



Submission on the Review of the Transport Strategy for the Greater Dublin Area

January 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 in the Greater Dublin Area, 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 National Transport Authority's Review of the Transport Strategy for the Greater Dublin Area (GDA). This consultation comes at a critical time for the Greater Dublin Area, its residents, and its businesses. The Covid-19 crisis has had a significant impact on transport in the GDA, 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, the GDA must have a plan for its 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 review of the transport plan to bring it in line with the goals of the National Development Plan and the Regional Spatial and Economic Strategy as well as to respond to the impact brought of the Covid-19 crisis. We also welcome the renewed focus on sustainability and adhering to the policies set out in the Climate Action Plan.

This submission addresses four questions with reference to the NTA's issues paper:¹

1. How should we evaluate future transport needs?
2. What does the future of transport in this region look like to you?
3. What are the key components to a forward-looking transport strategy?
4. What are the things we should look at first while working on this plan?

1. How should we evaluate future transport needs?

¹ National Transport Authority, 'NTA Greater Dublin Area Transport Strategy', 2020, <https://www.nationaltransport.ie/wp-content/uploads/2020/12/NTA-GDA-Transport-Strategy-2020-final.pdf>

Urban population projections

Increasing levels of urbanisation are a worldwide trend, with over half of the global population now living in urban areas.² Ireland is no different, and the current and future demographic pressures facing the Greater Dublin Area must inform the GDA Transport Strategy. The population of Dublin City and its suburbs is set to grow by 20-25% to 1.41 million people by 2040. Dublin Chamber is a strong advocate for the economic, social, and environmental benefits of urban density as outlined in the National Development Plan (NDP). Failure to achieve adequate population density in urban areas is a significant contributor to Ireland's current housing, public transport, and infrastructure problems. In making the case for higher residential density we need to ensure that the facilities and infrastructure to sustain residents' needs are also in place.

The expected increase in urban density also enhances the viability and cost-effectiveness of public transport projects. The increased population and consequent demand for services and public transport will create communities that can sustain the facilities vital to their local economy. Creating a balance between sustainable levels of growth and demand on infrastructure is vital. However, some of Dublin's infrastructure had already reached maximum capacity prior to the Covid-19 pandemic. It is important that in line with the projections of population growth and urban density in the NDP & National Planning Framework (NPF) that the NTA ensures that capacity constraints do not occur in the future, population projections and development plans and frameworks are vital in terms of identifying where and when to invest in transport infrastructure.

The GDA post-Covid-19

The Covid-19 crisis has brought new issues to the fore in relation to public transport. Since the start of the crisis there has been a dramatic fall off in public transport usage.³ 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 the NTA 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.

In considering future transport needs the Transport Strategy must also be cognisant of the merging trends in regards to remote working and how they will impact on the transport system required. Another impact of the Covid-19 crisis is that people have changed the way that they work, which in turn impacts on the way they commute and move around the GDA. Remote and flexible working practices may have a notable impact on transport infrastructure usage and capacity in the future. Flexible work practices have significant potential to impact on public transport provision and capacity, for example staggering the start of the working day between 7am and 10am would have the potential to significantly enhance capacity at

² United Nations, 'Urbanization', <https://www.un.org/development/desa/pd/themes/urbanization>

³ 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-and-implications-to-public-transport-some-observations>

peak times. Initial feedback from companies is that post-crisis 81% will move to offer greater flexibility to their staff, however we also know that staff will be expected to be in the office 70-80% of the working week. Careful consideration needs to be given to how this emerging factor will impact on longer run transport trends and how it should be accommodated.

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 2006.⁴ 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.

Sustainability

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.⁵ 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.⁶ 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.

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. 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.

2. What does the future of transport in this region look like to you?

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

⁴ The National Transport Authority, 'Canal Cordon Report', 2019; https://www.nationaltransport.ie/wpcontent/uploads/2019/04/Canal_Cordon_Report_2018.pdf

⁵ Environmental Protection Agency, <https://www.epa.ie/ghg/transport/>

⁶ Dept. Climate Action, Energy & Environment, Action Plan to Tackle Climate Breakdown, Annex of Actions, pp. 46-52, <https://assets.gov.ie/10207/c8f59b1734af460fa310ddbe20e01388.pdf>

in the coming years and an increasing urban population nationally, there is a demand to address the factors that will sustain that urban future. Dublin needs to be an attractive city to sustain healthy population and economic growth. Mercer Global's City Attractiveness Index highlights 'the appeal of cities as a place to live, work and visit is a key aspect of a city's attractiveness and should be seen as the most important pre-condition for the future economic success of the city'.⁷ An effective, reliable and sustainable transport system is vital if that vision is to be realised in Dublin.

