



Submission to the National Transport Authority on the Luas Green Line Finglas Extension

September 2020

Dublin Chamber is a strong supporter of public transport and recognises its importance to the success of Dublin. Businesses throughout Dublin need an effective public transport system for both their employees and consumers alike. Dublin Chamber welcomed the commitment given in the National Planning Framework and the National Development plan which outlines four Luas network expansions including Finglas, Lucan, Bray and Poolbeg. The Chamber is fully supportive of the proposals and the further enhancement and development of the Luas Network across the city and Greater Dublin Area and we have repeated this in various submissions.

The Luas expansion represents one of a number of essential improvements that are needed to deliver the world-class and sustainable public transport system that the city needs. We share the NTA's ambition to have more people using public transport and for Dublin to have a public transport network that rivals those in the best cities in the world. Projects such as the Luas Finglas extension provide an alternative public transport option that is more reliable, efficient, sustainable and faster, and further connects more communities into the wider Dublin rail network.

Overview of Dublin Chamber Position

Dublin Chamber is broadly supportive of the Luas Finglas extension and emerging preferred route. The proposed Luas extension comes at a crucial time for Dublin. With the city due to grow by 25% and congestion one of the most significant challenges facing the Dublin region, particularly with the capacity constraints imposed by the Covid-19 crisis, the expansion of the Luas is needed now more than ever. If Dublin is to achieve its aim of becoming a sustainable and dense city the role of public transport must dramatically increase.

In particular, we welcome the plans put forward in the Luas Finglas Extension to:

- Reduce journey times to the city centre by up to a third while also increasing frequency and reliability of public transport service.
- Removal of potentially 10,000 car journeys from the local area. Reducing congestion and enhancing the sustainability of the area.
- Rollout of segregated cycling and pedestrian paths alongside the new Luas corridor.
- Developing Dublin's rail network and incorporating more communities to access it.
- Development of improved transport interchanges through the park and ride facility at Charlestown and connecting into the DART at Broombridge.

A more detailed outline of the Chamber's view is included in the remainder of this document.

Accelerating Delivery & Securing Investment

Transport is a critical function of any city, and Dublin is seeing the effects of years of underinvestment in urban infrastructure with high levels of congestion. Dublin is frequently ranked as one of the world's most congested cities.¹ In times of crisis, recession, and economic downturn the first projects to be pulled are often capital investments in infrastructure.

Projects such as the Luas Finglas extension are vital to combat and reverse the cities escalating congestion problems. The National Development Plan outlines four Luas network expansions, including Finglas, Lucan, Bray and Poolbeg. All of these extensions are vital in serving these growing communities, but also developing a functional interconnected transport system in Dublin.

Dublin Chamber has previously called on the Minister for Transport Eamon Ryan to expedite the delivery of the Finglas Luas extension. The Chamber is of the view that ambitious, concerted investment in new transport infrastructure is needed to revitalise the economy and ensure that Dublin's transport system is ready to cope with both existing demand and future growth. The Chamber calls on the NTA to accelerate plans for the three other Luas extension projects to ensure that all four can be delivered alongside the MetroLink and BusConnects by 2027.

The delivery of a much-improved public transport system will require a significant increase in the level of investment in public transport services by central Government. Higher levels of

¹ <https://www.irishtimes.com/news/ireland/irish-news/dublin-one-of-worst-cities-in-world-for-traffic-congestion-1.3791651>

investment in transport infrastructure will be required in order to address the shortfall of the past decade. Several projects, including, MetroLink, DART+, BusConnects, the Greater Dublin Area Cycling Network and the four proposed Luas extensions, are at a critical stage in their development and require a strong commitment to delivery and investment from the Government. We cannot afford to repeat the mistakes of the past and further delay these projects due to lack of investment. These projects will help to dramatically improve quality of life in the Dublin region, reduce the chronic traffic congestion that is holding the city back and provide huge impetus to the Government's aim of reducing carbon emissions by moving millions of journeys each year from cars to sustainable public transport.

A reliable, consistent, efficient and – importantly – sustainable service needs to be delivered for Dublin in the next 10 years.

