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Road Transport Freight Policy Division, Department of Transport, Leeson Lane, Dublin 2.

16th July 2021

Re: Submission to the Draft Ten-Year Strategy for the Haulage Sector SRA File Ref: 21/GD005

A Chara,

The SRA welcome the opportunity to contribute to this consultation on the development of a 10 Year Strategy for the Haulage Sector.

As an export island economy, improved access, safer and guaranteed journey times between urban nodes, ports and airports for our trade is vital to our economic competitiveness. The ability to service future population and employment growth in our Region through sustainable freight, delivery and services is also vital to our progress.

This submission supports the development of a 10-Year Strategy for the Haulage Sector and the Department's goal to develop a strategy focusing on generating efficiencies, improving standards, creating employment and assisting the sector transition effectively to a low-carbon future. These priorities align with the Regional Spatial and Economic Strategy for the Southern Region (RSES) published in January 2020.

Through the RSES Strategy Statements¹ of Enhanced Regional Accessibility, Sustainable Mobility, High-Quality International Connectivity and a Low Carbon Climate Resilient Society, the SRA seek investment for strengthened multi-modal connectivity in our Region for the efficient movement of people and goods.

The RSES supports effective land use and transport planning integration to transition our Region to higher levels of sustainable mobility, strengthening and protecting our strategic road networks for essential economic lifelines and public transport movement and investment in our rail network as a strategic asset which can be optimised for freight movement.

Further, the RSES seeks the transition of transportation fleets (private, public, commercial) to lower carbon fuels, electrification (electric vehicles and rail) and deployment of lower carbon fueling facilities along our strategic transport corridors to decarbonise the transport sector.

This consultation is also timely as, through our RSES implementation, the SRA is progressing the development of separate but inter-related Freight, Ports and Harbours and Airport Strategies in consultation with the Department, transport agencies and key asset holders.

¹ 11 RSES Strategy Statements at page 24 of RSES.

The SRA will also be progressing a Regional Decarbonisation Plan which will address decarbonisation in the transport sector.

These strategies are currently at the scoping stage with stakeholders including divisions of the Department of Transport. The findings from consultation on the 10-Year National Haulage Strategy will benefit this work. The SRA will welcome the opportunity to stay engaged with the Department across our initiatives under these themes.

The implementation of the 10-Year Strategy for the Haulage Sector is also important to the work of the SRA in ensuring the delivery of investment through the European Regional Development Fund co-financed programmes, including the 2021-2027 programme for the Southern and Eastern & Midland Regions which the Southern Regional Assembly are responsible for managing.

This programme will focus on smart cities and a smart region, lower carbon emissions, climate resilience and urban regeneration, themes that align with the goals of the 10 Year Strategy for the Haulage Sector.

Our recommendations align with other past and recent consultations on transport for our Region including the National Investment Framework for Transport in Ireland (NIFTI) and National Development Plan Review. Other examples include the Rail Consolidation Strategy, National Rail Freight Strategy, Sustainable Mobility Policy Review, Connect Ireland Rural Mobility Plan and the on-going preparation and implementation of Metropolitan Area Transport Strategies for Cork, Limerick-Shannon and Waterford and Local Transport Plans in our Region.

Our submission is structured as follows:

- Section 1.0 Context of the RSES.
- Section 2.0 Decarbonisation of Transport
- Section 3.0 Regional Connectivity
- Section 4.0 Regional and International Connectivity of Freight
- Section 5.0 Intermodal Transport
- Section 6.0 Metropolitan Transport Plans and Local Transport Plans
- Section 7.0 Intelligent Transport Systems

1.0 Context of the RSES

The Region's priorities for investment are identified in the RSES and Metropolitan Area Strategic Plans (MASPs) for Cork, Limerick-Shannon and Waterford which came into effect on the 31st January 2020.

In line with the National Planning Framework (NPF) and the National Development Plan (NDP), they set a 12-year statutory strategic planning and economic development framework for future economic, spatial, and social development of Southern Region to become one of Europe's most "Creative and Innovative", "Liveable" and "Greenest" Regions.

The Southern Region has the State's most significant proposition to achieve the aim of Regional Parity. The NPF and RSES targets our three cities to grow by over 50% to 2040 as part of a structural realignment away from the Greater Dublin Area with a 50:50 distribution of growth between the Eastern and Midlands region and the Southern and Northern and Western Regions.

