



Submission on the National Investment Framework for Transport in Ireland.

May 2021

Dublin Chamber is the representative body for businesses in the Greater Dublin Area, with a cross-sectoral membership spanning the spectrum from small start-ups to major multinationals. The Chamber is committed to improving the city region's business environment and quality of life in tandem, and strongly supports a vision of Dublin with sustainability, urban density, and liveability at its core. We are therefore a strong advocate for sustainable transport infrastructure investment, supporting projects such as BusConnects, the Greater Dublin Area Cycling Plan, MetroLink, DART+, Luas expansion, and the DART Underground project.

Dublin Chamber welcomes the opportunity to respond to the public consultation on the National Investment Framework for Transport in Ireland. This consultation comes at a critical time as the Covid-19 crisis has had a significant impact on transport, with restrictions reducing capacity and working from home policies changing the way we work and move around the city region. As the restrictions are lifted and the economy reopens, it is important to ensure that the GDA has an efficient, accessible, reliable, and resilient transport system. Most importantly, nationally we must have a plan for continued investment in our transport system which reflects population pressures, climate change challenges, and the need for ambitious long-term investment in new infrastructure to address existing deficits and prepare for future growth. We welcome the consultations alignment with the goals of the National Planning Framework. We also welcome the renewed focus on sustainability and adhering to the policies set out in the Climate Action Plan.

This consultation identifies four key priorities for the framework:

- Decarbonisation
- Protection and Renewal
- Mobility of People and Goods in Urban Areas
- Enhanced Regional and Rural Connectivity

Supporting the Project Ireland 2040 Vision

The National Planning Framework has established a clear direction for the sustainable development of Irish society in the coming decades, as articulated by its ten National Strategic Outcomes. How can transport investment support this vision?

Globally, cities are constantly being challenged to innovate and compete to attract both people and investment. With the significant population growth expected in the Dublin region in the coming years and an increasing urban population nationally, there is a demand to address the factors that will sustain that urban future as outlined in the NPF.

Significant and sustained capital investment is required to provide the Dublin and Mid-East region with world-class sustainable infrastructure capable of meeting the economic and social needs of its rapidly rising and ageing population. Historically, population projections for Dublin underestimate the numbers who move from other parts of the country to the city. We believe it is prudent to plan for an increase of Dublin's population of 400,000 persons by 2030, an increase of 30% on 2016.

Dublin Chamber's vision is for the Greater Dublin Area to have world-class infrastructure capable of supporting economic and social needs for the existing and future population. The continued investment in and development of Dublin's transport infrastructure is key to this. Dublin's aspiration to being a sustainable and resilient city is currently threatened and the poor state of Dublin's transport infrastructure is consistently cited by businesses as among the biggest challenges to the region's economic competitiveness. The transport projects and capital investments outlined in the NDP are vital in addressing these shortfalls.

Dublin Chamber recently made submissions on the review of the Greater Dublin Area Transport Strategy and the Review of the National Development Plan. In both the Chamber outlined the continued need for a modern integrated transport network that is linked to land-use policy across the metropolitan region. Continued investment in, and maintenance of, the road network is also vital in the broader region. Connectivity is key and Enterprise requires efficient and reliable road network infrastructure for the movement of goods and supplies, particularly in connecting to our Ports and Airports.

Our priorities include delivery of the following essential infrastructure projects, many of which are at advanced design and consultation phases.

- DART+ Programme
- MetroLink
- BusConnects
- Luas Expansion
- GDA Cycle Network Plan
- Pedestrian infrastructure and public realm improvements

Delivering the National Strategic Outcomes

How can transport investment support the delivery of compact growth in our towns and cities in the coming years?

