



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

Stakeholder Submission by DublinTown

Introduction

Dublin City Business Improvement District trading as DublinTown welcomes the opportunity to make this submission on the Public Consultation on the preparation of a new Transport Strategy for the Greater Dublin Area. DublinTown is the city's business improvement district and is a collective of 2,500 businesses based in the core city centre area. Collectively, these businesses employ almost 100,000 people and contribute €1bn in tax revenue each year.

DublinTown and its members are fully supportive of investment in a sustainable transport system for Dublin. Surveys of public opinion of Dublin city have revealed two predominant issues that detract from the city experience ; fears regarding the perceptions of public safety and issues of access to, and movement within the city. The city centre is not as accessible or as permeable as it should be and this is having a negative effect on businesses and consequently jobs and tax revenue. The continuous development and improvement of the transport system in Dublin is therefore in the interests of the city centre business community.

The Strategy is comprehensive, covering all the relevant transport modes as well as the environment for transport users, cyclists and pedestrians. There is much to be welcomed including:

- The need to integrate the planning of both residential and commercial zones in places where the need for long commutes is reduced and failing that where public transport options are most available.
- The better integration of transport options and the use of different public transport options in a complementary rather than competing fashion. This 'horses for courses' approach to transport planning is particularly welcome.
- The investment in infrastructure such as DART Underground and Metro North which are essential and long overdue.

In this submission, DublinTown highlights a number of priority issues for the business community including timeframe for delivery of the Strategy; integration of planning and transport needs; integration of service and user costs; economic environment and funding; enhancing the pedestrian experience; improving various modes of transport; use of technology; safety and enforcement.

Transport in Dublin City Centre

Currently, Dublin lags significantly behind competitor cities in terms of transport infrastructure and services. We believe that investment will determine Dublin's performance as a city in which to live, visit and do

business. The Global Financial Centres Index ranked Dublin 70th place out of a total of 83 as a financial centre, well below the 10th position it enjoyed five years ago. The European Green City Index measures and rates the environmental performance of 30 leading European cities. While Dublin performs well in indicators such as air quality and water, it is only ranked 21st overall and it is ranked last in a list of 30 European cities in terms of transport (see figure 1 below). An EU study on sustainable urban mobility highlights that Ireland and the Dublin Region in particular perform poorly in terms of urban displacement and sprawl.¹

After years of underinvestment in our transport infrastructure, the gap is increasing between us and our competitors. Our future success is dependent on improving our competitive position as quickly as possible. This is important for DublinTown members in the retail and hospitality sector and for attracting inward investment. Increasingly, major corporations are influenced by the quality of life that a city can offer their employees when choosing to invest. Quality residential options with access to the workplace and connectivity with leisure pursuits feature strongly in this quality of life assessment.

The Strategy outlines the population, employment growth and retail growth in the Greater Dublin Area, driving the need for new transport infrastructure. The population of the Greater Dublin Area grew by 19% in the ten year period between 1996 and 2006 and 8.3% between 2006 and 2011. Employment grew by 40% between 1996 and 2006. Both population and employment are expected to grow by 39% in the period from 2006 to 2030. It is estimated that the number of journeys that will be made by people within the GDA each weekday in 2030 will be in excess of 6 million. It is unlikely that there will be any growth in the current 10,000 car parking spaces in the city centre so additional commuters will mainly have to be accommodated on public transport and other sustainable modes of transport. It is evident that the current transport infrastructure would be unable to support this growth in population without appropriate investment. As noted in the Strategy, congestion will become a serious issue and congestion delays and the associated journey time unreliability will impose direct costs on businesses and the local economy, as well as social costs. While the growth projections give an impression of excessive urbanisation or development, the reality is actually counter-intuitive. Dublin is under-urbanized as a population centre, and there is significant capacity for commercial and population growth.

Strong environmental and social arguments can be made in favour of using sustainable transport to meet the needs of this growing population. It has to be recognised that we have probably passed peak oil production and there are real environmental concerns with the use of fracking etc. Not only has the EU guided us to use alternatives to fossil fuels but it is likely that as this century progresses that there will simply not be enough oil to meet the needs of the modern world. This will lead to an escalation in costs. People will wish to transfer to sustainable options and we will need the infrastructure in place to meet that demand.