By 2040, the population of the Region is projected to rise to almost two million, requiring new homes and jobs. RSES Appendix 1, page 347 sets out Local Authority population projections to 2031, which combined deliver a projected uplift between 280,000 to 343,500 in the Region to 2031. These are extremely ambitious targets which have never been accomplished in the State's history. Their achievement requires a structure change in the scale and nature of

investment to the Regions and the Metropolitan Areas of Cork, Limerick- Shannon, Waterford and Galway.

The scale of population growth targeted for each of the region's cities and their metropolitan areas is significant. 50-60% growth beyond 2016 population to 2040 is targeted. The RSES and MASPs set a framework for the sustainable growth of Cork by over additional 104,600 persons to 2031 (75,000 of which is in the city and suburbs). Growth for Limerick Shannon is targeted at over 45,132 additional persons (35,247 in the city and suburbs) in the same period. Growth for Waterford is targeted at over 21,900 additional persons to 2031 (20,700 in the city and suburbs).

The settlement strategy builds on the Region's three cities and metropolitan areas of Cork, Limerick -Shannon and Waterford as engines of growth supported by a network of 14 strategically located Key Towns namely Kilkenny, Ennis, Carlow, Tralee, Wexford, Clonmel, Killarney, Mallow, Nenagh, Thurles, Newcastle West, Clonakilty, Dungarvan and Gorey.

Regeneration and growth across our Region's Cities, Key Towns and further through its network of towns, villages and rural communities are supported to build an economically resilient, competitive and growing region.

Achieving such ambitious targets will require an equally ambitious alignment in funding priorities and service delivery. Transport infrastructure, integration between different transport modes (road and rail) and a strong haulage sector is fundamental to service the Region's growth.

References to the final published RSES and the MASP for Cork, Limerick-Shannon and Waterford can be obtained through http://www.southernassembly.ie/regional-planning/rses

Section 2.0 Decarbonisation of Transport

The SRA welcome the emphasis in the consultation document on the urgent need for the sector to transition to new vehicle technology and lower carbon fuels in a context where the movement of goods by road remains the second biggest source of transport emissions after private car use and where, without significant policy action, the emissions trajectory is set to continue to rise in the EU by a magnitude of 17% between 2010 and 2050 and at an even steeper rate in Ireland.

Aligned with the transition to EU climate neutrality by 2050 and the European Green Deal, the RSES seeks initiatives that will achieve the decarbonisation of the transport sector. This will require effective land use and transport planning integration, achievement of compact growth and a shift to more sustainable means of freight and logistics transport including an increased role for rail freight.

Decarbonising transport will also focus on alternative and low emission fuels for freight vehicles, modal shift to rail freight and increased electrification of freight transport. Regional Policy Objectives (RPOs) seek deployment and use of clean generated electricity, bio-gas, hydrogen and other non-fossil fuels for private and public transportation and provision of a wider network of clean energy and lower carbon fueling station facilities by 2030.

Under RSES RPO 90 Regional Decarbonisation, all initiatives for meeting national obligations to decarbonise the transport sector shall be addressed through a Regional Decarbonisation Plan.

The SRA support the Strategy's pursuit of other demand policies and tools which are needed in tandem with infrastructure provision, especially in areas such as fiscal incentives to make

greener technology more affordable, accessible and viable for business in our transition to a lower carbon economy.

The Department's actions under the Low Emissions Vehicle Taskforce and other initiatives for greater take up across alternative fuels and electric vehicles are such examples. Actions from such initiatives can inform the 10-Year Haulage Strategy with specific measures to assist the sector access and optimise new technology and cleaner fuels.

Recommendation No 1: Decarbonisation in the Transport Sector

- The 10 Year Strategy for the Haulage Sector can support a greater level of ambition in actions in the deployment of zero or lower-emitting alternative vehicle technologies and clean energy fueling station infrastructure with an emphasis on greening the freight sector to meet our national commitments under the National Climate Action Plan and the EU's New Green Deal.
- In particular, the strategy should prioritise implementation of actions under the DTTAS National Policy Framework for Alternative Fuels Infrastructure for Transport 2017-2030 and Low Emissions Vehicle Taskforce.
- In addition to the provision of infrastructure and facilities, the Department should integrate with other Departments the opportunities of fiscal incentives that reward the commercial sector for transitioning to low carbon technologies and ensure that such technologies and fuels are affordable and accessible to commercial operators.
- The Department, through the implementation of the strategy, will be a key stakeholder for the SRA in the future development and implementation of a Regional Decarbonisation Plan. Future collaboration on the beneficial cross over between both our initiatives will be welcomed.

