

Submission by Dublin Chamber of Commerce to Dublin City Council in Relation to the Dublin City Centre Transport Study Consultation Document

The following document is the Dublin Chamber's response to the Dublin City Council and National Transport Authority's (NTA) joint Dublin City Centre Transport Study.

- **The need for a strategic study.** The Chamber welcomes the support of the Minister for Transport, Pascal Donohoe TD, and indeed the work of the City Council and NTA to develop this study on the recommendation of the Chamber. The overall objective of the finalised plan has to be to maintain Dublin City Centre as vibrant and accessible to all.
 - As the economy grows and as more people join the workforce in Dublin, the Chamber accepts that evolution is required in the way in which people access and interact with the city centre.
 - Dublin Chamber, as part of its mission statement, is committed to creating a successful Dublin and we believe that an a world class transport system is core to achieving this goal.
- **Medium term vision needed.** The need for this study for businesses was to provide a medium term blueprint for the future of the city's traffic plan.
 - From the Dublin City Council and NTA perspective, we are keenly aware that there has been, and continues to be, a lack of investment in transport. This has hindered the advancement of public transport options that offer a reliable, viable and compelling alternative to the private vehicle, and necessitated the actions outlined in the Council/NTA plan.
 - From a business perspective, there is a need to ensure that sufficient time is given to businesses to adapt and get ready for any changes made in relation to transport in Dublin City Centre. The Council and NTA should be working towards a 5 year glide path as this represents the average investment period. This will allow businesses enough time to plan appropriately for any changes.
- **Misalignment of objectives and solutions.** The City Centre plan is necessitated by rising commuter peak traffic and the addition of Luas Cross City. The Chamber is concerned that the plan will unnecessarily impact on and penalise those business that currently rely on clients and customers who use private cars outside of peak hours and who do not impact on Luas operations.
- **The next iteration of the study.** The Chamber believes that the first draft of the study provides a useful start based on the data currently available, but contends that information needs to be provided in the next iteration of this study as many businesses remain confused about the nature of the proposed changes and the potential impacts on their businesses. The next iteration of this study should include the following:
 - **Widen the scope of the area:** The primary focus on the area as mapped out in the study should remain at the core of this study. However, the impact of this plan should ripple out much further as the focus is on moving through private vehicle traffic away from the city centre core.
 - **Assessment of demand, capacity and behaviour:** The Chamber recognises that the bulk of this work has been prepared as part of the study but would suggest that it could be developed in the following ways:

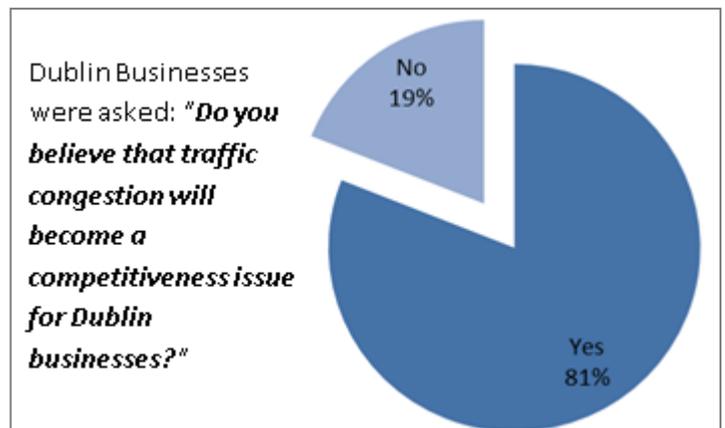
- **Usage by mode throughout the day:** The main data provided in the study relates to morning peak traffic. Yet, the impact of the initial study options would have a 24/7 impact on traffic. More data on this is required to assist in making a full decision.
 - **Compelling alternatives to the private vehicle:** The plan should state how people diverted from private vehicles will be able to access the city centre - i.e. what modes of transport will be available to provide a compelling alternative to the private vehicle. In particular, consideration must go to determining whether the public transport offering is adequate in the area covered by the plan, in terms of capacity, reliability and attractiveness to the would-be user. In some cases, initiatives will need to incorporate capacity enhancements and efficient traffic flow management on the routes to which the traffic will be diverted. Increased capacities and efficiencies should be agreed before the plan proceeds. Where new infrastructure is needed, options which offer the best return on passengers moved should determine priority.
 - **Current capacity:** The traffic capacity problem predominantly relates to available road space. For those assessing the study, it would be valuable if the current road capacity data are made available as this would help to verify the points made in the study in a tangible way.
 - **Alignment with public transport strategy:** The commitment of alignment to the NTA Transport Strategy in the plan is welcome. However, in the absence of the Strategy being made public, it is difficult to comment on the success of such an alignment at this stage. Included with this submission is the Chamber's Submission to the NTA Transport Strategy.
 - **Behaviour changes:** What impact will the proposals have on the public (commuters, shoppers, tourists, business owners, etc)? The current behavioural analysis is canal cordon based and provides annual trends.
- **Outline of assessment methodology:** The first draft of the study is easily accessible in terms of the writing style and does not get overly mired in traffic engineering information. The analysis in the study needs to develop from a methodology which would be derived out of the Council's 6 principles. The principles in themselves are not measures, but subjective guides. Therefore, a more objective approach is needed and more detailed estimates need to be contained in the next draft of the study.
 - **Intended outcomes and impact on principles:** The study should, as much as possible, provide estimates about the intended outcomes of any changes. The first draft of the study contains no clarity on the specific gains or loss of key metrics that relate to the Council's 6 principles.
 - **Rationalisation:** This term is applied throughout the study and carries with it the potential to impact on a business. Failure to apply objective criteria would lead to criticism on these grounds.
 - **Case for Public Realm improvements:** Contained within the study are a number of changes that are related to the City Council's public realm strategy. As part of the study, the priority and assessed value to the community that it would serve should be outlined. This would allow for easier assessment and prioritisation. Such assessment should be based on the ex-ante analysis of other public realm projects in Dublin City. Carrying this out would ensure that the findings are more objective.

