



Submission on the Review of Sustainable Mobility Policy

February 2020

Dublin Chamber is the representative body for businesses in the Greater Dublin Area. Our cross-sectoral membership base of 1,300 firms spans the spectrum from small start-ups to major multinationals and supports 300,000 jobs nationally. Dublin Chamber is at the forefront of driving the green agenda in the Dublin business community and has long been a leading voice in advocating for public transport and active travel infrastructure. The Chamber's ambition is for Dublin to have a highly efficient sustainable public transport system in a well-planned city. The Chamber is pleased to make this submission to the Department of Transport, Tourism and Sport in response to its consultation on the Review of Sustainable Mobility Policy. It refers to the Department's background papers on the Climate Change Challenge, Active Travel, Congestion, Land Use and Transport Planning, Greener Buses, and Regulation of Public Transport.

Climate Change Challenge

Climate change must be tackled urgently; the Government must not adopt a 'wait and see' approach, delaying implementation in the hope that technological advancements will facilitate a cheaper transition at a later date. Failure to meet targets would not only impact the environment and incur significant EU fines, but would also damage Ireland's reputation as a member of the UN, a party to the Kyoto Protocol, and a signatory to the Paris Agreement. Dublin Chamber notes that Number 11 of the UN Sustainable Development Goals, which Ireland has committed to achieving by 2030, is *Sustainable Cities and Communities*. Current data and international trends indicate that urbanisation will continue strongly in the years to 2050, and this trend is acknowledged in the *Climate Challenge Background Paper*. The National Planning Framework conservatively estimates a 25% increase in Dublin's population by 2040, and a 50% increase in Ireland's other four cities.¹ This is indicative of where climate mitigation measures will have the most impact.

Transport produces 20.2% of Ireland's emissions and is therefore a critical sector to target for emissions reduction.² This is recognised in the Government's *Action Plan to Tackle Climate Breakdown* which sets out 28 Actions (Actions 72-100) for transport delivery specifically.³ Rapid progress in reducing transport emissions will require an urban focus. Capital expenditure in urban areas offers a higher return on investment due to population density and greater usage of completed projects. Similarly, climate measures in the transport space should

¹ Dept. Housing, Planning & Local Government, *National Planning Framework*, p.62,

https://www.housing.gov.ie/sites/default/files/publications/files/project_ireland_2040_npf_7mb.pdf

² Environmental Protection Agency, <https://www.epa.ie/ghg/transport/>

³ Dept. Climate Action, *Energy & Environment, Action Plan to Tackle Climate Breakdown, Annex of Actions*, pp. 46-52, <https://www.dccae.gov.ie/documents/Climate%20Action%20Plan%202019%20-%20Annex%20of%20Actions.pdf#page=46>

be focused on cities to secure the greatest value for money in terms of emissions reduction. While rural areas will need to transition to sustainable mobility practices, this will be a slower process with less of an immediate carbon emission reduction from transport specifically.

All EU member states are required to adopt a climate action strategy with a long-term perspective of at least 30 years.⁴ In Dublin Chamber's submission to the Department of Communications, Climate Action, and the Environment on Ireland's long-term strategy to reduce GHG emissions past 2030 to 2050, we strongly argued that the effectiveness of any strategy post-2030 will depend upon the level of infrastructure investment that has already taken place at that point. In particular, the post-2030 strategy must follow on from a decade of significant investment in public transport and sustainable transport infrastructure.⁵ The Department of Transport, Tourism, and Sport therefore has a central role to play in meeting Ireland's emissions reduction targets.

Ireland's sustainable transport infrastructure must be sufficiently attractive in terms of capacity, convenience, reliability, efficiency, and affordability to achieve behavioural changes on a large scale. As socially inclusive investments, public transport projects also offer a means of ensuring a just transition to a low carbon economy, mitigating adverse impacts on low-income earners. The most important public transport projects for prioritisation are MetroLink, the DART Expansion Programme including DART Underground, and BusConnects. Funding decisions regarding these projects must be considered in light of the cost to Ireland of EU fines for non-compliance with environmental targets, and the need to compensate for past underinvestment in infrastructure.

Expeditious delivery of MetroLink is important to address congestion in the rapidly growing North County Dublin area. Fingal has a population of 296,214, making it the third most populous county in the country, and also Ireland's youngest population.⁶ Since the last census, Fingal's population has grown by more than the entire province of Connacht.⁷ It will also provide a direct rail link between the airport and the city centre, allowing travellers arriving at Ireland's aviation hub to connect quickly and conveniently with the central business district and the wider public transport network. The absence of this modern amenity makes an underwhelming impression upon business travellers and foreign investors.

