

27 November 2015

To: gdatransportstrategy@nationaltransport.ie

Re: National Transport Authority Consultation on Greater Dublin Area Draft Transport Strategy

Dear Sir or Madam,

please find attached An Taisce's submission on the National Transport Authority's Draft Strategy for the Greater Dublin Area.

I would be grateful if you could acknowledge receipt of this consultation document and keep us apprised of any relevant further developments.

Yours Sincerely,

Ian Lumley,
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1.0 Introduction

This Draft Strategy needs to achieve a timetabled and clearly implementable programme to address the current mounting congestion and traffic generated pollution and climate emission impact in the Greater Dublin Area (GDA) and surrounding counties.

Current land use transport planning in and around the GDA is worsening the situation through the combined failure of the major public transport measures and National Transport Policy for reducing congestion through the 49 actions provided in the Department's "[Smarter Travel: A New Transport Policy for Ireland 2009 - 2020](#)".

Congestion is back to 2008 boom time levels. This increases polluting transport greenhouse gas emissions which have risen by 2.1 % in 2013 over 2012 levels. The 2014 data which is due for formal publication by the EPA shortly is projected to show a similar increase and puts Ireland on the path to way overshooting EU 2020 climate targets when combined with agricultural emissions and inadequate action on heating.

<http://www.epa.ie/pubs/reports/air/airemissions/GHGprov.pdf>

Congestion also affects economic productivity, slows down public transport and service vehicle movement, undermines cycling and causes local air pollution in particle emissions, particularly from diesel vehicles. Parallel to this is the impact of car dependence in contributing to unhealthy lifestyles and obesity.

The immediate and longer term cost of congestion, climate, air pollution impact and inefficient land use, is not sufficiently quantified in strategic planning and decision making.

We submit that the Draft Strategy be assessed and reviewed with regard to the following considerations:

2.0 General Comments.

The most positive element of the Draft Strategy is the manner in which it clearly defines transport corridors and the evaluation of options for each corridor.

However an overriding critique is of the lack of clear timetables and targets for modal shift, congestion reduction and emissions and other relevant considerations. A strategy is meaningless without timetables and targets.

While an impressive vision of a 2035 network is set out for the GDA, this follows a pattern of adopting ever distant transport planning targets. Since the Dublin Transport Initiative in the early 1990s, there has been a succession of ambitious transport plans and strategies, while the

reality has been the abandonment of any effective strategic planning generally and major projects including the DART Interconnector, Metro North and Metro West.

The strategy needs to be revised and be linked to clearly timetabled actions and targets up to 2020 and each 5 yearly period thereafter.

3.0 Climate Emission Targets.

Section 6.10 of the strategy under Environment fails to define the level of emission reduction targets needed for the GDA to achieve the appropriate level of national emission reduction.

Specific climate targets need to be set out in the strategy which are adequate to meet Ireland's binding 2020 obligations and the strategic planning for the much higher emissions cuts that will be needed post 2020.

4.0 Air Pollution

Section 6.10 of the strategy on Environment fails to define the level of air quality targets needed for the GDA to achieve public healthy standards in accordance with World Health Organisation guidelines.

The increase in road freight, failure to improve the emission standard of buses, and a higher ratio of diesel cars to petrol has also renewed concern on air particulate PM10 emissions.

The air pollution data and targets in the strategy need to be reviewed. Current air pollution modeling for the GDA is based on emission calculation standards that rely on motor industry supplied and certified data. In view of the mounting level of information that other vehicle manufactures

In the area under the most direct control of the NTA bus procurement and operation standards, the most progress achievable emission standards should be sought.

5.0 Modal Shift to Public Transport and Cycling.

The Smarter Travel policy contained clear targets to stabilise the total kilometres travelled by the national car fleet at 2009 levels and reduce car based workplace travel from 65 % to 45% by 2020. It set out 49 specific actions including biennial reports on progress starting in 2010. The parallel National Cycling Framework Strategy adopted a target of 10% of all journeys being by bicycle by 2020.

The Draft Strategy adopts the Smarter Travel 45% target for the GDA. However if the Smarter Travel 2020 target is to be met nationally, a significantly higher target for modal share in the GDA is required than the 45% target for car based workplace travel. This is because other Irish urban centres and well as the more dispersed population in other regions make a 45% target difficult, where the GDA has a critical mass of density, travel demand and transport routes to achieve a higher target.

