



Green Party Submission on Draft GDA Transport Strategy

Climate Change Goals & Strategic Modal Shift Targets

The Draft Transport Strategy projection of 2.0 MtCO₂eq represents a reduction in CO₂ emissions of 31% from the 2018 GDA emissions total of 3.2 MtCO₂eq, (not a reduction of 45% as stated on p.193 of the Strategy.) This is not aligned with the legally-binding targets of the Climate Act. Demand Management measures are identified as having the potential to make up the deficit in the emissions reductions, but these have not been made part of the Strategy.

Strategic targets for modal shift to public and active transport need to be set, aligned with current carbon emissions reduction targets. These strategic targets should clearly outline suitably ambitious modal shift targets to public transport and active travel, with clearly measurable indicators, monitored annually, such as modal shift to walking/cycling/scooting to school for those who live within a walkable and cyclable distance and modal shift to school bus for primary and secondary pupils.

The proposed modal shift outcomes contained within the draft need to be increased to achieve a similar ambition to that in leading active travel jurisdictions based on a commitment to emulate their approach in the Greater Dublin Area. The current strategy outlines a 12% modal share for cycling by 2042, up from 4% in 2016 which is not sufficiently ambitious. Ambitious shorter-term targets should also be set.

As an example of a leading jurisdiction, in the most recent Bicycle Account for the City of Copenhagen (2018) the bicycle share of trips to work and education situated within the city borders has risen from 41% in 2016 to 49% in 2018 - its target is for 50% bicycle share in 2025. In the category of all trips regardless of purpose the bicycle share is now 28% and the car share is 32%. The stated target of the City of Copenhagen's Bicycle Strategy and the Copenhagen

2025 Climate Plan is that maximum 25% of all trips in 2025 should be by car. Also useful for analysis are cities like Paris and Seville which have demonstrated the potential for rapid change towards active travel from a starting point lower than Dublin's.

Reduction in Private Car Usage

Implementation of the strategy is forecast to lead to a 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. Given the adverse health, economic and liveability impacts private car traffic has on the population, this reduction needs to be far greater by 2042. However the Modeling Report indicates 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. This is due to the shifting baseline of the projected population growth, which will result in similar numbers of private car trips remaining the same, or increasing, as demonstrated in the Modeling Report.

Competitive Advantage needs to be afforded to public and active travel, over private car usage. This needs to be reflected in

- a. Design of the active travel and public transport network, adhering to a sincere prioritisation of the road user hierarchy as laid out in DMURS.
- b. Design and planning of an integrated multi-modal (active and public transport) system should be considered from the start including public transport being high priority nodes on the active travel network.
- c. Urgent reallocation of road space to active travel and public transport which will result in a reduction in capacity for private car usage.
- d. Prioritisation of active and public transport with regard to time including traffic signaling to prioritise active and public transport over and above private car traffic.
- e. De-network the private car network (e.g. as long provided for in Groningen, recently achieved in Ghent and planned for Birmingham) and within the strategy provide for car free zones, filtered permeability, bus gates, introduction of Low Emission Zones.
- f. Consideration should not be given to alleviation of private car congestion to the detriment of public and active travel.

- g. Improve permeability for active travel networks and ensure they are the most competitive, more convenient, direct and cohesive routes.
- h. Enforcement of traffic laws, including working with the Garda Síochána and Local Authorities to enforce illegal parking on paths and cycle lanes and use of cameras mounted on buses and other public vehicle fleets to gather data on traffic law breaches.

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 such as LEZs, combined parking management policies, congestion charges, deprioritisation of road space for private car traffic in order to achieve suitable ambition in reduction of carbon emissions and modal shift away from private car usage to active and public transport. We would be eager to engage on detailed proposals in these areas.