Sustainable Transport and Modal Change

The Government's Climate Action Plan lists adding additional capacity to the Luas Network as a key action to empower modal shift². Public transport and improving access and the reliability to public transport across the Dublin region is vital if we are to achieve a sustainable and resilient city.

The Luas has proven to be invaluable to commuters and residents alike and delivers a highly reliable, frequent and efficient service, directly linking communities to the city centre and to each other. The Chamber notes the success of the Luas Green line extension to Broombridge with the number of users growing all the time. Extending the Luas Green line to Finglas would open up the line to tens of thousands more people, who are currently only served by bus operators, often at maximum capacity during peak hours, offering them a compelling and reliable public transport option.

The proposed Luas track will enable faster journey times. At present, journey times from Charlestown to Trinity College in the city Centre take approximately 44 minutes during morning rush hour. Luas Finglas will reduce this journey time by one third, to approximately 30 minutes. The M50 and N2 route are some of the most congested roads in the city in terms of private cars. Introducing the Luas, combined with new park and ride facilities, will help reduce the number of cars coming into the city each day. The Chamber also supports

²Government Climate Action Plan, 2019 https://www.dccae.gov.ie/en-ie/climate-action/publications/Documents/16/Climate_Action_Plan_2019.pdf

the innovative use of grass track to maximise greening and reducing negative impact it could have on the parks it cuts through.

The 600 vehicle park and ride facility at Charlestown is a welcome move. Congestion in the city is a significant issue and moves towards park & ride facilities, particularly located near the M50 and N2 it opens up the city's public transport to those travelling from the Greater Dublin Area into the city centre. Park and ride facilities are key in enabling non-city residents to switch to public transport as they enter the city, a modal change that has often been overlooked and could have a significant positive impact in reducing congestion and removing reliance on private cars.

Active Transport

The Chamber have long been strong advocates for the progression of the Greater Dublin Area Cycle Network Plan. In recent months due the Covid-19 crisis we have seen a significant demand for greater infrastructure for active transport. Segregated cycle paths and dedicated active transport infrastructure will create modal chance and help to realise the Chambers ambition of have 20% modal share by active transport by 2030.

The Chamber welcomes the provisions in the plan to include a cycle and pedestrian path along much of the line. However the Chamber questions the ambition of the plan, and calls on the designers to examine all possibilities that would allow for a cycle track along 100% of the route. It is also important to ensure that the route is integrated into the GDA Cycling Network plan. The city currently has too many examples of segregated purpose built cycling infrastructure that are not linked together, which discourages users and makes the investment obsolete.

In addition to the creation of these active transport links alongside the Luas the Chamber highlights issues experienced at other Luas tracks and cycle ways across the city. Public safety must be brought to the forefront in their design and execution. Designers should listen to the concerns of cyclists in their use of 'kissing gates' and excellent street lighting along the path should be prioritised. The provision of safe and secure bicycle parking should also be looked at both Luas stops and the proposed Park and Ride at Charlestown to allow for greater transport interchange.

Transport Interchange

There is an urgent need for better integration of the various public transport modes in Dublin. Currently, there is an inadequate level of synchronisation across the various modes. The

Luas extension completed in 2017 went some ways to address this issue but unfortunately the overall situation has not improved. Particularly during peak commute times, trains and buses become increasingly crowded as you move closer to the core of the city and there are significant capacity issues making transferring from one service to another undesirable, and in some cases, impossible.

Improved transport interchange is essential in creating a modern and functioning transport system for Dublin. Broombridge is a key transport hub for this Luas extension. It links the Luas to the DART line and connects it into the wider public transport system. This will be vital in connecting the communities in the Finglas area to the rest of the city. Thought must also be given to enhanced capacity on the DART and how this proposed extension and additional passenger demand will interchange and interact seamlessly with the station and switching transport mode.

Improvements to fares and ticketing

The Covid-19 crisis has resulted in a significant increase in the pace of digitalisation across many sectors, including public transport. The rollout and investment in integrated and digital ticketing is now essential. Cash was temporarily suspended on Irish Rail, Bus Éireann and Dublin Bus services,³ and post crisis public transport users will have enhanced expectations of the service offering. Digital integrated ticketing is an issue that Dublin Chamber raised previously and following the crisis there will be an acceleration of demand for digital only services.

