An Taisce
The National Trust for Ireland

20150302-NTA-GDA

Transport Strategy Consultation
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2 March 2015

Re: Public Consultation on the preparation of a new Transport Strategy for the Greater Dublin Area

Dear Sir or Madam,

Attached is a submission with regard to the public consultation on the preparation of a new Transport Strategy for the Greater Dublin Area.

Please acknowledge our submission.

Yours Sincerely,

James Leahy
Honorary Secretary
secretary@antaisce.org

An Taisce – The National Trust for Ireland

Submission to the consultation on the preparation of a new Transport Strategy for the Greater Dublin Area

Prepared by: James Leahy, secretary@antaisce.org

2nd March 2015

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1.0 Introduction

This submission is a response to the National Transport Authority's Public Consultation regarding the preparation of a new Transport Strategy for the Greater Dublin Area with a deadline of 2nd March 2015[1]. An Taisce welcomes the study and the opportunity to make a submission. An Taisce would like to be included as a stakeholder on further workshops or consultations on this subject.

1.1 Local Context

An Taisce has for many years being advocating for a review of transport plans for Dublin and strongly welcomes the willingness to reconsider the flawed *Draft Greater Dublin Area Draft Transport Strategy 2011-2030*.

In particular:

- An Taisce strongly supports the Department of Transport's policy*, Smarter Travel: A Sustainable Transport Future – A New Transport Policy for Ireland 2009-2020* and has repeatedly referred to it in its planning submissions. It can be cited internationally as a best practice example of a national transport policy.
- An Taisce attended the oral hearing for the Metro North project and made a detailed submission on the project. The submission said that the benefits of the project were being oversold, especially due to the end of the Celtic Tiger bubble. It criticised the way that the cost-benefit analysis only compared a single low cost low benefit bus or Bus Rapid Transit option with the Metro North proposals. An Taisce has always stressed that the Metro North should have been compared to a combination of BRT routes including the Swords Road and the Dublin Port Tunnel.
- An Taisce advised the NCAD graphic designer Aris Venetikidis on his masters project on mapping of public transport in Dublin[2]. This was not a detailed design, rather an attempt to illustrate how Dublin could benefit from a 'network effect' if it created a dense integrated public transport network. It also illustrated the potential for lower cost Bus Rapid Transit to be more widely deployed to achieve this network effect in a low-density city like Dublin. In particular note that a number of different BRT routes are shown serving Swords and the Airport rather than a single LRT or rail line. See the Dublin network diagram in the appendices.
- In September 2013 An Taisce made a submission on the *Draft Integrated Implementation Plan 2013-2018*[3]. This submission[4] was strongly supportive of the projects included in plan to 2018 and called for them to be funded. In particular it welcomed: the rail connections between Heuston and Docklands which would complement the later Dart Underground; and the decision to consider BRT on three routes on five radial corridors.

[1] https://www.nationaltransport.ie/consultations/public-consultation-on-the-preparation-of-a-new-transport-strategy-for-the-greater-dublin-area/
[2] http://www.venetikidis.com/ArisV/DUBLIN_TRANSPORT_MAP.html
[3] http://www.nationaltransport.ie/wp-content/uploads/2011/12/Integrated_Implementation_2013-2018.pdf
[4] http://www.antaisce.org/articles/national-transport-authority-draft-integrated-implementation-plan-2013-2018

- To show support for the *Integrated Implementation Plan 2013-2018* and illustrate the potential benefits for the city An Taisce published a series of schematic maps of the proposals in the plan and what they would look like with Dart Underground completed. It can be seen that for the first time Dublin would have an integrated transport network. The maps[5] are included in an appendix to this document.
- An Taisce made submissions to the two Swiftway public consultations[6]. These were generally strongly supportive, while including a detailed review of the proposals[7].
- An Taisce welcomed the North Dublin Transport Study and made a detailed submission[8].

Therefore, An Taisce finds itself in the position that it is strongly supportive of the projects in the published Integrated Implementation Plan 2013-2018 and now welcomes a fresh look at transport provision beyond 2018.

1.2 National Context

There is, however, confusion at the national level. An Taisce strongly supported the vision as set out in *Smarter Travel: A Sustainable Transport Future – A New Transport Policy for Ireland 2009-2020*. No national longer-term strategy has been published which complicates the task of creating a *Greater Dublin Transport Strategy*. An Taisce commented on this in a submission to *Investing in our Transport Future - A Strategic Framework for Investment in Land Transport* in November 2014[9].

Smarter Travel: A New Transport Policy for Ireland 2009 – 2020 sets out a series of overriding policy objectives in Chapter 3, which are still relevant, summarised as follows:

1 *Future population employment growths will predominantly take place in sustainable compact forms which reduces the need to travel for employment and services;*
2 *500,000 more people will take alternative means to commute to work to the extent that the total share of car commuting will drop from 65% to 45%;*
3 *Alternatives such as walking, cycling and public transport will be supported and provided to the extent that these will rise to 55% of total commuter journeys to work;*
4 *The total kilometres travelled by the car fleet in 2020 will not increase significantly from current levels;*
5 *A reduction will be achieved on the 2005 figure for Greenhouse gas emissions from the transport sector.*

In addition The *National Cycling Policy Framework 2009* proposed 2020 target of 10% of journeys by bicycle needs to be higher in the Dublin area. Major progress on cycling levels has been achieved in Dublin City Centre, which needs to be extended across the wider region.

[5] http://www.antaisce.org/articles/taisce-published-schematic-map-dublin-transport-proposals
[6] http://www.antaisce.org/articles/submission-swiftway-bus-rapid-transport-proposals-dublin
[7] http://www.antaisce.org/articles/swiftway-bus-rapid-transit-–-swordsairport-city-centre-submission
[8] http://www.antaisce.org/articles/north-dublin-transport-study-submission
[9] http://www.antaisce.org/articles/irredeemable-failure-address-climate-strategic-framework-investment-land-transport

1.3 Climate Change Context

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, and puts Ireland on a path of way overshooting EU 2020 Climate targets[10].

