

SUBMISSION FROM THE CHARTERED INSTITUTE OF LOGISTICS AND TRANSPORT IN IRELAND TO THE NATIONAL ROAD AUTHORITY'S PUBLIC CONSULTATION IN RESPECT OF THE DRAFT POLICY ON SERVICE AREAS ON NATIONAL ROADS

Introduction

The Chartered Institute of Logistics and Transport in Ireland ("the Institute") is the independent professional body for people engaged in logistics and all modes of transport. The Institute is part of an international body with 30,000 members worldwide. As a professional body, the Institute does not lobby on behalf of any sectoral interest, but seeks to take an independent, objective and considered view on matters of public policy.

The Institute welcomes the opportunity to respond to the public consultation in respect of the draft policy on service areas on national roads.

General Response

The Institute welcomes the publication of the draft policy and broadly supports it. The submission makes a number of suggestions which it considers will improve and elaborate on the policy proposals set out in the draft. The suggestions are made in the same order as the issues arise in the text.

Provision of Service Areas on the Single Carriageway Network

Paragraph 1.4 of the draft policy states that the NRA "has no plans currently to provide service areas on single carriageway roads" and that "the needs of road users along these routes are met by local services in towns and villages". The Institute considers this approach to be too laissez faire and recommends that the NRA carries out an audit of key strategic single carriageway routes to satisfy itself as to the adequacy of service provision. While it is likely that there is adequate access to services such as fuel and food, the position relating to parking and rest areas is less certain, particularly for large commercial vehicles. The draft policy quite rightly places a lot of emphasis on the importance of safety in determining service areas policy and adequate rest is an essential element, particularly for drivers of large commercial vehicles.

The focus of the audit should be on the single carriageway routes in the TENS-T network in Ireland, on other national primary routes and on strategic national secondary routes such as the N52 and N80. Some areas of the country are far

removed from the motorway network and drivers face long journeys before they access the motorway network or after they leave it. Prime examples include Donegal and south and west Kerry.

Type, Standards and Spacing of Service Areas

The Institute broadly supports the proposals in the draft policy with regard to the type, standards and spacing of service areas but makes the following suggestions for improvements.

Section 4.1 states that Type 2 service areas (which will only provide parking, picnic and toilet facilities) will only service one side of a motorway or dual carriageway. While we can accept that the physical facilities might be located on only one side of a motorway or dual carriageway, does this mean that they will not be accessible from the other side? The policy statement in this paragraph should be clarified. If Type 2 service areas are not accessible from both carriageways it will bring into question the adequacy of the overall coverage proposed, particularly in respect of parking and rest facilities for commercial vehicles.

The Institute would welcome a fuller statement in this section of the draft policy on the facilities to be provided in service areas, particularly Type 1 service areas. This can be inferred from section 1.4 which describes the facilities provided in the existing service areas and from the Authority's design guidelines *The Location and Layout of On-Line Service Areas (TA70/13)*. However the policy text in this section should be specific and include a brief listing of the particular facilities to be provided in each type of service area.

The Authority should consult with the HSE about the possible provision of basic health equipment, especially defibrillators, in Type 1 service areas. Consideration should also be given to arrangements for ambulance access to the motorway network and particularly whether service areas would provide suitable locations for access by helicopter air-ambulances. Consideration should also be given to the potential role of service areas in the response to major motorway accidents or other civil emergencies.

Type 2 facilities should include some information relating to other service areas on the motorway and to tourism attractions and facilities in the locality (see section 3.14 of *TA70/13*). This could be provided using robust low-maintenance information boards. Both Type 1 and Type 2 service area should provide charging points for electric vehicles and air and water for servicing vehicles.

The access arrangements between the motorway and the service area should be clearly defined with an emphasis on road safety. This is especially important for merging traffic leaving a service area and particularly for heavy commercial vehicles.

The text should explicitly reference and provide a web link to the Authority's current design guidelines rather than having to wait until section 5 to find the title of these guidelines in a footnote. We note the commitment to update the guidelines to reflect the new policy. For example, the types of service areas defined in the current guidelines are the inverse of the Type 1 and Type 2 facilities described in the draft policy.

We agree with the observation in section 4.3 that "the needs of road users would dictate there are not significant distances between Type 1 Service Areas", but suggest that the Authority elaborate on this by stating a target distance (or distance range) between such service areas.

Proposed Locations and Types of Service Area

The Institute broadly supports the proposals in this section of the draft policy. However we have some queries about the location and spacing of individual service areas, particularly where there is a stated option of providing a Type 1 or Type 2 service area. On the M8, the draft proposes either Type 1 or Type 2 service areas at both Urlingford and Cahir. The document should explicitly state that at least one of these will be a Type 1. If both were ultimately designated Type 2, there could be a distance of 120km between two Type 1 facilities which would be in breach of your policy statement in section 4.3. Hence our earlier suggestion that you set down a target distance between Type 1 facilities. A similar issue arises on the M9 which proposes either a Type 1 or Type 2 facility at Knocktopher. If this was implemented as a Type 2 service area, there would be no access to fuel and food for a distance of at least 105km which could be in breach of your policy statement in section 4.3. Table 5.2 which sets out the proposals for the M1 Dublin to Belfast route should be amended to include the service area being constructed in Northern Ireland and to demonstrate whether the service area provision over the entire route in both jurisdictions complies with the NRA's policy objectives.

Road User Information and Education

Section 6.1 states that road signage policy is outside the scope of the draft service areas policy document but then goes on to give some brief outline guidance. The Institute considers that signage policy in respect of service areas should form a fundamental part of the document and urges the Authority to reconsider. Clear and coherent signage is an essential component of the overall service areas strategy and will facilitate road users in making informed decisions as to their journey plans. It will also contribute to road safety.

Section 6.3 states that the NRA "will investigate the use of technology to provide greater levels of information to road users either via the NRA website or other

means". This statement is much too weak. There should be an explicit commitment in the document to provide detailed service areas information via the NRA website and web-based journey planners. There should also be a commitment to develop a dedicated service areas app.

Method of Delivery and Management

The Institute supports the proposals in this section. However we strongly urge the Authority to go further and set out an indicative timetable and broad order of priority for the implementation of the proposed service areas programme. We appreciate that the Authority faces continuing financial constraints, but that should not stop it setting out its broad objectives for completing the programme. The reality is that there already a need for these service areas which is very clearly articulated in section 3 of the draft document. There is also a commitment in the *Road Safety Strategy 2013-2020* to provide at least five new service areas by 2020 which, we presume, refers to Type 1 facilities. This is the minimum that must be achieved and the Institute considers that it should be the Authority's objective to provide all the proposed Type 1 facilities by 2020 at latest. Some broad order of priority, based on objective traffic and safety criteria, would also be of value. We have a situation at present where the M1 is fully provided for but provision on the other routes is very hit and miss.

June 2014