

# **SUBMISSION BY THE CHARTERED INSTITUTE OF LOGISTICS AND TRANSPORT IN RESPONSE TO THE CONSULTATION ON THE DRAFT MID WEST AREA STRATEGIC PLAN**

## **Introduction**

The Chartered Institute of Logistics and Transport (CILT) is the professional body representing people working in logistics and all modes of transport. It currently has a membership of almost 1,000 logistics and transport professionals in Ireland and over 30,000 worldwide. The Institute's qualifications are recognised internationally as evidence of a high level of professional competence in the sector. The Institute is an independent body which does not lobby on behalf of any individual or group. Instead it strives to take a considered and objective view of matters affecting the logistics and transport sector and seeks to influence developments affecting that sector in a way that is likely to benefit society as a whole.

The Institute welcomes the opportunity to comment on the draft Mid West Area Strategic Plan (MWASP). The preparation of a strategic plan for the region is most welcome and long overdue.

## **Strategic Comments**

For many years the Mid West region was to the forefront of regional planning in Ireland and was responsible for a lot of innovative, far sighted and creative work. The development of MWASP provides a real opportunity to regain that leadership role in regional planning. The current draft requires significant work before it can aspire to that objective. The comments which the Institute offers below are intended to be helpful in achieving that objective.

The current draft of MWASP contains a wealth of helpful data and useful analysis which should be built on to provide a much clearer and engaging vision for the future development of the region. The final MWASP adopted by the Regional Authority needs to better capture the imagination of the potential investor considering the establishment of a new enterprise and the creation of new jobs in the region. It also needs to provide a more convincing basis to encourage Government to invest in the region, particularly in transport infrastructure and services.

The Institute supports the objectives of strengthening Limerick as the core of the region and the strengthening of the Limerick/Shannon Gateway and Ennis Hub in terms of population and employment growth. It welcomes the population targets set out in Table 5.1 which would see the population of Limerick/Shannon/Ennis grow from 34% of the regional total in 2006 to over 38% in 2030. It is a cause of some

concern, however, that the draft MWASP does not set out sufficiently clearly how these targets will be achieved. There is a concern that these targets may be just aspirational and that there appear to be few operational strategies and measures in the draft which give reasonable assurance that they can be achieved.

Before finalising the Plan it might be prudent to await more detailed results from Census 2011, due in the Spring, to assess whether the distribution of population growth since 2006 has been in line with the proposed targets or not. If the trend is not favourable, it may necessitate some reconsideration of the proposed approach. The draft Plan identifies a number of development clusters for the Limerick Metropolitan Area and goes on to state that local area plans should be prepared for each cluster to assess their potential to provide employment and residential uses. This seems to raise a doubt about the capacity of these areas to meet the population targets. It is not clear if the study team carried out a preliminary analysis of the capacity of each area to absorb the population targeted for it and this might be addressed in the final document.

Robust arrangements should be put in place to monitor population trends in the region, both total growth and the location of that growth. If growth does not occur in line with the forecasts, it should not be assumed that this is just a matter of timing and that it will eventually occur on the scale and in the locations forecast. It will be important to carefully analyse the reasons for any material departure from the Plan and to adjust the development strategy accordingly. Otherwise there is a real risk that the objectives of the Plan could be fatally undermined.

The Institute strongly supports the statement in the draft (Section 3.1.4) that the continuation of an overly dispersed settlement pattern in the Mid West will undermine the achievement of the settlement targets in the Regional Planning Guidelines and MWASP. This deserves repetition and greater emphasis throughout the Plan, as does the related point that dispersed settlement will also undermine the case for increased investment in public and sustainable transport.

There needs to be a much clearer articulation of the interaction between the land use and transportation strategies proposed in the draft. It is not sufficiently clear how the transportation strategy is integrated with the land use objectives or how the land use strategy will support the development of a more sustainable transport system. For example, is it proposed that residential development in the major urban areas of the region should be concentrated on public transport corridors? Are higher development densities proposed for areas close to public transport? Is there a need for more detailed guidance as to the content of future development plans to facilitate the implementation of the proposed strategy?