On 23rd April 2014, before the draft land transport strategic framework document was published, the Government agreed on national climate policy and legislation in the form of the General Scheme of the Climate Action and Low-Carbon Development Bill 2014. On the same day the Government also agreed its National Policy Position on Climate and Low-Carbon Development[11].

Government agreed on national climate policy and legislation in the form of the General Scheme of the Climate Action and Low-Carbon Development Bill 2014. On the same day the Government also agreed its National Policy Position on Climate and Low-Carbon Development.

At page 2 the National Policy Position commits to 'an aggregate reduction in carbon dioxide (CO2) emissions of at least 80% (compared to 1990 levels) by 2050 across the electricity generation, built environment and transport sectors'.

The policy position states:

> *'The series of national plans will be adopted and reviewed on a structured basis ... to ensure a coherent and comprehensive policy across all key sectors, and to provide maximum clarity and policy certainty for business and stakeholders generally. The structural basis for national plans on mitigation and adaptation will reflect Government commitment to transparency and inclusiveness. Accountability on national policy will include annual reporting to Dáil Éireann'.*

The Transport Strategy must achieve real year-by-year reductions in greenhouse gas emissions from transport to support national an international targets.

[10] http://www.epa.ie/pubs/reports/air/airemissions/GHGprov.pdf
[11] : http://www.merrionstreet.ie/wp-content/uploads/2014/04/National-Policy-Position.pdf

2.0 Basic Principles

A basic principle that came out of the Dublin Crisis Conference in the 1980's and the Dublin Transport Initiative in the 1990's was that there would be no new radial road capacity built within the M50. This principle has held since then and has radically changed the transport context in Dublin City, ultimately leading to the HGV Permit Scheme and an overall switch from car to public transport on radial corridors into the City Centres as shown in the Dublin City Canal Cordon Counts[12].

An Taisce puts forward the following basic principles to be considered:

- There is a need for year-by-year real reductions in greenhouse gas emissions from transport. It is not enough to have local emission reductions by electrifying transport if the electricity is not low emission electricity. Soft measures have a large role to play but if they are not delivering emission savings then reductions will be required elsewhere.
- The strategy should focus on the hierarchy of modes, focusing in order on creating walkable neighbourhoods, cycling, local integrated public transport, high capacity public transport and private transport.
- The need for a basic level of public transport service within the Dublin urban area of the city within the M50 plus Blanchardstown, Lucan and Clondalkin. This could be a integrated network of radial and orbital services (or a grid of services) with an integrated fare system, information, and guaranteed minimum frequencies.
- Having built the inter-urban motorways there is no need for a commitment to build no more lanes for general vehicles on these roads. Increasing demand should be catered for through intelligent management of the roads and through the provision of alternatives such as bus or freight vehicle lanes.
- The use existing national rail infrastructure should be maximised. There is a need for a long-term plan for this network.

2.1 Skills

The strategy requires an ambitious set of actions many of which Ireland has no experience of delivering. Much has been achieved with the creating of the National Transport Authority and the consolidation of functions and skills within it. There is a need to review skills within the transport sector in Ireland and up-skill to delivery any new strategy. Relevant expertise will be required from abroad. In particular skills are needed for the:

- Ability to function as a competent urban passenger transport authority;
- Development and management of the public transport services through PSO contracts;
- Contracts;
- Developing advanced management techniques, service quality and ridership
- on the bus mode, which is the transport workhorse of any city;
- Bus Rapid Transit;
- Developing comprehensive multi-modal fare structures and fare products;

[12] https://www.nationaltransport.ie/publications/statistics/

2.2 Legacy Projects

There are a number of legacy projects that are clearly no longer appropriate such as the Eastern Bypass Motorway and the Metro North project. Transport practice and the local context have moved on and it is now time to consider whether these projects should be dropped rather than shelved.

For example having built the Dublin Port Tunnel and moved freight traffic out of Dun Laoghaire Port it is no longer appropriate to reserve a corridor for a motorway from Dublin Port to Sandyford. Dun Laoghaire Rathdown's Blue Line BRT proposal to use the corridor from UCD to Sandyford should be considered instead.

Another example is Metro North. Having built a surface light rail line from St. Stephen's Green to Parnell Square it is surely wrong to build a second parallel underground light rail line along the same route. The North Dublin Transport Study is welcome as it includes sensible alternatives. See this link for An Taisce's submission[13].

2.3 Democratic Accountability

Many of the choices required in developing a transport strategy are not technical ones, which can be decided on by comparing different options from a transport model and comparing the pros and cons of the different options. Transport is integrated with planning and the choices made have a profound effect on the city. These are political choices and need democratic decision-making and accountability. This is the main flaw of the current institutional arrangements. There is a need for a mayor or assembly elected by the Greater Dublin Region to oversee the NTA's work the Greater Dublin Region and to hold it accountable to the people.

[13] http://www.antaisce.org/articles/north-dublin-transport-study-submission

3.0 Comments on the Hierarchy of Modes

The strategy should go from general principles to actions based on the hierarchy of modes. Brief comments follow on particular modes.

3.1 Building Walkable Neighbourhoods

For urban areas a strategy is needed to retrofit neighbourhoods using the excellent new Design Manual for Urban Roads and Streets[14]. For rural areas the Design Manual for Urban Roads and Streets applies to local towns and village too. There is also an overarching need to plan rural areas to avoid urban generated car services sprawl. An Taisce has recently published five Principles for Sustainable Rural Settlement to show how this can been done. The strategy must address these issues and not just try to cater for the resulting traffic[15].