Capital investment in urban infrastructure, most notably transport, will be critical to meet NPF densification targets by providing for the growing population in Dublin and Ireland's other cities. Ireland must not fall back into the past mistake of a scattergun approach to public infrastructure investment, which neglects to provide adequately for the growing populations of Irish city regions while simultaneously failing in its attempt to build sustainable critical mass in alternative locations

Dublin has particularly acute needs in public transport. The capital city region suffers from a legacy of underinvestment over many decades, with implications both for economic competitiveness and quality of life. For example, before the Covid-19 pandemic Dublin ranked among the most traffic-congested cities in the world, with an average of 154 hours lost per driver annually.¹ This traffic congestion in the Dublin region costs the Irish economy €350 million per annum by a conservative estimate, rising to €2 billion per annum by 2033.² These costs must be factored in to any analysis of costs associated with capital infrastructure investment.

In recent submissions to the four Dublin Local Authorities on their new development plans, Dublin Chamber has stressed the importance of transport orientated development. By prioritising height and density where transport infrastructure exists the city will be better served in achieving compact growth. The DART and Luas are key growth enablers in the city and MetroLink will provide similar benefits. Height and density should be prioritised in close proximity to public transport corridors, counteracting the previous narrative of car dependent communities.

In response to the ongoing problem of congestion within Dublin, the emerging trends in flexible working and the policy requirement for compact growth and urban density, the Chamber recently produced a report setting out our vision of Dublin as a 15 Minute City.³ Projects that help to achieve the urban planning vision of a 15 Minute City should be prioritised across all of the cities. The Chamber's vision for Dublin calls for significant investment in public transport and infrastructure projects, both within the city and wider GDA, to enable us to reach the level of public transport that enable modal change. To achieve this vision, similar investment in active transport, walking and cycling, and the public realm will also be required.

How can transport investment deliver sustainable mobility and encourage modal shift in the coming years?

Dublin Chamber has long been an advocate for greater use of sustainable mobility, active mobility and public transport, and has consistently communicated with Government at

¹ INRIX Global Traffic Scorecard 2019, <http://inrix.com/scorecard/>

² Dáil Question No: 346, John Lahart TD. Ref No: 1857/17, Proof: 348, Answered by the Minister for Transport Tourism and Sport Shane Ross

³ Dublin Chamber, 2020, 'Dublin: The 15 Minute City',

https://www.dublinchamber.ie/DublinChamberofCommerce/media/banners/Dublin_The-15-Minute-City.pdf

national and local level in relation to investment for the necessary infrastructure to support modal change and assist in transitioning to low carbon and climate resilient society.

According to the Canal Cordon Reports since 2010, there has been a trend of increasing modal share for sustainable transport modes, walking, cycling and public transport, with consistent levels of increase each year. In 2018 this figure peaked at 70%, its highest level since 2006.⁴ Correspondingly, there has been a year-on-year decline in proportional car usage. Dublin Chamber welcomes this trend but cautions that it will only continue if public transport services are made as attractive as possible. This will require frequent services (no less frequent than every 5 minutes) at peak times. Significant investment in active travel, both walking and cycling, infrastructure is also vital to increase modal share.

For Dublin to function as a modern, sustainable, and smart city with a high quality of life it needs an efficient and reliable public transport system. Dublin is significantly behind where it needs to be to meet the demands of the current population, a population that is predicted to grow steadily over the next few years. This is due to poor forward planning and a disconnect between land use and transport planning that has occurred over many for years. In particular, the failure to deliver underground mass transit solutions over the past several decades has left Dublin's transport system in a far from desirable state. Dublin Chamber has welcomed progress on the MetroLink and outlined its support for BusConnects and the DART+ and Luas Extension projects in recent submissions, and it is anxious that these urgently needed infrastructure projects get approval after many years of discussion. It is disappointing to see the DART Underground is not on the list of priority infrastructure projects in the existing National Development Plan. For Dublin to effectively manage its transport needs and reduce congestion, all of these large infrastructure projects need to be implemented.

Finally, integration of public transport and active transport modes is essential. 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. This situation unfortunately did not improve as frequencies were increased on the DART and commuter rail lines last year. Particularly during peak commute times, trains become increasingly crowded as they moved closer to the core of the city, and there are significant capacity issues which make transferring from one service to another undesirable, and in some cases, impossible. Without a reliable network across active travel and public transport, it will not be possible to realise or maintain modal change in cities.