This recommendation aligns with and achieves RSES RPOs 90, 91, 93, 139.

Section 3.0 Regional Connectivity

In alignment with the consultation document discussion on the need to deliver strategic national and regional infrastructure, including key projects through the NDP and the National Investment Framework for Transport in Ireland (NIFTI), the SRA concur that investment in national and regional road corridors remains an important consideration, both for steady state maintenance and new improved corridors.

The NPF, NDP and RSES in turn has identified strategic road corridor improvements, especially improved corridors connecting our cities and Tier 1 and Tier 2 Ports. In larger urban areas, strategic road investment for orbital routes can facilitate a more efficient separation of economic and HGV movements, reduce congestion in the urban cores to improve the public realm, interchange facilities and active travel and allow new bus corridors to be established.

These projects, identified in co-ordination with the NTA and TII with additional regional priorities through the RSES process, are at different stages of the assessment, design and planning, but all need to be supported and progressed to underpin transport infrastructure led economic growth, particularly as enablers of compact sustainable growth and for freight, delivery and servicing of our Region's population and economy.

Recommendation No 2: Enhance Road Networks and Public Transport Corridors

 The 10 Year Strategy for the Haulage Sector can support investment through the NDP, RSES, MASPs and transport authorities that enhance the Region's strategic road networks and public transport corridors that connect the Region's Cities and Metropolitan Areas, Ports and Airports, Economic Corridors and Key Towns.

- Capital investment in the steady state maintenance and enhancement of road networks deliver for sustainable transport, economic resilience, freight distribution and supply chains.
- Investment in the road networks also enable transformative urban regeneration in city and town centres, allowing new traffic management solutions to unlock large scale brownfield sites for regeneration, re-directing the through movement of freight from densely populated areas.
- Aligned with this recommendation, Recommendation 3 and 4 below support increased integration between road and rail for freight movement as part of our Region's strengthened multi-modal transport networks between urban nodes, ports and airports.

This recommendation aligns with and achieves RSES RPOs 140, 141, 156, 158, 166-168, 171, 172, Cork MASP Objective 9, Limerick-Shannon MASP Objective 8, and Waterford MASP Objective 7.

Section 4.0 Regional and International Connectivity of Freight

Improved regional connectivity, road and rail, for moving people and goods between our Region's economic drivers and international connectivity gateways of ports and airports on safe, efficient networks with guaranteed journey times is essential for our economic competitiveness and resilience.

This includes the movement and distribution of logistics between our cities and metropolitan areas of Cork, Limerick-Shannon and Waterford, the Atlantic Economic Corridor, the Eastern Economic Corridor and between our Tier 1 and Tier 2 Port assets (Ports of Cork, Shannon-Foynes, Waterford-Belview and Rosslare Europort), National Airports (Cork and Shannon) and Regional Airports (Kerry and Waterford).

These ports and airports are individual and a combined strength for our State's international connectivity and economic growth, with a key role for EU, UK, and international trade post Brexit. Optimising the capacity of these assets for economic competitiveness advances Regional Parity and provides a counterbalance to pressures on Dublin's infrastructure.

Completion of the EU TEN-T multi-modal Core and Comprehensive Networks through our Region, in addition to the transport projects identified through the RSES, MASPs, Metropolitan Transport Strategies and Local Transport Plans which will develop freight and passenger distribution networks within and around our urban nodes and to and from our international transport gateways, require strong support.

Through RSES RPOs 141 Regional Freight Strategy, RPO 145 Ports and Harbour Strategy for the Southern Region, RPO 149 Airport Strategy for the Southern Region and RPO 90 Regional Decarbonsiation, the SRA are in the process of defining the scope and role of these strategies to inform a strengthening of national policy and the development of actions by the relevant departments and agencies for a resilient and greener future in these sectors from the perspective of regional stakeholders.