3.2 Cycling

The National Cycle Policy Framework is currently under review by the Department of Tourism Transport and Sport but is still the relevant policy and is strongly supported by An Taisce.

The new Strategy should focus on implementation of the *National Cycle Policy Framework (NCPF)* at a GDA level. The strategy needs to reference the NCPF. The 19 objectives of the NCPF are listed as follows here. Specific points marked #### are added in relation to GDA and the NTA's role:

- **Objective 1**: Support the planning, development and design of towns and cities in a cycling and pedestrian friendly way.
    - #### There are still too many developments with impermeable layouts. There needs to be greater attention to providing filtered permeability so as to give pedestrians and cyclists a comparative advantage against motorised modes. New schools need to be located within town centres, not on the outskirts of towns (as has happened for example in towns in Co Kildare in recent years). The Design Manual for Urban Roads & Streets (DMURS) sets out government design guidance in relation to urban (re)design and is often not being adhered to.

- **Objective 2**: Ensure that the urban road infrastructure (with the exception of motorways) is designed / retrofitted so as to be cyclist-friendly and that traffic management measures are also cyclist friendly.
    - #### We support the implementation of the GDA cycle network plan. A coherent plan is required as a matter of urgency for Dublin's city centre with an emphasis on addressing the 10 worst junctions in the city and the cyclist-hostile one-way street system - http://www.dublincycling.ie/cycling/10worst. 30kph needs to become the default speed limit for urban areas, starting with residential areas, areas around schools, urban villages

[14] http://www.environ.ie/en/Publications/DevelopmentandHousing/Planning/FileDownLoad,32670,en.pdf
[15] http://www.antaisce.org/publications/principles-for-sustainable-rural-settlement

etc. http://cyclist.ie/2015/02/jakes-legacy-vigil/ Bus lanes (where much commuting cycling takes place) need to be re-examined from the cyclist's perspective. At an immediate intervention, giant bicycle logos need to be painted onto bus lanes at regular intervals. Taxis in bus lanes needs to be reviewed, or alternatively a code of practice adopted by taxi drivers.

- **Objective 3**: Provide designated rural cycle networks especially for visitors and recreational cycling.
    - ###The strategy needs to reference the EuroVelo 'Capitals' (Moscow to Galway via Dublin) Route #2 http://www.eurovelo.com/en/eurovelos/eurovelo-2 as well as the variety of planned routes along waterways and along the coastline.

- **Objective 4**: Provide cycling-friendly routes to all schools, adequate cycling parking facilities within schools, and cycling training to all school pupils.

- **Objective 5**: Ensure that all of the surfaces used by cyclists are maintained to a high standard and are well lit.

- **Objective 6**: Ensure that all cycling networks -both urban and rural - are signposted to an agreed standard. Work is required on the development of that standard.

- **Objective 7**: Provide secure parking for bikes.
    - ### Build on the city centre cycle parking strategy being prepared for Dublin City Council. Address the huge problem of bike theft also, and the finding that approximately 17% of cyclists whose bikes are stolen do not return to cycling: http://www.dublincycling.ie/cycling/one-six-give-cycling-dublin-result-bike-theft-finds-survey-1500-people

- **Objective 8**: Ensure proper integration between cycling and public transport.
    - ### Secure cycle parking provision at all interchanges is needed as a matter of urgency. Bus Aras is a case in point. All major rail stations have an appalling standard of cycle parking The exploration of bikes being carried by LUAS & Dublin Bus needs to be developed urgently. Many international examples exist.

- **Objective 9**: Provide public bikes in cities.
    - ### Provide for the steady expansion of *dublinbikes* and their development in other GDA areas, and use the momentum generated by the success of the dublinbikes scheme to advance supporting policy measures and interventions (e.g. the North Quays cycle route).

- **Objective 10**: Improve the image of cycling and promote cycling using "soft interventions" such as promotional campaigns, events etc.
    - #### This needs to be written into the GDA strategy.

- **Objective 11**: Improve cyclists' cycling standards and behaviour on the roads.

- #### This needs to be written into the GDA strategy. Liaise with Cycling Ireland & DTTAS to ensure the developing national cycling standards project is fit for purpose.

- **Objective 12**: Improve driver education and driving standards so that there is a greater appreciation for the safety needs of cyclists.
  - #### This needs to be written into the GDA strategy.

- **Objective 13**: Support the continued provision and further development of fiscal incentives to cycle.

- **Objective 14**: Provide appropriate levels of, and timely, financial resources towards implementing the NCPF.
  - #### To reach the 10% modal share for cycling target in 2020, the target in the GDA needs to be 15-20%. Funding for cycling provision should represent at least 10% of the transport budget for the GDA too.

- **Objective 15**: Introduce changes to legislation to improve cyclist safety.
  - #### The NTA needs to work closely with the technical section of DTTAS and take the lead on this.

- **Objective 16**: Improve enforcement of traffic laws to enhance cyclist safety and respect for cyclists.
  - #### The NTA in collaboration with An Garda Siochana need to take the lead on this.

- **Objective 17**: Develop a structure that can coordinate the implementation of activities across the many Government Departments, Agencies and NGO's.
  - #### This is still not happening. Implementation of the NCPF is too piece-meal and uncoordinated. All local authorities need better-funded cycling planning teams.

- **Objective 18**: Provide design professionals with suitable training / guidance to develop and implement the policies of the NCPF. Support the deepening of knowledge of the subject of planning for cyclists in Ireland.
  - ### There are too many traffic schemes being advanced in the GDA with scant attention paid to either the Design Manual for Urban Roads and Streets or the National Cycle Manual. This problem needs to be addressed.