Our greatest concern with the Strategy is the time scale for delivery. While we accept that the report will be broken into six year segments with targets in each of those six year segments, we believe that a timescale of almost 20 years is simply too long. It is imperative that mechanisms are found to accelerate the pace of investment in our transport infrastructure. Failure to do so will lead to tax revenues forgone and a further drop in our competitiveness. We need to start to think of infrastructural development as a long-term investment rather than focusing solely on the current cost to the exchequer. Investment in quality transport infrastructure such as the Luas will result in a real increase in network capacity and in increased revenue and a growth in competitiveness. As demonstrated by the Luas, a public transport system that is required can pay for itself. Sacrifices made by the public and the business community during the construction phase are worthwhile unlike short-term solutions which give rise to significant disruption for very little return. Also the policy options presented in the Draft Strategy are evaluated in Chapter 12 on a 3 hour peak time analysis. By 2030 Dublin will be a 24-hour poly-centric city. We would suggest that a more expansive view of a network system is

¹ Booz & Co. Study on the financing needs in the area of Sustainable Urban Mobility, Prepared for Directorate General for Mobility and Transport, March 2012

warranted. We believe that the aim should be to have the majority of the proposed infrastructure in place by 2025 to ensure that Dublin continues to compete as an international city. We need a more defined plan with an exact condensed timetable for delivery.

Figure 1:

Overall		Transport			
City	Score	City	Score		
1	Copenhagen	87,31	1	Stockholm	8,81
2	Stockholm	86,65	2	Amsterdam	8,44
3	Oslo	83,98	3	Copenhagen	8,29
4	Vienna	83,34	4	Vienna	8,00
5	Amsterdam	83,03	5	Oslo	7,92
6	Zurich	82,31	6	Zurich	7,83
7	Helsinki	79,29	7	Brussels	7,49
8	Berlin	79,01	8	Bratislava	7,16
9	Brussels	78,01	9	Helsinki	7,08
10	Paris	73,21	-10	Budapest	6,64
11	London	71,56	-10	Tallinn	6,64
12	Madrid	67,08	12	Berlin	6,60
13	Vilnius	62,77	13	Ljubljana	6,17
14	Rome	62,58	14	Riga	6,16
15	Riga	59,57	15	Madrid	6,01
16	Warsaw	59,04	16	London	5,55
17	Budapest	57,55	17	Athens	5,48
18	Lisbon	57,25	18	Rome	5,31
19	Ljubljana	56,39	-19	Kiev	5,29
20	Bratislava	56,09	-19	Paris	5,29
21	Dublin	53,98	-19	Vilnius	5,29
22	Athens	53,09	-19	Zagreb	5,29
23	Tallinn	52,98	23	Istanbul	5,12
24	Prague	49,78	24	Warsaw	5,11
25	Istanbul	45,20	25	Lisbon	4,73
26	Zagreb	42,36	26	Prague	4,71
27	Belgrade	40,03	27	Sofia	4,62
28	Bucharest	39,14	28	Bucharest	4,55
29	Sofia	36,85	29	Belgrade	3,98
30	Kiev	32,33	30	Dublin	2,88

Integration of planning and transport needs

One very welcome inclusion in the Strategy is the emphasis on integrating transport into the heart of the planning system. The Strategy identifies the impact that poor planning has had on the city’s development. Poorly planned estates in outlying areas have given rise to an excess reliance on unsustainable car transport. These estates often have poor transport links and little in the way of schools, medical and shopping facilities. Integrating land use and transport to provide viable catchments will sustain public transport and reduce reliance on the private car. Planned strategic development should not be hindered by narrow parochial interests.

