



Submission to the Department of Transport, Tourism & Sport on
A Strategic Framework for Investment in Land Transport
Submission from the Dublin Chamber of Commerce
20 October 2014

Executive Summary

It is necessary that the country assess its short-, medium-, and long-term transport needs. Dublin Chamber welcomes the opportunity to input into the Department of Transport's Strategic Framework for Investment in Land Transport and believes that we must quickly prime a pipeline of projects to address the forthcoming congestion problem in Dublin.

There are many encouraging signs of lasting and deep recovery in the Dublin economy. Dublin is – and will continue to be – the main driver of the wider Irish economy in terms of employment, GDP, and tax revenue. However, it is vitally important that Ireland does not take for granted Dublin's ability to compete internationally for business. Land transport is a key component to future competitiveness.

Dublin Chamber is encouraged by recognition in the draft framework of the value of capital investment in transport to the overall economy and notably job creation.

However, Dublin Chamber is concerned by "the scale of the gap between available funding levels and the level of investment that is necessary to maintain the existing transport network in adequate condition". The transport capital envelope for Dublin, which the National Transport Authority puts at approximately €150m p.a., is significantly lower than an international city region needs. Benchmarking against London (on a per capita basis) and Manchester illustrates the level of underinvestment. These comparisons indicate that Dublin's investment must be doubled or tripled to keep pace.

The Chamber will develop a prioritisation of Dublin projects on the completion of this comprehensive model. Given the limited funding envelope (even if doubled), capital investment prioritisation is crucial. A single major project that would consume the entire capital investment budget would not meet the concerns of multiple travel corridors near or at capacity.

The planned levels of investment will likely produce little more than maintenance and preservation of the existing network with only slight improvements. This point is supported by the 2012 accounts of National Transport Authority which reported an increase in fixed assets of only €2m. The framework must ensure that land transport is ready to meet future needs, which keeps Ireland's cities competitive internationally. For example, Budget 2015's €2.2bn on social housing will require supporting funding to be put in place to meet the additional transport demand created.

To move quickly, Dublin Chamber will assist the Department and other bodies by producing its own capital investment prioritisation study, once a comprehensive study of the Dublin transport model is completed by the NTA & Dublin City Council later this year.

Dublin Chamber is concerned that if unchecked, Dublin is facing transportation problem that will impact its competitiveness and consequently negatively impact on tax revenue, the economy and jobs.

The Importance of Dublin

Dublin City and the Greater Dublin Area (GDA) account for roughly half of all national output and two in every five jobs in the country. Given the number of people working and living in the GDA, and the links between business, transport and educational facilities in the region, it is appropriate to consider the needs of the region as a whole.

There is an implicit assumption in many Government strategies that Dublin can look after itself. This thinking is copper-fastened by a view that Dublin has grown disproportionately to the rest of Ireland and that public policy should seek to arrest the scale of development in Dublin. This view fails to recognise the role of capital cities in general as the engines of regional and national growth.

The EU Commission's policy on cohesion and cities articulates that city-regions are drivers of economic development, creating growth, innovation and employment. Cities are the homes of most jobs, businesses and higher educational institutions and are the key actors in achieving social cohesion. Cities are the centres of change, based on innovation, entrepreneurship and business growth. The GDA plays this role within the Irish economy.

The GDA has been a major driver of growth for the Irish economy in recent years and has also become a significant node of global economic development. Ireland is the fourth most important destination for US foreign direct investment in the world, with the GDA accounting for about half of Ireland's investment allocation. Dublin is one of the world's great cities, ranked number 34 in the 2014 Mercer Quality of Living rankings. It is far more than an administrative capital – it is the prime focus for business, finance, the arts, media and more. A dynamic, cosmopolitan and diverse city, it helps drive growth in the rest of the economy.

The GDA has a formidable mix of high value-added manufacturing and service businesses, including those in the financial and business services sector, ICT, pharmaceutical, transport and logistics, and food and drink sectors. Large parts of the region's businesses are directly linked to the international economy and are, therefore, under constant and strong pressure from competitors in other countries. Sustaining the GDA's position requires continued and substantial investment in the social and economic infrastructure of the region, to a greater degree than anywhere else in the country.

The Dublin Chamber supports the Government's goal of regional development. We believe that further investment in, and support of, the competitive position of the Greater Dublin Area will support this goal. Ireland needs the GDA to be a magnet to attract high value investment, which is needed if the economy is to remain prosperous. The goal should be to provide an environment where world-class companies, which are capable of competing on a global basis, can emerge. In the majority of cases, Dublin does not compete for private investment with the rest of the economy – it competes internationally.

While the Irish economy may be successful today, the GDA is facing increasingly strong competition from cities and regions. A weakening of Dublin's competitive position in the international economy cannot be compensated for by other parts of Ireland. There should be no illusions about this; any brake on Dublin's success would have a severe impact on the whole national economy. Underperformance by Dublin would not be offset

by growth in other Irish towns and cities, but rather in other urban hubs in Europe or further afield.

The GDA must beat its competitors in all areas where competitiveness matters.