- **Identify a set of feasible options to assess:** The study would benefit from the inclusion of more than a single option for discussion. Comparing and contrasting the pros and cons of each approach would give stakeholders a chance to tease out the issues that they have with certain aspects. They would also be able to more easily identify solutions with a view to developing the best possible plan. Suggested below are the types of options which could be included, based on the Chamber’s engagements with members to date.
 - **The status quo model:** The study needs to include a clear assessment of what the Council and NTA would see happening if things were left as they currently are. More detail must be provided than what is currently in the study, which says: “by 2023, the transport network of Dublin City will be required to cater for a further 42,000 journeys each morning, an increase of almost 20%. It is not possible to cater for this increase by the private vehicles alone, as if even 20% of these additional trips were made by car it would represent an increase of 8,500 cars on the road during the morning peak, effectively returning the traffic volumes and congestion in the city to levels last seen in the early 2000s.” While the Chamber would agree that maintaining the status quo is not a viable option, it provides a baseline by which to assess other proposals.
 - **Only changes to accommodate Luas Cross City:** Several businesses have noted that they are confused by what elements of the plan are based on the Railway Order and what is actually being proposed. It is worth stating that where Railway Order conditions are now found wanting, the Chamber would support the Council in proposing amendments to An Bord Pleanala as necessary to correct such issues.
 - **Fundamental change to how traffic flows:** It has been suggested by our members that the study should review options which would be more fundamental in the way in which traffic moves through the city, as opposed to adapting and adjusting routes as they exist currently. It would seem timely to perform such an exercise.
 - **Other proposals:** On the basis of the feedback of this first consultation, the Council and the NTA should review the proposals put forth and add them to the study’s review.
- **Business Impact Study of preferred option:** This should draw from the Council and NTA’s previous international research to outline all the potential outcomes of similar projects in other international cities (including changes in habits and behaviours of clients, customers, visitors and residents).
 - **Correction of retailing shopping data:** Figures from Millward Brown's Dublin City Centre Shopper Survey, commissioned by the NTA, were cited in the plan. These figures would mislead readers that €1 in €5 retail spend came from car shoppers. However, this statement is misleading and, statistically-speaking, is erroneous given that it applies a multiplier to the random sample data. The figures that should be quoted in the study from the NTA survey are shown in the accompanying table. The Chamber is aware that other studies have been conducted which show a higher level. The plan needs to better recognise and better assess the potential impact of changing to the way in which car users – who account for nearly a third of sales – can access the city centre, An emphasis should be placed on ensuring that the 31% figure is not harmed.
- **Sector specific assessments:** Surveys undertaken in bulk tend to provide average assessment. However, the impact on a home goods retailer will vary to a fashion retailer.

The % of retail contribution by shopper mode	
Car	31%
Rail/DART	3%
Luas	15%
Bus	37%
Walking	12%
Cycling	2%

Equally, a solution must be found that will ensure accessibility to all city centre hotels for taxis and chauffeurs. Similarly, it is also essential that the capability of businesses to receive deliveries at appropriate times is not impacted.