Recommendation No 3: Regional and International Connectivity of Freight

 The 10 Year Strategy for the Haulage Sector can support the capacity and collective strength of our port and harbour assets and airport assets in the Regions for the economic competitiveness of our State by completing the TEN-T Core and Comprehensive Networks and strengthening sustainable multi-modal (road and rail) networks for freight and passenger mobility between ports, airports and urban nodes. • The Department, through the implementation of this strategy will be a key stakeholder for the SRA in the development and implementation Regional Freight, Ports and Harbours and Airport Strategies under our RSES priories for strengthened Regional Connectivity and strengthened International Connectivity (RPOs 141, 145 and 149). The SRA are currently engaging with divisions of the Department of Transport and transport authorities (TII and NTA) on the scope and role of these strategies. Future collaboration on the beneficial cross over between both our initiatives will be welcomed.

This recommendation aligns with RSES RPOs 140, 141, 145, 156, 158, 166-168, 171, 172, Cork MASP Objective 9, Limerick-Shannon MASP Objective 8, and Waterford MASP Objective 7.

Section 5.0 Intermodal Transport

The SRA supports the consultation document's inclusion of support for greater use of rail in freight distribution. As noted by the Department, rail freight is still a minor player in the overall current freight market in Ireland despite the reach of our rail network but it is in a good position to compete with the large volume and the bulk movement of goods and a growing market for environmentally efficient ways of managing their supply chain.

Aligned with the EU's Sustainable and Smart Mobility Strategy for rail freight traffic within the EU to increase by 50% by 2030 and double by 2050, the RSES supports our rail networks as key corridors for sustainable movement of people and goods into the future.

The RSES has identified a greater role for our rail network through:

- Enhanced role of rail corridors for movement of people and freight.
- Align transportation planning with spatial land use planning to optimise access to public transport, especially rail stations.
- For an economically competitive region, we need to modernise our rail infrastructure, guarantee and reduce journey times, especially between each of the four cities and metropolitan areas outside of Dublin as well as to Dublin.
- The scope for electrification needs to be pursued.
- There is an urgent need to transition public transport fleets to lower carbon fuel sources.
- The role of multi-modal travel chains received significant focus for greater transition to sustainable travel. For freight, this includes the integration of freight distribution centres road and rail for transitioning freight between different mode and vehicle types. The development of a National Freight Strategy supported by Regional Freight Strategies and (can be addressed in turn at the local level through the relevant City and County Development Plans, Metropolitan Transport Strategies and Local Transport Plans) can assist planning and delivering freight road and rail interchange facilities.
- Optimise rail freight between urban nodes and ports in the Southern Region. Limerick
 Junction for example is an important regional asset connecting the Dublin, Cork,
 Limerick and Waterford rail corridors with potential extensions to the western rail
 corridor (a link between the Atlantic Economic Corridor and Eastern Corridor). There
 is potential to re-instate the Limerick-Foynes Freight Line. At the Port of Cork site of
 Marino Point, there is an opportunity to optimise the rail connection with deep water
 wharf facilities and port/marine industries. There is potential to strengthen freight and
 logistics networks at both Rosslare Europort and Port of Waterford Belview.

 Support the role of rail networks in the successful implementation of economic corridors and urban networks across the region, connecting settlements and strategic employment locations.

Recommendation No 4: Maintain, Enhance and Extend Rail Infrastructure for Strengthened Intermodal Transport

- The 10 Year Strategy for the Haulage Sector can support capital investment to maintain, improve and extend the existing rail network of the Regions.
- Specific investments should target inter-city rail and the potential for electrification of rail for higher speeds and efficient journey times between our cities, key towns and along economic corridors (the Atlantic Economic Corridor, Eastern Economic Corridor and east-west connection between the two along the existing road and rail network) and target specific opportunities for rail-based freight distribution.
- Investment is required to develop multi-modal interchange with rail, transitioning the fleets to renewable or low carbon sources, and improving the passenger facilities and services.
- The strategy can support, through the development of a Regional Freight Strategy under RSES RPO 141, the feasibility of delivering a national freight and passenger hub in the Southern Region, reinstatement of freight lines on our Region's rail network and integrating road and rail freight transport modes. Future collaboration between both our initiatives under the theme of intermodal transport will be welcomed.
- The priorities that emerge through the strategy for intermodal freight transport should be integrated with the Department's other recent and on-going initiatives including the recent Rail Consolidation Strategy and National Rail Freight Strategy on which the SRA were a stakeholder consultee.

