

National Planning Framework Revision

National, Regional and Urban Planning

Department of Housing, Local Government and Heritage

Custom House

Dublin D01 W6X0

12 September 2024

RE: First Revision to the National Planning Framework (NPF)

To the Department of Housing, Local Government and Heritage,

Transport Infrastructure Ireland (TII) welcomes the opportunity to contribute to this first revision of the National Planning Framework. TII is responsible for securing a safe and efficient National Road and light rail network. TII provides funding to Local Authorities and supports them in the planning, design, construction, maintenance and operation of the National Road Network, Greenways and the National Cycle Network.

TII outlines the following recommendations for consideration within this NPF revision. The text included in **blue** is wording that TII would like to be included in the new document.

TII recommendations regarding the NPF Revision:

a) Status of the National Strategic Outcomes (NSOs)

At the core of the National Planning Framework and national transport investment priorities, it is recognised that there is a need to facilitate regional rebalancing to ensure investment supports population and employment growth; while also facilitating the safe and efficient movement of people, goods and services within and between communities throughout Ireland and to strategic ports and airports.

Since the publication of the NPF, Department of Transport's National Investment Framework for Transport in Ireland (NIFTI) was published in 2021. National Roads 2040 (NR2040) is TII's strategy for the National Roads network out to 2040;¹ which interprets the current National Planning Framework (in particular the NSOs), and the transport investment priorities set out in NIFTI, in order to realise the several National Strategic Outcomes, set out in the NPF.

However, TII's experience indicates that the ten NPF 'National Strategic Outcomes' are not being interpreted and applied as 'policy' and/or 'objectives'. Instead, planning authorities and the Office of the Planning Regulator give the weight of policy to the implementation of National Policy Objectives, due to Section 12(18) and Section 20(5) of the Planning and Development Act, 2000, as amended.

¹ <https://www.tii.ie/media/zvypdolo/tii-nr2040-final-report-en-april-2023.pdf>

These sections indicate that a Local Authority has statutory obligations to ensure that the development and local area plans are consistent with the national policy objectives specified in the National Planning Framework, but not necessarily the NSOs.

TII would suggest that greater clarity around the status of the ten National Strategic Outcomes could be provided by the inclusion of a clear statement in the revised National Planning Framework which indicates that the NSOs represent key overarching strategic national policy objectives. TII considers that this could be achieved by the addition of the following text in **blue** in a revised Section 1.1 and an additional National Policy Objective 103 as follows:

“1.1 Setting out the Vision

*“Too often in the past our policies and actions have sought to elevate one idea over another; they have even in some instances pitted one area against the other. Our ambition is to create a single vision, a shared set of goals for every community across the country. These goals are expressed in this Framework as National Strategic Outcomes (NSOs). They are our shared successes **which represent overarching strategic national policy objectives** which we believe this plan will deliver.”*

The above could be underpinned further by the following amendment to National Policy Objective 103:

“Proposed National Policy Objective 103: Continue to ensure the alignment of the National Planning Framework and the National Development Plan through delivery of the National Strategic Outcomes **which represent strategic national policy objectives.**”

b) Additional Transport Related National Policy Objectives

The state has made considerable investment in the National Road network (motorways, National Primary and Secondary roads) in recent decades. The asset value of this network is greater than €32billion. Given observed and anticipated future population growth (and related transport demands), TII considers it imperative that these networks are protected to perform their strategic functions such as the movement of freight, commerce, accommodating public transport and enabling inter-regional and inter-urban travel.

TII would highlight that no NPF National Policy Objective currently address regional connectivity and transport. Therefore, it is TII’s opinion that there is an unintended disconnect relating to the implementation of National Strategic Outcomes NSO 2, NSO 4 and NSO 5; but arguably equally NSO 1, NSO 3, NSO 6, NSO 8 and NSO 10. The delivery of these NSOs relies on a safe, reliable, resilient, and efficient transport system, which includes the National Roads network.

Accordingly, TII respectfully recommends that consideration should be given to including the following proposed National Policy Objectives in the Revised National Planning Framework:

Proposed NPO: Transport Networks and Connectivity – (Linking to NSO 2 -Enhanced Regional Accessibility)

The function and safety of national transport systems will be maintained, safeguarded and improved to enhance accessibility, promote balanced regional development and provide connectivity between metropolitan areas, key urban centres, communities, major ports, airports and markets thereby giving effect to the National Strategic Outcomes.

