



WDC Response to the Consultation on the Draft National Investment Framework for Transport in Ireland (NIFTI)

Submitted to Department of Transport

28th May 2021



Introduction

The Western Development Commission is a statutory body with a remit to promote and encourage economic and social development in the Western Region (counties Donegal, Sligo, Leitrim, Mayo, Galway, Roscommon, and Clare). The WDC operates under the aegis of the Department of Rural and Community Development. The WDC welcomes the opportunity to submit its views on the Draft National Investment Framework for Transport in Ireland (NIFTI).

The WDC notes that while the NIFTI is focused on capital infrastructure investment, expenditure must be integrated with broader policy issues to ensure the provision of quality transport infrastructure to underpin the economic development of the region. The benefits of investment in regional transport infrastructure must be fully realised by ensuring that, alongside transport investments, there are broader regional policies to enable regions to make the most of their transport assets.

The WDC has set out its response below following the consultation question format. The WDC acknowledges that there are areas of repetition given the linkages across several questions. If there are any queries please do not hesitate to get in touch, lukemcgrath@wdc.ie.



Section 1: Background Profile

Are you a:

Government Agency Representative

Please state your name and the name of the organisation you represent (if any) in making this submission:

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Section 2: Supporting the Project Ireland 2040 Vision

The National Planning Framework has established a clear direction for the sustainable development of Irish society in the coming decades, as articulated by its ten National Strategic Outcomes. How can transport investment support this vision?

The National Development Plan (NDP) remains the key mechanism through which the objectives of the National Planning Framework (NPF), Project Ireland 2040, including the ambition to achieve 75% population growth in the regions, can be achieved. The NPF notes the “*need to manage more balanced growth between these three regions because at the moment Dublin, and to a lesser extent the wider Eastern and Midland area, has witnessed an overconcentration of population, homes and jobs. We cannot let this continue unchecked and so our aim is to see a roughly 50:50 distribution of growth between the Eastern and Midland region, and the Southern and Northern and Western regions, with 75% of the growth to be outside of Dublin and its suburbs*” (Sec 1.2, NPF). Ensuring that the national transport network enables this overarching vision is then the key priority of NIFTI. Publicly funded transport investment can either reinforce the ‘business as usual’ scenario or be used as a tool to achieve the priorities of the NPF for more effective regional development.

The development of regional growth centres as planned under Project Ireland 2040 will require investment in an accessible and efficient public transport network. Better links between towns and their respective hinterlands will be needed. The development of a coherent transport system should also ensure effective interchanging and links to airport and port infrastructure as well as to other important centres. Developing good local transport networks will support the growth of these designated centres as envisaged under Ireland 2040.

The WDC welcomes the regional population and employment targets as set out in Ireland 2040-Our Plan. These targets are ambitious and will need to be supported by transport investment to



enable the targets to be met. To this end, key regional projects that will drive regional employment and enterprise growth, which in turn will drive population growth, must be prioritised. The WDC's recent submission on the Review to Renew consultation outlines several key regional transport projects, see [here](#).

One of the important contributory factors to the current pattern of development is the historical focus on transport investment to and from the capital. The priority given to improving the radial road and rail links between the provincial cities and Dublin ensured that Dublin was the most accessible city while at the same time there were comparatively poor intraregional links between each of the other cities, stifling development within and between and the other regions. Public investments of a 'national' nature which are mainly located in the capital contribute strongly to its economic growth and primacy. The WDC argues that infrastructure along with innovation and the '3Es' (Enterprise, Employment and Education) represent the key components for effective regional development as detailed [here](#). When these three areas complement and support each other, they drive regional growth.

Section 3: Delivering the National Strategic Outcomes

How can transport investment support the delivery of compact growth in our towns and cities in the coming years?

The overarching aim of the NPF is to rebalance population and employment growth with the ambition to achieve 75% population growth in the regions. In this context, the delivery of enhanced regional accessibility (NSO 2) and compact growth (NSO 1) in towns and cities and will be critical. Transport is enabling infrastructure and there is an interdependence between NIFTI and the NPF, in that to reach NPF population goals transport investment is needed. This needs to be prioritised in key regional projects that will support and promote regional employment and enterprise growth, which in turn will drive regional population growth.

Transport Investment and Patterns of development, 2nd tier cities

Background paper 11 notes that "achieving NSO2 will require investment in infrastructure and services to reduce travel times between those identified regions and cities of scale other than Dublin". The WDC welcomes this in that it supports the need for the development of these 2nd tier cities. However, the reference to the idea of 'sequencing' transport investment raises some concerns.... *in order to encourage urban consolidation and limit sprawl. This may require some investments in urban transport taking place in advance of investments in interurban and regional connectivity.* The WDC considers that this sequencing, by delaying investment in improved interconnectivity between the 2nd tier cities, would impede these cities' growth and the achievement of the regional population growth targets which is the overall central objective of Project Ireland 2040. The WDC supports the concept of compact growth but believes other means (such as planning) will be much more effective in delivering this, rather than delaying improved interurban connectivity.



In addition, the planned timing of road investment projects along the Atlantic Economic Corridor (most are currently scheduled to occur in the later stages of the Plan) suggest a lack of priority. 'Enhanced regional accessibility' is NSO 2 of which the Atlantic Economic Corridor is a key element. It also suggests a lack of understanding as to the role of infrastructure generally, and transport connectivity, in enabling development and the consequences of the underinvestment which has so negatively impacted the development of the north-west. There has been a tendency for the Greater Dublin Area (GDA) to absorb much of the transport budget to ease congestion there. This mustn't happen in the context of being able to deliver Project Ireland 2040 regional population targets. Priority must be given to the delivery of regional transport projects to ensure growth in regional centres and the overall delivery of Project Ireland 2040 objectives.