- **Provide detailed route plans:** These will obviously be necessary for the business impact study and potential for lost volumes. The maps produced to show access to city carparks during the Luas Cross City construction period are useful and all study options should be compared against this for comparison. As part of the exercise to review this plan, the Chamber used Google maps to determine the best routing for some destination that required crossing the Liffey – for some, the route suggested was via the Eastlink Bridge. It is critical that the movement between major attractions in the city (including businesses and car parks) is reviewed.
- **City Competitiveness:** Concern is growing amongst businesses that the economic recovery will see traffic volumes overcome the current system. Dublin’s business competitiveness is diminished by this, due to time lost in congestion. The cost is borne by the employer who loses staff hour or is impacted by delivery delays etc. Indigenous businesses could suffer reduced productivity and lost opportunities at a time when growth is expected to help create an extra 40,000 jobs. From a FDI perspective, one of the key factors influencing a company’s decision on where to locate their business is ‘ease of travelling around within the city’. The movement of people and goods is being used by international competitor city regions as a differentiator to help them drive their economic growth. Therefore, the impact of non-action must also be taken into consideration in this context.



- **Transformation grants:** The NTA and Council should examine the feasibility of a grant scheme which would support businesses that need to make changes to their premise in order to facilitate the plan. This would be applicable where improvements to deliveries or customer access would offer a good investment for both the business and traffic authorities.
- **Not a long term solution** - The Chamber emphasises that this plan will only buy time for proper investment to be made. Businesses are concerned that the 7 years that this plan proposes to address in terms of traffic congestion will be squandered. Such a time period will be sufficient if, in the next year, a major mass transport project is agreed and progressed with urgency.
 - **Triple transport investment** - The transport capital envelope for Dublin, which the National Transport Authority puts at approximately €150m p.a., is significantly lower than what an international city region needs. Benchmarking Dublin against other cities on a per capita basis highlights the level of underinvestment: London will invest €462m, and Manchester, €367m. Moreover, this comparison does not account for the fact that both of these cities have already implemented significant investment programmes. This means that they are investing from a much stronger base. Dublin’s current investment programme must be at a minimum doubled, but preferably tripled, to keep competitive pace.

- **Positive engagement:** Dublin Chamber has confidence that when Dublin City Council and NTA produce a second draft of the report that addresses the questions put forward in this submission, a more positive and useful engagement with businesses from various sectors will be achievable. The Chamber recognises and thanks both the Council and NTA for their time in the process. We will continue to assist in the engagement with businesses to ensure a constructive process of developing a transformative plan for the movement of people and goods in the city.

RECOMMENDED PRINCIPLES FOR THE GDA TRANSPORT STRATEGY

1. THE STRATEGIC PLAN FOR TRANSPORT IN THE GREATER DUBLIN AREA MUST BE LONG TERM - PRIORITISING, INTEGRATING AND PHASING PROJECTS THAT WILL LAST 100+ YEARS

- To keep Ireland's largest city region competitive internationally
- To meet needs of population and employment growth
- To prevent damaging business productivity; reduce lost work hours and sales
- To generate economic returns in Dublin which boost Ireland's growth

2. MAINTAINING & GROWING ECONOMIC OUTPUT IS DEPENDENT ON TRANSPORT INVESTMENT THAT KEEPS PACE WITH COMPETITOR CITIES

- Movement of people and goods into, out of and around the GDA is how business gets done
- Underinvestment in infrastructure leads to congestion crises which cannot be quickly resolved. This is already occurring in Dublin and will undoubtedly become critical
- Capital investment levels should be pro rata with competitor cities, many of which have already implemented large investment programmes. Dublin's current investment level is one third of that of such competitor cities
- Financing, including private sector financing, is available for infrastructure projects, especially given the historically low cost of capital

3. COMPETITIVENESS, MODAL SHIFT AND INTEGRATION WITH THE LONG TERM PLAN ARE THE MAJOR CRITERIA FOR EVALUATING PROJECTS

- Focus on projects that meet strategic challenges identified in the plan, such as future demand for the movement of people and goods. 'Off-the-shelf' projects promoted by different, often competing, agencies should not set the agenda
- Cost-benefit analysis of projects based on independent assessment of their impact including value in terms of global competitiveness (e.g. connectivity to Dublin Airport, time cost to business of congestion)
- Cost-benefit analyses should be on a 20+ year basis, including build, operate and maintain (e.g. overall cost if a new project reduces road and footpath space etc.)
- Lower the complete cost of transport to the end user, accounting for comfort, journey time, fare, crowding levels, dwell times, ease of using the network, service reliability, user functionality, etc.

4. PRIORITISE MODAL SHIFT FROM PRIVATE CAR ESPECIALLY AT PEAK HOURS AND FOR COMMUTERS TO THE CITY CENTRE

- Realistic, reliable alternatives will drive a shift away from private car use
- Focus on routes with proven demand and high frequency, high volume public transport routes into the city centre
- Building capacity through new tunnels, rail or bridges will benefit generations

5. SHORT TERM, LOW COST SOLUTIONS SHOULD SUPPORT LONG TERM PLAN

- Continuous improvement of existing bus service, which is the workhorse of GDA transport
- Improve intra-city centre movement via walking and cycling supports
- Develop incentives for modal shift to support better demand management