DublinTown welcomes the proposals for the integration of both residential and commercial planning with adequate transport provision. However, it is a matter of concern that the rapid rise in city centre house prices and the inadequate supply to meet rising demand are again forcing young couples further out of the city where

transport options are less accessible and efficient. There must be an immediate alignment of residential planning which prioritises higher density accommodation closer to the city core which will allow for increased, walking, cycling and concentrations of public transport options. There are designs that we can borrow from other European countries which allow for better incorporation of family needs within higher density accommodation. If we continue to fail to address these basic needs, our attempts to address the city's transport needs will be severely undermined.

A significant concern regarding the Transport Strategy, as well as the recent Swiftway (BRT) and Dublin North City studies is a presumption that the impact on land use patterns and development will be neutral irrespective of the transport option adopted. In other words, there is no stress-testing of a no-Metro/no-Dart underground scenario. We suggest that the impact would certainly not be neutral. Rather that the environmental impact in planning and land use terms would be negative and significant for the region, as it would encourage the perpetuation of (restricted) sprawl growth trends.

The Draft Strategy lists a number of regional and national strategies, but doesn't analyse whether the policies have been successful or discuss the impact they have had relative to transport.

Similarly, as delivery deadlines are extended the impact on land use is not neutral, but negative, as the non-delivery of high capacity, high-quality transport services encourages the very same unsustainable land use trends the strategy sets out to counteract. This is a very important issue for the Strategic Environmental Assessment to address.

Integration of services & user costs

In order to make public transport more appealing, we must ensure that the transport system is affordable, accessible and easy to use. We need to consider how to promote integrated ticketing and fares, greater interchangeability between modes and reduction in the total cost of a journey. The availability of the Leap Card is a significant new asset which is not being used to its full capacity. The new fare structure for teens and children, the Leap90 Discount and the DART Short Hop Zone fare all encourage greater use of public transport. We believe that the introduction of a more modest city centre fare similar to the one which exists on Dublin Bus could also be very beneficial. Any disputes between providers as to the division of income must be within the capacity of the NTA to resolve. Once Luas Cross City is launched, it will become much easier to travel within the city centre, particularly from the North to South and vice versa. It will be possible to go from Harcourt Street to the IFSC or Smithfield with one change and the new proposed cultural district on Parnell Square will be accessible from various parts of the city. It is important that this move towards greater interchangeability and integrated ticketing is not accompanied by any increase in cost. There are already concerns amongst businesses at the significant increase in the cost of public transport which is running well ahead of inflation. The development of integrated, low cost travel options will also result in fewer cars in the core city centre which will help ease congestion.

In terms of road use costs, there is considerable concern amongst city centre business that a congestion charge will be introduced. It is felt that this will simply serve to increase the relative cost of coming into the city and boost the attractiveness of the out of town shopping centres. Research conducted by Millward Browne on behalf of Dublin Town revealed 76% of shoppers travel by car to Dundrum Town Centre while 43% of people shopping in the M50 shopping centres do so because they find those centres more convenient for car use. While 27% do so because they feel that the shopping centres are safer than the city centre. Without an appropriate balance, road use decisions may not take cars off the road but merely change the direction in which they are driven. If a congestion charge is introduced to the city, it must be matched by a levy on parking

spaces in out of town shopping centres to balance the costs. Similarly, tolls on the M50 and approach roads would have to be considered. A benefit in kind tax on car parking spaces at the place of work both in the city and the hinterland would be considerably fairer than a congestion charge on shoppers. It should be noted that the car is used for particular high value shopping trips, transporting awkward/large purchases and when the family group is large and purchasing multiple products around important seasonal periods. The transport strategy plans to discourage car use into the City have the potential to drive this critical business out of town.

What is required is a balanced approach to transportation where cars are respected as an important part of the transport mix alongside public transport and bicycles as this will help sustain the commercial heart of the City and save jobs. Such a balanced strategy is required that recognises the importance of each method of transportation to the commercial viability of Dublin city centre. There is a tendency to disregard the car borne shopper in these discussions. It must be remembered that there are varying typologies of shopping expedition. The same customer will use the car for certain shopping missions whilst using public transport for others. If the car borne customer is completely disenfranchised from the city, the viability of city centre shopping will be significantly compromised with consequent effects on the entire economy of the Central Business District.