Transport Investment Priorities

A key issue for the development of all areas is transport accessibility. Without this, increasing further densities especially for employment will be a challenge. The development of new services and expansion of existing services is needed but current demand may be latent as it takes time for people to respond to and take up new service provision. Measurable access to urban centres of scale (with target timelines) would be a useful tool here. While the NDP commits to maintaining current journey times, in many cases, regional interurban journey times need to be improved, as Background paper 11 shows.

Rail

It is important to consider the rail network as an asset with the potential to enable development in many regions. While intercity rail services offer an alternative for long-distance trips, the rail service can also be an important transport mode for shorter distance commuting (e.g. Athenry and Oranmore to Galway city service). There may be potential for further expansion of commuting services along the existing intercity lines, serving Galway, Athlone, Sligo and other centres given the stated population and employment growth targets.

Asset Condition. Background paper 11 notes that *deterioration in asset condition (rail) has led to reduced line speeds in a number of parts of the rail network*. Investment in improving asset conditions on existing lines should be undertaken before any consideration of investment in line speeds (electrification or other) elsewhere.

Service levels. On some lines, it is noted that service levels are low enough to discourage demand. Given the value of rail as a low carbon transport mode, serving a population that is growing and with an increasing need to reduce carbon emissions, improved service levels on interurban routes should be delivered to ensure maximum take-up.

Line Speeds. It appears that those lines earmarked for further investment in improving line speeds are those lines already with the highest speeds. This seems to contradict the aims of Project Ireland



2040 and the need for regional parity to achieve the regional population targets noted in Background paper 11, p. 37.

Bus Services

Similar to the rail network, when considering the bus network, there can be a tendency to focus on connectivity between regional centres and the capital. Some of these routes are very well served, especially considering both public and private services. For example, the Galway City to Dublin bus service. When discussing the need to invest in bus services, it would be more appropriate to highlight bus services that are currently under-developed and under-served.

How can transport investment enhance regional accessibility in the coming years?

To achieve the vision of Project Ireland 2040 regional and rural accessibility must be enhanced. Improvements in services and reliable journey times to and between centres of scale, and pursuing compact growth are key components to ensure a more even distribution of economic opportunities across the regions. Accessibility and connectivity are vital for entrepreneurial growth. The WDC recognises that investment in transport infrastructure will not achieve regional growth by itself, but quality transport infrastructure is a necessary element of any strategy for regional growth. The WDC's recent submission to the Review to Renew consultation highlighted several key transport projects vital for regional development, see [here](#).

The benefits of investment in regional transport infrastructure must be fully realised by ensuring that, alongside transport investments, there are broader regional policies to enable regions to make the most of their transport assets. Better links between towns and their respective hinterlands will be needed. The development of this transport system should also ensure effective interchanging and links to airport and port infrastructure as well as to other important centres. Developing good local transport networks will support the growth of these designated centres as envisaged under Ireland 2040. The WDC welcomes the acknowledgement in Background paper 11 that the achievement of NSO2 *“will require investment in infrastructure and services to reduce travel times between those identified regions and cities of scale other than Dublin.”*

New, and developing travel patterns are also important in the context of regional accessibility. Transport investment should augment active policies to encourage and facilitate new work practices that can help manage and reduce future travel demand sustainably and cost-effectively that also delivers on quality-of-life benefits. Given the likely considerable increase in more flexible and more remote working, post-pandemic, a trend that had existed pre-pandemic, there are opportunities for employees to be more dispersed, in line with current population patterns. Towns, smaller centres, and rural areas provide a variety of opportunities as locations for employment across many sectors.

Rural dwellers' transport issues are of particular importance. There seems to be some imbalance in the focus given to transport issues for cities against rural transport issues. The majority



of the population will continue to live in the historical settlement pattern and spatial planning is unlikely to make considerable changes even in the medium term. A transport investment framework must acknowledge current spatial patterns as well as any future growth in demand.

The WDC notes the importance of access to public services as an important area for transport investment. Good transport, in terms of journey times on the road network and better public transport services, is needed to access all kinds of services. Changes have been taking place in service provision with centralisation and consolidation of some service provision meaning longer journeys are required. For example, health services are increasingly concentrated in centres of excellence, especially for critical illness such as cancer and various specialist services. In the Western Region, better transport access is needed to serve the entire catchment of Galway University Hospital, which serves the West and North west regions.

How can transport investment strengthen rural economies and communities in the coming years?

Improving connectivity for rural areas is essential as access to education, employment, services, and markets are all necessary to strengthen our rural economies and communities. Travelling for work, business or educational purposes is important, but most journeys are made to reach services. Rural dwellers tend to be at a greater distance from services than their urban counterparts and so journeys tend to be longer and private car based. Those without access to a car are particularly disadvantaged. The provision of safe, reliable, and affordable rural transport infrastructure and services is essential to facilitate rural markets, services, enterprise and employment opportunities, the delivery of health and education, and to allow for the effective functioning of modern supply chains. NIFTI must recognise the wider socio-economic benefits of transport infrastructure such as social inclusion, health and community.

The National Household Travel Survey (2017) compared the proportion living within 15 minutes' walk of key services (e.g. shop, post office, chemist, pub or restaurant, or a bus stop) in rural areas with the national picture and found that 40% of all rural respondents did not live within 15 minutes of *any* of these services. Other services such as banking, libraries and leisure services like swimming pools may be used less often but have much higher average distances, again increasing the need for motorised transport (most likely a car). The distance to a hospital is greatest, and while some outreach services are provided, many people will need to attend appointments and ongoing treatment services in these hospitals. Good transport, in terms of journey times on the road network and better public transport services, is needed to access health services generally and to hospitals in particular.