How can transport investment in surface access support high-quality international connectivity via our ports and airports in the coming years?

As an island nation, international connectivity is vital to Ireland's economic wellbeing and has taken on a new importance in light of both Brexit and Covid-19, calling into focus the role of our ports and airports. Dublin Chamber has long argued that Ireland should position itself as a major aviation hub and establish direct connections to new markets in the Asia-Pacific region. With this in mind, we support the continued development of Dublin Airport which in normal circumstances welcomes over 80% of visitors to Ireland and will remain the main

reception point for tourists and business travellers in the post-pandemic future. The growth of Dublin Airport, including the development and effective operation of the North Runway, will play a vital role in national recovery.

Internal connections and transport to and from our airports and our ports is also vital, investment in key road infrastructure must be maintained and the MetroLink will provide a vital missing transport link from Dublin Airport into the city centre. With respect to development of other ports and airports, Dublin Chamber advises that departure from a city regions-based approach in terms of investment choices should take place only where it is necessary to meet evolving national requirements in the context of Brexit.

How can transport investment help us to transition to a low carbon and climate resilient society in the coming years?

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. Sustainability is an increasingly important factor in decision-making and is particularly relevant in terms of transport and evaluating future transport needs. According to the SEAI Emissions Report 2020 transport is the biggest emitter of energy-related carbon emissions, and emissions increased by 24% between 2012 and 2018 in line with economic growth. Private cars were responsible for the largest share of transport related CO2 emissions at 40%.⁴

Goal nine of the United Nations Sustainable Development Goals focuses on building resilient and sustainable infrastructure.⁵ When considering prioritisation of transport and infrastructure projects, we must now consider the environmental impact, the air and noise pollution impact, and the potential long-term environmental costs. Careful consideration of these factors will help us to reach our climate action targets that as a country we are already lagging behind on.

Active Transport

Dublin Chamber has long been a strong advocate for the progression of the Greater Dublin Area Cycle Network Plan. Due to the Covid-19 crisis there has been significant demand for greater infrastructure for active transport. Segregated cycle paths and dedicated active transport infrastructure and public realm improvements will support modal change and help to realise the Chamber's ambition of a 20% modal share for active transport, both walking and cycling, by 2030. Greater provision of park and ride facilities, secure bike parking and legislation for innovative micro-mobility schemes, such as e-scooters, are all important in supporting 'last mile solutions'. Further integration of bike sharing schemes with bus stops and train stations should also be examined to give public transport users options to get to their final destination.

Adoption of New Technologies

⁴ Sustainable Energy Authority Ireland, 'Emissions Report 2020', <https://www.seai.ie/news-and-media/emissions-report-2020/#:~:text=In%202018%2C%20transport%20was%20the,in%20line%20with%20economic%20growth>.

⁵ United Nations, Sustainable Development Goals, *Industries, Innovation and Infrastructure*, <https://www.un.org/sustainabledevelopment/infrastructure-industrialization/>

Dublin Chamber has stressed in recent submissions to Government the need for our strategies and policies to be forward-looking and for Ireland to become an early adapter of innovative projects and emerging sustainable solutions. Issues have already emerged such as the need to regulate for the provision 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, 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 adoption of new transport options, and the infrastructure to facilitate them, must be seen as an opportunity, not as a problem.

In terms of sustainability and the adoption of new fuel types the Chamber urges that in the development of an investment framework to take an ambitious and open approach to new technologies and fuel types. Consideration should be given 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.

Transport Investment

What challenges and opportunities exist with regard to decarbonising the transport sector?

Carbon reduction

Sustainability policy and the Government's aims towards carbon reduction is taking an increasingly significant role in all policy and investment considerations. Transport produces 20.2% of Ireland's emissions and is therefore a critical sector to target for emissions reduction.⁶ 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.⁷ 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 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.

