

Greater Dublin Area Transport Strategy 2022-2044: Key issues

Introduction

This response to the NTA's Greater Dublin Transport Strategy 2022-2044 (hereafter 'the Strategy'). It is submitted by members of Dublin Bay South Green Party and is based on the Green Party's transport policy (available at <https://www.greenparty.ie/policies/transport-urban-development/>).

As the first part of the document shows, the Strategy ignores the consequences of the low level of investment to date in Dublin's public transport; its piecemeal approach to rail investment ensures that in the Greater Dublin Area (GDA) overall car usage will actually increase by 2044. The second part of the document shows the extent to which the Strategy fails to produce sustainable and inclusive mobility within the GDA and outlines the key measures needed to achieve this.

Slow progress on possible rail investments

The Strategy proposes a series of rail investments (Luas, DART) most of which were first proposed decades ago, started and then cancelled. During the intervening period the suburbanisation of the Greater Dublin Area has continued and extensive new housing developments are effectively inaccessible by public transport (Caulfield XXX). Certainly, there has been some modal shift away from the private car on the canal cordon around Dublin city centre, but overall car journeys in the GDA have continued to increase. At the same time the climate change crisis has become more acute with dramatic cuts in emissions

Continuing urban sprawl and accelerating climate change make accelerated investment in public transport more urgent than ever before. Outside of the major centres it is unrealistic to expect any significant reduction in car usage, whereas it is clear that in a city such as Dublin dramatic reduction in car usage is possible: the heavy lifting has to be done by Dublin. And this requires investment in rail, since international evidence suggests that improved bus services by themselves are unlikely to shift the demand for public transport on the scale required.

Instead of accelerating public transport investment, the Strategy essentially justifies continued delays and postponements. There is no explanation for the delays to date, and crucially no research on the consequences. Thus the Strategy announces that **Metrolink** will go to planning in 2022; this however represents a further delay given earlier announcements. There is no explanation as to why this could not have been done during 2021.

The same applies to DART+ West and DART+South West, for both of which Railway Orders will be placed during 2022. DART+ Coastal and Luas to Finglas only move to this stage in 2023 (Government approval of DART+ West was announced on 08/12/2021). The DART

Expansion Programme was central to the previous version of the Strategy (*Transport Strategy for the Greater Dublin Area 2016-2035*) yet hardly any of the proposed electrification had been started by the time the current Strategy was developed. The Strategy makes no comment on this failure.

The Strategy also commits to purchase hybrid (electric/battery-electric) carriages for DART for delivery from 2024 onwards (the contract with Alstom has just been announced in December 2021). The Strategy does not explain that the hybrid stock is only necessary because of the delay in completing the electrification of the new DART+ routes. Hybrid stock is more expensive than normal electric stock and according to some reports less reliable.

Other long-mooted investments (Luas to Lucan, Luas to Bray) are proposed during the lifetime of the Strategy but with no clear timetable; plausible further expansions (Orbital luas, reconfiguration of Green and Red lines) are suggested for post-2044, And as for the Interconnector (DART Underground) which was still included in the 2016 Strategy, it now is remains just a distant possibility for the period after 2044. DART Underground has been consigned to the category of desirable but actually unachievable national aims (e.g. Draining the Shannon, restoring the Irish language, etc...).

Investments in public transport infrastructure necessarily take time to yield benefits. However, for the NTA it seems that this is an argument for delaying them. Given the increasing threat of climate change, the argument is surely to bring these investments forward so that they would have an impact sooner and their impact on reducing emissions last longer.

So far major public transport investments such as Luas have been once-off initiatives. Consequently there has been little build-up of expertise, competence and institutional memory in either the construction firms or the state organisations commissioning the projects. Astonishingly, when construction of the last Luas links in Dublin ended there was no shovel-ready project ready to begin! By subjecting individual projects to repeated evaluations the pattern of stop-go-stop is built in.

Towards sustainable and inclusive mobility in the GDA

1. Focus on **legally-binding Climate Action GHG emissions reduction targets** (under Carbon Budgets and Climate Act). Transport needs to be seen as critical to zero-carbon society
 - a. Draft represents a **reduction of 45% from the 2018** GDA emissions total of 3.2 MtCO₂eq, which is not sufficient.
 - b. GDA including large population centre has potential to move away from car dependency. Given the need for our cities and urban centres with **larger populations to do the ‘heavy lifting’** in relation to the reduction in transport emissions, the strategy needs to align with our ambition.