As the NIFTI Background paper 12 notes in relation to the NPF's Hierarchy of Settlements and Related Infrastructure *"This structure of service delivery is essential to the provision of high-quality public services in a cost-effective manner. However, ensuring that these services reach rural areas relies on an effective and efficient transport system"*. The paper also discussed the TII analysis of



drive times to settlements with a population of 10,000 or more. These towns are very important centres for services in the Western Region. Ensuring good quality access will be important and due to the reliance of rural areas on private cars for transport, the accessibility of these services to rural areas was abstracted as the drive time from a rural area to a major settlement. While this is the current situation, there mustn't be a continued assumption that the private car is the main or only options for travel to services. There must be good development of public transport so that services can be used without a car. This is essential for those without access to a vehicle and will also be increasingly important in the context of decarbonising transport.

Transport disadvantage can reduce people's ability to access employment and as such this is a significant economic impact which can give rise to economic and social exclusion. Poor transport access can limit the economic potential of individuals, communities and areas and its impacts are broader than social exclusion. In addition, access to comprehensive and reliable public transport services is particularly important for young people in rural areas whose independence is restricted if they are relying on family or friends for transport. Greater distance to services tends to reduce options for travel and in particular, given the lack of public transport and the distance to public transport services, increases reliance on car travel in rural areas. Connectivity is hugely important for people who live and work in rural areas. Improvement and further integration of rural public transport services will enable people to continue to live in rural areas and to access work, education and social activities. Thus, investment in public transport and active travel in rural areas, as well as in road infrastructure is essential to the economic and social well being of rural areas and as most people will continue to live in the current pattern so it is important to plan services for where people live now.

"Our Rural Future" the Rural Development Policy for 2021-2025¹ commits to providing improved rural public transport services and pilot new transport initiatives to enhance the quality of life for people in rural areas. It also commits to delivering expanded Local Link services through the National Transport Authority (NTA) Connecting Ireland, Rural Mobility Plan. These commitments must be well funded under the NIFTI. Our Rural Future also notes that connectivity is hugely important for people who live and work in rural areas and that Improvement and further integration of rural public transport services will enable people to continue to live in rural areas and to access work, education and social activities. In this context, there is a commitment to protect and expand regional bus connectivity and connectivity between towns and villages in rural Ireland. There is also a commitment to the development and implementation of a Sustainable Rural Mobility Plan which will introduce a public transport service standard under which all settlements over a certain size in terms of population, combined with employment or education places, will have a service connecting them to the national public transport system. This commitment and the definition of a service standard will be very beneficial to rural connectivity. This service standard is underpinned by research carried out by the (NTA). It is important that this Plan is progressed quickly and that the investments required to meet the service standards is made promptly.

¹ <https://www.gov.ie/en/publication/4c236-our-rural-future-vision-and-policy-context/>



How can transport investment deliver sustainable mobility and encourage modal shift in the coming years?

The WDC's Western Region is largely rural (66% of people living outside settlements of 1,500) and sustainable mobility for rural dwellers is not often considered, so our response addresses rural issues specifically. Under the NPF definition (areas outside towns of 10,000) 80% of the region's population live in rural areas. While EVs are one very important low-carbon transport solution, public transport, walking and cycling also have important roles to play in rural areas. It should be recognised that unless driving a car, very often more than one mode of travel is needed to complete a journey in rural areas. To achieve modal shift it is therefore essential to ensure reliability in transitioning between modes, as any mismatch or delays in one service can lead to very long waiting times for the traveller, or a failure to complete the journey.

While Mobility as a Service (MaaS) is not yet mature, there are opportunities to develop apps or websites which allow users to plan, book and pay for their travel over multiple modes. Addressing issues for multi-modal travel is important. 'Park and ride' should include parking at train stations or places to catch bus services. Lack of safe, available parking can be a disincentive to longer public transport journeys and should receive more investment. Likewise, the fares need to be competitive for shorter journeys on the mainline rail to encourage travel to regional cities and towns by rail. Bike parking which is secure and dry should be provided at rail stations and key bus stops. Looking to the future there is potential for innovation in transport infrastructure providing local transport hubs (size and type varying by location) where all transport services for that place (which might be in a town or even just at a crossroads) come together and which provide safe, comfortable waiting areas and may also link to last-mile services such as a shared bike or car share centres or rideshare pick up points, shared taxi or DRT services. The type and size of infrastructure needed would be determined by the type of location but would represent a visible and useful access point for all modes.

To improve public transport use, the level and timing of rail services are important. Regularly scheduled services are crucial, but to allow the use of mainline rail for commuting to work services must arrive into regional towns at times that allow for work travel. Fares need to be competitive for shorter journeys on the mainline rail to encourage travel between regional cities and towns by rail. Rural commuters using the mainline service should be able to avail of the Taxsaver incentive to use public transport to and from work. In the Western Region, it is currently only available on services between Athenry and Galway.

Private bus operators provide a significant proportion of scheduled bus services between cities and towns in the Western Region but there is little data on passenger numbers or frequency. This can lead to underestimation of the use of public transport in the region. Data on private bus services and passenger numbers should be collected similarly to that for Irish Rail and Bus Eireann. Integration, at least to some extent, of the timetables of the different bus operators would be helpful to users who may be connecting across different services. Where a bus service exists, bus stops or covered bus shelters, signage and real-time arrival and departure information should be available.



Furthermore, an information app on availability and real-time arrival should be developed to ensure that real-time data is available on rural transport. This is especially important in rural areas where public transport is less frequent. There is considerable potential for increased use of the Local Link rural transport service, particularly among those who do not have access to a car and may currently need to be driven. Promoting the existing services in their catchment areas and developing suitable timetables in consultation with potential users will help increase service use, along with the availability of real-time data and user apps.

