

Sustainable Development Evaluation of Road Infrastructure Programmes and Projects

Section 2.

Assessment of Processes for National Roads Programme

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The Foundation for the Economics of Sustainability

Cad a dhéanfaimid feasta gan adhmaid? Tá deireadh na gcoillte ar lár
'What will we do in the future without wood? The end of the forests has come'

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SOCIO ECONOMICS

The Socio Economics Section of the Environmental RTDI Programme addresses the need for research in Ireland to inform policymakers and other stakeholders on a range of questions in this area. The reports in this series are intended as contributions to the necessary debate on Socio Economics and the environment.

Definition of National Roads Network

The definition of the National and Primary Roads network predates the Roads Act 1993. There are 2,754 km of National Primary Roads and 2,681 km of national secondary roads.

Distinction between Mandatory and Discretionary provisions of Part III of 1993 Act

Section 16 of the Act provides for the establishment of the National Roads Authority which took place on January 1, 2004. Section 17 sets out the provisions which *'shall be the general duty of the Authority'* and Section 18 the provision by which the Authority *'shall, at least once every five years... prepare a draft plan for the construction and maintenance of National roads.'* Section 21 provides that the Authority shall *'prepare programmes as may be required by the Minister or Government for making financial applications to the EU'*.

It is significant to note that all of these are mandatory provisions to which the NRA must comply and that no discretion, variation or derogation is provided for. Accordingly, Sections 17, 18 and 20 may properly be described as mandatory functions of the NRA.

This contrasts with other provisions of Part III, including Section 19, with regard to the preparation of designs and schemes. Section 20 with regard to making of a motorway scheme, bridge order or carry out other works; Section 22, with regard to making recommendations on the content of a Local Development Plan, Section 23, with regard to traffic management. Section 25, with regard to the borrowing of money, Section 30, on the employment of staff; Section 36, with regard to staff superannuation benefits schemes which are all discretionary functions of the NRA. While the Act provides that the NRA may undertake such functions, it does not require that the NRA must carry out any or all such functions.

It should also be noted that there is a mandatory provision applying to members of the Authority under Section 37 by which a member of the Authority, employee or consultant, *'shall comply'* with a range of requirements with regard to disclosure of interest and avoidance of any conflict of interest.

The Act, therefore, could not be clearer or more emphatic in distinguishing between those functions which are mandatory and those which are discretionary regarding the function of the NRA, Sections 17, 18 and 21 being clearly mandatory functions and Section 37, a mandatory responsibility on members of the Authority.

Significance of Section 17 with regard to 'Functions Generally of the Authority'

Section 17 requires that *'it shall be the general duty of the Authority to secure the provision of a safe and efficient network of National roads and for that purpose it shall have –*

- (a) *Overall responsibility for the planning and supervision of works for the construction and maintenance of National roads, and*
- (b) *Such other functions in relation to the construction and maintenance of National roads as are assigned to it by or under this Act.'*

This means that regardless of what other provisions apply in the Act, the NRA has overall responsibility for all maintenance as well as road construction work. This overrides the provision of Section 13 of the Act, providing that, '*subject to Part III the maintenance and construction of all National and Regional roads in an administrative County shall be a function of the Council or County Borough Corporation of that County.*' This means that the NRA has an overriding role with regard to safety, in view of its duty in the provision of '*a safe and efficient network*'; and maintenance including engineering standard of existing National roads as well as construction of new works. Section 17, when read in conjunction with Section 13, can only be interpreted to mean that the NRA has overriding responsibilities over local authorities with regard to the maintenance of a safe and efficient network. This responsibility applies equally to existing National Primary and Secondary Roads as much as newly constructed roads.