Ultimately, strong levels of growth without sufficient supporting investment will be the root cause of many of Dublin's biggest problems such as congestion, high prices and environmental issues. This was the case during the previous economic boom. A repeat of such failure will cost Dublin, and Ireland, business.

Preparing for Population Growth

In the coming years, population growth will place excessive demand on critical pieces of infrastructure, particularly transport.

It is vital that economic infrastructure is put in place ahead of demand, as has been argued by the National Competitiveness Council and others in recent years.

The population of the GDA has grown rapidly since 1990. Current and future transport demand is closely linked to population distribution and growth. Dublin City and County has a population of 1,273,069, while 1.8 million people live in the Greater Dublin Area, comprising Dublin and the counties of Meath, Kildare and Wicklow. This means that the GDA currently accounts for 39% of the State's population.

In 2005, the CSO estimated that the population of the Greater Dublin Area would reach 2.1m persons by 2021, some 10 years earlier than was previously forecast. According to the more recent figures (a population of 2.1m by 2021), it appears that population growth in the GDA has been seriously underestimated. The continued growth in net inward migration and rising birth rate suggests that even the latest CSO central projection will be exceeded.

Past development plans have been characterised by serious underestimations of population growth. For example, the Dublin Transportation Office's projections for transport demand in 2016 were reached in 2003.

It is important that we learn from the past and plan for population increases that come in above current forecasts.

Many of the major transport projects required in Dublin will take a long time to come on stream (Dart Underground, etc). Therefore, it is vital that a plan for short- and medium-term solutions are put forward and prioritised. Short- to medium- term solutions should also focus on integration and accessibility, such as improved traffic management around the city and an extension of initiatives such as the Leap card.

Dublin Chamber believes that short and medium plans need to be formulated urgently. Indicators show that car sales are on the rise, employment is growing and the continued economic recovery – led by Dublin – means that problems will intensify for people who need to get in and out of Dublin for employment.

In this context, it is worth noting the previous patterns of transport mode for the Dublin canal cordon. The table below summarises the annual change. The high proportion of private car transport remains a critical issue to balance. The emphasis for commuters is to ensure that public transport (or alternatively walking/cycling) is a viable alternative to private car. Equally, demand management that negatively impacts on private car use for shopping in the city centre will cause further problems.

Mode	2006	2007	2008	2009	2010	2011	2012	2013
Bus	59,874	57,201	60,438	56,168	50,420	54,251	52,007	56,177
Rail	33,534	35,692	32,324	25,723	23,580	22,932	23,999	24,969
LUAS	9,029	9,171	9,242	8,776	9,111	9,949	10,014	10,835
All Public Transport	102,437	102,064	102,004	90,667	83,111	87,132	86,047	91,981
Car	76,850	71,597	67,732	71,043	71,978	69,681	68,626	68,072
Taxi	1,453	2,154	1,930	2,739	2,260	2,674	3,271	3,111
Walk	17,114	18,594	18,360	14,618	15,092	14,551	17,070	17,495
Cycle	4,839	5,676	6,143	6,326	5,952	6,870	7,943	9,061
Goods	2,291	1,445	1,223	1,087	993	1,176	1,099	1,045
Motorcycles	2,395	2,429	2,375	2,060	1,656	1,485	1,425	1,423
Total Person Trips	207,379	203,959	199,767	188,540	181,042	183,569	185,481	192,188

It is worth noting (in the context of the above table), the overall importance of bus followed by heavy and light rail in the movement of people into the city.

Return on Investment

This public consultation encourages consideration of “the evidence base on the link between economic growth and transport investment, and the return on previous investment in an Irish context”.

The Chamber’s research on international trends in transport investment (D21 Transport Report 2012) supported the conclusions drawn from the Department’s background paper 7 (“The Regional Development Impacts of Transport Infrastructure: A Literature Review and Policy Implications” by Edgar Morgenroth). Greater density does indeed increase productivity gains from transport infrastructure.

The background paper draws attention to flaws in certain parts of the NSS in regard to creating hubs instead of urban areas. “Agglomeration benefits are restricted to the contiguously built up area of an agglomeration. Linking centres that are some distance apart such that they do not form a contiguous conurbation is therefore unlikely to result in any additional scale benefits. Thus, transport infrastructure linking two centres will not generate additional agglomeration economies but will allow for reduced transport costs and thus increased commercial links between the centres.”

The Chamber accepts that funds available for investment are extremely limited and, therefore, must be used to create the greatest economic benefit for Ireland. The returns, in terms of tax revenue, on these investments need to be recognised as such then re-invested to ensure future growth.

Businesses Must Be Consulted on Changes

Dublin Chamber believes no amendments should be made to the current traffic patterns within the city centre without extensive and open consultation and engagement with the business community. This should take place prior to any plan being put forward for consideration.

Transport policy needs to encourage the continued development and expansion of transport systems and use of the public transport network to reinforce Dublin's connectivity with international markets and the rest of the island, and to ensure ease of access around the Dublin region.

Dublin is in a good position to build upon past investment that has seen the emergence of a more modern road network, improved bus and rail services and infrastructure, and the implementation of Real Time Passenger Information (RTPI) and integrated ticketing.