- **Objective 19**: Evaluate the cycling policy and monitor the success as the measures are implemented.
  - #### The NTA needs to take the lead on this. At present only Dublin City Council carry out the recommended BYPAD audit, to evealuate progress on development of cycling.

3.3 Public Transport

We consider that the potential of Bus Rapid Transit (BRT) should be adopted as the most cost efficient way of strengthening the critical mass and efficiency of public transport corridors, achieving modal shift from car, and creating of a network with ease of route

interchange. However, for the centre city integration of mass public transport the reactivation of the Dart Underground Heuston to Docklands scheme is essential for the interconnected transport system which Dublin, as a European capital needs.

In 2009 An Taisce advised an NCAD graphic designer Aris Venetikidis on a project looking at mapping of public transport in Dublin[16]. The project was an illustration of the potential of transport and transport information rather than a detailed plan. The maps illustrate the potential of integrating transport in Dublin i.e. of serving everyone in the urban area with an integrated network of bus, Bus Rapid Transit, Luas, DART and heavy rail. The strategy needs to deliver a system like this and communicate the system to the public. See the map in the Appendices of this submission.

An Taisce has illustrated the potential of various projects to integrate transport in Dublin and the national rail network in its submission to the North Dublin Transport Study[17].

Having built Luas Cross City and the Swiftway BRT to Swords the idea of running Metro North parallel to the Luas from Stephen's Green to Parnell Square and then parallel to the Swiftway to Swords is crazy. We note that the passenger forecasts for Metro North have been reduced by the RPA to 12,000 passengers per direction per hour. In An Taisce's submission to the Metro North Oral Hearing we called for the Metro North to be compared to three BRT routes on: the Ballymun corridor, Swords corridor and the Dublin Port tunnel. This can easily deliver 12,000 passengers per direction per hour. It would also serve both the Ballymun and Swords road corridors in Dublin City and provide fast express access to the Airport and Swords. If a rail option is still to be considered it should server areas that do not already have a high quality BRT or LRT service and not duplicate existing investment.

An Taisce would like one of the eliminated options to be reconsidered, namely heavy rail HR9 Heuston to Swords via Phoenix Park Tunnel. We note that this was eliminated due to the distance from Islandbridge to Heuston and the need to transfer to get to the City Centre Core. However, we believe one key factor has not been considered the potential benefits for the National Rail Network.

An Taisce suggests continuing the option to connect with the Northern Line at Donabate and with the Dublin City – Airport – Swords Port Tunnel BRT. This would open up the following opportunities:

- Passengers from Dublin Airport or Swords would have a direct express Port Tunnel BRT service to the City Centre.
- Passengers from Dublin Airport or Swords could also use the new Dart service and interchange at Donabate (Balbriggan DART), Broombridge (Maynooth and Dunboyne DART and Luas Green) or Heuston/Islandbridge (Kildare DART).
- It would also facilitate the potential to run a electrified national rail service from Belfast – Donabate - Dublin Airport – Broombridge – Islandbridge – Cork.

In the context of planning to 2035 the national rail network must be considered. An electrified direct Belfast – Cork services is not an outlandish proposal.

[16] http://www.venetikidis.com/ArisV/DUBLIN_TRANSPORT_MAP.html
[17] http://www.antaisce.org/articles/north-dublin-transport-study-submission

See the map in the appendices, which illustrate this proposal. Obviously, this is just a preliminary proposal that An Taisce has offered as a suggestion. A full analysis of the transport needs of the Greater Dublin Area and a consultation process is required and An Taisce welcomes the opportunity to contribute to this.

3.3 Private Transport

The current land use and transport planning in and around the Greater Dublin Area is worsening the situation of private vehicle use and does not comply with national transport policy for reducing congestion provided in the Department of Transport's policy, *Smarter Travel: A Sustainable Transport Future – A New Transport Policy for Ireland 2009-2020*.

Congestion is back to 2008 boom time levels. This increases transport greenhouse gas emissions which have risen by 2.1 % in 2013 over the previous year's levels. Congestion 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. Unsustainable patterns of car dependent mobility are being exacerbated with consequent economic cost and contribution to unhealthy lifestyle and obesity.

The investment programme for several public transport initiatives outlined previously will take some time to achieve and with rising congestion there is a need for emergency measures.

We submit that two complementary actions are also needed:

1. Suspension of funding for and preparation of tenders for the addition of two lanes on the M7 between Naas and Newbridge forthwith;
2. Immediate measures to reduce traffic generation, congestion and emissions including park and ride, workplace travel plans, cycling promotion (by prioritising the systematic implementation of the National Cycle Policy Framework) and promotion of car sharing.

3.3.1 Suspension of funding for M7 Upgrade

As a general principle, new road objectives must be discontinued. Investing further public monies on oil dependent transport infrastructure is wasteful. In 2014 An Bord Pleanála gave consent for a National Roads Authority supported Kildare County Council application to add two lanes to 13 km section of the M7 between the Newbridge and Naas interchanges. This will encourage more car based travel from the catchment area in counties Kildare and Laois feeding into the M7, undermine modal share with rail and bus and encourage extra traffic from the Greater Dublin Area and beyond to funnel into the Red Cow junction and M50 and an undermine the national modal share targets set out in Smarter travel.

The problem is compounded by the manner in which local authorities are continuing to grant or extend permission for developments with large areas of surface parking feeding into the motorway system around Dublin, including the Kildare Village Outlet, the Liffey Valley Shopping Centre and the extending of a ten year permission for 10,200 surface car parking spaces in March 2014 at Dublin Airport.

In addition to this, new employment developments are receiving approval such as the Kerry Group project on the M7 outside Naas, *without the conditions needed to achieve Smarter Travel targets and relieve congestion.* The targets need to be higher in the Greater Dublin Area if the overall national Smarter Travel targets are to be achieved by 2020.