⁶ Environmental Protection Agency, <https://www.epa.ie/ghg/transport/>

⁷ Dept. Climate Action, Energy & Environment, Action Plan to Tackle Climate Breakdown, Annex of Actions, pp. 46-52, <https://assets.gov.ie/10207/c8f59b1734af460fa310ddbe20e01388.pdf>

The GDA'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.

Failure to act

Failure to comply with the requirement to reduce carbon emissions will come at a high cost, both in terms of EU fines and missed opportunities for innovation and modernisation. This must be considered in any cost-benefit analysis of carbon reduction measures. In particular, Dublin Chamber notes that the expenditure on roads is considerable in comparison to that on public transport. Sustainable mobility is identified as a strategic objective in the National Development Plan; real commitment to this objective will require a shift in priorities in favour of public transport and active travel infrastructure. Furthermore, renewable energy infrastructure, energy efficiency, and overall energy security should be prioritised and considered in light of the NDP's Strategic Investment Priority of Climate Action.

New Technologies

In addition to active travel and public transport sector, as well as further support for EV charging infrastructure, the decarbonisation of the sector can be progressed through to commitment on delivery of projects for alternative fuel use in public transport. For example hydrogen and CNG (Compressed Natural Gas), while steps to utilise these fuels in the public transport system have been made in both Cork and Dublin, momentum needs to be achieved with delivering on larger scale piloting of their use. 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, electric and hybrid options should be considered widely in the Irish context.

Low Emission Zones

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.

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

What challenges and opportunities exist with regard to protecting and renewing the existing transport network?

Dublin has been consistently ranked among the most traffic congested cities in the world and suffers from a legacy of underinvestment over many decades, with implications both for economic competitiveness and quality of life. Within the context of the Covid-19 crisis, and its resultant impact on the economy and spending, it is essential that the Government does not repeat the mistakes of past recessions and practice false economy by failing to invest in capital projects appropriately. Particularly in regards to projects such as the Luas expansion and Dart+. These capacity and service enhancing capital projects are vital in ensuring that we have a public transport system that functions and meets the minimum requirements for the current population.

Before the Covid-19 pandemic Dublin ranked among the most traffic-congested cities in the world, with an average of 154 hours lost per driver annually.⁸ This traffic congestion in the Dublin region costs the Irish economy €350 million per annum by a conservative estimate, rising to €2 billion per annum by 2033.⁹ The challenge with protecting and renewing the existing transport network stems from the historic underinvestment and low base we are coming from, making the challenge a significant one.

Confidence in public transport

The Covid-19 crisis has also brought new issues to the fore in relation to our current transport network. Since the start of the crisis there has been a dramatic fall off in public transport usage.¹⁰ This reduction is a result of travel restrictions on individuals, reduced service offerings, and people avoiding public transport fearing risks of infection. There is a fear that the hard-won modal shift from the private car to public transport could regress after this crisis due to fears of infection. Dublin Chamber believes that steps should be taken by to restore confidence for public transport users, including an impact assessment on long-term views towards public transport and dramatically reducing over-crowding on public transport during peak times.

Active Travel

According to the Canal Cordon Reports since 2010, there has been a trend of increasing modal share for sustainable transport modes, walking, cycling and public transport, with consistent levels of increase each year. In 2018 this figure peaked at 70%, its highest level since 2006.¹¹ Correspondingly, there has been a year-on-year decline in proportional car usage. Dublin Chamber welcomes this trend but cautions that it will only continue if public transport services are made as attractive as possible. This will require frequent services (no

⁸ INRIX Global Traffic Scorecard 2019, <http://inrix.com/scorecard/>

⁹ Dáil Question No: 346, John Lahart TD. Ref No: 1857/17, Proof: 348, Answered by the Minister for Transport Tourism and Sport Shane Ross

¹⁰ Transformative Urban Mobility Initiative, 'The COVID-19 outbreak and implications to public transport – some observations', 2020; <https://www.transformative-mobility.org/news/the-covid-19-outbreak-andimplications-to-public-transport-some-observations>

¹¹ The National Transport Authority, 'Canal Cordon Report', 2019; https://www.nationaltransport.ie/wpcontent/uploads/2019/04/Canal_Cordon_Report_2018.pdf

less frequent than every 5 minutes) at peak times. Significant investment in active travel, both walking and cycling, infrastructure is also vital to increase modal share.