Active travel can also play a role in rural areas, normalising walking and cycling as viable travel options in rural areas is essential. They should not be considered unusual, risky or the preserve of a small minority. This normalisation will occur as participation increases but also as the infrastructure for active travel is improved and the options are more visible and safer. Greenway developments are important and promote positive low-carbon cycling culture, but they often have a focus as a tourist attraction and may not connect to town centres. They should connect to town and village centres and be designed to function as a viable low-carbon transport network for travel to work, school and to use local services. While in many situations rural people have no option but to drive to their local town, there should be an effort to encourage walking between shops or services within the town, leaving the car parked in one spot for the duration of the visit. Any planning for new retail or other services should require good access for walking and cycling. Safe covered places to park bicycles should be available at several points in a town (or at a transport hub). Increasing uptake of e-bikes (and e-bike shares) should also form a part of improving sustainable mobility in rural areas. They connect people to other modes or make slightly longer journeys (to work or for other services) easier and can be a useful last-mile option. Local authorities should assess the access roads within a 10km radius of towns to ensure they are as safe for cyclists. In many situations, small changes will make the journey safer and more comfortable for cyclists, while signage will remind drivers of the need to be aware of cyclists as well as highlighting cycling as a viable travel option. As well as having tourism benefits, Greenways should be planned as viable low-carbon transport routes to town and village centres.

How can transport investment in surface access support high-quality international connectivity via our ports and airports in the coming years?

In the context of Project Ireland 2040, high-quality international air connectivity will be needed to support access through Shannon and Ireland West Airport Knock (IWAK) as well as Dublin and Cork. Better international connectivity through the ports of Shannon Foynes, Waterford, Cork, and Rosslare is needed as well as Dublin Port.

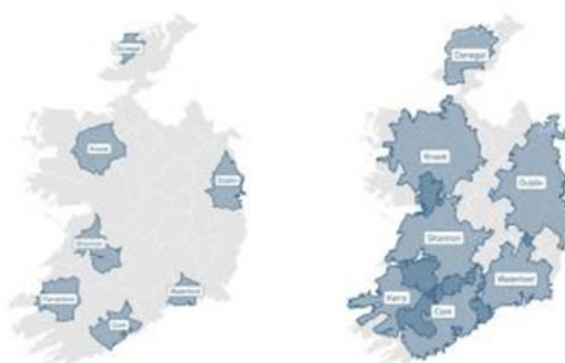
Airport Catchments

Before the pandemic, there was an increasing concentration of air passengers travelling through Dublin airport compared to other airports. For example, in 2014, Dublin accounted for 81.9% of all passengers (total 26.5 million), compared to 85.6% in 2018 (total 36.6 million). This represents an increase of 9.6 million passengers in 4 years, a 44.2% increase, with Dublin Airport accounting for



95.2% of total passenger growth in that period. An ever-increasing share of passenger traffic through Dublin Airport is not in the State's best interest, from a safety and security perspective, as well as not effectively supporting regional industry and international tourism and is counterproductive in delivering Project Ireland 2040 targets.

Maps 1 & 2: 30-min and 60-min catchment areas for Ireland's airports



Ireland West Airport serves a very large catchment relative to some of the other airports. The planned road improvements for the North West will help support greater traffic through IWAK, which in turn will allow the airport to better serve the catchment to its north including Sligo – a designated regional centre under Project Ireland 2040. The planned road improvements must be prioritised. Similarly, Donegal airport serves a large catchment within a 60-minute radius and given the geography of Donegal, the relatively poor surface accessibility and the likely impacts of Brexit, mean that it is important that support for Donegal airport continues. Shannon Airport is the second largest airport in Ireland (in terms of the capacity of the airport campus) and is a critical element in the transport infrastructure of the mid-west region, serving the significant industrial cluster of Shannon and the wider catchment as illustrated in the maps. It is therefore important that it operates optimally to help deliver the objectives of Project Ireland 2040, *to enable the cities of Limerick and Galway on the Western seaboard, to each grow by at least 50% to 2040 and to enhance their significant potential to also become cities of scale*².

Industry

Exporters are concerned with the ever-increasing concentration of traffic through Dublin Airport. For example, the Irish Exporters Association (IEA) advocate for support for better air connectivity from the West of Ireland such as direct access to a European hub airport. IEA research³ noted that of

² <https://www.gov.ie/pdf/?file=https://assets.gov.ie/166/310818095340-Project-Ireland-2040-NPF.pdf#page=1> p.22.

³ <https://irishexporters.ie/wp-content/uploads/2019/10/IEA-Draft-Transport-Paper.pdf>



those IEA members surveyed many said that they would use a different Irish airport as their primary route to move goods from Ireland if:

- There were more frequent flights from another airport – 36%
- Road networks between primary distribution centre and another airport were improved – 23%
- Another airport was upgraded – 14%.

International Tourism

Relatively poor direct international air access is a factor in the relative weakness of the tourism sector in the North West and parts of the West. The growth in popularity of ‘short-break tourism, coupled with the inaccessibility of the region compared to other regions has made it difficult to compete in this market. In contrast, improved international air access via Dublin airport has supported tourism growth there.⁴ The WDC considers that with Dublin Airport now operating at or near capacity, and capacity available at other airports such as IWAK and Shannon, cost-efficient and accessible alternatives to Dublin should be utilised and promoted. Shannon, IWAK and Donegal are important airports serving the Mid-west, West and North-west of the country and policy needs to effectively support them.