2. **Adequate Strategic Targets** need to be set with a clear outline of how best to achieve this both through **provision of infrastructure and services**, and through **demand management measures**.
 - a. **Transformative changes** are required, to ensure we can move from incremental changes to systemic changes. Transformative long-sighted scenarios need to be outlined within the strategy .
 - b. The Transport Strategy states that implementation of the strategy is forecast to lead to a significant reduction in car mode share for the GDA from 57.7% in 2016 to 48.6% in 2042 for all trip purposes throughout the day. However the **modelling report reveals that full implementation of the strategy will result in no significant reduction in private car trips in the GDA and a small rise in car trips over the Eastern region**, going against objectives.
 - c. The **demand management measures should be integral to the GDA Transport Strategy rather than viewed as ‘additional’**. A number of these measures are assessed and discounted as national policy, but the strategy states that further assessment of various permutations of additional measures will be required to address the shortfall. The strategy needs to include measures LEZs, dynamic parking policy, congestion charges, deprioritisation of road space for private car traffic, removal of car parking spaces and reducing further max parking spaces per unit (currently 0 to 0.5).
 - d. **Car sharing** should be accommodated over private car ownership (Ref: ITF research on potential of car sharing)

3. **Congestion**
 - a. **Congestion of private car traffic should not be seen as a parameter to alleviate, but as a Demand Management Measure.**
 - b. The modelling report states that this is a simulation of a constraint, but only intended to represent what *could be achieved in the real world* by road pricing or car demand management measures.
 - c. **The current tools for demand management are all economic tools** (higher parking charges, congestion charges and fuel price increases). A **demand management tool based on travel time** may be more equitable but all should be part of the transformative change required.
 - d. Demand Management to reduce capacity should be through
 - i. **Reallocation of road space**

- ii. **Reprioritise time** e.g. traffic light time should prioritise active and public transport and slow down private car traffic
 - iii. **De-network the private car network** e.g. improve permeability for active travel, car free zones, filtered permeability, bus gates, introduce Low Emission Zones, active travel networks being prioritised.
4. **Design a network, rather than focussing on radial routes.** When we look at the various public transport maps, we see a very strong radial pattern in all cases from urban bus to regional bus and from light rail to commuter rail. The Strategy focuses largely on moving large numbers of people along ‘Corridors’ from the suburbs to the city centre at peak times. Yet journeys to work are now less concentrated in these times and anyway most journeys to work are in fact suburb-to-suburb. The journey to work is only one of the many journeys that people make – or want to make. The overarching objective of transport planning needs to shift to facilitating inclusive and sustainable mobility – enabling all Dubliners to move around their city.
- a. Some steps towards a more integrated network approach including **Orbital Core Bus Corridors** and a revised fare structure which will facilitate interchanges.
 - b. There are **large gaps in the network** - lack of connectivity will have implications for modal choice e.g. a trip for a family travelling from Rathmines to Dublin Zoo will take an estimated 56 minutes by public transport, 25 minutes by bicycle, on mostly unprotected roads, and 25 minutes by car.
 - c. Design a network providing transport services apart from congestion/peak times
5. Focus on **Accessibility and Inclusion**
- a. As outlined in the Preliminary Equality Assessment Report, it is necessary to engage with diverse groups early on - there needs to be a **clear equality-focussed strategy implementation plan with ongoing monitoring and evaluation.**
 - b. It is necessary to **also consider socio-economic background**, in addition to protected characteristics (age, gender, disability, civil status, member of the Traveller community, race, religious belief, family status), to ensure transport equity and to consider intersectionality, given that barriers to transport and mobility can compound people’s existing barriers to access of opportunity - to education, to employment, to amenities and to social interaction.
 - c. So too should **geographical location** be considered when engaging with stakeholders.
 - d. the Strategy aims to facilitate access to Dublin airport, despite the environmental damage air travel creates. It makes no reference to facilitating increased use of sea travel, for example by improved landside access for foot passengers at Dublin Port, Rosslare and maybe Dun Laoghaire.
 - e. Public transport is a public space which needs to be facilitated and protected. At its simplest this requires properly maintained public toilet facilities at mainline stations and major interchanges; enhanced security on DART and Luas and indeed on buses.