Condition 7 of the 2005 An Bord Pleanála Consent for the additional lanes to the M50 required that within three years of completion of the scheme (which occurred in 2011) demand management measures be published. A steering group was set up by the NRA with the relevant local authorities who published its report on 29 April 2014[18]. This revealed the issue of mounting congestion on the M50 as stated in the Executive Summary:

> *"by November 2011 12 % the route was exceeding "safe operating capacity"… "in the busiest lanes at peak times"*

and

> *"the congestion which has occurred within the last two years reflects this and has in turn resulted in more frequent incidents and collisions"*

and

> *"A number of key sections of the M50 are already beginning to experience some form of congestion".*

The report as required by the An Bord Pleanála condition recommended a number of "demand management" measures including, extended tolling and *Smarter Travel* measures. The former option was rejected by the then Minister for Transport after the publication of the report on a number of grounds including concern at toll evasion generating traffic through residential areas.

[18] http://www.nra.ie/policy-publications/strategic-reports/m50-demand-management-rep/M50-DM-Executive-Summary-April2014.pdf.

The report on the 16th February 2015[19] that traffic on tolled roads has increased by 20% was presented as a good news story by a government spokesperson yesterday, where it was stated:

> *'The Government says new figures on the use of motorway tolls show a real and tangible indication of growth in the economy'*

In the ensuing adverse response to this, the NRA[20] announced on the same day that:

> *one of the options the Government could consider was reducing the speed limit to about 60 km/h which would help offset "the accordion effect"*

The NRA also reiterated:

> *the option of multi-point tolling on the orbital route as a "demand management measure".*

However, the tolling option was promptly rejected by Transport Minister Pascal Donohue previously. The speed limit measures proposed by the NRA will be futile if traffic generation is allowed to increase.

It is obvious that major demand management is required on the M50. The well established induced demand effect will encourage and facilitate extra traffic filtering from the M7 from the County Kildare catchment and beyond into the Red Cow junction, which is untenable. We submit that proceeding with the M7 additional lane scheme would undermine the strategic planning the Dublin area needs to reduce downstream congestion on to the M50.

Widening motorways only creates induced traffic demand which then overwhelms the next stretch of motorway down the road along with the local roads to the motorway junctions. Adding road capacity spurs people to drive more kilometres, either by taking more trips by car or taking longer trips than they otherwise would have. Turner et al (2011) call this the "fundamental rule" of road congestion: adding road capacity just increases the total number of miles travelled by all vehicles. This is because, for the most part, drivers aren't charged for using roads. So it's not surprising that a valuable resource, given away for free, leads people to use more of it[21].

Adding road capacity worsens the problem it claims to fix. The alternative that should be considered is to make the third lane a bus lane from Kildare to Dublin. This can allow bus services to distribute passengers from Leinster to employment centres in West Dublin and North Kildare. It provides a real alternative to congestion.

[19] http://www.rte.ie/news/2015/0216/680491-nra-roads-tolls-economy/
[20] http://www.irishtimes.com/news/ireland/irish-news/plan-to-lower-m50-speed-limits-to-cut-congestion-1.2105928
[21] http://www.econ.brown.edu/fac/Matthew_Turner/papers/published/Duranton_Turner_AER_2011.pdf

3.3.2 Measures to reduce Traffic Generation, Congestion And Emissions

In the absence of extended tolling or road pricing which has been rejected, and large scale public transport investment which is not in place, the most immediate and cost effective action is to implement a range of *Smarter Travel* policies and actions. Immediate measures to reduce traffic generation and congestion on M50 and other roads, and to reduce emissions include 'park and ride', workplace travel plans, a systematic approach to cycling promotion (as per the NCPF above), and the promotion of car sharing.

There are a range of immediate measures which can be taken to reduce congestion, with most of these set out in Smarter Travel Workplace and School Travel Guidance which has been developed in documents produced by the NTA:

- Department of Transport's policy, *Smarter Travel: A Sustainable Transport Future – A New Transport Policy for Ireland 2009-2020*;
- National Transport Authority - *Workplace Travel Plans - A Guide for Implementers*;
- National Transport Authority - *Achieving Effective Workplace Travel Plans Guidance for Local Authorities*;
- National Transport Authority & An Taisce - *Tool Kit for School Travel*.

These documents suggest several measures, including:

1. Provision of 'Park & Ride' facilities targeted at enhancing non-car based travel to major employment clusters;
2. Promotion of workplace travel plans including car sharing where public transport or cycling are less viable options;
3. Promotion of school travel plans to significantly reduce car based travel;
4. Promotion of increased and safe cycling use including extension of 30kph zones. On this point, we strongly commend your recent circular issued to Local Authorities requiring examination of speed limits in residential areas and housing estates.[22]

These measures can be achieved through a task force involving more efficient co operation between the Department of Transport, National Transport Authority, National Roads Authority, local authorities and other relevant stakeholders.

In conclusion, if we are to reduce congestion, improve road safety and achieve the Smarter Travel targets, the above two complementary actions need to be addressed as a matter of urgency.

