

Eastern & Midland Regional Assembly,  
3rd Floor North, Ballymun Civic Centre,  
Main Street,  
Ballymun,  
Dublin 9,  
D09 C8P5.

Dún Scéine, Lána Fhearchair  
Baile Átha Cliath 2, D02 WT20

Dún Scéine, Harcourt Lane  
Dublin 2, D02 WT20

t 01 879 8300

info@nationaltransport.ie  
www.nationaltransport.ie

12<sup>th</sup> April 2019

**RE: Eastern and Midland Regional Assembly (EMRA) - Regional Spatial and Economic Strategy (RSES)**

Dear Sir / Madam,

This report has been prepared by the National Transport Authority (the “NTA”) in response to the notice sent by EMRA on the 15<sup>th</sup> March 2019, in accordance with section 24 (6) of the Planning and Development Act (2000, as amended) (the “Planning Act”).

## **The Transport Strategy and the RSES**

### **Review of the Transport Strategy**

The review of the Transport Strategy for Greater Dublin Area 2016-2035 (the “Transport Strategy”) will commence in the coming years, in line with the provisions of Section 12 (16) of the Dublin Transport Authority Act, which provides for such a review every 6 years. This review will incorporate a re-examination of travel demand across the Greater Dublin Area based on the most recent forecasts of population and employment distribution. The NTA is of the view that it is more appropriate at this point, and through this process, that the requirement for additional rail lines, or for expediting certain elements of the strategy, is identified.

### **Consistency of the RSES with the Transport Strategy for the Greater Dublin Area (2016-2035)**

The current Transport Strategy supports the delivery of the Draft RSES, as published in November 2018. This draft was prepared on the basis that the land use patterns and associated demand for travel would be served by the measures contained within the Transport Strategy. The NTA and

EMRA cooperated closely throughout the making of the Draft RSES and this approach was reflected in the NTA's submission on the Draft RSES which stated, *inter alia*, the following:

*On review of the Draft RSES, the NTA is satisfied that our key objectives in terms of transport priorities for the period of the RSES are catered for, and that the overall policy platform of the RSES supports the integration of land use and transport planning. As such, the Draft RSES is consistent with the Transport Strategy, as required under Section 23 (7)(c) of the Planning Act.*

On review of the Material Amendments to this draft, the NTA is of the view that the Draft RSES, as amended, is not consistent with the Transport Strategy. The Draft RSES would be considered to be consistent with the Transport Strategy if the following recommended changes are incorporated:

### Recommendations

#### 1.1 Amendment no. 69 – Amend Rail Projects

The following changes to the above material amendment are required in order to ensure consistency with the Transport Strategy:

- (i) Remove reference to the electrification of the rail line further north of Drogheda and further south of Hazelhatch;
- (ii) Alter the reference to the Navan Rail line from “implementation” to “investigate the feasibility”;
- (iii) Remove reference to a Mid Term Review of the Transport Strategy;
- (iv) Remove reference to underground rail links to UCD and Knocklyon;
- (v) Remove reference to Luas network expansion to Hazelhatch, Booterstown and Blessington;
- (vi) Remove reference to an evaluation of underground metro routes inside the M50

#### 1.2 Amendment no. 70 – Amend Road Projects

The following change to the above material amendment is required in order to ensure consistency with the Transport Strategy:

- (i) Include M50 Dublin Port South Access

#### 1.3 Amendment no. 113 – Rail Projects for the Region

The following changes to the above material amendment are required in order to ensure consistency with the Transport Strategy:

- (i) Remove reference to the electrification of the rail line further north of Drogheda and further south of Hazelhatch;
- (ii) Alter the reference to the Navan Rail line from “implementation” to “investigate the feasibility”;
- (iii) Remove reference to a Mid Term Review of the Transport Strategy;

- (iv) Remove reference to underground rail links to UCD and Knocklyon;
- (v) Remove reference to Luas network expansion to Hazelhatch, Booterstown and Blessington;
- (vi) Remove reference to an evaluation of underground metro routes inside the M50
- (vii) Include M50 Dublin Port South Access