NRA Responsibility under Section 18 of the Act with regard to 'Preparation of Plans by the Authority'

Section 18 places an absolute and unqualified obligation on the NRA to '*prepare a Draft Plan for the construction and maintenance of National roads "at least once every five years."*' While provision is made for any guidelines given by the Minister under Section 41(3), the fact that no relevant Guidelines have been published does not in any way qualify this obligation. The sequence is set out as follows:

- Preliminary consultation to obtain the views of local authorities (Section 18(1)(a))
- Preparation of a Draft Plan for the construction and maintenance of National roads (Section 18(1)(a))
- Commissioning of an 'independent assessment' having regard 'to the need for efficiency, economy and quality in the construction and maintenance of National roads.' (Section 18(1)(b))
- Publish a newspaper notice that a Draft Plan has been prepared, stating time and place for public consultation and availability of copying and date for submissions. (Section 18(3)(a))
- The sending of Draft Plan to each Road Authority so that objections or representations may be made in writing before a specified date (Section 18(3)(b)).
- Considering any objections or representations and making amendments, if appropriate. (Section 18(1)(c))
- Submitting the Draft Plan to the Minister with information on all objections and representations received. (Sections 18(2)(a) and 18(2)(b))

Only at this point may the Minister approve or reject the Draft Plan or instruct that modifications be provided. Section 18(5) requires that the Authority shall annually review the implementation of the Plan approved by the Minister and submit such a review to the Minister. In Section 18(6), the Authority shall '*comply as far as possible with any Plan approved.*'

There is no provision in the Act by which the NRA is exempted this mandatory requirement. Furthermore, no time extension is provided for the five year review period. This is in contrast to the Local Government Planning & Development Acts, 1963-99, which placed a requirement on planning authorities to prepare a Development Plan every five years with a provision by which a planning authority could seek an extension of this time period from the relevant Minister. No comparable provision is contained in the Roads Act, 1993.

The Effect of Failure to Comply with Section 18

The failure of the NRA to produce, secure the adoption and comply with a five year Plan is clearly problematic.. It means that the key provision of the Act regulating the carrying out of its general duty, 'to secure the provision of a safe and efficient network of National roads' as defined in Section 17, has not gone through a rigorous process of independent assessment, local authority and public consultation and Ministerial approval for the Authority to comply with, under Section 18(6). While the NRA has, since its establishment in 1994, been carrying out a range of functions under the other provisions of the Act, the failure to prepare and comply with a Plan under Section 18 means that the preliminary, as opposed to discretionary provisions of the Act by which the Authority shall execute its function to provide a safe and efficient network of National roads has not been fully implemented. The effect of this is that there is neither an adequate national plan nor implementation strategy for road safety, road standard maintenance, traffic management, the meeting of International, EU and National legal obligations and policies on environmental protection. Also significantly, it may also be argued that there is no clear legal basis to the NDP-funded NRA/Local Authority inter-regional motorway/dual carriageway schemes currently under construction or proposed.

Responses made on Legal Cases, Legal Submissions on Lack of Section 18 Compliance to Date

To date there has been no legal judgement with regard to the failure of the NRA to comply with Section 18. The issue has been raised in a number of proceedings currently before the Courts by landowners or litigants reviewing road scheme consents granted by An Bord Pleanala.

There were court-room and affidavit exchanges with regard to a case taken by Joan Finlay against the Laois County Council N7/M7, N8/M8 Scheme. However, the case was withdrawn by the plaintiff following a confidential agreement with the defendant.

A case initiated by John Condon against South Tipperary County Council and the NRA with regard to the N8 Cashel/Mitchelstown scheme resulted in a reply in a letter of 25 April 2002 from the NRA with regard to the requirement under Section 18 to prepare a five year plan resulted in the response from the NRA: "*The Authority's activities in relation to National Roads over the period 2000-2006 are set out in the National Development Plan 2000-2006 and further elaborated upon in the Economic and Social Infrastructure Operational Programme 2000-2006*".

The issue of non-implementation of Section 18 has been raised at a number of Oral Hearings with responses made by Counsel for NRA/local authorities.

The general response made is that Section 18 is not a mandatory requirement on the NRA; and that, in any case, failure to comply with Section 18 does not affect the legal status of any individual CPO which is initiated in the name of a Road Authority implementing provisions in its Development Plan.

Another general response is that the current programme is Government Policy, as set out in the National Development Plan, 2000-2006 and therefore this supercedes Section 18.

Consideration of Legal Status of National Development Plan, 2000-2006

The National Development Plan (NDP) is not based on any Act of the Oireachtas. It is not a registered or legal entity and has no legal or statutory status. It is a name of convenience put on a projected Government spending programme for a defined time period. It is not subject to any provision for public consultation, such as that provided in Section 18(3)(a) of the Roads Act.