EBike and EMobility Potential

Given the range that e-bikes can cover, the corresponding increase in 'cyclable' distances, active travel needs to be taken into account far beyond the short distance trips traditionally considered cyclable. A recent study carried out by CREDS researchers at the University of Leeds has found that e-bikes, if used to replace car travel, have the capability to cut carbon dioxide (CO₂) emissions in England by up to 50%, about 30 million tonnes per year¹,

Ebikes need to be considered as a strategically important and prioritised mode of transport within the overall strategy. In the overall sustainable transport hierarchy, it could be considered as a separate mode between cycling and public transport, so that further consideration can be given to where ebikes can expand the catchment areas for public transport, ensuring a far wider reach of multi-modal transit. This should be taken into account particularly in relation to inter-urban travel and acknowledging the very car dependent rural and suburban areas of the Greater Dublin Area, where there is less access to public transport.

¹ <https://www.creds.ac.uk/wp-content/pdfs/CREDS-e-bikes-briefing-May2020.pdf>

Ebikes enable diverse demographics to embrace active travel, particularly those with mobility issues and those who need to travel longer distances, in addition to the traditional benefits of transport equity that cycling brings for low income households and for those who do not drive. The Transport Strategy needs to consider how to achieve the best possible environment for the take up of active travel using ebikes, particularly by novice cyclists or people returning to cycling. Since perception of safety is one of the key barriers to the take up of active travel. reduction in car usage and restriction in car access is required, and a cohesive and direct network of cycling infrastructure needs to be rolled out - to provide the least hostile, safest, most convenient and comfortable environment for those embracing active travel.

Ebikes and emobility options have additional significant health (physical, mental, social) benefits over Electric Cars, namely enabling physical activity, social interaction, reduction of tyre noise pollution, reduction of air pollution from tyre particulate matter, and reducing the necessary storage in premium public space in the city and town centres.

Ebike share schemes for both passenger mobility and urban delivery usage in city and towns within the GDA should be incorporated into the solutions for emissions reductions in the strategy, Proposed bike share schemes should include ebikes, ecargo bikes and trikes, for the widest possible target user groups.

Liveability of City and Town Centres

Liveability in neighbourhoods must be considered as part of the Transport Strategy in order that people are attracted back to living in city and town centres in the GDA, and adhering to the principle of Avoid-Shift-Improve to avoid long commutes, as well as the concept of the 15 minute city. Liveability needs to be considered when designing and routing public transport and include a focus on removal of on-street parking, additional seating for walkability, and reduction of noise and polluted air from private car traffic and public transport.

A more ambitious Urban Freight Delivery strategy should be included, not solely to examine the feasibility of various measures but a clear strategy outlining how and where Urban Consolidation Centres could be integrated with last-mile delivery with priority to ecargo bikes and trikes and then, smaller electric delivery vehicles. Consolidation of delivery loads and coordination of return delivery loads e.g. waste and packaging should be planned. Delivery

curfews need to be included for the city and all major towns in the GDA to improve their liveability and to ensure priority of street space is given to active travel and public transport.

Health Impacts & Monitoring

The Draft Transport Strategy includes a monitoring report by 2025. This should be amended to an annual report in order to ensure that adequate progress in delivery is achieved.

Noise Pollution: The Modeling Report for the Transport Strategy indicates that noise is projected to increase. Noise from EVs is assumed to reduce the noise pollution from ICE. However, this discounts noise from tyres which is dominant from 30km/h and at 50km/h and does not take into account the effect of a heavier fleet due to electrification and the trend to larger, heavier cars. Annual targets to reduce the number of people who suffer exposure to unhealthy levels of noise and night-time noise should be outlined, monitored annually and actions delivered accordingly.

Air Quality Targets: Annual targets to reduce the number of people exposed to PM2.5 and NO2 levels exceeding the WHO guideline levels should be outlined, monitored annually and actions delivered accordingly. It should recognise the contribution of non-exhaust particulates to air pollution. The Strategy should place particular emphasis on reducing the number of short trips for which pollution abatement technologies are far less effective. It should emphasise the electrification of the vehicles responsible for the highest volumes of tailpipe emissions.

