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30<sup>th</sup> November 2022

**Re: Submission to Ireland's Road Haulage Strategy 2022-2031**  
**Technical Follow Up to Initial Submission to the Draft Ten-Year Strategy for the Haulage Sector**  
**SRA File Ref: 21/GD003**

A Chara,

The Southern Regional Assembly (SRA) welcome the publication of the Draft Ireland's Road Haulage Strategy 2022-2031. This submission is made as a technical follow up to our submission on the Draft Ten-Year Strategy for the Haulage Sector on 16<sup>th</sup> July 2021.

This submission is structured as follows:

- 1.0 Past SRA Recommendations to the Draft Ten-Year Strategy for the Haulage Sector
- 2.0 Recommendations for the Final Ireland's Road Haulage Strategy 2022-2031
- 2.1 Freight, Ports and Harbours and Airport Strategies in the Southern Region
- 2.2 Integrate the Regional Assemblies within the proposed Road Freight Forum
- 2.3 Opportunity for Future Data Sharing
- Conclusion

**1.0 Past SRA Recommendations to the Draft Ten-Year Strategy for the Haulage Sector**

In our past submission, the SRA made recommendations for:

- **Decarbonisation of Transport:** Zero or lower-emitting alternative vehicle technologies and clean energy fueling station infrastructure with an emphasis on greening the freight sector.
- **Enhance Road Networks and Public Transport Corridors:** 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.
- **Regional and International Connectivity of Freight:** 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.
- **Maintain, Enhance and Extend Rail Infrastructure for Strengthened Intermodal Transport:** 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.
- **Metropolitan Transport Plans and Local Transport Plans:** Support the preparation and implementation of Metropolitan Area Transport Strategies and Local Transport Plans which

will be transformative game changers for sustainable transport infrastructure led planning for cities, metropolitan areas, key towns and other settlements. These plans will also be effective for freight, delivery and services management.

- **Intelligent Transport Systems and Smart Mobility:** As part of a Smart Region, support innovation in transport, public and private sector collaborations, testing and deploying smarter transport and logistics infrastructure region wide. Such innovation will benefit lower carbon distribution of goods (break bulk facilities to smaller low carbon vehicles), especially last mile journeys servicing urban centres.

## **2.0 Recommendations for the Final Ireland’s Road Haulage Strategy 2022-2031**

The SRA commend the comprehensive strategy prepared following stakeholder consultation. It is evident that the recommendations made in our submission have been addressed in a comprehensive manner under the seven policy themes of the draft strategy.

The SRA especially welcome support in Section 7.4 “Integrated Transport Planning & Intermodal Transport” for the Regional Spatial and Economic Strategies (RSEs) in each Region and the shared objectives for integrated transport planning, strengthened regional and rural connectivity, connectivity to our ports and airports and multi modal movement of goods within and between the regions. Support is also stated and welcomed for the implementation of the Cork, Limerick-Shannon and Waterford Metropolitan Transport Strategies and for Local Transport Plans for sustainable freight management.

The following three recommendations are further provided to strengthen regional level support for the final strategy and implementation of actions.

### **2.1 Freight, Ports and Harbours and Airport Strategies in the Southern Region**

**Recommendation 1:** Support the development of the Southern Region’s Freight, Ports and Harbours and Airport Strategies within the final Ireland’s Road Haulage Strategy and in the implementation of Actions 22-25.

#### **Reasons for Recommendation 1**

The region’s support to strengthen our sustainable future for multi-modal freight, ports and aviation sectors is critical not only for our transition to a low carbon future and meeting CO2 reduction targets in transport under the Climate Action Plan as identified by the draft strategy. It is also essential to ensure we have resilient regional and international connectivity for efficient supply chains that will serve our targeted population and economic growth and grow our state and regional economies under the NPF and RSES<sup>1</sup>.

The SRA, with stakeholder consultation and specialist service research input, will progress the preparation of separate but inter-related strategies for Freight, Ports and Airports to achieve National Planning Framework (NPF) and RSES priorities for Enhanced Regional Accessibility, Sustainable Mobility and High-Quality International Connectivity. These strategies are mandated under RSES implementation<sup>2</sup>.

