



25th July 2019

Mr Paul Hogan
Chief Planner (Acting)
Department of Housing, Planning and Local Government
Custom House
Dublin 1

Re: Making of the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly (EMRA) area

Dear Paul,

I refer to your letter of 5th July in relation to two of the material amendments (Numbers 69 and 113) made to the *Regional Spatial and Economic Strategy (RSES) 2019 – 2031* for the Eastern and Midland Region in respect of public transport matters.

As noted in your letter there are two substantive issues for consideration –

- 1) Consistency with the *Transport Strategy for the Greater Dublin Area 2016 – 2035*; and
- 2) Consistency with *Project Ireland 2040 (National Development Plan [NDP] 2018 – 2027* and *National Planning Framework [NPF])* as published by Government in 2018.

The Department notes that the issue of consistency with the above strategy and policies is a statutory requirement of the Planning and Development Act 2000 (as amended).

The Department's views on these substantive issues and the specific amendments are set out below.

The Transport Strategy for the Greater Dublin Area 2016 to 2035

As you are aware, under the Planning and Development Act 2000 (as amended), the RSES for the EMRA area is statutorily required to be consistent with the *Transport Strategy for the Greater Dublin Area 2016-2035* (“the Strategy”).

The *Strategy* is a statutory strategic transport plan for the Greater Dublin Area (defined as Dublin, Kildare, Meath and Wicklow) developed by the National Transport Authority (NTA) pursuant to section 12 of the Dublin Transport Authority Act 2008.



The current *Strategy* was approved by the Minister for Transport, Tourism and Sport in 2016 and adopted as the statutory transport plan for the region for the following 20-year period. The period covered by the *Strategy* extends beyond that of the *RSES* as made by the Eastern and Midland Regional Assembly.

In developing the *Strategy*, the NTA analysed the transport needs and capacity requirements across the region – this included looking at present and future travel demands on all the key corridors - and set out the appropriate transport solutions for each sector of the city. Development of the *Strategy* was also informed by extensive public consultation and engagement with stakeholders, including the then regional authorities.

The *Strategy* must be reviewed every six years and the NTA has indicated that this review will commence during the latter part of 2020. This review will incorporate a re-examination of travel demand across the GDA based on the most recent forecasts of population and employment distribution. New projects, over and above the extensive list of projects already in the *Strategy* can be considered as part of the review.

Project Ireland 2040

Project Ireland 2040 recognises that land-use planning and transport planning are highly interdependent and commits to the delivery of the key objectives of the statutory *Strategy*.

The *NPF* identifies key growth enablers for the GDA including:

“Delivering the key rail projects set out in the Transport Strategy for the Greater Dublin Area including MetroLink, DART expansion and the Luas green line link to MetroLink.”

The Planning and Development Act 2000 (as amended) requires the *RSES* for the EMRA to be consistent with “*national planning policy as set out in the National Planning Framework*” and “*national economic policy as set out in relevant Government strategies*”.

As part of *Project Ireland 2040*, Government has also published the *National Development Plan 2018 – 2027* which sets out “*the investment priorities that will underpin the successful implementation of the new National Planning Framework*”.

Specific comments on amendments relating to DART Expansion Programme

In relation to the DART Expansion Programme it is noted that the following text is incorporated in the *RSES*:

“DART Expansion Programme – new infrastructure and electrification of existing lines, including provision of electrified services to Drogheda and further north on the



Northern Line, Celbridge-Hazelhatch or further south on the Kildare Line, Maynooth and M3 Parkway on the Maynooth/Sligo Line, while continuing to provide DART services on the South-Eastern Line as far south as Greystones.”

The DART Expansion Programme is a cornerstone project of the *Strategy*. The Programme will see the DART system expanded, providing fast, high-frequency electrified services to Drogheda on the Northern Line, Hazelhatch on the Kildare line, Maynooth and M3 Parkway on the Maynooth/Sligo Line, while continuing to provide DART services on the Southern-Eastern Line as far south as Greystones.

The funding priority under the *NDP* in relation to the DART Expansion Programme is to ensure delivery of the non-tunnel elements of the programme over the period to 2027. The initial sequencing of investment will focus on:

- electrification of the Northern Line to Drogheda
- electrification of Kildare Line to Hazelhatch
- electrification of Maynooth Line to Maynooth and M3 Parkway
- better utilisation of the Phoenix Park Tunnel
- purchase of additional bi-mode rail fleet
- other measures such as re-signalling and junction/station changes.