6.0 Demand Management on M50 and Radial Corridors.

Section 5.9 of the Draft Strategy is inadequate on specific adoption of effective demand management measures.

In 2005 An Bord Pleanála granted permission for extra lanes on the M50 without demand management control. It attached a condition (No. 5) that within three years of the completion of the project a study on “Demand Management Measures” be published, but providing no obligation that any such measures be implemented.

In 2014 a report was carried out by an NRA led working group three years after the roads 2011 completion. This determined that by 2011, 12% of the route was exceeding “safe operating capacity” in the busiest lanes at peak times. A range of actions was recommended including extended tolling which was rejected by the current and previous transport ministers last year. All that is being proposed for “consideration” by the NRA at present is variable speed limit guidance through electronic flow modeling. The fundamental requirement to curtail traffic levels has not been addressed.

In 2014 An Bord Pleanála gave consent for a National Roads Authority supported Kildare County Council application to add two lanes to 15 km section of the M7 between the Newbridge and Naas interchanges. The decision failed to address and mitigate the impact of [induced traffic](#) from the wider catchment of the M7 and M9 from the surrounding counties and the downstream impact on the Red Cow interchange on to the M50. The Board attached a condition on future monitoring, but no demand management restriction.

The NTAS strategy needs to adopt clear demand management targets for the M50 and main arterial motorway corridors.

7.0 Public Transport Linking Western Radial Travel Demand Centres

With the abandonment of Metro West, planning is required for great public transport provision in the western radial area, to link Dublin Airport and major employment centers in Blanchardstown, Leixlip and other locations which have growing transport demand.

8.0 Integration with Design Manual for Urban Roads and Streets

The Departments of Transport Tourism and Sport and Environment Community and Local Government jointly published a very well considered [Design Manual for Urban Roads and Streets](#) which needs to be put into practice everywhere. The 2015 DECLG Planning Policy Guidelines also provide overriding principles for a better planned low carbon future.

9.0 Land Use Planning Integration with Sustainable Transport

The Draft Strategy does not properly address the role of the NTA as a prescribed body in the planning process. The last three years have seen a significant level of planning applications for new employment around the main Irish urban centers, almost all car based like the Kerry Group research centre outside Naas near the M7 with 780 free surface parking spaces.

An Bord Pleanála made two significant decisions approving additional parking and car based motorway orientated retail development in the Greater Dublin Area at Kildare Village and Liffey Valley. The Board also extended the permission for 10,200 car spaces at Dublin Airport. This will encourage more car based travel from the catchment area in counties Kildare and Laois feeding into the M7, and undermine modal share with rail and bus.

The current review of the National Spatial Strategy to create a new National Planning Framework which will be on a statutory basis, needs to set out a positive vision with legally enforceable planning guidance for walkable urban and rural communities, with a significant shift from car dependency to cycling and public transport in the Greater Dublin Area.

10.0 Parking Provision and Charges.

Section 5.11 of the Draft Strategy is inadequate on specific adoption of effective parking management measures, through reduction in parking provision and parking charges. Sustainable transport policy and targets are undermined unless parking availability is curtailed and subject to financial charges in all location and for all user categories

Car parking provision, particularly if free, reinforces car dependence, urban sprawl, wasteful land use, exacerbates congestion, generates traffic demand, as well undermining the physical, social and economic base of both urban centres and rural areas. These issues have been analysed within the United States where they are most acute. One of the most influential commentators is Donald Shoup in "The High Cost of Free Parking" (Updated Edition 2011). This shows that free parking far from being a benefit, fuels wasteful land use congestion and sprawl. The concept of free parking must be curtailed with a charging regime to incentivise modal shift against car use.

11.0 Emergency Measures

New public transport investment will take some time in planning and implementation.

Immediate emergency measures to reduce traffic generation, congestion and emissions can be taken immediately and include new park and ride services, workplace and school travel plans, cycling enhancement and the promotion of car sharing.

- Provision of Park and Ride facilities targeted at enhancing non car based travel to major employment clusters.
- Promotion of workplace travel plans including car sharing where public transport or cycling is not a viable option.
- Promotion of school travel plans to significant reduce car based travel
- Promotion of increased and safe cycling use, [including extension of 30kph zones](#).

These measures can be achieved through a task force involving more efficient co operation between Department of Transport NTA, Local Authorities, communities and business and environmental organisations.

An Taisce with its established role in school travel and overview on spatial planning and development nationally can play a key and constructive part in this.