[22] http://www.dttas.ie/press-releases/2014/minister-donohoe-issues-local-authority-circular-requiring-examination-speed)

4.0 Conclusions

An Taisce welcome this opportunity to comment at an early stage. We will be developing further proposals for transport in Dublin over the coming months and publishing them on our website

5.0 References

Laird et al (2005) [http://www.sciencedirect.com/science/article/pii/S0967070X05000909]
Martens (2004) [http://www.sciencedirect.com/science/article/pii/S1361920904000100]

6.0 Appendices

Appendix A: 2015 Map by An Taisce

Appendix B: 2009 Map by © Aris Venetikidis

An Taisce Cork - Dublin - Airport - Belfast Intercity Train Proposal

Drawn by James Leahy | 19th January 2015 | (c) James Leahy 2015 | www.antaisce.org

An Taisce
The National Trust for Ireland

Routes

- DART1 Bray - Maynooth
- DART2 Hazelhatch - Balbriggan
- DART3 Howth Shuttle
- DART4 Navan North - Docklands
- DART5 Hazelhatch - Balbriggan
- Luas Red
- Luas Green
- BRT 1
- BRT 2
- BRT 3
- Port Tunnel Express BRT
- Arrow 1 Dundalk - Connolly or Islandbridge
- Arrow 2 Kildare - Spencer Dock
- Arrow 3 Gorey - Pearse or Connolly
- Arrow 4 Longford - Grand Canal Dock
- Intercity 1 Belfast - Dublin Airport - Dublin - Limerick - Cork
- Intercity 2 Sligo - Spencer Dock
- Intercity 3 Rosslare Harbour - Pearse or Connolly
- Intercity 4 Galway / Ballina / Westport - Heuston
- Intercity 5 Tralee / Waterford - Dublin

Projects Included on This Map by An Taisce

Existing DART, Luas, Commuter Arrow and Intercity services with some reorganisation of train services due to opportunities from new infrastructure.

Luas Cross City Green line under construction

NTA's proposed three Swiftway Bus Rapid Transit services

NTA's proposed Navan DART rail line.

Dublin Port Bus Rapid Transit option from North Dublin Transport Study

Heuston - Airport DART option from North Dublin Transport Study with assumed stop locations and An Taisce's proposal to extend this to the Balbriggan line.

An Taisce's proposal to run Intercity trains from Cork to Islandbridge, then via the existing Phoenix Park Tunnel to Liffey Junction, then via a new tunnel under Glasnevin to the Airport, then overland to the Balbriggan line and on to Belfast. This would require electrification and should be allowed for in the long-term.

Advantages

Provides a long-term plan for Ireland's Intercity Rail Network

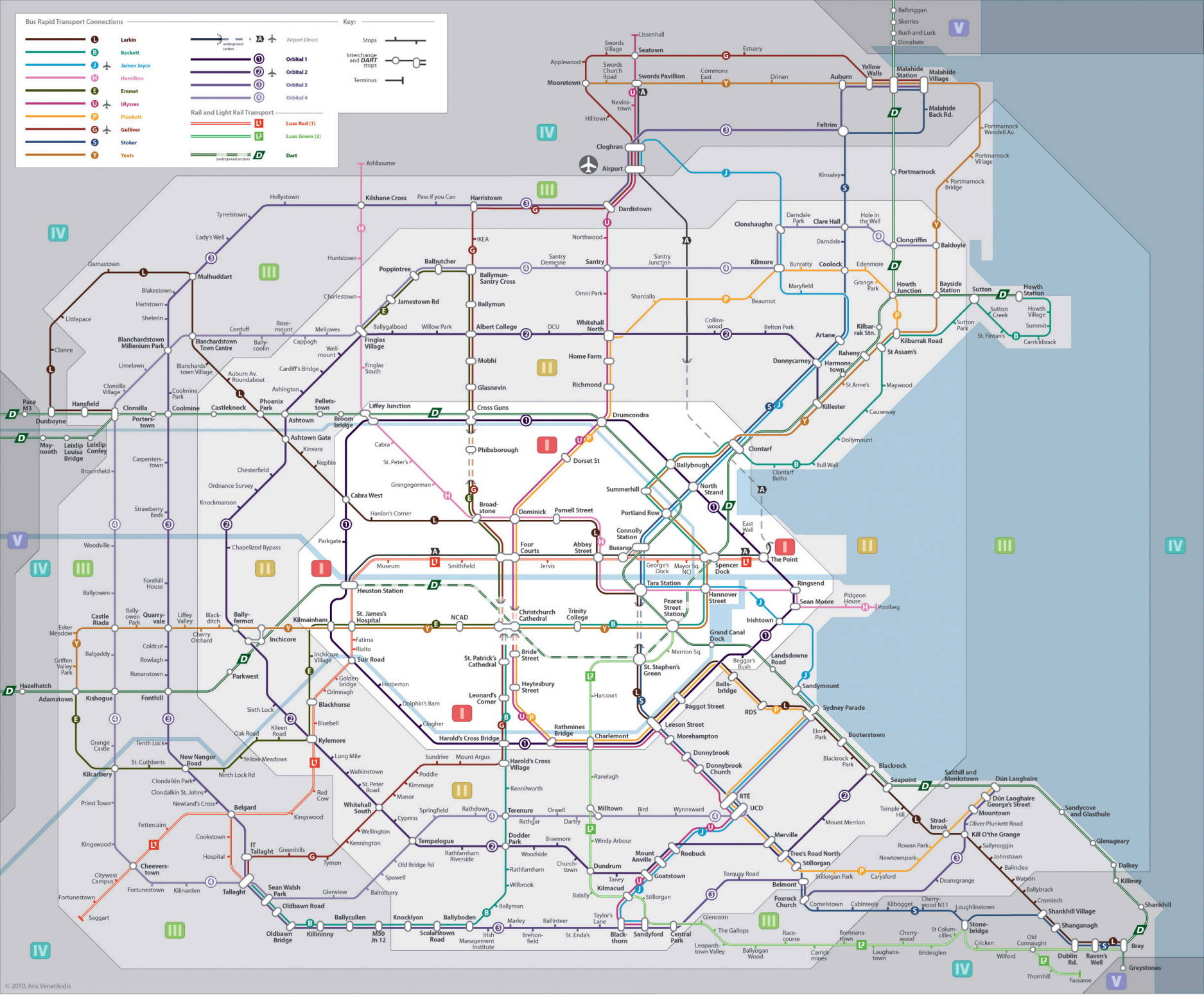
Provides local and national connections to Dublin Airport

Maximises exiting rail and port tunnel infrastructure

The airport and intercity line stops twice in the City Centre at Islandbridge and Liffey Junction. It includes interchanges with BRT, Luas, DART and train services at Donabate, Airport, Liffey Junction and Heuston/Islandbridge connecting the entire city and country.

