

# Greater Dublin Area Transport Strategy 2022-2042

Submission to Public Consultation

January 2022

Dear NTA Team,

Thank you for the opportunity to make a submission to the Greater Dublin Area Transport Strategy. I have grouped my submission, below, by the following topics:

- Ambition and targets
- Cycle Network Plan
- Public Transport
- Reduction in car use

If you would like to follow up on anything in this submission, please feel free to reach out to me on ooconnor@cllr.dlrcoco.ie.

Kind regards,

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# **Ambitions and Targets**

While the ambition of the Draft Strategy is greater than any other transport strategy produced in Ireland to date, I feel it still doesn't go far enough. We are facing into climate breakdown, congestion gridlock, an inactivity crisis, an urban sprawl problem and worsening air/noise quality. The next generation of younger people in urban and suburban areas are deciding not get driver's licenses or cars, electric or otherwise. This trend is likely to continue. Against this backdrop, a reduction in mode share of car use from 58% to 49% is very unambitious. I understand that this is not a target, but it is an outcome based on the measures in the Draft Strategy. This means the Draft Strategy needs more in it to reduce the number of cars on the road.

## Cycle Network Plan

As a councillor for some of the worst severed areas by the M50 I strongly welcome the inclusion of two new routes to provide permeability: at Ballinteer Road and at Carrickmines.

One thing I feel is missing from the strategy is a citywide quietway network. This has worked effectively in London, even before the introduction of LTNs. Given the planning sagas and infrastructure costs of building cycle tracks on main roads, quietways can be a relatively quick and cheap solution to enable cycling for all ages and abilities by marking quietways across the Greater Dublin Area.

The 2013 Cycle Network Plan ended up being most well-known for the glacial pace of its implementation. There is still no continuous segregated cycle route from the Dublin suburbs into the city centre. I hope that the cycle network plan under the current strategy will be implemented much quicker.

According to the CSO National Travel Survey 2016, 71% of trips in Dublin are under 8km (vs. 50% outside Dublin). There's huge potential to even switch many of the 8km+ journeys to cycling. E-bikes are now the largest selling electric vehicle in Europe, and growing. The ambition of the cycle network plan should reflect this untapped potential.



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## Public transport

If the Luas Green line is not being upgraded to a Metro due to backlash, then the capacity increase on the green line must be detailed and timeline in the strategy. Development is happening at a ferociuos pace in the area and there's absolute certainty that the additional capacity will be needed along this corridor. We can't wait for the Sandyford-UCD line, which the report states is actually non-viable at the moment. Bus provision to the Stepaside/Ballyogan area in particular needs to be increased further than is currently planned under Bus Connects, as the level of demand will grow faster than any green line capacity improvements can be brought onstream.

A greater emphasis on bus provision to the beginning of trails in the Dublin mountains is imperative to enable visitors to enjoy these amenities on weekends and summer evenings. Public transport provision shouldn't be purely seen as something that "gets people out of their cars" at peak times. For the many people who don't drive, particularly younger people, increased bus services enables access to amenities that are currently hard to reach.

Improving the pedestrian environment is key to getting more people on public transport. For most public transport users, walkingis part of their public transport journey. Bringing all our streets up to DMURS standard at a minimum through a widespread high quality public works programme is an essential part of this. NTA Sustainable Transport Grants need to cease being granted to local authorities who design junctions where pedestrians have multiple-staged crossings. The NTA need to change the whole approach to who gets prioritised at signalised junctions - light sequences need to heavily prioritise pedestrians, particularly near public transport stops.

#### Reduction in car use

#### Traffic circulation plans

In cities such as Ghent, and soon Birmingham, traffic circulation plans have been implemented with great success. In 1977, Groningen introduced theirs overnight. The current strategy is sorely lacking in anything with this level of ambition which would drastically reduce cross-city car congestion. 40 years later in 2017, Ghent implemented their plan overnight too.



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Taking a citywide approach like this would have immediate benefit to all sustainable transport modes, air quality and road safety all over the Greater Dublin Area. Done together with demand management on the M50 and an aggressive roll-out of Low Traffic Neighbourhoods, the right motorised traffic can be kept on the right roads.

#### Traffic law enforcement

The Dublin transport network grinds to a halt with law breaking by motorists. Whether it is drivers crashing their cars into level crossings or the Luas, parking on the Luas tracks, queuing up in bus lanes, parking on cycle lanes, footpaths and across crossings. People are being encouraged to drive because that is the only way they will get protection or priority moving through the city. It's imperative that a zero tolerance approach and high level of enforcement be taken with this law breaking. The only way to do this is through camera-based enforcement. There will never be the level of resources or will in the Gardaí Síochána to hold motorists to account for so-called minor infractions that undermine the sustainable transport network. The NTA should also include in their strategy that an increase in fines and reform of the fining system overall be prioritised. Adopting measures from overseas such as income-based traffic fines (Finland) and progressive penalties for repeat offenders (Netherlands) should be considered. Even if the NTA don't have a direct role in this, I feel they should be taking the lead in advocating for it.

### Congestion charges

I am disappointed that it appears that congestion charging/low emissions zones was not properly outlined in the strategy. Options were laid out clearly in the Dublin Air Quality Draft Action Plan by the local authorities so it is disappointing that the NTA are not taking the lead on it. The congestion charging should be fair and equitable to gain public acceptance.

### Workplace parking levies and employer modal share disclosures

There is an onus on workplaces to begin prioritising sustainable modes of transport to a greater degree. I would like to see greater emphasis on a workplace parking levy in the plan as has been successfully rolle out in Nottingham and will soon be rolled out in Leicester. The NTA should be openly putting pressure on the Department of Finance to charge benefit in kind on parking spaces provided to employees, including in the public sector.



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The Netherlands have adopted a system whereby employers with >100 employees must disclose the modal share of their staff, with penalties in 2026 for employers that have not reduced employee commute emissions by a certain amount. The NTA should be actively and aggressively moving past the soft measures on Smarter Travel Workplaces which have not made more than incremental improvements across the country.

The NTA need to take the lead on these initiatives so they don't become a race to the bottom among local authorities who still want to cling onto a transport system that encourages car dominance.



