

Draft Regional Spatial and Economic Strategy for the Southern Region: Public Consultation Document

Department of Transport, Tourism and Sport Comments

1. General Comments

The Department of Transport, Tourism and Sport welcomes the comprehensive draft Regional Spatial and Economic Strategy for the Southern Region and the close engagement between the Department and its agencies (National Transport Authority, Transport Infrastructure Ireland) with the Regional Assembly on the development of the draft RSES. We understand that both the NTA and TII will be making individual submissions with comments on the draft RSES.

The Department recognises that many of our comments on previous drafts of the RSES have been taken on board in the published draft document. The Department has some further comments across our three sectors which are set out below. We are available to meet bilaterally to discuss these comments in advance of finalisation of the RSES.

The draft RSES is closely aligned with Project Ireland 2040 (National Planning Framework and National Development Plan) and sits well with this Department's forthcoming plan – Planning Land Use and Transport Outlook (PLUTO) 2040. PLUTO 2040 will take the objectives of Project Ireland 2040 (as set out in the NPF and NDP) and the priorities set out in this Department's 2015 Strategic Investment Framework for Land Transport, and develop high-level objectives for investment in Ireland's roads and public transport infrastructure on the basis of them. One of the key challenges PLUTO 2040 will set out to address is the fact Ireland's transport system faces a number of competing, and in some cases, opposing objectives (such as expanding our transport infrastructure while ensuring Ireland achieves compact growth). The purpose of PLUTO 2040 is to develop a framework for Ireland's land transport policy and investment which provides an appropriate balance between its objectives.

The appropriate phasing of development is mentioned a number of times in relation to water and wastewater. Phasing is also an important consideration for transport, with the pursuit of one transport objective having the potential to undermine another if not sequenced correctly, and this could be more prominent within the RSES.

In relation to Regional Policy Objective 9 on page 40, that "all key towns will be subject to a Local Transport Plan", this is being considered as a specific recommendation in PLUTO 2040. It should be noted, however, that PLUTO 2040 will also develop a hierarchy of national transport objectives for consideration in the context of available Exchequer funding.

All new transport projects must be appraised in accordance with the Public Spending Code and the Common Appraisal Framework for Transport Projects and Programmes before they can be approved, whether or not they are included in the National Development Plan. Where the RSES lists aspirations beyond the National Development Plan it should be noted that the scope for such developments between now and 2027 will be constrained.

2. Public and Sustainable Transport

The Department welcomes the draft RSES' acknowledgment of the importance of public transport in developing sustainable cities and towns. We also welcome the focus on walking and cycling as a facilitator of compact growth at every level, from the cities and regional centres to smaller settlements through the Local Transport Plans. It is also important that the draft RSES recognises the role of the forthcoming Cork Transport Strategy and the planned Limerick and Waterford Transport Strategies for the integration of transport and spatial planning in the region.

The Department recognises that a number of our comments on the public transport elements, which were included in earlier drafts of the RSES, have been taken on board in the published draft. However, we wish to reiterate some comments and proposed amendments to ensure consistency between the draft RSES and Government policy.

Heavy Rail

The Department welcomes that the draft RSES recognises the priority of 'steady state' investment in the existing rail network and that this is referenced throughout the draft strategy. As stated in our previous comments, it is important that references to heavy rail within the RSES reflect, and are consistent with, the National Development Plan. The NDP states that the funding priority for the inter-urban rail network is –

'to protect the investment already made in our national railway system by funding maintenance and safety projects needed to maintain safety and service levels in railway operations.'

In line with this funding objective, the funding allocations committed under the NDP provide for a steady state level of maintenance and renewal across the Iarnród Éireann network. This represents a significant and recurring annual contribution towards the heavy rail network.

The draft RSES refers to a number of specific heavy rail projects which are not included in the NDP and, as already stated, the scope for investments in such projects between now and 2027 will be constrained. This includes the following references in the draft RSES:

- The upgrade and enhancement of the commuter rail line between Limerick and Nenagh and onward intercity line to Ballybrophy (pages 53, 158, 256 and 262).
- Investment in infrastructure on the Limerick-Waterford rail line (page 65).
- Creating a rail link between Limerick City and Shannon International Airport (pages 158, 253 and 262)
- The upgrade and enhancement of the Western Rail Corridor between Limerick and Ennis and onward line to Athenry (page 262).
- The Rosslare-Waterford rail line (page 287).

