

Dear Sir/Madam,

My name is Roy Harford and I'm a Planning, Geography & Environment student in UCD. I wish to make the following submission to the public consultation for the National Planning Framework. This submission specifically relates to motorway influenced development, and how this leads to unsustainable car-dependent travel patterns.

Recent Development Patterns

The Issues and Choices paper (paragraph 2.2.1) identifies a number of worrying key trends of recent development in Ireland:

- *Settlement, i.e. where people live, has generally become more spread out, and employment, i.e. where people work, has generally become more concentrated into a smaller number of areas;*
- *Whilst population growth has been focused on larger urban centres, it has mainly occurred in the surrounding 'hinterlands'. This means at the edge of the settlement or in the surrounding towns and rural areas;*
- *Employment growth has been most prominent in larger centres, but has mainly occurred at the settlement edge or closer to central areas;*
- *Decline has generally occurred in less accessible rural areas; smaller towns outside the hinterlands of the cities or larger towns; and in some of the more established, inner urban parts of cities and large towns;*
- *There has been an increasing concentration of population and economic activity in the East of the Country, with much of the growth associated with Dublin being accommodated in ten other counties, extending from Cavan to Wexford.*

But why have these patterns of development occurred? Paragraph 2.2.7 gives what is probably the number one reason:

It is clear that the development of the national motorway network over the past twenty years has influenced the settlement pattern, particularly in Leinster, on which it is primarily focused. There is an emerging concentration of population and economic activity along the M1 Dublin-Dundalk and M7/M9 Dublin-Portlaoise/Carlow corridors, reflecting a concentration of larger towns and their hinterlands.

The development of the national motorway network has made it easier, faster and cheaper for people to commute long distances, and has ultimately made settlements further away from cities

more attractive and affordable for people to live in. Developers are encouraged to develop in these locations where land prices are lower, while local authorities often want to use the motorway to their advantage as a way to encourage economic growth within their areas. In Dublin, towns in surrounding counties have experienced high population growth and have effectively become commuter towns for Dublin. According to Minister Simon Coveney during an NPF consultation event in UCD, there are now 10,000 people commuting from Port Laoise to Dublin on a daily basis.

Employment growth is occurring at the edges of settlements, with one the reasons being that these areas are easier to access from motorways. In Naas, the relatively new Kerry Group offices, which accommodate close to 1,000 employees, are located at a significant distance from residential areas or any public transport, and are largely car dependant. In Dublin, employment has been focused into areas along the M50, such as Sandyford or Ballycoolin, or along radial routes such as City West on the N7. While many people might assume that the Luas was a big factor in the development of the Sandyford area, this is not the case. A survey carried out in 2011 as part of the Sandyford Business District Mobility Management Plan found that cars accounted for 63% of mode share, while Luas accounted for only 12%.

It is obvious that the development of the national motorway network has had a significant influence on the location of development over the past number of years. If we allow the existing trends to continue into the future, it will result in further residential and commercial development adjacent to motorway junctions, and will give rise to more car based travel, and threaten the viability of public transport services.

The Approach to Date – Planning Restrictions

The approach to date has focused on using planning restrictions to try and prevent car-dependant travel patterns, such as through land zoning and restrictions on rural housing. As can be seen from the recent settlement patterns listed in the Issues and Choices paper, this approach has not been very successful. One problem with this approach is that it doesn't differentiate between people working locally and those commuting to another urban centre. Putting in place restrictions on development is unfair to the people working in the locality, as it can result in increased housing and rental costs for them.

However, the key issue with using this approach is that it doesn't solve the underlying problem, which is the demand for development generated by the motorway. Easy motorway access will always be considered a benefit, and where motorways exist, demand induced by the motorway will always exist. And where demand exists, there will always be pressure on the planning system to relax restrictions and satisfy that demand.

A Better Approach – Demand Management

The only way to significantly reduce motorway influenced development is to reduce the overall demand which exists for development along them. As it appears to be the construction of motorways which is creating this demand, then in theory the ideal solution is to stop building motorways, and get rid of the motorways that we have, but obviously that is a stupid idea, as there are many other important benefits of motorways.

The reason that we build motorways is to improve accessibility, and reduce journey times and travel costs between locations. Motorways are not intentionally built to encourage long-distance car-based commuting, so this type of travel should be discouraged.

An easy way to discourage people from using a motorway on a daily basis is through the use of a toll. While any toll imposed should obviously not be excessive, it should be sufficient to discourage regular use. In many European countries, such as France, Italy, Spain and Portugal, motorways are considered a luxury and tolls exist across nearly the entire motorway network. Ireland should take note of the systems used in other countries and these could relate to Ireland.

During the lifetime of the National Planning Framework, it is expected that a number of new motorway schemes will be completed, the most significant being the M20 Cork to Limerick motorway. If the same policies are followed as in previous motorway developments, then the opening of this motorway is going to significantly increase the attractiveness of locations along the route and increase the pressure for car oriented development in these areas.

The option of some tolling should be seriously considered as part of this development. All decisions relating to tolls have been political to date, but should they be political?

If An Bord Pleanála are of the opinion that the construction of a new motorway will lead to unsustainable car dependent development and unsustainable travel patterns, should they have the option of being able to attach a condition to a grant of permission, requiring the implementation of appropriate tolls to mitigate these impacts?

An Bord Pleanála correctly predicted that the upgrade of the M50 motorway would lead to induced traffic along the route, and therefore included a condition that a demand management study would be carried out. But while this study was completed, its recommendations have not been implemented for political reasons.

Tolls should also be considered on existing motorways, as the revenue raised from them could be used to enhance public transport services, the benefits of which would probably outweigh the cost of the toll itself. Taking the Naas Road as an example, due to the large volume of traffic, imposing a relatively small toll would generate significant revenue which could be invested into significantly enhanced public transport services, and the creation of faster, frequent and new routes to areas previously not served.

Conclusion

In conclusion, I request that the following two points are seriously considered for inclusion in the NPF:

- 1. As a general policy, all new motorway developments should be appropriately tolled, so as to mitigate against the demand for motorway induced development, and to prevent where possible the generation of unsustainable settlement and travel patterns. Part of the proceeds received from tolls should be used to improve public transport services and infrastructure for walking and cycling, so that communities along the route can still benefit from the presence of the motorway. People should not be prevented from living in any hinterland town, but if they intend to commute to another urban centre, then they should be forced to consider how they are going to make that journey, and what the costs of that journey will be.**
- 2. The possibility of introducing tolls on existing motorways should be considered, with the proceeds of any tolls being used towards enhancing local public transport services. In many cases it is likely that this would be in the best interests of the public, as the improvement in public transport services which could be funded from tolls would likely outweigh the costs of the tolls.**

Kind Regards,

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