The Department notes that the proposal included in the *RSES* to provide electrified services further north of Drogheda on the Northern Line is not consistent with the priorities set out in the *NDP*, while the reference to “*Celbridge-Hazelhatch or further south on the Kildare Line*” does not reflect the *NDP*’s priority to electrify as far as Hazelhatch.

Specific comments on amendments relating to the rail line to Navan

In relation to rail, it is noted that the following text is incorporated in the *RSES*:

“Implement the extension of the Dunboyne/M3 Parkway line to Navan during the Mid Term Review of the GDA Transport Strategy.”

The issue of a potential extension of the existing Dunboyne/M3 Parkway line was considered by the NTA during its development of the *Strategy*. The *Strategy* considered that the level of travel demand between Navan and various stations to the city centre was insufficient to justify the development of a high-capacity rail link at that current time.

Using extensive census information, travel surveys and other relevant data, extensive transport modelling work was undertaken by the NTA. This analysis indicated that: “*the level of travel demand between Navan, Dunshaughlin and various stations to the city*



centre is insufficient to justify the development of a high-capacity rail link at this time. To serve this corridor, it is proposed to provide an enhanced bus service along the M/N3 in conjunction with the development of a bus hub in Navan. Bus services on the N2 will also be enhanced and a core bus corridor will be provided to Tyrellstown via Ballycoolin from the N2 at Finglas.”

The NTA has committed in the *Strategy* to undertake a re-evaluation of the case for a rail link to Navan as part of its statutory review of the *Strategy*. This commitment is referred to in the *NDP* which states that the NTA’s review of the *Strategy* will take into account the scale of new and planned development along the route. Pending the review, the NTA has recommended to Meath County Council that the corridor, which had previously been identified as the route for a potential rail link to Navan, be protected from development intrusion.

The Department notes therefore that the current reference to the Dunboyne / M3 Parkway line in the *RSES* as made by the Eastern and Midland Regional Assembly on 28 June 2019 is not consistent with the *Strategy*.

Specific comments on amendments relating to Metro

In relation to Metro, it is noted that the following text was incorporated into the *RSES*:

“Complete construction of MetroLink from Swords to Sandyford, including underground extensions to UCD and Knocklyon from Charlemont.”

The *Strategy* sets out an ambitious range of improvements across the area of Metro. These improvements include:

- the development of a Metro from the city centre to North County Dublin;
- the need to improve the capacity of the Green Line in advance of its upgrade to Metro standard
- the development of a Metro from the city centre to South County Dublin along the LUAS Green Line

The *NDP* commits to provide investment for the delivery of these projects laid out in the *Strategy* and the NTA is currently developing proposals in that regard.

The Department notes therefore that the current references to “*underground extensions to UCD and Knocklyon from Charlemont*” in the *RSES* as made by the Eastern and Midland Regional Assembly on 28 June 2019 are not consistent with the *Strategy*.

Specific comments on amendments relating to Light Rail

In relation to light rail, it is noted that the following text is incorporated into the *RSES*:



“Appraisal, planning and design of LUAS network expansion to Bray, Lucan, Poolbeg, Hazelhatch, Booterstown and Blessington.”

The *Strategy* includes a number of proposed extensions of the LUAS network over the lifetime of the *Strategy*. The extensions proposed are to Bray (following upgrading of LUAS Green Line to Metro standard), to Finglas, to Lucan and to Poolbeg. In line with the *Strategy*, the *NDP* provides funding to undertake appraisal, planning and design of LUAS network expansion to Bray, Finglas, Lucan and Poolbeg.

The Department notes therefore that the current references to “*Hazelhatch, Booterstown and Blessington*” in the *RSES* as made by the Eastern and Midland Regional Assembly on 28 June 2019 are not consistent with the *Strategy*.

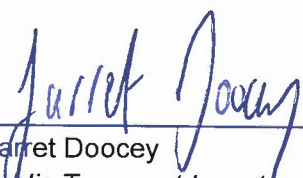
Conclusion

The Planning and Development Act 2000 (as amended) provides the statutory basis to the new *National Planning Framework*, and, addressing a weakness of previous spatial strategies as identified by the *NPF*, introduces a statutory requirement to ensure consistency between the *NPF* (and the *Strategy* in relation to the GDA) and a *RSES*.

As referred to above, this Department notes that the *RSES* as made by the Eastern and Midland Regional Assembly on 28 June 2019 contains references to projects which are not consistent with the *NPF*, the *NDP* and/or the *Strategy* and, this Department believes, are therefore not consistent with the legislative requirements of the Planning and Development Act 2000 (as amended).

I am happy to discuss any of these issues further if required.

Yours sincerely,



Garret Doocey
Public Transport Investment Division

