

**MWASP,
Mid-West Regional Authority,
Friar Court,
Abbey Street,
Nenagh,
Co. Tipperary.**

8th March 2012

NTA Submission on the Mid-West Area Strategic Plan

To whom it may concern,

The National Transport Authority (“the Authority”) welcomes the opportunity to comment on the above plan. The plan is defined as a document that sets out the “planning, land use and transportation strategy” for the Mid-West Region. While the Authority fully recognises and acknowledges the necessity of developing a strategic plan for the region, we do have concerns with regard to some of the details, statements and proposals set out in the draft plan. We have set out below some of these concerns.

1. While the uncertainties around future population growth are noted in the document, the Authority would not agree with the objective in Section 5.1 that “the relative population of settlements in the hierarchy as envisaged by the settlement strategy is maintained regardless of overall actual rates of growth”. This proposal runs counter to the principles underpinning integrated land use and transport. It is the view of the Authority that a prioritised, sequential approach should be pursued whereby the largest centres, such as Limerick, Shannon and Ennis, are prioritised for growth.
2. There is a very high emphasis on new road development in the draft plan. While the rationale for many of the proposed road projects is clearly evident, it is not clear that the correct balance with public transport and walking / cycling modes has been achieved. This is reflected in the continued very high level of car use for the region in future years – 91% in 2030 even under the ‘High Cost’ investment scenario.
3. Allied to the last point, the Government’s policy document “Smarter Travel: A Sustainable Transport Future”, envisages that commuting by walking, cycling, public transport and car sharing will rise to 55% of journeys by 2020 and that the “total kilometres travelled by the

car fleet in 2020" will not rise significantly from 2009 total car kilometres. It is not clear how the draft strategy aligns with the national objectives of Smarter Travel.

4. The draft strategy proposes a considerable number of "Intervention Measures" in Appendix A and Appendix B. These include:
 - a) Free bus services for 12 months (incl. Limerick Orbital, excl. Limerick Expressway) - €24.6m
 - b) Free services Limerick-Nenagh-Ballybrophy for six months - €3.1m

These are identified as "capital cost" items. However it is unlikely that they could properly be funded under a capital programme and would instead constitute "current" expenditure. In any event, in the current economic circumstances, it is unrealistic to anticipate that these items could be funded.

5. The plan proposes, as an Intervention Measure in Appendix B, "double scheduled bus frequencies" at a capital cost of €10.2 million. The basis for this requirement or cost is not clear.
6. Within the Intervention Measures, a number of "showcase cross-city bus corridors" are proposed, identified as "BRT1"; "BRT2" and "BRT3". Reference is made in the text to Bus Rapid Transit corridors and it is not clear what exactly is intended under these interventions.
7. There are several other "Intervention Measures" which could conflict with existing programmes and policies. These include:
 - a) Statutory Workplace Travel Plans – the Authority notes the measures to implement "statutory" workplace travel plans and "statutory" school travel plans. It is unclear what is meant by the term "statutory", whether it means mandatory or legally-binding. In the case of new workplaces, the Authority is supportive of planning conditions requiring Travel plans for developments of a certain size and is currently finalising guidance on this matter for Local Authorities. In the case of existing workplaces, the Authority has been implementing the Smarter Travel Workplaces programme for a number of years and recommends that the agencies responsible for MWASP liaise with the Authority on these matters in order to use the experience gained in this area of work. For the purposes of MWASP, the Authority recommends that the term "statutory" is removed from this measure.
 - b) In the case of schools, the Authority, in conjunction with An Taisce, has entered into an agreement with the DTTAS for the delivery of the travel module of the Green Schools programme. It would appear unnecessary, therefore, to implement a separate "statutory" school travel plan programme alongside this existing programme. Accordingly, the Authority would recommend that this measure is removed from MWASP and replaced by one which aims to facilitate and assist the Green Schools travel module.

- c) Items such as the introduction of a “Mid West Car Sharing website” and “Transport for Mid West” website, duplicate initiatives already underway. In the case of car-sharing a national car-sharing website has been developed and is now operational (www.carsharing.ie). In relation to transport information, the Authority is moving to brand the main transport operations under the “Transport for Ireland” umbrella. A Transport for Ireland website has been established and it is intended to act as the main source of public transport information. It will include real time passenger information and a national journey planner. Duplicating these initiatives does not appear appropriate.
8. The basis for some of the proposed “Intervention Measures” is unclear. For instance, the document doesn’t indicate the justification for the “provision of raised zebra crossings on all roundabout arms” at a projected cost of €5 million. It may be that this measure is warranted at certain locations, but the strategic plan appears to require its implementation at all locations in the region by the inclusion of the words “on all roundabout arms”.
 9. The Authority recommends that all cycle infrastructure is planned and designed according to the National Cycle Manual and reference to same is made in the plan. The identification of the cycle networks, with reference to the networks for other modes, is the fundamental first step in cycle planning, and one which should be undertaken in advance of infrastructure investment in cycle lanes or tracks. This is of particular relevance for measures S3WC1 and S3WC2 which together propose €25 million investment in shared use cycleway/footways and cycle lanes on residential roads. The merit of these two forms of cycle provision should be measured against the principles and design guidance set out in the National Cycle Manual.
 10. Measure S3WC9 provides for an investment of €31.3 million in “Off-street cycle/pedestrian Greenways”. This equates to almost 10% of the overall costs of the two MWASP transport packages combined. The Authority would be concerned with spending this proportion of the total investment on infrastructure that would serve mainly leisure and tourism trips in the region, particularly when set against the future mode split referred to in point no. 2 above.
 11. Section 6.2.1 advocates the setting up of a special Limerick transportation unit, being defined in as “a regional multi-modal transportation office mandated with designing and rolling out the proposed transportation measures”. The Authority is unconvinced of the need to establish a new office of this nature and would query why the proposals cannot be delivered under the current structures.
 12. In several locations in the draft plan, the presented information related to public transport is incorrect or out of date. For instance, some of the rail transport references are now out of date given more recent changes since the text was originally written. In addition, the installation of real time passenger information is being undertaken in Limerick in the current year and engagement has started with the local authorities on exact installation locations.

The text of the document would benefit from some amendments to ensure that it correctly reflects the current situation.

Overall, given the above issues, the Authority would not support the adoption of the plan, as currently formulated, as a statutory policy guidance document.

I trust that the views of the Authority will be taken in to consideration by the Mid-West Regional Authority in finalising the MWASP.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Hugh Creegan", is written over a horizontal line.

Hugh Creegan,
Director of Transport Planning and Investment.