



**dublinchamber**  
of commerce

## **Dublin Chamber response to 'Greater Dublin Area Draft Transport Strategy 2011-2030: 2030 vision'**

Dublin Chamber welcomes the opportunity to input into the Dublin Transport Strategy.

### **Timing**

Dublin Chamber recognises that there are statutory obligations on the NTA to produce this Strategy by June 2011. However, we believe that the new Government should have the opportunity to present their transport programme in advance of the public responding to such a critical Strategy. It is difficult to discuss the Strategy if the level of proposed capital spending on transport is unknown. Nonetheless, we respond to this consultation from the perspective that the Transport 21 Programme continues to reflect the transport investment framework and that 'Smarter Travel – A Sustainable Transport Future' continues to reflect the policy position of Government. We do believe that, if maintained, the T21 programme must be refreshed to reflect the missed timelines of projects and the radically changed economic environment.

This Strategy has been drawn up to be consistent with a National Development Plan 2007-2013 and National Spatial Strategy 2002-2020, both of which no longer reflect or appropriately address the current economic environment:

- Firstly, the Programme for Government acknowledges the radical changes that have taken place in Ireland and commits to drawing "up a new National Development Plan that reflects Ireland's changed economic circumstances, covering the seven-year period 2012-2019".
- Dublin Chamber believes that the National Spatial Strategy does not give appropriate recognition to the role the Greater Dublin Area plays – and will continue to play – in driving the Irish economy. Both the National Competitiveness Council and the CSO highlight the central role that Dublin plays in the Irish economy.<sup>1</sup>

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<sup>1</sup> NCC report 'Our Cities: Drivers of National Competitiveness', April 2009: "It is critical that both national and regional policies support the development of Dublin and of our other main cities and that nationally we work to ensure that the development of our cities is fully understood as being in the national interest.". CSO 'Regional Population Projections 2011-2026', December 2008: In 1961, when the population of the State was at its

Accordingly, it is imperative that the next draft of this Strategy creatively and proactively responds to the new economic environment in which the Dublin City Region finds itself so that competitiveness can be restored and developed. Ultimately, Dublin Chamber reserves its final comments on any transport Strategy for the Greater Dublin Area until Government presents their transport investment programme.

## **Vision**

The vision outlined in the Strategy that “Dublin 2030 is a competitive, sustainable city-region with a good quality of life for all” is attractive. However Dublin Chamber believes that both the strategy vision and strategic objectives outlined are vague and require further elaboration. They are an attractive list of ‘what’ should be done, but there is too little focus on ‘how’ they are specifically going to be achieved and ‘where’ any of the necessary funding is going to come from (particularly evident in chapter 10). The objectives under the Strategy must be ranked in order of priority in order to offer a clear, strong guiding direction on future transport developments to citizens or businesses located in/ planning to locate in the city region. Dublin Chamber calls for the next draft of this Strategy to be more action driven and proactive in its recommendations.

Dublin Chamber welcomes the Authority’s support for bus, Bus Rapid Transit, delivery of the DART Underground, the upgrade of the existing rail network, Metro North and Luas Broombridge. However, we would like to see timelines for delivery of these projects and a clear indication of sources of funding. What the users of the Dublin transport network want to know is ‘if’, ‘when’, and ‘in what order’ these projects are going to be delivered.

Dublin Chamber calls on the next draft of this Strategy to have a more effective vision that is motivational, encapsulates strategic intent and gives everyone involved in delivering it - and all those affected by its delivery - a sense of what is possible, what ‘could be’. The vision and objectives listed need to have a more dominating and clear customer/user focus, invariably described in terms of customer/user experience.

## **Coordinated thinking**

As outlined in this document and in ‘Smarter Travel’, “Transport 21 alone will not be enough to address the unsustainable trends in transport...altering travel behaviour will require the alignment of policies right across Government”. So Dublin Chamber is disappointed that this Strategy gives no clear indication of exactly how the NTA is going to work with all of the Government Departments to ensure that the transport network is effectively servicing the needs of all communities in Dublin (elderly, ill, those needing to access childcare etc). Chapter 5 raises the challenges and identifies the constraints, but it does not offer any specific action plans to tackle the issues.