Dublin Chamber strongly supports implementation of the DART Expansion Programme and encourages Government to commit the funding necessary to ensure that this occurs on schedule. The Chamber believes that the DART Underground project must be progressed as part of this. DART Underground would be a national project, unifying the Irish rail network and connecting Sligo to Rosslare, and Dundalk to Tralee. Designed appropriately, it would provide the basis for direct inter-city routes linking Cork and Limerick with Dublin and Belfast. High-

⁴ Government of Ireland, *Public Consultation on the Long-term Strategy for Greenhouse Gas Emissions Reduction*, November 2019, <https://www.dccae.gov.ie/en-ie/climate-action/consultations/Documents/8/consultations/Public%20Consultation%20on%20the%20Long-Term%20Strategy%20on%20Greenhouse%20Gas%20Emissions%20Reduction.pdf>

⁵ Dublin Chamber Submission to DCCAE https://www.dublinchamber.ie/DublinChamberofCommerce/media/banners/Dublin-Chamber_Submission-to-DCCAE-on-Long-TermGHG-Strategy_Dec-2019.pdf

⁶ CSO, *Census 2016*

⁷ CSO, *Census 2016*

speed rail between the main cities on the island should be a long-term objective of sustainable transport policy. Unfortunately, DART Underground is a striking example of the tendency to drop long-term projects on grounds of short-term fiscal constraint. It was considered as early as 1971 but it has been subject to multiple plans, postponements and revisions. In 1972 concern was expressed in the Dáil that a significant sum of public money was being spent on planning the project but with no firm indication from Government as to the level of capital it was willing to commit to construction.⁸ Almost half a century later, no progress has taken place. A revised Railway Order, expected to cost c. €40m, would get the project ready for commencement in time for the review of the National Development Plan.

Finally, the business community has its own role to play in supporting commuters' modal change from the private diesel or petrol car to public or sustainable transport. This should be recognised in and enabled by Government policy. The Bike to Work Scheme, for example, has been very successful, and similar programmes would be most welcome. Flexible and remote working practices, which can help to reduce congestion by removing the need for peak-time commuting, could also be better promoted by businesses if appropriate Government guidance and support is put in place.

Active Travel

While transformative public transport projects are awaited, significant modal shift can be achieved in the short-term by better enabling and encouraging active travel in Dublin. Cycling and pedestrian options are both important in this respect. Active travel policy also has an important role to play as an interconnector for public transport. For example, cycling should be encouraged in multi-modal commuting, switching between buses and cycling.

Ambitious investment in cycling infrastructure is essential in order to meet the goals of reduced traffic congestion, cyclist safety, improved quality of life, and carbon emissions reduction. There has been a sharp increase in the number of cyclists over the past decade, despite the lack of safe and attractive cycle lanes in the city. Government must respond to this public demand by delivering proper cycling infrastructure. It is a source of frustration that so little of the Greater Dublin Area Cycle Network Plan, launched in 2013, has come to fruition. There has been some progress on individual projects, but while these are necessary to build up the network, they cannot exist in isolation, and overall the pace of delivery has been far too slow.

Dublin Chamber notes with concern that the Canal Cordon Report 2018 showed a 2% slip in cycling numbers based on the previous year. While the current figure represents a 153% increase on 2006, it is disappointing to see a decline; concerns about infrastructure capacity and safety are the likely cause of this.⁹ Poor cycling infrastructure is one of the key barriers active travel in urban areas. Failure to deliver on the Cycle Network Plan will impact on Dublin's ability to reduce congestion and carbon emissions, and it calls in to question the Government commitment to sustainable mobility.

Encouraging greater pedestrian travel will require close attention to the public realm. The design of the public realm in Dublin too often prioritises the car. A greater focus is needed on

⁸ Dáil Éireann Debates Vol. 264 No. 1, Tuesday 28 November 1972

⁹ NTA, *Canal Cordon Report 2018*, https://www.nationaltransport.ie/wp-content/uploads/2019/04/Canal_Cordon_Report_2018.pdf

the pedestrian environment, including good walking infrastructure, well-lit streets, and a visible Garda presence. Dublin Chamber recently surveyed Dublin's international community as part of a research project into the city's global reputation, and discovered that just 1 in 7 international workers here would characterise the city as 'safe'.¹⁰ This is particularly pertinent to active travel policy as a perceived lack of safety is a deterrent to walking. For example, if a part of central Dublin is not perceived to be safe, walking though it as part of a daily commute will not be an attractive option.