Sustainable Urban Mobility Plans should be drawn up for the main urban centres. These Plans are being promoted by the European Commission and the European

Parliament as a way to better fulfil the aims and objectives of the EU Action Plan on Urban Mobility. They involve an integrated planning process, address all forms and modes of transport in an urban area and its environs and are intended to foster a planning culture and practice that aims at truly sustainable urban transport development. They define a set of interrelated measures designed to satisfy the mobility needs of people and businesses of today and tomorrow.

Consideration should be given to strengthening the Transportation Strategy (Section 5.4). The most fundamental problem is that the text is not sufficiently clear as to the status of the excellent work contained in the Public Transport Feasibility Study. Rather than mainly recount what was done in the Feasibility Study, Section 5.4 should clearly set out the recommended public and sustainable transport strategy derived from that work, assuming that is the intention. The only clue at present as to the status of Appendix C is an obtuse reference at the beginning of Section 5.4.3.

The two sub-sections on roads are disappointing and seem to assume that road investment is a self-evident good. There are two long lists of proposed road developments/improvements but there is an inadequate explanation of how these investments support the implementation of the overall MWASP strategy. Unlike the public transport strategy set out in Appendix C, there is no attempt to prioritise the proposed road investments from a regional development perspective. The risk, therefore, is that these unsupported and unprioritised proposals will simply be dismissed by Government when considering how to allocate very scarce funding.

Given the scarcity of public funding for a substantial period ahead, first priority needs to be given to protecting the existing transport system and maximising its value. The existing road and public transport infrastructure needs to be adequately maintained and renewed on a timely basis. Bus and rail fleets have to be replaced at the end of their useful life. None of these should be taken as a given in the current very difficult economic climate and the Institute therefore recommends that Section 5.4 address this issue in a substantive way. The Section should place a more explicit emphasis on ways to sweat existing assets to the maximum extent possible before seeking funding for new investment. Are the region's roads, particularly in urban areas, being used as efficiently as possible? Is there scope for more effective use of information technology to increase use and capacity? Is there a better way to deliver public transport services in rural areas? How can traffic on lightly used rail lines be developed? These issues are touched on in the draft but should be strengthened and emphasised. If the region proves that it has a strategy to make the best possible use of its existing infrastructure, it will strengthen its case for funding and for new investment.

There appears to be a very significant frontloading in capital expenditure in the first five years of the preferred public transport and sustainable transport investment strategy. Is this feasible given the significant reductions in capital expenditure for the period 2012-2016 announced late last year in the Comprehensive Expenditure

Review? A number of the measures also have a requirement for ongoing revenue support which should be quantified and included in the Preferred Strategy.

More detailed consideration might be given to the possibility of generating additional funding for transport investment in the region itself, rather than simply dismissing this as politically too difficult or a matter for national Government. If the region was itself willing to consider some, even difficult, funding options this would strengthen its case for central Government support.

## Detailed Comments

The following are some more detailed comments on aspects of the draft MWASP:

**Executive Summary:** The Executive Summary is too short and fails to convey the substance of the proposed development strategy for the Mid West. It needs to engage the reader and encourage him or her to delve into the detail.

**Chapter 2:** Some of the data in this Chapter and elsewhere in the draft is out of date and should be updated as far as possible. For example the Shannon Airport traffic figures for 2011 are now available. Are more up to date employment statistics available?

