

Department of Transport,
2 Leeson Street Lane,
Dublin.

[Sent by email: transport2040@transport.gov.ie]

Re: Submission to National Investment Framework for Transport in Ireland (NIFTI)

28th May 2021

A Chara,

The Irish Planning Institute (IPI) welcomes and supports the introduction of the National Investment Framework for Transport in Ireland (NIFTI) to underpin the delivery and achievement of the spatial objectives and National Strategic Outcomes set out in the National Planning Framework (NPF) and National Development Plan. The IPI is the largest professional membership body for spatial planners operating on the island of Ireland. Some 900 IPI Members work right across the planning system – in planning consultancies, for developers, in Planning Authorities, semi-state organisations, An Bord Pleanála, and Central Government. The IPI believes that public transport and active travel infrastructure needs to be significantly increased to mitigate climate change, provide extensive mobility for all and to support a dynamic, innovative economy. Our submission will cover key areas for consideration below.

Reinforce Integration of Land Use Planning & Transport Planning

Movement patterns derive from how our cities, towns, neighbourhoods and villages function and how they are planned. Transport projects are generated from the need to support planning strategies to facilitate improved movement between where people live, work and recreate. Therefore, it is important that planning and transport is inherently linked and mutually reinforced at all levels, from National to Regional to Local level. The Framework must recognise that public transport and active travel investment will drive land use development in appropriate locations. In section 5.7, there is a commitment to identify the housing potential associated with planned or proposed transport infrastructure in our urban centres. This commitment should be advanced at the early stage of developing transport projects in the context of planning strategies at National, Regional and Local level. Sustainable, Transport-oriented Planning and Development is key and should be applied to future development to develop a symbiotic relationship between dense, compact urban form and public transport existing and planned.

Planning Input must Underpin all Project Stages

The IPI welcomes the NIFTI's requirement for Strategic Planning Assessments at the early project stage. However, planning input should not be confined to one part of the process and instead should underpin all stages; how projects are prioritised, developed and designed, communicated and

approved. This is in recognition that all transport projects are or should be generated from underpinning planning strategies. Planners have a crucial role to play not only in strategy development but also in implementation.

It is recommended that the Framework reinforces the intrinsic link between planning and transportation by requiring planning input at all stages and at all decision-making levels. The role of Regional Spatial and Economic Strategies, Metropolitan Area Strategic Plans, City/County Development Plans, Local Area Plans, Strategic Development Zones and the development management process in delivering active travel should be explicitly recognised.

Multi-Disciplinary Approach

A multi-disciplinary approach is required, with planners playing a key role, thereby linking project delivery to strategy. Where resource requirements are being reviewed, multi-disciplinary inputs including planners, should be considered by the Public Agencies.

Planners' involvement is needed at all levels, from strategic and settlement planning, to the design of local street networks and public spaces in urban centres. Furthermore, planners in Local Authorities can play a key role in coordinating placemaking in transport planning projects to enrich the social, economic and physical fabric of villages, towns and cities.

Governance Structures

Collaboration and coordination between all stakeholders will be key. The Framework should consider the governance structures in transport planning, including the roles of the National Transport Authority, Transport Infrastructure Ireland and Local Authorities. Therefore, NIFTI should recognise how these roles will contribute to the delivery of the Framework's priorities. In addition, NIFTI should reference and bring forward Objective 69 of the NPF to extend the NTA's statutory role in land use and transport integration to the cities of Cork, Limerick, Galway and Waterford. Local Authorities should play an equal and active role in planning for and delivering Metropolitan Area Transport Strategies. The framework should recognise the need for the Metropolitan Area Transport Strategies in the regional cities to be placed on a statutory footing. These should be aligned with the Metropolitan Area Strategic Plans.

Modal Hierarchy and Intervention Hierarchy

The IPI welcomes the modal hierarchy in the framework, and this hierarchy should be reflected in investment priorities. However, the modal hierarchy must acknowledge that there is a hierarchy within active travel. For example, where there is competition for space, the pedestrian and pedestrian space should always be prioritised over other modes.