What challenges and opportunities exist with regard to improving mobility for people and goods in urban areas?

Dublin: The 15-Minute City

In response to the ongoing problem of congestion within Dublin, the emerging trends in flexible working and the policy requirement for compact growth and urban density, the Chamber recently produced a report setting out our vision of Dublin as a 15 Minute City. Dublin Chamber's vision is that within 15 minutes of active transport (i.e. walking or cycling) from their home, Dublin residents should:

- Have access to a key public transport hub to commute around the city to access work or higher-level services;
- Be linked to their local community through safe, accessible, and well-connected footpaths and cycle paths;
- Have access to an open greenspace and high quality public realm;
- Have facilities and services that facilitate local living and support a local economy.

Excellent public transport is essential to realise the vision of a 15 Minute City. In creating 15 minute communities, Dublin must also link them together and into the wider city using public transport. Our report details how modal change can be achieved if people can access reliable and efficient public transport within 15 minutes of their home, to commute to work or access the wider city.

One of the main issues in transforming a city like Dublin is to plan for modal shift to public transport while also ensuring that the transport system still functions for all its users, including businesses, those making deliveries, and those who need to use private cars, maintenance and emergency vehicles, and buses and taxis. The focus of public transport has historically been on bringing people from the outer edges of the city into the city centre. To increase connectivity, and support the objectives of a 15 Minute City, Dublin needs to move to a grid or network model of public transport that connects more areas to each other, rather than just connecting them with the city centre.

The Covid-19 crisis and its impact on public transport capacity has led to a significant roll out of enhanced active transport facilities across the city with significant uptake and success. Wider footpaths, public realm improvements, reduced car traffic access and new cycle lanes have resulted increased numbers using active transport. It is vital to ensure that the various cycling lanes across the city connect to each other and do not operate in silos. The aim of developing continuous dedicated and segregated cycling lanes should be pursued with ambition, and areas should be identified where connection points between the various cycling networks could be enhanced.

The BusConnects project represents the first in a series of essential improvements that are needed to deliver the world-class and sustainable public transport system that the city

needs. It also represents a change in public transport delivery in Dublin by reducing the need for bus routes to go through the city centre, and creating orbital routes better linking communities together, along with the roll out of segregated cycle lanes. This new approach will reduce interchange trips in the city centre, which is under significant congestion pressure, and support the vision of having more local, multi-use areas that are self-sustaining in the suburbs.

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. With the expansion of the night-time economy under review¹², both consumers, students and late-night workers will need to have access to these services to commute to and from home, places of employment, and entertainment and cultural venues.

Dublin's transport infrastructure, whether it is bus, rail, light rail or cycle share schemes, currently cater only to the traditional day-time commuter patterns and a shift in thinking and vision will be required to ensure that our night-time economy has the necessary infrastructure in place to support it. Dublin Chamber would like to see increased focus on the possibility of more late night services or possible 24-hour services to support the vision of a vibrant and diverse night-time economy in Dublin.

What challenges and opportunities exist with regard to enhancing regional and rural connectivity, including to our ports and airports?

Dublin Chamber recently made submissions on the review of the Greater Dublin Area Transport Strategy and the Review of the National Development Plan. In both the Chamber outlined the continued need for a modern integrated transport network that is linked to land-use policy across the metropolitan region. Continued investment in, and maintenance of, the road network is also vital in the broader region. Connectivity is key and Enterprise requires efficient and reliable road network infrastructure for the movement of goods and supplies, particularly in connecting to our Ports and Airports.

¹² Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media, 'Night-time Economy Taskforce', 2020, <https://www.gov.ie/en/publication/d86df-night-time-economy-taskforce/>