There appears to be some confusion as to what the Plan wants to say about the Limerick-Ballybrophy rail line. In Chapters 2 and 7 it talks about possibly redirecting some Limerick-Dublin services to this line, whereas Appendix C suggests reviewing the possibility of converting it to tram/train operations. The relevant text should be reviewed in the light of the service changes introduced on 5 March and the options discussed in Rail Vision 2030, recently published by Iarnrod Eireann. MWASP should clearly demonstrate how its land use strategy would sustain a case for the retention and development of services on this line. An alternative funding model for the retention of services on this line might also be considered, based for example on the Community Railways and Community Rail Partnerships in the Britain and similar models in other countries such as Germany.

There are references in Chapter 2 and elsewhere in the draft to the future provision of high speed rail services between the principal cities. What is meant by high speed in this context? The UK Government recently decided to proceed with the development of a new high speed line between London and the West Midlands at a capital cost (excluding rolling stock) of STG£18.6 billion. This is roughly the same distance as Limerick to Dublin and the estimated cost exceeds the total cost of developing Ireland's motorway network. Is this realistic in even the longer term and has Ireland the population base and distribution to support such investment? The region might instead consider supporting a rail development strategy which aims to reduce journey times on the existing rail network. Iarnrod Eireann recently published Rail Vision 2030 which demonstrates that investment to provide alternate direct and

indirect services on the Limerick-Dublin route, coupled with a 2 hour journey time, would generate a substantial economic return. This, allied with retention of an hourly frequency, would make the rail service more attractive and competitive with road travel.

Consideration could also be given to reducing journey times between Limerick and Cork/Waterford through infrastructural investment and possible better timetable integration, through for example shorter layovers at Limerick Junction.

**Chapter 3:** Section 3.1.2 on the National Development Plan is badly out of date and fails to reflect that it has been succeeded by the National Recovery Plan (2010) and the Comprehensive Expenditure Review (2011) which involve very severe reductions in Exchequer capital expenditure in the period to end 2016 over what was originally planned. Has the study team considered the implications of these reductions for the content and timing of the MWASP investment proposals?

**Chapter 5:** This Chapter contains some laudable settlement policy objectives, such as integrating the location of key land uses with the highest level of access by public transport, cycling and walking, the promotion of key infrastructural investments in locations that can successfully accommodate significant development and so on. It would be helpful if the Plan made a stronger case for specific investment proposals by showing more clearly how they would contribute to the achievement of these policy objectives. It would also greatly strengthen the Plan if it made more explicit recommendations as to how local authority development plans should be amended to achieve these objectives.

The statement on page 68 that Newcastlewest should be planned to operate in tandem with Rathkeale and Abbeyfeale warrants some explanation.

The Institute supports the key policy objectives set out under headings 1-8 in Section 5.3.2. However some warrant further development in the supporting narrative and elsewhere in the Plan, as appropriate. For example, under heading 1 there is a reference to the need for a distinct unified vision for the region and for a willingness to ensure alignment of all local authority policies with the single vision. Are these matters addressed as fully as possible in the Plan itself? The strategic basis for a cohesive approach to improving infrastructure could be articulated more effectively under heading 4 as the existing reference to other reports and a list of projects is not convincing. The reference under heading 5 to Shannon Airport suffers from a similar problem.

MWASP should be used to give better emphasis to the strategic role of both Shannon Airport and the Estuary port and the final text should set out much more clearly how the region wishes to see these facilities developed.

The references to the Limerick Regeneration Plan on page 74 should be updated. There is a reference to a rail link to Shannon Airport on page 75 which seems inconsistent with the conclusions of the Public Transport Feasibility Study.

The objectives in Section 5.4.1 might be more clearly expressed. For example what is meant by “international links and competitive location”? Infrastructure should support economic development not just industry.

There are repeated references to the proposed M21 between Adare and Abbeyfeale. The M-designation suggests a motorway? Is this correct and if so is it now warranted? The case for revisiting this project needs to be more clearly articulated on page 83. In our view town bypasses coupled with targeted improvements to enhance the capacity and safety of the road will be sufficient for this corridor.

There is a reference on page 84 to some links and bypasses being progressed through private financing. What form (development levies, tolls) and to what extent (will they still require substantial public funding)?