This recommendation aligns with and achieves RSES RPOs 91, 140, 141, 160-166, 170, Cork MASP Objective 7 & 8, Limerick MASP Objective 7, and Waterford MASP Objective 6

Section 6.0 Metropolitan Transport Plans and Local Transport Plans

Metropolitan Transport Strategies

The SRA support the references to Metropolitan Transport Strategies in the consultation document. The scale of challenge to transition travel to sustainable modes in cities and metropolitan areas in the context of high growth is significant. The RSES and MASPs highlight that 2016 travel patterns are dominated by private car which leads to congestion on the strategic road network, impacting on supply chains and guaranteed journey times for essential freight, delivery and services between urban nodes, ports and airports.

Transport investment, with a focus on sustainable travel between our cities along with sustainable and active travel within our cities and metropolitan area for daily activities, is a key enabler for each city and metropolitan area. Investment is urgently needed to transition travel patterns to public transport and active modes across cities and metropolitan areas.

The RSES specifically identifies transport investment priorities under all transport modes to be addressed by a metropolitan transport strategy for Cork, Limerick-Shannon and Waterford.

Each MASP in turn integrates specific objectives for integrated land use and transport planning, sustainable transport and investment under the metropolitan transport strategies. Progress by the NTA, TII, Local Authorities and stakeholders (which include the SRA) is positive with the Cork Metropolitan Transport Strategy completed and at implementation stage, the Limerick-Shannon Metropolitan Transport Strategy at draft stage and the Waterford

Metropolitan Strategy at pre-draft preparation stage with stakeholders (including the Regional Assembly).

Each metropolitan transport strategy addresses sustainable freight management, recognising that to meet projected growth, increased levels of freight, delivery and services through HGVs will be generated. At city and town level, there will be a greater level of delivery and servicing activity.

Example of overarching objectives for the management of freight include:

- Re-directing the through movement of freight from densely populated areas and unsuitable local roads to the strategic road network;
- Examining the feasibility of consolidation centres and break-bulk facilities outside of the national road network in the medium term, to facilitate smaller lower emission vehicles delivering to town and city centres;
- Ensuring that delivery, servicing and waste management trips are made as green and quiet as possible using zero or low emission vehicles where appropriate; and
- Examine the case for urban or micro-consolidation to reduce the number of last mile trips being made by motorised vehicles e.g examining the case for cargo bikes or small electric vans delivering to restaurants and shops etc.

From the regional perspective, the preparation, implementation and follow through investment in delivering metropolitan transport strategies which include measures to address freight, delivery and servicing management cannot be over-stated. For the regions to succeed, our cities and metropolitan areas must be prioritised for investment in transport infrastructure projects.

Recommendation No 5: Implement Metropolitan Transport Strategies

• The 10 Year Strategy for the Haulage Sector can support the National Transport Authority, Transport Infrastructure Ireland, Local Authorities and other stakeholders in the preparation and implementation of Metropolitan Area Transport Strategies which are transformative game changers for sustainable transport infrastructure led planning. Funding packages specific to each city and metropolitan area, aligned to the infrastructure projects and delivery of short term, medium term and longer-term transport priorities including priorities for sustainable and effective freight, delivery and services management need to be supported.

This recommendation aligns with and achieves RSES RPOs 160-165, 170, 171, 174, Cork MASP Objective 7 & 8, Limerick MASP Objective 7, and Waterford MASP Objective 6.

Local Transport Plans

Local Transport Plans (LTPs) are an objective of the RSES. They are an important framework for transport investment, integration of land use and transport planning and transition to sustainable mobility for towns and rural areas across our Regions.

LTP's will be prepared by the NTA in co-ordination with TII, Local Authorities and other stakeholders (including the SRA) for Key Towns and other large settlements across our Region.

LTPs will maximise the delivery of sustainable and active travel infrastructure and importantly, will also plan for the efficient and sustainable movement of people, goods and services at settlement level.

Currently in our Region, a LTP for Kilkenny is at draft preparation stage and when completed, it will set a high-quality benchmark for what LTP's should address and implement. This process should be highlighted as a good practice case study when completed.

Recommendation No 6: Implement Local Transport Plans

• The 10 Year Strategy for the Haulage Sector can support the NTA, TII, Local Authorities and other stakeholders in the preparation and implementation of Local Transport Plans (LTPs). Funding packages specific to each town and plan area, aligned to the infrastructure projects and short term, medium term and longer-term priorities including priorities for sustainable and effective freight, delivery and services management identified in LTPs should be supported.