Ports

Brexit has had a greater impact on traffic from and to Irish ports and the UK landbridge became a much less attractive route to continental Europe. This had significant impacts on port traffic highlighting the value and importance of ports across the regions, particularly Rosslare, Cork and Waterford. Both Cork and Rosslare have increased direct freight services to Europe as an alternative to the UK landbridge, with significant growth at Rosslare⁵ (though Rosslare was not even referred to in Background paper 4. Waterford Port has expanded its rail freight offering with a new twice-weekly rail freight service in each direction between Ballina, County Mayo and Waterford Port. As well as an alternative transport mode for business in the North-west, this has potential for over 5,000 truck movements a year to switch from road to rail, with a resulting reduction in road congestion, and 75% reduction in emissions per unit. The development of these ports highlights their intrinsic value as well as their potential to promote regional growth. The development of these routes also highlights their geographic benefit to parts of the western seaboard in accessing European markets.

⁴ <https://westerndevelopment.ie/wp-content/uploads/2020/09/WDC-PolicyBrief-no.3-Final.pdf?dl=1>

⁵ <https://www.irishtimes.com/business/brexit-delivers-record-freight-for-rosslare-on-ferries-to-mainland-eu-1.4472331>



Trans-European Transport Network- Core network

The discussion on the Trans-European Transport Network in Background paper 4 is useful in highlighting potential opportunity to improve connectivity to Europe. However, it is not entirely clear on a couple of points.

1. North Sea-Mediterranean. There had been an understanding that there was a spur to Shannon/Foynes Port/Limerick, though this is not displayed on the map of the Current Ten-T core network. If so this should be highlighted along with the opportunities it provides.
2. Atlantic corridor – Has the proposal to include Ireland on the Atlantic corridor, due to occur in January 2021, taken effect? This is due to link Ireland’s three core ports of Dublin, Cork, and Shannon-Foynes with two French ports Le Havre and Nantes Saint-Nazaire on the Core Atlantic corridor. Similarly the opportunities of this decision need to be highlighted.

<https://www.gov.ie/en/publication/a09c0f-brexit/>

Specific examples of public transport investment in surface access which will support take-up of connectivity via our ports and airports includes the following:

1. Greater levels of bus transport services serving each of the three airports, Donegal, IWAK and Shannon.
2. Where a service exists bus stops, signage and information should be available including covered bus shelters.
3. An Information app on availability/ timing would be useful. Sometimes it can be difficult to find information about an existing service or predict when it might arrive.
4. Introduce options for car sharing to coincide with flight arrival/departure times.
5. App-enabled on demand services, ride sharing platforms and other such services can be particularly relevant and useful in more regional and rural locations.
6. Regional disparities in public transport + EV infrastructure need to be addressed to encourage modal shift. Introduce a requirement to have a certain proportion of electric vehicles for hire.

Rail Freight

A 2015 by the WDC, *Rail freight and the Western Region*⁶ notes that rail currently moves less than 1% of surface freight across Ireland. Most of this rail freight originates in the Western Region. Rail freight, where available, offers several advantages over road transport. It generates less than a quarter of the emissions of road haulage, removes heavy goods traffic from the roads (each trainload

⁶ <https://westerndevelopment.ie/wp-content/uploads/2020/09/WDC-Rail-Freight-Study-Final-Report-18-12-15.pdf?dl=1>



can remove at least 18 truckloads from the road network) and it can provide an alternative and efficient route to market for business, avoiding congested routes. Rail is particularly suited to high volume freight, carried over relatively long distances and for import/export via the ports. The WDC report identifies traffic that could be transported by rail and notes that Irish Rail plans to increase the rail freight modal share from 1% to 4% within four years. This projected 4% modal share by 2020 would reduce combined emissions from road and rail freight in Ireland by 3% or a reduction of nearly 35,000 tonnes CO₂e. Rail access into ports needs to be safeguarded and enhanced. Dublin and Waterford Ports have played an important role in the recent growth of rail freight. Investment in other ports such as Shannon Foynes and Galway will be needed to reduce potential congestion in Dublin. *Building on Recovery: Infrastructure and Capital Investment 2016-2021* contained a commitment to a feasibility study examining the options for expanding rail freight. This will provide a clear opportunity to focus on the potential nationally and identify the supports needed for expansion. While rail freight will continue to play a relatively small role compared to road, increasing rail freight volumes will capitalise on our existing rail network and will deliver wider societal benefits in terms of lower emissions and reduced traffic on the road network.

How can transport investment help us to transition to a low carbon and climate resilient society in the coming years?

The NIFTI could be more ambitious in relation to climate change, local air pollution and other environmental concerns. All transport infrastructure investment under this framework should be considered in light of carbon emission reduction targets. Transport infrastructure investment should surround a clear picture of how transport would look like to meet the emission reduction targets, and then by working backwards decisions on how best to invest to make that happen can be made. For example, to reduce the carbon intensity of rural travel we need a clear focus on finding solutions. We need to find out what works in rural areas and small towns by piloting infrastructural investments and trying novel approaches to sustainable travel concerning lift sharing, public transport use and active travel so that potential solutions are tested and learned from. While there is a clear need to accelerate place-making and compact development set out in Ireland 2040 we also need to address the existing transport issues for people living in the current settlement pattern.

There is a presumption of an increase in transport demand. Instead, the Avoid-Shift-Improve (ASI) framework should be used to plan reductions in emissions from transport, otherwise, the focus tends to be on improving how we travel (e.g. electric cars rather than diesel or petrol cars), at the expense of avoiding and shifting travel options. While the avoidance of travel, for example by promoting increased remote working or local retail delivery, should be the key focus of policy to reduce carbon intensity, encouraging rural households with more than one car to choose an EV as their second vehicle would also be a useful strategy.