#### 1.4 Amendment no. 114 – Road Projects for the Region

The following change to the above material amendment is required in order to ensure consistency with the Transport Strategy:

- (i) Include M50 Dublin Port South Access

#### 1.5 Amendment no. 117 – Amend RPO 8.16 – Dublin Airport

The following change to the above material amendment is required in order to ensure consistency with the Transport Strategy:

- (i) Remove reference to heavy rail access to Dublin Airport

### **Other Matters**

The NTA makes the following recommendations in order to provide clarity in some areas and in order to strengthen the RSES in terms of the integration of land use planning and transport planning in the EMRA.

#### Recommendations

##### 2.1 Amendment no. 10 – New RPO – Objective Quantitative Assessment of Proposals for GHGs

The NTA is not opposed to the objective to assess the impact of land use and transport developments on greenhouse gas emissions. There is a concern, however, that an overly prescriptive or solely quantitative approach may lead to inappropriately detailed assessments being required at all levels in the planning process, in particular at the local level or scheme-specific level. An associated concern relates to the availability of the appropriate modelling tools which could provide the necessary quantitative precision which would be of benefit to the process. Furthermore, given the requirements already in place which come from the SEA and EIAR Directives and transposing legislation, it is not clear why such an objective is required. The NTA recommends that this objective is altered to remove the term “quantitative” and to include for regional-level assessments only, in accordance with RPO 7.28.

## 2.2 Amendments no. 31 and 40 – Amend RPOs – Maynooth and Navan

The NTA has some concern in relation to the manner in which the Maynooth Outer Orbital Route and the Navan Distributor Roads are described as infrastructure which would support future development, without any reference to how the additional capacity provided by these schemes could be exploited for the improvement of the public transport, walking and cycling networks within the towns. The NTA recommends that additional text is added which states that these road schemes would also provide opportunities for the reallocation of road space within Maynooth and Navan Town Centres, in accordance with section 5.8.2 of the Transport Strategy.

## 2.3 Amendment no. 38 – New RPO – Bray

The NTA recommends that the following text is removed from this amendment:

“to ensure its continued renewal, maintenance and improvement to a high level to ensure high quality of frequency, safety, service, accessibility and connectivity”

And that “and services.” Is added to the end.

## 2.4 Amendment no. 45 – New RPO – Naas

The NTA recommends that this objective is reworded as follows:

“Support the delivery of new and enhanced public transport infrastructure in Naas and Sallins, including Park and Ride and interchange facilities as identified by the NTA and Kildare County Council.”

## 2.5 Amendment no. 108 – Amend Section 8.3 Guiding Principles for Integration of Land Use and Transport

- In submitting on the Draft RSES, the NTA recommended the removal of the principle to support reverse commuting, as it implies that investment in employment would be redirected away from higher order centres into other settlements which do not have the capacity to cater for such growth in any manner other than by car-based patterns of development. The NTA therefore welcome its omission by means of Material Amendment and recommend that the final RSES reflects this.
- In relation to the second bullet point, the NTA reiterates our position on the assessment of the impacts of transport infrastructure on greenhouse gas emissions as stated in recommendation 2.1 above.
- Associated with recommendation 2.2 above, the NTA recommends that a guiding principle is inserted which states where additional road capacity is provided within or around any town which has an objective to cater for traffic that currently uses the road network in central areas and their immediate environs, that this additional capacity would be used for the improvement of the public transport, walking and cycling networks within the towns through the reallocation of road space to these modes.

2.6 Amendment no. 112 – New RPO – Regional Strategy for Freight Transport

The NTA recommends that, in order to provide clarity as to the roles and responsibilities of various agencies, this RPO is amended to state that EMRA will *support* the preparation of a regional strategy for freight transport.

The NTA will continue to be available to assist and cooperate with EMRA throughout the finalisation of the RSES and I trust that the views set out above will be taken into account during that process.

Yours sincerely,



Michael MacAree

**Head of Strategic Planning**

CC Minister for Transport, Tourism and Sport  
Minister for Housing, Planning and Local Government