This recommendation aligns with and achieves RSES RPOs 11, 12-25, 157 and 160-163.

Section 7.0 Intelligent Transport Systems

The SRA support the consultation document's emphasis on the role of smart technology to achieve our objectives for lower carbon transport and the EU's Green Deal support for increased digitalisation and use of data in the sector and management of our transport networks.

The consultation document highlights innovation in areas such as Connected, Co-operative and Automated/Autonomous mobility (CCAM) and an Irish pilot in co-operative intelligent transport systems (C-ITS).

The RSES is aligned in its support for innovation in the transport sector and promotes the "Smart City" concept which envisages that digital technology is embedded across all city functions as a platform to solve complex challenges. It involves systematic integration of information and communication technologies (ICT) in planning, design, operations and management of public services including transport.

Smarter mobility across all transport sectors, including freight, delivery and services, will be a key pillar of a Smarter Region. The RSES seeks to build on initiatives offered from the concept of "Smart Cities", with the view of extending such activities to other towns, villages and rural areas across the region, thereby developing a wider "Smart Region".

To support the development of a "Smart Region", investment in digital infrastructures, research and innovation, new technologies, the sharing of data and integration of services (public and private operators) for multi-modal transport ecosystems (such as Mobility as a Service systems) will be important and will benefit freight, deliveries and services, especially for servicing our compact urban centres in a more sustainable way.

Our Region is a leader in research, development and testing of Connected and Autonomous Vehicles and smart transport infrastructure, the Future Mobility Campus Ireland in Shannon is a positive example of our opportunity to be a world leader in developing this technology for the future of lower carbon smarter transport (https://futuremobilityireland.ie).

The strategy should support continued investment for innovation and partnerships between public, private and research sectors for testing and deploying such technologies region wide.

The SRA, under RSES RPO 134 Smart Cities and Smart Region and the EU Interreg Europe Cohes3ion Project http://www.southernassembly.ie/eu-projects/COHES3ION, are currently developing a framework to assist in the development and implementation of Smart City and Smart Region initiatives and projects under a number of themes, including smarter transport, in our Region. The SRA will welcome future collaboration with the Department on the development of our framework as it progresses.

Recommendation No 7: Smart Mobility

- The 10 Year Strategy for the Haulage Sector can support smart mobility as a key attribute of Smart Cities and a Smart Region and support investment and public private sector collaborations with centres of research and development (such as the Future Mobility Campus Ireland in Shannon) in the testing and deployment of Connected and Autonomous and smarter transport infrastructure region wide. Such innovation will benefit smarter freight, delivery and services, especially in the sustainable lower carbon distribution of goods and services.
- The strategy should support a systematic integration of ICT in the planning, design, operations, and management of transport services of the Region's settlements.
 Investment should leverage intelligent low carbon e-mobility and Mobility as a Service Systems.
- The Department, through the implementation of the 10 Year Strategy for the Haulage Sector will be a key stakeholder for the SRA in the implementation of a Smart Region Framework under RSES RPO 134 and the Interreg Europe Cohes3ion project. Smart transport infrastructure and services will be a key pillar of a Smart Region with benefits to lower carbon freight, deliveries and services. Future collaboration on the beneficial cross over between both our initiatives will be welcomed.

This recommendation aligns with and achieves RSES RPOs 134, 157, 160-164, Cork MASP Objective 7 & 8, Limerick MASP Objective 7, and Waterford MASP Objective 6.

Conclusion

The SRA welcome this consultation opportunity with the Department of Transport and are a committed stakeholder and key consultee for the Department in the final development and implementation of the 10-Year Strategy for the Haulage Sector.

The objectives of the RSES and MASPS for Cork, Limerick-Shannon and Waterford align with the priorities and goals for this strategy, as demonstrated in our submission and recommendations.

Continued engagement between the SRA and the Department of Transport on this and other initiatives will be encouraged and welcomed, especially as the goals of the 10 Year Strategy for the Haulage Sector are aligned with our current work on RSES implementation through the development of Freight, Ports and Harbours and Airport Strategies, Regional Decarbonisation Plan and frameworks to develop the Southern Region as a Smart Region (with smart transport as a key pillar).

I trust the above recommendations can be taken on board to help strengthen the final strategy from the Region's perspective. The SRA would welcome the opportunity to engage with the Department of Transport on these recommendations and are available for future consultation and clarities as required.

Mise le meas,

David Kelly, Director