The heading of Section 6.1 might be changed to “Assumptions” rather than “Targets” as better describing its content.

In Section 6.2.1.1 the reasons for the greater growth in passenger numbers warrants comment, particularly as it seems to be represented as a positive trend. For example, if the cause of this was ever longer commuting journeys due to a movement of population to more peripheral areas in the region this would be a cause for concern.

As mentioned earlier, consideration should be given to the need for more specific and detailed development control recommendations in Section 6.3.

The recommendation on page 100 that the MWASP Steering Committee meet in September to process applications for Government financial assistance would seem to be too late in the year to influence the revised Estimates process.

**Appendices A and B:** Perhaps these should be merged and described as the Preferred Public and Sustainable Transport Strategy.

**Appendix C Public Transport Feasibility Study:** The Executive Summary would benefit from some further development to give the casual reader a clearer picture of its conclusions and recommendations.

While we do not necessarily disagree with the conclusion, the analysis of light rail in Section 3.2 seems very perfunctory. It would benefit from some demand analysis and should include an Irish perspective based on experience with Luas. Why is UK cost data used instead of Irish data? There is no evidence of consultation with the Railway Procurement Agency. The descriptions of the Luas lines contain errors.

On page 20, an indicative cost per park+ride space would be helpful, possibly guided by work done by the former Dublin Transportation Office.

The Institute supports the proposals for the development of local bus services in Limerick, including the simplification of the network, the intensification of services on a cost effective basis, the provision of park+ride and the improvement of travel information. We also stress the importance of better integration of rail services with the local bus network.

The Institute will publish a policy statement in the near future which supports the development of better bus priority, including BRT, and recommends the early implementation of one or more demonstration projects to test the concept in an Irish context. We therefore support the proposals for three BRT corridors in the Study, although another term should be used because what is proposed does not accord with what is usually understood to be BRT. The proposals would benefit from some further elaboration, particularly some demand analysis and a more explicit explanation of how they would support the wider MWASP development strategy in the areas served. The implementation of effective bus priority measures should be a precondition for the enhancement of bus services and the provision of Exchequer funding for such services should be conditional on satisfactory progress on the implementation of bus priority.

In summary, the Institute believes that the future development of Limerick and its environs should be designed around the bus as the mode of choice, accounting for a significantly larger proportion of total transport journeys. To achieve this, a dedicated team drawn from the relevant agencies, and with an explicit mandate and clear targets, should be put together to develop the plans and deliver on the ground.

Section 3.12 would benefit from much more specific guidance on the content of necessary supportive land use policies.

In Section 5, there appears to have been no modelling of the Preferred Strategy as distinct from Scenarios 2 and 3. The investment packages in Scenarios 2 and 3 seem to deliver quite modest absolute increases in public transport passenger numbers and modal share. This modest impact from investment suggests that some further consideration should be given to push/pull measures to encourage increased use, notwithstanding their somewhat cursory dismissal in the draft Plan. The timing of investments might also be reconsidered in this light and also because of the likely continuing constraints in public expenditure in the medium term. Another factor that needs to be taken into account is the significant recurring cost of many of the measures proposed in the Preferred Strategy.

As regards specific proposals, it is not clear what the value of a rail/air shuttle from Sixmilebridge would be. It would not appear, for example, to deliver competitive journey times when compared with bus services between Limerick and the Airport.

The proposal to provide free services on the Limerick-Ballybrophy rail line would seem to be a questionable use of very scarce and declining PSO funding. It is also arguable that if €3.1 million was available for use in that area it would be better used to renew the line or improve commuter bus services on the Roscrea/Nenagh/Limerick corridor. A similar point can be made about €24.6 million for free bus services over a year in Limerick. Surely it is possible to think of much less costly ways to promote increased usage and better ways to use this funding, in the unlikely event that it was available?