In urban areas, where there is better public transport, encouraging alternative transport modes (including car share) should be explored to encourage single car households (and encourage an increase in the number of households without a car), remote working (from home or from



alternative workplaces such as hubs, which require shorter journeys) reduces the numbers of journeys made quite significantly and has considerable benefits in terms of quality of life as a result of reduced time spent commuting. It also reduces congestion at peak times. The Connected Hubs Project, coordinated by the WDC, will create an interconnected community network of several hundred remote working hubs across Ireland. Using hubs can reduce the distance people need to travel for work. Car sharing may be a useful substitute for owning a second or third vehicle, though access to the car share location may require a journey. Lift sharing is another option reducing the overall number of journeys being made. Developing pilot models for these and examining what works in rural Ireland will be an important step in increasing the use of these options. Given the potential for a slow transition to electric vehicles, and the life expectancy of the current car fleet (to 2030 and beyond), there should be an acceleration of the biofuels obligation scheme with a move to the higher E10 and B12 standards. This should be implemented as soon as feasible it would make a significant difference well before 2030. The potential for even higher blend rates should also be explored. The need for, location of, and best options for developing a comprehensive charging network throughout rural Ireland should be addressed in the EV strategy to be prepared, as outlined in the Programme for Government. This strategy is to ensure that charging infrastructure stays ahead of demand and provide planning guidance to local authorities, so it is important it addresses issues for all parts of Ireland.

Investment needs to address the required future modal shifts, and also different fuel options (especially for freight) ensuring that there is widespread availability of fuels like H₂ and CNG if these are to be used widely especially for freight. Technological advances such as MaaS will also offer opportunities for better integration of modes. There needs to be investment in this technology and the modes it will promote. Collecting real-time data on travel patterns in rural towns and villages is vital to inform policy and solutions. There is scope to work with Future Mobility Campus Ireland in Shannon where the WDC is a project partner, to develop a rural mobility testbed similar to the urban site in Shannon. Of course, the adaptation of the transport network to make it more resilient to the consequences of climate change (severe weather events, flooding, heatwaves) is also an essential area for investment. Funding for mitigation measures such as improved drainage, reinforcing bridges and elevating road and rail lines must be available. Damage to the transport network as well as being costly to repair also have a knock-on effect for a region's economy and accessibility as journeys are disrupted delayed or cancelled. Infrastructure that is already vulnerable (e.g. the Sligo rail line which floods after long periods of heavy rain) should be improved by raising height or using other appropriate technology.

Section 4: Transport Investment

What challenges and opportunities exist with regard to decarbonising the transport sector?

The three-pronged policy approach of 'Avoid, Shift, Improve' (ASI) framework, a hierarchy that emphasises reducing journeys in the first place, achieving modal shift, and improving mode



efficiencies⁷ and should be used for transport planning. Reducing transport demand is a challenge but one that should be at the centre of transport investment and planning. Very often more than one mode of travel is needed to complete a journey in rural areas. It is therefore essential to ensure reliability in transitioning between modes, as any mismatch or delays in one service can lead to very long waiting times for the traveller, or a failure to complete the journey. While Mobility as a Service (MaaS) in its fullest form is not yet available, there are opportunities to develop apps or websites which allow users to plan, book and pay for their travel over multiple modes.

There is potential for innovation in transport infrastructure providing local transport hubs (size and type varying by location) where all transport services for that place (which might be in a town or even just at a crossroads) come together and which provide safe, comfortable waiting areas and may also link to last-mile services such as a shared bike or car share centres or rideshare pick up points, shared taxi or DRT services. The type and size of infrastructure needed would be determined by the type of location but would represent a visible and useful access point for all modes.

Integration, at least to some extent, of the timetables of the different bus operators would be helpful to users who may be connecting across different services. Where a bus service exists, bus stops or covered bus shelters and signage should be available. An Information app on availability/ and real-time arrival should be developed to ensure that real-time data is available on rural transport. This is essential to encouraging greater public transport use and there is a greater need in rural areas where public transport is less frequent. The opportunity to make the school bus services and other transport services for rural people available, where suitable, to all rural dwellers, should be explored to get the best possible value for these services.

Normalising walking and cycling as viable travel options in rural areas is essential. They shouldn't be considered unusual, risky or the preserve of a small minority. This normalisation should occur as participation increases and as the infrastructure for active travel is improved and the options are more visible and safer. While in many situations rural people have no option but to drive to their local town, there should be an effort to encourage walking between shops or services within the town, leaving the car parked in one spot for the duration of the visit. Any planning for new retail or other services should require good access for walking and cycling. Safe covered places to park bicycles should be available at a number of points in a town (or at a transport hub). Increasing uptake of e-bikes (and e-bike shares) should also form a part of improving sustainable mobility in rural areas. They connect people to other modes or make slightly longer journeys (to work or for other services) easier and can be a useful last-mile option.

The need for, location of, and best options for developing a comprehensive charging network throughout rural Ireland should be addressed in the EV strategy as committed to in the Programme for Government. This strategy is to ensure that charging infrastructure stays ahead of demand and provide planning guidance to local authorities, so it is important it addresses issues for all parts of Ireland. In some rural areas, there may initially be less demand for infrastructure such as that for

⁷ See more discussion in the NESC paper [Advancing the Low-Carbon Transition in Irish Transport](#)



charging EVs. This infrastructure investment needs to be early and widespread. This will not just benefit those living in rural areas but will be important for those visiting for business or pleasure. Lack of charging points could in future become a disincentive for visitors and could further concentrate tourism and other economic activities in areas near larger urban centres. Similarly, services such as alternative fuelling points (CNG or H₂) must be made available for HGVs and buses or is this the case a lack of refuelling options could increase costs of delivery or services in more rural and peripheral regions or reduce the options available.

Investment needs to address the required future modal shifts, and also different fuel options (especially for freight) ensuring that there is widespread availability of fuels like H₂ and CNG if these are to be used widely especially for freight. Alternative more sustainable modes should be incentivised, for example promoting rail freight, discussed earlier. Technological advances such as MaaS will also offer opportunities for better integration of modes. There needs to be investment in this technology and the modes it will promote.

