Government, published in March 2013, provides a framework for the provision of port services, which are efficient, effective and adequate to meet the needs of Ireland’s trading economy. The policy recommends governance structures appropriate to each port’s particular circumstances, role and function.

National Ports Policy (NPP) categorises the State commercial ports sector into –

- Ports of National Significance Tier 1 (*Dublin, Cork and Shannon Foynes*)
- Ports of National Significance Tier 2 (*Rosslare and Waterford*)
- Ports of Regional Significance (*Drogheda, Dún Laoghaire, Galway, New Ross and Wicklow*).

National Ports Policy requires Tier 1 and Tier 2 ports of national significance, to lead the response in meeting Ireland’s future port capacity requirements.

National Ports Policy recommends that the designated Ports of Regional Significance are transferred to more appropriate local authority-led governance structures and this process is underway with two ports already transferred to a local authority. The five Ports of Regional Significance are more important regionally rather than nationally and have important roles as facilitators of their regional economies and for local marine-related amenity and tourism activities.

Sport

The Department welcomes the inclusion of four National Policy Objectives that deal with sport and physical activity, namely numbers 23, 26, 28 and 29. Although this is a legitimate acknowledgement of the importance of sport and physical activity in the lives of the Irish population, whether as active or social participants, it is considered that there is a pressing need to strengthen the National Planning Framework in the following four areas.

1. There is no reference to the importance of the built environment as a key influencer in the promotion of sport and physical activity in any of the eight values underpinning the Framework’s Vision. It is suggested that this omission can best be addressed under the

“Quality” value on page 20 and, ideally, under point 3 of the graphics on page 27 (analogous to the treatment of artistic endeavour under point 4 of the same page).

2. Sport and its health and social benefits play an important part in improving people’s quality of life. Accordingly, it is considered that **sport** should be included in the Quality of Life infographic on page 74 (Fig. 5.1), perhaps as part of the Leisure and Social Interactions segment.
3. The inclusion of a specific section (5.5 on page 83) addressing the needs of children and young people is highly relevant just as it is in the case of the National Physical Activity Plan (NPAP) launched in early 2016. It is noted however that there is no specific policy objective set around ensuring that the natural and built environment is conducive to facilitating participation in sport and physical activity among children and young people. It is considered that such a specific policy objective needs to be set in order to demonstrate an integrated policy approach between the NPAP and the NPF.
4. It is also noted that section 5.6 on page 84, which deals with education, does not contain any reference to the need for having quality facilities within schools to underpin the delivery of quality physical education which might imbue children and young people with the necessary skills and physical literacy to enable them to be active citizens over the rest of their lives.

Department of Transport, Tourism and Sport
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