Economic Environment & Funding

The Strategy states that funding availability for investment in public transport infrastructure will be limited in the initial period of the plan due to the unprecedented economic circumstances prevailing in Ireland at the time of adoption of the Strategy. DublinTown contends that the economic environment in Ireland has improved significantly since the Strategy was first written and published in April 2012. Bond yields have fallen considerably, making borrowing for capital purposes considerably more attractive and we have seen significant economic growth rates with increases in tax revenues. During the Celtic Tiger, billions of euro were squandered on unnecessary spending leaving required projects like Metro North and DART Underground as plans rather than reality. In order to develop a city that meets the expectations of its citizens and attracts inward investment, the capital infrastructure required to create an integrated transport system must be prioritised. Investment in necessary transport infrastructure will provide a return in terms of sustained economic growth and employment growth. In our recent submission on the Fingal/North Dublin Transport Study, we identified DART Underground as an essential platform from which other elements of the integrated transport system can be added. Without it, it will prove immensely difficult to have a transport system that works effectively. We also identified Metro North as an essential piece of infrastructure which will provide the fastest journey times and cater for the largest catchment area. It integrates well with other transport modes and has already gone through the planning and statutory approvals process, thereby significantly reducing lead times when compared to all other transport alternatives.

Other funding models should also be considered for investment in public transport infrastructure. Speaking about the Crossrail initiative, it was noted that while it cost £15bn to complete, the commercial value was £12bn. The view is that the public sector should fund the gap while a PPP partner should fund the commercial value. We believe that a similar approach should be taken to the development of key infrastructure such as DART Underground and Metro North. It is worth noting that conditions which are good for commuters and Government objectives such as Greenhouse gas emissions etc. may reduce the commercial value of the projects with consequent reductions in their PPP values.

Improvement in rail services

The NTA's recent Dublin City Centre's Shoppers Survey revealed that only 3% of shoppers use the train for getting to and from the city centre in comparison with 16% travelling by Luas. There is a clear opportunity here

for increasing the numbers using the train to come into the city for shopping and recreation. To achieve this we need to increase the frequency of trains and create a more legible timetable structure. This will require significant investment in DART underground and signalling at Connolly which is long overdue. This will free up capacity on both the DART and the Maynooth line which should be upgraded to a fully integrated DART service. A difficulty faced by the DART is the need to share the line with the Belfast train as well as some freight services. In order to overcome this problem, the northern line will have to be upgraded to four tracks to allow the DART to run simultaneously with the Belfast train. We would support the concept of a link from Clongriffin to the airport. This would open up an excellent connection for north Dublin, Louth and Northern Ireland to the airport. Maximising the potential of this investment would lend weight to the argument that the northern line be upgraded to a four-track solution. We would also be in favour of a rail line from Navan through Dunboyne and linking via the Maynooth line to the city. Navan has a growing population and a rail link with Dublin city would undoubtedly encourage residents to shop and socialise in the city. It is also worth noting that Maynooth University has recently announced a €153m investment to develop academic, research and residence facilities to facilitate the growth from its current 10,500 students to 13,000 students by 2020. The business case for such a line needs to be given serious consideration.

We also see great potential for improving the customer experience at DART stations. Shoppers are currently guided away from Talbot/Henry Street and towards the Luas Service at Connolly Station. The only exit towards Talbot Street is a very steep stairway with inadequate signage. A more obvious and attractive exit would help to guide shoppers in the direction of Talbot Street. Additional space could be created at DART stations by taking out many of the outdated station houses and establishing self-service platforms similar to the Luas. With any increase in DART provision, the issue of level crossings will need to be addressed. These are an anachronism in a modern city.