Congestion

Dublin has increasing levels of congestion, rising air pollution, and was recently ranked among the most traffic-congested cities in the world. Traffic congestion in the Dublin region costs the Irish economy an estimated €350 million per annum, rising to €2 billion per annum by 2033.¹¹ Demand management strategies or traffic restrictions are a medium-term solution to changing road users' behaviours. Models of demand management in Dublin should focus on encouraging long-term behaviour change.

Demand management strategies that add a further cost to the commuter should be avoided where possible. Charging people to access certain areas will disproportionately impact lower income earners; instead of encouraging behavioural change, it may create a system in which those who can afford to pay will. In light of already the growing level of congestion, and the prediction that by 2040 commuting trips will rise by 35% nationally, the majority of commuters may choose to pay the charge for a more direct route, undermining the goal of traffic reduction.

Consideration should be given to options such as Low Emission Zones (LEZs), which aim to change behaviour by encouraging commuters and vehicle owners to move towards sustainable transport and cleaner vehicles, while also helping to reduce congestion. This is a 'polluter pays' model, in which those who continue to use high-polluting vehicles in our cities will be subject to access restrictions. LEZs have been successfully implemented in over 200 cities and towns across 15 countries in Europe. Gradual introduction of LEZs in specific streets and areas with the heaviest congestion and pollution will encourage change.

Parking space allocation within the city also needs to be examined. In line with the *NTA's Transport Strategy for the Greater Dublin Area (GDA) 2016-2035*, Dublin Chamber supports the setting of caps on parking spaces for all new developments, both residential and commercial, in line with provision of public transport in the area. Employment hubs such as the centrally located Grand Canal and North Lotts area are well-served by public transport and new multi-story carparks in these areas should be discouraged.

All stakeholders in urban centres need to discourage car commuting where possible, including by reducing the availability of workplace parking. Road and parking space reallocation has become a feature of demand management strategies internationally; car lanes have been

¹⁰ Dublin Chamber, *Dublin's Global Reputation*, October 2019, [https://www.dublinchamber.ie/getattachment/Business-Agenda/Dublin-s-Global-Reputation/Dublin-Chamber_Global-Reputation-Report-\(3\).pdf?lang=en-IE](https://www.dublinchamber.ie/getattachment/Business-Agenda/Dublin-s-Global-Reputation/Dublin-Chamber_Global-Reputation-Report-(3).pdf?lang=en-IE)

¹¹Dept. Transport, Tourism and Sport, *Costs of Congestion, An Analysis of the Greater Dublin Area*, 2017, <https://assets.gov.ie/19169/7c2814f5572d4ec7874a034fb0e72bea.pdf>

converted into bus lanes, bike lanes, and widened footpaths.¹² Reducing demand in this way will help in encouraging modal shift.

Land Use and Transport Planning

Planning for a high density urban core will have a significant impact on city sustainability by making public transport and active travel more attractive and viable transport options for commuters. Currently, many of those who live and/or work in the GDA experience long commutes, contributing to carbon emissions and impacting on quality of life. Joined-up thinking between land use and transport planning is critical to addressing this problem.

Through investment in the public transport infrastructure that is needed to support subsequent high-density housing, the urban population will be able gravitate toward low carbon transport options. The built environment should support overall liveability, ensuring that people can live within a short commuting distance of their work. This in turn should dramatically reduce the need for cars in the city centre. Dublin Chamber has long advocated that brownfield sites in the city centre that are located on existing transport lines be rezoned for housing.