There is no evidence that the preparation of the National Development Plan gave any consideration to the provision of Section 17 or 18 of the Roads Act, 1993 and the NDP was coordinated by the Cabinet subcommittee and infrastructure and relied largely on a list and priority rating of infrastructural development for its tabulation on a regional basis by Forfas prepared in 1999. Examination of this Forfas document does not appear to reveal any consideration for overall concern for the provision of a 'safe and efficient network of National roads.'

The relevant provisions in relation to National roads are contained in Section 4.10 of the NDP. However, these refer only to a new build development strategy. While there is a provision for a high priority to the safety of road users in the design and construction of road projects, this relates only to new projects and no implementation strategy for enhancing road safety on the National road work as a whole is provided for. The NDP cannot be regarded as a substitute for the Plan required under Section 18 of the Roads Act to implement the functions of the NRA under Section 17 since it does not provide any overall strategy for the development or management of the road network, including the management and safety of existing roads.

Does the NRA have the Coherent Strategy to Regulate the Performance of Its Section 17 Definition of Function?

The NRA may argue that the absence of Statutory Compliance by the NRA with its obligation to have a Five Year Plan under Section 18 in executing its functions as defined by Section 17 has been met by other policies or statements.

Examination is made of documents produced by the NRA including those published on its website to determine this. No document individually can be defined as reflecting a statement of its Section 17 and 18 obligations. Accordingly, assessment is required of the degree to which the cumulative documentation of different status produced by the NRA, and, in particular, Policy Statements and Guidelines, amount to compliance with its obligations under Section 17 and 18.

Network

There is no Policy Statement definition of the NRA's overall responsibility for the provision of the safe and efficient network of National roads. There is no safety traffic management or operational strategy for the management of the network as a whole.

Construction Standards

The NRA relies largely on the 1992 UK Design Manual for Roads and Bridges, with modifications introduced for Ireland in 2001 and subsequently.

Road Surface Standard

Information has been sought on PSV (polished stone value) standards. The PSV standard is an important consideration in reducing skid risk in accident situations. However, there is no information to establish effective national monitoring of PSV

standards on a national basis, since requests under the Access to Information on the Environment Directive, with regard to National Secondary roads in counties Sligo and Mayo, has not resulted in the provision of the required information from Mayo and Sligo county councils to establish satisfactory PSV values.

New Construction and Improvement Programme

The NRA website states:

“The NRA’s road development programme forms part of the Government’s overall strategy for the improvement of national infrastructure, which is contained in the NDP 200-2006”.

The NRA was established on 1 January 1994. It was only in 1998 that it published any strategic document setting out an overview of existing road capacity and performance and recommendations for road construction and improvement. *The National Roads Needs Study, 1998* was based on the principle of catering to the traffic increase projections available at the time. It did not address the obligation which Ireland endorsed through Kyoto in 1997, to reduce Greenhouse Gas emissions. This strategy of catering to vehicle increase projections then available was superseded by *National Climate Change, Ireland, 2000*, which recommended a range of measures to reduce transport-generated Greenhouse Gases, including demand management measures to reduce traffic levels and modal shift measures to move passenger and freight from road to rail.

The traffic levels projected in the 1998 are now being exceeded as a result of a combination of population increase and economic growth beyond the projections available in 1998 and levels of dispersed car-based sprawl. However, this does not validate, either the recommendations contained in the 1998 Study or the increased or higher capacity road projects in the *National Development Plan, 2000-2006*, or *Transport 21, November, 2005*.

Safety

The NRA has no published Safety Strategy for the existing road network.

The NRA has been repeatedly arguing that the existing National road network is unsafe because of a lack of carriageway separation and that the means to resolve this is the construction of new grade-separated dual carriageways or 2+1 roads, or retrofitting of existing roads with 2+1 in certain cases. After the 2004 N8 County Tipperary crash on what was a long stretch of improved road between Cahir and Mitchelstown, the NRA argued that improved roads and in many cases in which the NRA had been involved in improving, were now among the most dangerous in the country because of the risk of speeding and collision between meeting traffic on long straight stretches of road. The NRA was responsible for endorsing the design of the Fiddown/Piltown by-pass, County Kilkenny, which it has subsequently accepted to be an unacceptable safety risk and is now retrofitting this section of road as a 2+1.