Bus services

The positive trend in Dublin Bus passengers is a reflection on the ever improving service offered to the people of Dublin and our visitors. Real time information is a significant addition and is testimony to the improvements that technology can offer the travelling public. The NTA's recent survey revealed that the bus is the most frequently used mode of transport at 41%. Furthermore, one in two respondents had used the bus in the past 4 weeks for other visits to the city centre, which is twice the next most frequented transport mode (car at 19%). As noted previously, we would see scope for more strategic orbital routes connecting facilities such as hospitals to residential areas and also serving as a connector between various transport modes. It is our view that the BRT proposal from Swords to the city would not be a long-term solution to the growing demand for public transport. Due to the lack of road space in the city centre, we would favour additional rail options that do not require re-allocation of what is a rare resource. However, we do see significant scope for the use of BRT in other contexts. For example, there is considerable scope for using BRT on orbital routes e.g. Tallaght through Rathfarnham, Dundrum, UCD, Elm Park and connecting with DART. Similarly, a BRT would appear to be a potential gain for the Lucan connection to Heuston Station and the Metro West route which will also provide significant connectivity with important infrastructure to the West of the city. This route could go onto Swords and meet with the DART at Malahide. There is also a strong case to be made for the use of BRT to connect from Brides Glen to Bray. This would link the Luas Green line with the southern DART line connecting people from Bray and the DART line directly to the employment hubs of Cherrywood and Sandymount. This would offer a more integrated service for residents in these areas.

Although we are not in favour of the BRT concept on the Swords route we would like to see greater use of on street ticketing and better quality bus stops on upgraded QBC's. The creation of elongated bus stops would facilitate the consolidation of bus stops in the city where a number of buses could stop simultaneously. We would also like to see additional routes use the Network Direct concept. This would result in less lay over periods in the city centre and would help breathe new life into streets like Talbot Street and Marlborough

Street. As highlighted in the Strategy, there is a need to address additional bus lay-over spaces and coach parking. It is our view that passenger coaches should move out of the core city centre to park after passengers have disembarked.

Enhancing the pedestrian environment

There is significant scope for redesigning pedestrian ways in the city to make them more attractive to pedestrians, particularly on the north side of the city. Aside from Grafton Street, the Henry and Mary Street area has the strongest footfall in the city centre. Henry and Mary Street benefit greatly from uniform, high quality granite paving and from the pedestrian-only access to the street from 11am each day. Once one reaches the junction of Mary Street and Jervis Street there is a notable change in the pedestrian environment. The quality granite paving ends and there is a pedestrian crossing with pedestrian lights on Jervis Street. The change in paving, the built environment and the traffic arrangement in this area create a boundary for the pedestrian. We have proposed changes to the paving and traffic flow in the area (see Figure 2 & Figure 3 below) which we believe would improve pedestrian flow through the area and improve the pedestrian environment.

Figure 2:

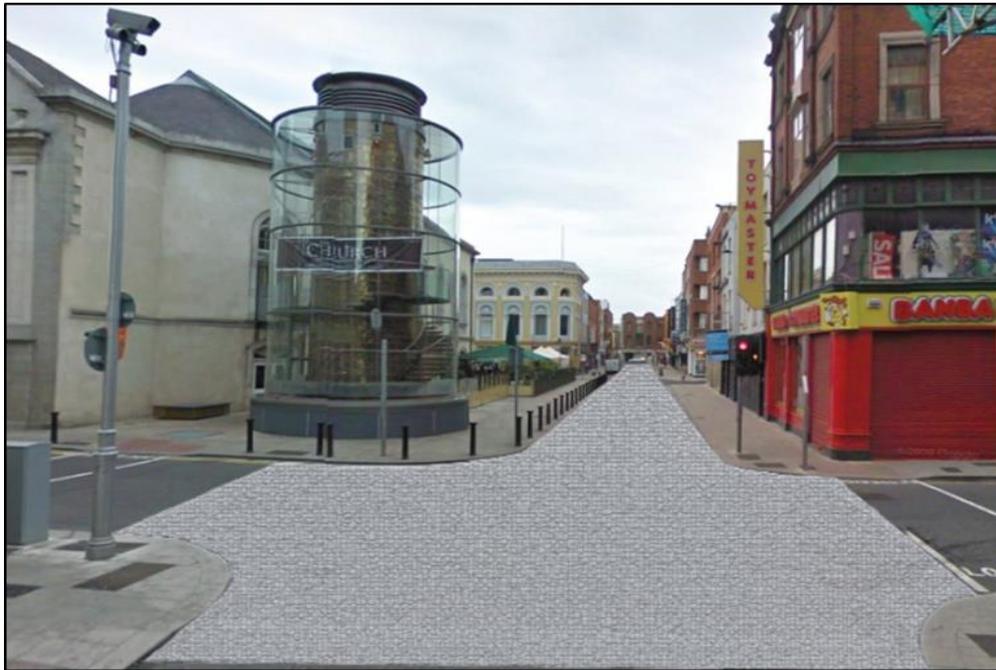


Figure 3:



We would also propose an upgrade of Liffey Street Upper and Lower, Moore Street and Parnell Street. There is a need for additional lighting and the addition of basic amenities such as seating and public toilets. The provision of safe, clean, public toilets would be of considerable benefit to families with young children. Our view is that concerns over potential misuse of such facilities should not take precedence over the necessity of providing adequate amenities for pedestrians in the city.

Some spaces within the city could benefit from further pedestrianisation however there is also some need for vehicle access for car parks and hotels. One such location is Wicklow/Exchequer Street. In this instance it may be worth having a dual use space where only cars going to the car park or hotel will have access on a one way system. The street could look like a pedestrian street but with a central median separately coloured to signify that cars may travel down it from time to time. This would allow for extension of the footpath and the creation of additional walking space on the street. DublinTown welcomes as much pedestrianisation of the retail core as possible to create a safe and relaxing environment within the city centre. As a general rule we welcome the widening of footpaths and the taking out of on-street parking to achieve this. When combined with outdoor seating and more on-street animation, we can create a far more welcoming environment. These proposals may cause some concerns so it may be preferable to trial such ideas for a period of time to assess the impacts. If the impact is positive, longer term plans can be implemented. In the longer term, greater priority should be given to park and ride and larger car parks on the periphery of the commercial/retail district beside Luas and bus routes into the city centre.

There is potential for the development of walking apps to guide people through the city with greater ease. The concept of a car parking app is also discussed later in this submission. As outlined in the Strategy, clutter such as redundant signs and poles should be removed, and other street furniture rationalised where possible. The development of a walking app and interactive information points could assist in de-cluttering the city.

Cycle corridors

Over the past few years, there has been a huge growth in the number of cyclists both nationally and globally and this is set to continue. Research has shown that there was a 52% increase in the number of people cycling into the city between 2010 and 2013, albeit from a low base. This increase in cycle traffic will give rise to additional requirements in respect of cyclist’s safety. The Strategy correctly identifies the need for additional segregated cycle ways. Our view is that the Liffey Corridor should be achieved through an extension of the

board walk to create the additional space required to accommodate this cycle way. We also believe a significant amount of safe cycle parking must be provided. As space is at a premium in the city, imaginative solutions will have to be found to solve this issue. The chaining of bicycles to lamp posts and other street furniture is simply not an option and if left unchecked, will undermine the desirability of the city for other parties and impede pedestrian movement. We welcome the provision of bicycle carriage facilities on Irish Rail services and the carriage of folded bicycles on the Luas. Luas Cycle + Ride facilities encourage the integrated use of bicycles and trams in Dublin and we would be in favour of the expansion of this scheme at other stations and stops.

Unsafe cycling practices are commonplace in the city such as cycling on pedestrianised streets, excessive speeds in pedestrianized spaces, illegal and dangerous parking, breaking traffic lights, cycling the wrong way down one way streets, etc. Given the anticipated increase in cyclists in the city, the enforcement of regulations for cyclists is essential. A registration system for cyclists may be required and on the spot fines should be introduced for breaches of regulations. Failure to regulate cycling could lead to criticism of cycling in general and ultimately limit the potential number of cyclists in the city.

The NTA Strategy should highlight that “soft” transport measures can be delivered independently of bus or rail investment. There is some concern that while the strategy contains excellent objectives and policies for public realm, the quality agenda is not being delivered on the ground.