Design

Just as we should emulate the ambition of jurisdictions with the greatest success in active travel, the Strategy should commit to learning from the design standards and approaches which they have developed over recent decades and to applying similar approaches in the GDA.

In addition, the Strategy should set out how the necessary expertise will be transferred, developed and applied in the GDA, including the oversight measures to ensure high quality walking and cycling provision in all redesigned and new infrastructure. It should set out a prioritisation system for the redesign of infrastructure. In this context it is surprising to see some of the routes identified in the last GDA Cycle Network Plan have been omitted from the new draft, for reasons which are not in any way specific.

The Strategy includes infrastructure for all modes and therefore should specifically commit to preventing any repeat of the approach which has typically been followed for non-active travel projects in the GDA in recent years, including for public transport projects. That has been to carry out initial design work without considering active travel users. Then, having lost much of the flexibility which would have been available had active travel modes been considered from the start, the schemes would provide poorer quality designs for people walking and cycling. Unfortunately this problem, evident in all major road schemes over recent decades has also been evident in the design of light rail schemes, was very evident in the initial Bus Connects designs (and is still an issue with Bus Connects) and is now very evident in the initial designs for the Dart+ West. The Strategy must commit to prioritising walking and cycling in practice.

In order to expand the catchment area of public transport and for successful multi-modal transit, public transport stops and stations need to be high priority modes on the active travel network, as origin and destination nodes. Similarly, public transport stops need to prioritise active travel users - in access to and from public transport stops, in proximity of sheltered, secure cycling/scooting parking, in provision of age-friendly seating and good lighting. Given the growth of ebikes and escooters, the traditional walkable and cyclable distances for public transport has now increased and an integrated multi-modal public and active transport system needs to be planned and designed accordingly.

Delivery

Rapid delivery is a further reason for emphasising the reallocation of road space. The Strategy should prioritise designs which can be implemented within current road alignments or with minimal additional land and should implement them on the basis of trials with subsequent approval and amendment to be based on consideration of the results of the trial. This has seen the rapid delivery of quality active travel infrastructure in response to the Covid pandemic and restrictions and should be core to the active travel elements of the Strategy.

The same approach of working within existing road alignments has also delivered very well for prioritisation of buses, such as the bus gate on Bachelors' Walk and should be core to the public transport elements of the Strategy. This is not to say that the wider Bus Connects redesigns

should not happen, but the improvements to bus priority which are needed should not wait for the wider designs where they can be made within existing road alignments.

Where major work is being done, the Strategy should commit to agreement with relevant utilities so that outstanding work such as sewer and water main replacement is done simultaneously. This element of the Strategy should be confirmed by the relevant Government Departments and issued to bodies under their aegis as this seems to have been a significant problem in recent years.

A very slow delivery process is set out for the additional light rail elements of the Strategy. It's not clear how much of this slow pace is considered an inevitable characteristic of light rail delivery and how much is a decision to defer these projects to later years. There have been suggestions that the light rail delivery process in future will be even slower than the most difficult section of light rail built to date with the cross-city Luas link. This doesn't make sense.

If a decision to defer these investments is being made it lacks any explanation of why such a deferral might be considered appropriate. The timescale needs to be revisited as the greater level of transfer to public transport and active travel which the revised strategy will require to be compliant with the Climate Action and Low Carbon Development Act (as amended) will require far more rapid delivery of light rail. There may be a case on a number of routes identified for both Bus Connects and light rail for an immediate redesign of the route for active travel and bus priority within the current road alignment, using bus gates and one-way sections where necessary, and then moving rapidly to design of the light rail route.

Focus on Accessibility and Inclusion

The Draft Transport Strategy includes a Preliminary Equality Assessment Report, outlining the need to include an equality-focussed strategy implementation plan. It is necessary to also consider socio-economic background, in addition to protected characteristics as outlined in the Equality Assessment report to ensure transport equity given that barriers to transport and mobility can compound societal inequities.

The network and services need to accommodate travel outside of traditional peak times for commuters and facilitate journeys by diverse groups of people for multi-purpose trips.

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