On national roads other than those with dual carriageway or motorway schemes in place, the NRA is abandoning its policy of endorsing single carriageway roads in favour of dual carriageway; or in the case of the Castleblayney/Clontibret by-pass, 2+1, in contrast the Carrimacross by-pass which is single carriageway standard. The most recent announcement by the NRA is that it is no longer favourably considering 2+1 proposals for Greenfield, new road/by-passes; instead

recommending full dual carriageways. Any further 2+1 development is likely to be restricted to retrofitting of existing roads.

While the entire NRA dual carriageway programme has been justified on the basis of the enhanced safety through carriageway separation, this has been undermined by the lack of provision of a central crash barrier, so that the NRA is now retrofitting dual carriageways with central median crash barriers.

In the "Road Safety and Research" section of the NRA website, it is stated that: "*The better safety record of motorways and dual carriageways compared with the sections of two-lane National Road they will replace, has the potential to reduce road accident fatalities by over 50 persons annually with the planned completion of 900km of motorway and dual carriageway by 2007 under the National Development Plan*".

The NRA is claiming that 50 lives per year will be when the 900km of motorway dual carriageway under the NDP 2000-2006 is completed and this will "*reduce the number and severity of accidents occurring on the existing network of National Roads*". However, more than 4,400km of national roads will remain as single carriageways and in the case of new motorways, the original national roads will remain N designated.

The most recent available information on accident site mitigation relates to 418 schemes completed during the period of the Government "Road to Safety" strategy 1998-2002.

Evaluation of 128 Programme schemes completed in 1994 and 1995 revealed a 20% reduction in accidents.

Maintenance of Safety and Operational Integrity through Restriction of Turning Movements

The May, 2006, 'Policy Statement and Development Management Access to National Roads' Section 1.5 '*An analysis of road accident data indicates that more than 50% (33 665) of all injury accidents reported on Irish roads for the period 1996-2004, occurred at junctions or involved turning movements onto/off roads. The fatalities in these accidents totalled 964 or 26% of overall road accident fatalities (3 707) recorded during this period.*' However, there is a lack of data on injuries or fatalities resulting from turning movement collisions resulting from traffic from entrances onto roads other than road junctions on National roads.

However, the data in the most recent available annual published "Road Collision Facts 2004 does not include an entry for collisions involving vehicles entering onto roads from entrances other than road junctions.

Enforcement of Compliance with Policy Provisions for the Protection of National Roads

Since 1982, the Department of the Environment & Local Government through the issue of Circulars, has required local authorities to maintain the safety and operational integrity of national primary and secondary roads, through curtailing development and new entrances outside speed limits. When the National Roads Authority was established in 1994, this policy was continued in Circular NRA1/1995 and subsequent circulars to date. The Prescribed Function of the Minister for the Environment to be referred planning applications affecting national roads, and

function to take appeals against non-policy compliant local authority Decision Notifications, was also transferred to the National Roads Authority.

The Department of the Environment, Heritage & Local Government continuously emphasises the policy requirements to protect the safety and operational integrity of national roads, most recently in the DOEHLG Rural Housing Guidelines.

Notwithstanding this, both the Department of the Environment and, since 1982, the NRA failed to take action to prevent local authorities from permitting development outside speed limits on national roads, prime examples being the N22 between Tralee and Killarney; the N69 between Limerick and Foynes; the N59 in County Mayo; sections of the N6, particularly traversing Co Roscommon; and the N 15 between Derry and Letterkenny.

One of the prime national examples of a road where safety and operational integrity has been undermined is the N22 between Tralee and Killarney, in many cases with houses which became large guesthouses, in many cases as result of Section 4, later Section 140 Motions in contravention of management advice.

The Dept. of the Environment should bear responsibility for not taking action against development permitted by Kerry County Council before 1994. However the NRA systemically failed to take any effective action until 2004 when its first appeal was taken on a particular case. Accident statistic information revealed that 15% of accidents occurred at private accesses.

In March 22 2004 the Irish Times referred to a report to realign N22 finding that widening would require 17 house to be demolished and affect 140 properties. Instead the NRA was proposing a new road at a cost of 90 million.