The European Commission has called on member states to adopt Sustainable Urban Mobility Plans (SUMP). These are drawn up for an entire 'functional city'. In Dublin's context this means the Greater Dublin Area.¹³ The SUMP concept recognises the importance of urban mobility and seeks to further the goal of European cities developing urban landscapes along a more sustainable path, thus ensuring a more resource-efficient transport future. The eight concepts in the 2019 SUMP Guidelines reflect Dublin Chamber's recommendation for an integrated urban planning approach to include quality of life factors and accessibility.¹⁴

Ireland's National Planning Framework focusses on improving the density of the five cities and sets out targets to achieve this. Dublin Chamber welcomed the NPF and is keen to ensure its implementation. In late 2018, Dublin Chamber joined the chambers of commerce of the four other cities identified in the NPF – Cork, Galway, Limerick, and Waterford – to form City Regions Ireland, in recognition of our shared requirements for better urban infrastructure and land planning, and the need for Ireland's cities to have a strong collective voice.¹⁵

In line with the NPF, the Metropolitan Area Strategic Plan for Dublin aims to integrate residential and transport infrastructure planning and investment over the next decade. It includes ambitious targets to improve density in the existing footprint of the city. However, there is no single executive or body with the responsibility and authority required to drive implementation of the MASP across the four local authority areas. Dublin Chamber is concerned that implementation is unlikely to be successful in the absence of such an executive

¹² Croci and Douvan, 2017.

https://www.researchgate.net/publication/304530246_Urban_Road_Pricing_A_Comparative_Study_on_the_Experiences_of_London_Stockholm_and_Milan

¹³ European Commission, https://ec.europa.eu/transport/themes/clean-transport-urban-transport/urban-mobility/urban-mobility-actions/sustainable-urban_en; <https://www.eltis.org/mobility-plans/sump-concept/>

¹⁴ European Platform on SUMP, Guidelines for Developing & Implementing a SUMP, p.10, https://www.eltis.org/sites/default/files/sump-guidelines-2019_mediumres.pdf

¹⁵ City Regions Ireland, <http://www.dublinchamber.ie/DublinChamberofCommerce/media/banners/City-Regions-Ireland-28-11-18.pdf>

and has expressed support for a directly elected mayor on the condition that such an office would be responsible for the MASP.

It is important that the Sustainable Mobility Policy is closely aligned to the NPF and, specifically, that it supports the achievement of targets set out in the Metropolitan Area Strategic Plans for Dublin and the other cities.

Greener Buses – Alternative fuel options for the urban bus fleet

Dublin Chamber does not recommend that Government wait for a ‘silver bullet’ alternative fuel option for the urban bus fleet. While technology is moving at a fast pace, it will be some time before one renewable fuel source emerges as the best overall. Analysis indicates a likelihood that some fuels will suit certain routes or locations better than others.¹⁶ However, there are a number of options that can be implemented now. The work done by the Department of Transport through its Low Emission Bus Trials was welcome, and Dublin Chamber similarly commends the decision not to purchase any new diesel busses for Dublin Bus or Bus Éireann after July 2019.¹⁷ However, this is not ambitious enough. Activity at this pace and scale will not meaningfully contribute to meeting set 2030 targets.

The *Sustainable Mobility-Greener Buses* consultation paper mentions that the National Development Plan seeks to accelerate the transition to a low carbon urban bus fleet, and that there is a goal to convert half of the bus fleet operating in the GDA by 2023 with plans for full conversion by 2030. While we commend the research outlined in the *Greener Buses* consultation paper using COPERT analysis, it is likely that without decisive action in the immediate future, the Government will fail to achieve the 2030 deadline for full fleet conversion.¹⁸

Electric and electric hybrid options have thus far been the most popular low carbon option implemented internationally and are growing as a share of bus fleets quickly.¹⁹ Promising work is also being done by Gas Networks Ireland on the use of Renewable Natural Gas, commonly known as bio-methane or biogas, in transport. Bio-Compressed Natural Gas (CNG) has been piloted on a very small scale in Cork using just one route.²⁰ If real advancements are to be made in powering the urban bus fleet with greener fuels, then more ambitious pilot programmes of this kind must be funded. Hydrogen offers another zero carbon option, and significant research into the use of hydrogen as an alternative bus fuel is also promising. In Scotland, hydrogen has been adopted successfully in cities and is making a valuable contribution to the economy. Aberdeen has introduced ten hydrogen fuel cell busses which are fuelled by one hydrogen refuelling station.²¹ Hydrogen Mobility Ireland has made the case

¹⁶ Dept. Transport Tourism & Sport, Greener Buses Background Paper, p.48

¹⁷ <https://www.gov.ie/en/policy-information/b72548-transport-and-climate-change/#low-emission-bus-trials>

¹⁸ Dept. Transport, Tourism & Sport, Greener Buses Background paper, p.38

¹⁹ Sustainable-bus.com <https://www.sustainable-bus.com/electric-bus/electric-bus-public-transport-main-fleets-projects-around-world/>