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lowest level (2.8 million), Dublin accounted for just over a quarter of the total population while the share of the Mid-East region was 6.7 per cent. By 2006 Dublin had increased its share to 28 per cent while the Mid-East represented 11.2 per cent of the total...the Mid-East is projected to further increase its population share to 13.2 per cent by 2026. Dublin’s share of the population... will increase marginally to 29.1 per cent by the end of the projection period. The population share of all other regions will decline over the same period apart from the West which will remain steady.”

Dublin Chamber continues to warmly welcome the advancement of Real Time Passenger Information and integrated ticketing. These improvements have been too long in their delivery; however we look forward to their full roll out in the near future. Dublin Chamber believes there is an opportunity to build upon these projects to further strengthen the integration of services across all the transport providers. We call for the ultimate goal of this Strategy to be a fully unified, totally integrated transport network, focused on driving greater efficiencies and eliminating duplication.

### **Travel demand management**

Dublin Chamber is concerned with the continued focus on travel demand management. We acknowledge that this focus was inherited from the Strategy's predecessor - the Dublin Transportation Office's report 'A Platform for Change' - which focused on "travel demand management measures aimed at reducing the growth in travel and encouraging a transfer from car to more sustainable modes of travel". However this focus was part of a two-pronged, interdependent Strategy which aimed firstly to deliver by 2016 "a comprehensive public transport network that would provide an attractive alternative to the car for most people within the GDA". Given that timelines for the delivery of projects outlined in the Transport 21 programme have significantly slipped, Dublin Chamber calls for an end to discussions about travel demand measurements in the immediate term.

Dublin Chamber does not support - at this time - the identification of travel demand measures outlined in chapter 6 or chapter 11 that could be used to meet the Strategy objectives because:

- The transport network of the Dublin City Region needs to be significantly upgraded through the delivery of the rail projects outlined in Transport 21 and the Eastern Bypass if it is to become an integrated system that would realistically encourage a modal shift to public transport. Until there is an integrated public transport network in place, discussions regarding the imposition of penal measures on private vehicles must cease; and
- This Strategy is exclusively for the Greater Dublin Area. Thus any consideration of the introduction of fiscal travel demand measures in the Dublin region, without roll-out across other cities/ towns, will be biased and impact negatively on the competitiveness and attractiveness of the Greater Dublin Area. Until there is a national Strategy, or a number of individual Strategies for the regions, that also examine the possibility of introducing fiscal travel demand measures, any discussion regarding the imposition of penal measures on private vehicles in the Greater Dublin Area must cease.

Dublin Chamber is concerned that insufficient weight has been given to the movement of goods in the hierarchy of transport users identified in chapter 7. This is a Strategy for the Greater Dublin Area, the engine of growth for the whole country. Given the vital role the airport, port and road network in the Dublin region play in the economic life of the entire nation, it is important that the movement of goods is given the same level of attention in the Strategy as the movement of people. In addition to servicing the need of the population within the Greater Dublin Area, as an island nation our economic recovery will be reliance on our exports. Dublin Chamber does not believe the small level of lip service paid to our international gateways and freight requirements in chapter 8 and 11 sufficiently acknowledges and caters to the unique needs of Dublin.

Furthermore, this hierarchy of transport users does not give sufficient recognition to the fact 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 does not support the proposal in the Strategy to consider capping "the numbers of car parking spaces on an area-wide basis...the use of such a measure should also be considered at major trip attractors such as large third level institutions, Dublin Airport, and other such developments."