When asked why the NRA has failed to appeal inappropriate development along the N22 the response was "*We're a small body and we wouldn't have the resources*"

Despite taking its first appeal in Co Kerry in 2004 and a small number of other cases, subsequently, the NRA is still not taking consistent action to prevent hazardous development from being permitted on national roads, by local authorities. The NRA has also failed to take action against development plan amendments introduced by Mayo County Council in 2003, downgrading control of national roads including a large portion of the N59.

A new problem is occurring along large areas of existing national road where to date there has been some degree of planning control. New dual carriageways are either under construction or being proposed without realising that the abandonment of such control on the old national road would render the new dual carriageway ineligible for upgrading to motorway designation, e.g. Kildare to Portlaoise.

There is no data analysis in Ireland to establish the level of accidents and fatalities which have occurred as a result of collision between passing vehicles and cyclists or pedestrians entering or existing a house or other development on a national road outside a speed limit area and passing traffic on that road. A documented case of such an accident was won on the N84 outside the 100kph speed limit at Ballyhean, Co Mayo in March 2003, where a vehicle driven by a family exiting from the house crashed into a vehicle on the south moving lane, resulting in two fatalities.

The May 2006 publication again reiterates the Policy contained in Circular 1/95 as well as DOE Policy since 1982. However, there is no evidence that any improved or

effective procedures have been put in place by the NRA to protect the safety and operational integrity of National roads including new roads being developed or improved to motorway standards.

Prior to 2004, the NRA did not take any action by means of appeal to An Bord Pleanála against local authorities permitting inappropriate development affecting National roads. While there has been a progressive increase in the number of appeals (a breakthrough appeal in Co Kerry on the N22 was taken in 2004) this in no way reflects the level of inappropriate permissions being granted by local authorities. The difficulty is that there is no means of establishing the number of such permissions since the only bodies to have the information would be the individual local authority and the NRA. Analysis of a number of recent appeal decisions suggests the NRA did not exercise its legal responsibility for development other than one-off housing, as shown by the following examples:

- 1 Hotel on N7 currently under upgrading to motorway standard, at Kill, Co Kildare. An Bord Pleanála refused development on the basis of National road Policy.
- 2 Hotel on N89 outside Crossmolina, Co Mayo, incorporating nightclub. An Bord Pleanála refused development on the basis of National road Policy.
- 3 12 houses with entrance onto local road adjacent to N59 junction at Carballa, Co Sligo. Refused permission on road safety grounds.

These appeals only arose because they had been referred to An Taisce for reasons of proximity to archaeological monuments or other considerations in the Regulations, rather than road safety.

There is a particular accident statistic concentration on males between late teens and late 20's age, travelling from nightclub/late night bar venues. Two of the above applications for new development directly existing onto the new hotel development to motorways/dual carriageways/roads where the maximum speed limit applies, could be described as probable negligence by the NRA of its Section 17 functions.

Enhanced Risk to Regional Roads

The effect of current road investment and development trends is placing increased development and traffic pressure on Regional Roads for which the NRA has no remit. Repeated policy guidance, most recently in DOEHLG Rural Housing Guidelines, is emphatic in the need to maintain the safety and operational integrity of regional as well as national roads. It should also be noted that the maintenance and enhancement of national as well as regional roads, is an objective of both National Spatial Strategy Ireland, 2000. Section 3.7.1 on "Regional Roads" identifies the "*key role of regional roads*". The National Road Programme is generating increased pressure on Regional and local feeder roads.

A prime case affecting the safety and operational integrity of a regional road is that relating to the R414 between Rathangan and Monasterevin to the south in Co Kildare. This has been exacerbated by the increased traffic and development pressures resulting from the M7 motorway dual carriageway which has extended the pressure for car-based commuter development on locations feeding into the M/N7 corridor, including Rathangan. The knock-on effect of this, along with the provision of major sewerage expansion in Rathangan, is to increase the pressure on the regional road connecting it with the regional road and the N7. Because Rathangan is not in a rail corridor, and is not served by any significant public transport, it will generate

disproportionately high levels of car movement and mobility, particularly on the regional road connection to the N7.