The role out of the Leap card and its ability to work across the DART, Luas and bus network has been a welcome development for the city, however more must be done to harness the latest payments technology to improve access to transport across Dublin. Dublin Chamber welcomed the introduction of the 90min fare period for Dublin Bus, this was long overdue in a city of Dublin's size. Fare prices need to more accurately reflect the full passenger journey rather than charging for each part and discouraging modal interchange.

The Chamber also calls for technology to be used to enhance access and integration of the Dublin's public transport offering. Buses, trams and trains are not competitors but all essential components of Dublin's public transport offering. Greater collaboration is needed

³ The Irish Times, 'Coronavirus: Bus and train drivers will no longer accept cash, says union', 2020; <https://www.irishtimes.com/news/ireland/irish-news/coronavirus-bus-and-train-drivers-will-no-longer-accept-cash-fares-says-union-1.4204146>

between the organisations that run these services to enhance the transport network and their passenger's complete journeys. There is a need for a single Dublin transport app that integrates across all transport networks, bus, bike, Luas and DART, and shows accurate 'real-time' information to allow passengers commute to their destination in the quickest way possible. Such a move would strengthen Dublin's 'Smart City' credentials.

Dublin's Growth and Development

Plans to expand the Luas were listed in the National Planning Framework (NPF) as a key future growth enabler, alongside other key rail projects, including the development of the MetroLink and DART expansion. Alongside the NPF a key aspect of Dublin's Metropolitan Area Strategic Plan (MASP) is to sustain the growth of the city. The city faces significant challenges, estimates of a growing population and high levels of congestion and housing shortages. Improving and investing in key infrastructure projects, such as the Luas extension, are vital to sustaining this growth and maintaining Dublin's competitiveness.

Dublin Chamber is an advocate for transport oriented development, that development, particularly the development of housing, employment, public services and leisure spaces occur within close proximity to key public transport corridors or facilities. The NPF also highlights how developing new public transport corridors can open up key sites in the city for brownfield regeneration. By developing the Luas Finglas extension we can enable community transformation by opening up areas to new opportunities. Previously the Luas has acted as a catalyst for local regeneration by un-locking brownfield sites for development and enabling greater density in the areas it serves.

24-Hour Transport

Dublin Chamber has long advocated for the rollout of 24-hour and late-night transport facilities, recognising the need and demand for such services. The Chamber has previously welcomed the rollout of a 24-hour service on the 41 (City Centre, Airport, Swords) and the 15 (Ballycullen road, City Centre, Clongriffin) Dublin Bus routes. The current way in which our transport system operates does not reflect how our city functions. Dublin Chamber would like to see an enhanced roll-out of 24-hour and late-night transport services across the city where appropriate. Late night workers, such as those in the hospitality sector or healthcare sector, need to have access to these services to commute to and from work. The lack of housing in the city has compounded this issue and increased commute times for many workers. At Christmas time for the last number of years the Luas and DART have both operated late-night services to meet increased demand at that time of year. The Chamber

would like to see increased focus on the possibility of more late night services or possible 24hr services which would help to support Dublin's night time economy.

Conclusion

Dublin Chamber supports the Luas Finglas project, the proposed extension of the Luas Green Line from Broombridge to Finglas. The proposed extension will create a key public transport corridor connecting the growing communities of Charlestown, Finglas, Village, Finglas West, St. Helena's and Tolka Valley to the city centre and beyond.

Dublin Chamber ultimately views the Luas Finglas extensions as part of a larger plan to alleviate congestion and enhance public transport infrastructure in the city. Ambitious, concerted investment in new transport infrastructure is needed to revitalise the economy and ensure that Dublin's transport system is ready to cope with both existing demand and future growth. The Chamber calls on the NTA to expediate the plans and delivery of this extension and to accelerate plans for the three other Luas extension projects to ensure that all four can be delivered alongside the MetroLink and BusConnects by 2027.