What challenges and opportunities exist with regard to protecting and renewing the existing transport network?

Background paper 6 notes that land transport received a capital allocation of €1.8bn in 2020 and that €1.3bn (over 70% of the total) would be needed, annually, merely to maintain the existing infrastructure. Furthermore, the €1.3bn is estimated under the assumption that *“the transport network currently exists in an adequately maintained state”* and that over 400m in additional funding, inclusive of 100m in funding by the Local Authorities, remains available for protection and renewal. Any reductions in expenditure from these alternative sources would merely shift the burden back to the Department.

The WDC notes that the levels of expenditure required for adequate maintenance of the road network, as a share of the current capital allocation, leaves little room for the extension of the network over the lifecycle of the NDP. If the vision of Project Ireland 2040 is to be met regional connectivity must be prioritised thus the WDC argues that, in this context, the choice of transport projects and timing of these projects may need to be rebalanced to promote regional development. Projects within the Atlantic Economic Corridor are seen as key in delivering the Project Ireland objective of Enhanced Regional Accessibility and need to be accelerated. The lack of high-quality connectivity between the regions within the AEC has been a major impediment to its development as a counter-balance to Dublin and the East coast. The improvement of regional connectivity along the Western seaboard, linking together the major urban areas to allow the AEC to achieve its potential, is a major priority. (NPF. 2018, p.41). The NDP commitment to maintaining current journey times is welcome but, in many cases, needs to be improved.

The WDC agrees that the prioritisation of maintenance should be *“based on targeted outcomes or objectives, rather than on existing administrative structures”* as noted in Background paper 7. Background paper 7 further notes that *“investment proposals should, in the first instance,*



align with broader strategic policy goals” and the WDC notes that, in this context, the vision of Project Ireland 2040 surrounds balanced regional development. The WDC agrees that investment decision should also support objectives related to economic growth, productivity, international competitiveness, social equity through access and mobility, environmental concerns and wider impacts of infrastructure. The WDC argued in its recent submission to the Review to Renew consultation that capital investment needs to be prioritised to key regional projects that will drive regional employment and enterprise growth, which in turn will drive population growth as envisioned by Project Ireland 2040, see [here](#). The WDC argued that infrastructure development should focus on the most efficient investments to deliver 1) economic growth and 2) long-term societal issues such as environmental quality, climate and housing.

The WDC welcomes the discussion around the importance of lifeline roads in Background paper 12, in many cases, it will be appropriate that ‘lifeline’ roads be prioritised for maintenance, particularly in the absence of any alternative route development. Measurable access to the urban centres of scale (with target timelines) could also be used here.

The WDC notes that is important that considerations for future-proofing the road network is an important challenge but represents an important opportunity. As noted in Background paper 6, historic underinvestment in maintenance has come at the expense of increased overall costs over the longer term, the same logic can be applied to a scenario where old technology becomes embedded into the system. Connected and Autonomous Vehicles (CAV) technology should be an important part of maintaining the existing network, any upgrades on routes should incorporate space for CAV tech into the design (roadside beacons, cables etc).

What challenges and opportunities exist concerning improving mobility for people and goods in urban areas?

Section 4.2.3 of the draft NIFTI notes that the NPF objective of compact growth and improvements in sustainable mobility *“are not confined to the five cities”* but the WDC argues that mobility issues for rural as well as urban dwellers outside of the five cities are also important. The focus of infrastructure delivery should be on increasing walking and cycling not just in urban or congested areas but in rural and smaller or less congested urban areas.

In rural areas where roads are narrow and road surfaces can poor, walking and cycling can be unattractive options and thus impact the current patterns of transport. The lack of public transport options will also clearly reduce the use of public transport by rural and urban dwellers. If there were more accessible public transport infrastructure in place the means of travel to work, by alternative options, is likely to be higher than observed in Figure 4.1 in Background paper 12. A recent study, [Carroll et al. \(2021\)](#) notes that there is a high degree of *“forced car ownership”* a reliance on the private car may often reflect the lack of alternative rather than a preference for rural dwellers. Infrastructure improvements can help alternative modes of transport become part of the package of travel options for people making a journey to work, school or to services. Normalising walking and cycling as viable travel options in rural areas is important. They shouldn’t be considered unusual,



risky or the preserve of a small minority. This normalisation will of course occur as participation increases, but also as the infrastructure is increased and the options are more visible and safer. Some of the design of roads and crossings in towns (including smaller rural towns) mitigates against walking, with poor junction design making it hard to cross the road. Similarly, shopping facilities usually prioritise car routes and do not provide short direct options for walkers.

In rural areas, the number of people who walk or cycle to public transport (bus or train) should be targeted for increase. The provision of adequate infrastructure is vital to achieving this. There are several sensible options to be considered in this regard. For example, footpaths around train stations, linking towns to train stations, safe places to wait in the vicinity of bus connection options or stopping places. The provision of physical infrastructure such as bus shelters with accurate information would also serve to increase the visibility of the provision of public transport in the area. Rural bus shelters are visible in many parts of Europe (they are usually of different design to urban shelters) providing shelter and a place to sit while waiting. There is an urgent need to provide new interchange facilities and enhanced bus waiting facilities together with enhanced passenger information, utilising smart technology in appropriate circumstances. Even relatively small investments in smaller centres are needed and if made can help support increased patronage levels. For example, given the many interconnections at Charlestown (e.g. Bus 22 Dublin-Ballina and Bus 64 Derry-Galway), a bus shelter should be considered. Several other options for sustainable mobility are discussed in the WDC Submission to the Public Consultation on a Review of Sustainable Mobility Policy, see [here](#).