Control of Commuter/Local Traffic on National Roads

The current NDP-funded NRA/local authority road schemes are justified on the basis of the General Objectives set out in Section 1.1 of the National Development Plan 2000-2006. The strategic objective for National Roads and transport objectives is set out in Section 4.10 of the NDP *'economic development and balanced regional development'*. The roads are accordingly not for saturation with local and commuter traffic. The May 2006 *'Policy Statement and Development Access to Local Roads'* also requires local authorities to ensure that Development Plans are amended to *'reflect and safeguard the strategic role of interchanges in catering for the scale and efficient movement of inter-urban and inter-regional traffic.'*

Section 3.3.5, 'Traffic & Transport Assessments' of 2006 Guidelines only now contains the first formal statement by the NRA that the implications of traffic generation development in the wider catchment area of National Roads in referring to the fact *'certain development proposals which generate significant additional trips/travel including road traffic, with potentially seriously implications for National roads and adjoining local roads 'the Authority favours the preparation of a Traffic and Transport Assessment in such cases so as to fully address the implications arising and to assist the evaluation of the planning application.'* However, instead of suggesting that development, for example of car-dependent housing or employment location development may be inappropriate, it implies that matters can be addressed through *'changes to the road and/or junction layout and capacity in order to address road safety concerns and maintain a satisfactory level of service for road users.'* This does not address the issue of cumulative traffic generation, road vehicle development in the immediate and wider catchment areas of road corridors, including the cumulative effect of one-off housing.

The National road construction programme is predicated on the principles of enhancing inter-regional reduction of travel times, reduction of congestion and enhancement of safety. Inter-regional road vehicle travel times outside urban centres have been significantly reduced. Growth in road vehicle use, travel distance generation and road vehicle mobility dependence is progressively increasing urban congestion problems. Road safety benefit through grade separation through new motorways, dual carriageways/2+1 new roads/upgrades is likely to be negated by increased traffic pressures on roads feeding into National roads, such as the R414, Rathangan/Monasterevin (see section on National roads and Appendix 1).

The time saving objectives by the NRA including 56m from Dublin to Cork are predicated on 97 kph speed levels being achieved. This does not address travel times from a range of origin and destination points in and around the relevant urban areas and the capacity of existing urban road networks within ring road areas to accommodate the traffic growth levels predicted for National Roads .

The most recent available transport figures under a range of headings relating to Ireland are summarised in an Irish Times Article of 18th July 2006:

- Average car driven 24,000 km per year 70% higher than France or Germany and 30 % higher than US
- Number of people driving to work jumped 16 points to 55% between 1991 and 2002

- Average length of commuting journey increased from 11 km in 1996 to 16km in 2002
- Number of cars increased by two thirds from 939,022 to 1,582,833 between 1994 and 2004
- Number of HGVs and commercial vehicles nearly doubling from 135,809 to 268,082 between 1994 and 2004
- Decline of market share of rail freight from 5% in the 1980s to less than 1% today
- SUVs accounting for 8 % of new car sales in Ireland
- Transport accounting for 40% of Irelands CO2 emissions, increasing at 10% per year.

More difficult to quantify is the wider impact of car dependent urban sprawl which ranges from car based housing on urban fringes, dormitory commuter development in towns and villages for people employed in and around larger urban centres and one off housing. While the NRA may argue that this is a land use and planning issue outside its remit, urban sprawl directly affects the operational capacity and travel time targets for inter urban journeys on national roads and potentially undermines the safety benefit on which the NRA is justifying the current road programme, by making feeder roads in urban sprawl catchment area more dangerous.

There is no evidence of strategy or plan by the NRA to address the effect of these trends on National Road time targets, travel time targets, overall National Road safety targets and National land use and environmental policy.

Service Areas and Rest Areas

The NRA has only in 2006, produced a Policy Statement on '*Provision of Service Areas and Rest Areas on Motorways and High Quality Dual Carriageways*', recommending the provision of such facilities at intervals of approximately 50/60 km and 25/30km respectively. This has occurred only after the entire inter-regional road projects between Dublin and the main urban centres have been approved and most of the M1 along with large sections of other schemes constructed. The NRA is now understood to be in coordination with local authorities to address the issues raised.