²⁰ Gas Networks Ireland <https://www.gasnetworks.ie/corporate/news/active-news-articles/irelands-first-journey-biogas-bus/>

²¹ Scottish Cities Alliance, <https://www.scottishcities.org.uk/media/case-studies/building-the-hydrogen-economy-in-scotland>

for the introduction of hydrogen in Ireland and outlines a full strategy for how hydrogen can be rolled out in Ireland.²²

Dublin Chamber recommends that the Sustainable Mobility Policy be ambitious and open to large-scale piloting of alternative fuel options for the urban bus fleet. Piloting should be on an impactful scale that facilitates easy conversion into a long-term programme of change. It should include, for example, matching a number of routes to a specific fuel and technology.

However, the most impactful way to ensure that the bus network contributes to a decrease in emissions is to providing a standard of service that encourages modal shift. A modal shift away from the private car towards bus use should be the main priority. This can only be achieved by delivering BusConnects, whether the fleet is powered by a renewable fuel or otherwise.

Regulation of Public Transport

Currently, responsibility for sustainable transport in the capital city is shared by Transport Infrastructure Ireland, the National Transport Authority, Dublin Bus, Bus Éireann, Irish Rail, and the four Local Authorities. Joined-up thinking between these parties is important.

Emerging regulatory issues include the need to provide for sustainable new technologies that offer valuable shared mobility solutions in cities. Personal Powered Transporters, commonly known as e-scooters, are a prime example. E-scooters are a low-emission urban transport solution, but the current regulatory environment does not provide for their use, as the Road Safety Act 1961 predates any foresight of such technology.²³ E-scooter use on public roads remains illegal, despite its potential to reduce congestion, lower emissions, and plug holes in the existing public transport system if given the proper regulatory framework. This represents a significant missed opportunity for Dublin which could be addressed through a relatively minor legislative change and a willingness to learn from the example of other cities in Europe.

The regulatory framework for new technologies should also provide for innovative vehicle manufacturers who wish to make more connected, shared, autonomous and electrified vehicles. This is to the benefit of the overall climate action effort.

The regulatory environment should also be supportive of innovative sharing or last mile options that businesses want to implement as a staff offering. In the move toward a culture of sustainable transport usage, the role of business should be included and supported. Whilst the drastic reduction of car use in the city should be the goal, the role of the car will not be eradicated overnight and shared mobility options, including car sharing, can help to reduce the number of cars on the road significantly.

The adoption of new transport options must be seen as an opportunity, not as a problem. While new technologies may not immediately fit with the Irish transport system, the Sustainable Mobility Policy should find a way to make them an asset to the urban transport

²² Hydrogen Mobility Ireland, <https://hydrogenmobilityireland.ie/wp-content/uploads/2019/12/20190930-Hydrogen-Mobility-Ireland-Final-External-Report-1.pdf>

²³ Dublin Chamber Submission to DTTAS on Personally Powered Transporters, November 2019, https://www.dublinchamber.ie/DublinChamberofCommerce/media/banners/Dublin-Chamber-Submission-to-DTTS_PPT_November-1st-2019.pdf

landscape. Dublin Chamber recommends that the Sustainable Mobility Policy include provision to create a regulatory environment for the transport space that encourages innovation and smart city solutions.

Conclusion

Meeting Ireland's carbon emissions targets in the transport sector will require a real ambition for change and a real commitment to deliver. The Greater Dublin Area Cycle Network Plan is an example of the mismatch between these two factors, and it is important that this is not repeated in other areas.

Dublin Chamber welcomes the emphasis in the Sustainable Mobility Policy consultation on urban transport planning and encourages a commitment to investment in urban infrastructure accordingly. In finalising its Sustainable Mobility Policy, the Government must remain cognisant of time restraints in reducing GHG emissions. Waiting to see what emerges at the top of the alternative fuel or technology pile in 2040 will not serve the goal of tackling climate change well. Policymakers must recognise that significant investments in new public transport infrastructure, energy and fuel sources are required very soon.

The Government should look to international best practice in sustainable mobility, while also showing ambition for Ireland to be a world leader in certain innovative areas. Dublin Chamber's vision is of a high-density city in which people can live, study, work, and do business with a short commute by public transport or by means of active travel. There are a number of Government plans and policy initiatives already in place, including the NPF and MASP, which reflect the Chamber position on integrated planning for urban development and sustainable transport infrastructure. What Dublin requires now is delivery.