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<sup>1</sup> 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.

<sup>2</sup> RSES Regional Transport Strategy Chapter 6 and Regional Policy Objectives 141, 145 and 149. These strategies will be prepared in coordination with the Department of Transport, Transport Authorities (NTA, TII) and other stakeholders.

The SRA have prepared and shared with the Department of Transport Project Charters setting out the objectives and deliverables of these strategies. To be effective, it is essential our Freight, Ports and Harbours and Airport Strategies are tailored to support central government policy making and implementation.

It has been agreed with the Department's Divisions for Ports Policy and Aviation Policy that our work on these strategies can be focused to assist the review of National Ports and Aviation Policy. This is important to leverage the regional tier to assist the work of central government and coordinate regional stakeholders to bring regional level consensus on the priorities to be acted on.

Working with the regional tier will assist central governments achievement of regional parity and balanced regional development, a policy of government under the NPF.<sup>3</sup>

Our statutory role in setting the framework for planning and economic development of the Region provides an opportunity to connect the implementation of national strategies to local level actions and delivering regional initiatives under RSES implementation in partnership with stakeholders and local authorities.

Our role as a managing authority under European Regional Development Funding<sup>4</sup> and as a partner Region in EU cooperation projects brings an impactful opportunity to apply EU good practice and knowledge within our RSES implementation actions.

We consider our forthcoming work on Freight, Port and Airport Strategies can align to the implementation of actions under the final Road Haulage Strategy. There is positive precedence for this where the Regional Assemblies are integrated on the Leadership Team and Delivery Team for the implementation of actions under the National Sustainable Mobility Policy, which is proving effective to give regional level support and momentum for actions<sup>5</sup>. The Regional Assemblies have also been contacted by the Department for integration with the Department's Zero Emissions Vehicles Ireland EV Infrastructure Strategy, to assist regional level coordination and implementation of the final strategy through EV network plans at regional and sub regional level.

The support of the Road Transport and Freight Policy Division and guidance for the freight element of these strategies, advice on the regional research and the regional coordination that will be effective to assist the Department implement the Road Haulage Strategy within the Regions, will be welcomed.

We believe a signal of intent for this under Section 7.4 "Integrated Transport Planning & Intermodal Transport" will be a positive addition to the draft. The inclusion of the Regional Assemblies as a stakeholder in the multi sectoral implementation structure to deliver actions under the Road Haulage Strategy<sup>6</sup> (see Recommendation No 2) and consultation meeting with the Road Transport and Freight Policy Division on our Region's work in support of freight, ports and airport sectors is recommended.

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<sup>3</sup> 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.

<sup>4</sup> The Southern, Eastern and Midland Regional Programme 2021-2027 was formally announced by Government on the 29<sup>th</sup> November 2022 <http://www.southernassembly.ie/news/news-article/641-million-investment>

<sup>5</sup> The SRA initiated and are the project lead for Pathfinder Project 30 : A training, education and capacity building workshop programme to support Local Authorities and Stakeholders in each of the three Regions to design and implement smart and sustainable mobility projects under the National Sustainable Mobility Policy (SMP) Action Plan 2022-2025

<sup>6</sup> Draft Road Haulage Strategy Actions 22-25 especially.

Below are some of the thematic priorities and actions of the Draft Road Haulage Strategy the SRA fully support and which our regional role and RSES implementation will support:

- **Inter-Modal Freight**
  - Develop inter-modal freight networks through an expanding role for rail freight and interchange facilities , serving as multi-purpose freight interchange and distribution centres linking the rail and road networks. The implementation of Rail Freight 2040 and the final All Island Strategic Rail Review in our Region are key to achieving progress. Both will support investment in strengthening and expanding our rail freight assets, support existing rail links to Waterford Port and Rosslare Europort, the reinstated Shannon Foynes rail connection (making significant progress) and the feasibility of rail services to the Port of Cork facilities at Marino Point. The potential to develop inter road and rail terminal infrastructure at Limerick Junction will also progress through these strategies<sup>7</sup>.
- **Logistic Hubs**
  - Develop logistic hubs for freight consolidation and distribution through zero/low-carbon last mile delivery services and micro mobility (e.g. e-cargo bikes) outside/adjacent to urban centres including our Region’s Cities and Metropolitan Areas and larger Key Towns<sup>8</sup>.
- **TEN-T Network**
  - Continued investment in the maintenance and enhancement of the TEN-T Core and Comprehensive Network through our Region and investment for multi-modal, lower carbon freight connectivity along the national Economic Corridors through our Region (Atlantic Economic Corridor and Eastern Corridor extending to Rosslare Europort)<sup>9</sup>. The SRA continue to support the delivery of strategic road infrastructure projects identified in the NDP, RSES and Metropolitan Transport Strategies accessing our Port facilities (Port of Cork, Port of Shannon Foynes, Port of Waterford, Rosslare Europort and Regional Ports and Harbours). These are essential as economic lifelines and resilience in our Region, as key connections as part of multi modal freight corridors, enable public transport (bus) corridors and unlock city centre urban regeneration such as city dockland regeneration.
- **Smart Mobility**
  - Support for demonstration projects, living labs and testing innovation in technology deployment and new approaches to lower carbon freight movement. The Draft Strategy has given prominence to EU and UK innovations that may have ability to be replicated. This is especially an opportunity for zero carbon urban logistics and last mile delivery. The SRA fully support these priorities and will seek to integrate both its Regional Planning and EU Projects functions under the forthcoming work for freight, ports and airports, looking at innovations in practice in other EU regions. This commitment for project collaboration and innovative solutions in the strategy also accords with the SRA’s Smart Southern Region initiative. Smart freight systems will be an integral part of achieving zero carbon smart cities, towns and rural areas in the Region<sup>10</sup>.
- **Decarbonisation of the Transport Sector**
  - Actions in support of developing and deploying green and renewable fuel, innovations in the HGV sector to transition to lower carbon emission vehicles, meeting the commitments of the Climate Action Plan and EU priorities for this sector through the Fit for 55 legislative package are all supported by RSES objectives for decarbonisation

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<sup>7</sup> Supported by Regional Policy Objectives 139, 140, 141, 146, 150, 158, 166, 167, 168, 170

<sup>8</sup> Supported by Regional Policy Objectives 139, 140, 141, 151, 157, 160, 161, 162, 164

<sup>9</sup> Supported by Regional Policy Objectives 41, 42, 68, 139, 140, 141, 146, 150, 166, 167, 168, 170

<sup>10</sup> Supported by Regional Policy Objectives 133, 134, 160, 161, 162 and prioritised under our Region’s forthcoming Towards a Smart Southern Region initiative.

of the transport sector<sup>11</sup>. These priorities and actions<sup>12</sup> will be supported by RSES actions for regional decarbonisation and increasing renewable energy generation.

## **2.2 Integrate the Regional Assemblies within the proposed Road Freight Forum**

**Recommendation 2:** Integrate the Regional Assemblies within the proposed Road Freight Forum.

### **Reason for Recommendation 2**

The SRA welcome the initiative of the Department of Transport to establish a Road Freight Forum as an implementation governance mechanism for the strategy, to assess policy and strategy performance, to share perspectives and address issues of common interest. We support the following especially:

- Action 2: Establish a Road Freight Forum with representatives from relevant Government Departments, Agencies and the haulage, freight distribution and logistics sector.

Supporting resilience, green transition, inter-modality and future growth of the freight sector, and road haulage as integral to that sector, is essential for the future sustainable population and employment growth of the Region.

Our support to improve the efficient functioning of freight and supply chains, support for strengthening our TEN-T network, support for connectivity to and between our ports and airports are priorities for RSES implementation. Many RSES objectives under the national and regional priorities for Enhanced Regional Accessibility, Sustainable Mobility, High Quality International Connectivity are aligned to the priorities and actions of Irelands Road Haulage Strategy 2022-2031.