Taxis

While we recognise that taxis provide necessary transport for those without access to a car or a scheduled public transport service, we believe that there are too many taxis operating in Dublin. We would advocate for the reintroduction of regulation of the taxi industry and the enforcement of standards with a points system. Non-compliance should lead to fines or the loss of a license where required. There is also scope for greater taxi marshalling with smaller taxi ranks. The current use of Foster Place as a spill over taxi rank is an under-utilisation of the space which could be opened up for the use of cafés and restaurants.

Use of Technology

Over 70% of the Irish adult population have a smart phone and there is increasing use of apps amongst the general population. This trend presents a significant opportunity to promote better transport options through apps. This has already commenced with the NTA’s own Journey Planner. We believe that there is further scope for the development of an app to guide people through the city to Dublin’s car parks. Similar to a sat nav, the app would guide the user to their car park of choice. It can be confusing to navigate the city and this app would guide people more safely through the city centre. The app would also be able to advise the user of the number of vacant spaces available in the car parks so people can assess their destination as they leave their homes.

The cost of this technology is relatively cheap, particularly if there is cost sharing between interested parties. A recent NTA shopping survey shows that 19% of people use their cars to go shopping and that on average they will spend €117 on each shopping trip. The car borne shopper is still an essential component of the retail mix and cannot be forgone in balancing the city’s retail books.

The introduction of free Wi-Fi on Dublin Bus over two years ago has been very popular. It is our view that Wi-Fi should be rolled out on Luas and DART services to ensure uniformity of service from public service providers. Combining free Wi-Fi with an active social media presence can assist in attracting new customers.

Delivery Service

We would like to explore the possibility of working with the NTA to develop a delivery service outside the city. This model would draw heavily on our experience of providing a ‘Shop and Drop’ service in the city during the

Christmas period. This service would offer customers the option of having their goods delivered home or to their place of work. It would be particularly helpful for customers who are walking, cycling or taking public transport. The scheme could be paid for by retailers and customers, perhaps via their leap card.

Safety concerns

As mentioned previously, surveys of public opinion of Dublin City revealed fears regarding perceptions of public safety. The Strategy identifies the importance of improving safety, and perceptions of safety, for those who walk and cycle. People are encouraged by the provision of attractive walking and cycling networks and areas become safer for everyone. Concerns have been raised about perceptions of safety on public transport in the Greater Dublin Area. The safety issues arising on public transport merely mirror the concerns that pertain throughout the rest of society. Research conducted by Millward Browne on behalf of Dublin Town revealed 27% of people shopping in the M50 shopping centres do so because they feel that the shopping centres are safer than the city centre.

In order to develop the customer base for both retailers and the hospitality industries we need to consider how our public transport infrastructure can be made safer for our local population. We welcome the provision of security personnel on the Luas and we believe consideration should be given to the introduction of transport police, as in other European countries. The police could perhaps be paid for through budget allocations amongst transport providers or from existing security budgets. We strongly believe that the potential for transport police to board a Luas, bus or DART would give significant comfort to the general population.

Enforcement

Appropriate enforcement of traffic regulations is necessary to provide a welcoming city centre environment. We would be in favour of the authorisation of civil authorities to deal with issues such as illegal parking, taxi over ranking, driving and cycling on pedestrian streets and non-compliance with deliveries in pedestrian streets etc. Also greater regulation of utility companies that do not comply with the terms of their T2 licenses is required. We are strongly in favour of extending the night-time derogation for the collection of household and commercial waste. Twice-nightly collections would ensure a more attractive environment for day-time and night-time businesses.

Conclusion

In this submission, various priority issues for Dublin's business community have been outlined. DublinTown welcomes the Strategy and its vision for a competitive, sustainable city-region with a good quality of life for all. Currently Dublin is lagging behind our competitors in terms of transport infrastructure and our future success is dependent on improving our competitive position as quickly as possible. We are concerned about the time scale for delivery of the Strategy and we would welcome a more defined plan with an exact condensed timetable for delivery. A successful transport system requires a long-term view and the effective integration of planning and transport needs. We need to start to think of infrastructural development as a long-term investment which will be in place for future generations.

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