6. **Road User Hierarchy** needs to be adhered to through planning, design and delivery of the new transport system for Dublin
 - a. Adherence to DMURS Road User Hierarchy must be sincere, even if it results in reduced capacity and traffic flow for private car traffic.
7. **Liveability in neighbourhoods** must be considered as part of the Transport Strategy including reduction of on-street parking for more useful use of public space with improvements in planting, SUDS, seating, community spaces.
8. **Health needs to be included as a parameter** (Lancet study on better impact of climate action if health aspect included)
 - a. Improved environment for uptake of sustainable transport needs to see reduced car usage and reduced traffic capacity
 - b. Specific health aspects need to be addressed: Physical inactivity and sedentary car dependency, noise pollution, air pollution - none of which is addressed in any in-depth manner.

c. Noise Pollution

- i. **In the strategy modelling report the noise from goods vehicles** is projected to increase and the noise from cars is assumed to reduce as electric motors are quieter than internal combustion engines. This ignores that most noise is generated from the tyres slapping off the road surface and not the engine. Tyre noise is dominant from 30km/h and at 50km/h there is no difference in noise. The effect of a heavier fleet due to electrification and the trend to SUVs is not accounted for.
- ii. **People drafting the noise action plan** rely on purported noise reductions promised in the transport strategy as the extract for the Dublin noise action plan 2018-2023 below demonstrates:

“There are on-going sustainability policies being implemented at a local level that aim to increase the mode share of sustainable travel modes in the Dublin region with resultant reduction in noise and air pollution levels.

However, we know that there is no resultant reduction in car traffic from the changing mode share. **This misunderstanding is due to the shifting baseline of population growth, i.e. the modal share for car driving could reduce at the same time as absolute car numbers go up, with the associated noise and air emissions. This needs to be explained better, especially to policy makers.**

The noise action plan, referencing policies including the Transport strategy, stated that “integration of noise mitigation measures into their implementation will be sought where it is considered necessary”.

Therefore, a larger engagement on the noise issue was expected

- d. Recommendations on noise and air quality
 - i. **Better integration with noise and air action plans.**
 - ii. **SMART targets for noise and air pollution exposure reduction**

1. Annual target to reduce the amount of people who suffer exposure to unhealthy levels of noise and night-time noise
 2. Annual monitoring and reporting
 3. Annual targeted reduction in the number of people exposed to PM2.5 and NO2 levels exceeding the WHO guideline levels (or EU levels if the WHO are considered too stringent)
 4. Annual monitoring and reporting.
9. **Avoid-Shift-Improve** approach is one in which electrification of private car fleet is very much the last step after the Avoid and Shift stages.
- a. Citing growth in urban population as a reason for accompanying high private car modal share, does not seem to take into account that an approach of Avoid-Shift-Improve could actually succeed. Good planning, remote working, good siting of services, 15-minute neighbourhoods, well-designed public transport infrastructure and services, planned and integrated fully with active travel networks.

10. Monitoring:

- a. A Monitoring Report which assesses the implementation of the Strategy against the strategy objectives will be prepared by 2025 in advance of the review of the Strategy.” (Source: Section 19.2 Monitoring). The proposed timeline of a monitoring report by 2025 will not ensure that the policies and proposals of the Strategy are being implemented in a coordinated, effective and timely manner.
- b. **KPIs need to be significantly improved** and monitored annually.

11. Urban Freight

- a. The strategy needs to be clear as to what is required and where and how these can be implemented.
 - i. **Urban Consolidation Centres**
 - ii. **Last mile delivery** with smaller ecargo bikes and trikes.
 - iii. **Curfew** on delivery times for improved liveability of neighbourhoods.

Conclusion: The need for structures that enable vision and leadership

Announcing plans and then postponing them indefinitely exposes transport policy to justified ridicule. Sustained public transport investment offers the chance to make Dublin a sustainable but inclusive city, in which all can move around and connect without having to own a car. This needs a political leadership able to present to citizens a vision of how our city could be and able to follow through decisions to implementation. This in turn requires political structures that facilitate effective decision-making, structures that both generate accountability and offer real power so that attract politicians with ambition for the city. At its simplest this means a directly elected mayor to whom a Greater Dublin transport authority responsible.