As noted in the reasons for Recommendations 1 and 3, RSES implementation initiatives can significantly assist the work of central government policy and strategy implementation via the regional tier. Positive opportunities to collaborate and synergise arise.

Equally, central government backing and guidance to our regional level actions under shared priorities gives us considerable additional mandate and strength in seeking actions through our regional planning and economic development roles.

Being part of the Road Freight Form gives an opportunity to contribute to the work of stakeholders, inform stakeholders of our initiatives that support their sector and provide a regional perspective and dimension to the work of the Forum. It may allow streamlining between different actions under different strategies and plans amongst forum members.

Stakeholders of the Forum , if aware of our initiatives under RSES implementation, may identify effective approaches and collaboration in our regional level work for freight, ports and harbours, airports, regional decarbonisation, a smart region, data sharing inter alia that benefits the implementation of actions across our organisations, which supports in turn the implementation of the Road Haulage Strategy.

The SRA will welcome a reference for this potential within the final strategy and inclusion of the Regional Assemblies on the Road Freight Forum through the implementation structures of the Road Haulage Strategy.

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<sup>11</sup> Supported by Regional Policy Objectives 87, 90, 91, 92, 93.

<sup>12</sup> Draft Haulage Strategy Actions 5-17 especially.

## 2.3 Opportunity for Future Data Sharing

**Recommendation 3:** As freight and HGV sectoral data and analytics strengthens, explore the feasibility to share this data with the new Regional Development Monitor tool, an initiative of the Regional Assemblies, to assist stakeholder work on evidence-based implementation of Ireland's Road Haulage Strategy 2022-2031.

### Reason for Recommendation 3

The SRA welcome the commitment to strengthen data and analytics sharing for the freight and HGV sectors with two positive Actions led by the Department of Transport :

- Action 3: Commission a study to establish current data availability and quality, identify key data gaps and explore at a high level how these might be filled.
- Action 4: Following completion of the data audit; engage with stakeholders to identify data sources or collection points which can be used to fill the identified data gaps.

The SRA support strengthening, addressing research and data gaps and sharing data between sectors to inform evidence-based policy and decision making, as committed under the Draft Road Haulage Strategy.

A transformative initiative of the Regional Assemblies on the theme of evolving accessible data tools to assist policy and decision making of all our regional stakeholders as been the development of the Regional Development Monitor (RDM).

Recently launched on the 29<sup>th</sup> of November, the Regional Development Monitor (RDM) is a significant new planning innovation in Ireland developed through a Strategic Partnership between the three Regional Assemblies and the All Island Research Observatory (AIRO) & Ordnance Survey Ireland (OSI) (GeoHive) to provide a monitoring system and an online mapping viewer for key indicators of progress towards balanced regional development.

The RDM Indicators are focussed on Key Regional Strategic Outcomes (RSOs) and a range of related socio-economic and environmental data sources across 4 Themes:

- Our People and Place
- Our Green and Sustainable Future
- Our Region's Economy
- An All-Island Perspective

The RDM and will support the future implementation of the RSES, the NPF and *Project Ireland 2040* and provides an active on-line resource of up to data with regular updates to local authorities, public agencies and the general public.

This tool will provide a significant resource to assist stakeholders across the freight policy, planning and operation sectors. It is a tool that can integrate new themes and data sources. When appropriate, it can create relevant indicators for the freight sector in consultation with the data bodies , enabling data to be shared by stakeholders who support the implementation of the Road Haulage Strategy.

The link to the RDM is (<https://rdm.geohive.ie/>). The SRA will welcome a reference for this potential within the final strategy and engagement on this theme through the implementation structures of the Road Haulage Strategy.

**Conclusion**

I trust the above recommendations can be taken on board to help strengthen the final strategy and the implementation of actions. 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,

A handwritten signature in blue ink, appearing to read 'David Kelly', with a stylized flourish at the end.

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David Kelly,  
**Director Southern Regional Assembly**