Integration and Accessibility

The successful introduction of the Leap card has produced greater efficiencies in public transport travel and enhanced user experience. Going forward, further payment integration is required on all facets of transport including Dublin Bikes, car parks, park & ride facilities, and tolls.

Dublin Chamber would like to see technology further embraced to include the use of contactless bank cards and/or mobile phones for payment of public transport journeys.

Road Infrastructure

Poor vehicle access, vehicle circulation and congestion continue to be matters of concern for businesses in the Dublin region. Dublin Chamber believes that a number of measures should be considered to address these concerns.

The East Link Bridge continues to operate under capacity. More must be done to encourage increased usage of the East Link Bridge, such as incentivised tolling for drivers who use both the Port Tunnel and the East Link. Dublin Chamber would welcome confirmation from Dublin City Council on its plans for the East Link Bridge when it reverts to the city's ownership next year.

The Port Tunnel is severely underutilised and measures to encourage greater car usage, such as toll reductions and the extension of the Port Tunnel under the Liffey to improve access to the south Docklands, should be considered. Finally, the long term development of Dublin City Centre requires that additional capacity generating measures should be considered, such as the completion of the M50 ring road with the overall construction of the Eastern Bypass.

Public Transport

Government should continue to support the development of public transport in Dublin. When delivered, the LUAS BXD, Metro North and Dart Underground projects will considerably enhance the tourist experience and provide the backbone of an integrated transport service. Dublin Chamber recommends that the programme for public transport development in Dublin must be maintained.

Government must support the development and enhancement of Dublin and Ireland's air and sea port access to ensure the customer experience and service is world-class.

Dublin Chamber believes it important to note that car-based shoppers, diners, tourists, concert and theatre goers are a critical component of Dublin city's ecology and economy. Failing to acknowledge the role that private vehicles play in the life of the Dublin City Region will be detrimental to the retail, leisure and tourism sectors, and could lead to Dublin city becoming a donut city with an empty city centre.

Dublin Chamber sees that buses will continue to be the predominant public transport mode in terms of network coverage throughout the Greater Dublin Area. Therefore, that the priority in the transport hierarchy be based on actual usage as well as preferred usage.

Dublin Chamber recognises the opportunities available through Bus Rapid Transit (BRT). The Chamber will be making a submission on the BRT to the National Transport Authority at the end of November 2014. The BRT offers a short-term solution on busy routes such as those operating between Dublin Airport and Dublin City Centre. However at the time of writing, it is not clear that the BRT is a long-term solution for these routes, or for the GDA as a whole. Our submission will seek to analyse the BRT's benefits and costs, which will be forwarded to the Department for its information.

Essential Developments

Dublin Chamber has communicated its concerns regarding the lack of a single model for traffic movements in and around Dublin post-Luas Cross City. The proposal of particular transport projects is difficult without such a model in place. The impact of the proposals might have is not fully understood (e.g. BRT routes on existing city centre bus services, implementation of Docklands traffic improvements, changes to Quay traffic routing, revised tolling of EastLink & Dublin Tunnel, etc).

Upon the completion of this comprehensive model, the Chamber will develop a prioritisation of Dublin projects. Given the limited amount of money available to spend, prioritising which projects are most needed is crucial.

In addition to the projects listed below, the Chamber will review projects in various areas such as the Docklands with the Eastern Bypass and a bridge to connect Sir John Rogerson Quay to EastLink.

- Luas Cross City

Dublin Chamber has been a long-time supporter of Luas Cross City. We believe that it is a vital 'missing link' for public transport in the Dublin region as a whole. Luas Cross City will join the Luas lines but also link the north and south side of Dublin City Centre in an important way, which will improve access for commuters, shoppers, and tourists.

It is estimated that the new line will help create an additional 8 to 10 million trips on the Luas network annually. A cost/benefit analysis of the project conducted by the Railway Procurement Agency (RPA) calculates that its net economic value will be €512 million.

Better and effective integration of our transport network provides passengers with greater travel options and increases the value of the public transport network as a whole.

- Airport Rail Link

Planning permission for Metro North was granted and made operational at the end of 2010. As long as major work is commenced, not necessarily complete, by 2020, the planning permission remains viable.

- Dart Underground

Dart Underground was granted planning permission in December 2011. Dublin Chamber believes that this decision was an important step in addressing the future of the transport network in the Dublin region. Despite Government's decision to defer the development of Dart Underground, it is still important that planning for the project continues so it can be brought to a state of readiness for when funding eventually becomes available. This valuable and necessary line would increase the capacity of the rail service by 70 million passengers per year.

- Phoenix Park Tunnel Link

Heuston station lies some 3km from the commercial core of the city and a distance greater than 3km from the area of highest density employment in the south eastern quadrant of the city. Hence, the huge numbers of passengers currently using the Kildare line and wishing to access the commercial core of the city by public transport have to break their journey by transferring to bus or LUAS.

In the absence of Dart Underground, Dublin Chamber welcomes the measure of opening the Phoenix Park Tunnel to passenger rail services.