An Taisce
The National Trust for Ireland

Balbriggan
Skerries
Rush and Lusk
Donabate
Rathbeale Rd.
Castlefarm
Castlegrange
Estuary
Swords North
Swords Central
Pinnockhill
Airside
Cloghran
Dublin Airport
Swords Road / Airport
Malahide
Portmarnock
Clongriffin
Belmayne
Newtown
Clare Hall
Coolock
Artane
Killester
Howth
Sutton
Bayside
Donaghmede
Kilbarrack
Raheny
Harmonstown
Killester
Clontarf Rd.
Spencer Dock
The Point
Castlewood
Huntstown Way
Blakestown
Blanchardstown Rd. South
Blanchardstown Town Centre
Snugborough Rd.
Mill Road
Millenium Park
Auburn Ave
Phoenix Park / Navan Road Parkway
Beechfield
Ongar
Allendale
Clonsilla
Navan North
Navan Central
Kilmessan
Dunshaughlin
Pace M3
Dunboyne
Hansfield
Porterstown
Clonsilla
Coolmine
Castleknock
Ashtown
Pelletstown
Broombridge
Liffey Junction
Silloge
Ballymun
Glasnevin
Collinstown
Turnapin
Santry North
Santry South
Collins Ave. / DCU
Griffith Ave.
Drumcondra Village
Cross Guns
Drumcondra
Clonliffe Rd.
Donnycarney
Griffith Ave.
Fairview Park
North Strand
Maynooth
Leixlip Confey
Leixlip Louisa Bridge
Ashtown Gate
Kinvara Ave
Nephin Rd.
Cabra
Phibsboro
Grangegorman
Broadstone
Dominick
Cabra Rd.
Mountjoy Sq.
Parnell
GPO / Marlboro / Abbey / O'Connell Br.
Prussia St.
Stoneybatter
Smithfield / Queen St.
Four Courts
Museum
Jervis
Connolly Station
Busaras
Portland Row
George's Dock
Tara St.
Mayor St.
Islandbridge
Park West
Fonthill
Kilshogue
Adamstown
Hazelhatch/Celbrige
Heuston
James's
Fatima
Rialto
Suir Road
Goldenbridge
Drimnagh
Blackhorse
Bluebell
Kylemore
Red Cow
Kingswood
Belgard
Fettercairn
Cheeverstown
Citywest Campus
Fortunestown
Saggart
Cookstown
Hospital
Tallaght
TBC
Liberties Quarter
Christchurch
Kevin St.
Clanbrasil St.
South Great Georges St.
Harold's Cross
Parkview
Mount Tallant
Terenure Road
Rathfarnham
Rathfarnham Castle/Woodview Cottages
Butterfield Ave. / Springfield Ave.
Trinity
Dawson
Pearse
Aungier St.
Stephens Green West
Harcourt
Ranelagh
Beechwood
Cowper
Milltown
Windy Arbour
Dundrum
Balally
Kilmacud
Stillorgan
Sandyford
Central Park
Glencairn
The Gallops
Leopardstown Valley
Ballyogan Woods
Carrickmines
Laughlanstown
Brides Glen
Leeson St. Lower
Earlsfort Terrace
Leeson St. Upper.
Appian Way
Morehampton Rd.
Donnybrook
Donnybrook Ch.
Nutley Lane
UCD
Stephen's Green East
Merrion Sq.
Grand Canal Dock
Landsdowne Rd.
Sandymount
Sydney Parade
Booterstown
Blackrock
Seapoint
Salthill / Monkstown
Dun Laoghaire
Sandycove / Glasthule
Glenageary
Dalkey
Killiney
Shankill
Bray
Greystones
Kilcoole
TBC
TBC