Dublin Chamber calls on the NTA to recognise that shopping is a discretionary activity, and any perception of inconvenience caused by disrupted travel patterns due to restrictions placed on private vehicles will simply result in individuals selecting alternative locations to shop rather than promote a move to public transport. Indeed, the weight of a weekly grocery shop for a family will nearly always make the option of moving to public transport unfeasible for most shoppers. The consequences for the Dublin local authorities' rate base – in particular Dublin City Council - should be at the front of any proposals which will make life even more difficult for the city region's retailers.

### **Land use and planning**

Dublin Chamber fully supports the identification within the Strategy that "land use planning and transport planning need to be considered together in the overall development of the region." We fully agree that they are inextricably interlinked and that past failures to link the two have led to the current situation where appropriate transport facilities are not linked to areas of development. All future developments must be planned and delivered in a coordinated holistic fashion. Thus, we support the Authority in its proposed measure LU3: "Development plans and Local Area Plans should ensure that there is a sequential approach to development whereby lands which are most accessible by public transport are prioritised for growth".

### **Public Transport**

Dublin Chamber accepts that there will be a need to prioritise and improve those modes of transport that are capable of carrying significantly more people within the limited road space. We support the assertion made in the Strategy that "bus will continue to be the predominant public transport mode in terms of network coverage throughout the Greater Dublin Area", and we are supportive of the measures outlined under BUS1. However in terms of bus priority infrastructure and the introduction of any bus priority scheme, Dublin Chambers calls for in advance of implementation:

- full consultation with business representatives,
- a comprehensive media campaign to be undertaken,
- the timing of its introduction to take into consideration others activities taking place in the area; and
- the full delivery of any mitigation measures deemed necessary.

Dublin Chamber recognises the opportunities available through Bus Rapid Transit. We welcome its introduction in this Strategy, and believe it should be considered as a transport option in certain areas where bus and light rail services are currently unavailable/ inadequate.

Dublin Chamber supports the Authority in its intention to "seek the provision of an appropriate level of off-street coach parking at or close to new sports stadia, conference centres, larger event venues and major tourist destinations." Tourism is vital to the Dublin economy so it is important that coach stops for passenger boarding / alighting must be carefully considered and must only be implemented after full consultation with the business community. All agreements must give consideration to the needs – particularly access needs - of hotels, coach operators and entertainment venues, and not simply the bus or tram operators.

Dublin Chamber welcomes the Authority's support for the DART Underground, Luas Broombridge and Metro North projects, and the improvement and upgrade of the existing rail network system. However the next draft of the Strategy must include detailed timelines for their delivery, and a clear indication of the impact of the national finances on the above-mentioned timetable for delivery.

Dublin Chamber does not support the Authority's decision not to recommend the development of the Eastern Bypass during the Strategy period.

### **Conclusion**

This Strategy offers a collection of 84 measures that will address all the challenges and issues currently facing users of the transport network in the Greater Dublin Area. Dublin Chamber welcomes the Authority's support for the major public transport projects outlined in Transport 21 programme, for Park & Ride facilities, for the roll out of integrated ticketing and fares, Real Time Passenger Information, improved land-use and planning. However without clearly outlining a detailed timeline for delivery of these projects and initiatives, and clearly stating where the available funding is coming from to actually implement the measures in this Strategy, it is difficult to offer support to this Strategy.

Dublin Chamber does recognise that once this Strategy has received Ministerial approval, within 9 months an implementation plan covering the first 6 years will be prepared. However, until we see the sequence of delivery of projects, and the timetable attached, it is impossible on behalf of our members to support this Strategy. In addition, Dublin Chamber remains extremely concerned that this Strategy is based on the policies and investment programme of the past Government, and on a series of National Plans and Programmes that do not reflect the new Irish economic environment.

In conclusion, Dublin Chamber calls for:

- The next draft of this Strategy to include timelines for delivery and clear indications of where secured, guaranteed finances are coming from; and
- The statutory obligations to be relaxed, resulting in no further movement on this Strategy until the new Government has clearly outlined their transport programme for the Greater Dublin Area.