There are also a number of references to the possible reinstatement of the Limerick/Foynes rail link (pages 158, 162, 260, 262 and 269). As previously advised, the Department is aware that Shannon Foynes Port Company commissioned Iarnród Éireann to undertake a detailed design study of the line. While this study will aid future decision making regarding the reinstatement of this rail line, any

decision to re-open the line should be made in the full context of value for money and the benefits of this reinstatement to the larger network.

The key infrastructural requirements for Wexford town (point (i) on page 63) and RPO 20 refer to the movement of rail freight from Rosslare Europort. As set out in our previous comments, this would likely involve a number of major infrastructural changes to the port, including (but not limited to) the installation of lift-on lift-off machinery and would be a matter for the port authority itself

The draft RSES references the NDP commitments to examine higher rail speeds on a number of rail lines and the commitment for an evaluation of the economic benefits of high speed rail between Dublin-Limerick Junction and Dublin Cork. In this context, the following proposed amendment text is suggested for the second last bullet point under RPO 162 on page 162:

“Support feasibility assessments and investment in infrastructure to achieve higher speed intercity rail services.”

Finally, while it is noted that the reference to rail electrification (page 162) for the Southern Region is in the longer term, it should be recognised that there are currently no plans for electrification of the inter-urban rail network.

Rural Transport

The following amended text is suggested for page 153 under the section ‘*The Role of Transport in Enabling Access for All*’:

First paragraph

*“The planning process affords an opportunity to facilitate and deliver a more socially inclusive society through better design, greater integration and accessibility across all societal needs and disabilities. Transport is one of several key policy areas through which social inclusion can be effectively addressed. **Transport policies and investments will be developed to assist the greatest number of people with mobility, sensory and cognitive impairments in the shortest possible time with a particular focus on meeting the needs and opportunities of an ageing population.**”*

RPO 154

*“Role of Transport in Enabling Access for All – Investment in transport networks and services in the region that are socially inclusive and provide a quality of service, connectivity and facilities to meet all societal needs, (including mobility, sensory and cognitive impairments) and meet the needs ~~of aging cohorts~~ **and opportunities of an ageing population.**”*

Regional Policy Objective 163 on page 163 refers to review of local bus services including the rural transport programme. It should be noted that any review of the Rural Transport Programme is the responsibility of the Department of Transport, Tourism and Sport and the National Transport Authority.

3. Sustainability and Climate Action

The Department recognises that previous comments on climate action have been taken on board in the draft RSES. In relation to charging infrastructure, we welcome that there is now reference in the draft Strategy of CNG refuelling infrastructure along the TEN-T corridor as per our earlier submission.

In relation to adaptation, increased reference could be included to all forms of climate change adaptation. The detailed section on flood risk is welcomed; however negative effects of climate change can include more than flooding, such as increased precipitation including rain and snow, and high winds which could impact airports as well as other forms of public transport.

4. Roads

We wish to reiterate some of the previous points made on earlier draft RSES' in relation to roads:

- The National Development Plan (NDP) provides the investment framework for the national and regional roads programme from 2018 to 2027 and this Department and its agencies have to work within that funding framework and the Government's successor capital investment plans.
- NDP projects are currently in two main categories; those which are due to be constructed within the period of the Plan (in some cases subject to business case and development consent) and those which will be appraised and early planning work undertaken with a view to developing a pipeline of projects for future development in successor capital plans.
- Quite a number of the projects listed in the draft RSES fall into the category of projects to be appraised or are not identified in the NDP.
- With this in mind the aspirational nature of many of the projects listed, other than the projects where funding commitments are in place under the NDP, needs to be recognised, including the fact that such projects will be subject to appraisal and the sourcing of funding.

In relation to the references to the Limerick Northern Distributor Road in the draft RSES, the Department notes that this project is not catered for in the NDP and that as discussed with the relevant local authorities this scheme will need to be subject to thorough appraisal, including the impact on the costs associated with the Limerick Tunnel PPP contract.

The draft RSES states in relation to the metropolitan area transport investment priorities for Cork, Limerick and Waterford (paras 6.3.6.3 – 6.3.6.5) that “transport investment by the Government Departments, NTA and other agencies will be guided by” the priorities outlined in the RSES. As outlined above in practice the Department and its agencies have to operate in accordance with the provisions of the NDP and its successor capital plans and this should be referenced in the RSES.