As stated in previous submissions to the NTA, the Chamber has long advocated for modal shift to public transport. 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 the emerging preferred route for the MetroLink and outlined its support for BusConnects and the DART+ West 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.

The continued prosperity of Dublin is dependent on an improvement in the city's public transport network. Dublin Chamber's Vision for Dublin 2050 recognises the importance of a world-class public transport to a high quality of life being available in the city. The people of Dublin desire a city that is easy to move around, and where public transport is reliable, sustainable and efficient. Dublin Chamber believes that the desired commute time of no more than 30 minutes should be achievable from anywhere within the M50 to the city centre by the year 2050⁸. 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.

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

⁷ Mercer Global, City Attractiveness Index, <https://www.mercer.com/what-we-do/workforce-and-careers/city-attractiveness-index.html>

⁸ Dublin Chamber, Dublin 2050, <https://www.dublinchamber.ie/getattachment/Business-Agenda/Dublin2050/Dublin-2050.pdf?lang=en-IE>

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 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 review⁹, 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. In particular, late night workers in the hospitality industry already face significant pressures in this area, as the lack of housing in the city has compounded the issue and has increased commute times for many workers. An often overlooked sector is that of night-time education,

⁹ 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/>

i.e. night courses and students who undertake study in the evenings or on a part-time basis According to Nightcourses.com there are currently almost 6,000 night time courses,¹⁰ listed across Dublin.

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.

3. What are the key components to a forward-looking transport strategy?

Sustainability and Climate Impact

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%.¹¹

Goal nine of the United Nations Sustainable Development Goals focuses on building resilient and sustainable infrastructure.¹² 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. A greater focus needs to be placed by the NTA on the supporting infrastructure to encourage and enable modal change. More must be done to cater for start-of-journey and end-of-journey active transport. Plans need to include steps to promote integrated active transport by enhancing facilities at key transport interchanges. Investment in public realm to improve accessibility and connectivity for walking is required. Greater provision of park and ride facilities, secure bike parking and legislation for innovative micro-

¹⁰ Nightcourses.com, Find Courses, <https://www.nightcourses.com/course-search/#byLocation>

¹¹ 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>.

¹² United Nations, Sustainable Development Goals, *Industries, Innovation and Infrastructure*, <https://www.un.org/sustainabledevelopment/infrastructure-industrialization/>

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.

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.

Adoption of New Technologies

The Greater Dublin Area Transport Strategy needs to reinforce Dublin's Smart City credentials. The strategy needs to be forward-looking and 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 the GDA Transport Strategy 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.

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. Integrated and digital ticketing is now essential. Cash is currently no longer being accepted on most public transport offerings in the GDA and post-crisis public transport users will have enhanced expectations of the service offering. Digital integrated ticketing is an issue that Dublin Chamber has raised previously and following the Covid-19 crisis there will be an acceleration of demand for digital only services. The rollout 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 90-minute fare period; 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 interchange. The Chamber calls for technology to be used to enhance integration of Dublin's public transport services. Buses, trams, and trains are not competitors but all essential components of Dublin's public transport offering. Greater collaboration is needed between the organisations that run these services to enhance the transport network and their passenger's complete journeys.

There is a need for greater development of existing electronic transport app services in Dublin. A single GDA 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.

4. What are the things that we should look at first while working on this plan?

Project prioritisation

The Chamber believes that prioritising the delivery of projects should take into consideration the following three factors;

- Projects which are 'shovel-ready' should be progressed without delay. In light of recent events and post-pandemic, there might be a temptation to go back and review plans and re-begin consultations on major infrastructure projects, the majority of which have been discussed and planned over the course of years. The reality of the pandemic and its impact and aftermath is that at most it has changed the dial by a few percentage points or has acted as a catalyst in speeding up or slowing down change and trends that were already happening. In the context of the Covid-19 crisis and its resultant impact on the Irish economy, it is essential that the Government does not repeat mistakes of past recessions and practice false economy by failing to invest in capital projects. The Government should also take advantage of the current very low costs of capital and invest in these badly needed infrastructure projects.
- Secondly, projects that help to achieve the vision of a 15 Minute City should be prioritised. 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.
- Finally, in its review of the Transport Strategy for the Greater Dublin Area and prioritising projects, the NTA must prioritise investment in projects that have sustainability to the fore. Increasingly the need for a sustainable approach to transport and energy usage is put on the agenda and the NTA must take on board and reflect this new approach. Prioritisation should be given to projects that provide transport infrastructure to enable low carbon travel. This includes active travel

infrastructure in the immediate term, and longer-term MetroLink and DART Expansion, including the DART Interconnector. Projects to accelerate the electrification of our transport system overall should also be evaluated.