What challenges and opportunities exist with regard to enhancing regional and rural connectivity, including to our ports and airports?

The development of regional growth centres as planned under Project Ireland 2040 will require investment in accessible, efficient links to airport and port infrastructure as well as to other important centres. The challenges associated with enhancing connectivity including to our ports and airports include long timelines and the need to prioritise effectively. As with much infrastructure investment, many transport projects take a long time and significant projects can take decades. This requires long-term commitment and all-party support given the shorter political cycles. While it is a priority to protect and renew the existing network, it is also important to frontload the improvements in the network to enhance regional accessibility as soon as possible to support the change in regional balance outlined in NPF goals. In terms of promoting Project Ireland 2040 goals, Brexit and TENs could provide an opportunity to rebalance the relative importance of some ports.

Brexit

Much of our international connectivity was predicated on access via the UK, availing of international air connections via Heathrow and other UK hubs, while the UK landbridge is a very important part of sea access to Europe and beyond. Brexit and the Covid-19 pandemic have separately impacted on international sea and air transport. Aviation has been severely impacted by the pandemic but is expected to return to some degree of normality as restrictions on international travel lift. However,



the impacts on regional airports and their international routes may be slowest to recover and ongoing support will be needed to ensure these routes recover. As noted previously, direct international access into the regions is really important in the context of regional growth generally and Project Ireland 2040 employment and population targets. Brexit has had a greater impact on traffic from and to Irish ports and the UK landbridge became a much less attractive route to continental Europe. This had significant impacts on port traffic highlighting the value and importance of ports across the regions, particularly Rosslare, Cork and Waterford.

Both Cork and Rosslare have increased direct freight services to Europe as an alternative to the UK landbridge, with significant growth at Rosslare⁸ (though Rosslare was not even referred to in the Background paper 4). Separately Waterford Port has expanded its rail freight offering with a new twice-weekly rail freight service in each direction between Ballina, County Mayo and Waterford Port. As well as an alternative transport mode for business in the north-west, this has potential for over 5,000 truck movements a year to switch from road to rail, with a resulting reduction in road congestion, and 75% reduction in emissions per unit. The development of these ports highlights their potential to promote regional growth. The development of these routes also highlights their geographic benefit to parts of the western seaboard in accessing European markets. Brexit also highlights the relative peripherality of the North West. There is a need to progress the N2-A5 linking Letterkenny to Dublin and the general road infrastructure in the North West and Border region.

Trans-European Transport Network- Core network

The discussion on the Trans-European Transport Network in Background paper 4 is useful in highlighting potential opportunity to improve connectivity to Europe. However, it is not entirely clear on a couple of points.

- North Sea-Mediterranean: There had been an understanding that there was a spur to Shannon/Foynes Port/Limerick, though this is not displayed on the map of the Current Ten-T core network.
- Atlantic corridor: Has the proposal to include Ireland on the Atlantic corridor, due to occur in January 2021, taken effect? This is due to link Ireland's three core ports of Dublin, Cork, and Shannon-Foynes with two French ports Le Havre and Nantes Saint-Nazaire on the Core Atlantic corridor. Similarly, the opportunities of this decision need to be highlighted.⁹

Do the four NIFTI investment priorities help to deliver the National Strategic Outcomes? Should anything change about them?

The National Development Plan (NDP) remains the key mechanism through which the objectives of Project Ireland 2040, including the ambition to achieve 75% population growth in the regions, can be achieved. The NPF notes the *"need to manage more balanced growth between these three regions*

⁸ <https://www.irishtimes.com/business/brexit-delivers-record-freight-for-rosslare-on-ferries-to-mainland-eu-1.4472331>

⁹ <https://www.gov.ie/en/publication/a09c0f-brexit/>



because at the moment Dublin, and to a lesser extent the wider Eastern and Midland area, has witnessed an overconcentration of population, homes and jobs. We cannot let this continue unchecked and so our aim is to see a roughly 50:50 distribution of growth between the Eastern and Midland region, and the Southern and Northern and Western regions, with 75% of the growth to be outside of Dublin and its suburbs” (Sec 1.2, NPF).

Investment decisions in transport must focus on areas that will positively contribute to achieving this objective. To this end, key regional projects that will drive regional employment and enterprise growth, which in turn will drive population growth, must be prioritised. The WDC’s recent submission on the Review to Renew consultation outlines several key transport projects, see [here](#). Public investments of a ‘national’ nature which are mainly located in the Capital contribute strongly to its economic growth and primacy. The WDC considers current settlement patterns may be, at least in part, be attributed to historical under-investment in regional infrastructure. Public transport investment can either reinforce the ‘business as usual’ scenario or be used as a tool to achieve the priorities of the NPF for more effective regional development.

The WDC cautions that there is a risk that the NIFTI priorities may misalign with the overarching vision of Project Ireland 2040 that surrounds balanced regional development and a move away from business as usual. The NIFTI priorities potentially risk placing regional development issues as a distinct priority under the stand-alone priority of “*Enhanced Regional and Rural Connectivity.*” The WDC argues that regional and rural connectivity, rather than a distinct priority, should be considered a cross-cutting principle for all transport investment decisions. Rather than be considered separately, balanced regional development facilitated through the enhancement of regional and rural accessibility should be a key concern within each NIFTI priority to deliver on the vision of Project Ireland 2040. To make infrastructure investments according to the priorities in the absence of the consideration of balanced regional development is likely to contribute to a widening of the gap between the regions which would be in direct conflict with the vision of the NPF.

The WDC is pleased to make this submission to the Consultation on the Draft National Investment Framework for Transport in Ireland (NIFTI). If there are any queries concerning this submission, please contact me.

Yours sincerely,

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