Proposed NPO: The National Roads Network (Linking to NSO 2- Enhanced Regional Accessibility)

Ireland's National Roads network will be maintained to a resilient and safe standard to secure the provision of a safe and efficient network to enable inter-regional and international connectivity and facilitate the movement of freight, services and people, including public transport services.

Proposed NPO: Integrated Mobility / Inter-modality (Linking to NSO 4 Sustainable Mobility and or NSO 8 Transition to a Low Carbon and Climate resilient society)

Integrated Mobility is key to supporting sustainable mobility and a transition to a low carbon society by facilitating an inclusive, well connected and integrated, inter-modal and sustainable transport system.

c) NSO2 - The importance of Regional Accessibility

TII strongly supports the stated objective of improving regional connectivity. The National Roads network currently plays a key role in the provision of regional accessibility; Furthermore, the effective and safe movement of freight in the State is primarily accommodated by road, in particular the motorway and National Primary Road networks. Therefore, regional accessibility improvements can support safer and more efficient movement of people, goods and services.

The NPF includes the objective of improving average journey times targeting an average inter-urban speed of 90kph. In addition, Page 43 of the draft NPF under the heading *Cork City and Metropolitan Area* outlines a target for average journey speeds between Cork and the cities of Waterford, Limerick, and Galway.

TII considers that the targets for average inter-urban and inter-city speeds on the national network are not appropriate as they could present a barrier to the sustainable planning and development of national road projects.

In the identification and development of national road improvements, TII follows the methodology outlined in DoT's NIFTI, in particular its intervention and modal hierarchies. TII considers that average journey time targets would not align with this methodology. Therefore, TII would recommend removal of average inter-urban and inter-city journey time targets for national roads.

d) NSO6 - The importance of the M50 and M1 for High Quality International Accessibility

The M50 corridor is the most heavily trafficked road corridors in the State² and is a key corridor for movement of people, goods and services. The sections of the M50 between the N7 and M1 interchanges and Dublin Port tunnel, forms part of the TEN-T core network. It provides connections between Dublin Port, Dublin Airport and the major cities, thus providing international accessibility for the country.

Currently there is a lack of orbital transport alternatives the M50 corridor between the N7 and M1 interchanges. For the purposes of achieving NSO6, TII proposes the provision of alternative orbital transport infrastructure / services to take pressure off the M50 and to protect the finite transport capacity of the M50 between the N7 and the M1. This would help safeguard the role of the M50 and M1 and in supporting regional and international accessibility.

² TII National Roads Network Indicators Report 2023, page 17. (<https://www.tii.ie/media/nhqna3rn/tii-national-roads-network-indicators-2023.pdf>)

TII respectfully recommends consideration of the same within the 'key future growth enablers for Dublin' section of the NPF revision.

e) New infrastructural considerations

Emphasis is placed on the facilitation of Offshore Renewable Energy, port enhancements, national grid improvements and electric vehicle charging delivery within the revised NPF document. Further detail may be necessary setting out how the various State agencies and stakeholders could align to ensure delivery of new infrastructure in these areas.

f) NPF Implementation

Critical to the success of the NPF and National Development Plan (NDP) is a more efficient delivery of the infrastructure that is required to ensure the success of the framework. Every effort should be made in this Framework and in the NDP itself; to assist in more efficient delivery of critical infrastructure including National Roads and light rail proposals. This should be set out and referenced within Chapter 10 "Implementing the NPF".

The importance of stakeholder cooperation in providing fast and efficient delivery cannot be understated. The focused and active engagement of all agencies and state bodies involved is a crucial element of a successful plan; and this engaged and co-operative approach needs much greater emphasis within the NPF.

Furthermore, the importance of multi-annual funding for critical infrastructure projects should also be emphasised.

Conclusion

TII would appreciate the incorporation of the recommendations set out above, within the revised NPF; and looks forward to close collaboration in the implementation of the same. Should the Department have any questions on this submission, please do not hesitate to contact the undersigned.

Yours sincerely,



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