The intervention hierarchy needs to be aligned and integrated with delivering the investment priorities and modal hierarchy. The IPI understands that some Local Authorities can only afford to maintain one per cent of their network. This infrastructure is already in place, and with regular maintenance, particularly for footpaths and cycle lanes, this will greatly improve the network in towns and cities. Maintenance funding should also extend to other elements, such as public lighting within the public realm. In terms of optimisation where existing infrastructure exists, clarity regarding capacity will be important to decide the appropriate scales for development. The framework should also clarify how new projects will be delivered in a timely manner.

Public Transport Infrastructure Investment

A significant acceleration in investment is needed in major new public transport projects in urban areas if compact growth and modal shift is to be achieved. This should be reinforced by the NDP (Review), and it should be soundly grounded in Project Ireland 2040.

In this regard, a significant share of total funding will be required to accelerate sustainable transport projects across the five NPF cities of Dublin, Cork, Limerick, Galway and Waterford to deliver increased capacity and enable high quality and high frequency public transport.

In addition to public transport infrastructure investment, there is a need to review the ‘first mile’ and ‘last mile’ before and after public transport use to encourage a modal shift. Through spatial planning, there is an opportunity to provide multi-modal transport solutions by planning and investing in good interchange facilities.

What constitutes a Project

Equally important to large scale transport projects is the need for investment in walking and cycling infrastructure, awareness campaigns and behaviour change programmes that can deliver lower cost, high value dividends for health, society, the environment and economy. In addition, investment should be provided to Local Authorities to undertake studies and collaborate with academia and other research bodies to inform policies and projects to ensure an evidence-based approach is deployed. The framework should explore potential opportunities for improved public transport services and pilots of new transport initiatives in rural areas, villages and small towns. The framework should also focus on engagement and collaboration in projects. This is vital to the success of all transport projects – large or small.

Active Travel

Local area planning coupled with active mobility planning is important for promoting active travel. Local Authorities will play a key role in the delivery of integrated walking and cycling networks in every town and city in Ireland. The IPI believes that there should be a greater focus on retrofitting the existing urban environment to enhance connectivity and permeability. Well designed, accessible streets will encourage more people to walk and cycle, which can also provide economic and social benefits. The pandemic has generated an increase in local trips, but the challenge will be to keep this momentum going to ensure more local living is active travel based and not car based. The Institute recognises the vital role of the Urban Regeneration Development Funds and Rural Regeneration Development Funds have to link regeneration and mobility. However, additional funding is required for Local Authorities to deliver transformational placemaking and public realm improvements.

Sustainable Urban Freight Measures

The NIFTI should consider freight and servicing which is essential for day to day functioning of cities, towns and urban villages, for businesses and residents. While it is important to ensure that the freight industry maintains its quality of service, it is also equally important to ensure that the negative implications of freight movement on the environment and on local communities is minimised. Therefore, the IPI believes further consideration is required in the Framework for sustainable urban freight measures to allow for greater environmental and liveability improvements.

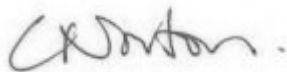
Urban Traffic Management

Within urban areas, the IPI strongly advocates for reduced traffic speeds. The relationship between speed and injury severity is particularly critical for vulnerable road users such as pedestrians and cyclists. Excess speeds promote congestion, correlated to a hostile environment for communities, particularly children and older people and mitigates against the choice of walking and cycling as a preferred mode. High speeds in urban environments restrict the full use and enjoyment of streets and spaces as places and damage the prospects for urban regeneration of town centres as liveable mixed-use communities.

Appropriate speed levels can be imposed by developing a safer infrastructure. This can involve the retrofit of streets and spaces and also the reallocation of road space. The Framework should allocate investment for changes in regulations and the redesign of our urban environment to enable pedestrians and cyclists of all ages to use roads and streets safely.

The Irish Planning Institute appreciates the opportunity to give its views on the public consultation on the National Investment Framework for Transport in Ireland. If the Institute can be of any further assistance to this important initiative, please do not hesitate to contact us.

Yours sincerely,



Dr Conor Norton MIPI

President 2020 - 2021

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