5. Maritime

As an island nation, ports play a crucial role in facilitating Irish economic growth and prosperity and it is estimated that the ports handle 84% of Ireland's merchandise trade in volume and 62% in value terms.

National Ports Policy 2013 categorises Cork and Shannon Foynes Ports as Ports of National Significance (Tier 1) and Rosslare Europort and Waterford Port as ports of National Significance (Tier 2). The continued commercial development of these Ports is a key strategic objective of the policy. The policy mandates the Ports of National Significance (Tier 1) to lead the response of the State commercial ports sector to national capacity requirements, supported by the Ports of National Significance (Tier 2) and both Cork and Shannon Foynes are undertaking extensive redevelopment of port facilities.

At a European level both the Port of Cork and Shannon Foynes Port Company are designated 'core' ports within the TEN-T (*TransEuropeanNetwork-Transport*) Regulation and Rosslare Europort and Waterford Port are recognised as 'Comprehensive Ports'.

The Department welcomes that this is recognised in the draft RSES and its commitment under RPO 137 on page 146 to "*strengthen and develop the strategic international, national and regional economic roles of our Tier 1 Ports (Port of Cork and Shannon-Foynes Port) and Tier 2 Ports (Port of Waterford and Rosslare Europort);*"

6. Airports

The Southern Region includes four airports; two State airports (Cork and Shannon) and two regional airports (Kerry and Waterford). In relation to the latter, it should be noted that there have been no scheduled services operating from the Waterford Airport since June 2016. As a result, in respect of the Government's Regional Airport Programme, no capital funding grants have been provided to the airport since that time and grant aid towards operational expenses ceased from 2017. In light of the situation at the airport, last year the Department procured the services of independent consultants Ernst & Young (EY) to advise on the future options for the airport. The EY review also took into account a proposal received from Waterford Airport to expand the runway at the airport to accommodate commercial passenger jets and related works. Following a meeting of Government in October 2018, where the Minister provided his Cabinet colleagues with an update on the process, the EY review was provided to Waterford Airport. The Minister for Transport, Tourism and Sport intends bringing proposals on this matter to Government upon receipt and consideration of any views submitted by Waterford Airport. The Southern Assembly should be cognisant of any potential outcomes from this process in the context of the RSES.

On page 23 of the draft RSES under 'Our Strategy', a key enabler is identified as 'The Southern Region as Ireland's International Gateway at Cork, Shannon, Kerry and Waterford Airports and our Sea Ports'. This gives the impression that the Southern Region would be the sole international gateway for Ireland. It is suggested that this enabler be reframed in some way e.g. 'International Gateway to the Southern Region through our Airports and Sea Ports'. As above, Waterford Airport currently has no scheduled services operating from its site – domestic or international.

7. Sport

The National Sports Policy 2018 -2027 was launched in July 2018 to provide a framework for sport in Ireland and to provide a strategic agenda for Sport Ireland to 2027. The overarching goals of this policy are, to increase participations levels across sport and physical activity; to support increased

excellence from our high performance athletes; and to improve the capacity of national governing bodies and local sports partnerships to deliver sport and physical activity programmes. The policy further outlines the important role local authorities play in achieving such objectives. The implementation of this policy's 57 actions, including a requirement for local authorities to prepare Local Sports Plans, will be driven by the Sports Leadership Group, chaired at ministerial level by the Department of Transport, Tourism and Sport.

There is no reference to the National Sports Policy in the draft RSES and the lead role local authorities will play in implementing its key policy objectives. It is suggested that a regional policy objective supporting the NSP be included in the RSES, with the following text as a suggestion:

***Regional Policy Objective:** Local Authorities shall support the vision and objectives of the National Sports Policy, including working with local sports partnerships, clubs, communities and partnerships within and beyond sport, to increase sport and physical activity participation levels locally.*

8. Tourism

The following additional bullet point is suggested on page 95:

The Department of Transport, Tourism and Sport Policy Document People, Place And Policy Growing Tourism To 2025 makes a number of policy proposals that are relevant to the planning of tourism, namely;-

- *Protecting heritage assets through sustainable tourism*
- *Targeting high growth potential areas*
- *Incorporate Cultural and Sports-based Offerings*
- *Respecting Brand Architecture and the Environment*
- *Need to optimise Air and Sea Connections*
- *Need to facilitate inter-modal transport transfers*
- *Support for Cross-Border Tourism.*

*Department of Transport, Tourism and Sport
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