Bus Rapid Transport Connections
Larkin
Beckett
James Joyce
Hamilton
Emmet
Ulysses
Plunkett
Gulliver
Stoker
Yeats
Airport Direct
Orbital 1
Orbital 2
Orbital 3
Orbital 4
Rail and Light Rail Transport
Luas Red (1)
Luas Green (2)
Dart
Key:
Stops
Interchange and DART stops
Terminus
Balbriggan
Skerries
Rush and Lusk
Donabate
Lissenhall
Swords Village
Seatown
Estuary
Applewood
Swords Church Road
Swords Pavillion
Commons East
Drinan
Auburn
Yellow Walls
Malahide Station
Malahide Village
Malahide Back Rd.
Mooretown
Nevins-town
Hilltown
Feltrim
Portmarnock Wendell Av.
Portmarnock Village
Portmarnock Bridge
Cloghran
Airport
Kinsaley
Portmarnock
Ashbourne
Hollystown
Kilshane Cross
Pass if you Can
Harristown
Dardistown
Tyrrelstown
Lady's Well
IKEA
Northwood
Clonshaughn
Darndale Park
Clare Hall
Hole in the Wall
Clongriffin
Baldoyle
Damastown
Huntstown
Poppintree
Balbutcher
Ballymun-Santry Cross
Santry Demesne
Santry
Santry Junction
Kilmore
Darndale
Bunratty
Coolock
Edenmore
Howth Junction
Bayside Station
Howth Station
Sutton
Sutton Creek
Howth Village
Summit
Carrickbrack
Mulhuddart
Blakestown
Hartstown
Charlestown
Jamestown Rd
Ballymun
Omni Park
Shantalla
Maryfield
Grange Park
Littlepace
Shelerin
Corduff
Rose-mount
Mellowes
Ballygall-wood
Willow Park
Albert College
DCU
Whitehall North
Collins-wood
Belton Park
Artane
Kilbar-rak Stn.
Kilbarrak Road
St Fintan's
Sutton Park
Clonee
Blanchardstown Millenium Park
Blanchardstown Town Centre
Bally-coolin
Cappagh
Well-mount
Finglas Village
Finglas South
Beaumont
Howth Junction
Limelawn
Blanchards-town Village
Auburn Av. Roundabout
Cardiff's Bridge
Mobhi
Home Farm
Donnycarney
Harmons-town
Raheny
St Assam's
Clonsilla Village
Coolmine Park
Ashington
Glasnevin
Richmond
St Anne's
Maywood
Pace M3
Hansfield
Clonsilla
Coolmine
Castleknock
Phoenix Park
Pelletts-town
Liffey Junction
Cross Guns
Drumcondra
Killester
Causeway
Dunboyne
Porters-town
Ashtown
Broom-bridge
Ashtown Gate
Kinvara
Nephin
Cabra
Phibsborough
Dorset St
Clontarf
Dollymount
Maynooth
Leixlip Louisa Bridge
Leixlip Confey
Carpenters-town
Broomfield
Chesterfield
St. Peter's
Grangegorman
Ordnance Survey
Knockmaroon
Strawberry Beds
Cabra West
Broad-stone
Dominick
Parnell Street
Hanlon's Corner
Summerhill
North Strand
Ballybough
Clontarf Baths
Bull Wall
Portland Row
Woodville
Chapelizod Bypass
Parkgate
Four Courts
Abbey Street
Connolly Station
Busaras
East Wall
The Point
Museum
Smithfield
Jervis
George's Dock
Mayor Sq. NCI
Spencer Dock
Fonthill House
Heuston Station
Tara Station
Ringsend
Hannover Street
Pearse Street Station
Sean Moore
Pidgeon House
Poolbeg
Ballyowen
Castle Riada
Bally-owen Park
Quarry-vale
Liffey Valley
Black-ditch
Bally-fermot
Kilmainham
St. James's Hospital
NCAD
Christchurch Cathedral
Trinity College
Irishtown
Esker Meadow
Inchicore
Cherry Orchard
Fatima
Rialto
Suir Road
Grand Canal Dock
Merrion Sq.
Landsdowne Road
Balgaddy
Coldcut
Rowlagh
Griffen Valley Park
Ronanstown
Inchicore Village
St. Patrick's Cathedral
Bride Street
St. Stephen's Green
Beggar's Bush
Balls-bridge
Sandymount
Parkwest
Golden-bridge
Drimnagh
Herberton
Heytesbury Street
Harcourt
Hazelhatch
Adamstown
Kishogue
Fonthill
Blackhorse
Dolphin's Barn
Leonard's Corner
Baggot Street
RDS
Sydney Parade
Sixth Lock
Kileen Road
Bluebell
Clogher
Rathmines
Leeson Street
Oak Road
Harold's Cross Bridge
Charlemont
Morehampton
Booterstown
Grange Castle
Tenth Lock
Kylemore
Long Mile
Donnybrook
Elm Park
Blackrock Park
Blackrock
New Nangor Road
Yellow Meadows
Sundrive
Mount Argus
Harold's Cross Village
Donnybrook Church
Seapoint
Salthill and Monkstown
Dún Laoghaire
St. Cuthberts
Ninth Lock Rd
Kilcarbery
Clondalkin Park
Clondalkin St. Johns
Walkinstown
Poddle
Kimmage
Manor
Ranelagh
RTÉ
Dún Laoghaire George's Street
Mountown
Sandycove and Glasthule
Priest Town
Newland's Cross
Belgard
Red Cow
Kingswood
St. Peter Road
Whitehall South
Springfield
Rathdown
Terenure
Orwell
Rathgar
Dartry
Milltown
Bird
Wynnsward
UCD
Temple Hill
Mount Merrion
Strad-brook
Oliver Plunkett Road
Kill O'the Grange
Fettercairn
Cookstown
Wellington
Kennington
Tempelogue
Dodder Park
Braemore
Windy Arbour
Merville
Sallynoggin
Johnstown
Glenageary
Kingswood
Hospital
IT Tallaght
Greenhills
Tymon
Rathfarnham Riverside
Woodside
Roebuck
Rowan Park
Newtownpark
Balinclea
Dalkey
Cheevers-town
Old Bridge Rd
Rathfarnham
Church-town
Dundrum
Mount Anville
Tree's Road North
Stillorgan
Carysford
Killiney
Citywest Campus
Fortunestown
Kilnarden
Tallaght
Spawell
Wilbrook
Taney
Goatstown
Stillorgan Park
Deansgrange
Watson
Ballybrack
Saggart
Sean Walsh Park
Glenview
Balrothery
Ballyroan
Kilmacud
Balally
Torquay Road
Belmont
Foxrock Church
Cornelstown
Cabinteely
Kilbogget
Cherry-wood N11
Loughlinstown
Cromlech
Shankhill
Shankhill Village
Oldbawn Road
Ballycullen
Knocklyon
Ballyboden
Marley
Ballinteer
Taylor's Lane
Glencairn
Shanganagh
Oldbawn
Killininny
M50 Jn 12
Scholarstown Road
Irish Management Institute
Brehon-field
St. Enda's
Black-thorn
Sandyford
Central Park
The Gallops
Race-course
Brennans-town
Cherry-wood
St Colum-cilles
Stone-bridge
Old Connaught
Bray
Leopards-town Valley
Ballyogan Wood
Carrick-mines
Laughans-town
Bridesglen
Cricken
Willford
Dublin Rd.
Raven's Well
Greystones
Thornhill
Fassaroe
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